

Wednesday, 6 December 2023

(10.00 am)

DAVID POSNETT (continued)

Questioned by MR BEER (continued)

MR BEER: Good morning, sir, can you see and hear us?

SIR WYN WILLIAMS: Yes, thank you, yes.

MR BEER: Good morning, Mr Posnett.

THE WITNESS: Good morning.

Q. Yesterday we were looking at FUJ00152212. I wonder whether that can be displayed on the screen, please. It's page 8, please. If we scroll down, please, and look at paragraph 7.2, you remember this was the Fujitsu policy document, essentially --

A. Yes.

Q. -- concerning expert evidence as part of policy on the provision to the Post Office of litigation support?

A. Yes.

Q. You remember we established that it drew a distinction between evidence of fact and expert evidence?

A. Yes.

Q. I think you said yesterday that that wasn't

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the date range in question ..."

Yes?

A. Yes.

Q. "II. in order to check the integrity of records of transactions extracted by that query; "III. request and allow the relevant employees of Fujitsu Services to prepare witness statements of fact in relation to that query, to the extent that such statements are reasonably required for the purpose of verifying the integrity of records provided by ARQ and are based upon the analysis and documentation referred to in [another part of the document].

"IV. request and allow the relevant employees to attend court to give evidence in respect of the witness statements referred to in that paragraph III", that I've just read.

A. Yes.

Q. Did you know about this policy?

A. I don't recall this policy. On this particular one, as you say, on the circulation was Sue Lowther. I may have received it, I may not, but don't recall it.

Q. You see the way that this treats requests for ARQ data. If we just scroll up a little bit, it

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something of which you were particularly aware at the time?

A. That's correct.

Q. Okay. You weren't aware of the process that the document said needed to be undertaken, the change control procedure, if it was a request for expert evidence?

A. Yes, I don't recall that.

Q. Can we look, please, at FUJ00002264. This is a similar policy document concerning security management or the Security Management Service. You'll see that the distribution includes Sue Lowther at the Post Office?

A. Yes.

Q. Can we turn, please, to page 14, and look at the foot of the page, please, under "Litigation Support":

"Where Post Office submits an ARQ in connection with litigation support, at the Post Office's request Fujitsu shall, in addition to conducting that query ..."

Then look at B:

"subject to the limits [above, which I'm not going to read] analyse:

"I. the appropriate Service Desk records for

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says that, "in addition to conducting the query" at B1, analyse the appropriate records for the date range in question.

A. Yes.

Q. When you were making ARQ requests, did you know that Fujitsu regarded itself as under an obligation, subject to the limits set out to analyse Service Desk records?

A. I don't remember.

Q. You were the person responsible for obtaining material from Fujitsu by way of ARQ requests?

A. Yes.

Q. Can you try and help us as to what you understood Fujitsu's obligations were in terms of when you were making an ARQ request, whether it was necessary for them to analyse Service Desk records?

A. The only thing I can recall is that Investigators would request Horizon data and myself or one of the Casework Team would submit that request via an ARQ to Fujitsu. I don't recall all these specific details on this document.

Q. Do you remember receiving analysis of Service Desk records, as opposed to -- sorry, analysis

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1 on the one hand versus a summary of, on the
 2 other, or the provision of the Service Desk
 3 records still further?
 4 **A.** I don't recall that. The only thing I do recall
 5 is receiving disks with transaction and --
 6 transaction logs and event logs.
 7 **Q.** Yes, they're from the system.
 8 **A.** Yes.
 9 **Q.** Here we're talking about when an ARQ request is
 10 made, the facility or obligation, it doesn't
 11 express what triggers it, to analyse Service
 12 Desk records. That's something else. You
 13 remember the helpdesks?
 14 **A.** The helpdesks, yes.
 15 **Q.** So this is saying, when you ask for ARQ data,
 16 there was an add-on, essentially, of an analysis
 17 of Service Desk records?
 18 **A.** Yeah, I don't recall that.
 19 **Q.** If we scroll down a little bit further, please,
 20 under III it reads "request and allow the
 21 relevant employees of Fujitsu to prepare witness
 22 statements of fact in relation to that query",
 23 which seems to refer to transaction queries,
 24 rather than the helpdesk stuff.
 25 **A.** Yeah.

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1 **A.** I would have expected that but I don't recall
 2 reading many of the witness statements anyway.
 3 I think they might have come in and just been
 4 transferred on to the Investigator.
 5 **Q.** So you were postboxing them essentially?
 6 **A.** Yes, and when I was the Casework Manager this
 7 process had been around since, well, 2000,
 8 I think, since Horizon came in. So it was, as
 9 far as I was aware, bedded in and business as
 10 usual. I didn't go reinvent the wheel because
 11 I thought that's what the process was.
 12 **Q.** You'll see the sentence continues there:
 13 "to the extent that such statements are
 14 reasonably required for the purpose of verifying
 15 the integrity of records provided by ARQs ..."
 16 So it seems to suggest that the statement
 17 needed to, in some cases, speak to the integrity
 18 of the records produced as a result of the ARQ.
 19 **A.** Yes.
 20 **Q.** What analysis did you understand had been done,
 21 if any, on the request to produce an ARQ or
 22 produce ARQ material by Fujitsu?
 23 **A.** I don't recall what analysis was done and
 24 I probably wouldn't have understood it anyway.
 25 **Q.** Did you expect some analysis to have been done?

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1 **Q.** Can you recall any discussion or debate over
 2 a change in approach between witness statements
 3 that spoke to ARQ data being expert evidence, as
 4 against witness statements that spoke to ARQ
 5 data that were witness statements of fact?
 6 **A.** No, I don't recall.
 7 **Q.** What did you expect the witness statements that
 8 Fujitsu supplied, which spoke to the ARQ data,
 9 to contain?
 10 **A.** Exhibit the actual data that they'd provided,
 11 ie the disks with transaction and event logs,
 12 and I think there was a standard statement that
 13 they used that it was tailored to the relevant
 14 office and time frame, and commentary on whether
 15 the system at a particular branch at
 16 a particular time was working properly.
 17 **Q.** Did you expect the witness statements to contain
 18 sufficient analysis to support a case that
 19 Horizon was functioning correctly and with
 20 integrity?
 21 **A.** Sorry, can you repeat that?
 22 **Q.** Yes. Did you expect the witness statements to
 23 contain sufficient analysis or material to
 24 support a case that Horizon was functioning
 25 correctly or with integrity?

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1 **A.** I would expect some analysis to be done, if
 2 they're commenting that the system was working
 3 fine at the time at a particular branch, and so
 4 on.
 5 **Q.** So if I'm an Investigator and you've got a book,
 6 and I say to you "Mr Posnett, please produce the
 7 book", you can write a witness statement, which
 8 says, "I, David Posnett, produce the book as my
 9 exhibit DP1", yes? Or I can say to you
 10 "Mr Posnett, can you please produce the book and
 11 provide some analysis of what's in it, the
 12 accuracy of what's said and the truthfulness of
 13 it"?
 14 **A.** Yes.
 15 **Q.** That would be a very different witness
 16 statement, wouldn't it?
 17 **A.** It would, yes.
 18 **Q.** What variety of witness statement, when you were
 19 essentially the ARQ manager, were you expecting
 20 from Fujitsu? The former type, just producing
 21 the data, or the latter type containing some
 22 analysis of it?
 23 **A.** Again, from recollection, I thought it was both,
 24 ie the production of the ARQ data and commentary
 25 on whether the system was working.

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1 Q. I think you told us yesterday that you yourself
 2 wouldn't have been able to identify whether in
 3 the data provided there was sufficient
 4 information to understand whether a transaction
 5 had or had not been completed by the system or
 6 by the subpostmaster themselves --
 7 A. Yes.
 8 Q. -- and I think you said yesterday that you
 9 yourself thought that not many Investigators
 10 would be able to understand that distinction,
 11 and interrogate the data for themselves to see
 12 whether it applied?
 13 A. That's my personal opinion, yes.
 14 Q. Thank you. That can come down, thank you. Now,
 15 where we stopped yesterday -- that was just
 16 going back over some material that I'd thought
 17 it necessary to ask some additional questions.
 18 Where we stopped yesterday was FUJ00155399,
 19 and if you scroll down, please, we looked at the
 20 bottom half of this page yesterday, which was
 21 an email from Wendy Warham to Sue Lowther and
 22 David X Gray about the security incident; do you
 23 remember?
 24 A. Yes.
 25 Q. The December 2007 report of an occurrence that

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1 might be witness statement.
 2 A. Yes.
 3 Q. Then a little later:
 4 "Spoke to DP [at 2.30 on the same day]. He
 5 had liaised with Legal -- they said [or they
 6 want] the checks for the 400,000 ARQs to be made
 7 and results returned. Their brief will need to
 8 contact counsel in the event that we find any
 9 abnormalities.
 10 "Discussed [witness statement] -- will
 11 review and talk again at a later date."
 12 Yes?
 13 A. I think -- yeah, I think that's what it says.
 14 Q. You've got no memory of this?
 15 A. I've got no memory of that, no.
 16 Q. Okay, but what it appears has happened is that
 17 Penny Thomas has drawn your attention to this --
 18 and I think you agreed yesterday -- security
 19 incident that was serious. You've had
 20 a conversation saying, "I need to get back to my
 21 Legal team within Post Office" --
 22 A. Yes.
 23 Q. -- and you call back or she calls back later in
 24 the day with three things: the 400,000 ARQs
 25 needed to be checked; if there are

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1 went back to May 2007. Then if we just scroll
 2 up, please, on the same day, 7 January, at
 3 10.54, we can see that Penny Thomas sent you
 4 that email, yes?
 5 A. Yes.
 6 Q. "Please find attached note sent by my senior
 7 management this morning. We need to discuss
 8 urgently.
 9 "I attach a proposed witness statement."
 10 I don't think we've actually got that note
 11 but it doesn't matter for present purposes.
 12 Then if you look at the handwritten notes,
 13 that's not your writing, is it?
 14 A. It's not, no.
 15 Q. We assume that it's Penny Thomas'. It records,
 16 I think, two conversations with you --
 17 A. Yes.
 18 Q. -- and you say in your witness statement you
 19 don't recall the conversations?
 20 A. I don't remember the incident at all.
 21 Q. No. At the first of them, on the same day,
 22 "Spoke to DP", which we assume is you, and
 23 I think this reads:
 24 "He will liaise with his legal team and
 25 advise requirements and comments for WS", which

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1 abnormalities, then their brief, which I assume
 2 means -- I think that says "their brief", their
 3 something -- will need to contact counsel if
 4 there are abnormalities; and then the draft
 5 witness statement will be reviewed and talked
 6 about at a later date. Yes?
 7 A. Yes.
 8 Q. Then if we go to later in the day, what
 9 happened, FUJ00155400, and look at page 3,
 10 please. Just if we look at the bottom of
 11 page 2, thank you. So this is at 3.54 on the
 12 7 January, same day, re the security incident.
 13 You contact Rob Wilson about the issue; yes?
 14 A. Yes.
 15 Q. We looked at some of this yesterday, underneath
 16 paragraph 2, you cut in, starting with the words
 17 "In December 2007", that which was in the
 18 Fujitsu email that we've just looked at, yes?
 19 You say at paragraph 2:
 20 "The following additional paragraphs have
 21 been inserted (page 7). I personally do not see
 22 the need for these if there are no problems
 23 identified with the data relating to the case in
 24 question. Why inform anyone about a problem
 25 we've had within the network, but possibly only

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1 at one branch, if it bears no relation or
2 relevance."
3 You essentially sought Mr Wilson's advice;
4 is that right?
5 **A.** Yes, so the last paragraph on there, "I'd be
6 grateful if you could consider the above",
7 ie should they include the above in statements
8 from now on.
9 **Q.** So should this additional language be included
10 in the standard form witness statements --
11 **A.** Yes.
12 **Q.** -- afterwards to alert people to this bug that
13 has been found?
14 **A.** Yes.
15 **Q.** If we go to page 2, please, and then scroll
16 down, Mr Wilson replies a few minutes later:
17 "Dave,
18 "Thanks for both of your emails. So far as
19 the addition is concerned my view is that if we
20 are sure that there are no incidents then there
21 is nothing undermining that will need to be
22 flagged up by the defence. The incident will
23 have no relevance to our cases and as such could
24 only lead to fishing expeditions if we added
25 anything into the standard statement."

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1 if there are no problems identified with the
2 data."
3 **A.** If there are no problems identified with the
4 data.
5 **Q.** Do you say to Fujitsu "Please carry on trying to
6 identify problems with the data"?
7 **A.** I thought somewhere within those documents they
8 were going to look into the issue that they've
9 outlined.
10 **Q.** What would you mean, if there are no problems
11 identified with the data? What do you mean by
12 that; what did you mean by that?
13 **A.** Well, I can only go by the documents I'm looking
14 at now. I can't remember. But once they'd done
15 their examination or assessment, if it became
16 evident that there were no discrepancies or
17 impact on people's balances, et cetera, then it
18 wasn't an issue.
19 **Q.** I see. I understand. So it's whether it has
20 an impact on a balance --
21 **A.** Yes.
22 **Q.** -- that's important?
23 **A.** That's probably what I would have thought at the
24 time.
25 **Q.** Why did you not consider that this revelation of

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1 Then if we scroll up, please. You forward
2 that chain on to Penny Thomas, and you say:
3 "To note the emails below.
4 "I would say Business As Usual re witness
5 statements ie don't include the two additional
6 paragraphs on the last page.
7 "If any issues materialise in due course, we
8 can address them -- suggest the ARQs for these 4
9 cases are assessed first."
10 Then page 1, please. Scroll down, please.
11 Ms Thomas distributes that chain within Fujitsu,
12 saying:
13 "[The Post Office] clearly do not want the
14 specific details of this incident included in
15 the witness statement."
16 Yes?
17 **A.** Yes.
18 **Q.** That's a fair reflection of the exchange between
19 you and Mr Wilson, isn't it?
20 **A.** Yes, but I would say, subject to their looking
21 into the problem and what came out of that.
22 **Q.** Do you actually say that? If we just go back to
23 the chain, please, and look at page 3 first.
24 You say:
25 "I personally do not see the need for these

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1 a bug in the Horizon estate may be relevant to
2 individual prosecutions simply because it
3 revealed that a bug could exist within Horizon
4 that went undetected by Fujitsu.
5 **A.** Because, as I mentioned yesterday, I think all
6 systems have issues. That was my view at the
7 time. I don't remember it, and it seems as
8 though Rob Wilson's concurred with my view.
9 **Q.** But the information that had been reported to
10 you showed, firstly, that there had been
11 an unseen problem that meant that part of
12 a balancing transaction had not been recorded in
13 the local message store, agreed?
14 **A.** Yes.
15 **Q.** It meant, secondly, that the system had not
16 picked that up, that the system for finding
17 faults and identifying faults had not picked
18 that up --
19 **A.** Yeah.
20 **Q.** -- and there had been some considerable delay?
21 **A.** Yes.
22 **Q.** The issue had occurred from May 2007 onwards,
23 I think. It was said to have been fixed in
24 November 2008 and was not being addressed until
25 this email exchange of January 2009?

16

1 A. Mm.

2 Q. Did that not suggest to you that there were
3 problems with Horizon or may be problems with
4 Horizon, which were not being adequately or
5 promptly communicated to you?

6 A. When I read this now, yes. I mean, in a strange
7 way I'm reassured that Fujitsu actually
8 identified this and flagged it up. But I can't
9 remember it. I can only go by what I'm reading
10 and it may well have been "We need to look at
11 all of these ARQs that could have been impacted
12 by this issue and then take it from there".

13 Q. Was the existence of a bug, which could
14 undermine the integrity of data, not in itself
15 significant, more generally, to the integrity of
16 data being produced by Horizon?

17 A. I would say, at the time, no would have been my
18 thought, given the email I've written but I've
19 forwarded it on for concurrence or a review by
20 Rob Wilson.

21 Q. If we scroll back up to page 2, please, you say:
22 "If any issues materialise in due course" --

23 A. Yes.

24 Q. -- "we can address then."
25 What did you expect to be done, going

17

1 Q. -- "then we might need to do something"?

2 A. I don't remember it but I agree with that
3 summary.

4 Q. Did the Post Office conduct any, to your
5 knowledge, independent analysis of the fix that
6 Fujitsu said they had applied back in November
7 2008, to see whether it had worked?

8 A. I don't remember but, again, the first email in
9 this chain was from Wendy Warham to Sue Lowther,
10 the Head of the Information Security at the Post
11 Office and, underneath the paragraph that says,
12 "Further action", it's mentioned "Education to
13 ensure that this type of incident is raised as
14 a major incident".

15 I mean, I don't know what that process was.

16 Q. That's a slightly different thing, I think,
17 Mr Posnett. That's an internal Fujitsu point
18 that people need to be educated not to sit on
19 a problem and instead need to escalate it into
20 a major incident, so there isn't a delay between
21 2007 and 2009.

22 A. Yeah, but my view is the email went from Wendy
23 to Sue Lowther, so I wasn't even part of that
24 initial email. I don't know but I'm assuming
25 that, because it went to Sue Lowther, she's got

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1 forwards, to see whether any issues materialise
2 in due course.

3 A. What did I do, sorry?

4 Q. What did you expect to be done --

5 A. Well --

6 Q. -- to see whether any issues materialised in due
7 course?

8 A. Okay, so on the first page of this document,
9 with Penny Thomas' handwritten notes, Wendy
10 Warham, who is writing to Sue Lowther, we need
11 to -- it states, and I quote:

12 "We need to work with POL to recheck the
13 ARQs and reconfirm the data integrity during the
14 period of May '07 to November '08. Penny will
15 do this."

16 So that's what I thought Fujitsu were going
17 to be doing, rechecking the ARQs during that
18 time period.

19 Q. So "if any issues materialised in due course"
20 does not mean "if any further problems with this
21 bug come out in the future", it means "the
22 checks that Fujitsu have already said they are
23 going to undertake, if issues arise from those
24 checks" --

25 A. That's what --

18

1 her on processes to follow or to escalate things
2 or notify people of this incident but I don't
3 know.

4 Q. But your view was we needn't disclose this in
5 a witness statement, that this has happened in
6 our witness statements?

7 A. I don't think that was my view at the time.

8 Q. Well, you say, "I would say Business As Usual re
9 witness statements, ie don't include the two
10 additional paragraphs".

11 A. So don't include.

12 Q. Yeah, "we don't need to mention this in our
13 witness statements"?

14 A. Subject to what comes out of Fujitsu's
15 enquiries.

16 Q. Did you agree with Mr Wilson that, if you did
17 include this, if we scroll down to see his
18 actual language, it could only lead to fishing
19 expeditions?

20 A. I would turn that around and say Rob Wilson
21 seems to have agreed with my comments
22 beforehand.

23 Q. How did you know at this time that the incident
24 has no relevance to your cases?

25 A. We didn't know at this time.

20

1 Q. So prosecutions were continuing?
 2 A. Yes.
 3 Q. The standard witness statement was going out
 4 without the additional paragraphs alerting
 5 people?
 6 A. Well, I think on here it said that there were
 7 four outstanding. I think they were paused,
 8 from what I'm reading, until they'd looked into
 9 this.
 10 Q. The prosecutions were paused?
 11 A. Not prosecutions; the submission of the witness
 12 statement.
 13 Q. Oh, I see, so the prosecutions continued but the
 14 witness statement was not signed off?
 15 A. That's my understanding, from this.
 16 Q. Can we go on, please. FUJ00155409. If we
 17 scroll down, please, this is five days later,
 18 12 January 2009. This looks like an internal
 19 Fujitsu chain, and I don't think you're ever
 20 copied in to it but I just want to ask you some
 21 questions on what you knew about it. This the
 22 checking process that I think you envisaged, and
 23 Alan Holmes says to Penny Thomas:
 24 "I have compared your ARQs with the event
 25 data constrained as follows:

21

1 window?
 2 A. Yes.
 3 Q. Where did you get that information from, that
 4 that was the nature of the checking that was
 5 being undertaken?
 6 A. From the previous emails.
 7 Q. Which email?
 8 A. So the first email in those documents.
 9 Q. FUJ00155399?
 10 A. Yes. So the email --
 11 Q. If that can just be brought up, please.
 12 A. So underneath the paragraph headed "Impact",
 13 again:
 14 "We need to work with POL to recheck the
 15 ARQs and reconfirm the data integrity during the
 16 period of May '07 to November '08 -- Penny will
 17 too this."
 18 Q. I was concentrating on the ten-minute time
 19 window between 7.00 and 7.10 that we just read
 20 about.
 21 A. Again, I can't remember this. I don't
 22 understand what Riposte is or ringers that have
 23 been mentioned, that's for Fujitsu. I looked at
 24 it quite simply: there was an issue identified
 25 and they were going to recheck the ARQs during

23

1 "1. Only the specific Riposte timeout
 2 event.
 3 "2. Events between 1 May '07 and
 4 30 November '08.
 5 "3. Events logged between 7.00 and 7.10.
 6 "4. Events logged by Counter 1."
 7 Then if we scroll up, please, and a little
 8 further. Thank you.
 9 Again, internally to Fujitsu conversation
 10 between Steve Denham and Penny Thomas on the
 11 email:
 12 "To update you -- Dave Posnett rang me
 13 yesterday to ask the status of this exercise
 14 (which he was including in hits internal
 15 reporting). I told him it was still [work in
 16 process] and that we were hoping for results
 17 later this week/early next week", et cetera.
 18 Were you aware that the checks that Fujitsu
 19 were carrying out were limited only to the
 20 specific incident and to a particular date
 21 range.
 22 A. That was my assumption, yes.
 23 Q. That they were, in the words of the email we
 24 just looked at, constrained to the specific
 25 timeout event and limited to a ten-minute

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1 that period and come back to me with their
 2 results that would hopefully be relayed in
 3 layman's terms.
 4 Q. You were part of a Casework Team at this time?
 5 A. I'm not sure I was because, if you look at my
 6 email, the title on my email is "Dave Posnett,
 7 Fraud Risk Manager". So, at this stage, I'd
 8 moved --
 9 Q. You'd moved on?
 10 A. -- from Casework Manager into fraud risk but --
 11 Q. Why were you dealing with it?
 12 A. Well, that's a good question. I think, because
 13 I'd been in Post Office for so long, I was quite
 14 often asked to carry on with this or get
 15 involved with that, "Dave, do you know people
 16 who can assist so and so?" Yeah, I wouldn't say
 17 I was used and abused but I was given extra
 18 duties above my day job at that stage.
 19 Q. Who took over from you as Casework Manager in
 20 the Casework Team?
 21 A. So I think it was Jason Collins, he was one of
 22 the Assistant Casework Managers. I think he
 23 became --
 24 Q. Got promoted?
 25 A. Yeah.

24

1 Q. Okay.

2 A. Until it moved up to Salford in Manchester and
3 it was a different team.

4 Q. But you'd moved department at this time?

5 A. I'd moved to be Fraud Risk Manager, yeah, and
6 I think what has happened is I've still
7 maintained an element of the relationship with
8 Fujitsu.

9 Q. What technical expertise did you bring to bear
10 to be able to apply a critical eye to what
11 Fujitsu were telling you?

12 A. None.

13 Q. This says, "We need to work with POL to recheck
14 the ARQs".

15 A. Yes.

16 Q. What did POL do to work with Fujitsu?

17 A. Again, I don't remember it but I think it was
18 purely Fujitsu looking at the ARQs and then
19 relaying the results to the Post Office.

20 Q. In this kind of thing, was there a facility to
21 bring in technical expertise within the Post
22 Office to say, "Look, we've got a supplier who
23 has identified this problem: Fujitsu. They may
24 have been slow in telling us about it. It
25 affects prosecutions, this is serious -- or it

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1 "We are pleased to advise that our analysis
2 of the data covering 1 May to 30 November has
3 been completed.

4 "The event logs have been checked for all
5 data provided to Post Office as a result of the
6 195 ARQs which fall within the time frame. 27
7 instances of concern were identified. All
8 instances have been fully analysed and we can
9 confirm that the locking was caused by
10 contention between the end of day process and
11 a Riposte checkpoint being written. No
12 transactions or balancing activities carried out
13 at the branches were affected.

14 "The standard witness statement has been
15 reviewed and is attached. No reference has been
16 made to the locking issue but minor revisions
17 have been made."

18 Yes?

19 A. Yes.

20 Q. Was it your understanding from this that Fujitsu
21 had effectively checked all potentially affected
22 cases and confirmed that this issue had not
23 caused a transaction error in any case or
24 an error in balancing in any case?

25 A. Yes, on reading these documents that, I think

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1 potentially affects prosecutions, this is
2 serious. We need to apply a critical eye to
3 what they've done to solve the problem and to
4 check the extent to which the data is afflicted
5 by this problem in terms of financial
6 reliability".

7 Was there that kind of help available within
8 the Post Office?

9 A. I don't know, but I would say, yes, there
10 probably were people who could have assisted in
11 that respect. But there's two key things you've
12 mentioned there: one is somebody who is expert
13 at IT that could look at this. Well, as I say,
14 the initial emails went to Sue Lowther, who was
15 the Head of Information Security. So either she
16 would deal with it or know people who could look
17 at it and the other element of that, you've
18 mentioned prosecutions, I've relayed this to
19 from, the Head of Criminal Law, so, in some
20 ways, both of those areas are covered off.

21 Q. You thought that was covered off?

22 A. I -- yeah, not from recollection, but from what
23 I'm seeing, yes.

24 Q. Can we look at FUJ00155421 and look at the big
25 email in the middle, Penny Thomas emails you:

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1 would have been my understanding.

2 Q. They say that no reference has been made to the
3 locking issue in the witness statement, yes?

4 A. Yes.

5 Q. So that's Fujitsu deciding for themselves
6 whether a bug in the system needed to be
7 included by way of disclosure in a witness
8 statement, correct?

9 A. That's what it looks like, unless they're
10 looking back at myself and my --

11 Q. The exchange --

12 A. Yeah.

13 Q. -- between you and the lawyer, saying, "We agree
14 me don't think this needs to be included"?

15 A. Yeah.

16 Q. But all three of you -- you, Mr Wilson and
17 Fujitsu -- appear, would you agree, to have
18 approached the issue on the basis of does it
19 affect branches, rather than issues of whether
20 it said something about the existence of a bug
21 in the system and the ability of the system to
22 identify the bug?

23 A. I would agree with that, yes.

24 Q. Not by reference to the time taken for
25 disclosure of the issue to the Post Office by

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1 Fujitsu?
 2 **A.** Yes.
 3 **Q.** Thank you. That can come down.
 4 When you're considering this disclosure
 5 issue, what test do you apply in deciding
 6 whether this needs to be disclosed to
 7 a defendant or not?
 8 **A.** Well, it's not for me to decide whether that
 9 should have been disclosed or not. That's why
 10 I referred it to Rob Wilson.
 11 **Q.** You expressed a pretty clear view --
 12 **A.** It was a --
 13 **Q.** -- "business as usual, let's get on with
 14 things"?
 15 **A.** Well, it wasn't business as usual because --
 16 well, I don't actually remember it but that, to
 17 me, is a specific problem that's been flagged
 18 up. That was my view.
 19 **Q.** What --
 20 **A.** If it happened today and you asked me my view,
 21 I'd say, well, we need to declare that or
 22 disclose it.
 23 **Q.** Why would your view be different?
 24 **A.** Because, at the time, without remembering it,
 25 and I mentioned yesterday, that all systems,

29

1 suspected offender was wearing a red bobble
 2 hat -- yes -- and you were in possession of
 3 material which suggested that the eyewitness on
 4 a previous occasion said that the offender was
 5 wearing a blue bobble hat, would you have to
 6 disclose that?
 7 **A.** Yes.
 8 **Q.** That's pretty obvious, isn't it, because it's
 9 directly about the issue concerned, yes?
 10 **A.** Yes.
 11 **Q.** What about if, in those proceedings, unrelated
 12 to the witness' identification of the suspect,
 13 he had misidentified somebody else on a previous
 14 occasion, had said that the suspect was wearing
 15 a green skirt on one occasion and then on
 16 a different occasion said she was wearing
 17 an orange skirt? It had nothing to do with the
 18 identification of the bobble hat wearing
 19 offender.
 20 **A.** Yes.
 21 **Q.** Would you have to disclose that?
 22 **A.** Personally, I would. As I mentioned yesterday,
 23 the only criticism I ever received was
 24 disclosing too much information. I would say
 25 that, if that particular person has got

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1 computer systems, have their glitches, issues,
 2 et cetera. That I thought was a localised
 3 one-off that had come to me, there's been email
 4 exchanges, Fujitsu have looked at it.
 5 I notice on -- well, I think we've just gone
 6 through there, that I've chased them for
 7 a response so I knew that, potentially, it could
 8 be serious. I've -- I would imagine, at the
 9 time, my major worry would be if they came back
 10 and said, "Oh, 30 or 40 of these ARQs are
 11 branches, it has caused a discrepancy in their
 12 balancing". And alarm bells would have been
 13 ringing and we'd have had to look at those
 14 in-depth, you know, to see whether people had
 15 been prosecuted, et cetera.
 16 As it was, they came back with there were no
 17 financial discrepancies, which was probably my
 18 focus at the time, but I understand now, given
 19 what we all know, that, in hindsight, yes,
 20 perhaps that should have been flagged up and
 21 raised as another bug.
 22 **Q.** To take it away from the issue of a computer
 23 system, imagine a case involving, I don't know,
 24 ID evidence. If you're relying on an eyewitness
 25 in a criminal prosecution who says that the

30

1 a history of getting it wrong, then yes, its
 2 relevant to the case.
 3 **Q.** Even though it's got nothing directly to do with
 4 the identification of the suspect on this
 5 occasion?
 6 **A.** Rightly or wrongly, I used disclose every little
 7 bit of paper, post note, et cetera, so no one
 8 could come to me and say, "You haven't retained
 9 this", or whatever.
 10 **Q.** That's because it goes to the liable of the
 11 piece of evidence that you're relying on, in
 12 that case, the eyewitness?
 13 **A.** Yes, I would retain and reveal any -- anything
 14 I had in relation to a case. As I said, the
 15 lawyer who contacted me said you only need to
 16 disclose relevant things. I wasn't talking
 17 about thousands of sheets of paper but that was
 18 the way I worked.
 19 **Q.** Thinking back, do you think you applied that
 20 approach to evidence used by computers,
 21 ie something not directly relevant to the
 22 allegation that you're making, but something
 23 which tends to suggest that the evidence that
 24 you might be relying on is less than reliable?
 25 **A.** I don't know -- I can't remember any instance

32

1 like that where I was responsible for
2 disclosure.
3 **Q.** Can we move on, please, to another aspect of
4 requests for ARQ data. POL00107817, please.
5 Can we start by looking at page 3, please. This
6 is in the context of the Seema Misra case. We
7 can see an email from Mr Longman, the
8 Investigator, to the Fraud Team, of 14 July
9 saying:

10 "Can you please assist with the following
11 three points ..."

12 Can you help with the generic Fraud Team
13 email address. What was that?

14 **A.** So the Casework Team, myself, two assistant
15 managers and admin staff, we had a team email
16 address, namely the Fraud Team.

17 **Q.** Okay, so this refers to the part of the Casework
18 Management Team?

19 **A.** Yes.

20 **Q.** Okay. Then 1:

21 "Andy Dunks of Fujitsu is requiring as
22 a witness in this trial ...

23 "2. The defence will be calling their own
24 expert to analyse the Horizon data as the
25 defendant is now claiming that some of the loss

33

1 period 13 June '05 to 14 January '08, together
2 with a covering witness statement.

3 **Q.** What cover should the witness statement provide?

4 **A.** I don't understand that bit but it's a witness
5 statement that includes the production of the
6 transaction log data during that time frame.

7 **Q.** Should it just produce them, a bit like earlier,
8 if you remember my book example. It says
9 "herewith book, my exhibit DB1"?

10 **A.** Yes.

11 **Q.** Or should it analyse them?

12 **A.** Yes.

13 **Q.** Which of those two?

14 **A.** Both. They should produce the logs and, if
15 they're verifying in the witness statement that
16 the system was working correctly, that would
17 have involved, I would imagine, some sort of
18 analysis.

19 **Q.** Okay let's see what happened to it, if we go to
20 the top of the page, we can see that this is
21 forwarded to you --

22 **A.** Yes.

23 **Q.** -- by Tony Jeffery; was he one of your
24 caseworkers?

25 **A.** Yes.

35

1 in this case is caused by errors with Horizon.

2 Therefore, I will need transaction log that
3 covering the period 30 June 2005 to 14 January
4 2008, together with a covering witness
5 statement."

6 **A.** So this is an example of when an Investigator
7 requests a witness statement, not the Casework
8 Team.

9 **Q.** Yes, and the investigator is requesting the
10 Casework Team to get a witness statement?

11 **A.** Yes.

12 **Q.** Yes? Does that reflect the fact that
13 Investigator shouldn't be liaising directly with
14 Fujitsu; it had to be routed through you?

15 **A.** Yes.

16 **Q.** Your team?

17 **A.** The team, yeah.

18 **Q.** The request there for a covering witness
19 statement, in relation to data for that
20 two-and-a-half-year period, what, reading this,
21 would you expect if you were to pass that on to
22 Fujitsu, the witness statement to contain? It's
23 rest to by the Investigator as a covering
24 witness statement.

25 **A.** So it should cover transaction log data covering

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1 **Q.** "Please see paragraph 2."

2 That's the one we've been concentrating on,
3 the request for ARQ data?

4 **A.** Yes.

5 **Q.** If we look at page 2, please, and scroll down.
6 You reply directly to the Investigator and you
7 say:

8 "Due to the size of the ARQ request I cannot
9 authorise Fujitsu to proceed at this stage.

10 This equates to approximately 31 ARQs. We have
11 an annual allowance of 670 ARQs, so the defence
12 request represents quite a chunk of our quota."

13 Just stopping there, had the defence
14 actually requested anything?

15 **A.** Can we --

16 **Q.** Go back to page 3?

17 **A.** Yes, please.

18 **Q.** Scroll down paragraph 2.

19 **A.** So --

20 **Q.** Isn't it the Investigator saying, "I will need
21 the data"?

22 **A.** Well, yes, the defence will be calling their own
23 expert to --

24 **Q.** But they're not asking for anything though, are
25 they, according to this?

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1 A. No, but it's part of his paragraph "The defence
2 will call in their own expert, as the defendant
3 is now claiming that some of the loss in this
4 case is caused by errors in Horizon, therefore,
5 I will need" --

6 Q. So it's the Investigator, the prosecution needs
7 the data?

8 A. Yes.

9 Q. Why did you turn it into a defence request in
10 your email? Go back to page 2.

11 A. I think because the defence will be getting
12 an expert and it looks as though it's now citing
13 Horizon. So perhaps, at the time, I've assumed
14 it was a defence request.

15 Q. "... so the defence request represents quite
16 a chunk of our data. Also, we can only request
17 60 ARQs per month, so this Defence request could
18 be detrimental to other Prosecution requests.

19 "We have a contract with Fujitsu to acquire
20 ARQs for our prosecution cases, and we pay for
21 these. We do assist where we can and where
22 requests are reasonable in terms of our quota,
23 eg police, other parts of the business, small
24 defence requests, etc.

25 "For 'lumpy' defence requests, we can obtain

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1 A. Yes.

2 Q. You say in the second paragraph that you do
3 assist with "small defence requests". Small
4 defence requests are okay. Where did that come
5 from?

6 A. I don't think it was a policy or anything.
7 I think it's --

8 Q. What's a "small defence request"?

9 A. Something that is unlikely to impact on
10 Investigation Managers making requests.

11 Q. You then say in the third paragraph that it's
12 essentially the defence's job to pay for this
13 data or get the court to order the Post Office
14 to undertake the work. Agreed?

15 A. That's what it says in that paragraph.

16 Q. Was that your view generally?

17 A. Um --

18 Q. If ARQ data is required and it doesn't fit
19 within our contractual arrangements with
20 Fujitsu, the defence have got to pay for it?

21 A. I would say not, because of the very first line
22 and the very last line of that email. "I cannot
23 authorise Fujitsu to proceed at this stage", is
24 the first line, and the bottom line is "Can you
25 consider and seek views/input from our criminal

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1 a quote from Fujitsu for the work, which will
2 then sit outside our quota. Defence can then 1)
3 pay up, 2) seek legal aid and pay up, 3) cancel
4 the request, or 4) seek authority from the court
5 to insist that the request is carried out.

6 "Aside from the costs and our quota, another
7 reason for this approach is because many cases
8 plead guilty at the 11th hour and/or nothing is
9 found by 'experts' to challenge the Fujitsu
10 data -- the usual attempts to muddying the
11 waters.

12 "Can you consider and seek views/input from
13 our criminal lawyer in the case. Happy to
14 discuss if need be."

15 Yes?

16 A. Yes.

17 Q. You told us yesterday that you determined the
18 parameters of ARQ requests by reference to what
19 the Investigator wanted, didn't you?

20 A. Yes.

21 Q. This shows that you didn't determine the
22 parameters of ARQ requests by reference to what
23 the Investigator wanted, doesn't it?

24 A. So has he not requested logs for a date range?

25 Q. And you said no.

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1 lawyer in the case."

2 So whatever my thoughts or views are, the
3 lawyer in the case would overwrite me, as it
4 were.

5 Q. Would that be Mr Singh?

6 A. I think it was Mr Singh on this case.

7 Q. How did you find him as a lawyer?

8 A. Yeah, okay, as far as I'm aware.

9 Q. Competent and hard working?

10 A. Well, I didn't sit with him, so I don't know how
11 hard working he was but I had no issues.

12 Q. So he was the decision maker, was he, on the
13 extent of an ARQ request that went back to
14 Fujitsu?

15 A. If he was the lawyer in the case, then yes.

16 Q. Did you not understand yourself that it was for
17 the Investigator and the prosecutor in law to
18 undertake all reasonable lines of inquiry and,
19 if it was necessary, obtain data and information
20 from a third party?

21 A. Yes. What I would say to that is, again,
22 although I don't remember this, it's -- I'm not
23 aware of the full details of the case. I'm
24 looking after the Casework Team and it's up to
25 the lawyer to say, "Tough, we need these" for

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1 whatever reason, and then we'd do our best to
 2 get it. I mean --
 3 **Q.** You're not doing your best to get it, are you?
 4 You're being obstructive to the getting of it,
 5 aren't you?
 6 **A.** No, no, I said if the lawyer insists we need it,
 7 then we'd do our best to get it. On this
 8 particular incident, I don't know whether --
 9 I've asked a Senior Manager, you know, and
 10 they've said get a quote, or, I don't know
 11 whether I've spoken to the Casework Team to find
 12 out how many cases have been raised in the last
 13 week or so there was also a Credence issue.
 14 So that was my view at that time, given
 15 a set of circumstances but it's not my decision,
 16 ultimately, to say, yes, or no or to say no to
 17 the production of logs.
 18 **Q.** If it's not your decision --
 19 **A.** Ultimately.
 20 **Q.** -- ultimately, why are you saying all of this?
 21 Why not just forward the email and say,
 22 "Jarnail, over to you"?
 23 **A.** Because the Investigator has e-mailed me, I've
 24 responded to the Investigator --
 25 **Q.** And I'm asking you why you've responded to the
 41

1 going to be used up in this case, it means that
 2 an Investigator who might want ARQs might have
 3 to wait until the next month to request. So --
 4 **Q.** Does that reflect your mindset at the time, that
 5 the starting point is the contract we've agreed
 6 with Fujitsu, rather than the starting point is
 7 the indictment that we have preferred against
 8 Mrs Misra and the date range in that?
 9 **A.** I think the ARQ, from the conception of Horizon,
 10 was more geared to the Investigators. As time
 11 went on, yes, it became important for defence,
 12 as well. But I -- being honest, I think it was
 13 primarily for Investigation Team at the
 14 beginning.
 15 **Q.** If we just scroll up, please, and again, please.
 16 We see that at 12.02 Mr Longman duly forwards
 17 that chain to Jarnail Singh.
 18 **A.** Yes.
 19 **Q.** At the end of the first paragraph:
 20 "I have tried to order the data for the time
 21 Mrs Misra was subpostmaster (3 years) but as you
 22 can see from the email from Dave Posnett there
 23 are a number of issues.
 24 "Please could you advise counsel and inform
 25 what action to take."
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1 investigator saying, "Defence should pay up"?
 2 **A.** Well, I don't know why because I don't remember
 3 this incident but --
 4 **Q.** Why should the defence pay up for data that had
 5 led to the creation of the very records that the
 6 prosecution was relying on to prove its case?
 7 **A.** Yeah. I don't know.
 8 **Q.** Well, can you try and help us? Was this the
 9 state of mind of you and your Casework
 10 Management Team, that if we've got to get data
 11 to prove the accuracy of the very records that
 12 we rely on to prove our case, ie the Horizon
 13 records, it's for the defence to pay up?
 14 **A.** I don't think that was the mindset. I mean, the
 15 previous paragraph says we do assist where we
 16 can and where requests are reasonable, in terms
 17 of our quota, et cetera. So it's not a case
 18 that the barriers have gone straight up. But
 19 it, you know, may well have been at that time
 20 that three years' worth of data just seemed
 21 excessive, hence, can you seek the views or
 22 input from the criminal lawyer?
 23 **Q.** Why would three years seem excessive?
 24 **A.** Because if we're only allowed 31 ARQs a month --
 25 sorry, 60 ARQs a month, and 31 of those are
 42

1 Yes?
 2 **A.** Yes.
 3 **Q.** So that's midday on the 4th?
 4 **A.** Yes, so I've responded to Jon, to liaise with
 5 the lawyer, and Jon has responded to the lawyer
 6 asking him to get the view of counsel.
 7 **Q.** Yes. Can we go, please, to FUJ00154846, thank
 8 you, and page 3, please. We were previously
 9 looking at midday on the 4th, we're now at 11.00
 10 in the morning on the 5th. You email Penny
 11 Thomas, saying:
 12 "Request for information [in the Misra
 13 case].
 14 "As discussed, please note the email below."
 15 If we scroll to page 3, please, and a bit
 16 further, we can see the original email from
 17 Mr Longman to you with paragraph 2 saying:
 18 "... I need transaction data for that
 19 two-and-a-half-year period."
 20 Yes?
 21 **A.** Yes.
 22 **Q.** Back up to page 2, please -- sorry, back up to
 23 page 3, my mistake.
 24 "As discussed [Penny], please see the note
 25 below. In respect of paragraph 2, I have not
 44

1 authorised an ARQ -- suggest the defence pay for
 2 this, either independently or via legal aid or
 3 they can challenge at court. As such, and as
 4 per our RFI process, could I ask for a quote
 5 from Fujitsu as to how much this would cost if
 6 it sat outside the ARQ contract. I would be
 7 grateful for a speedy response as I need to
 8 relay back to our Investigator and our criminal
 9 lawyer."

10 So you hadn't authorised the ARQ request,
 11 had you?

12 **A.** Um --

13 **Q.** Line 1.

14 **A.** Yes -- no -- well, you're correct.

15 **Q.** So it was your decision, to not authorise or to
 16 authorise.

17 **A.** At this time, on this occasion, yes. Again, the
 18 bottom line of that paragraph "be grateful for
 19 a speedy response as I need to relay back to our
 20 investigator and our criminal lawyer".

21 **Q.** So is the summary that you'd said no without
 22 knowing how much it would cost?

23 **A.** I would say yes, yeah.

24 **Q.** You're saying that you would suggest that the
 25 dense pay for this, either from their own money

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1 case, and an awful lot of ARQs have been
 2 requested.

3 **Q.** So you'd be suspicious. Well, they haven't
 4 requested any. The defence at this moment
 5 haven't requested any on the information you've
 6 got. Your Investigator has asked for it?

7 **A.** The investigator has asked for it, it would
 8 seem, based on what has happened in the case.

9 **Q.** Yes, but he's not saying "the defence have
 10 requested", he's saying, "I'm requesting"?

11 **A.** Yeah, I mean, I don't know whether I had
 12 conversations with him at the time, and his --

13 **Q.** What, that said that this is, in fact, a defence
 14 request, despite the terms of my email?

15 **A.** Well, the email implies to me that because
 16 defence experts are getting involved and it's
 17 switched from staff thefts, that's why Jon is
 18 making the request.

19 **Q.** Would that be something that operated on your
 20 mind, that this is a defendant just messing
 21 around, switching defences and, therefore, if
 22 they want to mess around and switch defences,
 23 they can pay for the privilege?

24 **A.** That -- again, that possibly would have been on
 25 my mind. I don't know. But the key thing for

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1 or via legal aid, or it can be challenged in
 2 court. Where did that come from, that the
 3 defence had to pay?

4 **A.** I don't know, other than, perhaps at the time,
 5 there were occasions where defence had paid or
 6 other parts of the business had paid because it
 7 was the Security Team's budget. I don't know.

8 **Q.** Do you understand that the data you were seeking
 9 was data that was necessary to prove the
 10 accuracy of the records relied on in the
 11 prosecution?

12 **A.** I know that now.

13 **Q.** What did you think this was at the time?

14 **A.** I can't remember, I don't remember the incident,
 15 so I don't know what I thought at the time.

16 I wouldn't have known the ins and outs of the
 17 case. It may have been reading through
 18 documents that it's -- you know, it's suddenly
 19 switched of staff members that stole the money
 20 and then it's shifted to Horizon could be the
 21 problem.

22 **Q.** What's the relevance of that?

23 **A.** Well, if it's changed so quickly from staff
 24 thefts to Horizon, it just seems a very quick
 25 change, without knowing the ins and outs of the

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1 me there is liaison with the lawyer and, if the
 2 lawyer had come back and said, "Tough, we need
 3 this", then we would have done our best to get
 4 it.

5 **Q.** Can we look, please, at page 2 to the reply,
 6 a letter on the same day from Penny Thomas, if
 7 we just scroll down a little bit further. Yeah,
 8 Penny Thomas to you:

9 "In response to your request [costs will be]
 10 £5,800."

11 Yes?

12 **A.** Yes.

13 **Q.** Yes, so was that, in your view, a prohibitive
 14 cost?

15 **A.** Prohibitive?

16 **Q.** To proceeding with the request?

17 **A.** I don't know what I thought at the time.
 18 I would imagine that would be relayed to the
 19 lawyer to factor in to his decision making.

20 **Q.** Let's have a look. FUJ00154851. Look at
 21 page 3, please, letter of 14 August 2009 to
 22 Mr Longman:

23 "Here is a letter which I have written to
 24 the defence and copied to counsel for your
 25 information."

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1 If we go to page 4, please, to the
2 solicitors, 14 August:
3 "I understand from Prosecuting Counsel on
4 the last occasion Defence Counsel asked for
5 Horizon data for the period during which your
6 client was subpostmistress at West Byfleet sub
7 post office. As you may be aware the Horizon
8 system is a product of Fujitsu Limited and the
9 Post Office has purchased this system from
10 Fujitsu, in the same way as any other company
11 would purchase goods or services for its
12 business. Other than that, Fujitsu is not in
13 any way an associated company of the Post
14 Office.

15 "The request has been put to Fujitsu and
16 a reply has been received by a person who
17 liaises with this company."

18 I think that's a reference to you.

19 "The data will take some 6-8 weeks to
20 produce. Additionally your client made 107
21 calls to the Horizon Helpdesk during her period
22 of tenure which equates roughly to 2-3 calls per
23 month."

24 Then the next paragraph:

25 "The retrieval of data by Fujitsu is not
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1 arrange three years worth of data, the legal
2 executive has gone back via this letter, asking
3 them to explain exactly, you know, what and why
4 it's needed or why it's been requested.

5 **Q.** Did you like the stuff about the waste of time
6 and money for the late guilty pleas?

7 **A.** I wouldn't say I liked it but I think there was
8 an element of my recollection.

9 **Q.** In fact, you'd already got a quote, £5,800?

10 **A.** Right. That was before the letter went.

11 **Q.** Yeah.

12 **A.** Right.

13 **Q.** You're pulling a face --

14 **A.** Well, I --

15 **Q.** -- which the transcript doesn't pick up.

16 **A.** Sorry. I don't remember the incident.

17 **Q.** No.

18 **A.** So I haven't got my head round dates --

19 **Q.** But do you see what's happened here? Initially,
20 the Investigator has said, "I need this data".

21 **A.** Yes.

22 **Q.** You have said the criminal lawyer needs to
23 advise but there are these obstacles to giving
24 it or getting the data.

25 **A.** Yeah.

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1 a free service. It is very expensive and
2 depends upon the amount of data which has been
3 retrieved, which is why you are requested to be
4 very precise. At that stage a firm quotation
5 could be obtained and Counsel will be asked to
6 give further advice as to disclosure and payment
7 for the service. The Post Office will not
8 underwrite the cost if counsel considers the
9 data irrelevant. You will of course be aware
10 that the same system operates throughout the
11 country, and was not particular to your client's
12 sub post office.

13 "I have set out the matter above quite
14 clearly because in the past many thousands of
15 pounds have been spent on obtaining this type of
16 data subsequent to which a late plea of guilty
17 is entered tendered which means that the
18 exercise has been a waste of time and money."

19 Then if we go to page 1, please. You say to
20 Mr Longman:

21 "Good letter -- I like it."

22 Yes?

23 **A.** Yes.

24 **Q.** What did you like about the letter?

25 **A.** I think that, rather than saying, yes, we'll
50

1 **Q.** At the same time you've gone off to Fujitsu and
2 said, "What's the cost?" They've provided you
3 with the cost, and then a letter has gone back
4 putting the burden on the defence to justify the
5 time period.

6 **A.** Mm-hm.

7 **Q.** Why not just say, "We've obtained a quotation,
8 the data is available. It would cost £5,800"?

9 **A.** I don't know. Perhaps I didn't forward that
10 quotation to Phil Taylor who wrote the letter.
11 I don't know.

12 **Q.** Would you agree that the documents that we've
13 just looked at make it difficult for this
14 subpostmaster to seek to challenge Horizon data?
15 They make their task harder?

16 **A.** Yes.

17 **Q.** I think you've said that part of your reasoning
18 would be because this defendant might plead
19 guilty at the 11th hour?

20 **A.** Did I put this defendant.

21 **Q.** No.

22 **A.** No. Right. I think at the time there were
23 instances where people, not just audit cases but
24 many other types of cases, entered guilty pleas
25 at the 11th hour.

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1 **MR BEER:** Thank you, sir. It's 11.15 now. That
2 might be an appropriate moment to break until
3 11.30.

4 **SIR WYN WILLIAMS:** Yeah, of course. Can I just
5 clarify, by the time of the exchange of this
6 email, these emails, am I right in thinking that
7 Mrs Misra had, in fact, pleaded guilty to false
8 accounting?

9 **MR BEER:** Yes.

10 **SIR WYN WILLIAMS:** So it was clear that the issue
11 was a contest about theft? It was in that
12 context that this debate was going on?

13 **MR BEER:** Correct.

14 **SIR WYN WILLIAMS:** Yeah. All right, thank you.
15 11.30, yes.

16 **MR BEER:** 11.30, yes. Thank you.

17 (11.16 am)

18 (A short break)

19 (11.32 am)

20 **MR BEER:** Sir, good morning, can you see and hear
21 us?

22 **SIR WYN WILLIAMS:** Yes. Thanks.

23 **MR BEER:** Mr Posnett, can we turn to look, please,
24 at a document that was prepared at about the
25 same time as the exchanges that we were just

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1 the burden of proof is measured as a balance of
2 probability."

3 Then, moving on:

4 "Prosecutions [at the foot of the page] are
5 then subject [over the page] to strict rules and
6 regulations within the legal system so the
7 entire process is both thorough and fair."

8 Then you deal with Case Study 1, the theft
9 of £200,000 at Orford Road sub post office, and
10 you conclude at "Summary/Points of Interest", if
11 we scroll down, you say:

12 "In my opinion, some Post Office
13 prosecutions where Horizon analysis is
14 requested, are merely an attempt to muddy the
15 waters or hope that the case is dropped. This
16 particular case involved £7,100 of taxpayers'
17 money being spent on analysis, yet the results
18 of that analysis were not disputed (or possibly
19 even referred to) at the trial. There was also
20 no attempt to call Fujitsu individuals as
21 witnesses and give live evidence. The
22 Investigator in the case also recalls that
23 the Horizon kit wasn't removed -- it was used by
24 the incoming subpostmaster with no problems
25 reported."

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1 looking at in Ms Misra's case, POL00141142, and
2 look at page 2, please, and scroll down. We can
3 see an email there from you to David X Smith of
4 5 October 2009, "Horizon Integrity --
5 Prosecution Case Studies". You say:

6 "Dave,

7 "As requested.

8 "In order address the concerns about the
9 integrity of Horizon, I have prepared two case
10 studies."

11 What do you recall as to the reasons why you
12 were corresponding with Mr Smith in October 2009
13 over concerns about the integrity of Horizon?

14 **A.** I don't recall this at all.

15 **Q.** You were, we see from the sign-off block here,
16 a Fraud Risk Manager at the time. Why would you
17 have been liaising with Mr Smith over Horizon
18 integrity issues?

19 **A.** I would imagine someone's tasked me with
20 undertaking these two case studies.

21 **Q.** You say:

22 "It should be noted that these cases were
23 prosecuted whereby the burden of proof is
24 measured beyond the reasonable. This differs to
25 suspension and termination of contracts, where

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1 Then Case Study 2, if we scroll down:

2 "Again, this suggests [at the foot of the
3 page] an attempt to muddy the waters or hope
4 that the case is dropped. There is no real
5 concern about the Horizon system, as
6 demonstrated by the defendant pleading guilty."

7 Then the conclusion of your email under
8 "General":

9 "Where Horizon data is used as evidence in
10 a prosecution case, Fujitsu are contracted to
11 provide a witness statement and give live
12 evidence if requested. A significant amount of
13 data is provided by Fujitsu, with only a few
14 witness statements (not necessary when
15 defendants plead guilty) and rare attendance at
16 court to give evidence. Defendants have a right
17 to question the integrity and data of the
18 Horizon system, yet this avenue is not really
19 pursued -- one would think that if someone is
20 innocent, then they would pull out all the stops
21 to disprove the allegations against them. Post
22 Office prosecutions have a high success rate
23 (approximately 95%), suggesting that cases are
24 as watertight as they can be."

25 So can you help us here, why were you

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1 writing this memo?

2 **A.** I don't know, other than someone has tasked me

3 with providing two case studies.

4 **Q.** You told us yesterday that it was management,

5 the top of the organisation, telling you, lower

6 down, that everything was fine with Horizon.

7 This is the other way round, isn't it? This is

8 you telling management that everything is fine

9 with Horizon and it was a reliable basis for

10 successful prosecutions, wasn't it?

11 **A.** Yes.

12 **Q.** The message was coming up here from you to them,

13 not down?

14 **A.** Yes.

15 **Q.** Why would the provision of ARQ data in

16 prosecutions muddy the waters?

17 **A.** As mentioned before, I believe there were cases

18 where ARQ data was obtained and experts couldn't

19 disprove or counter that there were things with

20 Horizon and --

21 **Q.** Can you remember the cases in which experts were

22 instructed?

23 **A.** I can't, no. Then people pleaded guilty. You

24 know, obviously we know --

25 **Q.** Plead guilty to what?

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1 was, I think, the same.

2 **A.** Yeah.

3 **Q.** That may have been a different issue, I'm not

4 going to go into that with you. Were you aware

5 that, within the Post Office, it was known that

6 some people pleaded guilty at the last minute to

7 false accounting, in circumstances where the

8 Post Office would offer no evidence, not proceed

9 with the allegation of theft?

10 **A.** Yes, I think that was the case.

11 **Q.** Was there a view that those people were doing so

12 in order to seek to secure a more lenient

13 sentence?

14 **A.** Possibly, yes.

15 **Q.** You say that, if you were innocent, you would

16 pull out all of the stops to disprove the

17 allegations --

18 **A.** Yes.

19 **Q.** -- and that people requesting ARQ data, or some

20 of them, were doing so to muddy the waters?

21 **A.** Yes.

22 **Q.** Did that colour your view of the extent to which

23 the Post Office should cooperate in the

24 provision of ARQ data?

25 **A.** Yes, if it was an excessive amount.

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1 **A.** To whatever charges they were charged with.

2 **Q.** Did you understand the difference between

3 a theft allegation and a false accounting

4 allegation?

5 **A.** Yes.

6 **Q.** Did you understand that some people pleaded

7 guilty, often at the door of the court, to false

8 accounting?

9 **A.** Some people pleaded guilty to false

10 accounting --

11 **Q.** Yes, often at the door of the court?

12 **A.** I didn't catch that last bit?

13 **Q.** Often at the door of the court?

14 **A.** So what does that mean?

15 **Q.** At the last minute. On the day of the trial,

16 yes?

17 **A.** Yeah, yeah.

18 **Q.** Did you understand which was the more serious,

19 did you have a view as to which was the more

20 serious allegation: theft or false accounting?

21 **A.** I think people viewed theft as more serious but,

22 from recollection, and I may be wrong, I think

23 the sentencing for false accounting was similar

24 to theft. And when I was --

25 **Q.** The maximum permissible sentence of imprisonment

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1 **Q.** Who was the judge of whether it was excessive or

2 not?

3 **A.** Ultimately, it would have been the lawyers.

4 **Q.** You mean the criminal lawyer --

5 **A.** Yes.

6 **Q.** -- for the prosecution?

7 **A.** Yes.

8 **Q.** Thank you. That can come down. We'll come back

9 to that later.

10 I think it's right that you assisted in the

11 obtaining of witness statements from Fujitsu in

12 proceedings against subpostmasters.

13 **A.** When you say "assisted" --

14 **Q.** Yes.

15 **A.** -- I don't think I assisted.

16 **Q.** Did you participate in any way in the obtaining

17 of witness statements from Fujitsu?

18 **A.** No, I don't think so, other than requesting

19 witness statements.

20 **Q.** Okay, so you requested them?

21 **A.** Yes.

22 **Q.** A number of emails from Fujitsu employees that

23 the Inquiry has got, including from Penny Thomas

24 and Andy Dunks, show that they sent the witness

25 statements to you.

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1 **A.** Yes, in the Seema Misra case Andy Dunks has sent
 2 me a witness statement "Can you read this and
 3 tell me what you think?" And I think I've said,
 4 "It seems okay to me but I'll pass it on to the
 5 Investigator", because he was the officer in the
 6 case.

7 **Q.** I'm not going to go through all of them now; I'm
 8 just going to list them for anyone looking at
 9 this in the future. Cases in which Ms Thomas
 10 and Mr Dunks shared draft witness statements
 11 with you can be found at FUJ00122454,
 12 FUJ00122457, FUJ00122470, FUJ00122474,
 13 FUJ00122476, FUJ00122478, FUJ00122487,
 14 FUJ00122489, FUJ00122513, FUJ00122563 and
 15 FUJ00122540. Was it part of your role to
 16 comment on the substance of the witness
 17 statements provided by Fujitsu?

18 **A.** I don't think so. I mean, I don't recall
 19 getting involved in that way, although we've
 20 obviously looked at that security incident and
 21 the witness statement. But I don't think I got
 22 involved in their witness statements.

23 **Q.** Did you see it as your role to guide or advise
 24 Fujitsu employees in relation to what should be
 25 included or excluded from their witness

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1 statement to me and then I would send it on to
 2 Jon Longman as the Investigator. He's put
 3 "Dave, please have a look at the attached, can
 4 you let me know if it's okay". I don't
 5 recollect this or being asked about any witness
 6 statements, but I think, in my response above,
 7 I'm -- I've given a view but it's ultimately up
 8 to the Investigator to comment on the witness
 9 statement.

10 **Q.** Let's look at how this developed, if we scroll
 11 up, please. You reply to Andy Dunks at Fujitsu,
 12 now copying the Investigator, Mr Longman, in.

13 **A.** Yes.

14 **Q.** "Andy,
 15 "Statement looks fine to me, though I've
 16 copied Jon Longman for his info. My only query
 17 would be that the log of 107 calls ..."
 18 That's a reference to Mrs Misra calling the
 19 Helpdesk 107 times:
 20 "... may need to be produced as evidence or
 21 be disclosed as unused material. If produced as
 22 evidence then it could be incorporated in your
 23 statement now or produced in a 'further to'
 24 statement later. I'll let Jon comment on this
 25 to, as the court may be happy as it is?"

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1 statements?

2 **A.** No, because, as I say, when I was Casework
 3 Manager, the process had been in place for seven
 4 or eight years. So, as far as I was concerned,
 5 that was the process, it had been long bedded
 6 in.

7 **Q.** Can we look, please, at POL00052222 and can we
 8 look, please, at page 4 at the bottom. Can we
 9 see an email of 22 June from Andy Dunks to you,
 10 with the subject "Witness statement for West
 11 Byfleet, Horizon Helpdesk calls", and he says:
 12 "Hi Dave,
 13 "Please have a look at the attached [witness
 14 statement] for West Byfleet [Horizon Helpdesk]
 15 calls logged. Can you let me know if this is
 16 okay and I will print ... and post it to you."
 17 Yes?

18 **A.** Yes.

19 **Q.** What was the purpose of Mr Dunks seeking
 20 approval from you on whether his witness
 21 statement from Fujitsu, relating to the Helpdesk
 22 calls in the *Misra* case, was okay?

23 **A.** I don't know.

24 **Q.** But what role were you performing here?

25 **A.** Well, my role should have been he'd send the

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1 "Jon,
 2 "Can you give Andy the green light and/or
 3 comment on my thoughts above."
 4 Then page 3, please, foot of the page:
 5 "Andy,
 6 "The statement is fine but the mention of
 7 107 calls will no doubt interest the defence
 8 barrister. If possible could you include in the
 9 statement a breakdown of the calls to cover
 10 time/date/nature of call. If we don't include
 11 it now the defence will only request this
 12 later."
 13 Reply:
 14 "107 calls may seem a lot but it only
 15 equates to approximately 3-4 calls a month over
 16 the time frame. To add the information you want
 17 is going to take 1 to 2 days of uninterrupted
 18 work to complete. So to get it completed by the
 19 26 June is not impossible it would be cutting it
 20 fine ...
 21 "If you need the extra detail I will enquire
 22 about when we can get this."
 23 Then scroll up:
 24 "Let's run with the statement as it is [says
 25 Mr Longman]. If the defence do want details of

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1 the 107 calls then a further statement will be
 2 needed at a later stage. Maybe you could add in
 3 your statement that the total calls only work
 4 out at 3-4 a month over the time period and that
 5 this is not a high amount for a post office."
 6 Then scroll up.
 7 "Okay ...
 8 "Will add this to the statement and get it
 9 posted to Dave ASAP."
 10 Was this usual for the prosecutor and the
 11 Investigator to influence the content of the
 12 Fujitsu statements?
 13 **A.** I don't recall but, in that string of emails
 14 you've just read out, can you -- is there
 15 an example specifically that you can cite?
 16 **Q.** Well, the suggestion, firstly, that to add in
 17 the detail of the 107 calls and then the
 18 suggestion "Well, if it's going to take too
 19 long, let's not".
 20 **A.** Okay, so the 107 calls that I think was
 21 mentioned by Andy Dunks, I think Mr Longman has
 22 asked him to include that in the witness
 23 statement.
 24 **Q.** Then he's come back and said, "That's going to
 25 take a while", and he's said, "Well, all right,

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1 I'm surprised I've been copied into all of these
 2 details between the Investigator and Andy Dunks.
 3 **Q.** Why are you surprised?
 4 **A.** Because I wasn't the Investigator, albeit
 5 I did --
 6 **Q.** Didn't you say earlier that it was necessary
 7 that you were the point of contact for things to
 8 be routed through you?
 9 **A.** Albeit I mentioned earlier exactly what you've
 10 just said. So I was the liaison point, but Jon
 11 was the officer in the case. I mean, from my
 12 perspective, he's saying it there "Let's run
 13 with it as it is but, if the defence do want
 14 details of the calls", so they would be
 15 informed, in one way, shape or form, that there
 16 are 107 calls, "then a further statement will be
 17 needed at a later stage". Yeah.
 18 **Q.** Would you expect this kind of material to go on
 19 a schedule of unused?
 20 **A.** Yes, if it hasn't been disclosed in another way.
 21 **Q.** What other way might it have been disclosed?
 22 **A.** Full details within the witness statement --
 23 **Q.** No, what I meant was correspondence with the
 24 witness.
 25 **A.** Well, personally, I would say yes.

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1 well, don't then"?
 2 **A.** Can we go to that paragraph?
 3 **Q.** Sure, if we scroll down, there:
 4 "Andy,
 5 "Let's run with the statement as it is. If
 6 the defence do want details of the 107 calls
 7 ..."
 8 **A.** Right. So --
 9 **Q.** So Mr Dunks has prepared a statement that
 10 mentions 107 calls, the emails have come through
 11 you and Mr Longman, and the suggestion has been
 12 "We need to set out what those 107 calls relate
 13 to, what they're about".
 14 **A.** Yeah.
 15 **Q.** Mr Dunks has come back and said, "Well, that's
 16 going to take a while".
 17 **A.** Yes.
 18 **Q.** Then Mr Longman has said, "Well, let's just go
 19 with the mention of them. If the defence want
 20 more, they can ask for it".
 21 **A.** Yes.
 22 **Q.** So my question is: was it usual to influence the
 23 content of prosecution witness statements like
 24 this?
 25 **A.** I don't think it was usual but I can't remember.

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1 **Q.** Thank you, that can come down.
 2 What were the processes within the Post
 3 Office to ensure that the fundamental disclosure
 4 principle of retain, record and reveal were
 5 applied to information held by the Post Office.
 6 **A.** Could you repeat the first part of that?
 7 **Q.** Yes. There's a principle in the law of
 8 disclosure called retain, record and reveal.
 9 **A.** Yes.
 10 **Q.** Were you aware of that?
 11 **A.** It rings a bell, yes.
 12 **Q.** What processes existed within the Post Office to
 13 ensure that that principle was carried into
 14 effect in Post Office prosecutions?
 15 **A.** I'm not aware of any process.
 16 **Q.** Was there any process that you were aware of
 17 that existed in the Security Team to ensure that
 18 there was correlation of information held by the
 19 Post Office that went to the operation of
 20 Horizon, that was relevant to the operation of
 21 Horizon --
 22 **A.** Not that I recall, no.
 23 **Q.** -- ie when a defendant challenged the figures
 24 produced by Horizon, rather than going to
 25 Fujitsu, the enquiry started at home and said,

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1 "What do we, the prosecutor, the organisation,
2 already hold about Horizon integrity issues?"
3 **A.** Not that I recall, no.
4 **Q.** Was there a central repository, that you are
5 aware of, of information from whatever source
6 concerning the integrity of Horizon or the lack
7 of it?
8 **A.** The only thing I can think of was in the last
9 year or two of when I was in the Security Team
10 there were Horizon integrity meetings with
11 various people around the business, sat around
12 the table every week.
13 **Q.** This is the weekly Wednesday hub meeting?
14 **A.** Yes.
15 **Q.** I'm talking about for the period between 2000
16 and, say, up to July 2013.
17 **A.** Right. I'm not aware of a central repository or
18 I don't recall a central repository.
19 **Q.** So, so far as you were aware, there wasn't
20 a data room or a file, or somewhere on a server,
21 or even in hard copy, a central repository in
22 which Post Office's knowledge of errors, bugs
23 and defects within Horizon could be stored --
24 **A.** Not that I recall, no.
25 **Q.** -- and that could be disclosed in any

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1 **Q.** On what basis do you make the assessment that
2 training was adequate?
3 **A.** At the time, the training, I believe
4 I understood it, which is a good start, and
5 I thought it covered what we needed to know at
6 the time.
7 **Q.** Did it include training on the importance or how
8 fundamental disclosure was to the fairness of
9 criminal investigations and criminal
10 prosecutions?
11 **A.** I've got a vague memory that the Criminal Law
12 Team did a training session on disclosure but
13 I can't remember the details of that training.
14 **Q.** Can you remember whether it included training on
15 the nature of the statutory and common law
16 duties owed by an Investigator and a prosecutor?
17 **A.** I don't recall.
18 **Q.** Can you remember whether it included any
19 training on the extent to which the duties could
20 not be delegated to a third party, that the
21 prosecutor owed the duties rather, than a third
22 party like Fujitsu?
23 **A.** I don't recollect that, but that would make
24 absolute sense to me. It's the prosecutor's
25 duty.

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1 prosecution?
2 **A.** Not that I recall.
3 **Q.** Was there any system for informing Investigators
4 about any problems with Horizon?
5 **A.** I don't think there was a system in place that
6 I can recall.
7 **Q.** Overall, would you agree that there was not
8 a formal coherent approach across prosecutions
9 as to the investigative approach that should be
10 taken where a subpostmaster sought to rely on
11 errors in Horizon as explaining the losses
12 alleged against them?
13 **A.** I would agree.
14 **Q.** Can we turn to your understanding of the Post
15 Office's disclosure obligations. You tell us in
16 paragraph 53 of your statement that the training
17 provided to Investigators on issues including
18 disclosure was adequate, yes?
19 **A.** Sorry, 53?
20 **Q.** Yes.
21 **A.** Yes.
22 **Q.** Yes?
23 **A.** Yes.
24 **Q.** Is that a fair summary of it?
25 **A.** Yes.

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1 **Q.** Was the training theoretical, in the sense of
2 telling you about the CPIA and the common law,
3 and things like that?
4 **A.** I think it was, yes.
5 **Q.** Was it ever translated into how the principles
6 of law and the legal obligations translated into
7 information held by the Post Office across its
8 own estate --
9 **A.** I don't recall that.
10 **Q.** -- ie how the obligation was to be discharged in
11 fact by the Post Office across all aspects of
12 its business?
13 **A.** I don't recall.
14 **Q.** Did the training include training on the
15 obligation placed upon an Investigator to pursue
16 all reasonable lines of inquiry, whether they
17 pointed towards or away from the suspect?
18 **A.** I believe that was part of the training, yes.
19 **Q.** Again, was that translated or applied to
20 prosecutions of subpostmasters for theft or
21 false accounting, ie how do we translate that
22 obligation on the ground in a shortfall case?
23 **A.** Yeah. I don't recollect the training. I mean,
24 for example, in the Seema Misra case, the only
25 thing I remember about that was doing Mr Longman

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1 a favour by knocking at addresses because there
2 was an allegation that staff members had stole.
3 So he was pursuing a line of inquiry that the
4 subpostmistress had raised. That sort of ties
5 in with what you were saying?

6 **Q.** Well, I was thinking more in a case where
7 a subpostmaster said "It's Horizon that's
8 causing the discrepancy", how the principle of
9 the pursuit of reasonable lines of inquiry was
10 going to be translated on the ground into some
11 action.

12 **A.** I don't remember that being part of the
13 training.

14 **Q.** What about outside of training, something more
15 general in a discussion amongst the team,
16 one-to-ones, group meetings, "Look we've got
17 some subpostmasters", as they did, "saying 'I'm
18 not to blame, I think it's the system'. What do
19 we do? Let's approach a standard approach
20 across the piece".

21 **A.** I don't recollect meetings of that nature.
22 I also think I was probably too low down the
23 pecking order to come up with those sort of
24 ideas.

25 **Q.** Did you see the fruits of any such ideas,

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1 we really allowed to use that as a limitation on
2 the disclosure that we seek from them?"

3 **A.** I would say no.

4 **Q.** I think if we turn to page 68 of your witness
5 statement, which is on page 20, that will just
6 come up on the screen for you, at the foot of
7 the page:

8 "The request [that's the Rule 9 Request we
9 sent you] also asked me about the role played by
10 Gareth Jenkins in criminal prosecutions.
11 I recall Gareth Jenkins provided witness
12 statements to Investigators, including exhibits
13 containing Horizon data that Fujitsu had
14 supplied in response to ARQs. My understanding
15 of the role of Gareth Jenkins was that he
16 provided his knowledge and experience concerning
17 Horizon. I recall I viewed him as an expert
18 witness, since he was known to have expertise
19 ..."

20 Then this:

21 "... but I did not know the rules governing
22 independent expert evidence."

23 Yes?

24 **A.** Yes.

25 **Q.** That can come down, thank you.

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1 something like a side of A4, or maybe even
2 stretching to two sides of A4, saying, "Look,
3 subpostmasters are starting to blame Horizon
4 here. This is what we need to do when they do
5 so"?

6 **A.** I mean, I can remember "Subpostmasters are
7 starting to raise Horizon", I don't remember
8 "This is what we should do".

9 **Q.** Can you remember whether the training in
10 included any guidance on what the law required
11 and whether the law's requirements could be
12 abrogated or watered down on cost grounds --

13 **A.** I don't recall, no.

14 **Q.** -- or the extent to which the contract that the
15 prosecutor had already made with a third party
16 could be used as a relevant consideration in
17 deciding whether to seek information or not?

18 **A.** I don't recall that either.

19 **Q.** Did you think that the contract could be used in
20 that way: "We've already made a contract with
21 this person, this organisation, which limits the
22 amount of material we can get from them a month
23 and a year", there was of course a facility to
24 get material outside of that, but "we want to
25 try to stay within the contractual limits, are

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1 Does it follow from what you said in that
2 last line there, in paragraph 68, that you had
3 not been trained and you had no knowledge or
4 understanding of the law on the responsibilities
5 of a prosecutor when they instructed an expert?

6 **A.** I had no training on that. That is correct.

7 **Q.** What about knowledge or understanding?

8 **A.** Well, my knowledge and understanding in that
9 scenario is that Gareth Jenkins was -- how can
10 I say this -- expert with a small "e" because he
11 knew about Horizon, he had the knowledge and
12 experience to do his witness statements. It was
13 pointed out to me that an "expert witness",
14 perhaps with a capital "E" is somebody who
15 should be independent in coming up with
16 a statement, whether it falls to the benefit of
17 the Post Office or the defence, or it does or it
18 doesn't.

19 **Q.** Who pointed that out to you?

20 **A.** My solicitor.

21 **Q.** You mean in the context of these proceedings?

22 **A.** No, as a general. But because I didn't know,
23 that's why I put that in my witness statement.

24 **Q.** I see. When you say your solicitor told you,
25 you mean your Inquiry solicitor?

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1 A. Yes.

2 Q. Right. I don't want to know anything more about
3 that.

4 A. That's fine.

5 Q. At the time, did you understand the distinction
6 that you just made?

7 A. At the time?

8 Q. Yes, back in 2009/10?

9 A. As I say, I thought Gareth Jenkins was an expert
10 because of his knowledge and experience of
11 Horizon.

12 Q. I think it follows from the answers that you
13 gave that you didn't know that instructing
14 an expert gave rise to some specific disclosure
15 obligations on an Investigator and a prosecutor;
16 is that right?

17 A. Sorry, engaging an expert?

18 Q. Yes, instructing an expert gave rise to some
19 quite specific disclosure obligations on
20 a prosecutor?

21 A. Yes, I guess.

22 Q. Did you know that?

23 A. Well, I didn't know that, no.

24 Q. Okay. So, for example, the prosecutor was
25 required to bring to the attention of the

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1 A. Well, I can only go back to when I was
2 an Investigator and I would disclose everything
3 I had --

4 Q. Okay.

5 A. -- which would have included something like
6 that, if that was the case for me.

7 Q. You told us in paragraph 53 of your witness
8 statement that you considered that training on
9 issues including taking witness statements and
10 evidence gathering was adequate and you told us
11 in paragraph 68 that you didn't know the rules
12 governing the obtaining of expert evidence?

13 A. Yes.

14 Q. Those two things don't seem to sit very well
15 with each other.

16 A. Well, I think my comment on adequacy was based
17 on the training at the time. Back then, yeah,
18 I thought it was adequate. Now, sitting here,
19 perhaps it wasn't so adequate.

20 Q. I see. Can I turn to the prosecution's approach
21 to disclosure in Mrs Misra's case and start by
22 looking at FUJ00122794. Start by looking at
23 page 2, please. Scroll down, please, thank you.

24 This is correspondence that you're not
25 copied into at this moment, between Jarnail

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1 defence and to the court any material which it
2 was in possession of that was reasonably capable
3 of undermining the expert's opinion?

4 A. Yes.

5 Q. You didn't know that at the time?

6 A. I can remember that phrase, anything that
7 undermines the prosecution or assists the
8 defence, yes.

9 Q. Specifically, that was a general understanding
10 you had --

11 A. Yes.

12 Q. -- for disclosure obligations --

13 A. Yes.

14 Q. -- rather than being in the context of the
15 instruction of an expert?

16 A. Yes, correct.

17 Q. What about the existence of a duty, did you know
18 this, that communications between the
19 investigator/prosecutor and the expert, for the
20 purposes of preparing the report of the expert,
21 fell to be considered for disclosure?

22 A. No, I don't recollect that.

23 Q. Did you understand that there would be a duty to
24 record the existence of such communications on
25 a Schedule of Unused Material?

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1 Singh, who you know, and David Jones, who was
2 Head of Legal in Fujitsu. Do you remember that
3 name, David Jones?

4 A. I don't but that -- David Jones has cropped up
5 on another document.

6 Q. Yes, it has. If we look, this is 5 February
7 2010 and the email from Mr Singh to Fujitsu --
8 Gareth Jenkins and Penny Thomas are also copied
9 in -- at paragraph 3, where it says in the
10 introduction:

11 "On first glance, points 2-4 have not been
12 answered which I reproduce below."

13 Then 3:

14 "When Gareth completes his statement could
15 he also mention whether there are any known
16 problems with the Horizon system that Fujitsu
17 are aware of. If none could this be clarified
18 in the statement."

19 So to put this in context what had been
20 requested was a witness statement from Gareth
21 Jenkins that included "mention of whether there
22 were any known problems with the Horizon system
23 that Fujitsu are aware of", and that that hadn't
24 been addressed --

25 A. Yes.

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1 Q. -- in the draft statement.
 2 Then if we scroll up, please, the reply from
 3 Mr Jenkins, in relation to 3 -- the introduction
 4 is "Brief response [is below] but not sure
 5 I should put them in a Witness Statement" -- to
 6 3, this is "Are there any known problems with
 7 Horizon" was:
 8 "This is where I'm reluctant to make a clear
 9 statement."
 10 Just stopping there, would you think that
 11 met the test for disclosure on an unused
 12 material schedule?
 13 A. What, this particular email?
 14 Q. Yes, this exchange.
 15 A. Yes.
 16 Q. Why would you think it would meet the test for
 17 disclosure?
 18 A. Well, again, if I was an Investigator, I would
 19 disclose everything and anything. I mean, if I
 20 look at the specifics, bearing in mind I don't
 21 think I've seen this string of emails, it's --
 22 Q. When you say that -- you've seen them now for
 23 these purposes -- you mean at the time?
 24 A. Yeah. To me, especially here and now, it's
 25 relevant to the case and many other cases.

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1 check for any such events. In the case of West
 2 Byfleet we have not provided any transaction
 3 logs and so have not made these checks."
 4 Again, would you say that that part of the
 5 exchange met the test of for disclosure that
 6 Fujitsu knew of a known problem of lost
 7 transactions?
 8 A. Yes.
 9 Q. Again, in other prosecutions too?
 10 A. Yes.
 11 Q. Can you recall ever being shown this exchange?
 12 A. I don't recall it, no.
 13 Q. If we scroll up, please, and again, we can see
 14 that the exchange went within the Post Office to
 15 Mr Singh alone; can you see that?
 16 A. Yes.
 17 Q. You don't recall Mr Singh passing this back on
 18 to you?
 19 A. I don't recall it, no.
 20 Q. Thank you. Can we move on to a similar topic in
 21 Mrs Misra's case. POL00055059.
 22 Can you see this is an exchange between Issy
 23 Hogg, who is Mrs Misra's defence solicitor, and
 24 Mr Singh in July 2010, and she says:
 25 "As a result of a meeting that took place

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1 Q. le that the distinguished engineer at Fujitsu,
 2 in some senses a person regarded as possessing
 3 the greatest expertise to speak to the operation
 4 of the Horizon system, was reluctant to make
 5 a clear statement that there are any known
 6 problems with the Horizon system.
 7 A. Yes, so --
 8 Q. That's pretty significant, isn't it?
 9 A. Yes, so -- well, keeping it simple, the lawyer
 10 has asked simple were there any issues, and
 11 Mr Jenkins has responded he's reluctant to get
 12 into that, by the sounds of it.
 13 Q. So I think, in the answer before last, you said
 14 that this ought to have been disclosed not only
 15 in this prosecution but all prosecutions,
 16 certainly after the exchange occurred?
 17 A. I would think so, yes.
 18 Q. Going back up to the reply, please. Mr Jenkins
 19 continues:
 20 "I am aware of one problem where
 21 transactions have been lost, in particular
 22 circumstances due to locking issues. When this
 23 happens, we have events in the eventing logs to
 24 indicate that there was an issue and whenever we
 25 provide transaction logs to the Post Office we

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1 between Charles McLachlan and Gareth Jenkins ...
 2 we need to have ..."
 3 Then it's the third bullet point:
 4 "... access to system change requests, Known
 5 Error Log and new release documentation ..."
 6 Would you have expected a defence request
 7 for such disclosure to have been routed through
 8 you, given that it relates to material held by
 9 Fujitsu?
 10 A. Not at this stage. Not only was I not the
 11 Casework Manager, I may well have moved on from
 12 being the Fraud Risk Manager into my next role,
 13 which was Accredited Financial Investigator,
 14 unless -- and this goes back to what I said
 15 earlier -- I seem to be involved in a lot of
 16 projects and tasks relating to all sorts of
 17 things.
 18 Q. In your time, and I'm talking about before 2013,
 19 had you ever heard of something called a "Known
 20 Error Log"?
 21 A. Not that I recall, no.
 22 Q. Did you know of the existence of a species of
 23 document created by Fujitsu that recorded known
 24 errors with Horizon?
 25 A. Not to my recollection, no.

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1 Q. If you had have known of a series of documents
 2 written by Fujitsu, which recorded known errors
 3 with Horizon, would that have been something
 4 which you had wished to consider for disclosure?
 5 A. Now, yes. Then, I don't know.
 6 Q. Why do you think you might not have wanted to
 7 look at the material if it was a series of
 8 documents concerned with known errors with
 9 Horizon?
 10 A. Because back then, I -- I don't know whether
 11 I would have understood the magnitude of
 12 something like that: is it relevant to cases,
 13 and so on and so forth. Yeah, I just don't
 14 know, back then.
 15 Q. Can we turn to POL00055113. If we scroll down,
 16 please, this is an email exchange between
 17 Mr Longman and Mr Singh:
 18 "This is the response I have [got back] from
 19 Penny following [the defence solicitor's] email.
 20 "I've had a discussion with Gareth.
 21 "It was agreed ... that Charles would
 22 provide notes reflecting the discussion ...
 23 "His [Gareth's] views on the email string
 24 are ..."
 25 Then if we look at 3:

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1 Can we turn to the topic of unfolding
 2 knowledge of bugs, errors and defects in
 3 Horizon. Can I start, please, by looking at
 4 POL00139733. This is a document which I think
 5 is written by you.
 6 A. Yes.
 7 Q. You say:
 8 "I conducted Torch visits to a number of
 9 branches on 11/04/13 ..."
 10 Can you tell us what a Torch visit was,
 11 please?
 12 A. Yes, so I think we discussed yesterday, the last
 13 job I had in Post Office Security was
 14 a combination of investigation and security.
 15 Torch visits were so named because we would
 16 visit branches to shine a light on their secure
 17 procedures, ie did they let us in without ID,
 18 was the safe door flapping in wind, and stuff
 19 like that.
 20 Q. So was it primarily aimed at physical security?
 21 A. Yes.
 22 Q. You say:
 23 "... Whilst at Westerham, the manager just
 24 happened to show me a real time anomaly. He had
 25 a customer in front of him who wanted to post

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1 "System Change Requests: Basically, he
 2 [Professor McLachlan] was asking to look at all
 3 the system faults. I suggested that as we kept
 4 all testing and live faults in the same system
 5 and that there were around 200,000 of them, then
 6 this wasn't going to get him far. He then
 7 suggested looking at the system changes and
 8 would like to know all changes that had happened
 9 to the system. I don't think this will help.
 10 I don't know how practical it is for Fujitsu's
 11 release management to provide that. I think all
 12 we can do is ask the question."
 13 You see the mention there of 200,000 or
 14 around 200,000 live faults in the system.
 15 A. Yes.
 16 Q. Was that a figure which was ever revealed to
 17 you?
 18 A. I don't recollect that at all. I mean, reading
 19 that, it sounds as though Mr Singh knows more
 20 about Horizon and the relationship with Fujitsu
 21 than I did.
 22 Q. Would you consider that this material might fall
 23 for disclosure?
 24 A. Yes.
 25 Q. Thank you. That can come down.

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1 a small standard letter by recorded delivery.
 2 [The manager] explained it should be £1.70 [you
 3 checked that was correct]. I associate 3 photos
 4 which show ..."
 5 Unfortunately on the copies we've got it
 6 doesn't actually show it, we can't see it, but:
 7 "1. The Horizon [system] -- 11 April --
 8 screen clearly shows the weight of 25 grams in
 9 the top right-hand corner. However, there are
 10 no options displayed concerning a first class
 11 signed for letter at £1.70. Instead, the signed
 12 for options start at £3.70 for a second class
 13 for a small parcel, to £6.75 for a first class
 14 signed for medium parcel. The manager said he
 15 has had problems in relation to this for the
 16 past few days and has to reboot the terminal to
 17 rectify, which takes a number of minutes to
 18 perform. He has retained letters and asked
 19 customers to pop back for their receipts",
 20 et cetera.
 21 Scroll down. Again, please:
 22 "[The manager] has written 'Horizon terminal
 23 shows a high value in Recorded Delivery.
 24 Rebooted'.
 25 Then scroll down:

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1 "... on 9 April, the manager has written
2 a similar entry ... 'called helpline', yes?
3 **A.** Yes.
4 **Q.** So this wasn't really about physical security
5 that you were writing the note?
6 **A.** No, physical security was the reason for the
7 visit.
8 **Q.** No, but whilst you were there you happened to
9 see a Horizon anomaly?
10 **A.** Yes, and around this time I attended the weekly
11 Horizon integrity meetings and, to put it
12 bluntly, if we came across anything Horizon
13 related that's a potential issue, we were to
14 bring it back to the table, which is why
15 I captured all these photographs.
16 **Q.** I see, you've anticipated my next question: why
17 was it that you were reporting back? It was
18 because you were attending the Wednesday hub
19 meetings at this time?
20 **A.** Yes, yes.
21 **Q.** So anything to do with Horizon problems, you
22 scooped up and reported back?
23 **A.** Yes.
24 **Q.** But this was something observed by you in front
25 of your very eyes?

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1 with ARQs, notify them of prosecutions, where
2 their data had been used.
3 **Q.** So it was specifically about the interface
4 between Post Office on the one hand, Fujitsu on
5 the other, in relation to investigations and
6 prosecutions?
7 **A.** Pretty much, yeah.
8 **Q.** Who led the meetings?
9 **A.** I don't think either of us led the meetings.
10 Normally, it was myself or my predecessor and
11 Penny and/or Pete Sewell. On this particular
12 occasion there are more attendees because,
13 thankfully, I'm handing over the responsibility
14 of the relationship to other people.
15 **Q.** Can we look at page 2, please. Can you see the
16 heading "Horizon integrity"?
17 **A.** Yes.
18 **Q.** "Dave [I think that's you in context] explained
19 that there had been recent press coverage which
20 questioned the integrity of Horizon data. This
21 had been founded by Lee Castleton and articles
22 had been seen in Computer Weekly and The Grocer
23 and had featured on the Welsh BBC News. A team
24 had been formed to review these accusations."
25 Yes?

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1 **A.** Indeed, yes.
2 **Q.** What impact, if any, did this have on your
3 impression of the reliability or integrity of
4 Horizon?
5 **A.** I thought it was another glitch, which, as
6 I mentioned yesterday, I think all computer
7 systems have from time to time. In terms of
8 financials, I think put on here somewhere that,
9 if the icon is not there, you can't -- it won't
10 affect the balance because you just can't choose
11 the option because there's no icon. But it is
12 a glitch and that's why I captured it.
13 **Q.** Can we go back in time, then. FUJ00154859.
14 Thank you. This is one of a series of notes of
15 bimonthly meetings with Fujitsu. This one
16 you'll see that the date is 3 November 2009,
17 covering the period of September and October
18 2009, yes?
19 **A.** Yes.
20 **Q.** Can you remember what the purpose of these
21 bimonthly reviews was?
22 **A.** Yeah, they weren't always bimonthly. There
23 could be a few months but it was basically
24 a catch-up meeting between Post Office casework
25 and Fujitsu, just to sense check where we were

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1 **A.** Yes.
2 **Q.** So this is at the time when Computer Weekly was
3 generating, would this be right, significant
4 publicity for the claims that Horizon lacked
5 integrity?
6 **A.** I believe so, yes.
7 **Q.** That had been repeated, as you say here, on BBC
8 Wales --
9 **A.** Yes.
10 **Q.** -- and in The Grocer magazine?
11 **A.** Yes.
12 **Q.** So would this be right: by this time, in the
13 autumn of 2009, both sides of the house, both
14 the Post Office and Fujitsu, insofar as they
15 were engaged in the prosecution process, would
16 have been aware of the publicity about Horizon
17 integrity coming from these three sources?
18 **A.** I would say so, yes.
19 **Q.** You say that there was a team formed to deal
20 with the allegations or accusations?
21 **A.** Yes.
22 **Q.** Was that a team at the Post Office, at Fujitsu
23 or did it involve both organisations?
24 **A.** I don't remember it but I would imagine it was
25 a team from the Post Office.

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1 Q. Can you help identify the members of the Post
 2 Office team that had been formed by autumn 2009
 3 to deal with or review the accusations?
 4 A. I can't recall the team in 2009.
 5 Q. Can you assist whether Mr Scott was involved in
 6 it?
 7 A. I don't know.
 8 Q. Mandy Talbot?
 9 A. I don't know.
 10 Q. Rob Wilson?
 11 A. Yeah, I don't know.
 12 Q. Jarnail Singh?
 13 A. I don't remember this, so I can't say who was in
 14 this particular team.
 15 Q. Okay. This records you as saying that the team
 16 had been formed to review allegations. Can you
 17 recall what the review was to look like, what it
 18 was to consist of?
 19 A. No, unless it concerns, I think, what we
 20 discussed earlier, where -- or yesterday rather,
 21 where I made sure that Rob Wilson was kept in
 22 the loop on those particular meetings. I don't
 23 know whether this team is that sort of team or
 24 the same team.
 25 Q. Was there any discussion, to your knowledge, of

1 A. Not that I recall, no.
 2 Q. Did it at least cause anyone, to your knowledge,
 3 to pause and think "To what extent can we
 4 continue to rely on assurances from Fujitsu of
 5 the type we got in relation to the security
 6 incident"?
 7 A. Not to my knowledge, no.
 8 Q. To your knowledge, did anyone think "We should
 9 reflect and pause, potentially pause,
 10 prosecutions"?
 11 A. I don't believe that was ever communicated to
 12 me, no.
 13 Q. Do you think it was ever considered, to your
 14 knowledge, by anyone?
 15 A. To my knowledge, I don't know, whether it was
 16 considered by anyone.
 17 Q. Did you, for your part, consult with anyone else
 18 about these accusations that were being made?
 19 A. Not that I recall.
 20 Q. I mean, if we look at the cast list at the top
 21 on page 1, who's the senior Post Office
 22 individual there?
 23 A. Mark Dinsdale.
 24 Q. There's a lot of managers there, why is he the
 25 most senior?

1 whether an independent review was necessary and
 2 should take place in the light of the
 3 allegations or accusations?
 4 A. Not to my knowledge then.
 5 Q. Now, at this time, out of the people concerned,
 6 at least you and Mr Wilson would have been aware
 7 of the correspondence earlier in 2009 which
 8 referred to errors impacting the ARQ data --
 9 A. Yes.
 10 Q. -- and that that had involved what was described
 11 as an unseen error by Fujitsu?
 12 A. Yes.
 13 Q. How did that knowledge inform your reaction to
 14 these accusations that were being made in these
 15 three sources?
 16 A. I don't know whether that security incident
 17 would have been factored into my thinking in
 18 relation to these articles.
 19 Q. You had essentially been assured by Fujitsu at
 20 that time?
 21 A. Yes.
 22 Q. Did anyone at this time, later in the year,
 23 query whether the Post Office should continue to
 24 have confidence in assurances that Fujitsu gave
 25 as to the integrity of Horizon data?

1 A. So I'm relinquishing the role of the Casework
 2 Manager or, more specifically, the Fujitsu
 3 relationship element of the Casework Manager.
 4 Mark Dinsdale was, in effect, I believe, going
 5 to be the new Casework Manager and Jane Owen
 6 reported to him, so I think the pair of them
 7 were going to take over the relationship.
 8 Q. This discussion was occurring right at the same
 9 time as the development of Horizon Online was
 10 working at pace, wasn't it?
 11 A. I don't know.
 12 Q. Were you aware of the development of Horizon
 13 Online in autumn 2009?
 14 A. I can remember Horizon, I can remember Horizon
 15 Online and I can remember Horizon Next
 16 Generation. I don't know what the differences
 17 are between them, other than that they were
 18 updated versions of Horizon. I don't know the
 19 dates or the specifics of them.
 20 Q. Was there ever any discussion that you were
 21 a party to or that you heard about concerning
 22 whether revelation of bugs, errors and defects
 23 in the existing Horizon, Legacy Horizon, would
 24 have or might have implications for the
 25 development of Horizon Online?

1 A. I don't recall and that's something I think
 2 I would have remembered.
 3 Q. Where you later aware of something called the
 4 Ismay report?
 5 A. Only through watching these proceedings, yes.
 6 Q. Going back to page 2, please, and looking at the
 7 Horizon integrity section, a team had been
 8 formed to review these accusations. What did
 9 you later learn about what that team did, if
 10 anything?
 11 A. I don't recall.
 12 Q. Were you told about the Ismay report at the
 13 time, that it reports in August 2010?
 14 A. I don't believe I was, because when I saw
 15 Mr Ismay giving his evidence, I think that was
 16 the first I knew about -- and from what I can
 17 gather, it was the Chief Executive who asked
 18 him, who was a Senior Manager, to do the report
 19 and, again, I'm probably a bit too far down the
 20 pecking order to have had sight of it.
 21 Q. Is what you are referring to here -- a team
 22 being formed to review the accusations -- in
 23 your view, what ended up being the Ismay report?
 24 A. I don't know.
 25 Q. What happened to that team that you're referring

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1 this case.
 2 "I have been assured previously
 3 (Dave Smith), that our Criminal Law Team are
 4 being kept updated regarding questions
 5 surrounding Horizon integrity.
 6 "They are obviously aware of this case, but
 7 can you confirm that they continue to be updated
 8 on the wider issues."
 9 If we can look at The Grocer article,
 10 POL00053935. I think it's right-hand side,
 11 halfway down, "A question mark". Yes,
 12 "A question mark over Horizon's IT":
 13 "There is just room here to report that
 14 Computer Weekly, which has been closely
 15 following the problems subpostmasters claim to
 16 be suffering over their Horizon accounting
 17 system, says that 'a subpostmistress accused of
 18 theft from the Post Office has had her case
 19 postponed to allow experts time to investigate
 20 the accounting IT system at her branch'.
 21 "The report adds: 'Seema Misra,
 22 subpostmistress at the West Byfleet Post Office
 23 in Surrey, is accused of one count of £74,000.
 24 She claims the IT system may have caused the
 25 account deficit'."

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1 to here?
 2 A. I don't know. I don't know what the team is.
 3 Q. Were you interested in the work of the team and
 4 what it made of the accusations?
 5 A. Interested? Um, I'll be brutally honest with
 6 you, I probably wasn't interested because
 7 I couldn't wait to get out of that job.
 8 Q. Why couldn't you wait to get out?
 9 A. Because it's a job I didn't want to go into,
 10 didn't like it from day one and was pleased when
 11 I did get out.
 12 Q. There's a reference to an article in The Grocer
 13 here. Can we look please at POL00167138. If we
 14 just scroll down, please, can you see an email
 15 here from you on 1 February 2010 to Michele
 16 Graves, Mandy Talbot, Jon Longman, Jane Owen,
 17 Andy Haywood, "re another article from The
 18 Grocer re Horizon".
 19 A. Yes.
 20 Q. You say:
 21 "Michele/Mandy,
 22 "This ties in with previous correspondence
 23 I've submitted -- in that Defence teams can and
 24 do challenge Horizon in prosecution cases.
 25 "Jon Longman is the Investigation Manager in

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1 If we go back to the email, please,
 2 POL00167138, and scroll down, please. You say:
 3 "This ties in with previous correspondence
 4 ...
 5 "Jon Longman is the Investigation Manager
 6 ...
 7 "I have been assured previously [by
 8 Dave Smith] that our Criminal Law Team is being
 9 kept updated."
 10 Why, in February 2010, were you involving
 11 yourself in this?
 12 A. Is mine the first email in that chain?
 13 Q. If we scroll down, keep going. There's an email
 14 from Michele, who is from the Executive Team
 15 correspondence team, to Mandy Talbot and Martin
 16 Humphreys.
 17 Then if we scroll up, it's not completely
 18 clear -- if we just scroll down in between --
 19 how you got that. Can you see? There's no
 20 forwarding or reply to you.
 21 A. No. I don't know.
 22 Q. Anyway, looking at the substance, if we scroll,
 23 please. You say:
 24 "I've been assured previously ... that our
 25 Criminal Law Team are being kept updated ..."

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1 That assurance had been given by Dave Smith.
 2 **A.** Yes.
 3 **Q.** In what circumstances had Dave Smith given you
 4 that assurance?
 5 **A.** I don't know what circumstances.
 6 **Q.** Was Mr Smith, that you're referring to there,
 7 the Head of IT?
 8 **A.** I think he was -- yes, the Head of IT and
 9 Change, maybe.
 10 **Q.** How frequently did you discuss allegations
 11 concerning Horizon integrity with the Head of IT
 12 and Change?
 13 **A.** I don't recall discussing with him at all but,
 14 clearly, if I've been assured by him previously,
 15 there must have been some engagement. And
 16 I think the thrust of this goes back similar to
 17 what I said yesterday, that "Please keep Rob
 18 Wilson in the loop", and on this particular
 19 occasion I've been assured by Dave Smith that
 20 our Criminal Law Team are being kept updated or
 21 in the loop.
 22 **Q.** Can we scroll up, please. It's forwarded on to
 23 counsel in the case, Mr Tatford, and the
 24 solicitor, Mr Singh.
 25 **A.** Yes.

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1 **Q.** No. Can we turn, please, to POL00141142. If we
 2 just scroll down, please, and again. Can we see
 3 the email that we looked at earlier from --
 4 sorry, if we keep scrolling, and again. Can we
 5 see the email that you sent to Mr Smith --
 6 **A.** Yes.
 7 **Q.** -- on the two case studies, yes? I'm just going
 8 to pick that back up. If we go back to the top,
 9 please, to page 1, at the top of page 1. Can we
 10 see an email there from you to Sue Lowther and
 11 Dave King concerning Horizon integrity?
 12 **A.** Yes.
 13 **Q.** You say:
 14 "Sue/Dave,
 15 "Below details individuals that were invited
 16 to the conference calls -- not all participated.
 17 There have been 2 conference calls ... it was
 18 envisaged that another would occur 16 October
 19 [2009], but that didn't materialise. Dave Smith
 20 phoned me last week -- asked me a few questions
 21 and indicated that Alan Cook is asking for more
 22 robust defence of Horizon. I believe the Press
 23 Office are drafting a response to the challenges
 24 we have had, based on the responses by
 25 conference call participants.

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1 **Q.** Again, can you just help us why you were
 2 involved in this, if you had moved on and, in
 3 fact, were anxious to move on?
 4 **A.** Can we just scroll down one?
 5 **Q.** Yeah, and again, and again.
 6 **A.** No, so my first email, it says, "Re another
 7 article" -- I don't know, because I don't seem
 8 to have been copied in on Michele Graves's
 9 email.
 10 **Q.** She sent it to two people?
 11 **A.** Yes, Mandy Talbot and Martin Humphreys.
 12 **Q.** Then if we go back up --
 13 **A.** If we go back up --
 14 **Q.** -- suddenly you're replying to her and lots of
 15 other people too.
 16 **A.** Yes, I mean -- but I didn't get the email or
 17 I wasn't copied in on the email. I mean, I've
 18 sent it to Michele Graves and Mandy Talbot;
 19 Jon Longman who is the officer in case, which
 20 seems logical; Jane Owen because she was the new
 21 Casework Manager; Andy Haywood was my senior
 22 manager. So I think I've copied in the relevant
 23 people but I don't understand that because
 24 I wasn't on the circulation in the previous
 25 email.

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1 "I also associate two emails that were sent
 2 by [some other people].
 3 "[and] I associate the case studies
 4 requested by Dave Smith which concern 2
 5 prosecution cases."
 6 Yes?
 7 **A.** Yes.
 8 **Q.** This records you having a conversation with Dave
 9 Smith, yes?
 10 **A.** Yes.
 11 **Q.** "Dave Smith phoned me last week"?
 12 **A.** Yes.
 13 **Q.** Again, is that David X Smith, the Head of IT --
 14 **A.** I think so.
 15 **Q.** -- rather than the Managing Director of the
 16 company?
 17 **A.** I don't recall a managing director of the
 18 company Dave Smith.
 19 **Q.** No. You, in this email, say that:
 20 "[Dave Smith] asked me a few questions and
 21 indicated that Alan Cook is asking for a more
 22 robust defence of Horizon."
 23 Can you remember who Alan Cook was at this
 24 time?
 25 **A.** I think he was the Managing Director of the Post

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1 Office.

2 **Q.** Correct. So you were being told by the Head of
3 IT that the Managing Director of the company
4 wanted a more robust defence of Horizon?

5 **A.** It looks like it, yes.

6 **Q.** Why was Dave Smith telling you about it?

7 **A.** I've got no idea.

8 **Q.** Was it because you were a person who was going
9 to be carrying that request into effect?

10 **A.** What, a robust defence of Horizon?

11 **Q.** Yes.

12 **A.** I don't think so but I don't remember this.

13 **Q.** Can you help us here? I mean, presumably it's
14 not every day of the week that you get a very
15 senior member of the organisation, the Head of
16 IT, a member of the Executive Team, telling you
17 the Managing Director's views?

18 **A.** No, it's not a -- it's a rare occurrence but --

19 **Q.** Yes, you don't hear every day or very often --

20 **A.** No.

21 **Q.** -- from the MD of the whole of the Post Office?

22 **A.** Correct, but I can't remember it.

23 **Q.** What was going to be done more robustly to
24 defend Horizon?

25 **A.** "[Dave Smith] asked me a few questions and
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1 people.

2 **Q.** The long email that we read, that's on pages 2
3 and 3 of this chain, the "muddying the waters"
4 email, I am going to call it. Was the provision
5 of that kind of information by you to more
6 senior members of the Post Office part of
7 an exercise in being more robust about the
8 Horizon?

9 **A.** I don't know and I don't think so.

10 **Q.** Why were you providing information that
11 subpostmasters who seek to blame Horizon for
12 their losses were just "muddying the waters"?

13 **A.** I think that was my honestly held view at the
14 time.

15 **Q.** Yes, but why were you being asked to regurgitate
16 it?

17 **A.** I don't know.

18 **Q.** Well, isn't it so that it could be deployed as
19 part of a more robust defence of Horizon?

20 **A.** That could be an element of it but it -- yeah,
21 I don't know.

22 **Q.** Was, essentially, what was happening here you
23 being tasked to produce essentially rebuttal
24 evidence, by way of these case studies, in
25 response to the adverse publicity in Computer
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1 indicated that Alan Cook is asking for more
2 robust defence of Horizon. I believe the Press
3 Office are drafting a response to the challenges
4 we have had, based on responses by conference
5 call participants."

6 I don't know what he was going to do or how
7 he was going to go about it.

8 **Q.** Do you know why the Managing Director of the
9 Post Office was asking for a more robust defence
10 of Horizon, as opposed for seeking neutrally
11 an explanation of the issues and their impact
12 on, amongst other things, prosecution cases?

13 **A.** I don't know but that sounds similar, from my
14 perspective, to the Rod Ismay report and the
15 circumstances about him drafting that report.

16 **Q.** But, again, why were you being told this? Were
17 you one of the lieutenants that were being asked
18 to be called into action to make that more
19 robust defence?

20 **A.** I don't know, all I can do is repeat what I said
21 earlier, is that I seem to be a go-to person to
22 assist with this or help out with that or point
23 people out in the right direction here and do
24 many, many other tasks. But, I mean, I was
25 nowhere near the pay level of these sort of
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1 Weekly, BBC Wales and The Grocer in autumn 2009?

2 **A.** The case studies could be relevant to that but
3 I don't recall them.

4 **Q.** Were you asked ever to conduct a substantive
5 investigation or review of the integrity of
6 Horizon?

7 **A.** I don't believe so. I don't think I'd know
8 where to start.

9 **Q.** You produced some material saying that, in some
10 prosecution cases, the raising of Horizon was
11 done to muddy the waters or in the hope that the
12 case is dropped. What evidence did you examine
13 to satisfy yourself that that was, in fact, the
14 case?

15 **A.** I don't recall. I think it was a general view
16 that a number of branches requested Horizon
17 data, nothing was found to be wrong with that
18 data and guilty pleas were entered.

19 **Q.** Can we look at page 2 of the email, please --
20 sorry, just look at the top of page 1 so we can
21 see Michele Graves to David X Smith and a group
22 of other people -- yes --

23 **A.** Yes.

24 **Q.** -- and including Rod Ismay. It says:
25 "Following on from Friday's conference call,
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1 I was asked to look into who the subpostmaster
2 was behind the postofficevictims website.
3 "I understand this to be Alan Bates whose
4 contract was terminated in 2003.

5 "Mr Bates also features in Rebecca Thomson's
6 article from Computer Weekly (you may recall
7 from our past communications she raised
8 a challenge to the system earlier this year via
9 Brian Binley).

10 "If you've not already done so, I would draw
11 your attention to www.computerweekly.com and
12 enter 'Post Office Horizon' into the search
13 facility, this will take you through to articles
14 on the Horizon and most notably the two latest
15 of 10 and 28 September. The former is from
16 David Jones MP saying he is considering
17 a commons debate and the latter around the
18 potential setting up of a subpostmaster action
19 group. Subpostmasters are invited to email
20 Rebecca or Mr Bates.

21 "Potential interest from BBC Watchdog is
22 also mentioned."

23 So this was Ms Graves, for the Executive
24 Team -- she is the Executive Team's
25 Correspondence Manager -- circulating

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1 A. No.
2 Q. And Philippa Wright?
3 A. No.
4 Q. You're included in this distribution list here,
5 yes?
6 A. Yes.
7 Q. Why were you included amongst this company here?
8 A. I don't know because I don't recall it.
9 Q. Did you participate in Friday's conference call
10 that's referred to?
11 A. I don't know.
12 Q. If we scroll up, please. A further email:
13 "Here is the website URL ... I have a hard
14 copy of articles ..."
15 Then up again, please.
16 A. Sorry, was I included on that one?
17 Q. If we scroll down. I don't think you were but
18 you seem to have got it because, if we scroll
19 up, you forwarded it.
20 A. Yes.
21 Q. So, presumably, there is some separate email
22 somewhere of this being sent to you and you've
23 cut it into this email chain. You say in the
24 body of the email "I associate" it.
25 A. Yeah.

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1 information about Mr Bates and his website, by
2 the reporting by Computer Weekly and by
3 potential interest from the BBC, yes?

4 A. Yes.
5 Q. Some investigation, it seems, had gone on into
6 identifying Mr Bates as being behind the Post
7 Office Victims website, yes?

8 A. Yes.
9 Q. This was circulated to a number of people and,
10 if we scroll up, some of whom are familiar to
11 us. Can you help us with those that aren't:
12 Alana Renner?

13 A. No idea.
14 Q. Bob Booth?
15 A. No.
16 Q. Hayley Fowell?
17 A. No.
18 Q. Jeremy Worrell?

19 A. No.
20 Q. Peter Johnson?
21 A. The name rings a bell but I can't say what it
22 was.
23 Q. Richard Stephenson?

24 A. No.
25 Q. Adam Martin?

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1 Q. You say that there had been two conference
2 calls. Can you recall whether Fujitsu were ever
3 invited into those conference calls?
4 A. I can't remember this incident so I certainly
5 couldn't say whether Fujitsu were part of the
6 calls.
7 Q. Can you recall whether there was any discussion
8 of the need for an independent investigation in
9 the light of this publicity involving Computer
10 Weekly, BBC Wales, potentially BBC Watchdog, The
11 Grocer magazine and an MP?
12 A. Not that I recall, no.
13 Q. Can you recall what was done to satisfy the
14 Managing Director's request that there should be
15 a more robust defence of Horizon?
16 A. I don't recall, no.
17 **SIR WYN WILLIAMS:** Sorry Mr Beer, it's a very minor
18 point but, just so I'm not missing what's
19 happening here, the email that Mr Posnett
20 forwarded, he does appear, does he not, next to
21 Mr Hulbert as a recipient?
22 **MR BEER:** Oh, quite right. I'd completely missed
23 that. We had both missed it. Thank you, sir.
24 Yes, so mystery solved. You forwarded it
25 because you received it.

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1 A. Yes.
 2 **MR BEER:** Sir, that is an appropriate moment because
 3 I was moving on from this correspondence to
 4 a new topic. I wonder whether if we might break
 5 until 1.55.

6 **SIR WYN WILLIAMS:** Yes.

7 **MR BEER:** Thank you very much, sir. 1.55.

8 (12.57 pm)

9 (The Short Adjournment)

10 (1.55 pm)

11 **MR BEER:** Good afternoon, sir, can you see and hear
 12 us?

13 **SIR WYN WILLIAMS:** Yes, thank you.

14 **MR BEER:** Mr Posnett, good afternoon. Can we look,
 15 please at a document we looked at this morning,
 16 just for one additional point. POL00167138,
 17 please. If we can look at the bottom of page 1
 18 and the top of page 2, please. You remember
 19 this email from you to that collection of people
 20 we see on the right --

21 A. Yes.

22 Q. -- and we were asking how it was that you got
 23 the article from The Grocer in Michele Graves'
 24 email below?

25 A. Yes.

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1 that email address and all five people get it?

2 A. Right.

3 Q. You can click on it, it will expand the group,
 4 there will be five emails from that group?

5 A. Right. Yes.

6 Q. You could either add to it, you could
 7 subcontract from it or just reply to all five of
 8 them?

9 A. Okay.

10 Q. Does it look like you've replied to the people
 11 in the POL Horizon Integrity Group?

12 A. I -- if this was a general Horizon group
 13 I wouldn't have thought Jon Longman was part of
 14 that. He was more case related -- specific case
 15 related, and Jane Owen I wouldn't imagine was
 16 part of that group.

17 Q. Jon Longman gets the email twice, doesn't he?

18 A. He does, yes.

19 Q. Going back down, then, to this POL Horizon
 20 Integrity Group, does it follow that by at least
 21 February 2010, the Post Office had set up
 22 an email group or a group of email addressees
 23 with the collective name POL Horizon Integrity
 24 Group?

25 A. It looks like that, yes.

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1 Q. Do you remember?

2 A. Yes.

3 Q. If we scroll down, please, and again, please, we
 4 can see that, on the face of it, she's not
 5 sending you the article from The Grocer. Your
 6 email address isn't one of the three listed
 7 there, is it?

8 A. Oh, yes. Correct, yes.

9 Q. But can you see the first of the three email
 10 addresses is the POL Horizon Integrity Group?

11 A. Yes.

12 Q. The second one is Mandy Talbot and the third is
 13 Martin Humphreys.

14 A. Yes.

15 Q. What was the POL Horizon Integrity Group?

16 A. I don't know, perhaps other than a team that was
 17 gathered to look at Horizon issues.

18 Q. If we scroll up, please, and again, it looks
 19 like you reply to Michele Graves and then expand
 20 what was the POL Horizon Integrity Group group
 21 email address by responding to individuals.
 22 You're aware you can do that?

23 A. Am I aware I can do that?

24 Q. Yes. If you have group email address, which has
 25 got five people in it, you can simply reply to

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1 Q. Do you remember being a part of the POL Horizon
 2 Integrity Group?

3 A. I don't remember that. The only one I do
 4 remember is the weekly Horizon integrity
 5 meetings.

6 Q. Which is much later?

7 A. I believe so, yes.

8 Q. Can you help us as to why you may have been
 9 a member of the POL Horizon Integrity Group?

10 A. As previously mentioned, I was utilised quite
 11 often to get involved in this or that or help
 12 people with this or that, because of my
 13 longevity in the Security Team and also possibly
 14 because of my role as Casework Manager.

15 Q. Can you recall what work the POL Horizon
 16 Integrity Group did?

17 A. Other than what these documents show, for
 18 example I was asked to do two case studies,
 19 I don't remember.

20 Q. Do you know how long it lasted for?

21 A. I don't know.

22 Q. Do you know whether there were any terms of
 23 reference for it?

24 A. Not that I recall.

25 Q. Is that noise putting you off?

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1 A. It's fine.
 2 **SIR WYN WILLIAMS:** It's putting me off!
 3 Sir, I don't know whether you can hear it
 4 sounds like the noise of a leaf blower or
 5 a chain.
 6 **SIR WYN WILLIAMS:** No, I'm immune from that, I'm
 7 pleased to say.
 8 **MR BEER:** I wonder if we could just take a pause
 9 whilst that's investigated.
 10 **SIR WYN WILLIAMS:** Yes. I'll stay in my position.
 11 I won't go anywhere, okay, Mr Beer.
 12 **MR BEER:** If we turn your camera off, sir, and all
 13 stay in our own positions and sit down.
 14 **SIR WYN WILLIAMS:** Yeah, fine.
 15 *(Pause)*
 16 **MR BEER:** Sir, can you see and hear us?
 17 **SIR WYN WILLIAMS:** Yes, thank you.
 18 **MR BEER:** We haven't found out what the noise was
 19 but it's stopped, so I'm going to take a punt
 20 and carry on.
 21 **SIR WYN WILLIAMS:** Fine.
 22 **MR BEER:** Is the short point then, Mr Posnett, that
 23 you can't remember being a part of the Post
 24 Office Limited Horizon Integrity Group of in
 25 February 2010?

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1 representing different teams within the Post
 2 Office. Any issues or claims or information
 3 which had come to the attention of teams across
 4 the business, relating primarily to Horizon,
 5 were raised at these meetings. These issues
 6 were collated and any actions identified.
 7 I recall notifying Security Managers that if
 8 Horizon was mentioned during the course of the
 9 investigation, then details should be flagged to
 10 me to be raised at these Horizon integrity
 11 meetings."
 12 **A.** Yes.
 13 **Q.** Can we look, please, at POL00126735. I think
 14 this is part of your appraisal; is that right?
 15 **A.** I believe so, yes.
 16 **Q.** You say:
 17 "I instigated a meeting with Cartwright King
 18 Solicitors as they had been contracted to deal
 19 with prosecutions concerning Post Office Limited
 20 cases."
 21 Yes?
 22 **A.** Yes.
 23 **Q.** "I also invited the Head of Criminal Law as he
 24 had been appointed following the split from
 25 Royal Mail Group."

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1 **A.** Correct, not in this context.
 2 **Q.** When years later, from 2013 onwards, you became
 3 a member of the Horizon integrity weekly group
 4 meetings, did you think to yourself "Hold on,
 5 I've done this before"?
 6 **A.** I don't remember --
 7 **Q.** "I've been part of an integrity group three
 8 years previously"?
 9 **A.** I don't remember thinking that. I do remember
 10 thinking "Here we go again, another thing I've
 11 been roped into", and it seemed to be me, from
 12 Security, and pretty much Senior Managers or
 13 heads of from other departments.
 14 **Q.** Let's look at that, then, the integrity meetings
 15 that you do remember. You address this in
 16 paragraph 147 of your statement, and it's
 17 page 43, please. Page 43 at the bottom,
 18 paragraph 147. You say, third line:
 19 "In my last couple of years working within
 20 the Security Team, I participated in these
 21 meetings ..."
 22 **A.** Yes.
 23 **Q.** "... (I refer to them as 'Horizon integrity
 24 meetings'). These were weekly conference calls
 25 meetings attended by different people

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1 Who are you referring to there?
 2 **A.** That would be Jarnail Singh.
 3 **Q.** "However, on discussing the proposed content of
 4 the meeting, he did not think that most of it
 5 was relevant."
 6 Just help us there. Why did Jarnail Singh
 7 think that meetings about Horizon integrity were
 8 not relevant?
 9 **A.** I don't think this was about Horizon integrity.
 10 This was Cartwright King were appointed the
 11 solicitors for the Post Office following the
 12 split from Royal Mail Group. I was asked to
 13 instigate a meeting with Cartwright King and it
 14 was purely an introductory meeting, meet and
 15 greet, and we did a presentation to them, and
 16 I can remember ...
 17 Would you like me to continue?
 18 **MR BEER:** Sir, I'm afraid noise has started once
 19 again. I think we'll have to have a break in
 20 the Inquiry until it goes away permanently. I'd
 21 probably ask you to turn off and occupy yourself
 22 otherwise and we will contact you by email when
 23 the Inquiry room is in a fit state to hear
 24 evidence.
 25 **SIR WYN WILLIAMS:** All right, that's fine.

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1 **MR BEER:** Thank you, sir.
 2 Sorry, Mr Posnett.
 3 **(2.10 pm)**
 4 **(A short break)**
 5 **(2.17 pm)**
 6 **MR BEER:** Sir, can you see and hear us?
 7 **SIR WYN WILLIAMS:** Yes, thank you.
 8 **MR BEER:** We've been told that it's some gardening
 9 work being carried out on the third floor of the
 10 London School of Economics, an outdoor garden.
 11 It involves some cutting and trimming, they need
 12 to do it whilst it's still daylight, they're
 13 going to return and do it in about 15 minutes
 14 from now and that will last two or three
 15 minutes. So in about 15 minutes' time it's
 16 going to start up again for two to three
 17 minutes.
 18 I'd suggest we all just sit tight, see that
 19 through, and then carry on.
 20 **SIR WYN WILLIAMS:** All the years that I've visited
 21 London and, in particular, this part of London,
 22 I had no idea that such a garden existed,
 23 Mr Beer.
 24 **MR BEER:** No.
 25 Can we look, please, at POL00126735. You
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1 forth.
 2 Mr Singh was invited because he was the Head
 3 of Criminal Law but I recall that his stance was
 4 "We need to tell them that we want this, that
 5 and the other, we want it quickly because it
 6 costs money", et cetera, et cetera. He had
 7 a point to some of what he said but my view was
 8 that this wasn't the purpose for this meeting,
 9 it was a meet and greet meeting.
 10 **Q.** I think you said you transferred your challenge
 11 to a Senior Security Manager and he ensured that
 12 the Head of Criminal Law didn't attend the
 13 meeting?
 14 **A.** That's correct. I spoke to Dave Pardoe, who was
 15 the strand leader and I think he arranged it
 16 that Mr Singh wasn't going to attend.
 17 **Q.** That was what Mr Singh wanted, he didn't want to
 18 attend?
 19 **A.** No, I think Mr Pardoe informed Mr Singh that he
 20 wasn't going to attend but I wasn't privy to
 21 that conversation so I'm not quite sure.
 22 **Q.** What was the difficulty here, then? Mr Singh
 23 didn't want to attend and Mr Pardoe said, "I'm
 24 going to ensure that he doesn't".
 25 **A.** I don't think he worded it like that but
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1 were telling us, I think, that this first box is
 2 not referring related to the Horizon integrity
 3 meetings; it's about something else?
 4 **A.** Yes.
 5 **Q.** Nonetheless, however, you were proposing to
 6 Jarnail Singh that he attended and he said he
 7 didn't think that most of the content of the
 8 meeting was relevant?
 9 **A.** Yes.
 10 **Q.** Cartwright King was the Post Office's customer,
 11 we simply had to tell them what the Post Office
 12 wanted and how it should be delivered?
 13 **A.** Yes.
 14 **Q.** You challenged that view because it involved
 15 relationship building with a new service
 16 provider.
 17 **A.** Yes.
 18 **Q.** What was the meeting between Cartwright King and
 19 the Head of Criminal Law to be about?
 20 **A.** It was a meeting between Cartwright King and the
 21 Post Office Security/Investigations. They were
 22 brand new service provider and, as I said, it
 23 was literally a meet and greet meeting,
 24 introductions made, presentations given,
 25 describe the teams set up, and so on and so
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1 Mr Pardoe agreed with me that the point of this
 2 meeting was to introduce ourselves to a new firm
 3 of solicitors who we were going to work with in
 4 the future. He didn't think the gung ho
 5 approach of laying down the law in terms of
 6 costs and speed of work, et cetera, et cetera,
 7 was appropriate for that particular meeting.
 8 **Q.** I see. Can we move on, please, to POL00128293.
 9 **A.** May I just say, I don't think Mr Singh was aware
 10 of that, that particular behaviour was -- you
 11 had to demonstrate when you challenge.
 12 **Q.** Yes.
 13 **A.** So that was an example of mine where
 14 I challenged somebody.
 15 **Q.** So that was like a competence or behaviour
 16 related --
 17 **A.** Yes.
 18 **Q.** -- metric --
 19 **A.** Yes.
 20 **Q.** -- where you had to evidence certain
 21 behaviours --
 22 **A.** Indeed, yeah.
 23 **Q.** -- and the behaviour there was challenging?
 24 **A.** Yes.
 25 **Q.** This is, I think, your performance review for
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1 the 2013 to 2014 period. It's dated, somewhere
2 else in the document, 23 May 2014. If we go to
3 page 4, please, about halfway through that box,
4 you say:

5 "I have also subsequently formed part of the
6 Horizon Integrity Working Group, bringing
7 potential Horizon Issues to weekly ongoing
8 conference calls ..."

9 **A.** Yes.

10 **Q.** "... and I have demonstrate leadership qualities
11 in other areas."

12 Yes?

13 **A.** Yes.

14 **Q.** Can you recall who attended the weekly Horizon
15 integrity meetings?

16 **A.** There was myself, from Security, I -- again,
17 from documents I've seen, I think Rob King from
18 Security attended; Andy Haywood, I think, would
19 generally attend in my absence. You had people
20 from retail network, such as Gayle Peacock or
21 Gayle Laverick, Anne Allaker; we had somebody
22 from the Network Business Support Centre; Martin
23 Smith from Cartwright King; Jarnail Singh as the
24 POL lawyer; somebody from Product and Branch
25 Accounting, Andy Winn, I believe; I think the

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1 this there, myself doing this there, Helen Rose
2 doing a report there, Rod Ismay doing that
3 there. This was a good idea to me because it
4 brought everything into one place rather than
5 people working in silos.

6 **Q.** So to get away from siloed working, to bring all
7 knowledge of Horizon integrity issues together
8 in one place --

9 **A.** That was my understanding.

10 **Q.** -- and presumably consider whether any of it
11 needed to be disclosed in current criminal
12 proceedings?

13 **A.** Yes. But, on that particular point, Cartwright
14 King and Jarnail Singh were in attendance and
15 I think it was Bond Dickinson Who subsequently
16 ran the meeting, so there were legal people
17 involved.

18 **Q.** And presumably to consider whether any of it
19 needed to be disclosed in relation to past
20 criminal proceedings?

21 **A.** Yes.

22 **Q.** Can we look at POL00139730. This is a meeting
23 on 19 July 2013 and we can see that you're
24 present --

25 **A.** Yes.

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1 Press Office were invited, I'm not sure they
2 were always in attendance.

3 **Q.** What was the trigger for the setting up of the
4 Horizon integrity meetings?

5 **A.** I can't remember but, having seen the documents
6 I believe there was an email from Susan
7 Crichton, the General Counsel at the time,
8 basically informing stakeholders that she wanted
9 a weekly conference call related to Horizon to
10 capture all issues that are raised or known
11 about, so it was in a sort of central place each
12 week.

13 **Q.** What was the purpose of the Horizon integrity
14 meeting?

15 **A.** I think, (1) to collate all the information in
16 one place.

17 **Q.** Information about what?

18 **A.** Horizon, so any issues, glitches, problems or
19 anything cited in interviews -- in my view, it
20 was anything Horizon related -- so collated into
21 one place, and actions, where applicable, to try
22 to address those things that were raised. And
23 if I could just expand that, my reflections on
24 this Inquiry were that I think you had sort of
25 Mandy Talbot doing this there, Sue Lowther doing

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1 **Q.** -- alongside some of the people you mentioned?

2 **A.** Yes.

3 **Q.** Yes. If we scroll down, please, Rob King:

4 "Outlined the purpose of the meeting; to
5 identify any issues around the integrity of
6 Horizon from a technical perspective and take
7 any necessary action."

8 Would that accurately summarise to you the
9 purpose of the meeting.

10 **A.** Yeah, I think that repeats what I said a little
11 while ago.

12 **Q.** "A process needs to be set up within each
13 directorate where each representative
14 proactively seeks out any technically with
15 Horizon."

16 Do you know what that's meant to say?

17 **A.** Technicality?

18 **Q.** Did that happen, that each Directorate set up
19 a process in which a representative of that
20 Directorate sought out information concerning
21 technical problems -- I'll call them -- with
22 Horizon?

23 **A.** I can't speak for all the people at that meeting
24 but I would imagine so. The only thing I can
25 tell you is what I did, which was communicate to

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1 all Security Investigation Managers, and I can
 2 remember on my email saying "Anything relating
 3 to Horizon that comes across -- comes to your
 4 attention or is referred to in an interview must
 5 be flagged up to me to bring to this particular
 6 meeting each week".

7 **Q.** Just going back up to the cast list, from
 8 Security, is it right that only you and Rob King
 9 were represented?

10 **A.** Yes.

11 **Q.** Was Rob King senior to you?

12 **A.** He was at that stage the Senior Security Manager
 13 for the team that I was in, yes. So Dave Pardoe
 14 was and Rob King subsequently became him.

15 **Q.** So if we scroll back down, please, it says:
 16 "No minutes circulated, but we will be
 17 taking notes."
 18 Were you notetaker?

19 **A.** I was the notetaker --

20 **Q.** Sorry, did you say you were?

21 **A.** I did take notes. I don't know whether -- is
 22 this the first meeting --

23 **Q.** Yes.

24 **A.** Okay. Well, I can tell you my recollection,
 25 which doesn't necessarily correspond to
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1 I think that was the implication.

2 I was not comfortable with that and I was
 3 not comfortable with not sending out minutes
 4 because, if there's no minutes or actions being
 5 sent out and there were no notes to have, then
 6 what was the point of the meetings? It would
 7 just be a chat every week and then we all go our
 8 merry way.

9 So two concerns. One was shredding and
 10 disclosure, et cetera, but the other one was the
 11 practicalities of the meeting.

12 **Q.** Can we break all of that down, then, that
 13 document can come down for the moment.

14 So you attended the first meeting.

15 **A.** Yes.

16 **Q.** Before the meeting, was there any discussion
 17 between you and any other person over whether
 18 a record of the meeting was to be kept?

19 **A.** Not that I can recall.

20 **Q.** Did you, in fact, take a handwritten note of the
 21 meeting?

22 **A.** Yes.

23 **Q.** In what, an Investigator's notebook or something
 24 like that?

25 **A.** No, it was a big yellow A4 pad that I used to
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1 a document or a blog that I've seen, so I can
 2 only tell you what my recollection was.

3 I thought it was the first meeting and I typed
 4 up the minutes and actions and sent them out.
 5 I had my own --

6 **Q.** Sorry, you typed up the minutes and actions?

7 **A.** Yes, which may be this but I'm not quite so
 8 sure. But I typed up the minutes and actions,
 9 sent them out, and then I can remember John
 10 Scott coming to me and I think he was enquiring
 11 how it went, which suggested to me that it was
 12 the first meeting. And, obviously, I'm just
 13 dealing with the minutes and recommendations,
 14 and I can remember him saying to me "No, we
 15 don't want any minutes being circulated", and
 16 I don't know if I'd got my wires crossed but
 17 I was not to keep my handwritten notes: simple
 18 as that.

19 He went away. I was concerned for two
 20 reasons and I relayed those reasons to Jarnail
 21 Singh, the lawyer. I told Jarnail what had
 22 happened and I said to him "I've got two
 23 concerns: number 1, I'm very uncomfortable with
 24 being told to not keep notes", and I don't know
 25 whether the word "shredded" was used, but
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1 use.

2 **Q.** Why did you take the note of the meeting?

3 **A.** The email from Susan Crichton explained what
 4 this meeting was going to be, "Could you all
 5 provide names of attendees to Dave Posnett from
 6 Security". So, yet again, it was myself.
 7 I don't know whether I was told or I took it to
 8 mean that I'm running this meeting, as it were.

9 **Q.** So just going back to the minute that we have
 10 got, POL00139730.

11 **A.** Yeah, can I just raise a query?

12 **Q.** Yes.

13 **A.** If this is the first meeting, given what I've
 14 just said to you, I don't understand it's got
 15 here "No minutes circulated". Well, I'm not
 16 sure I would have put there's no minutes to be
 17 circulated and then I'd have sent the --

18 **Q.** That's what I'm going to ask you about?

19 **A.** That's why I'm --

20 **Q.** It says, "We will be taking notes". Do you
 21 think that's a reference, given that it's
 22 attributed to Rob King, to the Security
 23 Department taking notes?

24 **A.** Yes. But if I prepared these, I wouldn't be --
 25 I don't think I would have been writing "No
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1 minutes will be circulated, here's the minutes".
 2 So this is where I'm a bit confused.
 3 **Q.** There were only two of you from the Security
 4 Department?
 5 **A.** At that particular meeting, yes.
 6 **Q.** Mr King, of the Security Department, is recorded
 7 as saying, "No minutes will be circulated but we
 8 will be taking notes"?
 9 **A.** That's what he said.
 10 **Q.** Does that reflect the fact that you were taking
 11 notes from the Security Department, hence the
 12 "we"?
 13 **A.** Possibly, but I can't remember.
 14 **Q.** So anyway you took a handwritten note?
 15 **A.** Yes.
 16 **Q.** You told us that, subsequently, you were in the
 17 process of writing up a note of the meeting and,
 18 by that, do you mean typing up?
 19 **A.** Yes, I think I'd actually sent the minutes and
 20 then I was told "Don't send the minutes" and,
 21 again, I can remember, "God, what have I done?
 22 I've sent something that I'm now being told
 23 shouldn't have been sent".
 24 **Q.** So John Scott approached you, did he?
 25 **A.** Sorry?

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1 said, it was a case of: if it's written down, it
 2 didn't happen.
 3 **Q.** You said you were uncomfortable with this --
 4 **A.** Yes.
 5 **Q.** -- and you went to see or spoke to Jarnail
 6 Singh --
 7 **A.** Yes.
 8 **Q.** -- and you told him you were uncomfortable?
 9 **A.** Yes.
 10 **Q.** Did you tell him that the implication of what
 11 you had been told by the Head of Security was
 12 that you should shred or destroy your existing
 13 handwritten notes?
 14 **A.** Yes.
 15 **Q.** What did Mr Singh advise you?
 16 **A.** He said keep the notes, don't destroy them,
 17 don't get rid of them, or whatever, which I did.
 18 Then I think at some stage, within a week or --
 19 well, within a week, I think, the next thing
 20 I knew is that I wasn't leading the meeting or
 21 taking notes, Bond Dickinson were now doing it.
 22 And I can remember at that time thinking "Well,
 23 that's fine by me, it's now something that
 24 I don't need to worry about because somebody
 25 else is running it".

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1 **Q.** Mr Scott approached you, did he?
 2 **A.** Yes.
 3 **Q.** You told us that he said two things: one was
 4 about distribution of minutes, correct?
 5 **A.** Yes.
 6 **Q.** And one was about making or keeping
 7 a handwritten note?
 8 **A.** Yes.
 9 **Q.** What did he say about making or keeping
 10 a handwritten note?
 11 **A.** Again, I can't remember the exact words because
 12 it was so long ago. A document I've seen says
 13 that the word "shredded" was conveyed to me, so
 14 I may well have conveyed the word "shredded" to
 15 Mr Singh. It may have been other words but, in
 16 my head, it was pretty much: if it ain't written
 17 down it didn't happen. That's the sort of gist
 18 I was getting.
 19 **Q.** So no matter the precise words used, the essence
 20 of what Mr Scott was saying to you was that
 21 there shouldn't be a record of the meeting
 22 retained?
 23 **A.** That's what I understood it to be, yes.
 24 **Q.** Did he explain why?
 25 **A.** I don't recall, other than that I -- as I've

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1 **Q.** Was it explained why Bond Dickinson were taking
 2 over the note taking?
 3 **A.** It may have been but I can't remember the
 4 reason. I was just pleased that it wasn't me.
 5 **Q.** Was privilege mentioned, legal professional
 6 privilege?
 7 **A.** Not that I recall.
 8 **Q.** Do you know what legal professional privilege
 9 is?
 10 **A.** Legal -- is it the same as legal privilege, that
 11 it's confidential between client and --
 12 **Q.** Yes.
 13 **A.** I know that but I don't recall that being
 14 mentioned.
 15 **Q.** Was that mentioned at all as a reason for them
 16 taking over the note taking, that it might be
 17 protected by legal privilege.
 18 **A.** I don't recall.
 19 **Q.** What did you do with the notes that you had
 20 made?
 21 **A.** I kept them for weeks, months, years. I moved
 22 into a different role in the Post Office then
 23 ultimately I left the Post Office. I don't know
 24 what happened to them, to be honest, but --
 25 **Q.** They were likely disposed of at that time?

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1 **A.** I remember when I left the Post Office trying to
 2 find them, even then. But whatever it was on
 3 the notes, I'd incorporated into the minutes
 4 that I'd sent. So, again, going back to this
 5 blog that I remember, I think it was Simon
 6 Clarke or somebody had said nothing was
 7 destroyed because it was -- well, nothing was
 8 destroyed and it was included in the minutes.

9 **Q.** Can we go back to this note, please,
 10 POL00139730. If we just scroll through the
 11 document, please, and again, please. Thank you.

12 Does that look like the typed note that you
 13 distributed?

14 **A.** It could be. I --

15 **Q.** Go back to the first page, please.

16 **A.** I think when Bond Dickinson took over, the
 17 minutes had their logo at the top.

18 **Q.** Yes, in the top right, yeah.

19 **A.** Yeah.

20 **Q.** So you think this is the typed minute that you
 21 distributed?

22 **A.** Possibly. I think it was the first meeting but,
 23 again, in that blog, I think it says three
 24 meetings in, so I'm not quite sure. But there
 25 was certainly a meeting where I have sent the

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1 But now I don't know what a "Focusonline" is.

2 **Q.** So this is recording you saying that if
 3 subpostmasters want to report an issue, if they
 4 are a current subpostmaster they should use this
 5 email address; if they're a former
 6 subpostmaster, they should use this email
 7 address. Is that right?

8 **A.** I can't remember. I don't think I would have
 9 said they should do. I think these were
 10 channels that were already there, although I may
 11 be wrong.

12 **Q.** If we scroll to Mr Ismay's entry at the foot of
 13 the page there. He says:

14 "Brought this topic to the Operating Board
 15 regarding consequences and impact on the
 16 [Financial Services Centre] Security, etc. One
 17 area of concern was briefing/guidance/training
 18 on hazardous goods ..."

19 The line "Brought this topic to the
 20 Operating Board", what did you understand the
 21 Operating Board to be?

22 **A.** I don't remember. I mean, it sounds like
 23 a senior group of managers type board.

24 **Q.** Did you know what link there was between this
 25 Horizon group meeting and the board or a board

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1 minutes.

2 **Q.** What was Mr Ismay's role in these meetings?

3 **A.** He was from Product and Branch Accounting.
 4 I don't recall him being at many of the meetings
 5 because I think it was mainly Andy Winn from the
 6 same team but, obviously, Product and Branch
 7 Accounting, either received information about
 8 Horizon or were a point of contact to look at
 9 certain things in relation to Horizon.

10 **Q.** If we can scroll through, please. Next page,
 11 please. Thank you. Your entry there, or your
 12 record of you speaking, you're recorded as
 13 saying:

14 "Reporting of issues by current or former
 15 subpostmasters would be through publicised
 16 channels, (Focusonline issue 164 and Intranet
 17 for current subpostmasters, Branch Support Team,
 18 [at an email address] for former subpostmasters,
 19 contract team [at an email address])."

20 What's that mean? What's being recorded
 21 there?

22 **A.** So I think these are the points where
 23 subpostmasters or ex-subpostmasters or whatever
 24 would feed in issues and I think they were the
 25 channels where we would capture the information.

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1 of the Post Office --

2 **A.** No.

3 **Q.** -- ie whether its work was to be reported back
 4 to the board and, if so, how?

5 **A.** I don't recall that, no.

6 **Q.** Moving on a paragraph, Mr Ismay is reported to
 7 have said, "Internet chatrooms -- noted that
 8 chatrooms and forums have sprung up. Origin of
 9 one was Yahoo mail. Local groups/others have
 10 instigated chatrooms re giving advice (perhaps
 11 in good faith). Question -- what can we do
 12 about this? Currently no evidence of forums
 13 being used to give malicious advice to defend
 14 accusations of impropriety."

15 Can you recall what that was about? What
 16 the concern was?

17 **A.** I don't recall but that would suggest to me
 18 that -- it's probably not the right word,
 19 obviously, but I'll use the word "noise" again,
 20 that perhaps there was more discussions about
 21 Horizon in these particular chatrooms or forums
 22 that have sprung up.

23 **Q.** Can we move to page 3, please, and look at your
 24 entry, which is just at the foot of the page
 25 that we can see there. Thank you. You're

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1 recorded as saying that you:
2 "Confirmed that security did not have
3 a master list of all of the issues, unclear if
4 anyone can respond to potential query ...
5 appears there is currently no central point of
6 contact for queries."

7 So this is mid-2013. Was it still the case
8 that there was no central point of contact
9 within Security for Horizon-related questions?

10 **A.** Again, I don't recall but, judging by that, yes.
11 I wouldn't know how that would have been
12 confirmed.

13 **Q.** Was it still the case by mid-2013 that the
14 Security Department of the Post Office still did
15 not have a list of all issues concerning
16 Horizon?

17 **A.** I don't recall.

18 **Q.** What about the Horizon integrity group that had
19 been operating in 2009, we saw from that email
20 earlier?

21 **A.** Yeah.

22 **Q.** Had that not been a group that had been set up
23 to deal with the challenges to Horizon?

24 **A.** It looks as though it was but whether -- I mean,
25 I don't know if it was just a case study or

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1 silos's.

2 **Q.** She was recommending an anti-silo measure --

3 **A.** Right.

4 **Q.** -- in 2005 -- we've explored this in the
5 evidence with her already --

6 **A.** Right.

7 **Q.** -- that there be a coordinated approach that
8 seeks to draw together all of the challenges
9 that there were to Horizon, even in 2005.

10 **A.** In 2005, I was an Investigation Team Manager,
11 so, in all likelihood, I'm not sure I would have
12 been made aware of that.

13 **Q.** What mechanism was put in place for the
14 disclosure of information discussed that went to
15 Horizon integrity issues at these meetings?

16 **A.** I don't know.

17 **Q.** Was there a mechanism?

18 **A.** I don't know. If there was, I would imagine it
19 was Cartwright King or Jarnail Singh or Bond
20 Dickinson, which were the three sort of groups
21 of legal people.

22 **Q.** Was there any discussion at the meetings that
23 you attended of whether these very documents
24 needed to be disclosed on unused material
25 schedules?

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1 to -- I don't know whether it was all Horizon
2 issues.

3 **Q.** What about the team that you mentioned as having
4 been convened or set up in 2009 to deal with
5 Horizon challenges? Do you remember that email
6 from before lunch?

7 **A.** I remember the email but I don't remember the
8 forming of the group or the work that was done.

9 **Q.** Put another way, this wasn't new in 2013, was
10 it?

11 **A.** No.

12 **Q.** There were a collection of challenges to
13 Horizon?

14 **A.** Yes, and I think it was 2013 where Cartwright
15 King were doing their sift of cases, assessing
16 cases.

17 **Q.** Were you aware of Mandy Talbot, in 2005,
18 recommending to a range of senior Post Office
19 figures that a coordinated approach to any
20 Horizon challenges should be maintained, that
21 expert input sought and an independent review be
22 conducted of Horizon?

23 **A.** I don't recall that. If I wasn't aware of that
24 at the time, then that's another example where
25 I've mentioned that people seem to work in

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1 **A.** Not that I recall but would imagine, if those
2 discussions were held, they would be on some of
3 the minutes for some of the meetings.

4 **Q.** Thank you. Can we move on to a different topic,
5 please. Can we look, please, at POL00118096.
6 Can you see an email at the top of the page from
7 Mr Wise to Mr Stanway and then, if we scroll
8 down, please, to foot of the page, an email from
9 you to lots of people in May 2011.

10 **A.** Yes.

11 **Q.** Just looking generally at that group of people
12 as at that date, May 2011, who are those people?

13 **A.** They are Dave Pardoe, the Head of the --

14 **Q.** Without going through them individually?

15 **A.** Sorry, investigation-related people.

16 **Q.** So they're Investigation Managers or managers of
17 Investigators?

18 **A.** Yes.

19 **Q.** The function that you were performing in May
20 2011 was?

21 **A.** Accredited Financial Investigator.

22 **Q.** Why were you sending an email out about casework
23 compliance?

24 **A.** I think it was because we had a North team and
25 a South team and the whole of the South team

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1 left. So we were getting a whole new South team
 2 from outside the business.
 3 **Q.** A team of whats, Accredited Financial
 4 Investigators?
 5 **A.** No, Security/Investigation Managers.
 6 **Q.** But what had that got to do with you? You were
 7 an AFI at this time?
 8 **A.** Yeah, it's another example of: can we get
 9 involved in this? The idea was the new people
 10 who came in, the compliance would be for them to
 11 ensure consistency in the work they did.
 12 **Q.** You write:
 13 "Most of you are aware that case files
 14 submitted for legal advice will become subject
 15 to compliance checks. This process is due to
 16 commence in June and is designed to raise
 17 standards of files submitted (including their
 18 contents reports, taped summaries, appendix
 19 enclosures, recovery stakeholders, etc) and
 20 ensure there is a consistent approach across the
 21 team. It is probably an opportune time, given
 22 we have recently recruited new people to the
 23 team.
 24 "I've associated relevant documents that
 25 feed into compliance. Please familiarise
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1 **Q.** Do you recognise this document?
 2 **A.** I don't recognise the document.
 3 **Q.** You sent an instruction out to a large number of
 4 members of the Security Team telling them to
 5 familiarise themselves with, amongst other
 6 things, this document?
 7 **A.** Yes.
 8 **Q.** Presumably, at the time, in 2013, you were
 9 familiar with this document. You wouldn't be
 10 asking 20-odd members of the Security Department
 11 to familiarise themselves with it if you
 12 yourself weren't familiar with it?
 13 **A.** Well, I don't remember this document. I don't
 14 remember sending it out and I don't remember any
 15 responses.
 16 **Q.** I've asked a slightly different question, which
 17 is: given that you did send it out and given
 18 that you did instruct people to familiarise
 19 themselves with it, presumably you would have
 20 been familiar with it?
 21 **A.** I would -- when I was an Investigator, which
 22 goes back to 2000/2004, I would have been
 23 familiar with the identification codes. If
 24 I was attaching a document to send to them,
 25 I wouldn't necessarily have opened it up because
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1 yourself with these documents.
 2 "Myself and Paul will be attending each ..."
 3 "Security Operations Team", is that?
 4 **A.** Yes.
 5 **Q.** "... meeting [North, Central and South, and the
 6 dates are given].
 7 "Happy to discuss ..."
 8 We can see from the top of the page, if we
 9 scroll up, that that included a zip file, your
 10 email --
 11 **A.** Yes.
 12 **Q.** -- as an attachment, the zip.
 13 **A.** Yes.
 14 **Q.** We know what's in the zip file. Can you start
 15 by telling us what the purpose of you sending
 16 out this suite of case compliance documents was?
 17 **A.** Yes, so if we were reintroducing compliance,
 18 I was sending out the compliance documents that
 19 were in force some years previously, so that all
 20 the Investigation Managers knew what was going
 21 to be assessed in terms of the compliance.
 22 **Q.** Can we look at POL00118104, please. One of the
 23 attachments to the email within the zip file was
 24 this document.
 25 **A.** Yes.
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1 the identification codes are the identification
 2 codes.
 3 **Q.** Why? You said in your email that you'd be happy
 4 to discuss the contents with them?
 5 **A.** And if they want to discuss the contents,
 6 I would have discussed them.
 7 **Q.** So, what, you would have sent blind some
 8 attachments to an email saying "Familiarise
 9 yourselves with these, your compliance with them
 10 is going to be checked. I'm happy to discuss
 11 the contents with you", without looking what was
 12 in the contents?
 13 I mean, just ignoring the content for the
 14 moment, and don't let that colour your answers,
 15 do you really think that's so?
 16 **A.** I've wracked my brains over this document.
 17 I think I either didn't read it or I skim read
 18 it and didn't take on board what was in it or
 19 I thought this was the up-to-date version of
 20 that form but, on reflection, it's not
 21 an official form. So that would be why there
 22 wasn't a more up-to-date version of it. I hope
 23 it's not the third of that scenario.
 24 **Q.** Sorry, I missed the second of those
 25 possibilities.
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1 **A.** Either didn't read it, or I read it quickly just
 2 to make sure it was codes, or I thought this was
 3 the latest version. But it's not an official
 4 Post Office form because it hasn't got number at
 5 the bottom. So, I mean, at the end of the day,
 6 I can't remember the form. I may have used this
 7 form but it was so long ago.

8 **Q.** Looking at it now, what do you think the purpose
 9 of the form was?

10 **A.** I think I put in my statement that it was used
 11 to complete an NPA1 form.

12 **Q.** Cutting through it, what do you think the NPA1
 13 form was for?

14 **A.** I think that was to notify the police in the
 15 event that somebody pleaded guilty or was
 16 convicted, to update their records.

17 **MR BEER:** Sir. Apologies, if we just pause there,
 18 I think the two to three minutes of noise has
 19 just started.

20 **SIR WYN WILLIAMS:** All right. Well, I'll remain in
 21 my chair but I'll take myself off screen.

22 **MS SCOTT:** In fact, sir, what we could probably do
 23 is, if we broke until 3.10, we could probably
 24 take an afternoon break early.

25 **SIR WYN WILLIAMS:** All right that's fine. 3.10.
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1 I also don't remember any of the other forms,
 2 other than the score sheet one that I've seen.

3 **Q.** The Excel spreadsheet --

4 **A.** Yes.

5 **Q.** -- which contains a score out of 100 --

6 **A.** Yes.

7 **Q.** -- with a series of columns and rows --

8 **A.** Yes.

9 **Q.** -- marking you on things, ranging from the font
 10 that you use, to an adequate summary of the
 11 interview that you conducted?

12 **A.** That's correct, and I think that was an old
 13 compliance set of documents, I think I've
 14 just -- I don't know whether someone has emailed
 15 to me or they've been on an old team drive or
 16 SharePoint site, or they were on my computer.
 17 But I think I've lifted them from wherever and
 18 sent them out to the people on the email.

19 **Q.** So would you just put this down to being sort of
 20 a single email that you distributed that you
 21 sent out, containing a document that you didn't
 22 pay much attention to, and that's why you didn't
 23 pick up what might be described as grossly
 24 offensive racial profiling within it?

25 **A.** That's one possibility.
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1 **MR BEER:** Thank you, sir.

2 **(2.55 pm)**

3 **(A short break)**

4 **(3.10 pm)**

5 **MR BEER:** Sir, good afternoon, can you see and hear
 6 us?

7 **SIR WYN WILLIAMS:** Yes, thank you.

8 **MR BEER:** Thank you.

9 Mr Posnett, I'd shown you an email of May
 10 2011, with you distributing to a wide range of
 11 people within the Security Department the
 12 Identity Codes document, amongst others, yes?

13 You said that you don't remember sending the
 14 email and you don't remember looking at the
 15 contents of the document --

16 **A.** Yes.

17 **Q.** -- but that you think that you were either
 18 distributing the contents without looking at any
 19 of them or, insofar as you looked at them, you
 20 assumed that this ID codes document was
 21 an updated version of something that went
 22 previously; have I got that right?

23 **A.** One of the possibilities I thought was it's the
 24 most up-to-date version or that there hasn't
 25 been another one, so that's what it is. But
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1 **Q.** We're in possession of a -- I'm not going to
 2 take you to them in the interests of time, I'll
 3 list them for the transcript -- but we're in
 4 possession of a series of emails of you
 5 redistributing that document --

6 **A.** Yes.

7 **Q.** -- time and again?

8 **A.** Yes.

9 **Q.** On 29 March 2012, POL00115665; on 27 April 2012,
 10 POL00121810; on 1 May 2012, POL00121816; on
 11 31 May 2012, POL00121843; on 16 June 2012,
 12 POL00120956; and on 21 September 2012,
 13 POL00121913.

14 So, by my count, you distributed it seven
 15 times in 2011 and 2012.

16 **A.** I thought I'd sent it three times, but ...

17 **Q.** Okay, well, let's not go into that for the
 18 moment. No doubt, if any of my references or
 19 dates are wrong, that can be picked up in due
 20 course. Is it really the case that, on every
 21 occasion you were sending out to different
 22 members of the Security Team a document telling
 23 them that they needed to comply with its
 24 contents, that you didn't know what you were
 25 sending out because you didn't look at it?
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1 **A.** Yes, because -- well, if the first time I sent
 2 the email I didn't look at it, I would have
 3 thought the second and third time -- if it is
 4 three -- I wouldn't have looked at it because
 5 I'd have thought "Well, I'm just sending out the
 6 same email that I sent before".

7 **Q.** Wouldn't you have wanted to check what you were
 8 sending out was appropriate for all of these
 9 people to have to comply with its terms?

10 **A.** I would say yes but, again, this -- my day job
 11 was Accredited Financial Investigator. I don't
 12 know the details but I would imagine myself and
 13 Paul were asked to reintroduce compliance
 14 checks. So, again, it wasn't my day job.
 15 I think I would have just picked up the
 16 documents and sent them out.

17 **Q.** Looking at the document now, what do you
 18 understand its purpose to be?

19 **A.** For use when completing the NPA1. That's the
 20 only reason I can think as to why we had
 21 identification codes and I think identification
 22 codes existed on the offender report templates
 23 from when I first started investigations.

24 **Q.** So the NPA1 -- we can go through a lot of
 25 documents to work out that, in fact, I think it

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1 **A.** I believe so, and if it wasn't that NPA form
 2 then I don't know why we --

3 **Q.** We'll go through those forms in a moment. Does
 4 it follow that the codes that needed to be used,
 5 if they were to be notified to the police
 6 service, needed to be the police service's
 7 codes.

8 **A.** That would make sense, but ...

9 **Q.** Do you believe, then, that these were the police
 10 service's codes in 2011 and 2012?

11 **A.** I don't know.

12 **Q.** Before we look at that series of NPA forms, can
 13 we look at POL00126594. There's a no on that.
 14 I'll try an alternative reference, if you
 15 just give me a moment. POL00126735. If we go
 16 to page 3, please, at the top, do you remember
 17 we looked at this earlier, it's your appraisal
 18 document, I think, for 2012. You say in box 13
 19 at the top:

20 "Due to the agreement that a colleague would
 21 conduct all compliance checks on case file
 22 submissions, I met with him and handed over all
 23 operate documentation and explained the process
 24 and recording/monitoring mechanisms associated
 25 with the compliance process. I also checked the

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1 was the NPA3 that was the report but it doesn't
 2 matter -- a form that was used to report matters
 3 to the police service; is that right?

4 **A.** Yes.

5 **Q.** It's essentially what you're --

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

7 **Q.** -- referring to. What was the purpose of
 8 reporting some information to the police?

9 **A.** Well, the Post Office conducted, in effect,
 10 private prosecutions. So we had to notify the
 11 police, so that they could put it on their
 12 national system, any convictions.

13 **Q.** Was it at the point of conviction you understood
 14 that the notification was to occur?

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

16 **Q.** When you say on their national system, do you
 17 mean the Police National Computer?

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

19 **Q.** So to summarise what your belief was, it was
 20 necessary to set out on a form that was sent to
 21 the police, at the point of conviction; is that
 22 right?

23 **A.** Yes.

24 **Q.** The identity code of a convicted person to
 25 include on the Police National Computer?

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1 first few compliances undertaken, to ensure
 2 consistency and understanding and thus enable
 3 a smooth transition of the process to this
 4 colleague."

5 Is the colleague there Andrew Wise?

6 **A.** I don't know.

7 **Q.** We see in other emails that your case compliance
 8 check email, including the ID codes document, is
 9 subsequently, after the end of September 2012,
 10 distributed by Andrew Wise and not by you.

11 **A.** Yes.

12 **Q.** Do you think this handover you were talking to
 13 here was with him?

14 **A.** I don't know but it could be because I think
 15 Andrew was a temporary team leader, which would
 16 make sense, because he would do the compliance
 17 checks on the Investigators.

18 **Q.** But here you're talking about a meeting with
 19 that person, handing over all appropriate
 20 documentation to them and explaining the
 21 process. Presumably you looked at the suite of
 22 documents, I think there are only eight of them,
 23 in the case compliance material --

24 **A.** Yeah.

25 **Q.** -- on this occasion?

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1 A. Again, I don't remember it, but if I'd have
 2 emailed it to him, as we've seen, I don't see
 3 why I would have had a meeting with him and
 4 handed over all the documentation.
 5 Q. You're claiming as part of your appraisal that
 6 you did?
 7 A. Yes, if he's the colleague.
 8 Q. Sorry?
 9 A. If he's the colleague.
 10 Q. Yes. Well, whoever the colleague is -- we'll
 11 call him Mr X -- you met with Mr X and handed
 12 over all the documentation for case compliance,
 13 explained the process to them, explained the
 14 recording and monitoring mechanisms associated
 15 with them and then checked the first few
 16 compliances undertaken. You must have looked at
 17 the ID codes document then?
 18 A. Well, all I can say is that I don't remember.
 19 Q. But looking at these words that you were
 20 claiming credit for in your personal appraisal,
 21 you agree that you must have done?
 22 A. Well, it says I've handed over appropriate
 23 documents. I can't say what --
 24 Q. Well, not just that you've handed over the
 25 document. You've explained the process to him,

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1 A. We didn't have Teams meetings then.
 2 Q. Okay, so when it says, "I met with him", does
 3 that mean "I didn't meet with him; I spoke with
 4 him on the phone"?
 5 A. I don't know what it means; it's 10 years ago.
 6 Q. Put aside the content, Mr Posnett -- I realise
 7 why you might find the content of the ID codes
 8 difficult -- and just focus on what you said in
 9 your personal appraisal here.
 10 A. Yeah, I genuinely cannot remember it. I don't
 11 remember who the colleague was, how the meeting
 12 went. If I do, I would say so.
 13 Q. Looking at these words, do you think it's likely
 14 that you went through the documentation with
 15 him, Mr X? Put aside whether it was Andrew Wise
 16 or not.
 17 A. I don't know.
 18 Q. And you think you might have sent it out seven
 19 times, the ID codes document, if my calculations
 20 are correct, without looking at the contents?
 21 A. It's possible but I don't know.
 22 Q. Can we look, please, at POL00038495. If we just
 23 look at the foot of the page, the policy title
 24 is "Reporting of Criminal Offences to Police"
 25 and, if we go to the top, please, it's part of

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1 Mr X, you've explained the recording and
 2 monitoring mechanisms associated with
 3 compliance --
 4 A. Yes.
 5 Q. -- and you checked the first few compliances
 6 undertaken?
 7 A. Yeah.
 8 Q. You must have looked at the ID codes document
 9 then, mustn't you?
 10 A. Not necessarily. I've handed over the
 11 documentation, explained the process and
 12 recorded monitoring mechanisms, and also checked
 13 the first few compliances undertaken, so it
 14 doesn't necessarily mean I've rechecked that
 15 form. I may have done but I can't remember.
 16 Q. You've got eight documents in front of you.
 17 You're sitting with a colleague who is going to
 18 take over this job from you?
 19 A. Yeah.
 20 Q. You're handing over the documentation to them.
 21 You're explaining the process to them.
 22 A. I don't know if I am sat with them, it might
 23 have been online or on the telephone, I don't
 24 know.
 25 Q. Or it might have been a Teams meeting?

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1 an investigation policy and it seems that it's
 2 appendix 15 to it.
 3 If we look at paragraph 3.1, the policy on
 4 reporting of criminal offences to the police
 5 says:
 6 "The development of the Phoenix National
 7 Criminal Justice Record Service has enabled the
 8 Association of Chief Police Officers (ACPO)
 9 Disclosure Group to design national standardised
 10 forms for the reporting of offences and the
 11 results of prosecutions/cautions to Police
 12 Authorities.
 13 "These standard forms, which are designed
 14 for use by all Non-Police Prosecuting Agencies
 15 (NPAs) have been provided to all Security
 16 Managers.
 17 "Form NPA1 -- source Input Document for
 18 Phoenix.
 19 "NPA2 -- continuation Sheet for additional
 20 offences.
 21 "NPA3 -- Notification of result of case (PSO
 22 use only)."
 23 Do you know what PSO was?
 24 A. Prosecution Support Office, maybe?
 25 Q. So the NPA1 form is the Source Input Document

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1 for Phoenix. Do you remember what Phoenix was?
 2 **A.** No.
 3 **Q.** Do you remember an intelligence system that was
 4 different from the Police National Computer?
 5 **A.** No.
 6 **Q.** But NPA3 is the notification of the result form,
 7 yes?
 8 **A.** Yes.
 9 **Q.** If we go down to 3.2.
 10 "During the course of a suspect interview,
 11 investigators should complete the offender
 12 details on side 1 of form NPA1 ..."
 13 Can you see that?
 14 **A.** Yes.
 15 **Q.** "... and all of side 2, which deals with the
 16 identification details of the [case]."
 17 So the Investigator was required to fill out
 18 the NPA1 form at the point of interview; is that
 19 right?
 20 **A.** That's what it says, yes.
 21 **Q.** So, although you recalled that the form to which
 22 the ID code is document related was about
 23 reporting convictions, that doesn't seem right,
 24 according to this, does it? Convictions is the
 25 NPA3 form; NPA1 form is at the point of

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1 **Q.** Who would be responsible for generating these
 2 NPA1 forms, the Criminal Law Team or the
 3 Investigator?
 4 **A.** I thought it was the Investigator.
 5 **Q.** Can we look, please, at POL00062566. Can we see
 6 that this is an NPA1 form, if we just scroll up
 7 a little bit, in the top right-hand side, top
 8 right-hand corner. Thank you. Yes?
 9 This is an example of an NPA1 form, yes?
 10 **A.** Yes.
 11 **Q.** Does this ring any bells?
 12 **A.** It rings a bell.
 13 **Q.** Can we look at page 2, please. Can you see that
 14 at the top of the page -- no, they've been
 15 redacted. At the top of the page there's a box
 16 entitled "Ethnic Appearance"?
 17 **A.** Yes.
 18 **Q.** There were, I can tell you, underneath that box,
 19 seven boxes, one which said, "White European";
 20 the second, which said, "Dark European"; the
 21 third is "Afro-Caribbean"; the fourth is
 22 "Asian"; the fifth is "Oriental"; the sixth is
 23 "Arab"; and the seventh is "Unknown", yes?
 24 **A.** Okay.
 25 **Q.** Was the intention that an Investigator completed

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1 interview?
 2 **A.** Agreed, yeah.
 3 **Q.** Can we look, please, at POL00121116. Do you
 4 remember this, a case progression map?
 5 **A.** I don't recall that, no.
 6 **Q.** Can we go to the last page of the document and,
 7 under "Acquiring AS Number" -- do you remember
 8 what an AS number was?
 9 **A.** Was that something to do with the summons?
 10 **Q.** It may be, an arrest summons or a summons for
 11 arrest?
 12 **A.** Right.
 13 **Q.** Anyway, "Acquiring the AS number", the
 14 instruction is to:
 15 "Update the front of the NPA1 form with the
 16 date of the court hearing and details of the
 17 court.
 18 "Complete the offence and the method used in
 19 the offence section ...
 20 "Email the updated NPA1 ... to the Casework
 21 Team."
 22 Do you agree that it seems that an NPA1 form
 23 was required for a Magistrates Court to issue
 24 a summons?
 25 **A.** It looks that way, yes.

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1 the ethnic appearance part of this form by
 2 reference to the ID codes document that we
 3 looked at?
 4 **A.** I thought that's what would be used to complete
 5 this form. However, if you scroll to the top of
 6 this NPA1, it's got there "Form NPA1, 1/97", so
 7 if this form goes back to 1997, even then what
 8 you've read out doesn't correlate to the form
 9 that I sent out.
 10 **Q.** Do you know why that is?
 11 **A.** Why?
 12 **Q.** Why the Post Office was circulating -- why you
 13 were circulating a form that didn't correlate to
 14 at least the 1997 edition of the NPA1 form?
 15 **A.** I don't know.
 16 **Q.** Would Investigators have to refer back to the ID
 17 codes document in order to complete this
 18 document or the bit of it that concerns ethnic
 19 appearance?
 20 **A.** Not necessarily.
 21 **Q.** Why so?
 22 **A.** Well, I think when I became an Investigator,
 23 I had to go as a second officer on jobs with
 24 experienced people and they'd send me their
 25 reports so you'd see the codes on the reports,

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1 and I think, over time, you get used to the
2 codes and know what they were without having to
3 refer to a form.

4 **Q.** So what was the purpose of the circulation of
5 the ID codes document, then?

6 **A.** Because, on the compliance, when you did
7 a suspect offender report, one of the sections
8 on the template was the identification code so
9 that was a point of reference if they needed to
10 find out the code or they could ask someone, or
11 Google it or whatever.

12 **Q.** When you say "or Google it", what would they
13 Google?

14 **A.** Identification code.

15 **Q.** What would they find if they Googled
16 identification code?

17 **A.** I don't know because I haven't Googled it.

18 **Q.** Would they find the Post Office Identity Codes
19 document?

20 **A.** I doubt it very much.

21 **Q.** They would find some other organisation's
22 identity codes, Police Scotland or --

23 **A.** Possibly, yes.

24 **Q.** -- the ACPO Identity Codes document, or the
25 National Crime Agency, if they even put those

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1 linked. It goes to the police.

2 **Q.** That can come down thank you.

3 Were statistics kept on the identities of
4 the racial and ethnic identities of people
5 investigated by the Post Office?

6 **A.** Not that I recall.

7 **Q.** Was there any central repository where any
8 information was stored and any analysis
9 undertaken of it?

10 **A.** Not that I recall.

11 **Q.** So why was the Post Office maintaining its own
12 list of ID codes, which didn't match that of the
13 police?

14 **A.** I don't know.

15 **Q.** You were distributing it and telling people that
16 their compliance with it would be marked. Why
17 were you doing that?

18 **A.** Because that was part of the compliance forms
19 that I would have picked up from whatever year
20 it was.

21 **MR BEER:** Sir, those are the only questions that
22 I ask Mr Posnett. I think there are some
23 questions from the Howe+Co team.

24 **THE WITNESS:** Can I just say one thing on that?

25 **MR BEER:** Yes.

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1 online?

2 **A.** Yes.

3 **Q.** That wouldn't be very helpful, would it, if they
4 were willing out a Post Office form -- ie, the
5 jacket to the -- or the front page, the
6 frontispiece of the offender report, looking up
7 somebody else's ID codes to fill it in wouldn't
8 be that helpful, would it?

9 **A.** No, but I'm not aware as to all those different
10 companies you've mentioned have different
11 codings. I don't know.

12 **Q.** Do you think they were the same as the ID codes
13 document we've looked at?

14 **A.** I don't know.

15 **Q.** Are you suggesting that we can really put this
16 ID codes document to one side because
17 Investigators would just go online and Google
18 "ID codes" in filling out forms?

19 **A.** If they Googled it, I imagine it would be police
20 ID codes.

21 **Q.** Yes, and why would they want to use police ID
22 codes in filling in the part of the offender
23 report that asks them to identify somebody's
24 ethnic appearance?

25 **A.** Because I think, as I said, this form is police

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1 **THE WITNESS:** That form is the form that's given me
2 most grief in relation to this Inquiry and it's
3 not even Horizon related. I don't remember the
4 form. I think it's a very old form but,
5 clearly, I've sent it out and, on reflection,
6 I shouldn't have. And I can only apologise.
7 I certainly didn't mean to cause any offence.

8 **MR BEER:** Thank you.

9 Sir, there were some questions from Howe+Co.

10 **Questioned by MR STEIN**

11 **MR STEIN:** Mr Posnett, my name is Sam Stein. I'm
12 just going to ask you a few questions on behalf
13 of the Howe+Co clients. Howe+Co represent
14 a very large number of subpostmasters and
15 mistresses.

16 I'm going to take you directly, please, to
17 a document that we've asked the Inquiry to put
18 up on the screen and be available and it is
19 POL00098520.

20 If we can go to the second-to-last page,
21 please, of that document -- yes, we have it --
22 and scroll down a little bit underneath the "We
23 now have a Spot Review -- SR022".

24 Mr Posnett, let's orientate ourselves around
25 this document, just to familiarise yourself with

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1 it, because no doubt it's been a little bit of
 2 time since you've seen this: 9 June 2013. Okay?
 3 **A.** Yeah.
 4 **Q.** So this is in the same period of time where
 5 you've been asked questions by Mr Beer, who has
 6 asked you questions today so far, and you are
 7 dealing with the Integrity Group at that stage;
 8 okay?
 9 **A.** Yes.
 10 **Q.** This from Simon Baker, dated 9 June to Andrew
 11 Parsons, Andrew Winn, Craig Tuthill, and then
 12 yourself and, after that, Gareth Jenkins and
 13 others. You'll see there it says:
 14 "We now have a Spot Review -- SR022."
 15 Going on to say:
 16 "Please can you come to the dial-in on
 17 Wednesday having reviewed and your comments on
 18 how to approach this one."
 19 Going to on to say:
 20 "Pete, it would be good if you could join us
 21 so we can get the request in to Fujitsu for the
 22 XML data, so it is ready for when Gareth when he
 23 gets back."
 24 All right? Can you just try and help us
 25 a little bit with what was going on at this
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1 cascaded those documents to the people on the
 2 call but I can't remember.
 3 **Q.** Okay. If we scroll up, please, to the top of
 4 this document, we'll see then the way that this
 5 was dealt with, and you'll see, Mr Posnett, that
 6 you're at the top.
 7 **A.** Yes.
 8 **Q.** So this is 12 June 2013 and you'll see then the
 9 reference under "Subject" to the documents SR021
 10 and 022, and they're referred to as attachments.
 11 Helping us a little bit in relation to this,
 12 from your perspective, who was Simon Baker,
 13 Andrew Winn -- who was Simon Baker?
 14 **A.** Simon Baker, I can't remember, other than he was
 15 a senior manager. Andy Winn worked, I believe,
 16 in Product and Branch Accounting and I think his
 17 boss was Rod Ismay.
 18 **Q.** Then going down we see your title, Accredited
 19 Financial Investigator, at the Security Team?
 20 **A.** Yes.
 21 **Q.** Your boss being Mr Scott; is that right?
 22 **A.** Not my direct boss but he was the Head of
 23 Security, yes.
 24 **Q.** Head of?
 25 **A.** Yes.
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1 stage. When it says, "We now have a Spot
 2 Review", then a number is given, the number
 3 appears to relate to a document we'll see in
 4 a minute, but then it goes on to say:
 5 "Please can you come to the dial-in on
 6 Wednesday having reviewed and your comments on
 7 how to approach this one."
 8 What was that about? What was this Spot
 9 Review about?
 10 **A.** Okay, I was asked on the Royal Mail questions
 11 whether I had any involvement with Second Sight,
 12 and I think my response was I don't recall being
 13 involved with Second Sight, and then I received
 14 further documentation that's spoke about these
 15 Spot Reviews, which were in relation to Second
 16 Sight. So I completely forgot about those and
 17 I don't remember.
 18 I think my recollection now of the Spot
 19 Reviews were there were a selected number of
 20 post offices that this group of people were
 21 going to review and I think what I did in
 22 relation to the cases was obtain the suspect
 23 offender report and perhaps the interview
 24 summary, so I could speak from a Security
 25 perspective at these meetings. I may have
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1 **Q.** From your perspective, your most senior boss?
 2 **A.** Yes.
 3 **Q.** Right. Just staying for a moment with this, if
 4 we go down a little bit further, we'll see that
 5 the reference is, further down that page, from
 6 Dave Posnett, sent 10 June to Simon Baker,
 7 you're then referring to, it seems, the
 8 documents, and this is -- these were issues with
 9 scratchcards and problems that related to the
 10 use of scratchcards within particular branches.
 11 That seems to be what the documents were about?
 12 **A.** Yes.
 13 **Q.** Okay. If you go to the second -- well, yes, the
 14 second main paragraph that starts "I ran
 15 a number of intervention/education initiatives",
 16 and then go to the end of that paragraph, which
 17 finishes with "There were many out shortages and
 18 scratchcard holding concerns that seemed to
 19 highlight other problems at branches."
 20 Do you see that?
 21 **A.** Sorry, which paragraph?
 22 **Q.** Certainly. So the second page, please, of the
 23 document. Go a bit further down, go back up.
 24 Right, thank you. If you read down from what
 25 you have in front of you, you have three
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1 paragraphs there and you'll see the third
2 paragraph:

3 "Also in the file is my (then) monthly
4 holdings overview spreadsheet."

5 Yes?

6 **A.** Yes.

7 **Q.** At the end of that paragraph, it says:

8 "There were many audit shortages and
9 scratchcard holding concerns seemed to relied
10 other problems at branches."

11 **A.** Yes.

12 **Q.** Now, this, therefore, goes back, it seems, to
13 around 2010 period of time, so that's when
14 you'll see that this document and your
15 investigation into this area, the problems with
16 scratchcards, seemed to take place. Starting
17 first of all in 2010, when you came across
18 issues such as this, people having problems with
19 the use of scratchcards, that causing -- it
20 seems to highlight other problems at branches,
21 what was the system at that stage, 2010? Was
22 there a central place to go and look to see
23 whether other people were having these sorts of
24 problems, was there a central place to report
25 this into so you could see the volume of

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1 activate the lot, so it's all of a sudden
2 £10,000 worth of value scratchcards and, if they
3 got stolen, they're worth a lot of money,
4 whereas, if they weren't activated, they're
5 worthless.

6 **Q.** The question I'm asking you -- I understand, we
7 can see, in fact, from this document why it is
8 there's an issue in relation to scratchcards.
9 But when you're finding problems in the course
10 of your work, my question is: was there a way of
11 establishing a bank of these issues? There must
12 have been some system, is what we're trying to
13 find out, Mr Posnett.

14 **A.** I don't know, but the sentence there said "There
15 were many audit shortages and scratchcard
16 holding concerns seemed to highlight other
17 problems at branches". If there was such
18 a database, it sounds to me like it would be the
19 Audit Team who may have it. But I don't know,
20 is my answer.

21 **Q.** In relation to such issues as this, when you're
22 doing the investigation, did you routinely
23 contact the different Area Branch Managers and
24 similar and say "Well, actually this something
25 we've encountered"? Was there a way of

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1 problems across the system? So 2010, to start
2 off with.

3 **A.** I don't recall there was a central place to
4 record those sort of problems.

5 **Q.** From your perspective, at this particular time
6 in 2010, can you help us understand why there
7 wasn't something? Why there wasn't a library or
8 some way you could establish what was going
9 across the system?

10 **A.** Right.

11 **Q.** Did that not exist?

12 **A.** I don't believe so. In relation to scratchcards
13 they were an anomaly because I think they were
14 the only stock item that had to be activated on
15 a Lottery terminal before they became value
16 stock and they had to be remmed in. Every other
17 item of stock, from recollection, was just
18 remmed in and it was already there as value
19 stock.

20 So it was different and I think some
21 subpostmasters struggled to understand that.
22 So, for example, if a branch received £10,000
23 worth of scratchcards, the idea would be that
24 you activate one pack, £200, to sell, or two
25 packs, £400 to sell. But a subpostmaster might

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1 spreading information amongst the branches, in
2 that sense, within the management of the
3 branches?

4 **A.** Not from my perspective because the Fraud Risk
5 programme that I was running in this case
6 related to scratchcards. The other problems
7 noted came out of audits. So the Audit Team
8 would be aware of these other issues.

9 **Q.** Right. So to the extent that you're able to
10 help us with that at the moment there's an issue
11 here of being siloed into different parts of the
12 system?

13 **A.** Yes.

14 **Q.** Okay. Then in 2013, when this is being looked
15 at, you think as part of Second Sight and their
16 investigations --

17 **A.** The Spot Reviews?

18 **Q.** Yeah, the Spot Reviews.

19 **A.** From what I've seen and read, yes.

20 **Q.** Had things changed by that point? Had there
21 been a system then established to establish
22 a bank of problems/issues that were uncovered?

23 **A.** I don't know but, obviously, we've seen there
24 was this Horizon Integrity Group here and that
25 one there and that one there. So I don't know.

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1 **Q.** Lastly, as regards Mr Scott, you referred to him
2 earlier in your evidence as being the individual
3 who suggested that notes shouldn't be kept.
4 You, in fact, discussed this with Mr Singh,
5 saying that -- using the word "shred" in
6 relation to getting rid of documentation. Did
7 you take this up with Mr Scott? Did you say,
8 "Mr Scott, sorry, but I think this is not really
9 something that I can possibly do"? Did you
10 challenge him on this?
11 **A.** I didn't. Number 1, I didn't find him very
12 engaging; number 2 he didn't like to be
13 challenged; and number 3 I think there was
14 a sort of culture of fear, hence I opted to tell
15 Mr Singh.
16 **Q.** When you say "a culture of fear", are you
17 talking about, on the one hand, being directly
18 threatened, or are you talking about another
19 type of fear?
20 **A.** Not directly threatened, but you didn't want to
21 get on the wrong side of him.
22 **Q.** What would he do to you?
23 **A.** Well, my last year in Security was a nightmare.
24 I thought I was being bullied and harassed.
25 I think I know where that was coming from but

1 **MR BEER:** Yes, that's right, sir.
2 **SIR WYN WILLIAMS:** Thank you.
3 **MR BEER:** Thank you very much, sir.
4 (3.50 pm)

(The hearing adjourned until 10.00 am
the following day)

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1 I could never prove it, and I think I was --
2 a number of people over the years who left
3 Security, or who were, in effect, forced to
4 leave Security.
5 **Q.** Not exactly a way to manage security concerns so
6 that people feel that they can raise concerns or
7 difficulties, or challenge authority or, indeed,
8 ensure that there's an honest and competent
9 response by the Post Office, agreed?
10 **A.** I agree but that is my take on it.
11 **MR STEIN:** One moment, please.
12 Thank you, Mr Posnett.
13 **A.** Thank you.
14 **SIR WYN WILLIAMS:** Anyone else?
15 **MR BEER:** No, sir.
16 **SIR WYN WILLIAMS:** Well, thank you, Mr Posnett, for
17 giving evidence to me over two days.
18 Admittedly, yesterday was a bit shorter but it
19 was still a fairly hefty session. So thank you
20 very much for answering so many questions and
21 thank you also for your detailed witness
22 statement, which provoked so many questions.
23 **THE WITNESS:** Thank you, sir.
24 **SIR WYN WILLIAMS:** We will adjourn now and start
25 again at 10.00, yes?

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