

Tuesday, 12 December 2023

1
2 (10.00 am)
3 **MR BEER:** Good morning, sir, can you see and hear
4 me?
5 **SIR WYN WILLIAMS:** Yes, I can, thank you.
6 **MR BEER:** May I recall Rob Wilson, please.
7 **ROBERT GEORGE WILSON (sworn)**
8 **Questioned by MR BEER**
9 **MR BEER:** Thank you very much, please do sit down,
10 Mr Wilson.
11 Thank you very much for attending for
12 a second time today to give evidence. We're
13 very grateful to you.
14 Thank you also for devoting the time to
15 produce a second witness statement for the
16 Inquiry. If we can look at that, please, it's
17 27 pages long, excluding the index to the
18 exhibits. It's dated 15 November 2023 and it
19 should be at your tab A1 in the bundle. For the
20 transcript the URN is WITN04210200. If you turn
21 to the 27th page, please.
22 **A.** Yes, I've got it.
23 **Q.** Is that your signature?
24 **A.** There isn't a signature there, would you like me
25 to sign it?

1

1 you?
2 **Q.** With that correction in mind, the contents of it
3 are true to the best of your knowledge and
4 belief?
5 **A.** Yes.
6 **Q.** Okay. We'll attend to the signature of the
7 witness statement outside the hearing room, if
8 you say the contents are true to the best of
9 your knowledge and belief?
10 **A.** Yes, they are.
11 **Q.** Thank you very much. I think you understand the
12 questions today are focusing on Phase 4 of the
13 Inquiry, the investigation and prosecution of
14 subpostmasters for criminal offences?
15 **A.** Yes.
16 **Q.** In particular, three case studies, Seema Misra,
17 Allison Henderson and Khayyam Ishaq.
18 **A.** Yes.
19 **Q.** We addressed your professional background and
20 your career on the last occasion that you gave
21 evidence, 12 October this year, and I'm not
22 going to ask you about it again. However,
23 I have got one question about your employment
24 status with the Post Office. If I can just ask
25 you about that, please.

3

1 **Q.** On page 27?
2 **A.** 27 of 35?
3 **Q.** Yes.
4 **A.** Yes, it's just got "GRO" over where I would
5 sign.
6 **Q.** Okay, do you remember making a witness statement
7 and signing it?
8 **A.** I think I was told not to sign it.
9 **Q.** Slightly odd.
10 **A.** I know, on the first occasion, I did sign the
11 first statement but, on the second occasion, my
12 instructing lawyers said, "Don't sign it, you'll
13 sign it there", I think, was -- but I'm very
14 happy to sign it.
15 **Q.** The witness statement that's in front of you,
16 have you read the contents of it?
17 **A.** Yes.
18 **Q.** Are the contents of it true to the best of your
19 knowledge and belief?
20 **A.** Yes. There's one word wrong, in one of -- I've
21 forgotten the number, but there's one word wrong
22 where I've put "audit" instead of "office",
23 I think.
24 **Q.** Can you remember which paragraph, by chance?
25 **A.** I'll look it up at lunchtime, if that's okay for

2

1 **A.** Yes.
2 **Q.** Can we have on the screen, please, POL00128970.
3 To give you some context, this is a document
4 compiled in 2020 during the course of appeals to
5 the Court of Appeal Criminal Division.
6 **A.** Yes.
7 **Q.** We understand that it was prepared before the
8 Court of Appeal Criminal Division gave its
9 judgment and that it was prepared by Peters &
10 Peters, who were the solicitors acting on behalf
11 of the Post Office. In summary, it's inviting
12 the Post Office to essentially report lawyers,
13 including you, to the Solicitors Regulation
14 Authority?
15 **A.** Yes.
16 **Q.** You can see that in the first paragraph, it
17 says:
18 "Counsel has advised that the conduct of
19 Jarnail Singh, Rob Wilson and Juliet McFarlane,
20 three senior lawyers in the [Post Office/Royal
21 Mail Group's] Criminal Law Team between 1999 and
22 2013 (collectively 'the Three Lawyers') is
23 capable of amounting to a serious breach of the
24 [Solicitors Regulation Authority's] regulatory
25 arrangements, having regard to the nature and

4

1 number of cases referred for appeal and the
2 issues identified through a review of material
3 in the [Post-Conviction Disclosure Exercise] and
4 Project Brisbane."

5 We can just see, if we turn to page 3,
6 please, and look at the second paragraph,
7 a summary of what was being said:

8 "Counsel has advised that material
9 identified in the course of [those two exercises
10 I've just mentioned] identifies potential
11 misconduct (whether by individual instance or
12 cumulatively) is capable of amounting to
13 a serious breach. In particular:

14 a. Inadequate investigation, including
15 a failure to pursue all reasonable lines of
16 inquiry whether they pointed towards or away
17 from the guilt of the defendant and to establish
18 that an actual financial loss had occurred in
19 theft cases;

20 "b. Material non-disclosure, in particular
21 about the reliability of Horizon, in breach of
22 CPIA duties;

23 "c. Inadequate, negligent or improper
24 decision making in relation to charging offences
25 and determining whether to drop charges or

5

1 "vi. Making the acceptance of pleas
2 conditional on the defendant not making any
3 explicit criticism of the Horizon system."

4 So they were the issues that have been
5 identified in a potential report to the SRA. If
6 we just go back to page 2, please, and we're
7 going to explore some of those things today. If
8 we look at page 2, and if we look at the bottom
9 part of the document under "Other relevant
10 issues" -- the lawyers have raised above that,
11 I should say, the pros and cons the benefits and
12 the risks of making a report to the SRA, the
13 pluses and the minuses.

14 Then under "Other relevant issues", it says,
15 under paragraph 2:

16 "However, only one of the Three Lawyers ..."

17 You remember that was a defined phrase at
18 the beginning of the document --

19 **A.** Yes.

20 **Q.** -- you, Jarnail Singh, and Juliet McFarlane:

21 "... was ever employed directly by [Post
22 Office Limited]. He is no longer an employee."

23 Were you employed directly by Post Office
24 Limited?

25 **A.** I think probably when I started in 1986 but then

7

1 accept lesser/partial ones, for example:

2 "i. Misunderstanding or misapplying the
3 Full Code Test;

4 "ii. Misunderstanding or misapplying the
5 burden of proof by requiring defendants to prove
6 they were not responsible for the loss suggested
7 by Horizon rather than by proving that there was
8 a loss and that the [subpostmaster] must have
9 been responsible for it;

10 "iii. Attaching improper weight in decision
11 making to the financial/commercial interests of
12 [the Post Office], particularly in terms of
13 using criminal prosecution as a means of
14 recovering losses and/or bringing charges as
15 a means of pressuring [subpostmasters] to make
16 good losses that they were not necessarily
17 liable for ...

18 "iv. Failure, in false accounting cases, to
19 have any regard to the cause of the underlying
20 shortfall that was being covered up by the SPM;

21 "v. Adding theft charges in circumstances
22 where the elements of the offence were not made
23 out and/or potentially with a view to pressuring
24 defendants to plead guilty to lesser charges (in
25 particular, false accounting);

6

1 I moved in 2012 into Royal Mail Group.

2 **Q.** So do you think, between '86 and 2012, you were
3 employed directly by Post Office Limited?

4 **A.** I think they called themselves Post Office
5 Limited. Having said that, when I first applied
6 to have representation, because I'd received the
7 Section 9 statement, POL couldn't find me on
8 their lists and it took them -- I don't know
9 whether it's three or four days, before
10 eventually deciding that I could have legal
11 advice and I'm not sure whether they ever came
12 back to me and said, "Yes, you were a POL
13 employee". But something like that happened.

14 **Q.** What about Jarnail Singh? Was he, to your
15 knowledge, ever directly employed by Post Office
16 Limited?

17 **A.** Well, he will have been directly employed by
18 them from 2012 onwards and he would have
19 probably -- he'd have been in the same position
20 as I would have been prior to that.

21 **Q.** What about Juliet McFarlane?

22 **A.** Similarly with Juliet McFarlane, she would have
23 been in the same position as I was, until 2012
24 when she moved across into Royal Mail Group.

25 **Q.** So the reference there to only of the Three

8

1 Lawyers being employed directly by Post Office
 2 Limited, out of the three of you, who do you
 3 think that's referring to?
 4 **A.** That's probably Mr Singh, on the basis that he
 5 was continuously employed by them and never by
 6 Royal Mail Group.
 7 **Q.** What accounted for the difference in your
 8 relative employment status or the identity of
 9 your employer?
 10 **A.** As far as I was concerned, it was just
 11 continuous. I didn't significantly look at the
 12 change from Post Office to Royal Mail, other
 13 than I was no longer doing Post Office Limited
 14 prosecution work.
 15 **Q.** So if, from 2000 onwards, you had to describe
 16 the employer of you, Mr Singh and Ms McFarlane,
 17 how would you describe it?
 18 **A.** I always thought of it as Royal Mail. In my
 19 brain, I was -- mainly because most of my work
 20 was Royal Mail and only -- I put in my statement
 21 less than 15 per cent was Post Office Limited
 22 work, and my director, Andrew Wilson, when
 23 I first was promoted, I'm pretty sure he was
 24 Royal Mail.
 25 **Q.** That brings me to my next set of questions.

9

1 their names.
 2 **Q.** What was the link between you in your position
 3 and that company secretary?
 4 **A.** There was no link between me and him or her. My
 5 link was to Andrew Wilson.
 6 **Q.** What was the link between Andrew Wilson and the
 7 company secretary?
 8 **A.** I think a direct link. I think he reported to
 9 the secretary.
 10 **Q.** Did you ever have any direct communications with
 11 the company secretary about criminal
 12 prosecutions?
 13 **A.** No. I remember once getting a telephone call
 14 from him because a lawyer had contacted him, and
 15 I took details of the lawyer's number and I rang
 16 the lawyer and dealt with the problem, and that
 17 was probably the extent that -- the extent of my
 18 contact.
 19 **Q.** How did the Criminal Law Team, with you as its
 20 head, report on its work to the board?
 21 **A.** It would be via Andrew Wilson.
 22 **Q.** How did you report on the work of the Criminal
 23 Law Team to Andrew Wilson?
 24 **A.** Well, each report on a case, we collated at the
 25 end of the month and I sent those reports both

11

1 That can come down, thank you.
 2 Did the different employment status or
 3 employer affect lines of reporting?
 4 **A.** My line of reporting was -- initially when I was
 5 promoted, was to Catherine Churchard, who was
 6 General Counsel.
 7 **Q.** Yes, GC, yes?
 8 **A.** Then, when Andrew Wilson took the team, as he
 9 did five or six years into my employment as
 10 a Criminal Law Team Leader, I had a dotted line
 11 to a lawyer in the Legal Team, and I worked
 12 directly to Andrew Wilson.
 13 **Q.** If you were asked, from 2000 onwards, and if
 14 there's any change in the answer from 2000
 15 until, say, 2012, who at board level was
 16 responsible for the conduct of criminal
 17 prosecutions, what would your answer have been?
 18 **A.** The answer would be the current secretary.
 19 **Q.** So whoever was occupying the role of current
 20 secretary --
 21 **A.** Yeah.
 22 **Q.** -- year on year?
 23 **A.** Yes, and I think there were probably two,
 24 possibly even three, while I was there, and, for
 25 the life of me, at the moment I can't remember

10

1 to Andrew Wilson and to the person that I had
 2 a dotted line to in Legal Services.
 3 **Q.** When you say the reports on each case, was that
 4 whether they had reached a conclusion or not,
 5 or --
 6 **A.** I think it was wider than that. I don't think
 7 it was just final reports; I think it was
 8 current cases that -- I had an office manager
 9 who would add up the current cases that we had,
 10 he would collate the reports that we had on
 11 finalised cases that month and he would add up
 12 the new cases that had come in to the team. So
 13 I think it was a statement that I did once
 14 a month, at the end of the month, and it went to
 15 Andrew Wilson and the dotted line person.
 16 **Q.** Did you understand that that was going to the
 17 board, either from Andrew Wilson and the dotted
 18 line person?
 19 **A.** Probably. Although I'm not 100 per cent sure.
 20 **Q.** Did you ever get anything back from the board by
 21 way of direction or suggestion?
 22 **A.** No.
 23 **Q.** Was there any communication that you can
 24 remember, say between 2000 and 2012, back from
 25 the board about the work of the Criminal Law

12

1 Team?

2 **A.** No.

3 **Q.** Did you ever attend any board meetings?

4 **A.** No.

5 **Q.** Did you ever prepare anything for Andrew Wilson

6 or the dotted line person for their attendance

7 at a board, that you can recall?

8 **A.** I don't think I prepared anything. I may well

9 have been a sounding board in relation to

10 something that he wanted to propose to the board

11 but I didn't prepare anything myself. He did

12 that.

13 **Q.** What was the purpose of the preparation of the

14 monthly reports on current cases and cases

15 concluded?

16 **A.** It was to show them the overall picture of what

17 we were doing, in terms of both results, so

18 whether we were successful, and in terms of the

19 numbers that we were processing.

20 **Q.** Did include figures on recoveries by way of

21 confiscation?

22 **A.** No, I don't think so.

23 **Q.** Was there any performance measure of the work of

24 the Criminal Law Team?

25 **A.** No.

13

1 prosecutions.

2 Were you aware of the scope of the

3 contractual responsibility of Fujitsu to support

4 litigation against subpostmasters?

5 **A.** No.

6 **Q.** Did you ever see the contract between the Post

7 Office and Fujitsu to see what the latter,

8 Fujitsu, had promised to the Post Office by way

9 of support in criminal prosecutions?

10 **A.** No, I didn't.

11 **Q.** Can you recall it ever being mentioned,

12 ie "There's a contract that regulates the

13 support that our supplier must give us in

14 criminal prosecutions"?

15 **A.** Yes, I can recall that, yes.

16 **Q.** Given that you can recall that, as the Head of

17 the Criminal Law Team, is there a reason you

18 didn't see the contractual arrangements that

19 actually mapped that out?

20 **A.** Probably, because it was dealt with before

21 I became the Head of the Criminal Law Team and,

22 afterwards, I didn't -- I never asked to see it.

23 I mean, I heard, from time to time, that there

24 were problems in relation to obtaining ARQ data,

25 and I have seen, from some of the documents that

15

1 **Q.** Were there any key performance indicators for

2 the work of the Criminal Law Team?

3 **A.** KPIs ring a bell. I probably had some, as part

4 of my responsibilities, but I can't remember

5 what they were.

6 **Q.** Was the outcome of criminal proceedings linked

7 in any way to the remuneration of any members of

8 the Criminal Law Team?

9 **A.** No.

10 **Q.** Were there any bonuses paid?

11 **A.** Yes.

12 **Q.** What were they paid for?

13 **A.** They were paid for -- largely, I think it was

14 the performance of the business and I think, if

15 you got a good grade in your appraisal, then you

16 might have got some sort of enhancement.

17 **Q.** But they were not linked to the percentage of

18 successful prosecutions --

19 **A.** No.

20 **Q.** -- or the like? Thank you.

21 Can we move on to the next topic, please,

22 which is obtaining evidence in support of

23 prosecutions and, to start with, the contractual

24 arrangements and the approach by Post Office to

25 Fujitsu for obtaining evidence in criminal

14

1 have been supplied to me, some references to

2 Mr Jenkins running out of time and not being

3 able to do any extra work. I saw those sort

4 of -- I must have seen those sorts of things but

5 I didn't have any involvement with the contract

6 at all.

7 **Q.** What's your view, if you hold one, as

8 a prosecutor, about the wisdom of a prosecutor

9 entering into a contract that regulates the

10 extent to which a third party must supply

11 evidence and cooperate in the provision of

12 evidence to a prosecutor?

13 **A.** Well, my view is that it's not a good idea.

14 **Q.** Could you explain why, please, Mr Wilson?

15 **A.** Well, I think that -- I never was particularly

16 interested in what a case was going to cost and

17 I was never particularly interested in anyone

18 trying to truncate the work that we were

19 required to do, particularly in disclosure.

20 I remember seeing an email which I'd forgotten

21 about amongst the papers here, from I think it

22 was a Mark Dinsdale, who was complaining about

23 the amount of data that he was having to supply

24 because he had a new team.

25 **Q.** We're going to come to that a little later.

16

1 **A.** Okay. So I think my view was, if you want to
 2 prosecute these cases, you have to pay for them,
 3 and, if you want to do it properly, we have to
 4 have access to all the information that we
 5 require.

6 **Q.** Did you have any understanding of who had been
 7 involved in the agreement of the contract
 8 between Post Office and Fujitsu that did
 9 regulate the nature and extent of the evidence
 10 that they were obliged to supply?

11 **A.** My understanding now comes from listening to
 12 Teresa -- I think it was Williamson -- I knew
 13 her as Teresa Berridge --

14 **Q.** Yes.

15 **A.** -- who said that she had prepared an open-ended
 16 part of the contract because she was conscious
 17 that the people dealing with the contract --
 18 I believe this is what she was saying -- were
 19 not appreciating that we were doing this from
 20 a criminal point of view and it wasn't simply
 21 a contractual issue. And I think she did --
 22 said that she did that in 2000 and I wouldn't
 23 have been around in the team at that time.

24 **Q.** During your time in your role as Head of
 25 Criminal Law, were you ever involved in or aware

17

1 understanding of Fujitsu's obligations under the
 2 contract?

3 **A.** I know, again from what I've read in the papers
 4 you've supplied me with, that, at some stage,
 5 there was difficulty over our expert meeting
 6 another expert and Jarnail Singh must have come
 7 to me and said, "Look, Rob, what can we do?" and
 8 I emailed and said, basically, "If we can't have
 9 this, we will need somebody in court in
 10 [whatever timespan it was] to explain from
 11 Fujitsu why we can't deal with this".

12 **Q.** So, on an individual case basis, you can
 13 remember becoming involved but nothing more
 14 strategic or higher level: "Look, Security Team,
 15 this what the contract says. This is how we're
 16 going to carry it into effect. This is how it
 17 works"?

18 **A.** I remember when the Court of Appeal made their
 19 decision -- which I have to say that I was
 20 mortified at and felt ashamed, and I couldn't
 21 begin to understand how the subpostmistresses
 22 and subpostmasters must have felt, together with
 23 their families, having -- and for which
 24 I clearly apologise for, profusely. I remember
 25 discussing with Dave Posnett the judgment and he

19

1 of any discussions with Fujitsu over the scope
 2 of the requirements under the contract?

3 **A.** I was aware that there were problems but
 4 I wasn't aware about discussions going on. It's
 5 not something that my role touched.

6 **Q.** But you and your team were the people that were
 7 advising on evidential sufficiency, were laying
 8 a case before a criminal court as fit to be
 9 heard by the criminal court and then prosecuting
 10 it, often to conviction. Does that not mean
 11 that it was part of your role to get involved
 12 with a key supplier of evidence and a contract
 13 that regulated the extent to which they supplied
 14 such evidence?

15 **A.** I never had the impression when we were
 16 prosecuting that we were not getting what we
 17 wanted in terms of ARQ data. Yes, I heard that
 18 there were -- there was, for want of a better
 19 word, whingeing about the amount that was being
 20 required, particularly on Seema Misra, which no
 21 doubt we will discuss shortly. But I never had
 22 a worry in my head that we weren't getting what
 23 we should be getting.

24 **Q.** Thank you. Did you ever become involved in
 25 assisting the Post Office Security Team in their

18

1 said -- and part of the discussion was about
 2 backdoors into the system, and he said that he
 3 was at a meeting with me when I'd challenged
 4 Fujitsu and said "Are there any backdoors to the
 5 system?" and they'd categorically said no.

6 I don't know -- but that's what the
 7 discussion was about but I don't know what the
 8 meeting was about. I didn't actually recall
 9 that, he reminded me of it. So I was at
 10 a meeting with Fujitsu with Dave Posnett but
 11 I can't remember what the substance of the
 12 meeting was. It might have been what you're
 13 alluding to but I don't remember that.

14 **Q.** Can you recall whether that was case specific --
 15 **A.** All I can --

16 **Q.** -- ie the issue had arisen in the context of
 17 an individual case?

18 **A.** It could have been. I honestly don't know.
 19 I hadn't -- I didn't recall the meeting and
 20 I didn't recall asking them the question. Dave
 21 Posnett said to me "I was at that meeting with
 22 you; you asked the question".

23 **Q.** What was your understanding as to the nature and
 24 type of data that might be drawn from Horizon in
 25 order to found the basis for an investigation

20

1 and/or a criminal prosecution?

2 **A.** Well, they had ARQ data, transaction logs,
3 various other logs and information, which
4 I can't really recall now. I've seen some of
5 the matters listed in the papers. But, as far
6 as I was aware, from that data, we should have
7 been able to prosecute each case.

8 **Q.** Had you heard of the expression "Credence data"
9 or data obtained from Credence?

10 **A.** I probably did but I can't recall what it is
11 now.

12 **Q.** You've referred a number of times to ARQ data.

13 **A.** Yes.

14 **Q.** Did you understand that there was a difference
15 between the nature and species of ARQ data that
16 could be obtained, perhaps by reference to words
17 such as "standard" or "enhanced" ARQ data?

18 **A.** Again, I've seen those in the papers. I thought
19 ARQ data, looking back, was data which
20 effectively you could see who was detailing each
21 individual transaction that had taken place.
22 I may have got that wrong. But I thought that's
23 what ARQ data was. I can't remember whether
24 I knew about enhanced data or the standard data.
25 I probably did but I honestly can't remember.

1 review for the purposes of advising whether the
2 evidence met the Code for Crown Prosecutors'
3 standard, which documents concerning the Horizon
4 system would you expect habitually to review?

5 **A.** I would expect to see transaction logs, the
6 audit report.

7 **Q.** So the audit report, meaning the auditors that
8 attended the branch --

9 **A.** Yes.

10 **Q.** -- and conducted a shortfall analysis?

11 **A.** Yes.

12 **Q.** Yes.

13 **A.** Transaction logs, audit report.

14 **Q.** Yes?

15 **A.** I don't think we ever got ARQ data at an early
16 stage. I think ARQ data was sought once we knew
17 that we were going to be involved in either
18 a not guilty or disclosure had been requested.

19 **Q.** Why was that?

20 **A.** Sorry?

21 **Q.** Why was that?

22 **A.** It just -- the way the investigators prepared
23 their papers for us, just generated not every
24 document a limited number of documents together
25 with the interview, obviously, and, from that,

1 **Q.** Irrespective of the distinction, was it your
2 understanding that the data that you were
3 getting by way of ARQ data was data which was
4 capable of showing whether a transaction was
5 initiated and completed by a subpostmaster, on
6 the one hand, or was a system generated
7 transaction, on the other?

8 **A.** I thought it was created by the subpostmaster
9 and, therefore, was quite important, to see what
10 he'd been doing.

11 **Q.** It's probably my question that's at fault. Did
12 you understand from the ARQ data that you were
13 getting that that data would be able to
14 distinguish between whether a transaction was
15 carried out by a subpostmaster, on the one hand,
16 or by the system, on the other?

17 **A.** I understood it to be the postmaster. Have
18 I misunderstood your question?

19 **Q.** Yes. Did you understand that all transactions
20 were subpostmaster initiated and completed?

21 **A.** Yes.

22 **Q.** You didn't understand that some transactions
23 could be created by the system itself?

24 **A.** I didn't understand that, no.

25 **Q.** Okay. When you were conducting your evidential

1 we made the decision. We didn't -- I can't ever
2 remember going for ARQ data prior to actually
3 having a decision being made whether to
4 prosecute or not.

5 **Q.** On the last occasion, I asked you:
6 "Would you expect it to be a necessary
7 element of an investigation to establish the
8 reliability of the data on which
9 an investigation and then a prosecution was
10 founded?"

11 You said, "Yes".

12 **A.** Yes.

13 **Q.** I asked:
14 "Why would you think that was necessary,
15 that it was an ordinary part of the
16 investigation?"

17 You said:
18 "Well, because if they couldn't establish
19 that the system was working properly, the
20 evidence had no value."

21 I asked:
22 "So the reliability of the data was
23 a fundamental or an essential part of any
24 investigation founded upon such data?"

25 You said, "Absolutely".

1 Given those three answers, why wasn't ARQ
2 data routinely part of the investigation and the
3 evidence that was submitted for the purposes of
4 deciding on charge?

5 **A.** Because it wasn't sought by the investigator at
6 that stage.

7 **Q.** That's not really a complete answer, I think
8 you'll recognise, won't you, Mr Wilson?

9 **A.** I'm trying to think, to reconcile what you're
10 saying to me and to actually think back to what
11 actually happened then, and I'm having
12 difficulty.

13 I think, in an ideal world we should have
14 got ARQ data right at the beginning and I may
15 have convinced myself that that's what we did
16 do. But, thinking about it from your first
17 question, I can't remember ever seeing ARQ data
18 straight away. I may be wrong.

19 **Q.** You said in part of the answer that you gave
20 that you would, I think, essentially, wait to
21 see whether it was a guilty or not guilty plea?

22 **A.** Mm.

23 **Q.** If, as you said last time, that it was
24 an essential element of a prosecution case --

25 **A.** Yes.

25

1 stolen money, we wouldn't have been chasing ARQ
2 data. So, yes, I think you're probably right.

3 **Q.** Can we look, please, at FUJ00000071. This is
4 one of the contracts between the Post Office and
5 Fujitsu and, if we scroll down, we can see this
6 the codified agreement, thank you, which
7 regulates a high number of issues between the
8 Post Office and Fujitsu. Can we just look at
9 page 97, please.

10 Scroll down, please, to 4.1.9. Thank you.
11 If we just scroll up a little bit, so we can see
12 the context. Thank you.

13 Can you see two requirements here under the
14 heading "Prosecution support", 4.1.8 and 4.1.9.
15 Under 4.1.8:

16 "The contractor shall ensure that all
17 relevant information produced by the [Post
18 Office Counters Limited] Service Infrastructure
19 at the request of [Post Office Counters Limited]
20 shall be evidentially admissible and capable of
21 certification in accordance with the Police and
22 Criminal Evidence Act 1984 [and equivalent
23 legislation in Northern Ireland and Scotland]."

24 At 4.1.9:

25 "At the direction of [Post Office Counters

27

1 **Q.** -- to prove the reliability of the data, why
2 would it only be obtained after plea had been
3 ascertained?

4 **A.** I think -- I mean, it may be down to cost.
5 I can't remember ever thinking it's a financial
6 consideration. I can't remember that. My view
7 was it didn't matter how much it cost, you know,
8 get on with it, but I don't know. Maybe that's
9 why Investigators didn't go for it in the first
10 place.

11 Alternatively, I think from the papers, some
12 Investigators had to slow their cases down
13 because they couldn't get hold of ARQ data and
14 maybe that was a factor.

15 **Q.** I think you're there talking about cases where
16 an accused person or a suspect in interview had
17 raised an issue about the reliability of Horizon
18 and, as a consequence of that, enquiries were
19 made about obtaining ARQ data.

20 Was it the case that the system was that the
21 Post Office waited until a suspect or an accused
22 person raised an issue about the reliability of
23 Horizon before undertaking this enquiry?

24 **A.** Yes, I think you're probably right. I think, if
25 somebody had unequivocally admitted that they'd

26

1 Limited], audit trail and other information
2 necessary to support live investigations and
3 prosecutions shall be retained for the duration
4 of the investigation and prosecution
5 irrespective of the normal retention period of
6 that information."

7 This is, I think, amongst the contractual
8 material that you didn't see at the time; is
9 that right?

10 **A.** I don't think I've ever seen this document
11 before. I don't even think it's with my papers.

12 **Q.** I think it is but let's just --

13 **A.** I'm not being critical.

14 **Q.** No, okay. Let's just proceed on the basis that
15 it's just these two paragraphs I'm asking you to
16 look at, Mr Wilson.

17 **A.** Right.

18 **Q.** The first requirement under 4.1.8, did you know
19 that, initially at least, there was
20 a contractual requirement placed on Fujitsu to
21 ensure that evidence shall be evidentially
22 admissible and capable of certification in
23 accordance with the Police and Criminal Evidence
24 Act?

25 **A.** I didn't know there was a clause like that, no.

28

1 Q. Does it follow that, when there was an amendment
2 to this contract, after the repeal of the
3 relevant provision in Section 69 of the Police
4 and Criminal Evidence Act, you weren't aware of
5 that change?

6 A. No, I wasn't aware.

7 Q. Was there any change in practice in the Criminal
8 Law Team, as between the period before
9 certification under Section 69 of PACE was
10 required and after the repeal of Section 69 of
11 PACE?

12 A. I assume that the standard clause that went in
13 the witness statement, towards the end of the
14 witness statement, was omitted after the change
15 but that's the only thing I can think of.

16 Q. Were you or others in the Criminal Law Team, to
17 your knowledge, involved in the provision of
18 advice as to what happens now after Section 69
19 is repealed? What are the evidential
20 requirements on computer-based evidence in
21 a criminal prosecution in the courts of England
22 and Wales?

23 A. Well, if I was in charge -- and I know we've
24 been down this street before -- I would have
25 sought counsel's advice and it would have been

29

1 needed to.

2 Q. Or, indeed, the other way round: that lots of
3 witness statements continued to contain the
4 Section 69 --

5 A. Well, yes --

6 Q. -- formulation, even though they were not
7 required?

8 A. Yes, that's a real possibility.

9 Q. Do you consider that you and others in the
10 Criminal Law Team had an adequate understanding
11 at the time of the technical operation of
12 Horizon?

13 A. Looking back now, I don't think we did, no.

14 Q. What about an adequate understanding of the Post
15 Office's estate systems and processes --

16 A. Probably --

17 Q. -- including -- I'm sorry?

18 A. I was just going to say: probably not as well.

19 Looking back, I don't think we involved
20 ourselves on the technical side enough.

21 Q. Including, for example, the operation of
22 transaction corrections?

23 A. I'm not sure what a transaction correction is.

24 Q. Maybe that proves the point.

25 A. Right.

31

1 the counsel that I referred to before, which
2 I erroneously included in my first bundle. But
3 I think that that change was in about 1997.

4 Q. I think the repeal was in '99 and came into
5 effect in about 2000?

6 A. Right, okay. So I wouldn't have been around in
7 the team at that time then.

8 Q. After you became involved in the team, can you
9 recall any standing advice, any instruction or
10 guidance, as to what was required to adduce
11 evidence that was computer based in a criminal
12 prosecution in England and Wales, because what
13 happened was the statutory provision was
14 repealed and the common law sprang up?

15 A. Yes.

16 Q. Was there any guidance on what does the common
17 law now require?

18 A. If there wasn't a general guidance from counsel,
19 which I would have put my money on, then I think
20 counsel, on a case-by-case basis, would have
21 advised us "This doesn't comply" or "You need to
22 do this", but I can't remember that happening.
23 I can't remember seeing an Advice from counsel
24 where they were critical of a witness statement
25 because it didn't follow the format that it

30

1 Q. Wasn't such an understanding necessary of the
2 operation of Horizon and the way the Post
3 Office's estate systems and its processes
4 worked, in order to be able to apply a critical
5 eye to the evidence that an Investigator was
6 sending you to advise on charge?

7 A. I mean, that's very logical now. At the time,
8 I think it was generally assumed that what the
9 Investigator was getting was appropriate and
10 sufficient for the purposes we required it. But
11 I agree with you that we did not know enough
12 about the Fujitsu data and the POL information,
13 with hindsight, yeah.

14 Q. Thank you. That document can come down.

15 Was there any written guidance or policy or
16 procedure on the obtaining of expert evidence
17 for the purposes of a criminal investigation or
18 prosecution?

19 A. No.

20 Q. Why was that?

21 A. Um ... I think -- I think it was -- yeah. I'm
22 having -- I think it was probably because we'd
23 never dealt with an expert witness before and
24 didn't perceive it, because of that lack of
25 knowledge, to be different in the way that you

32

1 cross-examined me in the first day, I think that
2 was the reason, that it didn't strike me at the
3 time that -- through lack of understanding, that
4 the expert was to be treated in a completely
5 different way.

6 **Q.** Can we look, please, at POL00097100. Can we
7 look, please, at page 9 to start with. This is
8 an email chain that you're not copied into,
9 I should stress, but I want to ask you some
10 questions about some of what it says. It is all
11 about Mr Jenkins, Gareth Jenkins, and the
12 treatment of him.

13 If we just look at the emails before the
14 relevant ones, to give you a bit of context, you
15 can see here an email from Sharron Jennings,
16 a Security Manager, to a range of people, some
17 inside Fujitsu, some inside the Post Office,
18 about the case of Patel:

19 "The case due for trial on Monday at
20 Peterborough Crown Court has been put back to
21 14 January 2013 and is listed for a 7 day trial.
22 [Diary, please]."

23 Then if we scroll up, please. Mr Jenkins
24 said:

25 "Sorry, I'm not aware of this case or what
33

1 happening."

2 Then some other details.

3 You'll see there that Sharron Jennings
4 referred to Mr Jenkins as having produced
5 an expert report --

6 **A.** Yes.

7 **Q.** -- and Mr Jenkins himself refers to whether he
8 needs to be an expert witness in a particular
9 case.

10 **A.** Yes.

11 **Q.** In your time as the Head of Criminal Law, did
12 you understand that as his status, namely as
13 a person who gave expert evidence?

14 **A.** Yes.

15 **Q.** From where did you gain that understanding?

16 **A.** From the nature of his work and evidence.

17 **Q.** What do you mean by that, please?

18 **A.** Well, because he, I think, put together a lot of
19 the Fujitsu, I guess, software, and was regarded
20 as an expert by his team, from documents again
21 that you've supplied to me, to the point where
22 he had a support person, Penny Thomas, I think
23 her name was. So I viewed him as an expert in
24 the system, and the person who probably knew
25 more about the system than anybody else on the

35

1 might be required of me ...

2 "I'm not aware of any outstanding cases
3 which I might be involved in."

4 Then scroll up.

5 "Hi Gareth

6 "This is the one that you supplied the
7 expert report and witness statement for the week
8 before last. Apologies for not explaining that
9 properly in the previous email, it was a blanket
10 email for all witnesses! It is unclear at this
11 stage who will be required as witnesses and
12 which evidence will be accepted without the need
13 for attendance. I just thought if I let
14 everyone know", et cetera.

15 Then if we scroll up, please. We can see
16 Mr Jenkins' reply:

17 "Thanks for the clarification. I had not
18 understood that that related to a specific case,
19 I thought that was a general statement. If I am
20 required to go to court for that, I think I need
21 to have some more background on the specific
22 case and exactly what is being alleged.
23 I appreciate that it is not covered by my
24 statement, but if I need to be an expert
25 witness, I need to understand what is

34

1 planet. So that was my belief.

2 **Q.** Can we distinguish three things, please?

3 **A.** Yes.

4 **Q.** One, a person with expertise in an issue or
5 discipline --

6 **A.** Mm.

7 **Q.** -- secondly, a person who gives expert evidence
8 as an expert witness in a court --

9 **A.** Mm-hm.

10 **Q.** -- and, thirdly, a person who is instructed by
11 a solicitor or an Investigator formally to give
12 expert evidence by way of written instruction.

13 Looking at the third category that I just
14 erected there, were you aware of Mr Jenkins ever
15 being formally instructed in that way?

16 **A.** No.

17 **Q.** Out of the remaining two, how did you view
18 Mr Jenkins, ie as a person with expertise in
19 an issue or discipline, who happened to be
20 giving evidence in court, or, formally, as
21 an expert witness in court?

22 **A.** Your first scenario.

23 **Q.** So he was a person simply with expertise in
24 a system?

25 **A.** Yes.

36

1 **Q.** Just for the moment, just by way of short
 2 excursion, in paragraph 15.1 of your witness
 3 statement -- I wonder whether we could turn it
 4 up, please, it's on page 12 -- you say:
 5 "I do not know how Penny Thomas and Gareth
 6 Jenkins came to be involved in these proceedings
 7 against Seema Misra. I believe that Gareth
 8 Jenkins was identified as an expert on the
 9 Horizon system at the inception of the computer
 10 system and had agreed to assist the Post Office
 11 in relation to its role when conducting private
 12 prosecutions. This was probably in 1999, prior
 13 to myself becoming Head of the Criminal Law
 14 Team."

15 Just stopping there. We have documentary
 16 material, Mr Wilson, that suggests that
 17 Mr Jenkins first provided, to use a neutral
 18 word, assistance in prosecution in 2005, in the
 19 case of the *Post Office v Teja*. From where did
 20 you get your understanding that he had a role,
 21 probably in 1999, prior to you becoming Head of
 22 the Criminal Law Team.

23 **A.** I just think it was from looking back, that
 24 I assumed he'd been on board right from the
 25 beginning. I can't point to any documents or

37

1 "There appears to have been some sort of
 2 confusion regarding the trail of emails below.
 3 Gareth was asked to supply an expert report on
 4 Horizon integrity by the Legal Team and I was
 5 asked to input this onto a Section 9 witness
 6 statement in order to produce it in court.
 7 Gareth was not aware that this related to
 8 a specific case and was also not aware that he
 9 would be required in court. [Gareth] is happy
 10 to attend but as explained below it is over and
 11 above the usual [Business As Usual] arrangements
 12 that we have with Fujitsu so some extra
 13 arrangements are required in order to cover
 14 extra costs and time etc. This email is to
 15 request that please."

16 Were you aware of expert reports being
 17 rewritten into witness statements?

18 **A.** I don't think so.

19 **Q.** What would you say about the practice, if you
 20 had been aware of it, ie a person with
 21 expertise, giving opinion evidence, provides
 22 a report or a written document and that's
 23 rewritten by an Investigator or
 24 an Investigations Manager into a Section 9
 25 witness statement?

39

1 anything. It was just what I believed to be the
 2 position.

3 **Q.** So are you extrapolating, essentially, the date
 4 of inception of Horizon --

5 **A.** Yes.

6 **Q.** -- of late '99/early 2000, and thinking he must
 7 have been involved from inception?

8 **A.** Yes.

9 **Q.** As you've said, you haven't identified any
 10 documents that establish such actual
 11 involvement?

12 **A.** No, I haven't.

13 **Q.** Thank you. Can we go back to, after that little
 14 excursion, to POL00097100, and to page 6. This
 15 is the Patel chain of emails, page 6, please.

16 Scroll down, please.

17 You remember that there'd been an exchange,
 18 Jennings and Jenkins, over attendance at a trial
 19 involving Patel, and the trial date being put
 20 back to January 2013. Mr Jenkins saying:

21 "I thought I'd given a generic statement.
 22 If I'm to be an expert witness in this case,
 23 specific to this case, something more will be
 24 required."

25 You will see Ms Jennings says:

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1 **A.** Well, it's odd, and then one or other of the
 2 documents is going to have to be disclosed. So
 3 it's an odd way of going about it.

4 **Q.** Why is it odd?

5 **A.** Well, because he is, effectively, giving two
 6 sets of what might not necessarily be the same
 7 thing. So it's a dangerous practice to
 8 undertake something of that nature.

9 **Q.** Were you aware of what's referred to in the
 10 second part of this email, namely that the
 11 provision of evidence by Gareth Jenkins was
 12 outside usual business as usual arrangements
 13 and, therefore, to provide evidence in this way
 14 required some special arrangements?

15 **A.** Well, that's slightly odd as well because, in
 16 2012, he must have been involved in a number of
 17 our cases. I don't know why they're saying that
 18 it's outside the usual business arrangements
 19 because as I say, he'd been, for want of
 20 a better word, our expert for a number of years.
 21 You're saying from 2005.

22 **Q.** '05.

23 **A.** So it's, again, a strange, strange email.

24 **Q.** If we go up to page 3, please, and then scroll
 25 down, please -- thank you -- we can see that

40

1 Jane Owen -- do you remember her --
 2 **A.** No.
 3 **Q.** -- a Security Manager within Post Office --
 4 emails Mark Dinsdale and says, "Please see
 5 below", and that's essentially the chain. I've
 6 skipped a number of pages but there was some
 7 inconsequential chatter:

8 "Please see below -- in a nutshell Gareth is
 9 required as an expert witness and we have no
 10 money in the pot for him. I remember this
 11 happening before and am sure you dealt with it?
 12 Can you remember?"

13 Then if we scroll up, please. Mr Dinsdale's
 14 reply:

15 "... I raised a request earlier this year
 16 which has not been used, so they could use
 17 a [Post Office] number ... however might be
 18 worth touching base with Andy/Rob if this is
 19 a Horizon Integrity case, because they may want
 20 to challenge why [the Post Office] would pay
 21 Fujitsu to justify the system."

22 Then, if we look, please, further up the
 23 page -- just a little in further -- we can see
 24 that the "Rob" referred to seems to be Rob King,
 25 rather than you, because now copied in are Andy

41

1 **Q.** You moved I think in April of this year?
 2 **A.** Yeah, in 2012, yeah.
 3 **Q.** Would the chain have ended with a discussion
 4 with Jarnail, then -- Jarnail Singh? It
 5 wouldn't have come over to you in your new role?
 6 **A.** No, it wouldn't have come over to me at all.
 7 I had no dealings with POL once we'd transferred
 8 the cases across that they took over. So it
 9 ended in April 2012.

10 **Q.** If we scroll back down, please.

11 Mark Dinsdale says to Jane Owen that the
 12 Post Office might want to challenge "why [the
 13 Post Office] would pay Fujitsu to justify the
 14 system".

15 In your time, did the Post Office see it as
 16 part of Fujitsu's contractual responsibility to
 17 "justify the system", in the words of this
 18 email?

19 **A.** Yes.

20 **Q.** That may be a relatively loaded phrase: "justify
 21 the system".

22 **A.** Yes.

23 **Q.** You're saying that that's how it was seen at the
 24 time?

25 **A.** Well, I think they had to -- yeah, they had to

43

1 Haywood and Rob King. Ms Owen says:

2 "Hi both. Please see Mark's response to the
 3 string of emails below.

4 "... please advise how you wish me to
 5 proceed."

6 Then scroll up to see Mr Hayward's reply:

7 "Need to understand the costs in the first
 8 instance, please. Then suggest we discuss with
 9 Jarnail ..."

10 I think that's Jarnail. Would you
 11 understand that to be a reference to Jarnail
 12 rather than "Jamail"? Maybe it's just the way
 13 its printed:

14 "... Jarnail as he is the legal link in to
 15 the wider Horizon integrity."

16 So looking at that email as a whole --

17 **A.** It is "Jarnail" though. I think there is a gap.

18 **Q.** There's a gap in between, thank you.

19 **A.** Yes. I think there is, yes.

20 **Q.** So that's likely Jarnail Singh?

21 **A.** I think it's almost certainly Jarnail Singh.

22 **Q.** Also the "Rob" referred is to likely Rob King,
 23 rather than you?

24 **A.** It wouldn't be me because I wasn't in POL at
 25 that time.

42

1 give us evidence that the system was working
 2 properly.

3 **Q.** Oughtn't they just to have given evidence as to
 4 how the system was working and whether it was
 5 working properly?

6 **A.** Yes.

7 **Q.** That's a more neutral way of expressing it?

8 **A.** Yes.

9 **Q.** The way that an independent prosecutor would
 10 look at it, with an open mind?

11 **A.** Yeah, I don't disagree with you.

12 **Q.** Was there a mindset or a view that it was for
 13 the Post Office to pay for Fujitsu to justify
 14 its system?

15 **A.** I didn't deal with the finances between Post
 16 Office and Fujitsu. I had no dealings with that
 17 side of things.

18 **Q.** Was it what the Post Office expected when it
 19 instructed Mr Jenkins to give evidence or asked
 20 Mr Jenkins to give evidence, namely to justify
 21 the system?

22 **A.** Well, that would be part of his
 23 responsibilities, I imagine, yes.

24 **Q.** Would that be an appropriate role or instruction
 25 for an expert witness to justify something?

44

1 **A.** Well, I agree with your change of wording, that,
 2 actually, it's not really justifying the system;
 3 it's saying that the system was working properly
 4 at the time that we're concentrating on in
 5 relation to the suspicious activity.

6 **Q.** Thank you. That can come down.
 7 To what extent was the Criminal Law Team
 8 involved, in your time, in editing or tailoring
 9 statements from Fujitsu employees?

10 **A.** Well, I can honestly say that I don't believe
 11 that I ever got involved with editing
 12 statements. I've seen again in the papers
 13 Ms McFarlane, who was suggesting wording on one
 14 of her cases, to -- I believe it was Gareth
 15 Jenkins, it might have been Penny Thomas, I'm
 16 not sure. But I can't ever remember attempting
 17 to change or add to, or whatever, a witness's
 18 statement.

19 My view was that that was the Investigator's
 20 job and my job was to consider what the
 21 statement said and, if I needed anything else,
 22 I would ask the Investigator.

23 **Q.** So let's deal with your personal practice first.

24 **A.** Yes.

25 **Q.** Why wouldn't you, a prosecutor, get involved in

45

1 **Q.** Were you aware of any members of your team, at
 2 the time that you were Head of Criminal Law,
 3 engaging in the process of editing or tailoring
 4 witness statements from Fujitsu?

5 **A.** Well, I've seen the email from Ms McFarlane,
 6 where she is tailoring the witness statement.
 7 I can't remember whether I was copied into that
 8 but, if I was, I think I would have been
 9 mentioning "This is a dangerous practice, you
 10 need to be very careful what you're doing and,
 11 potentially, desist from it".

12 **Q.** Would your answers be any different if the
 13 individual concerned, the person that was making
 14 the witness statement, was giving expert
 15 evidence?

16 **A.** I'd be even more careful because I'm not
 17 an expert.

18 **Q.** In your mind, was there any different approach
 19 that was permissible in liaison with a lay
 20 witness, on the one hand, and an expert witness,
 21 on another, as to a solicitor or barrister,
 22 a lawyer, making suggestions for changes to the
 23 evidence?

24 **A.** Well, I do understand that lawyers do take
 25 statements from potential witnesses but, if

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1 the editing of witness statements or the
 2 suggestion of changes to a witness of their
 3 witness statement?

4 **A.** Because it is almost telling the witness what
 5 you want them to say, as opposed to them giving
 6 you their views on what they're seeing or the
 7 factual position. I wouldn't want to engage
 8 with a witness where I was maybe not forcing
 9 them into a corner but, certainly, giving them
 10 my view as to what I thought they should be
 11 saying. That would have been inappropriate.

12 **Q.** Would you regard it as improper?

13 **A.** Yes.

14 **Q.** Would you include, amongst the risks that are
 15 involved, that you yourself may end up becoming
 16 a witness?

17 **A.** Absolutely. Well, if you're telling somebody
 18 what to do -- I mean, I've seen it in these
 19 papers, in the Henderson papers, where
 20 Mrs Henderson makes comments about what her
 21 lawyers have told her, and I would never want to
 22 be in that position for somebody to turn around
 23 to me and say, "I was told by Mr Wilson I had to
 24 do this". So I wouldn't be involved with that,
 25 no.

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1 you're trying to make somebody change their
 2 statement or change their evidence, presumably
 3 you'd have to have some sort of factual basis or
 4 document that you would be putting to that
 5 witness, in order to get them to change or add
 6 to what they're saying. So I think it would
 7 depend on whether they had some other evidence
 8 in front of them.

9 **Q.** The Inquiry has seen numerous statements from
 10 employees at Fujitsu who have given evidence in
 11 support of Post Office prosecutions over
 12 a period of many, many years, including when you
 13 were the Head of Criminal Law and, in
 14 particular, statements from Andy Dunks, from
 15 Penny Thomas, from Beatrice Lowther and from
 16 William Mitchell.

17 What was the process for obtaining such
 18 witness statements? I'm leaving out of account
 19 Mr Jenkins for the moment.

20 **A.** Well, if we needed a statement to covering
 21 a particular area, the Investigator would be
 22 tasked to obtain it and he, presumably, would
 23 know who to contact for the type of evidence we
 24 were asking for.

25 **Q.** So it was the Investigator's function, is that

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1 right, to obtain the statements from Fujitsu
2 employees?
3 **A.** Yes.
4 **Q.** Was there any special process involved in
5 obtaining statements which addressed technical
6 data outside the expertise of the Investigator?
7 **A.** I think I recall from Dave Posnett's evidence
8 that there was some sort of liaison person
9 involved, who presumably was appointed because
10 they knew more about the Fujitsu expertise and
11 individuals who could provide that expertise and
12 I imagine that the Investigator went via the
13 liaison point.
14 **Q.** Was the Criminal Law Team involved in drafting
15 or amending template statements or boilerplate
16 statements from Fujitsu employees?
17 **A.** Not that I'm aware of, no.
18 **Q.** Were you aware of a template or boilerplate
19 statement from --
20 **A.** I've seen several of them in the papers. At the
21 time, I'm not so sure. I might have been.
22 **Q.** Do you know how they came to be initially
23 drafted?
24 **A.** No.
25 **MR BEER:** Thank you very much.

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1 "The majority of the statement appears to be
2 okay Andy. However, if you can insert 'Further
3 to my previous statement ...' at the top as your
4 other witness statement and call your new item
5 ... APD/03 not APD/02 as APD/02 has already been
6 submitted to the defence. I have spoken to Rob
7 Wilson of our Legal Team who says that this
8 should be okay if we let the defence know what
9 has gone off (the spreadsheet information itself
10 is not a deal-breaker as it were in respect of
11 the case).

12 "... sign and send it on to me ASAP bearing
13 in mind the trial starts two weeks today",
14 et cetera.

15 If we go up to page 1 please and just scroll
16 down a little bit. It looks like that wasn't
17 done immediately in June, because we're into
18 July now. Mr Whitaker says:

19 "See attached statement.

20 "The content of the statement is fine
21 however I have changed the date and added the
22 words 'Further to my previous statement ...' at
23 the beginning to reflect that this is additional
24 evidence to your first statement.

25 "... send it to [my house]."

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1 Sir, it's just coming up to 11.15. I wonder
2 whether that would be an appropriate moment to
3 take the morning break until 11.30.
4 **SIR WYN WILLIAMS:** Yes, of course.
5 Sorry, I've got a frog in my throat. Of
6 course.
7 **MR BEER:** Thank you very much, sir.
8 **(11.14 am)**
9 **(A short break)**
10 **(11.30 am)**
11 **MR BEER:** Good morning, sir, can you continue to see
12 and hear us?
13 **SIR WYN WILLIAMS:** Yes, I can, thank you.
14 **MR BEER:** Mr Wilson, can we turn, please, to
15 POL00156485. I'm continuing to explore the
16 issue of CLT members, Criminal Law Team members'
17 involvement in amending or altering witness
18 statements. Can we turn to page 2, please, and
19 look at the bottom of page 2 and the top of
20 page 3.
21 Can we see here an email exchange of June
22 2011 between Mr Whitaker, the Security Manager
23 within Security Operations in Midlands, and Andy
24 Dunks of Fujitsu, and it's the case of Mackrill.
25 The Investigator says:

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1 Then Mr Dunks replies.

2 If we scroll down to the bottom of page 2,
3 top of page 3, we can see that the Investigator
4 says that he'd spoken to you, who says that this
5 should be okay; can you see that?

6 **A.** Yes.

7 **Q.** Would you be involved in issues like this?

8 **A.** Not normally, I wouldn't have thought. I mean,
9 if an Investigator telephoned me up and said,
10 "Look we've got a problem, will this be okay?",
11 I would try and help him out as much as I could.

12 **Q.** I mean, this looks like it involved the
13 provision of a spreadsheet --

14 **A.** Yes.

15 **Q.** -- shortly before the trial was due to commence.
16 Yes?

17 **A.** Yes.

18 **Q.** This isn't you editing or amending a witness
19 statement. You're giving approval, as is
20 recorded here, to the Investigator's approach,
21 yes?

22 **A.** Yes.

23 **Q.** Would that be how you did things, sort of arm's
24 length, rather than getting involved yourself?

25 **A.** I mean, there may have been occasions when I got

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1 involved with something directly myself but
2 I can't recall them. I think my general view
3 would have been, yes, to have the Investigator
4 as the person who was the buffer between me and
5 the witness.

6 **Q.** Can we turn, please, to POL00017328. Thank you.
7 This is an exchange unrelated to the exchange
8 we've just looked at. It's about the case of
9 McQue. It's an email from one of your lawyers,
10 Juliet McFarlane, to, I think, an Investigator:

11 "Jason

12 "Gareth Jenkins Fujitsu is our expert in the
13 case of McQue due for trial on 28 February.
14 Could you please consider his comments below.

15 "Another potential issue is Commercial
16 cover for my time. At the moment I've run out
17 of the time that the Post Office have committed
18 for me to work on such cases and this needs to
19 be extended before I can do any more. Penny is
20 trying to sort this out with [Post Office], but
21 I thought you should be aware and may be able to
22 influence things'."

23 So this is another exchange, copied to you,
24 this time, concerning Mr Jenkins, referred to as
25 "our expert in the case of McQue", concerning

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1 copying me in to it.

2 **Q.** That was my next line of questions. Why were
3 you becoming involved in this? Why were you
4 brought into it?

5 **A.** I don't know. Juliet McFarlane, when she was
6 promoted to principal lawyer, it wasn't simply
7 a case of her carrying on doing the same sort of
8 work, necessarily, that she'd done before.
9 I gave her the role of heading up the counties
10 cases and she had a meeting, I think, once
11 a month in Old Street with other Post Office
12 Limited lawyers, plus other staff from Post
13 Office, and she would report back to me, as and
14 when, if I needed to know some information. So
15 she sort of headed up, in the team, the POL side
16 of work, and I would have thought that this was
17 something that, within her role, she could have
18 dealt with the other Post Office Limited
19 lawyers.

20 I don't know why she copied it to me. It
21 may be she just wanted me to know about it.

22 **Q.** Did you ever give any guidance of exercise any
23 supervision over the lawyers beneath you in
24 relation to their professional duties concerning
25 expert evidence?

55

1 payment by POL, Post Office, yes?

2 **A.** Yes.

3 **Q.** By this time, January 2011, would you have known
4 that this was a role that he, Mr Jenkins, was
5 performing in multiple cases, many cases on
6 behalf of the Post Office?

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

8 **Q.** By this time, did you know that there were, or
9 continued to be, commercial issues over payment
10 for his time by the Post Office, outside the
11 contract?

12 **A.** Well, from this email, yes.

13 **Q.** This is referring to Mr Jenkins as "our expert"
14 in the case of McQue. What steps, if any, did
15 you take to ascertain how Mr Jenkins had been
16 instructed?

17 **A.** I don't recall taking any steps.

18 **Q.** Can you recall taking any steps to ascertain
19 whether the evidence that he was providing as
20 an expert was properly constituted as expert
21 evidence?

22 **A.** No, I don't think I'd have taken any steps.

23 **Q.** Why would that be?

24 **A.** Well, effectively, I think it was Juliet
25 McFarlane's case and I'm not sure why she's

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1 **A.** No.

2 **Q.** Why was that?

3 **A.** I thought we were doing it properly. I don't
4 think I was alive to the problems that you've
5 pointed out to me.

6 **Q.** When you say "alive to the problems", ie the
7 difference of approach that's needed when you
8 instruct somebody to give expert evidence as
9 a witness in court proceedings?

10 **A.** Exactly.

11 **Q.** Does it follow that that topic, the instruction
12 of expert witnesses, was never something that
13 arose in a continuing professional development
14 context for any of your direct reports?

15 **A.** No, unless they specifically requested to go on
16 a course that directly involved experts.

17 **Q.** Or an audit of the skills that they had or which
18 they needed to have?

19 **A.** No.

20 **Q.** Nor, presumably, in any annual review process
21 for, for example, Ms McFarlane or Mr Singh, that
22 you can recall?

23 **A.** No, I can't recall at all.

24 **Q.** And, presumably, not an issue that arose, to
25 your memory, in any one-to-one reviews?

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1 A. No.

2 Q. Thank you. That can come down.

3 Can I turn to the fourth topic, please,

4 which is bugs, errors and defects, and your

5 knowledge of them. Can we start, please, by

6 looking at POL00070166. Can we look at the

7 bottom of page 1 and on to the top of page 2,

8 please. Can we see here we're in 2006, an email

9 to you from Stephen Dilley. Do you remember

10 Mr Dilley?

11 A. No.

12 Q. A solicitor at an outside firm?

13 A. No.

14 Q. Bond Pearce or Bond Dickinson?

15 A. They will have been civil litigators.

16 Q. Yes. In any event, this is an email from

17 Mr Dilley to you about *Post Office v Castleton*,

18 and he says:

19 "Dear Mr Wilson,

20 "Mandy Talbot may already have spoken to you

21 about this matter. The Post Office is claiming

22 just under 26k from this former subpostmaster

23 for failing to make good unauthorised losses

24 that occurred in January to March 2004 at the

25 Marine Drive branch, Bridlington. The trial

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1 Q. Why would you be informed about a civil case?

2 A. Because I think one of the witnesses on the

3 civil cases we had prosecuted but had to offer

4 no evidence in relation to the prosecution

5 because a large number of pension or allowance

6 orders had disappeared and, from enquiries, the

7 Investigator -- I think it was actually my

8 case -- the Investigator told me that the DWP

9 had removed the pension allowance orders from

10 the file because it was a joint investigation,

11 and were investigating another matter, and they

12 had now been lost and, therefore, we had offered

13 no evidence, I believe, and he wanted me to come

14 to court to give that factual account.

15 Q. Is that what the cross-reference is to the Singh

16 case?

17 A. Yes, I think so.

18 Q. So you're being contacted, not simply because

19 you're Head of Criminal Law but because you have

20 knowledge of this other case?

21 A. I certainly had knowledge of the case, yes.

22 Q. Before this email, which refers to various

23 subpostmasters saying that they have had

24 problems with Horizon, were you aware of any

25 Horizon integrity issues?

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1 starts tomorrow at the Royal Courts of Justice,

2 London and will probably last until the end of

3 next week.

4 "Mr Castleton asserts the losses are

5 entirely fictitious caused by problems with

6 Horizon. He has called various other

7 [subpostmasters] who say they have had computer

8 problems to give evidence."

9 I think that probably means he has called

10 various other subpostmasters to give evidence

11 who say they have had computer problems:

12 "If necessary, would you be able to attend

13 court to give evidence of what happened in the

14 Singh case? I doubt it will be [necessary] but

15 it would be helpful if we could call you if

16 needed.

17 "... we will have a better idea on Thursday

18 how things are going to pan out."

19 Can you help us, looking at that email now,

20 were you being told about this in your capacity

21 as Head of Criminal Law or because you were

22 a potential witness that might need to be

23 called?

24 A. I think I was being contacted because I was Head

25 of the Criminal Law Team.

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1 A. 2006, I don't think I was. In 2006, Mandy

2 Talbot emailed me and, again, I've seen the

3 email in the papers, to ask me had Juliet

4 flagged up any issues with Horizon to me, and

5 I replied, if I can quote it accurately, "No,

6 Juliet hasn't. What do you mean by issues with

7 Horizon?" and I'm not sure I ever got a reply.

8 Certainly, there was no follow-up email on -- in

9 your papers, and I think that was 2006 as well.

10 Q. So this is December 2006, and this would be the

11 first time, then, that you would be aware of

12 subpostmasters alleging problems with Horizon?

13 A. Yes, via this email here.

14 Q. Yes. Did --

15 A. Well, it might not have been. We may have

16 had -- I mean you've mentioned Gareth Jenkins in

17 2005 being called on a case. So I may have been

18 aware of issues then. It wasn't -- we did get

19 defendants saying "We have issues with Horizon".

20 Q. Did you hear about the production of any expert

21 evidence in this case, the *Castleton* case?

22 A. No. I don't think I knew -- I don't think I was

23 given any details on the case. I was simply

24 asked about the case that I may well myself have

25 been prosecuting at the time. I certainly

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1 remember the pension allowance orders being
 2 mentioned to me as being missing. That was
 3 fairly significant. So it may have been my
 4 case.

5 **Q.** Did you ever have sight of any expert report or
 6 draft expert report prepared in the *Castleton*
 7 case?

8 **A.** Not that I'm aware of, no.

9 **Q.** Can we move on, please, to POL00157980. Look
 10 at page 2, please. Thank you.

11 Can we see an email from Mandy Talbot to
 12 a range of individuals there?

13 **A.** Yes.

14 **Q.** You're, I think, the third of them; can you see
 15 that?

16 **A.** Yes.

17 **Q.** Ms Talbot says, again in the case of *Castleton*:
 18 "This is just to let you know we have been
 19 completely successful in defending all the
 20 allegations made by Mr Castleton. You will
 21 recall that he contended that no genuine losses
 22 occurred whilst he was a postmaster and that any
 23 losses were manufactured by the Horizon system.
 24 The judgment has entirely vindicated the Horizon
 25 system."

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1 **Q.** That it could be used when, I don't know,
 2 interviewing a suspect, when talking to
 3 a defendant or a defence solicitor?

4 **A.** Cases are individual. We wouldn't have been
 5 referring to another case to try to persuade
 6 somebody to plead guilty or whatever, in
 7 an entirely different case. No.

8 **Q.** So you wouldn't seek to cross-deploy the outcome
 9 of a case in another case?

10 **A.** No.

11 **Q.** Can you help us to identify the other recipients
 12 of the email: Clare Wardle?

13 **A.** Clare Wardle was a senior person, I believe,
 14 in -- I thought she was Intellectual Property
 15 but she may well have been a Head of the Civil
 16 Litigation Team at that timetable. I'm not
 17 sure.

18 **Q.** Biddy Wyles?

19 **A.** Biddy Wyles, as I understand it, was a civil
 20 litigator.

21 **Q.** In Mandy Talbot's team?

22 **A.** Yes.

23 **Q.** If we go up, please, and a little bit more,
 24 thank you. We can see Rod Ismay's reply, and
 25 you're on this copy list too.

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1 Did you know at this time, late 2006/early
 2 2007, that the case, the *Castleton* case, was
 3 regarded within the Post Office as an important
 4 one?

5 **A.** I don't think I did, no.

6 **Q.** A vehicle to seek to vindicate the reputation of
 7 the Horizon system?

8 **A.** No, it was a civil case. I wouldn't have been
 9 privy to details of the case at all.

10 **Q.** You were on Mandy Talbot's list of people to
 11 give this news to, yes?

12 **A.** Yes, I imagine she sent it to me because I'd
 13 been involved because, as you say, Bond -- was
 14 it Pearce?

15 **Q.** Yes, I can't remember whether they were Bond
 16 Pearce or Bond Dickinson.

17 **A.** Yes -- had wanted me to go and give evidence,
 18 and I said I would. So I assume I was added in
 19 there, plus she probably wanted to tell me that
 20 Horizon had been vindicated.

21 **Q.** Would that because the outcome of the
 22 proceedings might be deployed in criminal
 23 proceedings?

24 **A.** No. How do you mean, deployed in criminal
 25 proceedings?

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1 **A.** Yes.

2 **Q.** Can you see that?

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

4 **Q.** "Thanks Mandy -- great news. And thanks to
 5 everyone in this email and in your teams as
 6 I know you have had to do a lot of work in
 7 supporting the defence case here. Like you, my
 8 team faced a stack of witness interviews and
 9 court attendances at one time so the progress
 10 and conclusion here is great news.

11 "What can we do on a proactive comms front
 12 here? We've watched the various inflammatory
 13 letters in the SubPostmaster letters page, and
 14 wanted to be able to assure branches and clients
 15 that they can rely on the integrity of Horizon.

16 "We've had some good articles in the
 17 SubPostmaster about NBSC, Online Service and
 18 Cash In Transit. I am planning briefs on what
 19 P&BA does.

20 "Any thoughts on comms following this case?"

21 So Mr Ismay has expressed a desire for
 22 proactive communications to make the most of the
 23 judgment, agreed?

24 **A.** Yes.

25 **Q.** The distribution list includes Keith Baines, is

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1 that right, the Head of Commercial?
 2 **A.** I didn't know Keith Baines.
 3 **Q.** David X Smith, the Head of IT?
 4 **A.** I didn't know him either.
 5 **Q.** And other people from security across the
 6 business; can you see that?
 7 **A.** I can see Tony Utting, I recognise his name, and
 8 I think he is -- Graham Ward, I think he was
 9 an Investigator; Doug Evans was actually
 10 a solicitor to the Post Office; and Clare
 11 Wardle, Biddy Wyles and Mandy Talbot are the
 12 only other ones I know.
 13 **Q.** Clare Wardle, general counsel?
 14 **A.** No, Clare Wardle -- Doug Evans was General
 15 Counsel.
 16 **Q.** Sorry, my mistake.
 17 **A.** Clare Wardle, I think, probably headed up Civil
 18 Litigation at that time, although, initially,
 19 she was an intellectual property lawyer.
 20 **Q.** Would you agree that, by this point in time,
 21 early 2007, it was clear to you that the
 22 business, the Post Office business, regarded it
 23 as important to defeat any person that alleged
 24 that Horizon was in any way defective in the
 25 courts?

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1 can see, just if you take a moment, who is
 2 present from both the organisations: three from
 3 Fujitsu, including Mr Jenkins; and the rest from
 4 the Post Office, including Mr Ismay and Andrew
 5 Winn. If we scroll down to the foot of page 1,
 6 please. In the penultimate box, there's
 7 an action to:
 8 "Get advice from the [Post Office] Legal
 9 Team in relation to conversations and
 10 communications to subpostmasters following
 11 software issues that impact upon the branch
 12 accounts."
 13 Can you see that?
 14 **A.** Yes.
 15 **Q.** Just take your time to digest that. So software
 16 issues that impact on branch accounts. At this
 17 time -- so this is August 2008 -- were you aware
 18 of any software issues that impacted upon branch
 19 accounts?
 20 **A.** No, I don't believe I was at all, no.
 21 **Q.** Were you involved subsequently in any
 22 communications to subpostmasters about software
 23 issues that impacted on branch accounts?
 24 **A.** No, I never made any communications to
 25 subpostmasters, of any sort.

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1 **A.** Well, it certainly seems that way from Rod
 2 Ismay's email, yes.
 3 **Q.** Was that a consistent message, in your time as
 4 Head of the Criminal Law Team, that was cascaded
 5 down to you?
 6 **A.** I don't think -- I think these were fairly rare.
 7 I think there were one or two of them around,
 8 but they weren't consistently.
 9 **Q.** Did you yourself cascade this down to any
 10 members of your team?
 11 **A.** Probably not.
 12 **Q.** Why not?
 13 **A.** Well, like I said before, I mean, our cases were
 14 individual cases and so Civil Litigation had won
 15 this case and, clearly, Rod Ismay was delighted
 16 with that, but it doesn't make any difference to
 17 what we were doing and it adds no value, in
 18 a sense, to us because it's not something we
 19 could use.
 20 **Q.** Can we move on to FUJ00155230. We've moved on
 21 from 2006/7 to 2008 now, and this is a Post
 22 Office and Fujitsu joint Product and Branch
 23 Accounting workshop. You're not listed as
 24 present there but I want to pick up something
 25 that's referred to in these action points. You

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1 **Q.** If this sort of action was raised, "Get advice
 2 from Post Office Legal Team", would it come to
 3 you as the Head of Criminal Law to allocate?
 4 **A.** No. I think that's directed towards Civil
 5 Litigation.
 6 **Q.** Why do you think it's directed towards Civil
 7 Litigation?
 8 **A.** Well, I think, first of all, Rod Ismay, as I've
 9 seen from these documents, involved Mandy Talbot
 10 in a lot of work and they both communicated with
 11 one another and, secondly, you were critical of
 12 one of my emails where I've effectively gone
 13 close to losing my temper about being excluded
 14 from a meeting, where I'd said -- the first line
 15 was something like it was imperative that if
 16 there was a problem that it was dealt with.
 17 And I don't think I was involved -- yes,
 18 I wasn't involved on the list of people here and
 19 I wasn't involved with that meeting, until Dave
 20 Posnett interjected and said "We ought to be
 21 telling Rob Wilson these things".
 22 So I don't think I was in any sort of loop
 23 or conversation with anybody particularly senior
 24 and Rod Ismay, as far as I'm aware, the first
 25 contact I had with him was prior to him doing

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1 his report, and I've forgotten the year -- 2010,
 2 I think it was.
 3 **Q.** August 2010 it was concluded, yes.
 4 **A.** So my -- I believe my first contact with him,
 5 because I hadn't come across him before -- and
 6 I did see his YouTube cross-examination by
 7 yourself, and I didn't recognise him at all. So
 8 I don't think that I was in the loop for these
 9 types of communications.
 10 **Q.** Should the Criminal Law Team have been in the
 11 loop, if there were software issues that
 12 impacted upon the branch accounts?
 13 **A.** Absolutely. That's why I lost my temper or
 14 close to losing my temper with the email that
 15 you rightly questioned me about.
 16 **Q.** Why should, on this issue, the Criminal Law Team
 17 have been in the loop?
 18 **A.** Well, because we didn't know that there were
 19 software issues. It's something that we should
 20 have known. I would want to know what they
 21 were.
 22 **Q.** Were you aware of this or similar workshops
 23 taking place?
 24 **A.** I had no idea that this took place, no.
 25 **Q.** To the best of your knowledge, were any of the
 69

1 some handwriting next to the words "Kind
 2 regards, Penny"?
 3 **A.** Yes.
 4 **Q.** It appears to read "Roy Wilson, (Legal)" --
 5 **A.** Yes.
 6 **Q.** -- can you see that -- which I think is probably
 7 a reference to you?
 8 **A.** I'm sure it is.
 9 **Q.** The next series of questions I'm going to ask
 10 you concern the extent to which the information
 11 in these emails was brought to your attention.
 12 So if we look firstly at the bottom half of the
 13 page, please, this is an email chain that
 14 doesn't include you. It's from Wendy Warham
 15 and, if we scroll to the foot of the page,
 16 please, I think it's just over the page, you can
 17 see who she is: an Operations Director within
 18 Fujitsu, as part of the Royal Mail Account, yes?
 19 **A.** Yes.
 20 **Q.** If we just scroll back up, please. She says to
 21 Sue Lowther and David X Gray, so Post Office
 22 employees:
 23 "Sue I have left you a voicemail as I need
 24 to update you on a recent issue that has
 25 occurred and been resolved but does have some
 71

1 Criminal Law Team consulted in relation to
 2 communications to subpostmasters about software
 3 issues impacting upon branch accounts?
 4 **A.** I don't believe anybody was. I'm pretty sure,
 5 if anybody had been contacted, they would have
 6 told me.
 7 **Q.** Would you agree that one of the reasons why the
 8 Criminal Law Team should have been involved, if
 9 it had been identified that there were software
 10 issues that impacted upon the branch accounts,
 11 would be so that the prosecutor could discharge
 12 his or her duties of disclosure in criminal
 13 proceedings --
 14 **A.** Yes.
 15 **Q.** -- so that they could bring such knowledge into
 16 account when considering the evidential
 17 sufficiency in a particular case --
 18 **A.** Yes.
 19 **Q.** -- and when considering the propriety of
 20 continuing prosecutions?
 21 **A.** Yes.
 22 **Q.** Can we move on, please, to 2009, FUJ00155399.
 23 If we scroll down and look at the bottom half of
 24 the page, please -- in fact, if we just look at
 25 the top half first. Do you see that there's
 70

1 short-term impacts. In summary the issue is as
 2 follows:
 3 "In December 2007 an occurrence was reported
 4 in one office where a stock unit rollover
 5 coincided with the end of day process running.
 6 This led to a previously unseen database lock
 7 where an administrative balancing transaction
 8 failed to be written to the local message store
 9 database. This generated a generic and
 10 non-specific software error ... which went
 11 unnoticed in the monitoring of events.
 12 A financial imbalance was evident and was
 13 subject to Fujitsu's Service Support Centre and
 14 Post Office Limited. The financial imbalance
 15 has been resolved.
 16 "A software correction was applied across
 17 the estate in early ... 2008 to ensure that such
 18 event generated would be monitored."
 19 I think that's "such events generated would
 20 be monitored":
 21 "Testing of that correction has established
 22 that the unmonitored error does not occur
 23 elsewhere in the system.
 24 "Impact
 25 "We need to work with the Post Office to
 72

1 recheck the ARQs and reconfirm the data
2 integrity during the period of May '07 to
3 November '08 -- Penny will do this.

4 "We need to discuss how we disclose the
5 issue on the witness statements and we have some
6 words which may be appropriate -- both need to
7 discuss and agree the words.

8 "Identify which witness statement we have
9 supplied and are still awaiting court to confirm
10 whether or not the data provided was May '07 to
11 November '08 to (a) ensure events have been
12 checked and (b) to recall and replace witness
13 statements -- [Post Office]/Penny."

14 Then under "Further Action", second line:
15 "Education to ensure that this type of
16 incident is raised as a Major Incident in the
17 security stack so that we can communicate and
18 manage this in accordance with incident
19 timescales."

20 Going up to the top of the page, you'll see
21 your name written on there, in so many words.
22 Was this incident, security incident,
23 communicated to you orally?

24 **A.** Yes, it could have been.

25 **Q.** If you look at the handwriting on the right-hand

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1 email, does it cause you concern?

2 **A.** It should have done, yes.

3 **Q.** Why should it have caused you concern?

4 **A.** Because there was a bug which had been
5 identified a year before, albeit it was isolated
6 at one office.

7 **Q.** Why is that of concern?

8 **A.** Well, because it was a bug.

9 **Q.** Now, can you recall what advice you gave, if
10 any?

11 **A.** I gave very poor advice.

12 **Q.** What was the poor advice you gave?

13 **A.** I think it was the words to the effect that, if
14 it only impacted one office, then there's
15 probably nothing to disclose.

16 **Q.** I think you're referring to a later email chain
17 on this point, aren't you?

18 **A.** Yes, I am.

19 **Q.** Let's track that email chain down. FUJ00155400.

20 If we look at the bottom of page 2, on to the
21 top of page 3., can we see an email later that
22 day at 3.54 on 7 January from David Posnett to
23 you?

24 **A.** Yes.

25 **Q.** It's about the security incident. If we just

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1 side, we think this is written by Penny Thomas
2 and is referring to two conversations that she
3 had with David Posnett?

4 **A.** Yes.

5 **Q.** The first one on the 7th:

6 "Spoke to [David Posnett] -- he will liaise
7 with his Legal Team and advise requirements and
8 comments for [witness statements]."

9 Then another conversation with David
10 Posnett:

11 "Spoke to DP [later that day]. He had
12 liaised with Legal -- they need the checks for
13 the 400,000 ARQs to be made and results
14 returned. Their brief will need to contact
15 counsel in the event that we find any anomalies.

16 "Discuss witness statement -- will review
17 and talk again at a later date."

18 Putting all of that information together,
19 the content of the email, the handwritten notes
20 on the right-hand side, and your name being
21 written on there, do you think you were
22 contacted, perhaps by David Posnett, about this
23 issue?

24 **A.** Yes.

25 **Q.** Looking at the information contained in the

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1 scroll to the end of the chain. You'll see that
2 he doesn't, in fact, include the email that
3 we've looked at.

4 **A.** Yes.

5 **Q.** If we scroll up, please. Although the subject
6 line is forwarding the "Security Incident",
7 which was the title of the previous email, it's
8 in fact not included here. Let's see what he
9 does tell you:

10 "Rob, in relation to the standard witness
11 statement Fujitsu provide ..."

12 We'll ignore the first one:

13 "2) The following additional paragraphs
14 have been inserted (page 7). I personally do
15 not see the need for these if there are no
16 problems identified with the data relating to
17 the case in question. Why inform anyone about
18 a problem we've had within the network, but
19 possibly only at one branch, if it bears no
20 relation or relevance."

21 Then there's those two paragraphs that we
22 did see from the earlier witness statement --

23 **A.** Yes.

24 **Q.** -- the earlier email, which have been cut in.

25 The beginning of the email starts:

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1 "In relation to the standard witness
2 statement Fujitsu provide ..."
3 Were you aware, by at least 2009, of
4 a standard witness statement?
5 **A.** I imagine I must have been, yes.
6 **Q.** You were being told here that there had been at
7 least one missed or unnoticed or unseen error
8 causing a financial imbalance, which had not
9 initially been picked up by Fujitsu systems
10 intended to pick up such issues, correct?
11 **A.** Yes.
12 **Q.** On reflection, I think, now you would agree that
13 this was a considerable cause for concern?
14 **A.** Yes.
15 **Q.** Would you include within the causes for concern
16 that the issue had been reported in December
17 2007, afflicted data that went back to May 2007
18 and that the fix had not been introduced, it was
19 said, until November 2008 --
20 **A.** Yes.
21 **Q.** -- and that the Post Office were being told
22 about it in January 2009?
23 **A.** Yes.
24 **Q.** Are you aware whether the Post Office undertook
25 any independent testing or required Fujitsu to

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1 system missed the event or is it saying the
2 operatives did not notice the event?
3 **Q.** The line is "This generated a generic and
4 non-specific error event which went unnoticed in
5 the monitoring of events"; that's the line
6 you're referring to?
7 **A.** Yes, so the unnoticed bit, you're saying, is the
8 Fujitsu back-up, as opposed to an operative who
9 is viewing the data.
10 **Q.** You've rightly said that you're not sure if this
11 affects the quality of the decision that was
12 made?
13 **A.** No, the quality of the decision was very poor.
14 **Q.** But, in any event, whether it's a system failing
15 to identify the previously unseen database lock
16 or the system identifying it but a human not
17 taking action, it having been identified, the
18 problem or the concern is the same?
19 **A.** Yeah, the concern is the same, albeit it would
20 be more worrying if the system itself had not --
21 if it was designed to pick up the problem, had
22 not picked up the problem. You can understand
23 human error but, if the system was -- if I'd
24 read it as the system being bad, in my view that
25 would have been worse.

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1 provide the results of any testing of the fix
2 applied in 2008?
3 **A.** Did that not come later, about a week later?
4 **Q.** I don't think we've seen evidence of the success
5 of the fix. I think we've got an email from
6 Fujitsu which said it's all all right. I'm
7 talking about some sort of independent testing
8 or did that kind of thing just not happen?
9 **A.** I don't think POL would have independently
10 tested Fujitsu data, no.
11 **Q.** What about when this happened? We're going to
12 see that it happened more than once where a bug
13 is disclosed and Fujitsu say a fix has been
14 applied and it works. What was the process, to
15 your knowledge, of checking to see whether what
16 the contractor was saying was correct?
17 **A.** I'm not sure POL had any ability to check the
18 Fujitsu system.
19 **Q.** Would you agree that what's disclosed here
20 suggested, fix or not, that other errors might
21 have been missed or, in the words of the email,
22 "unnoticed" or "unseen", ie the safety net
23 that's meant to pick things up was not working?
24 **A.** I don't want to excuse anything because this was
25 a bad decision by me, but is it saying that the

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1 **Q.** So the concern would be greater, in fact?
2 **A.** Yes, the concern would have been greater.
3 **Q.** On this email, you can't tell which?
4 **A.** Not on this. I'm not sure that I recall the
5 discussion I had with Dave Posnett either, so
6 I couldn't say one way or the other.
7 **Q.** If we can scroll, then, to the bottom of page 2,
8 we can see your advice, given just after 4.00
9 the same day. You say, "Thank you for both of
10 your emails". Do you think that the first email
11 that we looked at, the one with your name
12 written in hand on it, was in fact forwarded to
13 you?
14 **A.** Probably. Possibly.
15 **Q.** Because the email that's part of this chain
16 doesn't give you much context, does it --
17 **A.** No.
18 **Q.** -- whereas the longer email from Fujitsu
19 themselves does?
20 **A.** Yes.
21 **Q.** So that might explain the reference to "both of
22 your emails" --
23 **A.** Yes.
24 **Q.** -- the other one and the one that's underneath
25 this chain here.

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1 You say:

2 "So far as the addition is concerned ..."

3 The addition is the two paragraphs under
4 paragraph 2 that aren't in bold, if they can
5 just be highlighted. Thank you, that's the
6 addition, the proposed addition.

7 Let's scroll back up, please.

8 "So far as the addition is concerned my view
9 is that if we are sure that there are no
10 incidents then there is nothing undermining that
11 will need to be flagged up to the defence. The
12 incident will have no relevance to our cases and
13 as such could only lead to fishing expeditions
14 if we added anything into the standard
15 statement.

16 "As soon as we know what the position is
17 I will advise further."

18 You've said candidly today that you regard
19 that advice as poor or very poor. Why is that,
20 Mr Wilson?

21 **A.** Well, it was -- they'd already prepared the
22 witness statements to add in this. I don't know
23 why I didn't decide to just rely on that and
24 then I -- then I compound the mistake by adding
25 that it could only lead to very fishing

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1 a true one-off; do you agree?

2 **A.** Yes.

3 **Q.** But would you agree that, even the existence of
4 a one-off, undetected error may be relevant to
5 undermine any assertion by Fujitsu witnesses
6 and, in turn, the Post Office that the figures
7 produced by the Horizon system were robust and
8 reliable?

9 **A.** Yeah, I agree with you now. At the time,
10 clearly I didn't address that in the proper way.

11 **Q.** Put another way: if you were being prosecuted,
12 would you consider this information undermining
13 of a Post Office case or beneficial to the
14 defence case, based on a lack of integrity in
15 Horizon?

16 **A.** Yes, I probably would.

17 **Q.** The advice is only forward looking, ie "What
18 shall we do in future cases", in the inclusion
19 or exclusion of the two paragraphs in the
20 witness statement; do you agree?

21 **A.** Yes.

22 **Q.** Did you consider whether there was a continuing
23 duty of disclosure in respect of prior
24 convictions based on Horizon data?

25 **A.** I think I looked at it simply from the point of

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1 expeditions, which was a crass thing to say.

2 **Q.** Was this being sent in an environment which
3 explains why you did it, namely that it was
4 important to defend the integrity of Horizon?

5 **A.** No, I've said before, I wasn't in the loop in
6 relation to the people who were being contacted
7 in relation to the civil litigation matters that
8 were going on.

9 **Q.** What explains your poor advice, then?

10 **A.** I'd had a very bad day. I'm not wishing to be
11 facetious but I made completely the wrong
12 decision.

13 **Q.** If we scroll up, please. Mr Posnett
14 communicates that to Fujitsu, to Penny Thomas:
15 "To note emails below.

16 "I would say Business As Usual re the
17 witness statements, ie don't include the two
18 additional paragraphs on the last page.

19 "If any issues materialise in due course, we
20 can address then -- suggest the ARQs for these 4
21 cases are assessed first."

22 The view which you took could only be
23 a legitimate one, on your view of the facts, if
24 the position was absolutely certain that the
25 incident could never happen again, ie it was

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1 view that one office was impacted and,
2 therefore, didn't consider that, no.

3 **Q.** Do you consider, Mr Wilson, with the benefit of
4 hindsight, in respect of this exchange, that, as
5 the serious incident referred to raised
6 questions about the reliability of Horizon data,
7 there was a responsibility on you to ensure that
8 past prosecutions, if relevant, had disclosure
9 made to convicted defendants?

10 **A.** Yes.

11 **Q.** If we just scroll back down to the advice that
12 you did give, you say:

13 "... if we are sure that there are no
14 incidents then there is nothing undermining ...
15 "As soon as we know what the position is
16 I will advise further."

17 Did you consider what the position was
18 further?

19 **A.** As I understand it, there was an email about
20 a week later, which said that they'd conducted
21 the exercise and it was all clear.

22 **Q.** Overall, do you accept that this exchange raised
23 some questions about the integrity of Horizon?

24 **A.** I fully accept what you've said and I fully
25 accept that I made the wrong decision.

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1 Q. Thank you. Can we move on. POL00053723. If we
2 scroll down, please. Thank you.

3 An email from Mr Dinsdale to you of
4 11 December 2009. I think this is the email you
5 were referring to right at the beginning of your
6 evidence --

7 A. Yes, I think it is, yeah.

8 Q. -- when I said we'd come back to it. In the
9 case of Seema Misra -- and we're going to look
10 at that in more detail, I think, probably after
11 lunch -- he says:

12 "Rob, I am looking for a bit of guidance on
13 this request for Jon Longman in respect of Seema
14 Misra -- West Byfleet.

15 "This is a huge piece of work which could
16 potentially wrap my team up for weeks, and then
17 only to be asked for more questions of a similar
18 nature. I also have concerns over the types of
19 questions that are being asked and whether we
20 can actually provide the information (two of the
21 cases are still ongoing).

22 "We are a new team and would really
23 appreciate your guidance on this on how to move
24 this one forward. Are these questions that
25 yourselves need to answer from a legal

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1 accounting as a result of alleged losses on the
2 Horizon system."

3 If we go back to the start of that email,
4 please -- and scroll up, and scroll down, thank
5 you -- would you agree that these proceedings,
6 the Seema Misra proceedings, involved for the
7 Post Office perhaps an unusual disclosure
8 exercise focusing on challenging Horizon
9 integrity.

10 A. Yes.

11 Q. Why were you being contacted?

12 A. I have no idea. Probably because I was simply
13 the head of the team, maybe he didn't know that
14 the case was being dealt with by Jarnail Singh.

15 Q. Or would it be that Mr Singh was absent at this
16 time?

17 A. Possibly. I don't know.

18 Q. If we scroll up, please, we'll see that somehow
19 Mr Singh has got the email.

20 A. I think I sent it to him along with my reply to
21 Mark Dinsdale.

22 Q. He has forwarded it to Warwick Tatford --

23 A. Yes.

24 Q. -- asking for advice on the parameters of
25 disclosure?

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1 perspective. Clearly some of these questions
2 are so unspecified, that we could be dragging up
3 Horizon reports for almost every branch over
4 a ten-year period for every single week in
5 operation."

6 Then if we just scroll down, you can see the
7 questions from the defence request have been cut
8 into the email.

9 Scroll down a little bit further. Then
10 scroll a little further.

11 Under the new number (1) there:

12 "The prosecution has always maintained there
13 is no problem with the Horizon system ... given
14 the impression that the defendant's defence of
15 raising issue with the system has no merit.
16 [We] raise the following cases. Others are in
17 the pipeline."

18 McDonald, Hosi, then over the page:

19 "In light of the information ... please now
20 provide details of:

21 "a) All post offices, past and present,
22 that have experienced losses with the Horizon
23 system.

24 "b) All prosecutions, past and present that
25 have been brought for theft and/or false

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1 A. Yes.

2 Q. Not long after this exchange, December 2009,
3 ie in March 2010, you wrote your long email,
4 which we examined on the last occasion at some
5 length, the one where you said you were
6 exasperated at not being invited to the
7 meeting --

8 A. Yes.

9 Q. -- concerning the proposal for an independent
10 expert examination of the Horizon system. You
11 said in the first line, I'm summarising, "If
12 there is a genuine issue then, of course, it
13 must be investigated", but then suggested
14 a series of consequences if that happened.

15 A. Yes.

16 Q. I'm not going to go back to that email again
17 today but I think you'll agree that your
18 intervention, never mind the motivation for it,
19 had the consequence of stopping the independent
20 investigation proposed?

21 A. Well, after that, Rod Ismay's report was
22 prepared.

23 Q. He wasn't in any sense independent though, was
24 he?

25 A. No, no --

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1 Q. They were talking about, in the exchange,
 2 getting somebody from outside the organisation
 3 involved?
 4 A. Yes, that's probably right.
 5 Q. Was your intervention in the March email
 6 exchange in any way connected with this
 7 disclosure request in the *Misra* case?
 8 A. No.
 9 Q. Did you take the view that it was necessary to
 10 close the proposed independent investigation
 11 down and limit disclosure where ever possible?
 12 A. I never saw myself as closing the
 13 investigation -- independent investigation down.
 14 I mean, Rod Ismay was senior to me and, if
 15 he'd -- he and his boss had wanted an
 16 independent investigation, I wouldn't have
 17 attempted to stop them, if they felt that that
 18 was needed, and it seems as though Rod Ismay was
 19 in a greater position to understand what was
 20 going on than I was.
 21 So I didn't see myself as closing that down
 22 at all but I can understand why you interpreted
 23 it that way.
 24 Q. Was there any connection between this
 25 significant request for disclosure that went to

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1 not consider these issues to be disclosable
 2 material in the prosecution. I understood that
 3 the Seema Misra case was prosecuted under the
 4 Horizon system implemented from 1999. The
 5 issues raised here I believe related to the new
 6 Horizon system which was installed from January
 7 to September 2010 and did not have any relevance
 8 to the initial system which had now been
 9 reimplemented as New Horizon (HNG-X). I now
 10 believe that this was the wrong decision and
 11 that I should have disclosed this issue in
 12 relation to all existing prosecutions."
 13 So I want to explore, if I can, your
 14 awareness of two sets of issues there. One is
 15 the receipts and payments mismatch bug, that's
 16 the two documents that end in 410 and 838, and
 17 then, separately, the duplicated records issue,
 18 which is the document that ends in 995.
 19 Can we explore, please, the reasons that you
 20 had for not disclosing them. Starting, then,
 21 with the receipts and payments mismatch bug.
 22 Can we begin by looking at POL00055410. If
 23 we look at the bottom of page 1., we can see
 24 an email of 8 October 2010 from Alan Simpson,
 25 a member of the Security team, described as the

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1 the fundamental issue of the integrity of
 2 Horizon, and you advising three months later
 3 "There will be consequences, adverse
 4 consequences, if we get an independent expert in
 5 to examine the integrity of Horizon"?
 6 A. No, there was no connection at all. The next
 7 email in this chain is me effectively saying to
 8 Mark Dinsdale, "This is an important case and we
 9 need to deal with it thoroughly". I didn't
 10 acquiesce to his request, if I can put it that
 11 way, to effectively support him in what he was
 12 saying. I was saying "Look, get on with it".
 13 Q. Thank you. Can we move on to something that you
 14 say in your witness statement, please, at
 15 page 15.
 16 Page 15, please, paragraph 17. I'm asking
 17 you a series of questions here, firstly about
 18 what's known as the receipts and payments
 19 mismatch bug and then, secondly, the duplicated
 20 records issue. You say "I have considered"
 21 three documents and you give us the numbers.
 22 You say:
 23 "At the time I did not consider the issues
 24 discussed in the correspondence had a relevance
 25 to the Seema Misra case and, accordingly, did

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1 Security Incident Senior, high importance and
 2 confidential, subject "Branch discrepancy
 3 issues":
 4 "Rob,
 5 "I am forwarding you the attachments above
 6 in relation to a series of incidents, identified
 7 by Fujitsu this week, whereby it appears that
 8 when posting discrepancies to the local
 9 suspense, these amounts simply disappear at
 10 branch level and a balance is shown.
 11 "The above includes Fujitsu's initial
 12 analysis and proposed solution/s, whilst the
 13 other documents the outputs from various
 14 meetings held this week. My concern is around
 15 the proposed solution/s, one or more of which
 16 may have repercussions in any future prosecution
 17 cases and on the integrity of the Horizon Online
 18 system.
 19 "There is a further dial-in meeting this
 20 afternoon at 3.00 pm to 3.30 pm should you wish
 21 to attend or failing that, as I know this is
 22 very short notice, if there are any
 23 comments/questions you would like me to offer on
 24 your behalf please drop me a note. The meeting
 25 details as follows ..."

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1 So he says that what he's enclosing is
 2 an initial analysis, correct?
 3 **A.** Yes.
 4 **Q.** He says that the solutions proposed may have
 5 repercussions for prosecution cases and may have
 6 repercussions on the integrity of Horizon
 7 Online?
 8 **A.** For future prosecution cases, yes.
 9 **Q.** Yes. Yes, future prosecution cases, and on the
 10 integrity of Horizon Online. There's
 11 an invitation to a telephone conversation. If
 12 we just scroll up, please, we see you forwarding
 13 that email to Juliet McFarlane and Jarnail
 14 Singh, and you say:
 15 "Clearly I missed the call as we were at our
 16 meeting."
 17 So it looks like the invitation to the 3.00
 18 to 3.30 call you weren't present on because you
 19 yourself were in a meeting with Juliet McFarlane
 20 and Jarnail Singh, correct?
 21 **A.** Yes, I think that's right.
 22 **Q.** Have I interpreted that correctly?
 23 **A.** Yes.
 24 **Q.** Who had responsibility, amongst you,
 25 Ms McFarlane and Mr Singh, for deciding what was

1 **Q.** If we look at the attachment, please.
 2 POL00028838. So this is the thing that
 3 Mr Simpson has sent on to you, yes?
 4 **A.** I think there were -- yes, that's the email.
 5 Yes.
 6 **Q.** Yes, there were two attachments?
 7 **A.** There were two attachments to that, yes.
 8 **Q.** If we scroll on, please, to page 6. That's the
 9 second attachment, a report from Mr Jenkins.
 10 **A.** Yes.
 11 **Q.** So back to page 1, please. You'll see that it's
 12 either a record of what's happened at a meeting,
 13 or a record or a statement of what is to happen
 14 at a meeting?
 15 **A.** I didn't appreciate the differences but --
 16 **Q.** You'll see as we go through it --
 17 **A.** -- I'll accept what you say, yes.
 18 **Q.** -- there are, I think, four members of Fujitsu
 19 staff present: Mike Stewart, John Simpkins,
 20 Gareth Jenkins and Mark Wright; and everyone
 21 else, including Mr Simpson and Mr Winn, is Post
 22 Office? Can you see that?
 23 **A.** Yes.
 24 **Q.** There are no lawyers present; is that right?
 25 **A.** Yes, that's correct.

1 to happen here by way of disclosure in at least
 2 the Seema Misra case?
 3 **A.** Well, Mr Singh was allocated the case, so he
 4 would have dealt with disclosure.
 5 **Q.** Why were you forwarding the email to both
 6 Jarnail Singh and Juliet McFarlane?
 7 **A.** Well, because they both needed to understand
 8 what Alan Simpson had said in the first email,
 9 which I understand had attachments to it.
 10 **Q.** Why did Juliet McFarlane need to understand?
 11 **A.** Well, because she had cases. So she needed to
 12 be in the loop.
 13 **Q.** Why not all members of the Criminal Law Team?
 14 **A.** They were the people who dealt with the Post
 15 Office prosecutions.
 16 **Q.** There was no one else other than Ms McFarlane
 17 and Mr Singh?
 18 **A.** No.
 19 **Q.** So you're essentially telling the whole of the
 20 team there's this issue?
 21 **A.** Yes.
 22 **Q.** You say Mr Singh had responsibility for deciding
 23 whether to give disclosure of it in Seema
 24 Misra's case and Ms McFarlane in her cases?
 25 **A.** Yes.

1 **Q.** "What is the issue?
 2 "Discrepancies showing at the Horizon
 3 counter disappear when the branch follows
 4 certain process steps, but will still show
 5 within the back end branch account. This is
 6 currently impacting around 40 branches since
 7 migration on to Horizon Online with an overall
 8 cash value of around £20,000 loss. This issue
 9 will only occur if a branch cancels the
 10 completion of the trading period but within the
 11 same session continues to roll into a new
 12 balance period.
 13 "At this time we have not communicated with
 14 branches affected and we do not believe they are
 15 exploiting this bug intentionally.
 16 "The problem occurs as part of the process
 17 when moving discrepancies on the Horizon system
 18 into Local Suspense.
 19 "When discrepancies are found during stock
 20 rollover into a new transaction period then the
 21 user is asked if the discrepancy should be moved
 22 to Local Suspense. If the branch presses cancel
 23 at this point the discrepancy is zeroed on the
 24 Horizon system.
 25 "Note at this point nothing needs into

1 POLSAP and Credence ..."
 2 Did you know what POLSAP and Credence were?
 3 **A.** I don't think so.
 4 **Q.** "... so in effect the POLSAP and Credence shows
 5 the discrepancy whereas the Horizon system in
 6 the branch doesn't. So the branch will then
 7 believe they have balanced.
 8 "If at the next screen the rollover is
 9 completely cancelled, no harm is done. However,
 10 if the rollover is reattempted at this point,
 11 the rollover will continue without any
 12 discrepancy meaning Horizon doesn't match POLSAP
 13 or Credence.
 14 "... following consequences:
 15 "There will be a receipts and payments
 16 mismatch corresponding to the value of
 17 discrepancies that were 'lost'.
 18 "Note the branch will not get a prompt from
 19 the system to say there is a mismatch, therefore
 20 the branch will believe they balanced correctly.
 21 "When the branch begins the new Branch
 22 Trading period the discrepancies will show at
 23 zero, however the receipts and payments mismatch
 24 will carry over on to the next period."
 25 Stopping there, would you have understood
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1 cases", would you have understood that that
 2 referred to both Horizon Online and Legacy
 3 cases?
 4 **A.** Not necessarily.
 5 **Q.** Would you have understood that it was
 6 restricting the potential impact to only
 7 existing prosecutions when Horizon Online data
 8 was being relied on?
 9 **A.** I'm sorry, could you put that again?
 10 **Q.** Yes. Would you have understood the potential
 11 impact to ongoing legal cases, therefore, to be
 12 restricted to cases where Horizon Online data
 13 was referred to?
 14 **A.** What I would have understood it to mean,
 15 I think, was it was a fault with the new Horizon
 16 system, if I can put it that way, and it didn't
 17 occur in the old Horizon system, is how
 18 I believe I understood it.
 19 **Q.** How could it impact on ongoing legal cases,
 20 ie existing cases?
 21 **A.** Because they'd migrated onto Horizon Online,
 22 I guess.
 23 **Q.** So the ongoing legal cases, would you have
 24 understood that to have been a reference to
 25 prosecutions that were based, and only based, on
 99

1 what was being said here?
 2 **A.** I think, broadly speaking, yes.
 3 **Q.** Would you agree that it's a significant problem
 4 in the sense that it directly affects balances?
 5 **A.** Yes.
 6 **Q.** It's a significant problem because there is no
 7 warning or telltale that tells the subpostmaster
 8 what has gone on?
 9 **A.** Yes.
 10 **Q.** It's invisible to them?
 11 **A.** Yes.
 12 **Q.** "Impact
 13 "The branch appears to have balanced whereas
 14 in fact they could have a loss or a gain.
 15 "Our accounting systems will be out of sync
 16 with what is recorded at the branch.
 17 "If widely known it could cause a loss of
 18 confidence in the Horizon system by branches.
 19 "Potential impact on ongoing legal cases
 20 where branches are disputing the integrity of
 21 Horizon data.
 22 "It could provide branches ammunition to
 23 blame Horizon for future discrepancies."
 24 In relation to the fourth those bullet
 25 points, "Potential impact on ongoing legal
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1 Horizon Online data, ie prosecutions that were
 2 up and running in October 2010, ie had occurred
 3 in the relatively short period since Horizon
 4 Online had come online?
 5 **A.** Yeah, I can see what you're saying. I wouldn't
 6 have understood -- I don't think I would have
 7 understood that at the time because, as I said
 8 before, I understood that the two were separate.
 9 But I can understand what you're saying from
 10 that bullet point, yes.
 11 **Q.** Under the heading "Identifying the issue and
 12 forward resolution", over the page, please:
 13 "The receipts and payments mismatch will
 14 result in an error code being generated which
 15 will allow the Fujitsu to isolate branches
 16 affected by this problem, although this is not
 17 seen by the branches. We have asked Fujitsu why
 18 it has taken so long to react to and escalate
 19 an issue which began in May. They will provide
 20 feedback in due course."
 21 Again, logically, if the issue only began in
 22 May, ie May 2010, that previous reference to
 23 ongoing cases, if you're right that this was
 24 a problem that could only afflict Horizon Online
 25 data, could only be a reference to cases where
 100

1 theft or false accounting had been alleged to
 2 have occurred between May 2010 and October 2010
 3 and the prosecution had got up and running by
 4 then?

5 **A.** Yes.

6 **Q.** "Fujitsu are writing a code fix which will stop
 7 the discrepancy disappearing from Horizon in the
 8 future. They're aiming to deliver this into
 9 test week commencing 4 October. With live
 10 proving at the model office week commencing
 11 11 October. With full rollout to network
 12 complete by 21 October. We've explored moving
 13 this forward and this is the earliest it can be
 14 released into live.

15 "The code fix will on stop the issue
 16 occurring in the future but it will not fix any
 17 current mismatch at branch.

18 "Proposal for affect Branches

19 "There are three potential solutions to the
 20 impacted branches, the group's recommendation is
 21 that solution two should be progressed:

22 "ONE -- alter the Horizon branch figure at
 23 the counter to show the discrepancy. Fujitsu
 24 ... manually write an entry value to the local
 25 account.

1 data. Is that not the kind of backdoor or
 2 remote access?

3 **A.** Well, it says "Alter the Horizon branch figure
 4 at the counter". I assume that meant at the
 5 branch counter. I mean --

6 **Q.** That sounds like backdoor access, doesn't it,
 7 remote access: altering figures at the counter
 8 without the subpostmaster's knowledge?

9 **A.** Well, no. It sounds totally dishonest. It's
 10 appalling but, as I understood that or as
 11 I understand it, it's not a backdoor in the
 12 sense that it's Fujitsu premises and Fujitsu
 13 hardware that's altering the data. It's
 14 somebody physically going to the counter in the
 15 Post Office to alter the data. And I don't know
 16 how they proposed to do that but I didn't read
 17 that as being a backdoor.

18 **Q.** Surely, if you're right that this was physically
 19 sending individuals out and altering data, the
 20 people at the branch would know that was
 21 happening, and yet this reads "This would have
 22 moral implications of Post Office changed branch
 23 data without informing the branch".

24 **A.** Well, yeah, they would know something was
 25 happening but it depended on what Fujitsu were

1 "IMPACT -- When the branch comes to complete
 2 next trading period they would have
 3 a discrepancy, which they would bring to
 4 account.

5 "RISK -- Significant data integrity concerns
 6 and could lead to questions of 'tampering' with
 7 the branch and could generate questions around
 8 how the discrepancy was caused. This solution
 9 could have moral implications of Post Office
 10 changing branch data without informing the
 11 branch."

12 Just stopping there, reflecting on an answer
 13 that you gave earlier when you said that, after
 14 the judgment, you spoke to Dave Posnett about
 15 remote access --

16 **A.** Yes.

17 **Q.** -- and backdoors into Horizon, and he told you
 18 that you had been told at a meeting that there
 19 were no such backdoors or remote access.

20 **A.** Yes.

21 **Q.** This tends to suggest that there was a facility
 22 for altering figures at the counter by Fujitsu
 23 manually writing an entry, which would lead to
 24 questions of tampering and would have moral
 25 implications of the Post Office changing branch

1 going to tell them was happening or -- I mean,
 2 it's solution 1 -- well, all the three solutions
 3 there are totally unacceptable, which is why
 4 I think I emailed both Jarnail and Juliet so
 5 quickly on the day that it occurred and tried to
 6 phone -- is it Alan Simpson -- to find out more
 7 about what was going on and to agree with him,
 8 effectively, that these three solutions were
 9 pretty outrageous.

10 The only solution that I saw was to tell
 11 each branch individually that we have a problem,
 12 and I think the closest that that gets to is
 13 Gareth Jenkins' second attachment, which
 14 actually does say words similar to that.

15 But these -- these solutions -- I mean,
 16 I don't know who these people were from Fujitsu.
 17 The only person I know or knew of was Gareth
 18 Jenkins. I don't know how senior these people
 19 were but they were -- but I shared the concerns
 20 of Alan Simpson and just thought this is
 21 ridiculous. And I'm pretty sure I will have
 22 tried to ring him that afternoon and then get --
 23 and, if I didn't get hold of him then,
 24 I would've rung him the next day. So I would
 25 have been in contact with him quickly and said,

1 "Look, we need to come up and tell each branch
2 there is a problem. Never mind any of these
3 three solutions, which are pretty appalling".

4 **Q.** The second solution is:

5 "Product and Branch Accounting will journal
6 values from the discrepancy account into the
7 Customer Account and recover/refund via normal
8 provides. This will need to be supported by
9 an approved Post Office communication. Unlike
10 the branch 'POLSAP', remains in balance albeit
11 with an account (discrepancies) that should be
12 cleared.

13 "IMPACT -- Post Office will be required to
14 explain the reason for debt recovery/refund even
15 though there's no discrepancy at the branch.

16 "RISK -- Could potentially highlight to
17 branches that Horizon can lose data.

18 "SOLUTION THREE -- It is decided not to
19 correct data in the branches (ie Post Office
20 will prefer to write off the 'lost').

21 "IMPACT -- Post Office must absorb about
22 a £20,000 loss.

23 "RISK -- huge moral implications to the
24 integrity of the business, as there are agents
25 that were potentially due a cash gain on their

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1 **Q.** If we go over the page, please. There's
2 a series of action points; can you see that?

3 **A.** Yes.

4 **Q.** Then over the page, you will see that none of
5 them relates to, I think, disclosure in legal
6 proceedings?

7 **A.** Yes.

8 **Q.** In the email that was sent to you, no solution
9 of the three or any other solution is
10 identified, is it?

11 **A.** What do you mean, no solution?

12 **Q.** That the paper identified three possible
13 solutions --

14 **A.** Yes.

15 **Q.** -- there was a recommendation --

16 **A.** Mm.

17 **Q.** -- but there was nothing in the paper nor the
18 covering email that said Solution One, Two or
19 Three, or another solution, has been selected by
20 the Post Office client?

21 **A.** No, no, I think this was a -- I think Alan
22 Simpson must have emailed me this very quickly
23 and presumably had been put out by Fujitsu as
24 the discussion point for the meeting. So
25 I don't think POL -- any senior managers -- will

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1 system."

2 It says here that the group's recommendation
3 is Solution Two; can you see that?

4 **A.** Yes.

5 **Q.** Would you agree that the thinking here
6 discloses, as a significant problem, a solution
7 that reveals to branches that there might be
8 a problem with Horizon's integrity ie in the
9 thinking of those involved, disclosed by this
10 minute, it seems though, "If we do X it's
11 a relevant consideration that it will reveal to
12 subpostmasters that there may be problems with
13 Horizon integrity"?

14 **A.** Yes.

15 **Q.** Was there a belief or mindset within the Post
16 Office that that is a bad thing: "If we tell
17 postmasters that there's a problem with Horizon,
18 even if there is, that is generally a bad
19 thing"?

20 **A.** The more I read these papers, the more I get the
21 impression that, certainly at a senior level,
22 that was the attitude. At my level, we should
23 have been completely upfront and that's what
24 I was agreeing with Alan Simpson: "We need to
25 tell these people".

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1 have had time to consider or say what their
2 views were in relation to this. It was simply
3 Alan Simpson's view, which I agreed with.

4 **Q.** You tell us in your witness statement that you
5 took the view that the receipts and payments
6 mismatch bug was not disclosable in Seema
7 Misra's case because, in your understanding, the
8 issue only afflicted Horizon Online, and the
9 Horizon records relied on in her case had been
10 generated by Legacy Horizon?

11 **A.** Yes.

12 **Q.** You now, I think, recognise that view to be --
13 that advice to be wrong?

14 **A.** Yes.

15 **Q.** You'd emailed the note of the problem to Jarnail
16 Singh and Juliet McFarlane. Did you
17 subsequently discuss what was to be done with
18 either or both of them?

19 **A.** I am pretty sure. I mean, we had an office
20 meeting that they were -- both will have been
21 at. I'd gone back to my desk, I'd seen the
22 email -- I've forgotten the Investigator's name
23 again.

24 **Q.** Alan Simpson.

25 **A.** I'd seen Alan Simpson's email and, I think,

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1 within an hour of getting it and reading it, I'd
2 emailed it to both of them, and I'm pretty sure
3 I will have discussed it -- well, I'm pretty
4 sure that the first point of call will have been
5 to try to get hold of Alan Simpson. But then,
6 I will have discussed it with both of them, and
7 I'm sure that they will have been pretty shocked
8 at the suggestion -- the three solutions that
9 we've just been through. It wasn't something
10 that I would not have discussed with them.
11 I would have discussed with them, yes.

12 **Q.** Just before we break for lunch -- we're going to
13 have to come back to this after lunch -- what
14 was the outcome of your discussion?

15 **A.** That they agreed.

16 **Q.** Agreed with what?

17 **A.** What I was saying, that, actually, we need to
18 tell these people.

19 **Q.** The "these people" in that sentence is who?

20 **A.** Is the subpostmasters.

21 **Q.** Which subpostmasters?

22 **A.** The ones that are affected.

23 **Q.** What about disclosure in criminal cases?

24 **A.** I don't think we ever got in to that topic. At
25 that stage, the main concern would have been

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1 **A.** Horizon Online being the new?

2 **Q.** Yes.

3 **A.** Yes.

4 **Q.** What steps did you take to ensure that it was so
5 disclosed?

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

7 **Q.** We've seen no record of a meeting or email in
8 which any advice or instruction was given that
9 it should be disclosed in future cases or
10 existing cases that relied on Horizon Online
11 data.

12 **A.** Yes.

13 **Q.** Did you discuss the issue with Jarnail Singh or
14 Juliet McFarlane?

15 **A.** I certainly discussed the immediate issue that
16 we had.

17 **Q.** What was the immediate issue that you had?

18 **A.** The immediate issue was notifying each of the
19 branches individually what had happened.

20 **Q.** Wasn't even more immediate than that any case in
21 which there was a prosecution founded upon data
22 that included the relevant period?

23 **A.** Yes.

24 **Q.** Did Mr Singh take a particular interest in this
25 issue because of the Seema Misra case?

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1 this.

2 **MR BEER:** Thank you.

3 Sir, I wonder whether we might break until

4 2.00.

5 **SIR WYN WILLIAMS:** Yes, 2.00. Thank you very much.

6 **MR BEER:** Thank you very much, sir.

7 (1.01 pm)

8 (The Short Adjournment)

9 (1.59 pm)

10 **MR BEER:** Good afternoon, sir, can you see and hear
11 us.

12 **SIR WYN WILLIAMS:** Yes, thanks.

13 **MR BEER:** Thank you.

14 Good afternoon, Mr Wilson. We were looking
15 at the receipts and payments mismatch bug and
16 either the record of the meeting or a record for
17 the meeting in October 2010, which was sent to
18 you by Mr Simpson.

19 **A.** Yes.

20 **Q.** Even if you thought that the receipts and
21 payments mismatch issue could not have affected
22 Mrs Misra's case because her case was one which
23 relied on data under the old Legacy Horizon
24 system, did occur to you that it should be
25 disclosed in any case involving Horizon Online?

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1 **A.** I honestly don't know whether Mr Singh did, or
2 Ms McFarlane, at the time. I can't think back
3 other than I recall that -- from -- again, from
4 the documents, that I responded pretty quickly
5 and copied them into the email and I'm pretty
6 sure I will have had a discussion with them
7 probably prior to even speaking to Alan Simpson,
8 but I can't recall any further details.

9 **Q.** Can we look, please, at POL00028838 again,
10 please, and go to page 6, please. This was the
11 second of the attachments to Mr Simpson's email
12 to you.

13 **A.** Yes, Gareth Jenkins.

14 **Q.** It's a three-page, four-page report by
15 Mr Jenkins, dated 29 September. If you look at
16 the foot of the page, can you see that it seems
17 to have been saved in or taken from a C-drive
18 attributed to Jarnail Singh?

19 **A.** Yes.

20 **Q.** Can you see that it was printed at 4.38 on the
21 8 October?

22 **A.** Yes.

23 **Q.** 8 October was a Friday and Seema Misra's trial
24 started on Monday, the 11, okay?

25 **A.** Yes.

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1 Q. What discussion was there about whether Mr Singh
2 needed to disclose either this document or some
3 other document recording information about the
4 receipts and payments mismatch bug?
5 A. I just -- I don't recall.
6 Q. You said in your witness statement, we saw it in
7 paragraph 17, that you now accept that the wrong
8 decision was made --
9 A. Yes.
10 Q. -- not to disclose it --
11 A. Yes.
12 Q. -- or to not disclose it. Who made that
13 decision not to disclose the information about
14 the receipts and payments mismatch bug?
15 A. It was my -- I'm saying I made the wrong
16 decision.
17 Q. Yes. So were you the relevant decision maker
18 then?
19 A. You mean in relation to the *Misra* file?
20 Q. Yes?
21 A. No, I wasn't, I was saying in general terms my
22 view was there were two different systems. I'm
23 not saying that I communicated that with anybody
24 else or that I persuaded anybody else to be of
25 that view at all. I can't recall the

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1 Q. This note is written by Mr Jenkins and, if we go
2 forward to page 9, please, and look at the last
3 paragraph -- it must be page 8, scroll down,
4 please. Yes, "Communication with [the Post
5 Office]". Mr Jenkins says:
6 "Once we have the information from Section 4
7 which will enable us to life the full scope of
8 the issue we need to communicate this to the
9 Post Office through the problem management
10 mechanisms. We will then need to get Post
11 Office Limited to agree if/how we should be
12 correcting the data.
13 "Post Office should also be able to check up
14 on POLSAP to confirm that these discrepancies
15 are still visible even though they have been
16 lost in the branch.
17 "... as discrepancies are normally losses,
18 then a lost discrepancy would normally work in
19 the branch's favour and so there is no incentive
20 for the branch to report the problem. Also, if
21 we do amend the data to re-introduce the
22 discrepancy, this will need to be carefully
23 communicated to the branches to avoid questions
24 about system integrity."

Was there a concern within the Post Office

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1 discussions. But looking back, that's how
2 I viewed it.
3 Q. Isn't it likely that you had a discussion with
4 Mr Singh, you referred in an email that we saw
5 before lunch to meeting with him and Juliet
6 McFarlane on the Friday?
7 A. Yes.
8 Q. Mr Singh has printed out Gareth Jenkins' report?
9 A. Yes.
10 Q. It's 4.38 on a Friday when this is printed and
11 he's got a trial starting on Monday.
12 A. I mean, he may well have printed it out to take
13 it to court with himself, I don't recall.
14 Q. If he did, it stayed in his bag because it was
15 not disclosed. My question is: did you discuss
16 it with him and Juliet McFarlane, the disclosure
17 of it into the Seema Misra trial?
18 A. If I'd said to him, for the sake of argument,
19 it's not disclosable, I don't see why he's
20 printing it out on the Friday afternoon at all.
21 I think that's probably an indication that he
22 was taking it to court.
23 Q. The notes we saw showed that Mr Jenkins was
24 present at the meeting.
25 A. Yes.

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1 that any communication to the branches about the
2 problem should avoid questions about system
3 integrity?
4 A. Well, I think, inevitably, if you're going to
5 tell them that this is the problem, people will
6 question it. I don't think they can get around
7 that. Whether they like us informing the
8 branches or not, Post Office Limited are stuck
9 with the problem.
10 Q. Mr Jenkins was going to be called as a witness
11 in a trial that was going to start the following
12 Monday.
13 A. Yes.
14 Q. Did you or, to your knowledge, Mr Singh speak to
15 Mr Jenkins after your meeting to communicate
16 what the Post Office's position was concerning
17 disclosure of this issue in the *Misra* trial?
18 A. I didn't. I don't know whether Mr Singh did.
19 Q. Was anything agreed in your meeting with
20 Mr Singh about what would be communicated to
21 Mr Jenkins?
22 A. I'm not sure I had a meeting with Mr Singh
23 specifically about *Misra*. I think I had
24 a discussion with him and Juliet about the
25 problem.

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1 Q. But you're there on a Friday afternoon with
 2 Mr Singh, knowing he's got a trial starting on
 3 the Monday, surely the immediate issue, the
 4 really immediate issue, is: have we got to
 5 disclose it?
 6 A. Well, I go back to what I said earlier, that
 7 I think if he's copying that out at 6.38 --
 8 Q. 4.38.
 9 A. -- sorry, 4.38, he must be intending to take it
 10 to court with him. I mean, I can't see why he
 11 would print it out otherwise.
 12 Q. Are you implying that you may have had the
 13 belief that Mr Singh did intend to disclose this
 14 in the Misra case?
 15 A. No, I have no idea. I would like to be able to
 16 answer your question but I have no idea what was
 17 in his brain.
 18 Q. If instructions hadn't been given to Mr Singh or
 19 Mr Singh hadn't made a decision to communicate
 20 with Gareth Jenkins, there would be a risk that,
 21 in the course of the evidence that Gareth
 22 Jenkins was to give, he might disclose this?
 23 A. Yes.
 24 Q. Was there any plan to tell Mr Jenkins what he
 25 could or could not say when he gave evidence in
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1 hold of him.
 2 Q. You now say that you accept that the receipts
 3 and payments mismatch bug should have been
 4 disclosed, I think, to the defence in the *Misra*
 5 case?
 6 A. To everybody, or anybody in the future, yes.
 7 Q. Is that acceptance or concession made because
 8 you know that leading counsel for the Post
 9 Office in the course of the *Hamilton* trial --
 10 the *Hamilton* appeal, rather, himself accepted
 11 before the court that the receipts and payments
 12 mismatch bug fell to be disclosed in all
 13 prosecutions?
 14 A. I wasn't aware of that detail anyway. This is
 15 something that was in my brain.
 16 Q. You knew at the time the test for disclosure
 17 under the CPIA?
 18 A. Yes.
 19 Q. The notes that you'd been sent made it clear
 20 that the bug impacted on balances --
 21 A. Yes.
 22 Q. -- and the notes, as we saw before lunch, made
 23 it clear that there was a potential impact on
 24 ongoing legal cases?
 25 A. Yes.

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1 the Misra case?
 2 A. No. Certainly not from myself, no. I mean,
 3 personally, I think that Mr Jenkins, dealing
 4 with this issue, immediately before *Misra*,
 5 I would have thought he would have told
 6 Mr Tatford, in any event.
 7 Q. Why do you think Mr Tatford would be involved?
 8 A. Well, because he was the person who was going to
 9 cross -- was going to examine him in chief.
 10 Q. We've seen from a number of communications that
 11 when any issue concerning disclosure arose,
 12 Mr Singh contacted Warwick Tatford for his
 13 advice?
 14 A. Yes.
 15 Q. We've seen that when Mr Singh wanted something
 16 drafted, he asked Mr Tatford and Mr Tatford
 17 would sometimes draft letters and, in one case,
 18 even an email for Mr Singh?
 19 A. Yes.
 20 Q. Do you know why, in relation to this issue,
 21 there was no communication to Mr Tatford about
 22 the existence of the receipts and payments
 23 mismatch bug?
 24 A. No, I don't. It may be that he thought it's
 25 late on a Friday night, I won't be able to get
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1 Q. Given those three things, how is it that you
 2 decided that that it need not or should not be
 3 disclosed?
 4 A. I viewed it as being a completely different
 5 system and, therefore, no chance of the two
 6 colliding.
 7 Q. What's changed now?
 8 A. Well, I've thought about it more. Obviously,
 9 I've seen lots more papers. I've listened to
 10 the YouTube, some witnesses, and I just think
 11 that we should have basically disclosed any bug
 12 at any time.
 13 Q. Can we turn to the duplicated records issue.
 14 That's the third of the references that you gave
 15 in that paragraph 17 of your witness statement.
 16 A. Yes.
 17 Q. In paragraph 17, you say that that too was not
 18 disclosable because it related to Horizon Online
 19 and, therefore, didn't affect Horizon Legacy
 20 cases.
 21 Can we look, please, at FUJ00122995. Can we
 22 start with page 5, please, if we just scroll
 23 down. Thank you.
 24 13 September, Mark Dinsdale to Juliet
 25 McFarlane:

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1 "Duplication of transaction records in ARQ
2 returns":
3 "Juliet, do you think this draft would be
4 okay. I'll run it past Penny at Fujitsu and ask
5 them to 'top and tail' it into a witness
6 statement, if you're happy with it ..."
7 Then the draft:
8 "On audits of transactions, there occurs
9 a duplication of records when records were in
10 the process of being recorded purely for audit
11 purposes from the correspondence servers to the
12 audit servers. This has always been the case;
13 however the mechanism used on Horizon to
14 retrieve audit data took this into account and
15 only presented one instance of such duplicate
16 data. As offices have migrated to the new
17 [Horizon Online] application, any requests made
18 for audit data during this period, the mechanism
19 used to filter out duplicates did not remove
20 them from the audit data.
21 "The duplicates only occur in the audit
22 data, and does not affect the actual physical
23 transactions recorded on any counter at any
24 outlet.
25 "This problem has now been resolved, however
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1 doubt as whether or not it has been previously
2 audited successfully.
3 "The Mechanism used on Horizon to retrieve
4 the data took this into account and only
5 presented one instance of such duplicate data in
6 ARQ extracts.
7 "... it has recently been noticed that the
8 [Horizon Online] retrieval mechanism does not
9 remove such duplicates and a quick scan of the
10 ARQs provided to the Post Office since the
11 change to the new system indicates that about
12 35% of the ARQs might contain some duplicate
13 data. A PEAK has been raised to enhance the
14 extraction [toolkit] ... However until the fix
15 is developed, tested and deployed, there is
16 a possibility that data is duplicated."
17 Skip the next paragraph:
18 "... we have identified a scenario with
19 Postal Services transactions where multiple,
20 identical mails items are accepted ... but
21 Postage Labels are printed ..."
22 I don't think I need to read the rest of it.
23 Then if we carry on scrolling up, please --
24 thank you, and again -- we can see that Jane
25 Owen sends out to a number of people within the
123

1 a small number of audit requests made during the
2 period from [Legacy Horizon] migration until the
3 resolve will show the duplicate transactions."
4 What do you understand is being said by that
5 email?
6 **A.** I think it's saying that, under the old system,
7 there wouldn't be a duplication but under the
8 new system there is.
9 **Q.** And it's afflicting data that is or may be
10 presented to a court?
11 **A.** Yes.
12 **Q.** Thank you. Can we move on to POL00169416, and
13 scroll down to the bottom of the chain, at
14 page 3 at the bottom and onto page 4. This is
15 perhaps an easier to understand explanation.
16 You'll see it's from Penny Thomas to three
17 people, Sue Lowther, Mark Dinsdale and Jane Owen
18 in the Post Office:
19 "We have identified that a number of recent
20 ARQ returns contain duplicated transaction
21 records.
22 "With Horizon counters, the mechanism by
23 which Data is audited has always worked on the
24 principle that it is acceptable to audit the
25 same data more than once -- in particular if in
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1 Post Office that email we've just read, and
2 says:
3 "Mark, Alan Simpson and myself have had
4 a conference call today to look at potential
5 problems that this is likely to cause. Firstly,
6 the suggested workaround will need to be put to
7 our Legal Team and until that has been agreed
8 any further ARQ requests, including those which
9 have been submitted, will be suspended.
10 "There are 2 cases currently with the
11 court -- West Byfleet ..."
12 That's Seema Misra's case, yes?
13 **A.** Yes.
14 **Q.** "... and Porters Avenue and I will speak to Lisa
15 and Jon about these as we need to know what in
16 the way of ARQs and the corresponding statements
17 have been presented to court."
18 Then there is a list of additional cases.
19 If you scroll down:
20 "... a lot to digest [ask for clarification
21 if you need it]."
22 Then if we carry on scrolling up, we'll see
23 that's sent on to Jon Longman, who is the
24 Investigator in the Seema Misra case.
25 **A.** Yes.
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1 Q. Can we go, please, to POL0061056. This a notice
2 of additional evidence in the Seema Misra case.
3 If we scroll down a page, please, we will see
4 that it's signed off by Mr Singh. Then the next
5 page, we'll see it's a witness statement from
6 Mr Jenkins -- can you see that --

7 A. Yes.

8 Q. -- of 8 July. Then if we go to page 3, can we
9 see "With Horizon counters, the mechanism by
10 which data is audited", et cetera? Then the
11 next paragraph:

12 "In January 2010 a new [Horizon Online]
13 application was introduced", et cetera,
14 et cetera.

15 We see him giving disclosure of the --

16 A. Duplicates.

17 Q. -- the duplicate issue, don't we?

18 A. Yes.

19 Q. You've said in your witness statement that it
20 was your view that it didn't need to be
21 disclosed because it afflicted Horizon Online
22 only and not Legacy Horizon?

23 A. Yes.

24 Q. Why did you take that view?

25 A. Well, because, like I said before, I saw them as
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1 *Misra* case --

2 A. When I was making my statement I just recalled
3 believing that the two different -- there were
4 two different systems and, therefore, disclosure
5 was not necessary. Now, that was my memory of
6 making the witness statement and, clearly, it
7 has been disclosed in this particular case and,
8 clearly, I didn't give anybody an instruction to
9 that effect.

10 Q. Thank you. That can come down.

11 Can we turn directly to the Seema Misra case
12 then and start with the charging decision. In
13 paragraph 5 of your witness statement -- there's
14 no need to turn it up -- you tell us that you do
15 not know who authorised the prosecution of
16 Mrs Misra.

17 A. It's probably in the papers somewhere. I just
18 couldn't find it.

19 Q. Well, I don't think we can tell who authorised
20 it either.

21 A. Right.

22 Q. What piece of paper would you expect to exist to
23 show who authorised the prosecution of Seema
24 Misra?

25 A. Well, I'd expect to see a letter on the file
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1 two different systems.

2 Q. In fact, we can see that disclosure of this bug,
3 I'll call it, was given --

4 A. Yes.

5 Q. -- even though, in your view, it afflicted only
6 Horizon Online?

7 A. Well, I obviously didn't communicate it with
8 Jarnail or Juliet because I think Juliet -- was
9 this -- this was Juliet's duplicate problem.

10 Q. Why was it Juliet's duplicate problem?

11 A. Because she was the one on the email who was
12 contacted by -- was it Mark --

13 Q. Mark Dinsdale?

14 A. Yeah, and I think she organised the statement,
15 and, whether this is the same statement or not,
16 I'm not sure but it certainly was disclosed on
17 the *Misra* case, yes.

18 Q. So just help us one more time, then. Why did
19 you think it needn't be disclosed and yet it
20 ended up being disclosed, because you've drawn
21 a distinction between things that affect Legacy
22 Horizon only and things that affect Horizon
23 Online only --

24 A. Yes.

25 Q. -- as the basis for the explanation for why the
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1 from the Casework Team informing us who the
2 decision maker was and that they'd made the
3 decision.

4 Q. So you'd expect an Investigator's report coming
5 in with some associated paperwork?

6 A. Yes.

7 Q. You'd expect some advice going out from a member
8 of the Criminal Law Team with advice on charge?

9 A. Yes.

10 Q. Then you would expect a letter from the Casework
11 Team saying Mr X or Mrs X has decided to
12 authorise prosecution?

13 A. Yes.

14 Q. In a case like Seema Misra, would you have seen
15 papers in and out like that?

16 A. Yes.

17 Q. So to what extent would you familiarise yourself
18 with the issues, or would you simply say, "This
19 is a letter concerning Seema Misra, that's got
20 to go to Jarnail"?

21 A. Yes, I received the post every day, unless
22 I wasn't in, in which case I delegated it to
23 whichever lawyer, senior lawyer was in, and so
24 I will have seen the post, divided it up, and
25 I will have taken it around to the lawyers and,
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1 whether they were in or not, and I'd put it in
2 their in-tray, because they may be in later in
3 the afternoon. So I would see post coming in to
4 the office, yes.

5 **Q.** To what extent did you engage with the contents,
6 rather than seeing to whom it was addressed and,
7 therefore, to whose in tray it should go to?

8 **A.** Oh, no, I think if there was something in the
9 contents which was interesting or worrying or,
10 for whatever reason, I wanted to discuss it,
11 I would have taken it to the lawyer and
12 discussed it with them.

13 **Q.** So, at the time, you were presumably aware that
14 Mrs Misra had been charged with both theft and
15 false accounting and had pleaded guilty to the
16 false accounting charge albeit the Post Office
17 didn't accept that plea and was seeking
18 a conviction for theft?

19 **A.** Yes.

20 **Q.** When you gave evidence back on 12 October, you
21 told us that you had directed the lawyers in the
22 Criminal Law Team not to charge both theft and
23 false accounting?

24 **A.** Yes.

25 **Q.** Did you discuss with Mr Singh why Mrs Misra had
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1 accounting as an alternative to theft?

2 **A.** I can't remember now but I imagine where there
3 were two separate incidents which would justify
4 separating the two charges.

5 **Q.** Is it fair to say that some lawyers within the
6 Criminal Law Team took a different view to you
7 on the propriety and desirability of charging
8 both?

9 **A.** No, that's a fair comment.

10 **Q.** What reasons, if any, did they give for taking
11 a different view to you?

12 **A.** I can't remember. I mean, they may have
13 attempted to argue what we've just been
14 discussing about charging them both. I don't
15 know.

16 **Q.** Did anyone give you an explanation along the
17 lines of "If we put false accounting on as
18 Count 2, 3, 4, 5, 6 [or whatever] we often get
19 pleas to those"?

20 **A.** I don't think there would be that -- I don't
21 think they would say that. They might think it
22 but I don't think they would say it to me.

23 **Q.** Can I turn to some other disclosure issues in
24 *Misra*. You've told us already, candidly, today,
25 that you accept that the wrong decision was
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1 been charged with both theft and false
2 accounting?

3 **A.** I don't know whether I did on the *Misra* case but
4 I certainly remember having discussions with
5 both Jarnail and Juliet in relation to putting
6 both sets of charges together because of the
7 case of *R v Eden*, and it was a bone of
8 contention that I did have with them.

9 **Q.** What was the nature of your bone of contention?

10 **A.** That they should be following what *R v Eden*
11 said.

12 **Q.** What was your understanding of what *Eden* said.

13 **A.** Basically, you have to pin your colours to the
14 mast.

15 **Q.** We've heard some expert evidence who said that
16 the Court of Appeal in *Eden* made it clear that
17 there will be cases where it is appropriate to
18 have a charge of false accounting as
19 an alternative charge to theft. Did you know
20 that at the time?

21 **A.** Yes, I read *Eden*, it was a Post Office case. It
22 was one of the first cases that was drawn to my
23 attention by my predecessor.

24 **Q.** What did you understand to be the circumstances
25 in which it was appropriate to charge false
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1 taken on disclosure in relation to issues that
2 you believe related only to Horizon Online and
3 did not afflict Legacy Horizon.

4 But you don't mention in your witness
5 statement documents that could or did relate to
6 the Horizon system before the switch in 2010.
7 I just want to explore some of those with you,
8 if I may?

9 **A.** Right.

10 **Q.** Can we start, please, with POL00044557. If we
11 go to the last page of this document, please,
12 you will see it's an Advice from Warwick
13 Tatford, dated 5 January 2010. You remember
14 when we were looking at that long disclosure
15 request that was cut into an email?

16 **A.** Yes.

17 **Q.** Eventually, Mr Singh sent that on to Mr Tatford
18 asking for his advice -- do you remember we saw
19 that this morning --

20 **A.** Yes, yes, yes.

21 **Q.** -- and this was the reply. If we go to page 3,
22 please, and look at paragraph 7., Mr Tatford
23 advises:

24 "I also think that our disclosure duty
25 requires us to ask Fujitsu whether they are
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1 aware of any other Horizon error that has been
2 found at any sub post office. I anticipate that
3 there will be none, but it is important that the
4 check is made."

5 Did you see this advice?

6 **A.** I don't recall seeing it, no.

7 **Q.** Would it be normal that, as part of the process
8 for post coming in, post going out, that you see
9 advices like this?

10 **A.** If it came in via the post, yes.

11 **Q.** Was there any system in place for you to see
12 significant documents that came in by email
13 only?

14 **A.** I had access to each of the lawyers' email
15 addresses for when they were on holiday but
16 I can't say, other than when they were on
17 holiday, I accessed their emails.

18 **Q.** You weren't checking whilst they were still
19 there?

20 **A.** No.

21 **Q.** Did that piece of advice that we see there ever
22 make its way through to you, so far as you can
23 recall?

24 **A.** I can't recall, I'm sorry.

25 **Q.** Can you recall whether it made its way through

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1 "When Gareth completes his statement could
2 he also mention whether there are any known
3 problems with the Horizon system that Fujitsu
4 are aware of. If there are none could this be
5 clarified in the statement."

6 **A.** Yes.

7 **Q.** Would you agree that what Mr Tatford has advised
8 has been watered down?

9 **A.** Um ...

10 **Q.** Maybe I can help you. The first respect in
11 which --

12 **A.** Fujitsu.

13 **Q.** Exactly. The first one was asking for
14 a third-party provider of the computer system,
15 so a third-party disclosure source, whether it,
16 the corporation, was aware of any other Horizon
17 problem at any sub post office.

18 **A.** Yeah.

19 **Q.** That's been translated to an address to
20 an individual to mention something?

21 **A.** Yeah, I mean, I'm not seeking to argue with you
22 but the second sentence also goes on to say,
23 "are any known problems with the Horizon system
24 that Fujitsu are aware of". So he's sort of
25 semi-redressing it.

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1 to you, in the context of any other case, that
2 prosecution counsel was advising that Fujitsu
3 should be asked of any other Horizon error that
4 has been found at any sub post office? That's
5 quite a broad statement, I think, isn't it?

6 **A.** Yes. I don't recall.

7 **Q.** Presumably, if you drew a distinction between
8 Horizon Online and Legacy Horizon, such advice
9 might conflict with that distinction?

10 **A.** Yes, but again, I'm not sure I communicated it
11 with either Mr Singh or Ms McFarlane and
12 I certainly wouldn't have communicated it with
13 counsel.

14 **Q.** In any event, if you remember the formulation
15 there of Mr Tatford:

16 "... our disclosure duty requires us to ask
17 Fujitsu ... any other Horizon error that's been
18 found at any sub post office."

19 Can we go forward, please, to FUJ00152902
20 and look at page 2, please. Can we see an email
21 here from Mr Longman, dated 1 February, so just
22 after that advice, and can you see paragraph 3
23 of Mr Longman's email to Fujitsu?

24 **A.** Yes.

25 **Q.** He says:

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1 **Q.** He's narrowing and then broadening it?

2 **A.** Yes.

3 **Q.** Did this translation or transliteration of
4 Mr Tatford's advice, asking the Post Office to
5 address the corporation, into any mention in
6 a witness statement, get revealed to you at the
7 time?

8 **A.** No, I don't think so. I understand, though,
9 that Mr Jenkins did actually put in a witness
10 statement, I'm pretty sure, in the *Misra* case.

11 **Q.** He did and, before he did -- and I'm not going
12 to take you through it all in the light of your
13 answers -- he said that he was unhappy or
14 unwilling to answer directly question 3?

15 **A.** Without the data.

16 **Q.** No. He was unhappy or unwilling to answer
17 directly question 3.

18 **A.** I have to say that I'm surprised at that.
19 I thought he'd said that there was none.

20 **Q.** This kind of exchange of information, would you
21 expect it to be disclosed in criminal
22 proceedings?

23 **A.** If he's saying he can't give an answer to that,
24 and he's working in Fujitsu, definitely.

25 **Q.** You were responsible, in the sense of being

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1 accountable for the work of your lawyers in the
 2 Criminal Law Team?
 3 **A.** Absolutely.
 4 **Q.** But were you also not responsible because others
 5 sought your guidance on how to approach issues
 6 of Horizon integrity as we've seen in the emails
 7 of this morning?
 8 **A.** Yes, and is this about me endeavouring to help
 9 them?
 10 **Q.** Yes.
 11 **A.** Yes.
 12 **Q.** To what extent was the Post Office's strategy,
 13 in the prosecution of Mrs Misra, informed in
 14 your understanding by an objective of deterring
 15 other subpostmasters from raising concerns about
 16 Horizon?
 17 **A.** That should not have been a concern at all.
 18 **Q.** I know it should not have been: to what extent
 19 was it?
 20 **A.** I don't believe it was.
 21 **Q.** You've read, I think, what the Court of Appeal
 22 said about the Seema Misra case in the *Hamilton*
 23 series of appeals?
 24 **A.** Yes.
 25 **Q.** In the light of that, do you agree, on

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1 **Q.** You tell us in your witness statement, it's
 2 paragraph 15.4, that you do not know, one way or
 3 the other, whether anyone gave Mr Jenkins any
 4 explanation as to the duties of an expert
 5 witness in the Seema Misra case?
 6 **A.** No, I mean, I assume that Mr Tatford would have
 7 taken him through that during the course of the
 8 trial.
 9 **Q.** You say that in paragraph 15.4 --
 10 **A.** Yes.
 11 **Q.** -- where you're addressing the question of
 12 whether you or anyone else explained the duties
 13 of an expert to Mr Jenkins, and you say that you
 14 believe Mr Jenkins would have been questioned in
 15 court --
 16 **A.** Yes.
 17 **Q.** -- about his qualifications, experience, and the
 18 basis for his opinions?
 19 **A.** Yes.
 20 **Q.** Are you by that suggesting that whether
 21 a prosecution witness was being called as
 22 an expert and whether their evidence was
 23 admissible as expert evidence was a matter to be
 24 determined by the court at trial?
 25 **A.** No, I don't think I'm saying that. What I'm

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1 reflection, that the Post Office and the
 2 Criminal Law Team did not fulfil its duties
 3 under either the Code for Crown Prosecutors to
 4 evaluate the evidence in support of the relevant
 5 charges nor discharge its disclosure obligations
 6 under the CPIA?
 7 **A.** I wouldn't seek to argue with the Court of
 8 Appeal.
 9 **Q.** You confirm in your witness statement, in
 10 relation to obtaining expert evidence, that,
 11 firstly, you gave no instructions to Mr Jenkins
 12 in the course of the Seema Misra case.
 13 **A.** I can't remember giving any instructions to
 14 Mr Jenkins in any case.
 15 **Q.** That's paragraph 15.3 of your witness statement.
 16 **A.** Yes.
 17 **Q.** You confirm that you do not know whether
 18 Mr Singh or anyone else in the Criminal Law Team
 19 gave Mr Jenkins such instructions in the *Misra*
 20 case?
 21 **A.** I mean when you say "instructions", you mean
 22 directions to do something?
 23 **Q.** Yes.
 24 **A.** I can't remember directing any witness to do any
 25 particular thing.

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1 saying is that him -- counsel would have
 2 questioned Mr Jenkins, so it was clear to the
 3 court that he understood that his duty was to
 4 the court and not to those of us who were
 5 instructing him.
 6 **Q.** That may be so and that may be a necessary part
 7 of adducing expert evidence in court. We're
 8 interested in the antecedents stage, ie what
 9 happened before. Are you suggesting that
 10 because, when it got to court, counsel may ask
 11 questions about qualifications, experience and
 12 basis of opinions, there was no necessity to do
 13 any of that beforehand?
 14 **A.** No, we clearly got it wrong with how we
 15 instructed Mr Jenkins in terms of his expertise,
 16 and I remember you going through a very long
 17 list with me on the first day of my evidence,
 18 and I believe I accepted that what you were
 19 saying was right and that we were wrong -- or
 20 I was wrong.
 21 **Q.** I was just checking that what you now say in
 22 paragraph 15.4 of your second witness statement
 23 is not a gloss on that, ie because
 24 qualifications, experience and basis of opinions
 25 are addressed at court, there's no need to do it

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1 beforehand?

2 **A.** No, I'm not saying that at all. I'm accepting
3 what you said to me on the first occasion that
4 I gave evidence and I'm not trying to gloss it.

5 **Q.** Thank you.

6 **A.** I'm not excusing myself.

7 **Q.** Thank you very much, Mr Wilson.

8 Can we turn to what happened after the
9 trial, then, and look at POL00093686. Look at
10 page 5, please, foot of the page. This is sent
11 by Jarnail Singh's secretary. If you just see
12 in the top right there it says, his secretary
13 "on behalf of Jarnail Singh", sent on 21 October
14 2010 to Mandy Talbot and others, not including
15 you.

16 **A.** No, I'm included.

17 **Q.** Are you?

18 **A.** Yeah, third line down.

19 **Q.** Oh, I'm so sorry. Yes, I completely missed you.
20 Looking at the content, Mr Singh says:
21 "After a lengthy trial at Guildford the
22 above named was found guilty of theft. The case
23 turned from a relatively straightforward general
24 deficiency case into an unprecedented attack on
25 the Horizon system. We were beset with

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1 I understand the trial concluded --

2 **Q.** Yes.

3 **A.** -- and at --

4 **Q.** It's the afternoon of the trial.

5 **A.** -- 14.58. I know from looking at my diaries on
6 that particular date I wasn't in the office,
7 certainly in the morning. I was in an East
8 London Mail Centre and I don't know how long
9 I stayed in the East London Mail Centre but what
10 I do recall is when I saw this email I was quite
11 surprised, not only about the people that it had
12 gone to, some of whom I have no idea who they
13 are, but also about the content, because this is
14 not a report that I would have prepared or any
15 other lawyer would have prepared, and you can
16 see that on the *Henderson* case, where I do the
17 report on the *Henderson*. That's how --

18 **Q.** It's just the facts?

19 **A.** Yeah, absolutely.

20 **Q.** The second thing that Mr Singh told us was that
21 the title of the email, "Seema Misra --
22 Guildford Crown Court -- Trial -- Attack on
23 Horizon" was dictated to him, perhaps by you; is
24 that correct?

25 **A.** No.

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1 an unparalleled degree of disclosure requests by
2 the defence. Through hard work of everyone,
3 counsel Warwick Tatford, Investigation Officer
4 Jon Longman, and through the considerable
5 expertise of Gareth Jenkins of Fujitsu we were
6 able to destroy to the criminal standard of
7 proof (beyond all reasonable doubt) every single
8 suggestion made by the Defence.

9 "It is to be hoped that the case will set
10 a marker to dissuade other defendants from
11 jumping on the Horizon bashing bandwagon."
12 "Jarnail Singh."

13 The subject of the email is called "Attack
14 on Horizon"; can you see that?

15 **A.** Yes.

16 **Q.** When he gave evidence, Mr Singh said that you or
17 Mandy Talbot selected this distribution list for
18 him and told him who to send it to; is that
19 correct?

20 **A.** I certainly didn't.

21 **Q.** Would it be usual for Mandy Talbot, in Civil
22 Litigation, to tell Jarnail Singh, the case
23 holder in Criminal Litigation, who to send
24 an email to?

25 **A.** No. His email is on the same day as

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1 **Q.** The third thing he told us was that he typed
2 these words or more accurately asked his
3 secretary to type these words, including "Attack
4 on Horizon", even though he personally did not
5 believe that the Seema Misra case involved
6 an attack on Horizon. Did he ever express such
7 sentiments to you: "I've been forced to write
8 an email, the title to which and the contents
9 with which, I disagree"?

10 **A.** No.

11 **Q.** He said, fourthly, that a collection of people
12 dictated the contents to him, perhaps involving
13 counsel, perhaps involving you, perhaps
14 involving other lawyers, but then you saw
15 a draft of the email and you approved the final
16 draft, which is his then-secretary sent out; is
17 that true?

18 **A.** No.

19 **Q.** Did you draft any part of this email?

20 **A.** No, I did not.

21 **Q.** Did you authorise the sending of this email in
22 any way?

23 **A.** No.

24 **Q.** Did you share the view expressed by Mr Singh
25 that the Horizon integrity issue was a passing

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1 bandwagon upon which people could jump?
 2 **A.** No.
 3 **Q.** Can we turn to POL00169170. So we can see what
 4 happened to Jarnail Singh's email, if we scroll
 5 down, please. We can see just the email there
 6 at the foot of the page and then, somehow, in
 7 this version of it -- we can't see how it got
 8 there, but somehow -- it's got from the
 9 distribution list at the bottom of the page on
 10 to David Y Smith, Rod Ismay, who was on the
 11 distribution list, Mike Moores, Mike Young and
 12 Paula Vennells, yes?
 13 **A.** Yes.
 14 **Q.** David Smith, he was the Managing Director of the
 15 company at the time; is that right?
 16 **A.** I don't know.
 17 **Q.** David Y Smith?
 18 **A.** I don't know.
 19 **Q.** Paula Vennells was Head of Network, Post Office
 20 Network?
 21 **A.** I recognise Paula Vennells' name because I think
 22 she became the Chief Executive of --
 23 **Q.** Subsequently. At this time, I think she was
 24 Head of Network?
 25 **A.** Right.

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1 people, like Susan Crichton, the General
 2 Counsel. Do you see any pattern emerging
 3 between the emails?
 4 **A.** Yes.
 5 **Q.** Both followed trials which had challenged the
 6 integrity of Horizon, yes?
 7 **A.** Yes.
 8 **Q.** Both were gleeful that the challenge was
 9 defeated?
 10 **A.** Yes.
 11 **Q.** Both victories were seen as a way of sending
 12 a message out to the subpostmaster community?
 13 **A.** Yes.
 14 **Q.** Both were evidently of interest and importance
 15 to senior people within the Post Office, weren't
 16 they?
 17 **A.** Yes.
 18 **Q.** You say in your statement that you cannot recall
 19 what you thought at the time about the outcome
 20 of the case but you were surprised at the
 21 audience?
 22 **A.** Yes.
 23 **Q.** Why were you surprised at the audience?
 24 **A.** I didn't realise that it was being watched,
 25 effectively, by pretty senior people within Post

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1 **Q.** Then if we go on further up the page, please, we
 2 can then see Mr Ismay redistributes the email
 3 back to everyone who was on the first list --
 4 can you see that --
 5 **A.** Yes.
 6 **Q.** -- including you?
 7 **A.** Yes.
 8 **Q.** "Dear all -- please note Dave Smith's thanks to
 9 you all for your important work on this case.
 10 "Dave and the [Executive Team] have been
 11 aware of the significance of these challenges
 12 and have been supportive of the excellent work
 13 going on in so many teams to justify the
 14 confidence we have in Horizon and in supporting
 15 our processes.
 16 "This is an excellent result and a big
 17 thanks to everyone."
 18 So Rod Ismay here is making sure that
 19 everyone saw how pleased David Smith was with
 20 the outcome, yes?
 21 **A.** Yes.
 22 **Q.** This circulation list includes some of the same
 23 people that we saw in the congratulatory email
 24 after the *Castleton* trial, including you, Mandy
 25 Talbot and Rod Ismay, as well as a successor

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1 Office Limited.
 2 **Q.** How has that come about, as Head of Criminal
 3 Law, surely you should have been aware that the
 4 Managing Director, David Y Smith, and the
 5 Executive Team were aware of the significance of
 6 the challenges that the *Misra* case presented?
 7 **A.** Well, I wasn't aware. They weren't contacting
 8 me; I wasn't contacting them. Mr Singh wasn't
 9 telling me that lots of people were interested
 10 in it.
 11 **Q.** As far as you were aware, was it just another
 12 run-of-the-mill case, then?
 13 **A.** Well, it certainly was when I allocated it to
 14 Jarnail but, in terms of disclosure, it took on
 15 a life on its own but, I mean, I didn't view it,
 16 at any particular stage, as a test case, which
 17 clearly other people were viewing it as. For
 18 me, it was another case with a lot of
 19 disclosure.
 20 **Q.** Given the defence that Mrs Misra was running, in
 21 short that Horizon had created fictitious
 22 shortfalls in her accounts --
 23 **A.** Yes.
 24 **Q.** -- if she had been acquitted, do you think that
 25 would have opened up the strong possibility of

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1 attacks on past convictions secured on the back
2 of Horizon evidence?

3 **A.** I think, looking back now, I think that probably
4 you're right. I think, having seen the amount
5 of disclosure and then being told by a jury
6 "We're not going to convict", would have been
7 a defining moment, yes.

8 **Q.** It may have called a halt to Horizon
9 prosecutions?

10 **A.** It may have done, yes.

11 **Q.** Would you agree that, although your department
12 would have been in the vanguard of driving that
13 process of looking back at past convictions and
14 halting current prosecutions, the implications
15 would have been felt across the entire Post
16 Office estate, ie they would have had effects
17 not just on prosecutions?

18 **A.** Inevitably, yes.

19 **Q.** Can you therefore now understand the relief
20 that's expressed in these emails that she was
21 convicted?

22 **A.** I saw the -- well, from the senior people?

23 **Q.** Yes.

24 **A.** Not from Jarnail Singh?

25 **Q.** Well, from both, actually.

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1 sent to you, after your email about not setting
2 up an independent expert evaluation of the
3 integrity of Horizon, after your sight of the
4 Ismay report, you can't have been in any doubt
5 that the business was interested in cases which
6 challenged the integrity of Horizon, can you?

7 **A.** Well, I wouldn't have been in any doubt seeing
8 this that the business was interested in the --
9 the result of cases.

10 **Q.** Well, therefore, you can't have been surprised
11 at the audience of this "bandwagon" email?

12 **A.** Well, it was a surprise.

13 **Q.** But why? If --

14 **A.** Because I didn't --

15 **Q.** If, after all of the events which had happened,
16 the last round, the big challenge, was Lee
17 Castleton, after the proposal to get an expert
18 evaluation of the integrity of Horizon, which
19 you, on balance, argued against, after the
20 disclosure issues that we've looked at, after
21 the Ismay report, you knew what was riding on
22 this case, didn't you, and, therefore, how
23 everyone would be interested in its outcome?

24 **A.** I really don't see that as being in my brain,
25 no. I think I was quite surprised. I mean, the

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1 **A.** Well, I saw Jarnail Singh as being relieved on
2 the basis that it was probably a stressful
3 period for him and that lent towards the
4 language that he's actually used. So when I saw
5 the first email, whilst I was surprised, I put
6 it down to stress because I think, had I not --
7 or believed that that was the position, I think
8 I'd have had a word with him about his use of
9 the language because it was inappropriate.

10 With the senior people here, yes, I mean
11 I probably wouldn't have seen a congratulatory
12 email like this at all if the case had been --
13 if Ms Seema Misra had been acquitted.

14 **Q.** You were on the distribution list, as you
15 rightly pointed out, of the original email --

16 **A.** Yes.

17 **Q.** -- and of this reply, after its done the rounds
18 amongst senior people within the Post Office.
19 You didn't pull Mr Singh up on it, did you?

20 **A.** No, as I say -- I said just now, I thought his
21 reply was probably generated by a relief --
22 relieving his stress.

23 **Q.** Or is the truth that you were also personally
24 invested in the outcome of Seema Misra's case?
25 After the Lee Castleton congratulatory email

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1 Lee Castleton thing I had virtually nothing to
2 deal with, because all I did was say, "Yes, I'll
3 come to court and explain why Mr Singh was
4 acquitted". The Rod Ismay report, I had very
5 little to do with that. I think I may have
6 given some information about cases that we'd
7 been -- prosecuted but I had very little to do
8 with that and was quite surprised, because I'd
9 forgotten about the pending report, when it came
10 through.

11 And, yeah, these things were happening over
12 an extended period of time and they weren't
13 always in the front of my memory. I'm not
14 trying to make an excuse. Maybe I should have
15 been aware that there was a big interest in this
16 but all I can remember about the final email
17 here was being surprised at the number of people
18 that clearly had been interested in it and that
19 I was unaware of.

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

21 We've looked at a series of emails of what
22 happens when the Post Office is successful in
23 civil proceedings or criminal proceedings. Can
24 we look at what happens when the opposite comes
25 about.

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1 Anthony Utting, Tony Utting, gave evidence
2 on 17 November this year and he told us that,
3 when the Post Office lost the case, there would
4 be a report, which was written by counsel, that
5 would go to the Criminal Law Team and the
6 leadership team about why it had been lost; is
7 that correct?

8 **A.** Certainly, if we lost a case, I would ask
9 counsel for a report on the case, giving a view
10 as to why he believed or she believed that we'd
11 lost it, yeah.

12 **Q.** What would you do with that report?

13 **A.** Well, that would be forwarded up to my line
14 manager, whether it was Andrew Wilson or Tony
15 Utting, or whoever.

16 **Q.** What was the purpose of doing that?

17 **A.** Well, the purpose was, if there was a problem
18 identified by counsel, we would try and rectify
19 it or understand what went wrong and provide
20 training, or whatever was needed.

21 **Q.** In January 2007, Mrs Susan Palmer, after
22 a three-day trial in which she had raised
23 Horizon integrity issues, was acquitted of three
24 charges of false accounting with the jury
25 acquitting her after about ten minutes. The

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1 by the Post Office?

2 **A.** Well, it could be that it wasn't by email.

3 I mean, counsel may have --

4 **Q.** Okay, reports or any document or piece of paper.

5 **A.** I have no idea how the Post Office disclosed all
6 these documents on you. But I did ask for -- on
7 every case that we lost, I asked for a report
8 from our counsel who is dealing with it and, if
9 it was an agent's case, I'd also ask for
10 an agent to give me a report. So I will have
11 got a report. I'm pretty confident about that.
12 I don't recall it, though.

13 **MR BEER:** Thank you very much, Mr Wilson.

14 Sir, I wonder if we might take the afternoon
15 break now until 3.20.

16 **SIR WYN WILLIAMS:** Yes, very well.

17 **MR BEER:** Thank you, sir.

18 (3.04 pm)

(A short break)

20 (3.20 pm)

21 **MR BEER:** Good afternoon, sir, can you see and hear
22 us?

23 **SIR WYN WILLIAMS:** Yes, Thanks, yes.

24 **MR BEER:** Thank you.

25 Good afternoon, Mr Wilson.

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1 jury asked the question, "What was Mrs Palmer
2 supposed to do if she did not agree with the
3 figures that the Horizon system produced?" The
4 Post Office representatives at court were unable
5 to answer that question.

6 Was there a post-trial report in that case?

7 **A.** There will have been. I can't remember.

8 **Q.** The jury raised in public a question as to the
9 reliability of the Horizon system and what
10 a subpostmaster was supposed to do if, in that
11 case, she did not agree with the figures, and
12 the Post Office was unable to answer it at
13 court. Was any review undertaken in the light
14 of this outcome?

15 **A.** I don't recall the case at all. I imagine there
16 should have been a review. I imagine there
17 would have been a review. But it seems to me
18 extraordinary that they don't know that she
19 could have reported that to -- I can't remember
20 the initials of the group that dealt with
21 problems. Yeah, I'm surprised at that.

22 **Q.** We haven't got a review or a report back to you.
23 The only emails we've got are gloating emails
24 when the Post Office wins. Do you know why that
25 is? We've got no reviews of when cases are lost

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1 Can we turn -- in fact, before we turn to
2 that, Ms Gallafent has kindly pointed out to me
3 that POL00049716 -- needn't be displayed --
4 shows that David Pardoe was the person who
5 authorised the prosecution of Seema Misra.
6 Thank you.

7 Can we turn, please, to Allison Henderson.
8 You were the relevant lawyer in Mrs Henderson's
9 case, yes?

10 **A.** Yes.

11 **Q.** Can we look, please, at POL00044501. Can we
12 scroll to the foot of the page, please. This
13 is, is this right, a memorandum from the
14 Investigator to you --

15 **A.** Yes.

16 **Q.** -- dated 20 April 2010?

17 **A.** Yes.

18 **Q.** Then if we scroll up, please. Is this,
19 essentially, a memorandum seeking your advice on
20 charges? Just take a moment to read it to
21 yourself.

22 **A.** It's not the traditional report that I'd expect
23 to see.

24 **Q.** Have I picked the story up sort of halfway
25 through? If you look just towards the bottom of

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1 the page where it's being displayed there, where
2 it says, "I hope ... we can continue with
3 charge(s) of theft and false accounting".

4 **A.** Yes, I think so. The normal report is slightly
5 different to that.

6 **Q.** Yes. You tell us in your witness statement --
7 I wonder whether we can turn it to up, then,
8 please, page 21 of your witness statement. At
9 paragraph 33, you refer to some documents
10 earlier in your statement, and you say:

11 "I believe, after having reviewed the
12 documents, that the first time I became aware
13 that the integrity of Horizon data was being
14 questioned was upon receipt of the amended
15 defence statement dated 16 November 2010 ...
16 I received an indication that Mrs Henderson was
17 highly likely to plead to false accounting. The
18 receipt of the challenge complaining of the
19 malfunction of Horizon would have raised
20 an obligation to serve on the defence any
21 material that assisted the defence or undermined
22 the prosecution."

23 Then you say this:

24 "I do not believe that ARQ data was ever
25 sought in this case."

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1 wonder whether you might accept a plea to false
2 accounting in this matter as well as full
3 repayment of the [£12,000-odd] outstanding."

4 To what extent was repayment of alleged
5 losses ever made a condition of acceptance by
6 the Post Office of a plea?

7 **A.** To say I wasn't interested in repayment is
8 underplaying the statement but that was not
9 a primary concern of mine, and I don't believe
10 I made it a condition with Belmores. I think
11 they were offering this.

12 **Q.** Can we just look at what the defence statement
13 said, POL00044503.

14 Defendant doesn't dispute that £12,000-odd
15 appears to be missing ...

16 "[She] offers no particular explanation and
17 does not understand why there is a discrepancy,
18 however does believe that any discrepancies are
19 the result of a malfunction of the Horizon
20 computerised accounting system. [She] believes
21 that any discrepancy could have been discovered
22 by the Post Office auditor, particularly as he
23 initially alleged £18,000 was missing, this was
24 reduced to the alleged sum in a matter of
25 minutes. Further investigation by the auditor

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1 That certainly matches the material that we
2 have got.

3 If, as you said the outset of today, that
4 ARQ data was fundamental in at least those cases
5 where Horizon data was being questioned or the
6 integrity of Horizon was being questioned, why
7 wasn't ARQ data sought in this case?

8 **A.** Well, I think it will have been sought had she
9 maintained her not guilty plea but I think the
10 defence statement of 16 November, crossed with
11 a telephone call of either the same date or the
12 date before, with the defence solicitors, who'd
13 telephoned me to say that it was in counsel's
14 hands, but it was likely to be a guilty plea.
15 And then five or seven days later, counsel had
16 had -- counsel to counsel had had a telephone
17 call where the defence said that she would be
18 pleading to -- she would plead to false
19 accounting and would not be challenging Horizon.

20 Had she maintained a not guilty plea, we
21 would have been looking at ARQ data, ARQ data.

22 **Q.** Can we look, please, at that train of events,
23 POL00055807, a letter of 18 November from
24 defence solicitors Belmores to you. Question:

25 "We act on behalf of the above named and

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1 would have discovered the whereabouts of the
2 missing sum.

3 "She categorically denies appropriating any
4 money from [the Post Office].

5 "... not in any financial difficulty ... of
6 good character and has not moved any monies or
7 made significant purchases.

8 "[She] accepts that she is contractually
9 obliged to pay the amount of £12,000-odd to the
10 Post Office and has instructed her solicitors to
11 approach prosecution as to how best this can be
12 [achieved]."

13 Can we see what your response was to the
14 defence statement, POL00055783. At the top of
15 the page, 17 November:

16 "Have received a defence statement today,
17 despite the telephone conversation [today].

18 A hard copy has been put in the post today.

19 "... the defence allege that any discrepancy
20 was as a result of the Horizon system."

21 Then last paragraph:

22 "Clearly if there were to be a plea to false
23 accounting but on the basis that the Horizon
24 system was at fault that would not be

25 an acceptable basis of plea for the

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1 prosecution."

2 Can we look, please, at POL00046865. Look
3 at page 7, please. This is Allison Henderson's
4 questionnaire as part of the Complaint Review
5 and Mediation Scheme. Can you see at
6 paragraph 6, the second bit of it:

7 "She [that's Mrs Henderson] was advised to
8 plead guilty to false accounting in return for
9 dropping the theft charge. She was also told
10 that she could not mention any problems with
11 Horizon in court."

12 Can you see that?

13 **A.** Yes.

14 **Q.** I think you know that the Court of Appeal, in
15 its *Hamilton* judgment, insofar as it concerns
16 Allison Henderson, noted that the Post Office
17 conceded that it was improper to make the
18 acceptability of Mrs Henderson's plea to false
19 accounting conditional upon making no issue of
20 the Horizon system. The Court of Appeal
21 continued:

22 "In our judgment, such conduct on the part
23 of a prosecutor is improper. The Post Office
24 had dropped the theft charge and so could no
25 longer advance any case that she had stolen the

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1 the basis of plea to false accounting
2 conditional on making no issue of the Horizon
3 system?

4 **A.** Yes. I think what I've done is wrongly worded
5 it. What I should have said was that, in the
6 event that we have a disagreement about
7 culpability, then it'll probably have to be
8 dealt with as a Newton hearing, or words to that
9 effect. Yes, I've put it in the wrong way.
10 I accept that.

11 **Q.** In Mrs Henderson's case, did you disclose the
12 receipts and payments mismatch bug
13 documentation?

14 **A.** No.

15 **Q.** Did you disclose the Rod Ismay report?

16 **A.** No.

17 **Q.** Why was that?

18 **A.** The Rod Ismay report, as far as I was concerned,
19 was a vindication of the Horizon system and
20 I didn't see that as undermining our case.

21 **Q.** Did you expressly consider it?

22 **A.** Did I expressly consider --

23 **Q.** It for disclosure?

24 **A.** No, basically because I felt that it didn't
25 undermine our cases.

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1 money. The Post Office concedes that that
2 should have left the way open to Mrs Henderson
3 to suggest that there was no actual loss and she
4 had only covered up a shortfall that Horizon had
5 created."

6 Do you accept, as you did before, what the
7 Court of Appeal says?

8 **A.** I wouldn't seek to argue with the Court of
9 Appeal at all, in any shape or form, but my --
10 the reason I was putting that in there was in
11 the event that she did plead guilty to the false
12 accounting, then I refer back to what I put in
13 my witness statement a number of times
14 concerning the agreement. If there wasn't
15 an agreement between the prosecution and the
16 defence, in terms of the difficulties -- I'm
17 phrasing this really badly -- the difficulty in
18 the case, then you'd effectively have a Newton
19 hearing.

20 I mean, that was what I was trying to do but
21 I accept that I put it in a very different and
22 difficult way in that document that you've just
23 shown me, yes.

24 **Q.** With hindsight, to you accept that it wasn't
25 proper to make the acceptability of the plea or

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1 **Q.** When Mrs Henderson lodged her defence case
2 statement or her defence statement, did that not
3 trigger an obligation to review what material
4 existed within the Post Office generally,
5 without going to Fujitsu in the first instance?

6 **A.** Yes, it would have triggered disclosure, yes.

7 **Q.** Is it right that there wasn't a central
8 repository, whether physical or on a server, for
9 investigators and prosecutors to access, of all
10 information relating to alleged or established
11 problems with Horizon?

12 **A.** Yes, it's right. I know it was suggested by
13 counsel in an earlier case, who represented the
14 subpostmasters and mistresses, a large number of
15 them, and I think it was an opportunity we
16 missed.

17 **Q.** Was active consideration ever given to that, to
18 have a central repository at which established
19 problems with Horizon, some of which we've seen
20 today, or alleged problems with Horizon, could
21 be accessed?

22 **A.** Not that I recall, but as I say, I think it was
23 an opportunity missed that we should have done
24 something like that, yes.

25 **Q.** Who within the Post Office was responsible for

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1 thinking of such an idea and carrying such
 2 an idea into action?
 3 **A.** Well, I could have done and I should have done,
 4 but I don't think it ever occurred to me and
 5 I don't think anybody ever suggested it as
 6 a good idea.
 7 **Q.** Can we turn, lastly, to Khayyam Ishaq's case and
 8 turn up paragraph 50 to 53 of your witness
 9 statement which is on page 27. You say:
 10 "I did not have a role in relation to
 11 disclosure."
 12 You weren't aware that Mr Ishaq had raised
 13 Horizon integrity issues in the course of the
 14 prosecution and you had no involvement in the
 15 prosecution after you moved to the Royal Mail
 16 Group in 2012; is that right?
 17 **A.** Yes.
 18 **Q.** Who took over responsibility from you when you
 19 moved in 2012?
 20 **A.** Mr Singh would have been the lawyer in Post
 21 Office Limited.
 22 **Q.** But you had overall responsibility for the case
 23 until April 2020; is that right?
 24 **A.** Yes.
 25 **Q.** You, a year earlier, had authorised prosecution,
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1 **A.** Well, that's showing me -- as me, isn't it?
 2 **Q.** Did you ever analyse or reduce to writing such
 3 analysis of why there was a realistic prospect
 4 of conviction?
 5 **A.** No. I don't think so.
 6 **Q.** Your advices tend to follow this format, namely
 7 a statement as to there is a realistic prospect
 8 of conviction and then the rest of the memo
 9 turns to evidential queries that need bottoming
 10 out?
 11 **A.** Yes.
 12 **Q.** You don't say why there is a realistic prospect
 13 of conviction?
 14 **A.** No, no. I don't.
 15 **Q.** Was there a separate record kept of why there
 16 was a realistic prospect of conviction?
 17 **A.** I don't think so, no.
 18 **Q.** After April 2012, did you have any involvement
 19 in the proceedings against Mr Ishaq?
 20 **A.** No.
 21 **MR BEER:** Thank you very much, Mr Wilson. Those are
 22 the only questions I ask. That document can be
 23 taken down, please.
 24 I think there are some questions, including
 25 from Mr Jacobs, to start with.
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1 is that right, advising there was sufficient
 2 evidence of a realistic prospect of conviction?
 3 **A.** Yes.
 4 **Q.** I'll give the --
 5 **A.** Oh, no, I -- did I?
 6 **Q.** Well, let's have a look at it. POL00056596.
 7 **A.** I thought Cartwright King gave the --
 8 **Q.** Can you see this is a memorandum dated 5 July
 9 2011 --
 10 **A.** Yes.
 11 **Q.** -- in the case of Khayyam Ishaq. If we go to
 12 the last page, if we scroll down, we can see
 13 it's written by you.
 14 **A.** Oh, right, yes. I was under the impression that
 15 I hadn't started the case.
 16 **Q.** If we go back to the first page, please.
 17 "In my opinion [paragraph 1] the evidence is
 18 sufficient to afford a realistic prospect of
 19 conviction ... on the charges set out on the
 20 attached Schedule."
 21 **A.** In that case, there is a mistake, then, in my
 22 witness statement because I put at answer
 23 number 47 the charge was drafted by Martin Smith
 24 of Messrs Cartwright King.
 25 **Q.** Whereas, in fact, it's you?
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1 **Questioned by MR JACOBS**
 2 **MR JACOBS:** I just have a quick question to ask you.
 3 I act for 156 subpostmasters and mistresses who
 4 were affected by this scandal.
 5 I want you to cast your mind back but not
 6 very long, just to 9.15 this morning when
 7 Mr Beer asked you a question and he said:
 8 "If you were asked from 2000 onwards, and if
 9 there was any change in the answer from 2000
 10 until, say 2012, who at board level was
 11 responsible for the conduct of criminal
 12 prosecutions, what would your answer have been?"
 13 **A.** Yes.
 14 **Q.** Do you recall that question?
 15 **A.** Yes, I do, yes.
 16 **Q.** So I'll remind you of your answer so we've got
 17 it on the transcript.
 18 **A.** I think I said the Secretary, didn't I?
 19 **Q.** You said the answer would be the Company
 20 Secretary. Then you went on to say:
 21 "Yes, I think there were probably two,
 22 possibly even three while I was there and, for
 23 the life of me, at the moment, I can't remember
 24 their names."
 25 **A.** Yes.
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- 1 **Q.** Now, Howe+Co have been quite diligent and we've
 2 found Bond documents, the names of the Company
 3 Secretaries in Post Office Limited who were in
 4 place from the years when you were in place,
 5 2000 to 2012. Our clients are very interested
 6 to know the names of the individuals who would
 7 have known, or ought properly to have known,
 8 what was going on with the Horizon system and
 9 the --
- 10 **A.** The reason I said that I think it was the
 11 Secretary, it was because I know that my direct
 12 line, the Security Director, reported to the
 13 Secretary.
- 14 **Q.** All right. Right.
- 15 **A.** So that was my rationale.
- 16 **Q.** Yes. So your evidence is still, then, that your
 17 understanding is that the person at board level
 18 who was responsible for the conduct of criminal
 19 prosecutions was the Secretary?
- 20 **A.** Yes.
- 21 **Q.** It might help remind you of the names, if I give
 22 you those names, and you can confirm whether
 23 that's right. So from 1999 to 2010, the Company
 24 Secretary was Jonathan Evans.
- 25 **A.** Right.

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- 1 **MR JACOBS:** Okay. Well, I am just going to ask to
 2 see if I have any more questions.
- 3 I don't, thank you very much.
- 4 **MR BEER:** I think Mr Henry has some questions.
- 5 **Questioned by MR HENRY**
- 6 **MR HENRY:** Thank you, sir, Mr Wilson. I represent,
 7 among other people, Seema Misra.
- 8 I suggest your evidence today has revealed
 9 that the Criminal Law Team was the submissive
 10 servant of the Post Office's commercial
 11 interests or perceived reputational advantage.
 12 Do you agree with that?
- 13 **A.** No, I don't.
- 14 **Q.** That your department's duties as a private
 15 prosecutor were twisted, degraded or suborned in
 16 the service of the Post Office's interests as
 17 a business; do you disagree?
- 18 **A.** Yes, I do.
- 19 **Q.** That prosecutorial standards and duties were
 20 subordinated routinely to ruthless commercial
 21 imperatives; that's right, isn't it?
- 22 **A.** No.
- 23 **Q.** And that far from displaying candour and
 24 disclosing information concerning system errors
 25 to subpostmasters and criminal and civil courts,

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- 1 **Q.** Does that ring a bell?
- 2 **A.** Yes.
- 3 **Q.** Is that right?
- 4 **A.** Yes.
- 5 **Q.** He was one of the three?
- 6 **A.** Yes.
- 7 **Q.** Then from 2010 to 2011, for a period of about
 8 18 months, it was Susan Crichton, who also held
 9 the role of General Counsel; do you recall that?
- 10 **A.** She was General Counsel?
- 11 **Q.** She was also, it seems, the Company Secretary as
 12 well.
- 13 **A.** Right. Okay, I didn't understand that.
 14 I didn't know that.
- 15 **Q.** Okay. So she wasn't one of the three that
 16 you -- the two or three, that you --
- 17 **A.** No, she wasn't one of the three I was thinking
 18 about.
- 19 **Q.** The third one, from July 2011 to 2017, and we
 20 know that you went to Royal Mail in 2012, is
 21 Alwen Lyons, is he one of --
- 22 **A.** I've never heard the name.
- 23 **Q.** So you can definitely confirm, from what we've
 24 now been through, Jonathan Evans?
- 25 **A.** Yes.

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- 1 your department sought to suppress such
 2 information?
- 3 **A.** No.
- 4 **Q.** You have said, in respect of the documents that
 5 you received on the 8 October 2010 -- and we'll
 6 come to one of them very briefly in a moment --
 7 that, without wishing to be facetious, you said
 8 that you must have had a bad day at the office
 9 when you decided that the contents of those
 10 documents, concerning the receipts and payments
 11 mismatch bug were not disclosable; do you
 12 remember saying that?
- 13 **A.** Yes.
- 14 **Q.** I suggest that it was not an isolated error and
 15 that this was part of -- whether it was reckless
 16 or Nelsonian -- a policy of taking perverse
 17 decisions on disclosure to protect the Horizon
 18 system; what do you say about that?
- 19 **A.** No, I didn't take decisions to protect Horizon.
- 20 **Q.** Could we go, please, to FUJ -- there is
 21 an equivalent POL document but if we could go to
 22 FUJ00081584, please. Now, the people in this
 23 document, some of them were known to you, were
 24 they not, apart from Mr Simpson?
- 25 **A.** The only name I recognise there, apart from Alan

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1 Simpson, is Gareth Jenkins.
 2 **Q.** Not Mr Winn of POL Finance?
 3 **A.** No.
 4 **Q.** Not Julia Marwood, who was an Investigator and
 5 part of Network?
 6 **A.** No.
 7 **Q.** Not Emma Langfield, who was part of the Post
 8 Office's Problem Management Team?
 9 **A.** No.
 10 **Q.** None of those?
 11 **A.** No.
 12 **Q.** You read that document presumably on the
 13 afternoon of the 8 October?
 14 **A.** Was I copied into an email with it?
 15 **Q.** It was sent to you by Mr Simpson.
 16 **A.** Oh, right. This is the -- right, okay, yes.
 17 **Q.** Yes. Can we go, please, to the impact section,
 18 please. This is all predicated on the effect of
 19 the receipts and payments mismatch bug. Very,
 20 very quickly, because learned Counsel to the
 21 Inquiry has all ready gone through it:
 22 "The branch has appeared to have balanced,
 23 whereas in fact they could have a loss or
 24 a gain.
 25 "Our accounting systems will be out of sync
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1 drawing that to his attention?
 2 **A.** I don't know.
 3 **Q.** Do you accept that this document, in which
 4 a number of people from the Post Office,
 5 together with a number of people from Fujitsu,
 6 were present, reveals a fear that, if flaws in
 7 Horizon became widely known, that subpostmasters
 8 might exploit this?
 9 **A.** That's what it's saying.
 10 **Q.** Yes.
 11 **A.** I'm not saying I agree with it though.
 12 **Q.** But you see and you accept, that that is what it
 13 says?
 14 **A.** Yes, I can't dispute what it says.
 15 **Q.** Right, and that, therefore, the mindset might be
 16 that it would provide branches ammunition to
 17 blame Horizon for future discrepancies, in other
 18 words people could take dishonest advantage of
 19 it; that must be the import of what that is
 20 saying?
 21 **A.** Yes.
 22 **Q.** Right. What I suggest is that you became aware
 23 of that document, you forward it to Mr Singh,
 24 you forward it to Ms McFarlane but the
 25 vulnerabilities were suppressed, weren't they?
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1 with what is recorded at the branch."
 2 Then emphasis, please, with the following
 3 words:
 4 "If widely known could cause loose of
 5 confidence in the Horizon system by branches.
 6 "Potential impact upon ongoing legal cases
 7 where branches are disputing the integrity of
 8 Horizon data."
 9 I emphasise "ongoing legal cases".
 10 Then finally:
 11 "It could provide branches ammunition to
 12 blame Horizon for future discrepancies."
 13 Now, none of those concerns, you agree,
 14 Mr Wilson, would count for anything in the
 15 discharge of your duties under the Criminal
 16 Procedure and Investigations Act if that
 17 material was disclosable.
 18 **A.** Sorry, say that again, please?
 19 **Q.** None of those concerns would count for anything
 20 if the material was disclosable. In other
 21 words --
 22 **A.** Yes, no, I understand what you're saying. Yes,
 23 I agree with you.
 24 **Q.** Yes. Right. Is there any record of you
 25 remonstrating with Mr Simpson about that or
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1 **A.** No, I wasn't suppressing the vulnerabilities.
 2 I didn't agree with the solutions. I -- my view
 3 was that all of the subpostmasters and
 4 mistresses should have been told about the bug.
 5 **Q.** Well, you accept, do you not, that, by this
 6 time, October 2010, concerns about the Horizon
 7 system -- and this was the finding of
 8 Mr Justice Fraser -- concerns about the Horizon
 9 system had been in existence for 10 years by
 10 this time?
 11 **A.** Yes, if that's -- that's when they first became
 12 known, yes.
 13 **Q.** You have, in your evidence today, conceded that
 14 you were aware from 2005/2006 about suggestions
 15 about system vulnerability, haven't you?
 16 **A.** I'm not sure of the dates but I've agreed with
 17 what counsel put to me, yes.
 18 **Q.** Well, could we, please -- you've just said that
 19 you didn't agree with the solution, so it
 20 follows that you must have read the solutions in
 21 detail, if you were going to disagree with them.
 22 **A.** Yes.
 23 **Q.** Could we go to solution number 1, please.
 24 I want to concentrate, please, on solution
 25 number 1:
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1 "Alter the Horizon branch figure at the
2 counter to show the discrepancy. Fujitsu would
3 have to manually write an entry value to the
4 local branch account.

5 "IMPACT -- When the branch comes to complete
6 next trading period they would have
7 a discrepancy which they would have to bring to
8 account."

9 Then this:

10 "RISK -- this has significant data integrity
11 concerns and could lead to questions of
12 'tampering' with the branch system and could
13 generate questions around how the discrepancy
14 was caused."

15 That must be the discrepancy referred to in
16 "IMPACT", do you agree?

17 **A.** In the "IMPACT" above?

18 **Q.** Yes, in the line immediately above.

19 **A.** When the branch comes to next -- yes.

20 **Q.** So a discrepancy would have appeared out of thin
21 air, which they would then have to bring to
22 account.

23 Then the final sentence:

24 "This solution could have moral implications
25 of Post Office changing branch data without

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1 **A.** Well, I didn't read it like that and I never
2 believed that there was a backdoor into the sub
3 post offices.

4 **Q.** Mr Wilson, did you make any attempt to clarify
5 the disturbing contents of those passages that
6 I have put to you?

7 **A.** I think what I did was I spoke to Jon Longman --
8 Alan Simpson, and said that the only acceptable
9 solution in relation to these -- in relation to
10 this issue was to inform every branch, every
11 subpostmaster what the problem was and to have
12 it fixed in line with, I think, the suggestion
13 that was in the second attachment by Mr Jenkins.

14 **Q.** Mr Wilson, that wasn't the question I asked you.
15 I asked you: did you do anything to clarify what
16 appears to be an obvious interpretation of
17 remote access? Did you do anything at all to
18 clarify with anybody the disturbing contents of
19 what I have put to you?

20 **A.** Well, I didn't understand it to be remote
21 access.

22 **Q.** I suggest that it cannot be interpreted in any
23 other way, Mr Wilson. It must be remote access.

24 **A.** Well, I didn't understand it to be.

25 **Q.** That, of course, would have been disclosable,

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1 informing the branch."

2 Now, your evidence earlier today was that
3 you believe that that referred to an individual
4 visit to each branch to go to, not figuratively
5 speaking or metaphorically speaking, the counter
6 but to the actual counter, to alter the data.

7 That was your evidence.

8 **A.** Yes.

9 **Q.** I suggest that that evidence is untenable in
10 view of the last sentence:

11 "This solution could have moral implications
12 of Post Office changing branch data without
13 informing the branch."

14 **A.** Well -- it could have moral implications. If
15 they're not telling the branch that they're
16 altering the data at the counter, that's
17 dishonest.

18 **Q.** Of course it would be but we're not talking here
19 about them coming along and saying, "I need to
20 do something with your terminal at the branch,
21 the terminal which is on the counter". What
22 we're talking about here is the covert insertion
23 of data, authorised by the Post Office and
24 implemented by Fujitsu. That's what we're
25 talking about, aren't we?

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1 whether it was Legacy Horizon or whether it was
2 Horizon Online, wouldn't it?

3 **A.** Well, that would have stopped prosecutions
4 completely.

5 **Q.** Of course it would. But moving on -- and this
6 is the final matter -- do you not agree --
7 I mean, you say that it is now, in retrospect,
8 clearly disclosable, but do you not agree that
9 a continuum of error, whether it be in Legacy
10 Horizon or Horizon Online, in other words
11 complaints about the fragility of the system and
12 instances of system error, would be disclosable
13 in a Legacy Horizon case, even if it were to
14 refer to Horizon Online?

15 **A.** I do now.

16 **Q.** Why didn't you then?

17 **A.** Because I believed that there were two separate
18 systems and that the new Horizon, as I phrase
19 it, was not impacting on the old Horizon.

20 **Q.** But if you look at it in this way -- and surely
21 this would have been apparent to you -- the old
22 system was perceived to be subject to bugs,
23 errors and defects and so, therefore, a new
24 system, which was attempting to be more robust
25 than the previous system was being rolled out;

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1 correct?
 2 **A.** Yes.
 3 **Q.** You follow me?
 4 **A.** Yes.
 5 **Q.** Yet the new system, contrary to expectations,
 6 results in these covert balancing errors of
 7 which subpostmasters are completely blameless
 8 and totally unaware. That must be disclosable,
 9 mustn't it, because it goes to the ability of
 10 Fujitsu to actually implement a correct system?
 11 **A.** Well, I agree with you now, yes.
 12 **Q.** Does this not -- and, again, I ask this and
 13 I ask you, please, to reflect carefully before
 14 you answer, does this not reveal a symbiotic
 15 relationship between Fujitsu and the Post
 16 Office, the Post Office protecting Horizon at
 17 all costs, for both its own reputation, and
 18 Fujitsu aiding and abetting it to serve its own
 19 commercial interests as well?
 20 **A.** I think at a high level, having considered all
 21 of the documents that I've seen, and listened to
 22 arguments like you're putting now, from counsel,
 23 that, at a high level yes, there was
 24 a protection of Horizon.
 25 **Q.** Of course, you were involved in that high level
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1 in relation, of course, albeit at a distance,
 2 but nevertheless in relation to the laudatory
 3 plaudits you received from David Y Smith, Rod
 4 Ismay and Paula Vennells, weren't you?
 5 **A.** No, I wasn't inviting plaudits. I was
 6 surprised. I didn't know most of the people on
 7 the list. I had never met either of the three
 8 that you've just named. I didn't realise that
 9 the interest was as such as it's been
 10 demonstrated in the document. I'm very sorry,
 11 but I didn't.
 12 **MR HENRY:** Thank you very much.
 13 **SIR WYN WILLIAMS:** Anyone else?
 14 **MR BEER:** No, that's it, sir.
 15 **SIR WYN WILLIAMS:** Well, thank you for returning to
 16 give evidence, Mr Wilson. It's been a full day
 17 for you but I'm grateful for your participation
 18 in the Inquiry.
 19 **THE WITNESS:** Thank you, sir.
 20 **SIR WYN WILLIAMS:** 10.00 tomorrow, Mr Beer?
 21 **MR BEER:** Yes, that's right, sir. Thank you.
 22 **(4.00 pm)**
 23 **(The hearing adjourned until 10.00 am**
 24 **the following day)**
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