

Tuesday, 23 January 2024

1
 2 (10.14 am)
 3 **MS PRICE:** Good morning, sir. Can you see and hear us?
 4 **SIR WYN WILLIAMS:** Yes, thank you.
 5 **Witness statement of KENNETH WILLIAM DONNELLY adduced**
 6 **MS PRICE:** Sir, before we turn to Mr Daily's evidence, may
 7 I please deal with the witness statement of Mr Kenneth
 8 Donnelly, who is the current Deputy Crown Agent for
 9 Specialist Casework at the Crown Office and Procurator
 10 Fiscal Service. For the transcript, his statement can
 11 be found at WITN10510100. There is no need to bring
 12 that up on screen but I can confirm, sir, that this
 13 witness statement has been disclosed to Core
 14 Participants.
 15 Mr Donnelly's evidence is relevant, sir, both to
 16 Phases 4 and 5 of the Inquiry. For the purposes of
 17 Phase 4, can I please indicate that paragraphs 1 to 43
 18 are to be treated as read into the Inquiry's record,
 19 although I do not intend to read the content of those
 20 paragraphs now. As a result, this evidence may be taken
 21 into account by you in due course, even though it has
 22 not been the subject of oral evidence during Phase 4.
 23 For the remaining paragraphs in Mr Donnelly's
 24 witness statement, namely paragraphs were 44 to 74,
 25 these will either be the subject of oral evidence or

1

1 27 December 2023.
 2 **A.** Sorry, can you repeat that.
 3 **Q.** Do you have an A2 in your bundle?
 4 **A.** No, I don't.
 5 **MS PRICE:** Sir, my apologies. We're just obtaining a hard
 6 copy of the second statement for insertion in the
 7 witness's bundle.
 8 **SIR WYN WILLIAMS:** Yes, of course.
 9 (Pause)
 10 **MS PRICE:** Sir, I understand the document is being printed.
 11 I don't know if you would rather we broke for five
 12 minutes or whether you're content to remain on screen.
 13 **SIR WYN WILLIAMS:** No, let's just get it done, and I'm happy
 14 to sit here.
 15 **MS PRICE:** Thank you, sir. (Pause)
 16 Mr Daily, do you now have a copy of the statement in
 17 your name, dated 27 December 2023?
 18 **A.** I do.
 19 **Q.** Could you turn, please, to page 12 of that statement?
 20 **A.** Yes.
 21 **Q.** Is there a visible signature on that copy?
 22 **A.** Yes, there is.
 23 **Q.** Is that your signature?
 24 **A.** It is.
 25 **Q.** I understand that there are some corrections which you

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1 read into the record in Phase 5. I should also confirm
 2 that this witness statement will be published in its
 3 entirety on the Inquiry's website after today's hearing.
 4 **SIR WYN WILLIAMS:** All right, thank you very much.
 5 **MS PRICE:** Thank you, sir.
 6 May we please call Mr Daily.
 7 **SIR WYN WILLIAMS:** Yes.
 8 **ROBERT DAILY (sworn)**
 9 **Questioned by MS PRICE**
 10 **MS PRICE:** Could you confirm your full name, please,
 11 Mr Daily.
 12 **A.** Robert Daily.
 13 **Q.** Thank you for coming to the Inquiry to assist it in its
 14 work. As you know, I will be asking you questions on
 15 behalf of the Inquiry.
 16 You should have hard copies of two witness
 17 statements in your name in a bundle in front of you.
 18 The first is at tab A1 and is dated 7 November 2023. If
 19 you could turn to page 39 of that, please.
 20 **A.** I have that.
 21 **Q.** Do you have a copy with a visible signature?
 22 **A.** Yes, I do.
 23 **Q.** Is that your signature?
 24 **A.** It is.
 25 **Q.** The second statement is at tab A2 and is dated

2

1 wish to make to your written evidence in light of
 2 documents which have recently been provided to you by
 3 the Inquiry; is that correct?
 4 **A.** Yes.
 5 **Q.** Would you like to make those corrections?
 6 **A.** Yes, in my first statement -- sorry, in my second
 7 statement I stated at paragraph 25, "On my first
 8 statement, I believe that from 2006 all reports for
 9 non-police authorities were required to be submitted to
 10 the Crown Office and Procurator Fiscal Service
 11 electronically". I asked for that to be amended to --
 12 well, I actually say:
 13 "Secondly, I believe the date I gave was likely
 14 incorrect. I now think it was from 2009 or 2010, and
 15 not 2006. From a document I received last week, it
 16 states, from the Crown Office and Procurator Fiscal
 17 Service, that all Specialist Reporting Agencies should,
 18 from 1 January 2006 be reporting all cases
 19 electronically to the Procurator Fiscal."
 20 So it was to change that back again.
 21 And in paragraph 23 of the second request asked me
 22 what role I played in preparing the prosecution -- this
 23 for William Quarm. I stated:
 24 "The wording of the charge is similar to the wording
 25 used when you submit a charge via the SRA website but

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1 I cannot recall with certainty if this is something
 2 I did."
 3 I can now say that the report would have been
 4 submitted via the SRA website, however, I cannot recall
 5 if it was myself who submitted it or Raymond Grant who
 6 was my ex-colleague?
 7 Also, in my first statement, at paragraph 11,
 8 I recall I was temporarily promoted to the role of
 9 Investigation Manager in 2000 and I recall I attended
 10 some training at that time. Having looked at my
 11 statement again, paragraph 69 to 71 described parts of
 12 my training in 2005. I would also have been trained on
 13 these parts in 2000.
 14 **Q.** Thank you, Mr Daily. With those corrections made, are
 15 the contents of your statements true to the best of your
 16 knowledge and belief?
 17 **A.** Yes, they are.
 18 **Q.** For the purposes of the transcript, the references for
 19 Mr Daily's statements are WITN08940100 and WITN08940200.
 20 Mr Daily, I will not be asking you about every
 21 aspect of the witness statements you have provided,
 22 which will be published on the Inquiry's website in due
 23 course. I will instead be asking about certain specific
 24 issues which are addressed in them.
 25 **A.** Yes.

5

1 you recall?
 2 **A.** I can't fully recall, it could have been any time
 3 between six months -- maybe more, maybe less. I can't
 4 recall.
 5 **Q.** During had time, were you involved in conducting
 6 investigations?
 7 **A.** Only as a second officer.
 8 **Q.** At that stage, your temporary role did not become
 9 a permanent one; is that right?
 10 **A.** That's correct.
 11 **Q.** Is it right that you applied for a further temporary
 12 Investigation Manager role in 2004 --
 13 **A.** Yes.
 14 **Q.** -- and you were successful in obtaining that position?
 15 **A.** Yes.
 16 **Q.** On this occasion, after the six-month temporary period
 17 came to an end, you were told your position was being
 18 made permanent; is that right?
 19 **A.** That's correct.
 20 **Q.** This was in around 2005?
 21 **A.** Yes.
 22 **Q.** You say in your statement at paragraph 4 that in 2011
 23 your role changed to Security and Investigation Manager?
 24 **A.** That's correct.
 25 **Q.** And your current role is that of Security Manager?

7

1 **Q.** Starting, please, with the roles you have held with the
 2 Post Office, you have been employed by the Post Office
 3 since 1979; is that right?
 4 **A.** That's correct.
 5 **Q.** You started as a counter clerk?
 6 **A.** Yes.
 7 **Q.** You have set out in your statement the various roles you
 8 held thereafter and up until 1997, and those roles
 9 included roles in the Remittance Unit, Cash Management
 10 and Distribution; is that right?
 11 **A.** That's correct.
 12 **Q.** In 1997 you joined the Security Team with the Post
 13 Office?
 14 **A.** That's correct.
 15 **Q.** You started in the Security Team in 1997 in a Postal
 16 Officer grade; is that right?
 17 **A.** Yes.
 18 **Q.** So you were not, at that point, involved in criminal
 19 investigations; is that right?
 20 **A.** No.
 21 **Q.** Then there was a period in around 2000 when you were
 22 temporarily promoted to the role of Investigation
 23 Manager?
 24 **A.** Yes.
 25 **Q.** Roughly how long were you in that temporary role; can

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1 **A.** Yes.
 2 **Q.** Were these roles the same in substance, albeit different
 3 in title?
 4 **A.** In substance, in 2011, I believe it was, I took on the
 5 role of the physical security as well, and that was
 6 visiting branches after robberies or burglaries or to
 7 give security advice.
 8 **Q.** I would like to turn, please, to the structure of the
 9 Security Team over the time you have worked within it.
 10 You say in your statement at paragraph 33 that, when you
 11 joined the Security Team, there was a Head of Security
 12 and Investigations?
 13 **A.** Yes.
 14 **Q.** That Head of Security and Investigations oversaw the
 15 Investigation Team --
 16 **A.** Yes.
 17 **Q.** -- the Security Team --
 18 **A.** Yes.
 19 **Q.** -- the Physical Security Team --
 20 **A.** Yes.
 21 **Q.** -- and the Casework Team?
 22 **A.** I believe so.
 23 **Q.** At this stage, the Investigation Team dealt solely with
 24 criminal investigations and had its own Head of
 25 Investigations; is that right?

8

1 A. That's correct.
 2 Q. You recall there being a restructure in 2008 --
 3 A. Yes.
 4 Q. -- when a senior accurate manager position was
 5 introduced?
 6 A. Yes.
 7 Q. Is it right that you recall the Senior Security Manager
 8 reporting to the Head of Security --
 9 A. Yes.
 10 Q. -- and overseeing a number of teams within the Security
 11 Team?
 12 A. Yes.
 13 Q. Was it at this point that the Fraud Team was created in
 14 2008?
 15 A. The Fraud Team was always there, it was just called
 16 Investigation Managers or Investigation Team, I believe.
 17 Then we called it the Fraud Team. It was just
 18 a change --
 19 Q. A change in name?
 20 A. A change in -- yes.
 21 Q. You recall the Fraud Team being responsible for
 22 undertaking investigations?
 23 A. Yes.
 24 Q. Is it also right that when the restructure happened in
 25 2008 you were required to submit your CV?

9

1 A. Yes.
 2 Q. Do you recall the various restructuring exercises also
 3 involving headcount reductions?
 4 A. I don't. I don't recall.
 5 Q. I'm sorry, could you say that again with your voice up
 6 a little?
 7 A. I don't recall.
 8 Q. Do you recall any of the restructuring exercises
 9 impacting on the workload of Investigators?
 10 A. In 2019? Err --
 11 Q. There were a number you dealt with: 2008, 2011, 2014 to
 12 15 and 2019. In relation to any of those do you recall
 13 that impacting upon the workload of Investigators?
 14 A. Investigations had stopped by 2019. That was the only
 15 time. 2014, and the other dates, no, there was no
 16 impact.
 17 Q. In terms of the geographical structure of the Security
 18 Team and where you sat within it, you say at
 19 paragraph 10 of your first statement that you have been
 20 based in Glasgow throughout the time you have held roles
 21 in the Security Team; is that right?
 22 A. That's correct.
 23 Q. Does that include the period from 1997 until you took up
 24 a permanent Investigator role in 2005?
 25 A. That's correct.

11

1 A. Yes.
 2 Q. Was that, in essence, you re-applying for your own job
 3 as an Investigator?
 4 A. Yes.
 5 Q. You have highlighted in your second statement that the
 6 CV you submitted in 2008 erroneously contained your
 7 wife's educational achievements; is that right?
 8 A. Yes.
 9 Q. Did you realise this and correct this at the time?
 10 A. No.
 11 Q. So it's something that's only come to light in the
 12 course of preparing your second statement?
 13 A. Yes.
 14 Q. At paragraph 35 of your statement, you say that in 2011,
 15 Investigation Managers also took on a physical security
 16 role as well as their investigation role?
 17 A. Yes.
 18 Q. That's what you were referring to earlier --
 19 A. Yes.
 20 Q. -- when there was the title change?
 21 A. Yes.
 22 Q. You recall there being further restructures in 2004 to
 23 2005 and in 2009 --
 24 A. Yes.
 25 Q. -- sorry, 2019?

10

1 Q. When you held a temporary Investigator role in 2000,
 2 were you, at that stage, investigating matters both in
 3 England and in Scotland?
 4 A. No, just Scotland.
 5 **SIR WYN WILLIAMS:** So do I take it, just so that I'm clear
 6 from the start, Mr Daily, that the structure of the
 7 Security Team which you've described relates to the
 8 structure over the whole of the United Kingdom? It
 9 wasn't confined to Scotland, your description, was it?
 10 A. That's correct.
 11 **SIR WYN WILLIAMS:** Thank you.
 12 **MS PRICE:** Is it right that, since 2005, you have been part
 13 of the Security Operations North team.
 14 A. Yes.
 15 Q. You have addressed in your statements and I will be
 16 asking you in due course about your involvement in the
 17 criminal investigation and prosecution of two
 18 individuals: Peter Holmes and William Quarm. Mr Holmes'
 19 Post Office branch was based in Newcastle and Mr Quarm's
 20 Post Office branch was based in the Outer Hebrides in
 21 Scotland. Both of these investigations commenced in
 22 2008. Since 2005, have you been conducting
 23 investigations into matters both in England and
 24 Scotland?
 25 A. Yes.

12

- 1 Q. In terms of the geographical remit of the Security
2 Operations North team, does that cover the north of
3 England as well as Scotland?
- 4 A. It did, yes.
- 5 Q. Can you help with a little bit more detail on which
6 parts of the north of England came within your remit or
7 come within your remit?
- 8 A. I believe it was Cumbria and over to Newcastle, and
9 upwards.
- 10 Q. I'd like to turn, please, to the decision-making process
11 for criminal investigation and prosecution of
12 subpostmasters, their assistants and managers and Post
13 Office employed branch staff in England and Wales, on
14 the one hand, and Scotland, on the other. Could we have
15 on screen, please, paragraph 136 of Mr Daily's first
16 witness statement, that is page 36 of WITN08940100.
- 17 At paragraph 136, you say this:
- 18 "The conduct of investigations in Scotland was
19 similar to England and Wales, the key difference was in
20 the prosecution of cases. As I have described elsewhere
21 in this statement, the prosecuting authority in Scotland
22 is the COPFS."
- 23 That's the Crown Office Procurator Fiscal Service;
24 is that right?
- 25 A. That's correct.

13

- 1 Policy from 2013, 2014, and 2018. You refer to
2 a flowchart from the first two of those versions and you
3 use that to explain how the process worked in England
4 and Wales, and in Scotland.
- 5 A. Yes.
- 6 Q. Could we have on screen, alongside Mr Daily's statement,
7 if that's possible at all, POL00031005. We can see that
8 this is the August 2013 version of the Post Office
9 Conduct of Criminal Investigations Policy. Going to the
10 bottom of page 2, please. We see the start of the
11 flowchart you refer to in your statement. It provides,
12 on the left-hand side, a number of sources of a case
13 being raised, including an audit shortage, the Grapevine
14 team -- can you help with which team that was?
- 15 A. The Grapevine team, they were our alarm receiving centre
16 to start with, and dealt with any suspicious instances
17 the post office's -- post offices were encouraged to
18 phone them up so we could send out a text blast. In
19 regards to information and regards to enquiries, I can't
20 recall what they would have provided to us.
- 21 Q. Also listed as a source are "Contract Managers" and
22 "Client, eg DVLA -- DWP". Going over the page, please,
23 to page 3 of this document, looking down the page we can
24 see a number of steps on the flowchart for process,
25 "Case assigned to Security Team. Is there evidence to

15

- 1 Q. "All cases, whether they be police or non-police cases,
2 have to be submitted to the COPFS, who then decide
3 whether to proceed to prosecution or not. In around
4 2006, it became a requirement that non-police
5 authorities had to report cases through the COPFS
6 Specialist Reporting Agency website. On inputting
7 a case you had to input a charge to proceed to
8 submission."
- 9 So that's the date you addressed in correcting your
10 second statement at the outset?
- 11 A. That's correct, yeah.
- 12 Q. So you believe that that date is, in fact, correct?
- 13 A. Yes.
- 14 Q. In relation to how cases were submitted to the Crown
15 Office and Procurator Fiscal Service, before the change
16 in 2006, how did that happen?
- 17 A. It was a manual report, you had to do a typed report
18 that was similar to the offender report, that was then
19 delivered to the Procurator Fiscal by post or by hand.
- 20 Q. You deal with the process followed by Post Office
21 Investigators for criminal investigations at
22 paragraph 59 of your first statement. Could we have
23 that on screen, please. It's page 17.
- 24 At paragraph 59, you say that you have considered
25 three versions of the Conduct of Criminal Investigations

14

- 1 proceed?" If the answer is no, then "No Further Action,
2 case to be closed". If yes, "Interview and Compile
3 Evidence".
- 4 The next step is "Case Preparation, Phase 1 MG
5 Format", then the next stage is "Team Leader to Review
6 the Case File, Proceed with the case?" If it's no, then
7 it's case closure; "Further action" could be "Further
8 enquiries to be made, File returned to team leader"; if
9 it is yes, then it goes to the Criminal Law Team to
10 review the case file. "Proceed with case?"
- 11 No, then it's "No Further Action"; "Further Action"
12 required, there could be further enquiries made, "File
13 returned to the Criminal Law Team and team leader
14 informed"; if yes, then it goes on to Cartwright King to
15 produce the charges.
- 16 Is it your evidence that the process in place up to
17 the point of the Criminal Law Team, so stopping short of
18 going to Cartwright King, that that was essentially the
19 same for Scotland as it was for England and Wales, until
20 the introduction of a firm of Scottish solicitors into
21 the process for Scotland in 2013?
- 22 A. Yes.
- 23 Q. In a Scottish case, before this change, so before the
24 introduction of a Scottish firm of solicitors, you say
25 that a decision was returned to you by the Criminal Law

16

1 Team -- so this is in paragraph 59 of your statement, we
2 see alongside:

3 "If the decision was to proceed with prosecution,
4 [you] would submit the file to the [Crown Office and
5 Procurator Fiscal Service]."

6 Is that right?

7 **A.** That's correct.

8 **Q.** "If the decision was not to proceed, [then the] case
9 would be closed."

10 **A.** That's correct.

11 **Q.** This document shows the process in place in 2013. Up to
12 the point of the flowchart where there is consideration
13 of a case by the Criminal Law Team, and not beyond that,
14 was the process any different from 2005 to 2013?

15 **A.** With the exception of Cartwright King being involved
16 later on -- I don't know when Cartwright King became
17 involved but you essentially --

18 **Q.** Stopping short of Cartwright King and stopping at the
19 stage of it being referred to the Criminal Law Team --

20 **A.** Yes.

21 **Q.** -- and a decision being made by them as to proceeding,
22 was the process we've looked at in this flowchart the
23 same between 2005 and 2013 or did it differ in any
24 material way?

25 **A.** From what I recall, it was the same.

17

1 **Q.** Looking then to the training you received in 2005 at
2 paragraph 12 here, you say:

3 "I recall that when taking up the role of
4 Investigation Manager, I received 4-5 weeks training in
5 the training unit above the Lavender Hill Post
6 Office/Battersea Delivery Office in London. The
7 training was given by Royal Mail Group accredited
8 trainers who that experience of investigations. The
9 training covered the Police and Criminal Evidence Act
10 1984 Codes of Practice, Theft Act, carrying out
11 searches, suspect offender interviews, cognitive witness
12 interviews, taking witness statements (including the use
13 of the Solicitor and Friends forms), the Regulation of
14 Investigatory Powers Act, IIMARC, [which you explain in
15 brackets here refers to 'information, intention, method,
16 administration, risk assessment, communications, human
17 rights and other legal issues'] and NPA notifications
18 ('NPA' refers to 'non-police agency', and the
19 notifications refer to notifications we made to the
20 police about the criminal proceedings we undertook.)"

21 It appears from the list of topics here that this
22 training focused on investigation in England and Wales;
23 is that right?

24 **A.** Yes.

25 **Q.** Before we turn to the training you received on

19

1 **Q.** Before we turn to the introduction of Scottish
2 solicitors into the process for Scottish cases in 2013
3 and the reasons for that, I'd like to deal, please, with
4 the training you had for your role as a Post Office
5 Investigator. That document can come down. Thank you.

6 In terms of your experience when you first took up
7 a temporary investigation role in 2000, did you have any
8 experience of criminal investigation or criminal law,
9 whether in England and Wales or Scotland, at that point?

10 **A.** No.

11 **Q.** Could we have on screen, please, paragraph 11 of
12 Mr Daily's first statement. That is page 5. At
13 paragraph 11 you recall attending some training when you
14 were temporarily promoted in 2000. Given the correction
15 you made at the outset of your evidence, should we
16 understand that the following paragraph, which deals
17 with training you received on taking up the role of
18 Investigation Manager in 2005, the training detailed
19 there, was also received in 2000, or was it some lesser
20 version of that training?

21 **A.** It was a lesser version of the training. There was
22 parts I can't recall, in 2000 the Regulation of
23 Investigatory Powers, the IIMARC or the NPA
24 notifications. The NPA, the non-police agency -- we
25 only dealt with Scottish cases in 2000, so the team did.

18

1 investigations in Scotland, I'd like to deal, please,
2 with some of the detail of your initial training on
3 lines of inquiry and disclosure obligations in England
4 and Wales. Could we have on screen, please, page 20 of
5 this statement, paragraph 72. In paragraph 72 you say
6 this:

7 "Regarding the Investigator's duties in carrying out
8 investigations, I recall during the initial training
9 that we were taught to ensure all evidence is obtained,
10 lines of inquiries are completed, mitigating
11 circumstances are considered and investigated, and
12 interviews are conducted within guidelines. All
13 activities taken were to be recorded on the Event Log."

14 Were you aware from your initial investigator
15 training that there was an obligation on a criminal
16 investigator to pursue lines of inquiry which pointed
17 away from the guilt of the suspect?

18 **A.** Yes.

19 **Q.** You go on at paragraph 73 to say this:

20 "Regarding obtaining evidence in the course of
21 an investigation, also during initial training we were
22 taught that the Investigator must obtain all original
23 documents (for example, in the event of an audit
24 shortage, audit cash sheets, Horizon reports printed at
25 the time of the audit, Branch Trading Statements and

20

1 Horizon reports produced by the branch)."
 2 The documents to which you refer here, are they the
 3 ones you would obtain as an Investigator at a branch,
 4 where an audit of the branch had discovered an apparent
 5 shortfall.

6 **A.** Yes.

7 **Q.** You go on at paragraph 74 to deal with obtaining
 8 evidence from third parties. You say this:
 9 "The initial training also taught us about obtaining
 10 evidence from third parties who might hold relevant
 11 evidence. For example, bank statements, if it was
 12 suspected a shortfall was due to the monies being
 13 deposited into a suspect's bank account using Horizon.
 14 Also, ARQ requests to Fujitsu in order to obtain Horizon
 15 data in various cases (for example, to investigate
 16 deposits into bank accounts in Post Office Card Account
 17 cases involving a vulnerable person duped into making
 18 multiple withdrawals)."

19 When you were an Investigator, were you aware that
 20 the obligation to pursue lines of inquiry pointing away
 21 from, as well as towards, the guilt of a suspect,
 22 extended to material in the hands of a third party, for
 23 example, Fujitsu?

24 **A.** Yes.

25 **Q.** At paragraph 75, you deal with training on disclosure
 21

1 were an Investigator completing disclosure documentation
 2 in England and Wales, you were acting as the Disclosure
 3 Officer in the case?

4 **A.** Yes.

5 **Q.** Did you understand from your initial training that this
 6 was a distinct role, over and above your role as
 7 an Investigator, which imposed on you additional and
 8 distinct duties, such as, for example, the obligation to
 9 draw material to the attention of the prosecutor where
 10 there was any doubt as to whether that might undermine
 11 the prosecution case or might reasonably be expected to
 12 assist the defence disclosed by the accused?

13 **A.** I would have.

14 **Q.** I'm sorry, can you repeat that?

15 **A.** I would have.

16 **Q.** Could we have on screen, please, document reference
 17 POL00121680. The top email on this page is an email
 18 from Andrew Daley to you, among other Investigators,
 19 dated 6 September 2010. It forwards on an email change
 20 with the subject line "Committal Papers", asking whether
 21 there is any interest in a presentation from a Royal
 22 Mail Investigation Procedures and Standards Manager
 23 called Mick Matthews, in relation to procedures and
 24 standards applying to committal papers.

25 So if we can scroll down a little, Mick Matthews'
 23

1 obligations and you say this:

2 "Regarding an Investigator's disclosure obligations,
 3 the initial training taught us that, in England, it is
 4 the duty of the Investigator [I think that should be
 5 'to] provide a record of all information obtained and
 6 to disclose all relevant information to the prosecution
 7 and defence."

8 Pausing there, you repeat the second part of this
 9 explanation of an Investigator's disclosure obligations,
 10 that is to disclose all relevant material to the
 11 prosecution and defence at paragraph 117 of your first
 12 statement, in the context of disclosure obligations on
 13 you in the prosecution of Peter Holmes. You have,
 14 however, made a correction to this in your second
 15 statement at paragraph 2.8. Is it right that you now
 16 recall that the disclosure obligation on a Post Office
 17 Investigator in England and Wales was to provide all
 18 appropriate material, used and unused, to the Criminal
 19 Law Team, who would deal with onwards disclosure to the
 20 defence?

21 **A.** That's correct.

22 **Q.** You have dealt with the need to complete schedules of
 23 used and unused material as an Investigator in England
 24 and Wales at paragraph 29 of your first statement. Did
 25 you understand from your initial training that, when you
 22

1 emails at the bottom of the page, also dated 6 September
 2 2010, was originally sent to Iain Murphy and Andy
 3 Hayward, and he says:

4 "Iain/Andy

5 "I have developed Procedures and Standards in
 6 respect of Committal Papers and this has been agreed by
 7 the Criminal Law Team. Accordingly the P&S and the
 8 relevant forms are associated with this email.
 9 Arrangements are in hand to publish the documents on
 10 SharePoint and the GSD.

11 "A presentation that is been delivered to RML ..."

12 Is that Royal Mail Letters?

13 **A.** Yes.

14 **Q.** "... and PFWW ..."

15 Parcelforce Worldwide?

16 **A.** Yes.

17 **Q.** "... Investigators as they do not get the same number of
 18 committals as Investigators in [Post Office Limited] so
 19 you wish to merely forward this to your Investigators
 20 for their information in respect of the procedures and
 21 amended forms."

22 You address this email and the documents which were
 23 attached to it at paragraph 78 of your first statement.
 24 We needn't pull up on screen, unless you wish to go to
 25 it, Mr Daily, but you say that you cannot recall exactly
 24

1 when you received the materials attached to Mick
 2 Matthews' original email but your belief is that this
 3 would have been the first occasion on which you saw
 4 those materials?

5 **A.** The materials within his, is it, file? Yes.

6 **Q.** The materials to which you were referred for the
 7 purposes of making your statement, the attachments to
 8 the email, included a new Procedures & Standards
 9 document relating to committal papers dated July 2010;
 10 an updated version of a Procedures & Standards document
 11 dealing with disclosure of unused material; and the
 12 Criminal Procedure and Investigations Act 1996, and that
 13 was dated 1 July 2010; it also attached a copy of the
 14 Criminal Procedure and Investigations Act 1996 Code of
 15 Practice.

16 Just to clarify, is it your evidence at paragraph 78
 17 of your statement that you had not received any of these
 18 documents, including a copy of the CPIA Code of
 19 Practice, before this point in September 2010?

20 **A.** Sorry, can I see paragraph 78 again?

21 **Q.** Of course, if we can pull up the paragraph on screen,
 22 it's paragraph 78 of the first statement and that is
 23 page 21. Scrolling down a little, please, at
 24 paragraph 77, you refer to the document we've just
 25 looked at, the email from Andrew Daley, dated

25

1 those attachments that we've just looked at, the first
 2 three?

3 **A.** Yeah, I can see that.

4 **Q.** You say you're asked:
 5 "... where I was based when I received this email,
 6 whether this was the first time I had been sent these
 7 materials and if any presentation about them was given."

8 Then you say at 78:

9 "The documents relate to some procedures and
 10 standards that have been developed in relation to
 11 committal papers. At the time I received the email at
 12 document [and then the document reference] I was based
 13 in Scotland. I can't recall exactly when I received the
 14 materials, but it is my belief that this would have been
 15 the first occasion on which I saw them."

16 We'll come on to the presentation and your
 17 recollection on that, but my question is in relation to
 18 the attachment that is the Code of Practice and whether
 19 that is in the same category as the Procedures &
 20 Standards documents, in that you received it for the
 21 first time at this stage or whether you had received
 22 that document any sooner.

23 **A.** I can't recall receiving it before then.

24 **Q.** Okay. You also say at paragraph 78 that you cannot
 25 recall receiving the presentation referred to in the

27

1 6 September 2010, together with its attachments and
 2 there are four attachments there. Three of those are
 3 ones that I've just referred to. One of them is the
 4 CPIA Code of Practice and we can go to that document if
 5 it would help to see it? Would that assist --

6 **A.** Yes.

7 **Q.** -- or do you know the document I'm referring to?

8 If we can just take the attachments in turn,
 9 actually, the first is POL00104837. That is the
 10 Procedures & Standards document which Mick Matthews
 11 refers to creating, the "Committal and Summary Trial
 12 Papers and Processes", July 2010.

13 The next attachment was POL00104848. This is the
 14 "Appendix 1 to P&S 9.5 Disclosure of Unused Material and
 15 the Criminal Procedure and Investigations Act 1996", and
 16 that version is dated 1 July 2010.

17 The next attachment is POL00064059. That is the
 18 CPIA Code of Practice. If you need to, we can look at
 19 the next page, scrolling down a little, please.

20 **A.** Yeah, that's fine. Can I go back to paragraph 78 again,
 21 please?

22 **Q.** Yes, of course.

23 **A.** Can I see the whole --

24 **Q.** Paragraph 78 of the statement, page 21, please. So
 25 looking first at 77. You've looked at the email and

26

1 email. Do you mean by that the presentation that Mick
 2 Matthews was offering?

3 **A.** Yes.

4 **Q.** Do you recall any discussion as to whether that kind of
 5 presentation might be useful for Investigators in the
 6 Post Office?

7 **A.** Sorry, I don't recall any discussion around it.

8 **Q.** Okay. When you took up the permanent Investigator role
 9 in 2005, were you given any training on the Horizon
 10 system?

11 **A.** I don't recall any training on the Horizon system. I do
 12 recall, I think, when I was temporary in 2000, we went
 13 to a hotel for a day to look at the system, what that
 14 called, I can't remember.

15 **Q.** You say to look at the system --

16 **A.** Yeah, we were --

17 **Q.** -- what do you mean by that?

18 **A.** We were put in front of terminals and it was in a hotel,
 19 I think it was the Swallow Hotel in Glasgow, it was
 20 known at that time. I'm not sure what it called, to be
 21 honest with you.

22 **Q.** Did you receive any other training on the Horizon system
 23 apart from that training in the hotel in 2000?

24 **A.** I don't recall receiving any other training.

25 **Q.** Did you ever receive any training on analysis of the

28

1 data from the Horizon system?
 2 **A.** No.
 3 **Q.** You say in your statement at paragraph 31 that, during
 4 an investigation, you liaised mainly with Contract
 5 Managers, the Former Agents Debt team and Cash
 6 Management; is that right?
 7 **A.** Yes.
 8 **Q.** Were you given any guidance in your training on which
 9 other teams within the Post Office you should speak to
 10 to gather evidence in a case where the Horizon system
 11 had shown an apparent shortfall?
 12 **A.** Not that I recall.
 13 **Q.** Were you made aware that Product and Branch Accounting
 14 or Information Security might have relevant information
 15 relating to the operation of the Horizon system?
 16 **A.** Sorry can you repeat the question, please?
 17 **Q.** So there are two specific teams I'm asking about,
 18 Product and Branch Accounting and Information Security,
 19 and I'm asking if you were ever made aware that they
 20 might have relevant information when you were looking at
 21 the Horizon system and shortfalls shown by it?
 22 **A.** Now that you've mentioned it, I probably would have been
 23 at the time. I was right when I wrote the statement,
 24 it's what I could recall at that point in time when
 25 I was writing it.

29

1 Scotland.
 2 **Q.** So was this, in essence, on-the-job training?
 3 **A.** Yes, it was.
 4 **Q.** Who provided it?
 5 **A.** My colleagues within the Investigation Team in the
 6 North.
 7 **Q.** Can you recall who that was now?
 8 **A.** It would have been Raymond Grant, Shelley Stockdale,
 9 they'd have been mentoring me.
 10 **Q.** How long did this on-the-job training last?
 11 **A.** Sorry, I'm trying to recall it. I honestly can't recall
 12 how long it lasted. I went out and done a few,
 13 probably, Second Officer interviews and then been thrown
 14 in the deep end, being mentored doing First Officer, and
 15 conducting interviews.
 16 **Q.** The main take-away point for you appears to have been
 17 that, at the time in Scotland, a suspect was not offered
 18 a solicitor to be present in interview, and that's
 19 something which you address elsewhere in your statement
 20 and you say changed in 2010, following the decision in
 21 *Cadder v Her Majesty's Advocate*; is that right?
 22 **A.** That's correct.
 23 **Q.** Setting aside procedural safeguards for interview, did
 24 your on-the-job training cover the offences under
 25 Scottish law which might be relevant where the Horizon

31

1 **Q.** Turning then, please, to training you received on
 2 investigations and prosecutions in Scotland. Could we
 3 have page 6 of the statement on screen at the moment,
 4 please. If we can actually go back to the bottom of the
 5 previous page. After dealing with the 4 to 5 weeks'
 6 training you received, you say:
 7 "After a few months in my role as an Investigations
 8 Manager, I went to Rugby to attend further training,
 9 including courtroom training."
 10 In the next paragraph after this, you say at
 11 paragraph 13:
 12 "Can also recall being given onsite/field training
 13 on Scots Law, with the main difference at the time being
 14 that, in Scotland, a suspect was not offered a solicitor
 15 to be present at an interview."
 16 When did you receive this onsite or field training
 17 on Scots Law?
 18 **A.** When I joined the team after my training.
 19 **Q.** So in 2005?
 20 **A.** Yes.
 21 **Q.** What format did that training take?
 22 **A.** It was sitting with fellow Investigators and going out
 23 to do investigations, primarily as a second officer.
 24 When I say "Scots Law", I probably should correct that
 25 and say the Scottish way of dealing with cases, in

30

1 system showed an apparent shortfall in a branch?
 2 **A.** I don't recall that being the case.
 3 **Q.** It may follow: does that mean it didn't cover the
 4 elements of any such offences which the prosecution
 5 would be required to prove?
 6 **A.** That's correct.
 7 **Q.** Turning then, please, to training on disclosure
 8 obligations which were applicable in Scotland, could we
 9 have on screen, please, page 21 of the statement we have
 10 on screen. At the top of the page here, which is
 11 a continuation of paragraph 75 from the previous page,
 12 you say this:
 13 "I learned on taking up my role in Scotland that it
 14 is the duty of the Investigator to do the same as in
 15 England, with the exception information is provided to
 16 the COPFS. The COPFS considers whether the information
 17 meets the disclosure test before disclosing the
 18 information. I attended some training on disclosure
 19 provided by ..."
 20 There seems to be a gap there. Did you mean to say
 21 by an organisation? We'll come to the document in
 22 a moment, so that may help you.
 23 **A.** Erm -- (*the witness read to himself*)
 24 Yes, the disclosure would have been the -- in
 25 relation to the presentation from the Crown Office and

32

1 Procurator Fiscal Service.

2 **Q.** You say:

3 "... I have located a copy of the presentation that

4 was given which I exhibit to my statement ..."

5 **A.** That's correct.

6 **Q.** Could we have on screen, please, the presentation to

7 which you are referring? That reference, POL00129134,

8 please. The Inquiry understands this document to date

9 to May 2009. Can you help with whether that is correct?

10 **A.** I honestly -- I think it mentioned a date further on but

11 I can't recall what date it was.

12 **Q.** It appears to be a PowerPoint presentation produced by

13 Kirsty McGowan from the Policy Division, Crown Office.

14 Was this training the first training you underwent which

15 dealt specifically with disclosure obligations in

16 Scotland?

17 **A.** Yes, I believe so.

18 **Q.** In terms of dates, can you recall how long after you

19 took up your permanent role in 2005 you went on this

20 training? As I say, in fairness to you, the Inquiry

21 understand that this dates to May 2009.

22 **A.** If I put it into context, if this is the presentation

23 I received in 2009, I would have been aware of

24 disclosure to the Procurator Fiscal before that with my

25 on-the-job training.

33

1 "unnecessary delays"; and in big bold capital letters,

2 "MISCARRIAGES OF JUSTICE". Do you recall this training

3 now?

4 **A.** I recall attending -- it was Tulliallan, which was

5 a police college. If you'd asked me to recollect the

6 document without digging it out in the computer,

7 I wouldn't have recollected it but, reading it, yes,

8 I recall the training.

9 **Q.** You also refer in your first statement at paragraph 80

10 to a "Specialist Reporting Agencies -- Disclosure

11 Course", run by the Scottish police college, which you

12 attended on 20 October 2010. Just to clarify, is that

13 the same training as the training that is the subject of

14 these slides or was that a separate training event?

15 **A.** No, sorry. I -- when you say this was produced in 2009,

16 I thought that was the training you were talking about

17 in 2010 --

18 **Q.** Well, my question for you --

19 **A.** -- I think.

20 **Q.** -- to two different things in your statement: (i) the

21 training you say you went on and you've discovered the

22 document here --

23 **A.** Yeah.

24 **Q.** -- in relation to and, in a separate paragraph -- and

25 perhaps we can go to it. It's paragraph 80 of the

35

1 **Q.** So you were given some on-the-job training, you say, in

2 relation to disclosure obligations by your colleagues in

3 the team who were mentoring you before this; is that

4 what you're saying?

5 **A.** In a roundabout way, we wouldn't sit down and say, "This

6 is disclosure training". It was as the job went on and

7 you had to -- then you were producing your productions,

8 as we call it in Scotland -- it's exhibits in England --

9 that you are just -- you're providing them to the

10 Procurator Fiscal. I don't think anybody really

11 mentioned disclosure that I can recall. It was just

12 something I learned to do and then it was covered by

13 disclosure. I know it was disclosure but we didn't sit

14 down and say, "Let's do disclosure training" to the

15 Procurator Fiscal.

16 **Q.** Going to page 5 of this document, please, this sets out

17 what the SRA -- so Specialist Reporting Agency, and the

18 Post Office was a Specialist Reporting Agency at the

19 times you were involved in -- is that right that --

20 **A.** Yes. Sorry, that's correct.

21 **Q.** "Record ALL relevant information obtained.

22 "Provide the Crown with all relevant information.

23 "Pursue all 'reasonable lines of inquiry'."

24 On page 9, please, the consequences of

25 non-disclosure are set out: "Unnecessary trials";

34

1 statement, that's page 22, please.

2 At paragraph 79, you refer to an email from the

3 5 October 2010 and an attachment, which was joining

4 instructions, which we'll come on to. You detail the

5 circumstances where you were due to attend the

6 "Specialist Reporting Agencies -- Disclosure Course".

7 **A.** Yes.

8 **Q.** You say at the following paragraph:

9 "I believe I was asked to attend the training as

10 I was the Investigation Manager covering Scotland (being

11 based in Scotland at that time). I recall that I did

12 attend on 20 October 2010."

13 Trying to clarify whether you attended one lot of

14 training on disclosure or two, the PowerPoint

15 presentation we've just looked at, with the big bold

16 "MISCARRIAGES OF JUSTICE", was that a separate training

17 event to this one being discussed here or the same one?

18 **A.** The same one.

19 **Q.** Could we have on screen, please, the materials which

20 were provided by email ahead of the course you attended

21 on 20 October 2010 -- apologies, you need a reference

22 for that. POL00129145. So we have the date here,

23 20 October 2010, "Specialist Reporting Agencies --

24 Disclosure Module, Joining Instructions".

25 Just to be clear, the PowerPoint presentation we

36

1 were looking at before, do you think that was one that
2 was shown on this course, on 20 October 2010?

3 **A.** Yes.

4 **Q.** So that was the first time, on 20 October 2010, that you
5 received formal training on disclosure obligations in
6 Scotland --

7 **A.** Yes.

8 **Q.** -- is that right? Okay.

9 There is a page providing background to the course
10 on page 9 of this document, please. This refers to Lord
11 Coulsfield's report on disclosure, dated 12 September
12 2007. It says, four paragraphs down:

13 "Lord Coulsfield's report was published on
14 12 September 2007. The report forms the basis for the
15 current Criminal Justice and Licensing Bill 2008 which
16 will create legislation dealing with disclosure which
17 will be enacted in late 2010."

18 Then over the page, please, scrolling down a little,
19 so we can see the whole page. This deals with the
20 common law duty of disclosure, and it says at the top:

21 "It must be stressed that disclosure or the
22 principles of disclosure are not a new concept. The
23 principles currently exist in common law and have been
24 emphasised in various stated cases and court decisions."

25 Then the case of *Smith v HMA* is referred to. The

37

1 2006. I think a copy of this has been quite recently
2 provided to you by the Inquiry; do you know the document
3 I'm referring to?

4 **A.** I don't. If you could remind me of it, please.

5 **Q.** The reference is WITN10510102. This is the document to
6 which I was referring, Crown Office publication "Reports
7 to the Procurator Fiscal, A Guide for Specialist
8 Reporting Agencies, Seventh Edition".

9 **A.** I would have received that, yes.

10 **Q.** Can you recall who you would have received that from?
11 Was it the Post Office or the Crown Office?

12 **A.** I think it was the Crown Office.

13 **MS PRICE:** Sir, I wonder if that might be a convenient
14 moment for our morning break, please.

15 **SIR WYN WILLIAMS:** Yes, of course. What time shall we
16 start? I'm equally --

17 **MS PRICE:** 11.35, sir.

18 **SIR WYN WILLIAMS:** I mistakenly took myself off screen
19 instead of unmuting myself. I hope you got that,
20 Ms Price.

21 **MS PRICE:** Thank you, sir.

22 **SIR WYN WILLIAMS:** Right, 11.35, please.

23 (11.21 am)

(A short break)

25 (11.36 am)

39

1 quote has in bold this:

2 "... it is their duty to put before the Procurator
3 Fiscal everything which may be relevant and material to
4 the issue of whether the suspected party is innocent or
5 guilty. We repeat, it is not for the police to decide
6 what is relevant and material but to give all the
7 information which may be relevant and material."

8 Then it says this:

9 "The above decision quite clearly and concisely
10 outlines the duties of the police in criminal
11 investigations. However since that judgment a number of
12 Specialist Reporting Agencies now conduct their own
13 investigations and report directly to the Crown and the
14 common law duty placed upon the police equally apply to
15 SRAs."

16 Do you recall reading that joining instructions
17 material ahead of the course?

18 **A.** Not at the time but I have recently pulled it back out
19 and read that.

20 **Q.** Would you have read it ahead of the course?

21 **A.** I would have.

22 **Q.** In advance of the training session in October 2010, were
23 you ever provided by the Post Office or by the Crown
24 Office and Procurator Fiscal Service with the Crown
25 Office Guide for Specialist Reporting Agencies dated

38

1 **MS PRICE:** Hello, sir.

2 **SIR WYN WILLIAMS:** Hello.

3 **MS PRICE:** Can you see and hear us?

4 **SIR WYN WILLIAMS:** I think so.

5 **MS PRICE:** Mr Daily, in terms of differences in the
6 procedure governing investigations in England and Wales,
7 on the one hand, and Mr Scotland, on the other, you
8 identify number of these in your statements. In
9 addition to the difference relating to the presence of
10 a solicitor in interview, which we've already touched
11 on, you raise the following in your witness statements.
12 First, you deal with at paragraph 29, and if we could
13 have that on screen, please, that's page 9.

14 At paragraph 29, you say:

15 "Regarding disclosure, my role involved disclosing
16 information to solicitors representing suspects prior to
17 an interview. As part of the prosecution process in
18 England I would be required to complete the documents of
19 the type at", and you give two references.

20 Those are disclosure schedules, aren't they?

21 **A.** That's correct.

22 **Q.** "... and other disclosure forms. These forms are not
23 required in Scotland."

24 So this is the first additional difference you refer
25 to.

40

1 What was required in Scotland, if those schedules of
2 disclosure were not?

3 **A.** I can't recall if there were any.

4 **Q.** The second additional difference you raise is at
5 paragraph 139 of your statement. If we can have that on
6 screen, please. That's page 37. You say at 139:

7 "Another differs is that, in England, we are only
8 required to summarise the tape transcripts from
9 an interview, while in Scotland we are required to type
10 out the full tape transcripts from an interview."

11 So that's another difference that you're
12 highlighting in your statement?

13 **A.** That's correct.

14 **Q.** Third, you refer to evidential requirements, and this is
15 at paragraph 137. So back one page, please, towards the
16 bottom. Here you say:

17 "The process also differed in that in Scotland
18 corroboration of evidence is required; you need to have
19 two separate sources of evidence. For example, if
20 a person transacts a deposit into their bank account
21 using Horizon without putting the money in the drawer,
22 the two sources of evidence could be drawn from the
23 Horizon data, bank statements, CCTV or witness
24 evidence."

25 On this last difference, how did the requirement for
41

1 knowledgeable about Scots Law. I was concerned that
2 I wasn't receiving the same legal support and I recall
3 that I asked if Scottish solicitors could be sought to
4 assist and advise on whether there was sufficient
5 evidence to submit a file to COPFS. I was advised to
6 identify a suitable firm, and after researching some
7 candidates I identified BTO LLP Solicitors. I believed
8 they would be best suited as they employed number of
9 former Procurators Fiscal and had an office in Glasgow.
10 I recall that I informed Jarnail Singh in POL Legal
11 Services and I believe he contacted them and made
12 arrangements for them to advise me on Scottish cases."

13 When you say it was recognised by Post Office Legal
14 Services that they weren't knowledgeable about Scots
15 Law, do you mean that there were no Scottish qualified
16 lawyers within the Criminal Law Team?

17 **A.** Correct.

18 **Q.** Is it right, therefore, that before to managing to gain
19 approval for BTO Solicitors to advise on Scottish cases
20 in -- would it have been 2013 --

21 **A.** From that document, I believe it was.

22 **Q.** -- the Criminal Law Team was providing a decision on
23 whether a case should be passed to the Crown Office and
24 Procurator Fiscal Service without being qualified in
25 Scottish law?

43

1 corroboration of evidence under Scots Law affect the
2 investigations that you carried out in Scotland?

3 **A.** Sorry, could you repeat that, please?

4 **Q.** You've discussed at this paragraph the requirement for
5 two sources of evidence, so corroborative evidence. How
6 did this requirement in Scotland impact upon the
7 investigations you carried out in Scotland, as opposed
8 to those in England and Wales?

9 **A.** If you could only draw evidence from, for instance, the
10 Horizon data and there was no supporting evidence, then
11 you couldn't proceed with a case.

12 **Q.** Whereas, in England and Wales, Horizon data alone would
13 be sufficient, would it?

14 **A.** I believe so.

15 **Q.** Turning, please, to the change in the process for
16 investigations in Scotland to allow for the involvement
17 of a Scottish firm to solicitors, could we have on
18 screen, please, paragraph 21 of the statement. That is
19 page 7. At paragraph 21, you say this:

20 "In my performance review for 2013/14, at
21 POL00105145, I refer (at pages 3 and 4) to some work
22 I did to secure specialist legal advice for Scottish
23 casework, when Scottish cases were submitted to POL
24 Legal Services for review. It was recognised within POL
25 Legal Services and the Security Team that they weren't

42

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

2 **Q.** Did that concern you at the time?

3 **A.** It did concern me more when I was on my own in Scotland,
4 so I'm about -- end of 2008/2009, possibly. I was the
5 only Investigator and I just felt as if, at times,
6 I would pass a case down to the Criminal Law Team and
7 there wasn't a full understanding of Scots Law. I did
8 approach the subject, prior to 2013, requesting if we
9 can get anyone but it just wasn't forthcoming at that
10 time. I can't recall the dates when I did that.

11 **Q.** Can you recall how long before 2013 you raised that?

12 **A.** Possibly a couple of years. I just -- I can't be
13 certain.

14 **Q.** Can you recall who you raised it with?

15 **A.** It would be my line management, first and foremost.

16 **Q.** Who, in particular, was that?

17 **A.** It was whoever was my line manager at that time. It may
18 have been Andrew Daley, it may have been after him.

19 **Q.** When you did raise it, what was the response?

20 **A.** I can't recall what the response was but we just didn't
21 get Scottish lawyers on board.

22 **Q.** Did BTO's involvement have any impact upon of the volume
23 of recommendations to the Crown Office and Procurator
24 Fiscal Service to prosecute?

25 **A.** As in did it increase the number we sent?

44

1 Q. Either way, whether it increased or decreased?
 2 A. It gave a more informed decision on whether it should go
 3 forward or not.
 4 Q. Do you consider that Post Office Investigators in
 5 Scotland were not adequately supported prior to the
 6 appointment of BTO Solicitors to advise in 2013?
 7 A. Yes.
 8 Q. Turning, please, to your relationship with the Crown
 9 Office and Procurator Fiscal Service, did you have
 10 a particular point of contact at the Crown Office and
 11 Procurator Fiscal Service?
 12 A. No.
 13 Q. Were you ever asked, following submission of a case to
 14 the COPFS, to conduct further enquiries?
 15 A. Yes.
 16 Q. What kind of further enquiries would you be asked to
 17 conduct?
 18 A. There are some documents that I was provided with that
 19 would be able to detail that. I can't think at this
 20 moment in time. It may be -- latterly, it was in
 21 regards to Horizon. It -- one of the main things they
 22 asked was "When was the money first taken?" or "When was
 23 it stolen?" and you had to provide an answer to that,
 24 and any information you could give.
 25 Q. So, setting aside what happened after the Second Sight

45

1 Q. Did you observe any differences in how the Criminal Law
 2 Team approached prosecutions, when compared with the
 3 Crown Office and Procurator Fiscal Service?
 4 A. Sorry, could you clarify?
 5 Q. For example, in terms of the decision to prosecute, did
 6 you observe any difference in approach between the
 7 Criminal Law Team in cases in England and Wales and the
 8 approach of the Crown Office and Procurator Fiscal
 9 Service in Scotland?
 10 A. I'm sorry, my mind's gone blank here. I don't think
 11 there was any differences in approach that I can think
 12 of. If any further evidence was required, then they
 13 approached ourselves in regards to that.
 14 Q. Did you observe any difference in terms of consideration
 15 of public interest factors?
 16 A. Not that I'm aware of.
 17 Q. Did you observe any differences in terms of lines of
 18 inquiry to be pursued?
 19 A. I would say the Procurator Fiscal was probably more
 20 direct because it didn't have an understanding of the
 21 workings of the Post Office.
 22 Q. Did you observe any differences in terms of approach to
 23 disclosure, over and above the technical differences in
 24 disclosure obligations?
 25 A. Not that I'm aware of.

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1 Report and just looking back previously to that, you've
 2 given those examples of dates on which money went
 3 missing. Are there any examples that you have for that
 4 earlier period about pinpointing dates, other than
 5 those?
 6 A. Sorry, could you repeat the question?
 7 Q. You've given the example of being asked about this
 8 specific date on which money went missing. Were there
 9 any other type of enquiries, prior to Second Sight's
 10 review from the Crown Office Procurator Fiscal Service,
 11 and what type of enquiries were you asked to conduct?
 12 A. I'm trying to recall specifically because I can't --
 13 there's none that come to mind at this moment in time.
 14 They may request a further statement from someone from
 15 a witness, that could be an example. In regards
 16 a product, I can't think of anything at this moment in
 17 time.
 18 Q. Did they ever ask you to obtain audit data from Fujitsu
 19 prior to the point of Second Sight's review?
 20 A. I can't recall if they did or not.
 21 Q. Before the Second Sight Report, were you ever asked
 22 about reliability of the Horizon system data in any
 23 cases you had submitted to the Crown Office and
 24 Procurator Fiscal Service?
 25 A. I can't recall.

46

1 Q. You say at paragraph 14 of your first statement that
 2 each year, all managers within the Post Office have to
 3 complete a six-month and annual performance and
 4 development review. You've been referred to your
 5 performance and development review for 2013 to 2014 by
 6 the Inquiry and you've commented on that in your
 7 statement.
 8 More recently, the Inquiry has provided you with
 9 copies of one-to-one meetings with your line manager,
 10 Andrew Daley, from 2009. Have you had a chance to look
 11 through those 2009 and 2010 documents?
 12 A. I did.
 13 Q. I'd like to look, first, to those one-to-one line
 14 manager meetings with Andrew Daley. Could we have on
 15 screen, please, POL00333405. This document relates to
 16 a meeting on 9 November 2009 covering the period of the
 17 last three months.
 18 Under "Update priorities met", it says:
 19 "The following requirements/action points have been
 20 met ...
 21 "1. Taken over Raymond's ex-cases, and have
 22 registered these via the SRA system, progressing towards
 23 PF ..."
 24 Is that Procurator Fiscal?
 25 A. It is, yes.

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1 Q. "... prosecution."
 2 In the box below there are some comments from
 3 Mr Daley, which read as follows:
 4 "Following my meeting with Robert, I found that he
 5 is a motivated member of the Security Team. He has
 6 taken over some difficult cases from Raymond. One case
 7 is fairly intricate and has taken to bring to fruition.
 8 None of Raymond's cases were reported to the PF, so
 9 Robert is under pressure to register them with the PF
 10 (online) and progress them to the point of prosecution.
 11 He is doing very well processing the stagnant cases and
 12 the fruits of his labour will show in the New Year,
 13 although PF cases take ages to prosecute, once it's
 14 handed over to the PF. Robert also has [very] good
 15 ideas and is very motivated. Robert took the
 16 opportunity to liaise with the PF and establish whether
 17 the PO Fraud Strand can assist them with the a different
 18 type of report, etc. He is awaiting a date to meet with
 19 the PF. It is also clear that he has a good working
 20 relationship with his local CM, Brian Trotter."
 21 Pausing there, who was Brian Trotter.
 22 A. He was the Contracts Manager for Scotland along with
 23 Robert Finlay.
 24 Q. Mr Daley goes on:
 25 "Robert has at least double the amount of cases, due
 49

1 is that right?
 2 A. That's correct.
 3 Q. Did you feel under pressure to refer these cases to the
 4 Procurator Fiscal, given the apparent backlog and the
 5 fact that you were the only Investigator in Scotland?
 6 A. I'm not sure how I felt at the time, to be honest with
 7 you. I know -- and I can't recall all the cases that
 8 were there or how many it was, I couldn't really say how
 9 I felt at the time.
 10 Q. Did you feel that the Investigation Team in Scotland was
 11 understaffed?
 12 A. Yes.
 13 Q. Did this have an impact on the quality of your
 14 investigations?
 15 A. I don't think so, no.
 16 Q. The next box at the bottom deals with "Progress against
 17 Personal Objectives, and the first column sets out the
 18 relevant objective, if we can go over the page,
 19 please -- and going over one more page, please, to the
 20 top there. We can see an objective:
 21 "Recovery of 40% of monies from investigations
 22 conducted to have a positive return rate against
 23 investigation element of team."
 24 In the next column, which deals with "Progress since
 25 last meeting", it says:
 51

1 to volume of cases raised in Scotland and the size of
 2 Scotland. Robert is the only Investigator in Scotland.
 3 This has placed him under some pressure but he is coping
 4 well. Robert has such a good relationship with the CMs
 5 and other [Post Office] staff, these cases find their
 6 way to him, once detected. I will get the rest of the
 7 team to also take on more workload in the Scottish
 8 region, so that Robert is not overloaded."
 9 You have referred in your second statement to you
 10 and Raymond Grant being the only Investigators in
 11 Scotland in 2008; is that right?
 12 A. Yes.
 13 Q. It appears that, by this point, in November 2009, you
 14 were the only Investigator in Scotland; is that right?
 15 A. Yes.
 16 Q. Why had none of Mr Grant's cases been reported to the
 17 Procurator Fiscal; can you recall?
 18 A. I've no idea.
 19 Q. Did you review these cases before passing them to the
 20 Procurator Fiscal's office?
 21 A. I can't recall which stage of the investigation those
 22 cases were at. They may have been ready just to be
 23 reported, they may not have. I can't recall.
 24 Q. This point in time in November 2009 was before you had
 25 had the benefit of any advice from Scottish solicitors;
 50

1 "Exceeding target, see Excel data attached."
 2 Is this a reference to recovery of monies from those
 3 who were prosecuted, whether by way of confiscation
 4 proceedings or civil recovery?
 5 A. It may not just have been for prosecutions. It may have
 6 been those that weren't prosecuted.
 7 Q. Is it right that, as an Investigator, you were set
 8 a target for recovery of monies from those who were
 9 investigated?
 10 A. Yes.
 11 Q. Was your performance measured in part against your
 12 target?
 13 A. Not as a whole. When you investigated someone, you
 14 would ask if they were in a position to repay the money.
 15 Not everyone was. So it would have been part of the
 16 personal development review but not as a whole.
 17 Q. If you had not met your target of recovery of
 18 40 per cent of monies from investigations conducted,
 19 would you have been marked down?
 20 A. Not necessarily. It all depends on how you performed in
 21 the other parts of your objectives.
 22 Q. It appears from this document that you exceeded your
 23 target for this period. How was that rewarded, if at
 24 all, by Post Office?
 25 A. It wasn't. It was just part of my targets.
 52

1 Q. Going over the page, please, we can see the next box is
 2 "Review of Behaviours/Action", and, going over the page
 3 again, please, there seemed to be some examples. Are
 4 these examples given by you?
 5 A. Yes, they are.
 6 Q. The third example says this:
 7 "Earlston PO. Took on case from colleague. Advised
 8 Procurator Fiscal on analysis of Horizon information.
 9 Unfortunately she deemed insufficient evidence for
 10 theft. Discussed a charge of 'Uttering' ..."
 11 Can you help with what "uttering" is?
 12 A. I couldn't tell you the legal term but "uttering" is
 13 basically to produce something you know to be false.
 14 Q. "... as postmaster that had repaid £3,000. This was
 15 considered and accepted. Awaiting outcome of plea from
 16 defence."
 17 A. Yeah.
 18 Q. You were providing here an example of you analysing
 19 Horizon information. Can you help with what analysis
 20 you would have been doing?
 21 A. I can't recall that. It may have been information that
 22 was already in the case file when I took it over.
 23 I don't recall doing any further work on that case file.
 24 I believe it was already with the Procurator Fiscal and
 25 it may have been assistance the Procurator Fiscal was

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1 Horizon wasn't, then they would consider that to be
 2 insufficient evidence because one doesn't help the
 3 other, if you --
 4 SIR WYN WILLIAMS: So there had to be two independent pieces
 5 of evidence, yes?
 6 A. Yes.
 7 SIR WYN WILLIAMS: Yes.
 8 MS PRICE: Mr Daily, being aware of the need for
 9 corroborative evidence of Horizon data, were there still
 10 cases being put forward to the Crown Office and
 11 Procurator Fiscal Service relying solely on Horizon
 12 data?
 13 A. You say "solely" as in the only evidence?
 14 Q. As in there was not corroborative evidence, there wasn't
 15 a second source. The reason I ask, Mr Daily, is it
 16 would appear, on one reading of this, that there was
 17 analysis of Horizon information that was put forward to
 18 the Procurator Fiscal's office and it was deemed
 19 insufficient evidence for theft.
 20 So my question is: notwithstanding the need for two
 21 sources, were cases still being put forward with one
 22 source, Horizon data?
 23 A. No, they wouldn't have been put forward as one source.
 24 You'd have put more than one production in, in regards
 25 to the -- whether it was a theft or embezzlement. You

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1 requesting, in -- regarding Horizon information
 2 disclosed.
 3 Q. Where you were doing analysis of Horizon information,
 4 were you analysing printouts from the branch, from the
 5 Horizon system, or audit data obtained from Fujitsu, or
 6 both?
 7 A. I don't recall. I couldn't honestly tell you.
 8 Q. You appear here to have been dissatisfied with the
 9 Procurator Fiscal's decision that there was insufficient
 10 evidence of theft based on the Horizon data. Was this
 11 an issue that came up frequently in Scotland, that
 12 Horizon data alone would be deemed insufficient to prove
 13 theft?
 14 A. I'm not too sure if that was just due to the Horizon
 15 information. That may not have been that. It may have
 16 been other evidence as well. I honestly could not say
 17 if that was just down to Horizon information. I don't
 18 recall.
 19 SIR WYN WILLIAMS: I'm not trying to be too legalistic about
 20 this but Horizon information alone would not be
 21 sufficient, would it, if there's a requirement for
 22 corroboration?
 23 A. That's correct. If they were relying on Horizon and
 24 another piece of evidence, whatever that evidence was,
 25 and they felt the other piece was sufficient but the

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1 would provide the documents to the Procurator Fiscal.
 2 The Procurator Fiscal, as with exhibits, would look at
 3 those productions and, if it was two of those
 4 independent sources were sufficient to proceed to
 5 a prosecution, he would take them forward. If there
 6 wasn't, then the case would be dropped. You wouldn't
 7 just be putting forwards the Horizon data itself, on any
 8 case.
 9 Q. Could we have on screen, please, POL00333406. This is
 10 another one-to-one meeting, record of a meeting between
 11 you and Mr Daley, Andrew Daley. It relates to a meeting
 12 on 4 February 2010 by telephone, relating to the
 13 previous three months. Mr Daley's comments are recorded
 14 in box 3 and read as follows:
 15 "Robert remains one of the top investigators in the
 16 Fraud Strand. His keen attitude and commitment is
 17 exemplified in the prosecutions and especially the
 18 recovery of the loss, (see spreadsheet). Robert is
 19 always willing to assist there he can even if this means
 20 that he has to travel long distances or work long hours.
 21 He has a can do attitude and looks at all the avenues
 22 nor to prosecute a case but he is also mindful of the
 23 Scottish regional system and the various regional PF
 24 idiosyncrasies.
 25 "I am concerned that Robert is trying to do too much

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1 in Scotland, and get bogged down. If a wave of Scottish
2 cases arise, (New Horizon rollout findings) these will
3 need to be allocated to other investigators who must
4 attend to them, without Robert assisting (taking
5 statements, etc), otherwise he will just get bogged down
6 with their work."

7 The reference here to you looking at all avenues to
8 prosecute a case, you say in your first statement at
9 paragraph 64 that you played no role in relation to
10 prosecution decision making. It might appear from that
11 comment that you were actively trying to secure
12 prosecution decisions from the Crown Office and
13 Procurator Fiscal Service; is that right?

14 **A.** No, that's not correct at all. I can see how that looks
15 but I'm not sure why my line manager at the time, Andrew
16 Daley, wrote it that way, because all I can do is take
17 a case, look at all the evidence and, if there's
18 sufficient evidence at that time to put it forward to
19 the Procurator Fiscal, that's what I did, and it's the
20 Procurator Fiscal -- you can't persuade a Procurator
21 Fiscal to prosecute. They make that decision
22 independently.

23 **Q.** Can you help with why you needed to be mindful of the
24 Scottish legal system and the various regional
25 Procurator Fiscal's idiosyncrasies?

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1 through stakeholder engagement, technical elements of
2 inquiries are effectively deployed -- (searches of
3 persons/premises).

4 "Ensuring full engagement with FIs ..."

5 Is that Financial Investigators?

6 **A.** It is, yes.

7 **Q.** "... and police contacts optimising POCA powers to
8 achieve maximum possible recovery (eg monetary
9 recovery/asset recognition).

10 "Ensure all intervention measures are adopted to
11 recover stolen funds."

12 It appears here that the target for loss recovery
13 has increased since the 2009 one-to-one meeting record
14 we looked at. Then you were over target, at
15 40 per cent, and here the objective is 65 per cent. Is
16 that right, that the target was increased by the Post
17 Office?

18 **A.** I believe that target was increased after I was sent
19 a document with my objectives for 20 -- I can't remember
20 if it was '12 to '14 or '11 to '12, and it was the same
21 figure of 65 per cent on it. It was increased at some
22 point, yes.

23 **Q.** Why was it increased?

24 **A.** I can only think it was because of the amount of losses
25 the Post Office was suffering.

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1 **A.** I'm not sure why he wrote that either. I don't
2 understand what he was talking there -- talking about.

3 **Q.** Does the reference to the new Horizon rollout here refer
4 to the rollout of Horizon Online?

5 **A.** I believe it would have been, if that's when it was
6 rolled out in 2010.

7 **Q.** Was it expected that there would be a wave of cases
8 following its rollout?

9 **A.** They were sending not just Auditors, I think it was
10 trainers, in to do cash checks prior to Horizon Online
11 going in. From what I recall, they thought there may be
12 a lot of cash shortages identified when this was getting
13 done.

14 **Q.** Could we have on screen, please, POL00105025. This
15 document is the individualised objectives for Security
16 Team members for 2013 to 2014. The objectives for you
17 are set out on pages 128 to 129. Could we go to
18 page 128, please. We can see your name and the first
19 two boxes on this page refer to core behaviours.

20 Just scrolling down, please, then over to the next
21 page, the third objective is:

22 "To ensure a robust approach to fraud loss recovery
23 with a return rate of 65%.

24 "Activity to include:

25 "Ensure that evidence opportunities are maximised

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1 **Q.** Was this target indicative of the recovery of funds from
2 those being investigated being a high priority within
3 the Post Office?

4 **A.** Sorry, can you clarify what you mean there?

5 **Q.** This target, and the fact that it had been increased, is
6 that indicative that the recovery of funds from those
7 being investigated was a high priority within the Post
8 Office?

9 **A.** It was never looked upon as that when we received our
10 targets or objectives but it would suggest it was.

11 **Q.** Was this a target set for all Post Office Investigators?

12 **A.** Yes.

13 **Q.** It was a target you were aware of because it was part of
14 your performance objectives?

15 **A.** Yes.

16 **Q.** Do you think this ever influenced the conduct of
17 investigations you were charged with?

18 **A.** No.

19 **Q.** Could we have on screen, please, POL00105145. This is
20 a record of your one-to-one performance review with
21 Helen Dickinson for the year 2013/14. If we can go over
22 the page, please, we see "Reviewee", you, and "Review
23 Owner", Helen Dickinson. Was the purpose of the
24 performance review to review performance against the
25 objectives which had been set?

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1 A. Yes.

2 Q. Could we go, please, to page 2 of this document. Well,
3 we're on page 2, in fact, so about halfway down the
4 page. You say about halfway down:
5 "My PDR is completed to timescale ..."

6 A. Yes.

7 Q. Then there's a hashtag 160:
8 "I have achieved an 86% recovery (£68,733) in my
9 cases."
10 So it appears from this that you had exceeded your
11 65 per cent target; is that right?

12 A. That's correct.

13 Q. To repeat a question I asked before, how was meeting
14 this objective at this stage rewarded by the Post
15 Office?

16 A. I understand where this is coming from, where we had
17 been given bonuses for recovering money. It was part of
18 our objectives to do so, it didn't necessarily rely on
19 a bonus. We received a bonus every year, regardless.

20 Q. The bonuses that were received, for whatever reason,
21 were those individual bonuses or team bonuses?

22 A. No, they were individual bonuses in how you performed
23 over the year, if you've performed better than someone
24 else. So, technically, you could say this went towards
25 but if you speak to individuals within the Investigation

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1 Scotland FIs are no longer to be used as a Debt
2 Collecting Agency for external business. I have set up
3 and attended an initial meeting with Police Scotland and
4 Post Office Limited FI ..."

5 Then we have the same set of symbols:
6 "The meeting discussed how POL can access recovery
7 from POCA through a complicated legal system. I am
8 currently engaging with the Scottish Business Resilience
9 Centre to ascertain if there are any agreed protocols
10 concerning other Government bodies utilising POCA
11 powers. This is an issue that has never been progressed
12 like the rest of the UK and I am determined to progress
13 this as far as possible to ensure POL Scotland have the
14 same recovery procedures and support as in the rest of
15 the UK.
16 "This continues to be a work in progress and SBRC
17 are making enquiries to assist POL. I have discussed
18 with BTO Solicitors regarding running a civil case
19 alongside the criminal case to ensure that POL are at
20 the forefront of creditors. A draft is being worked on
21 by BTO to be put to POL for consideration. I am taking
22 all steps to ensure POL can recover funds from
23 subpostmasters."

24 When you say, "The Crown Office had deemed that
25 Police Scotland [Financial Investigators] were no longer

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1 Team, the Investigation Managers, it was always
2 considered an unfair target because any inquiry you did,
3 any case you did, all you could say to the person, "Were
4 you in a position to repay the money?" If that person
5 didn't have the money, you couldn't get blood out of
6 a stone.

7 Q. Could we go page 4 of this document, please, about
8 two-thirds of the way down the page is a heading
9 "Financial Investigators". Under this heading, you say
10 this:
11 "I have long recognised that an FI [Financial
12 Investigator] is required for Scotland as the Crown
13 Office has now deemed that Police Scotland FI ..."
14 Can you help with that, "rsquo;s"?
15 A. Unfortunately, it was a system we put it into, when we
16 printed it out, as you can see with 160 plus hashtag ...
17 Q. Is that Police Scotland --
18 A. That's a pound --
19 Q. -- FIs?
20 A. It's FI and it's Police Scotland Financial
21 Investigation -- Investigators, and there was another
22 name. I can't recall what the other name was but it was
23 just to Scotland Financial Investigators.
24 Q. So:
25 "... the Crown Office has now deemed that Police

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1 to be used as a Debt Collecting Agency for external
2 business", does this mean that this is how Police
3 Scotland Financial Investigators had been viewed, at
4 least by the Post Office, prior to this?
5 A. I don't believe that's how they were viewed by the Post
6 Office and I don't think that was in regards to the Post
7 Office, that statement coming out.
8 Q. How did the Crown Office convey this stance to the Post
9 Office?
10 A. I can't recall how it was conveyed.
11 Q. What did you propose, insofar as you can recall, in
12 relation to the use of POCA when you met with Police
13 Scotland?
14 A. I think it was to ask them about their powers in the
15 recovery of assets or basically cash, and I'm sure that
16 in Scotland you need to -- and I could be wrong --
17 a Section 3, and if -- none of the Financial
18 Investigators had a Section 3. I can't recall what was
19 fully discussed but I think it was along those lines.
20 Q. You appear to attach significant importance to this
21 issue in your performance review; is that fair?
22 A. When you write a performance review, you are flowering
23 things up to make it look good, in fairness, and when
24 I say it was the main thing, the main issue for me, it
25 wasn't, as such -- what I did recognise was in England

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1 and Wales there was Financial Investigators making
 2 recoveries, and I took it with BTO Solicitors, and it
 3 was another avenue to look at in regard to a civil case
 4 and how we can recover any losses to the Post Office.

5 **Q.** Was this issue something you understood to be of
 6 significant importance for Senior Managers within the
 7 Security Team?

8 **A.** Yes, if they were going to put a 65 per cent recovery on
 9 it, then they had to view Scotland the same as everyone
 10 else.

11 **Q.** You refer in your first statement to a financial
 12 evaluation form.

13 **A.** Yes.

14 **Q.** Could we have paragraph 18 of Mr Daily's first statement
 15 on screen, please. It is page 6 of the first statement.
 16 At paragraph 18 you say this:

17 "In my CV ... I mention the Financial Evaluation
 18 form. Following an interview with a suspect, I was
 19 required to complete a Financial Evaluation Sheet. This
 20 detailed the suspect's name, the Post Office branch and
 21 what they had said about the loss; the form also
 22 recorded my opinion on the loss and any financial
 23 details given by the suspect, including how they
 24 intended to repay any monies. Although I had to
 25 complete the form for Scottish cases, it was recognised

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1 indication as to the title of the piece is "Postmistress
 2 who stole 75,000 to pay back just 1."

3 Then going back up, please, to Ms Topham's email to
 4 you, she says:

5 "One of my other cases!! Something to cheer you
 6 up!!"

7 What discussions had you had with Ms Topham about
 8 this case, about the Seema Misra case, if any?

9 **A.** I've no idea because it wasn't my case. I can only
 10 think that we had to inform the Former Agents Debt Team
 11 if we'd got a recovery, from what I recall, and, if
 12 I had informed her that on a case that we hadn't got
 13 a recovery, she may have just sent this to me because
 14 she wasn't getting in any -- they weren't getting any
 15 recovery from that one as well.

16 Why Zoe sent it to me -- I can't recall why she sent
 17 it but the *Misra* case was not one of my cases.

18 **Q.** Okay.

19 Can you offer any insight into why she thought this
 20 was something that might cheer you up?

21 **A.** I think that was a sarcastic comment.

22 **Q.** That document can come down now. Thank you.

23 Moving, please, to ARQ data requests. You say in
 24 your first statement at paragraph 19 that cases had to
 25 be submitted within appropriate timescales and that you

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1 that POL Financial Investigators did not have the
 2 authority to conduct a financial investigation in
 3 Scotland."

4 Was this form part of the strategy for recovery of
 5 monies from those being investigated?

6 **A.** Yes, it was.

7 **Q.** Was the purpose of this form to assess the chances of
 8 recovery of monies?

9 **A.** Yes.

10 **Q.** So this form, just to be clear, was not a way of trying
 11 to follow the money, so to speak, to establish whether,
 12 for example, theft had occurred?

13 **A.** No, the form itself was -- sorry, the form itself was to
 14 try and obtain information on what assets a suspect had
 15 and it was passed to Financial Investigators to then
 16 follow that through.

17 **Q.** Just one more document on this topic, please, could we
 18 have on screen, please, POL00057678. This is an email
 19 from Zoe Topham to you, dated 3 March 2012. Apologies,
 20 that may be the wrong way round, looking at the email
 21 below. I think that may be 3 May -- scrolling up,
 22 please -- 3 May 2012. It forwards a link, originally
 23 sent by Alison Bolsover to you which appears, scrolling
 24 down, please, to be a news article relating to the Seema
 25 Misra case, and it's www.getsurrey.co.uk/news, and the

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1 believe this may have been 12 days from the interview of
 2 a suspect; is that right?

3 **A.** Yes.

4 **Q.** Was that the case for both England and Wales and
 5 Scotland?

6 **A.** Yes.

7 **Q.** So by 12 days post-interview, you were expected to have
 8 filed your investigation report with the Criminal Law
 9 Team; is that right?

10 **A.** You had to at least provide an interim report, if
 11 I recall, because you may not have conducted all your
 12 inquiries.

13 **Q.** Is it fair to say you had limited time to conduct
 14 inquiries before you submitted at least an interim
 15 report?

16 **A.** Yes.

17 **Q.** Did you ever request ARQ data from Fujitsu in
 18 an investigation before you submitted your interim or
 19 final investigation report to the Criminal Law Team,
 20 ie within that 12-day time frame?

21 **A.** I may have. There may have been occasions when I didn't
 22 and that was recorded in the interim report that had
 23 been requested. You had to -- you would not have got
 24 the ARQ data back within 12 days, from what I recall, so
 25 it would -- if there was any mention, it would be that

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1 you'd requested it.

2 **Q.** In terms of the circumstances in which ARQ data was
3 sought from Fujitsu, could we have on screen, please,
4 paragraph 89 of Mr Daily's first statement. It is
5 page 24. At paragraph 29, you say this:
6 "Paragraph 29 of the Request asks ARQ data requested
7 from Fujitsu as a matter of course when a shortfall had
8 been identified and the relevant SPM/SPM's manager(s) or
9 assistant(s)/Crown Office employee(s) attributed the
10 shortfall to problems with Horizon."
11 In response to that question, you say:
12 "ARQ data was not requested from Fujitsu as a matter
13 of course. It would any have been requested if it was
14 relevant to an enquiry."
15 In what circumstances would ARQ data have been
16 considered relevant to an inquiry?
17 **A.** It may have been in relation to what we call giro
18 suppression, suppression of someone's bank statements.
19 If it was suspected they were paying money into a bank
20 account -- or it could be a card account enquiry, where
21 you tend to find it was elderly people, a member of the
22 family had noted that there was money being taken from
23 their account and the person had approached a counter
24 and was told that the PIN wasn't working and to put the
25 PIN in again, and the postmaster was suspected of

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1 alone, so to speak, would request ARQ data where you
2 thought it might support the prosecution case?
3 **A.** Yes, sir.
4 **SIR WYN WILLIAMS:** If the suggestion was that it might
5 undermine it, you would send it up the line; is that it?
6 **A.** You would include it in the report but you would --
7 I would likely request a statement from Fujitsu in
8 regards to whether there was issues at that branch.
9 **SIR WYN WILLIAMS:** Right.
10 **A.** That would go with the -- that would be requested
11 through, along with the ARQ data at the time, sir.
12 **MS PRICE:** Could we go over the page, please, to
13 paragraph 92. In this paragraph, you are addressing
14 an email in which you requested audit data from Fujitsu
15 and you say in this paragraph that you would only
16 contact Fujitsu if it was specifically required for
17 a case.
18 Do you mean by this that you would only contact
19 Fujitsu if you were asked to by someone else?
20 **A.** I recall, if I remember correctly, after viewing the
21 documents, I'd received a statement from Andy Dunks from
22 Fujitsu. I needed a signed copy of that statement and
23 I went direct to him, only because I'd been copied in on
24 an email with his details on it. That was in relation
25 just to getting a statement signed, I believe that's

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1 stealing the second amount. So you'd be looking for ARQ
2 data to see and request the card details for that, that
3 person's account.
4 And that would tell you when -- how many
5 transactions were done out of that card account at
6 a time.
7 **Q.** Did you ever request ARQ data with the purpose of
8 investigating a suggestion by a subpostmaster or
9 assistant or manager or an employee of the Post Office,
10 that the Horizon system was the cause of an apparent
11 shortfall?
12 **A.** In relation to it just being -- that being the problem,
13 I don't recall it just being in regards to that because
14 if there was a -- if they suggested it was a problem
15 with Horizon, then it would be put into the report to be
16 submitted up to the line manager and forwarded on, and
17 I would expect that to be followed through by -- then by
18 Fujitsu. The ARQ data would be, I can only think, in
19 relation to a product we may believe that money was paid
20 into or as I stated previously.
21 Sorry, I should add to that, if someone had said it
22 was Horizon data, we would have requested a statement
23 from Fujitsu.
24 **SIR WYN WILLIAMS:** So the impression I'm getting, and
25 correct it if I'm wrong, Mr Daily, is that you acting

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1 what that was. Otherwise, any request for Fujitsu,
2 including statements, went through the Post Office
3 Security Team or the Casework Team, as it was.
4 **Q.** I'd like to turn, please, to the investigation and
5 prosecution of Peter Holmes. You deal with this case at
6 paragraphs 97 to 132 of your statement. It's right,
7 isn't it, that you interviewed Mr Holmes following the
8 identification of an apparent shortfall by an audit
9 conducted in September 2008 at the Post Office branch
10 which he managed?
11 **A.** Yes.
12 **Q.** You also completed an investigation report, in fact two
13 investigation reports, an interim one and a final one --
14 **A.** Yes.
15 **Q.** -- which were submitted to the Criminal Law Team, and
16 you completed a schedule of non-sensitive unused
17 material in the case, saying in your first statement to
18 the Inquiry that you were the Disclosure Officer in the
19 case; is that right?
20 **A.** That's correct.
21 **Q.** Starting, please, with the interview of Mr Holmes on
22 19 September 2008, could we have the report of tape
23 recorded interview on screen, please. It is
24 POL00050208. We can see, on the face of this, that the
25 interview was on 19 September, the duration of the

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1 interview was 45 minutes. You were listed as the
 2 Interviewing Officer and Christopher Knight was the
 3 Second Interviewing Officer; is that right?
 4 **A.** That's correct.
 5 **Q.** Going to page 2, please, about halfway down the page,
 6 you asked about Mr Holmes' experience with Horizon and
 7 you say:
 8 "And your experience with Horizon how would you rate
 9 it?"
 10 Mr Holmes' response was:
 11 "Very slow it's okay, it's an Auditor's tool, that
 12 particular one we had problems with because it was
 13 connected to a telephone line that also had the fax
 14 machine connected to it.
 15 **"Question:** What one's that Jesmond?
 16 **"Answer:** Jesmond and we had BT engineers in looking
 17 at the line, we had Horizon engineers in looking at the
 18 line and eventually we had to take the fax machine out
 19 throw it away and get a new one in provided by Mr Khanna
 20 and now ..."
 21 Mr Khanna was the subpostmaster; is that right?
 22 **A.** Yes.
 23 **Q.** "... and now it seemed to work but there was a time
 24 there when it wasn't so slow, it wasn't so good. People
 25 using cards just weren't getting through.

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1 at it and they found that there was 2 cash declarations
 2 made and 1 was well out and at the end of the out 46,000
 3 odd was missing."
 4 You give the exact figure there, and he says:
 5 "Yeah.
 6 **"Question:** So what can you tell me about the
 7 shortage then?
 8 **"Answer:** I've absolutely no idea.
 9 **"Question:** No idea?
 10 **"Answer:** Absolutely no idea unless it's the Horizon
 11 that's let us down, I mean there's no one in there
 12 stolen 46,000 I haven't got it it's not in my bank
 13 account I spent too many years in the police force
 14 seeing things go wrong to start stealing money from
 15 anybody. I just, I really do not know."
 16 **"Question:** Why is there 2 cash declarations then?"
 17 **"Answer:** There was 1 in because I knew that we were
 18 showing short and I covered it up.
 19 **"Question:** Covered what up?
 20 **"Answer:** The fact that we were short in cash.
 21 **"Question:** How much by?
 22 **"Answer:** Not that much erm I can't remember the
 23 exact figure.
 24 **"Question:** Roughly?
 25 **"Answer:** It started off as 4 or 5,000.

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1 **"Question:** What period was that?
 2 **"Answer:** I suppose 9 months alleged for 3 months."
 3 So we're talking about the beginning of this year,
 4 December?
 5 "Yeah I'm not very good with times but yes
 6 possibly."
 7 Then:
 8 "PH states that they had engineers coming on over
 9 a 3-month period."
 10 Over the page, please, towards the bottom at 14.50,
 11 we then have a summary:
 12 "PH explains that the computer program is really
 13 slow at the end of the day taking up to 1 and half
 14 hours. He continued that Doreen leaves about 6.30 pm
 15 with him staying until 7.30 pm."
 16 Later in the interview, you ask Mr Holmes about the
 17 apparent shortage found on audit of just over £46,000.
 18 It's page 8 of this document, please, starting at 26.04.
 19 You ask:
 20 "Right okay well the situation here then Peter that
 21 the audit have come in on 18 September 2008 can you tell
 22 me what happened that morning?"
 23 **"Answer:** Yes Sunil let me in, give me the keys,
 24 they Auditors introduced themselves I looked at their
 25 passes went into the Post Office and let them have a go

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1 **"Question:** When was that?
 2 **"Answer:** Oh 6 or 9 months ago.
 3 **"Question:** When you said it started off 4 or 5,000
 4 what did it creep up to?
 5 **"Answer:** Well it's up to 46,000 now."
 6 So Mr Holmes was clear in saying that there had been
 7 problems with the Horizon system in the branch,
 8 necessitating the attendance of an engineer, wasn't he?
 9 The first part of the interview that we'd looked at.
 10 **A.** Yes.
 11 **Q.** He was suggesting here that the apparent shortfall might
 12 have been caused by the Horizon system, wasn't he?
 13 **A.** Yes.
 14 **Q.** You deal with this at paragraph 98 of your first
 15 statement. Could we have that on screen, please. It's
 16 page 27 of the first statement. At paragraph 98 you say
 17 this:
 18 "Paragraph 38 of the Request asks me if I was aware
 19 of any allegations made by Peter Holmes relating to the
 20 reliability of the Horizon IT System and, if so, what
 21 I thought the significance of this was. Mr Holmes
 22 indicated during interview that the loss may be down to
 23 the Horizon system. At the time, I don't believe
 24 I would have been aware of the significance of this, as
 25 I don't recall being aware of any issues with Horizon at

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1 the time. Mr Holmes said he couldn't explain the
2 losses, and [I] didn't believe anyone else in the office
3 had stolen [the] money."

4 In terms of what you did to investigate the issues
5 being raised by Mr Holmes, we are assisted to some
6 extent by an interim investigation report you completed
7 in October 2008. Could we have that on screen, please,
8 it's POL00050334. If we could go to the second page of
9 this document, please, it is only two pages, just
10 scrolling down to the bottom, we can see the date there,
11 6 October 2008. About halfway in the middle of this
12 page, you deal with Mr Holmes' account given in
13 interview, and can we scroll up a little, please. You
14 say:

15 "Mr Holmes denied theft of the money however
16 admitted false accounting over a period of no less than
17 9 months.

18 "Horizon data has been requested to ascertain when
19 Mr Holmes started producing false cash declaration and
20 subsequently false accounts.

21 "Mr Holmes made allegations the Horizon equipment
22 was faulty over a period of time in early 2008.

23 A request has been made to ascertain if this was the
24 case.

25 "These papers are submitted for the current position

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1 relation to the system?

2 **A.** Yes.

3 **Q.** Going, please, to page 7 of this document, the second
4 line down, you say this:

5 "Mr Holmes also made allegations the Horizon
6 equipment was faulty over a period of time in 2008.
7 This has been checked and the allegations are
8 unfounded."

9 Going further down the page, please, about
10 two-thirds of the way down:

11 "Mr Holmes has attempted to blame the Horizon system
12 on the shortages, however checks have revealed no
13 problems."

14 In relation to the checks that you referred to here,
15 you address this at paragraph 104 of your first
16 statement. Can we have that on screen, please, it's
17 page 28. At paragraph 104, you say this:

18 "Paragraph 44 of the Request asks me to consider my
19 investigation reports ... In particular, my report [that
20 is the interim report] refers to a request being made to
21 ascertain whether Horizon equipment at the Jesmond
22 branch was faulty. I note that at [your final report]
23 at page 7, my report suggest that checks had revealed no
24 problems with Horizon. I cannot recall what checks were
25 carried out in relation to Horizon at the branch, who

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1 to be noted."

2 So this was an interim investigation report, was it?

3 **A.** Yes.

4 **Q.** Focusing first on the request you say was made to
5 ascertain whether the Horizon equipment was faulty, you
6 revisit this in your final investigation report. Could
7 we have that on screen, please. It's POL00050832.
8 Going to page 8 of this document, please, which is the
9 last page, we can see that it is dated 30 January 2009.

10 Going back to page 3, please, the last paragraph on
11 this page. Scrolling down, please, right the way down,
12 please:

13 "Questions were put to Mr Holmes regarding the
14 [figure of the loss there] shortage discovered at audit.
15 Mr Holmes said the auditors found that there were two
16 cash declarations made and that one was around £46,000
17 out. Mr Holmes stated he had no idea what happened to
18 the money, adding it may have been the Horizon system.
19 He further stated nobody in the office had stolen the
20 £46,000. He then said he didn't have it, it wasn't in
21 his bank account. He further said he had spent too many
22 years in the police force seeing things go wrong, to
23 start stealing money from anyone."

24 So you put into your investigation report, didn't
25 you, the issues that were being raised by Mr Holmes in

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1 carried out the checks or what the results were. I've
2 considered all the documents and can't find anything in
3 relation to the request or the results of the checks."

4 As you note in your statement here, there is no
5 record that the Inquiry has been able to find to
6 evidence any request for checks to be carried out, what
7 any checks consisted of or what the result of any of
8 those checks were. No material was disclosed in the
9 course of the prosecution of Mr Holmes to show what
10 checks were undertaken or how they were said to refute
11 Mr Holmes' concerns about the Horizon equipment.

12 You completed the Schedule of Non-sensitive Unused
13 Material in Mr Holmes' case. Could we have that on
14 screen, please, it is POL00051527. Scrolling down to
15 the bottom, please, we can see the date of this, 19 May
16 2009, as well as your name.

17 If we can scroll up a little, so we can see the list
18 of material here, casting your eye down the list of
19 material contained in this schedule, is there anything
20 listed which you consider relates to the checks carried
21 out to ascertain whether the Horizon equipment was
22 faulty?

23 **A.** No.

24 **Q.** Any such material would have been disclosable in these
25 proceedings, wouldn't it?

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1 A. Yes.

2 Q. Would you accept that the absence of such material being
3 listed here reflects either a failure in the
4 investigation, ie a failure to properly investigate the
5 issues being raised by Mr Holmes and have those checks
6 carried out, or --

7 A. No -- sorry --

8 Q. -- a failure in disclosure on your part?

9 A. No, I can't say it does. As I stated in my second
10 statement, there would have been a list of exhibits and,
11 without that list of exhibits, I can't say for definite
12 what was disclosed to the Criminal Law Team. I would
13 not have put those comments into my final report if
14 I hadn't conducted them. I don't understand why there's
15 no paperwork there in relation to them. I have asked
16 for the Green file jacket, containing all the paperwork,
17 and I've not been able to obtain that. That would at
18 least give me some indication of how -- of what was
19 requested and what the result of those checks were.

20 MS PRICE: Sir, that marks a break in subtopics under the
21 case of Mr Holmes. I wonder if it might be convenient
22 to take an early lunch at that point until 1.50?

23 SIR WYN WILLIAMS: Yes, of course. So we'll break off for
24 lunch until 1.50.

25 MS PRICE: Thank you, sir.

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1 A. Yes, I have.

2 Q. Does that assist with whether there is anything on the
3 list of exhibits that would meet the description of
4 material relating to a request for checks on the
5 equipment at the branch, the nature of those checks or
6 the result of those checks?

7 A. No.

8 Q. Okay. Would you accept, therefore, having looked
9 through the Schedule of Unused Material and the list of
10 exhibits, that no material relating to any checks done
11 was, in fact, disclosed in the *Holmes* case?

12 A. That's correct.

13 Q. Would you accept that that reflects either a failure in
14 investigation relating to the checks or a failure in
15 disclosure in the case?

16 A. A failure in disclosure.

17 Q. In your interim investigation report, you said that
18 Horizon data had been requested in the case of Peter
19 Holmes and, in your final investigation report, you said
20 that Horizon data requested, covering the period
21 21 August 2007 to 17 September 2008, had been received
22 and analysed; is that right?

23 A. Yes.

24 Q. You say in your statement at paragraph 112 that you do
25 not believe you would have said the Horizon data had

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1 (12.51 pm)

(The Short Adjournment)

2 (2.15 pm)

3 MS PRICE: Good afternoon, sir, can you see and hear us?

4 SIR WYN WILLIAMS: Yes, thank you.

5 MS PRICE: Apologies for the slight delay in resuming. Sir,
6 you will recall just before lunch Mr Daily referred to
7 the list of exhibits in the *Holmes* case and needing to
8 see that before being sure what was disclosed to the
9 defence. We have, over lunch, been able to provide
10 Mr Daily with the list of exhibits. For various
11 reasons, I cannot display all of the parts of it on
12 screen but I can provide the URNs but Mr Daily has had
13 an opportunity to read those and I propose to ask him
14 a couple of short questions about that with your
15 permission, sir.

16 SIR WYN WILLIAMS: Yes, of course.

17 MS PRICE: Mr Daily, just before lunch you referred to the
18 list of exhibits in the *Holmes* case and not having had
19 the opportunity to see that. We have, over lunch,
20 provided you with four short documents which, together,
21 make up, as we understand it, the list of exhibits in
22 the case.

23 I should check first: have you had an opportunity to
24 read through those documents?

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1 been requested, received and analysed if this had not
2 been done; is that right?

3 A. That's correct.

4 Q. Could we have on screen, please, paragraph 132 of
5 Mr Daily's first statement, it is page 35. Towards the
6 bottom of the page, please, paragraph 132, you say:
7 "I have considered the Court of Appeal judgment, and
8 in particular paragraphs 226 to 230 relating to
9 Mr Holmes. I noted the finding at paragraph 229 that
10 ARQ data was obtained but that it was not clear if it
11 was disclosed. I acknowledge that ARQ data was
12 obtained, but cannot recall whether or not it was
13 disclosed. If it was not disclosed, I cannot now offer
14 a reason why that was."

15 You have confirmed in your statement that you were
16 the Disclosure Officer in Mr Holmes' case and we've been
17 through the Schedule of Unused Material and you've now
18 had the opportunity to see the list of exhibits. Is
19 there an item on either of those documents which would
20 fit the description of ARQ data obtained from Fujitsu?

21 A. No, there's not.

22 Q. Disclosure of any ARQ data would have been the
23 responsibility of the Disclosure Officer; is that right?

24 A. Yes.

25 Q. If any ARQ data obtained was not disclosed, this would

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1 have been a failure in disclosure, would it not?

2 **A.** Yes.

3 **Q.** Does it remain the case that you cannot offer a reason
4 as to why ARQ data was not disclosed, if it was not?

5 **A.** I cannot offer any reason for it. I don't understand
6 why it wasn't picked up by the Criminal Law Team.

7 **Q.** The Court of Appeal, in overturning Mr Holmes'
8 conviction, found that there was no investigation into
9 the integrity of the Horizon figures relied on by the
10 Post Office. When Mr Holmes raised the concerns he did
11 in interview, did you make any enquiries, whether of
12 fellow Investigators or those more senior in the
13 Security Team, as to whether others had experienced
14 unexplained losses in their branch accounts or were
15 attributing shortfalls to the Horizon system?

16 **A.** I don't believe I did. This was probably the first time
17 I'd actually heard anyone mention in interview that
18 there was a problem with Horizon or that they'd
19 encountered a problem with Horizon.

20 **Q.** Were you made aware, by this point, of the outcome of
21 the prosecution of Suzanne Palmer?

22 **A.** No, I wasn't aware of that.

23 **Q.** That was a case where Mrs Palmer was acquitted having
24 raised Horizon issues in her defence. Nobody had raised
25 that with you?

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1 Royal Mail has conducted a thorough investigation and
2 did not consider any alternative in relation to the
3 allegation.

4 "3. The accused takes issue with the prosecution
5 about these matters for the following reasons: no other
6 member of staff has been investigated. I have put
7 forward a full explanation of the money passing through
8 my joint Barclays Account."

9 Having had the opportunity to reflect on this case
10 in preparing to give evidence, would you accept that the
11 investigation conducted by you was not thorough, as is
12 suggested in this defence statement?

13 **A.** I would not have put in anything in my report if
14 I hadn't requested it and looked at it, and I understand
15 where you're coming from but I don't understand why it
16 wasn't disclosed -- wasn't on the list of exhibits.

17 **Q.** That document can come down, thank you.

18 In your final investigation report, you commented:
19 "I would see no reason why we should not proceed
20 with the prosecution of Mr Peter Anthony Holmes."

21 You say in your statement that you played no role in
22 decision making about prosecutions but it appears that
23 you did here offer a strong view on whether Mr Holmes
24 should be prosecuted; would you accept that?

25 **A.** Yes.

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1 **A.** No.

2 **Q.** Had anyone told you of any other cases where apparent
3 shortfalls were being attributed to the Horizon system
4 by this point?

5 **A.** Not that I recall.

6 **Q.** Could we have on screen, please, POL00052178. This is
7 Mr Holmes' defence statement in the case. In it,
8 scrolling down, please, Mr Holmes admits to false
9 accounting but denies theft. Mr Holmes was ultimately
10 acquitted of theft by direction of the judge. Mr Holmes
11 says this in the first three paragraphs:

12 "The nature of the accused's defence is: As stated
13 in my interview under caution with representatives of
14 Royal Mail I did not steal any monies from Jesmond Post
15 Office. I believe that either the Horizon system has on
16 occasion been at fault and ultimately created the
17 shortfall by creating incorrect entries. The monies
18 entering the joint Barclays Account are proceeds from my
19 wife's business.

20 "I do accept that I did falsify documents to cover
21 the discrepancies but this was only because I thought
22 error notices would be generated and that the money was
23 not actually missing.

24 "2. The accused takes issue with the prosecution in
25 relation to the following matters: I do not believe that

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1 **Q.** You also offered your view on the expert accounting
2 report obtained by the defence in Mr Holmes' case, which
3 dealt among other things, with the question of whether
4 payments into Mr and Mrs Holmes' joint account were from
5 Mrs Holmes' business; do you remember that?

6 **A.** Yes.

7 **Q.** You deal with this at paragraph 121 of your first
8 statement. Could we have that on screen, please. It's
9 page 33 of that first statement. You say here at
10 paragraph 121:

11 "I recall receiving the expert accountant's report
12 ... I cannot recall conducting further enquiries or what
13 my response to the report, but having considered the
14 document UKGI00014638 (an email I sent to Juliet
15 McFarlane on 19 August 2009), I can see that I was of
16 the opinion that, without seeing the business's daily
17 takings for the period in question, I couldn't agree
18 with the expert accountant's conclusions."

19 Could we have on screen, please, the document to
20 which you're referring in this paragraph. It's
21 UKGI00014638. This is the email from you to Juliet
22 McFarlane dated 19 August 2009. At the outset, you say:
23 "In regards to the Expert Accountant's Report ...
24 "I cannot ascertain how much from the business has
25 been deposited without a full list of daily takings for

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1 the period. I have any received extracts."

2 That seems to be what you're referring to in your
3 witness statement as to your view on the takings. You
4 then set out, at some length, just scrolling down, your
5 observations on the report and you conclude over the
6 page in this way:

7 "Whereas the Expert Report views the amounts in to
8 the Barclays Account is the takings from the business,
9 my view is the manner in which the deposits are made
10 suggests differently. However without the daily takings
11 for the period I cannot say for certain."

12 It appears from this email that you wish to see the
13 takings to enable you to rebut what the expert had
14 concluded; is that right?

15 **A.** I wouldn't say it was to rebut what the expert said; it
16 was just to confirm what he was saying.

17 **Q.** Was it common for you, as an Investigator, to provide
18 comments to assist challenge of an expert report?

19 **A.** I was asked to -- if I accepted the expert's report and
20 I don't think I'd be -- it would be right for me to make
21 a comment without actually seeing it.

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

23 **SIR WYN WILLIAMS:** Well, before we leave it, it looks,
24 Mr Daily, that you sent that email on the day before
25 a court hearing. If you look at the last sentence of
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1 time in Scotland, was the Lead Officer?

2 **A.** That's correct.

3 **Q.** This was the point at which, in 2008, you and Mr Grant
4 were the only Post Office Investigators in Scotland; is
5 that right?

6 **A.** That's correct.

7 **Q.** At some point in 2009, Mr Grant left the Post Office and
8 the case file was transferred to you?

9 **A.** That's correct.

10 **Q.** Could we have paragraph 13 of Mr Daily's second
11 statement on screen, please. It is page 8 of
12 WITN08940200. At paragraph 13 you say:

13 "Paragraph 16 of the Second Request asks me what
14 investigations were made into Mr Quarm's finances.
15 Having considered the record of the interview which took
16 place on 8.8.08 ... I note that I obtained some
17 financial details from Mr Quarm in order to complete the
18 Financial Evaluation form. Having considered the
19 document ... (a letter Mr Quarm sent to Raymond Grant
20 dated 12.8.08), I can see that Mr Quarm sent bank
21 statements to Raymond Grant, together with a copy of his
22 wife's P60. I don't recall any further investigations
23 Raymond Grant made into Mr Grant's *[sic]* finances."

24 In terms of your other involvement in the case, in
25 addition to obtaining financial details to complete the

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1 it. It's on the next page. You say you were going to
2 take a hard copy of your file to court "tomorrow", yes?

3 **A.** Yes, sir.

4 **SIR WYN WILLIAMS:** So at court did you ask to see those
5 parts of the underlying material which the expert had
6 used, in order to reach his conclusions?

7 **A.** I wasn't required to attend court, sir.

8 **SIR WYN WILLIAMS:** So after you sent that email, you were
9 told you needn't attend; is that right?

10 **A.** I believe that would be the case, yes, sir.

11 **SIR WYN WILLIAMS:** Because, obviously, at the time of the
12 email, you were going to court?

13 **A.** Correct, sir.

14 **SIR WYN WILLIAMS:** Anyway, you didn't go to court?

15 **A.** No, I wasn't required to go to court. I think Mr Holmes
16 had pled (*sic*) guilty to the charges of false accounting
17 after the email. I can't be certain.

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

19 **MS PRICE:** Turning then, please, to the investigation and
20 prosecution of Mr William Quarm. You deal with your
21 involvement in this case at paragraphs 7 to 26 of your
22 second statement, and do feel free to have that in front
23 of you if it assists. Is it right that you were
24 initially involved as the Second Officer in the case,
25 and that Raymond Grant, who was an Investigator at the
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1 financial evaluation form, you were present at
2 an interview with Mr Quarm on 7 August 2008; is that
3 right?

4 **A.** Yes.

5 **Q.** Could we have the record of that interview on screen,
6 please. The reference is POL00166599. We have the date
7 there, the date of the interview, 7 August 2008, William
8 Quarm being interviewed. 44 minutes of interview, and
9 the Interviewing Officers are listed as Raymond Grant
10 and you. You appear to be the Second Officer in this
11 interview; is that right?

12 **A.** That's correct.

13 **Q.** Could we go, please, to the bottom of page 9 of this
14 document. Three questions up from the bottom, please.
15 Mr Grant asks about the shortage discovered at audit.
16 He says:

17 "Going on then to what happened at the audit, the
18 Audit Team discovered a shortage which had been declared
19 to me as, excuse me for a second, £40,277.76 do you
20 agree with the audit findings, were you here when the
21 audit took place?

22 **Answer:** Oh well I was around yeah.

23 **Question:** Yeah and did the Auditors ask you do you
24 agree their findings did you disagree with what they
25 discovered?"

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1 Over the page, please:
 2 **"Answer:** Well I told them that I wasn't happy
 3 because I was sure there was an error way back in
 4 January February the ATM.
 5 **"Question:** Right okay.
 6 **"Answer:** Set up.
 7 **"Question:** Right when did you get your ATM in?
 8 **"Answer:** Several years ago.
 9 **"Question:** Was it and you've had it a couple of
 10 years right [because] some offices are just getting them
 11 now you see that's why I was asking. Now what do you
 12 suspect the error with the ATM was then?
 13 **"Answer:** I can't remember the details now.
 14 I worked out that the there should have been
 15 a difference and I showed it on the, on the.
 16 **"Question:** The branch trading statements?
 17 **"Answer:** Aye for a while and then somebody phoned
 18 me up and said why are you carrying that?"
 19 Then this seems to be a question from you:
 20 "RD: How much was the difference?
 21 **"Answer:** I don't remember now.
 22 "Mr Grant: Did you say January this year?
 23 **"Answer:** January February."
 24 Then you say:
 25 "Right okay. Where were you showing it on the
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1 "Do you ever remember taking money out of the Post
 2 Office to pay an invoice?
 3 **"Answer:** Not consciously no."
 4 You say: "Not consciously?"
 5 **"Answer:** No."
 6 Page 33 of this document, please. Raymond Grant
 7 asks about four questions down:
 8 "You're declaring what was actually on hand but then
 9 what you're saying to the Horizon system that you're
 10 making that good is that correct?
 11 **"Answer:** Yeah.
 12 **"Question:** Did you in fact put that money in to
 13 make the shortage good?
 14 **"Answer:** No there's a bank loan to do that.
 15 **"Question:** There was, is that what this bank loan
 16 that you were waiting on for?
 17 **"Answer:** Yes.
 18 **"Question:** Right, right. Now if you're saying that
 19 you made that good, the following day your balance would
 20 be back to zero?
 21 **"Answer:** Yeah."
 22 Then at page 38 of the transcript there is this.
 23 Mr Grant, four questions down, says:
 24 "Right so this figure is an inflated figure?
 25 **"Answer:** Yeah.
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1 Branch Trading Statement?
 2 "RG [Raymond Grant]: Was it in the suspense account?
 3 It must be February [because] that's the one we don't
 4 have. I've got January and I've got March and there's
 5 nothing on those on the suspense account."
 6 Then there's a discussion about the paperwork that
 7 follows.
 8 So Mr Quarm was raising in interview, wasn't he,
 9 that he had had concerns about the ATM and errors and
 10 there seems to have been a suggestion there was
 11 a discussion of this on the phone with someone; is that
 12 a fair summary of that?
 13 **A.** Yes.
 14 **Q.** Going, then, to page 14 of the document in front of us,
 15 about two thirds of the way down the page:
 16 "RG [Raymond Grant]: Right and where did you get the
 17 money from to pay those invoices?
 18 **"Answer:** Well, there was money coming in on a daily
 19 basis.
 20 You say:
 21 "Okay and Post Office money was there ever used to
 22 pay invoices?
 23 **"Answer:** Well it must have been or we wouldn't have
 24 this situation."
 25 Mr Daily, you:
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1 **"Question:** Inflated by yourself?
 2 **"Answer:** Yes.
 3 **"Question:** So that it shows less of a shortage is
 4 that correct?
 5 **"Answer:** Yes.
 6 **"Question:** Because you were expecting this bank
 7 loan at any time. If that bank loan had kicked in you
 8 would have physically had that money here?
 9 **"Answer:** Yes."
 10 So Mr Quarm was saying interview, wasn't he, that he
 11 was waiting for a bank loan to make good the shortage?
 12 **A.** That's correct.
 13 **Q.** You made a statement, or we have a draft statement for
 14 the proceedings against Mr Quarm in your name. Can we
 15 have that on screen, please. It's POL00166684. This is
 16 unsigned and undated, that appears to be a witness
 17 statement in your name. Do you recognise that?
 18 **A.** I do.
 19 **Q.** In it on page 2, paragraph 2, you say this:
 20 "During this discussion Mr Quarm appeared not to be
 21 understanding the questions put to him."
 22 Is this a reference to the interview?
 23 **A.** Yes.
 24 **Q.** "He said because of the interview he had ... Mr Quarm
 25 was allowed time to do this and confirmed he was in
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1 a fit state and wished to continue. It was explained to
2 him that if he felt unwell, then he should say so and
3 the interview would be suspended. He reiterated he was
4 fit to continue."

5 Just going up, please, a little on this, and further
6 down, apologies, the fourth paragraph:

7 "Mr Quarm was shown Branch Trading Statements and
8 schedule of the Branch Trading Statements. Mr Quarm
9 confirmed he signed the statements. He explained that
10 they were not an accurate reflection of the cash and
11 stock at the time they were produced. Mr Quarm said he
12 had inflated the cash-on-hand figure, to match what the
13 figure on the Horizon system. He said it was done to
14 disguise the fact that he had taken the money. Mr Quarm
15 said no one else knew of his actions."

16 That section there, "Mr Quarm has said he inflated
17 the cash-on-hand figure and it was done to disguise the
18 fact that he had taken the money", how do you reconcile
19 that with the account we've just been through in
20 interview that Mr Quarm had been waiting for a bank loan
21 to make good the shortages?

22 **A.** Each case is on its own merits. It's -- you've got to
23 understand, I was Second Officer in this case and I'm
24 more there to corroborate what happens and to ask
25 questions and to provide a statement and, in relation to

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1 were requested from Fujitsu in this case:

2 "I don't recall that any Horizon data or ARQ logs
3 were requested."

4 Then at paragraph 16, in relation to whether any
5 legal advice was obtained, you say you're:

6 "... not aware of Raymond Grant obtaining any legal
7 advice ... personally [you] do not recall obtaining any
8 legal advice at any stage of the investigation when the
9 case was transferred to me. The only recollection
10 I have about obtaining any legal advice was prompted by
11 my review of the documents that I describe at
12 paragraph 21 ..."

13 But it's right, isn't it, that that related to the
14 recovery of money after the prosecution?

15 **A.** That's correct.

16 **Q.** In terms of the disclosure in the case, you deal with
17 this at paragraph 18, and you say this:

18 "Paragraph 21 of the Second Request asks me who was
19 the Disclosure Officer in this case", and you're asked
20 to explain your role in relation to disclosure.

21 Having considered the documents you describe there
22 you can see that there was a letter from the COPFS to
23 Raymond Grant on 1 July 2009 "asking him to lodge the
24 productions for the case". But is it right that it was
25 you who submitted the productions to the COPFS --

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1 this, Mr Quarm had admitted that he'd been -- well,
2 using Post Office money to go into his bank account and
3 that was to pay suppliers. I'm not -- I don't really
4 understand what you mean to --

5 **Q.** Well, the paragraph below, you make reference, in
6 fairness and in context, to the intention to repay the
7 money when he'd sold his property, and he'd received the
8 loan from the bank. But the characterisation in the
9 paragraph above is the reason for inflating the
10 cash-on-hand figure was to disguise the fact he'd taken
11 the money. What was it that led you to conclude that
12 that was his motivation?

13 **A.** I don't understand because the way I'm reading this,
14 Mr Quarm admitted to inflating the cash and it was done
15 to disguise the fact he'd taken the money, and that was
16 to use his suppliers. That's how I'm reading that.

17 **Q.** That document can come down now, thank you. Is it right
18 that you cannot recall if any further investigation was
19 required in the Quarm case when it was transferred to
20 you in 2009?

21 **A.** That's correct. I don't recall.

22 **Q.** Could we have paragraph 15 on Mr Daily's second
23 statement on screen, please. It's page 8. At
24 paragraph 15 you say, in response to the question of
25 whether any Horizon data and, in particular, ARQ logs

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1 **A.** That's correct.

2 **Q.** -- on 11 August 2009?

3 **A.** That's correct.

4 **Q.** Could we have on screen, please, the second document to
5 which you refer in that paragraph, which is POL00166753.

6 Apologies, sir, we seem to have a technical hitch.
7 I'm sorry to ask, sir, but could we have a couple of
8 minutes just to sort out the document being put up on
9 screen?

10 **SIR WYN WILLIAMS:** Yes. I'll remain where I am but I'll
11 just go off screen for five minutes unless someone
12 alerts me to the fact I can come back earlier.

13 **MS PRICE:** Thank you, sir.

14 **(2.49 pm)**

(A short break)

16 **(2.56 pm)**

17 **MS PRICE:** Hello, sir. The issue is resolved.

18 Could we have on screen, please, that document which
19 is referred to in paragraph 15, the second document
20 which is POL00166753. So this is from you, submitting
21 to the Procurator Fiscal's office, the productions that
22 you addressed in paragraph 15 that we've just looked at.
23 Looking through this list, which lists the
24 productions -- and do take your time to look through.

25 **A.** Yes.

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- 1 **Q.** Scrolling down a little, please -- is that the end of
2 the document? Over the page.
3 Looking through the list there, does that assist you
4 with whether ARQ data was obtained from Fujitsu in this
5 case?
6 **A.** I didn't see any ARQ data on there.
7 **Q.** It's right, isn't it, that this was a case in which
8 Mr Quarm had raised concerns about the ATM and errors on
9 the system and raised a telephone conversation about
10 those issues. As far as you can recall and see from the
11 documents, were any enquiries made to establish whether
12 there had been any calls, either with a helpline or with
13 Product and Branch Accounting to establish whether his
14 discussion on the phone with someone about the errors
15 was correct?
16 **A.** I wouldn't say. As I said, Raymond Grant led the
17 investigation. I've no idea what part I picked this up
18 when Raymond left.
19 **Q.** The investigation in Mr Quarm's case was progressing at
20 the same time as Mr Holmes' case. Did it occur to you
21 that both individuals were raising issues relating to
22 the system in their interviews?
23 **A.** No, because Mr Quarm said his issues were with the ATM
24 and I don't believe it was mentioned. It was linked to
25 Horizon at the time. So during interview, no.

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- 1 2008 and you accepted that Peter Holmes made it very
2 clear that there were problems with Horizon at the
3 branch and that the apparent shortfalls might be due to
4 Horizon. You've accepted that, haven't you?
5 **A.** Yes.
6 **Q.** He didn't only say it's the Horizon system that let us
7 down, he said that he thought, he was hoping that the
8 problems, the shortfall, was something that the computer
9 might have done, in his own words; does that ring
10 a bell?
11 **A.** Yes.
12 **Q.** He also said that the Horizon system has been bloody
13 awful; do you remember him saying that?
14 **A.** Yes.
15 **Q.** He was quite frank about what he thought about the
16 Horizon system in the Jesmond branch?
17 **A.** Yes.
18 **Q.** So in your witness statement at paragraph 98, we don't
19 need to go to it, but you say that Mr Holmes indicated
20 that the loss might be down to the Horizon system and
21 you say:

22 "At the time, I don't believe I would have been
23 aware of the significance of this as I don't recall
24 there being any issues with Horizon at the time."

25 You've said in your evidence this afternoon, just

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- 1 **Q.** In Mr Quarm's case, did you make any enquiries of
2 colleagues or seniors as to whether there were any other
3 reports of errors related to ATMs at the time?
4 **A.** As I said, that was Mr Grant's enquiries. He'd have
5 been carrying out those enquiries in this case.
6 **Q.** Having had the opportunity to review the documents
7 relating to Mr Holmes' case and Mr Quarm's case, are
8 there any reflections that you have on your involvement
9 in either of those cases?
10 **A.** No.
11 **MS PRICE:** Sir, those are all the questions that I have for
12 Mr Daily.
13 Do you have any before I turn to Core Participants?
14 **SIR WYN WILLIAMS:** No, thank you, no.
15 **MS PRICE:** Mr Jacobs has some questions, sir.
16 **Questioned by MR JACOBS**
17 **MR JACOBS:** Thank you, Mr Daily. I represent 157
18 subpostmasters. Sitting next to me is Marion Holmes,
19 the widow of Peter Holmes, who you've been talking about
20 today.
21 **A.** Yes.
22 **Q.** As you know or may know, Mr Holmes died in 2015 and his
23 conviction was posthumously overturned in 2021.
24 Now, we know from evidence this morning and you told
25 Ms Price that you interviewed Mr Holmes on 19 September

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- 1 now, to Ms Price, that you thought this was the first
2 time that this issue had come up; is that right?
3 **A.** With myself, yes.
4 **Q.** What I have to say to you is that Mrs Holmes and
5 a number of my other clients simply don't believe that.
6 We can't accept that you had no idea that other
7 subpostmasters or assistants had problems with the
8 Horizon system and were raising those in interviews?
9 **A.** I can only tell you that when Mr Holmes brought up
10 Horizon interview with myself, from what I recall,
11 that's the first time I've heard someone bring it up in
12 an interview. I wasn't aware of all the other cases
13 that were going ahead. I didn't know -- I don't even
14 know half of these people -- all of the people that have
15 been mentioned here or in this Inquiry. It was never
16 sent down to us.
17 **Q.** You were a Security Investigations Manager from 2005;
18 that's right, isn't it?
19 **A.** Yes.
20 **Q.** So you'd been in post for about three years at this
21 time?
22 **A.** Yes.
23 **Q.** You said to Ms Price that you weren't aware of the
24 acquittal of Suzanne Palmer in 2007, the year before.
25 **A.** Correct.

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1 Q. Were you aware of the *Castleton* case, which raised the
2 integrity of the Horizon issue?
3 A. Until this Inquiry started, no.
4 Q. Were you aware of other cases that had been through the
5 courts?
6 A. No.
7 Q. You were part of a team of Investigators, weren't you?
8 A. Correct.
9 Q. Did you discuss cases amongst yourselves?
10 A. Within our own team, yes, we did discuss cases and what
11 your caseloads were but -- we did have team meetings but
12 I don't recall anything being raised about Horizon at
13 that time.
14 Q. Quite a few people have come to give evidence to the
15 Inquiry who were Post Office Investigators and they've
16 said that there was a message from above "This issue
17 might come up, subpostmasters might raise Horizon
18 points, but the message from the business is that the
19 system is robust"; do you recall that at all?
20 A. Constantly.
21 Q. Constantly?
22 A. Yes.
23 Q. So what you're saying is that you were told constantly
24 that subpostmasters would raise these issues but that
25 this was the first one that you were involved in where

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1 position and then, if you thought it necessary, ask him
2 for consent for a search?
3 A. It was expected that you'd conduct a search first.
4 Q. Our clients would say that this particular policy, as
5 you say, or practice, that it was heavy-handed and
6 disproportionate. What would you say to that?
7 A. The search of Mr Holmes' property? No, it wasn't.
8 Q. You searched his car, didn't you?
9 A. Yes, we did.
10 Q. You looked at his bank account withdrawals and took
11 those away, didn't you?
12 A. In drawers?
13 Q. In his house, drawers?
14 A. I've no idea, I can't remember where they were because
15 I also stated in my statement that I did find an item
16 and then I was a scribe. The people -- the other
17 Investigators who were searching brought the items to
18 myself and noted them down.
19 Q. You wrote to his bank and you wanted details of
20 Mrs Holmes' and Mr Holmes' bank accounts; that's right,
21 isn't it?
22 A. That's right, yes.
23 Q. And you made enquiries or you wanted to make enquiries
24 into his pension, didn't you, to see how much money was
25 in his pension; is that right?

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1 the issue was raised?
2 A. I can't recall when the Post Office started telling us
3 there was issues with Horizon. I couldn't honestly give
4 you the first date that I was aware of it.
5 Q. I want to must have on to the home search that you
6 conducted of Mr Holmes' family home and you deal with
7 that at paragraph 101 of your statement. I won't ask
8 that to be put up, I'm aware of the time, but you say:
9 "The decision to carry out a search followed POL
10 policy. We were instructed to conduct searches to
11 preserve any evidence."
12 What was that policy?
13 A. I can't recall the policy word for word but I believe it
14 may even have been part of the compliance, but I can't
15 recall that either. But the instructions were we were
16 to request a search of someone's home where there was
17 a shortage discovered.
18 Q. Was it normal to go into people's homes, go into their
19 bedrooms and their drawers and take out statements from
20 banks before a postmaster or an assistant had even been
21 interviewed, Mr Daily?
22 A. If you're asking me if I was comfortable doing that, no,
23 I wasn't comfortable but it was part of the job and it
24 was done voluntarily.
25 Q. Why didn't you interview Mr Holmes first, establish the

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1 A. That's correct.
2 Q. If I could just ask for a document to go up on screen.
3 This is the Financial Evaluation report, it's
4 POL00043951. If we could perhaps go to the first page,
5 the third paragraph of that. Just wait for it to come
6 up on the screen. It's not very clear, I'm afraid --
7 well, it is now. So the third paragraph says, third
8 substantive paragraph:
9 "There is nothing evident that would explain how
10 Holmes has disposed of the loss. His wife has her own
11 business making and selling wedding cakes, the
12 possibility exists it has been used for this."
13 A. Correct.
14 Q. So you're looking for money that you think has gone,
15 aren't you?
16 A. Yes.
17 Q. You're aware, of course, because you've referred to it
18 in your statement, that in the Court of Appeal, your
19 employer, your current employer, the Post Office,
20 accepted and the Court of Appeal found that there was no
21 actual loss in Mr Holmes' case, as opposed to a Horizon
22 generated shortfall; that's right, isn't it?
23 A. It was in this case, indeed, yeah.
24 Q. So, effectively, Mr Daily, what you were doing, perhaps
25 you can see it more clearly now, is you were looking for

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1 something that was never there in the first place?
 2 **A.** No, that's not the case at all.
 3 **Q.** Well, there wasn't a loss; you were looking to see where
 4 the money had gone, there --
 5 **A.** Well, we were looking to see if there was a loss within
 6 the branch and the investigations and enquiries were
 7 trying to establish where the money was and what caused
 8 the loss.
 9 **Q.** Can we go back to what the Court of Appeal said. The
 10 Court of Appeal said that there was no actual loss, as
 11 opposed to the Horizon generated shortfall?
 12 **A.** In hindsight, now the issues with Horizon have arisen,
 13 at that time that wasn't the case at all.
 14 **Q.** Mr Daily, sorry, but it doesn't seem to make sense.
 15 What you're saying is that the Post Office accepted
 16 before the Court of Appeal, and the Court of Appeal
 17 found, that there was never a loss in Mr Holmes' case
 18 but you're saying that was the position in 2021 but that
 19 wasn't the position at the time?
 20 **A.** The position in 2021, I believe the Court of Appeal was
 21 talking about Horizon and I could be wrong what I'm
 22 saying, Horizon -- the issues with Horizon could have
 23 caused this loss within the branch. At that time
 24 I wasn't aware of it, I was conducting an investigation
 25 into a £46,000 shortage in a branch.

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1 to investigate lines of inquiry which are raised before
 2 you? Did you think it was so fanciful that it wasn't
 3 even worth bothering to look at it?
 4 **A.** No that wasn't the case, sir.
 5 **SIR WYN WILLIAMS:** No. So what did you do? In the absence
 6 of any success in discovering the whereabouts of the
 7 money, what did you do to investigate whether, in fact,
 8 there had been a loss?
 9 I think silence --
 10 **A.** I think -- I'm not really quite sure how to answer that,
 11 sir. I mean --
 12 **SIR WYN WILLIAMS:** Well, did you do anything?
 13 **A.** -- it was -- sorry?
 14 **SIR WYN WILLIAMS:** Did you do anything?
 15 **A.** Yes, we interviewed Mr Holmes, he admitted to false
 16 accounting.

17 **SIR WYN WILLIAMS:** All right. Thank you.
 18 **MR JACOBS:** If we could go down to the second page of the
 19 document, please, and it's the last box there. Here we
 20 go. It says, "Other -- comments":
 21 "The only luxury item that the Holmes [that's the
 22 family Holmes) appear to have is the home computer that
 23 has been built by a 'friend'. The TV is a Samsung flat
 24 screen approximately 26 inches. Peter Holmes' car has
 25 a private registration, cost unknown. There is

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1 **MS PRICE:** Sir, I'm sorry to interrupt but, just to be clear
 2 about the Court of Appeal's wording: I think the Court
 3 of Appeal's wording was there was no proof of actual
 4 loss. Forgive me for being pedantic but just so
 5 everyone is clear.
 6 **SIR WYN WILLIAMS:** Well, it's, I think, clear to me, which
 7 is perhaps at least of some importance. The Court of
 8 Appeal accepted that it was possible for Horizon to show
 9 a loss but that loss was, in fact, illusory and that
 10 applies in Mr Holmes' case.
 11 **MR JACOBS:** Thank you, sir, that's correct and I apologise
 12 if I didn't phrase that --
 13 **SIR WYN WILLIAMS:** But let me ask this question, Mr Jacobs.
 14 As it happens, Mr Daily, your evidence about the
 15 searches and investigations you conducted to, as you
 16 then thought, as you've told me, discover where the
 17 money was, well, they were quite thorough and yet you
 18 found nothing. Now, in the light of that, did that not
 19 give added credence to Mr Holmes' suggestion that this
 20 was generated by the computer, as opposed to being real?
 21 **A.** Not at the time, sir.
 22 **SIR WYN WILLIAMS:** Right. Just didn't cross your mind as
 23 a possibility?
 24 **A.** Not at the time, sir.
 25 **SIR WYN WILLIAMS:** But how does that square with your duty

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1 collateral in the family home that is owned by the
 2 Holmes. Holmes claimed his wife didn't know of the loss
 3 and put his sleepless nights down to his age. Holmes
 4 was given a [document in relation to] his wife's
 5 business account."
 6 We can take that off the screen now, thanks. The
 7 question I want to ask you is: this document is
 8 a Financial Evaluation Sheet, isn't it?
 9 **A.** It is, yes.
 10 **Q.** You said in your evidence this morning, around about
 11 12.15, that these documents were in order to show that
 12 a subpostmaster or person being investigated would have
 13 sufficient assets to recover money; is that right?
 14 **A.** Correct, yes.
 15 **Q.** You also said it was linked into your bonuses and your
 16 targets?
 17 **A.** No, I didn't say it was linked to my bonuses.
 18 **Q.** Well, what you said in relation to your targets was that
 19 there was a problem because -- I'm just looking at this
 20 on the screen now:
 21 "It was always considered an unfair target because
 22 any inquiry you did, any case you did, all you could say
 23 to the person is 'Were you in a position to repay the
 24 money?' If that person didn't have the money you
 25 couldn't get blood out of a stone."

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1 So what we understand by that is that you're saying
 2 that you wanted to ensure that there was money that the
 3 subpostmaster or the person accused had that could be
 4 got at by the Post Office and that would protect your
 5 target; is that right?

6 **A.** That's not to say it's to protect the target. I think
 7 that's very unfair. As I stated earlier on, the Post
 8 Office hit a target. When we conducted an interview, if
 9 there was a shortage, we asked if the person was in
 10 a position to repay the money. If they weren't in
 11 a position to repay the money, we'd ask them how they
 12 intend to repay it. If they didn't have the money, they
 13 didn't have the money.

14 **Q.** You see, Mr Daily, there are two scenarios here. The
 15 first scenario is that you were looking for money that
 16 you thought had been lost when there was never any proof
 17 of such loss -- I hope I've got that right -- and the
 18 second is that you were looking to see if Mr Holmes
 19 might have had enough assets to pay Post Office for
 20 losses that couldn't be proved and, ultimately, didn't
 21 exist. That's the position, isn't it?

22 **A.** We had to complete the Financial Evaluation Sheet that
 23 we were instructed to do and send that to the Financial
 24 Investigators for them to make a decision on that. That
 25 wasn't my decision, whether someone had enough assets

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1 there was no investigation into the integrity of the
 2 Horizon figures?

3 **A.** No, I don't believe that. I would not have put it into
 4 my report if I hadn't requested that information and
 5 looked at it.

6 **Q.** Do you accept that's what your employer, the Post
 7 Office, told the Court of Appeal and that's what the
 8 Court of Appeal found?

9 **A.** I accept what they've said, yes, but I stand by what
 10 I've said here.

11 **Q.** The fact, Mr Daily, is that the evidence before the
 12 Inquiry shows there were no checks. The evidence in the
 13 Schedule of Non-Sensitive Material and the list of
 14 exhibits shows that there were no checks. The position
 15 of Post Office in the Court of Appeal is that there were
 16 no investigations into the integrity of the Horizon
 17 figures. That is what the Court of Appeal found. The
 18 uncomfortable truth for you is that what you said in
 19 your report wasn't true; that's right, isn't it?

20 **A.** No, it's not. I maintain my stance on that one and I'd
 21 like to see the Green Jacket to see exactly what
 22 documentation is in there.

23 **Q.** I'm going to ask you about another passage in your
 24 investigation report. If we could go, perhaps, to that.
 25 It's POL00050832. It's the bottom of page 7 and the top

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1 and, as far as proof that there was no loss, as I say,
 2 we were investigating a £46,000 loss. Mr Holmes told us
 3 that he was inflating cash figures.

4 **Q.** So you were just doing what you were told; is that
 5 right?

6 **A.** Basically, yes, that's the process.

7 **Q.** I want to ask you about Horizon checks. You were
 8 referred by Ms Price earlier on this morning to your
 9 investigation report and you say:

10 "Mr Holmes has attempted to blame the Horizon system
 11 on the shortages, however checks have revealed no
 12 problems."

13 That was at 12.45, you were taken to that.

14 Then Ms Price told you that there was no evidence of
 15 any checks in the Inquiry. There was nothing in the
 16 Schedule of Non-Sensitive Material and we found out this
 17 afternoon that there was nothing in the list of
 18 exhibits; is that right?

19 **A.** Correct.

20 **Q.** Again, the Court of Appeal found, and the Post Office,
 21 your employer, conceded before the Court of Appeal,
 22 there was no investigation into the integrity of the
 23 Horizon figures; do you accept that?

24 **A.** Sorry, can you repeat that?

25 **Q.** The Court of Appeal found that in Peter Holmes' case

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1 of page 8 and it's something that Ms Price also took you
 2 to today at around 12.45.

3 So the bottom of page 7, top of page 8, please:

4 "Mr Holmes stated he had spent too many years in the
 5 police force, seeing things go wrong to start stealing
 6 money from anybody. He was also a subpostmaster at
 7 Monkseaton for 6/7 years. Taking onboard it is
 8 incredulous to think Mr Holmes would allow a large
 9 shortage, never mind 11 large shortages to go
 10 unreported. The evidence would suggest Mr Holmes has
 11 been producing the false accounts since 24 October 2007.
 12 There are eleven false accounts produced since then."

13 So what we have here is we have an assistant at
 14 a subpostmaster branch who was a police officer for
 15 12 years with an exemplary record. We have a man who
 16 ran a branch at Monkseaton for 6 to 7 years, totally
 17 trustworthy, impeccable character. Do you accept that
 18 in this investigation report, it demonstrates that
 19 Mr Holmes' status as a former policeman should have
 20 caused you to take seriously his concerns about what was
 21 happening in the Horizon terminal in his branch but, in
 22 reality, what you did was you used his reputation and
 23 good character against him.

24 **A.** No, that's not true.

25 **Q.** Many of my clients say that this scandal shows that

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1 there has been a culture within Post Office to
 2 systematically destroy the reputations of subpostmasters
 3 and their assistants. You were part of that culture,
 4 weren't you?

5 **A.** No.

6 **Q.** Finally, Mr Daily, the Court of Appeal found that Peter
 7 Holmes' prosecution was an affront to justice; you
 8 accept that?

9 **A.** Yes.

10 **Q.** Tragically, as you know, Mr Holmes died in 2015, before
 11 his name could be cleared. Your investigation was money
 12 driven and misconceived and led to this miscarriage;
 13 that's right, isn't it?

14 **A.** No.

15 **Q.** In your witness statement at about paragraphs 131 and
 16 132, you say you were asked about what your reflections
 17 are on the way the investigation and prosecution of
 18 Mr Holmes was conducted by the Post Office and the
 19 outcome of the case and your attention was drawn to the
 20 judgment of the Court of Appeal in *Josephine Hamilton*
 21 *and Others*.

22 All you say, in terms of your reflections, is that
 23 you acknowledge that ARQ data was obtained but you can't
 24 recall whether or not it was disclosed; if it was
 25 disclosed, you can't offer a reason now why that was.

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1 I'm asked to ask you, to you accept any personal
 2 responsibility for what happened to Mr Holmes?

3 **A.** No, I was only doing my job.

4 **MR JACOBS:** Thank you. No further questions.

5 **SIR WYN WILLIAMS:** Anyone else?

6 **MR HENRY:** I have a few questions, sir.

7 **Questioned by MR HENRY**

8 **MR HENRY:** Edward Henry, on behalf of Mhari McDougall.
 9 We know, Mr Daily, that prosecutions in England
 10 ceased more or less in 2013: there were two in 2013 to
 11 2014; none in 2014 to 2015; and one in 2015 to 2016.
 12 Just help us, please. You worked with Mr Bradshaw,
 13 didn't you?

14 **A.** That's correct.

15 **Q.** You worked, also, with Diane Matthews, correct?

16 **A.** Correct.

17 **Q.** And Andrew Wise?

18 **A.** Correct.

19 **Q.** They were all part of your team. How did they feel
 20 about private prosecutions stopping south of the border?

21 **A.** Sorry, can you --

22 **Q.** How did they feel about private prosecutions stopping
 23 south of the border?

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

25 **Q.** Really? You didn't discuss it with them?

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1 It's striking, isn't it, that you offer no
 2 acknowledgement of your wrongdoing and you offer no
 3 apology in your statement? Do you have anything to say
 4 about that?

5 **A.** As I stated earlier, I believed I'd actually disclosed,
 6 it was the first committal bundle I'd ever done in
 7 England, it's the only one I've ever done in England,
 8 and I thought I'd actually put that data onto it and
 9 it's -- obviously I haven't, and that's an error on my
 10 part.

11 **Q.** Marion Holmes has frequently said that this is her
 12 husband Peter's story and not hers. My final question
 13 to you is: if Peter Holmes were here today, what would
 14 you say to him?

15 **A.** From what I have heard last week in the Select Committee
 16 from Fujitsu and the evidence I've given, I'd have been
 17 pleased he'd have been cleared from any wrongdoing
 18 because, throughout all this, we were told that the
 19 Horizon system was robust -- I can't recall when they
 20 first stated it -- there was no integrity issues, and
 21 basically we were getting sent out to just continue
 22 doing our jobs. Now, from what I know now, it was
 23 wrong, we shouldn't even have been doing any
 24 investigations whatsoever.

25 **Q.** I'm just going to ask if I have any more questions.

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1 **A.** No.

2 **Q.** There wasn't any desire to return to the good old days?

3 **A.** No.

4 **Q.** Can I just ask you, please, how closely did you work
 5 with Diane Matthews and Steve Bradshaw?

6 **A.** Diane Matthews, I did one case with her in Scotland.
 7 Steve Bradshaw assisted me in several cases in Scotland.

8 **Q.** So he assisted you in several cases. How did he assist
 9 you; what was his role?

10 **A.** He was the Second Officer only.

11 **Q.** He was involved in the interviews, presumably?

12 **A.** The role of second officer is to corroborate the
 13 interview and, if he thinks there's any questions that
 14 should be asked, he would ask them.

15 **Q.** He had a particular responsibility, didn't he, for
 16 assessing requests for ARQ data; isn't that right?

17 **A.** I can't answer that in what Steve Bradshaw's
 18 responsibilities were.

19 **Q.** Well, weren't you ever aware that he was the gatekeeper
 20 for ARQ requests?

21 **A.** No.

22 **Q.** You weren't aware of any guidance given by Jayne
 23 Bradbury?

24 **A.** Not that I recall.

25 **Q.** Not that you recall. Well, so be it. We'll deal with

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1 that with another witness. Thank you very much.

2 **SIR WYN WILLIAMS:** Did I hear you correctly earlier,

3 Mr Daily, when you said that you'd only actually been

4 involved in one English case, I'll say, as the Lead

5 Investigator, and that was Mr Holmes' case?

6 **A.** No, it was the only investigation, sir, that I had to

7 complete a committal bundle.

8 **SIR WYN WILLIAMS:** So let me be clear about it: did you act

9 as the Lead Investigator from first to last, so to

10 speak, in an English case?

11 **A.** Three cases that I can recall.

12 **SIR WYN WILLIAMS:** Right, three. That's fine. I just

13 wanted to get clear the extent of your involvement in

14 each jurisdiction. When you said that you were the only

15 Investigator in Scotland, I think what I understand from

16 that is that in Scottish cases, after Mr Grant stopped,

17 you were the person who took the lead in investigations

18 in Scotland but, from time to time, obviously, for

19 example, in interviews, people would come and assist

20 you?

21 **A.** Sorry, can you repeat the last part, sir?

22 **SIR WYN WILLIAMS:** Yes. So you would take the lead in all

23 Scottish investigations after Mr Grant ceased to either

24 retire or did something else?

25 **A.** Yes.

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1 done so?

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

3 **Q.** Can you say why you didn't do that?

4 **A.** I didn't think to raise it with the union.

5 **Q.** There has been discussion, in questions earlier today,

6 of the bonus scheme that you were part of. Can you say

7 who approved this bonus scheme for the investigation

8 teams?

9 **A.** I can't say for definite who approved it. There would

10 be the management -- not line management, above that,

11 I believe, would write the objectives, and I couldn't

12 say if it was the Head of Security, or above him. I'm

13 honestly not sure who it was who gave the final

14 approval.

15 **Q.** Thank you. Just briefly, you were discussing questions

16 with Counsel to the Inquiry about disclosure of

17 information to the Crown Office and Procurator Fiscal

18 Service and I just wanted to ask, if an individual was

19 represented, for instance by the NFSP or the CWU or any

20 other representative body, would you disclose

21 information uncovered, either that's sensitive or

22 non-sensitive information, to them, even if you didn't

23 disclose it all to the Crown Office?

24 **A.** No.

25 **MS WATT:** Thank you.

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1 **SIR WYN WILLIAMS:** But, obviously, from time to time, for

2 example in interviews, other investigators would be with

3 you?

4 **A.** Yes. Yes, sir.

5 **SIR WYN WILLIAMS:** Fine. I've got the picture. Thank you.

6 Right. Well -- sorry, are there any other questions?

7 **MS PRICE:** Sir, yes, Ms Watt has some questions.

8 **Questioned by MS WATT**

9 **MS WATT:** Good afternoon, Mr Daily. I represent the NFSP

10 and have a couple of questions for you this afternoon.

11 Can you hear me okay?

12 **A.** Yes.

13 **Q.** At paragraph 57 of your first witness statement, you

14 mentioned that if the suspect was a member of the NFSP,

15 that you would advise them to contact their rep.

16 I wanted to ask you if you were a member of a trade

17 union at that time?

18 **A.** Yes.

19 **Q.** Which one was that?

20 **A.** It's now -- it was the CMA at the time.

21 **Q.** Does it have a different name now?

22 **A.** Is it Unison?

23 **Q.** Can I ask you if you ever contacted your union to raise

24 questions about Horizon being reported to you by

25 suspects as an issue or if any other Investigators had

122

1 Those are my questions. Thank you.

2 **SIR WYN WILLIAMS:** Thank you, is that it, Ms Price?

3 **MS PRICE:** Sir, yes those are all the questions from Core

4 Participants.

5 I just have one final point, sir, in relation to

6 document references. For the three documents which go

7 together to make up the list of exhibits in the case of

8 Peter Holmes, for the purposes of the transcript, those

9 three references are POL00047282, POL00043861, and

10 POL00043917.

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

12 Right, well, thank you, Mr Daily, for providing your

13 witness statement and for giving evidence during the

14 course of the day.

15 I hope, Mrs Holmes, that you will have found at

16 least some of the evidence informative today.

17 So that brings today's proceedings to a close and we

18 will reconvene at 10.00 tomorrow morning.

19 **MS PRICE:** Yes, sir.

20 **(3.30 pm)**

21 **(The hearing adjourned until 10.00 am the following day)**

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