

Tuesday, 7 November 2023

1
2 (10.00 am)
3 **MR BEER:** Good morning, sir, can you see and hear
4 me?
5 **SIR WYN WILLIAMS:** Yes, I can, Mr Beer.
6 I understand that there's been a flurry of
7 correspondence from those acting for the Post
8 Office in relation to documentation but that
9 doesn't necessarily affect the questions you
10 wish to put to Ms Cottam; is that correct,
11 Mr Beer?
12 **MR BEER:** Sir, that's right. We've been told by the
13 Post Office's representatives that the recent
14 discoveries that they have made do not reveal
15 documents that concern Mrs Elaine Cottam and so,
16 although we plan to discuss the recent
17 revelations today, we would propose that we hear
18 from Mrs Cottam first and then deal with the
19 disclosure issues.
20 **SIR WYN WILLIAMS:** Yes, that sounds fine to me. So
21 unless someone in the room is trying to attract
22 my attention to say something different, that's
23 what we'll do, Mr Beer.
24 **MR BEER:** Thank you, nobody is saying otherwise.
25 **SIR WYN WILLIAMS:** Fine. Thank you.

1

1 witness statement to be displayed -- the URN is
2 WITN09530100.
3 Mrs Cottam, you were asked by the Inquiry on
4 12 July 2023 to provide a witness statement and
5 accompanying that request was a large volume of
6 documents that were relevant to the questions
7 that we were asking of you, which documents
8 dated from your time in the Post Office, and
9 you've provided us, we've just established, with
10 a witness statement that's two and a half pages
11 long, which contains next to no information. Is
12 there a reason for that?
13 **A.** I don't know what sort of information you wanted
14 me to put in it.
15 **Q.** Well, by way of example, the first question we
16 asked you was to set out your professional
17 background. You've not answered that at all.
18 Is there a reason for that?
19 **A.** No, no, it's just a misunderstanding. I can
20 give you that now.
21 **Q.** I'm asking you why you didn't include it in your
22 witness statement when we were asking you to.
23 **A.** I don't know. I can't remember being asked to
24 do it because I would have done it because
25 I have it here.

3

1 **MR BEER:** May Mrs Cottam swear or affirm, please.
2 **SIR WYN WILLIAMS:** Yes.
3 **ELAINE MARY COTTAM (affirmed)**
4 **Questioned by MR BEER**
5 **MR BEER:** Thank you very much, Mrs Cottam, can you
6 see and hear me?
7 **A.** Yes, I can.
8 **Q.** Thank you very much, my name is Jason Beer and
9 I ask questions on behalf of the Inquiry. Can
10 you please give us your full name?
11 **A.** My name is Elaine Mary Cottam.
12 **Q.** Thank you very much for attending remotely to
13 give evidence to the Inquiry, we're very
14 grateful. You should have in front of you
15 a hard copy of your witness statement which --
16 **A.** I have.
17 **Q.** -- is two and a half pages in length and dated
18 31 July 2023; is that right?
19 **A.** It is.
20 **Q.** On the third page of it, is that your signature?
21 **A.** It is.
22 **Q.** Are the contents of the witness statement true
23 to the best of your knowledge and belief?
24 **A.** They are.
25 **Q.** For the transcript -- there's no need for the

2

1 **Q.** The request of 12 July says, "Please set out
2 your professional background", and you haven't:
3 why not?
4 **A.** It's just a misunderstanding, I didn't know
5 I had to do it because -- I actually have it
6 here.
7 **Q.** What are you saying you "have it here"?
8 **A.** Well, I have it written down.
9 **Q.** Your professional background?
10 **A.** Yeah, within the Post Office, yes.
11 **Q.** So what was the nature of the misunderstanding?
12 You receive a letter which says "Please" --
13 **A.** Which letter was it? Because I have my letters
14 here.
15 **Q.** 12 July 2023 and it says, "Please set out your
16 professional background". What was the nature
17 of the misunderstanding, between whom?
18 **A.** Just between myself and what I was asked for.
19 What date was the letter?
20 **Q.** What didn't you understand when --
21 **A.** Well, if you can let me find the letter. What
22 was the date of the letter, please?
23 **Q.** 12 July 2023.
24 **A.** 12 July 2023. August ... well, I've got
25 everything in my file in order and I don't have

4

1 it. The first letter I've got is just about
 2 this bundle. I'm sorry, there was no intention
 3 to mislead but I haven't got it. I'll just have
 4 a look in the -- I've got three different files
 5 here, the one from Ashfords --
 6 **Q.** They're your solicitors.
 7 **A.** Oh, right, so you won't need that one. The
 8 other one is the same. That's just the same as
 9 this huge thing I've got here.
 10 **Q.** Okay, don't trouble yourself with the bundles.
 11 I'm telling you, you were sent a letter on
 12 12 July 2023, which led to this witness
 13 statement being created. The first question
 14 said, "Please set out a summary of your
 15 professional background". You appear to have
 16 ignored that: why?
 17 **A.** I've got -- well, I've just put I was employed
 18 as a Retail Line Manager, Post Office Counters.
 19 I don't remember the date I took up this post or
 20 the date I left. I put that I was responsible
 21 for 27 post offices, I have that here.
 22 **Q.** Is that a full and complete statement of your
 23 professional background?
 24 **A.** With the Post Office, yes.
 25 **Q.** Does it say when you joined the Post Office?

5

1 **A.** 1979, as a postal officer.
 2 **Q.** Which branch?
 3 **A.** Cleveleys branch but it was a directly
 4 controlled branch then. It wasn't a modified
 5 Post Office, as it is now.
 6 **Q.** What's the significance of that?
 7 **A.** I was directly employed by the Post Office, not
 8 like with the modified office, as
 9 a subpostmaster.
 10 **Q.** How long did you work at Cleveleys?
 11 **A.** I worked there until 1981, when I transferred to
 12 Blackpool branch office as an Assistant Manager.
 13 **Q.** What did you do in Blackpool branch office?
 14 **A.** Well, I managed the staff that were there. It
 15 was basically the counter duties, making sure
 16 everybody was there on time. Just general
 17 day-to-day working of the office to make sure
 18 there was enough cash for everybody, to make
 19 sure that everybody was balancing correctly, to
 20 make sure the counters were tidy, clean.
 21 I was the assistant manager, so the manager
 22 would have done a lot of the direct transferring
 23 of cash to them in the morning. I would have
 24 done a lot of checking their balance sheets.
 25 Certainly with pension dockets that were then,

7

1 **A.** No.
 2 **Q.** Does it say when you left the Post Office?
 3 **A.** This is --
 4 **Q.** Hold on, hold on.
 5 **A.** Sorry.
 6 **Q.** It doesn't say when you joined the Post Office.
 7 It doesn't say when you left the Post Office.
 8 Why not?
 9 **A.** No. Because I didn't know that that was asked
 10 for. I've got that information here and I would
 11 have included it if I'd have known that's what
 12 it was. I thought we were talking just about
 13 the Retail Line Manager's job that I did.
 14 I didn't know it was from when I first joined
 15 the Post Office.
 16 **Q.** So when you received --
 17 **A.** It --
 18 **Q.** When you received a question that said, "Please
 19 set out your professional background", you
 20 understood that only to relate to your job as
 21 a Retail Line Manager?
 22 **A.** Yes, yes, I did. I've written the rest of it
 23 down because I thought I'd be asked about it
 24 today, how I got to be this.
 25 **Q.** Okay, when did you join the Post Office?

6

1 I would sometimes -- I'd list all those for them
 2 to help them, just generally managing the
 3 day-to-day running of it.
 4 **Q.** When did you leave the Blackpool office?
 5 **A.** I transferred to Poulton-le-Fylde as a manager
 6 in 1981.
 7 **Q.** How long did you stay there?
 8 **A.** I'm not sure when I left there. I went to South
 9 Shore as a manager. But I'm -- I really can't
 10 remember the dates after that. I wasn't --
 11 I was the manager at Poulton, then I went to
 12 another branch office but I really don't know
 13 when the dates were.
 14 **Q.** What was your next job after that?
 15 **A.** After Poulton, I went to South Shore, which is
 16 a bigger branch, and then from South Shore,
 17 I moved to Preston as the Assistant Manager
 18 because that was a much bigger office.
 19 **Q.** Then after Preston?
 20 **A.** After Preston I joined the Retail Line as
 21 a Retail Network Manager.
 22 **Q.** When did you become a Retail Line Manager?
 23 **A.** Not sure. I don't know the date.
 24 **Q.** Can you remember the decade?
 25 **A.** Well, if that was ... I think it was the '90s.

8

1 Let me think. Yeah, it would have been late
 2 '90s.
 3 **Q.** Late '90s and how long were you --
 4 **A.** Yeah --
 5 **Q.** How long were you a Retail Line Manager for?
 6 **A.** From I think it was 1979 until I retired when
 7 I was -- was I 40 or 50? I was 50, I think --
 8 **Q.** What's the date of your retirement?
 9 **A.** I don't know. Can't remember.
 10 **Q.** What was your job as a Retail Line Manager?
 11 What did it involve?
 12 **A.** It involved overseeing the running of 27 post
 13 offices. Originally it was 27 and then they did
 14 some sort of shuffling about, where they took
 15 the smaller one -- the smaller offices off, and
 16 I ended up with about 12, I think, of the larger
 17 offices.
 18 **Q.** What does "overseeing" mean?
 19 **A.** Well, not managing, because they all had their
 20 own -- there were subpostmasters, so they ran
 21 their own office, but overseeing that everything
 22 was being done correctly, making sure they were
 23 adhering to all the standards that were laid
 24 down in the contracts, helping them if they'd
 25 got any trouble with anything. If they were

9

1 **A.** Yes.
 2 **Q.** If we scroll down to paragraphs 1 and 2.,
 3 there's an introduction there where you say
 4 then, that's October 2003 --
 5 **A.** Yeah.
 6 **Q.** -- you were employed by the Post Office as
 7 a Retail Line Manager. You were previously
 8 called a Retail Network Manager.
 9 **A.** Yeah.
 10 **Q.** There was a title change but not a job change --
 11 **A.** Yeah.
 12 **Q.** -- and you'd been employed in the Post Office
 13 since June 1980. Then if we go over the page,
 14 please, you told the court in this witness
 15 statement that your responsibilities include the
 16 monitoring of the overall performance of
 17 subpostmasters against their contracts and
 18 business standards that are laid down --
 19 **A.** Where am I looking? Yeah, okay. Business
 20 standards laid down, yeah, okay.
 21 **Q.** You told the court that you also monitor their
 22 yearly sales and financial performance, together
 23 with gains and losses.
 24 **A.** Mm-hm.
 25 **Q.** You say:

11

1 having a bad balancing time or they were short
 2 of staff, did I know anybody who could help them
 3 with the staffing issues?
 4 **Q.** Could we look, please, at POL00118219.
 5 **A.** Sorry, what am I looking at?
 6 **Q.** It's going to come up on the screen.
 7 **A.** Oh.
 8 **Q.** Look at page 5, please.
 9 **A.** Page 5. Do I scroll it or will it just move?
 10 **Q.** If you just wait a moment, the right page will
 11 be displayed for you. If we scroll down,
 12 please. Can you see this is a witness statement
 13 in your name?
 14 **A.** Yes, yeah.
 15 **Q.** This is one --
 16 **A.** I think --
 17 **Q.** -- of the documents we provided you back in July
 18 to help you make a full and helpful witness
 19 statement. If we scroll up, please, a little
 20 bit more. Thank you. We can see it's dated
 21 16 October 2003?
 22 **A.** Yeah.
 23 **Q.** This is the first witness statement you provided
 24 in the Post Office's claim against Julie
 25 Wolstenholme of the Cleveleys post office, yes?

10

1 "I am responsible for a total of 112 post
 2 offices throughout the North West area of
 3 England."
 4 Just breaking that down, what you told the
 5 court back in October 2003, is it right that
 6 your responsibilities as a Retail Line Manager
 7 included the monitoring of the performance of
 8 subpostmasters as against their contracts and
 9 business standards?
 10 **A.** Yes.
 11 **Q.** And you monitored their yearly sales and
 12 financial performance, together with monitoring
 13 their gains and losses?
 14 **A.** Yes.
 15 **Q.** So is that a fair summary of your
 16 responsibilities as a Retail Line Manager at
 17 this time?
 18 **A.** Yeah, yeah.
 19 **Q.** You told the court in this statement that you
 20 were responsible for 112 post offices.
 21 **A.** Mm. They did change that at a later date. They
 22 took the small -- sorry.
 23 **Q.** Who is the "they" in that sentence?
 24 **A.** Well, the senior management.
 25 **Q.** Okay.

12

1 A. They decided that the larger offices perhaps
2 needed more attention. So the smaller offices
3 were given to another Retail Line Manager.
4 Because they were smaller, they didn't need as
5 many visits, they didn't need as much attention
6 and I think it was that the larger offices just
7 needed a firmer hand than perhaps the smaller
8 offices.

9 Q. So the number after this time, after October
10 2003 came down from 112; is that right?

11 A. Yeah, most definitely. I don't want to swear to
12 it but I think my recollection was I had about
13 27. I've tried to work through them but
14 I really can't remember how many there were
15 exactly.

16 Q. You told us in your witness statement for these
17 Inquiry proceedings, and you've mentioned it
18 this morning, that you were responsible for 27
19 post offices.

20 A. Yeah, that's probably about right.

21 Q. But when are you talking about then?

22 A. Um, when am I talking about then?

23 Q. Ie what date?

24 A. I can't remember. I can't remember.

25 Q. You see in this witness statement here,

13

1 A. And what date was that? What date was that?

2 Q. 16 October 2003, as I told you and as we looked.

3 A. I'm sorry, I can't remember.

4 Q. You think this might be inaccurate, what you
5 told the court, then?

6 A. We had that many. I remember, when they divvied
7 everything up and there were Retail Line
8 Managers and then there were -- I worked closely
9 with another -- a young man and he had the
10 smaller offices; I had the larger offices. But,
11 as to the exact number, it's so long ago I just
12 can't remember.

13 Q. I'll ask one last time. If you made a statement
14 to the court swearing it to be true in
15 October --

16 A. I would have thought that was true at the time.

17 Q. Hold on, if you wouldn't mind. If you let me
18 finish the question then I'll respect you by
19 letting you give a full answer.

20 If you made a witness statement to the court
21 saying that you were responsible in October 2003
22 for 112 post offices, would that be likely to be
23 accurate?

24 A. I can't remember.

25 Q. So you may have written something down that was

15

1 Mrs Cottam, made much closer to the time, in
2 October 2003 and speaking about your time as
3 a Retail Line Manager managing the Cleveleys
4 post office, you told the court that you were
5 responsible for 112 post offices; is that right?

6 A. It was at one time but they changed it and they
7 just left us with -- the more senior ones had
8 the bigger post offices.

9 Q. I'm only interested in what happened in the
10 period between 2000 and 2003. Does it follow
11 that if we were looking at that period of time,
12 ie before this witness statement was made, the
13 accurate position was you were responsible for
14 112 post offices?

15 A. I really can't remember the dates, I really
16 can't.

17 Q. If you were responsible only for 27 post offices
18 in October 2003, you presumably wouldn't have
19 told the court that you were responsible for 112
20 of them, would you?

21 A. I really don't remember.

22 Q. That's not a question about memory; that's
23 asking if you made a sworn statement to the
24 court, which said, "I am responsible for 112
25 post offices", in 2003, that's likely to be --

14

1 inaccurate to the court?

2 A. I would have believed it to be true when I wrote
3 it.

4 Q. Good. What was the nature -- that can come
5 down, thank you -- of your dealings or
6 interactions with the 112-odd post offices that
7 you were responsible for?

8 A. I don't know what you mean. What was the
9 dealings? It was just day to day.

10 Q. Would you go into the post offices?

11 A. Yes.

12 Q. It wasn't just phone contact?

13 A. No.

14 Q. How frequently would you go in to the post
15 offices?

16 A. Depending on the size of the office, it would
17 depend on that and it would depend on which
18 area. I covered quite a few areas. I went as
19 far as Southport. So I would go into Southport
20 for a day and -- or even a week, depending how
21 many there were, to try to get to see them all.
22 You didn't really need -- well, I didn't really
23 need to get to see them all because I could
24 speak to a lot of them on the telephone.

25 They didn't really want you there if they

16

1 were performing correctly but it was my job to
 2 visit them all, as and when I could. Some
 3 needed more visits than others.
 4 **Q.** Averaging things out, how regularly would you be
 5 in contact with each branch?
 6 **A.** Some of them weekly. Some of them monthly.
 7 **Q.** Thank you. As a Retail Line Manager, to whom
 8 did you report?
 9 **A.** Tony Bialchi, he was the -- he was my manager.
 10 **Q.** Where was he based?
 11 **A.** He was based in Preston.
 12 **Q.** Did you have an office in Preston or a base in
 13 Preston or did you work remotely?
 14 **A.** We worked remotely.
 15 **Q.** Were you responsible for managing anyone other
 16 than the subpostmasters?
 17 **A.** No.
 18 **Q.** So the "Manager" part of your title Retail Line
 19 Manager refers to the management of the 112
 20 subpostmasters?
 21 **A.** They split it. They weren't 112 in the end
 22 because it was too many and the smaller offices
 23 were given to another Retail Line Manager.
 24 **Q.** I was working on the basis of the answer you
 25 gave earlier, that this figure of 112 in your

17

1 told the court back in 2003:
 2 "I first met the defendant, Julie
 3 Wolstenholme ... through her father, Mr Jackson
 4 as Mr Jackson was formerly the subpostmaster at
 5 Cleveleys modified sub post office.
 6 Mrs Wolstenholme worked for her father for
 7 a period whilst he was the subpostmaster at
 8 Cleveleys post office."
 9 Is all of that accurate?
 10 **A.** Yes.
 11 **Q.** In paragraph 5 you told the court:
 12 "In 1999, I became aware that Mr Jackson was
 13 ill and that had been trying to sell his post
 14 office. During my discussions with him
 15 regarding the possible sale, we discussed the
 16 possibility of a family transfer being made to
 17 Mrs Wolstenholme. In or about September 1999,
 18 I met with Mrs Wolstenholme, Mr and Mrs Jackson
 19 and Mrs Wolstenholme's former partner, Roger
 20 Harrison at the flat above the post office
 21 premises where we had a general chat about the
 22 possible family transfer of the post office to
 23 Mrs Wolstenholme."
 24 Is that all accurate?
 25 **A.** Yes.

19

1 statement was likely to be correct. We're not
 2 interested in anything that happened, in fact,
 3 after the end of 2003 with you as a witness. So
 4 I'm not asking about how things developed.
 5 **A.** I really don't remember. I mean, if I've put
 6 that in the statement then I must have thought
 7 that at the time but I don't remember having
 8 112.
 9 **Q.** Can you recall being part of the team that
 10 recruited Mrs Wolstenholme, Julie Wolstenholme,
 11 to the position of subpostmaster at Cleveleys
 12 post office and the transfer of the Post Office
 13 from her sick father to her?
 14 **A.** The team? I don't know what you mean about the
 15 team.
 16 **Q.** Were you one of a number of other people that
 17 were involved in the process of transferring the
 18 branch from Mrs Wolstenholme's father to her?
 19 **A.** Yes, I was.
 20 **Q.** Can we look back at your civil statement,
 21 please. It'll come up on the screen. There's
 22 no need to say anything until it does.
 23 POL00118219. Can we go to page 6, please, and
 24 can we -- I think that's page 7. Thank you.
 25 Can we look at paragraph 4, please. You

18

1 **Q.** In paragraph 6, if we scroll down, please, you
 2 say after the meeting you received a letter from
 3 Mr Jackson dated 21 September 1999, and we've
 4 got that, resigning from the post office at
 5 Cleveleys modified sub post office:
 6 "... and requesting that the office be
 7 transferred to Mrs Wolstenholme. A letter was
 8 then sent to Mrs Wolstenholme on 12 October 1999
 9 enclosing an official application form for her
 10 to complete."
 11 You produced those and we've got those:
 12 "In view of the fact that the transfer was
 13 a family transfer, I did not need to have sight
 14 of a business plan nor was there a formal
 15 interview which was again due to the fact that
 16 it was a family transfer and also because
 17 Mrs Wolstenholme had worked at the post office."
 18 Then you set out some other information we
 19 needn't go into. Is all of that accurate that
 20 I've just read to you?
 21 **A.** Yes.
 22 **Q.** Now, I think as part of this process, you
 23 completed an assessment for the post office of
 24 Mrs Wolstenholme's suitability to be
 25 a subpostmaster; is that right?

20

1 A. Yes.
 2 Q. Can we look, please, within the same package of
 3 documents at page 39. Do you recognise the
 4 handwriting?
 5 A. No.
 6 Q. Can we look, please, at page 43. Do you
 7 recognise the handwriting there?
 8 A. Yes, yeah.
 9 Q. Whose handwriting is that?
 10 A. That's mine.
 11 Q. If we scroll down please, we see that you signed
 12 it. Your actual signature is underneath those
 13 words "GRO" -- we're not displaying those so
 14 people will know what your signature is --
 15 saying that Mrs Wolstenholme should be accepted
 16 as a subpostmaster, and you signed it at the
 17 bottom, as well, as the authoriser. Can you see
 18 that?
 19 A. Yes.
 20 Q. Go back, please, to page 39. Can you see the
 21 answers to the questions there? Is that you
 22 writing those in?
 23 A. Yes, I think it must have been.
 24 Q. So the document's title is "Report on Candidates
 25 for Subpostmastership"?

21

1 and personal circumstances. Can we go to
 2 page 41, please, question 4:
 3 "Consider the applicant's knowledge,
 4 experience and achievements, both inside and
 5 outside of work.
 6 "4a. Suitability for counter work
 7 "Clerical/Accounting/Recordkeeping aspects
 8 of the work. Give evidence."
 9 You wrote:
 10 "Julie's experience as a counter clerk and
 11 her substitution when her father is on leave is
 12 evidence that she has the skills needed for this
 13 work."
 14 Then under "Customer Service", you said:
 15 "Again, Julie is dealing with customers and
 16 enjoys working at the counter."
 17 Yes?
 18 A. Mm. Yeah.
 19 Q. Then over the page to page 42, please. If we
 20 look at the bottom half of the page, please.
 21 Question 5c:
 22 "Is the candidate likely to be responsible
 23 in the job? Have you any reason to doubt the
 24 candidate's honesty? Look at previous jobs to
 25 see if responsibility was given/taken. Give

23

1 A. Mm.
 2 Q. Does this document set out your assessment of
 3 the suitability of an applicant or candidate for
 4 the position of subpostmaster?
 5 A. Yes, it was something we would do, for a new
 6 candidate.
 7 Q. If we go to page 41, please. Let's look at
 8 page 40, so we can just see the kind of things
 9 written out by you:
 10 "Origins of plans to be a subpostmaster
 11 "Why did the applicant first think of
 12 becoming a subpostmaster? Whose idea was it?
 13 How well researched is it?" et cetera.
 14 You wrote:
 15 "The applicant currently works part time in
 16 her father's office. His ill health is forcing
 17 his retirement", et cetera.
 18 A. Yeah.
 19 Q. So that's the way it works?
 20 A. Yeah.
 21 Q. There's some pre-printed questions and then you
 22 write the text?
 23 A. Yes.
 24 Q. On these pages, it's essentially an assessment
 25 of the candidate's, here Mrs Wolstenholme, plans

22

1 evidence."
 2 You wrote:
 3 "Julie shows a keen sense of responsibility
 4 on my evidence of having seen her at work.
 5 I have no reason to doubt her honesty."
 6 It looks like you originally wrote "I have
 7 no doubt of her honesty" but changed that to
 8 "I have no reason to doubt her honesty".
 9 A. Mm.
 10 Q. Yes? Is that right: you had no reason to doubt
 11 Mrs Wolstenholme's honesty?
 12 A. That was correct at the time, yeah.
 13 Q. No doubt that's a very important assessment when
 14 considering whether to recommend a candidate for
 15 appointment?
 16 A. Yes.
 17 Q. And no doubt a very important consideration when
 18 deciding whether to take the candidate on?
 19 A. It is but it's very difficult, if you haven't
 20 worked with them for very long. I mean, you
 21 know, any time when you're interviewing
 22 a subpostmaster, you have to take a lot of
 23 what -- you can't test their honesty in
 24 an interview. You can only go off -- I mean
 25 it's different in Julie's case because she'd

24

1 been working with her parents.

2 **Q.** It was on the basis of that evidence that you

3 had no reason to doubt her honesty, presumably?

4 **A.** Yes.

5 **Q.** When, a few months later, you're deciding

6 whether to suspend and then terminate

7 Mrs Wolstenholme, do you bring this information

8 into account: that you spoke to her honesty just

9 a few months before?

10 **A.** Yes. I had to -- as it was later, Julie was the

11 subpostmistress and she worked very closely --

12 which I wasn't aware of at the time but I soon

13 picked up on when I was going to the office --

14 she worked very closely with her husband and he

15 was heavily involved in the day-to-day running

16 of the office. And that was not taken into

17 consideration because I wasn't aware that that

18 was going to be the case when Julie was

19 appointed.

20 **Q.** Why are you telling us this?

21 **A.** Because it's -- I think it's relevant.

22 **Q.** Why do you think it's relevant?

23 **A.** Because -- well, I'd rather not say. I've no

24 proof of what I want to say.

25 **Q.** What do you want to say? Go on, tell us?

25

1 "I feel Julie will be successful in this

2 venture. She has had a good grounding having

3 worked in the office and also drawing on her

4 father's experiences. She sees the need to move

5 forward towards a better retail environment in

6 the office. She is already considering

7 streamlining the staff as she identified

8 excessive hours being used. Long term I feel

9 she will make a good office better."

10 Then:

11 "Julie is committed to becoming

12 a subpostmaster. She enjoys the work. She has

13 the full support of all her family which will

14 help her thorough her difficult induction as

15 a subpostmaster. She has shown a great

16 enthusiasm for Horizon and is keen to take the

17 office forward and make a successful business

18 for her and her family."

19 That was your overall assessment of

20 Mrs Julie Wolstenholme, yes?

21 **A.** Yes. Yeah.

22 **Q.** So you were positively and rather strongly

23 recommending her for appointment; is that right?

24 **A.** I recommended her, yes.

25 **Q.** We can see that an offer was made -- if we go to

27

1 **A.** No. I would rather not.

2 **Q.** Are you hinting that you think he was the

3 dishonest one, not her?

4 **A.** I'd rather not say.

5 **Q.** Was that --

6 **A.** I've no proof at all of that. But he was

7 heavily, heavily involved in the day-to-day

8 running and the financial aspects of that

9 office.

10 **Q.** Did you have this suspicion without proof at the

11 time?

12 **A.** Yeah, I still have no proof of it.

13 **Q.** But did you have the suspicion without proof

14 back in 2000 --

15 **A.** Yes.

16 **Q.** -- when you terminated her contract?

17 **A.** I didn't terminate her contract on that;

18 I terminated her on the balance of the evidence

19 that I had.

20 **Q.** Was that in your mind when you terminated?

21 **A.** No. It was on the evidence that the office

22 wasn't being run properly but I had no evidence

23 of who was not running it.

24 **Q.** Can we go to page 43, please. Your "Overall

25 Assessment". You said:

26

1 page 44 -- to Mrs Wolstenholme for the

2 subpostmastership of Cleveleys on 9 November

3 1999, yes?

4 **A.** Yes, I can't see that far down there. Oh, yeah

5 9 November.

6 **Q.** First sentence:

7 "I am delighted to inform you that your

8 application ... has been successful."

9 **A.** Yeah.

10 **Q.** The date is in the top right, 9 November 1999?

11 **A.** Yeah.

12 **Q.** Then within a couple of months after that, is it

13 right that the Horizon system was installed into

14 this branch?

15 **A.** I don't remember the date.

16 **Q.** Can we look, please, at page 7 of this bundle.

17 This is your statement to the civil court back

18 in 2003.

19 **A.** I didn't know there was a civil court. The

20 first I knew that there'd been a court case was

21 when I got this bundle of documents.

22 **Q.** You provided this witness statement to the civil

23 court?

24 **A.** I don't remember doing that.

25 **Q.** It's got your name and your signature on it.

28

1 **A.** It may have but I don't remember doing it.
 2 **Q.** Let's see whether what you're recorded as having
 3 written is accurate. Paragraph 8, you deal with
 4 the report we've just looked at. I've actually
 5 looked at some of the things you've said,
 6 whereas this statement doesn't include anything
 7 about your positive recommendation but let's go
 8 to paragraph 9. Thank you.

9 There's the letter that we've just looked
 10 at, the 9 November -- it says 2003 here, it's
 11 1999 in fact -- letter, yes?

12 **A.** Yeah.

13 **Q.** Then paragraph 10, you said:

14 "In the early part of 2000, the Post Office
 15 installed the Horizon computer equipment at its
 16 post offices and sub post offices. The
 17 installation of Mrs Wolstenholme's post office
 18 was completed on or about 9 February 2000."

19 If you told the civil court that in this
 20 witness statement, is that likely to have been
 21 accurate?

22 **A.** It's likely to have been, yes.

23 **Q.** You continue:

24 "The original installation had been aborted
 25 on the day of installation due to problems with

29

1 Is that all accurate?

2 **A.** Yeah. Two helplines, the staff had two
 3 helplines: Horizon Helpdesks and the other one
 4 was the Network Business Support Centre. Yeah,
 5 yeah.

6 **Q.** Okay can we go over the page, please, to
 7 paragraph 12. You told the court:

8 "Mrs Wolstenholme persisted in telephoning
 9 the Horizon ... Helpdesk in relation to any
 10 problems which she had with the system and
 11 generally, these problems related to the use and
 12 general operation of the system and were not
 13 technical problems relating to the system.
 14 Copies of the call logs for the period
 15 10 January 2000 to 30 November 2000 together
 16 with a brief analysis of the calls to the
 17 Horizon System Helpdesk which I prepared
 18 following Mrs Wolstenholme's suspension are at
 19 pages [then you give some pages to an exhibit].
 20 Whilst there were some problems at other
 21 branches, they were not insurmountable and were
 22 often due to the system crashing or were general
 23 teething problems."

24 Just dealing with problems at the Cleveleys
 25 post office with Horizon first and then turning

31

1 the ISDN line."

2 So was it right that there were problems
 3 with Horizon at Cleveleys from the very first
 4 day?

5 **A.** You can't say that. You can say there were
 6 problems with the ISDN line.

7 **Q.** So you --

8 **A.** It's the installation of the line. I can't say
 9 there were problems with the Horizon from that
 10 day. It says there it was due to problems with
 11 the ISDN line.

12 **Q.** Let's scroll down, then. Paragraph 11, you told
 13 the court that:

14 "Following the installation of [Horizon],
 15 postmasters, subpostmasters and their staff had
 16 two helplines which they could call in the event
 17 of any problems. One was the Horizon System
 18 Helpdesk [which I'm going to call HSD], which
 19 dealt with technical problems encountered with
 20 for example the system crashing or in relation
 21 to the hardware or software. The other helpline
 22 was the Network Business Support Centre [which
 23 I'm going to call NBSC] which was run by the
 24 Post Office which dealt with the general use and
 25 working of the system."

30

1 to the last sentence there, problems at other
 2 branches, in a moment. You, in this statement,
 3 exhibited, attached to this witness statement,
 4 call logs from the Horizon helps for a period of
 5 10 January 2000 until November 2000, 30 November
 6 2000, yes?

7 **A.** I don't remember getting these call logs.

8 I think I've got them in the bundle now. But
 9 I don't remember asking for the call logs.

10 **Q.** It seems that you had them by the time you made
 11 this witness statement in October 2003 because
 12 you attached them to your witness statement and
 13 said, "They're my exhibit EMT1", "M" being your
 14 middle name or the first letter of your middle
 15 name, yes?

16 **A.** Yeah, I don't remember them. I've got them in
 17 the bundle now but I don't know why I would need
 18 them, really.

19 **Q.** You mean you --

20 **A.** I wouldn't really understand them.

21 **Q.** In any event --

22 **A.** They were -- they were technical issues, I mean,
 23 you know, due to the system crashing or general
 24 teething problems. But I couldn't do anything
 25 with that.

32

1 Q. Mrs Cottam, you're getting a bit ahead of where
2 we want to go. At the moment, I'm just asking
3 you the question that you appear, is this right,
4 in a statement made to the court in October 2003
5 to have exhibited some Horizon Helpdesk call
6 logs as your exhibit EMT1, and --

7 A. Which court was this? I haven't been to court.

8 Q. No, it never reached court. Post Office
9 settled.

10 A. Oh, right, well -- I didn't even know there'd
11 been any sort of court case until I got this
12 bundle of documents.

13 Q. We've got a witness statement from you signed
14 with a witness statement of truth, which says,
15 "I attached to this witness statement 84 pages
16 of call logs and my analysis of them". Okay?
17 Let's start on the basis that that is what this
18 document shows. So these 84 pages of Helpdesk
19 records and your analysis of them are just --

20 A. I do not remember that at all.

21 Q. Maybe I wouldn't blame you because it's 20 years
22 ago, almost to the day.

23 A. Yeah, right. I don't remember. I don't
24 remember that at all. I mean I'm sure --
25 28 pages? I just --

33

1 why were you telling court what the Helpdesk's
2 records showed when you --

3 A. Because that's what the Helpdesk would have
4 shown me.

5 Q. Let's just --

6 A. I don't understand these. Don't understand
7 them. I don't know what it's saying, "Gateway
8 is now stuck at 3%". That means nothing to me.

9 Q. As I said, in about half an hour or so, I'm
10 going to be asking you some questions about
11 that?

12 A. Oh, right.

13 Q. Let's just look at what the documents are to
14 start with, if we can, Mrs Cottam. You see, the
15 first one on this page, 9 February, over the
16 page, please, another call on 9 February. Over
17 to the next page, please, another call on
18 9 February. Page 161. Sorry, page 51 --

19 A. What --

20 Q. -- another call on 9 February, yes? The date of
21 installation. Over the page.

22 A. What am I looking at the -- what am I supposed
23 to be looking at these?

24 Q. All I'm doing at the moment is reminding you of
25 the number and nature of the Horizon Helpdesk

35

1 Q. No, it's 84 pages --

2 A. No.

3 Q. -- between pages 28 and 112, and I'm going to
4 look at them, if we may. So if we turn to
5 page 48 in this bundle, this is the first page
6 of that exhibit, EMT1. Okay?

7 A. The first I've seen of these is when I got this
8 bundle of papers. I haven't seen these before.

9 Q. You didn't see them back in 2003 when you were
10 making this witness statement to the court?

11 A. Not that I remember.

12 Q. In any event, they're attached to your witness
13 statement made to the court, and the first of
14 them is dated 9 February 2000; can you see that?

15 A. Yes, I can see that.

16 Q. Basically, over the next 84 pages there are
17 further call logs and then an analysis of them
18 had you prepared, according to your witness
19 statement at the time?

20 A. I don't remember making any analysis of this at
21 all, I just don't remember having to analyse
22 these at all. I don't think I would really
23 understand it.

24 Q. That's one of the things I'm going to be asking
25 you about in probably about half an hour's time:

34

1 call logs that you exhibited to your witness
2 statement on 16 October 2003.

3 A. Well, I would have requested these. I wouldn't
4 have seen them. I don't remember these at all.

5 Q. Let's carry on. 10 February, so we've got
6 a handful on the day of installation, the 9th,
7 and then more on 10 February and then, over the
8 page, another call on 10 February.

9 Over the page, another call on 10 February.

10 Over the page, another call on 10 February.

11 Over the page, another call on 10 February.

12 Over the page, another call on 10 February.

13 Over the page, another call on 10 February.

14 And so it goes on, do you see?

15 A. Yeah.

16 Q. Then if we go forwards to the --

17 A. Who's the caller on this? Mr Harrison. But
18 he's not the postmaster, is he?

19 Q. What's your point?

20 A. Well, he doesn't feature very heavily anywhere,
21 does he? And yet his name's on all these now.

22 Q. What's your point?

23 A. Well, it says, "Title: Postmaster", and he
24 wasn't, was he?

25 Q. What's your point?

36

1 A. Well, he's not the postmaster. So is that
2 correct?
3 Q. What do you mean: is it correct?
4 A. Well -- well, nothing. It doesn't matter.
5 Q. Is this the suspicion without proof issue
6 raising its head again?
7 A. I'm not going down that line at all.
8 Q. I thought you just did?
9 A. Well, I'm just saying here it says that the
10 caller was Mr Harrison and he's the postmaster
11 and he wasn't.
12 Q. If we go to the last of the documents in your
13 exhibit, if we look at page 115, please. You'll
14 see this is dated 21 June 2000 and the caller is
15 Julie, the postmaster. Yeah?
16 A. Yeah.
17 Q. In your witness statement, you said that you
18 were exhibiting the calls, if you remember.
19 A. No, I don't remember.
20 Q. All right, well, I'll read it out to you.
21 A. Okay.
22 Q. Between the period 10 January 2000 until
23 30 November 2000 -- in fact, the calls that were
24 exhibited are between 9 February 2000, the day
25 of installation, and the last one is on 21 June

37

1 witness statement start at page 48.
2 A. I'm sorry, I'm lost.
3 Q. That's why I haven't asked you to look at any
4 documents in a pack in front of you because
5 people tend to get lost and, instead, I've
6 displayed them on the screen.
7 A. Page 48 of what am I looking at? Because my
8 page 48 is just about general subpostmasters.
9 It's not -- I don't know what I'm looking at.
10 Q. Shall we just stick to the documents I'm
11 displaying on the screen, then.
12 A. Yeah, but -- yeah, yeah.
13 Q. Good. Where might you have gone in October
14 2003 -- I'm sorry if you find this
15 uncomfortable.
16 A. I'm sorry. Can I just have a break at the
17 moment here because I don't -- I'm not
18 remembering any of this. Can you just give me
19 five minutes, please?
20 **SIR WYN WILLIAMS:** Yes, of course.
21 **MR BEER:** Of course.
22 I wonder whether we might take a 15-minute
23 break now.
24 Ah, sir, you're back. I wonder if we might
25 take a 15-minute break now.

39

1 2000. Do you understand the point I'm making at
2 the moment? Your witness statement said calls
3 are between 10 January to 30 November and the
4 calls that you've, in fact, exhibited are
5 between 9 February and 21 June.
6 A. I don't remember.
7 Q. Where would you have got these documents from?
8 A. I don't know. I don't know. I don't remember
9 this at all.
10 Q. If you were approached in 2003 to make a witness
11 statement, and we know that you did, and one of
12 the things that you did was attach to your
13 witness statement a series of calls and call
14 logs, how would you have got those?
15 A. I don't know.
16 Q. Can you try and help us as to --
17 A. I will try and help but I don't -- I just don't
18 know. Is that -- is this -- are these things in
19 this bundle that I was sent?
20 Q. Yes, both the witness statement I'm quoting from
21 and your exhibit to it.
22 A. What page is that, please?
23 Q. It's in tab D7. The bit of your witness
24 statement I'm reading from is at page 8 of tab
25 D7 and the call logs that you exhibited to your

38

1 **SIR WYN WILLIAMS:** Yes, by all means.
2 **MR BEER:** Thank you, sir.
3 **SIR WYN WILLIAMS:** It's not normally something that
4 I would say openly at this stage but this is
5 a very unusual situation. It's certainly in my
6 mind that the most likely explanation for this
7 witness statement is that the documents that
8 you've just been looking at were obtained for
9 the lady and it may perhaps be fruitful, I'm
10 only making a suggestion, to take her directly
11 to her analysis to see if, in fact, at some
12 stage she did analyse the documents.
13 **MR BEER:** Yes. That was the next series of
14 questions --
15 **SIR WYN WILLIAMS:** I'm sure they were but she's
16 becoming so confused about things, I think,
17 Mr Beer, that your methodical approach may be --
18 it may be more easily achieved by just asking
19 her directly about the analysis because, if she
20 acknowledges that she did make an analysis, at
21 least we've got that. If she doesn't
22 acknowledge that, then I don't know where we go
23 from there.
24 **MR BEER:** Sir, just so you know where this is going,
25 we're in possession of some significant call

40

1 logs that weren't exhibited that involve
 2 Ms Tagg, as she then was, Mrs Cottam now, in
 3 liaison with the Helpdesk complaining over
 4 problems with the Horizon and the issue to be
 5 explored is why wasn't that revealed to the
 6 civil court.

7 **SIR WYN WILLIAMS:** Yes, all right. Well, then I'll,
 8 as they say, butt out.

9 Mrs Cottam, we've decided we're going to
 10 have a 15-minute break now --

11 **MR BEER:** I think she's gone already, sir.

12 **SIR WYN WILLIAMS:** No, no, she's back on my screen.

13 **THE WITNESS:** No, I'm here.

14 **SIR WYN WILLIAMS:** So we normally have a break at
 15 about now, so we're going to have a 15-minute
 16 break now and you compose yourself, all right.
 17 I know this is difficult for you. But we'll
 18 come back again in 15 minutes and Mr Beer will
 19 ask you some more questions then, all right?

20 **THE WITNESS:** Right. Thank you.

21 (10.57 am)

22 (A short break)

23 (11.14 am)

24 **MR BEER:** Sir, good morning, can you continue to see
 25 and hear me?

41

1 involved in -- if I had to write to any Post
 2 Office, because I wasn't, like -- I didn't have
 3 any in-depth knowledge of the contract between
 4 subpostmasters and the Post Office, you know,
 5 the contractual, legally-binding stuff, I always
 6 got them to draft the letter for me. So I may
 7 well have signed it but the content would have
 8 been through the Contracts Manager.

9 **Q.** Okay, this isn't a letter written by you; this
 10 is a witness statement made by you to the court.

11 **A.** Yeah. I don't remember this at all. I don't
 12 remember it.

13 **Q.** Do you remember seeing a solicitor?

14 **A.** No. I went to -- the only time I've been to see
 15 a solicitor was about a couple of months ago and
 16 that was only on -- I don't remember seeing
 17 a solicitor at all.

18 **Q.** So you think somebody else may have written this
 19 statement and you signed it?

20 **A.** If it's about contracts and things like that,
 21 they would have drafted it for me, definitely.

22 **Q.** The "they" is Paul or Rebecca; is that right?

23 **A.** Yeah, well, it may have been but it would have
 24 been through the area -- the area office, the
 25 district office, because I -- any letter that

43

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

2 **MR BEER:** Mrs Cottam can you see and hear me?

3 **A.** Yes, I can.

4 **MR BEER:** Thank you, can we have on the screen,
 5 please, POL00118219, and look at page 8, please,
 6 and highlight paragraph 12, please. This was
 7 the paragraph that we looked at earlier of your
 8 civil statement to the court and, in the fourth
 9 line, you said:
 10 "Copies of the call logs for [those dates]
 11 together with a brief analysis of the calls ...
 12 which I prepared ... are at", then you give some
 13 page numbers.

14 Do you see that?

15 **A.** I do, but I didn't write all this.

16 **Q.** Who wrote it?

17 **A.** I know I was heavily involved with the Contracts
 18 Manager, who was called Paul, but I didn't write
 19 all this.

20 **Q.** You said you were heavily involved with the
 21 Contracts Manager, Paul?

22 **A.** Yeah.

23 **Q.** What was Paul's surname?

24 **A.** I think it was Paul Williams. There was also
 25 somebody called Rebecca Robinson. She was

42

1 was like that, I would have always put through
 2 them first, because they would know the
 3 technicalities of it, "Oh you can't say that",
 4 or "You've got to quote this", or "You've got to
 5 quote the other". So I may well have signed
 6 lots of letters.

7 **Q.** Again, just to be clear, this isn't a letter;
 8 this is a witness statement to the civil court
 9 with your name on it and you --

10 **A.** The civil court?

11 **Q.** Yes, the Blackpool County Court.

12 **A.** I don't remember that. I don't remember that at
 13 all. The first I knew that there'd been any
 14 sort of court case was when I got this bundle of
 15 documents.

16 **Q.** Well, in this document, which has got your name
 17 at the beginning of it, your name at the end of
 18 it and your signature on it, it says,
 19 "I prepared an analysis of the call logs"; can
 20 you see that?

21 **A.** Yeah.

22 **Q.** It's the bit that's highlighted.

23 **A.** I would not -- I would not have prepared --
 24 I may well have signed it and not really
 25 understood what I was signing it, but I wouldn't

44

1 understand the analysis of the call logs.
 2 **Q.** Let's just look at the analysis of the call
 3 logs. They start at page 118. It's going to
 4 come up on the screen for you.
 5 **A.** Yeah, I've got them all here.
 6 **Q.** Can you see a reference number is given in the
 7 first column; the status of the call, whether
 8 it's closed or open, is given?
 9 **A.** Yeah.
 10 **Q.** Priority and severity is rated; when the call
 11 was opened and closed is given?
 12 **A.** Yes.
 13 **Q.** Which FAD, which branch or site --
 14 **A.** Yeah.
 15 **Q.** -- et cetera. Then, on the right-hand side, two
 16 columns in, is the problem --
 17 **A.** Problem.
 18 **Q.** -- text and then the closure text; can you see
 19 that?
 20 **A.** Yeah.
 21 **Q.** Did you remember this?
 22 **A.** No, I would never see these. No. Never seen
 23 them until I got this bundle.
 24 **Q.** Can you help us as to how it came about that
 25 there's a witness statement to the Blackpool

45

1 **A.** I don't think it was the kind of thing I would
 2 have got involved in because I'd never used
 3 Horizon. So I didn't know how to use it. So,
 4 if they were asking questions about it,
 5 I wouldn't have been able to answer.
 6 **Q.** Okay. Can we just look at some documents, then,
 7 some underlying material, to see what the
 8 position was back in 2000, and the purpose of me
 9 asking you these questions, just so that you
 10 know in advance, is when we come to the
 11 suspension and termination decisions, I want to
 12 ask you some questions about your own personal
 13 knowledge of problems with Horizon and the
 14 extent to which that was brought into account in
 15 decision making. Okay? That's why I'm asking
 16 you about these issues.
 17 Can we start, please, with FUJ00121246.
 18 I'm sorry, Mrs Cottam, there's just a delay
 19 in this end in displaying the document.
 20 **A.** Okay.
 21 **Q.** Thank you. Can we expand the top part. Can you
 22 see this is a record of a call, it's to the
 23 Horizon Helpdesk, opened on 24 February 2000 and
 24 closed on 1 March 2000. Can you see that at the
 25 top there?

47

1 County Court in your name and signed by you as
 2 true, which says, "I prepared this analysis"?
 3 **A.** No. No, I can't because I don't ever remember
 4 seeing it. I mean, it was a long time ago.
 5 I may well have done it but I really don't,
 6 I just wouldn't understand it.
 7 **Q.** Okay I'll take those down, then, please. Can we
 8 go back to the statement that you provided to
 9 this Inquiry -- it'll come up on the screen for
 10 you -- WITN09530100, and it's the second
 11 paragraph from the bottom.
 12 Against "Para (4)", that's paragraph 4 of
 13 our questions to you, where we'd asked you
 14 whether you had any direct involvement with the
 15 Helpdesk, you said:
 16 "I don't remember having any direct
 17 involvement with the Helpdesk."
 18 **A.** No.
 19 **Q.** By that, did you mean that you may have had
 20 involvement with the Helpdesk but just because
 21 of the passage of time you may not now remember,
 22 or --
 23 **A.** Yeah, I don't remember.
 24 **Q.** -- you don't think it's the kind of thing you
 25 would have got involved in?

46

1 **A.** Yeah.
 2 **Q.** Can you see the caller is shown as Ms Tagg?
 3 **A.** It is, yeah.
 4 **Q.** That's you and your maiden name; is that right?
 5 **A.** It is, yeah. I don't remember making that call,
 6 obviously. It's so long ago.
 7 **Q.** The problem text that's recorded is:
 8 "Couldn't print due to a session being
 9 suspended last night, has rolled [stock unit]
 10 and the office into the next week. Rebooted to
 11 clear the problem."
 12 **A.** Yeah.
 13 **Q.** Then --
 14 **A.** I wouldn't have done that, though. Because
 15 I wouldn't have known how to reboot or roll or
 16 ... that's probably what happened but
 17 I personally would not have done that.
 18 **Q.** So why would you be calling in the Helpdesk?
 19 **A.** Why would I be calling them? To ask them how to
 20 do whatever it was they were doing. But I would
 21 get the subpostmaster to do it.
 22 **Q.** But this is you calling in. Why would you be
 23 calling --
 24 **A.** Yeah.
 25 **Q.** -- the Helpdesk?

48

1 A. Because I would have been at the office trying
 2 to help them sort out whatever it was.
 3 Q. Why wouldn't the subpostmaster call in?
 4 A. Well, she probably did --
 5 Q. No, she didn't. You did.
 6 A. -- or he did. We were looking for some advice
 7 from somebody.
 8 Q. Sorry, did you say "or he did"?
 9 A. I don't know, I can't remember.
 10 Q. Was that slipping into the suspicion without
 11 proof thing again.
 12 A. Well, I wouldn't like to say.
 13 Q. Well, but you just did.
 14 A. Well, I'm sorry I did.
 15 Q. Anyway, this is a record of a call made at 8.05
 16 in the morning by you, and I'm asking why would
 17 you be calling in?
 18 A. Because they probably would have rung me and
 19 said that "We've not been able to roll over and
 20 what can we do?" So I only lived locally, so
 21 I went. I must have gone.
 22 Q. Okay. If we look at under all of that black and
 23 grey text into the call activity log, I wonder
 24 if it can be highlighted. First line:
 25 "New call taken by Andrew Abernethy.

49

1 for them but I can't say I remember that on
 2 24 February in the year 2000, no, I can't.
 3 Q. Okay, let's go to FUJ00121296. Again, there's
 4 a problem displaying the document, so we may
 5 have to wait a little bit.
 6 If we can expand that a little bit, please.
 7 Can you see this is a record of a call made on
 8 Friday, 31 March 2000 at 5.35 in the evening and
 9 the caller is Elaine Tagg, the RNM, the Retail
 10 Network Manager; can you see that?
 11 A. Yeah, I can.
 12 Q. The problem is recorded as:
 13 "The system keeps crashing and IS DOING 3 or
 14 4 times a day and is getting worse. They have
 15 had several base units installed but the problem
 16 persists."
 17 Yes?
 18 A. Yeah, I don't remember making this call.
 19 I don't remember making this call. I might well
 20 have done and, if that's what they said and my
 21 name's on it, fine. But I don't remember it.
 22 Q. That can come down, thank you.
 23 The first call record we looked at was very
 24 shortly after the system was installed,
 25 a fortnight or so, and then this one was a month

51

1 Couldn't print due to a session being suspended
 2 last night, has rolled the [stock unit] and the
 3 office into the next week. Rebooted to clear
 4 the problem."
 5 Then three lines on, four lines on:
 6 "She would like this investigated as the
 7 gateway needs rebooting about 3 or 4 times
 8 a week as it keeps freezing ... can't touch
 9 anything on the screen (no hourglass spinning)."
 10 A. Are they saying I said that, because I don't
 11 remember saying that.
 12 Q. I wouldn't expect you to remember 23 years on.
 13 You --
 14 A. But I don't think I would do that. I don't
 15 think I knew how to reboot, or ... but if that's
 16 what they say, that's what they say. I can't
 17 ...
 18 Q. So this is the first record that I can see of
 19 you being recorded as calling in and raising
 20 an issue or complaining about a Horizon system
 21 fault or problem. Your present recollection is
 22 that you don't remember ever doing that; is that
 23 right?
 24 A. If -- I don't remember it. But it's likely that
 25 would have gone and tried to sort something out

50

1 later, with, on both occasions, you being
 2 recorded as "system crashing three or four times
 3 a week, gateway needing rebooted".
 4 A. I don't remember that. I wouldn't know what
 5 gateway rebooting meant.
 6 Q. When you came to make decisions about suspension
 7 of Mrs Wolstenholme in November, would you have
 8 taken into account your knowledge of problems
 9 with the system that you yourself had reported?
 10 A. I think we would have taken into account that
 11 the system -- you know, they were saying the
 12 system wasn't right and this wasn't working but
 13 that was not the basis. The basis -- if
 14 I recall correctly, the basis of why the
 15 contract was terminated is that they refused to
 16 use the Horizon system and they refused to repay
 17 the losses.
 18 Q. They refused to use the Horizon system because
 19 I kept crashing and needed rebooting and it was
 20 giving them problems with balancing and
 21 shortfalls, correct?
 22 A. I don't know if that's correct or not. That's
 23 what they said but I don't know that what they
 24 said was correct.
 25 Q. If we just go back to your civil statement,

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1 POL00118219, at page 8 and paragraph 12. You
 2 said:
 3 "Mrs Wolstenholme persisted in telephoning
 4 the [HSD] ..."
 5 Yes?
 6 **A.** Yes.
 7 **Q.** You don't refer in this statement to any of the
 8 calls that you made to the Horizon Helpdesk and
 9 instead seem to give the impression that this is
 10 Mrs Wolstenholme persisting, ie perhaps
 11 unnecessarily bothering, the Horizon Helpdesk;
 12 is that correct, that that was the impression
 13 you were trying to convey?
 14 **A.** I wasn't trying to convey any. That's what she
 15 did.
 16 **Q.** You only speak in this statement about
 17 Mrs Wolstenholme phoning in and you use the word
 18 "persisting" or "she persisted"?
 19 **A.** Mm.
 20 **Q.** You don't refer to you calling in identifying
 21 problems?
 22 **A.** Well, I wouldn't have been there every time the
 23 problems occurred.
 24 **Q.** Would there be any reason why you didn't refer
 25 in this witness statement to you reporting

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1 These have not been transferred across to [stock
 2 unit] RJ but are showing on the adjust stock
 3 screen. Balance snapshot correct."
 4 Then a couple of lines on "Advice":
 5 "[Postmaster] advised that this is
 6 an intermittent problem occurring since the
 7 counters were upgraded on 23 October."
 8 Then over the page, please, third line.
 9 "Repeat Call":
 10 "[Postmaster] phoned back and still has not
 11 heard from anyone. Voiced Phil at SMC ..."
 12 Do you remember what the SMC was?
 13 **A.** No.
 14 **Q.** The second line of support:
 15 "... as soon as he can. Advised
 16 [postmaster] of this."
 17 Then two lines on:
 18 "Repeat Call: still awaiting a reply --
 19 getting very upset -- waiting to balance and get
 20 to family, etc."
 21 Two lines on:
 22 "Information: HSH contacted SMC for update,
 23 advised call is with SSC ..."
 24 Do you remember what the SSC was?
 25 **A.** No.

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1 problems about Horizon to the Helpdesk?
 2 **A.** No.
 3 **Q.** Can we look, please, at FUJ00055145.
 4 Display problem again, we'll be back with
 5 you shortly.
 6 This is a PinICL, as it's called, opened on
 7 2 November 2000 and closed on 7 November 2000.
 8 Do you know what a PinICL is? Do you recall
 9 what a PinICL is?
 10 **A.** No.
 11 **Q.** Had you ever heard the phrase before?
 12 **A.** No.
 13 **Q.** You'll see it's dated 2 to 7 November 2000, so
 14 two or three weeks before Mrs Wolstenholme was
 15 suspended on 30 November 2000. You understand?
 16 **A.** Yeah.
 17 **Q.** Let's look at what it records by looking at
 18 activities. In the third line:
 19 "PM has noticed that the adjust stock
 20 figures from shared [stock unit] AA are showing
 21 in shared [stock unit] RJ and vice versa.
 22 [Postmaster] viewed the adjust stock figures in
 23 [stock unit] RJ and it showed 20 [times] £20
 24 smartcreds, that were remmed into [stock unit]
 25 AA on [a time and date with a session ID].

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1 **Q.** We know it as the third line of support:
 2 "... will be dealt with [as soon as
 3 possible]."
 4 Then three lines on:
 5 "Follow Up: RNM Elaine Tagg [that's you]
 6 called re the call she is on her way to the
 7 office and wants updating on the situation.
 8 "Spoke to [reference] Cath on third line
 9 [I think that's the third line of support] who
 10 [advised] she will check who is working on the
 11 call and get them to ring the office [as soon as
 12 possible] message relayed back to the [Retail
 13 Network Manager].
 14 [Retail Network Manager] not very happy with
 15 response."
 16 Do you recall this kind of event where there
 17 would be a problem at the Cleveleys branch, you
 18 would go round to the branch -- recorded here
 19 you're on your way to the office -- and you
 20 would be calling in complaining about the
 21 response of the Helpdesks?
 22 **A.** No.
 23 **Q.** Would you accept that --
 24 **A.** I wouldn't really have known unless they told me
 25 when I got there. If the helpline hadn't called

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1 me, which I don't think they would have done,
 2 I wouldn't have known until I got to the office.
 3 They would've had to tell me that they'd been on
 4 to the call line -- the helpline.

5 **Q.** Okay, this has got you calling in to the third
 6 line of support.

7 **A.** Yeah, so I must have called them because --
 8 well, I don't -- well, they must have asked me
 9 to go to the office and wanted an update.

10 **Q.** Anyway, you're recorded as not being very happy
 11 with the response of the Helpdesk; do you see
 12 that?

13 **A.** Yeah. Well, I can't remember why now, it's that
 14 long ago.

15 **Q.** No. If we go over the page, please. At the top
 16 of the page, first line, halfway through:
 17 "Advised [postmaster] needs to contact NBSC
 18 and let them know of the situation as they will
 19 probably not be able to do a cash account."

20 **A.** I don't know what that means.

21 **Q.** Can you recall what the NBSC was?

22 **A.** No.

23 **Q.** Can you recall what doing a cash account was?

24 **A.** Yeah, yeah.

25 **Q.** What was doing a cash account?

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1 final balance is showing to be correct.
 2 "One of the [stock units] had something
 3 added to it, whilst rolling over."
 4 Can you remember what rolling over was?

5 **A.** Yeah.

6 **Q.** What was rolling over?

7 **A.** You would balance on the Wednesday night and
 8 then you rolled it over to the Thursday to start
 9 afresh. So that was like -- say that was
 10 Week 1, Week 1 would be ended, you'd roll it
 11 over into Week 2.

12 **Q.** This is a Thursday morning -- take it from me
 13 that 2 November 2000 was a Thursday.

14 **A.** Yeah, sometimes they did it on a Wednesday
 15 night.

16 **Q.** If, when rolling over, the system added
 17 something to a stock unit whilst rolling over,
 18 that would be a problem, wouldn't it?

19 **A.** Well, I've never come across that.

20 **Q.** Do you accept that's what this is recording?

21 **A.** The system couldn't add something to it.

22 **Q.** It just couldn't?

23 **A.** Someone or something must have added something
 24 to it. You know, you're just rolling it over.
 25 You know, you're rolling £100 over, it should

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1 **A.** It was doing the weekly balance.

2 **Q.** Reading on:
 3 "Repeat Call: RNM calling they have called
 4 a few times now ..."

5 **A.** Hang on. I can't find that, where is that?

6 **Q.** Just after the passage that's highlighted, the
 7 next line, that's it:
 8 "RNM calling [that's you] they have called
 9 a few times now expecting a call back with info
 10 and no one has called them, the office is closed
 11 but they're waiting for a call."
 12 Reading on:
 13 "Repeat Call: voiced EDSC, while speaking to
 14 them PM terminated call.
 15 "The call summary has been changed ...
 16 "[Postmaster] has noticed that the adjust
 17 stock figures from [has been changed to] adjust
 18 stock figures from shared."
 19 Then reading on, so five lines on:
 20 "Contacted the RNM [that's you] for this
 21 office as she has now made a complaint regarding
 22 this issue.
 23 "Elaine [Retail Network Manager] advised
 24 that all [stock units] have now been rolled over
 25 and they are now checking them to see if the

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1 show £100 in the next week that you're starting
 2 with, it's --

3 **Q.** This is recording you lodging a complaint at
 4 a failure of the Helpdesk to deal with the issue
 5 and you telling the Helpdesk that one of the
 6 stock units had something added to it whilst
 7 rolling over.

8 **A.** Mm.

9 **Q.** That's not Mrs Wolstenholme or Mr Harrison
 10 adding something to the stock unit, somebody
 11 adding something. You're telling the Helpdesk
 12 here that there's a problem with the system,
 13 aren't you? A stock unit has had something
 14 added to it.

15 **A.** Well, yeah. How it was added to it is another
 16 matter.

17 **Q.** No, and that's what you're -- if we continue:
 18 "Elaine [that's you] was very annoyed that
 19 no one from 3rd line had called her back, as she
 20 has been promised number of callbacks."
 21 Then over the page, please:
 22 "Apologised for her not receiving any
 23 callbacks and advised that I would escalate the
 24 fact that the agents she has spoken to have
 25 promised callbacks within the hour, as they

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1 should not be making promises like these.
 2 "Advised her that 3rd line are very busy
 3 with their investigations and sometimes do not
 4 have time to call back.
 5 "They may call back sometimes if they
 6 require additional information/actions ...
 7 "Advised that I would monitor the call, and
 8 if any updates occurred, I would notify them."
 9 Then there's some information about
 10 assigning it to a team member. Then, if we read
 11 on a little bit, four lines, under "Response",
 12 can you see that?
 13 **A.** Yeah.
 14 **Q.** It says:
 15 "There is a KEL for this problem ..."
 16 Did you know what KELs were?
 17 **A.** No.
 18 **Q.** Had you ever heard of something called a Known
 19 Error Log?
 20 **A.** No.
 21 **Q.** Anyway, it says:
 22 "There is a KEL for this problem [and the
 23 reference is given] LKiang351M.
 24 "The KEL explains that it is currently being
 25 investigated by development. I have not spoken
 61

1 Then RJ it showed all [negative] figures but the
 2 [negative] value reflects AA stock value but in
 3 [negative] format."
 4 Then an example is given.
 5 Then, at the foot of the page, four lines
 6 up:
 7 "More information has been received with
 8 regard to this problem. Is the KEL available as
 9 I am unable to locate it? Please can this be
 10 investigated further."
 11 Then over the page, five lines in:
 12 "See KEL [then that number is given] already
 13 specified.
 14 "[Postmaster] has not been contacted,
 15 closing as published known error."
 16 Then the call is closed.
 17 So you didn't know about the known error
 18 log?
 19 **A.** No. Never heard of it.
 20 **Q.** There's no record on here or indeed elsewhere of
 21 you or the subpostmaster being told that a known
 22 error in the system occurred, which was
 23 affecting the balancing process? Do you see,
 24 there's no record on this PinICL?
 25 **A.** No, no, no, I didn't know about it.
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1 to the customer."
 2 Had you been told that there was a system
 3 maintained by Fujitsu, who operated Horizon,
 4 that recorded known errors, known problems with
 5 the Horizon system?
 6 **A.** Had I been told?
 7 **Q.** Yeah.
 8 **A.** No, no.
 9 **Q.** There's a record here that one of those known
 10 problems, known errors, is seemingly afflicting
 11 the Cleveleys branch, ie there is a KEL for this
 12 problem.
 13 **A.** No, I didn't know that.
 14 **Q.** Then there's nothing relevant on the remainder
 15 of that page. Go over the page:
 16 "... contacted PM [this is three lines in]
 17 on 6 November.
 18 "Further [information] requested on the
 19 [Known Error Log] ...
 20 Adjusted ...
 21 "Everything was okay all stock showed
 22 correct value."
 23 Reading on:
 24 "Showed all AA figures [stock units] so
 25 subpostmaster had adjusted back to RJ value.
 62

1 **Q.** Instead, the Service Desk closed the call, don't
 2 contact the subpostmaster and they close it
 3 because it's a known error with Horizon; can you
 4 see that?
 5 **A.** I didn't know -- yeah, I can. I didn't even
 6 know there was such a thing.
 7 **Q.** Would this be important information that you
 8 would want to take into account or ensure that
 9 decision makers took into account when coming to
 10 decide, three weeks later, to suspend
 11 Mrs Wolstenholme and then terminate her
 12 contract?
 13 **A.** If there were known errors and this was the
 14 first time I'd heard about it, you'd have to
 15 take that into account. I'd never -- this is
 16 the very first time I've known about a known
 17 error. So, you know, you don't know how many
 18 times it would have been. You couldn't just say
 19 on that one statement that it would have altered
 20 any decision but, certainly, if it had been
 21 an ongoing thing, and there was a lot of
 22 published known errors and you would have known
 23 about it, you'd have had to take that into
 24 account.
 25 **Q.** That can come down from the screen. Thank you.
 64

1 Do you remember in your civil statement you
 2 said, "I'm giving the court the call records
 3 between January and November 2000"?
 4 **A.** No, I don't remember that.
 5 **Q.** Let me just outline where I'm going. In your
 6 statement you said, "I'm giving you the call
 7 records between January and November 2000,
 8 exhibited" --
 9 **A.** I'm giving the calls? Me?
 10 **Q.** Yeah, "in annex to my witness statement". Then
 11 we looked and we saw that they were, in fact,
 12 only between February and June 2000 and,
 13 therefore, they didn't --
 14 **A.** I gave them? When did I give them the ... why
 15 would I have --
 16 **Q.** Let's go back to your witness statement,
 17 POL00118219 -- it's going to come up on the
 18 screen -- and look at page 8, paragraph 12. In
 19 the fourth line you say "Copies of the call logs
 20 for the period between 10 January 2000 and
 21 30 November 2000", are essentially exhibited by
 22 you, yes, are at page 28 to 112 of your exhibit.
 23 Can you see that? It's on the screen,
 24 Mrs Cottam.
 25 **A.** Yeah, yeah.

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1 statement are true" and sign it with a pen
 2 underneath it, that indicates that you've
 3 written it. No?
 4 **A.** Well, when am I supposed to have signed this?
 5 **Q.** 16 October 2003.
 6 **A.** I don't remember it. I don't remember it and
 7 the very first time I knew there'd been a court
 8 case about this was when this has just been
 9 raised again, when they sent me this bundle of
 10 papers. I didn't even know there'd been a court
 11 case before that.
 12 **Q.** So you can't help us why the call log recording
 13 you on two occasions assisting Mrs Wolstenholme,
 14 complaining about the service offered by the
 15 Horizon Helpdesk, about a balancing issue and
 16 the system adding sums on rollover was not
 17 included in the documents exhibited to your
 18 witness statement? You can't help us there?
 19 **A.** No, no, I can't see it.
 20 **Q.** Three weeks before she was suspended?
 21 **A.** Am I supposed to be looking at this now? Is
 22 this on here?
 23 **Q.** I simply don't understand what you're asking
 24 now.
 25 **A.** Well, I don't understand what you're asking me.

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1 **Q.** So you're telling the court there, "I am
 2 exhibiting call logs between 10 January and
 3 30 November". We've seen that --
 4 **A.** I don't --
 5 **Q.** We've seen that the call logs that you in fact
 6 exhibited are between February and June. They
 7 therefore didn't include this November one.
 8 **A.** I don't know where -- I don't understand this
 9 because I wouldn't have been able to -- I didn't
 10 have any call logs.
 11 **Q.** I'll ask the question very generally. Why is it
 12 that your statement says you're exhibiting call
 13 logs between 10 January 2000 to 30 November 2000
 14 and, in fact, the call logs that are exhibited
 15 are between February and June 2000?
 16 **A.** I don't know. I don't remember this document at
 17 all. I just don't remember this at all.
 18 **Q.** Can you help us how it is that --
 19 **A.** I will help you as much as I can but, really,
 20 I don't understand where all this is coming
 21 from. Am I supposed to have written all this?
 22 I might well have signed it but I don't remember
 23 all this.
 24 **Q.** Generally, when you write something to a court
 25 and say, "I believe the contents of this

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1 **Q.** I'm asking --
 2 **A.** Are you saying that I've got copies of calls
 3 logs and that's what I based the suspension on?
 4 **Q.** No, I've not asked that question so far. I'm
 5 asking you whether you can explain why the call
 6 log that we just looked at, which records you
 7 joining in Mrs Wolstenholme complaining about
 8 Horizon and, on that occasion, 2 November,
 9 complaining about Horizon adding sums on
 10 rollover to a balance --
 11 **A.** I don't --
 12 **Q.** -- was not included in the information that you
 13 gave to the court?
 14 **A.** I didn't give any information to the court.
 15 I wasn't called at the court case.
 16 **Q.** Do you think somebody has fabricated your
 17 signature on this witness statement?
 18 **A.** Well, I don't know if that's the case or not but
 19 I didn't know anything about the court case and
 20 I wasn't called to the court case.
 21 **Q.** As I said, it didn't reach court because the
 22 Post Office settled.
 23 **A.** Oh. But I didn't know anything about it. You
 24 would have thought that they would have at least
 25 approached me about it. They must have wanted

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1 some input from me at that stage.
 2 **Q.** Yes, you -- this is a 15-page witness statement
 3 signed by you.
 4 **A.** No, this long -- this statement of truth, yeah?
 5 **Q.** Yes.
 6 **A.** August 2004. I just don't really understand
 7 what it is I'm supposed to be doing here,
 8 really. What -- I haven't got copies of the
 9 call logs, so -- other than in this bundle.
 10 I don't understand.
 11 **Q.** If you had called in about a problem with the
 12 Horizon system -- that can come down, thank
 13 you -- if you had called in about a problem with
 14 Horizon, about it adding sums on rollover on
 15 2 November 2000, you would want to take that
 16 into account, wouldn't you, when deciding
 17 whether to suspend Mrs Wolstenholme three or so
 18 weeks later?
 19 **A.** Well, she was only suspended -- it might have
 20 been that we suspended her while we looked at
 21 the whole thing. I really can't remember.
 22 **Q.** Well, that was my next question.
 23 **A.** I would've taken advice before suspending her.
 24 I wouldn't have done that often my own bat.
 25 I would have gone to the -- talked it through

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1 Manager about this letter.
 2 **Q.** It was your decision to suspend her, wasn't it?
 3 **A.** Yes, but I wanted to make sure that it was
 4 contractually correct, as I signed the letter,
 5 and that was the case with most of these
 6 letters.
 7 **Q.** I think we've agreed that it was you that
 8 suspended her, yes?
 9 **A.** Oh yeah, it would have had to be me.
 10 **Q.** What investigations did you carry out before
 11 suspending her?
 12 **A.** Well, it was an ongoing investigation, really.
 13 It was to do -- I'd been in the office quite
 14 a lot, we were looking at all the different
 15 things that were happening and there was lots of
 16 cash losses and gains. The Bureau de Change was
 17 overstated or understated. Lots of things were
 18 taken into account.
 19 **Q.** She was saying, in broad terms, it's the Horizon
 20 system that's the problem with this?
 21 **A.** Yeah, she was.
 22 **Q.** She was saying, "And I have raised these issues
 23 with the Helpdesk persistently over the last
 24 nine months", wasn't she?
 25 **A.** Yes.

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1 with the Contracts Manager.
 2 **Q.** When you said she was "only suspended", what did
 3 you mean by that?
 4 **A.** Well, suspended while we investigated.
 5 **Q.** When you investigated and she was saying, "I've
 6 not taken money, I've not mismanaged money, I've
 7 been complaining for the past nine months
 8 regularly to the Horizon Helpdesk about this
 9 system", would you have got the call logs then,
 10 to see whether what she was saying was true?
 11 **A.** I don't know.
 12 **Q.** Would you think that's a sensible thing to have
 13 done?
 14 **A.** It might have been. It depended what other
 15 information I'd got at the time.
 16 **Q.** Can we look, please, at POL00118219, at
 17 page 179, please. If we just go back a page,
 18 that's the signature part. This is your letter
 19 to Mrs Wolstenholme of 5 December 2000.
 20 **A.** Mm-hm.
 21 **Q.** You told her that you wrote on 30 November
 22 confirming her suspension and that was your
 23 decision to suspend, wasn't it?
 24 **A.** Not only mine and I wouldn't have drafted this
 25 letter. I would have gone to the Contracts

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1 **Q.** So did you check the call logs to see whether
 2 what she was saying was true and what had been
 3 done about her complaints?
 4 **A.** No, I didn't even really know about -- call logs
 5 existed at that time.
 6 **Q.** But three or four weeks before you suspended her
 7 on 30 November, you yourself had been
 8 complaining to the Helpdesk about Horizon adding
 9 a sum on rolling over. So you knew --
 10 **A.** Well --
 11 **Q.** -- that what she was saying was true, didn't
 12 you?
 13 **A.** Well, I didn't know it was true. How would
 14 I have known it was true? I just said that
 15 that's what had happened. I didn't see it
 16 happen.
 17 **Q.** So what investigation did you carry out to see
 18 whether it was true?
 19 **A.** I can't -- I couldn't have investigated that.
 20 That was, like, a technical issue.
 21 **Q.** In any event, as we can see here, you say you
 22 wrote on 30 November confirming suspension.
 23 **A.** Mm-hm.
 24 **Q.** "I have now reviewed papers", you're reviewing
 25 them:

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1 "I am ... considering the termination of
2 your contract ..."
3 **A.** Yeah.
4 **Q.** In the fourth line of the next paragraph, you
5 say:
6 "The excessive number of error notices ...
7 is unacceptable ..."
8 **A.** Yeah.
9 **Q.** During final audit, there were four error
10 notices.
11 **A.** Yeah.
12 **Q.** Next paragraph:
13 "Your failure to account for official cash
14 and stock properly, ie your refusal to operate
15 the Horizon system ... is you clear breach of
16 ... your contract."
17 **A.** Yeah, and it was -- that letter was drafted for
18 me -- well, the basis of it was drafted for me
19 by the Contracts Manager because I wouldn't have
20 known which -- what to say, the "section, para
21 this, this, and the other".
22 **Q.** So when Mrs Wolstenholme was saying, "The reason
23 why I am now refusing to use the Horizon system
24 is because it is riddled with faults which are
25 causing the very problems that you are accusing

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1 **A.** It was all blamed on the Horizon system but the
2 error notices that were coming back were error
3 notices where pension dockets were overstated.
4 The Foreign Exchange wasn't done correctly.
5 That was nothing to do with Horizon. That was
6 false accounting.
7 **Q.** She was false accounting, was she?
8 **A.** Well, I don't know who was false accounting but
9 it's what it was.
10 **Q.** So her raising the Horizon system in her defence
11 was an irrelevant consideration to you?
12 **A.** No, it wasn't irrelevant. But it was not the
13 only thing.
14 **Q.** What was the reason for the termination of her
15 contract?
16 **A.** I can't remember: failure to account for
17 official cash and stock properly and the refusal
18 to operate the Horizon system, and it was
19 a clear breach of section 12, para 4 of the
20 contract.
21 **Q.** That relies on what Horizon was telling you,
22 doesn't it?
23 **A.** Not the failure to account for official cash and
24 stock.
25 **Q.** How was the official cash and stock position

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1 me of", what did you do to investigate at this
2 stage, post-suspension?
3 **A.** Well, we'd been to the -- we were backwards and
4 forwards to the helpline with it but we didn't
5 then, and it -- that was not the only reason she
6 was suspended.
7 **Q.** I'm talking about post-suspension now; I'm
8 talking about termination now.
9 **A.** Yeah.
10 **Q.** What investigation did you carry out to judge
11 the accuracy or reliability of the things that
12 Mrs Wolstenholme was saying in her defence?
13 **A.** Well, it wasn't the Horizon system. That wasn't
14 the only reason that she was suspended. It was
15 about the error notices that weren't being
16 brought to account. There was a lot of that.
17 Despite letters, and I remember hand delivering
18 these letters saying, "You need to bring these
19 to account", and that was not done.
20 **Q.** Would the calls made by a subpostmaster to the
21 NBSC, the two forms of Helpdesk, be taken into
22 account in making a decision on termination?
23 **A.** Yes, yes, they would. But it wasn't all down to
24 the Horizon system.
25 **Q.** What do you mean --

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1 recorded?
2 **A.** The auditors would have gone in and done that,
3 the final audit, and they've said -- they've
4 said on here --
5 **Q.** Did auditors go in?
6 **A.** Yeah, of course they did. Final audit.
7 I didn't do the audits. The auditors went in.
8 **Q.** Do the auditors rely on what the cash and stock
9 position is shown by Horizon in order to reach
10 their conclusions?
11 **A.** They -- I can't say what the auditors did. They
12 would have -- they would have looked at
13 everything. They did a final audit and they
14 would go back and see about error notices that
15 were issued and making sure pensions were
16 brought to account correctly and not overstated,
17 all that. But that was to do with the auditors.
18 **Q.** Can we move forward, please, and look at
19 POL00118242.
20 Look at second page, please, and scroll
21 down, please. You're not included on this email
22 chain. It's from Jim Cruise, a Post Office
23 lawyer, to Mandy Talbot, another Post Office
24 lawyer, and it's about the Clevellys post office
25 and Mrs Wolstenholme. To give you some context,

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1 Mr Cruise's email says:
 2 "This case started back on 17/1/01 with
 3 an email query from the then Personnel
 4 Department ... about the above office when the
 5 [subpostmaster's] contract was suspended on
 6 30 November 2000 as there were a large number of
 7 error notices and losses and gains. At that
 8 time the losses were £14,000 and the
 9 [subpostmaster] was refusing to make them good
 10 blaming the losses on the Horizon system which
 11 had been introduced on February 2000 at her
 12 office."

13 That all seems accurate so far:

14 "She was given 3 months notice and her
 15 remuneration for the 3 months came to about
 16 £19,300 which was set against losses. An
 17 attempt was made to install a temporary
 18 [subpostmaster] at the premises but negotiations
 19 eventually broke down but [Mrs Wolstenholme] had
 20 by then made a claim for rent for [Post Office]
 21 equipment remaining at the premises after
 22 30 November. The claim was not accepted as it
 23 was felt to be in both side's interests for the
 24 equipment to stay while there was a chance of
 25 a temporary SPM being installed.

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1 this Post Office lawyer to obtain a full audit
 2 trail for this post office and you replied that
 3 you had got the call logs for the office?
 4 **A.** That letter, I wouldn't have written that
 5 letter. It was -- if it's come from Jim Cruise
 6 to Mandy Talbot that would have been drafted for
 7 me. Now, I wouldn't have had --
 8 **Q.** Just to be clear --
 9 **A.** I don't know why --
 10 **Q.** Just to be clear, sorry to speak over you, this
 11 isn't a letter written by you or suggested to be
 12 written by you; this is an email between two
 13 people referring to something that one of them
 14 says he did with you, namely asking you to get
 15 a full audit trail, and you replying, saying you
 16 had got the call logs for the office, yes?
 17 **A.** He said that, did he?
 18 **Q.** Yes. You can see it on the screen.
 19 **A.** Who said I had them? Roger Harrison said I had
 20 the call logs, did he?
 21 **Q.** No. Mr Cruise said to Ms Talbot that you had
 22 got the call logs.
 23 **A.** Well, I don't remember that. If I had the call
 24 logs, they would have been in the Clevellys file
 25 that was delivered to Leeds area office by

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1 "On 7 February 2001 the [subpostmaster's]
 2 partner, Roger Harrison, asked if ICL [that's
 3 Fujitsu] could look at the computer system as he
 4 believed that there were problems with it. On
 5 23/2/01, RH [I think that's Roger Harrison]
 6 refused to allow the safes and Horizon equipment
 7 to be removed from the [Post Office] which [Post
 8 Office Limited] wished to do as the claim for
 9 rent had been made. The refusal was because of
 10 the dispute with [Post Office].
 11 [Mrs Wolstenholme] asked for proof that the
 12 losses were her fault and caused [I think that
 13 should be 'and not caused'] by computer failure.
 14 She also asked for copies of all error notices
 15 but Chesterfield said that these were not
 16 available."

17 Then this:

18 "On 27 February 2001 I advised Elaine Tagg
 19 ... that because of the allegation of computer
 20 failure the printouts should be obtained from
 21 the National Audit Team showing a full audit
 22 trail at this Post Office. On 28/2/01 Elaine
 23 Tagg told me that she had the call logs for the
 24 office."

25 Is that correct, that you were tasked by

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1 myself. Because everything that I had following
 2 this case, I personally took to Leeds in the
 3 file.
 4 **Q.** Would the audit trail or the call logs for this
 5 branch only have been obtained after suspension
 6 and after termination?
 7 **A.** I don't know. I can't remember that.
 8 **Q.** In the absence of audit data or call logs, what
 9 was the evidential basis for the suspension and
 10 then termination of Mrs Wolstenholme's contract?
 11 **A.** I'm looking for the official wording for this
 12 because I don't want to get this wrong. I think
 13 it was -- I can't -- I don't know where it is
 14 but somewhere it was about refusal -- within it,
 15 was about refusal to bring -- and I can't quote
 16 this and say absolutely, but it was refusal to
 17 bring error notices to account, false accounting
 18 and -- oh, what's the other thing? Refusal to
 19 use the Horizon system, did I say that? There
 20 were several things.
 21 **Q.** What I'm essentially asking is, by the time that
 22 those several things were decided upon, had you
 23 obtained a full audit trail for the post office
 24 concerned?
 25 **A.** I wouldn't have done that. The Audit Team would

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1 have gone in and they would have done all that,
 2 the full audit trail.
 3 **Q.** What did auditors do? Did they just check stock
 4 and balance on the day that they went in and --
 5 **A.** They did everything. They checked everything.
 6 **Q.** What does everything mean?
 7 **A.** Well, everything that they would need to do.
 8 I don't know what an Audit Team did when it went
 9 in. I know it checked cash and stock, it used
 10 to go back through to -- in some cases, they
 11 would recall pension documents to make sure that
 12 they were listed correctly, they weren't
 13 overstated or understated. What else would they
 14 go to? They would look at all remittances in,
 15 remittances out. So that's what the full audit
 16 trail would do.
 17 **Q.** What product did you get from the Audit Team
 18 when you were deciding whether to suspend or to
 19 terminate?
 20 **A.** I can't remember.
 21 **Q.** Was it done by way of conversation?
 22 **A.** It was -- um, I can't remember. The Audit Team
 23 might have a record of it. It would have been
 24 done over the telephone originally and I would
 25 have gone to the Contracts Manager and said

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1 implement the checking procedures we discussed
 2 during my recent visits ie the manual recording
 3 of data you feel has been miscalculated by your
 4 Horizon system and the recording of all error
 5 notices received (using the pro forma I left
 6 with you ...). Can I also take this opportunity
 7 to advise you that accurate accounting within
 8 the office is your responsibility and whilst
 9 I can advise you on best practice the
 10 introduction of such practices lies with you."
 11 So it seems like you did tell her manually
 12 to record data that she felt had been
 13 miscalculated by the Horizon system, doesn't it?
 14 **A.** It would appear so but I think that was an -- if
 15 I -- I don't remember it, but if it -- that
 16 would have been a good -- a good way of sort of
 17 double checking what was going wrong and what --
 18 what she thought was going wrong and what
 19 wasn't. But I -- manual recording of data.
 20 Yeah, so where she felt it had been
 21 miscalculated by Horizon system, she should have
 22 been recording it and recording all error
 23 notices received because I left her a pro forma
 24 for that because they weren't bringing error
 25 notices to account.

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1 they'd had the audit or whatever.
 2 **Q.** Do you remember being concerned about what
 3 Mrs Wolstenholme was telling you at the branch,
 4 to an extent that you suggested that she
 5 maintained a mirror system, a manual record, of
 6 transactions that she believed was being
 7 miscalculated by the Horizon system?
 8 **A.** No, I don't remember that.
 9 **Q.** She -- Mrs Wolstenholme, that is -- has given
 10 evidence to the Inquiry that you told her that
 11 you need to maintain, essentially, a side record
 12 in writing, handwritten record, of transactions,
 13 in particular the transactions that you feel
 14 have been miscalculated by the Horizon system.
 15 Do you remember that?
 16 **A.** I do not.
 17 **Q.** Can we look, please, at POL00118219, at
 18 page 165. This is a letter to her dated
 19 3 November 2000 and if we look at the second
 20 page over the page, we can see it's your letter,
 21 yes? Go back to the first page, please. So
 22 this is two days after you've been phoning the
 23 Helpdesk. If we go to the foot of the page,
 24 please, in the last paragraph, you said:
 25 "I must strongly advise you to immediately

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1 **Q.** Was it usual to tell postmasters to maintain
 2 a manual side record?
 3 **A.** In this case, it certainly was.
 4 **Q.** So it was usual or was not usual?
 5 **A.** It wasn't usual but it was a double check to
 6 make sure everything was going correctly, that
 7 was being recorded correctly.
 8 **Q.** Did you obtain a copy of such a manual record
 9 from her?
 10 **A.** I can't remember. I haven't got anything in the
 11 files, so I can't remember.
 12 **Q.** There's certainly nothing exhibited to your
 13 October 2003 witness statement concerning it.
 14 Can we go back to your witness statement,
 15 please, at the same volume, page 8. In
 16 paragraph 12, you told the court that
 17 Mrs Wolstenholme persisted in calling the
 18 Helpdesk but these problems related to the use
 19 and general operation of the system and were not
 20 technical problems relating to the system.
 21 How were you able to say that the problems
 22 of which she was complaining were not technical
 23 problems relating to the system?
 24 **A.** I would have asked the helpline what sort of
 25 problems were they.

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1 Q. How would you have asked? Who would you have
2 asked?
3 A. I would have asked one of the managers.
4 Q. This is you telling the court that it shouldn't
5 be concerned with any problems with Horizon,
6 isn't it?
7 A. Is it? Where's the interpretation of that?
8 Q. I'm sorry?
9 A. I don't understand what you're saying. Are you
10 saying that I'm telling them that --
11 Q. "Court, don't worry about Horizon in
12 Mrs Wolstenholme's case. All of her calls are
13 about her use and operation of the system.
14 They're not technical problems concerned with
15 the system itself."
16 A. Oh, yeah so --
17 Q. I'm asking you what evidence you had for that?
18 A. Because of the number of error notices that were
19 coming back.
20 Q. How does the number of error notices demonstrate
21 that the dozens and dozens and dozens of calls
22 that she made to the Horizon Helpdesk did not
23 concern technical problems?
24 A. Because they were like overstating of pensions
25 or understating of pensions or dockets were

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1 Q. -- the latter of which was about the system
2 adding a figure on rollover. Why did you tell
3 the court that Mrs Wolstenholme's calls were not
4 technical problems relating to the system?
5 A. I don't know. I don't even remember that.
6 Q. In the last paragraph --
7 A. I'm sorry. I can only surmise because of the
8 number of error notices we were getting.
9 Q. Okay. Last sentence in that paragraph, you move
10 to problems at other branches --
11 A. Yeah.
12 Q. -- and you say:
13 "Whilst there were some problems at other
14 branches, they were not insurmountable and were
15 often due to the system crashing or general
16 teething problems."
17 A. Yeah.
18 Q. Where did you get the information from to make
19 that statement in your witness statement?
20 A. Because I was visiting other offices to see how
21 they were going on and I was assessing it
22 against that.
23 Q. So that last sentence is based on your
24 experience of the other 111 branches?
25 A. I didn't -- at that time, I didn't have 111

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1 missing or -- they were -- it --
2 Q. She wasn't calling Helpdesk about those, was
3 she?
4 A. No.
5 Q. She was calling the Helpdesk about problems with
6 Horizon. We've seen three calls today already,
7 where you joined in on the call, complaining
8 about problems with Horizon?
9 A. Well, I took her word for it at the time.
10 Q. So why did you tell the court that the problems
11 of which she was complaining were not technical
12 problems relating to the system?
13 A. Where is this? Which court? I've not been to
14 court?
15 Q. It's on the screen.
16 A. I haven't been to court.
17 Q. Tell the court in a witness statement, this
18 witness statement that we're staring at.
19 A. I'm sorry, you'll have to explain to me what
20 I'm -- what -- I'm lost now. You'll have to
21 explain to me what I'm supposed to be seeing.
22 Q. We've seen three call logs this morning where
23 you yourself joined in the calls to the Helpdesk
24 concerning problems with the Horizon system --
25 A. Yeah.

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1 branches. I think I only had 27.
2 MR BEER: I'm not going to go back over that old
3 ground. I'm very grateful to you for the help
4 you've given us. They're all the questions I
5 ask.
6 Sir, I don't think there are any questions
7 from anyone else?
8 SIR WYN WILLIAMS: Is that correct?
9 MR BEER: It is.
10 SIR WYN WILLIAMS: Very well, then, that's the end
11 of your session, Mrs Cottam. Thank you for
12 coming to give evidence to the Inquiry, I'm
13 grateful to you.
14 THE WITNESS: Thank you.
15 MR BEER: Sir, we now turn to the disclosure issue.
16 I don't know whether it will be convenient to
17 you to take a short break now.
18 SIR WYN WILLIAMS: Yes, by all means. What do you
19 suggest, Mr Beer?
20 MR BEER: Just 15 minutes so we can all reorientate
21 ourselves in time and place --
22 SIR WYN WILLIAMS: Fine.
23 MR BEER: -- and deal with disclosure.
24 SIR WYN WILLIAMS: So that means we return at 12.40,
25 is that it?

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1 **MR BEER:** Yes. Thank you, sir.

2 **SIR WYN WILLIAMS:** Okay, fine.

3 (12.25 pm)

4 (A short break)

5 (12.42 pm)

6 **Submissions re disclosure**

7 **MR BEER:** Sir, good morning. Can you continue to
8 see and hear me? Sorry, good afternoon!

9 **SIR WYN WILLIAMS:** Yes, thank you. Did you catch
10 that, Mr Beer? I can see and hear you.

11 **MR BEER:** Yes, thank you. I was just waiting for
12 people to take their seats in the room.

13 **Statement by MR BEER**

14 **MR BEER:** After Mrs Cottam, we were scheduled to
15 hear from Mr Stephen Bradshaw this afternoon,
16 Teresa Williamson and Mr David Posnett tomorrow,
17 and Natasha Bernard on Friday.

18 There's a significant and urgent matter that
19 I need to raise before we proceed to consider
20 the evidence of any of those witnesses. The
21 Core Participants are aware of the issue because
22 they were informed by the Inquiry by email
23 yesterday afternoon of the issue and received
24 the correspondence that I am about to refer to
25 yesterday afternoon, and correspondence that was

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1 Mr Jackson stated that the consequence of
2 that work was:

3 "Data sources have been and continue to be
4 identified and the potential relevance of which
5 will need to be assessed.

6 "The Post Office believes that its
7 understanding is now significantly advanced.
8 However, because of some factors set out in
9 an earlier letter to the Inquiry and also
10 difficulties with the availability of corporate
11 memory within technical IT functions, the
12 development of the Post Office's understanding
13 and the potential relevance of further
14 repositories, other data sources and material
15 not yet either fully harvested or fully reviewed
16 continues."

17 Mr Jackson noted in particular that he
18 wanted to expand upon the Microsoft Exchange
19 issue. As we understand it from that letter,
20 the issue is as follows, and I'm quoting in
21 large part directly from the letter.

22 Firstly, Post Office from the point
23 approximately of de-merger from Royal Mail Group
24 in 2012 operated an email gateway platform
25 called Proofpoint, which was similar to another

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1 received overnight, they received this morning.

2 They are all aware that the Inquiry has, in
3 the time permitted, been considering it on
4 an urgent basis.

5 On Thursday afternoon of last week, the
6 Inquiry received a five-page letter from the
7 Post Office's recognised legal representative,
8 Mr Chris Jackson of Burges Salmon LLP. The
9 letter was entitled "Post Office Horizon IT,
10 Post Office disclosure, structural update as
11 incoming RLR", ie recognised legal
12 representative.

13 It discussed a number of matters and in
14 particular the letter addressed an issue that
15 I'm going to refer to the Microsoft Exchange/365
16 issue, a copy of the letter you have, sir, and
17 has been provided to all Core Participants, so
18 I'm not going to read it all to you now.

19 In summary, it stated that the Post Office
20 had been undertaking what was described as
21 "a structural review" and "related ongoing work"
22 which had been referred to by Mrs Diane Wills,
23 the Post Office's Inquiry Director, in her
24 witness statement, given for the purposes of the
25 disclosure hearing back on 5 September 2003.

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1 platform called Mimecast. Proofpoint:

2 "... amongst other things, created
3 an archive of all emails sent from or to
4 postoffice.co.uk email addresses, sometimes
5 known as journalling."

6 The platform was:

7 "... intended and presumably believed to
8 capture all emails sent and received along with
9 attachments during its period of operation."

10 He continued:

11 "The technology behind the interaction of
12 these email systems is complex and is still
13 being investigated. However, Post Office's
14 current understanding is that Microsoft Exchange
15 and, before that, Lotus Notes, is the enterprise
16 mail server that serves individual mail boxes as
17 accessed by users through email applications,
18 such as Microsoft Outlook."

19 Mimecast and, before that, Proofpoint,
20 operates as an additional gateway between
21 Microsoft Exchange and the onward and inward
22 transmission of emails and, in doing so,
23 performs various functions, including the
24 journalling of all inbound and outbound emails.

25 As a result, the Post Office explain that:

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1 "Conceptually, platforms, such as Mimecast,
2 should contain the fullest possible record of
3 inbound and outbound emails, particularly given
4 that they have much longer retention periods
5 than Microsoft Exchange."
6 In around 2016, Microsoft was -- sorry,
7 Mimecast was introduced and the Post Office
8 understands that Proofpoint was migrated into
9 Mimecast. On that logic, he continues:
10 "There should have been continuity of email
11 data in Mimecast from 2012 onwards."
12 The Post Office understands, he said:
13 "... that Mimecast was used as the source
14 for email harvesting for the Inquiry and also
15 for the Group Litigation."
16 The Post Office understands that 300 plus
17 email accounts have been harvested from Mimecast
18 into the various parts of the Post Office
19 Relativity database for the various phases of
20 the Inquiry.
21 However -- and it's a significant
22 "however" -- first, queries by Herbert Smith
23 Freehills relating to the account of Andrew
24 Wise, which relates, we understand, to our
25 initial inquiries about Appendix 6, which you'll
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1 Microsoft Exchange.
2 However, as an indication of the scale, KPMG
3 carried out an analysis at the instruction of
4 Burges Salmon and Fieldfisher and the Post
5 Office against:
6 "... 13 of the 19 individuals named in
7 a Section 21 notice from the Inquiry sent in
8 July."
9 This is relevant to upcoming phases of the
10 Inquiry, sir, Phases 5 and 6 for next year and
11 the Post Office gave us information in this
12 letter that the remaining six of the 19
13 individuals were said not to have had Microsoft
14 Exchange accounts.
15 So using that forward-looking scoping,
16 Mr Jackson said:
17 "The latest analysis indicates that there
18 are approximately 363,000 parent emails that are
19 not held in Mimecast."
20 That's after deduplication following
21 a standard forensic deduplication approach. It
22 does not indicate the number of documents that
23 are potentially responsive to that Section 21
24 notice or which require review.
25 He says:

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1 remember from the spring, and, secondly, in
2 parallel with queries from Burges Salmon and
3 Fieldfisher, the new RLR, in relation to
4 a Section 21 notice concerning Phases 5 and 6,
5 have led to investigations by Post Office by and
6 with KPMG.
7 Those investigations, he says:
8 "... have now established that there are
9 material volumes of email data that are in
10 Microsoft Exchange but that are not in
11 Mimecast."
12 Therefore, they are said to have been not
13 available for search by the Post Office.
14 Furthermore, he says:
15 "The Post Office has not been able to
16 establish why the Proofpoint to Mimecast
17 transfer did not provide the assumed continuity
18 and/or completeness."
19 Sir, the letter then explains that the total
20 scale of the issue is not known by the Post
21 Office because the email boxes harvested for all
22 phases to date have been taken from Mimecast,
23 and that the Post Office is currently
24 investigating the number of custodians in
25 respect of whom any emails are available on
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1 "In the light of these findings, the
2 relevant 13 email accounts are being reviewed by
3 the Post Office."
4 The Post Office is due to provide its
5 response to our Section 21 notice by 8 November
6 this year.
7 That notice, as I've said, was sent in July
8 this year and the deadline has been extended
9 twice.
10 Sir, members of your Inquiry Team met with
11 members of the Post Office and their legal teams
12 on Friday, 3 November, Friday last week, the day
13 after this update was received, and the
14 Microsoft Exchange/365 issue was discussed.
15 Myself and another member of the counsel
16 team stressed that the Inquiry needed more
17 information on an urgent basis to know if there
18 were further documents from the Microsoft
19 Exchange/365 platform that related to this
20 week's witnesses. So never mind looking at 13
21 of the 19 individuals that are relevant to
22 a Section 21 notice that concerns Phase 5 and 6,
23 what about documents that may be relevant to the
24 witnesses we were about to call in this phase,
25 Phase 4?

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1 The solicitor to your Inquiry asked that the
2 Post Office informed the Inquiry by 5.00 pm on
3 Friday the extent to which the Microsoft 365
4 issue may affect or afflict this week's
5 witnesses.

6 At 5.19 on Friday, the Post Office, via
7 Herbert Smith Freehills, wrote to the Inquiry,
8 and noted:

9 "We have run address book searches on
10 Microsoft Exchange/365 for all of the witnesses
11 giving evidence in the week commencing
12 7 November. These searches will run for the
13 individual's email addresses and any aliases
14 within the address book on Exchange/365. No
15 Exchange data has been located for the witnesses
16 scheduled to give evidence next week other than
17 Stephen Bradshaw and Dave Posnett.

18 "Peters & Peters have completed their review
19 of the material identified using these searches
20 for Messrs Bradshaw and Posnett and they are
21 working with KPMG to produce these documents
22 today if possible or as soon as possible
23 thereafter. We understand from Peters & Peters
24 that production is currently expected to
25 comprise of approximately 500 documents.

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1 Sir, those documents that were received,
2 were received late. They are said to respond to
3 Rule 9 notices made by the Inquiry on 3 December
4 2021, 15 June 2022 and 17 August 2022, with
5 a small number of documents said to be otherwise
6 of interest.

7 It goes without saying that those documents
8 were extremely late, in some cases responsive to
9 requests for disclosure made by the Inquiry
10 nearly two years ago.

11 It also appears that some of them may be
12 materially similar, however, to other documents
13 already disclosed by the Post Office.

14 Sir, members of your legal team worked over
15 the weekend to review those 421 documents ahead
16 of this week's witnesses. That's part of
17 a pattern of work to try to ensure that these
18 Phase 4 hearings can go ahead as planned and, in
19 Mr Blake's case, who had the lion's share of the
20 421 to read, tireless work.

21 The position yesterday afternoon was that
22 the Inquiry was proposing to proceed with all of
23 the witnesses listed to be heard this week.
24 Mr Blake and I had got on top of this new
25 material, the 421 documents.

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1 "The Post Office is urgently running further
2 searches for the witnesses for whom no material
3 could be found via an alternative mechanism,
4 namely party-based searches, ie searches based
5 on who was a party to an email. Out of
6 an abundance of caution, this secondary
7 mechanism will also be run in relation to
8 Mr Bradshaw and Mr Posnett. No data was found
9 using this search for Mrs Cottam.

10 "The Post Office is still testing whether
11 other search mechanisms might yield further
12 documents, eg proximity searches based on the
13 name which appears in a person's email address.

14 "This work is being conducted urgently. We
15 will provide a further update and any documents
16 that have been identified on Monday,
17 6 November."

18 At 8.24 pm on Friday, the Inquiry received
19 421 documents from the Post Office and at
20 9.01 pm the Post Office provided a cover letter
21 to the production of those 421 documents
22 explaining that these documents were identified
23 as a result of address book searches on
24 Exchange/365 relating to Stephen Bradshaw and
25 Mr David Posnett.

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1 At 8.29 pm last night, the Post Office sent
2 a further letter to the Inquiry. Given its
3 significance, I'm going to read the relevant
4 parts of it into the record.

5 If you've got it, sir, it's letter 8.29 pm
6 last night, from paragraph 2 onwards:

7 "In our email of 3 November 2023, we
8 provided an update on the production of
9 documents from Exchange/365 in relation to the
10 witnesses who were giving evidence in the week
11 commencing 7 November. We explained that the
12 Post Office had conducted address book searches,
13 ie searches run for individual email addresses
14 and any aliases within the address book on
15 Exchange/365, and was urgently running
16 additional party-based searches, ie searches
17 based on who was a party to an email, in
18 relation to this week's witnesses. We're
19 writing to provide a further update in relation
20 to the witnesses giving evidence this week.

21 "The Post Office does not currently
22 anticipate producing any additional documents
23 from Exchange/365 in relation to Elaine Cottam,
24 Teresa Williamson or Natasha Bernard. However,
25 for the reasons outlined below the Post Office

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1 is unable to provide the same reassurance in
 2 respect of Stephen Bradshaw and Dave Posnett."

3 The letter then addresses the position of
 4 Elaine Cottam in its paragraph 4. As we've
 5 heard from Mrs Cottam, I'm not going to read it.

6 Moving on to paragraph 5 under the heading,
 7 "Stephen Bradshaw, Tuesday, 7 November 2023":

8 "On Friday, 3 November 2023, the Post Office
 9 produced 382 documents."

10 Just stopping there for your note, that's
 11 the part of the 421:

12 "Documents tagged as relating to Mr Bradshaw
 13 as a result of the review of the material
 14 identified following address book searches for
 15 Mr Bradshaw.

16 "Over the weekend, the Post Office conducted
 17 further party-based searches to seek reassurance
 18 that no additional material was captured by
 19 these searches. Unfortunately, the party-based
 20 searches have returned a very significant volume
 21 of material apparently relating to Mr Bradshaw.
 22 It has not been possible to process the data so
 23 it has not yet been possible to ascertain the
 24 level of internal duplication, the extent to
 25 which the material might overlap with documents

1 prioritising this as a matter of urgency.

2 "Teresa Williamson.

3 "The Post Office has not identified any
 4 Exchange/365 material relating to Teresa
 5 Williamson as a result of the address book or
 6 party-based searches.

7 "David Posnett.

8 "On Friday, 3 November, the Post Office
 9 produced five documents relating to David
 10 Posnett following the address book searches.
 11 The party-based searches run over the weekend
 12 have resulted in the identification, harvesting
 13 and processing of 22,000 parent emails after
 14 deduplication at MD5# level. It's likely that
 15 some of this material will be new and POL is
 16 working to identify the extent of any new
 17 material it will be necessary to review.

18 "Regretfully, the Post Office anticipates it
 19 will not be possible to review and produce any
 20 new material resulting from the party-based
 21 searches sufficiently in advance of Mr Posnett
 22 giving evidence on 9 November. As with the data
 23 for Mr Bradshaw, the Post Office is prioritising
 24 this as a matter of urgency.

25 "Natasha Bernard.

1 already harvested by address book searches and
 2 data otherwise available in POL's Relativity
 3 databases.

4 "However, it is anticipated that there may
 5 be new material within that data. Work is being
 6 urgently undertaken to conduct further analysis
 7 of that data, in order that the position can be
 8 established.

9 "Further, given it has not been possible to
 10 process the data, the Post Office has not been
 11 able to run search terms or conduct analysis to
 12 identify the volume of new material.

13 "Regretfully, there is no prospect of the
 14 Post Office being in a position to review or
 15 produce any relevant material as a result of
 16 party-based searches before Mr Bradshaw is
 17 scheduled to give evidence tomorrow. Further,
 18 the Post Office is not in a position to provide
 19 any reassurance to the Inquiry that no
 20 additional relevant material exists.

21 "As soon as the Post Office can provide the
 22 likely volume of additional material that needs
 23 to be reviewed, it will provide the Inquiry with
 24 a time frame within which the material can be
 25 reviewed and produced. The Post Office is

1 "The Post Office did not identify any
 2 material following the address book searches in
 3 respect of Ms Bernard. Party-based searches run
 4 over the weekend resulted in the identification
 5 of approximately 640 parent emails. Search
 6 terms applied to this material resulted in no
 7 relevant material being identified. A manual
 8 search is being completed overnight however the
 9 Post Office does not expect the position to
 10 change in relation to Ms Bernard.

11 "Lastly, we will update the Inquiry further,
 12 including in relation to the witnesses giving
 13 evidence next week, as soon as possible."

14 Lastly, at 11.14 pm last night -- the letter
 15 I've just read was from Herbert Smith Freehills,
 16 the letter I'm about to quote from was from
 17 Burges Salmon and Fieldfisher. They wrote to us
 18 at 11.14 pm last night, albeit the letter is
 19 dated 7 November, today.

20 They write further to the Herbert Smith
 21 Freehills letter and advance of the hearing
 22 today:

23 "The Inquiry's most pressing concern will of
 24 course be Phase 4 hearings currently under way."

25 Under the heading "Microsoft Exchange", they

1 say:

2 "The current knowledge in respect of the
3 data held on the Post Office's Microsoft
4 Exchange servers is addressed in the Herbert
5 Smith Freehills letter [that I've just read].

6 "The Post Office apologises that it's only
7 been able recently to provide a greater level of
8 information about the impact of the data located
9 on the Microsoft Exchange repository. As
10 explained in our letter of 6 October and
11 20 October, whether or not the emails were new
12 required complex technical knowledge and work.
13 At the time of that correspondence and as is
14 still the case, the extent of duplication is
15 unclear. The Post Office and its external
16 advisers are working on a proposed approach to
17 address the issue in terms of impacts on
18 disclosure and will update the Inquiry by the
19 end of this week."

20 Then there is some information about still
21 further other data sources.

22 The information given to the Inquiry at
23 8.29 pm last night is plainly very significant
24 information. I'm going to invite you in
25 a moment to hear from Ms Gallafent on behalf on
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1 a significant witness who has a footprint
2 against a large part of the Inquiry's relevant
3 period and is involved in a number of important
4 events of significant interest to the Inquiry.

5 Thirdly, there are a number of emails
6 already in possession of the Inquiry where we
7 would dearly like to have seen the replies or
8 follow-on emails.

9 In relation to Mr Posnett, as I said, we
10 thought over the weekend we had addressed the
11 new material relating to Mr Posnett that came
12 from this data source, but it seems that there
13 is a pool of some 22,000 documents to be looked
14 at. That's after duplication and it is parent
15 emails. You'll note the significance of that,
16 that a parent email can, itself, be the source
17 to many, many more documents if those documents
18 are attached to an email. That number, 22,000,
19 is a very high number indeed.

20 Mr Posnett is a very significant witness,
21 scheduled to give evidence for a day and a half,
22 again involved in a series of significant events
23 of interest to the Inquiry.

24 Both of the witnesses I've just mentioned
25 Messrs Bradshaw and Posnett, are witnesses whom
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1 the Post Office and then from any other Core
2 Participants who wish to make submissions and
3 then, if I may, I'll reply. But, for now,
4 I would note the following:

5 On the basis of what the Post Office,
6 through its various lawyers, have said, there
7 appears to be no reason why the Inquiry cannot
8 proceed to call Teresa Williamson or Natasha
9 Bernard. In the light of the information that
10 I've just read, you will appreciate why we
11 proceeded with Mrs Cottam just now.

12 In relation to Stephen Bradshaw, the letter
13 of last night does not state how much material
14 has been returned by these recent searches
15 relating to Mr Bradshaw. It simply says there
16 is "a very significant volume".

17 We understand that the work undertaken by
18 the Post Office to date suggests there is a pool
19 of documents which is very large indeed,
20 ie a very high number of documents on which to
21 conduct a deduplication and then a relevance
22 exercise. I would invite Ms Gallafent to inform
23 you of the Post Office's current understanding
24 of how large the pool of material is.

25 Secondly, in relation to Mr Bradshaw, he is
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1 I would have invited you to give the
2 self-incrimination warning to on the basis of
3 material already within our possession.

4 This material was not, on the face of it,
5 disclosed in the course of the Group Litigation,
6 despite, as we understand it, Mimecast being the
7 source for the harvesting of emails in the Group
8 Litigation. The non-disclosure of this
9 material, if it turns out to be material
10 non-disclosure, may be a matter to which we will
11 have to return in Phases 5 and 6 of the Inquiry.

12 This material was not, on the face of it,
13 disclosed in the course of the appeals to the
14 Court of Appeal Criminal Division and the same
15 point may apply.

16 As for the Post Office, I would invite them,
17 in addition to the point I have made already, to
18 explain firstly in clear terms their present
19 understanding of what has gone wrong here.

20 Secondly, to give their assessment of the
21 likely relevance of this material to Messrs
22 Bradshaw and Posnett, not, of course, on the
23 basis that they have read it and analysed it,
24 they haven't got to that stage yet, but because
25 they possess it, they know the date ranges
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1 concerned, they know the probabilities of
2 whether we have or have not seen this material
3 before and they know the extent to which there
4 are gaps in our disclosure from 2012 onwards.

5 Thirdly, to give their judgement, by way of
6 submission to you, as to both the feasibility
7 and the appropriateness of calling Messrs
8 Bradshaw and Posnett without disclosure of this
9 material. You will have seen that the letter of
10 8.29 last night said that the Post Office -- and
11 I summarise -- can give the Inquiry no
12 reassurances whatsoever.

13 I would invite them to assist you with the
14 opposite issue, namely an assessment of the
15 likelihood of these caches of documents
16 containing material that is relevant to Messrs
17 Bradshaw and Posnett.

18 Sir, that's all say for now. I would invite
19 you to hear from Ms Gallafent first, then the
20 subpostmaster representatives, then any other
21 Core Participant who wishes to make submissions.

22 **SIR WYN WILLIAMS:** All right. Well, Ms Gallafent,
23 it does seem to me appropriate for me to invite
24 you to respond to what Mr Beer has just said.

25 **Statement by MS GALLAFENT**
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1 different in respect of Ms Cottam, who of course
2 has already given evidence this morning,
3 Ms Williamson and Ms Bernard. We agree with the
4 analysis that there is no reason why their
5 evidence should not continue to be heard in
6 accordance with the schedule this week and, for
7 the avoidance of any doubt, the additional
8 checks that were indicated would be carried out
9 overnight last night have been carried out and
10 there are no documents to be produced from
11 Exchange/365 in relation to either Ms Williamson
12 or Ms Bernard.

13 I am not in a position, sir, to explain to
14 you what has gone wrong. I can assure the
15 Inquiry that many people have been seeking to
16 ascertain why this apparently anomalous
17 distinction between what is held on Exchange/365
18 and what is held on Mimecast has arisen. I am
19 told that it is a deeply technical and
20 complicated question for which there has yet not
21 been identified a simple answer.

22 That is why, for the time being at least,
23 while, obviously, enquiries continue into trying
24 to work out what went wrong, we have focused in
25 the short-term on trying to work out what we can

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1 **MS GALLAFENT:** Thank you, sir, yes I intend to.

2 Sir, I'm not going to go back over the
3 correspondence which Mr Beer has very helpfully
4 outlined and summarised for you, save to note
5 one point, which is, as in a letter from Herbert
6 Smith Freehills of 20 October of this year, it
7 was a general catch-up letter in relation to
8 a number of disclosure issues, at that time,
9 initial sampling had indicated that there was
10 significant overlap between data held on the
11 Mimecast archive and that held on Microsoft
12 Exchange or sometimes it's referred to as
13 Exchange/365.

14 It wasn't until very recently that the
15 differences and the potential for an absence of
16 overlap was identified.

17 Post Office fully recognises the importance
18 of the Inquiry, of witnesses and other Core
19 Participants having proper notice of new
20 documents prior to a witness giving evidence.
21 It deeply regrets that the finds itself in the
22 position where its position is, in the case of
23 Mr Bradshaw and Mr Posnett, that simply isn't
24 possible to do this week.

25 The position, as Mr Beer has indicated, is
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1 do to seek to put the Inquiry in a position to
2 be able to continue with such witnesses as we
3 are able either to produce relevant documents
4 for in good time, before their scheduled
5 evidence, or to confirm, as per Ms Williamson
6 and Ms Bernard, that there are no such documents
7 to be produced.

8 Can I start then with Mr Bradshaw. The
9 number of emails identified from the party-based
10 search, as distinct from the earlier search on
11 an address book basis, in other words not
12 looking for emails that are tethered to the
13 address book which is contained within Microsoft
14 Exchange but is simply a search for any person,
15 in this case Mr Bradshaw, who was either the
16 sender, the recipient, or copied into or blind
17 copied into an email, it is indeed very
18 extensive indeed. It is approximately 2 million
19 documents.

20 It is important, however, for me to
21 emphasise that that number in itself casts
22 serious doubt on the extent to which this
23 dataset contains duplicates and/or false
24 positives, given the inherent unlikelihood that
25 Mr Bradshaw would have sent, received or been

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1 copied into that number of emails, even over the
2 very significant number of years for which he
3 has been employed by Post Office.

4 The sheer volume of emails identified have
5 meant that it is not yet possible to process the
6 data. The reason is a practically one: the
7 amount of it is too large to transfer to Post
8 Office's third-party disclosure specialists KPMG
9 for processing. So it has not yet been possible
10 to ascertain the level of internal deduplication
11 that's required within those results nor whether
12 there are false positives or other issues with
13 that dataset.

14 Equally, it has not yet been possible to
15 ascertain the extent to which those documents
16 might overlap with documents already harvested
17 by the address book searches, approximately 380
18 of those documents which were disclosed on
19 Friday, or data otherwise available in Post
20 Office's Relativity databases already disclosed.

21 In all the circumstances, having regard to
22 the sheer numbers involved, it is anticipated
23 that there may very well be new and relevant
24 material in the data.

25 What is required before that conclusion can
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1 search approach and we note that that approach
2 obviously has its limitations. That's
3 demonstrated by the position in relation to
4 Ms Bernard, in which 640 emails were identified
5 through the party search and zero relevant
6 documents identified from that dataset.

7 It may also assist the Inquiry to have
8 a sense of the delta between documents
9 identified using an initial search, in this case
10 the party-based search and subsequently
11 identified as being relevant and disclosable, by
12 comparison to the numbers involved in the
13 address book search relating to Mr Bradshaw.

14 By way of starting point, when that primary
15 search was undertaken, around 23,000 documents
16 were identified as relating to Mr Bradshaw. I'm
17 instructed around half of those are parent
18 emails, the rest attachments.

19 Search terms were then applied, resulting in
20 approximately 600 documents for review and,
21 after that review, as you've been informed
22 already, 382 were produced as being relevant.

23 So that is less than 2.2 per cent, about
24 1.6 per cent, of the initial dataset. Now, I'm
25 not saying that the Inquiry can extrapolate from
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1 be reached is that the data is migrated to
2 Relativity for review, to seek to identify
3 documents which fall within the relevant time
4 period, relating to the criminal prosecution's
5 case studies following the rollout of Horizon,
6 and to remove those which fall either side of
7 this period. We're very conscious, of course,
8 that Mr Bradshaw was employed by Post Office
9 both before and after the period in issue.

10 We will need to remove false positive
11 results. We will need to deduplicate the
12 internal duplicates and then, to the extent
13 possible, deduplicate against documents that
14 have been reviewed and/or produced to the
15 Inquiry already. We will then need to run
16 search terms and then review documents for
17 disclosure. I emphasise that isn't set in stone
18 in terms of the order of those factors. That
19 may differ, depending upon the particular
20 datasets and the size of them to come back, but
21 all of those steps will be required.

22 We are confident that the total number of
23 any new and relevant documents will be vastly
24 smaller than the current dataset identified in
25 relation to Mr Bradshaw using the party-based
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1 that that that will be the same when it comes to
2 going from the extremely large numbers
3 identified in the party-based search, but it may
4 provide a useful context to note that the
5 numbers have, when they have started quite high,
6 come down very markedly indeed.

7 The real question then becomes how long will
8 this take? Mr Bradshaw's case is a particularly
9 complicated one because, as I've said, we
10 haven't yet been able to put it on to Relativity
11 but, of course, all endeavours are being made to
12 overcome that particular technological issue.

13 All work is being undertaken as fast as it
14 can be in order to assess the position in
15 relation to Mr Bradshaw. However, it is highly
16 unlikely that we will be able to identify any
17 new documents by the end of this week and
18 certainly, of course, obviously, not in time for
19 him to give evidence today or tomorrow. I can
20 assure the Inquiry that Post Office will
21 continue to work around the knock and through
22 the weekend in order to resolve this issue as
23 fast as possible.

24 The position with Mr Posnett is simpler in
25 the sense that there is no problem with the data
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1 being reviewed. It is already on the Relativity
2 platform and, of course, the numbers are very,
3 very considerably smaller. But again, it is not
4 going to be possible to go through all the
5 required steps to identify only those new and
6 relevant documents before he is due to give
7 evidence tomorrow.

8 We profoundly regret that that is the
9 position.

10 I have been asked by Mr Beer, for
11 understandable reasons, how likely it is, we
12 say, that the relevant documents will be
13 identified for Mr Bradshaw and Mr Posnett. It
14 is very difficult, sir, to give an indication of
15 the likelihood to that event but it does seem to
16 us, simply as a matter of common sense, one
17 certainly cannot rule out there being
18 a significant number often potentially relevant
19 documents in these cases.

20 **SIR WYN WILLIAMS:** When you use the word
21 "significant", Ms Gallafent, just so I get
22 a feel for what we're talking about, are you
23 there talking of upwards of 10, upwards of 100,
24 upwards of 1,000? What sort of ballpark are we
25 in?

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1 getting Mr Bradshaw's documents on Relativity or
2 some other -- or in any other way being able to
3 assess their relevance, can you give me a kind
4 of timescale in the sense of are we talking
5 about days or weeks or what?

6 **MS GALLAFENT:** Sir, I think it may be that we have
7 to take this in stages because I'm sure we can
8 tell you within couple of days whether or how we
9 have managed to transport it to some other
10 repository, such that it can be analysed, which
11 it currently can't in the way that it is stored.

12 It may, depending on the numbers, then,
13 after deduplication, that will be what tells us
14 then how long it will take to go through those
15 processes that I outlined, sir, to go through
16 the deduplication, internal deduplication
17 processes, to then go through search terms, to
18 then go through deduplication against documents
19 already produced to the Inquiry or otherwise
20 held, and then to actually review the documents
21 before working out what pool -- hopefully a pond
22 rather than a pool at this point -- of documents
23 are left.

24 So I would hope that we'll be able to update
25 you at each stage of that, sir, but I think it

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1 **MS GALLAFENT:** Well, if one looks at the way in
2 which the searches have reduced to a relatively
3 small number of documents, we would have thought
4 it would be hundreds rather than anything more
5 than that. But I am speculating --

6 **SIR WYN WILLIAMS:** I'm not holding you to it.

7 **MS GALLAFENT:** No --

8 **SIR WYN WILLIAMS:** I just wanted to know exactly
9 what you meant by "significant", that's all.

10 **MS GALLAFENT:** Yes. So, you know, it will be more
11 than ten, it seems to us inevitably.

12 But more than 100, probably; more than that,
13 I really would be making it up as I go along,
14 I'm afraid.

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

16 **MS GALLAFENT:** But it does seem to us, as a matter
17 of common sense, looking at the scale of
18 numbers, the period of time covered,
19 particularly in relation to Mr Bradshaw, it
20 seems to us a matter of common sense tells us
21 there are likely to be relevant documents as
22 a result of these matters.

23 **SIR WYN WILLIAMS:** Although I appreciate your
24 difficulties in making an assessment of the
25 length of time which will elapse between you

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1 would be remiss of me to overpromise and say it
2 will be by X date. We are doing it as quickly
3 as we humanly can.

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

5 **MS GALLAFENT:** I'm also invited by Mr Beer to
6 indicate Post Office's judgement on the
7 feasibility of calling Mr Bradshaw or Mr Posnett
8 without the disclosure of this material. We,
9 sir, respectfully agree that it wouldn't be
10 appropriate, even if CTI had, as it were,
11 advanced it as a possibility, it wouldn't be
12 appropriate to proceed in the absence of this
13 material having been provided to them and other
14 Core Participants.

15 **SIR WYN WILLIAMS:** Ms Gallafent, although Mr Beer
16 didn't say so expressly, I gained the strong
17 impression from what he said that he didn't
18 think it was appropriate that either of those
19 witnesses should be called prior to further
20 disclosure and everything you've said to me
21 effectively suggests the same.

22 **MS GALLAFENT:** Exactly, sir. We too had understood
23 that to be Mr Beer's position and it is our
24 position as well and that's why I started by
25 emphasising that we fully recognise the

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1 importance of all people in this Inquiry -- the
 2 Inquiry Team primarily but also other Core
 3 Participants -- in having proper and full access
 4 to these documents as early as possible before
 5 giving evidence, and I should mention, of
 6 course, we recognise the inconvenience to
 7 witnesses themselves where late disclosure is
 8 made. That has happened on a regrettably large
 9 number of occasions and we apologise for each of
 10 those occasions.

11 **SIR WYN WILLIAMS:** The last thing that I would like
 12 to ask you is that there are witnesses who are
 13 not too far down the line in terms of when they
 14 are due to give evidence --

15 **MS GALLAFENT:** Yes.

16 **SIR WYN WILLIAMS:** -- who might fall into the same
 17 category, if I can try and put it as neutrally
 18 as possible, as Mr Bradshaw and Mr Posnett,
 19 ie having important evidence to provide to the
 20 Inquiry, but might also be discovered to be in
 21 a category of witness where disclosure is not
 22 yet complete. That's very convoluted but you
 23 know what I mean.

24 **MS GALLAFENT:** I do, sir. Can I start with next
 25 week's witnesses?

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1 priority with a view to producing any relevant
 2 documents this week.

3 Mr Whitaker, we are still awaiting the
 4 urgent conclusion of an address book search,
 5 that's the primary search approach, for
 6 Mr Whitaker. But we have already requested the
 7 back-up, from an abundance of caution,
 8 party-based search as well. As with the other
 9 witnesses schedule for next week, any relevant
 10 documents identified as a result will be
 11 reviewed as a top priority.

12 The other witness next week is Mr Tatford,
 13 Warwick Tatford, who is independent counsel, not
 14 an employee of POL and therefore no address book
 15 search has been undertaken as he wouldn't have
 16 a postoffice.co.uk address.

17 Instead, a party-based search has been
 18 requested for which again Post Office is
 19 awaiting the results and, as with the others, we
 20 hope that those will be available tomorrow and
 21 we will be in a position to review them as
 22 a priority and disclose any documents this week.

23 So that is, as it were, the next stage, and
 24 I have spoken about this week's witnesses and
 25 next week's witnesses.

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1 **SIR WYN WILLIAMS:** Yes.

2 **MS GALLAFENT:** First of all, Catherine Oglesby, who
 3 of course is another civil rather than
 4 a criminal case studies witness. Address book
 5 searches for her have returned nil hits. There
 6 are no hits for that.

7 Party-based searches have been conducted for
 8 the period 2003 to 2009. 724 documents have
 9 been identified. Those have all been reviewed
 10 and found not to be relevant.

11 We are an running additional party-based
 12 search, in other words the alternative,
 13 perceived to be back-up, search if you can't
 14 find documents on a -- sorry, the back-up
 15 additional searches in this case, for the latter
 16 period, which is 2009 to 2016. We will review
 17 any additional documents coming out of that time
 18 period as a top priority with a view to
 19 producing any relevant documents this week.

20 Mr Utting and Ms Stapel are procedurally in
 21 the same boat. Address book searches did not
 22 yield any returns. Party-based searches have
 23 been requested. We are awaiting the results of
 24 that search. We hope to have those tomorrow.
 25 It will review any documents identified as a top

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1 Can I just, although I wasn't invited to do
 2 so, perhaps give you, sir, an indication of the
 3 question that I'm sure, sir, you will have in
 4 your mind, which is what happens then?

5 Can I just flag as Mr Beer has done, the
 6 letter from Burges Salmon from later last night,
 7 setting out some of the other potential -- and
 8 I emphasise the word "potential" -- disclosure
 9 matters in relation to the number of further
 10 potential repositories.

11 Post Office has always sought to be open and
 12 transparent with the Inquiry, as to potential
 13 further sources of relevant documents, as well
 14 as the difficulties associated with some of
 15 them. We cannot rule out the existence of some
 16 relevant documents in these repositories before
 17 harvesting and analysing them. That said, based
 18 on Post Office's experience in relation to the
 19 back-up tapes, which as you'll be well aware,
 20 sir, have been the subject of intense extensive
 21 and intensive review over the last month or so,
 22 it may well be that there are very few relevant
 23 documents ultimately found to be held on those
 24 repositories that have not already been
 25 harvested, reviewed and produced to the Inquiry.

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1 The Post Office notes that when the issue of
2 the back-up tapes arose shortly before the
3 evidence of Ms Chambers on 26 September this
4 year, you adopted, sir, what might fairly be
5 described as a constructive and pragmatic
6 approach by continuing to hear her evidence,
7 subject to three points and, indeed, the
8 evidence thereafter of other witnesses.

9 The first was the need for close monitoring
10 of the disclosure process during the remainder
11 of the Inquiry; the second was the potential for
12 witness evidence in relation to the back-up
13 tapes for the purpose of the disclosure hearing
14 scheduled for January 2024; and the third was
15 the potential for the Inquiry to request further
16 witness statements or recall witnesses back to
17 give further evidence in the event that relevant
18 material is disclosed after a witness has given
19 evidence or, if disclosed beforehand, where the
20 Inquiry has not had the opportunity to process
21 it and I would respectfully add to that where
22 also other Core Participants would not have had
23 the opportunity to do so and the documents are
24 of such relevance that they should have had that
25 opportunity before the witness gives evidence.

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1 potentially thereafter.

2 As we noted, in our view, it is possible
3 then to proceed with two more of this week's
4 witnesses without any issue arising and
5 potentially possible to continue with next
6 week's position of the witnesses proceeding. We
7 will confirm that as soon as possible.

8 The Inquiry may think, in these
9 circumstances, that that is the appropriate
10 point, when we have provided more information to
11 the Inquiry, dependent upon current searches,
12 and enquiries, at which to determine whether to
13 press on with such witnesses for whom there are
14 no relevant documents to be found on
15 Exchange/365 or for whom relevant documents have
16 been identified and disclosed in adequate time,
17 for the Inquiry and other Core Participants to
18 process them, or to adjourn Phase 4 generally.
19 We submit that that -- the timing of that
20 decision and the point is once the position is
21 clearer in relation to next week's witnesses.

22 That is subject to two points. First, it
23 could be suggested that Mr Jenkins could give
24 his evidence in relation to Phase 3, as
25 currently scheduled. Post Office fully

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1 Sir, it may be that you consider a similar
2 approach would now be justified in all the
3 circumstances. Post Office equally recognises
4 that, given the particularly sensitive and
5 important stage which the Inquiry has reached in
6 Phase 4, and the potential significance of the
7 data held on Exchange/365, for a number of
8 witnesses who played a key role in a number of
9 the criminal prosecution case studies, as well
10 as issues potentially arising from further
11 repositories, you may consider it would be more
12 appropriate to adjourn the hearings more
13 generally following hearing from such witnesses,
14 as it appears to be at least common ground for
15 this week, can be heard in the meantime.

16 We would respectfully suggest that any such
17 decision is made in the light of the fullest
18 information that Post Office can put before the
19 Inquiry as to the scope of the work required to
20 analyse the further repositories and the number
21 of documents involved, as well as, of course,
22 the matters in relation to the Exchange/365
23 issues, on which we are hoping to update the
24 Inquiry as soon as possible this week, both in
25 relation to next week's witnesses and

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1 recognises any such decision would need to be
2 informed by submissions from his representatives
3 as to the desirability and/or practicability of
4 splitting his evidence in this way.

5 The Inquiry may wish to note in this context
6 that the Post Office is currently reviewing
7 documents which have been found in Exchange/365
8 in relation to Mr Jenkins via the party-based
9 searches, him obviously not having been
10 an employee of the Post Office, and there may be
11 a not insignificant number of documents, in the
12 hundreds, I believe, to be disclosed before his
13 evidence currently scheduled for the end of
14 November/beginning of December.

15 Post Office should be in a position to
16 produce any such documents next week but we can
17 obviously provide updates this week in that
18 respect.

19 Secondly, it may be that Mr Atkinson, King's
20 Counsel could also give his evidence in relation
21 to the criminal case studies, which we
22 understand would be based on contemporaneous
23 documents, rather than evidence to be heard in
24 this second part of Phase 4.

25 However, I would emphasise that we consider

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1 these to be very much matters for the Inquiry,
2 rather than Post Office, to make any particular
3 submission upon.

4 I would like to conclude by reiterating Post
5 Office's profound regret that this situation has
6 arisen and by apologising frankly to you, sir,
7 the Inquiry Team, the witnesses affected by
8 these issues and to the other Core Participants
9 and their representatives for all the undoubted
10 inconvenience caused.

11 Thank you.

12 **SIR WYN WILLIAMS:** Thank you. Now, it seems to me
13 to be clear that both Mr Beer and Ms Gallafent
14 provide strong reasons why Mr Bradshaw and
15 Mr Posnett cannot give evidence this week and,
16 therefore, my very strong preliminary view is
17 that I should postpone their giving of evidence
18 but if any Core Participant either present or
19 represented wishes to argue against that and
20 wishes to argue that either or both should give
21 evidence, and then, if necessary, be recalled if
22 further documentation comes to light, I would
23 like to hear them articulate that now, so that,
24 if my preliminary view is to be shifted, it is
25 shifted sooner rather than later.

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1 I do not expect anybody to respond with any
2 definitive submissions because I want everybody
3 to reflect upon how best we should proceed in
4 these difficult circumstances.

5 But all that said, if there are Core
6 Participants like Mr Jacobs -- or
7 representatives, I should say, of Core
8 Participants, like Mr Jacobs -- who wish to
9 make, and I stress the word, "short" submissions
10 about where we are, then now is the time for me
11 to hear them.

12 I stress the word "short" not to in any way
13 minimise the seriousness of the situation we
14 find ourselves in but simply because I take the
15 view that these issues are dealt with after
16 reflection and not in the heat of the moment, so
17 to speak. So that I will hear short submissions
18 but I stress the word "short".

19 So first of all, Mr Jacobs, since you've
20 already indicated a wish to make some
21 submissions, over to you.

22 **Submissions by MR JACOBS**

23 **MR JACOBS:** Thank you, sir. I act for Shazia
24 Saddiq, who sits two to the right of me next to
25 Mr Stein. Her case is affected by the actions

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1 So does anybody wish to advance that
2 possibility?

3 **MR JACOBS:** I have been asked to convey some
4 instructions from my clients, sir, which doesn't
5 relate to that issue but I don't know if you
6 could hear me briefly on those points.

7 **SIR WYN WILLIAMS:** Well, we will come to any other
8 points. I'm not shutting everyone up at this
9 stage, I'm simply trying to deal with matters in
10 a way that at least appears to me to be logical.
11 So does anybody, in effect, wish to oppose me
12 postponing the evidence of Messrs Bradshaw and
13 Posnett?

14 Right, clearly no one does and so I say now
15 formally that they will not give evidence this
16 week. They will give evidence on dates to be
17 fixed in the light of how we proceed with
18 disclosure issues.

19 Now, so far as the general issues with have
20 been raised by Mr Beer and Ms Gallafent, you
21 will -- the Core Participants will have had some
22 opportunity to grasp what is going on, just as
23 I have, but, in respect of what Ms Gallafent has
24 said and indeed some of the suggestions she has
25 made as to the future conduct of the Inquiry,

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1 of Mr Bradshaw and she travelled with her
2 husband today to the Inquiry, leaving quite
3 early this morning, both taking time off work to
4 do so. We have also taken instructions from
5 Joan Bailey, who can't be here today but is
6 following remotely, and I've taken instructions
7 from both of these clients on the documents that
8 were available.

9 Yesterday, Howe+Co had a conference with 58
10 of our clients and their overriding concern in
11 relation to the Phase 4 hearings is what they
12 cries as "corporate amnesia". They are worried
13 that witnesses are saying, "I had nothing to do
14 with this case, I don't remember anything about
15 it, it was a long time ago", and what has
16 reassured them is that the documents that the
17 Inquiry -- and we saw it this morning -- puts to
18 such witnesses are able to assist greatly in
19 establishing the facts.

20 So, in relation to what has been said by
21 Ms Gallafent this morning, it's not a matter
22 about Core Participants not receiving proper
23 notice. We say we must have disclosure in good
24 time in order to properly represent and act for
25 our clients.

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1 One of the concerns that our clients have in
2 relation to these recent events is the timing.
3 We heard from Mr Beer this morning that, in
4 relation to Mr Bradshaw, the Inquiry was
5 notified at 8.24 pm on Friday had there were 382
6 documents in relation to Mr Bradshaw. At 8.29
7 last night, the Inquiry was told that there are
8 very significant -- there's a very -- there's
9 a great volume of material in addition in
10 respect of Mr Bradshaw and there was further
11 communication at 11.14 pm last night.

12 Sir, we saw with Mr Jenkins in July that the
13 Post Office located large numbers of documents
14 and notified the Inquiry of this, practically
15 right before Mr Jenkins was due to give
16 evidence. So this is the second time with
17 Mr Bradshaw that this has happened.

18 Our clients are concerned. They do not want
19 an adjournment but they accept that it is far
20 better to prepare questions for witnesses and to
21 have conferences and for them to give their
22 instructions when we have all the material
23 available. So they would prefer that matters
24 are delayed so that we can have proper
25 disclosure.

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1 it can do to ensure that this doesn't happen
2 again. Thank you, sir.
3 **SIR WYN WILLIAMS:** Well, Mr Jacobs, there have been
4 occasions in this process when I have felt like
5 trying to rewrite some of the Inquiry Rules but
6 I am bound by them and it is not part of my
7 terms of reference to rewrite them,
8 unfortunately.

9 All right. So does any other legal
10 representative wish to make similarly short
11 submissions even?

12 **MR MOLONEY:** Sir, yes please, but I assure you
13 they'll be very short.

14 **SIR WYN WILLIAMS:** That's all right, Mr Moloney,
15 just wait until you're on camera with me, if you
16 would, please.

17 Oh, you are, fine.

18 **Submissions by MR MOLONEY**

19 **MR MOLONEY:** Thank you. Sir, once again, we're
20 faced with disclosure failure by the Post Office
21 and, as always, it impacts our Core
22 Participants. We've also already met with Core
23 Participants to receive their input into the
24 anticipated evidence of the two witnesses most
25 affected by this non-disclosure and it's

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1 But another concern that they have is that
2 they are worried that there seems to be
3 a pattern emerging now, whereby the Post Office,
4 very late in the day -- and this is the second
5 time it has happened the day before a witness is
6 due to give evidence -- informs the Inquiry that
7 new disclosure is available or has become
8 available. Our clients say this is simply good
9 enough -- this is simply not good enough,
10 I ought to say, and would ask whether the
11 Inquiry can impose a mechanism on the Post
12 Office to prevent what they see as abuses of the
13 disclosure process by the Post Office in this
14 Inquiry.

15 I conclude by saying that we have made
16 representations on disclosure, dated 19 December
17 2013 and 2 February 2013, and one of the things
18 that we said is that there is a perception from
19 our client group that the Post Office is seeking
20 to control these proceedings through frustrating
21 the disclosure process and that is our client's
22 concern and I am instructed to raise that with
23 you.

24 Essentially, they say this isn't good enough
25 and they would like the Inquiry to do whatever

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1 obviously very frustrating for all of them.

2 Our primary concern on behalf of the Core
3 Participants we represent is to ensure that the
4 Inquiry fully investigates the issues before it,
5 whilst maintaining momentum, so that our Core
6 Participants receive the Inquiry's conclusions
7 within a reasonable time. We're of the view
8 that the course proposed by Counsel to the
9 Inquiry is most likely to meet our concern and
10 we therefore endorse it, but we have one request
11 to add, sir, as you would expect.

12 As we go forward, we ask that any new
13 material is provided to Core Participants in
14 good time for them to assist the Inquiry with
15 the relevant witnesses. That's all we wish to
16 say, sir.

17 **SIR WYN WILLIAMS:** Thank you, Mr Moloney.

18 Ms Page, I can see you just beyond
19 Mr Moloney, as it happens. Do you wish to make
20 submissions?

21 **Submissions by MS PAGE**

22 **MS PAGE:** Also very briefly, sir, to say, first of
23 all, that I support everything that has been
24 said already by those acting for subpostmasters
25 before me, but also to let you know, let the

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1 Inquiry know, that Janet Skinner sets beside me.
2 She travelled down yesterday. She has stayed
3 overnight in a hotel. Travelling and moving
4 around is not particularly easy for Mrs Skinner
5 and it also takes a toll, emotionally, and it's
6 draining.

7 So we ask, above all, that if this pattern
8 continues, Post Office gives proper notice so
9 that people know it's coming up and that they
10 don't travel. It simply isn't fair.

11 Secondly, I would ask also that some
12 consideration is given to past witnesses. In
13 the scrabble to make sure that the Inquiry
14 hearings are able to maintain some sort of
15 momentum, it is important to remember that
16 there's been quite a number of witnesses already
17 in Phase 4, leave aside previous phases, and I'm
18 thinking in particular of the case study of Lee
19 Castleton, where nearly all of the witnesses
20 have already given their testimony, and so it's
21 important that we don't forget that there may be
22 some very important and significant documents
23 which weren't put to them.

24 **SIR WYN WILLIAMS:** Yes.

25 **MS PAGE:** Thank you. That's all I wish to add.

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1 it's important that we make that clear on his
2 behalf now, that this may have important
3 consequences in relation to that. I'm grateful
4 to you, sir.

5 **SIR WYN WILLIAMS:** Thank you, Ms Dobbin.

6 Anyone else before I ask Mr Beer whether he
7 wishes to exercise the right he reserved to
8 himself to reply.

9 **MR BEER:** Thank you, sir, can I now exercise that
10 a right but a request to further address you?

11 **SIR WYN WILLIAMS:** Yes.

12 **Reply by BEER**

13 **MR BEER:** In relation to Messrs Bradshaw and Posnett

14 I had not set out the position of Counsel to the
15 Inquiry clearly, and that was deliberately so.

16 That's because it was not my application to
17 adjourn these witnesses. We, as your counsel,
18 want to get on with the business of calling
19 witnesses. We, as your counsel, want to get on
20 with the business of progress in this Inquiry.

21 But the conduct of one of the Core Participants
22 is presently standing in our way.

23 Accordingly, as has now occurred, it should
24 be that Core Participant, who is standing in the
25 way of the Inquiry, who is preventing progress

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

2 Anyone else wish to make submissions? Yes?

3 **Submissions by MS DOBBIN**

4 **MS DOBBIN:** May I say --

5 *(Unclear -- off microphone)*

6 As you know, sir, in a series of submissions
7 to you, we set out our concern that he was being
8 asked by the Inquiry to provide a witness
9 statement and also to give evidence on oath
10 before you when disclosure was an evolving
11 picture. My learned friends may not know this,
12 but you will, that a very detailed draft witness
13 statement was submitted on Mr Jenkins' behalf
14 only this week. We wrote to the Inquiry on
15 26 October, prior to that submission, to try to
16 ascertain what the position in respect of
17 disclosure was and the extent to which there
18 might be outstanding disclosure, which was
19 relevant to his position.

20 We can only say on his behalf that, having
21 submitted that draft statement to the Inquiry,
22 we are alarmed and profoundly concerned to find
23 that, yet again, there may be another
24 substantial body of material relevant to him
25 that has not yet been disclosed, and I think

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1 in the Inquiry, who should come to the Inquiry
2 and state plainly that its own conduct is
3 preventing progress.

4 This is, of course, the latest in a series
5 of disclosure failings by the Post Office. They
6 may be forgotten to many. They're etched in the
7 memory of those who sit on this side of the
8 room:

9 Hard copy documents found in new Post Office
10 locations; the use or misuse of search terms
11 when conducting the disclosure exercise;
12 an improper deduplication exercise; a failure to
13 consider families of documents when giving
14 disclosure; a failure to disclose blind copy-ees
15 to emails; the failure to give disclosure of
16 documents held on back-up tapes; the failure to
17 give disclosure of native emails.

18 Looking at this latest disclosure failing,
19 we say, having heard from all of the Core
20 Participants, that the following factors confirm
21 the preliminary indication that you gave,
22 firstly the date range. It seems, on what we
23 know now, this repository of material, to
24 concern emails from 2012 onwards. What we have
25 seen in the Inquiry so far, when we have been

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1 allowed to see materials after 2012, is that
 2 important material is generated in the years
 3 after 2012, not only about the reaction to the
 4 unfolding scandal described by some as
 5 a cover-up, but such material also relates to
 6 events before then. It's a reflection backwards
 7 to what people were saying and doing at the
 8 time, ie from 2000 to 2012.

9 Secondly, the means of communication here:
 10 emails. We have found that some employees and
 11 staff of the Post Office speak rather frankly
 12 and openly when they communicate by email, not
 13 quite at the level of some WhatsApp
 14 communications, but approaching it.

15 It has been so far the email traffic, a rich
 16 seam of evidence with which to ask witnesses
 17 about their conduct and their state of
 18 knowledge. This is email communication and,
 19 therefore, we consider that it is likely to
 20 contain important data sources to be able to
 21 test if such witnesses adopt the position, their
 22 claims that they have no present recollection of
 23 the events about which they are being asked.

24 Thirdly, sir, the individuals concerned, as
 25 I said already, Messrs Bradshaw and Posnett,

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1 big decisions as to the way forwards.

2 As to the immediate future after this week,
 3 ie next week's witnesses, you'll recall that the
 4 letters from the Post Office said that they
 5 would update us by the end of the week on the
 6 position in relation to next week's witnesses.
 7 The end of the week is frankly not good enough.
 8 We can't wait until the end of the week to know
 9 whether we're calling witnesses on the following
 10 Tuesday.

11 For next week's witnesses, I would invite
 12 you to direct that by 5.00 pm tomorrow,
 13 Wednesday, the Post Office must state in
 14 relation to each witness for the following week
 15 whether searches have been undertaken of either
 16 of the varieties mentioned by Ms Gallafent and,
 17 if there are documents to disclose, to disclose
 18 them by that date.

19 Sir, that's all I say for the moment.

20 Decision

21 **SIR WYN WILLIAMS:** Thank you. Well, let me confirm
 22 that I propose to postpone the evidence of
 23 Mr Bradshaw and Mr Posnett. I cannot today fix
 24 any date or even likely period when that
 25 evidence will be given, since it's dependent

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1 have a heavy footprint on important events that
 2 the Inquiry is considering.

3 For those three reasons taken together, we
 4 do submit that you should adjourn these
 5 witnesses' evidence.

6 So far as the past is concerned, we are
 7 completely aware -- this is a point made on
 8 behalf of the Hodge Jones & Allen Core
 9 Participants -- we are completely alive to the
 10 point that this new discovery does not relate
 11 only to the present and the future; it relates
 12 to witnesses who have already passed in and out
 13 of the witness box, and we will be on top of the
 14 Post Office in ensuring that they give
 15 disclosure that relates to those who have
 16 already given evidence.

17 As to the future witnesses, we would counsel
 18 you against making any big decisions now.
 19 Nobody has asked you to do so. We were only
 20 told about the scale of the issue by the Post
 21 Office at 8.29 pm last night.

22 The information which the Post Office gave
 23 you in the letters, as supplemented by
 24 Ms Gallafent helpfully today, is still not
 25 sufficiently clear or complete in order to take

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1 upon more detailed and up-to-date information
 2 from Post Office about the extent of the
 3 disclosure which may be relevant to those
 4 witnesses.

5 The other persons who are scheduled to give
 6 evidence this week will give evidence, so that
 7 means there will be a witness tomorrow and
 8 a witness on Friday.

9 I accept the good sense of Mr Beer's
 10 suggestion that I should not make any "big
 11 decisions", in quotes, today about the future
 12 conduct of Phase 4 or anything else. As I say,
 13 I need time to reflect upon all that has been
 14 said and all that is occurring in quite rapid
 15 sequences before I make any big decisions.

16 As to when the Post Office should provide
 17 the next update to the Inquiry, which is the
 18 last point touched upon by Mr Beer, the
 19 suggestion in correspondence, Ms Gallafent, was
 20 an update by the end of the week but I think
 21 Mr Beer has a point when he says that that's
 22 getting perilously close to when the evidence
 23 should start next week.

24 So, unless you seek to deflect me from it,
 25 I think you should update me at the latest by

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1 12 noon on Thursday. That's giving you a little
 2 more time than Mr Beer suggested was appropriate
 3 but I think, in all the circumstances, that's
 4 fair enough, so to speak, and gives us
 5 sufficient time to know where we are going next
 6 week or at least sufficient time for me to make
 7 a sensible decision about where we're going next
 8 week.

9 Is that acceptable to you?
 10 **MS GALLAFENT:** Sir, I'm very grateful for that
 11 extension to midday on Thursday. Can I just
 12 flag up, Mr Beer asked for an update as well as
 13 the documents themselves to be produced by his
 14 deadline. I suspect there may be a tightness in
 15 that timetable for the actual documents to be
 16 produced. We will do everything that we can to
 17 do that, but if we are able to offer an update
 18 with an indication of when the documents be
 19 produced, that may be what we have to do. But
 20 I'm not -- I'm simply saying that from
 21 an abundance of caution because it may be we can
 22 tell you the position but we can't get you the
 23 documents precisely to that time.

24 But we will strive to do what, sir, you've
 25 asked us to do, both in terms of update and the
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1 **SIR WYN WILLIAMS:** Fine. Thank you all.
 2 (1.57 pm)
 3 (The hearing adjourned until 10.00 am
 4 the following day)
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1 documents in accordance with the time frame
 2 you've indicated.

3 **SIR WYN WILLIAMS:** All right, thank you.

4 Then, finally, I'd like to extend my
 5 apologies to the two Core Participants,
 6 Mr Jacobs' client and Ms Page's client, who
 7 travelled quite some distance, I imagine, to be
 8 at the Inquiry today to hear the start of
 9 Mr Bradshaw's evidence. It is extremely
 10 frustrating for you both to find yourselves in
 11 this position and you have nothing but my
 12 sympathy in these circumstances.

13 I think that's all that I propose to say at
 14 the moment. So we'll start again at 10.00
 15 tomorrow morning, Mr Beer?

16 **MR BEER:** Yes, that's right.

17 Sir, we will make enquiries as to whether
 18 any of the three witnesses for this week can be
 19 now bunched up a little, so we can hear them on
 20 two days rather than three, and we'll let the
 21 Core Participants know if that's the case.

22 **SIR WYN WILLIAMS:** Well, I'm sure that everyone
 23 would think that a good idea, if you can bring
 24 it to fruition. So that's fine.

25 **MR BEER:** Thank you, sir, 10.00 tomorrow.
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