

Wednesday, 24 January 2024

1
2 (10.00 am)
3 **MR BEER:** Good morning, sir, can you see and hear us?
4 **SIR WYN WILLIAMS:** Yes, thank you very much.
5 **MR BEER:** Thank you. May I call Raymond Grant, please.
6 **SIR WYN WILLIAMS:** Of course.
7 **RAYMOND GRANT (sworn)**
8 **Questioned by MR BEER**
9 **MR BEER:** Good morning, Mr Grant, my name is Jason Beer and
10 I ask questions on behalf of the Inquiry. Can you give
11 us your full name, please?
12 **A.** Raymond Grant.
13 **Q.** In front of you there is a witness statement. It's two
14 and a bit pages long, and it's dated 3 January 2024.
15 The Inquiry's URN for that is WITN10540100. It needn't
16 be displayed.
17 Can you turn to the third page of it, please?
18 **A.** Yes.
19 **Q.** Is that your signature?
20 **A.** Yes, it is, yes.
21 **Q.** Are the contents of the witness statement true to the
22 best of your knowledge and belief?
23 **A.** Yes.
24 **Q.** Why is your witness statement so short?
25 **A.** I received the bundle of papers on 5 December last year.

1

1 property and I have to be out of that by the 31st. So
2 I was contacted by one of the senior lawyers involved in
3 the Inquiry by telephone and explained that to that
4 person. Following what I would describe as their
5 priorities being different from mine, in reading,
6 digesting, understanding an inordinate amount of
7 documents, 450 at that time, subsequently another 350 on
8 top of that --
9 **Q.** When you say "documents", do you mean pages?
10 **A.** Yes, pages, sorry, yes, I beg your pardon -- and then
11 having to prepare a detailed statement from my memory
12 from my time of employment, which was 16 years ago, to
13 any involvement in any Post Office investigation. Some
14 of the documents I was asked to review did not even
15 exist at the time of my departure from Post Office
16 Limited. I received a second call some days later
17 advising that I had to complete the task and submit my
18 draft statement by 2 January 2024.

19 I explained again to the caller it was not
20 physically possible for me to devote my personal time to
21 answer all the questions required. They pointed out to
22 me that failure to do so, I would potentially be
23 breaking the law and I had to comply.

24 Again, I stated all the priorities that I had going
25 on but my pleadings were going on deaf ears.

3

1 My current role is I work in a homeless centre for
2 a Christian organisation. It has 30 residents in it.
3 I am the programme manager in that unit. My job is to
4 ensure that these residents get the level of respect and
5 dignity that they deserve. Part of the role is to
6 ensure that at that time of the year, December, in the
7 Christian calendar, there are a lot of activities going
8 on: carol services, Christmas dinners, various other
9 bits and pieces.

10 We were, at that point, five members of staff short.
11 I was working somewhere in the region of 10 to 11-hour
12 days. I was going home, walking my dog and, at the same
13 time, the home where I was living, I was asked to vacate
14 it by the 31 December, and so I was in the process of
15 trying to purchase a property, view a property, deal
16 with conveyancing issues, dealing with mortgage
17 arrangements. So there was a clear clash of priorities,
18 as far as I was concerned.

19 I chose my current job as being the most important,
20 as it directly affected 20 members of staff and 29
21 homeless residents. I fully understand my obligations
22 to this important Post Office Horizon IT Inquiry.
23 However, my time was limited, for all the things that
24 I've said previously.

25 I managed to negotiate an extra month on my rented

2

1 I explained about me moving home and the caller asked if
2 I should -- that I should provide details of my
3 conveyancing lawyer so it could be checked up on.

4 **Q.** So, in short, it was a clash of priorities?

5 **A.** Yes, I'm just getting to it, if you allow me, I've just
6 got one --

7 **Q.** There's more?

8 **A.** Just one more thing, if you don't mind. Thank you.

9 The next level of communication I had was that
10 Sheriff Officers appeared at my door and issued me with
11 the a Section 21 Notice to say that I had to comply and
12 be here today.

13 **Q.** That's right, you're here under the threat of the
14 exercise of compulsory powers. We had to serve
15 a Section 21 notice to get you here.

16 **A.** Yeah, I agree with that. That kind of focused me and,
17 in my time, I then was able to -- my first day off
18 during that was 1 January, following a 10-hour night
19 shift during New Year's Eve and New Year's morning.
20 That was when I drafted this minimum statement to comply
21 with the Section 21 order. I apologise to the court
22 but, for all the reasons I've said, that's the reason
23 why it's such a short statement.

24 **Q.** Well, let's see if we can improve on it today, now that
25 carol services and dog walking are out of the way.

4

1 We asked you as the first question to address,
 2 "please set out the date on which you began work at the
 3 Post Office", and you didn't address it.
 4 **A.** No.
 5 **Q.** When did you start to work at the Post Office?
 6 **A.** Since I drafted this statement, I've sort of tried to
 7 think back. I think -- I started with Royal Mail as
 8 a postman in 1982 and, from there, I've held a number of
 9 positions, if you allow me just a second. I was postman
 10 for a number of years, then I went to postman higher
 11 grade, got the role as duty clerk in the office. I then
 12 became an Assistant Delivery Office Manager, 140 staff,
 13 and there was only two managers. I then got a role as
 14 a Royal Mail Investigation Manager. Don't ask me years
 15 or when that happened because I have no conscious memory
 16 of that. I then transferred over to Post Office
 17 Investigations, I had various job titles after that --
 18 **Q.** Is there any point in me asking you when that was?
 19 **A.** No.
 20 **Q.** Thank you. Please move on.
 21 **A.** The Security Investigation Manager, our titles changed,
 22 Security Manager then became a Fraud Advisor all with
 23 Post Office Limited.
 24 **Q.** One of the documents that we provided you with, in order
 25 to help you make your witness statement, was a witness

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1 **Q.** The 78 documents that we sent you, the 350-odd pages,
 2 you don't refer to any of them in your witness
 3 statement, apart from the transcript of Mr William
 4 Quarm's interview, do you?
 5 **A.** That's correct.
 6 **Q.** Why was that? Why did you pick Mr Quarm's interview as
 7 the one document that you did refer to?
 8 **A.** Well, this Inquiry is about the degree of fairness that
 9 was applied to postmasters during the course of
 10 investigations and the subsequent prosecution of them.
 11 I was reminding myself what had been said during that
 12 interview, and it was the one thing that I believe that
 13 I had a major part in because I was the Lead
 14 Investigator in that interview, so, therefore, I thought
 15 it was important to refresh myself.
 16 **Q.** The fact that you didn't look at or refer to the other
 17 77 documents, that was because of the competing
 18 priorities on your time; is that right?
 19 **A.** That's correct.
 20 **Q.** When you made the witness statement, did you think that
 21 Mr Quarm continued to be guilty of the crime of
 22 embezzlement?
 23 **A.** This witness statement here today?
 24 **Q.** Yes.
 25 **A.** Yes, I did.

7

1 statement that you had made in the investigation of
 2 William Quarm, back in 2008. Can we just look at that,
 3 please: POL00166685.
 4 Can you see this is your witness statement? It
 5 doesn't actually bear a date but, from the context, it
 6 relates to events that have happened in 2008 and appears
 7 obviously to have been made before you left the Post
 8 Office. So I'm going to suggest that it's 2008 as
 9 a date.
 10 If we look at the first paragraph there, you say:
 11 "I have been employed by Royal Mail Group in various
 12 roles for around 26 years. My current position [is]
 13 Investigation Manager."
 14 You explain what one of the main roles of
 15 an Investigation Manager was.
 16 So, if this is right, you've been working for the
 17 Royal Mail Group for 26 years, so around 1982, which is
 18 as you've told us today.
 19 **A.** That's correct.
 20 **Q.** Is there any reason why you couldn't have just said that
 21 in the witness statement?
 22 **A.** At that point I hadn't read that document because, as
 23 I said earlier, I was finding time constraints were very
 24 difficult for me to read any of the documents that I'd
 25 been sent.

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1 **Q.** Does that remain your view?
 2 **A.** I've subsequently been advised that the verdict has been
 3 reversed, so he is now not guilty of the offence.
 4 **Q.** I'm talking about in your mind?
 5 **A.** In my mind, I still think that Mr Quarm had a role to
 6 play in the loss of the money.
 7 **Q.** That's an answer to a different question. The question
 8 would be: did Mr Quarm have a role to play in the
 9 events?
 10 The question I, in fact, asked was: do you think, do
 11 you remain of the view that he's guilty of the crime?
 12 **A.** Yes, I do.
 13 **Q.** Despite the verdict of the High Court of Justiciary in
 14 Scotland?
 15 **A.** Yes.
 16 **Q.** Was that amongst the reasons that you didn't regard this
 17 Inquiry as a priority?
 18 **A.** No.
 19 **Q.** You haven't said that to any of the solicitors in the
 20 Inquiry before, "Mr Quarm was guilty, I don't know why
 21 you're asking me questions about this"?
 22 **A.** If I've said that, then that would be my view at that
 23 time, yes.
 24 **Q.** "It may be a priority for you investigating but it's not
 25 a priority or me."

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1 They would accord with your sentiments, wouldn't
2 they?
3 **A.** Well, I think you're mixing up the priority. I'm
4 talking about the priorities that I had in my personal
5 role 16 years on from being a Post Office Investigator,
6 working for another organisation, who pay me my salary.
7 There was nobody paying me the salary to do the work
8 that we're here talking about today. I was being asked
9 to do that in my own personal time. My personal time
10 was being used up for my personal reasons that I've
11 already explained. I do not think that it was a fair
12 thing to ask me to do in such a short space of time,
13 considering that this Inquiry has been going on for
14 a number of months and years and Phase 4, certainly,
15 since, I believe, October.

16 That -- for me to get that in a space of 26 days to
17 review and take cognisance of all the facts that had
18 been presented to me and to make comment on them, as
19 I said, some of the documents that were contained within
20 there I subsequently found out that they did not apply
21 to me because they weren't published until after I'd
22 left the business.

23 **Q.** You say in your witness statement to the Inquiry that
24 you recall nothing at all and, essentially, none of the
25 documents that we sent to you help you in any way; is

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1 say quite clearly that I have no recollection nor
2 knowledge nor any details of any documents that will
3 assist me to answer the collection of questions you
4 raise in your requests."

5 Had you actually read any of the documents when you
6 said that?

7 **A.** I glanced over them.

8 **Q.** So you were saying that none of the documents will help
9 you, even though you hadn't read them?

10 **A.** Well, as I said, my priorities was not to read all that
11 information. As you say, what was it, 78 documents were
12 sent to me, it's actually 450 pages of information, and
13 for me to spend my time, when I had other things that
14 were more pressing for me to deal with, I wrote this
15 statement on 1 January. It had to be in by 2 January.

16 So, in that space of time, it was my one day off that
17 I had in the time allotted to provide this witness
18 statement, so I gave it my best shot. What I've written
19 down here is what I was dealing with at the time.

20 **Q.** When did you leave the Post Office?

21 **A.** It was somewhere early 2009.

22 **Q.** Do you hold any qualifications that are relevant to
23 conducting criminal investigations into allegations of
24 embezzlement, fraud, false accounting or theft?

25 **A.** When you say qualifications, I was, in my early days, as

11

1 that correct?

2 **A.** At that time I wrote that statement, that is correct.

3 **Q.** Is it still correct that none of the documents we sent
4 to you help you to recall matters in any way?

5 **A.** Since then, I've had a bit of time. I was actually off
6 sick last week, I spent some time in my sickbed reading
7 up some of these things to prepare for today. There's
8 some that I still don't recognise, still I don't recall
9 but, in general terms, I've done a bit of research
10 since, in my own personal time, I hasten to add, I'm not
11 employed by the Post Office any more.

12 My employer is the Salvation Army. They require
13 me -- there are occasions when I'm on call and I have to
14 be on call, so, in reality, it's, again it's about
15 priorities. I recognise the seriousness of this Inquiry
16 and I understand why it's being done but to ask
17 a layperson, which is what I am right now, these facts
18 and figures, documents, to recall 16 years ago, I find
19 that very difficult.

20 **Q.** If we just look at your witness statement, WITN10540100
21 and look at the bottom of page 2, please, at
22 paragraph 7. Having referred to the transcript, you
23 say:

24 "In addition to this and in answer to all the other
25 subsequent information you have requested from me, I can

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1 a Royal Mail Investigator, I was assigned to Post Office
2 Investigations branch.

3 **Q.** I'm going to ask you about your experience in a moment
4 and your training in a moment. At the moment, I'm just
5 asking about formal qualifications?

6 **A.** I do not have any formal legal qualifications, no.

7 **Q.** When you became an Investigation Manager employed by
8 Post Office Limited, what was your previous experience
9 of conducting investigations; how long had you been
10 doing that for Royal Mail Group before then?

11 **A.** I think it's around five years.

12 **Q.** Can you help us as to roughly when you became
13 an Investigation Manager for Post Office Limited?

14 **A.** I think that's probably around five years as well.

15 **Q.** So about 2003/4?

16 **A.** Yeah, around that time, yes.

17 **Q.** When you were an Investigation Manager for Post Office
18 Limited, where were you based?

19 **A.** I had an office in the Royal Mail Depot at Perth, at
20 53 Feus Road in Perth.

21 **Q.** Was that for the entirety of the period?

22 **A.** Yes.

23 **Q.** Was it an office-based job, ie that was your base to
24 which you would return?

25 **A.** Yes, it was shared with the Royal Mail Investigation

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1 Team. We had the upper floor of a building in that
 2 yard.
 3 **Q.** Were you part of a Post Office Limited Investigation
 4 Team?
 5 **A.** Yes.
 6 **Q.** How many people were in the Post Office Limited
 7 Investigation Team at that time?
 8 **A.** When I commenced?
 9 **Q.** Yes.
 10 **A.** Based in Scotland?
 11 **Q.** Yes.
 12 **A.** On the investigation side, I think it was four
 13 Investigators and a Team Leader.
 14 **Q.** The Senior Investigator, was he or she your line
 15 manager?
 16 **A.** Yes.
 17 **Q.** Do you recall who that was?
 18 **A.** In that short period of time of five years, I had six
 19 different line managers.
 20 **Q.** Were they based in Perth too?
 21 **A.** No.
 22 **Q.** Where were they based?
 23 **A.** One was based in Glasgow, the other five were south of
 24 the border in England.
 25 **Q.** When you were working for Post Office Limited, what did

13

1 a Lead Investigator.
 2 **Q.** That was in Royal Mail Group?
 3 **A.** No, sorry, this was in Post Office Limited.
 4 **Q.** So there was some on-the-job work shadowing; is that
 5 right?
 6 **A.** Absolutely, yes.
 7 **Q.** Was there any formal training?
 8 **A.** Yes, there was.
 9 **Q.** What was the formal training in Post Office Limited?
 10 **A.** Wasn't on Horizon training, when it was introduced.
 11 **Q.** That must have been when you were in the Royal Mail
 12 Group Investigation Department.
 13 **A.** Oh, sorry, when I was introduced to it, I beg your
 14 pardon, that was a play on words there. When I was
 15 introduced to Post Office Limited I was asked to go into
 16 a Crown Office and work shadow some people in there.
 17 **Q.** How long did that training on the Horizon system last?
 18 **A.** I think it was two to three days.
 19 **Q.** What did the training consist of?
 20 **A.** It was watching people serve and watching how they
 21 balanced, what kind of reports the Horizon system could
 22 produce and how to -- if there was an anomaly at the end
 23 of the day, where the balance was out, how to carry out
 24 the checks prior to any dockets or any counterfoils --
 25 before they left the office, to carry out the

15

1 your role as an Investigation Manager consist of?
 2 **A.** I was required to conduct any business which may be
 3 related to suspected criminal activity against Post
 4 Office Limited.
 5 **Q.** Investigations of the type we're going to look into --
 6 **A.** Yes.
 7 **Q.** -- namely alleged conduct by subpostmasters involving
 8 the financial affairs of the Post Office that they were
 9 running, what proportion of your work involved that kind
 10 of investigation?
 11 **A.** You're quite right, there were various other activities
 12 that we would do for external agencies who were
 13 committing fraud against the Post Office. But, in real
 14 terms, I would say -- suggest 65, 70 per cent of the --
 15 there was the kind of activity that we're going to be
 16 discussing, in relation to audit shortages.
 17 **Q.** When you joined Post Office Limited, did you receive any
 18 initial training in the conduct of such investigations?
 19 **A.** Yeah, well, I was carrying over five-years' experience
 20 from Royal Mail. The laws were the same, the different
 21 aspect of it was, instead of investigating crimes
 22 against Royal Mail, it was investigating crimes against
 23 Post Office Limited. So I had a very good mentor, a man
 24 called Peter Webb, who took me under his wing. He took
 25 me out on several inquiries before he allowed me to be

14

1 investigation prior to any of that left the building, so
 2 that the counter clerk had to balance at the end of the
 3 day.
 4 **Q.** That was in a Crown Office?
 5 **A.** Yes.
 6 **Q.** How many counters were there in that Crown Office; can
 7 you remember?
 8 **A.** In Perth Crown Office at that time, I think it was
 9 seven.
 10 **Q.** Did you receive any training about the work of or role
 11 of a subpostmaster in a sub office?
 12 **A.** Yes. Mr Webb was very good because he had some
 13 postmasters with whom he had associated himself with in
 14 the past and he took me round and we visited a few post
 15 offices, he introduced me to the postmaster, and we had
 16 conversations about what went on in that particular
 17 office. Because not every post office sold the same
 18 products. There were some specialist products that some
 19 post offices had that others did not.
 20 **Q.** Did you receive any training on the analysis of data
 21 produced by the Horizon system?
 22 **A.** I believe I did. I -- do you mean ARQs?
 23 **Q.** I'm deliberately asking an open question; I didn't mean
 24 anything in specific terms yet.
 25 **A.** Right, okay. So if we're talking about analysis of the

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1 Horizon system, it's a computer, it's factually based.
 2 If you put in figures and you produce dockets, at the
 3 end of the day, it should balance. If it doesn't
 4 balance, then you carry out an investigation yourself.
 5 The counter clerk should do that or a subpostmaster
 6 should do that on a daily basis.
 7 **Q.** Did you receive any training as to the sources of data
 8 or the varieties of data that could be produced by the
 9 Horizon system --
 10 **A.** Yeah --
 11 **Q.** -- in the event of the need to investigate the conduct
 12 of a subpostmaster or a counter clerk?
 13 **A.** Yes, there were various avenues we could go. There was
 14 a Horizon System Helpdesk where we could gain reports,
 15 if necessary. There was a National Business Centre who
 16 took calls from postmasters --
 17 **Q.** So the HSH, the NBSC?
 18 **A.** -- yes, and, if required, we could go to -- we could go
 19 via our Casework Team down in Croydon and ask them if
 20 they could request from Fujitsu ARQs.
 21 **Q.** How did you go about that then? What did the process
 22 involve with the Casework Team in Croydon?
 23 **A.** Well, we would -- there would be a discussion with my
 24 line manager. The discussion would then -- he'd say,
 25 "Yeah, action that".

17

1 a form before.
 2 **Q.** Okay. The email would be sent to the Croydon team?
 3 **A.** Yes, it would be to a chap called Graham Ward.
 4 **Q.** Yes, who we're going to be hearing from next week.
 5 **A.** Oh, right, good.
 6 **Q.** What would determine in your mind whether it was
 7 necessary to request data from Fujitsu?
 8 **A.** If there was a -- you see, the ARQ provides more than --
 9 it will tell you who was on a stock unit, what they did
 10 on that stock unit, what product was being sold at the
 11 time. So it can prove or disprove information that
 12 could be relevant to you as an individual, as
 13 an Investigator.
 14 It can rule people out of the inquiry because --
 15 I can recall one particular case, it was at another
 16 Crown Office, where it was a busy Crown Office in
 17 Edinburgh, and we were trying to establish who was in
 18 the building at the time, and who was logged on to the
 19 system at the time of whatever event that was. I can't
 20 remember what the event was.
 21 So we requested the data to see who was actually
 22 logged on to the system and what stock units were open
 23 at the time a transaction had taken place. We were able
 24 to identify all the people who were there and logged in.
 25 Now, that's taking into account that they were logged in

19

1 **Q.** Why would there need to be a discussion with the line
 2 manager?
 3 **A.** It's to check understanding that I'm going down the
 4 right road and I'm not wasting resource that might not
 5 be necessary. So it would be to have an overview of the
 6 case, to see if that would be a good thing to do.
 7 **Q.** Was that almost a standing instruction, that, before you
 8 made a request for Horizon data, it had to be discussed
 9 with or cleared by your line manager?
 10 **A.** No, that was my way of dealing with it.
 11 **Q.** Right. It wasn't something that was imposed on you; it
 12 was just your way of working?
 13 **A.** Yeah, it was my way of working, yeah.
 14 **Q.** So you would discuss any request for Horizon data with
 15 your line manager?
 16 **A.** Yes.
 17 **Q.** Yes, you were telling us, you said there was HSH
 18 information available, NBSC information available --
 19 **A.** Yes.
 20 **Q.** -- and you were telling us about getting data from
 21 Fujitsu via the Casework Team in Croydon?
 22 **A.** Yes.
 23 **Q.** Would you fill out a form to do that?
 24 **A.** It would be in the form of an email, I believe, if my
 25 recollection is right. I can't remember ever filling in

18

1 under their own passwords, with their own usernames,
 2 because the system can be manipulated if people share
 3 passwords or share usernames.
 4 **Q.** Other than in a case like that where you've got
 5 potential multiple suspects and you need the ARQ to see
 6 who was logged on for the relevant transactions --
 7 **A.** Yeah.
 8 **Q.** -- what would determine and whether when you would seek
 9 ARQ data? So say a single postmaster in a branch
 10 office --
 11 **A.** Um ...
 12 **Q.** -- what would be the trigger?
 13 **A.** I suppose, if there was a dispute over a transaction or
 14 even if I just wanted clarity within myself to check up
 15 on what was being said was accurate.
 16 **Q.** Said by who?
 17 **A.** Sorry?
 18 **Q.** Said by who? Yes, you wanted to check up if what was
 19 being said was accurate: said by who?
 20 **A.** Yes, if the person who was being interviewed for the
 21 criminal -- potential criminal activity had mentioned
 22 something that required to be corroborated, as it were,
 23 as we use in Scotland, so there was -- if that was
 24 needed to be done, then there were every possibility
 25 where I would have requested ARQ data for that type of

20

1 event.

2 **Q.** Did you ever regard the ARQ data as being a necessary

3 element of your case, in every case of proposed

4 prosecution of a subpostmaster, because it was the data

5 necessary to prove the loss?

6 **A.** No.

7 **Q.** What else was sufficient in your mind to prove the loss?

8 **A.** We're going to come on to the Paible case just in

9 a second but, if during the course of the Inquiry, there

10 was a suspicion that something had a -- a fictitious

11 transaction had gone through, that would have required

12 a document to be sent to an agency. There's

13 a possibility, by approaching that agency for the

14 particular to docket to support the transaction, we

15 would have been able to recover that, maybe not in its

16 actual original content, but a facsimile copy because

17 a lot of businesses, when they receive all these pieces

18 of paper, they immediately just photocopy them and, if

19 you asked them to provide it, that's in the form it

20 would come -- it would come back in the form of

21 a facsimile of the original document, which is not best

22 evidence but is the best that is available.

23 **Q.** In your role as Investigation Manager, did you undertake

24 any training specifically about duties of disclosure of

25 information and evidence?

21

1 **Q.** The "offender": do you mean the suspect?

2 **A.** Sorry.

3 **Q.** Because it's assuming a bit too much, isn't it?

4 **A.** It's been a long time, Mr Beer. Sorry.

5 **Q.** So whether it pointed towards or away --

6 **A.** Yes.

7 **Q.** -- from the guilt of the suspect?

8 **A.** Yes.

9 **Q.** How did you go about giving such disclosure in a case

10 that was to be prosecuted in Scotland?

11 **A.** It would be in the form of a production document, where

12 all the documents would be listed that had been used in

13 the course of the investigation, ensuring that all

14 documents, whether used or not in the actual report, so

15 that when the Prosecution Authority in Scotland -- is

16 the COPFS -- if they -- when you present that to them,

17 that's what the prosecutor has. He -- if you don't give

18 them everything, then he doesn't know everything, you

19 know, and it's clear to me that -- and I believe that

20 I followed that through.

21 **Q.** Can I break that down a little bit, then.

22 **A.** Yeah.

23 **Q.** At what stage in the process would you pass to the

24 Procurator Fiscal the list of productions consisting of

25 what we call unused material, namely documents that

23

1 **A.** It would have been covered in my training, yes.

2 **Q.** Which training?

3 **A.** Royal Mail training because that was my original role

4 for five years.

5 **Q.** What, therefore, by the time you got to the Post Office

6 role in 2003/4, did you understand your duty of

7 disclosure or revelation to entail?

8 **A.** Yeah, if I was the Investigation Manager and -- my

9 understanding is that my role as Disclosure -- if I was

10 there the appointed Disclosure Officer, if it was

11 a complex inquiry, there was a possibility that

12 a separate Disclosure Officer would be appointed but, in

13 normal circumstances, in normal investigations, the

14 Investigation Manager would also become the disclosure

15 person.

16 **Q.** Yes, so that's about the role. Sometimes in the less

17 complex investigations you would double hat --

18 **A.** Yes.

19 **Q.** -- is that right?

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

21 **Q.** Okay and what did you understand your duties as

22 Disclosure Officer to entail?

23 **A.** To disclose all material where it showed bias towards

24 the offender or bias for the offender. It was to make

25 sure that all the documents that were available were --

22

1 you're not using to seek to establish the guilt of the

2 suspect?

3 **A.** Now, this is where there are -- different Procurator

4 Fiscals work in different ways. They all work to the

5 same rules but some of them don't like to receive the

6 productions until nearer the trial, right.

7 **Q.** This is what I want to investigate with you --

8 **A.** Okay.

9 **Q.** -- namely, on what material the Procurator Fiscal makes

10 a decision to prosecute?

11 **A.** Well, when he's given us the instruction that he

12 requires the productions to be sent to him, it can be

13 four or five weeks before the trial; it could be two

14 weeks before the trial. Different Procurator Fiscals

15 worked in different ways, that's what I'm trying to say,

16 Mr Beer.

17 **Q.** Is it right, trying to cut through this, that the

18 Procurator Fiscal made decisions to prosecute on the

19 basis of a report, rather than the productions, the

20 underlying material?

21 **A.** Yes.

22 **Q.** So, unlike perhaps in England, they don't see the

23 underlying material at the point of making the decision

24 to prosecute?

25 **A.** Yeah.

24

1 Q. That comes later; is that right?
 2 A. If you're talking about the Post Office Limited decision
 3 to prosecute, we would submit the file to the Criminal
 4 Law Team down in Croydon. They would then send that to
 5 the -- the report to the Designated Prosecution
 6 Authority, which was a person -- a Senior Manager within
 7 Post Office Limited Investigation Team.
 8 Q. Yes, we're going to see that in a minute and we can see,
 9 in this case, it was Mr Pardoe?
 10 A. Yes, correct, and Mr Pardoe would then give the nod and
 11 the wink to go ahead with the prosecution and submit the
 12 report to the Procurator Fiscal.
 13 Q. We're jumping ahead a little bit.
 14 A. Sorry.
 15 Q. You referred to it as a "nod and a wink".
 16 A. Yes.
 17 Q. Is that what it consisted of or did it consist of
 18 a detailed analysis of the merits of the evidence?
 19 A. I'm not sure what the DPA -- the Designated Prosecution
 20 Authority, what he understood, but he would be in
 21 possession of the case file, so that he could review the
 22 case file and to see whether he was satisfied that it
 23 complied with Post Office Limited --
 24 Q. So there's two stages, one which is internal to Post
 25 Office --

25

1 A. Okay.
 2 Q. If a person is going to make a decision based on
 3 a summary, ie the report that you're writing for them,
 4 in order for them to make a fair and balanced decision,
 5 you've got to reflect all of the evidence fairly,
 6 whether it points towards or away from the guilty of the
 7 suspect, haven't you?
 8 A. Yeah. If I can just add some value here, because it's
 9 just come in my head there just now, is that there were
 10 occasions where a Procurator Fiscal would call you in to
 11 discuss matters, like you're talking about, and he may
 12 have, in the past, asked you to bring the evidence with
 13 you, so that would be a review. That didn't happen in
 14 every case though.
 15 Q. During your time as an Investigation Manager you were
 16 involved in investigating other Scottish cases, other
 17 than that of William Quarm, yes?
 18 A. Yes.
 19 Q. How many before William Quarm's?
 20 A. Oh, err --
 21 Q. Just in Post Office Limited.
 22 A. In the five years, probably -- can I just say, I had one
 23 big case which took me nine months and it was a massive
 24 case, almost £500,000, and that took up an inordinate
 25 amount of my time, that one particular case. So, in

27

1 A. Yes.
 2 Q. -- where the Designated Prosecution Authority, call it
 3 Mr Pardoe, is making a decision whether, essentially, to
 4 pass the papers on to the Procurator Fiscal?
 5 A. Correct.
 6 Q. Then the second stage is, when it gets to the Procurator
 7 Fiscal, I'm just at the moment looking at that second
 8 stage --
 9 A. Okay.
 10 Q. -- at that second stage, they got a report, is that
 11 right, rather than evidence?
 12 A. Correct.
 13 Q. Did you understand, therefore, the importance of
 14 including in the report all material or reference to all
 15 material, whether it pointed towards the guilt of the
 16 suspect or away from such guilt?
 17 A. Yes, I was aware of that.
 18 Q. Because, unlike in England, if they're not looking at
 19 the underlying material themselves, that's got to be
 20 included in the report for them to make a fair and
 21 balanced decision, hasn't it?
 22 A. I've never prosecuted -- I've never been the lead
 23 Investigation Manager in an English case, so I can't do
 24 the comparison that you're talking about.
 25 Q. Well, let's just stick to Scotland, then.

26

1 real terms, probably 20. That's a guess. That's
 2 an absolute guess.
 3 Q. So 20 in five years?
 4 A. Yes.
 5 Q. I should have asked at the time: the other people in
 6 Post Office Limited Investigation working in Scotland,
 7 were they, like you, former postmen?
 8 A. I think most Investigators had come through the ranks,
 9 if you like, at various stages, whether they were
 10 postmen or whether they were counter clerks or whether
 11 they were -- they would have been -- you were normally
 12 not headhunted but it would be somewhere in your
 13 development plan.
 14 Q. Did you receive any training or instruction on Scottish
 15 law?
 16 A. Yes.
 17 Q. When was that?
 18 A. Oh, I think it's -- it's actually a bone of contention
 19 for me because when -- the majority of training of any
 20 type, either Royal Mail or Post Office Limited, we were
 21 always -- the training would be held in England, at the
 22 end of every session or every session of training,
 23 I would ask the question, "So what is the difference?
 24 How can we apply these rules to Scotland?" and the
 25 people who were training said, "Well, you can learn by

28

1 experience".

2 There was not any great level of training. I do
3 remember having some Procurator Fiscals at some point
4 coming in and speaking to the team in Scotland but that
5 was rare, in fact very rare. I think it only happened
6 once.

7 **Q.** So there was any one occasion you remember, in the time
8 you were in Scotland, getting --

9 **A.** I can't -- sorry.

10 **Q.** -- bespoke training on Scottish law?

11 **A.** Yes.

12 **Q.** Now, I think, by the time you came to William Quarm's
13 case, is it right that there were just two of you
14 investigating cases in Scotland?

15 **A.** I think that's correct and it was Mr Daily and myself.

16 **Q.** Yes, that's what he told us yesterday, Mr Daily, that by
17 2008/9 there were just two of you. Why were there just
18 the two of you investigating cases in Scotland?

19 **A.** During my time in both Royal Mail and at Post Office
20 Investigations there were lots of occasions where there
21 was headcount reductions, where people had to apply for
22 their own job and whether you were successful or not
23 determined whether you remained in the security industry
24 or the Security Team.

25 **Q.** Is that what eventually happened to you in 2009?

29

1 **Q.** Yes. The breadth of that statement, you were not aware
2 of any operational difficulties with Horizon at all
3 after it had been introduced into an office; is that
4 correct?

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

6 **Q.** So were there no prior cases in which you were
7 an Investigator where issues or concerns over Horizon
8 were raised?

9 **A.** I don't recall any.

10 **Q.** Do you remember any suggestions being made by
11 subpostmasters in other cases that Horizon had created
12 errors that could have caused cash shortages or
13 balancing problems?

14 **A.** At that time, no.

15 **Q.** Did you receive any information from others in the
16 organisation, whether from Senior Managers or
17 Executives, cascaded down to you, as to the reliability
18 or unreliability of Horizon?

19 **A.** I do know that when -- on occasion where I required to
20 satisfy myself that would request a statement from
21 Fujitsu to say that the computers were working normally
22 at the time of the transaction, or transactions, and
23 that was to satisfy myself that there wasn't an issue
24 that could -- I mean, computers are computers.

25 **Q.** What do you mean by that, "computers are computers"?

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1 **A.** That's exactly what happened to me in 2009.

2 **Q.** So in the case of William Quarm's investigation, he told
3 us that you were the Lead Investigator and he was the
4 Second Officer; is that right?

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

6 **Q.** Then, when you left, the file was transferred to him; is
7 that right?

8 **A.** My understanding now is that's what happened. I think
9 all my files were pending -- were transferred to the
10 last Investigator in Scotland, which was Mr Daily.

11 **Q.** In your Inquiry witness statement, you make no reference
12 to any awareness of subpostmasters experiencing issues
13 or problems with the Horizon system and you tell us in
14 your witness statement, "At no time was there any
15 suggestion that the Horizon computer system had created
16 any errors which could have caused resultant cash
17 shortages"; is that right?

18 **A.** Are we talking about in Paible Post Office?

19 **Q.** No, you're talking generally here?

20 **A.** Oh, generally, right. Okay. I was not aware of any
21 instance where anybody had pointed out to me that
22 Horizon was causing issues. I believe that on -- when
23 it was being introduced to offices, there were technical
24 difficulties but I'm not aware of any operational
25 difficulties, if you understand what I mean by that.

30

1 **A.** Well, you get glitches in every computer. I mean, we've
2 had a few in this particular Inquiry yourself where the
3 screens go blank and various other different things. It
4 happens but I'm not aware of anything that was pointed
5 out to me by any individual.

6 **Q.** Why were you seeking statements from Fujitsu to prove
7 that the computer was working properly?

8 **A.** Sometimes you like to be thorough and covering all --

9 **Q.** You like to be thorough all the time, don't you, as
10 an Investigator?

11 **A.** Yeah, absolutely, but what you're doing is that you're
12 making sure that you've got to cover all the bases,
13 that, if you're an Investigator, you're expected to take
14 reasonable lines of inquiry; I think that's a reasonable
15 line of inquiry.

16 **Q.** So reasonable line of inquiry is obtaining an evidential
17 foundation that the computer that produced the data that
18 you relied on to prove a loss was working properly?

19 **A.** Well, it can prove a gain as well. So, I mean, it can
20 also -- if there are things that are not correct in the
21 office balance and the postmaster is denying
22 culpability, which he's quite entitled to do, then, you
23 know, you satisfy yourself that "Is there a problem that
24 I'm not aware of", and you would seek reassurance that
25 there's nothing else that could have caused it.

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1 Q. So just back to my question, then. You did regard it as
 2 a reasonable line of inquiry to obtain evidence that
 3 showed that the computer was working properly?
 4 A. Yes.
 5 Q. What would determine whether you decided to be thorough
 6 and got such evidence or decided not to get such
 7 evidence?
 8 A. I honestly don't know the answer to that one.
 9 Q. Because we know that in Mr Quarm's case you didn't?
 10 A. Well, I wasn't given the opportunity, is more to the
 11 truth.
 12 Q. Who denied you the opportunity?
 13 A. The fact I was made redundant.
 14 Q. When you put the case up for prosecution, though, you
 15 hadn't obtained any such evidence, had you?
 16 A. Does it not say that -- something about the ongoing
 17 inquiries?
 18 Q. Well, we'll get to that but, by the time you put the
 19 report up for prosecution, you hadn't obtained such
 20 evidence?
 21 A. I had to get that report in within 12 days.
 22 Q. So let's take it in stages.
 23 A. I think it actually says that there are further lines of
 24 inquiry.
 25 Q. Was that going to be one then? Is that what you're

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1 A. I think I've already referred to it in my previous
 2 answer, was that I was taken out of the Security
 3 Investigation Team, I was actually, in my words, put on
 4 gardening leave and I spent the Christmas of that year
 5 stocking shelves in a Crown Office.
 6 Q. Can we look, please, before we move to Mr Quarm's case,
 7 to something that happened before you started his
 8 investigation, at POL00093246. You'll see, if we go to
 9 the third page, please, this is a document authored by
 10 you on 3 April 2002; can you see that?
 11 A. Yes.
 12 Q. If we go back to the first page, please. We can see
 13 from the first line it's about the Raeburn Place sub
 14 post office; can you see that?
 15 A. Yes.
 16 Q. Is that a suburb of Edinburgh?
 17 A. Yes.
 18 Q. It's about the alleged loss of £52,300-odd pounds, yes?
 19 A. Correct.
 20 Q. If we can look at the second paragraph, which is on the
 21 page there, thank you, it is now at the top of the page:
 22 "An examination of the cash accounts for ... Weeks
 23 25 ... to week 27 indicate that weekly shortages and
 24 overages were simply carried over to the next accounting
 25 week. The cash account weeks in which the three large

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1 saying?
 2 A. Well, I mentioned earlier about the recovery of dockets
 3 from other agencies with whom the Post Office has
 4 contracts. That would have been one of the avenues that
 5 I would have explored.
 6 Q. I'm asking about the Fujitsu evidence. Are you saying
 7 that a line of inquiry that you're referring to in your
 8 report, which says that there are further inquiries
 9 outstanding, or words to that effect, was to obtain
 10 evidence from Fujitsu?
 11 A. It would have been something that would have been
 12 a reasonable thing to do, yeah.
 13 Q. Why would it have been a reasonable thing to do?
 14 A. Because it would have shown the transactions and all the
 15 other things that were not available to me from the
 16 branch trading statements, which was all I had.
 17 Q. I think you, in fact, know from reading the documents
 18 that was never done, was it?
 19 A. Reading the documents, no.
 20 Q. No ARQ data was obtained?
 21 A. I've read the production schedule and you're correct --
 22 quite right there.
 23 Q. No witness statements from Fujitsu obtained?
 24 A. No.
 25 Q. Do you know why that was?

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1 shortages occurred were examined and compared to other
 2 accounting weeks. There were no apparent reasons for
 3 the losses identified."
 4 Yes?
 5 A. Correct.
 6 Q. Then if we read the next paragraph:
 7 "During the time that the office was being defunded
 8 a document was discovered within the office believed to
 9 be in Miss Saleem's handwriting [I think she was the
 10 subpostmistress]. This document would appear to be
 11 a response to the recovery of the shortages due to the
 12 Post Office ... Miss Saleem indicates that the problem
 13 would appear to be 'gletches ...'"
 14 I think that's glitches; is that right?
 15 A. I think it's a Scottish colloquialism,
 16 gletches/glitches, it's the same word.
 17 Q. "... in the system" she indicates that she was told
 18 this by the Helpdesk. It has not been possible to
 19 identify who from the Helpdesk is giving out this
 20 information. It does, however, give concern to Post
 21 Office Security that operators are being advised that
 22 the Horizon system is faulty and produces inaccurate
 23 results. This document is being held by Lothian and
 24 Borders Police as a production of evidence."
 25 If we go to page 3, please. You say that what was

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1 happening was:
 2 "... contrary to the Losses and Gains Policy ... to
 3 allow several large shortages to be held in suspense ...
 4 guidelines state that all subsequent losses should be
 5 made good immediately."
 6 If we just go back to third paragraph on page 1, you
 7 say that it's of concern that people in the Helpdesk are
 8 telling postmasters that the Horizon system is faulty,
 9 yes?
 10 **A.** Yes, that's what it says, yes.
 11 **Q.** Why was it a concern that people in the Helpdesk were
 12 telling subpostmasters that the Horizon system they were
 13 using was faulty?
 14 **A.** I mean, this is 2002. It's --
 15 **Q.** 2001, I think, the incident was, and your report is
 16 April 2002?
 17 **A.** Okay, so this is now 23 years on. I have got very
 18 little recollection of this but it would be a concern at
 19 that time. I don't know when Raeburn Place got their
 20 Post Office or Horizon equipment installed. If this is
 21 around 2001, that would sort of tie in with that, but --
 22 **Q.** Are you saying we might be able to write this up as
 23 a technical difficulty in installation?
 24 **A.** I really don't know because, once I saw that the
 25 outcome -- that three large losses were placed in the

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1 **A.** I think what I'm saying is if it's found that the
 2 Helpdesk are passing out that type of information to
 3 individuals, they perhaps should be reporting it in the
 4 other direction, so that the senior management team or
 5 their line managers can be -- it could be looked at to
 6 see if there is an issue. But to just tell the
 7 postmasters that there's glitches in the system without
 8 a name, without a reason, and just to put it down in
 9 a bland statement like "there's glitches in the system",
 10 it's not helpful. I mean, the Helpdesk is there to
 11 provide help, not to give opinions.
 12 **Q.** Was that your concern, that they shouldn't be saying
 13 things like this?
 14 **A.** I mean, the actual quote that I've highlighted, I can't
 15 recall actually typing this document but I must have
 16 done because it's got my name against it, but I really
 17 can't give you much more, Mr Beer. Sorry.
 18 **Q.** It reads, do you agree, as if you're saying the problem
 19 isn't that there might be glitches in the system; the
 20 problem is that somebody is saying that there are
 21 glitches in the system?
 22 **A.** Yeah, I can see where you're coming from, yeah.
 23 **Q.** As an Investigator, that was something that you would
 24 need to investigate, whether, in fact, there were
 25 glitches in the system which were relevant to

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1 suspense account, to do that you need authorisation,
 2 and --
 3 **Q.** You're critical of Post Office staff for doing that
 4 without authorisation, at the end of the report,
 5 I think?
 6 **A.** Yeah, but Mr -- the Retail Line Manager, that became
 7 a Retail Line Manager. That, to me, was not a criminal
 8 activity; that was something that was fundamentally
 9 wrong with the way -- in fact, I think I recommended
 10 that Mr Athwal was subject to some kind of disciplinary
 11 action, I think it says on the last paragraph, because
 12 that should never happen -- should never happen.
 13 **Q.** I'm more interested in the --
 14 **A.** In the glitches.
 15 **Q.** -- why Post Office Security would be concerned that the
 16 Helpdesk are telling people that the Horizon system is
 17 faulty and produces inaccurate results. Why would that
 18 be a concern to Post Office Security Department?
 19 **A.** I think because it brings the integrity of the Horizon
 20 system into question at a very early stage of its
 21 inception.
 22 **Q.** Why is that a concern?
 23 **A.** I think for -- knowing what we know now, yes, I think it
 24 most certainly was a concern.
 25 **Q.** Yes, but why was it a concern at the time?

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1 Miss Saleem's case, wouldn't you?
 2 **A.** I think, because I passed it back to the Retail Line
 3 Manager team and I've highlighted it in my report to the
 4 Retail Line Manager's team, I would have expected them
 5 to follow that through, because this -- I was a Criminal
 6 Investigator, this was not a criminal offence.
 7 **Q.** Why was this not a criminal offence?
 8 **A.** Because of the way that the Retail Line Manager had
 9 dealt with it.
 10 **Q.** What, they had authorised --
 11 **A.** Yes.
 12 **Q.** -- the retention of the £50,000-odd in suspense?
 13 **A.** Yes.
 14 **Q.** Would that, in your view, preclude a criminal
 15 investigation?
 16 **A.** Well, it's certainly not helping.
 17 **Q.** Why does it not help, that there's been in authorisation
 18 to hold the money in suspense?
 19 **A.** Well, it says there that -- the Losses and Gains Policy
 20 that the loss should be held in a suspense account for
 21 a maximum of eight weeks. This exceeded that, so,
 22 therefore, there was a loss of information, there was
 23 loss of data, there was a loss of dockets, there was
 24 a loss of lots of what would be important evidence to
 25 have been protected. The fact that --

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1 **Q.** Why would that evidence have been lost?
 2 **A.** Because if you're -- when you're balancing at the end of
 3 the day or the end of the week, you're required to check
 4 all the dockets, all the foils, all the -- at that
 5 particular time there would be foils from payment order
 6 books, which were the old pension payment dockets. They
 7 would all have been sent away. They would now no longer
 8 be available for me to get any meaningful investigation
 9 to try to enquire why or how this came about. So there
 10 was a loss of evidence due to the inaction of the Retail
 11 Line Manager, Mr Athwal, and --
 12 **Q.** Drawing it out more broadly, would you say that
 13 agreement by a Retail Line Manager to hold money in
 14 suspense essentially precludes a criminal investigation?
 15 **A.** Not in every case but, in this particular case, when
 16 there are three large ones, I would think that it's
 17 certainly a major breach of the Losses and Gains Policy.
 18 **Q.** When I asked you a moment ago about whether you had
 19 heard whether there were any suggestions that the
 20 Horizon computer system had created errors that could
 21 have caused cash shortages, and you said no, in fact the
 22 answer would be yes, because this document shows that
 23 you had?
 24 **A.** Yes.
 25 **Q.** Were there other occasions in the run-up to Mr Quarm's

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1 **SIR WYN WILLIAMS:** Hang on, Mr Beer, there's just one phrase
 2 I'd like to ask a question about on that document. It's
 3 back on the second page where Mr Grant is relaying the
 4 concern of Post Office Security.
 5 **MR BEER:** I think that's the third paragraph.
 6 **SIR WYN WILLIAMS:** Yes.
 7 **MR BEER:** If we scroll down. Thank you. So it's "During
 8 the time".
 9 **SIR WYN WILLIAMS:** Yes, that's the paragraph.
 10 You'll see, Mr Grant, the last-but-one sentence:
 11 "It does however give concern to Post Office
 12 Security ..."
 13 Now, I've taken that to mean that you were not there
 14 expressing your personal concern but a wider concern; is
 15 that correct?
 16 **A.** As a member of the Post Office Security Team, yes, I do
 17 believe -- yes.
 18 **SIR WYN WILLIAMS:** So who is covered in this document by
 19 that expression "Post Office Security"? Does that mean
 20 your colleagues in Scotland? Does the mean something
 21 wider than that? Explain it to me.
 22 **A.** I believe what I'm talking about there is the broad
 23 spectrum of the whole of Post Office, because we kept on
 24 changing titles, so Security Investigation, Fraud Team,
 25 it's -- at that time in 2002, I think we were all listed

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1 investigation, in the five years or so that you were
 2 working for Post Office Limited, in which people raised
 3 problems or glitches with the Horizon system?
 4 **A.** I can't recall any.
 5 **Q.** In this case, in Raeburn Place, are you essentially
 6 saying that this wasn't a matter for you to investigate
 7 because this was being sent back to the Retail Line
 8 Manager chain for recovery, presumably as a civil
 9 matter?
 10 **A.** I think -- could you go back to the top of the report
 11 for me, please?
 12 **Q.** Yes, of course.
 13 **A.** Thank you.
 14 **Q.** If we just scroll up, please.
 15 **A.** I think this is a report going back to the Retail Line
 16 to say -- basically say "I've had a look at this, I'm
 17 not comfortable with it", although it doesn't say it in
 18 those words, "There were breaches of policies and
 19 procedure by the Retail Line Manager and I'm sending it
 20 back to them to take ownership of it".
 21 **Q.** Do you know what happened as a consequence of your
 22 report?
 23 **A.** No, I don't.
 24 **Q.** Okay, that can come down. Thank you.
 25 Can we look please --

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1 as Post Office Security. So my comment there, "It does
 2 however give concern to Post Office Security", is for
 3 the overall team, nationwide.
 4 **SIR WYN WILLIAMS:** I'm sorry to be pedantic. Does
 5 "nationwide" equal Scotland or does "nationwide" equal
 6 UK?
 7 **A.** Sorry, you're quite right. Because we're all separate
 8 nations. It would be the UK.
 9 **SIR WYN WILLIAMS:** Thank you. Yes.
 10 **MR BEER:** Thank you, sir, can we move on, please, to another
 11 document -- again, this is in the run-up to the
 12 investigation of William Quarm -- and look at
 13 POL00113067. This is, essentially, a schedule of
 14 documents prepared for disclosure in the course of other
 15 litigation and it describes what the document is in the
 16 second column. It gives a control number in the first
 17 column and then, in the third column, it sets out
 18 an extract or extracts from the document. I just want
 19 to use this to look at what is said to be within
 20 a document by looking at the second page, please. It's
 21 the box at the bottom, please, the third box down. If
 22 we can just blow that up, please.
 23 Thank you. So the document is a "Casework
 24 Management Report for the case of", and then a cipher
 25 has been applied, that's because it's somebody who is

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1 not caught up in this Inquiry:
 2 "... written by Shirley Stockdale, Investigation
 3 Manager, and dated 2 December 2003."
 4 So this is, essentially, an extract from a document,
 5 which it is said Shirley Stockdale wrote back in
 6 December 2003. Do you remember Shirley Stockdale?
 7 **A.** Yes, I do.
 8 **Q.** Was she a colleague of yours in a Scottish element of
 9 the Post Office Security --
 10 **A.** Yes, she was an Investigation Manager, the same grade as
 11 myself. Yes.
 12 **Q.** So this is before the cut down from four or five of you
 13 down to two?
 14 **A.** Well, yeah, yeah, exactly so, yeah. We had so many of
 15 them it was difficult.
 16 **Q.** What she's reported as saying is:
 17 "Because B190 [that's the person] was declaring his
 18 losses it was felt that there was no criminal intent and
 19 that there somehow must be a procedural error taking
 20 place.
 21 "Arrangements were made for myself [Shirley
 22 Stockdale] and [you] Raymond Grant to attend the
 23 training suite at Springburn DMB" --
 24 So I think a DMB is a directly managed branch; is
 25 that right?

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1 **A.** I didn't until I'd read this but I do remember the
 2 incident of -- or the actual action that we took, and
 3 I remember going and doing this with Shirley Stockdale.
 4 What we were trying to do was, based on the information
 5 that Shirley had and the information that we had from
 6 the previous cash accounts, was to reconstruct using
 7 training equipment, Horizon training equipment, which
 8 was based in a room -- it's called the training suite
 9 there -- and, without having read that, I wouldn't have
 10 recalled it but I do remember actually doing that.
 11 **Q.** The first paragraph there suggests that this was being
 12 done because the postmaster was declaring his losses
 13 and, therefore, it wasn't to be treated as crime?
 14 **A.** Yeah.
 15 **Q.** Can you explain that: because the postmaster was
 16 declaring losses, that equates to not treating this as
 17 crime or having a criminal intent?
 18 **A.** To determine whether it's a crime, you would look at
 19 what efforts have been made to disguise this, this
 20 postmaster was being upfront. He was publishing in his
 21 accounts what was -- his end results were. I can't
 22 recall the case, I don't even remember the name of the
 23 office, but it would be one of those where I think it
 24 would require the Retail Line Manager to take ownership
 25 of.

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1 **A.** That's correct.
 2 **Q.** Springburn is part of Glasgow?
 3 **A.** Yes, it's a suburb of Glasgow, yes.
 4 **Q.** So the pair of you had arrangements made for you to
 5 attend the training suite at this directly managed
 6 branch in Springburn:
 7 "... where we attempted to reconstruct the cash
 8 account for the weeks immediately prior to the audit in
 9 an attempt to establish what effect this practice of
 10 redeclaring the cash at a higher value would have on the
 11 actual cash account, it was suggested that the loss may
 12 have been inadvertently 'doubled up', however the
 13 exercise at the training suite has disproven this and as
 14 far as enquiries have revealed to date the only thing
 15 that is sure is that the deficit of [£38,800-odd]
 16 realised at audit is not as a result of any errors that
 17 we are aware of at this time. It would appear to be
 18 missing cash for which neither of the staff or the
 19 subpostmaster can give any explanation."
 20 Just looking at this -- and I realise this is
 21 an extract where you don't have the whole context of the
 22 document and you don't have the identity of the
 23 subpostmaster concerned -- do you remember this,
 24 attending a training suite and trying to reconstruct
 25 an error that a postmaster had alleged?

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1 **Q.** So, again, this one that wouldn't go down the crime
 2 route?
 3 **A.** I'm guessing because it wasn't -- I was only there to
 4 corroborate what Shirley Stockdale was trying to do and
 5 help if I could, because the two of us were -- we were
 6 pretty much the same level of experience.
 7 **Q.** Do you remember, in your time before 2009, this being
 8 an issue that was raised more than once, ie the system
 9 inadvertently doubling up figures?
 10 **A.** I'd heard about operator error, when you're trying to
 11 resolve an issue and, if you didn't do the process
 12 correctly, it would result in a duplication of the loss
 13 or whatever it was you were trying to do. But that was
 14 put down to operator error, not following the procedure
 15 to remove the money from one place to another or to
 16 resolve the difficulty that had been identified.
 17 **Q.** I'm thinking about the thing that's described here as
 18 "inadvertent doubling up". Had you heard about that in
 19 other cases --
 20 **A.** Not inadvertently, no.
 21 **Q.** -- before you left in 2009?
 22 **A.** No, I had not, no.
 23 **Q.** Other than attending the training suite and trying to
 24 replicate what the postmaster had alleged, can you
 25 recall whether any other investigations were carried out

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1 in relation to this alleged procedural error?
 2 **A.** For this particular event? No, I've no idea.
 3 **MR BEER:** Thank you. That can be taken down.
 4 Sir, it's 11.20 now. That might be an appropriate
 5 moment for the morning break.
 6 **SIR WYN WILLIAMS:** Yes.
 7 **MR BEER:** Can we break until 11.35 please?
 8 **SIR WYN WILLIAMS:** Yes.
 9 **MR BEER:** Thank you very much.
 10 **(11.19 am)**
 11 **(A short break)**
 12 **(11.35 am)**
 13 **MR BEER:** Sir, good morning. Can you continue to see and
 14 hear us?
 15 **SIR WYN WILLIAMS:** Yes, thank you very much.
 16 **MR BEER:** Thank you very much.
 17 Mr Grant, how would you describe your role in the
 18 Post Office Investigation Department, in terms of your
 19 relationship with the Procurator Fiscal?
 20 **A.** There was never a single Procurator Fiscal because
 21 they're very regionally based. I think there are 11 in
 22 total in Scotland.
 23 **Q.** I should say that I'm referring to the Procurator Fiscal
 24 as meaning the office of?
 25 **A.** Oh, right, sorry. I beg your pardon.

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1 statement, I think we referred you to a document, a Post
 2 Office document, called "Investigation Policy,
 3 Disclosure of Unused Material -- Criminal Procedure and
 4 Investigations Act 1996 Codes of Practice". I wonder
 5 whether we could just look at that, please. It's
 6 POL00104762.
 7 If we just look at the foot of the page first. We
 8 can see it's dated May 2001. If we go up the page to
 9 the top, please, you can see the title. Just reading
 10 that document and the purpose of it, is this a policy or
 11 a procedure document that would have applied to your
 12 work when you were an Investigator in Royal Mail Group?
 13 **A.** Yes.
 14 **Q.** Is it a document that would have applied to your work
 15 when you moved to the Post Office?
 16 **A.** I believe it would, yes.
 17 **Q.** Can we look, please, at the bottom of the page,
 18 paragraph 3.2. If we scroll down to the second bullet
 19 point from the bottom:
 20 "Investigators and Disclosure Officers must be fair
 21 and objective and must work together with prosecutors to
 22 ensure that disclosure obligations are met. A failure
 23 to take action leading to proper disclosure may result
 24 in a wrongful conviction. It may alternatively lead to
 25 a successful abuse of process argument or an acquittal

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1 **Q.** So Procurators Fiscal?
 2 **A.** Yeah, it's a difficult plural. We would be there, we
 3 would submit a report. Initially, it was done via
 4 a written report, subsequently there was an electronic
 5 version brought in. I can't remember --
 6 **Q.** 2006 onwards?
 7 **A.** I think it was 2006, around about that time. And we
 8 would submit -- if I stick with the written report first
 9 of all, the written report would contain the relevant
 10 information that we would think that the Procurator
 11 Fiscal would need to do, or Procurators Fiscal would
 12 need to initiate. They would then probably come back to
 13 you on -- either on a personal basis or you would -- you
 14 could even -- might be invited to go and see them at
 15 their premises and explain what it is you were trying to
 16 do. That didn't happen in every case. Sometimes they
 17 just took your documents as being accurate and
 18 reasonable for them to make progress on what they were
 19 going to do with it.
 20 **Q.** Assuming they took a case on and prosecuted it, what
 21 format would the communication occur in after that? Was
 22 it by meeting, email or more formal written
 23 communications?
 24 **A.** I think it would be a combination of all of those.
 25 **Q.** In the process of us asking you to write your witness

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1 against the weight of evidence."
 2 Then, over the page, please. If we go to the third
 3 bullet point from the bottom:
 4 "Disclosure Officers must specifically draw material
 5 to the attention of the Prosecutor for consideration
 6 where they have any doubt as to whether it might
 7 undermine the prosecution case or might reasonably be
 8 expected to assist the Defence disclosed by the
 9 accused."
 10 Do those two paragraphs fairly reflect your
 11 understanding of the duties of disclosure when you were
 12 investigating cases in Scotland?
 13 **A.** Yes.
 14 **Q.** These, I think, are mirrored in a document that applies
 15 to all Specialist Reporting Agencies, as they were
 16 called, in Scotland. If we can look at that, please,
 17 WITN10510102. So this isn't a Royal Mail Group or Post
 18 Office publication; it's a publication of the Crown
 19 Office and it applies as a guide to all so-called
 20 Specialist Reporting Agencies.
 21 If we can look, please, at page 5., just to see what
 22 it's about. The foreword by the then Lord Advocate,
 23 Lord Boyd:
 24 "I am pleased to be able to provide you with
 25 [a guide with that title].

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1 "Over fifty agencies other than the police report
2 cases to Procurators Fiscal each year ...
3 "This requires understanding on the part of the
4 Procurators Fiscal to of the relevant legislative
5 provisions and appreciate of the role and functions of
6 the reporting agencies. The other essential ingredient
7 is that the reporting agencies follow best practice in
8 the investigation and reporting of cases to Procurators
9 Fiscal and in preparation for the giving of evidence by
10 their officers in court."

11 Then, just over the page, lastly:

12 "The purpose of the guide is twofold:

13 "1) to assist the Specialist Reporting Agencies in
14 knowing exactly what the Procurator Fiscal requires ...
15 and to provide some indication of how trials are
16 conducted in Scotland; and

17 "2) to identify and to address common problems in
18 reporting and prosecuting such cases which more often
19 than not involve employees or members of Specialist
20 Reporting Agencies."

21 Was this a guide with which you would have been
22 familiar, from at least 2002/3 onwards, when you took
23 over responsibility for investigations -- or became part
24 of the team in Post Office Limited?

25 **A.** I'm familiar with the document and I would have read it
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1 it contributes to the evidence against an accused person
2 or is in his or her favour. Procurators Fiscal proceed
3 in the public interest which necessarily connotes
4 a broader approach than the wishes of the reporting
5 agency alone."

6 Is that something you would have understood as
7 an obligation on you in the Post Office Investigation
8 Department?

9 **A.** Yes.

10 **Q.** That fairly reflects the policy document that I showed
11 you, the internal policy document, agreed?

12 **A.** Yes.

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

14 So how was that obligation, how were those duties
15 discharged in the case of any material that may show
16 that Horizon was not functioning properly?

17 **A.** I mean, if I was aware of an issue or a problem or
18 a difficulty with any aspect of the report that I was
19 preparing for a Procurator Fiscal, that would be
20 declared in the substance of the report. If it wasn't,
21 then that would be remiss of me, but I don't recall ever
22 being challenged on it by a Procurator Fiscal or in any
23 other previous case that I'd handled or dealt with.

24 **Q.** We looked earlier at a couple of examples where somebody
25 had raised an issue about the functioning of Horizon?

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1 at the time.

2 **Q.** I should have said this is the 7th Edition, dated 2006,
3 so I think it's the one that's applicable to Mr Quarm's
4 investigation, from earlier iterations?

5 **A.** I probably had the previous version as well, when I was
6 a Royal Mail Investigator, because these were issued to
7 us. I'm not sure if somebody just copied them or
8 whether we were -- they were handed out at one of our
9 team meetings or something. But I am familiar with that
10 document.

11 **Q.** So this was essentially a guide to a range of Specialist
12 Reporting Agencies, non-police investigators and
13 prosecutors?

14 **A.** Yes.

15 **Q.** It's a list of, essentially, the things that the PF
16 Office require?

17 **A.** It was what -- it was their -- it was a guideline for us
18 to follow, yes.

19 **Q.** Can we look, please, at page 30. Under "Detrimental
20 Evidence":

21 "... it is important material which may be
22 detrimental to the prospect of a conviction is not
23 omitted from the statement. In order to perform his or
24 her function properly the [PF] must be aware of all the
25 evidence which has been gathered regardless of whether
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1 **A.** Yes.

2 **Q.** How would you go about discharging the duty to find and
3 then disclose to the Procurator Fiscal information about
4 the functioning of Horizon, generally: not whether there
5 was a glitch in the branch but whether Horizon as
6 a system was functioning properly?

7 **A.** I mean, if you're referring to the document, I -- where
8 I quoted glitches in the system, then, to me, that was
9 not a criminal activity. It was something I referred
10 back to the Retail Line for them to deal with. I was
11 not aware of what the context of what the glitches of
12 the system was. I couldn't make investigations into it
13 because we didn't know of the name of the originator of
14 that statement or whether the statement was, in actual
15 fact, true.

16 **Q.** Is the broader to answer my question, then, you didn't
17 see it as part of the role of you as an Investigator to
18 provide evidence to the Procurator Fiscal about problems
19 in Horizon because in no criminal investigation were you
20 aware of any problems in Horizon?

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

22 **Q.** Up until 2009, when you left, had you heard nothing
23 about allegations concerning the improper functioning or
24 the errors arising in the functioning of Horizon
25 concerning, in particular, balancing?

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1 **A.** I'm fairly certain, in my recollection, that no one, no
2 one, had brought to my attention that there were
3 problems with the Horizon system, and you mentioned
4 balancing and nobody had said to me that there was
5 a problem with the Horizon system balancing on a Post
6 Office, Crown Office or any other office.

7 **Q.** So two questions arising from that: by contrast, had
8 anyone said anything to you positively about the
9 robustness of Horizon?

10 **A.** Yes.

11 **Q.** Who and in what context?

12 **A.** It would come -- the conversation would be team
13 meetings, when we were talking about getting statements
14 from Horizon and the need -- why we would need the
15 statements and what they contained. And the consensus
16 would be that Horizon was working normally and, in
17 normal circumstances, if you required to get a statement
18 from Fujitsu, it always came up with the same type of
19 narrative: that the system was working and functioning
20 normally. So there was no need for us to question that,
21 as far as we were concerned, because we were getting
22 an expert witness from Fujitsu.

23 **Q.** Did you ever investigate a case in which an expert
24 witness from Fujitsu provided a witness statement?

25 **A.** I think in my time at Post Office Limited, there were

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1 **Q.** Why was that issue being talked about in team meetings,
2 the reliability and integrity of the Horizon system?

3 **A.** I think, basically, it was the process that you had to
4 go through to get it because it was not always delivered
5 timeously. If you asked for it, you could maybe wait
6 a number of weeks for it and it would then put you under
7 pressure to fulfil a report or submit a report to
8 a Procurator Fiscal, if --

9 **Q.** That's a timing issue.

10 **A.** Yeah.

11 **Q.** But what about the issue of there being a consensus that
12 Horizon was working normally?

13 **A.** Well, the consensus was that there was -- to the best of
14 my knowledge, and nobody ever challenged it, nobody --
15 it wasn't open for discussion because, as far as we
16 were -- it was a non-event, as far as we were concerned.

17 **Q.** Thank you. Can we move on to the investigation of
18 allegations of embezzlement against William Quarm. Do
19 you now recall investigating William Quarm?

20 **A.** Given this was 16 years ago, my recollection was very
21 vague but, having had a chance to look at the transcript
22 of the tapes, which was a major role that I played in
23 that investigation.

24 **Q.** Just to get some context before we look at that
25 interview, which we're going to look at in a moment,

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1 probably two occasions, but not ...

2 **Q.** When you're referring there to an expert witness, are
3 you referring to somebody who has particular knowledge
4 and expertise in the system, or are you referring to
5 somebody who is formally treated for court purposes as
6 an expert witness?

7 **A.** If I was to explain to you the process of achieving
8 an expert witness statement, it would go down to our
9 Casework Review Team down in Croydon. They would then
10 apply to Fujitsu for a witness statement to be gained
11 from them. We would not -- I don't recall ever asking
12 them directly. I would always go through the process of
13 our Casework Review Team to follow on, to get
14 satisfaction that there was no problem with the
15 computers.

16 **Q.** What about the thing I was asking you about, namely the
17 nature of the witness with which you are concerned. Was
18 there an expert report produced or was it in the form of
19 a witness statement?

20 **A.** My recollection was it was a witness statement.

21 **Q.** You said that there would have been a consensus amongst
22 team members. The team you're referring to there, is
23 that Post Office Investigation Department?

24 **A.** It would be at that time because there would be no need
25 to get a Fujitsu statement for Royal Mail.

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1 just to jog your memory a little bit about the
2 individual with which we're concerned, I think he,
3 that's William, he went by the name of Bill; is that
4 right?

5 **A.** Bill, yes.

6 **Q.** He was a man of good character, he'd never been in
7 trouble before in his life; is that right? Was that
8 part of your investigation, to look at his background
9 and antecedents?

10 **A.** I wasn't aware of anything. Nobody had brought --

11 **Q.** I think when we look at your report it will say he
12 hadn't been in trouble before.

13 **A.** If that's in my report, it must be --

14 **Q.** He was 66 years old, I think it says in your interview
15 transcript, at the time of the investigation and 68 by
16 the time that the prosecution occurred?

17 **A.** Yes.

18 **Q.** He was in poor health, I think. I think he told you
19 about that. He'd had some strokes, hadn't he?

20 **A.** Am I allowed to say because I see some of it is redacted
21 out.

22 **Q.** The things I'm referring to are recorded on the
23 documents that aren't redacted.

24 **A.** Right, okay, he had been experiencing minor strokes from
25 the previous year.

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1 Q. He'd worked at the Post Office in Bayhead, North -- and
2 I'm not going to be able to pronounce it correctly; you go
3 for it, Mr Grant?

4 A. Paible?

5 Q. Yes. Well, in fact, I was thinking of the island on
6 which the Post Office was situated?

7 A. Oh, Lochmaddy.

8 Q. That is an island in the Outer Hebrides; is that right?

9 A. Yes, it's -- well, Lochmaddy is a town on North Uist.

10 Q. So North Uist is an island --

11 A. Yes.

12 Q. -- located on the northwest coast of Scotland?

13 A. The Hebrides, yeah.

14 Q. I think Mr Quarm was a married man; is that right?

15 A. Yes.

16 Q. He had five children, I think he told you --

17 A. If he said five then, yes.

18 Q. -- and he was a grandfather?

19 A. Right.

20 Q. Now, I think you know that, as a result of the
21 investigation and the prosecution of him, he lost
22 everything. He had to move out of his house, did you
23 know that?

24 A. I need to be careful when I answer this one because he
25 didn't lose everything because of the Post Office

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1 a 44-minute interview between 10.50 and 11.34 in the
2 morning. There are three Investigators present: you,
3 Robert Daily, and Jonathan Bisset, yes?

4 A. Well, Jonathan Bisset was not an Investigator, he was
5 a finance analyst who was being accompanied -- he was
6 work shadowing myself and Mr Daily and so his role was
7 not as an Investigator.

8 Q. Okay, so there were three of you and one of Mr Quarm?

9 A. And his brother-in-law --

10 Q. Now, I think page 2, if we skip over the page, please,
11 introductions are made. Then about eight lines in,
12 Mr MacDonald -- that's the brother-in-law, yes --

13 A. Yes.

14 Q. -- introduces himself and you say:

15 "During this interview you can have a friend present
16 if you wish any friend whom you nominate must be over
17 the age of 18 and not involved in the enquiry. They
18 should be a Post Office employee. I understand because
19 of the nature of where we are on a Hebridean island that
20 may not be easy to get our hands on and I'm quite happy
21 to have your friend William MacDonald happy to be here
22 as a friend yeah?"

23 Mr Quarm says: "Right."

24 So the friend that was present --

25 A. Sorry, Mr Beer, if you can just go back there, just

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1 inquiry. There were other issues on his private
2 business which were much more serious, as far as -- from
3 finances were concerned. Mr Quarm had extensive debts
4 and, if you're going to cover the financial -- the
5 finance, he eventually -- 12 days after my interview, he
6 went bankrupt and that was not because of something that
7 happened that the Post Office did.

8 Q. I think you know that he passed away two years after he
9 was convicted --

10 A. I didn't know that, no, not until you've just said it
11 there just now.

12 Q. -- obviously, therefore, a decade before his conviction
13 for embezzling money from the Post Office was overturned
14 by the High Court in Scotland.

15 A. Mm.

16 Q. So you tell us in your witness statement that you were
17 one of the people who participated in an interview of
18 Mr Quarm on 7 August 2008, right?

19 A. That's correct.

20 Q. I think you took the lead in questioning Mr Quarm?

21 A. Yes.

22 Q. That was because you were the Lead Investigator?

23 A. Yes.

24 Q. Can we look at the interview, please. POL00166599.

25 This is a transcript of the interview. We can see it's

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1 a second, I noticed a typo there.

2 Q. If we go back up.

3 A. I've just noticed it just now. It says, "They should be
4 a Post Office Limited employee". That should read "They
5 should not be a Post Office Limited employee".

6 Q. Right. Why was that? Why shouldn't they be a Post
7 Office employee?

8 A. Because that would infer a bias or it would be unfair
9 because that then you would have four people from the
10 Post Office and --

11 Q. What about a union rep?

12 A. There was no requirement under the subpostmaster's
13 contract for that to happen. If there was --

14 Q. They were allowed it though, weren't they?

15 A. If that was who Mr Quarm required to be there, he could
16 have had a lawyer there as well, if he'd chosen that,
17 but he'd chose to have his friend William MacDonald.

18 Q. What role did Mr MacDonald play in the interview?

19 A. He was there to corroborate and make sure that Mr Quarm
20 was treated fairly. I think at one point he --

21 Q. How did he know that?

22 A. How did he know that? Because he signs a form, I think
23 it's a CSO -- I can't remember the number of the form.

24 It's a Corporate Security form which explains what his

25 role is.

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1 Q. In fact, he sat there in silence?
 2 A. There was one occasion when he got up to get a glass of
 3 water.
 4 Q. Silently?
 5 A. Silently. Yeah.
 6 Q. Now, in relation to the form that you went through at
 7 the beginning of the interview, was that a standard
 8 form, as you've just said, setting out the
 9 interviewee's, Mr Quarm's, legal rights?
 10 A. Yes.
 11 Q. Was that a form you went through at the beginning of
 12 every interview?
 13 A. Yes.
 14 Q. Did it include the caution telling the interviewee that
 15 they didn't have to say anything but anything they did
 16 say could be used in evidence?
 17 A. Yeah, I'm not -- I can't remember if it said it on that
 18 form but, most certainly, in the transcript of interview
 19 that caution was made.
 20 Q. Did it say anything about the right to have a legal
 21 representative present in interview?
 22 A. No, there was no requirement for that under Scots Law.
 23 That changed in 2010, I believe.
 24 Q. So, at this time in 2008, before the decision in *Calder*,
 25 there wasn't a requirement to offer a suspect a legal

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1 take this shortly -- that Mr Quarm also suggested that
 2 he had insufficient training on Horizon and was not
 3 overly confident in using it?
 4 A. I'm not sure he uses -- did he use the word
 5 "insufficient"? I think he says when he got his
 6 training it was four days in Dunfermline, that he got
 7 back to his office but the installation of the Horizon
 8 equipment happened some time later. So I don't know --
 9 I don't recall seeing the word "insufficient".
 10 Q. I'm trying to summarise number of passages?
 11 A. It's just that inferred to me that he didn't get enough
 12 training, so --
 13 Q. I'll read the passage. You asked him:
 14 "On a scale of 1 to 10 how would you rate your
 15 knowledge of the Horizon system?"
 16 He said:
 17 "Well, the whole Horizon system probably quite a low
 18 figure because we only have certain --"
 19 Then you interrupted:
 20 "Products."
 21 A. Yes.
 22 Q. Was that addressing then a different point in your
 23 understanding then?
 24 A. Yes.
 25 Q. What was the different point being addressed?

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1 representation?
 2 A. Correct. I think that was actually challenged, as well,
 3 Mr Beer. There was a minute on --
 4 Q. Yes, you know the papers very well, indeed.
 5 A. Right, okay.
 6 Q. There was a minute where Mr Quarm's solicitors applied
 7 to the court to exclude the interview on the grounds of
 8 procedural irregularity and oppression, essentially, and
 9 that application was refused by the court.
 10 A. Correct.
 11 Q. The offer of the friend, was that required under
 12 Scottish law or was that a bolt-on provided by the Post
 13 Office over and above the interviewee's legal rights
 14 under Scottish law?
 15 A. I think it was part of the Post Office Investigation
 16 security requirement, that any person who was being
 17 interviewed in this format would be offered the right to
 18 have a friend present.
 19 Q. Now, you've read this interview more than once, I think?
 20 A. Yes.
 21 Q. You tell us in your witness statement that Mr Quarm made
 22 full and frank confessions, yes?
 23 A. Yes.
 24 Q. Can I look at some other aspects of the interview. Can
 25 I suggest firstly, would you agree -- and I'm trying to

66

1 A. The different point was that, when he did his training,
 2 it covered far more than he was requiring for an office
 3 of his type. For instance, it would cover things like
 4 passports, driving licences. His office, I believe,
 5 didn't have the authority to issue these sort of
 6 documents.
 7 Q. Did he also say that he had sought help from the
 8 Helpdesk?
 9 A. Yes, he did.
 10 Q. Did he also say that he had identified and sought help
 11 with an ATM error that had resulted in a loss?
 12 A. I think the actual -- he was phoned up about why he was
 13 carrying that loss. I don't think that he phoned.
 14 I think he was contacted to ask why he was carrying that
 15 loss and he was asked to make it good.
 16 Q. He was saying that it was a loss that appeared to be
 17 a system fault and it ended without apparent resolution?
 18 A. I'm sorry to interrupt you there, it wasn't deliberate.
 19 Q. That's all right.
 20 A. When ATMs were first introduced, some offices didn't
 21 have them attached to Horizon. So I'm not sure when the
 22 ATM was actually attached to the Horizon system. So
 23 that could have been a standalone machine. I'm not
 24 entirely sure because, as I've said before, any
 25 investigation that I would have undertaken would have

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1 covered that point.
 2 **Q.** He agreed, lastly, is this right, that his Branch
 3 Trading Statements showed regular shortages?
 4 **A.** Yes.
 5 **Q.** Can we look at some specific passages in the interview,
 6 then. Again, if we have it on the screen, POL00166599,
 7 and page 14, please. The bottom half of the page,
 8 please. Thank you. I don't think that's page 14.
 9 Bottom half of the page, please.
 10 Picking it up about a third of the way down, what's
 11 being shown at the moment, you asked:
 12 "Were you then struggling to pay the invoices?"
 13 Just to put that in context, there'd been
 14 a discussion before now, is this right, of the need for
 15 him, as he said, to pay invoices for the -- I'm going to
 16 call it the grocery side of the post office; is that
 17 right?
 18 **A.** That's correct.
 19 **Q.** He says, "Yeah."
 20 **"Question:** So how did you then pay those invoices?
 21 **"Answer:** Quite often late [something] the pressure
 22 on.
 23 **"Question:** Right and where did you get the money
 24 from to pay those invoices?
 25 **"Answer:** Well there was money coming in on a daily
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1 What money are we talking about are we talking about
 2 money from the Post Office if it was money from the Post
 3 Office where did we move it to do you know?
 4 **"Answer:** Well it must have been to my account, shop
 5 account.
 6 **"Question:** ... are we talking about the same
 7 Alliance & Leicester account business account?"
 8 He said he's got two Alliance & Leicester accounts
 9 and, if we scroll down, and a Royal Bank, I think it's
 10 the Royal Bank of Scotland account. You ask:
 11 "So how would we go about moving it into the second
 12 account that we're talking about now how would you
 13 physically do that? Is it also an Alliance & Leicester
 14 account?
 15 **"Answer:** The Royal Bank [of Scotland].
 16 **"Question:** The Royal Bank but we don't have online
 17 banking here for Royal Bank ..."
 18 Then at the foot of the page, about ten lines up:
 19 "... how would it go from the Post Office to the
 20 Royal Bank? Would you physically take a lump of cash
 21 and deposit it in the Royal Bank?
 22 **"Answer:** I must have done.
 23 **"Question:** And if you did that how often would you
 24 do that and how much at a time?
 25 **"Answer:** I couldn't be specific with that."
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1 basis.
 2 **"Question:** Okay and Post Office money was there
 3 ever used to pay invoices?
 4 **"Answer:** Well it must have been or we wouldn't have
 5 this situation."
 6 I think your colleague asks:
 7 "Do you ever remember taking money out of the Post
 8 Office to pay an invoice?"
 9 **"Answer:** Not consciously no.
 10 "RD: Not consciously?
 11 **"Answer:** No."
 12 Did you take that to be an admission of theft?
 13 **A.** There were various aspects of the admissions of theft.
 14 **Q.** I'm asking about this one.
 15 **A.** This particular one, no.
 16 **Q.** Is that because it rather lacks clarity and he says that
 17 he doesn't actually remember taking money out of the
 18 Post Office to pay an invoice?
 19 **A.** At that point, that's exactly what he said.
 20 **Q.** Then if we go forward to page 17, please. Third line
 21 in, fourth line in:
 22 "Well, I think [this is him] it was just moving
 23 money, money around.
 24 **"Question:** I understand what you mean by moving
 25 money around but we need to be more specific than that.
 70

1 Then you ask him some details about the bank
 2 account.
 3 So he may have been saying here that he was using
 4 Post Office money, and paying it in, transferring it or
 5 depositing cash into either an Alliance & Leicester or
 6 a Royal Bank of Scotland account, correct?
 7 **A.** That's my understanding, yes.
 8 **Q.** So what investigations did you take to evidence the
 9 deposit of money that belonged from the Post Office into
 10 the Alliance & Leicester and Royal Bank of Scotland
 11 accounts?
 12 **A.** This is where I did not get the opportunity to follow
 13 through with that inquiry.
 14 **Q.** When did exactly did you leave?
 15 **A.** It was -- if I -- I was removed from my post as
 16 Investigation Manager about a month or six weeks after
 17 this interview. I spent -- so this was in August.
 18 I was then told to attend the Crown Office in Perth and
 19 assist the Branch Manager there and that was prior to
 20 Christmas 2008. So I'd actually not left the Post
 21 Office Limited, I was still employed, but what you might
 22 call gardening leave. I was now no longer part of the
 23 Security or Investigation Team.
 24 **Q.** Okay, so, essentially, trying to summarise things,
 25 Mr Grant, you're saying that, relatively shortly after
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1 this, although you remained a Post Office Limited
 2 employee, your job function changed and you didn't hold
 3 the responsibility for pursuing a line of inquiry?
 4 **A.** That's correct.
 5 **Q.** But it's a pretty obvious line of inquiry, isn't it;
 6 I think you'd agree?
 7 **A.** I mean, had I been given the opportunity, I'd have
 8 applied to Alliance & Leicester for the dockets.
 9 **Q.** In fact, just stopping you there, no need to do that
 10 because we know that Mr Quarm was asked to supply all of
 11 his bank accounts and he did.
 12 **A.** Yeah, but I was looking for the actual deposit slips
 13 from these agencies --
 14 **Q.** I see.
 15 **A.** -- so that we could see what -- because what we have
 16 here is Mr Quarm, who is having his life disappear
 17 underneath his feet, because he's been an honest man
 18 right up until a certain point, he's made erroneous
 19 decisions, in my opinion, to use Post Office funds to
 20 support his failing business. He's used that by various
 21 means and I think, if you go onto the third tape, there
 22 were -- there's inference that money was being taken
 23 from the post office and put into Royal Bank because he
 24 was offsetting some loan or debt that he had with them.
 25 There was also fictitious -- in my opinion,

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1 **"Answer:** Yeah."
 2 **"Question:** Did you in fact put that money in to
 3 make the shortage good?
 4 **"Answer:** No there's a bank loan to do that."
 5 What did you understand him to be saying there?
 6 **A.** Um, it's -- it's difficult.
 7 **Q.** Is overall, looking at --
 8 **A.** Sorry, it's difficult because Mr Quarm is now no longer
 9 with us. I do think that Mr Quarm believed that there
 10 was money coming from the Royal Bank of Scotland and it
 11 was his intention to -- once that money came from the
 12 Royal Bank of Scotland, to repay the money. But further
 13 down in the interview, he does get the bank loan and he
 14 does not pay the Post Office back.
 15 So, in effect, his understanding, it's obfuscation,
 16 it's deflection away from actually admitting -- I do
 17 believe that Mr Quarm was going through a period of
 18 grief, the first thing in grief is denial. So you've
 19 got denial. So I think that's there he was. The
 20 grief -- some people call it the grieving process.
 21 Grief can happen in any force of life and I believe that
 22 Mr Quarm was grieving because he could see his life
 23 business disappearing. He knew the status of his shop,
 24 which, if we come to that later, then there are things
 25 there that can be taken in, that Mr Quarm was not

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1 fictitious deposits for which there was no money being
 2 made through the Horizon system into Mr Quarm's own
 3 Alliance & Leicester account. No money existed but the
 4 credit was made to his Alliance & Leicester account and
 5 then that would allow him to write cheques on the
 6 strength of that Alliance & Leicester account to pay the
 7 bills for the shop.
 8 **Q.** So you'd want to follow the money, wouldn't you?
 9 **A.** Yeah, well, that's where I was going.
 10 **Q.** Well, that's the most obvious thing in the world to do?
 11 **A.** That's where I was going but I wasn't given the
 12 opportunity.
 13 **Q.** So you'd expect the person who did have the opportunity,
 14 Mr Daily, to have done that, agreed?
 15 **A.** It would have been great but Mr Daily was under a lot of
 16 pressure. I know that because I'd several pending cases
 17 that were awaiting prosecution or being presented to the
 18 Procurators Fiscal, so Mr Daily inherited all of those
 19 at very short notice.
 20 **Q.** If we can just go, lastly, to page 33.
 21 **A.** Okay.
 22 **Q.** Four lines in:
 23 "You're declaring what was actually on hand but then
 24 what you're saying to the Horizon system [is] you're
 25 making that good is that correct?"

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1 prepared to admit, that "yes, I have taken the money",
 2 but his explanation is that "I've got money coming and
 3 I'm going to put it back". That's what I read into
 4 that.
 5 **Q.** Did you obtain a clear account from him as to which
 6 money he had paid, from which post office account, into
 7 either Alliance & Leicester accounts or the Royal Bank
 8 of Scotland account?
 9 **A.** Well, again, we asked Mr Quarm to provide the statements
 10 which he very kindly did. So my follow-up after that
 11 would be to determine what deposits had actually gone
 12 through the Horizon system to allow this transaction to
 13 credit his Alliance & Leicester account. Now, if you
 14 have no money and then you write out a deposit slip and
 15 you put it through the Horizon system into a specific
 16 Alliance & Leicester account -- and Mr Quarm says he had
 17 two, he would put out -- there would be a docket --
 18 there would be a deposit slip for that.
 19 **Q.** So step 1 then, you'd want to find a deposit slip --
 20 **A.** Yes.
 21 **Q.** -- going out of the post office account?
 22 **A.** Yes.
 23 **Q.** Okay, then step 2?
 24 **A.** Step 2 is to -- well, recover that, check it against --
 25 there would then be an opportunity to go and get ARQ

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1 data, compare it to who was logged on to the system when
2 that transaction went through. That should identify who
3 the originator was. If the originator is one and the
4 same person, then you would make an assumption, rightly
5 or wrongly, that that person has put a fictitious
6 transaction thorough to credit his own bank account so
7 he can then make withdrawals using a chequebook to pay
8 bills.

9 So the money never existed.

10 **Q.** What about step 3, which is check the Alliance &
11 Leicester and Royal Bank of Scotland statements to show
12 the money coming in?

13 **A.** Yeah. Yes.

14 **Q.** To your knowledge, were either step 1, 2 or 3 ever
15 undertaken?

16 **A.** No. Because I've seen the production list, I do not
17 recognise any of those --

18 **Q.** When you left the case, did you have an investigation
19 plan in place?

20 **A.** I think there was a casework event log.

21 **Q.** Yes, I mean, we can look at that. All it says is he
22 made full and frank admissions, and then that's the --

23 **A.** Does that not say there was still existing inquiries?

24 **Q.** It may do, I can try and find it. But, even if it did,
25 it didn't set out step 1, step 2 and step 3?

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1 understand, Mr Beer?

2 **Q.** Yes.

3 **A.** Yeah.

4 **Q.** Can we look, please, at POL00166596.

5 This is an investigation report, we can see that
6 from the top there, "Post Office Limited Confidential:
7 Investigation, Legal", yes?

8 If we go to page 5, please. We can see that it was
9 prepared by you on -- at least dated on 2 September
10 2008, yes?

11 **A.** Yes.

12 **Q.** So the following month after the interview. If we just
13 go back to page 1 to see what you wrote in the
14 investigation report and, just to be clear, this isn't
15 the report to the Procurator Fiscal --

16 **A.** No.

17 **Q.** -- this is an internal report to Post Office.

18 **A.** Yes.

19 **Q.** We can see who it concerns, namely Mr Quarm. We can see
20 his length of service. If we scroll down, please. We
21 can see when he was suspended, 23 July, and who gave
22 that authority. We can see who the Designated
23 Prosecution Authority is, Dave Pardoe, a person with
24 whom we're very familiar. Then we can see what you
25 wrote under "Corporate Security Criminal Law Team".

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1 **A.** No, it doesn't, because I wasn't given the opportunity.

2 **Q.** Was there any investigation, to your knowledge, into the
3 concerns raised by Mr Quarm about the ATM machine and
4 money shortages as a result?

5 **A.** To my knowledge, no, there wasn't.

6 **Q.** Was that, again, because you were, as you put it, denied
7 the opportunity?

8 **A.** Yes.

9 **Q.** So looking at the papers now, is it right that there was
10 no investigation into any facts or matters raised by
11 Mr Quarm in the interview before the report was
12 submitted to Post Office in Croydon for the purposes of
13 a decision on prosecution?

14 **A.** I wouldn't say there wasn't any investigation. I think
15 an examination of the branch accounts and I believe
16 there was some important documents, I'm not sure --
17 I honestly can't recall but there would be -- you do
18 a trial balance, the trial balance will tell you what
19 you should have. You can then go back and redo the
20 balance by altering the figures on hand.

21 If I could just explain, if the Horizon -- I'm just
22 going to use rough figures -- if the Horizon system says
23 that you were £1,000 short, you could then go back in
24 and adjust your cash element by £1,000 to make that
25 balance but not have the £1,000 there. Do you

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1 You explain in that paragraph at the bottom what led
2 to the investigation -- and then over the page,
3 please -- you explain what happened in the audit.
4 Scroll down, please. You say subsequently the case was
5 allocated to you; you then speak about the interview,
6 yes?

7 **A.** Yes.

8 **Q.** You say he was cautioned. Next paragraph: he asked for
9 a friend, the GS003 was completed, and you append that
10 as Appendix C. You then summarise some of the interview
11 and produce as Appendix B a copy of a letter that
12 Mr Quarm wrote.

13 Then scroll down, please. You carry on summarising
14 the interview.

15 Over the page, please. You say:

16 "He needed to pay for stock for his grocery business
17 from his main supplier who by this time was insisting on
18 a weekly payment of around £4,200. During the course of
19 this discussion Mr Quarm appeared to be in a bit of
20 a daze and was not understanding the questions put to
21 him. He was asked if he was okay, he replied that
22 because of the interview he had not taken his daily
23 medication."

24 You allowed him to do this, and confirmed that he
25 was in a fit state to continue. He said he was fine and

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1 wished to continue.

2 Then you carry on summarising the interview.

3 Then down to the bottom of the page, please, second
4 paragraph up:

5 "Due to the health condition of Mr Quarm and the
6 inability to contact anyone in authority because of the
7 remote location of [the branch] it was decided by [you]
8 that it would not be appropriate to conduct searches of
9 [his] home address. [He] gave assurances that he would
10 forward copies of all his bank, mortgage and credit card
11 accounts within one week ..."

12 We know that he did that. You say:

13 "[He] has admitted that since at least January 2008
14 he has taken advantage of his position as subpostmaster
15 ..."

16 Over the page:

17 "In view of the admissions made by Mr Quarm and
18 sufficiency of evidence available to support
19 a successful prosecution, it's recommended that a report
20 should be prepared and submitted to the Procurator
21 Fiscal's department for consideration as to what future
22 actions should be taken."

23 So, essentially, you were asking for a decision on
24 prosecution on the basis of the admissions, as you saw
25 them?

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1 office, it was used to offset some of his other debts,
2 in relation to his personal business.

3 **Q.** So had you, in fact, at this time, got any plans to
4 undertake what we've described together as steps 1, 2
5 and 3?

6 **A.** It was in my head. It was in my head. It's not written
7 down anywhere but, had that come back before a report
8 would have been submitted to the Procurator Fiscal, the
9 other enquiries would have been followed through with
10 and we would have had a much more detailed report to go
11 to the Procurator Fiscal.

12 **Q.** Just look, then, at the case file log, POL00166757.

13 This is the case file log that you were referring to
14 earlier and --

15 **A.** Yes.

16 **Q.** -- I couldn't quite find the reference at my fingertips.

17 Is this, essentially, a record or supposed to be
18 a record of significant steps in the course of the
19 investigation?

20 **A.** Yes.

21 **Q.** If we scroll down, please. If we look at the
22 penultimate entry -- sorry, the antepenultimate --
23 7 August:

24 "Interview postmaster who admits false accounting
25 and embezzlement by depositing fictitious amounts into

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1 **A.** Yes, because the -- this report has to be in roughly
2 within two weeks --

3 **Q.** Of?

4 **A.** -- of the interview. There's a second report which goes
5 to the conduct manager as well, which omits some of the
6 finer detail there.

7 But, in effect, this is what I would call an interim
8 report requesting that, based on what is included in the
9 transaction -- sorry, the transcripts, I am suggesting
10 that there's sufficiency of evidence that this has been
11 done deliberately, wilfully and knowingly -- although it
12 doesn't say that -- but as a deliberate action to gain
13 advantage, which is why it became an embezzlement
14 charge, because embezzlement requires you to be in
15 a position of trust, which Mr Quarm was, he was trusted
16 with the Post Office funds and he is contracted to
17 secure them.

18 He didn't have permission to take them and, in his
19 own letter to branch -- or the Contracts Manager, he
20 says he has used the Post Office funds. He then, in
21 that letter, I think, also states that he's going to get
22 a bank loan. It took seven months for the bank loan to
23 appear, which was insufficient for the -- to cover the
24 amount that was actually missing and, when he did get
25 the bank loan, the bank loan was not applied to the post

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1 personal bank for use in private retail shop.

2 "[14 August] Suspect offender report completed and
3 sent."

4 Is that the document we've just looked at?

5 **A.** Yes, or perhaps not. Perhaps not. I don't know --

6 **Q.** Because the one we looked at, if you remember, was dated
7 the 2nd?

8 **A.** Yes, yes. I don't recall what that one there, Suspect
9 Offender Report --

10 **Q.** No. Then 2 September:

11 "Legal and personnel reports completed and
12 dispatched for authority to prosecute. Tapes copied and
13 inserted into Appendix B."

14 So there isn't any reference there about --

15 **A.** No.

16 **Q.** -- taking any of the other investigative steps, is
17 there?

18 **A.** I don't think -- correct me if I'm wrong -- when we
19 actually received the bank statements from Mr Quarm,
20 I can't remember the date. So it might pre-date this or
21 post-date.

22 **Q.** Okay. But, in any event, this wasn't added to --

23 **A.** No.

24 **Q.** -- to say "We've now got the bank statements, we can
25 look at those, we're now going to take step 1" --

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1 A. No.

2 Q. -- "and look at counterfoils" --

3 A. No.

4 Q. -- "for money going out. We're not going to look at ARQ

5 data", or "We are going to look at ARQ data"?

6 A. By its omission, it's not -- well, it's not there.

7 Q. Can we look, please, at POL00166598. We can see,

8 I think, this is a document dated 16 September 2008. If

9 we just scroll down, we can see who it's from: terry

10 Crowther in the Fraud Team. That was a person down in

11 Croydon, yes?

12 A. Yes.

13 Q. "Authority to proceed to prosecution has been obtained

14 by the Senior Security Manager, Fraud Strand; a copy of

15 the authority is page 7.

16 "Please prepare and submit a report to the

17 appropriate prosecuting authority for consideration, and

18 advise this office of the [PF's] reference number",

19 et cetera.

20 So were you still in post performing your function

21 at this time?

22 A. I think I probably was, yes.

23 Q. That refers to "Authority to proceed to prosecution".

24 A. Yes.

25 Q. Other than your report, do you know what the Senior

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1 "This is a Scottish case which in the normal course

2 of events is not submitted to Royal Mail Group Legal

3 Services for advice regarding the sufficiency of the

4 evidence for prosecution ..."

5 Just stop there. Is that right, that Scottish cases

6 did not go through Legal Services to advise on

7 sufficiency of evidence?

8 A. It's my understanding that there was no lawyer employed

9 at Criminal Law in Post Office Limited or Royal Mail

10 Group, I can't remember -- but there was no one

11 qualified to make the decision because they're not

12 trained in Scots Law.

13 Q. I was about to ask what the reason for that was, that

14 they didn't pass through that -- I was going to say

15 safety filter, but process?

16 A. Yes. Sorry, the -- yes, that's --

17 Q. They weren't trained in Scots Law?

18 A. They weren't trained in Scots Law, so they took

19 a hands-off approach, as it were.

20 Q. So it just went to Mr Pardoe?

21 A. Yes.

22 Q. Was he trained in Scots Law?

23 A. I don't know if he was trained in Scots Law but he was

24 a Team Leader in Scotland for a period of time.

25 Q. If we scroll up to see what he says, 6.00 in the morning

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1 Security Manager, Fraud Strand received in order to

2 decide whether to prosecute?

3 A. No, I would imagine that he's seen sight of the case

4 file, because -- or one of the offender reports, or

5 a combination of all. I really don't know what --

6 Q. What did you send down to Croydon for him to decide

7 whether to prosecute?

8 A. I would have sent down a Green Jacket with everything in

9 it.

10 Q. So the Green Jacket is referring to the outer skin of

11 the folder?

12 A. Yes, yes.

13 Q. What is inside the skin of the folder?

14 A. Oh, numerous documents, plus three appendices,

15 Appendix A, B and C. Each one has got different --

16 there's a schedule of contents that should be in each

17 one.

18 Q. If we look, please, to what the Senior Security Manager

19 Fraud Strand did by looking at POL00166597. Look at the

20 foot of the page, please. This is an email from

21 Mr Crowther, who we've just seen on the documents, dated

22 15 September 2008, to Mr David Pardoe:

23 "Dear Dave

24 "Please find attached files for the above case for

25 your authority to prosecute in this case.

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1 on the 16th:

2 "Please continue with PF intervention."

3 Was that kind of response normal, that there wasn't

4 any analysis of the evidential strengths and weaknesses;

5 it was just one liner?

6 A. You see, I don't know if he did -- from that, it's

7 short, it's sharp, it's direct. But what he actually

8 did, whether he reviewed it or whether he didn't review

9 it I have no knowledge.

10 Q. So you don't know what the process was after you sent

11 the Green Jacket to Croydon?

12 A. Well, eventually the Green Jacket comes back and I'm not

13 sure when I got it back or if I got it back because

14 we're now -- I think I was still in post at that point.

15 So I probably did get it back.

16 Q. Did they always come back to prosecute or did you get

17 ones that came back when Mr Pardoe said, "No, I'm

18 dissatisfied with the evidential sufficiency in this

19 case"?

20 A. You know, I can't recall getting a rejected --

21 Q. So every case went to prosecution?

22 A. Yeah, because the decision to prosecute is preparing the

23 case and submitting it to the Procurators Fiscal. Then

24 the Procurators Fiscal has the decision whether he's

25 going to run with it, whether he wants more enquiries or

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1 whether he wants more evidence, or whether he thinks
2 there's a sufficiency of evidence.

3 So, although Mr Pardoe is making a decision, it's
4 a decision made on behalf of Post Office Limited that,
5 yeah, we're going to -- we think there's enough, we're
6 going to put it to the Procurator Fiscal and let them
7 test it in court, or test it at the level at the
8 Procurators Fiscal.

9 Now, I have, in the past, when I've submitted
10 something to the Procurator Fiscal and he calls me in
11 and we discuss it, and he says, "Well I need extra,
12 I need more", and whatever it is, it would have been
13 similar to someone in England going to our Criminal Law
14 Team, them instructing a barrister, and then the
15 barrister deciding "I need more".

16 **Q.** Can we look at the last stage in the process, albeit
17 it's not one in which you were involved, at COPF0000002.
18 Can you see this is a copy of a report to the Procurator
19 Fiscal dated 21 April 2009?

20 **A.** Yes.

21 **Q.** Or it was received by them on that date?

22 **A.** Yes.

23 **Q.** Is this the format -- maybe if we just go and look at
24 the second page, as well, and then over the page. Is
25 this the format of reports that would be submitted by

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1 team. No, there are not, sir. Thank you very much.

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

3 Well, Mr Grant, thank you for coming to the
4 Inquiry -- I take it from Scotland -- and thank you for
5 answering Mr Beer's questions.

6 So we'll adjourn now until tomorrow morning, yes?

7 **THE WITNESS:** Sorry, Sir Wyn, is it possible for me to make
8 a personal statement?

9 **SIR WYN WILLIAMS:** Yes, certainly.

10 **THE WITNESS:** The outcome of this Inquiry is a very, very
11 sorry state of affairs. No reflection on you, Sir Wyn.
12 The Post Office let the postmasters down, they let the
13 staff who they employed down, by being less than open
14 and honest with information that should have been
15 shared, wasn't shared, and the ultimate results have led
16 to significant upset, significant difficulties, for
17 people who were left behind.

18 I can say this because I've got no truck with the --
19 I've got no link with the Post Office any more, in that
20 they deceived me and they deceived an awful lot more
21 people. For my part in it, I am humbly sorry. I just
22 hope that people do learn from this and are more honest
23 in the future when you're affecting other people's
24 lives. Thank you.

25 **SIR WYN WILLIAMS:** Thank you, Mr Grant.

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1 Post Office Limited to the Procurator Fiscal that you
2 referred to earlier, that after 2006 it had to be done
3 via a web portal?

4 **A.** It looks -- it's difficult to tell because the actual
5 portal itself is all boxy. When you see it printed like
6 that it looks different, but --

7 **Q.** We understand this report to have been the one submitted
8 in April 2009 by Mr Daily. So this is the report that
9 you would have written if you had continued to be in
10 post. I'm not saying the content would have been
11 precisely the same --

12 **A.** It would have been in that format, yeah, but I would
13 have expected it to be much more detailed.

14 **Q.** You would have expected it to be much more detailed
15 because it doesn't say -- I'm not going to go into
16 detail because it's not your document, but it's
17 apparent, by April 2009, the bank statements from the
18 three accounts have been obtained but none of the steps
19 that we mentioned had been --

20 **A.** Yeah, steps 1, 2 and 3 that we discussed earlier.

21 **MR BEER:** Thank you very much. Those are the only questions
22 that I ask you, Mr Grant.

23 **THE WITNESS:** Thank you.

24 **MR BEER:** I'm not sure whether there are other questions
25 from Core Participants. I'm looking at the Hudgells

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1 As I've said, we'll adjourn now until tomorrow
2 morning at 10.00.

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

4 **SIR WYN WILLIAMS:** Thank you very much.

5 (12.43 pm)

6 (The hearing adjourned until 10.00 am the following day)

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I N D E X

RAYMOND GRANT (sworn)	1
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