

Friday, 17 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, thank you very much.
6 **MR BEER:** May I call Anthony Utting, please.
7 **ANTHONY RICHARD UTTING (sworn)**
8 **Questioned by MR BEER**
9 **MR BEER:** Thank you. Good morning, Mr Utting, my
10 name is Jason Beer and I ask questions on behalf
11 of the Inquiry. Can you give us your full name,
12 please?
13 **A.** Anthony Richard Utting.
14 **Q.** Thank you. Thank you for giving evidence to the
15 Inquiry today and for the provision of a witness
16 statement to the Inquiry. You should have
17 a copy of that witness statement in the bundle
18 in front of you. It's 25 pages in length, dated
19 23 October 2023. Can you take that out, please,
20 in volume 1 at tab A1. If you turn to page 25,
21 you should see a signature.
22 **A.** Yeah.
23 **Q.** Is that your signature?
24 **A.** It is.
25 **Q.** Are the contents of that statement true to the

1

1 started working on the counters; is that right?
2 **A.** That's right, yes.
3 **Q.** In post offices?
4 **A.** Yes.
5 **Q.** In 1990, you joined the investigations team; is
6 that right?
7 **A.** Yes, I had a short period in personnel when
8 I first came off the counters then I joined the
9 investigations team.
10 **Q.** That was initially, you say in your witness
11 statement, as a Postal Officer. What was
12 a Postal Officer in the Investigation Team?
13 **A.** So a Postal Officer was the same grade as I was
14 when I was on the counter. My role in the
15 Investigation Team was really to collate loss
16 reports. So we used to get every loss claimed
17 down from Customer Services and we used to put
18 them onto a spreadsheet, a software package
19 called RapidFile, and then at the end of every
20 month we used to produce a monthly report.
21 So this was all Royal Mail and it was
22 basically to look at where certain types of mail
23 were going missing across the district that
24 I worked at.
25 **Q.** Then eventually you became an Investigation

3

1 best of your knowledge and belief?
2 **A.** They are, yes.
3 **Q.** Thank you. The URN for that -- the document
4 needn't be displayed -- is WITN08200100 and
5 a copy of it will be uploaded to the Inquiry's
6 website. I'm, therefore, not going to ask you
7 questions about everything that's in it, just
8 selected parts of it. Can I start, please, with
9 your professional background. You joined the
10 Post Office in January 1986; is that right?
11 **A.** Yes.
12 **Q.** You left the Post Office in 2007 --
13 **A.** Yes.
14 **Q.** -- when you joined Royal Mail Marketing; is that
15 right?
16 **A.** Yes.
17 **Q.** A job that you, in turn, left in 2017?
18 **A.** I had six several jobs in marketing but, yes,
19 I left the business in 2017.
20 **Q.** If you could just come forward a little bit and
21 make sure you keep your voice up so the
22 microphone picks up everything you say, please,
23 Mr Utting.
24 So in terms of the period between 1986 and
25 2007, if we just break that down, I think you

2

1 Manager; is that right?
2 **A.** I was Acting Investigation Manager. I was on
3 temporary propose from about mid-'92, beginning
4 of '92, I think it was, then I joined POID.
5 **Q.** You joined POID, the Post Office Investigation
6 Department, in 1993; is that right?
7 **A.** I think it was '92, I'm not sure.
8 **Q.** In your statement it says '93 but I won't
9 quibble with you over that.
10 **A.** Right.
11 **Q.** In '95 or '96 you joined Royal Mail Security as
12 a Security and Investigations Manager; is that
13 right?
14 **A.** Yeah, it was the same job but POID was being
15 disbanded so, instead of working for Corporate
16 Centre where we'd been, we just merged into the
17 business unit we were working at, at the time.
18 **Q.** In 1999 you move to the Post Office as
19 an Investigation Manager; is that right?
20 **A.** Yes.
21 **Q.** In 2001 you were appointed an Investigation Team
22 Leader?
23 **A.** Yes.
24 **Q.** At some point thereafter, I don't think you can
25 remember the precise date or even year, you

4

1 became Policy and Standards Manager?
 2 **A.** Yeah, when I became a team leader I went off on
 3 a project for a year to develop the Post Office
 4 Card Account, and, when I came back, shortly
 5 afterwards I became Policy and Standards Manager
 6 but I'm not entirely sure when that was.
 7 **Q.** That would make it about 2002; would that be
 8 right?
 9 **A.** It was probably middle of 2002.
 10 **Q.** Then in 2004 you became the National Internal
 11 Crime and Investigations Manager?
 12 **A.** Yes.
 13 **Q.** You stayed in that role until you moved over to
 14 Royal Mail in 2007, albeit in early 2007 you
 15 took charge of what was called the commercial
 16 security and mails integrity element of the
 17 role; is that right?
 18 **A.** So that was always part of my role when I was
 19 National Investigations Manager. When John
 20 Scott took over as Head of Security he split the
 21 role and I got given the commercial security and
 22 mails integrity part and stopped doing anything
 23 to do with investigations.
 24 **Q.** So from that time, early 2007 onwards, you
 25 weren't concerned with the investigation of the

5

1 giro suppressions. I would imagine I probably
 2 dealt with -- because it was always fluid, so
 3 you had cases at different stages of maturity.
 4 On any one time, I probably had 10 to 15 cases
 5 on the books.
 6 **Q.** You were described from 2004 onwards as the
 7 National Internal Crime and Investigations
 8 Manager. Did you manage a team?
 9 **A.** The whole team.
 10 **Q.** How many people were in the team?
 11 **A.** I think when we started we had 65 and, when we
 12 did the last reorganisation, I think it was down
 13 to about 45.
 14 **Q.** Why was there a reduction?
 15 **A.** Cost.
 16 **Q.** Did that have an impact on the number of
 17 investigations you were able to carry out?
 18 **A.** Oh, yeah, yeah. We changed the trigger points
 19 upwards. I told the business what we would be
 20 doing and why we wouldn't be able to sustain the
 21 effort that we'd put in previously. Obviously,
 22 less people means less capacity and, therefore,
 23 we raised the triggered points and set up less
 24 cases.

We also had to bear in mind that with the

7

1 type of alleged crime that we're concerned with
 2 in this Inquiry; is that right?
 3 **A.** I wasn't concerned with the investigation of any
 4 crime. I was removed completely from that area
 5 of the business.
 6 **Q.** From early 2007?
 7 **A.** Yeah.
 8 **Q.** So looking at the period from 1999 onwards, when
 9 you moved to the Post Office as an Investigation
 10 Manager, until early 2007, which is really our
 11 relevant period for you, did you conduct any
 12 investigations yourself?
 13 **A.** Yes.
 14 **Q.** How many investigations would you yourself
 15 conduct a year, for example?
 16 **A.** When I first started, obviously when I've joined
 17 the Post Office, we still paid benefits via
 18 benefit books and Green Giro cheques, and there
 19 was quite a lot of fraud in that space. And
 20 I probably investigated seven or eight cases
 21 a year of that nature. Then with audit
 22 shortages we would only get involved if we were
 23 called because somebody went to a post office or
 24 the auditors found something.
 25 We had things like pension overstatements,

6

1 removal of pension books and Giro cheques the
 2 fraud on the counter was going to change
 3 considerably and pension allowance fraud cases
 4 took an awful lot of time and, generally, ended
 5 up with trials at Crown Court. And with those
 6 going, there was -- it was like a balancing act
 7 between how much work was going to drop off to
 8 how much resource we could remove.
 9 **Q.** You mentioned a couple of times there "trigger
 10 points". Can you explain to the Chairman what
 11 a trigger point is?
 12 **A.** So when -- when I was Policy and Standards
 13 Manager we wrote a document that basically
 14 listed all of the types of crime or loss that
 15 could occur at a branch and we set -- based on
 16 the seriousness of what it was, we would set
 17 a trigger point to the amount -- the monetary
 18 value that we would get involved with.
 19 So we didn't set trigger points on anything
 20 really, other than the amount of the loss,
 21 because, obviously, we cost money to use and,
 22 therefore, we would set a trigger point based on
 23 the nature of the crime and the value of loss,
 24 as to whether we would get involved or not.
 25 **Q.** So for alleged crime X, Investigations

8

1 Department won't investigate --

2 **A.** Yeah.

3 **Q.** -- unless the value of the alleged loss is Y or

4 above Y --

5 **A.** Yeah.

6 **Q.** -- which might be £10,000/£20,000?

7 **A.** Yeah, if it was a branch office and it was

8 a single counter till and somebody had a £500

9 loss that was completely unexplainable, then we

10 might go straight out and do what we called

11 an open inquiry, which was basically go to the

12 office, interview people and see what you could

13 establish and then go away again.

14 If it was something like an audit shortage

15 the triggers were much higher because the

16 business had its own processes in place, in

17 relation to subpostmaster's contract that unless

18 it was --

19 **Q.** Sorry, if you could slow down a little bit,

20 please. I'm getting the thumbs up from the

21 transcriber there. You speak very quickly and

22 I've asked you a series of relatively open

23 questions and you've given us very full answers,

24 for which I'm grateful, but if you slow down

25 little bit because everything you say has to be

9

1 that sentence -- as a "necessary evil"?

2 **A.** So the senior people that we discussed it with,

3 people like the Federation of SubPostmasters.

4 We used to meet with Colin Baker and a guy

5 called John and a lady -- and I can't remember

6 her name -- periodically, and they all

7 understood what we did and why we were necessary

8 but that didn't make us popular.

9 And in the wider business, obviously a lot

10 of people in Post Office, in the administration

11 function, had previously worked on the counter,

12 and the ID, as we were called, when you're on

13 the counter, we're those nasty people that come

14 and give you a hard time if you have a loss.

15 So we weren't loved by everybody. But from

16 the Post Office perspective, the business was

17 becoming much less of the old style Post Office,

18 as knew when I was on the counter, and much more

19 of a finance-orientated organisation.

20 **Q.** Can you expand on that what you mean?

21 **A.** It just -- obviously, the Post Office was losing

22 money and, obviously, I'm probably not qualified

23 to -- I was the Investigation Manager, but the

24 Post Office was becoming much more cost

25 conscious so, at every opportunity, if they

11

1 typed up, as you say it.

2 **A.** That's fine.

3 **Q.** So just going back to the trigger points, you

4 said that with the reduction in numbers of staff

5 from 65, roughly, at the beginning, until 45,

6 roughly, at the end of your period of tenure,

7 that caused you to raise the trigger points; is

8 that right?

9 **A.** Yes.

10 **Q.** Can you give us a general impression, for this

11 period, say end '99 until early 2007, you were

12 an Investigator and a Manager of

13 Investigators --

14 **A.** Yes.

15 **Q.** -- what was it like, working within the Post

16 Office in that period?

17 **A.** So the Investigation Team was quite detached

18 from the business because, obviously, the nature

19 of what we did didn't always make us popular

20 with people. So we were always seen as the --

21 they used to describe us as a necessary evil on

22 occasion.

23 **Q.** Just slow it down again.

24 **A.** Sorry.

25 **Q.** Who would describe you -- who is the "they" in

10

1 could take out cost, then they would do so and

2 there was also a drive to be much more formal in

3 relation to postmaster contracts and recovering

4 losses and that sort of thing.

5 It became a much less friendly organisation,

6 where everyone felt part of a family, and much

7 more a quite stern business and it was much more

8 contract related.

9 We used to have quite a difficult time with

10 Fujitsu around Horizon and they used to always

11 create the contract and the commercials, and if

12 we wanted to the business to do anything, then

13 it was always about how much it was going to

14 cost to do and everything else, and that wasn't

15 always the case previously. And there's good

16 reasons for doing things that way but it just

17 meant that the Post Office changed.

18 **Q.** What did that change in this period, what effect

19 did that have on the nature of the work that you

20 were undertaking in investigations?

21 **A.** It didn't have a massive effect, other than the

22 fact that, when I took over, we had a certain

23 number of cases on hand amongst the

24 Investigators and, obviously, with the amount of

25 resource reducing --

12

1 Q. Just slow down.
 2 A. Sorry. With the amount of resource we had being
 3 cut, I set a drive in place and said all of the
 4 old cases that we've got need to be closed, and
 5 got it quite strict with the Investigators and
 6 told them that every case had to be shut that
 7 was over six months old, unless there was a good
 8 reason not to, which made me even less popular
 9 with the Investigators.

10 But, ultimately, if you're managing to cost,
 11 there's only so much you can do and the
 12 Investigators had massive workloads and we
 13 needed to make sure that it wasn't ridiculously
 14 so.

15 Q. This drive -- I think you, amongst the things
 16 you said, included a drive to not only cut cost
 17 in the expenditure of resource on investigations
 18 but also in the recovery of money from
 19 subpostmasters?

20 A. I don't think it was just subpostmasters; it was
 21 any loss that the business incurred, they were
 22 becoming much more inclined to pursue it. We
 23 introduced financial investigations under my
 24 control, and part of that was to aid our ability
 25 to recover monies more quickly, when criminal

13

1 to the Assets Recovery Agency and they said
 2 "Yeah, we can train them", and I think the DWP
 3 went the same way.

4 So we employed -- well, we didn't employ
 5 financial -- we trained some of our own
 6 Investigators to become Financial Investigators.

7 Q. Were the majority of the Investigators in the
 8 ID, like you, former counter staff?

9 A. We had a mixture. So we had guys that were
 10 ex-police, we had guys that were ex-forces. We
 11 had people that had come in from outside the
 12 business. I would say the people we recruited
 13 more latterly tended to be Post Office because
 14 the Post Office didn't want to recruit
 15 externally at the same time they were making
 16 people redundant internally.

17 So I think more latterly, it was mostly
 18 internal, while I was there. I think after I'd
 19 left it changed again.

20 Q. Thank you.

21 Can we turn to the next topic, please, which
 22 is the production of Post Office policies,
 23 concerning investigations and prosecutions. So
 24 this is focusing on the time in particular when
 25 you were Policy and Standards Manager. That's

15

1 offences had been committed.

2 Q. When were financial investigations instituted.
 3 I mean, in what year, rather than --

4 A. It was either very late 2004/2005. We were
 5 talking about it at the time that Phil Gerrish
 6 left and I took over, but it actually kicked off
 7 while I was in charge.

8 Q. Was that to carry into effect the desire from
 9 senior management to recover as much money as
 10 was possible from subpostmasters?

11 A. I don't think it was so much a drive from senior
 12 management; I think it was instigated by us, on
 13 the basis that the police were doing it, the
 14 DWP, who we worked very closely in relation to
 15 pension frauds, were doing it. And when we'd
 16 worked with the DWP we'd met a police Financial
 17 Investigator and he'd pretty much offered up --
 18 if the Post Office was prepared to pay the
 19 salary, the police would give us an embedded
 20 Financial Investigator.

21 Because we were more -- the Post Office were
 22 not minded to recruit from external sources at
 23 that stage because they were trying to cut
 24 resource, so we spoke to them and we said "Well,
 25 what about if we train our own?" And we spoke

14

1 from 2002, we've established, I think, until
 2 2004. What was the nature of your role as
 3 Policy and Standards Manager.

4 A. So it was two-fold. One was looking at the
 5 internal policies of Post Office and how they
 6 related to the role that we had, and the other
 7 one was looking at the security and
 8 investigation policies that came from Security
 9 and Investigation Services, and being the
 10 business lead in Post Office Limited to make
 11 sure that they worked for us and that we abided
 12 by what was being set by them.

13 Q. Was it a policy writing function or did part of
 14 your role include ensuring compliance with
 15 policy?

16 A. It was more a writing and management. The
 17 policies were distributed amongst all of the
 18 investigation teams, and it was the
 19 responsibility of the team leaders and the
 20 operations lead to ensure the policies were
 21 being complied with. So I was almost the person
 22 that wrote the stuff; I wasn't the guy that
 23 managed it and policed it within the business.

24 Q. Thank you. Can we look at some examples,
 25 please. These will come up on the screen for

16

1 you, and start, please, with POL00039960.

2 We can see the title of the policy
3 "Investigation and Prosecution Policy". If we
4 scroll to the foot of the page, if we just keep
5 going, we can see that it's dated February 2003
6 and, therefore, is in the relevant period that
7 we're looking at: some point in 2002 until 2004.

8 If we can turn to the second page, please,
9 and scroll down, please, we can see that the
10 author is said to be the "Law and Legislation
11 Programme Manager".

12 **A.** Yeah.

13 **Q.** Can you remember who that was and where they sat
14 in the business?

15 **A.** I'm not 100 per cent. I think that was actually
16 John Messenger, who is the final review.

17 **Q.** The final reviewer, at the bottom of the page?

18 **A.** Yeah, it may be him, it may be someone who
19 worked under him. John was the person that
20 I liaised with around these policies at that
21 time.

22 **Q.** In which department did John work?

23 **A.** He worked for Security and Investigation
24 Services, so he was part of Andrew Wilson's
25 central Security team.

17

1 to update them on what the policy now said.

2 **Q.** If we go back to page 1, please. We can see the
3 purpose of the policy set out at the top:

4 "The aim of this policy is to set out the
5 criteria against which we investigate crimes and
6 suspect crimes committed against our Business
7 and also define when actions proceed under
8 criminal law."

9 Then scrolling down "Introduction":

10 "Our Business and reputation depends on the
11 integrity of its employees and procedures
12 [et cetera]."

13 "Reporting Offences

14 "Crimes or suspect crimes against the
15 following must be reported to Corporate Security
16 or the appropriate Business Security and
17 Investigation Unit ..."

18 Can you explain what the difference between
19 Corporate Security and appropriate Business
20 Security and Investigation Unit is, please?

21 **A.** So Corporate Security was part of the Corporate
22 Centre of the business at the time. So Royal
23 Mail -- I think it was Royal Mail Group then or
24 it might have been Royal Mail Holdings, I can't
25 remember -- but it was made up of a Corporate

19

1 **Q.** We can see that that under "Assurance Details"
2 your name appears?

3 **A.** Yes.

4 **Q.** Can you tell us what does the title "Assurance"
5 or the appearance of you as having given
6 assurance for a document or a policy like this
7 mean?

8 **A.** It would mean that I'd read it, ensured that it
9 was suitable for us in Post Office Limited and
10 then I would sign it off on behalf of Tony Marsh
11 to say that this policy would apply to our
12 investigations.

13 **Q.** How would you carry out that role or discharge
14 that responsibility?

15 **A.** So I was really just looking at the policy to
16 ensure that it was still current. A lot of
17 these policies, they weren't written on the
18 spot; they were probably reiterations of older
19 policies and they were just being updated every
20 year. So I would read them through and make
21 sure they were still current and applicable in
22 Post Office Limited, sign them off, and then
23 there would either be a circular from Corporate
24 Security or, if they didn't send a circular, we
25 would send a circular out to our Investigators

18

1 Centre which was the core part of the
2 headquarters function, and then below that were
3 all of the different business units.

4 So we had Royal Mail International, Royal
5 Mail, Parcelforce, Post Office Limited and
6 I think it was -- I can't remember what they
7 were called now, Romec but they may have gone by
8 then, that was the engineering function. And
9 each of those business units had their own
10 security function. Corporate Security has sort
11 of a dotted line management responsibility, so
12 they set policy and the business unit signed it
13 off and abided by it.

14 **Q.** To be clear, this is a policy issued by the
15 centre; is that right?

16 **A.** Yes, if John Messenger's name is on it,
17 probably, yes.

18 **Q.** But it applied to Post Office --

19 **A.** Oh yes, yes.

20 **Q.** -- and that's why we see your assurance details
21 on it?

22 **A.** Yes.

23 **Q.** So:

24 "Crimes or suspect crimes against the
25 following must be reported ... or liaison with

20

1 the police ..."

2 Then they're listed:

3 "Each case [at 3.3] will be dealt with on

4 merit and action taken ... will be in accordance

5 with the disciplinary code of the business.

6 "Where evidence of crime committed by

7 an employee of Royal Mail Group (including Post

8 Office Limited) against Royal Mail Group

9 (including Post Office Limited or its customer

10 is established, the offending employee may also

11 be dealt with in accordance with criminal law.

12 The prosecution guidelines of the business will

13 be used in making any decision to proceed under

14 criminal law, in consultation with Legal

15 Services Criminal Law Division."

16 What does this actually tell us?

17 **A.** It just tells you that everybody in the Post

18 Office is subject to the disciplinary procedures

19 but, if a suspect crime is considered, then the

20 Investigation Team may be involved.

21 **Q.** The purpose of the policy was to set out

22 criteria against which crimes and suspected

23 crimes would be investigated. It doesn't really

24 do that, does it?

25 **A.** I've read this policy when it was sent to me.

21

1 You say:

2 "I have been asked to describe what the

3 process was for dealing with complaints

4 regarding the conduct of an investigation by the

5 Security team. I have no recollection of any

6 formal process, but can say that all Security

7 Team managers and staff were subject to the same

8 disciplinary procedures as other members of Post

9 Office staff, save that where any serious

10 allegations were made, these could be referred

11 to the Corporate Security Team who would

12 undertake an independent investigation of what

13 went on 'outside of the line'. These

14 investigations would normally be undertaken

15 where there was an allocation of serious

16 misconduct, or a suspicion of criminality.

17 There was also a team of Harassment

18 Investigators who would investigate allegations

19 of bullying and harassment from across the Royal

20 Mail Group and Investigators could also be

21 investigated via that route."

22 **Q.** Can you tell help us, can you recall of any

23 instances in this seven-year period that we're

24 looking at, six or seven-year period, where

25 an investigation was commenced into a complaint

23

1 I did this 20 years ago. At the time, I would

2 probably have read it and said "Yeah, that'll

3 do". Reading it now, I can't 100 per cent say

4 I understand what it says but I think,

5 basically, what it's saying that -- this is

6 a Security policy, so the only people that would

7 see this would be people within the Security

8 team and, basically, it's telling them that if

9 there is a crime suspected, then the

10 Investigation Team may become involved and look

11 into it.

12 What it doesn't say is that if the

13 Investigation Team became involved, usually the

14 disciplinary would go on hold until we conducted

15 our preliminary enquiries.

16 **Q.** It doesn't really set out criteria in which --

17 **A.** No, it doesn't give the sorts of criteria we

18 discussed earlier, like the triggers that we --

19 where we would get involved.

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

21 In your witness statement -- there's no need

22 to turn it up at the moment -- well, in fact

23 we'd better. Page 7 of your witness statement,

24 please. It'll come up on the screen for you.

25 So WITN08200100, at page 7, and paragraph 17.

22

1 regarding the conduct of a POID or ID

2 Investigator?

3 **A.** Yes.

4 **Q.** Without giving the details of the exact -- the

5 names or similar -- what kind of complaints were

6 made and investigated?

7 **A.** Without giving details, it's very difficult to

8 describe.

9 **Q.** Go ahead.

10 **A.** So we had an allegation about a group of Royal

11 Mail Investigators who were sexually harassing

12 a member of the team. I was involved in that

13 investigation. Then there was an -- there's

14 an allegation of a Senior Manager in Corporate

15 Security behaving improperly at an out-of-work

16 function; I was involved in that investigation.

17 As a result of the first investigation,

18 I was investigated for harassment -- no, that

19 was the second one. The first one, I was

20 investigated for -- I think that was probably

21 described as harassment as well. So we were

22 investigating our own Investigators -- well,

23 they weren't ours; they were another group's

24 Investigators -- and, as a result of both those

25 investigations I ended up the subject of

24

1 an investigation myself.

2 So there were periodically instances of
3 people within the Security team being
4 investigated for different things but it was
5 always done outside of the team they were in.

6 **Q.** This investigation of the Investigators, did
7 that ever concern the quality and nature of the
8 work that they were undertaking, rather than the
9 kind of things that you've just mentioned, which
10 seem to be different species of alleged
11 misconduct?

12 **A.** I think there were reviews of cases. It was
13 a long time ago and I can't remember specifics.
14 I believe, if we had a case -- and I think there
15 was an example of a case that we lost at court
16 or was thrown out because of a breach of PACE,
17 and I can't remember details, and I think that
18 was investigated. And the right people to look
19 at that were Legal Services and Corporate
20 Security because they were the people in the
21 business that had the expertise necessary to
22 look at what went wrong and why.

23 **Q.** Thank you. That document can come down.

24 So investigations might arise from the way
25 in which a case was disposed of at court?

25

1 solicitors, and then what?

2 **A.** If there was a remedial training requirement for
3 whoever the Investigator might have been, then
4 that would have been looked at. If the
5 Investigator had done something wrong, it
6 probably would have been looked into separately.
7 To be honest, I can't fully remember exactly how
8 things would have worked but it wouldn't have
9 just been "Oh, yeah, we failed, here's the
10 report, put it in the drawer"; someone would
11 have looked at it to find out if there were
12 lessons to be learned.

13 **Q.** Okay, can we move on, please, to look at the
14 management of casework or casework management.
15 You tell us in your statement -- this needn't be
16 turned up -- in paragraphs 9 and 10 on page 5
17 and on paragraph 31 on page 12, that you have no
18 recollection of a document that you were shown
19 called "Casework Management" dated October 2002.

20 I just want to look at that document, if we
21 may, please. It's POL00104777. Again, if we
22 look at the foot of the page -- we'll see first,
23 sorry, "Casework Management (England & Wales)"
24 is its title and, if we look at the foot of the
25 page, we'll see the date as October 2002.

27

1 **A.** Yes.

2 **Q.** Was there any form of systemic review of the
3 outcomes of cases that, putting it colloquially,
4 went against the Post Office in court?

5 **A.** I think -- again, it's a long time ago, I think
6 when we lost a case, there would be a report
7 written by counsel to describe what happened and
8 why they thought there'd been a problem.

9 **Q.** To whom would that be sent?

10 **A.** It would be sent usually to Criminal Law and
11 I think Criminal Law would probably have shared
12 it with the leadership team of the business
13 concerned.

14 **Q.** The leadership team, can you be a bit more
15 precise, in the case of Post Office --

16 **A.** In the case of Post Office, it would have been
17 probably Phil Gerrish before me and me, if
18 there'd been one while I was there. I don't
19 remember one, I don't remember seeing one when
20 I was there. But I might have done, I don't
21 know.

22 **Q.** Can you help us -- I mean, it might be difficult
23 if you don't remember one in your tenure -- what
24 was the nature of the review undertaken? So it
25 was written up by counsel, passed to the

26

1 We see from the top of page 1 the "Purpose"
2 of the document:

3 "The aim of this policy is to ensure that
4 adequate controls are in place to maintain
5 standards throughout investigation processes."

6 This is a six-page document. If we look,
7 please, at page 2, and scroll down a little bit,
8 please. That bullet point, second -- now third
9 from the bottom:

10 "The issue of dealing with information
11 concerning procedural failures is a difficult
12 one. Some major procedural weaknesses, if they
13 become public knowledge, may have an adverse
14 effect on our Business. They may assist others
15 to commit offences against our Business,
16 undermine a prosecution case, bring our Business
17 into disrepute, or harm relations with major
18 customers. Unless the offender states that he
19 is aware that accounting weaknesses exist and
20 that he took advantage of them, it is important
21 not to volunteer that option to the offender
22 during interview. The usual duties of
23 disclosure under the Criminal Procedure and
24 Investigations Act 1996 still apply."

25 So this policy from 2002 appears to

28

1 contemplate, firstly, that procedural weaknesses
2 may exist, that they became public knowledge,
3 they might undermine a prosecution case and that
4 they shouldn't be mentioned in an interview
5 unless the suspect states that they're aware of
6 them. Can you explain what "major procedural
7 weaknesses" might be referring to?

8 **A.** I think there'd be a few things. So when --
9 this is 2002 and that point we were still paying
10 benefits using books and Giro cheques, and when
11 pensions were paid at post offices using books
12 there were a large number of foils at the end of
13 the week to be calculated and sent off. When
14 the foils got to Lisahally in Northern Ireland,
15 they were sample checked.

16 So if you had -- if you were doing a case in
17 relation to pension fraud, you wouldn't want to
18 mention in an interview that they only
19 sample-checked the calculation for pension
20 payments at the end of the week, because if that
21 gets out into the wider Post Office, it might
22 encourage other people to go and do the same.
23 Because the sample check at Lisahally, bearing
24 in mind how many post offices we had and the
25 amount of staff they had, wasn't a regular

29

1 well. So saying things like the cameras that
2 are in the sorting office watching for people
3 stealing aren't always switched on or aren't
4 always being monitored is not something that you
5 would say to someone in an interview. So
6 I think that's implying that sort of thing.

7 **Q.** It's very general, isn't it?

8 **A.** Royal Mail is a very big organisation. So
9 writing a distinct policy for an individual
10 business unit would probably have been a little
11 bit tighter than that.

12 **Q.** Is it reflecting a policy and culture to hide
13 procedural weaknesses?

14 **A.** I would say no, because the last sentence tells
15 you that, at the point that we're going to
16 prosecute somebody, the Criminal Procedure and
17 Investigations Act still applies and, under that
18 Act, we would be duty bound to disclose anything
19 anyway.

20 **Q.** Is it reflective of a policy to avoid issues
21 becoming public because they may harm the
22 reputation of the Post Office?

23 **A.** Potentially. I'm not -- I think potentially
24 that could be argued, yes.

25 **Q.** Can we turn, please, to POL00048361. This is

31

1 occurrence. So when they identified an issue,
2 they would have to then back check that to
3 office for a number of months to find out if it
4 was a one-off or something more serious.

5 So we would never say in an interview to
6 somebody that that sort of process happened
7 because you don't want people to start thinking
8 they can take chances or people to know that not
9 everything was 100 per cent checked under that
10 system.

11 I think when we had Horizon that became
12 probably less of an issue because the Horizon
13 data calculated everything for you -- there were
14 still ways of inflating your pensions because,
15 obviously, you could put something into Horizon
16 and the foil wouldn't be there but the report
17 would say it was. So Lisahally, when they
18 checked, would file that foil was missing and
19 tell us that there were foils missing and,
20 therefore, we could start an investigation.

21 But that's the sort of procedure, I think,
22 that that sort of thing is applying. You have
23 to bear in mind that this is a Corporate
24 Security policy, so it's quite broad, because it
25 would apply in Royal Mail and Parcelforce as

30

1 an Investigation Team report and it's dated, we
2 can see on the right-hand side there, December
3 2006. We've moved on a bit here to the period
4 when you were National Manager. Can you see
5 that?

6 **A.** Yes.

7 **Q.** You can see at the top, and it appears on every
8 page, it says "Post Office Limited Investigation
9 Team Monthly Report". As it says there on the
10 tin, was this a report that was prepared every
11 month?

12 **A.** Yes.

13 **Q.** What was the purpose of the preparation of
14 an Investigation Team monthly report?

15 **A.** It was something that was instigated -- I think
16 it was when I worked with Rod Ismay, Alan Cook,
17 and -- well, Peter Corbett, I think, wanted
18 there to be more visibility of what we were
19 doing and how we were doing it.

20 **Q.** Just breaking that down, Peter Corbett was --

21 **A.** He was a Finance Director, he was one step above
22 my line manager, Rod Ismay.

23 **Q.** So when were these introduced?

24 **A.** I would say the end of 2004, maybe a bit later.

25 I can't remember. I think I wrote about --

32

1 I think I wrote about 12/13 of them. But I was
 2 on holiday one month and Dave Pardoe did it
 3 instead.
 4 **Q.** Did they continue to be written until you moved
 5 on in 2007?
 6 **A.** So when I stopped having involvement in the
 7 Investigation team at the early part of 2007,
 8 I don't know if they were continued. I think
 9 they may have been but I don't know. I had no
 10 involvement with investigations.
 11 **Q.** So you said that Mr Corbett, as Finance
 12 Director --
 13 **A.** Yeah.
 14 **Q.** -- who was the line manager, the boss, of Rod
 15 Ismay --
 16 **A.** Yeah.
 17 **Q.** -- who was your line manager --
 18 **A.** Yeah.
 19 **Q.** -- wanted greater visibility of what the
 20 Investigation Team was doing?
 21 **A.** Yes. I think that's how it started. Yes.
 22 **Q.** And visibility to whom?
 23 **A.** To the POL ET, basically.
 24 **Q.** To the?
 25 **A.** The POL ET, that's the Executive Team in Post
 33

1 didn't -- no one paid much attention to us other
 2 than when something went wrong.
 3 **Q.** You'll see who this report is addressed to. So
 4 it's addressed to the POL Executive Team, the
 5 POL ET -- and you've just listed in broad terms
 6 who that consisted of --
 7 **A.** Yeah.
 8 **Q.** -- to the Director Security Corporate.
 9 **A.** That's Andrew Wilson.
 10 **Q.** So that's back in Royal Mail?
 11 **A.** That's in Royal Mail Corporate, yeah.
 12 **Q.** Head of Investigations Corporate, that's back in
 13 Royal Mail --
 14 **A.** That's back in Royal Mail, that's Phil Gerrish.
 15 **Q.** Head of Criminal Law?
 16 **A.** That's Rob Wilson.
 17 **Q.** That's in Post Office?
 18 **A.** No, Rob Wilson was in Royal Mail.
 19 **Q.** By this time, December '06, yes?
 20 **A.** Yeah, Post Office Limited, all the time I worked
 21 in Post Office Limited, we didn't have our own
 22 Criminal Law Team.
 23 **Q.** Head of Security Post Office Limited?
 24 **A.** That was Tony Marsh.
 25 **Q.** Was that a fairly constant distribution list?
 35

1 Office Limited.
 2 **Q.** Can you explain your understanding of what the
 3 Executive Team consisted of?
 4 **A.** It was pretty much the Post Office Limited board
 5 so Alan Cook -- before him it was David Mills,
 6 after him it was Paula Vennells -- and then
 7 there was Dave Miller; the Commercial Director
 8 who was George somebody; HR Director, Debbie
 9 somebody; obviously Peter Corbett; and I think
 10 there were a couple of others but I can't
 11 remember who they were.
 12 **Q.** Do you know why it was thought that it was
 13 necessary for the highest level within the
 14 organisation to have greater visibility on what
 15 the Investigation Team was doing?
 16 **A.** I can't recall exactly. I think, when I first
 17 met Peter Corbett, when I started working for
 18 Rod, I think Peter Corbett was a little bit
 19 surprised at who we were and what we did and it
 20 may have been that he just wanted more people
 21 across the top of the business to know that we
 22 were there, rather than anything else because,
 23 like I said earlier on, the Post Office
 24 Investigation Team were -- we were in a corner
 25 somewhere and we lived in dark places and they
 34

1 **A.** It was a permanent distribution list. We didn't
 2 send it to anyone else.
 3 **Q.** In general terms, we'll look at this report that
 4 we've got at with us, in general terms, what was
 5 the content of the monthly reports?
 6 **A.** It was just a monthly update on what we were
 7 doing, where we were with things, anything major
 8 that had come up that we were dealing with that
 9 we thought they needed to know about, any
 10 problems or issues that we were having, just so
 11 that they knew what we were doing and if there
 12 were issues, we needed support, this was a good
 13 way of alerting people that we were coming,
 14 banging on the door for things.
 15 **Q.** Did you ever receive any response from the Post
 16 Office Executive Team in relation to these
 17 monthly reports you were writing?
 18 **A.** Err --
 19 **Q.** Did anything come back down?
 20 **A.** I believe I got emails from Alan Cook
 21 occasionally, saying thank you. I had
 22 communications with David Miller reasonably
 23 regularly and I think he found it useful. When
 24 he left, I think Alan Cook sent an email to
 25 Paula Vennells to say this is a useful report,
 36

1 you should pay attention to it.

2 **Q.** Why --

3 **A.** He didn't say anything further than that because

4 he copied me into the email. And I would

5 occasionally have conversations with Phil

6 Gerrish if -- about stuff because he'd been in

7 my role before me and I used him as a bit of

8 a sounding board for things.

9 **Q.** So this was a means of communicating to the Post

10 Office Executive Team the activities of the

11 Investigation Team in the previous month, so

12 that the Executive of the Post Office could be

13 in no doubt what the Post Office Investigators

14 were up to, what their work was in that previous

15 month?

16 **A.** Yeah, it had an element of an ongoing

17 performance report because, obviously, we'd give

18 updates on things we were already doing and

19 general performance measures about how many

20 cases we had, how much money we were

21 investigating, and stuff like that.

22 **Q.** So trends were set out --

23 **A.** Yes.

24 **Q.** -- and forecasts were made?

25 **A.** I believe so, yes.

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1 areas of weakness where fraud or theft could

2 potentially occur and try to help with

3 processes. That was done in conjunction with

4 the Security Team and they -- and the Audit

5 Team, and they usually led on those things. But

6 if we did an investigation and found something

7 that was wrong, then we would highlight it in

8 order that it could be addressed.

9 On the product side we would look at what

10 was being sold and how it was being processed to

11 see if there were opportunities for people to

12 abuse the process. We had issues with a number

13 of products and particularly with some

14 promotions that we did that facilitated people

15 taking advantage.

16 **Q.** In time, across the period that we're looking

17 at, was it the case, however, that far more

18 emphasis was placed on debt recovery through the

19 civil and criminal courts, rather than

20 preventative action?

21 **A.** I don't think so. I think they were always both

22 dealt with. I think, from the perspective of my

23 team, my team was primarily focused on the

24 investigations side, with conducting

25 investigations to find out what went wrong and

39

1 **Q.** So the Executive Team could see from that, by

2 both a collection of the reports but also within

3 each report, where a trend in the investigation

4 of crime or a forecast of the investigation of

5 crime was made, the big picture?

6 **A.** Yes.

7 **Q.** Can we look, please, at this one. This one

8 states:

9 "The principle aims of the Investigation

10 Team are to stop criminal offences taking place,

11 apprehend and prosecute those who commit

12 offences against us in order to maximise our

13 recovery and reduce loss to [the Post Office]

14 and its clients through the identification of

15 areas of weakness throughout the business both

16 operationally and within our product offerings."

17 Was that a standard sort of template at the

18 top of each report?

19 **A.** I think that is at the head of every one, yes.

20 **Q.** Was the role of the Investigation Team,

21 therefore, preventative in nature?

22 **A.** It was combined preventative and investigative.

23 **Q.** How did the preventative element of the

24 Investigation Team manifest itself in practice?

25 **A.** So we would look at procedures and identify

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1 who perpetrated it, if there was a crime. But

2 as part of that, we would also feed back to the

3 business any weaknesses that we observed that

4 needed to be addressed.

5 **Q.** Can we look at the headlines, if we scroll down,

6 please, at 1.0, and in this report you give them

7 an executive summary at the beginning; is that

8 right?

9 **A.** That's right, yes.

10 **Q.** "1. Major process weaknesses identified in

11 respect of Postal Order Cashback offer for Home

12 Insurance", et cetera.

13 **A.** Yes.

14 **Q.** "Investigations raised into two frauds against

15 IASA ..."

16 **A.** I haven't got a clue what that is.

17 **Q.** No.

18 "3. Internal Contact Centre fraud at EDS

19 Preston ..."

20 **A.** Yes.

21 **Q.** "The Travel Card Product is still causing

22 concerns ..."

23 **A.** Yes.

24 **Q.** "5. Rugeley Case finalised and postmaster

25 pleaded guilty ..."

40

1 A. That's Rugeley.
 2 Q. Rugeley, my mistake:
 3 "6. Identity Fraud issues continue to be
 4 raised and Police and the [Serious and Organised
 5 Crime Agency] are showing interest in both check
 6 and send and redirection frauds being
 7 perpetrated at Post Office branches."
 8 So is the idea of this a means of
 9 communicating the headlines to your Executive
 10 Team?
 11 A. Yes.
 12 Q. Can we look, please, at page 2, please, and
 13 scroll down to the foot of the page. I'm going
 14 to skip over the details that we've just seen
 15 summarised in your executive summary to the
 16 Executive, and look at paragraph 2.0,
 17 "Investigation Operations". This seems to be in
 18 grey shaded or bold. Is that because it was
 19 important or just to differentiate it from the
 20 rest?
 21 A. I think it was just to explain that that was the
 22 header.
 23 Q. I meant that you can see that the whole box is
 24 grey shaded?
 25 A. Oh, I think that's because we did -- this is
 41

1 can be added. There has been and will continue
 2 to be a fall in prosecutions achieved and this
 3 will eventually impact on recovery figures.
 4 "A review of the criteria used to instigate
 5 enquiries is about to commence and this will see
 6 a reduction in the number of cases raised to
 7 investigation status."
 8 Is that a cross-reference to the upping of
 9 the trigger.
 10 A. This goes back -- it does, and the first part of
 11 it reflects on the drive that we had to reduce
 12 caseloads. I think, when I took over, there
 13 were something like 600 cases ongoing and a lot
 14 of them were old and stale and weren't going
 15 anywhere. So the first thing we did was close
 16 them down, the ones that weren't going to go
 17 anywhere, in order that we had more manageable
 18 workloads across the team.
 19 Q. "New [key performance indicators] are also
 20 currently being developed that will show how the
 21 team continues to add real value to Post Office
 22 Limited."
 23 So, overall, the Executive, is this right,
 24 would know, month on month, how much money had
 25 been recovered by, or by the work of, the
 43

1 like a period update, so it's -- we did this
 2 every month so they could see it and it just
 3 means that this is the bit -- this is our
 4 performance on a monthly basis. The rest of it
 5 was: these are the items that need to be read.
 6 Q. I see.
 7 "This month's recovery figure is £63,000.
 8 Period 9 case raise figures for deficiencies at
 9 our alone were £140,000.
 10 "In total, 31 new investigation cases were
 11 raised during the period, with a current loss
 12 value of £245,000.
 13 "At present the team is dealing with 248
 14 ongoing investigations with a loss value in
 15 excess of [£9 million] of these, 80 are
 16 currently going through the courts.
 17 "Post Office OD caseloads ..."
 18 What's Post Office OD?
 19 A. Err ... I really don't know. I can't remember.
 20 Q. In any event:
 21 "[They] have been managed down ..."
 22 A. Yes.
 23 Q. "... and are now at a sustainable level ... the
 24 team continues to work at capacity and some
 25 enquiries are inevitably lapsed before any value
 42

1 Investigation Team.
 2 A. Yes.
 3 Q. That amount is identified as deficient at audit
 4 as well, yes?
 5 A. Yes. So the figure that we produced there is
 6 across all investigation cases and, at this
 7 time, audit shortages would probably be coming
 8 more regular, but it would include all of the
 9 other fraud type cases that we had, and because
 10 of the length of time it takes to get into
 11 prosecution and then do recoveries, some of that
 12 money would still be from pension cases.
 13 Q. As you've told us already, you could apply
 14 levers to decide how many investigations would
 15 be commenced?
 16 A. We would. We wouldn't be doing that on
 17 a monthly basis. That would be probably
 18 a yearly review.
 19 Q. Would the Executive have to sign off that change
 20 in trigger points?
 21 A. I'm not sure the Executive would. When we did
 22 it, I told Rod Ismay -- I think Rod Ismay and
 23 Peter Corbett were aware what we were doing and
 24 agreed. I mean, ultimately, it doesn't really
 25 matter if they sign it off or they don't,
 44

1 because you get a choice of you do a fewer
2 number of cases but do them well, or you have
3 a vast number of cases and they sit on the books
4 because no one gets to deal with them.

5 **Q.** So would you agree that, through this kind of
6 reporting, there was a formal and established
7 mechanism for the communication of information
8 as to the work of the Investigation Department
9 to the Executive?

10 **A.** Yes.

11 **Q.** Did you ever attend any meetings with the
12 Executive or any of the other people, the
13 collection of people to whom this was addressed,
14 to speak to these reports?

15 **A.** No.

16 **Q.** So what formally came back, then? You were
17 firing this stuff in, which we can see is, in
18 part, to justify the team. It says "These KPIs
19 will show how the team continues to add real
20 value to Post Office Limited". So it's
21 important to put a marker down, presumably, as
22 to the continuing value and therefore existence
23 of the team?

24 **A.** Yes, I think that's -- one of the primary
25 reasons for us, from our side, doing it, was to

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1 Criminal Law Team no longer reported to the head
2 of Legal Services but, instead, reported to the
3 Head of Security and Operations. Do you
4 remember that?

5 **A.** I think that when the Head of Criminal Law
6 stopped reporting to the head of Legal Services,
7 he actually reported to Andrew Wilson, so that's
8 not Security and Operations that's the Corporate
9 Security Director. I think that's what
10 happened. I don't know.

11 **Q.** So you think that evidence we've heard might be
12 wrong?

13 **A.** Possibly, yes.

14 **Q.** If it's the case that Criminal Law reported to
15 Head of Security, would you see a problem or
16 a conflict arising there?

17 **A.** I don't know. I can see that some people might
18 look at it and say "So the business is now
19 controlling the lawyer", but I don't think it
20 worked that way. The Criminal Law Team were
21 still seen as the independent legal experts.
22 Andrew Wilson wouldn't -- and I know him, he
23 wouldn't have dreamed of telling Rob Wilson how
24 to manage a legal case. I think it was more of
25 an accommodation rather than to take control.

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1 let them know that we weren't just people that
2 sat in dark rooms and didn't do anything. But
3 what came back was Alan Cook thanked me, Dave
4 Miller, when I saw him, said, "I've seen your
5 report, it's good". Occasionally, a particular
6 subject would come back from somebody. I know,
7 in the case of the Travel Money Card, there was
8 quite a disagreement between me and the
9 Commercial Team about the Travel Money Card and
10 how it was run, and that later came back via
11 John Scott as well, but, yeah, it was --
12 basically, we were telling them what we were
13 doing and, by and large, they said, "Thanks very
14 much".

15 **Q.** So nothing of substance came back; is that fair?

16 **A.** Only if there was an issue in relation to
17 a particular product and somebody came and asked
18 questions about "Why are you saying this?" and
19 then we would give our view as to why we were
20 saying it and what should be done about it.

21 **Q.** Thank you. That document can come down.

22 We've heard some evidence from a lady called
23 Teresa Williamson that, after she left the
24 Criminal Law Team in 2003, there was
25 a restructuring of reporting lines, so that the

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1 **Q.** What do you mean an "accommodation"?

2 **A.** So the Legal Services -- the Criminal Law Team
3 needed to report somewhere and, I think at the
4 time, somebody in some project somewhere
5 probably decided that, if they're dealing with
6 criminal law, why don't we stick them with the
7 Security Manager? But I don't know and I'm
8 speculating.

9 **Q.** The monthly reports that we've seen, if systemic
10 problems or repeated problems with Horizon had
11 existed, of which the Investigation Department
12 became aware, that would be an appropriate
13 medium, an ideal medium to communicate those
14 problems to the Executive Team, wouldn't it?

15 **A.** Oh yes, if we'd seen a large number of cases,
16 where doubt was being cast upon Horizon then it
17 would probably have gone into that report quite
18 quickly.

19 **Q.** Can you remember that ever occurring?

20 **A.** Not while I was ever in charge, no.

21 **Q.** Just to be clear on that, you don't remember
22 that occurring because systemic or repeated
23 problems with Horizon were not brought to your
24 attention and that's why they weren't included
25 within the report?

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1 A. Yeah, we -- all the time I worked in
 2 investigations, there was no indication to us
 3 that there was any sort of systemic problem with
 4 the Horizon system.
 5 Q. Was that the position right up until your
 6 function changed in early 2007?
 7 A. Yes, I believe so. We had obviously cases where
 8 people said there were problems with Horizon.
 9 From my recollection, they were very few and,
 10 usually, the evidence that we had suggested that
 11 Horizon wasn't the problem.
 12 Q. You tell us in your witness statement,
 13 paragraph 8, that, in your operational
 14 investigation roles, you would be responsible
 15 for providing a disciplinary report relating to
 16 the cases that you investigated, where a suspect
 17 was identified, investigated, and for ensuring
 18 that these were completed, where required, by
 19 Investigators under your direct supervision,
 20 yes?
 21 A. Yes.
 22 Q. Was that, when you were looking at cases
 23 investigated under your supervision, the report,
 24 your principal window into what had gone on in
 25 the case?

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1 files.
 2 Q. In your witness statement, you refer to your
 3 involvement in a case against Mr Thomas, Hughie
 4 Thomas?
 5 A. Yes.
 6 Q. That's paragraph 47 and 48 of your witness
 7 statement. I just want to look at some
 8 documents arising from that. FUJ00155181. Can
 9 you help us, please, with what this document is,
 10 if we just pan out a little bit, please. Do you
 11 recognise the nature of the document?
 12 A. I'm not sure exactly because I didn't do these
 13 documents, but it looks to me like he's --
 14 Graham's asking somebody to do some analysis on
 15 some call logs in relation to, I'm presuming,
 16 Mr Thomas and an allegation that there's a fault
 17 with nil transactions on card account, I think.
 18 Q. So, first of all, who was Graham Ward?
 19 A. Graham Ward was the Casework Manager in the
 20 Investigation Team.
 21 Q. So was he managed by you?
 22 A. Yes.
 23 Q. How many people did he manage?
 24 A. Five, I think.
 25 Q. For the entirety of the period that we're

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1 A. No, I think the suspect offender report would be
 2 the one. So when they conducted a case, and
 3 it's hard to -- because I know something
 4 changed, but when I was an Investigator we used
 5 to write two reports. We'd have a suspect
 6 offender report, which went in the case file and
 7 there would be a discipline report that went to
 8 the Discipline Manager within the business.
 9 And when I was the prosecution authority,
 10 I would be reading the case file report not the
 11 discipline report, so I'd be reading the full
 12 report that had everything in it.
 13 Q. You refer there to the case file report, is that
 14 the same report as a suspect offender or
 15 offender report?
 16 A. Yes, because that's -- the case file was, like,
 17 the core document in an investigation and the
 18 case file came first into the Casework Team and
 19 then the case -- the physical case file would go
 20 to Legal Services. Their advice would be
 21 inserted into the case file then it would come
 22 back to me for prosecution authority.
 23 I think, later on, they started doing things
 24 electronically but, I think, when I was there,
 25 it was -- we were still passing electronic case

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1 looking at, were you Graham Ward's manager?
 2 A. No. We had a lot of reorganisations and
 3 I changed roles a few times. Graham started to
 4 work for me, I believe, when I took over as
 5 National Investigation Manager. So, prior to
 6 that, the Casework Manager, who I believe then
 7 was Brian Sharkey, would have reported to Phil
 8 Gerrish. But we did a reorganisation soon after
 9 I took over, and Graham became the Casework
 10 Manager.
 11 Q. In any event, for this audit record query, ARQ,
 12 Mr Ward has asked, in Mr Thomas's case:
 13 "Please conduct an analysis of all Helpdesk
 14 calls for the above period."
 15 A. Yes.
 16 Q. The period is 14 September 2005 until 13 October
 17 2005.
 18 A. Yes.
 19 Q. "Also please conduct a thorough examination of
 20 the system in general with a view to refuting
 21 the postmaster's allegation that there is
 22 a fault with the 'nil' transactions on card
 23 account/online banking transactions.
 24 "Please bear in mind we are investigating
 25 a substantial shortage in the accounts and

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1 should this proceed to prosecution we may be
 2 asking for a supporting witness statement."
 3 So this ARQ request, as I'm going to call
 4 it, were you familiar with these?
 5 **A.** I knew they happened. I wouldn't say I was
 6 familiar with how it worked, but I knew they
 7 happened and I knew they a requirement where we
 8 needed data for Horizon.
 9 **Q.** The request was "conduct a thorough examination
 10 of the system with a view to refuting the
 11 postmaster's allegation there's a fault".
 12 **A.** Yes.
 13 **Q.** Would you see requests like this?
 14 **A.** No.
 15 **Q.** Presumably, if you were writing it you would
 16 write it in a more open way?
 17 **A.** That doesn't look very scientific, does it?
 18 **Q.** Well, it looks loaded, doesn't it?
 19 **A.** Definitely.
 20 **Q.** Is that reflective of an attitude of mind that
 21 was common amongst Investigators at the time: we
 22 need to disprove what a postmaster is saying to
 23 us, rather than openly to investigate the
 24 accuracy of reliability of what a postmaster is
 25 saying to us?

1 was possibly 29 days, or maybe a bit longer,
 2 after branch trading was introduced, that we
 3 could produce all the transactions direct from
 4 the terminal in the office. So rather than us
 5 have to rely on ARQ, which was a limited
 6 resource, we would print all the reports we
 7 could from the Horizon terminal in the office so
 8 that they could be analysed manually to see if
 9 there was anything in there that pointed
 10 a solution to why the loss occurred.
 11 There would also be any paper documentation.
 12 There were occasions where people would have
 13 an envelope or a bag somewhere that -- where
 14 they were putting money, so we would not
 15 necessarily always take it but make a note that
 16 it was there so that we could establish what the
 17 purpose of it was later on. If there were -- if
 18 we went into an office and the Investigators,
 19 when they searched the office, found
 20 documentation that had been suppressed then that
 21 documentation would have been seized.
 22 So anything that was in there. It all
 23 depended on what the case was because audit
 24 shortages, on the face of it, all looked the
 25 same but when you get to the office they might

1 **A.** It looks like that on paper but I don't think
 2 that was the mental state of us in the
 3 investigations. I think it's probably poorly
 4 worded but it's not -- I don't think that
 5 reflects where we were as a team.
 6 **Q.** Okay, that can come down. Thank you.
 7 You tell us in your witness statement --
 8 it's paragraphs 20, 21 and 22 -- of the
 9 involvement of Investigators following the
 10 identification of shortages at audits. And you
 11 tell us in paragraph 22, again no need for this
 12 to be turned up:
 13 "An investigator would take steps to secure
 14 all necessary documentation and other evidence
 15 at the branch. They would then gather any
 16 further evidence they required, interview
 17 suspects and witnesses and analyse the
 18 documentation and reports from Horizon in order
 19 to establish the cause of the loss."
 20 What does "all the necessary documentation
 21 and evidence" mean?
 22 **A.** It would depend on the case but they would --
 23 within the office, the Audit Team would be asked
 24 to produce all the reports Horizon had for the
 25 branch. The way Horizon worked is I think it

1 be very different.
 2 **Q.** In audit shortage cases, as you've described
 3 them -- and by an audit shortage case you mean
 4 where an auditor or auditors have attended,
 5 they've conducted a stocktake and there's
 6 a material difference between what the system
 7 records as being present or should be present --
 8 **A.** Yes.
 9 **Q.** -- in the branch, by way of cash and stock, and
 10 that which is actually present in the branch by
 11 way of cash and stock -- in what circumstances
 12 would Investigators identify whether further
 13 evidence from the Post Office or Fujitsu was
 14 required about Horizon?
 15 **A.** Again, it would depend on the case. If there
 16 were -- if the subpostmaster or counter clerk
 17 had given an indication of when a loss actually
 18 happened, I would expect to look at the Horizon
 19 data for that period to see if there's anything
 20 in there that would facilitate the loss. It
 21 would all depend on the case and the nature of
 22 how the loss occurred, if we could establish
 23 that, and whether the Horizon data was going to
 24 give us an inkling.
 25 **Q.** Was, throughout the period of your tenure,

1 an assumption made that the data produced by
 2 Horizon was reliable and robust?
 3 **A.** Yes.
 4 **Q.** Given that assumption or that belief, would that
 5 have had an effect on the assessment of when and
 6 in what circumstances it was necessary to obtain
 7 ARQ data?
 8 **A.** I expect so. I don't know. I would imagine
 9 that, if there was something that had been
 10 indicated to us that suggested that we should
 11 look at Horizon, we would look at Horizon.
 12 I think, because we worked in a world where
 13 Horizon was 100 per cent infallible, then we
 14 would work on the basis that the loss didn't --
 15 wasn't -- didn't occur because of Horizon. So
 16 you're not going to see anything in Horizon, if
 17 Horizon hasn't done anything.
 18 **Q.** So putting it another way: you didn't think you
 19 needed to prove the reliability of Horizon by
 20 obtaining underlying data; you took the figures
 21 produced by Horizon as being accurate and
 22 reliable?
 23 **A.** Yes.
 24 **Q.** Was that a common mindset, so far as you recall,
 25 amongst your Investigators?

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1 an investigation, if the investigator asked for
 2 it, they'd have got it.
 3 **Q.** You told us earlier that it came at a cost.
 4 **A.** Oh, yes.
 5 **Q.** Was cost irrelevant, then?
 6 **A.** To me it was irrelevant. The way we managed it
 7 is if we had gone over our numbers for a month,
 8 we would delay requests until the following
 9 month. I know we had discussions in the
 10 business. I know we had some quite forthright
 11 discussions on occasion on the basis that, if we
 12 haven't got the evidence, we can't conduct
 13 an inquiry or a prosecution.
 14 **Q.** Forthright discussions with whom or amongst
 15 whom?
 16 **A.** So I had some discussions -- I think there are
 17 some documents in here -- with the person that
 18 managed the Fujitsu account, to say that we've
 19 got a job to do and having Fujitsu say, "You
 20 can't have that because it's not in the
 21 contract", isn't the answer. And, obviously, we
 22 were pushing for the business to increase the
 23 ARQ requests that we could obtain because, with
 24 Horizon cases becoming much more prevalent,
 25 there was going to be a need for us to use data

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1 **A.** I think they all had the same mindset. I think
 2 everybody believed that Horizon was showing the
 3 right figures and, therefore, there was no need
 4 for us to go poring through every single
 5 transaction.
 6 **Q.** So, given that mindset, when and in what
 7 circumstances was ARQ data obtained?
 8 **A.** So I think the case that you've just shown me,
 9 where the postmaster has said something specific
 10 about certain transactions, then we would get
 11 the ARQ data and ask Fujitsu to explain what it
 12 was telling us.
 13 **Q.** Who was responsible for deciding whether to
 14 retrieve ARQ data or not?
 15 **A.** So the Investigator in the case would look at
 16 what they'd been told and what they'd seen and
 17 they would make the request for the ARQ data.
 18 That would come in to Casework and I think
 19 Graham -- I think it was just Graham -- would
 20 then go to Fujitsu to explain what we wanted and
 21 why.
 22 **Q.** Was there any sort of vetting or supervision
 23 over when and in what circumstances ARQ data
 24 could or could not be requested?
 25 **A.** I don't think so. I think in the case of

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1 much more.
 2 In the old days, with pension frauds and the
 3 like, Horizon data was irrelevant. We had the
 4 pension frauds -- we had the pension foils and
 5 everything else we could get back.
 6 **Q.** At what point in an investigation, so
 7 post-audit, would the retrieval of ARQ data be
 8 considered?
 9 **A.** I think it would be when the Investigator was
 10 going through the summary and writing his report
 11 and looking at what he'd been told and what he
 12 knew, and what the reports that he'd got from
 13 the office had told him. Then he'd look at
 14 whether he needed to go further.
 15 **Q.** I'm interested in particular whether it was pre
 16 or post-charge. I know charges weren't, in
 17 fact, laid but you know what I mean.
 18 **A.** I imagine that they would initially look for
 19 themselves but, once the case had gone to Legal
 20 Services and if it was going to Crown Court, to
 21 counsel, then counsel or Legal Services would
 22 say, "You need to get Fujitsu data or a Fujitsu
 23 statement to say the system's robust".
 24 **Q.** You said I would imagine they would look for
 25 themselves. Do you mean pre-charge they would

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1 obtain ARQ data?
 2 **A.** I think -- I don't know how the process worked.
 3 I don't know whether -- because of the
 4 constraints we had, I don't know whether there
 5 was any sort of limitation on not getting ARQ
 6 data until somebody had been charged. I would
 7 imagine not because, if you charged somebody,
 8 get ARQ data and find something that says you
 9 can't prosecute, then you've wasted your time
 10 going to counsel.

11 So I don't know how exactly it worked but
 12 I would imagine Investigators would consider
 13 whether they needed ARQ data before they
 14 finished their report.

15 Bear in mind that, after you've interviewed
 16 a suspect, you've got a limited time period to
 17 write your tape summaries and get your report
 18 in. So that may have been a constraint, in
 19 itself.

20 **Q.** If ARQ data was not requested in a particular
 21 case, what material would the Post Office rely
 22 on in proceedings, in order to prove a loss?

23 **A.** I really can't remember. I didn't deal with any
 24 of these cases, so I don't know how that would
 25 have worked.

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1 about when and in what circumstances a request
 2 for ARQ data would be made in an audit shortfall
 3 case. Can I just have a look at something in
 4 your witness statement, please, on that topic.
 5 So your witness statement at page 13 -- it'll
 6 come up on the screen, please.

7 Page 13 at the foot, paragraph 32, under the
 8 heading "Analysing Horizon data, requesting ARQ
 9 data from Fujitsu and relationship with
 10 Fujitsu". You say:

11 "I am asked what analysis would be
 12 undertaken of Horizon data by investigators when
 13 a shortfall was claimed to have been caused by
 14 Horizon. I have no recollection of what
 15 analysis would be undertaken, as this would
 16 depend on the individual case. The cases
 17 I dealt with were predominantly about
 18 suppressing of transactions or fraudulent
 19 transactions such as double counting or
 20 encashing stolen benefit books. In these cases
 21 we would want to have evidence of what
 22 transactions took place, when they took place
 23 and who undertook them. We would match these up
 24 with the associated documentation to show that
 25 the system had been used fraudulently."

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1 **Q.** I mean, before Horizon came in, there were paper
 2 records generated by the branch?

3 **A.** Yes, and after Horizon came in, there were paper
 4 records generated by the branch using the
 5 Horizon system. But if Horizon's working
 6 perfectly, getting Horizon data isn't going to
 7 change the report. So I think the Investigators
 8 would assume, if Horizon is working fine and the
 9 reports are the reports, it's no different to
 10 having a manual report that the subpostmaster's
 11 prepared.

12 **MR BEER:** Thank you very much, Mr Utting.

13 Sir, I wonder whether we might take our
 14 morning break?

15 **SIR WYN WILLIAMS:** Yes, by all means.

16 **MR BEER:** Come back at 11.35, please.

17 **SIR WYN WILLIAMS:** Very well see you then.

18 **MR BEER:** Thank you very much.

19 (11.17 am)

(A short break)

20 (11.35 am)

21 **MR BEER:** Good morning, sir, can you continue to see
 22 and hear me?

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

24 **MR BEER:** Thank you, Mr Utting, we were just talking

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1 Then this:

2 "In an audit shortage case, I am not sure
 3 what Horizon would be able to tell us. Though
 4 it has been a long time since I looked at one."

5 The sentence there "In an audit shortage
 6 case I am not sure what Horizon would be able to
 7 tell us", are you saying by that, "I'm unclear
 8 what Horizon would be able to tell us, I just
 9 don't remember now", or are you saying, "I do
 10 not think that Horizon would be able to tell us
 11 much"?

12 **A.** I think it's a bit of both. I mean, it's a long
 13 time since I conducted an investigation into
 14 an audit shortage and I'm not sure I ever did
 15 one in relation to Horizon. But as I said in
 16 the bit before, it would all depend on the case
 17 and what the person had said at interview about
 18 how the loss had occurred.

19 **Q.** If the person said in interview, and we've got
 20 quite a lot of interviews where people have said
 21 this, "I know I didn't steal the money and
 22 I don't believe my staff did because I believed
 23 them to be people of honesty and integrity,
 24 they've worked for me for decades", or whatever,
 25 "but unexplained losses and discrepancies arose

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1 on Horizon, which I noticed at the time and
2 I reported to the Helpdesk or NBSC or both",
3 what is your understanding of what Horizon data
4 would be able to tell you as to the truth or
5 accuracy of what they were saying?

6 **A.** I think you have to remember we were living in
7 a world where we were told and believed that
8 there was no problem with Horizon. So unless
9 there was a transaction that could be pinpointed
10 that caused the loss, and we were told that
11 Horizon didn't generate such transactions, you
12 weren't going to get to the bottom of that.

13 So I don't know -- I don't have -- I've got
14 quite a good memory but this was 17 years ago.
15 I don't know what I would have looked at or what
16 an Investigator would have looked at. But
17 unless, like in the case of I think it was
18 Hughie Thomas, where he actually said "zero
19 transactions in relation to card account", we
20 would be looking for a needle in a haystack that
21 wasn't there. So I don't --

22 **Q.** Or a needle in a haystack that, it turns out,
23 was there?

24 **A.** Potentially, yes. I don't know.

25 **Q.** Can we look at some examples of how this
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1 further evidence that may assist with future
2 enquiries. On his arrival Steve was greeted by
3 Graham Summers, Retail Line Manager, who
4 explained that he had been aware of the
5 deficiency for some time and that he considered
6 it to be a Horizon system problem.
7 "Steve obtained transaction history logs
8 with the assistance of auditors and these have
9 now been retained for examination and comparison
10 with Fujitsu Horizon system data.

11 "Steve contacted me and explained that the
12 total deficiency was as a result of
13 an accumulation of large losses that had been
14 declared and rolled in the office cash accounts
15 since as far as back as week 47 ...

16 "The losses had been dramatically increased
17 ..."

18 Then if we go to page 4, please, and pan out
19 please. In relation to the heading
20 "28 September", Mr Hall narrates what happened
21 when the subpostmaster and his wife attended at
22 the office, where they were arrested and taken
23 into custody. If we scroll to the second
24 paragraph from the bottom, Mr Hall tells us:

25 "Neither [that's Mr and Mrs Prosser] had any
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1 unfolded in practice. Can we start by looking
2 at POL00110269. Can you see that this is
3 a report that was prepared by Geoff Hall,
4 an Investigation Team Manager for West, for you,
5 and it's an interim report, as at 14 October
6 2004 about the Blackwood office in Gwent, yes?

7 **A.** Yes.

8 **Q.** He says:

9 "Thursday, 23 September 2004.

10 "At about 10.00 am I received a telephone
11 call ... asking me if I was aware of large
12 losses being incurred at Blackwood [office]
13 I explained ... my team were not involved in any
14 enquiries ... Cris proceeded to inform me that
15 an audit conducted at the office that morning
16 had confirmed a shortage of £435,984.12."

17 If we scroll down, please:

18 "On preparing the final account ... the
19 initial discrepancy was disturbed and reduced,
20 resulting in a final figure of £435,293.44 ..."

21 He says:

22 "I immediately contacted Steve George,
23 Investigation Manager, and dispatched him to the
24 office to assist with the retention of
25 transaction logs from the Horizon system and any
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1 suspicions of staff under their employ both
2 claiming to trust them all implicitly and when
3 asked for an explanation as to how these losses
4 had occurred both were adamant that their staff
5 were honest and the Horizon system was to blame.
6 They claimed that there had been problems since
7 the Bureau was migrated from the Forde
8 Moneychanger to Horizon in February 2004. There
9 was also mention of flashing lights on the
10 keyboards whilst the terminals were not being
11 used by staff, almost as if transactions were
12 being ghosted. They were unable to explain any
13 of the discrepancies and confirmed they were not
14 in a position to repay the outstanding monies."

15 Then if we go forward to page 9, please. He
16 concludes his report to you by saying:

17 "No evidence at present to suggest theft by
18 postmaster or staff. Losses in my opinion have
19 undoubtedly been facilitated by the lack of
20 procedural security within the office and
21 failure to secure interconnecting door with
22 Royal Mail."

23 If there was no evidence of theft and
24 allegations, as we've seen, by the subpostmaster
25 of problems with Horizon, what should have been
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1 done to investigate those?
 2 **A.** So we -- I think, from the investigation
 3 perspective, my team was there to investigate
 4 criminal offences and, if there was no criminal
 5 offence, effectively it wasn't our role to
 6 investigate the Horizon system. Our role was to
 7 investigate potential criminal offences. What
 8 should have happened, looking back, is that
 9 somebody -- and I note that I think it was the
 10 terminals in the office and their personal
 11 computer were mirrored -- somebody should have
 12 looked through that to see if there was anything
 13 in the system that would facilitate the loss.

14 But I think that would probably be something
 15 that, if we weren't going to be involved because
 16 there was no criminality or evidence of
 17 criminality, the business should then have been
 18 going to Fujitsu to say, "You need to pore over
 19 this and look at what's transpired". I don't
 20 think my team would have had the necessary
 21 skills or experience to analyse an IT system.

22 **Q.** Does it follow from those answers that, once the
 23 conclusion had been reached that there was no
 24 crime or no sufficient evidence of crime to
 25 progress the matter, that was the end of the

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1 Sunday -- that I think they pursued the
 2 postmaster civilly for the loss, or something
 3 went on. So whoever was going to take on the
 4 baton of dealing with the loss should have been
 5 instigating an investigation to understand what
 6 the postmaster was saying and whether there was
 7 anything in there.

8 I would have -- it's easy now because we all
 9 know what's gone on, but this was an opportunity
 10 for the business to do a proper root and branch
 11 review of -- if the loss is this big, and this
 12 is nearly £500,000, then in my head -- and I'm
 13 not an expert -- it justifies spending some
 14 money to get some proper experienced intelligent
 15 view, looking at the system.

16 **Q.** Did there ever come a time when there was such
 17 a collection of cases or collection of
 18 allegations about problems with Horizon that
 19 that kind of root and branch review was done?

20 **A.** Not while I was there. When I was there, there
 21 were relatively few cases and we had
 22 discussions. I was involved in some other
 23 cases, I'm sure we'll discuss them, whereby
 24 there were allegations against the system. But
 25 we were living in a world with 57,000 counter

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1 matter, so far as the Investigation Team were
 2 concerned?

3 **A.** I can't remember, because it was a long time
 4 ago. I think the problems with the case -- and
 5 I think I was actually involved interviewing one
 6 of the Senior Managers here -- was that, if
 7 you're going to pursue anybody for theft, then
 8 you can't do that if you knew what they were
 9 doing, and the people in Post Office Limited
 10 knew these losses were occurring and
 11 accumulating, not in my team, but in the
 12 business and, if the business knew these losses
 13 were occurring, and were letting the postmaster
 14 increase them week in, week in, and albeit
 15 hiding them in the system, then that's not
 16 dishonest, because they were telling the
 17 business what they were doing and, therefore,
 18 you wouldn't be able to prove theft anyway.

19 **Q.** Who, within the Post Office, should have taken
 20 up the baton after that last sentence had been
 21 written, nonetheless, to investigate what the
 22 subpostmaster was saying about Horizon?

23 **A.** I think -- and I'm not an expert here, I don't
 24 know where it went. I've seen a document --
 25 I think I was given a document Wednesday or

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1 positions and 11,000 or 14,000 branches, and
 2 there were probably less than ten cases where
 3 postmasters were making allegations at this
 4 time.

5 So we would have asked the question "Is
 6 there a problem?" and we were getting the answer
 7 back "There is no problem, this is just people
 8 making allegations".

9 **Q.** Can I turn, then, to some of that account and
 10 begin by looking at POL00107426. This is
 11 an email exchange from November 2005. Can we
 12 start, please, at page 5. Just scroll down.

13 Can you see this is signed off by
 14 "Litigation Team Leader, Company Secretary's
 15 Office, Legal Services"?

16 **A.** Yes.

17 **Q.** It's a Mandy Talbot email. If we go back to
 18 page 3, please. Can we see the beginning of the
 19 email there from Mandy Talbot, and it's
 20 23 November 2005 to, amongst others, you?

21 **A.** Yes.

22 **Q.** Can you help us, looking at that cast list on
 23 the distribution and the copy list, what that
 24 collection of people represents?

25 **A.** Dave Smith, I think, was in charge of IT at the

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1 time, I think. Jennifer Robson, not sure.
 2 I think she might have been in the Legal team
 3 but I'm not sure. Me. Rod Ismay was my boss,
 4 he was in charge of Product and Branch
 5 Accounting. I'm not sure if he was, at that
 6 stage, but he was involved with the finance side
 7 of the business. I think Clare Wardle was
 8 a solicitor. Nicky Sherrott, I don't recall,
 9 and Mandy was a Civil Litigation lawyer.
 10 **Q.** You can see the title "Challenge to Horizon"?

11 **A.** Yeah.

12 **Q.** This email, essentially, summarises two cases,
 13 the *Castleton* case and the *Bajaj* case. In
 14 relation to the *Castleton* case, you see it says,
 15 "Summary of Facts" and in paragraph 1 there's
 16 a high-level summary:

17 "Proceedings have been issued by [the Post
 18 Office] against Lee Castleton ... for £27,000.
 19 It was known by the business prior to issue that
 20 [Lee Castleton] blamed Horizon for the losses.
 21 External solicitors were asked to check with the
 22 Fujitsu liaison team and to assure themselves
 23 that the evidence in respect of Horizon was
 24 sound before the issue of proceedings. There
 25 had been no security investigation so the data

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1 giving a warning about the collection of data
 2 concerning the reliability of Horizon and the
 3 potential for the compromise of future
 4 proceedings and compromise the reliance on
 5 Horizon itself, yes?

6 **A.** Yes.

7 **Q.** There was a reference -- we skipped over it, I'm
 8 not going to go back to it -- to there being
 9 a meeting between Tony, Rod and David and
 10 external solicitors being arranged to discuss
 11 the best way forwards.

12 Did you attend any meeting with Rod Ismay,
 13 David X Smith -- the IT David Smith -- and
 14 external solicitors, with or without Ms Talbot,
 15 to discuss the way forwards in relation to the
 16 issues that she's identified?

17 **A.** I don't recall but I may well have done. I did
 18 attend meetings with Dave Smith and, obviously,
 19 Rod Ismay was my boss so I'd spent a lot of time
 20 with Rod but I don't recall any specific
 21 meetings, but that doesn't mean I didn't go to
 22 one.

23 **Q.** Can I turn to a meeting that took place a couple
 24 of weeks after this but not with external
 25 solicitors, and that's by looking at

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1 had not been requested from Fujitsu."

2 Then if we go forward to page 5, please.

3 Following the summary -- and I'm not going to
 4 read out the summary, we've looked at it
 5 before -- she says, under "Issues":

6 "In each case [that's both the *Castleton*
 7 case and *Bajaj* case] the postmasters are
 8 challenging the validity of data provided by the
 9 Horizon system and the cases became litigious
 10 before that evidence could be properly
 11 investigated.

12 "In each case it was known that Horizon was
 13 going to be challenged but there was no
 14 procedure in place to

15 "(a) acquire the necessary data

16 "(b) identify somebody with the relevant
 17 knowledge and capacity to interpret the data and
 18 report on the same.

19 "If the challenge is not met the ability of
 20 [the Post Office] to rely on Horizon for data
 21 will be compromised and the future prosperity of
 22 the network compromised.

23 "Fujitsu's reputation will be affected."

24 So this is Mrs Talbot briefing some
 25 relatively senior staff at the Post Office,

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1 POL00142539.

2 Now, this is a relatively new series of
 3 documents for the Inquiry, which may be
 4 significant, given the date of these meetings.
 5 We're going to look at the agenda first and then
 6 the minutes of the meeting. For the Inquiry,
 7 this is relatively early in the piece, because
 8 it's November and December 2005. Can you see
 9 the agenda for a meeting of the 6 December 2005?

10 **A.** Yes, I can.

11 **Q.** It's in the Juniper Room at Coton House in
 12 Rugby. What was that --

13 **A.** Coton House was the management training centre
 14 for the Post Office -- well, all of Royal Mail.
 15 Juniper Room --

16 **Q.** The room doesn't matter --

17 **A.** It's just the name of one of the rooms.

18 **Q.** Coton House in Rugby, that's not where these
 19 people worked, is it?

20 **A.** No, Coton House was a management training centre
 21 but there were meeting rooms there. We used to
 22 hold a yearly get together of the whole
 23 Investigation Team and we usually did it there
 24 because, as a training centre it also had
 25 an accommodation block.

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1 Q. So how significant an event would it be to pull
2 this collection of people together at the
3 training centre in Rugby?
4 A. Well, the training centre had meeting rooms, so
5 anyone could use it. We had quite diverse teams
6 across the country, so Rugby is a reasonably
7 central point, so people would join up there.
8 Some of these guys worked in Chesterfield and
9 others worked in London. So Rugby was
10 probably -- it's right next to the M6, so
11 it's --
12 Q. I shouldn't read anything into the fact that --
13 A. It's not a massive -- we've sold it now. It's
14 not a massively important building.
15 Q. Just looking at page 3 of this note, we can see
16 the agenda, 10.00:
17 "Introduction
18 "Required Outputs: Shared understanding of
19 the meeting objectives ...
20 "Common understanding [under 2] of who
21 currently does what ...
22 "Lessons learnt; process gaps [under 3] and
23 problems logged on flip charts."
24 So if we scroll down, lunch between 12.00
25 and 12.45, and then if we carry on over the

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1 as well, I believe. Obviously, Mandy Talbot.
2 Graham Ward worked for me.
3 Q. So do you think you asked Mr Ward to attend
4 this?
5 A. Quite possibly. Either myself or Rod would have
6 asked me who was the best person and, as Graham
7 was the Casework Manager who managed the ARQ
8 requests, he was probably the most skilled
9 person to be there.
10 Q. We've seen the email at the end of November with
11 for the proposal for a meeting being arranged,
12 that said with external solicitors. Looking
13 back, do you think this might be the meeting
14 that was, in fact, arranged?
15 A. It may well have been. It may well have been
16 an initial discussion to find out what the
17 issues were and what could be done before they
18 instigated discussions with externals.
19 Q. So we've got a range of teams represented from
20 across the business here?
21 A. Yes.
22 Q. If we scroll down, the heading is "Horizon
23 Integrity":
24 "Background:
25 "There have been several recent cases where

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1 page, finish at 2.45. So a reasonably
2 substantial meeting.
3 Back to page 1, please, and if we look at
4 the list of proposed attendees, does that
5 include some relatively senior people from
6 within the business?
7 A. I don't know the relevant seniority of all of
8 those people. They were probably more of
9 a working group subordinate to a more senior
10 group but I don't know --
11 Q. Did you have any dealings with, do you remember,
12 Keith Baines?
13 A. He was -- I did have dealings with Keith Baines.
14 He was the person I usually spoke to if -- when
15 we got into heated discussions about ARQ
16 requests and the amount of data we were allowed
17 to get from Horizon. Keith, I think, managed
18 the contract with them and he was bounded (*sic*)
19 by the contact, which wasn't always helpful.
20 I think Marie worked for Rod Ismay. I think
21 Mike Gallagher probably worked for John Smith.
22 Dave Hulbert, I can't remember who he worked
23 for. He may have been Dave Smith as well. John
24 Legg was part of the Network Services Team.
25 Jennifer Robson would have worked for Rod Ismay

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1 subpostmasters have cited errors in the Horizon
2 system as explanations for discrepancies in
3 their accounts -- either as part of a challenge
4 against termination of their contracts, or in
5 challenging the Post Office's right to recover
6 error notices/transaction corrections from their
7 remuneration.
8 "Recently, a letter was published in 'The
9 SubPostmaster' in November [apparently enclosed]
10 asking readers to send in details of incidents
11 where they believed that Horizon has caused
12 errors in their accounts. Lawyers acting on
13 behalf of a subpostmaster currently in dispute
14 with the Post Office have written stating they
15 are contemplating a joint action on behalf of
16 a number of current and former subpostmasters.
17 This would challenge the accounting integrity of
18 the Horizon system and Post Office's right to
19 make transaction corrections and recover
20 resulting debts based on Horizon data."
21 Would you agree that the way matters are
22 described there is a bit more a small number of
23 cases against 14,000 or 19,000 branches.
24 A. I don't know. I think you can read it that way
25 but, at the time, we were assured that there

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1 weren't any problems and we didn't see -- we
2 were the Criminal Investigation Team and what
3 was going on in Civil was almost invisible to
4 us. Other than cases where we were asked to
5 support, as in the *Castleton* case, we wouldn't
6 know how many cases there were.

7 It's easy to look back and say this should
8 have been a prompt to do something but, at the
9 time, with all the other things that we were
10 dealing with, I wouldn't have considered this to
11 be massively significant to me.

12 **Q.** The note continues:

13 "In one past case [Cleveleys], Post Office
14 settled out of court following an adverse report
15 on Horizon's potential to cause errors from
16 an expert appointed by the court. Fujitsu
17 advised that the report was not well founded,
18 but Post Office and Fujitsu were not able to
19 persuade the expert to change it. This report
20 was largely based on a review of Helpdesk logs,
21 since it related to events more than 18 months
22 prior to the case, and Horizon transaction data
23 was retained for 18 months only."

24 Then skipping the next paragraph:

25 "The above was discussed at a meeting called

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1 speed"?

2 "4. Who will act as the client briefing
3 external lawyers and facilitating their
4 obtaining relevant information in these cases?"

5 Then over the page at 5:

6 "What are the budget implications of the
7 above?"

8 Then there's the agenda.

9 So would you agree that there's
10 a recognition here of the fact that there was no
11 process of collating information about cases in
12 which the integrity of accounting information
13 produced by Horizon was being raised and
14 challenged and making such information available
15 to all functions across the Post Office?

16 **A.** There was -- I don't think there was. I think
17 everything we saw was piecemeal. There was no
18 coordinated ...

19 **Q.** Can we go to the minutes of the meetings
20 themselves and see what was decided. That's
21 POL00119895. We can see attendees who, in fact,
22 turned up, and I think it's per the cast list
23 that we saw on the agenda.

24 **A.** Yes.

25 **Q.** Under "Findings", if we scroll down, please:

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1 by Dave Smith on 25 November and as a result
2 urgent actions have been taken to support
3 current live cases, and this workshop was
4 organised to recommend further actions to reduce
5 this risk area in future."

6 "Meeting purpose:

7 "To review the issues and recommend ...

8 "1. Who manages dealings with
9 subpostmasters and their lawyers relating to
10 actual or potential civil cases? What processes
11 are required to identify as early as possible
12 those cases that [have] a Horizon aspect? Who
13 needs to be involved in such cases, and how will
14 they be coordinated?"

15 "2. Are any new provides required with
16 Fujitsu to obtain data, analysis, reports or
17 witness statements for civil cases?"

18 "3. Is there a need for an independent
19 expert to be appointed in advance who could on
20 request provide evidence to the court in such
21 cases? If so what exactly would be expert's
22 role be, what qualifications and qualities are
23 needed in such an expert, and how would we go
24 about appointing one? What preliminary work
25 would be required by the expert to 'get up to

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1 "1. There is no generally understood
2 process for identifying emerging cases in which
3 the integrity of accounting information produced
4 by Horizon may become an issue.

5 "2. There are a number of channels by which
6 such cases may enter Post Office ... and there
7 is no process for making information about them
8 available to all relevant functions. This
9 increases the risk that different parts of the
10 business may be dealing with the same issue and
11 not coordinate responses."

12 Would you agree that those two findings,
13 taken together, 1 and 2, present a serious risk
14 or a serious problem?

15 **A.** I think they do. I'm not sure that that's
16 entirely accurate because I don't think there
17 would ever be a criminal investigation at the
18 same time as there was a civil litigation case
19 going on. I don't think debt recovery would be
20 active whilst there was an investigation going
21 on, though -- because one would generally feed
22 the other.

23 I do agree that there was no process across
24 the business, that nobody knew how many Horizon
25 issue cases there were and, if Civil Litigation

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1 had got cases, they wouldn't tell Investigations
2 and, certainly, if the case never involved
3 an Investigator, the Debt Recovery Team wouldn't
4 have involved us.

5 **Q.** The focus on coordinating a response, as between
6 criminal and civil proceedings, is one risk,
7 isn't it, but isn't there another more important
8 and serious problem identified, namely that the
9 whole picture was not being assessed by anyone
10 within the Post Office, so that the number of
11 people raising the issue of Horizon integrity
12 was not being assessed?

13 **A.** No, it wasn't. I think, going back to what was
14 in the agenda, reading the agenda now, you can
15 see that we're still living in a world where
16 everybody thinks Horizon is fine and dandy and
17 there aren't any issues, and the agenda would
18 tend to lean towards "We know there are no
19 problems with Horizon but what do we do about
20 identifying the number of cases and dealing with
21 them?"

22 I don't think -- and we -- we've all got the
23 benefit of hindsight. I don't think that the
24 agenda was as open as maybe it could have been.

25 **Q.** I missed that last part. I don't think it --
85

1 SubPostmaster may well cause an increase; also
2 there may also be an effect from the
3 introduction of transaction corrections,
4 replacing error notices.

5 "6. The NFSP has had no involvement in
6 cases to date, and this is expected to continue
7 unless there was considerable momentum for
8 a change of policy from their membership."

9 Just pausing there, why would there be
10 an effect from the introduction of transaction
11 corrections replacing error notices in the
12 number of cases in which the integrity of
13 Horizon data was raised?

14 **A.** Off the top of my head, I don't know. My
15 understanding of transaction corrections is they
16 were error notices but they were done
17 automatically, instead of sending an error
18 notice to the branch to bring them to account.
19 So, if there was an error that could be shown to
20 be an error, then there shouldn't have been
21 an issue with a transaction correction being
22 implemented.

23 **Q.** "7. Challenges to Horizon data integrity may
24 arise late in the process; for example following
25 a suspension or issue of a late account ...
87

1 **A.** I don't think the agenda was as open as it could
2 have been.

3 **Q.** "3. The transaction logs that can be obtained
4 from Fujitsu via audit query requests [that's
5 ARQs] provide the data that is required for the
6 investigation of claimed anomalies in particular
7 cases. However, interpretation of this data is
8 not simple. It requires a considerable level of
9 understanding of branch transaction and
10 accounting processes and how these are
11 implemented on Horizon, as well as the skills to
12 analyse such data using PC-based tools."

13 So this is dealing with the need for
14 understanding and technical skill and not just
15 the provision of the raw data from ARQs.

16 **A.** I think so, yes.

17 **Q.** "4. Fujitsu's price for providing the data and
18 for skilled resource to analyse and report on it
19 is high, and the capacity provided in the
20 contract currently is fully used to support
21 investigations relating to potential criminal
22 offences.

23 "5. To date, the number of cases in which
24 the integrity of Horizon data has been an issue
25 is small; however, recent correspondence in The
86

1 "8. If all potential cases were to require
2 Horizon data to be analysed early in the
3 process, then the workload would be considerable
4 -- and much would later prove unnecessary.
5 Currently there are around 12 suspensions per
6 week, and a significant proportion of them will
7 relate to financial discrepancies. Most of
8 these are subsequently settled by agreement, or
9 are not contested.

10 "9. Where a case does go to court, it is
11 essential that Post Office is able to refute any
12 suggestion that Horizon is unreliable (in
13 general) or that it could have caused specific
14 losses to the subpostmaster bringing the case.
15 The evidence needed for these 2 points will be
16 different."

17 So that's reflecting the fact, isn't it,
18 that one might have general evidence as to the
19 reliability of Horizon versus an individualised
20 investigation in relation to the losses said to
21 have occurred in that branch and how Horizon was
22 not responsible for those losses, yes?

23 **A.** Yes.

24 **Q.** Paragraphs 10 to 13:

25 "10. For the general point, evidence will
88

1 need to be in the form of a credible expert
2 opinion that confirms that the system has been
3 designed, built and operated in accordance with
4 good practice and that its overall performance
5 provides confidence that it is operating as
6 intended.

7 "11. On the specific errors claimed to have
8 been caused in a particular case, evidence will
9 need to show (by reporting a detailed analysis
10 of the transactions, and other system log
11 entries recorded at the branch) that the system
12 recorded transactions and calculated accounts
13 accurately; and the transaction data is
14 an accurate record of what was recorded in the
15 branch at the time transactions took place ...

16 "13. Such evidence will be given greater
17 weight by a court if it is provided by an expert
18 who is distanced from the Post Office and
19 Fujitsu. Evidence will need to be given by the
20 person who carried out the analysis -- this may
21 mean in some circumstances an independent expert
22 would need to repeat analysis for himself that
23 Post Office or Fujitsu had already carried out
24 ..."

25 Then "Recommendations":

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1 recommendation for civil cases, there would have
2 been good sense in doing so in relation to
3 criminal cases?

4 **A.** Yes.

5 **Q.** That's so that the business as a whole can
6 understand the nature and extent of the
7 allegations being made?

8 **A.** Yes, but if we did it in -- and I'm not saying
9 we shouldn't have done -- if we did it in
10 investigations, I think at that time we had very
11 few. Unless everybody else was doing it, what
12 we were doing wasn't going to be that helpful.
13 But you're right, the business should have done
14 it.

15 **Q.** Quite aside from allowing the business to gain
16 a better understanding of the, at that time,
17 alleged problems with Horizon, it may have also
18 assisted in discharging disclosure obligations
19 in criminal proceedings?

20 **A.** Yes.

21 **Q.** "2. Briefing is required -- primarily for the
22 Contracts and Services Managers, but for all
23 staff dealing with subpostmasters -- setting out
24 business policy, lines to take, and how to
25 identify potential emerging cases."

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1 "1. A coordination role would be
2 established to maintain a list of all current
3 civil cases and potential civil cases where
4 accuracy of Horizon accounting information may
5 be an issue, and ensure that all relevant
6 business functions are made aware of these
7 cases."

8 So far as you are aware, was such
9 a coordination role established?

10 **A.** I don't recall. I think we -- I discussed it
11 with Rod, and with Mandy at various points, and
12 I think with Keith Baines as well. Whether it
13 actually ever came in a fruition, I can't
14 recall.

15 **Q.** Can you recall anyone ever actually holding that
16 role?

17 **A.** No.

18 **Q.** Was there ever any equivalent role established
19 in relation to criminal cases, namely somebody
20 maintaining a list -- and this is as early as
21 2005 -- of the cases in which the accuracy of
22 Horizon accounting information was called into
23 question?

24 **A.** I don't recall, sir.

25 **Q.** Would you agree that, just like this

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1 Can you remember, as a result of this time
2 period, lines to take being developed about
3 problems with Horizon?

4 **A.** I don't believe so. We were under the
5 impression and everybody who we spoke to told us
6 there was no problem with Horizon. We may have
7 suggested when we interviewed people that there
8 were no problems and that Horizon wasn't at
9 fault. I don't know, if we --

10 **Q.** So that itself was the line to take?

11 **A.** Well, it was, but I don't know if we made any
12 formal -- gave any formal instruction to
13 Investigators that that's the line they should
14 have taken. I think, when -- I don't know, when
15 I was an Investigator, I tended not to tell
16 people things because I was asking questions.

17 **Q.** You wouldn't offer your view of the position:
18 you would try and get information from them?

19 **A.** Yes, yes. My role as an Investigator,
20 I thought, was to gather evidence, not tell
21 people things. We did that when we did put the
22 case file together and did disclosure.

23 **Q.** It's not the position of an Investigator to
24 offer his or her subjective view on an issue in
25 the course of an interview, is it?

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1 A. I wouldn't. Some may, I wouldn't. When we were
 2 trained, we were trained to deal with facts and
 3 not give opinions. So, during the course of
 4 an interview, I wouldn't have been expressing
 5 opinions about things; I'd have just been asking
 6 questions.

7 Q. If we go over the page, please, to paragraph 4:
 8 "Fujitsu's price for providing the data and
 9 for skilled resource to analyse and report on it
 10 is high ..."

11 We've gone wrong somewhere, I'm looking at
 12 page 4. Thank you:

13 "4. Appointing an external expert is likely
 14 to give the best results in court. The expert
 15 will need to be able to testify both on the
 16 overall status of Horizon and related systems
 17 and on the analysis of data relating to
 18 individual cases. Such an expert may be needed
 19 for the Castleton (Marine Drive) case after
 20 7 February. Therefore discussions with Fujitsu
 21 should be initiated on the role, [terms of
 22 reference] and access to Fujitsu staff and
 23 information for such an expert [I think that
 24 should be full stop]. Advice should be obtained
 25 from Peter Corbett on the desirability of using
 93

1 know if we would have taken any actions on the
 2 basis of what was in here.

3 Q. But we've seen from Mandy Talbot's email, on
 4 which you were --

5 A. Yes.

6 Q. -- a copyee, that there were a number of cases
 7 in which the integrity of Horizon was being
 8 called into question --

9 A. Yes.

10 Q. -- by number of subpostmasters?

11 A. Yes.

12 Q. There was a meeting arranged at which
 13 representatives of different parts of the
 14 business joined together to reach a consensus as
 15 to what needed to be done --

16 A. Yes.

17 Q. -- and there's some pretty clear recommendations
 18 here --

19 A. Yes.

20 Q. -- that do not seem to be implemented in
 21 practice?

22 A. No. I think the action point we've just been
 23 looking at suggests that -- and it would
 24 probably not be one of the people in that
 25 meeting but Rod Ismay would probably be
 95

1 our external auditors to provide such an expert,
 2 even though such a person may be seen as less
 3 independent by a court."

4 So this is recommending the appointment of
 5 an expert external to Post Office and Fujitsu
 6 with discussions initiated with Fujitsu on the
 7 role that this person is going to perform.

8 A. Yes.

9 Q. Did that happen?

10 A. Not to my recollection. It may have --
 11 discussions took place, I don't know if it ever
 12 got beyond a discussion.

13 Q. Were you ever aware of an expert being appointed
 14 in criminal cases, external to Fujitsu and the
 15 Post Office on the prosecution side?

16 A. I don't recall any while I was there.

17 Q. Would these minutes have been fed back to you,
 18 by Graham Ward, essentially your deputy, at the
 19 meeting?

20 A. He may have done but he may have -- because he
 21 was working -- he was representing the
 22 Investigation Team. It was a business
 23 initiative. He probably did send me the minutes
 24 and I probably did read them but we were
 25 a contributor to this, not a leader. So I don't
 94

1 approaching Peter Corbett with regards to where
 2 to go with it. Because I worked for Rod and so
 3 did some of the more senior people in that room,
 4 and Rod was a direct report to Peter. So if
 5 anyone was going to talk to Peter it would
 6 probably have been Rod.

7 I think our role in that meeting was because
 8 we held the key to the ARQ requests and part of
 9 Graham's function would have been to preserve
 10 our ability to get data we needed for criminal
 11 cases, as well as giving advice on how to do it
 12 for other departments. I think the biggest
 13 issue was there was a contractual limit on how
 14 much data could be attained and, for reasons
 15 that I don't know, the limit also included that
 16 it needed to be for investigations and
 17 prosecutions.

18 So there was going to be -- need to be
 19 a fundamental review of what data we could get
 20 from them, in order for this to be progressed,
 21 and that wasn't something for the Investigation
 22 Team to deal with.

23 Q. We can see who walked away from the meeting with
 24 actions, by scrolling down. I'm going to skip
 25 over 1 and 2. But 3 was left to Mr Baines,
 96

1 Keith Baines:
 2 "... to prepare and circulate to meeting
 3 attendees a first draft of a Business Policy
 4 document ... on Horizon including guidance on
 5 what should be said to subpostmasters raising
 6 concerns beginning (and why)."
 7 That document:
 8 "... should also provide guidance on how to
 9 recognise potential cases.
 10 "4. DH [Dave Hulbert] -- to propose
 11 a process for coordinating business response to
 12 potential cases."
 13 Then, lastly:
 14 "5. [Keith Baines] -- to discuss the need
 15 for and [terms of reference] of an external
 16 expert with Fujitsu."
 17 Then over the page at 6, Mr Baines again,
 18 the third action that he had:
 19 "... to brief Dave Smith on the meeting's
 20 recommendations."
 21 Would that be Dave Smith, IT Dave Smith, or
 22 Managing Director, Dave Smith?
 23 **A.** I'm just trying to think. I think Alan Cook was
 24 still there then, so it would have been Dave
 25 Smith but I think he was Operations Director.

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1 and I don't know how much involvement we would
 2 have had other than being the experts in the ARQ
 3 process.
 4 **Q.** Can I turn to the preparation of case files,
 5 please.
 6 **A.** Yes.
 7 **Q.** That can come down. Thank you.
 8 You tell us in your witness statement --
 9 it's paragraph 22, it needn't come up -- the
 10 process for the preparation of a case file to be
 11 submitted to Casework and then on to the lawyers
 12 within the Criminal Law Team. Can we look,
 13 please, at some practical examples of this.
 14 Firstly, POL00104747.
 15 Can we look, please, at paragraph 3.2 to
 16 start with, which is on page 3. Thank you. So
 17 this is a policy setting out the creation of
 18 casework files and the submission of casework
 19 files. It says, as its "Purpose" -- I skipped
 20 over it and I shouldn't have done:
 21 "The aim of the policy is to ensure adequate
 22 controls are in place to maintain standards
 23 throughout investigation processes."
 24 **A.** Yes.
 25 **Q.** It's dated January -- sorry, it's effective from

99

1 I can't recall his role. I think he had
 2 something to do with operations and not just IT
 3 but I may be wrong.
 4 **Q.** Looking at this as a whole, would you agree that
 5 some fairly serious concerns were being raised
 6 here about the way in which the business was
 7 responding to challenges made by subpostmasters
 8 to the accuracy and reliability of Horizon?
 9 **A.** Yes, that's right.
 10 **Q.** That a series of actions were raised, including
 11 (1) to record and coordinate the number and
 12 nature of the challenges, and (2) to consider
 13 the appointment of an independent expert to
 14 report on both Horizon's generic reliability and
 15 on individual challenges that were made.
 16 **A.** Yes.
 17 **Q.** So far as you're aware, were neither of those
 18 things done?
 19 **A.** I don't recall. There were other discussions
 20 that we had, there were other emails in the
 21 bundle around discussions that I'd had with
 22 Keith Baines and Mandy about what we should do
 23 and how we should do it. I think we discussed
 24 it probably in our one-to-ones with Rod but, as
 25 I say, Rod was the person in charge of that area

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1 March 2000. Can you see there's a list of the
 2 documents that needed to be included from the
 3 fourth and fifth bullet points in the file:
 4 "Enclosure envelopes should be used to
 5 enclose the following supporting documents ...
 6 "(a) Appendix A."
 7 **A.** Yeah.
 8 **Q.** "Original statements and, where appropriate,
 9 copies of original exhibits."
 10 "(b) Appendices B, C etc ...
 11 Then there's a long list of documents, yes?
 12 **A.** Yes.
 13 **Q.** We can see, amongst the long list of documents
 14 to be included within Appendices B and C, about
 15 six down, "Disclosure forms". What were
 16 disclosure forms?
 17 **A.** In this context, I'm not entirely sure. They
 18 may have been the disclosure forms that we would
 19 use later when we came to produce a committal
 20 bundle. That could possibly be what they were.
 21 **Q.** Do you mean the --
 22 **A.** The sensitive --
 23 **Q.** What we might know --
 24 **A.** -- in the report, yeah.
 25 **Q.** -- as schedules of sensitive and non-sensitive

100

1 unused material?

2 **A.** Yes.

3 **Q.** Can we look, please, at POL00064235. This is
 4 an example I've picked of Ms Hamilton's case, as
 5 an example. Can you see this is headed
 6 "Disclosure Officer's Report"?

7 **A.** Yes.

8 **Q.** If we just pan out a little bit, please, just so
 9 you can see the whole thing, and then look over
 10 the page, and the next page. If you see at the
 11 foot of the page, bottom left, there is
 12 a generic description of the document as
 13 a CS006E report; can you see that?

14 **A.** I might be able to. Yeah, I can see that.

15 **Q.** That's on each page. So this is a Disclosure
 16 Officer's report, rather than, I think,
 17 a schedule of sensitive or non-sensitive
 18 material. If we go back to page 1, please, and
 19 look at the rubric underneath the heading. The
 20 form says:
 21 "The following items are listed on the
 22 schedule(s) for this case and may undermine the
 23 prosecution case (primary disclosure)/assist the
 24 defence [case] (secondary disclosure)/or are
 25 required to be supplied under section 7.3 of the
 101

1 No from the schedule."

2 **A.** Yes.

3 **Q.** We know that they are a reference respectively
 4 to the documents or the form representing, in
 5 the first instance, the non-sensitive and, in
 6 the second instance, sensitive unused schedules.
 7 So if we move up to the top of the page
 8 again, the document's requiring the author to
 9 set out which schedule the document appears on,
 10 whether it's a sensitive or non-sensitive
 11 schedule, and then the item on that schedule,
 12 yes?

13 **A.** Yes.

14 **Q.** Does it follow that, in order to submit
 15 a casework file to the Criminal Law Team for
 16 a charging decision, a Post Office Investigator
 17 should have completed the schedules of unused
 18 material in both species and a disclosure report
 19 before doing so?

20 **A.** I can't recall exactly. I know they had to
 21 produce the first two. I'm not sure and I don't
 22 think anyone was ever really sure who the
 23 Disclosure Officer actually was. I think a lot
 24 of emphasis was placed on the first two
 25 schedules. On this one, I'm not entirely sure.
 103

1 Code (delete as [appropriate])."

2 So this is requiring in a Disclosure
 3 Officer's report to identify any unused material
 4 which might undermine the prosecution case or
 5 assist the defence --

6 **A.** Yes.

7 **Q.** -- which is, in a compressed way, essentially
 8 the test under the 1996 Act for disclosure?

9 **A.** I just followed instructions, I don't know the
 10 legal stuff.

11 **Q.** Okay. It also states that the list will include
 12 material that's required to be supplied under
 13 Section 7.3 of the Code. What would you
 14 understand that to be a reference to?

15 **A.** I probably knew 17 years ago.

16 **Q.** But you don't now?

17 **A.** I wouldn't have the first idea today.

18 **Q.** Then the first two columns, the "Schedule" and
 19 the "Item number", can you see that they've got
 20 an asterisk next to them?

21 **A.** Yes.

22 **Q.** If we go down to the bottom of the page, a bit
 23 further, can you see the asterisk is picked up?

24 **A.** Yes.

25 **Q.** "Enter [either] CS006C or CS006D and enter Item
 102

1 I would imagine that they would produce both the
 2 schedules and this one.

3 **Q.** But you can't recall the stage of the process --

4 **A.** I can't recall.

5 **Q.** -- at which that occurred?

6 **A.** No.

7 **Q.** Whether it was before submission of the file to
 8 the criminal lawyer --

9 **A.** I think --

10 **Q.** -- or after a charging decision had been made?

11 **A.** I think this was usually done after. I think
 12 this was part of the committal bundle.

13 **Q.** Does that mean that the reviewing lawyer
 14 wouldn't have seen the unused material?

15 **A.** No, if there was anything in the evidence that
 16 helped the defence or undermined the
 17 prosecution, it would have been brought to the
 18 lawyer's attention at the time the report was
 19 written but it would probably --

20 **Q.** By what means?

21 **A.** Probably in the body of the report.

22 **Q.** Can we just look at paragraph 31 of your witness
 23 statement, please?

24 **A.** I might have that wrong. I don't recall when
 25 these forms were completed.
 104

1 **Q.** Can we just look at paragraph 31 of your witness
2 statement, which is on page 12. If we scroll
3 down, you say:

4 "I have been asked to consider two documents
5 ... (Casework Management documents [one of which
6 I took you to a moment ago]). I have no memory
7 of these specific documents, but I recognise
8 what they are and I believe they would have been
9 circulated to all investigators as part of
10 a Security Circular when I was an Investigator."

11 Then over the page, please, three lines in:

12 "Bullet [point] 4 of page 2 is
13 an instruction of what to include on
14 an operational or procedural failures report and
15 where to put this on the disclosure forms.
16 I believe this would have applied to any bugs,
17 errors or defects in the Horizon system that
18 could have had an impact on a prosecution.
19 Compliance checks were undertaken in all cases
20 to ensure that the content requirements were
21 met", et cetera.

22 So are you saying there that, in relation to
23 procedural failings, they ought to be identified
24 both in the disclosure forms and in the report,
25 the Investigating Officer's report.

105

1 deliberately not told something to a suspect
2 because, if we picked up procedural issues, they
3 would have been discussed with anybody who was
4 being interviewed under caution while we were
5 interviewing them because, obviously, if we're
6 going to conduct a prosecution and we are
7 talking about potential failures in procedure
8 that could have facilitated a loss, we'd have to
9 discuss them with the suspect in interview
10 because, otherwise, what's the point of
11 conducting a prosecution? You've got to
12 establish what they've got to say about things.

13 **Q.** You tell us in your witness statement -- this
14 can come down -- elsewhere, paragraph 22, that
15 bugs, errors and defects in Horizon would have
16 counted as the sort of procedural failing that
17 the guidance that we've looked at was intended
18 to cover?

19 **A.** I would think so, yes.

20 **Q.** Did you ever see bugs, errors or defects in
21 Horizon listed on a disclosure report or in
22 a schedule of unused material, whether sensitive
23 or non-sensitive?

24 **A.** I don't recall ever seeing them but I don't know
25 that I would necessarily have seen the schedules

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1 **A.** In the report in the case file. I don't think
2 it changed in my time, but any operational
3 procedural failures would be included in the
4 report in the case file. They may not have been
5 included in the discipline file but I can't --
6 I know the reports moved around a little bit but
7 there was always a duty to ensure that anything
8 that potentially undermined the prosecution was
9 brought to the solicitor's attention at the
10 start.

11 **Q.** You said in the course of that answer "they may
12 not have been included in the discipline
13 report". Why was that?

14 **A.** It would depend on what it was. If it was they
15 kept leaving the safe open or they shared tills,
16 I believe that would have been included.

17 **Q.** Was it because the discipline report went
18 straight to the suspect?

19 **A.** No, I don't believe we would ever do anything --
20 anything that we thought -- bear in mind the
21 suspect will have had all those things discussed
22 with them at interview, they would know what we
23 were going to say. I don't think -- it's a long
24 time ago.

25 I don't think we would ever have

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1 because, in my role, I don't know if I would
2 have needed to see the schedules.

3 **Q.** You've anticipated my next question, what did
4 you get, as the DPA, the designated prosecuting
5 authority, in terms of schedules of used and
6 unused material, when you were making
7 a decision?

8 **A.** So if I was -- when I was making -- it would
9 depend. I sat upstairs from the Casework Team
10 so, if I was on site, I would probably be sent
11 the case file and I would read the entire case
12 file.

13 **Q.** That would include schedules of sensitive --

14 **A.** If they were there, yes.

15 **Q.** -- and non-sensitive?

16 **A.** Yes, because if I saw anything in the case file
17 that was suggested that there was a reason the
18 prosecution might be at risk then I would
19 probably want to discuss it with a solicitor.
20 If I wasn't onsite, I would -- if there was
21 an urgent need to do something, they would have
22 sent me the report, the taped summaries, any
23 interim reports and the advice from the
24 solicitor, in order for me to make a decision.

25 **Q.** The schedules of sensitive and non-sensitive

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1 unused, were they the responsibility of the
2 Disclosure Officer in the case?
3 **A.** Yes.
4 **Q.** Was there any process of a reviewing lawyer
5 checking them?
6 **A.** I believe that they were always checked by the
7 lawyer.
8 **Q.** What does checking or what did checking involve?
9 **A.** Reading through the schedules, making sure
10 anything that was on the two front schedules, if
11 it -- if necessary, was included on the third
12 schedule, probably ensuring -- and I don't know
13 how much of this was based on trust -- that the
14 Investigator included everything that needed to
15 be included on the schedules.
16 **Q.** That's quite an important qualification, the
17 extent to which it was based on trust. To what
18 extent was there intrusive oversight of the
19 completion of schedules of unused material by
20 reviewing lawyers?
21 **A.** I can only -- I can't say for definite. Bear in
22 mind that the National Investigation Team were
23 spread across the land and the solicitors
24 were -- who took the initial advice were all
25 based in Croydon and then in Victoria, they

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1 **SIR WYN WILLIAMS:** Yes, of course.
2 **MR BEER:** Thank you very much.
3 (12.42 pm)
4 (The Short Adjournment)
5 (1.45 pm)
6 **MR BEER:** Good afternoon, sir, can you see and hear
7 me?
8 **SIR WYN WILLIAMS:** Yes, thank you.
9 **MR BEER:** Thank you very much.
10 Good afternoon, Mr Utting. Can we turn to
11 your role as the designated prosecuting
12 authority, sometimes called the prosecuting
13 authority, prosecution authority or DPA in the
14 papers.
15 You tell us in your witness statement that
16 you believed that it was the business policy to
17 prosecute and you would authorise prosecutions
18 if Legal Services advised that the Post Office
19 advised might be successful.
20 Can you help us with what you mean by it was
21 the business's policy to prosecute?
22 **A.** By the time I joined POID in 1992, I was always
23 led to understand that where a crime was
24 committed against the Post Office, if it was
25 within the guidelines to prosecute, then the

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1 wouldn't have had the ability to go to
2 an Investigator's office in Scotland and check
3 that he'd included everything on his schedules.
4 It was very much down to the Investigators to
5 ensure that all of their evidence was included.
6 **Q.** So Investigators were essentially responsible
7 for what went on a schedule and what didn't?
8 **A.** Initially, yes. Definitely.
9 **Q.** Initially? When did it position change?
10 **A.** No, if, during the course of a case, the
11 barrister asked a question or a solicitor asked
12 a question about something, there could be
13 an occasion where something was referred to in
14 an Investigation report and then, when you
15 looked in the schedules, it wasn't there. So
16 then the solicitor would come back and say,
17 "Well, you've mentioned this, it's not on the
18 schedules, can we make sure it's on the schedule
19 and can you check to see if there's anything
20 else".
21 **MR BEER:** Thank you.
22 Sir, I'm about to turn to a separate topic,
23 Mr Utting's role as the designated prosecuting
24 authority, and look at some case studies.
25 I wonder if we might break until 1.45.

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1 Post Office would prosecute.
2 **Q.** What do you mean by "within the guidelines"?
3 **A.** So I probably didn't know at 1992, but later on
4 in my career I understood how Legal Services
5 would consider their advice and I believe they
6 followed -- I didn't know at the time, I don't
7 think, but from looking at things since, they
8 followed the same Code as the Crown Prosecutors.
9 **Q.** When you became more senior, in the position in
10 2002 to 2007 in particular, did you have
11 an understanding of how the Code for Crown
12 Prosecutors worked?
13 **A.** I would say yes, but probably not to the level
14 that you guys do.
15 **Q.** Can you explore the space in between those two
16 possibilities. Did you have a copy of it?
17 **A.** No.
18 **Q.** Did you ever have a copy of it?
19 **A.** No.
20 **Q.** Did you ever receive any training on making
21 prosecutorial decisions?
22 **A.** I don't know if there was any formal training.
23 I probably had a session with either Rob --
24 **Q.** Rob Wilson?
25 **A.** Yes, sorry, and maybe Phil Gerrish, because he

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1 did it before me. I don't think there was
2 a formal training.
3 **Q.** You tell us in your witness statement at
4 paragraph 48 that, in order to approve
5 a prosecution, you would have had to have read
6 the case file and the advice from Legal
7 Services?

8 **A.** Yes.

9 **Q.** Having read the case file and the advice from
10 Legal Services, what criteria did you apply when
11 authorising a decision to prosecute or making
12 a decision to prosecute?

13 **A.** So it was probably very basic. So I would read
14 the case file, the taped summary and look at the
15 evidence from an Investigator's perspective and
16 then read the lawyer's advice, and I would only
17 challenge it if I thought that they were
18 prosecuting and I wasn't sure they should, or
19 they were suggesting charges other than what
20 I thought.

21 And it would more be a case around if they
22 were recommending theft and false accounting, or
23 just false accounting, and I thought they
24 should -- they should be pursuing theft I might
25 have a conversation with the lawyer to establish

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1 why it came from us.

2 **Q.** Would you consider interview summaries or
3 transcripts when authorising prosecutions?

4 **A.** Yes.

5 **Q.** Would you or did you ever raise questions about
6 obtaining additional evidence, having read such
7 interview summaries or transcripts?

8 **A.** I don't recall. I think, once the case had come
9 through the casework team, the prosecution was
10 very much a matter between the lawyer and the
11 Investigator and counsel, if and when they came
12 on board.

13 **Q.** So you viewed it as a complete package; is that
14 right?

15 **A.** Yeah.

16 **Q.** It wasn't your job to start suggesting
17 additional enquiries or similar?

18 **A.** Not in those cases. When I was the
19 Investigation Manager, if I had an Investigator
20 that I was looking at a case -- particularly
21 a more junior Investigator, if I was looking at
22 their case before it went in, then I might
23 suggest further enquiries or further witness
24 statements but, once it came to the prosecution
25 authority, my role was to authorise the

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1 why.

2 **Q.** Why would you think that theft ought to be
3 pursued in addition to false accounting?

4 **A.** Well, if the case papers to me, as
5 an Investigator, suggested that theft was
6 a charge that we might apply, then I might ring
7 the solicitor and ask why not. But, ordinarily,
8 if they explained to me the reasons, then
9 I would authorise what they suggested.

10 **Q.** That's looking at adding a charge or charges.

11 **A.** Yes.

12 **Q.** What about the other way round? On what basis
13 would you decide not to authorise a prosecution?

14 **A.** I don't recall ever not authorising
15 a prosecution --

16 **Q.** That was my next question: did you ever say no?

17 **A.** I don't recall ever saying no. They were the
18 experts and they would give the advice.

19 **Q.** Did they advise on both evidential sufficiency
20 and public interest?

21 **A.** From my recollection, yes.

22 **Q.** What was the purpose of your involvement?

23 **A.** Legal Services were independent of the business
24 and the decision to prosecute needed to come
25 from the business. This is my understanding of

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1 prosecution and leave experts to get on with it.

2 **Q.** Can we look, please, at POL00048207. This is
3 an email that you sent on the 17 October 2006
4 to -- I think that's a generic email account,
5 isn't it, Investigation Team --

6 **A.** That's the Casework Team.

7 **Q.** That's the whole of the Casework team's email
8 account, essentially?

9 **A.** Yes.

10 **Q.** "Re: DAM Authority [for] Josephine Hamilton",
11 and you say, "Prosecution please".

12 **A.** Yes.

13 **Q.** Did you prepare a report or document or précis
14 of your analysis of the evidence?

15 **A.** No.

16 **Q.** Would you simply convey of the outcome of your
17 decision over email like this?

18 **A.** Ordinarily, no, I would write in the case
19 papers. I believe this would have been
20 a situation where I wasn't in the office, and so
21 they emailed me. They possibly rang me as well,
22 if they needed it done, if I'd been away from
23 the office for a couple of days, then I would
24 simply have replied to the email. Which is why
25 it says, "Re", because I think this was a reply

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1 to an email.

2 **Q.** So the substance of your decision is conveyed in
3 these two words: "Prosecution please"?

4 **A.** Simply, yes.

5 **Q.** If you wrote something in the case papers, it
6 would be similar, "Prosecution" or "Prosecution
7 approved"?

8 **A.** "Authorised", something like that.

9 **Q.** "Prosecution authorised"?

10 **A.** Yeah.

11 **Q.** Does that reflect the fact that you were
12 essentially a rubber stamp?

13 **A.** It's a very simple way of putting it.
14 I wouldn't see it quite like that because, if
15 I was simply a rubber stamp then I wouldn't have
16 read all the case papers; I would have just said
17 "Yeah, get on with it", but that's not how it
18 worked.

19 **Q.** You've told us that you conveyed the outcome in
20 one or two words and that you never said no. It
21 sounds like a rubber stamp?

22 **A.** It does. I'm not going to argue that it sounds
23 like a rubber stamp. I didn't see it that way.

24 **Q.** Why didn't you see it that way?

25 **A.** Because I was being asked to look at the case

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1 we --

2 **A.** Some, yes.

3 **Q.** -- have: Adedayo, Thomas, Skinner and Blakey,
4 just referring to them, with no disrespect, by
5 their surnames?

6 **A.** I think I've seen taped summaries and excerpts
7 of verbatim. I'm not sure if I've seen full
8 transcripts of all their interviews.

9 **Q.** Let's just look at one of them, Blakey, please.
10 Can we start by POL00044830. If we just scroll
11 through this, we'll see that it's largely
12 a transcript, albeit breaks into summary in
13 places. If we just scroll then you'll get the
14 idea of it, keep scrolling. You can see it's
15 a pretty full transcript?

16 **A.** Oh yes, yes.

17 **Q.** If we just go back to page 1, please, we can see
18 this is an interview of David Blakey conducted
19 by Paul Whitaker with Helen Dickinson present
20 and, indeed, she asked some questions too, of
21 13 May 2004. I think this was one of the cases
22 in which you were a decision maker?

23 **A.** Probably, if it's in the bundles, yes.

24 **Q.** Paul Whitaker, presumably you knew him, he was
25 one of your team?

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1 papers and agree that what Legal Services was
2 advising was the correct way to go.

3 **Q.** You were reliant on the summary of the
4 investigation carried out by the Investigator in
5 the offender report?

6 **A.** Alongside the taped summaries and the evidence
7 and the advice of Legal Services.

8 **Q.** In what circumstances would you be in possession
9 of a full interview transcript?

10 **A.** At the point prosecution authority, unless the
11 case had gone to Legal Services and they
12 declined to advise until their team had full
13 transcripts of interview, I would never see
14 a transcript.

15 **Q.** Was it rare that a full transcript was prepared?

16 **A.** Yes.

17 **Q.** Why was that? Was that cost?

18 **A.** It was probably cost, effort, the time it would
19 take. We had strict timescales on which -- in
20 which people had to submit papers. I think from
21 the time I joined Investigations, we'd always
22 done taped summaries and transcripts were only
23 prepared if counsel asked for them.

24 **Q.** I think we've shown you a series of interview
25 transcripts from the criminal case studies that

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1 **A.** He was in one of the Investigation Teams.
2 I think he was North of England team.

3 **Q.** Have you read -- appreciating that, like me,
4 you've got three bundles of papers -- have you
5 read this recently?

6 **A.** I think I probably read this the middle of
7 October when I first got it, when I was writing
8 my witness statement. But I read all these
9 documents then, so my recollection is not going
10 to be fantastic.

11 **Q.** Can we pick it up -- and I'll try and remind you
12 without going through it laboriously because
13 we've already looked at this with Mr Whitaker --
14 bottom of page 4, please. Mr Blakey says, last
15 line:

16 "About three months ago money started to go
17 missing I covered this up hopping to replace it.
18 My wife had been ill ... I can go into more
19 detail about that later on if you wish ... I've
20 got an appointment with the bank manager next
21 week I was hopefully going to take out a loan to
22 replace it", et cetera.

23 Then middle of the page, there's a summary
24 rather than a transcript:

25 "DB states the figure seemed to accumulate.

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1 He states that when they took over the office
 2 some time ago they suffered a few discrepancies
 3 which he put down to someone 'unsavoury' working
 4 for him. [Mr Blake] states that his wife
 5 suffers from asthma and whilst the office was
 6 suffering the big discrepancies a few years ago
 7 she was worrying. Some of those discrepancies
 8 came back through error notices, some did not.
 9 [Mr Blakey] states he replaced the money and
 10 everything was above forward. But it did not
 11 stop his wife from being ill. [Mr Blakey]
 12 states that when the losses appeared in the
 13 account more recently, he tried to protect her
 14 by not telling her. The last thing he wanted
 15 was for her to be that ill again. [Mr Blakey]
 16 states that before he knew where he was the
 17 amount had just built up and built up to where
 18 it is today. [Mr Blakey] states he should have
 19 told someone in the early days."

20 Then Mr Whitaker bottom of the page, about
 21 five or six lines up:

22 "In relation to this money going missing.
 23 Where do you think it's gone?"

24 **"Answer:** I honestly don't know. Goodness
 25 knows ... I wish I did.

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1 **"Answer:** No, that's true.

2 **"Question:** That's not true, you don't run
 3 a business like that, David ...

4 **"Answer:** No, I know you don't ... but."

5 Mr Whitaker interrupts:

6 "Now come on ... I accept your candidness in
 7 relation to you've come in here and you've said
 8 yeah ... you've held your hands up to say the
 9 money's gone ... you've been covering up to
 10 replace it ... but you cannot sit here and
 11 expect me to believe that you don't know where
 12 £60,000 has gone."

13 Then over the page, please.

14 Third line Mr Whitaker:

15 "It doesn't disappear. Money goes out of
 16 an office through incompetence or dishonesty
 17 ..."

18 Then when he next speaks:

19 "... now if your staff are incompetent you
 20 get them together and say 'Pull your bloody
 21 socks up' or if they are dishonest you get them
 22 together and you say 'One of you is having this
 23 away', or you get on to the police or it's
 24 sorted out that way. That's not happened, has
 25 it? You know where this money's gone because

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1 **"Question:** Do you think it's a member of
 2 your staff that's stealing?

3 **"Answer:** No, I'll be absolutely honest;
 4 I trust the staff 100 per cent."

5 Over the page, please. He says he can't
 6 point the finger at any member of staff and
 7 says, "She won't make mistakes".

8 Then Mr Whitaker says, about 12 lines in:

9 "I don't think you're telling me the truth
 10 there, are you, David?"

11 He says:

12 "Well", and is then interrupted.

13 **"Question:** I don't think you're telling me
 14 the truth.

15 **"Answer:** It's some time ago to be honest
 16 with you ...

17 **"Question:** Not particularly about that.
 18 You know where the money's gone, because you've
 19 been taking it, haven't you, David?

20 **"Answer:** No way, no honestly, as God is my
 21 witness ...

22 **"Question:** So you're saying that £60,000
 23 has gone in a matter of months and you've not
 24 drawn it to the attention of anyone, not even
 25 your wife?

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1 you're the one who's been taking it, David.
 2 Aren't you?"

3 He says "No", again.

4 Then foot of the page, a bit further down,
 5 last section:

6 "I can understand you've probably got your
 7 wife's welfare at heart. But the size of the
 8 climb in respect of this. You can't expect me
 9 to believe that you didn't know or you didn't do
 10 something about it. If it's not you ... if it's
 11 not you that's doing it you've got no reason to
 12 shield anybody from it. I can understand for
 13 health reasons your wife. But you can't shield
 14 this from your staff because if it's not you
 15 stealing and you don't suspect your wife then
 16 it's got to be your staff."

17 Over the page, please. Third section:

18 "I know I'm right [says Mr Whitaker] because
 19 I know. David, I don't know what you are trying
 20 to ... Your reasons for doing it or whether
 21 you're helping anyone or think you are shielding
 22 anyone by not telling the truth but you are not
 23 telling me the truth David, you can't sit here
 24 and expect me to believe you."

25 Then scroll down, please, fourth section

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1 from the bottom:
 2 "Is it something your wife doesn't know
 3 about? I mean we turn up on a Thursday morning,
 4 a lot of places, sub post offices and stories
 5 we've heard, you wouldn't believe a lot of them.
 6 But I know people get in trouble with various
 7 things ... with gambling ...
 8 **"Answer:** Oh no."
 9 Mr Whitaker continues:
 10 "... Things that their wives or husbands
 11 don't about ... secret lives, secret mistresses
 12 ..."
 13 It continues, "PW" at the bottom:
 14 "[Mr Whitaker] explains that it is not only
 15 him and [Ms Dickinson] that he has to convince
 16 ..."
 17 So that's the interviewer telling the
 18 suspect that it's his duty to convince them.
 19 Then he reads the caution again.
 20 Over the page, please, to page 9 halfway
 21 down:
 22 "You know where this money's gone", says
 23 Mr Whitaker.
 24 **"Answer:** I really don't. I don't know
 25 where it's gone. I really wish I did. I wish
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1 have to sit them down and interview them,
 2 because from what you are saying that's our only
 3 option."
 4 He says:
 5 "Yes."
 6 Mr Whitaker says:
 7 "Because we want to know who's stolen our
 8 money."
 9 Then at the end of the next section:
 10 "[Mr Whitaker] states that he feels the
 11 discrepancies are down to dishonesty, and that
 12 to be thorough, he may have to see all members
 13 of staff, including [Mr Blakey's] wife.
 14 However, [Mr Whitaker] states he feels this can
 15 be avoided as he feels that [Mr Blakey] has
 16 something he may wish to tell [Mr Whitaker]."
 17 He says:
 18 "David, money doesn't go missing like that,
 19 it doesn't go missing. I've been doing this job
 20 a number of years and it doesn't go missing.
 21 Somebody takes it. Now I don't know whether you
 22 think it's better that you'll admit to the
 23 covering up, to the false accounting or the
 24 covering up of it, and it will be all right as
 25 long as you don't admit to the stealing 'cause
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1 I could lay my hands on it now go and through to
 2 my wife and say here you are, love.
 3 **"Question:** Think about what you're saying,
 4 David. Think about what you're saying. If
 5 we're to believe that you don't know where this
 6 money is and if we're to believe you that you
 7 hadn't had it, how many other people work here?
 8 There's the four ladies and your wife."
 9 Then the foot of the page, about ten lines
 10 up:
 11 "Now if you are saying is true. Because we
 12 don't think it's errors perhaps because the
 13 error would come back. So we're looking at
 14 these four ladies. You've just said, well, you
 15 said at the start of the interview, you think
 16 they're as honest as the day is long."
 17 He says:
 18 "Yes, I do."
 19 Then the foot of the page:
 20 "And the thing is we've got to speak to
 21 these four ladies possibly and we've got to
 22 question the honesty and integrity of these four
 23 ladies. Now are we to do that? Because that's
 24 the only option that I can see. You are going
 25 to have to put these four ladies, we're going to
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1 that's not the case."
 2 Then the last page, over the page, bottom
 3 part of the page, the big section, Mr Whitaker
 4 says:
 5 "... and I just don't think it's true
 6 I think you've had it, I think you've had the
 7 money, I think it started ... I'll tell you,
 8 I think it started a number of years ago and
 9 you've had a drip, drip, drip a bit here and
 10 a bit there and it's come to today when the
 11 auditors have turned up because you haven't had
 12 an audit here for a number of years, I don't
 13 know whether you thought well I'm never going to
 14 get one or what, but the auditors turned up
 15 today and you thought, I've been caught, that's
 16 me done, and you've had a think about it and
 17 thought, well, if I say I've covered it up it'll
 18 be all right, nothing will happen, that's what
 19 I think's happened ..."
 20 That can come down, thank you.
 21 Do you agree that this interviewing approach
 22 is for the interviewer to offer their subjective
 23 belief as to whether Mr Blakey is telling the
 24 truth?
 25 **A.** I think it's a tactic that's employed in
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1 an investigative interview. If I had
 2 an Investigator who was conducting
 3 a tape-recorded interview with a suspected thief
 4 and they didn't accuse them of being a thief
 5 during the interview, I'd probably be
 6 disappointed in them.

7 **Q.** I wasn't talking about accusing somebody of
 8 stealing; I was asking about the repetitive
 9 statement of the subjective belief of the
 10 interviewer on whether or not the person is
 11 telling the truth or not?

12 **A.** I think it would depend on the situation on the
 13 day and the feel that the interviewer got for
 14 the person sitting in front of them and whether
 15 they thought they were telling the truth or not.

16 **Q.** So you think that's okay?

17 **A.** Without sitting down and reading the whole thing
 18 again in context, then I don't see anything
 19 massively wrong with that interview.

20 **Q.** Do you agree that the second thing the
 21 interviewer does is to threaten Mr Blakey with
 22 the need to interview his ill wife, which
 23 procedure could only be saved if he admitted the
 24 theft himself?

25 **A.** I think it could be put better but I think

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1 after a mistress --

2 **A.** I'm not --

3 **Q.** -- or similar?

4 **A.** I'm not sure why he mentioned that. Why
 5 somebody had done something or suggested things
 6 like that, probably -- it's probably not the
 7 most professional approach.

8 **Q.** Would you agree that, sixthly, he, Mr Whitaker,
 9 was seeking to badger or hector Mr Blakey into
 10 making an admission?

11 **A.** "Badger and hector" I would probably disagree
 12 with but, yes, he was definitely exerting
 13 pressure.

14 **Q.** Again, on the appropriate side of the line,
 15 then, in your view?

16 **A.** I would say so, yes.

17 **Q.** So if you read this at the time you wouldn't
 18 think "(Sharp intake of breath) Ouch"?

19 **A.** No, I don't think.

20 **Q.** So did you ever receive any complaints regarding
 21 Investigators' interviewing or questioning
 22 technique --

23 **A.** Um --

24 **Q.** -- ie being oppressive in an interview?

25 **A.** I don't believe so. Every interviewer

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1 sometimes you need to be clear with the person
 2 you're talking to what the next steps are going
 3 to be. I don't think there's any value in
 4 concealing from them what the extent of the
 5 investigation is likely to be.

6 **Q.** So nothing wrong in that --

7 **A.** I'm not sure of the context but it's a long time
 8 since I did this. Reading it now, I'm not sure
 9 there's much wrong with that approach.

10 **Q.** Thirdly, would you agree that the interviewer
 11 threatened Mr Blakey with the need to interview
 12 the four ladies that worked at the branch to
 13 "put them through it", as he said, which could
 14 be avoided if only he admitted to the theft?

15 **A.** Again, I think the way he's put it could be done
 16 better. I think it would have to be made clear
 17 that the other ladies would be interviewed but
 18 I'm not sure -- I'm not sure if he intended it
 19 to be a threat. I think he was just laying out
 20 what the next stages of the investigation would
 21 be but, obviously, it's up to perception from
 22 the person reading it.

23 **Q.** Fifthly, would you agree that Mr Whitaker
 24 speculates that Mr Blakey was saving the money
 25 that he stole for a retirement plan to look

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1 approaches their interview in different way. We
 2 were all trained in cognitive interviewing
 3 techniques and one of the techniques we were
 4 supposed to employ was to try to get the person
 5 on side, so having an antagonist particular
 6 approach in an interview is a surefire way of
 7 getting the shutters drawn down. So it wasn't
 8 the approach I would have taken but some people
 9 got results in different ways.

10 **Q.** Are you saying by that that you operated a broad
 11 church and that a variety of styles were
 12 permissible, including this one?

13 **A.** Yes, I would say so. Every Investigator had
 14 their own personality and their own way of doing
 15 things.

16 **Q.** They could bring their own personality to bear
 17 onto a subject in interview?

18 **A.** As long as they stayed within policy guidelines
 19 and the law, yes.

20 **Q.** What were the policy guidelines on interviewing
 21 suspects?

22 **A.** That all the evidence should be covered.
 23 Obviously, I've just explained we were trained
 24 in interview techniques. Badgering, obviously,
 25 was something that was frowned upon. If

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1 somebody did go over of the line and it was
 2 brought to our attention -- and I would expect
 3 that to come out either through the solicitor in
 4 the case or when the case went to court because
 5 defence would obviously have a view on it --
 6 then it would come back and would need to be
 7 looked at but I don't recall ever having any of
 8 those cases ever come back.

9 **Q.** By that last answer, are you saying you would
 10 wait for complaint to be made in the course of
 11 court proceedings as the judge of whether
 12 interviewers were --

13 **A.** If I saw inappropriate behaviour by
 14 an Investigator, whether it be on
 15 a tape-recorded interview or when we went into
 16 an office, then that Investigator would have
 17 a discussion. But I don't remember having to
 18 have a discussion in relation to a tape-recorded
 19 interview.

20 **Q.** That's in the entirety of the seven years that
 21 you held a relevant role?

22 **A.** In relation to tape-recorded interviews, yes.
 23 I do remember speaking to an Investigator about
 24 how they behaved when we went into an office one
 25 day to speak to the manager but that was not to

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1 **Q.** Did such cases end up in prosecutions?

2 **A.** I don't think so. I don't remember having
 3 an argument that I won.

4 **Q.** So you did see cases where there was an agreed
 5 insufficient evidence to prosecute?

6 **A.** Yes.

7 **Q.** What were the reasons for those? Can you
 8 remember the evidential insufficiency?

9 **A.** I think most of the time it was because there
 10 was a possibility that something else had
 11 occurred. So if there were poor procedures in
 12 an office and there was a counter loss and we
 13 couldn't ascribe the loss to an individual,
 14 an individual may well have been interviewed
 15 under caution and the case file gone to Legal
 16 Services for advice but, if they saw elements in
 17 the evidence that suggested that there was
 18 a risk to the prosecution because, say, other
 19 people had access to the till or the safe or
 20 whatever --

21 **Q.** A bit like Mr Blakey?

22 **A.** Potentially, yes, yes.

23 **Q.** Where, as things stood at the date of the
 24 interview, there were six people --

25 **A.** Yes.

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1 do with talking to a suspect.

2 **Q.** If a member of the Criminal Law Team decided
 3 that there was insufficient evidence to meet the
 4 test for prosecutions, would the file ever reach
 5 your desk?

6 **A.** Yes.

7 **Q.** It would?

8 **A.** I think so.

9 **Q.** Why do you think so?

10 **A.** I think if there was a view that we needed to
 11 discuss the case with Legal Services, it might
 12 come back. It might come to me in order that
 13 I could have the discussion with Legal Services.
 14 I don't recall exactly whether the Casework Team
 15 had authority to close down an investigation if
 16 the case had been put forward for prosecution
 17 and the advice came back negative. They may
 18 have done.

19 I think -- I do remember, I think, seeing
 20 some cases where they suggested that there was
 21 no value in prosecution but the case came to me
 22 so I could have a discussion.

23 **Q.** Did you talk Legal Services or the Criminal Law
 24 Team around?

25 **A.** No, I would just ask them the reasons.

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1 **Q.** -- him, his wife and four counter staff --

2 **A.** Yes.

3 **Q.** -- who could equally have been responsible for
 4 the theft but the interviewer was putting it on
 5 the basis of: it must be Mr Blakey?

6 **A.** Yeah, I think there were other things in the
 7 papers in the report had suggested why he went
 8 down that line. I can't recall them
 9 immediately, but I don't recall the case. But,
 10 looking at the papers, I think there was some
 11 reasons why they went down that road. But
 12 I can't recall what they were.

13 **Q.** If a criminal lawyer decided that there was
 14 sufficient evidence to prosecute but that
 15 prosecution wasn't in the public interest, would
 16 the file reach your desk?

17 **A.** Probably.

18 **Q.** Did you ever overrule such advice, ie you
 19 decided that the public interest test was met?

20 **A.** I don't recall. It's unlikely. We may have had
 21 a frank discussion about it but I doubt I would
 22 have overruled them.

23 **Q.** Was cautioning a suspect a facility open to the
 24 Post Office?

25 **A.** No.

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1 Q. By that, I don't mean a criminal caution
 2 preparatory to an interview --
 3 A. No, I know what you mean.
 4 Q. -- but like a formal warning?
 5 A. I think we -- we did have people cautioned but
 6 I think -- I don't remember if we did it in Post
 7 Office Limited, but I know with Royal Mail cases
 8 if we'd had a postman arrested or if -- we may
 9 even have administered cautions, I can't
 10 remember if we administered cautions or not, but
 11 I know that in Royal Mail cases with very minor
 12 theft cases or wilful delay, we might have the
 13 police caution an offender but I don't recall if
 14 we did it ourselves.
 15 Q. Okay. Can I move to a new topic, please, which
 16 is the extent to which Post Office focused on
 17 debt recovery. You tell us in your witness
 18 statement that, after you became National
 19 Investigations Manager, you also became a member
 20 of the Royal Mail Group Security Committee,
 21 which was comprised of the most senior and
 22 experienced security managers within Royal Mail.
 23 A. That's right, yes.
 24 Q. Did the Royal Mail Group Security committee
 25 exist for the entirety of your period as

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1 addressing concerns that were being raised about
 2 the reliability of Horizon?
 3 A. Yes.
 4 Q. Were those concerns fed back to the Royal Mail
 5 Group Security Committee?
 6 A. I would imagine, yes.
 7 Q. Would it not be the ideal forum for the
 8 provision or exchange of information about
 9 concerns or allegations about problems with
 10 Horizon and concerns about the lack of facility
 11 and oversight within Post Office Limited for the
 12 management of such allegations?
 13 A. I think it was important, I think, that the
 14 Committee was aware but, because Horizon was
 15 business unit specific, it was probably not the
 16 place to get action undertaken, because this was
 17 just the Security people from all the business
 18 units talking to Andrew Wilson, and not Post
 19 Office Limited.
 20 It was much -- Andrew may have been a good
 21 person to use as a lever to get the business to
 22 do something but he wasn't the person to take
 23 charge of that because he only dealt with
 24 Security and Criminal Investigations; he didn't
 25 deal with business policy, the postmaster's

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1 National Investigations Manager?
 2 A. Yes, I believe -- well, it may not have existed
 3 at the start but it certainly existed when
 4 I stopped being involved with Investigations.
 5 Q. What was the role and function of the Royal Mail
 6 Group Security Committee?
 7 A. It was really around Andrew Wilson getting the
 8 most senior people together to discuss what was
 9 going on across the group and Security and to
 10 make sure we were all aligned with where we were
 11 going on what Corporate Security was doing.
 12 Q. How often did it meet?
 13 A. I can't recall. I think it might have been
 14 quarterly.
 15 Q. Was it a formalised and minuted type committee?
 16 A. I think it was but I can't remember.
 17 Q. Were actions raised from it which required to be
 18 addressed following each meeting?
 19 A. I really can't recall. I think I only -- it
 20 can't have been in existence that long because
 21 I think I only went to about four or five.
 22 Q. We've seen, from the November and December 2005
 23 email agenda and minutes, that issues were being
 24 raised at that stage as to the absence of
 25 a collective forum within the Post Office for

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1 contracts, the discipline in relation to
 2 branches, and he didn't have any involvement
 3 with Horizon.
 4 So I don't think he would have been the
 5 right person to do that and that committee
 6 wouldn't have been the right place to deal with
 7 it.
 8 Q. Just explain why. If there was a problem with
 9 Horizon or an alleged problem with Horizon,
 10 which is fairly fundamental to the --
 11 A. It is to the Post Office --
 12 Q. -- to the Post Office --
 13 A. -- but not to Royal Mail Group because the Post
 14 Office is a small part of Royal Mail Group and
 15 Andrew's team was looking at the whole group.
 16 This is a business unit specific issue and,
 17 therefore, would be more properly dealt with
 18 within the business.
 19 Q. Wouldn't you want to tell the group's Security
 20 Committee?
 21 A. I think I said that they were informed of it but
 22 I don't think they took on ownership.
 23 Q. What do you mean by you don't think they "took
 24 on ownership"?
 25 A. I think it was a business unit issue that was

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1 managed and owned within the business.
 2 **Q.** So it was kept within Post Office Limited?
 3 **A.** I -- honestly I can only deal from the Security
 4 perspective with -- as far as Security was
 5 concerned. I believe Andrew would have been
 6 aware but he wouldn't have been actively
 7 involved.

8 **Q.** You tell us in your witness statement,
 9 paragraph 7 -- no need to turn it up -- that you
 10 were responsible in your role for examining
 11 business processes, products and identifying
 12 potential risks?

13 **A.** Yes.

14 **Q.** Did that ever involve the risk of Horizon not
 15 being robust?

16 **A.** No.

17 **Q.** Did it ever involve identifying the risk not
 18 only to the safety and fairness of criminal
 19 convictions but also to the continued operation
 20 of the Horizon system because of any bugs,
 21 errors or defects within it?

22 **A.** No.

23 **Q.** Who was responsible for that kind of big picture
 24 assessment of Horizon?

25 **A.** I would have said the head of IT.

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1 in respect of if you're producing a set of
 2 accounts and the auditors come in, there's
 3 probably a little bit of leeway as to whether
 4 they're 100 per cent accurate or whether they're
 5 100 per cent checked, whereas if we're in
 6 prosecution, we need to be 100 per cent certain
 7 of what we're saying.

8 **Q.** Did you rely in your mind on the fact that
 9 auditors were auditing Post Office Limited's
 10 annual accounts and, therefore, you took from
 11 that that Horizon must be robust and reliable?

12 **A.** Regardless of the auditor function, the Post
 13 Office was using this to manage its business
 14 with its clients and the Government and, of
 15 course, I expected it to be 100 per cent robust.
 16 It should have been and we understood it was.

17 **Q.** So the fact that auditors were performing
 18 a function for an accounting purpose didn't give
 19 you any added -- you didn't rely on that, in
 20 your mind?

21 **A.** I don't think -- it's a long -- I don't remember
 22 what I relied on but the fact that the business
 23 accounts were being signed off by auditors has
 24 obviously got to give us some confidence that
 25 what's in there is right.

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1 **Q.** Who was that, whilst you were National
 2 Investigations Manager?

3 **A.** I think it was Dave Smith but I'm not 100 per
 4 cent sure.

5 **Q.** But it's one thing for an IT system to have
 6 faults which have an impact on accounting: how
 7 do we return our annual accounts in truth and
 8 fairness each year? It's another if you're
 9 using that system, the data produced by that
 10 system, to prosecute people, isn't it?

11 **A.** I mean, I'm a layman but I would say they're one
 12 and the same. If you can't trust the system,
 13 you can't trust your accounts and you can't
 14 choose the data to prosecute people. I don't
 15 think there's any differential in that respect:
 16 it either works or it doesn't and it's either
 17 fit for purpose for both purposes or, in my
 18 view, it's not.

19 **Q.** You don't think there's any difference between
 20 relying on data for evidential purposes to
 21 prosecute somebody in a criminal court versus
 22 the checks and balances that you might apply
 23 from an accounting perspective?

24 **A.** Again, I'm a layman. I would imagine the charge
 25 on the prosecution is probably perhaps greater

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1 **Q.** Did you know, in fact, the extent to which the
 2 auditors examined the operation of Horizon or
 3 whether they entered caveats in the accounts to
 4 say that they had not done so?

5 **A.** I wouldn't be aware of anything of that nature.

6 **Q.** Can we turn, against the context of one of the
 7 answers you gave earlier about the introduction
 8 from, I think you said, 2002/2003 onwards, of
 9 a drive for financial investigations?

10 **A.** I think it was 2003/4.

11 **Q.** '03/'04?

12 **A.** Yeah, I think.

13 **Q.** So can we look, please, at POL00121521. If we
 14 just zoom out, please. You'll see that these
 15 are "Criminal Asset Recovery Security
 16 Guidelines", version 2, dated 2003. You're
 17 attributed co-authorship with MF Matthews?

18 **A.** Yes.

19 **Q.** They're said to be approved by Mick Matthews.
 20 What role did he perform?

21 **A.** I think at this stage he was a Commercial
 22 Security Manager but I'm not 100 per cent sure.
 23 He later became a Financial Investigator.

24 **Q.** There, the owner is said to be Phil Gerrish.

25 **A.** He was my predecessor.

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1 Q. Your predecessor --
2 A. (*The witness nodded*)
3 Q. -- who was given assurance at the foot of the
4 page, and then they were authorised by the Head
5 of Security?

6 A. That would be Tony Marsh.

7 Q. Mr Marsh?

8 A. Yes.

9 Q. Can we turn to page 4, please. Can you see, in
10 the second paragraph, 1.2, you and Mr Matthews
11 state:

12 "By recovering the assets we send out
13 a clear message to the criminal/potential
14 criminal that there is little point stealing as
15 we will endeavour to recover their ill-gotten
16 gains and as such reduce the benefit of their
17 crime. This is a message the present Government
18 wish to send out as they are in the process of
19 setting out the National Confiscation Agency,
20 whose role it will be to remove assets from
21 organised crime."

22 What was the relationship between
23 subpostmasters and organised crime?

24 A. In the great scheme of things, it was rare.
25 There were instances, particularly around this
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1 stage, and we were looking at employing the
2 legislation to make it easier for us to make
3 recoveries in the case of a criminal trial.

4 Q. Were you generally of the view that, if
5 a shortfall was shown at audit, there was likely
6 to have been criminal activity? Was that your
7 *modus operandi*?

8 A. I think you would go into the office with as
9 open a mind as you could. We were --

10 Q. Sorry, what was constraining you from haven't
11 a completely open mind?

12 A. Experience of going into as many audit shortages
13 we did, pre-Horizon and during Horizon, where it
14 wasn't anything other than a crime.

15 Q. So that mindset might colour the ability of
16 an Investigator to have an open mind?

17 A. In practice, possibly. In theory, no.

18 Q. So, in practice, which is what we're more
19 concerned with --

20 A. I understand what you're saying. The difficulty
21 is when you work in investigations and you get
22 called out to the same thing ten times, and nine
23 times -- the first nine times a certain outcome
24 is apparent, when you go in the tenth time, it's
25 very hard to say, "I'm not going to jump to that
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1 time because we were still doing benefits by
2 book and cheque, organised crime would steal
3 benefit books in the course of post and then
4 employ subpostmasters to encash them. So we had
5 cases where hundreds of thousands of pounds per
6 year were being encashed with stolen benefit
7 payments through sub post offices.

8 There was a particular case we did with the
9 DWP where there were a group of subpostmasters
10 who appeared to be working along the same lines,
11 who all knew each other and were all cashing
12 stolen benefit books.

13 Q. So here you're not talking about the species of
14 alleged crime that we're concerned with in this
15 Inquiry --

16 A. No.

17 Q. -- a postmaster prosecuted for allegedly
18 stealing £2,000?

19 A. No -- not in that context, no.

20 Q. Is what we read here a reflection of a new and
21 more aggressive stance taken by the Post Office
22 in financial investigations to send out a clear
23 message to the criminals?

24 A. I don't think it was new. I think it was
25 different. The legislation was new, at that
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1 conclusion until I've seen the facts". You'd
2 like to think that you would always keep an open
3 mind as you go in the door but we're human
4 beings.

5 Q. Isn't that the function of senior management: to
6 ensure that its Investigators remained impartial
7 and independent and retained an open mind and,
8 in particular, would pursue with diligence all
9 reasonable lines of inquiry that pointed away
10 from the guilt of a suspect?

11 A. Yes.

12 Q. How was that hammered home to Investigators, if
13 it was?

14 A. Well, it would be -- it was written in the
15 policies that we had. It was written in the
16 circulars that we had. Legal Services, when
17 they gave their advice and when they spoke to
18 Investigators about cases, would always be
19 looking at what else is there? Team leaders in
20 one to ones, when they were looking at cases and
21 how things were progressing, would also be
22 asking: what else are we looking at? What else
23 have we got?

24 It's just the nature of being
25 an Investigator is that you should pursue the
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1 avenues that you see as potentially giving you
 2 an answer that steers you in one direction or
 3 another.

4 **Q.** I mean, you said in an answer there that it was
 5 in the policies. We've seen evidence that the
 6 duties under the Code of Practice issued under
 7 the 1996 Act, to pursue all reasonable lines of
 8 in lines of inquiry --

9 **A.** Is this CPIA?

10 **Q.** -- yes -- didn't appear in Post Office policies
 11 for a decade?

12 **A.** But every Investigator from the time the Act
 13 came into force had a copy and was told they had
 14 to abide by it.

15 **Q.** So why wasn't it in policy for a decade?

16 **A.** I think it was probably an omission on the basis
 17 that they had a copy of the Act and they were
 18 expected to read the Act and abide by it.

19 **Q.** But having a copy of an Act, some parts of which
 20 applied to a Post Office Investigator, other
 21 parts -- many other parts of which did not --

22 **A.** So there would have been --

23 **Q.** Is not really a substitute, is it, for --

24 **A.** It may not be. I believe that when CPIA came in
 25 and we were looking at how to manage

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1 a technical expert to tell us because, if
 2 I walked into court and said there was no
 3 problem with the Horizon system, the judge would
 4 probably throw me out on the basis I didn't know
 5 what I was talking about.

6 **Q.** Can we turn to a different topic -- that can
 7 come down, thank you -- which is what Fujitsu
 8 told you and your relationship with Fujitsu.
 9 What was your relationship with Fujitsu like?

10 **A.** Personally, I didn't have much of one. I did
 11 some work with them to help promote them with
 12 financial institutions once, but I didn't have
 13 much of a relationship with Fujitsu at all. The
 14 relationship between us and them was very -- it
 15 was strained, in as much as they relied an awful
 16 lot on the contract and the commercial basis of
 17 the contract, which made it very difficult for
 18 us because, when you're gathering evidence, you
 19 don't expect to be faced with a bill or a block
 20 to say "You can't have that because it's not in
 21 the contract". So we had to manoeuvre around
 22 the contract in order to get what we needed.

23 **Q.** Would you say that your team's relationship with
 24 Fujitsu was therefore strained?

25 **A.** Yeah.

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1 prosecutions on that basis, there would have
 2 been ID circulars, to the effect of "This is
 3 what the Act means for you".

4 **Q.** Well, we are yet to discover those but your
 5 recollection is --

6 **A.** There was a Security intranet site and all the
 7 policies and all the circulars were kept on it
 8 and all Investigators would have received
 9 circulars as they were published via an email.

10 **Q.** So you would expect, where a suspect raised
 11 a potential Horizon cause of a shortfall, to
 12 pursue with utter diligence every reasonable
 13 line of inquiry to see whether there was
 14 substance in that because, if they'd been told
 15 about it in their training, if they'd got a copy
 16 of the Act and the guide in their hands and if
 17 it was on the intranet, they'd be under no doubt
 18 that that's what the law obliged them to do?

19 **A.** I think you're right, but I think you have to
 20 remember we were living in a world where, if we
 21 got a statement from Fujitsu that said the
 22 computer system worked correctly, then, as far
 23 as we were concerned, that avenue was closed
 24 because there was no problem with the machine.
 25 As Investigators, we would always be reliant on

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1 **Q.** Can we look, please, at POL00090437, and turn to
 2 page 87, please. This is an email from you to
 3 John Cole and Keith Baines; can you see that?

4 **A.** Yeah.

5 **Q.** "Analyst resource for Civil Litigation cases".
 6 You say:
 7 "... as discussed the other day, I do
 8 believe that this is a job that could be
 9 usefully conducted within our team for a number
 10 of reasons.
 11 "Positive stuff
 12 "Our Investigators routinely have to acquire
 13 and examine Horizon transaction data as part of
 14 their criminal investigation and prosecution
 15 work and are therefore familiar with not only
 16 looking at and analysing the data, but can also
 17 prepare their own witness statements in support
 18 of the evidence they uncover.
 19 "Because we also have strong ties with the
 20 Security and audit function within Fujitsu, we
 21 are also able to take witness statements from
 22 them in support of prosecution cases and could
 23 use the same links in support of Civil matters
 24 ... I believe our contract states they will
 25 provide support in this area", et cetera,

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1 et cetera, and you go on.

2 You're making a bid in this statement,
3 I think, to take on the investigations for civil
4 losses.

5 **A.** I think that's not quite how it was. It was
6 a case of --

7 **Q.** You tell us.

8 **A.** -- they -- we'd agreed that somebody needed to
9 do it, and it was identified that our team had
10 people who could routinely look at data and see
11 what was going on within the data, and had
12 a relationship with Fujitsu, and I believe we
13 were the only function that had that sort of
14 relationship with the people that would be
15 needed to write the witness statements.

16 So it was almost a case of I wasn't
17 necessarily keen to do it, but we were probably
18 the right people with the right level of
19 experience to do it. Notwithstanding I don't
20 think civil law is quite the same as criminal
21 law, so we would have had to do things slightly
22 differently, I believe.

23 **Q.** In those first couple of paragraphs, you're
24 pointing at strong ties or good links --

25 **A.** It says "Positive stuff".

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1 as we are in the throes of a 20% reduction,
2 unless I am able to keep two of the CM2 heads
3 ..."

4 Is that a reference to a grade of
5 Investigator?

6 **A.** That's the investigation standard grade, yes.

7 **Q.** "... that I am being asked to lose, I will not
8 be in a position to undertake this work. I have
9 asked Rod to speak to [Peter Corbett] about this
10 and see where we stand."

11 But you weren't identifying in this the kind
12 of difficult or strained relationship you
13 pointed us to?

14 **A.** I think this was something different to that
15 day-to-day working with relationship with
16 Fujitsu. This is about whether we were in
17 a position where we could set some bodies in
18 place to help with the civil litigation side of
19 the business.

20 Having had discussions with Keith Baines
21 about -- and it was probably more my team than
22 myself that experienced the difficulties around
23 the contract and getting information, I don't
24 know -- I can't remember if it mentions in this
25 email or elsewhere that, all the time we were

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1 **Q.** -- with Fujitsu.

2 **A.** I think there was probably a bit that said
3 "Negative stuff".

4 **Q.** Yes, we're going to go on to that in a moment
5 but this doesn't identify issues or problems
6 with Fujitsu?

7 **A.** Given the recipients of that email, I don't
8 think this was necessarily the place to put
9 that.

10 **Q.** Why?

11 **A.** Because Keith Baines knew that we had issues.

12 **Q.** So he knew it already?

13 **A.** I believe he did, yes.

14 **Q.** Can we scroll down, please, to "The sting in the
15 tail":

16 "It needs to be understood that as the
17 people running the system and its diagnostics,
18 only Fujitsu can provide evidence that the
19 system is working correctly. All we can do is
20 look at transactions, identify the dodgy ones
21 and provide some idea of what has gone on and
22 who did it, so you might find that there has to
23 be a lot of input from Fujitsu on this from
24 a witness statement and court attendance aspect.

25 "I have spoken to Rod about this issue and

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1 constrained by the number of requests that we
2 were allowed to have, we'd either have to reduce
3 the number of requests in prosecutions in order
4 to enable some of the requests for civil
5 litigation or find some other means of using the
6 data. So there was a lot more than just this
7 email. It was a bit of a discussion.

8 **Q.** Okay. Let's turn, then, to the requests made
9 for data from Fujitsu. You tell us in
10 paragraph 34 of your witness statement that your
11 role was to try to persuade the business leaders
12 that you needed better access to data:

13 "... in order to carry out our investigation
14 activity, as the decrease meant that
15 investigators that to be more mindful of how
16 much that they requested and it meant that with
17 the investigations we had ongoing we struggled
18 to get access to sufficient data in a timely
19 fashion."

20 Is that right?

21 **A.** Yes.

22 **Q.** Does it follow, then, that commercial
23 considerations had a significant impact on the
24 work of the Investigators?

25 **A.** I would say probably -- it would depend on how

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1 you looked at it. If you look at what happened
2 as a result of commercial decisions, yes,
3 because we didn't investigate as many things
4 because we had less Investigators. And the
5 constraints on ARQ requests meant that sometimes
6 we had to wait until the following month before
7 we could make a request because we'd run out.
8 And I think we did put a proposition together
9 that said how many investigations we thought
10 we'd be able to undertake, based on the ARQ
11 data.

12 **Q.** Did it have an impact -- ie commercial
13 considerations, did that have an impact on
14 investigations that you did commence?

15 **A.** I don't know. It would be hard to say. I don't
16 think we ever had to close a case because we
17 couldn't provide the evidence. But listening to
18 what's gone on in the years since, we probably
19 needed more data than we had.

20 **Q.** In the event that the ARQ request limit was
21 reached, what impact would that have on
22 a particular investigation?

23 **A.** It would have to wait until the next door opened
24 and we could get some more.

25 **Q.** So Investigators might pause their
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1 members of your team, in avoiding making
2 requests for data, so that limits were not
3 reached?

4 **A.** I think we probably sent out instructions to
5 people to be mindful of what they asked for and
6 to ensure that they only asked for ARQ data
7 where they considered there to be a need for it,
8 rather than using the data they picked up from
9 the offices when they visited.

10 **Q.** Can we look, please, at POL00114566, and
11 page 31, please. If we can look at the email
12 that starts halfway down the page, thank you.
13 There's an email from you to John Cole, Graham
14 Ward, and Tony Marsh with the subject "Horizon
15 data requests", and you say:

16 "As discussed, we are looking at achieving
17 50 requests per month for the remainder of the
18 year, at present end of December, but from what
19 you were saying potentially end of March.

20 "Can you just confirm that the incremental
21 step process is the only avenue open to us and
22 that we will have the required request numbers
23 using this process. If you could give us the
24 exact figures, it would be most helpful, as we
25 will use whatever requests are available.
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1 investigations and wait until the following
2 month --

3 **A.** Yes.

4 **Q.** -- or two months, or however long?

5 **A.** It was usually -- I don't think we ever rolled
6 over two months.

7 **Q.** Was the request to increase the availability of
8 data that you made to senior leaders within the
9 Post Office turned down on the basis of cost?

10 **A.** I don't recall. I don't recall. I think there
11 was something being built within the business at
12 the time, called POLMIS.

13 **Q.** Called, sorry?

14 **A.** It was called POLMIS, I think it was Post Office
15 Limited Management Information System, and there
16 was a lot of data being shared by Fujitsu
17 straight into that repository, and I think we
18 had a business objects front end, so we could do
19 some data analysis ourselves before going for
20 ARQ. But I think it came in towards the end of
21 my time and I'm not entirely sure what we did
22 and how we used it, but I know business objects
23 was a front end and we could do some analysis
24 via that route.

25 **Q.** Did you have to adopt a position, you and your
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1 "As you can imagine, with the changes taking
2 place in the business at present, we are in
3 increasing need of Horizon data and are still
4 avoiding asking for it where possible in order
5 to preserve our requests. This means that we
6 will inevitably be looking for further increased
7 access in due course and I will be preparing
8 a blueprint to gain direct access in the next
9 few weeks."

10 Firstly, what changes in the business were
11 you referring to at this point in July 2004?

12 **A.** So, we were coming to the end of legacy cases
13 that didn't involve Horizon and some of the
14 fraud types where Horizon data was far less
15 important, and more and more of what we were
16 doing was because Horizon was across the whole
17 network and everything we looked at involved
18 Horizon.

19 More and more cases were going to require
20 Horizon data and we were still in the throes of
21 learning about data and how data was useful in
22 the investigations. So our -- our view was
23 that, as time passed and more and more things
24 happened in Post Office and the business
25 changed, we would need more and more data in
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1 order to back up the evidential value of our
2 prosecutions.

3 **Q.** This refers to "avoiding asking for it wherever
4 possible". Was that an instruction that all of
5 the members of your team knew about: avoid
6 asking for ARQ data if at all possible?

7 **A.** So when we're talking to Investigators it's very
8 different to talking to these guys. So the
9 Investigators were told that you ask for ARQ
10 data if you require it but, if you can use the
11 data that you've picked up from the offices --
12 because we would pick up a month's worth of
13 Horizon transactions and event logs from the
14 offices when we visited.

15 So I wouldn't be expecting an investigator
16 to ask for ARQ data for that month, if he'd got
17 printouts that had all the information on,
18 albeit using a printer -- a printed report that
19 might be 7-foot long is a lot harder than using
20 an Excel spreadsheet on a computer disk.

21 **Q.** Hold on, though. This says your Investigators
22 are still avoiding asking for it wherever
23 possible.

24 **A.** So that's me talking to the business not what
25 I am telling the Investigators to do.

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1 That sort of information exchange didn't exist.

2 **Q.** If a postmaster did not raise calls that they
3 had made to NBSC or the Helpdesk, was that
4 material sought from either NBSC or the
5 Helpdesk?

6 **A.** I believe, as part of the evidence gathering,
7 that Investigators would look at calls to the
8 Helpdesk. They may -- if it was --

9 **Q.** Even if the suspect hadn't raised it?

10 **A.** I can't comment on every single case. I didn't
11 see every single case. I think, if there was
12 an investigation going on before the audit took
13 place, calls to the Helpdesk would probably have
14 been analysed before they went into the office.
15 With an audit shortage it's very much
16 a snapshot, so whether they would then look,
17 I don't know.

18 **Q.** Either because the postmaster had raised the
19 number of and nature of calls that they had made
20 to NBSC or the Helpdesk or because the
21 investigator, as a matter of routine, had sought
22 such data from NBSC or the Helpdesk, if there
23 were a series of calls where the postmaster was
24 complaining about the operation of Horizon,
25 would the Investigator seek ARQ data relating to

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1 **Q.** So was that not the truth, then?

2 **A.** So they're asking -- they're avoiding it
3 wherever possible but, what I'm saying to the
4 Investigators, if you need it, you've still got
5 to ask for it, which is why we were rolling the
6 requests month by month.

7 **Q.** Well, if the Investigators were told "If you
8 need it, go and get it", there's no problem?

9 **A.** So if you've got an Investigator investigating
10 an audit shortage or any other type of fraud at
11 the offices, the tendency would be "Right, let
12 me get a month's worth of ARQ data and have
13 look". If, in the view of the Investigator,
14 they're doing that for the sake of doing it then
15 don't use the ARQ data, use the month's reports
16 that you've got from the office. I'm just
17 trying to manage my resource and what I've got
18 access to.

19 **Q.** Were you aware of postmasters querying Horizon's
20 accuracy or raising Horizon-caused discrepancies
21 with the NBSC and the Helpdesk at this time?

22 **A.** Only where it was mentioned in a criminal
23 investigation. There was no sort of business
24 alert system that said "We've had 15 calls about
25 this this week and 17 about that last week".

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1 the events described by the postmaster?

2 **A.** Ordinarily, I think, yes, they would.

3 **Q.** Would this kind of avoiding asking for it
4 wherever possible --

5 **A.** That would be an exclusion.

6 **Q.** That wouldn't act as a brake or a prohibition on
7 them getting it?

8 **A.** No.

9 **Q.** We can see at the foot of the page there that
10 your email's a reply to Mr Ward's email of
11 12.36, setting out the number of ARQ requests.

12 **A.** So it's not a supply to Graham's email.

13 **Q.** Sorry?

14 **A.** I'd asked Graham for that information, in order
15 that I could go to John Cole with it. It wasn't
16 me replying to Graham, it was Graham providing
17 information --

18 **Q.** Okay, so if we just scroll up, sorry. You --

19 **A.** So I emailed John Cole --

20 **Q.** You forward it to Mr Cole, and you copy --

21 **A.** I copied Graham in and I copied in Tony Marsh
22 because, obviously, I was talking to Tony about
23 it.

24 **Q.** Why do you do that? Why are you copying
25 Mr Marsh in?

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1 **A.** Because I might need his influence later on if
 2 I needed to argue more strongly with the
 3 business that I wasn't getting what I wanted.
 4 **Q.** So his left, essentially?
 5 **A.** Yes.
 6 **Q.** If we just scroll down then, to see what Mr Ward
 7 had told you:
 8 "This year we have submitted the following
 9 ..."
 10 This is 2004, and he totals them up, and
 11 says, with a projection of 20 for August:
 12 "330, (our annual limit)."
 13 If we just scroll over the page:
 14 "Predicting how many we want isn't
 15 straightforward as people in our own team
 16 RLMs/NBSC/Legal Services are aware of the
 17 problems/restrictions in obtaining these logs
 18 and thus don't bother asking for them."
 19 Just stopping there, what you understand him
 20 to mean that Retail Line Managers, the Network
 21 Support Centre and Legal Services don't bother
 22 asking for ARQ data?
 23 **A.** That's what he's saying, yes.
 24 **Q.** Is that because the investigators were taking up
 25 the allocation and more than the allocation?

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1 **A.** I think that would probably apply to the Civil
 2 Litigation side because the prosecution side
 3 would never ask for data. They would ask us to
 4 get it. They would ask us to ask for it.
 5 **Q.** Why would Retail Line Managers be asking for ARQ
 6 data?
 7 **A.** I really don't know, unless they were doing
 8 an investigation into something that happened in
 9 a branch that they were trying to find help and
 10 provide support for.
 11 **Q.** Why would the NBSC be asking for ARQ data?
 12 **A.** I don't know, probably a similar reason to
 13 the --
 14 **Q.** This reads as if there's an otherwise limit need
 15 for them, in each of their capacities, to seek
 16 such data but they don't bother asking because
 17 they know that they won't get?
 18 **A.** I think you could probably argue that.
 19 **Q.** In criminal investigations, was a request for
 20 ARQ data delayed until a case had reached the
 21 Crown Court and plea was known?
 22 **A.** I don't think so. It may depend on the case but
 23 I don't think so because, if the Investigator
 24 considered the content of the ARQ data to be
 25 material in whether we should prosecute or not,

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1 **A.** Yes.
 2 **Q.** "If we had greater access I am sure that once
 3 the 'word' got around, we would use up whatever
 4 was available."
 5 **A.** I think it's a bit like building a motorway.
 6 **Q.** Just explain what you mean by that?
 7 **A.** You build a motorway, people fill it up with
 8 cars.
 9 **Q.** "That said, with a monthly limit of 46 I didn't
 10 have to turn many away, so I guess that having
 11 50 per month for the rest of this year would see
 12 us through until the contract is amended ... my
 13 guesstimate for the remaining year ... would be
 14 220", and he explains why.
 15 Did you understand Mr Ward to be informing
 16 you that some requests for ARQ data were
 17 actually being turned away?
 18 **A.** Um, I don't know that we actually turned them
 19 away. I think, if an RLM or NBSC wanted data,
 20 they were probably more cautious about asking
 21 for it. A bit like the Investigators: if you
 22 don't really need this, don't ask for it,
 23 because we can't get it.
 24 **Q.** Why would Legal Services be asking, ideally, for
 25 ARQ data?

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1 then we wouldn't wait to charge somebody and
 2 then go back and say, actually, this was
 3 a mistake, let's not bother.
 4 **Q.** What about not asking for the ARQ data in
 5 anticipation that you might get a plea, for
 6 example, to false accounting?
 7 **A.** Again, if the ARQ data was material to the case,
 8 then I would have expected to look at it first.
 9 **Q.** You would have expected the Investigator to have
 10 looked at it first?
 11 **A.** Yeah.
 12 **Q.** But this financial constraint was --
 13 **A.** It's not a perfect world. They may well have
 14 taken the view that "We'll put the case to Legal
 15 Services and if we prosecute and they plead,
 16 we've saved a request". The Investigators
 17 themselves weren't responsible for managing the
 18 requests; that was done by Casework.
 19 So I don't think Investigators, when they're
 20 looking at a case initially, would consider the
 21 ARQ requests in that way, other than the fact
 22 that they were told "Unless you really need
 23 this, don't ask for it".
 24 **Q.** Can we go to page 35, please. Scroll down,
 25 please. Can we see your email of 8 July to

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1 Keith Baines, again copied to Tony Marsh but
2 I think with Dave Pardoe added in?

3 **A.** Yeah.

4 **Q.** "Please see email below from Tony Marsh. Can
5 you please give an update what activity has been
6 undertaken with regard to gaining direct access
7 to Horizon data for use within the business.

8 "I believe Tony raised the idea of having
9 our own access to the audit data from within the
10 business via a terminal ... via which, we would
11 be able to obtain data for all parts of the
12 business and remove the need for us to make data
13 requests for Fujitsu."

14 Then the next paragraph:

15 "This issue has become considerably more
16 important recently, as Investigators are finding
17 it increasingly difficult to pursue criminal
18 cases without having access to audit data.
19 Defence teams have also identified this as
20 a means of delaying and in some cases
21 potentially ceasing prosecution activities and
22 as you can see from Tony's email this has meant
23 that we have had to increase our use of audit
24 requests to a point whereby we will run out at
25 the end of August, with potentially serious

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1 **MR JACOBS:** Thank you, Mr Utting we act for 156
2 subpostmasters, including Suzanne Palmer who
3 sits next to me to my left today.

4 You deal with Mrs Palmer at paragraphs 49 to
5 52 of your statement; do you recall?

6 **A.** I recall I read some papers and I think -- was I
7 the prosecution authority?

8 **Q.** Yes.

9 **A.** Yes.

10 **Q.** What you say is -- and I'll read it to you:

11 "I was not aware that Suzanne Palmer had
12 made any allegations about the functioning of
13 the Horizon system and none of the documents
14 disclosed to me suggest that she did."

15 Now, Mrs Palmer did raise allegations about
16 the functioning of the Horizon system from the
17 very outset of Post Office's investigation into
18 her case. An Investigating Officer at Post
19 Office who interviewed her, Ms Lisa Allen, who
20 interviewed her in February 2006, she's given
21 a witness statement to the Inquiry in which she
22 confirms that Mrs Palmer did raise Horizon
23 issues at the interview.

24 **A.** Right.

25 **Q.** So what I wanted to ask you is, given that it

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1 consequences thereafter."

2 Then you make the point that paper-based
3 cases are a dwindling number.

4 It's apparent from this escalation, this
5 reminder, this request for an update, that you
6 were finding it difficult to obtain approval
7 from Post Office Executives to increase the ARQ
8 data allowance.

9 **A.** Yes, from recollection.

10 **Q.** Did this financial constraint on securing data,
11 that was essential one way or another to the
12 viability and fairness of a prosecution,
13 continue?

14 **A.** I think it was always an issue for us.

15 **Q.** Did that continue until the end of your days in
16 the Post Office?

17 **A.** I believe so.

18 **MR BEER:** Mr Utting, thank you very much, they're
19 the only questions I ask you for the moment.

20 I think there are some questions? No?

21 Yes, one set of questions.

22 Then somebody wants to speak to me. So I'll
23 let Mr Jacobs ask questions first, sir, on
24 behalf of the Howe+Co Core Participants.

Questioned by MR JACOBS

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1 seems to have been accepted by the Investigating
2 Officer and by my client, do you accept that
3 what you say in your statement is incorrect when
4 you are saying that you don't think she raised
5 any Horizon issues?

6 **A.** It might be but I haven't seen any documents to
7 the contrary.

8 **Q.** All right. So if some who conducted the
9 interview and reads back that interview says
10 that she did, then that's --

11 **A.** That's fine, yeah.

12 **Q.** You accept?

13 **A.** Yeah.

14 **Q.** Good, okay. I just wanted to clear that up.

15 Now, there is no evidence that the Horizon
16 issues that Mrs Palmer raised -- and she said
17 that the system went down causing losses, which
18 she had to repay and there were other issues
19 when the system went offline. She says Horizon
20 generated error notices, she didn't agree with
21 those. There's no evidence that that was ever
22 investigated by Post Office, certainly no ARQ
23 requests.

24 As the designated prosecution authority,
25 which you were, is this something that you would

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1 have been made aware of? Would you have known
 2 this is a subpostmaster whose has raised Horizon
 3 issues but we haven't investigated?
 4 **A.** If it was in the investigation report, then
 5 I would have been aware. Honestly, I did --
 6 I have read the investigation report but I've
 7 got 2,000 pages.
 8 **Q.** Of course.
 9 **A.** If it was in the report that Ms Palmer had
 10 raised issues around the Horizon, then I would
 11 have been aware that she'd raised them. As
 12 I don't think it was in there --
 13 **Q.** No.
 14 **A.** -- the fact that the ARQ wasn't asked for would
 15 have probably not mattered to me because they
 16 hadn't mentioned it. I would -- I don't know if
 17 they can put the investigation report up on the
 18 screen and so I can look at it, but I don't
 19 know.
 20 **Q.** Well, we haven't got it now and we're a bit
 21 short of time but what I wanted to ask you is:
 22 do you think that this is something that should
 23 have been in the case summary and legal advice
 24 that was given to you as a designated authority?
 25 **A.** If it's material, yes.

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1 **A.** I can't comment.
 2 **Q.** Okay. You're here today obviously because
 3 there's been a national scandal. With the
 4 benefit of hindsight, do you accept that the
 5 prosecution authority role didn't really provide
 6 any scrutiny or oversight? That it was just
 7 a rubber-stamp exercise?
 8 **A.** As I said to Mr Beer earlier on, you can see it
 9 that way. I'm not sure that I did. I did read
 10 all the papers. I did have a view.
 11 **Q.** But you never challenged what you were being
 12 told. You didn't see yourself as a filter; you
 13 just endorsed --
 14 **A.** I saw myself as the person in the business that
 15 had to make the ultimate decision and, if I read
 16 the papers and the advice and couldn't find
 17 a reason to disagree with it, then I would have
 18 authorised the prosecution.
 19 **Q.** Okay. If I could move on. In your evidence
 20 this morning, you said that when the Post Office
 21 lost a case, there would be a report written by
 22 counsel --
 23 **A.** Yes.
 24 **Q.** -- which goes to the Criminal Law Team and then
 25 to the leadership team; is that right?

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1 **Q.** Now, you told Mr Beer this afternoon that you
 2 never said no to a prosecution.
 3 **A.** I don't believe I did, no.
 4 **Q.** You said:
 5 "I don't recall saying no, they were the
 6 experts and they would give the advice."
 7 Essentially, if we could just break that
 8 down, what you're saying is that, if
 9 a subpostmaster raised a Horizon issue and that
 10 Horizon issue had not been investigated but the
 11 legal advice that you received in your papers
 12 was to prosecute, you would have authorised it
 13 anyway because they're the experts?
 14 **A.** They would have had the same information as me,
 15 so they wouldn't have been aware either. So
 16 they would have advised prosecution, and yes,
 17 I would have authorised it.
 18 **Q.** So is it right that you took the view that you
 19 were a layman and it wasn't your place to
 20 disagree with the experts?
 21 **A.** In the majority of cases, yes.
 22 **Q.** Because in Mrs Palmer's case, there wasn't
 23 an investigation, and these points weren't
 24 raised in the report. They weren't looked at by
 25 the Post Office.

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1 **A.** I believe so, yes.
 2 **Q.** I want to ask you about that process in relation
 3 to Mrs Palmer's case. In January 2007, at
 4 Southend Crown Court, Mrs Palmer was acquitted
 5 by a jury and they took approximately ten
 6 minutes to acquit her. The jury asked
 7 a question, which was:
 8 "What was Mrs Palmer supposed to do if she
 9 didn't agree with the figures that the Horizon
 10 system produced?"
 11 So what we've got is not only Mrs Palmer but
 12 the jury raising this question about the Horizon
 13 system. The Post Office representatives at
 14 court were not able to answer the question.
 15 They were publicly floundering, something of
 16 a car crash. Do you think this is the sort of
 17 case that there should have been a review?
 18 **A.** Yes.
 19 **Q.** Were you aware -- having been the prosecuting
 20 authority, were you aware of any review being
 21 conducted or having been conducted?
 22 **A.** I don't know. Did you say January 2007?
 23 **Q.** January 2007.
 24 **A.** It was shortly before I left so any review may
 25 not have come through until after I'd gone.

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1 However, if the question was asked at court,
 2 I can't understand why the person or the
 3 representative -- I don't know who was there
 4 from the Post Office, but the answer to the
 5 question should have been you declare it and
 6 then you argue the toss with the business --
 7 **Q.** Well, we're going to --
 8 **A.** -- because that's the process.
 9 **Q.** We're going to ask questions of the Post Office
 10 Investigator who was present at court. But the
 11 Post Office were not able to answer that
 12 question --
 13 **A.** No.
 14 **Q.** -- and the jury acquitted her of all counts in
 15 ten minutes. You said that you think that is
 16 something that ought to have been the subject of
 17 a review?
 18 **A.** Well, I haven't done this for 17 years but, in
 19 my view, yes, there should have been a review.
 20 **Q.** Well, that's helpful. Finally, this was 2007.
 21 If, as designated prosecution authority, you had
 22 continued in that role or others had done so in
 23 2008 and 2009, and there had been a review of
 24 Mrs Palmer's case, and it was known amongst your
 25 colleagues that jurors were raising questions

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1 But I left in 2007. What people did after
 2 I left is really of no concern to me.
 3 **Q.** Well, what you've said is helpful and you have
 4 acknowledged that this is something that should
 5 have been dealt with.
 6 **A.** I think so, yes.
 7 **Q.** Okay. I'm just going to see if I have any more
 8 questions to ask.
 9 I'm going to ask you: Mrs Palmer was made
 10 bankrupt as a result of this. She's still
 11 bankrupt today. Do you, as you played a role in
 12 her case, have anything you'd like to say to
 13 her?
 14 **A.** When we did the job, we acted in what we thought
 15 was the right manner and pursued the case as
 16 professionally as we were able at the time.
 17 You're one of a number of people that have got
 18 off on the wrong end of this, and it's
 19 embarrassing for me to be part of the
 20 organisation that did that to you and, for that,
 21 I am sorry. But I'm not sure that what I say is
 22 going to help you at all because it's of not
 23 much value, is it, to be honest?
 24 **MR JACOBS:** Thank you. I haven't any further
 25 questions for you.

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1 and acquitting because Post Office was simply
 2 not able to deal with Horizon issues where
 3 subpostmasters had raised them and where there
 4 hadn't been proper investigations, would that
 5 have influenced your role and your job as
 6 a prosecuting authority?
 7 Would that have caused you or your
 8 colleagues to question what the advice that you
 9 received was?
 10 **A.** So I'm sitting here with the benefit of
 11 hindsight and, of course, I'm going to say of
 12 course it would.
 13 **Q.** Well, good, yes.
 14 **A.** But I don't live in that world any more. It's
 15 a long time since I was involved in those things
 16 and the Post Office is a very different place
 17 and it was a very different place when I left to
 18 what it was when I joined. But I'd like to
 19 think, as the person in charge of the
 20 Investigation Team -- and I considered my
 21 Investigators to be very professional and to be
 22 doing a good job -- I'd like to think that we
 23 learnt from issues like this and we moved
 24 forward with better information and better
 25 understanding.

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1 **SIR WYN WILLIAMS:** Any other questions?
 2 **MS PAGE:** Yes, sir, from me, please.
 3 **Questioned by MS PAGE**
 4 **MS PAGE:** Mr Utting, I also appear for a group of
 5 subpostmasters, including Mrs Adedayo and also
 6 Ms Skinner.
 7 The questions I'm going to ask you relate to
 8 the case of Janet Skinner and it's relating to
 9 a discussion which was had between you and the
 10 lawyer, the lawyer looking after her case, who
 11 seems to have spoken to you in your role as
 12 somebody who authorises and allows charges to go
 13 ahead.
 14 If we could bring up POL00048397, please.
 15 When it comes up, you'll see this is a phone
 16 note, and it's relatively short, so we can go
 17 through it. It says that it relates to Janet
 18 Skinner's case, which is in Hull Crown Court on
 19 5 January and, if we scroll down a little bit,
 20 we'll see that this note is actually made on
 21 5 January. So, evidently, the case was in court
 22 on this date.
 23 What it tells us is that J McF -- we know
 24 from other documents, Juliet McFarlane -- made
 25 this note and she says, at first, she spoke to

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1 prosecution counsel, who had added false
2 accounting to the indictment and she says that
3 will be faxed over and the indictment is lodged
4 at court:

5 "Defence wish to plead to False
6 Accounting -- loss not repaid. Counsel has
7 drafted [false accounting] in such a way that in
8 her opinion there should not be a problem with
9 the Confiscation proceedings."

10 Then she says this:

11 "Telephoned Tony Utting re acceptance of
12 plea to False Accounting, gave details
13 background to this case ..."

14 Pausing there, that suggests, doesn't it,
15 that you were needed in order to approve the
16 decision to accept pleas to false accounting; is
17 that right?

18 **A.** I believe so, yes. I believe that the lawyers
19 were not able to make those decisions for
20 themselves. They just needed, for want of
21 a better description, a rubber stamp from the
22 business.

23 **Q.** All right. So she's running that past you, and
24 then she goes on to say this:

25 "... gave details of background to this case
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1 this stage, so I wouldn't be -- I'm not
2 an expert in anything in that area, but if we've
3 gone to court and the defence have said the
4 false accounting we can accept because she
5 admits that she was falsifying the account, but
6 she didn't steal the money, and we had a risk to
7 the prosecution on the basis that a person who
8 worked at the same time as her was subsequently
9 arrested for theft, then obviously prosecution
10 for theft is not necessarily a great idea. But
11 if she's admitting to the false accounting and
12 we think we can prove the false accounting, then
13 we would accept it.

14 **Q.** Do you see that as disclosable?

15 **A.** Well, we're stood in the Crown Court. This was
16 a telephone call at Crown Court, so it would be
17 disclosable at that point.

18 **Q.** The information about the other thief at the
19 office, was that disclosable information, in
20 your view?

21 **A.** Yes.

22 **Q.** Yes.

23 **A.** I'm not sure, from this document, whether it was
24 disclosed or not.

25 **Q.** Did you say anything about making sure it was
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1 and other Thief at office. Would accept [false
2 accounting] in absence of contrary
3 instructions."

4 What we know from other papers is that there
5 was a temporary subpostmaster who came after
6 Ms Skinner and she was also arrested for theft.

7 **A.** I believe she was a member of staff at the
8 office whilst Ms Skinner was there.

9 **Q.** She had been a member of staff and then
10 subsequently she became temporary subpostmaster.

11 **A.** Yes, I recall that much from the papers.

12 **Q.** So you recall that much. Now, in this note, it
13 appears as if that's being presented as a good
14 reason to accept the lesser charge of false
15 accounting, yes, because it undermines the case
16 against Ms Skinner?

17 **A.** Yes.

18 **Q.** So it seems that both you and Ms McFarlane
19 recognised that as a feature that undermined the
20 prosecution case?

21 **A.** Yes.

22 **Q.** So what is jumping out at you about that? What
23 ought to happen with information that undermines
24 the prosecution case?

25 **A.** I'm not sure what -- because we're at plea at
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1 disclosed?

2 **A.** Well, it was -- we are stood in a Crown Court.
3 It's a bit late now; the defence knows.

4 **Q.** Well, let's just understand that. Are you
5 saying it's a bit late because you didn't think
6 it was disclosable once pleas were offered?

7 **A.** No, I think -- I don't know if it was disclosed.

8 I didn't see -- once I've authorised
9 a prosecution, I don't have any further
10 involvement with the case, unless I get
11 a telephone call such as this. At that point,
12 I still wouldn't know if it was disclosed.

13 I was having a discussion with a solicitor based
14 on some information she was giving me and
15 accepting the lesser charge. My involvement
16 went no further than that.

17 **Q.** So you didn't see it as part of your role, as
18 somebody in charge of Investigators, to make
19 sure that this was something that was disclosed
20 to the defence?

21 **A.** Like I've said, I don't know if was disclosed to
22 defence at that stage. I don't know, from this
23 document, who was talking to who about what.
24 All I know is that she rang me and said,
25 "There's a background to the case". If there's
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1 a background to the case and they already knew
 2 about the thief at the office, then my view
 3 would be that should have been disclosed.
 4 **Q.** From recollection, you did not make sure that it
 5 was disclosed?
 6 **A.** I don't think that I would need to make sure,
 7 when we're stood there accepting a plea.
 8 **Q.** If it transpires, as I believe it will, from the
 9 documents we've had so far, that it was not
 10 disclosed, do you recognise that as a pretty
 11 clear and terrible disclosure failing?
 12 **A.** If they knew about the thief in the office and
 13 the other person had been arrested prior to the
 14 case going to trial, yes.
 15 **MS PAGE:** Thank you. Those are my questions, sir.
 16 **SIR WYN WILLIAMS:** Thank you, Ms Page.
 17 **MR BEER:** Sir, there are no other questions.
 18 **SIR WYN WILLIAMS:** Thank you.
 19 Well, thank you for providing your witness
 20 statement and thank you for answering a good
 21 many questions during the course of today,
 22 Mr Utting. I'm grateful to you.
 23 Wednesday next; is that right, Mr Beer?
 24 **MR BEER:** Wednesday, yes, it is. It's sometimes
 25 difficult to remember which day of the week it
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1 is.
 2 **SIR WYN WILLIAMS:** Yes.
 3 **MR BEER:** But Wednesday is our next appearance.
 4 **SIR WYN WILLIAMS:** All right. I'll see you all at
 5 10.00 on Wednesday morning.
 6 **MR BEER:** Thank you very much, sir.
 7 **SIR WYN WILLIAMS:** Thank you.
 8 **(3.18 pm)**
 9 **(the hearing adjourned until 10.00 am**
 10 **on Wednesday, 22 November 2023)**
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