

Thursday, 1 February 2024

1
 2 (9.59 am)
 3 **MR BEER:** Good morning, sir. Can you see and hear us?
 4 **SIR WYN WILLIAMS:** Yes, I can. Thank you.
 5 **MR BEER:** Thank you very much. May I call Graham Ward.
 6 **GRAHAM WARD (sworn)**
 7 **Questioned by MR BEER**
 8 **MR BEER:** Good morning, Mr Ward. My name is Jason Beer and,
 9 as you know, I ask questions on behalf of the Inquiry.
 10 Can you tell us your full name, please?
 11 **A.** Graham Ward.
 12 **Q.** Thank you very much.
 13 **SIR WYN WILLIAMS:** Before you continue, Mr Beer, I think
 14 it's appropriate to give Mr Ward a direction about
 15 self-incrimination, so I'll do that now.
 16 **MR BEER:** Yes, thank you, sir.
 17 **SIR WYN WILLIAMS:** Mr Ward, under our law, a witness at
 18 a public inquiry has a right to decline to answer
 19 a question put to him by Counsel to the Inquiry, by any
 20 recognised legal representative or by me if there is
 21 a risk that the answer to that question will incriminate
 22 the witness. In shorthand, this legal principle is
 23 known as the privilege against self-incrimination.
 24 I consider that fairness demands that I remind you
 25 of that principle before you give your evidence. If at

1

1 statement, excluding its appendices. Can we turn that
 2 up, please. It's WITN10590100. It should be at tab A1
 3 in the bundle in front of you as well. Now, I think
 4 there's an amendment you would like to make to it, to
 5 paragraph 4(b), which is on page 2.
 6 **A.** That's correct.
 7 **Q.** Sorry, 4(d) on page 2, right at the bottom.
 8 **A.** Yeah.
 9 **Q.** When it says, "In around [1995] I joined the Post Office
 10 Investigation Team", do you wish to amend that to 1995?
 11 **A.** Yeah, it actually says "around 1997" but it's actually
 12 1995, yeah.
 13 **Q.** Okay, so it should read "In ... 1995"?
 14 **A.** Yeah.
 15 **Q.** Thank you very much. If you turn to the last page,
 16 please, which is page 35, is that your signature?
 17 **A.** It is, yes.
 18 **Q.** With the amendment we've just made, are the contents of
 19 the witness statement true to the best of your knowledge
 20 and belief?
 21 **A.** They are.
 22 **Q.** Thank you very much. You can put that to one side,
 23 please, and that can come down.
 24 I think you joined the Post Office in 1984 as
 25 a counter clerk; is that right?

3

1 any stage you wish to rely upon the privilege, it is for
 2 you to make it clear to me that, in respect of any
 3 question put to you, it is your wish to rely upon the
 4 privilege against self-incrimination. If, therefore,
 5 any questions are put to you by any of the lawyers who
 6 ask you questions, or by me, which you do not wish to
 7 answer, you must tell me immediately after any such
 8 question is raised.
 9 At that point, I will consider your objection to
 10 answering the question and, thereafter, rule upon
 11 whether your objection should be upheld. I understand
 12 that you're represented by a solicitor here at the
 13 Inquiry today. No doubt, if the issue relating to
 14 self-incrimination arises, that solicitor will assist
 15 you and, if at any stage during the questioning, you
 16 wish to consult your solicitor about the privilege, you
 17 must tell me so that I can consider whether that is
 18 appropriate.
 19 Do you understand what I've just said to you,
 20 Mr Ward?
 21 **A.** Yes, I do.
 22 **SIR WYN WILLIAMS:** Thank you. Then over to you, Mr Beer.
 23 **MR BEER:** Thank you very much.
 24 Now, Mr Ward, you've helpfully made a witness
 25 statement to us in the Inquiry. It's a 35-page witness

2

1 **A.** That's correct.
 2 **Q.** You left in May 2016 as Mail Conformance Manager within
 3 the National Network Conformance Team; is that right?
 4 **A.** That's correct.
 5 **Q.** If I can go at a canter, first, through your various
 6 positions and then come back and explore each of them in
 7 a little more detail.
 8 **A.** Yeah.
 9 **Q.** So I think 1984 to 1992 you were a counter clerk at
 10 branches in south London; is that right?
 11 **A.** Yeah, that's correct.
 12 **Q.** In 1992 you became an Assistant Area Manager in the
 13 London South West District?
 14 **A.** That's correct.
 15 **Q.** In 1993 you became an Auditor in the South East Regional
 16 Audit Team; is that right?
 17 **A.** Yeah, that's correct.
 18 **Q.** In 1995, as you've just told us, you joined the Post
 19 Office Investigation Team, first as an Analyst and then
 20 as an Investigation Manager --
 21 **A.** That's correct.
 22 **Q.** -- albeit, as I think you're going to tell us, that was
 23 just a job retitling exercise --
 24 **A.** Yeah.
 25 **Q.** -- and the substance of the job remained the same?

4

1 A. Essentially, yeah.
 2 Q. Thank you. 2001, you became the Policy and Standards
 3 Manager within the Security Team; is that right?
 4 A. Yeah, that's correct.
 5 Q. In 2002 you became the Assistant Casework Manager in the
 6 Security Team?
 7 A. That's correct.
 8 Q. In 2007 you became the Casework Manager in the Security
 9 Team?
 10 A. That's correct.
 11 Q. In 2012 you moved to work on a project in Information
 12 Security?
 13 A. Yes, that's correct.
 14 Q. In 2013 you became the Mail Conformance Manager --
 15 A. Yeah, that's correct.
 16 Q. -- and you left in May 2016?
 17 A. Exactly, yeah.
 18 Q. So, overall, it's plain, would you agree, that you had
 19 a long career in the Post Office?
 20 A. Yes, I did, yeah.
 21 Q. That included working in the Investigation Team, the
 22 Security Team --
 23 A. Yeah.
 24 Q. -- for a long period of time --
 25 A. Indeed, yeah.

5

1 Q. Did you have any professional qualifications when you
 2 became an Auditor?
 3 A. No, I didn't, no.
 4 Q. Did you receive any in-house training in order to
 5 perform the role of Auditor?
 6 A. Yes, it was on-the-job training, yeah.
 7 Q. What training did you receive when you became
 8 an Auditor?
 9 A. So as an Auditor, it was a case of auditing accounts of
 10 whichever branches we were going into, which involved
 11 counting cash, stock and doing performance of all the
 12 various vouchers that were on hand. So, essentially,
 13 you were doing the same sort of job as you were as
 14 a counter clerk, so it was just more of the same,
 15 auditing the entire branch.
 16 Q. To some people's mind an Auditor may, or the title
 17 "Auditor" may convey a certain image. Would a fairer
 18 description of what you were, in fact, doing be stock
 19 taking?
 20 A. Well, we were counting all the cash, all the stock, all
 21 the vouchers that were on hand, and coordinating that
 22 into the office balance. So yeah, I guess you could say
 23 that, yes.
 24 Q. In 1995, as you have told us, you joined the Post Office
 25 Investigation Team; is that right?

7

1 Q. -- prior to the rollout of the Horizon system, and
 2 through the rollout of the Horizon system?
 3 A. Yes.
 4 Q. You held, would you agree, significant roles, so far as
 5 the Inquiry's investigation is concerned, as
 6 an Investigation Manager, Assistant Casework Manager,
 7 and Casework Manager?
 8 A. Yes.
 9 Q. I think we're going to hear that you were the Casework
 10 Manager in relation to the investigations of Noel Hughie
 11 Thomas, yes?
 12 A. Yes.
 13 Q. You were a Financial Investigator in the proceedings
 14 against Julian Wilson?
 15 A. Correct.
 16 Q. And you were involved in a capacity in the civil claim
 17 concerning Lee Castleton?
 18 A. Correct, yeah.
 19 Q. Can we go back and look at some of those jobs in
 20 a little more detail, starting with when you became
 21 an Auditor in 1993 in the South East Regional Audit
 22 Team. You tell us that involved auditing branch
 23 accounts and undertaking various compliance tests; is
 24 that right?
 25 A. That's correct, yeah.

6

1 A. That's correct, yeah.
 2 Q. The Investigation Team was part of the Security Team?
 3 A. Yes, that's correct, yeah.
 4 Q. You were initially an Investigation Analyst; is that
 5 right?
 6 A. That's right, yeah.
 7 Q. You were line managed by a manager; is that right?
 8 A. That was right, yeah.
 9 Q. You tell us that you attended two weeks of formal
 10 training provided by something you describe as the Royal
 11 Mail Training Team?
 12 A. Yeah.
 13 Q. Was that assessed training?
 14 A. There was an assessment at the end of the course, yeah.
 15 It was a two-week training course and you had to pass
 16 the assessment to sort of pass out, as it were.
 17 Q. Did that training involve any external trainers?
 18 A. No, they were in-house trainers.
 19 Q. So there were no, for example, police officers --
 20 A. No.
 21 Q. -- or other people involved in the law enforcement
 22 business there?
 23 A. No, no.
 24 Q. Did it involve any training delivered by external
 25 lawyers?

8

1 A. No.

2 Q. Did it involve any training delivered by lawyers at all?

3 A. I don't remember any lawyers during that two-week

4 session coming to the course, but there may have been

5 but I don't recall.

6 Q. In a subsequent part of your statement you recall there

7 being a training session about disclosure. Was that

8 within the two-week course or was that a separate

9 course?

10 A. I believe that was probably a separate -- I don't recall

11 it during that two weeks but it was a long time ago.

12 Q. Just jumping ahead a bit, you tell us there was a job

13 re-evaluation exercise; is that right?

14 A. Yeah.

15 Q. When was that?

16 A. I think it would probably have been about a year or so

17 into the role. So I joined in '95 as an Investigation

18 Analyst and the job, essentially, was to support the

19 Investigation Manager putting cases together. The

20 evaluation that sort of -- basically, you became

21 an Investigation Manager, so it was just leading

22 investigations at that point, instead of supporting.

23 Q. So after that time, you were the first officer --

24 A. Yeah.

25 Q. -- as it were --

9

1 Q. You tell us in your statement that as an Investigator,

2 both as an Analyst and then an Investigation Manager,

3 you were required to apply legislation including the

4 Police and Criminal Evidence Act --

5 A. Yeah.

6 Q. -- and the Criminal Procedure and Investigations Act?

7 A. Yeah.

8 Q. Were you trained on the requirements of each of those

9 pieces of legislation in the two weeks?

10 A. Yeah, it was covered in those two weeks, yeah.

11 Q. What about the Codes of Practice issued under each of

12 those pieces of legislation?

13 A. It was such a long time ago, I can't recall, to be

14 honest, but we had those Codes of Practice books in our

15 tackle kits. So you'd have a kit that you would carry

16 around with you, so the Codes of Practice were there.

17 Q. In hard copy, you'd carry them around?

18 A. Yeah, in hard copy, yeah.

19 Q. You tell us in your witness statement that there was

20 an intranet site, as well?

21 A. Yeah, there was an intranet site, yeah.

22 Q. Were the Acts and Codes issued under them on the

23 intranet site?

24 A. I don't recall. I can't --

25 Q. Did you -- whichever, in hard copy or in electronic

11

1 A. Yeah.

2 Q. -- in any investigation?

3 A. Absolutely, yeah.

4 Q. Did any training or anything else occur at that time, or

5 was it just a retitling of your --

6 A. Just a retitling. There was no other training.

7 Q. Do you know what the job re-evaluation exercise

8 consisted of?

9 A. No, I've got -- I've no idea. It was just retitled and,

10 yeah, we were told that "You're going to lead

11 investigations".

12 Q. Going back, then, to when you were the Investigation

13 Analyst. In addition to the two weeks of training, was

14 there a period of mentoring?

15 A. Yeah.

16 Q. Who was that by and how long did it last for?

17 A. So I was working to an Investigation Manager called

18 Aileen Saubelle, so she would have done the mentoring.

19 There was another Investigation Manager at the time, Ray

20 Pratt, who was there to mentor as well, and we would

21 essentially be mentored -- or I would essentially be

22 mentored by either of them. It was ongoing.

23 Q. Okay. So that sort of on-the-job training; is that

24 right?

25 A. Yeah, absolutely, yeah.

10

1 form -- often have recourse to what the relevant

2 legislation or the Code provided?

3 A. Not that I can recall, no.

4 Q. What was the purpose of carrying them around?

5 A. Just in case you needed to refer to them.

6 Q. In your years -- and I suppose we're looking now between

7 1995 and 2001 --

8 A. Yeah.

9 Q. -- when you became the Policy and Standards Manager --

10 A. Yeah.

11 Q. -- in those six years, there wasn't the occasion, the

12 occasion didn't arise, that you ever needed to consult

13 them?

14 A. Not really, no.

15 Q. In relation to your training, either the two weeks at

16 the beginning or the on-the-job training, did that cover

17 disclosure duties?

18 A. Not that I can recall. I do remember at some point

19 there would have been some sort of disclosure training

20 but I can't recall the details now, I'm afraid.

21 Q. Asking you now, what would you say is the duty that is

22 owed by an Investigator in relation to disclosure?

23 A. Anything that undermines the prosecution or supports the

24 defence.

25 Q. What must happen to such material?

12

1 A. It needs to be disclosed within your case file.
 2 Q. When you say it needs to be disclosed in the case file,
 3 is that in the file that's going to go up to the lawyer?
 4 A. Yeah, exactly, yeah, with various appendices to each
 5 case file. So, yes, you would disclose whatever within
 6 that.
 7 Q. When you were constructing a case file and there was
 8 material that undermined the proposed prosecution case
 9 or supported that of the suspect, how was that material
 10 provided to the lawyer?
 11 A. I didn't have that many cases that went to prosecution,
 12 myself.
 13 Q. In the six-year period?
 14 A. Yeah, yeah, there weren't that many. If there was
 15 material that needed to be provided, it would have been
 16 in hard copy in the case file.
 17 Q. I deliberately asked an open question there because one
 18 way of providing disclosure to a lawyer and then to
 19 a defendant is to list it.
 20 A. Yeah.
 21 Q. To say "There's document A, document B, document C".
 22 A. It would be on a schedule within the appendices.
 23 Q. Another way to provide disclosure is to provide the
 24 documents to the lawyer --
 25 A. Mm-hm.

13

1 Q. The only material that you found proved guilt?
 2 A. Yeah, from what I can recall, yeah. I mean, it's such
 3 a long time ago but yeah, I don't recall anything like
 4 that.
 5 Q. What about your training on pursuing reasonable lines of
 6 inquiry; can you recall what that was?
 7 A. No, I mean, the training was to pursue all reasonable
 8 lines of inquiry, I mean, to do a thorough
 9 investigation, and that's what we tried to do.
 10 Q. What would you understand that to mean, a "thorough
 11 investigation"?
 12 A. Well, yeah, it's a difficult one --
 13 Q. Would it include actively looking for material that
 14 might help --
 15 A. Yeah.
 16 Q. -- the suspect?
 17 A. Yeah, I guess it would, yes, but it's --
 18 Q. You guess or you know?
 19 A. Yeah, I'm not guessing. It's been such a long time
 20 since I've actually conducted an investigation. You
 21 know, if I could refer it to a specific type of enquiry
 22 it might be easier for me to tell you what I would be
 23 looking for.
 24 Q. Do you remember the introduction of the Horizon system?
 25 A. Yeah, vaguely. I think it was around '99/2000-ish.

15

1 Q. -- in a big pack?
 2 A. Yeah, yeah.
 3 Q. Which of those methods was used in your branch of --
 4 A. It would have been --
 5 Q. -- the Post Office?
 6 A. There would have been a schedule of the documents if
 7 there was anything but I don't recall ever having
 8 anything that would have undermined the defence -- or
 9 supported the defence, sorry.
 10 Q. Again, this is in this six-year period --
 11 A. Yeah.
 12 Q. -- '95 to 2001?
 13 A. Most of the cases I dealt with was pre-Horizon, so it
 14 was manual balancing within the branches for the most
 15 part and I don't recall having any cases at all that
 16 involved Horizon.
 17 Q. I'm going to come on to that in a moment because your
 18 time in investigation straddled the introduction of
 19 Horizon?
 20 A. Yeah, yeah, it did.
 21 Q. But just looking at it generally at the moment, you're
 22 saying in this six-year period you don't recall ever
 23 coming across a document that undermined the prosecution
 24 case or helped the defendant?
 25 A. Not that I can recall, no.

14

1 Q. That's right. Did you receive any training when it was
 2 introduced, as to the operation of the Horizon system?
 3 A. Not that I can recall. I think we went on a very brief
 4 kind of introduction but it wasn't thorough training on
 5 everything, no.
 6 Q. You say you think you went on a very brief introduction.
 7 Was that sort of in a branch, in an office somewhere --
 8 A. Yeah, yeah.
 9 Q. -- to see how the counter worked?
 10 A. Yeah, exactly that, yeah. I mean, the operation of the
 11 cash accounts and the balancing, essentially, was the
 12 same but on a computer, so yeah. The training wasn't
 13 sort of thorough. It was a brief overview, as you say.
 14 Q. Was that sort of a half day, a day, or longer?
 15 A. Probably half a day, I would say, but I genuinely can't
 16 remember.
 17 Q. Okay. Did you get any training at that time when
 18 Horizon was being introduced in the types of data that
 19 it produced, that might be relevant to your role as
 20 an Investigator?
 21 A. Not that I can recall, no.
 22 Q. Can you recall any discussion within the Investigation
 23 Team, "Look, we're now going over to a computer-based
 24 accounting system. This going to fundamentally alter
 25 the way that we obtain data in order to investigate and

16

1 perhaps prosecute subpostmasters. We need to know what
 2 this computer system, not in the branch, not what the
 3 keypad in the monitor looks like, but the back office
 4 functions; what data it produces; where they're stored;
 5 what they mean; how we interpret them". Was there
 6 anything like that?
 7 **A.** I genuinely can't remember. I'm sure there must have
 8 been some kind of a guide as to the sort of data that
 9 could be obtained from Fujitsu but I really don't
 10 remember, I'm afraid, I'm sorry.
 11 **Q.** Were you, as an Investigator, trained in how to analyse
 12 the data produced by Horizon?
 13 **A.** Not that I can recall, no.
 14 **Q.** Whose function was it, when Horizon was introduced,
 15 bearing in mind we're, in your case as an Investigator,
 16 talking about a one or two-year period, either 2000 or
 17 2001, essentially --
 18 **A.** Mm-hm.
 19 **Q.** -- whose function was it to analyse the data that
 20 Horizon produced?
 21 **A.** The Investigator.
 22 **Q.** Do you know when investigators were taught to look for
 23 any errors made by the system, by the Horizon system?
 24 **A.** Not that I can recall, no.
 25 **Q.** Was the potential for the system to make errors

17

1 relied on the reliability of the Horizon data too?
 2 **A.** Mm-hm.
 3 **Q.** Is that right?
 4 **A.** Yeah, that's correct, yeah.
 5 **Q.** Were you, or members of the Investigation Team around
 6 you informed of issues or problems that had arisen in
 7 the course of the testing, acceptance phase, and then
 8 the rollout of Horizon?
 9 **A.** No.
 10 **Q.** Were you told about any measures that had been put in
 11 place to monitor the continuation of such errors and the
 12 rectification of them?
 13 **A.** Not that I can recall, no.
 14 **Q.** You've told us that you don't recall dealing with a case
 15 involving Horizon; is that right?
 16 **A.** Yeah, not that I can recall, no. I may well have done
 17 but I can't remember.
 18 **Q.** When you say that, do you mean involving
 19 a subpostmaster?
 20 **A.** Yeah, yeah, subpostmaster. I dealt with --
 21 **Q.** What about the pension book fraud?
 22 **A.** Yeah, yeah pension fraud --
 23 **Q.** You must have been dealing with those?
 24 **A.** Oh, yeah, yeah, absolutely.
 25 **Q.** Again, as we've said, the investigation of that would

19

1 something that was identified when it was introduced to
 2 you as an Investigator?
 3 **A.** No, it wasn't, no.
 4 **Q.** In what way, if any, did the Investigation Team's
 5 investigation processes and practices change after the
 6 introduction of Horizon?
 7 **A.** I don't think we changed anything from what I can all.
 8 The majority of the cases that were being dealt with at
 9 that time were -- you know, early 2000 -- were pension
 10 allowance fraud, whether it was overclaims or whether it
 11 was stolen pension books. It was a problem right across
 12 the country and London was a particular hotspot, where
 13 I was working.
 14 So the Horizon data was actually very useful for
 15 that because it provided us with more information than
 16 we used to get from manual balancing. So Horizon
 17 transaction logs would identify the user ID, who
 18 processed, you know, the transaction and the time, which
 19 was, you know, very helpful.
 20 In terms of, as I say, other changes, I can't
 21 recall, to be honest.
 22 **Q.** That species of investigation is not something that the
 23 Inquiry is looking at, as you know.
 24 **A.** Yeah.
 25 **Q.** But that species of investigation is something that

18

1 involve consideration of data produced by Horizon?
 2 **A.** Yes, it would, yeah.
 3 **Q.** Were you, at this stage, told of any bugs, errors or
 4 defects in Horizon that might affect the reliability of
 5 the data that it produced?
 6 **A.** No, we weren't.
 7 **Q.** For that species of investigation, was there a method by
 8 which the Investigation Team obtained assurance as to
 9 the reliability of the data that the computer was
 10 producing?
 11 **A.** You know, I can't remember, I really can't. It's that
 12 far back.
 13 **Q.** We're going to go on later and talk about when you
 14 became the Assistant Casework Manager --
 15 **A.** Yeah, yeah.
 16 **Q.** -- and then the Casework Manager, about getting ARQ data
 17 and getting witness statements from Fujitsu.
 18 **A.** Yeah.
 19 **Q.** Back in '99, 2000 and 2001, when you were
 20 an Investigator, was there that facility available then?
 21 **A.** Yeah, I cannot -- I genuinely cannot remember that far
 22 back.
 23 **Q.** Were there team meetings amongst the Investigators?
 24 **A.** Yeah, we -- yeah, we would have team meetings.
 25 **Q.** Where were you based?

20

1 A. I was based in Croydon. So I was part of the South East
 2 Regional Team.
 3 Q. Were all of the Investigators within that regional team
 4 based there?
 5 A. No, no, they were dotted around. There was -- I think
 6 our regional office at that point was down in Tunbridge
 7 Wells and there were Investigators within the South East
 8 Regional Team based in Twickenham as well. I can't
 9 remember anywhere else. There may have been other
 10 people located. I mean, Investigators were located, you
 11 know, all over.
 12 Q. I'll look at it the other way around then. What method
 13 was adopted, if any, for the sharing of information
 14 amongst Investigators about issues that had arisen in
 15 the course of their investigations that might be
 16 relevant to other Investigators?
 17 A. Well, team meetings would be -- they weren't scheduled
 18 all the time. I mean, we had, probably, monthly
 19 meetings, maybe; maybe bimonthly.
 20 Q. You said they weren't scheduled?
 21 A. No.
 22 Q. So does that mean --
 23 A. Not that I can --
 24 Q. -- they were arranged *ad hoc*?
 25 A. Probably, yeah.

21

1 would have happened, yeah.
 2 Q. Who was your line manager at this time? So '99, 2000,
 3 2001?
 4 A. As an Investigator, my line manager was either Aileen
 5 Saubelle until she left -- I can't remember when she
 6 left -- and then Ray Pratt took over.
 7 Q. What form of management supervision did they take in
 8 relation to you?
 9 A. So we would have one to ones and working in the same
 10 office, we would obviously chat regularly. But, yeah,
 11 one to ones would be the formal supervision and they
 12 would be monthly.
 13 Q. You moved into the role of Assistant Casework Manager in
 14 2002?
 15 A. That's correct, yeah.
 16 Q. Can you say describe what the function of the Assistant
 17 Casework Manager was?
 18 A. From what I can recall, essentially, it was to support
 19 the Casework Manager, and the Casework Manager was
 20 responsible for movement of case files, provision of
 21 management information to senior lead team on cases.
 22 And we were -- from what I can recall at that point, we
 23 were kind of a focal point or a central point for the
 24 team, in terms of movement of case files and so on.
 25 Q. So just tell us what the purpose of the role was, of --

23

1 Q. What method, if any, then, was there for sharing
 2 information about relevant issues --
 3 A. Yeah --
 4 Q. -- cross cutting issues that applied or might apply
 5 across investigations?
 6 A. By way of circular, I think. That would come from one
 7 of the managers in the team, probably the Policy and
 8 Standards Manager. If there were particular issues that
 9 were relevant for everybody that needed to know about,
 10 a circular would be drafted up and sent out to
 11 everybody.
 12 Q. Would that be about law and policy and practice?
 13 A. Yeah.
 14 Q. I'm thinking about issues, concerns or facts: I've found
 15 this in my investigation; you know, when you try and get
 16 a witness statement out of Fujitsu, it's a bit difficult
 17 to get one; or you have the run around a bit or there's
 18 not a clear process; or "I've found that this kind of
 19 data is not sufficient for the conduct of my
 20 investigation, you want to ask them for this"; or "This
 21 person at Fujitsu is really helpful"; or "Get somebody
 22 else in Post Office involved further up the chain, they
 23 might help you to get this data"; that kind of thing,
 24 did that occur?
 25 A. I couldn't give you a specific example but I'm sure it

22

1 A. The purpose of Casework --
 2 Q. -- Casework Management?
 3 A. So the purpose of Casework Management, as I recall,
 4 would be to monitor the progress of case files, from
 5 raising a case. So you would receive -- you know, we
 6 used to have a spreadsheet that we ran for Casework. We
 7 also had a spreadsheet for incidents that were reported
 8 to us across the network in the South East Region, and
 9 we would just, you know, if there were a series of
 10 losses at a particular Crown Office, we would put that
 11 together and consider raising a case.
 12 Cash centres would be similar, if there were
 13 a pattern of losses, we would raise a case. For audit
 14 losses, pension allowance fraud, as we mentioned, was
 15 our main source of investigation at that point. I think
 16 pensions went on to card account, I think it was around
 17 2003, so that sort of stopped at that point.
 18 Q. First of all, was it a national function?
 19 A. Yeah, yes it was, yeah.
 20 Q. So did it apply to cases involving post offices in
 21 England and Wales?
 22 A. Yes, it did, yeah.
 23 Q. Did it involve any of the devolved administrations:
 24 Scotland or Northern Ireland?
 25 A. They were very much independent, so, you know, I can't

24

1 remember whether we recorded the details of those cases
 2 or not.
 3 **Q.** I got a sense, please correct me if this is wrong, that
 4 there were essentially two parts of it: one is the
 5 management of cases that were being investigated; and
 6 the second was analysis of data to see whether
 7 an incident or an issue should be investigated?
 8 **A.** Yeah, exactly.
 9 **Q.** Is that right?
 10 **A.** Yeah, that's correct, yeah.
 11 **Q.** Did your role involve both of those things?
 12 **A.** From what I can recall, yes.
 13 **Q.** What did the management of the existing cases consist
 14 of? What management of a case was needed?
 15 **A.** So when a case was raised, it would go to the
 16 Investigator and the Investigator would carry out
 17 whatever investigations they deemed appropriate, which
 18 may involve interviewing, you know, PACE interviews,
 19 et cetera. If that happened, reports would be written,
 20 taped summaries would be produced and the case would
 21 then be sent to the Casework Manager.
 22 **Q.** Sorry, at that stage, stopping you there, did the
 23 Casework Manager, whether the senior person or the
 24 assistant, you, have any role to perform before the file
 25 was received in the office?

25

1 could monitor the number of cases that were on hand, the
 2 number of interviews that were being conducted and, you
 3 know, the progress of the case when it was passed
 4 through to the Legal Team.
 5 **Q.** Why was it necessary to have that information?
 6 **A.** I don't know, really. I think that was just the process
 7 that we followed.
 8 **Q.** Okay. So you recorded that information. What else, if
 9 anything, did you do with the casework file?
 10 **A.** So the Casework Manager would just put a short memo in
 11 the file, just summarising that "Here's a case relating
 12 to pension allowance fraud, PACE interviews have been
 13 conducted", and the case is passed through to the
 14 Criminal Law Team for their review as to whether, you
 15 know, the case should proceed to prosecution or not.
 16 **Q.** So the Casework Management Team was responsible,
 17 physically, for receiving the file --
 18 **A.** Yeah.
 19 **Q.** -- and, physically, for passing it on to the lawyers?
 20 **A.** Exactly, yeah.
 21 **Q.** Was any compliance check undertaken?
 22 **A.** I can't remember when compliance came in --
 23 **Q.** So there was a time?
 24 **A.** There was a time when compliance was performed, yeah, on
 25 cases.

27

1 **A.** Not that I can recall, no.
 2 **Q.** Okay. So you weren't overseeing, managing or
 3 supervising the conduct of the investigation?
 4 **A.** No, no, that would be dealt with -- I mean, the
 5 Investigator was in charge of the conduct of the
 6 investigation and their team leader would supervise. So
 7 it was monitoring --
 8 **Q.** So -- I'm so sorry, I spoke over you.
 9 **A.** Sorry.
 10 **Q.** So management and oversight of the investigation was
 11 conducted out of the Croydon office; is that right?
 12 **A.** Yeah.
 13 **Q.** At a local level?
 14 **A.** Yes.
 15 **Q.** So you were saying then the file came in, and was that
 16 essentially the trigger for involvement of the Casework
 17 Managers?
 18 **A.** Exactly, yeah, and we would record all the details on
 19 the spreadsheet that we had at the time.
 20 **Q.** What was the spreadsheet for and what were the details?
 21 **A.** So the details would be the date the case was raising,
 22 branch involved, branch code, whether a PACE interview
 23 had happened or not.
 24 **Q.** Why were you recording that data or those data?
 25 **A.** For information, so that it was provided upwards so they

26

1 **Q.** What did compliance consist of?
 2 **A.** So that was all about the structure of the case file and
 3 the uniformity of the case file and reference to making
 4 sure that, within the body of the report, if there was
 5 reference to a particular exhibit, it would be included
 6 in the right appendices envelope, and paginated, red
 7 label. It was about consistency and uniformity, and --
 8 **Q.** Was it about quality?
 9 **A.** It was to drive up the standard of the case file to
 10 ensure a consistency and an accuracy in the way they
 11 were being presented. In terms of the --
 12 **Q.** Sorry to interrupt you, the things you've listed may
 13 sound like presentational issues --
 14 **A.** Yeah.
 15 **Q.** -- about the right stickers and the way it's set out.
 16 What about the quality of the investigation; was that
 17 addressed?
 18 **A.** Yeah, it's a long time ago to remember, to be honest,
 19 but there would be -- in terms of the format of the
 20 report, the structure of the report, reference to
 21 admissions made, or not, in terms of -- I'm just trying
 22 to think -- procedural failings, that type of thing,
 23 then we would be wanting to check that that had all been
 24 covered. I can't remember whether that was actually
 25 formally part of the compliance or not, yeah, I can't

28

1 recall.

2 **Q.** If you had to describe the nature of the exercise you
 3 undertook as the Assistant Casework Manager and then the
 4 Casework Manager, would you say it was more to do with
 5 procedure and process than it was to do with substance
 6 and quality of investigations?

7 **A.** I think that's fair, yeah.

8 **Q.** So would you, for example, read the investigation
 9 report, the witness statements, look at any exhibits,
 10 and think "Mmm, they haven't pursued this line of
 11 inquiry" --

12 **A.** No, I think.

13 **Q.** -- "send it back"?

14 **A.** No, I don't recall going into that level of detail.
 15 That would be more for the Team Leader to look at
 16 I would have thought.

17 **Q.** By team leader you mean back out on the areas?

18 **A.** Yeah. I mean, if there was anything glaringly obvious
 19 within the case file that had been missed, you know, if
 20 there was reference to a witness statement and there was
 21 no witness statement within the file, then that would be
 22 highlighted, but --

23 **Q.** That's again, a bit more process --

24 **A.** Yeah.

25 **Q.** -- rather than substance though, isn't it?

29

1 Transaction Enquiry Service, which was something you
 2 could access to obtain details of all the banking
 3 transactions that had happened and the team were
 4 responsible for DPA requests that would come in from
 5 external agencies asking for information. I mean,
 6 again, I can't remember the full details but that was
 7 another area.

8 Yeah, I think -- and we had a couple of managers
 9 come in at the time as well, who were sort of
 10 supervising the different postal officers or support
 11 staff that we had.

12 **Q.** Who were they?

13 **A.** Jason Collins and I think, from memory, he dealt with
 14 the casework side of it as well, and Natasha Bernard,
 15 and she dealt with the banking side.

16 **Q.** You tell us about this in your witness statement. You
 17 say that, due to the high volume of work within the
 18 Casework Team --

19 **A.** Yeah.

20 **Q.** -- and then following another team restructure, you were
 21 promoted to the role of Casework and Banking Fraud Team
 22 Leader?

23 **A.** Yeah.

24 **Q.** Which was essentially a similar role to that of the
 25 Casework Manager but brought into the team two other

31

1 **A.** Yeah.

2 **Q.** If there's a missing document?

3 **A.** Yeah, it is, yeah.

4 **Q.** Now, I think you, when you became Casework Manager, you
 5 had line management responsibility for four or five
 6 administrative support staff within Case Management; is
 7 that right?

8 **A.** That's correct, yeah.

9 **Q.** What did they do?

10 **A.** So there were various areas. When I became Casework
 11 Manager, I think it was around 2004, that was when
 12 I think there was a Horizon upgrade at that point
 13 because the Post Office Card Account came in. So we had
 14 a banking side to the team as well. So with Casework,
 15 we had support staff who covered -- well, we had
 16 somebody who dealt with, you know, stationery and stores
 17 for the whole team, so that was one role, and we had
 18 a support member of staff who used to monitor losses and
 19 issues at cash centres. We had somebody who covered the
 20 directly-managed branches, that -- they had
 21 a responsibility to report all losses to us, just Crown
 22 Offices.

23 And we had a member of staff dealing with the
 24 banking side. I think the system that they had access
 25 to, I think, from memory, it was called TES, which was

30

1 managers, the two people you've just mentioned, and you
 2 managed both of them too?

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

4 **Q.** So this is still working as Casework Manager,
 5 essentially, in Croydon?

6 **A.** Yeah.

7 **Q.** You took over two other managers and your job was
 8 retitled again?

9 **A.** Yeah, exactly, yeah. So I line managed Jason and
 10 Natasha and they line managed the support staff, so it
 11 took away that element from me.

12 **Q.** One of the things that you tell us in your witness
 13 statement was your responsibility was the provision of
 14 performance statistics to senior management.

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

16 **Q.** What were the statistics that you supplied to senior
 17 management?

18 **A.** So it would be the losses, the total value of losses for
 19 cases under investigation, the number of PACE
 20 interviews, the number of cases where charges had been
 21 preferred, summonses issued.

22 **Q.** Convictions?

23 **A.** Yeah. Convictions, yeah. I can't remember the rest, to
 24 be honest, but --

25 **Q.** Money recovered?

32

1 A. Yeah, I mean, POCA came -- started around 2003/4,
 2 I think.
 3 Q. The Act was 2002 and brought into effect in 2003.
 4 A. Yeah, the Act was 2003, yeah, but we didn't get
 5 Financial Investigators straightaway, I don't think.
 6 I think they came in around 2004-ish, I'm not
 7 100 per cent clear but --
 8 Q. Was there no recovery before POCA came into force?
 9 A. Well, realistically, no. I mean, most of the -- I mean
 10 in terms of benefit fraud and the pension frauds that
 11 we've spoken about, the loss wasn't the Post Office's.
 12 That would be the DWP, as it was, or I think it was DWP
 13 then, Benefit Agency. So, you know, that wasn't our
 14 losses. I think prior to POCA, compensation, civilly,
 15 would have been pursued but that wouldn't have been our
 16 team dealing with that, that would have been the Civil
 17 Litigation Team.
 18 Q. What was the purpose of the provision of these
 19 performance statistics to senior management?
 20 A. I presume to justify our existence, to demonstrate
 21 that -- you know, the role that we were performing.
 22 Q. Which senior management were provided with the
 23 statistics?
 24 A. That would have been the Head of Security team, whoever
 25 that was at the time.

33

1 to that, I don't know, but quite -- getting on for about
 2 2013/2012, just before I left the team, there was
 3 definitely objectives then. Whether they were there in
 4 2004-7, I can't be 100 per cent sure but they may well
 5 have been.
 6 Q. Were they for the Financial Investigators, those
 7 targets --
 8 A. I think they were -- no, I think --
 9 Q. -- or did they trickle through to people on the Casework
 10 Management Team?
 11 A. No, it was a team objective. So, you know, if there was
 12 bonuses it would have applied to the whole team.
 13 Q. So when you say the "whole team", do you mean the
 14 Security Team?
 15 A. Yeah, exactly. There weren't individual targets or
 16 anything like that.
 17 Q. Right.
 18 A. But, as I say, I'm not 100 per cent sure when bonuses
 19 came in.
 20 Q. Can you recall what they were tied to, what they were
 21 linked to. For the Security Team as a whole, what was
 22 the measure or the metric that meant that a bonus was
 23 achieved or not achieved or partially achieved?
 24 A. Just in terms of loss and recovery?
 25 Q. Yes, was that the only metric?

35

1 Q. You tell us in your witness statement that your line
 2 managers during this period, when you were the Casework
 3 Manager, under either or both of the titles, were Tony
 4 Utting and then David Pardoe?
 5 A. That's correct, yeah.
 6 Q. Were they located in the Croydon office?
 7 A. No, Tony Utting was, Dave Pardoe, I'm not sure where he
 8 was based. It was somewhere up North. I think it --
 9 I think it might have been St Helens but I can't be
 10 100 per cent sure now.
 11 Q. How did they manage you?
 12 A. So with Tony being based on Croydon, he was on hand and
 13 Dave Pardoe -- he would come down to London quite often
 14 to, you know, undertake one-to-ones but I would say
 15 I was well supported by both in my role.
 16 Q. Going back to the provision of performance statistics,
 17 to your knowledge, were any members of your team or you
 18 paid bonuses or performance related pay in this period?
 19 A. And this is going back to 2004-7?
 20 Q. Yes, so when you were the Casework Manager and then the
 21 same job under the different title until 2007?
 22 A. I think there might have been targets for recovery when
 23 Proceeds of Crime first came in but I can't remember.
 24 It would have been quite a low percentage. I was aware,
 25 when I was, you know -- later on, maybe you'll come on

34

1 A. There were lots of other metrics in terms of bonus.
 2 That would just be one element. But, as I say, I'm very
 3 vague on that, I've got to be honest.
 4 Q. Were any of the metrics, to your knowledge, tied to the
 5 number of convictions obtained?
 6 A. No, they weren't, no.
 7 Q. Was recovering money itself tied or a condition
 8 precedent to obtaining recovery getting a conviction?
 9 A. Well, POCA and recovery from POCA was obviously
 10 post-conviction but it didn't influence the way we dealt
 11 with financial investigations.
 12 Q. How do you know that?
 13 A. Well, I can only speak for myself, if you're conducting
 14 a financial investigation, you do the investigation
 15 thoroughly and, if there are no assets, there won't be
 16 a recovery. So there's nothing you can do to influence
 17 that.
 18 Q. One of the other functions, I think, as a Casework
 19 Manager was acting a single point of contact for
 20 requesting Horizon data from Fujitsu via the ARQ Audit
 21 Record Query process; is that right?
 22 A. Yeah, that's correct.
 23 Q. Did you perform that function when you were the
 24 Assistant Casework Manager?
 25 A. Again, it's such a long time ago, I can't recall but

36

1 quite likely, yes.

2 **Q.** Moving on, we're going to come back to what ARQ requests

3 consisted of and how they were processed in a moment.

4 So, in 2007, you moved into the role of an Accredited

5 Financial Investigator; is that right?

6 **A.** Yeah.

7 **Q.** An AFI?

8 **A.** That's correct.

9 **Q.** Was that in the Financial Investigation Unit?

10 **A.** It was, yeah.

11 **Q.** Where was the FIU?

12 **A.** That was based at Croydon, as well, and a separate

13 office. I can't remember if we were on the same floor

14 or not but, yeah, we were in the Croydon office, yeah.

15 **Q.** You tell us that involved seeking recovery of money

16 through the application of the Proceeds of Crime Act,

17 yes?

18 **A.** That's correct, yeah.

19 **Q.** That's in convicted cases; is that right?

20 **A.** That's correct.

21 **Q.** And making applications at the Crown Court for

22 production, restraint and confiscation orders?

23 **A.** That's correct, yeah.

24 **Q.** You tell us that your previous experience as an Auditor,

25 Investigator and Casework Manager provided you with

37

1 **Q.** To limit or regulate the number of investigations being

2 undertaken?

3 **A.** Yeah, from a financial investigation perspective, yeah.

4 **Q.** Does it follow that, as the figures progressively went

5 up, 10 to 20, and then 20 to another figure, which you

6 can't now remember --

7 **A.** I'm not sure it went up above 20.

8 **Q.** -- okay -- that that signalled that there was

9 an increase in work, an increase in -- if you hadn't

10 changed the figures, there would have been an increase

11 in work?

12 **A.** Yeah.

13 **Q.** An increase in the volume of convicted people?

14 **A.** I'm not sure the volume of convicted cases went up that

15 much, to be honest, but we would --

16 **Q.** What led to the increase in volume of work, then?

17 **A.** Well, there were -- cases were raised based on loss, so

18 they would be referred to as -- for financial

19 investigation which might involve some intelligence work

20 just to see what assets were there that didn't proceed

21 to a prosecution, and obviously the case would then be

22 closed from our perspective. So yeah, I -- I don't

23 recall the number of convictions going up significantly.

24 **Q.** Okay.

25 **A.** We'd always had quite a reasonable --

39

1 a good background and understanding of financial

2 investigation work?

3 **A.** Yeah, I believe so, yeah.

4 **Q.** By this time, 2007, were you aware of any bugs, errors

5 or defects in the Horizon system that could affect the

6 reliability of the data that you were working with?

7 **A.** No.

8 **Q.** I think you were line managed by Ged Harbinson; is that

9 right?

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

11 **Q.** Then Paul Southin after Mr Harbinson left?

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

13 **Q.** Was there a floor below which financial investigations

14 were not pursued, ie a lower bound figure?

15 **A.** Yeah, I can't remember what the value was. I think it

16 started off at £10,000 loss, although I might be wrong

17 around that. I know it went up to around 20,000 because

18 there was a high volume of cases. So I think the

19 trigger was around 20,000.

20 **Q.** When the figure went up, from 10 to 20 and then 20 to

21 another figure, was the reason for that the volume of

22 work?

23 **A.** Yeah, exactly, yeah.

24 **Q.** So this was meant as a control measure; is that right?

25 **A.** Exactly, yeah.

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1 **Q.** The number of cases required to be investigated went up?

2 **A.** Yeah.

3 **Q.** Did anyone ask why?

4 **A.** No, not that I can recall, no.

5 **Q.** Was there anything obvious that accounted for the number

6 of cases that required investigating going up?

7 **A.** Not that -- no, not that I can recall, no.

8 **Q.** Was this just a sort of mystery then, why the number of

9 cases requiring investigation, involving losses in

10 branches, going up?

11 **A.** I didn't -- I don't know that the cases were going up,

12 to be honest.

13 **Q.** You told us that they had to up the floor from £10,000

14 to £20,000 as a control measure --

15 **A.** Yeah.

16 **Q.** -- because the number of -- the workload was increasing

17 the number of investigations were increasing.

18 **A.** Mm.

19 **Q.** So I think it must follow that the number of

20 investigations must have been increasing, otherwise they

21 wouldn't have had to have introduced the control

22 measure?

23 **A.** I think the Financial Investigators were flooded with

24 cases from the outset. I mean, we didn't have financial

25 investigations pre-2003, whenever it was. So I don't

40

1 know that they'd gone up significantly. So I don't know
 2 that that's true because there were always a high volume
 3 of cases within the team.
 4 **Q.** So there was a high volume from the start, which was
 5 always too much and that's why they had to increase the
 6 floor from ten to £20,000?
 7 **A.** Yeah, I would say that's fair, yeah.
 8 **Q.** Rather than an increase in the number of cases requiring
 9 to be investigated from the start of financial
 10 investigations occurring?
 11 **A.** Well, as I say, there were always a high volume of cases
 12 for Financial Investigators to look at, right from the
 13 outset. Not all of them went to conviction though.
 14 **Q.** When you say there were always a high volume of cases,
 15 does that mean that there was a surprisingly high number
 16 of cases that required to be investigated or there
 17 weren't enough Investigators or both?
 18 **A.** I don't think it was any surprise that there were a high
 19 number of cases to be investigated because there always
 20 were high volumes of cases, and that was pre-Horizon and
 21 after Horizon. And, obviously, the number of
 22 Investigators dropped. There were numerous reviews,
 23 from my time in the team, you know, efficiencies where,
 24 you know, Investigators were lost. So yeah, from
 25 memory, no, there was always a high volume of cases to

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1 **A.** No, it had nothing to do with Horizon at all. It was to
 2 do with the segregation of mail. There was a contract
 3 between Royal Mail and the Post Office to correctly
 4 segregate mail into First Class, Second Class
 5 packets/parcels, and the role was reduce or achieve
 6 a better compliance, because there were penalties,
 7 financial penalties for the business, if mail wasn't
 8 segregated correctly. So I was involved in driving up
 9 compliance for that.
 10 **Q.** Did you remain in that role until you left in May '16?
 11 **A.** Yes, I did, yeah.
 12 **Q.** In that time, January '13 to May '16, did you have
 13 anything to do with the Horizon system?
 14 **A.** Nothing at all, No.
 15 **Q.** So, looking at the period of 1995 when you joined the
 16 Security Team, until 2012 when you left, to go over,
 17 essentially, on this project, that 17-year period, how
 18 would you describe the culture within the Security Team?
 19 **A.** When I joined the Security Team it was quite a small
 20 team. We were regionalised and it was a great team to
 21 work with. It was a -- really good people working
 22 together, it was, you know, good culture. No question
 23 about that. I think we became a national team at some
 24 point, which, again, yeah, the culture was always very
 25 positive. I was well supported by line manager

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1 be dealt with.
 2 **Q.** In 2012 you moved into the Information Security Team.
 3 **A.** Yeah, I was seconded onto a project.
 4 **Q.** What was the project about?
 5 **A.** It was PCCI.
 6 **Q.** What's that about?
 7 **A.** It was Payment Card Industry, not entirely clear.
 8 I can't really remember but we had a contractor come
 9 into the business and I was asked to sort of support her
 10 obtaining a certificate for PCCI.
 11 **Q.** Was this a project that lasted about eight to ten
 12 months?
 13 **A.** Yeah, I think so, yeah. I stayed in the team for around
 14 ten months, I think, and on the project with her --
 15 I can't remember exactly how long.
 16 **Q.** Did it have anything to do with the Horizon system?
 17 **A.** Not in terms of Horizon losses no, not that I can
 18 recall.
 19 **Q.** Did it have any --
 20 **A.** It was more to do with banking cards.
 21 **Q.** Okay, I think in January '13 you left that role and
 22 became Mail Conformance Manager?
 23 **A.** Yeah.
 24 **Q.** Just briefly, what was the Mail Conformance Manager and
 25 did it have anything to do with Horizon?

42

1 management, 20 -- when was it now? I can't remember
 2 when Mr Scott came into the team as the Head of
 3 Security, I think it was around 2008, maybe. Yeah,
 4 initially it was fine.
 5 I remember him delivering a strategy on how the team
 6 was going to be taken forward. But the team -- there
 7 seemed to be a lot of changes from that point on, a lot
 8 of Senior Managers came and left. The team was reduced
 9 again. There was a movement from -- well, a movement to
 10 a hub way of working. So people that were based out
 11 wherever they'd been, if they were based out in -- on
 12 the South Coast or wherever, the hub for the South was
 13 London and everybody had a requirement to be in London
 14 to work, which, effectively, moved a lot of people out
 15 of the role because the travel would just have been too
 16 much, so they had to find other roles within the
 17 business, which, you know, was I think difficult for
 18 a lot of people.
 19 Yeah. The culture changed slightly but as we --
 20 when we moved into head office it became -- personally,
 21 it didn't affect me but you we knew there were rumblings
 22 of people not being very happy within the team so, yeah,
 23 I was quite happy to leave when I left.
 24 **Q.** When I asked you the question about what the culture was
 25 like, you said initially it was fine.

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1 A. Yeah, yeah.
 2 Q. Then you went on to talk about something else.
 3 A. Mm.
 4 Q. What was it like after it ceased to be fine?
 5 A. Well, it just wasn't a happy team to be in, from sort of
 6 2008/9. It wasn't particularly happy.
 7 Q. Was that -- and I'm going to divide things into two
 8 here, which might not be the only way of doing things --
 9 was that about your own working conditions and
 10 practices, ie the things that affected you as employees
 11 of Post Office -- salary, job structure, management
 12 lines of reporting, distance of travel to work --
 13 A. Mm.
 14 Q. -- pay and conditions, those kind of things --
 15 A. Mm.
 16 Q. -- or was it, on the other hand, a substance of what you
 17 were being required to do?
 18 A. Yeah, it was -- it was just a feeling of how the team
 19 was. When we were regionalised or when we were within
 20 the South East Region, there was -- it was more
 21 personable. It just seemed to change -- the culture of
 22 the business seemed change, in my opinion. So, you
 23 know, I was very happy to leave, personally.
 24 Q. Do you know how the Post Office Investigation Department
 25 was viewed by other parts of the business, including by

45

1 members of the same team as him, the Criminal Law
 2 Team --
 3 A. Financial Investigator?
 4 Q. -- before you were a Financial Investigator.
 5 A. Yeah, case files were sent to the Criminal Law Team. As
 6 I say, I didn't have any case files when Mr Singh joined
 7 the Post Office. We would submit case files through the
 8 Criminal Law Team that were based in Croydon. I think
 9 Mr Singh was part of that team.
 10 Q. Okay. Can we move on, please. I'm going to turn to
 11 investigation policies, strategies and decisions to
 12 prosecute, to start with, your role in relation to Post
 13 Office investigations and prosecutions against
 14 subpostmasters.
 15 You tell us in your witness statement, and this is
 16 paragraph 6 on page 5 -- no need to turn it up -- you
 17 say that your role in relation to disciplinary matters
 18 was limited to those staff you line managed directly --
 19 A. That's correct, yeah.
 20 Q. -- and you don't recall ever having to deal with any
 21 disciplinary issues in your time in Post Office?
 22 A. No.
 23 Q. When you were an Investigation Manager, you interviewed
 24 suspect offenders and were responsible for disclosure in
 25 those cases?

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1 subpostmasters?
 2 A. Well, I'd imagine the Post Office Investigation
 3 Department wasn't very popular because of the job we
 4 did. I can go back to the days of being
 5 an Investigator, you know, pre-Horizon. We had a very
 6 good relationship with the subpostmasters' Federation at
 7 that time. They were very supportive of the work we
 8 were doing in terms of the pension allowance frauds. We
 9 were always invited to interviews, and what have you,
 10 so, you know, we got on very well but I don't know how
 11 the relation with the Federation developed after that.
 12 Q. You tell us in your witness statement that, after the
 13 Post Office separated from Royal Mail Group in about
 14 2011, prosecutions were dealt with by a senior lawyer,
 15 Jarnail Singh, and external solicitors?
 16 A. Yeah.
 17 Q. Did you submit files to Mr Singh at all?
 18 A. No, we didn't have case files as Financial
 19 Investigators. We would have submitted, you know, our
 20 restraint orders and Section 16 statements for
 21 confiscation through Mr Singh, and we would have sought
 22 his approval. We needed authority from a Senior
 23 Authorising Officer and also, yeah, Mr Singh, before we
 24 did anything.
 25 Q. So you did earlier on submit cases on to Mr Singh and

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1 A. Yeah.
 2 Q. Did that role involve gathering information and evidence
 3 that might be relevant to a disciplinary proceeding
 4 against a subpostmaster?
 5 A. Yeah, that would do, yeah. The discipline side of
 6 subpostmasters, yeah, that would be -- we would produce
 7 a report for that and that would include reference to
 8 any evidence that had been identified in the
 9 investigation, so -- and that would be sent to the
 10 Contract Manager for discipline.
 11 Q. You were involved, at that time as an Investigation
 12 Manager, in disclosure decisions?
 13 A. Yeah.
 14 Q. You were responsible for processing disclosure as
 15 a Casework Manager?
 16 A. Yeah.
 17 Q. And, as a Financial Investigator, were you responsible
 18 for disclosure?
 19 A. Yeah.
 20 Q. In all three functions, did you liaise with members of
 21 the Criminal Law Team in relation to your own cases?
 22 A. Yeah.
 23 Q. Did you liaise with the Civil Litigation lawyers within
 24 the Post Office, in each of those three functions?
 25 A. I -- my involvement with Civil Litigation, from memory,

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1 was in relation to provision of ARQ data, if I was asked
 2 in my spot(?) role as Casework Manager.
 3 **Q.** So that was only when you were Assistant Casework
 4 Manager and Casework Manager?
 5 **A.** Yeah, exactly, yeah.
 6 **Q.** Did you have any involvement in what might be described
 7 as litigation strategy or prosecution strategy --
 8 **A.** No.
 9 **Q.** -- at any point in your career in the Post Office?
 10 **A.** No, not at all.
 11 **Q.** You tell us, in terms of policies/procedures that Post
 12 Office's policy in relation to the investigation and
 13 prosecution of offenders was the same for all Post
 14 Office employees, as well as for subpostmasters,
 15 managers and staff?
 16 **A.** Yeah, that's correct.
 17 **Q.** You tell us about a "Triggers & Timescales" document
 18 which broadly outlined the types of cases that the team
 19 would investigate and the expected timescales for
 20 completion?
 21 **A.** Yeah, that's correct.
 22 **Q.** Can we look, please, at POL00105221, please. Can you
 23 see that this is described as a document of the Security
 24 Operations Team?
 25 **A.** I don't have anything on my screen.

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1 Utting.
 2 **Q.** What was the purpose of it?
 3 **A.** To make people aware of how we dealt with cases and what
 4 the timescales or the expectations would be for
 5 processing cases.
 6 **Q.** If we control on through the document, please, and
 7 scroll down, please. We can see, essentially, the steps
 8 in the first two columns and then the time by which that
 9 step must be taken in the last column; is that how it
 10 works?
 11 **A.** Yeah, that's correct, yeah.
 12 **Q.** Then, if we scroll on, please, that's depicted in
 13 a different way in that infographic there.
 14 **A.** Yeah.
 15 **Q.** Then if we can look, please, at POL00105220. If we
 16 scroll down, please, a little bit, just so we get the
 17 heading, as well. Thank you.
 18 Do you remember this document or the type of
 19 information contained on it?
 20 **A.** Yeah, I think it's sort of not that familiar now but,
 21 yeah, it looks like a document that went with the
 22 "Triggers & Timescale".
 23 **Q.** The other one was more about timeliness and the steps
 24 which must be taken within certain time frames; is that
 25 right?

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1 **Q.** Well, I'm sorry about that. Somebody will come and
 2 press a button on your screen. It may have gone to
 3 sleep. *(Pause)*
 4 Is that now working?
 5 **A.** Yeah.
 6 **Q.** Can you see the "Triggers & Timescales" document on the
 7 screen?
 8 **A.** Yes, I can, yeah.
 9 **Q.** Is this the type of document you were referring to when
 10 you referred to a "Triggers & Timescales" document --
 11 **A.** Yes, it is.
 12 **Q.** -- in your witness statement?
 13 **A.** Yes, it is, yeah.
 14 **Q.** When would this have been operative, ie in which of your
 15 many functions would this have been relevant?
 16 **A.** I would say casework, probably 2002, 2004 to 2007.
 17 **Q.** Who was this addressed to?
 18 **A.** I think this was a document put together for the Network
 19 to make them aware of the cases we dealt with and what
 20 the timescales for dealing with them were.
 21 **Q.** So this was something that came out from the centre, as
 22 it were, from the Casework Management Team to the
 23 regions?
 24 **A.** It's not a document that was put together by Casework,
 25 I don't think. I think this was put together by Tony

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1 **A.** Yeah, that's correct.
 2 **Q.** Whereas this is about raising cases, ie what must be
 3 investigated, what may be investigated and what need
 4 not --
 5 **A.** Yes.
 6 **Q.** -- is that right?
 7 **A.** That's correct yeah.
 8 **Q.** So looking at the first box, "Loss of any amount", where
 9 there hasn't been a suspension, "Case Raise"; what does
 10 that mean?
 11 **A.** Raise a -- well, it just means --
 12 **Q.** Investigate?
 13 **A.** -- raise a formal case for investigation, yeah.
 14 **Q.** So if we fell in that first row there, that need not be
 15 or should not be raised for investigation; is that
 16 right?
 17 **A.** That's correct, yeah.
 18 **Q.** Then there's the second box, if the loss is less than
 19 £1,000, same answer; is that right?
 20 **A.** Yes.
 21 **Q.** Between £1,000 and £5,000, there seemed to have been
 22 discretion as to whether or not to raise a case or not,
 23 for investigation; is that right?
 24 **A.** That's correct.
 25 **Q.** It says, "to be discussed with the Contracts Team". Who

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1 would decide, first of all, who would conduct that
 2 discussion with the Contracts team?
 3 **A.** So if we're talking about audit losses, that would
 4 probably be the Team Leader for the area, I would think.
 5 I mean, when audits were reported to the team, the
 6 Auditors -- they may well have a phone number of
 7 an Investigator, just because they dealt with them
 8 previously. So sometimes an auditor would contact
 9 an Investigator directly but, generally speaking,
 10 I would say the Team Leader would be the one.
 11 **Q.** Who would make that decision, whether or not, within
 12 that third row, to investigate or not?
 13 **A.** I would say it would be a joint decision between the
 14 Contract Manager and the Investigator or the Team
 15 Leader, whoever took the call.
 16 **Q.** Then scroll down, please. Loss more than £5,000,
 17 investigate; is that right?
 18 **A.** That's what that's saying, yeah.
 19 **Q.** Is that your memory of what the trigger for a certain
 20 investigation was, a loss of over £5,000?
 21 **A.** I actually thought it was higher than that but, if
 22 that's what the document says. I don't know whether
 23 there would have been a document following this. Do you
 24 know what date this was from?
 25 **Q.** If we go back to the first page at the top, please.

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1 not there should be an investigation or not?
 2 **A.** I wouldn't have said so, no. I mean, if there was clear
 3 evidence of dishonesty, then that would have been
 4 investigated regardless of the loss but, as I said, the
 5 team reduced over time. So we had to be a bit more
 6 selective about the cases we would take on. I think
 7 when I first joined the team, back in the '90s, I think
 8 we had somewhere in the region of 90 Investigators.
 9 There were at least nine or ten teams, I think, maybe
 10 eight or nine teams, maybe 70 or 80 Investigators. As
 11 I say, it's not clear to me but, by the time I left, we
 12 had considerably less so we had to be more selective on
 13 the cases we took.
 14 **Q.** This does include MO, *modus operandi* --
 15 **A.** Yes.
 16 **Q.** -- as a factor to consider?
 17 **A.** Yeah.
 18 **Q.** I'm just asking, to your knowledge, was the decision on
 19 whether to investigate or not primarily based on the
 20 amount of alleged loss which the table tends to indicate
 21 or an understanding of what it was alleged that the
 22 postmaster had done?
 23 **A.** I mean, the table indicates that, I agree. But, if
 24 there was a clear evidence of dishonesty, I'm sure that
 25 we would have raised a case on it regardless of the

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1 I can check to which document this was an appendix and
 2 over the break I might be able to establish a date?
 3 **A.** Okay, yeah, I mean, 5K feels quite okay.
 4 **Q.** It feels low to you?
 5 **A.** It does, yeah, but that may well have been the case at
 6 that time or it will would have been the case at that
 7 time but yeah, I think it might have been increased.
 8 **Q.** If we scroll down to the bottom, please, it says:
 9 "This is a guide only, as each loss will ... be
 10 assessed on its own merits and will include other
 11 factors (eg admissions, resource, timescales
 12 *modus operandi* ...)"
 13 Yes?
 14 **A.** Yes.
 15 **Q.** The document doesn't list whether there was evidence of
 16 dishonesty by the postmaster as a tracker for
 17 investigation. It's focused on the loss being the key
 18 into whether to investigate or not.
 19 **A.** Mm.
 20 **Q.** Is that right?
 21 **A.** Yeah, I mean, obviously, the investigation would
 22 determine whether there was dishonesty or not but, yeah,
 23 I mean, that's essentially what the document says, yeah.
 24 **Q.** Was that the approach that was taken over time, that the
 25 amount of loss was the determining factor on whether or

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1 loss, whether it was, you know -- as long as it was over
 2 5,000 or thereabouts, then a case would have been
 3 raised, I'm sure.
 4 **MR BEER:** Thank you.
 5 Sir it's 11.20 now. That might be an appropriate
 6 moment for a break. Can we break until 11.35, please.
 7 **SIR WYN WILLIAMS:** Yes, of course.
 8 **MR BEER:** Thank you, sir.
 9 **(11.19 am)**
 10 **(A short break)**
 11 **(11.35 am)**
 12 **MR BEER:** Sir, good morning. Can you continue to see and
 13 hear us?
 14 **SIR WYN WILLIAMS:** Yes, thank you, yes.
 15 Thank you very much.
 16 Mr Ward, can we look, please, at POL00104747. If we
 17 just look at the foot of the page, please. You'll see
 18 there's no date here. Go over the page, keep going.
 19 You will see that it's consistently not dated at the
 20 foot of the page but that this is a document that is
 21 said to be effective from March 2000; do you see that?
 22 **A.** Yes.
 23 **Q.** At this time, you would have been an Investigation
 24 Manager?
 25 **A.** That's correct, yeah.

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1 Q. If we go back to page 1, please, you'll see that it's
2 described as a "Casework Management Document", part of
3 "Investigation Policy", and it's addressed to, I think,
4 "Link to Accountabilities", Security Managers. That
5 would include you, yes?

6 A. Correct.

7 Q. "The aim ... is to ensure that adequate controls are in
8 place to maintain standards throughout investigation
9 processes."

10 So I suspect this is a document you can no longer
11 remember but would have been something with which you
12 would have been familiar at the time?

13 A. Exactly, yeah.

14 Q. If we look at reporting standards in the third box down
15 and look at the sort of preamble to what we're going to
16 look at in a moment, some criticism of refusing to
17 disclose investigation reports, yes, in the first bullet
18 point there? If we can go over the page, please, to the
19 second page and look at the third bullet point.

20 "In England and Wales, Legal Services will decide
21 what information will be disclosed to the Defence in
22 compliance with the [CPIA] 1996."

23 So I've moved over all the parts that are about
24 disciplinary and employment processes to look at crime.

25 Then the next bullet point down:

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1 [CPIA] 1996 still apply."

2 Thank you. That can come down.

3 With that document in mind, can you tell us how you,
4 when you were writing reports as an Investigation
5 Manager, addressed the issue of what were described
6 there as security procedure failures, operational
7 procedure failures, procedural weaknesses or procedural
8 failings?

9 A. So I'm going back probably 22 years, since I probably
10 dealt with the case. So it's very difficult for me to
11 remember any specific cases that I dealt with where
12 there were procedural failings.

13 Q. Do you think from that --

14 A. There obviously would have been some but I really just
15 cannot remember. There was one case I can remember,
16 sorry, that just come back to me. It was a case
17 involving a recruitment of a counter clerk working at
18 a Crown Office. Cutting a long story short, the person
19 that turned up at the branch as a new member of staff
20 wasn't the person that went for an interview and the
21 only way it was found out was just his misfortune that
22 the person that interviewed him was the branch manager
23 at the office he turned up at, and the procedure failing
24 there was that there was no photograph attached to the
25 documents that were sent to the branch manager. So that

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1 "If, during the course of an enquiry, failures in
2 security or operational procedures are identified which
3 may or may not be directly connected with the offence/s
4 under investigation, a separate report should be made to
5 the relevant function or line manager in order that
6 remedial action should be taken. In the interests of
7 maintaining good industrial relations and to maintain
8 confidentiality, it is important that individuals are
9 not named in this report and recommendations are made in
10 general terms. The separate report [will] need to be
11 listed on [CS006D and possibly on E]. Legal Services
12 will then decide whether such a report should be
13 disclosed to the Defence under the [CPIA] 1996."

14 Then the next bullet point:

15 "The issue of dealing with information concerning
16 procedural failures is a difficult one. Some major
17 procedural weaknesses if they become public knowledge
18 have the potential to assist others to commit offences
19 against the Post Office, or to undermine the Prosecution
20 case, or to bring Consignia into disrepute, or to harm
21 relations with major customers ... Unless the Offender
22 states that he is aware that accounting weaknesses exist
23 and that he took advantage of them, it is important not
24 to volunteer that option to the Offender during
25 interview. The usual duties of disclosure under the

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1 was a procedural failing, which was highlighted in the
2 report. So any procedural failings that you would come
3 across --

4 Q. When you say "it was highlighted in the report" what do
5 you mean by "the report"?

6 A. So the offender report I would have prepared for that
7 case.

8 Q. This tended to indicate that there needed -- that needed
9 to be addressed separately in a different document that
10 went to and only went to Legal Services. Can you
11 remember that being the rule?

12 A. So the procedural failing would be in the report that
13 went to Legal Services but the procedural failing in the
14 report that went to the discipline manager wouldn't be
15 there.

16 Q. Why was that? Did you understand what the rationale was
17 for that?

18 A. So my understanding of the rationale for that would be
19 that the discipline report would be available to the
20 person being disciplined, which would then mean that
21 you're highlighting a failing that could be communicated
22 to everyone else.

23 Q. Might that not be relevant to their discipline case?

24 A. Well, in the case I dealt with not really, I don't
25 think, no.

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1 Q. Can you recall a case, other than the one you've just
 2 mentioned, in which it would be relevant or may be
 3 relevant?
 4 A. Not off the top of my head, no, sorry.
 5 Q. Okay, in relation to criminal cases, it seems that the
 6 documents were not to be sent to, from this policy, the
 7 Criminal Law Team, but a report, setting out what the
 8 procedural weakness or failing was, was to be sent to
 9 the Criminal Law Team. Are you saying that was
 10 essentially within the offender report?
 11 A. Sorry, the procedural failing that was identified within
 12 the offender report?
 13 Q. Yes.
 14 A. It would be in the offender report, yes.
 15 Q. Right, okay, there wasn't a yet third report --
 16 A. No.
 17 Q. -- a separate report?
 18 A. No.
 19 Q. That was in the offender report?
 20 A. Yeah.
 21 Q. Okay. What was your role as an Investigator in ensuring
 22 that the Post Office in such cases complied with its
 23 duty of disclosure?
 24 A. So my role for disclosure would be -- it's the
 25 Investigator's role to disclose everything that would

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1 Q. -- 2001, you told us earlier?
 2 A. I joined in '95 as an Analyst. From '97 to 2001, I was
 3 an Investigation Manager and, in that time, I can think
 4 of three that I can remember. There may have been one
 5 or two more but certainly no more than five, I would
 6 have thought.
 7 Q. Who acted as the Disclosure Officer, if you did not?
 8 A. Well, I would have been the Disclosure Officer as such.
 9 You know -- so it's my responsibility but I didn't see
 10 myself as a Disclosure Officer. I know it's my
 11 responsibility to be the -- to disclose everything, but
 12 I saw myself as the Investigating Officer. I appreciate
 13 it's a kind of a dual control, but, yeah, I wouldn't
 14 have seen myself as singularly a Disclosure Officer.
 15 But yes, I knew it was my responsibility.
 16 Q. Your responsibility to do what?
 17 A. To disclose everything that was relevant to the case
 18 and, if it supported the defence or undermined the
 19 prosecution, then it needed to be disclosed.
 20 Q. When you became the Assistant and then the Casework
 21 Manager, was it the Casework Manager's responsibility to
 22 ensure that all the reasonable lines of inquiry had been
 23 exhausted?
 24 A. No, not that I can recall, no.
 25 Q. You told us earlier that those working in Casework might

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1 undermine the prosecution, support the defence.
 2 Q. You're working, I think, here hypothetically because you
 3 never found a case in which there was anything that
 4 undermined the prosecution?
 5 A. Not that I can recall. I mean, as I say, I'm going
 6 back -- 22 years was the last time I dealt with a case
 7 myself. So I am sure there may have been but I just
 8 can't recall.
 9 Q. Was the limit of the responsibility to make Legal
 10 Services aware of it or did the Investigator perform
 11 a separate role of Disclosure Officer?
 12 A. My role would have been to have made Legal Services
 13 aware of it. That's my understanding.
 14 Q. Did you ever act as a Disclosure Officer in any
 15 prosecution case?
 16 A. No, I didn't, no.
 17 Q. How many cases of yours, when you were an Investigation
 18 Analyst and an Investigation Manager, went to
 19 prosecution?
 20 A. Ooh ... I would say three or four.
 21 Q. So that's between 1995 and 2001?
 22 A. Yeah. Yeah, because I was First Officer from about
 23 2004. Sorry, I've got my times mixed up, haven't I?
 24 Q. Yes, you became Policy and Standards Manager --
 25 A. Yeah, 2004.

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1 point out anything obvious, like a missing witness
 2 statement or a missing exhibit?
 3 A. Yeah.
 4 Q. Does that describe the extent of Casework Management's
 5 oversight of the quality or the substance of
 6 an investigation?
 7 A. Yeah, as I say, from memory, the Team Leader would be
 8 the one who would have more oversight of the case and
 9 the conduct of the case.
 10 Q. Did files have to go through a team leader before they
 11 were submitted to Casework?
 12 A. I think so, yeah.
 13 Q. Do you know what function the team leader performed,
 14 what checks the team leader performed?
 15 A. No, I don't know.
 16 Q. When you were an Assistant Casework Manager and
 17 a Casework Manager, who made the decision whether or not
 18 a person was to be prosecuted or not?
 19 A. That would be the lawyer within the Criminal Law Team --
 20 sorry, no, the Criminal Law Team would advise on the
 21 charges. The decision to prosecute would be down to
 22 whoever was the prosecuting authority, which was
 23 generally the Head of the Security Team or Investigation
 24 Team, whatever it was at the time.
 25 Q. So who would make the decision to prosecute?

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1 A. The decision to prosecute would -- from my recollection,
 2 would be whoever the prosecuting authority was at the
 3 time. So it could be the Head of Security had
 4 changed -- the prosecuting authority would change, in my
 5 time in the team.
 6 Q. Did you get to see all the advices that the Criminal Law
 7 Team prepared?
 8 A. They would -- yeah, I mean, the Criminal Law Team would
 9 put an advice in the case papers that would come back to
 10 the Casework Team.
 11 Q. So the whole file would come back to you physically --
 12 A. Yeah.
 13 Q. -- with advice added?
 14 A. Yes, that's correct, yeah.
 15 Q. In your witness statement -- no need to look at it, it's
 16 paragraph 16 -- you say the case file would be submitted
 17 by the Casework Team to the Criminal Law Team, who would
 18 prepare an advice and detail any charges based on the
 19 evidence. Is that right, that before the file came back
 20 to you, they would outline the charges that they
 21 suggested be pursued?
 22 A. Yeah, or they would come back with an advice for further
 23 enquiries to be made and not necessarily make
 24 a decision, so --
 25 Q. Did that happen?

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1 the Criminal Law Team.
 2 Q. Was that a document with which you and the team were
 3 familiar, at the time the Code for Crown Prosecutors?
 4 A. I wasn't familiar with it, no.
 5 Q. Was any filter applied by the Casework Team by reference
 6 to evidential sufficiency, "We're not going to put
 7 a case up to the Criminal Law Team and the Head of
 8 Investigations if, on our review of the file, there's
 9 not sufficient evidence"?
 10 A. No, there wasn't, no.
 11 Q. So were you literally postboxing it?
 12 A. Essentially, yes.
 13 Q. As we said earlier, the compliance didn't address that
 14 evidential sufficiency; the compliance checks didn't
 15 address evidential sufficiency?
 16 A. No.
 17 Q. Thank you. You tell us in your witness statement that
 18 you're not aware of the tests applied by either the
 19 Criminal Law Team or the Head of Investigations in
 20 decided whether to prosecute or not; is that right?
 21 A. That's correct.
 22 Q. So is it right to say that the role played by Casework
 23 Team members in decisions to prosecute was essentially
 24 moving files from one place to another?
 25 A. Yes, I would agree with that, yeah.

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1 A. Yeah, yeah, that would happen quite frequently, yeah.
 2 Q. So "We're not making a decision now, further
 3 investigatory work needs to be undertaken"?
 4 A. Yes, absolutely. That would happen quite frequently,
 5 yeah.
 6 Q. Would you then pass the file back down the chain or
 7 along the line to the Investigation Manager?
 8 A. Yes.
 9 Q. You carry on in your witness statement:
 10 "The Head of Investigations or whoever was the
 11 Prosecution Authority at the time would have sight of
 12 the case file and would make the final decision on
 13 whether to prosecute or not."
 14 Do you know what test or approach the Head of
 15 Investigations took when deciding whether to prosecute
 16 or not?
 17 A. No, I don't, no.
 18 Q. In Casework, did you know what standard had to be
 19 achieved before a decision positively to prosecute was
 20 made?
 21 A. No.
 22 Q. Were you aware of the Code for Crown Prosecutors?
 23 A. I've heard of it but I wouldn't know the details of it.
 24 That would be -- from my perspective, that would be
 25 a decision for the Criminal Law Team or the lawyer in

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1 Q. Why didn't the Investigation Team just send the file to
 2 the Criminal Law Team?
 3 A. Well, we had to do the compliance, but -- and record the
 4 details of the case because we had a casework
 5 spreadsheet that we were running, that we were required
 6 to do, so that we could, you know, maintain details of
 7 the case, where the case is at in terms of decision
 8 making. That was essentially it, I think.
 9 Q. So it was about numbers and -- you called them earlier,
 10 whether the stickers were in the right place or,
 11 I think, one of the casework compliance things was
 12 whether something was written in the right font and of
 13 the right size?
 14 A. That was part of the compliance, yeah.
 15 Q. It was that kind of thing compliance was aimed at?
 16 A. Yeah.
 17 Q. Do you know why the compliance didn't look at substance?
 18 A. No, I didn't. I don't know.
 19 Q. Thank you.
 20 Can we turn to your role in Casework in obtaining
 21 data and witness statements from Fujitsu. You tell us
 22 over a large passage in your witness statement -- it's
 23 paragraphs 34 to 54 of your witness statement, your
 24 involvement in obtaining ARQ data and analysing it, yes?
 25 A. Me analysing it?

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1 Q. Yes, ie that you didn't?
 2 A. Yeah, I didn't no.
 3 Q. What training did you receive, if any, in the obtaining
 4 of data from a computer system for the purposes of
 5 disclosure in criminal proceedings?
 6 A. I didn't have any training at all in that. I was
 7 trained how to obtain event and transaction logs within
 8 a branch because that was available, I believe, for
 9 about a month, and that would just be in the form of a
 10 till roll.
 11 MR BEER: Sorry, sir, the stenographer said something that
 12 I didn't hear.
 13 THE STENOGRAPHER: I didn't catch the end of the answer,
 14 sorry.
 15 MR BEER: I think the stenographer didn't catch the end of
 16 the last sentence.
 17 A. To do with the till role?
 18 Q. Yes, I think that was the one.
 19 A. So within the branch, you could obtain event and
 20 transaction logs, I believe it went back a month, which
 21 were quite unwieldy to look through and, you know,
 22 analyse, but I was -- I was shown how to do that. But,
 23 in terms of the data that was provided by Fujitsu,
 24 I didn't receive any formal training at all. It was in
 25 the form of an Excel spreadsheet, so -- and the columns

1 A. No.
 2 Q. Was that ever the subject of discussion within the
 3 Casework Management Team when you were obtaining this
 4 data from Fujitsu?
 5 A. Not that I can recall, no.
 6 Q. We're getting computer data from this person over here,
 7 this organisation over there, there are some
 8 requirements, evidential requirements, that need to be
 9 satisfied if we're going to present it to the Crown
 10 Court or the Magistrates Court. That was not something
 11 that was the subject of discussion?
 12 A. No, not that I can recall, no.
 13 Q. Can you remember the Criminal Law Team ever advising on
 14 that issue or being asked to advise on that issue?
 15 A. In their advices they might ask for -- you know, obtain
 16 Horizon data but there was no advice given on how it
 17 should be presented that I can recall.
 18 Q. Can we look, please, at POL00114566 and page 14, please.
 19 We can see a document here dated 6 January 2003.
 20 Maybe if we just skip back to the beginning part of it,
 21 if we just go back and then go forward each page,
 22 please. Keep going, thank you.
 23 You'll see this is a Fujitsu document, a
 24 "Description for Implementation and Maintenance of
 25 Security Policies and Procedures". Then if we go to the

1 were explained to us what was in each column and it was
 2 all fairly common sense stuff, to be honest.
 3 Q. Had you ever heard of Section 69 of the Police and
 4 Criminal Evidence Act and what it required when you were
 5 performing the role of Casework Manager?
 6 A. Section 69? No. It doesn't ring a bell with me, sorry.
 7 Q. Had you ever heard, if not the section and the Act,
 8 anything about what the law required in criminal
 9 proceedings as to the nature and quality of the evidence
 10 produced from a computer?
 11 A. Not that I can recall, no.
 12 Q. When you were performing this role as Casework Manager
 13 from 2002 onwards, as an assistant to start with, were
 14 you aware that there had been a law change, prior to
 15 your taking up the function, that was relevant to that
 16 issue or may have been relevant to that issue; if we're
 17 getting data from a computer, there's certain things
 18 that we have to do alongside that to prove it in
 19 a court?
 20 A. No, I wasn't aware of that.
 21 Q. And that there was a change in the requirements?
 22 A. No, wasn't aware of that.
 23 Q. Were you aware of any law or evidential requirements
 24 concerning the production of computer evidence from 2002
 25 until 2007?

1 fourth page, please. If we see in the third box down
 2 there, "Sue Lowther [Post Office Limited] comments on
 3 version 0.2."
 4 Sue Lowther was a Post Office employee; is that
 5 right?
 6 A. That's correct, yeah.
 7 Q. What function would she have been performing at this
 8 time, December 2002?
 9 A. Looking at the box below, Post Office Information
 10 Security Manager.
 11 Q. So what relation did she have to you?
 12 A. I don't recall meeting Sue.
 13 Q. Was she somebody with whom you were familiar?
 14 A. I was aware of the name, yeah.
 15 Q. It seems that somebody within the Post Office knew about
 16 this document, namely Ms Lowther?
 17 A. Yeah.
 18 Q. If we go back to page 14, please. Can you see that ARQ
 19 is defined in the second definition down, yes?
 20 A. Yes.
 21 Q. Then if we just scroll through, please -- keep going --
 22 you'll see there's a section on Litigation Support, yes?
 23 A. Yes.
 24 Q. Then if we keep going. Then stop there, thank you.
 25 I've not taken you to individual parts of it to see

1 what it described but, in general terms, it sets out the
 2 relationship between Fujitsu, on the one hand, and Post
 3 Office, on the other, in the provision of ARQ, with some
 4 other data, as well, but ARQ data, and Litigation
 5 Support and, in particular, describes some contractual
 6 limits in terms of years and months. But also, the
 7 process that's to be adopted in making requests and the
 8 provision of data.

9 **A.** Yes.

10 **Q.** Was this a document with which you were familiar when
 11 you were performing the function of manager in 2003?

12 **A.** I've certainly seen a document along those lines, yeah.
 13 I mean, whether it's this one or not, but yeah. I would
 14 have had that document to help me understand the volume
 15 of requests, so yeah, I would have been aware of that,
 16 yeah.

17 **Q.** Thank you. Then FUJ00122366. we can see a document
 18 entitled "Management of the Prosecution Support Service
 19 for [ARQs]", dated 6 June 2007, so this is right at the
 20 end of your period as a Casework Manager; is that right?

21 **A.** Yeah, roughly, yeah.

22 **Q.** Just before, I think, you became an AFI?

23 **A.** Yeah, I found my -- one of the certificates for passing
 24 FI, you had to go through various stages of training,
 25 and it was dated December, so my guess is that probably

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1 Then the left-hand side describes what is to be done
 2 in the audit request part of the request.

3 **A.** Yeah.

4 **Q.** Does that describe -- admittedly this isn't a document
 5 addressed to Post Office Limited -- the nature of the
 6 possible forms of information and data the Post Office
 7 could seek from Fujitsu?

8 **A.** I would say, yes, that's my understanding, yeah.

9 **Q.** Were all of them, were each of them, requested in each
 10 case?

11 **A.** Sorry, prosecution support?

12 **Q.** Yes.

13 **A.** Not that I'm aware of, no. So, in terms of the process
 14 for Casework, we would request ARQ data that was asked
 15 for.

16 **Q.** Just stopping there -- sorry to interrupt you -- would,
 17 in each proposed prosecution case, you request ARQ data
 18 in each case?

19 **A.** No.

20 **Q.** Why would you not request ARQ data?

21 **A.** Unless it was asked for.

22 **Q.** Whose decision was it to ask for it?

23 **A.** So it would be -- Legal Services would make the decision
 24 on what evidence was required for the case, so if there
 25 were admissions in a case, then you wouldn't necessarily

75

1 joined around six months earlier, because I worked in
 2 the team and started training. So I would guess it
 3 would be about that time, yeah.

4 **Q.** This seems to be an updated process in mid-2007 relating
 5 to the document that we've just looked at, the processes
 6 described in that. Do you know what prompted or led to
 7 this document being created, this policy being created?

8 **A.** No, I don't, no.

9 **Q.** Can we just look forward to page 21, please, and scroll
 10 down, please. I'm sorry, that's an errant reference.

11 If we go back to the beginning, please, and just
 12 scroll forwards, please. Keep scrolling. Yes, there,
 13 thank you.

14 You'll see, and this is depicted in words elsewhere
 15 in the document, a process described in a graphic in
 16 relation to making out requests --

17 **A.** Yes.

18 **Q.** -- ARQ requests. On the left-hand side, I think,
 19 non-prosecution cases and, on the right-hand, side
 20 prosecution cases. You'll see the steps on the
 21 right-hand side, "Check Horizon System Helpdesk, if
 22 required"; "Check non-polling reports, if required";
 23 "Check appropriate PEAK logs, if required"; "Complete
 24 a witness statement of fact"; "Complete Exhibit Labels";
 25 "Dispatch to Post Office Limited".

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1 need to obtain a witness statement for it.

2 **Q.** You mentioned a lot of issues in that last answer there?

3 **A.** Sorry.

4 **Q.** You said, firstly, Legal Services would decide what
 5 evidence to ask for?

6 **A.** Yeah.

7 **Q.** Legal Services only got involved at the point at which
 8 a request to prosecute was being made?

9 **A.** Yeah.

10 **Q.** Yes? Does it follow that an Investigator would not seek
 11 ARQ data as part of their investigation?

12 **A.** Yeah, for an audit shortage, yeah, absolutely.

13 **Q.** They wouldn't?

14 **A.** They would, yeah.

15 **Q.** Okay. What determined whether or not an Investigator
 16 asked for ARQ data in an audit shortage case?

17 **A.** I would think that, for an audit shortage case, they
 18 would always request ARQ data.

19 **Q.** Why would they always request it?

20 **A.** Because it would be relevant to the case.

21 **Q.** Why would it be relevant to the case?

22 **A.** Because it's an audit -- or it's an audit query of all
 23 events and transactions that have happened at that
 24 office.

25 **Q.** Isn't it enough to show that, on audit, there was

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1 a difference between what Horizon showed on the cash
2 account or some other document, as being needing to be
3 present in the branch, and what the stocktake showed was
4 present in the branch?

5 **A.** That would clarify the audit shortage. The ARQ data
6 would help to clarify the person in the office that
7 prepared the balance that may have undertaken certain
8 transactions, so it would be relevant, I think.

9 **Q.** When you say it would be relevant, are you saying it
10 would be necessary?

11 **A.** Yes, sorry, yeah.

12 **Q.** It would be necessary in all audit shortage cases?

13 **A.** Yeah, I would think so, yeah.

14 **Q.** So you would expect to see an ARQ request in each and
15 every audit shortage case?

16 **A.** If there had been admissions, I'm not sure that the
17 investigator would have thought it necessary at that
18 time to request ARQ data.

19 **Q.** Why?

20 **A.** I don't know, really.

21 **Q.** Okay, we'll move on. You said that it was for Legal
22 Services to decide whether, I think, a witness statement
23 was required. Did I understand you correctly there or
24 not?

25 **A.** No, sorry, that wouldn't be correct, obviously. If --

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1 **A.** Not -- it doesn't ring a bell with me, no.

2 **Q.** Something that had more data on it than was available --
3 than simple ARQ data; were you aware of that?

4 **A.** No.

5 **Q.** Were you aware of something called the event log?

6 **A.** Yeah, I mean, that came as part of the ARQ so the
7 transaction log was all the transactions conducted at
8 the counter. The event log was logging on, logging off,
9 cash declarations and balance results, probably other
10 things, as well, but I know there was two, two logs that
11 came with an ARQ.

12 **Q.** Can we just look, please -- remembering this -- at
13 POL00081910, and look at pages 4 and 5, please. If we
14 can look at them alongside each other, please. Thank
15 you.

16 If we look on the right-hand side first, you'll see
17 an email from Mr Dilley, dated Friday, 15 December to
18 Anne Chambers and you're copied in; can you see that?

19 **A.** Yes, I can.

20 **Q.** "... many thanks to you and Andy Dunks for attending
21 court to give evidence this week which was helpful. The
22 judge has reserved his judgment ... Thanks also to Brian
23 and his team for ... providing information about the
24 Falkirk branch on short notice."

25 Then if we scroll down:

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1 so it's -- having not been an Investigator for quite
2 a long time, I'm struggling as to the actual process
3 that they would have followed, but my sort of instinct
4 would be that, if they had requested Audit Record Query
5 data, so they had the data, they would ask for the
6 witness statement to support it at that time, so that it
7 could be presented to the Criminal Law Team to advise on
8 whether there is, you know, charges to be -- or there's
9 evidence for a prosecution.

10 **Q.** So your understanding was that, if a request for ARQ
11 data was made, it was a necessary corollary of that,
12 a necessary bolt-on to that, that a witness statement
13 had to come with it too?

14 **A.** If it was asked for, yeah. Wouldn't necessarily --
15 I don't know whether -- you know, it's difficult to
16 remember, to be honest. Yeah, I --

17 **Q.** Looking at this flowchart, both sides of it, this
18 doesn't mention the message store, does it, if you look
19 at it?

20 **A.** On the left-hand side "Audit Record Query request", it's
21 got "Generate Message Store".

22 **Q.** So what does that, to your understanding, mean,
23 "Generate Message Store"?

24 **A.** Sorry, I'm not -- I don't know what it means. I'm --

25 **Q.** Were you aware of something called the message store?

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1 "In ... litigation the parties involved have
2 a continuing obligation pursuant to the court rules ..."

3 Then skipping over five or six lines:

4 "I was also recently told that there was a message
5 store which had everything else on it and we invited
6 Mr Castleton to look at it but he didn't take up the
7 opportunity.

8 "... whilst giving evidence you [that's Ms Chambers]
9 told the court there was a different sort of events log,
10 not included on the message store, that we had not seen
11 or disclosed for the Marine Drive branch. Mr Castleton
12 telephoned me today and asked for a copy of this ..."

13 Scrolling down.

14 "... to be supplied ... immediately."

15 Then you can read to the rest of the email.

16 Looking at it generally at the moment -- we'll come
17 back to *Castleton* in a moment -- what was your
18 involvement in the *Castleton* case?

19 **A.** So, yeah, I would have been Casework Manager at that
20 time, so I would have been requesting data on behalf of
21 the Civil Litigation Team that were dealing with it.

22 **Q.** So you would have been the go-between --

23 **A.** Yeah.

24 **Q.** -- between Civil Litigation to your right --

25 **A.** (*The witness nodded*)

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1 Q. -- as it were, and then Fujitsu to your left?
 2 A. Exactly, yeah.
 3 Q. Okay. This speaks of, can you see, the message store
 4 which had "everything else on it". It seems to be
 5 speaking about something in addition to the ARQ data
 6 that was obtained.
 7 A. Yes, it does, yeah.
 8 Q. Do you know what that's referring to there?
 9 A. No, I don't, no.
 10 Q. Were you aware of a message store which had "everything
 11 else on it"?
 12 A. No, I wasn't, no. All I was aware of, through ARQ data,
 13 was we could request transaction logs, event logs, that
 14 were relevant to the transactions that were conducted at
 15 a post office and the events that happened at a post
 16 office, and we could further request Horizon System
 17 Helpdesk calls.
 18 Q. You had previously been an Investigator responsible for
 19 disclosure of material in criminal proceedings before
 20 this, this is December 2005 --
 21 A. Yeah.
 22 Q. -- and you're being told, albeit as a copyee on this
 23 email, that there is another species of data available
 24 in a message store which has been made available to
 25 Mr Castleton, yes?

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1 within the Post Office was "graham.c.ward", so obviously
 2 I'm not going to remember receiving emails from 2006
 3 anyway and, if I was cc'd in, you know, I'd like to
 4 think I would have read it and, if I'd have seen that,
 5 then that would have concerned me greatly, and yeah,
 6 I would have escalated that as an issue. But I just
 7 don't think I picked that up, and whether that was
 8 because I haven't received the email, or whether I just
 9 haven't picked it up, I don't know.
 10 Q. Can we just go up, please, to page 3. So maybe if we
 11 can just display one page at a time now.
 12 Thank you. Just scroll up.
 13 You'll see here, at the foot of the page, that
 14 I think your email address is in a reply to that,
 15 displayed as "graham.c.ward"; that is the correct --
 16 A. Yeah. That is correct, yeah.
 17 Q. So whether this is a function of the way this has been
 18 printed, sometimes the downloading process -- I'm using
 19 very inelegant terms here -- and the printing process
 20 affects the way email addresses appear, or whether
 21 somebody made a mistake in the first email we looked at,
 22 this second email is the correct email address?
 23 A. Yeah.
 24 Q. So you would have got the chain?
 25 A. Yeah.

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1 A. Yes, that's correct, yeah.
 2 Q. Is that knowledge that you took forwards when you were
 3 discharging your role as Casework Manager in criminal
 4 cases?
 5 A. I hadn't picked that up.
 6 Q. What about the different sort of events log which
 7 apparently Ms Chambers had referred to in her evidence?
 8 Was that something you didn't pick up?
 9 A. Yeah, I didn't pick it up, no. Not at all.
 10 Q. So does it follow that, after this time, December 2005,
 11 this wasn't something that you took back to Casework
 12 Management to say, "Hold on, we're processing all these
 13 ARQ requests, there's this other species of data that
 14 somebody at Fujitsu, Anne Chambers, has mentioned as
 15 being important or useful that we're not getting or not
 16 asking for"?
 17 A. No, I've just not picked it up at all. You know, don't
 18 recall seeing this email. Can we just scroll to the
 19 top, where it's got my email address?
 20 Q. Yeah, sure. So right-hand side. That's it.
 21 A. So I mean, I know it's, some of it's --
 22 Q. Redacted.
 23 A. -- redacted, sorry, yeah, but it's got "grahamc.wa.r" --
 24 I don't know whether that's relevant or not but would
 25 I have actually got that email because my email address

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1 Q. So I think we can probably rule out that it didn't come
 2 to you.
 3 A. Okay.
 4 Q. That leaves, I think, that it's not something that you
 5 picked up?
 6 A. Yeah, exactly, yeah.
 7 Q. I think you'd probably agree, in the light of what you
 8 just said, it's quite important, isn't it?
 9 A. Very.
 10 Q. Again, we don't see it reflected in that table of
 11 a couple of years later, that I showed you in Section 7
 12 of the policy --
 13 A. Yeah.
 14 Q. -- as things to look for?
 15 A. Yeah. I would have thought, given that, yes, it appears
 16 to be really important, that this would have been, you
 17 know, escalated by the Civil Litigation Team. They
 18 worked closely with the Criminal Law Team, as well.
 19 I would have thought it would have been escalated as --
 20 you know, as an issue.
 21 Q. You're talking about Mandy Talbot there?
 22 A. Well, Stephen Dilley was the lawyer dealing with it.
 23 Q. Yes, he was in an outsourced firm --
 24 A. Yeah.
 25 Q. -- so he wasn't within Post Office.

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- 1 **A.** Okay, yeah. Well, yeah, I agree it was significant and,
2 yeah, it should have been escalated.
- 3 **Q.** We also know about a note that Anne Chambers herself
4 wrote, which is along the same lines, up to her line
5 management, her reflections document, which picks up
6 this point about the categories of data obtained as
7 a result of the initial request for data. Can you
8 recall any fallout from that coming back to Post Office,
9 saying, "When you ask for data you need to be asking for
10 message store data too"?
- 11 **A.** No, not at all.
- 12 **Q.** Thank you.
13 That can come down. Thank you.
14 You tell us in your witness statement that the
15 Casework Manager acted as the single point of contact as
16 between the Post Office, on the one hand, and Fujitsu,
17 on the other, in relation for requests for, and then the
18 provision of, ARQ data.
- 19 **A.** That's correct, yeah.
- 20 **Q.** Other than the two documents that I've shown you, the
21 2003 and the 2007 document, which are Fujitsu documents,
22 were there any written policies or protocols which you,
23 in the Post Office, followed within the Casework Team
24 concerning requesting ARQ data?
- 25 **A.** Not that I'm aware of, no.

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- 1 managed the system but it was Post Office data. So it
2 always struck me as odd that we had restrictions on it,
3 but that was the contract.
- 4 **Q.** Did you grumble about that?
- 5 **A.** Yeah, I did. I did and I think there was -- I think,
6 you know, my line manager at the time was Tony Utting
7 and we had issues staying within the limits. We didn't
8 refuse many at all. I mean, we always were there or
9 thereabouts. But I did make the point to him we had
10 a lot of requests coming from the Benefits Agency, as
11 they were known then, because of the pension allowance
12 cases we were dealing with, with Fujitsu. When they
13 heard that the evidence that came from Fujitsu included
14 times of transactions which was really, really, really
15 helpful, they started making lots of requests for ARQ
16 data and, at that point, I said to Mr Utting that, you
17 know, we're going to have problems here, and I know he
18 escalated it, and I --
- 19 **Q.** Who, Tony Utting did?
- 20 **A.** Tony Utting escalated it within the business that the
21 limits were restrictive and I know that it was increased
22 at some point. I can't remember the details but I know
23 there was some clause in the contract where we could ask
24 for further ARQ numbers and it was increased but
25 I couldn't tell you the details of, you know, what it

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- 1 **Q.** Did you just do, therefore, what your predecessor had
2 done: follow the custom and practice of him or her?
- 3 **A.** Yeah, I say I think I inherited the process. I can't be
4 absolutely clear because, as I say, it goes back, you
5 know, 22 years, but, yeah, we just basically carried on
6 requesting the data that we thought was important.
- 7 **Q.** You were aware, and I think you remember because it's in
8 your witness statement, contractual limits on the number
9 of ARQ requests you could make to Fujitsu without
10 a separate charge?
- 11 **A.** Yeah.
- 12 **Q.** You recall maintaining a spreadsheet, the purpose of
13 which was to ensure that the Post Office did not exceed
14 these limits; is that right?
- 15 **A.** Yeah, that's correct, yeah.
- 16 **Q.** You tell us in your witness statement that the number of
17 requests made by Post Office was monitored very closely?
- 18 **A.** Yeah.
- 19 **Q.** Why was it monitored very closely?
- 20 **A.** Well, to ensure that we, where we could, not exceed the
21 contractual limits because there were financial
22 penalties, unfortunately. I will say, at this point,
23 that I never quite understood why there was such
24 restrictions on the data coming over to us, why we had
25 a contract with Fujitsu, and I understand Fujitsu

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- 1 went from and to.
- 2 **Q.** So this was when you were Casework Manager, you recall
3 discussing the limitations --
- 4 **A.** Yeah.
- 5 **Q.** -- placed by the contract with your line manager, Tony
6 Utting?
- 7 **A.** Yes.
- 8 **Q.** Why was there a need to raise it with him?
- 9 **A.** Well, any changes to the contract, from my
10 understanding, were going to mean money and it was
11 raised at the level that he worked at. It wasn't at my
12 level.
- 13 **Q.** It's my poor question: why was there a need to raise the
14 issue of the availability of ARQ requests with him,
15 because you needed more than the contract permitted,
16 presumably?
- 17 **A.** Well, exactly, yeah.
- 18 **Q.** You tell us in your witness statement -- no need to turn
19 it up, it's paragraph 49 -- that the contractual limits
20 on ARQ requests were the main consideration that
21 informed the Post Office's decision whether to request
22 ARQ data or not?
- 23 **A.** Mm-hm.
- 24 **Q.** Ought the main consideration to have been whether or not
25 the ARQ data was necessary for the purposes of

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1 an investigation?

2 **A.** Sorry, can you repeat the question?

3 **Q.** Yes. You tell us in your witness statement that the

4 contractual limits on ARQ data were the main

5 consideration that informed the decision whether to ask

6 for ARQ data or not.

7 **A.** Mm.

8 **Q.** Ought the main consideration, instead, have been whether

9 or not the data was necessary for the purposes of

10 an individual case?

11 **A.** Yeah, I would agree.

12 **Q.** So why was the contractual limit the main consideration?

13 **A.** Yeah, it's not very well worded, I would say. For me,

14 as Casework Manager, I would want to be able to provide

15 Horizon data whenever it was asked for, so increasing

16 the contractual limits was, you know, necessary. That

17 was as far as I got involved in it, really.

18 **Q.** Did the knowledge about the contractual limits and the

19 additional financial penalties that might be placed on

20 POL if more requests than were permitted were made

21 trickle down to Investigators?

22 **A.** I wouldn't have thought so, no. I certainly wouldn't

23 have communicated it.

24 **Q.** So they might know that, if the Post Office had reached

25 its allocation for the month or the year, it was going

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1 Horizon, you would have assumed that the Investigation

2 Manager investigating that shortfall would have

3 requested Horizon data?

4 **A.** Yeah.

5 **Q.** In every case, essentially?

6 **A.** Yeah, I would have thought so, yeah.

7 **Q.** Why would you assume that such an Investigation Manager

8 in every case would ask for Horizon data?

9 **A.** Well, just because it's -- it could be used

10 evidentially.

11 **Q.** To do what, to prove or disprove what the subpostmaster

12 was saying?

13 **A.** Yeah, I mean it's -- you know, there could be

14 transactions or things happening on the ARQ data that

15 could be relevant.

16 **Q.** Was there any system of prioritisation of ARQ requests

17 coming from the Security Team over other requests?

18 **A.** I would prioritise Security Team, personally, yeah,

19 absolutely, over --

20 **Q.** Where were the other requests coming from?

21 **A.** Sorry, the other requests would come from Contract

22 Managers, Field -- not Field Support but whoever it was

23 that was investigating any issues at offices. There

24 were various teams that were involved in supporting

25 branches and I presume that everybody within the

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1 to cost Post Office money to ask for data?

2 **A.** It may have trickled down, yeah, it may have trickled

3 down. I mean --

4 **Q.** Was there ever any discussion between the Casework Team

5 and Investigators about whether it was necessary, truly

6 necessary, to seek ARQ data or not?

7 **A.** No. Not insofar as "Don't request it". We might have

8 asked them to really consider the scope because, for me,

9 you know, you want as much Horizon data as you could

10 possibly have but, you know, sometimes you would just

11 ask for, you know, a couple of months when you might

12 want six. So it was restrictive, there's no question

13 about that.

14 **Q.** So you wouldn't go as far as saying "Don't ask" or

15 "Don't bother asking"?

16 **A.** No.

17 **Q.** But you might encourage them to limit the range of their

18 request --

19 **A.** Absolutely, I mean, in the early days we were always

20 quite close to our limits. When the contract was

21 increased, we had a lot more scope, so I don't recall,

22 towards the end of my time in Casework, having to worry

23 about the contractual limits.

24 **Q.** You tell us in your witness statement that, where

25 a postmaster was attributing an alleged shortfall to

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1 business was aware of the ARQ process. So yeah, we

2 would get not many, but you would get *ad hoc* requests

3 from other areas of the business and, as I say, I don't

4 recall having to say "No, you can't have it". It was

5 certainly an issue in the early days but, latterly, it

6 wasn't.

7 **Q.** What kinds of ARQ requests would postmasters and

8 Contract Managers make?

9 **A.** Just per individual transactions, you know, where they

10 thought they had an issue or if a transaction correction

11 had been received at the office and the subpostmaster

12 wanted to dispute that transaction correction, ARQ data

13 would be requested.

14 **Q.** Why did you prioritise Security Team requests over those

15 made by subpostmasters and Contract Managers?

16 **A.** Well, just because of the numbers.

17 **Q.** But why were they more important than the

18 subpostmasters?

19 **A.** Um, that's good question. They're not more important.

20 I mean --

21 **Q.** Why were they prioritised?

22 **A.** They were prioritised because we need -- we may have

23 needed them for prosecution cases.

24 **Q.** Why was it more important to service the requirements of

25 somebody who had, as their function, prosecution over

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1 a subpostmaster that may be querying or disputing
 2 a transaction?
 3 **A.** I guess it wouldn't be really but, as I say --
 4 **Q.** Well, why, was it?
 5 **A.** I don't recall refusing requests, at all.
 6 **Q.** That's a different issue.
 7 **A.** But we would have prioritised -- yeah, I hear what
 8 you're saying but I haven't got an answer for that, I'm
 9 sorry.
 10 **Q.** Was it because it was thought more important to
 11 prosecute subpostmasters than anything else?
 12 **A.** No, I don't think so, not from my perspective.
 13 **Q.** Why were Security Team requests prioritised?
 14 **A.** Well, without the Horizon data, we wouldn't have
 15 potentially been able to continue with an investigation.
 16 **Q.** Can we look, please, at POL00114566, and pages 31 and
 17 32, please. If we can display 31 and 32 at the same
 18 time, please. If we look on the right-hand side and
 19 scroll down, please, and look at your email first at the
 20 foot of the page. Scroll a bit further, on the
 21 right-hand side, your email of 22 July 2004 to
 22 Mr Utting, "Horizon data requests", yeah?
 23 **A.** Yeah.
 24 **Q.** "This year we have submitted the following", and you set
 25 out the monthly figures for the, I think, eight months

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1 a bit of trickle down, doesn't it?
 2 **A.** Yes, it does.
 3 **Q.** Looking at that sentence now, do you think in fact there
 4 had been some trickle down: because people on the ground
 5 who were conducting the investigations knew about the
 6 contractual restrictions on the provision of ARQ data,
 7 they didn't bother asking for them?
 8 **A.** Yeah, I would have to agree, yeah.
 9 **Q.** "If we had greater access, I am sure once the 'word' got
 10 around we would use up whatever was available.
 11 "... with a monthly limit of 46 I didn't have to
 12 turn [any] away ..."
 13 You said that in your witness statement and you said
 14 that today.
 15 **A.** Mm.
 16 **Q.** "... so I would get that having 50 per month for the
 17 rest of this year would see us through until the
 18 contract is amended. Therefore my guesstimate for the
 19 remaining year ... would be 220 ..."
 20 You explain why.
 21 Essentially, you were saying that, because of the
 22 arrangements that had been agreed as a matter of
 23 contract between Post Office and Fujitsu, people in
 24 other teams, including Security, weren't asking for ARQ
 25 data because they knew it wouldn't be given.

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1 that have then elapsed?
 2 **A.** Mm-hm.
 3 **Q.** "Total 330 (our annual limit)."
 4 Can you see that?
 5 **A.** Yes, I can, yeah.
 6 **Q.** Were you saying by that that you'd reached your annual
 7 limit?
 8 **A.** That would appear to be the case, yeah.
 9 **Q.** By August?
 10 **A.** Yeah.
 11 **Q.** If we scroll on a little further on the right-hand side.
 12 If we can scroll up on the left-hand side, please.
 13 Let's just display this as one document, rather than
 14 try to be flash and display two at the same time. Thank
 15 you.
 16 Then scroll down.
 17 Yes, it does just begin "predicting". I was unsure
 18 whether we were missing some text because you didn't
 19 start the sentence with a capital P:
 20 "[Predicting] how many we will want isn't
 21 straightforward as people in our own team/[Retail Line
 22 Managers]NBSC/Legal Services are aware of the
 23 problems/restrictions in obtaining these logs and thus
 24 don't bother asking for them."
 25 Just on that sentence, that does tend to indicate

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1 **A.** Yeah, that's why we raised it as a real issue and that's
 2 thankfully why we got the limits increased, as I said.
 3 **Q.** So you saw the position needed to be put right?
 4 **A.** Yeah, absolutely.
 5 **Q.** That was not just by increasing the limit but by also
 6 encouraging people to ask for data whenever they wanted
 7 it; is that right?
 8 **A.** No, I wasn't encouraging people to ask for it whenever
 9 they wanted it but I wanted to be able to provide data
 10 when people asked for it.
 11 **Q.** Was anything done to correct the attitude of mind that's
 12 described in the first paragraph there: investigators
 13 and others not asking for it, don't bother asking,
 14 because of knowledge of restrictions?
 15 **A.** Not that I can recall, no.
 16 **Q.** Can we go on to page 37 and 38. Start on page 38,
 17 please, so from Tony Utting. Then scroll up, please,
 18 and keep going. Can we see at the top here Mr Utting
 19 forwarding this chain to you and others --
 20 **A.** Yeah.
 21 **Q.** -- in June 2004?
 22 **A.** Yeah.
 23 **Q.** "... there are reams of emails about this (as you can
 24 imagine) ..."
 25 Let's just look at what this part of the ream said,

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1 if we scroll down. Keep going.
2 Well, Mr Utting is forwarding you an email, in which
3 he says:

4 "I have today spoken with Keith Baines the Client
5 Manager for Fujitsu, who tells me that the proposed
6 reduction in requests has been agreed at EC level ..."

7 I think that might be Executive Committee level?

8 **A.** Mm-hm.

9 **Q.** "... and that the business is aware, that should we
10 exceed the number of requests in the contract, further
11 resources will have to be found by the business to pay
12 for them.

13 "The rationale behind the decision was that it was
14 felt that we should not pay for anything in the contract
15 that we did not use and there was no certainty that we
16 would reach the previously agreed numbers."

17 Do you read this as suggesting there had, in fact,
18 been a previous reduction in numbers through a fear that
19 capacity would not be used up?

20 **A.** Yeah, that's how it reads, but that wouldn't have been
21 my recollection at all because we'd always, at the time
22 I was doing it, we'd always got very, very close to the
23 limits and, you know, that's why it was increased.

24 **Q.** So if we scroll up, please, we can see David Miller, can
25 you remember who he was at this point?

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1 **A.** Not always, no. I mean, it was increased to -- was it
2 720? I think it went up quite considerably.

3 **Q.** "With the introduction of banking and the proposal to
4 remove the hard copy cash account facility ... every
5 investigation, whether full or preliminary, may require
6 access to data held by Fujitsu.

7 "I was surprised that such a change was made without
8 any reference to the primary stakeholder. Providing
9 I have your commitment that [the Post Office] will meet
10 any additional costs which may be caused as a result of
11 this decision ... I am comfortable if this has
12 contributed to the reduction in the overall Fujitsu
13 contract costs."

14 Were you included in any of this prior discussion?

15 **A.** Not that I can recall, no. I mean, it's way above my
16 pay grade.

17 **Q.** Did you hear about the fallout from it, ie a decision
18 seemingly having been made without your line manager or
19 his line manager, Mr Marsh, being included in the
20 discussion?

21 **A.** No, I don't recall.

22 **Q.** If we go up, please. Stop there. He's forwarding you,
23 Mr Utting, this chain. What was the purpose of that, do
24 you know? Is it simply to tell you, "Look, this has
25 been going on at the higher levels of the organisation,

99

1 **A.** Yeah, he was in -- I think he was one of the senior
2 directors, was he?

3 **Q.** An email to him from Mr Marsh:

4 "This refers to the reduction, without any prior
5 reference to anyone in my team, of the number of
6 pre-paid audit and investigation information requests
7 agreed in the contract from 500 to 330."

8 Remember that 330 number is the number that you had
9 said, in your email that we just looked at, was the
10 limit for the year.

11 **A.** Mm.

12 **Q.** Were you aware of a previous reduction from 500 to 330?

13 **A.** No, I wasn't, no.

14 **Q.** "I had previously agreed with Mike Hannon that our
15 original figure of 750 (itself reduced from a rather
16 comfortable 1,000) could be reduced to 500 provided that
17 our bid for funding to cover any additional requests
18 would be met."

19 Were you aware of any of those steps, an original
20 comfortable 1,000 a year, itself reduced to 750, itself
21 reduced to 500, itself reduced to 330?

22 **A.** No, I wasn't aware, no.

23 **Q.** When you were the Casework Manager, the single point of
24 contact for making these requests, did you always work
25 on the basis that your annual limit was 330?

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1 we just deal with the consequences", kind of thing?

2 **A.** Yeah, it would appear so, yeah.

3 **Q.** Thank you. Can we move on, please, to page 44 of this
4 bundle. If we scroll down, please -- thank you -- we
5 can see an email of 1 June 2004 from you to Keith
6 Baines, copied to Dave Pardoe and Mr Utting.

7 **A.** Yes.

8 **Q.** At this time, mid-2004, what role was Mr Baines
9 performing?

10 **A.** He must have been a Fujitsu relationship manager or
11 something along those lines, I really don't remember.

12 **Q.** Was he a senior person --

13 **A.** Yeah, well, I --

14 **Q.** -- within the Post Office?

15 **A.** From my understanding, yeah, he was, yeah.

16 **Q.** You say:

17 "Please see the email from Bill Mitchell, Fujitsu
18 Security Manager ... some of the transaction log
19 requests we have submitted have been returned
20 'incomplete' due to human error on their part. This
21 could invite some criticism from Defence counsel in
22 cases where the logs have been used have been used in
23 evidence. Fujitsu armies thing 'complete' data with
24 a supporting statement, so hopefully the issue will not
25 be a great problem.

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1 "[Forwarded for information and] action you deem
2 appropriate from a commercial/contractual perspective."
3 Can you recall what the issue was with incomplete
4 transaction and event logs that you're describing here?
5 **A.** No, without reference to the email chain I was sent --
6 **Q.** If we go down, I think we'll see it.
7 **A.** -- yeah, I wouldn't have remembered any of this at all.
8 **Q.** If we just keep going, that is the email from Bill
9 Mitchell.
10 **A.** Yeah.
11 **Q.** In summary, does this help, in evidence that had been
12 submitted in court proceedings, had incomplete ARQ data
13 been provided by Fujitsu?
14 **A.** Yeah.
15 **Q.** Just going back up, you were telling Keith Baines about
16 this. Was he somebody that you liaised with often?
17 **A.** No.
18 **Q.** Why were you bringing in Mr Baines?
19 **A.** Well, I presume because he managed the relationship with
20 Fujitsu, so he needed to be made aware of what had
21 happened.
22 **Q.** Do you know whether anyone else within senior
23 management, ie at his level, was informed about the
24 failure to provide complete ARQ data?
25 **A.** Yeah, I'm not aware of what level of seniority Keith
101

1 ARQ data and the increase in limits of ARQ data?
2 **A.** No idea at all, no.
3 **MR BEER:** Sir, we're about to move to a new topic. It is
4 just coming up to 12.55 now. I wonder whether you will
5 consider adjourning until 1.55.
6 **SIR WYN WILLIAMS:** Yes, I'd even consider adjourning until
7 2.00, unless you tell me those five minutes are crucial.
8 **MR BEER:** Well, five minutes lost now is five minutes at the
9 end of the day, sir.
10 **SIR WYN WILLIAMS:** All right, 1.55.
11 **MR BEER:** Thank you, sir.
12 (12.53 pm)
13 (The Short Adjourning)
14 (1.55 pm)
15 **MR BEER:** Good afternoon, sir. Can you see and hear us?
16 **SIR WYN WILLIAMS:** Yes, thank you.
17 **MR BEER:** Yes, thank you. Good afternoon, Mr Ward. Can we
18 pick up the topic of litigation support, please. In
19 paragraph 42 of your statement you told us that your
20 understanding was, if ARQ data was required, it would be
21 supplied in accordance with the contract and that, if
22 a supporting witness statement was needed, this would
23 also be supplied in accordance with the contract, and
24 would be dealt with on a case-by-case basis; is that
25 right?
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1 Baines was at. He might have been the same level as
2 Tony Utting, I don't know.
3 **Q.** You say that they, Fujitsu, are:
4 "... submitting complete data with a supporting
5 statement, so hopefully the issue will not be it a great
6 problem."
7 Can you recall whether any action was taken in
8 relation to past cases to check whether what had
9 occurred here, the submission of incomplete ARQ data,
10 had afflicted them too?
11 **A.** No. I mean, I think this was raised by Fujitsu.
12 I think they brought it to our attention. So they had
13 obviously made a mistake. So, no, I don't recall that
14 there was any further action taken.
15 **Q.** Can you recall whether there was any review undertaken
16 of cases in which a conviction had been obtained,
17 whether by plea or after a trial, in which ARQ data had
18 featured, to see whether, before this time, mid-2004,
19 the ARQ data was complete?
20 **A.** I can't recall, no.
21 **Q.** This email is within a folder, a physical folder, which
22 has got, on its front sheet information -- if we go to
23 page 1, we'll see it -- "[ARQ requests] (Increase in
24 Limits)". Do you know what the relationship was, the
25 connection was, between the failure to provide complete
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1 **A.** That's correct.
2 **Q.** If we just look at the paragraph 56 of your statement,
3 please, which is on page 20, if that could be brought
4 up.
5 Page 20, paragraph 56, second from the top. You say
6 in the second sentence:
7 "As Casework Manager, I had little involvement with
8 prosecution witnesses, aside from liaising with
9 Fujitsu's Prosecution Support Team."
10 Is that right?
11 **A.** That's correct, yeah.
12 **Q.** So you weren't involved in or interested in the
13 substance of what the prosecution witnesses were
14 saying --
15 **A.** No.
16 **Q.** -- irrespective of whether they came from Fujitsu or
17 otherwise?
18 **A.** Correct.
19 **Q.** Can we look, please, at FUJ00122197. If we scroll down,
20 please.
21 We can see, if we just scroll to the bottom, please,
22 the start of an email chain, not involving you -- if we
23 scroll up -- not involving you, yes? Then scroll up.
24 Can we go to the end of the email chain, please, and
25 scroll up. Thank you. If we just take the top of the
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1 email, which is on the next page, from you; can you see
 2 that?
 3 **A.** Yeah.
 4 **Q.** Subject of ARQ requests, dated March 2006, and scroll
 5 down. You say:
 6 "All
 7 "... sorry for the length of this email and the high
 8 volume of requests attached."
 9 If we scroll up again to see who the "All" was. Can
 10 you see under the "To" section, it simply says,
 11 "Fujitsu"?
 12 **A.** Yes.
 13 **Q.** Was that a group email address?
 14 **A.** It was, yeah.
 15 **Q.** Can you now remember who was within it or not?
 16 **A.** So 2006, I would guess it would be Neneh Lowther, Pete
 17 Sewell, maybe Penny Thomas, maybe Andy Dunks.
 18 **Q.** Okay, thank you. Scroll back down to the substance,
 19 then:
 20 "Both of the above requests relate to cases where
 21 [the Post Office] are being challenged about the
 22 accuracy of the Horizon system."
 23 You're already aware of the case at Torquay Road and
 24 have provided data:
 25 "... In the cases of Marine Drive and Torquay Road

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1 **Q.** Can you keep your voice up a little bit please?
 2 **A.** Sorry. In terms of cases in Security, there weren't any
 3 Horizon -- many Horizon cases that I was aware of.
 4 **Q.** Any or many?
 5 **A.** Well, going back to 2006, I can't recall exactly now,
 6 but I don't think there were any. Obviously, I was --
 7 **Q.** I'll come back to that answer in a moment but why does
 8 the fact that there weren't any or many challenges
 9 nonetheless mean that it's in your mutual interest to
 10 prove any challenges as being wrong?
 11 **A.** I agree, it's a poor choice of words.
 12 **Q.** Is it a poor choice of words --
 13 **A.** Yeah, it absolutely --
 14 **Q.** -- ie you meant something else but you've expressed
 15 yourself badly?
 16 **A.** I've expressed myself badly, I --
 17 **Q.** Hold on. Let me finish the question, Mr Ward. "Poor
 18 choice of words" means that you didn't intend what the
 19 words mean: you intended something else but you've
 20 expressed yourself badly by the words you've selected;
 21 is that what you mean?
 22 **A.** I've expressed myself badly.
 23 **Q.** What did you mean?
 24 **A.** Well, I just wanted to do the right thing by ensuring
 25 that we were able to show that the system was working

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1 for which you have previously provided ... responses,
 2 I would like to 'sound out' the possibility of someone
 3 at Fujitsu providing a formal witness statement along
 4 the lines of [the attached] provided by Bill Mitchell in
 5 one of our criminal cases (whilst Marine Drive and
 6 Torquay Road are not criminal matters, given the
 7 allegations being made by postmasters, I'm sure you'll
 8 agree that it is very much in both ourselves and
 9 Fujitsu's interests to challenge the allegations and
 10 provide evidence that the system is not to blame for the
 11 losses [provided]). Whilst it may not be a statement
 12 that you, Penny or Neneh can provide, I'm sure there
 13 must be someone who can."
 14 Just stopping there, what were the mutual interests
 15 of the Post Office and Fujitsu that you were referring
 16 to?
 17 **A.** To prove that the Horizon system was working correctly.
 18 **Q.** Why was it in your interests to prove that the system
 19 was working correctly and that the subpostmasters were
 20 wrongly blaming it for losses?
 21 **A.** Well, I can see now, with the benefit of hindsight, that
 22 it was a very one-sided view. At the time, certainly in
 23 the Security Team in terms of criminal cases, there
 24 weren't any cases, Horizon integrity challenges or
 25 whatever.

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1 correctly.
 2 **Q.** Would you agree that it would have been in Fujitsu's
 3 interests to show that the system was working correctly
 4 and not producing unreliable data?
 5 **A.** Yeah, I guess so, yeah.
 6 **Q.** As the manufacturer and operator and system maintenance
 7 company, that would be very much in their interests?
 8 **A.** Yeah.
 9 **Q.** And, corporately, for the Post Office, it would be
 10 important to show that the system that was being used up
 11 and down the country had integrity and was working
 12 properly, wouldn't it?
 13 **A.** I wasn't thinking like that at all.
 14 **Q.** Would you agree that that would be a corporate view
 15 which Post Office senior management would doubtless
 16 hold --
 17 **A.** Yeah, I would agree, yeah.
 18 **Q.** -- not least because, I think you'd probably be aware,
 19 that the proper functioning and integrity of the system
 20 was viewed as essential to the continuation of a number
 21 of sub post offices around the country?
 22 **A.** Yeah, I would agree, yeah.
 23 **Q.** But as the person responsible within a team for bringing
 24 people to justice, is that your principal concern?
 25 **A.** No, my principal concern was to ensure that we were

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1 asking Fujitsu to provide us with a witness statement
2 and provide us with the evidence that the system
3 couldn't be responsible for losses. Again, it's a poor
4 choice of words, I know, but that was the view I had at
5 the time.

6 **Q.** Well, that's a different thing, whether you held a view
7 at the time, which is different from one you hold now,
8 in the light of what you now know. That's different
9 from using words poorly.

10 **A.** Okay.

11 **Q.** Were you using words poorly or does this, in fact,
12 reflect your state of mind at the time?

13 **A.** I don't believe it reflects my state of mind. I was
14 just trying to do the right thing but, you know, I've
15 got it wrong, haven't I?

16 **Q.** Well, the right thing, would you agree, Mr Ward, would
17 be to say, "Although it might be in Fujitsu's interests
18 to refute challenges and allegations about the system
19 and it might be in Post Office's corporate favour or
20 benefit to adopt the same approach, we're here as
21 Investigators, or people who assist in an investigation,
22 and we've got separate duties that we owe under the law
23 and to the court, properly and fairly to investigate"?

24 **A.** Yeah, I can't disagree with that.

25 **Q.** What you've written is the opposite of that, isn't it?

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1 witnesses might say, aren't you?

2 **A.** I don't know why I got involved in this. I think it was
3 because Neneh Lowther had asked me and I was trying to
4 be helpful. It's not -- it wasn't the function of the
5 Casework Manager to get involved in this way.

6 **Q.** Why did you get involved?

7 **A.** Because I was asked and I tried to be helpful.

8 **Q.** Asked by who?

9 **A.** I think Neneh Lowther in the email has -- I saw
10 somewhere in the email chain that Neneh had sent me
11 a statement, asking me to review it. Maybe she'd phoned
12 me previously, I don't know.

13 **Q.** You explain in the last sentence of that big paragraph
14 there, the one that starts "Brian", "it may not be
15 a statement that you, Penny or Neneh can provide",
16 you're sure that there must be somebody who can. Was
17 that because you understood that such a statement needed
18 to be authored by a person who could consider underlying
19 data and properly analyse it?

20 **A.** No, it was because Penny and Neneh only provided basic
21 statements and, because this was relating to banking
22 transactions and nil transactions, I just assumed, maybe
23 wrongly, that it would have been outside their
24 knowledge, and I was aware, obviously, that Mr Jenkins
25 had provided us a more detailed statement in the

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1 **A.** Yeah.

2 **Q.** You say in your witness statement, when we asked you to
3 address this, that you suspect your concern at the words
4 "system failure" would have been that it would have
5 required a detailed explanation in a witness statement?

6 **A.** Yeah.

7 **Q.** Why would that have been a bad thing to have to explain
8 what a system failure was?

9 **A.** Well, I just think, you know -- and I've reflected on
10 this an awful lot -- I just think what I was really
11 looking at was getting a full explanation of what
12 Mr Jenkins was saying in his statement what a system
13 failure was, because it didn't appear to me to be
14 terribly clear. So I would -- you know, I would not
15 have said anything along the lines of "You can't say
16 this", or whatever.

17 I was just trying to get some clarity and
18 I appreciate how it looks now and I'm sorry it looks
19 that way now but, you know, it was not my intention for
20 that to happen in terms of removing the words "system
21 failure", or whatever. I just wanted it to be clear and
22 make sure it was explained properly.

23 **Q.** You told us in your witness statement that you had
24 little involvement with prosecution witnesses. Here
25 you're making a suggestion as to what prosecution

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1 *Castleton* case so I just assumed, maybe, that it, you
2 know, somebody else within the team might have needed to
3 have made that statement.

4 **Q.** Sorry, you said that you were aware that Mr Jenkins had
5 provided a statement in the *Castleton* case?

6 **A.** Yeah.

7 **Q.** Were you aware that it wasn't used?

8 **A.** No, I wasn't aware, no.

9 **Q.** Okay that can come down. Thank you.

10 Can we look at your witness statement, please,
11 page 34, paragraph 112:

12 "Paragraph 90 of the Request [that's our request to
13 you] asks me if I had or was aware of any concerns
14 regarding the robustness of the Horizon system during
15 the time I worked for [the Post Office]. I will say
16 that at no time was I ever aware that the Horizon system
17 had bugs, errors and defects that could have affected
18 balancing at a branch. As with any computer system,
19 I was aware of minor issues, such as ... monitors
20 freezing and terminals having to be rebooted."

21 Then you address the system failures issue, which
22 I'm going to come back to.

23 So at no time, in all of your service right up until
24 May 2016, were you aware that the system had any bugs,
25 errors or defects that could affect balancing, correct?

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1 A. Obviously, there was an article at some point, I can't
 2 remember exactly what year. I mean, I can't remember
 3 what year it was it came out --
 4 Q. Which publication are you referring to?
 5 A. Was it -- I don't -- I can't remember which one.
 6 Q. Are you thinking about Computer Weekly in May 2009?
 7 A. No, I think it was later than that. I don't know, it
 8 was in the media, and I know it's obviously been in the
 9 media a lot. So no.
 10 Q. Other than that article, until you left in 2016, not
 11 aware of bugs, errors or defects that could have
 12 affected balancing at a branch?
 13 A. No.
 14 Q. Everything else was about freezing monitors or reboots
 15 of terminals, or something like that?
 16 A. Well, just -- yeah, I mean, there isn't a computer I've
 17 used that hasn't had an issue, you know, rebooting or
 18 whatever. I just didn't consider system failures at all
 19 as being a serious issue, such as a bug, an error,
 20 a defect.
 21 Q. Thank you. Can we look at POL00119895, please. Can you
 22 see this is a record of a meeting held at Coton House in
 23 Rugby on 6 December 2005 and you're listed amongst those
 24 being present. By this time, you were the Investigation
 25 Team Casework Manager, correct?

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1 cases that I was aware of at all, at this point. I was
 2 attending the meeting, I presume, on behalf of Tony
 3 Utting.
 4 Q. Just going up the page again to the cast list, looking
 5 back at it now, was this the kind of thing you went to
 6 regularly --
 7 A. No, not at all.
 8 Q. -- a meeting at Coton House in Rugby --
 9 A. No.
 10 Q. -- with a group of people relatively senior like that?
 11 A. No, it wasn't, no.
 12 Q. Looking at that cast list and the location of the
 13 meeting, about Horizon integrity and that first
 14 paragraph, doesn't it look like it's a meeting called
 15 because there were concerns about Horizon integrity?
 16 A. Yeah, it does, yeah.
 17 Q. Go back to paragraph 1, please. So it looks like the
 18 result of the meeting was a conclusion that there wasn't
 19 a process for identifying cases in which integrity of
 20 Horizon accounting information might an issue. Would
 21 you agree that if it was -- and we'll see in a moment at
 22 the rest of the minutes of the meeting it suggested that
 23 such a process be designed.

24 Given that that was the focus of the meeting and the
 25 outcome of it, does that tend to suggest to you that, by

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1 A. Correct.
 2 Q. You can see the others present, Mr Baines, Ms Cockett
 3 Mr Gallagher, Dave Hulbert, Mr Legg, Ms Robson and Alvin
 4 West.
 5 A. Yes.
 6 Q. If we go forwards, further down the page, please --
 7 "Flip charts from the meeting" -- "Findings":
 8 "There is no generally understood process for
 9 identifying emerging cases in which the integrity of
 10 accounting information produced by Horizon may become
 11 an issue."
 12 Do you remember, in December 2005, attending
 13 a meeting in which the integrity of accounting
 14 information produced by Horizon was discussed?
 15 A. No, I don't remember the meeting at all but, obviously,
 16 I was there.
 17 Q. This is very early on in the piece, isn't it --
 18 A. Yeah.
 19 Q. -- December 2005? Can you help us now as to why, if you
 20 were not aware of any bugs, errors or defects that might
 21 affect financial information, ie accounting, you were
 22 attending a meeting in December 2005 which addressed the
 23 process for identifying cases where the integrity of
 24 accounting information was in issue?

25 A. No, I can't explain that at all. There weren't many

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1 this time, December 2005, the Post Office knew there was
 2 an issue about the integrity of Horizon information?
 3 A. There were challenges but, you know, from my own
 4 personal point of view, I didn't see that there were
 5 any, you know, serious issues with the actual integrity
 6 of the data.
 7 Q. Why would there need to be a process then? Surely, if
 8 your state of mind was the right one, you'd say, "Hold
 9 on, why are we bothering with all this? Why have we got
 10 to go to Rugby and discuss this? Why are we going to
 11 design a process? All we'll need to do is ask Fujitsu
 12 and they'll tell us everything is all right"?
 13 A. Yeah. Well, I think it was just about coming up with
 14 a process --
 15 Q. Why does there need to be a process if there's not
 16 a problem?
 17 A. Well, because I can only assume that they were expecting
 18 other challenges to come.
 19 Q. Okay, we'll continue:

20 "There are a number of channels by which such cases
 21 may enter Post Office ... and there's no process for
 22 making information about them available to all relevant
 23 functions. This increases the risk that different parts
 24 of the business may be dealing with the same issue and
 25 not coordinate responses.

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

9 "[The] price for providing the data and for skilled
10 resource to analyse and report on it is high ...
11 capacity provided in the contract is fully used [we've
12 looked at that already].

13 "To date, the number of cases in which the integrity
14 of Horizon data has been an issue is small; however,
15 recent correspondence in The SubPostmaster may well
16 cause an increase; also there may be an effect from the
17 introduction of transaction corrections replacing error
18 notices.

19 "The [Federation] has had no involvement to date,
20 and this is expected to continue unless there was
21 considerable momentum for a change ... from membership.

22 "Challenges ... may arise late in the process ...
23 following suspension or issue of a late account ..."

24 Further down the page:

25 "If all potential cases were to require Horizon data
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1 may mean in some circumstances an independent expert
2 would need to repeat analysis for himself that Post
3 Office or Fujitsu had already carried out.

4 "The [Marine Drive] case, scheduled for 7 February
5 is the first of the current cases that may require
6 expert testimony ...

7 "Recommendations

8 "A coordination role should be established to maintain
9 a list of all current civil cases and potential civil
10 cases where accuracy of Horizon accounting information
11 may be an issue ... and ensure that all relevant
12 business functions are made aware of these cases.

13 "2. Briefing is required [for contract managers and
14 service managers] all staff [as well] setting out
15 business policy, lines to take and ... identify
16 potential emerging cases.

17 "3. Data ... is adequate ... However, the
18 capability to analyse ... such data is not available to
19 [Post Office]. Additional cost will be required."

20 Over the page:

21 "On balance ... probably best to provide this
22 resource in-house ...

23 "Appointing an external expert is likely to give the
24 best results in court ... discussions with Fujitsu
25 should be initiated on the role, [Terms of Reference]

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1 to be analysed early in the process ... workload would
2 be considerable -- and much would later prove
3 unnecessary ... there are ... 12 suspensions a week ...
4 Most of these [cases] are subsequently settled by
5 agreement, or are not contested.

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

11 "For [general] evidence will need to be in the form
12 of a credible expert opinion that confirms the system
13 has been designed, built and operated in accordance with
14 good practice and its overall performance provides
15 confidence ...

16 "On the specific errors claimed to have been caused
17 in a particular case, evidence will need to show ...
18 that the system recorded transactions and calculated
19 accounts accurately; and that the transaction data is
20 an accurate record ..."

21 13:

22 "Such evidence will be given greater weight by
23 a court if it is provided by an expert who is distanced
24 from Post Office and Fujitsu. Evidence will need to be
25 given by the person who carried out the analysis -- this
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1 and access to Fujitsu staff ..."

2 We can ignore 5. Then some actions, none of which
3 relate to you. Okay.

4 Just scrolling back, please, to 3 -- or to 1, in
5 fact, coordination role. Was that done?

6 **A.** Not that I'm aware. I mean, as I say, I think I would
7 have been there, just covering for Tony Utting, so
8 I would have just updated him with what happened at the
9 meeting and he would have presumably got a copy of this.
10 And I don't remember being involved in anything after
11 that.

12 **Q.** If something was done to carry recommendation 1 into
13 effect, that's something you would know about --

14 **A.** I would think so.

15 **Q.** -- after December 2005 as having happened?

16 **A.** Yeah, I would have thought so.

17 **Q.** It's something that would have engaged well, it would
18 either have occurred in your branch, in your team --

19 **A.** Yeah.

20 **Q.** -- or it would have been something that required
21 somebody within your branch, in your team to provide
22 data to?

23 **A.** Yeah.

24 **Q.** Can we take it from the fact that you do not know about
25 it, that it didn't happen?

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1 A. Not that I'm aware of. I can't say it didn't happen,
2 but I certainly don't have any knowledge of that.

3 Q. If there was no problem with Horizon, if it was about
4 frozen screens and keyboards not working, why was it
5 necessary to establish a centralised coordination role?

6 A. No idea.

7 Q. Why wouldn't you have piped up at the meeting and said,
8 "Hold on, this is all about monitors freezing and F1 not
9 working on the keyboard"?

10 A. I don't know.

11 Q. Is it because you, in fact, know that there was
12 something more deep seated --

13 A. No.

14 Q. -- about Horizon integrity and the data that it
15 produced?

16 A. Absolutely not, no.

17 Q. You agree that these minutes of this meeting tend to
18 suggest that?

19 A. Well, I don't know if they suggest -- I wouldn't
20 interpret it that they suggest that the system is
21 inaccurate because of bugs, errors and defects, and it
22 could affect the balancing, no. I think the meeting was
23 about Horizon integrity.

24 Q. What's the difference between Horizon integrity and --

25 A. The challenges that were being -- that the business was

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1 Q. -- and was treated as an expert or a person with
2 expertise?

3 A. Yeah.

4 Q. Did you ever raise an issue "Hold on, I went to a quite
5 high-powered meeting in Rugby, where it was agreed that
6 we can't use somebody from Fujitsu or Post Office, they
7 needed to be independent, there was discussion about
8 using our external auditors and whether even that was
9 independent enough. Why are we using somebody from
10 Fujitsu?"

11 A. Yeah, I mean, in terms of Mr Jenkins, I didn't see him
12 as an expert witness myself. I don't recall, you know,
13 seeing him as an expert witness. I saw references to
14 him as a distinguished engineer. And the statement
15 that, you know, we'll come on to, it was just a case of
16 asking somebody, or Fujitsu, to provide a more detailed
17 statement than the basic statement. It was specific
18 requirement and I think Fujitsu identified Mr Jenkins as
19 somebody who could provide that statement.

20 Q. But, even if you didn't view him as an expert, why not
21 pipe up and say, "Well, hold on, we've had this
22 discussion. A meeting is being convened where various
23 parts of the business have been pulled together and
24 a strategy has been developed. Never mind all of the
25 other things in the recommendations that haven't been

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1 receiving from subpostmasters.

2 Q. So are you drawing a distinction there between there's
3 going to be an increase in challenges because of this
4 article in a magazine?

5 A. I say, I can't recall what I'd have been thinking
6 back -- at this time but that's possible.

7 Q. To your knowledge did recommendation 2 get carried into
8 effect: briefing, setting out lines to take?

9 A. I didn't have -- I don't recall receiving any feedback
10 at all from this meeting apart from, obviously that --
11 these minutes. So that would be the same for all the
12 recommendations.

13 Q. Well, over the page, please, at 4: Appointing an expert;
14 the expert will need to testify; such an expert may be
15 needed in the *Castleton* case; advice from Corbett on the
16 desirability of using our external auditors.

17 Remember the discussion earlier in the minute,
18 reflecting the meeting that the expert needed to be
19 somebody outside of Post Office and Fujitsu.

20 A. Mm.

21 Q. Did that recommendation get carried into effect?

22 A. Not that I'm aware of.

23 Q. You know, subsequently, that Mr Jenkins started
24 providing witness statements --

25 A. Yeah.

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1 done, one of them, we sat down and talked and agreed we
2 can't use somebody from Fujitsu or the Post Office; why
3 are we doing that?"

4 A. Honestly, I've got no recollection of this meeting at
5 all. I'm sorry.

6 Q. Go back to page 1, please. You said that you were
7 deputising, you think, from Mr Utting?

8 A. I think so.

9 Q. You would have got a minute -- a note of this minute
10 after the meeting?

11 A. Yeah.

12 Q. Would Mr Utting have got one directly?

13 A. Well, if I forwarded it on to him, yeah.

14 Q. Why would you forward it on to him rather than you deal
15 with the issues that were raised in it yourself?

16 A. Well, I can only assume that I -- as I say, I believe
17 I was there covering for him.

18 Q. So it would be because you were covering for him?

19 A. Yeah.

20 Q. Do you agree that this is a record of you being aware of
21 challenges to the Horizon system's integrity and the
22 financial information that it produced as early as
23 December 2005?

24 A. I was aware of it being a meeting involving challenges
25 to the Horizon system, yes, but I didn't consider them

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1 to be affecting the integrity of the balancing and the
 2 data on the system.
 3 **Q.** Why does it matter then? Why does --
 4 **A.** Because --
 5 **Q.** -- Horizon integrity matter if it doesn't affect any of
 6 the financial data?
 7 **A.** Because any issues on Horizon would matter.
 8 **Q.** What, irrelevant issues that have no cause and effect?
 9 **A.** Well, I wouldn't say they were irrelevant.
 10 **Q.** So what were the relevant Horizon integrity issues if
 11 they weren't to do with accounting?
 12 **A.** Well, it was just to do with the system operating
 13 correctly.
 14 **Q.** What does that mean, please, Mr Ward? You know, don't
 15 you, that this was about the accounting information that
 16 the system produced?
 17 **A.** No, I don't.
 18 **Q.** Go to paragraph 1, please, "emerging cases in which the
 19 integrity of accounting information"?
 20 **A.** For me, it was about the challenges that we were facing,
 21 not the actual system itself being incorrect.
 22 **Q.** Can we move on, please, to another aspect of what
 23 I might call an attitude of mind. You tell us in your
 24 witness statement -- and this is paragraph 22 of your
 25 witness statement, no need to display it -- that in 2012
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1 **Q.** What connection did you make between the two events?
 2 **A.** Horizon cases.
 3 **Q.** Ie they were investigating the integrity of Horizon?
 4 **A.** We were never formally told that, as far as I was aware,
 5 but they were investigating Horizon cases.
 6 **Q.** Why did the number of investigations slow down or cease?
 7 **A.** Because we weren't doing -- I'm assuming that at the
 8 time we just stopped investigating things under PACE.
 9 **Q.** But why? Presumably the shortfalls were still
 10 continuing, the postmasters were still stealing the
 11 money?
 12 **A.** Well, I don't know. That didn't -- wasn't something
 13 I thought about. At the end of the day, we weren't
 14 receiving new cases.
 15 **Q.** But why? If you've got faith in the system and the data
 16 that it produces, the fact that these consultants have
 17 come in to investigate the system, why does that mean
 18 there is a cessation or a slowdown in investigations?
 19 **A.** Well, they must have obviously identified some issues,
 20 I guess.
 21 **Q.** Were you upset at this?
 22 **A.** No, not at all.
 23 **Q.** What did you think of the fact that investigations had
 24 stopped or had slowed right now?
 25 **A.** Well, it just meant that, as far as Proceeds of Crime
 127

1 you were on the verge of leaving the Security Team --
 2 **A.** That's correct, yeah.
 3 **Q.** -- and, at that time, you recall that investigations and
 4 financial investigations had slowed down considerably
 5 and may have ceased altogether but you can't be
 6 completely sure?
 7 **A.** Yeah.
 8 **Q.** The slowdown of investigations and slow down of
 9 financial investigations meant that you wouldn't be able
 10 to use POCA powers for recovery of losses; is that
 11 right?
 12 **A.** That's correct, yeah.
 13 **Q.** Why had investigations and financial investigations
 14 slowed down considerably and/or ceased?
 15 **A.** Well, at Second Sight had been in to -- at the time,
 16 I think 2012, Second Sight came in, and they were asked
 17 to review cases. I don't think we were ever formally
 18 told why cases were slowing down. But it was obvious to
 19 me that, you know, we were -- well, there was a review
 20 going on. I knew there were internal meetings happening
 21 but I wasn't involved in any of those.
 22 **Q.** What was the relationship between Second Sight reviewing
 23 some cases and the slow down of investigations or
 24 cessation of investigations?
 25 **A.** Well, I'm assuming they were connected.
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1 cases, we wouldn't be dealing with them any more, and
 2 that would be that.
 3 **Q.** Can we look, please, at POL00121975. If we can start,
 4 please, at page 5. Scroll up to page 4. Just keep
 5 going. Thank you. We can see your email of
 6 1st November to Andy Hayward, Rob King and Dave Pardoe.
 7 At this time what function did each of them perform?
 8 **A.** Well, they were all Senior Managers. I'm not sure what
 9 Andy Hayward's role was. I think Dave Pardoe might have
 10 been my line manager then. Well, no, that would have
 11 been -- no, it wouldn't have been. That's not right.
 12 I'm not sure what roles they were doing. They were all
 13 Senior Managers within the Security Team.
 14 **Q.** Within the Security Team?
 15 **A.** Yeah, yeah.
 16 **Q.** So they were all within your team --
 17 **A.** Yes, yeah.
 18 **Q.** -- and at this time you were an AFI?
 19 **A.** Correct.
 20 **Q.** You say:
 21 "Andy
 22 "As discussed
 23 "Compensation should be sought post-conviction for
 24 all non-POCA cases, where [Post Office] has incurred
 25 a loss (At the moment the ...)"
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1 Is that Financial Investigator's trigger?
 2 **A.** Yeah.
 3 **Q.** "... for involvement is [more than] £15,000). Once
 4 a compensation order has been made by the court then the
 5 defendant owes [the Post Office] that money and has to
 6 pay up within the timescales. However unlike the
 7 [Proceeds of Crime Act], compensation orders have 'no
 8 teeth' and enforcing these orders is time consuming and
 9 in sum cases ineffective, ending up with defendants
 10 paying minimal monthly instalments over a prolonged
 11 period of time.
 12 "In [Post Office] cases [one of the provisions]
 13 covers the issue of compensation ... the court can
 14 confiscate the defendants assets to the value of the
 15 benefit figure and also compensate the victim, so for
 16 example, if a subpostmaster is convicted of theft of
 17 £50,000 and has sufficient assets, the court could make
 18 [an order] for £50,000 and make a further compensation
 19 order for £50,000 which is awarded to the victim, in
 20 effect a 'double-whammy'. In reality, in all the cases
 21 I have dealt with, the Post Office will only seek
 22 compensation 'out of' the confiscation order, but this
 23 is a matter decided by the Judge. It is crucial at
 24 these confiscation hearings to ensure that the Post
 25 Office are awarded compensation from the Confiscation

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1 Do you remember who the JFSA were?
 2 **A.** Yes, the Justice for Subpostmasters Alliance.
 3 **Q.** "... and [Post Office] Criminal Enforcement Policy
 4 documents as requested I enclose [the Post Office]
 5 approach to compensation from Graham Ward ..."
 6 **A.** Yes.
 7 **Q.** So it looks like, if you look at the title, JFSA and
 8 Post Office Criminal Enforcement Policy, that the
 9 request was made in the context of asking -- somebody
 10 asking about what Post Office's enforcement policy was;
 11 do you agree?
 12 **A.** Well, I -- my understanding, that they were just asking
 13 for clarity on how we approached confiscation and
 14 compensation orders.
 15 **Q.** Okay. If we carry on up the page, please, a thank you
 16 to Mr Singh. Second line:
 17 "This is helpful background but I am not clear
 18 whether this is an instruction provided to counsel in
 19 each and every case/whether this is strict policy at
 20 [Post Office] or this is just Graham Ward's view?"
 21 **A.** I don't recall it being a policy and it wasn't just my
 22 view; it's what we did in the FIU.
 23 **Q.** So practice?
 24 **A.** Practice, yeah.
 25 **Q.** Then further up the page, please. Jarnail Singh comes

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1 Order."
 2 Then there is a provision that we needn't look at.
 3 What was the context in which you were writing here?
 4 **A.** What was the context?
 5 **Q.** Yes.
 6 **A.** I was explaining that Proceeds of Crime cases, we would
 7 seek compensation orders out of the confiscation order
 8 rather than, you know, a judge could impose
 9 a compensation order and a confiscation order, which we
 10 never went for at all. We just went for a loss.
 11 **Q.** That's what you were saying. We can see that. Why were
 12 you saying it?
 13 **A.** Because I was presumably asked for some clarity.
 14 **Q.** If we scroll up, please. Keep going. We can see that
 15 Mr Hayward sends your email on to Jarnail Singh.
 16 **A.** Yeah.
 17 **Q.** Then if we carry on, we can see that Mr Singh duly sends
 18 it on to Sally Roff and Mary Lawrence. Do you know who
 19 they are?
 20 **A.** No, I don't, no.
 21 **Q.** I think we can certainly see who one of them is further
 22 up the page. She's an associate in DAC Beachcroft.
 23 Just reading back to what Mr Singh said:
 24 "Thank you for your kind help and assisting with the
 25 JFSA ..."

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1 back to you and said can you provide him with views on
 2 Mary's email.
 3 Further up the page, please. You forward that chain
 4 to David Posnett, yes?
 5 **A.** Yes.
 6 **Q.** You say "Elv"; is that Mr Posnett?
 7 **A.** Yes, it is.
 8 **Q.** Why was he called "Elv"?
 9 **A.** It goes back to when we first worked on the counter
 10 together back in, whenever it was, 1980s, he just had
 11 an Elvis haircut.
 12 **Q.** Right:
 13 "Elv
 14 "I am; lost for words ... whilst in the pub earlier,
 15 Jarnail rang me about this very subject and we spoke for
 16 about 15 minutes (presumably he either didn't understand
 17 what I was on about or didn't get the answer he wanted
 18 to hear!!) ... personally I think these issues are for
 19 the [senior leadership team], what are your views?
 20 "... my answer would be as follows:
 21 ""As things stand we are a public body with
 22 responsibility for public money. We currently have
 23 a prosecution policy and are recognised by the Home
 24 Office as a non-police prosecuting authority with PACE
 25 trained Investigators and our own legal team ...

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1 Following a successful conviction we robustly seek to
2 recover monies stolen by Proceeds of Crime Act
3 confiscation proceedings.

4 "I can only reiterate what I have said below and as
5 far as I'm [concerned] it is [Post Office's] policy to
6 recover money in all cases where we have suffered
7 a loss, which will include seeking compensation orders
8 where there are no POCA proceedings and seeking
9 confiscation orders where POCA has been instigated.

10 "I do not believe we will easily be able to provide
11 stats to support which cases we have been awarded
12 compensation orders for ... as the Casework spreadsheet
13 does not have a column to record that. A trawl of
14 recently closed case files where we have prosecuted may
15 provide some details. However Dave and I have been
16 recording details of cases where we have been awarded
17 confiscation orders.

18 "As you will be aware, the Late Account Team will
19 also be involved in recovery using civil action to
20 pursue repayment of losses'.

21 "I could waffle on but I think we are flogging
22 a dead horse, I get the impression there's a strong
23 desire from the powers that be, to water down our
24 approach to prosecution and recovery, a sad,
25 shortsighted and disastrous move if I'm right.

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1 though we were going to stop prosecutions, even though
2 the system was robust and reliable, which I must --

3 **Q.** You were fed up about that?

4 **A.** At the time. I just thought, you know, if the system is
5 robust and reliable, why do we need to worry about
6 stopping it?

7 **Q.** You were angry, weren't you?

8 **A.** I wasn't, no not really. I'm not an angry type of
9 person. I mean, at the end of the day, if -- you know,
10 I just get on with things.

11 **Q.** You wanted to get on with prosecuting people?

12 **A.** No, I was --

13 **Q.** Taking money back from them, didn't you?

14 **A.** No, no, I didn't. I was actually leaving the team.
15 I probably already -- I was already aware that I was
16 leaving the team at that time.

17 **Q.** Well, you were leaving the team because things were
18 winding down and you weren't going to be able to carry
19 on prosecuting people and taking money from them,
20 weren't you?

21 **A.** No, that's not the case at all. I'd applied for jobs
22 well, a view -- quite a few years previous. So, no.

23 **Q.** At the very least, would you agree that the chain we've
24 looked at here shows that you were aware that the impact
25 of Horizon challenges and the work of the JFSA was

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1 "Goodnight."

2 Now, you're here writing I think at 9.54 at night,
3 if we look at the top of the page, having been in the
4 pub.

5 **A.** Well, I don't know if I was -- well, I wouldn't have
6 been in the pub writing that email.

7 **Q.** No, but you had been in the pub?

8 **A.** Yeah.

9 **Q.** Was this is an important topic to Mr Singh then, to
10 engage you after hours whilst you were drinking?

11 **A.** Well, I don't know what time he rang me.

12 **Q.** You may have been in the pub in the afternoon?

13 **A.** Well, it may have been. I've got no recollection at
14 all. It may have been just after work, four o'clock,
15 whatever.

16 **Q.** Was it an important topic that you would interrupt some
17 time in the pub to spend 15 minutes talking about it to
18 Jarnail Singh?

19 **A.** Yeah, if Jarnail rang me up and asked me a question
20 I would try and answer it.

21 **Q.** And what was your concern; why were you lost for words?

22 **A.** I think it's -- you know, at the time my feeling was
23 because we were still being told by the business that
24 the Horizon system was robust and, you know, we could
25 rely on it, my view at the time was that it looked as

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1 impacting on the strategy and decision making of the
2 Post Office in late 2012.

3 **A.** Yes, I would agree with that.

4 **Q.** You and your colleagues, including Mr Posnett, would
5 have been well aware of the significance of those
6 challenges to the Post Office; do you agree?

7 **A.** Yeah, of course, yeah.

8 **Q.** By this time, late 2012, Jarnail Singh was the Head of
9 the Criminal Law Team, wasn't he?

10 **A.** I think he was the Criminal Law Team. I don't think
11 there were any other lawyers there.

12 **Q.** Was he consulting you on the Security Team's strategy,
13 so far as enforcement was concerned?

14 **A.** Well, he asked me a question about confiscation and
15 compensation orders but he didn't consult me about
16 anything else that I can recall.

17 **Q.** You say that you won't be able easily to provide
18 statistics to support those cases in which compensation
19 orders had been made, yes?

20 **A.** Yeah.

21 **Q.** Wasn't the Post Office monitoring which of its cases
22 resulted in a compensation order?

23 **A.** Well, that would have been recorded on the JARD system
24 we used, the Joint Asset Recovery Database, so I would
25 have been able to have accessed that to obtain that

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1 information but it would have been there.

2 **Q.** You say, "I do not believe we'll easily be able to
3 provide stats"?

4 **A.** Mm.

5 **Q.** Why wouldn't you easily have been able to provide stats?

6 **A.** Because we -- at that time, we had to access JARD via
7 a police station. So, you know, it would just have been
8 a case of having to go to a police station and find
9 an available computer that we could log on to access
10 JARD to recover the information. So it could have been
11 done but ...

12 **Q.** Scrolling down to the bottom, please -- sorry, before we
13 got to the bottom, just scroll up, please.

14 You say that Mr Singh either didn't understand what
15 you were on about -- which, of course, is
16 a possibility -- or didn't get the answer he wanted to
17 hear. Why did you think that he didn't get the answer
18 that he wanted to hear?

19 **A.** Honestly, I don't -- no idea now. I can't recall.

20 **Q.** Was it because he was in favour of what you've described
21 as watering down or winding down the investigation and
22 prosecution function?

23 **A.** Not that I'm aware of, no. As I say, I really don't
24 know.

25 **Q.** If we go to the bottom of the page then, please. You
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1 approach to prosecution and recovery?

2 **A.** I have no idea why I would think that, I'm sorry.

3 **Q.** Why did you consider the change in approach to be sad,
4 shortsighted and disastrous?

5 **A.** Well, I do believe that a prosecution policy is
6 important. I think -- I do think it sends out a good
7 message that the business is going to proactively deal
8 with people that are committing offences. I think, you
9 know, I've worked in security a long time, I think it's
10 important. So I think moving away from that would have
11 been a bad thing. That was just my personal opinion.

12 I do say that this email was obviously late at night
13 and sometimes you say things emails that maybe sound
14 a bit worse than you actually mean.

15 **Q.** Is that the case here?

16 **A.** Well, possibly, yeah.

17 **Q.** Or is it that, after you'd had a drink, your true
18 feelings were being revealed?

19 **A.** No, not at all. I'm not a drinker at all. So I would
20 have just been having, probably, one drink on the way
21 home.

22 **Q.** Why would it be disastrous to either slow down
23 prosecutions or stop them whilst experts investigated
24 the integrity of Horizon?

25 **A.** Well, I wasn't referring to the investigation that was
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1 say you think you're flogging a dead horse. You get the
2 impression there's "a strong desire from the powers that
3 be to water down our approach to prosecution and
4 recovery". Why did you think there was a strong desire
5 from the powers that be to water down the approach to
6 prosecution and recovery?

7 **A.** I think cases had dried up by that time. So I don't
8 recall exactly. As I say, it's quite a while ago but,
9 towards the end of my time in the Security Team, new
10 cases had dried up completely, more or less, so it was
11 just the old cases we were dealing with.

12 **Q.** But dried up deliberately because there weren't steps
13 being taken proactively to investigate them --

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

15 **Q.** -- rather than subpostmasters suddenly becoming honest
16 again?

17 **A.** Quite possibly, yeah.

18 **Q.** You say that this strong desire to water down is one of
19 the powers that be. Who are the powers that be that you
20 are referring to?

21 **A.** Well, I was probably just referring to our senior
22 management within Security.

23 **Q.** Being who?

24 **A.** Well, at the time, it would have been John Scott.

25 **Q.** Why did you think that he wanted to water down the
138

1 going on with this --

2 **Q.** This was all in the context, wasn't it Mr Ward, of
3 Second Sight?

4 **A.** Sorry, this is what?

5 **Q.** All in the context of Second Sight?

6 **A.** I don't think I'd have been thinking of Second Sight at
7 all at the time.

8 **Q.** Why did you think the powers that be were watering down
9 the approach to prosecution and recovery? Was it
10 independent of what Second Sight were doing, then?

11 **A.** No, I don't think it would have been, but -- I don't
12 know what to say. It was just an email.

13 **Q.** Well, it's not just an email, is it? It's you speaking
14 to us, back in 2012, revealing what you thought.

15 **A.** Well, as I said, I still believed -- or we were told --
16 I don't know, you know -- we were told that the system
17 was robust and reliable. I believed that --

18 **Q.** Told by who?

19 **A.** Well, it was senior management. You know, it was
20 communications that came out. You know, we were being
21 told that, you know, we were robustly defending the
22 system and, rightly or wrongly, I believed that.

23 **Q.** How were these communications distributed to you?

24 **A.** Well, normally, I think there were emails that came out.

25 **Q.** When you say "senior management" do you mean senior
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1 management within the Security Team or from outside the
 2 Security Team?
 3 **A.** No, it was -- it wouldn't have been the Security Team,
 4 no. This would have been the business.
 5 **Q.** So do you mean the very senior leadership within the
 6 team?
 7 **A.** Well, yeah, that's where it --
 8 **Q.** Within the Post Office?
 9 **A.** -- would come from, yeah. It was the Communications
 10 Team that would send out the messages. I can't
 11 remember, you know, who -- a name of someone but, yes,
 12 there were messages that came out regularly and
 13 I believed them.
 14 **Q.** What did they say?
 15 **A.** Well, just, you know, that -- reiterating that the
 16 business is challenging or defending the challenges to
 17 Horizon and has full confidence in the Horizon system.
 18 **Q.** Before the break, please, can we look at POL00329521,
 19 page 2 to start with, please. If we just scroll down
 20 a little bit. Thank you. Email from Gary Thomas to
 21 Dave Posnett:
 22 "... I ... still have [some] electronic documents
 23 [about a branch or branches]."
 24 Then scroll up, please. Keep going. You email him:
 25 "Why are you pleased ... you've breached [the Data
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1 **A.** No, I wouldn't agree with anything that Gary said there
 2 at all.
 3 **Q.** Scroll up, please. Presumably, that's -- just stop
 4 there. You didn't reply that at the time, "Gary,
 5 I don't agree with anything you've said there", did you?
 6 **A.** No, I didn't.
 7 **Q.** You said, "I will be all right if I get [voluntary
 8 redundancy]"?
 9 **A.** Yeah.
 10 **Q.** Just scroll back down to the text of the email. Why
 11 would he say that John Scott had to get rid of you if
 12 that's not true?
 13 **A.** Well, I think -- and I don't know what Gary was thinking
 14 there, it was a rant email that was most unlike him.
 15 I mentioned earlier in my evidence that there had been
 16 a policy decision by Mr Scott to introduce a hub way of
 17 working. So that affected Gary Thomas because he was
 18 based in -- I think he was somewhere on the South Coast
 19 and travelling in to London was just totally impractical
 20 for him, so he had to find a different job.
 21 I don't think, when he said "get rid of us", I don't
 22 know that that was applying to anybody else. I really
 23 don't know. I've no idea what Gary would have been
 24 thinking.
 25 **Q.** Did you "laugh out loud" when you got this, as he
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1 Protection Act] as you should have deleted them years
 2 ago ... [smiley face]."
 3 Further up the page, please. He says in reply:
 4 "Because I want to prove there is FFFFiiinnn no
 5 'Case for the Justice of Thieving SubPostmasters' ..."
 6 Would you understand that to be a play on words on
 7 JFSA?
 8 **A.** I would never have even thought of that, no, but I can
 9 see it may be, yeah.
 10 **Q.** "... and that we were the best Investigators they ever
 11 had and they were all crooks!! Oh and we never hit our
 12 [Post Office] profit targets anymore as we stopped
 13 getting £XX million in recoveries from bloody good
 14 financial recoveries through my good friends Ward,
 15 Harbinson, Posnett and the like!!
 16 "End of rant!! Hence why Scott had to get rid of us
 17 [because] we is right and spoke out!! Power To The
 18 People Wolfie Smith!!
 19 "All right my old Gunner Mate?"
 20 Presumably that bit is addressed to you --
 21 **A.** Yeah.
 22 **Q.** -- as an Arsenal fan, presumably; is that right?
 23 **A.** Yeah.
 24 **Q.** Did Mr Scott have to get rid of you because you were
 25 right and spoke out?
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1 suggests at the end?
 2 **A.** No, of course not.
 3 **Q.** Well, your email reply within two minutes -- his email
 4 is at 5.12 and yours is at 5.14 minutes -- hardly shows
 5 you to have objected to it, does it?
 6 **A.** Well, no, I didn't --
 7 **Q.** These were your sentiments, as well as his, weren't
 8 they?
 9 **A.** Absolutely not.
 10 **Q.** You realised at the time that the Justice for
 11 Subpostmasters Alliance, the JFSA, who had been
 12 campaigning for years, were being mocked by his
 13 capitalisation of "Case for the Justice Of Thieving
 14 SubPostmasters", it's obvious, isn't it?
 15 **A.** Well, I don't remember the email. I wouldn't have seen
 16 that at all, no, and it certainly wasn't my view.
 17 **Q.** Well, what was Mr Thomas referring to when he said,
 18 "Hence Scott had to get rid of us when we spoke out"?
 19 Is that just a figment of his imagination?
 20 **A.** Well, I don't know what he's referring to, it's --
 21 I haven't written that, so I really don't know what he
 22 was thinking.
 23 **Q.** Was there a view amongst you and him, and perhaps
 24 Mr Harbinson and Mr Posnett, that you were the best
 25 Investigators that the Post Office had ever had and that
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1 subpostmasters were "all crooks"?

2 **A.** No.

3 **Q.** Is that a figment of his imagination too?

4 **A.** Well, I don't know what was going on in Gary's head but

5 it certainly wasn't my view and I'm sure it wasn't the

6 view of Mr Posnett and Mr Harbinson.

7 **Q.** He says sarcastically or ironically, "Oh and we never

8 hit our Post Office profit targets". What were Post

9 Office profit targets?

10 **A.** I've no idea.

11 **Q.** Is that a reference to needing to recover a percentage

12 of all shortfalls; remember a 65 per cent figure?

13 **A.** There wasn't a 65 per cent figure when I was there, as

14 far as I can recall. I think -- are you referring to

15 the documents I was sent last Friday? Yeah. So that

16 was 2013/14, I think, 2013 and 14.

17 **Q.** Was there any profit target or recovery target when you

18 were a Financial Investigator?

19 **A.** I don't think there was. I'm not sure. There may well

20 have been but it would never have affected the way I did

21 the job at all.

22 **Q.** So what's he referring to there when he says, "We never

23 hit our Post Office profit targets anymore"?

24 **A.** I've no idea.

25 **Q.** So this to you, from beginning to end, is all

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1 **MR BEER:** Therefore I'm allowing sufficient time for that.

2 I'm going to ask questions, I think, only about

3 Mr Ward's involvement in the case of Noel Hughie Thomas.

4 **SIR WYN WILLIAMS:** Mm-hm.

5 **MR BEER:** Mr Ward, in your statement in paragraphs --

6 I think it's 69 onwards, which is on page 23, you set

7 out your involvement in the prosecution of Noel Thomas.

8 **A.** Yeah.

9 **Q.** You tell us, in summary, that you were the Casework

10 Manager in relation to Mr Thomas' case; is that right?

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

12 **Q.** You therefore acted as the single point of contact

13 between Fujitsu and the Post Office in relation to

14 litigation support in that case --

15 **A.** That's right.

16 **Q.** -- and, in particular, in relation to the ARQ process?

17 **A.** That's correct.

18 **Q.** Now, I think contemporaneous emails that we're going to

19 look at and draft witness statements attached to them

20 show us that you and Diane Matthews were involved in

21 reviewing some witness statements; is that right?

22 **A.** That's correct.

23 **Q.** Was that a normal function for you, as the Casework

24 Manager, to perform?

25 **A.** No, it wasn't, no.

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1 nonsense --

2 **A.** Well, it's just --

3 **Q.** -- it makes no sense at all?

4 **A.** Yeah, well, I mean, it's just a rant.

5 **Q.** Who spoke out?

6 **A.** Who spoke out?

7 **Q.** Yeah.

8 **A.** Again, I've got no idea.

9 **MR BEER:** Thank you, sir, that might be an appropriate

10 moment. I wonder if we can take a 15-minute break,

11 please, sir.

12 **SIR WYN WILLIAMS:** Thank you so when do we return?

13 **MR BEER:** 3.15, sir.

14 **SIR WYN WILLIAMS:** Yes.

15 **MR BEER:** Thank you.

16 **(3.01 pm)**

17 **(A short break)**

18 **(3.15 pm)**

19 **MR BEER:** Good afternoon, sir. Can you see and hear us?

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

21 **MR BEER:** Sir, just by way of explanations of timings, I'm

22 proposing to ask questions until 4.00 pm because I know

23 that each of the three subpostmaster groups have

24 questions that will take about 30 minutes.

25 **SIR WYN WILLIAMS:** Fine.

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1 **Q.** They also show that you were involved in the drafting of

2 Mr Jenkins' witness statement, ie making drafting

3 changes and suggestions to him?

4 **A.** Yes, that's correct, I offered some comments, yeah.

5 **Q.** Was that a usual function for you to perform?

6 **A.** No, it wasn't.

7 **Q.** If it was not usual for you to review witness

8 statements, less still to suggest the contents of them,

9 why did you do so on this occasion?

10 **A.** I think, as I said earlier, Neneh Lowther had asked me

11 to review or there was an email saying, "Graham for

12 review". I'm assuming that she may have called me, you

13 know, just to ask "Would you mind because this is a new

14 statement". It related to nil transactions and it was

15 banking transactions, so maybe they just felt they

16 needed a little bit of support. I don't know why I said

17 yes, I'd normally just pass it straight on to the

18 Investigator to deal with but I guess I was just trying

19 to be helpful.

20 **Q.** If the function of Casework Management, so far as

21 compliance was concerned, was checking the layout and

22 physical tributes of a file, stickers, font size, things

23 like that, why were you getting involved in the

24 substance here?

25 **A.** Just because I was asked if I would help and I tried to

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1 be helpful but, on reflection, obviously, I shouldn't
 2 have got involved at all.

3 **Q.** Can we look, please -- and I'm afraid there's a long
 4 trawl of documents we're going to have to go through to
 5 address the issues fairly -- to start with, at
 6 FUJ00155181. Can we start, please, at page 17. If we
 7 just look at the top of -- just scroll up -- the bottom
 8 of 16. We can see Diane Matthews emailing you on
 9 14 October 2005 about Mr Thomas' branch?

10 **A.** Yeah.

11 **Q.** What function did Ms Matthews perform at this time,
 12 October 2005?

13 **A.** She was an Investigator.

14 **Q.** Was she local to you or was she out in Mr Thomas' area?

15 **A.** No, she was up North.

16 **Q.** "Graham,
 17 "Just to clarify, the subpostmaster has not made any
 18 calls to HSH or NBSC prior to yesterday's audit and is
 19 now voicing concerns over the nil transactions on card
 20 account/online banking transactions.
 21 "I believe there are at least 2 scenarios where
 22 a nil value will be recorded", and she sets them out.
 23 Both to do with what the customer does, yes?

24 **A.** Yes.

25 **Q.** If we scroll on, please:

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1 to somebody else and, as the -- she was asking for
 2 Horizon data then it seemed -- it just seemed the right
 3 thing to do to ask Fujitsu.

4 **Q.** So she was asking you firstly to look for other
 5 possibilities, ie other than the two which she has
 6 mentioned, for the causes of nil transactions, or nil
 7 values on transactions, yes?

8 **A.** Yeah.

9 **Q.** She was asking you, secondly, to check that there were
 10 no problems with the Horizon kit at Mr Thomas' branch,
 11 correct?

12 **A.** Yes.

13 **Q.** So she was asking in that second regard about hardware
 14 at Mr Thomas' branch, wasn't she?

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

16 **Q.** Can we go to page 16, please, and your email at 4.15.
 17 You email the Fujitsu general address, which you
 18 described earlier, copying Ms Matthews in and copying
 19 Charles Leighton in. Who was Charles Leighton?

20 **A.** He worked in Security at the time and I think he had
 21 quite a good knowledge of Horizon. That may be why
 22 I copied him in.

23 **Q.** What did he do in Security?

24 **A.** I can't remember his job title.

25 **Q.** Was he in your office?

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1 "Please can you check any other possibilities of nil
 2 values on these types of transactions with Fujitsu.
 3 "As the subpostmaster is blaming the [Horizon]
 4 system on his losses, please could we check that there
 5 are no problems with the Horizon kit at the branch.
 6 "The branch will remain closed until we are happy
 7 that the Horizon system is fully operational."
 8 Before you received this email, did you know what
 9 nil transactions were?

10 **A.** No.

11 **Q.** Did you, therefore, not know what the possible causes of
 12 nil transactions were?

13 **A.** Yeah, that's correct. I wouldn't have known.

14 **Q.** Other than speaking, as we know, via email to Fujitsu,
 15 did you speak with or check with anyone within the Post
 16 Office as to what nil transactions were?

17 **A.** Not that I can recall, no.

18 **Q.** Or what their causes were?

19 **A.** No, not that I can recall, no.

20 **Q.** Or whether anyone within Post Office had seen anything
 21 similar or a previous problem had arisen?

22 **A.** No.

23 **Q.** So why did you go to Fujitsu?

24 **A.** Well, I would have assumed that Diane would have done
 25 that in her capacity as an Investigator, may have spoken

150

1 **A.** No, I don't think he was, no.

2 **Q.** In any event, you forward Ms Matthews' email to Fujitsu
 3 copying these people in?

4 **A.** Yeah.

5 **Q.** You say that it "says it all":
 6 "... is there a check that can be made to ensure
 7 that there are or were no serious errors in the system
 8 at this Post Office?"
 9 By that, did you intend Fujitsu to check the
 10 position at the branch itself?

11 **A.** Yes.

12 **Q.** "We already have details of calls made to the Helpdesk
 13 (see spreadsheet), which do not highlight anything
 14 obvious. Are there any general error type reports that
 15 will tell when there is a problem with the system which
 16 the Post Office may not necessarily be aware of,
 17 particularly in relation to the highlighted paragraph
 18 ... have there been any similar problems elsewhere?
 19 (I've heard of Tivoli event logs ... could these be
 20 relevant?)
 21 "This case is in its early stages, but if it were to
 22 proceed to a prosecution, we'd likely need a statement
 23 which outlines how you can confirm that there were no
 24 operating errors within this office's system. I haven't
 25 submitted an ARQ but I can ..."

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1 In the second line, you ask for a check for no
 2 serious errors on the system.
 3 **A.** Yes, I do, yeah.
 4 **Q.** Why were you asking for checks to be made on serious
 5 errors?
 6 **A.** The word "serious" obviously shouldn't have been there;
 7 it should have been "errors".
 8 **Q.** You say that you've heard of Tivoli log events. Can you
 9 recall what you had heard about Tivoli log events?
 10 **A.** No, I'm sorry, I've got no recollection of that at all.
 11 **Q.** You say in the last paragraph that you're likely to need
 12 a statement which outlines how you can confirm there
 13 were no operating errors within this office's system.
 14 At this point, at the time of writing, you didn't know
 15 one way or the other whether there were problems in the
 16 system, did you?
 17 **A.** No, I didn't, no.
 18 **Q.** Why were you presuming that there were not?
 19 **A.** Again, it's just a one-sided view that we seem to -- or
 20 I seem to have had at that time.
 21 **Q.** Was that a view that lasted for quite a long time,
 22 Mr Ward?
 23 **A.** Well, like I say, I trusted, you know, the business's
 24 messages.
 25 **Q.** At this time in October 2005, there wouldn't have been
 153

1 what data they are auditing that defines a nil
 2 transaction. Is it zero transaction values in the R or
 3 A messages? Or are they auditing data in some host
 4 database or log? This matters because, for example, the
 5 counter does not send up an amount value in the R
 6 message for 'Withdraw to limit', but that may be
 7 represented as a zero value in a log or database field.
 8 The same might be true for Change PIN and Balance
 9 Enquiry.
 10 "All banking transactions are approved online with
 11 the acquirer ... These other reasons might also cause
 12 a nil transaction.
 13 "Nil transactions could also be caused by errors in
 14 PIN Pad, counter, agents or host code depending on what
 15 constitutes a 'nil transaction'. This cannot be
 16 determined without access to the appropriate system
 17 logs'.
 18 "In other words, we need to check the system logs.
 19 How would you like to proceed?"
 20 So she's setting out a range of possibilities for
 21 the cause of a nil transaction being recorded, but which
 22 can only be checked via the appropriate system logs, and
 23 might require sudden sources to be accessed, correct?
 24 **A.** Well, she's just said, "We need to check the system
 25 logs", so I wouldn't have known what logs that would be.
 155

1 messages coming down, would there, from on high --
 2 **A.** No.
 3 **Q.** -- cascading a belief in the integrity of Horizon?
 4 **A.** I think, at that time, you know, there weren't any major
 5 issues. So --
 6 **Q.** As somebody connected to the investigation process, you
 7 needed to have an open mind, didn't you?
 8 **A.** Yeah.
 9 **Q.** Not a closed mind, "Please give me a witness statement
 10 that shows that the subpostmasters are wrong"?
 11 **A.** No -- I mean, I agree, yeah.
 12 **Q.** Did you have a closed mind?
 13 **A.** Well, I didn't think so at the time.
 14 **Q.** Did that closed mind operate right up until 2015: "we
 15 was right", as Mr Thomas wrote to you?
 16 **A.** No, I always tried to keep an open mind with everything
 17 I did but, you know, clearly, in this case, I didn't
 18 have an open mind, no.
 19 **Q.** Page 15, please. Scroll down, please. Ms Thomas
 20 replies to you:
 21 "Graham.
 22 "... nothing is ever straightforward! Here's some
 23 feedback --
 24 "The original email makes reference to an audit.
 25 To answer your question definitively I'd need to know
 154

1 **Q.** If we look at your reply at the top, "you've confused
 2 me!" and you ask some questions:
 3 "I think it best if the system logs are examined in
 4 the first instance (do you need an ARQ?) going back to
 5 1 April 2005. Is it possible for you to run a report to
 6 show 'nil' values to the transaction examples described,
 7 so we can see how often it happens?"
 8 Page 14, please. You email, on 25 October,
 9 Ms Matthews, Mr Dawkins and Penny Thomas, saying you've
 10 agreed the following course of action:
 11 "Fujitsu will instigate a thorough analysis of the
 12 system at the office going back one month to the date of
 13 the audit (if we need to go back further we will do).
 14 I do not see a need to remove hardware at this point to
 15 conduct any specialist examination of the processors,
 16 particularly given the postmaster did not report any
 17 faults with the system to the Helpdesk. I'd suggest
 18 that a call is logged with the Helpdesk outlining the
 19 'alleged' fault and asking them to send over an engineer
 20 to the site to conduct a test of the equipment prior to
 21 the office being reopened. I'm sure they can also
 22 perform a few test transactions.
 23 "Penny -- please find attached the relevant ARQ."
 24 That's an ARQ that ends with 401, yes; can you see
 25 that?
 156

1 A. Yes.

2 Q. Can we look at page 1, please? This is ARQ 401, we can
3 see this from the right-hand side. Can you see the
4 reference there?

5 A. Yes.

6 Q. Date range, 14 September to 13 October, 30 days. Scroll
7 down, please:

8 "Please conduct an analysis of all Helpdesk calls
9 for [that] period.
10 "... conduct a thorough examination of the system in
11 general with a view to refuting the postmaster's
12 allegation that there is a fault with the 'nil'
13 transactions on card account/online banking
14 transactions.
15 "Please bear in mind we are investigating
16 a substantial shortage in accounts and should this
17 proceed to prosecution we may be asking for a supporting
18 witness statement."
19 You're asking there for a thorough examination of
20 the system. What did you think would be done as
21 a result of that request?

22 A. Well, I would have assumed that that would -- well,
23 I think I've just tried to explain it as clearly as
24 I can. You know, she's -- Penny would have been aware
25 of the email chain, so I'm just trying to make sure that

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1 Q. But this ARQ request doesn't ask for ARQ data?

2 A. No.

3 Q. The form here is -- this section that we're looking at
4 in the middle of the page -- a free text box --

5 A. Yes.

6 Q. -- it's not a dropdown, it's not populated with preset
7 requests; you can say what you want in here?

8 A. Exactly, yeah.

9 Q. Again, you say that you're asking for an examination
10 with a view to refuting his allegation that there's
11 a fault with the system. Why wouldn't you say with
12 a view to investigating the postmaster's allegation?

13 A. I've already acknowledged, I think, that -- yeah, that's
14 how it should have been worded and I apologise for that.
15 It's --

16 Q. If I was to look for -- I'm so sorry, I spoke over you.

17 A. It's a one-sided view, I agree, and it's -- yeah,
18 I should have been wording it better.

19 Q. If I was to look over ARQ requests for other
20 communications, outside the 20-odd case studies we're
21 looking at in this Inquiry, of which Mr Thomas' case is
22 one, am I likely to see that one-sided view replicated?

23 A. I would think so, yeah.

24 Q. Can we look, please, at FUJ00152587, and look at page 8,
25 please. If we just look at the bottom of the next page,

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1 they do all that they need to do to explain or detail
2 what the nil transactions were for that period, if there
3 were any, and what impact it would have on the actual
4 balance.

5 Q. So you're asking for ARQ data for those 30 days, yes; is
6 that right?

7 A. Yeah, I mean, it's worded differently to normal ARQs.
8 I'm not quite sure. You know, I don't recall this very
9 well at all but I think what I'm asking for there is
10 an analysis of just Helpdesk calls, rather than the ARQ
11 data, because this is banking transactions. So ARQ data
12 is, you know, event and transaction logs.

13 Q. Okay, so the 30-day period is a reference to the
14 sentence that appears underneath, "Conduct an analysis
15 of all Helpdesk calls"?

16 A. Yeah, I think so yeah.

17 Q. Is that all Helpdesk calls for this branch?

18 A. Just for the branch, yeah.

19 Q. I thought it had been established that he hadn't made
20 any Helpdesk calls?

21 A. Yeah, correct --

22 Q. So if you knew that he wasn't making Helpdesk calls why
23 were you asking for 30 days of Helpdesk calls to be
24 analysed?

25 A. Yeah, I'm -- that's obviously an oversight on my part.

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1 page 7. Just a bit more, please.

2 We're now in March 2006 and you're emailing the
3 Fujitsu email account in relation to a range of cases,
4 "ARQs, statement request and assistance", and you speak
5 about two attached files:

6 "Both of the above requests relate to cases where
7 the Post Office are being challenged about the accuracy
8 ..."
9 You deal with Marine Drive and Torquay Road next,
10 further down, if we scroll on, please. Then at the
11 bottom of the page, you say:
12 "On a separate matter, I also require a witness
13 statement in [relation] to the following ARQs", and
14 there's one of the ones we've seen already, 401.

15 A. Yes.

16 Q. There's also 459 and 460, all of which relate to
17 Mr Thomas' branch:
18 "we need the usual (leave out paragraphs H(b) and J
19 but we do need K) covering an analysis over the period
20 01/11/04 to 30/11/05. Penny -- you may recall this one
21 relates to nil transactions, my previous emails ...
22 refer. Can you add an extra paragraph in your statement
23 explaining how online banking transactions are processed
24 and the data downloaded and how nil transactions can
25 occur?"

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1 So five or six months has passed now and you're now
2 asking for a witness statement to address the things
3 that had been mentioned in the three emails that you
4 refer to there; is that right?

5 **A.** Sounds like it, yeah.

6 **Q.** Can we go to FUJ00152582. Look at page 3, please. This
7 is 11 days later, you emailing Penny Thomas about
8 Mr Thomas' branch:

9 "These are the nil transactions you sent us and will
10 need to be produced and explained within your (Brian's)
11 statement."

12 You attach the 401 analysis and then the ARQ data
13 under the numbers 459 and 460, by which time you have
14 now got these, yes?

15 **A.** Yes.

16 **Q.** If we go to page 2, please. We can see that if we
17 scroll down a little bit, in an email that you wouldn't
18 have known about at the time, Brian Pinder of Fujitsu is
19 forwarding that email to Gareth Jenkins:

20 "... please see extract from a recent email below in
21 italics from Graham Ward ..."

22 Then he extracts your email of 10 March that we
23 looked at a moment ago:

24 "... regarding providing a statement about nil
25 transactions and online banking. If you're able to put
161

1 "Each transaction has associated with it a Response
2 Code Field ... In summary ..."

3 Then if we look, please, at Response Code, second
4 bullet point, value between 2 and 10 means declined by
5 bank; response code with a value greater than 10 implies
6 some sort of system failure.

7 Does that provide you with enough detail?

8 Can we look, please, at FUJ00122203. We can see
9 a little later on the 23rd a witness statement from
10 Mr Jenkins, and this is his initial draft being sent to
11 Neneh Lowther and Brian Pinder. Essentially -- I'm not
12 going to spend time looking now -- the explanation that
13 he provided in the email is substantially summarised or
14 replicated in that draft.

15 Can we go, please, to FUJ00152587. Look at page
16 four first, please. Scroll down, please, a little
17 further. Neneh Lowther on 22 March:

18 "Please see the draft witness statement for the
19 above transactions re nil values. Does this meet your
20 requirements?"

21 So that's sent to you 22 March at 1.01. If we
22 scroll up, please, stop there. You've read the witness
23 statement over the next hour and a bit, and you say:

24 "Layout is unfinished.

25 "As per my earlier email, the three spreadsheets
163

1 something together for us, I'd be grateful. If you send
2 it back I'll arrange for Neneh or Penny to write into
3 a statement for your signature."

4 Then he cuts in what you had said in your 10 March
5 email; can you see that?

6 **A.** Yeah.

7 **Q.** The important part is in bold in italics:

8 "Can you add an extra paragraph in your statement
9 explaining how online banking transactions are processed
10 and the data downloaded and how nil transactions can
11 occur."

12 So this is Mr Pinder asking Mr Jenkins to put
13 something together for him or for us, for Fujitsu, in
14 order to address that issue. If we go up to page 1,
15 please, scroll down, please, we can see Mr Jenkins'
16 reply:

17 "I've had a look at the ARQs and I think there is
18 sufficient info there to explain in most cases why there
19 are zero ... transactions. I suggest the as a brief
20 explanation.

21 "Three main reasons why zero transaction maybe
22 generated as part of the banking system.

23 "No financial effect;

24 "Declined by bank; or

25 "There has been some sort of system failure."
162

1 need to be produced as individual exhibits ..."

2 Then second line:

3 "I'm concerned at the words 'system failure', which
4 is also in an earlier line 'There has been some sort of
5 system failure' -- what does this mean exactly and is
6 there any indication of a system failure at this office
7 during the period in question?"

8 Then scroll up, please. 24 March, second draft
9 statement provided. Can we see what happened in between
10 those events by looking at FUJ00122203, and look at
11 page 2, please. Scroll down, please.

12 We see Neneh Lowther forwarding the email we've just
13 read on to Mr Jenkins:

14 "Please see reply from Graham. Ignore the bit about
15 exhibits. Please, can you look at his second paragraph
16 and advise with your comments."

17 That's the bit about system failures?

18 **A.** Yeah.

19 **Q.** If we scroll up a bit, please, Mr Jenkins replies:

20 "I'm not quite sure what his problem [that's your
21 problem] is with what I've said.

22 "Basically any value of response code that is
23 greater than 10 does imply some end-to-end system
24 failure. The actual value makes it clearer what exactly
25 the failure is and where it has been detected."
164

1 He gives some examples:
 2 "How do you want to play this? Do you want to add
 3 in specific text to the witness statement to cover these
 4 two codes or persuade POL [Post Office] that the generic
 5 statement is okay perhaps with some clearer words?"

6 Further up the page, please. She -- that's Neneh
 7 Lowther says that she's updated your witness
 8 statement -- Mr Jenkins' witness statement. She's not
 9 included the response below because she's not sure how
 10 to fit it in. Could you help:

11 "Also I believe that Graham Ward is thinking that
 12 'system failures' are drastic events."

13 Is that true?

14 A. Well, I just wanted them explained. I didn't know
 15 whether they were drastic or not. It's just from -- you
 16 know, and it's going back such a long time, it's so hard
 17 to sort of recall what I was thinking, but I'm guessing
 18 that the first statement wasn't clear to me at that time
 19 so I just wanted a bit more context around what he meant
 20 by system failures.

21 Q. Then scroll up, please. Mr Jenkins says that he's
 22 annotated it with revisions and doesn't feel able to
 23 include the last two paragraphs which may make the
 24 statement useless.

25 Can we now look, please, at the draft that he had
 165

1 point at the bottom of this page: response code with
 2 a value greater than 10 implies some sort of system
 3 failure.

4 A. Yeah --

5 Q. They're speaking about the same thing, aren't they?

6 A. Yeah, I can see that now, yeah.

7 Q. Then if we go forward to page 3, please. Those last two
 8 paragraphs, can you see the one beginning "No reason to
 9 believe that" and --

10 A. Yeah.

11 Q. -- "Any records to which I refer"?

12 A. Yeah.

13 Q. You remember he said he didn't feel that he was able to
 14 include those --

15 A. Yes, I do, yeah.

16 Q. -- and that they may make the statement useless?

17 A. Yes.

18 Q. What did you think the purpose of the inclusion of those
 19 two paragraphs was?

20 A. Well, these were two general paragraphs that the
 21 Criminal Law Team had asked to be included on statements
 22 that produced computer evidence. So it was, to my mind,
 23 important to have them in there to say that the system
 24 was operating properly and didn't effect the information
 25 held on it.

167

1 previously provided. Can we start, please, with
 2 FUJ00122204. Can we scroll down, please. He says:

3 "There are three main reasons why a zero value
 4 transaction may be generated ..."

5 System failure is the third of them:

6 "Such failures are normal occurrences."

7 He then sets out in summary terms in substance the
 8 same thing as he said in that email we looked at, about
 9 response codes; can you see that?

10 A. Yeah. Yes, I can, yeah.

11 Q. Would you agree that this is important information, that
 12 a zero value transaction may be shown or may be
 13 generated including by reason of a system failure --

14 A. Yes, it is important yeah.

15 Q. -- and that he is saying that such failures are normal
 16 occurrences --

17 A. Yeah.

18 Q. -- and he's saying that there's a system code that may
 19 identify them?

20 A. Yeah, I don't know that I was tying in the paragraphs
 21 beneath that with system failures. Maybe that's just my
 22 ignorance of not knowing exactly what nil transactions
 23 were.

24 Q. Doesn't this explain it? His numbered paragraph 3, some
 25 sort of system failure is linked to the third bullet
 166

1 Q. What did you take from the fact that he thought that
 2 these bits, which I think on the original were highlight
 3 in yellow weren't true, or he wasn't sure were true?

4 A. Well, that would have been a concern, obviously.

5 Q. Sorry?

6 A. That would have been a huge concern, if he --

7 Q. Why would it have been a huge concern?

8 A. Because if he can't say that the system is operating
 9 properly, then, you know, there's a problem, isn't
 10 there. Is this -- this wasn't the final statement, was
 11 it?

12 Q. No.

13 A. Oh, right.

14 Q. What we'll see happens is that he requests for them to
 15 be removed. They are removed and then, in the end
 16 draft, they come back in.

17 A. What the statement that was produced in evidence?

18 Q. Yes.

19 A. I don't know anything about that.

20 Q. He says:

21 "Can this be deleted? All I've done is interpret
 22 the data ..."

23 A. Yeah.

24 Q. "... in the spreadsheets you've emailed to me."

25 Would you have read this at the time, ie the
 168

1 attachment to this email?
 2 **A.** I would like to think I would, yeah.
 3 **Q.** This being the attachment to the email that you got?
 4 **A.** Yeah, I would have thought so, yeah.
 5 **Q.** Do you understand these or did you understand these two
 6 paragraphs to be statements speaking to the accuracy and
 7 reliability of Horizon generally or about a system that
 8 had been used to extract ARQ data?
 9 **A.** Horizon generally.
 10 **Q.** Hence your belief that these were significant
 11 omissions --
 12 **A.** Yeah.
 13 **Q.** -- or they would have been significant omissions?
 14 **A.** Yeah.
 15 **Q.** Can we look, please, at FUJ00122210. If we scroll down,
 16 on the 24th, ie the next day, you say -- sorry, scroll
 17 up, please:
 18 "This statement needs more work ..."
 19 You're emailing Neneh Lowther, Brian Pinder, Keith
 20 Baines, Paul Dawkins and Diane Matthews:
 21 "This statement needs more work. I've attached
 22 a suggested draft with number of comments (as mentioned
 23 previously I think the 'system failure normal
 24 occurrence' line is potentially very damaging)."
 25 Firstly, why did you think the "system failure
 169

1 he meant by "system failures".
 2 **Q.** That's not how this reads, is it?
 3 **A.** No, it's not.
 4 **Q.** You've gone straight to the effect of what he says,
 5 ie at causes us, the Post Office, damage.
 6 **A.** Yeah. I can see how it looks now.
 7 **Q.** Again, is this one of those examples of the way that you
 8 were thinking at the time: the important thing is to
 9 maintain, even in our prosecutions, the line that
 10 Horizon has integrity and produces reliable data?
 11 **A.** I wasn't trying to do that, no, I just obviously had
 12 a closed mind to the way I put things across but
 13 I really wasn't trying to -- you know, at the end of the
 14 day the truth is more important, and --
 15 **Q.** We don't see that kind of sentiment in any of your email
 16 exchanges, do we?
 17 **A.** Well, no, maybe not, but I know the person that I am.
 18 **Q.** I think we can delete "maybe" from that sentence and
 19 replace it with "definitely".
 20 **A.** Okay.
 21 **Q.** Can we look, please, at POL00047895. This is a copy of
 22 the marked-up witness statement, marked up by you,
 23 forwarded by Ms Lowther to Mr Jenkins. If we scroll
 24 down, please, and if we keep reading -- sorry, if we
 25 just go back to the top, please. Then scroll down
 171

1 normal occurrence" line was potentially very damaging?
 2 **A.** Well, just for the reason that I've said previously.
 3 I think I was just looking for a little bit -- it just
 4 wasn't clear to me exactly what he meant by it and that
 5 may just be my ignorance of not knowing about banking
 6 transactions and nil transactions but, you know, I'm
 7 just offering a comment. I'm not trying to lead him
 8 into saying anything in his statement, or anything like
 9 that. I was trying to be helpful but clearly I wasn't
 10 being. As I say, I can see here it says it may be worth
 11 someone from our team taking a statement directly from
 12 him.
 13 **Q.** Why did you think that was a good idea?
 14 **A.** I just thought it was getting a bit confusing with his
 15 statement and I just thought maybe it would be best for
 16 the Investigator dealing with the investigation to
 17 actually, you know, deal with it themselves.
 18 **Q.** Why would you be concerned if a person with expertise
 19 from Fujitsu is giving technical evidence, the effect of
 20 which was damaging? Wouldn't you be pleased that, as
 21 an Investigator or somebody associated with
 22 an investigation, the true position was being revealed?
 23 **A.** Well, yeah when you word it like that, yes, and I really
 24 wasn't trying to alter his statement or make him say
 25 anything; I was just wanting, you know, clarity on what
 170

1 slowly, please.
 2 Remaining in the statement, in the second paragraph,
 3 second line:
 4 "I was asked to produce information relating to
 5 'nil' transactions."
 6 Then if we go to the second page, please. Then the
 7 paragraph beginning "There are three", we see your
 8 comments:
 9 "There are three ..."
 10 Then you've added:
 11 "If these are the main three reasons, what are the
 12 rest?"
 13 That's in the nature of a question both in terms of
 14 the words used and the use of the question mark. So
 15 that's clarificatory, isn't it?
 16 **A.** Yeah.
 17 **Q.** Yes?
 18 **A.** Yes, sorry.
 19 **Q.** So you're genuinely trying to find something out, by the
 20 look of it there --
 21 **A.** Yeah.
 22 **Q.** -- why a zero transaction may be generated as part of
 23 the banking system. Then we see Mr Jenkins' own words:
 24 "Transaction has no financial effect. Transaction
 25 has been declined by the bank."
 172

1 Then we see system failure reason missing, don't we;
 2 you've deleted it, haven't you?
 3 **A.** No, I would not have deleted anything at all.
 4 **Q.** Well, why doesn't it appear here?
 5 **A.** I don't know.
 6 **Q.** You've typed over it:
 7 "This is a really poor choice of words which seems
 8 to accept that failures in the system are normal and
 9 therefore may well support the postmasters' claim that
 10 the system is to blame for losses!!!!"
 11 **A.** No, I would not have typed over anything or deleted
 12 anything at all. I just know the person that I am and
 13 I wouldn't have done that.
 14 **Q.** Well, you were concerned, we've seen, at the emails that
 15 preceded this, with what Mr Jenkins was proposing to say
 16 about system failures, weren't you?
 17 **A.** Yeah, I was concerned, yeah. I just wanted clarity on
 18 it, as I said, but I would not have typed over it or
 19 deleted it.
 20 **Q.** This is the attachment to an email that you sent to
 21 Neneh Lowther, who, in turn, sent it on to Mr Jenkins?
 22 **A.** Right.
 23 **Q.** Do you know where these words have come from, then?
 24 **A.** Well, I'm sure I've -- I must have typed the words,
 25 yeah. But I wouldn't have typed over "system failure".

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1 **SIR WYN WILLIAMS:** All right.
 2 **MR BEER:** Can we move lastly, conscious of the time, to
 3 FUJ00122217. Now, Mr Jenkins is liaising with you
 4 directly:
 5 "Graham, I've added some further annotations to your
 6 annotations. Does this move us forward?"
 7 We're now on 28 March, if we scroll down. So the
 8 email I was talking about that attached the witness
 9 statement we were just looking at is the one at the
 10 bottom of the page here, 24 March 2006, 11.37:
 11 "This statement needs more work. I've attached
 12 a suggested draft."
 13 That the one we're talking about.
 14 **A.** Yes.
 15 **Q.** Then Neneh Lowther sent it to Gareth Jenkins. Then
 16 further up, he replies:
 17 "I've added some further annotations to your
 18 annotations. Does this move us forwards?"
 19 Can we look at his attachment, please. FUJ00122218.
 20 This is Mr Jenkins' further draft. Scroll down, please.
 21 That big paragraph at the foot of the page, three lines
 22 in:
 23 "There are three reasons why a zero value
 24 transaction may be generated as part of the banking
 25 system."

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1 **Q.** Okay, if we move on. Next page, please. We see that
 2 the paragraphs that were previously in yellow, which
 3 Mr Jenkins said that he didn't feel that he could say,
 4 have been deleted. Did you delete those then?
 5 **A.** No. I can't explain it at all. I would not have
 6 written over or deleted anything from anybody's
 7 statement. Absolutely not.
 8 **Q.** Can we move to FUJ00122217.
 9 **SIR WYN WILLIAMS:** Well, before we do, since I think you've
 10 just accepted that you attached this witness statement
 11 to an email you sent, can you explain where this witness
 12 statement came from, so as to enable you to attach it to
 13 an email?
 14 **A.** No, I'm sorry, sir. I just cannot remember, you know,
 15 this at all.
 16 **SIR WYN WILLIAMS:** Well, people's memory, of course, is for
 17 them to tell me about, but this is a pretty memorable
 18 event, is it not? This is you really becoming involved
 19 in an important statement in relation to the prosecution
 20 of someone in a way that you'd never done before, as
 21 I've understood it. So can you try and rack your
 22 memory, please, as to how this statement came to be
 23 attached to an email you sent.
 24 **A.** Honestly, I just can't explain it at all, no. I really
 25 can't.

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1 1 and 2 as normal, then what I've suggested are your
 2 words:
 3 "This a really poor choice of words which seems to
 4 accept that failures in the system are normal
 5 [et cetera]."
 6 Mr Jenkins replies:
 7 "Please can you suggest something better then? What
 8 we have here are genuine failures of the end-to-end
 9 system which are not part of operation but are
 10 anticipated and the system is designed to cope with
 11 them. Some such failures could be engineered as part of
 12 a malicious attack ... In all cases the system is
 13 designed to identify such failures and handle them in
 14 such a way that the customer, the postmaster, Post
 15 Office Limited and the FIs [I think that means
 16 Investigators] are all clear as to the status of the
 17 transaction and any necessary financial reconciliation
 18 takes place. I guess one option is to delete the
 19 paragraph since it is purely an introduction to the
 20 following more detailed description."
 21 Then that remains.
 22 Then if we go to the last page, if we keep
 23 scrolling, then the paragraphs remain deleted about the
 24 normal operation of the computer system.
 25 **A.** Yeah.

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1 Q. FUJ00152587. Later in the day on the 28th, you say to
 2 Mr Pinder, copying Ms Lowther and Mr Jenkins in:
 3 "I do not understand why this statement ... is
 4 taking so long ... I appreciate it is slightly unusual,
 5 but I do not understand the confusion as I thought I'd
 6 made our requirements clear."
 7 Was it for you, as an Investigator or Manager of
 8 Investigators, to require what was included in a witness
 9 statement?
 10 A. No, it wasn't. Not in my role as Casework Manager, no.
 11 Q. "Unfortunately, Gareth's annotations do not take us
 12 further forward (I'm sure this is not Gareth's fault)."
 13 We can skip the next paragraph and then go to the
 14 next paragraph:
 15 "As already stated, we urgently need a statement
 16 producing these spreadsheets ... under what
 17 circumstances 'nil' transactions occur and in particular
 18 how the 'nil' transactions at Gaerwen occurred ... The
 19 same statement needs to include a paragraph which states
 20 that there is no evidence of a system error at Gaerwen
 21 (assuming this is the case) in relation to the 'Nil'
 22 transactions ... We do not need to mention 'system
 23 failures being normal occurrences' if there is no
 24 evidence of such a problem at the office."
 25 Why were you so concerned about this?
 177

1 which seems to have occurred on 6 April 2006, in order
 2 to "record the statement". Did you have any involvement
 3 in that?
 4 A. No, I don't -- no.
 5 Q. Do you know what happened on that occasion?
 6 A. No, I've got no idea.
 7 Q. Do you know why it was thought necessary to dispatch
 8 somebody to Mr Jenkins in order to "record" a statement
 9 from him, given what we've seen has transpired already?
 10 A. No, I don't think -- no, I don't, and I think I was the
 11 one that suggested that somebody takes a statement, just
 12 because it was -- it was getting confusing, clearly.
 13 So, yeah, I made the suggestion because I wanted to get
 14 the statement right.
 15 Q. Can we look at FUJ00122237. This is the final witness
 16 statement, dated 6 April 2006. If we scroll down,
 17 please, we can see some mention of response codes there,
 18 yes?
 19 A. Yes.
 20 Q. We don't see any mention of response codes 10 and above
 21 being equated to system faults, do we?
 22 A. No.
 23 Q. Do you know why that's disappeared?
 24 A. I've got no idea, no.
 25 Q. Keep scrolling -- scroll back up. We then see:
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1 A. Yeah, it's hard for me to sort of take myself back to
 2 2006. I really don't know.
 3 Q. Is it because you didn't want anyone knowing that that
 4 there might be a system fault with Horizon?
 5 A. No.
 6 Q. You wanted that edited out of evidence being presented
 7 to a court?
 8 A. No, I didn't want anything edited out at all; I just
 9 wanted to make sure the statement was clear and I've
 10 just gone about it the wrong way.
 11 Q. But you accept the effect of your interventions
 12 individually and taken together, have, as their object,
 13 the editing of a witness statement to remove mention of
 14 system failures in Horizon?
 15 A. No, because I haven't seen the final statement.
 16 Q. We're going to come to the final statement in a moment
 17 but, so far, do you accept what I have suggested: the
 18 effect of what you were asking for is to edit out of
 19 a statement to be presented to court any mention of
 20 a system failure in Horizon?
 21 A. I don't accept that. I didn't intend that to be the
 22 case, no. No. I can see that's how it looks but that
 23 wouldn't have been my intention at all.
 24 Q. It seems that Mr Pinder then spoke with Ms Matthews and
 25 arranged for her to speak with Mr Jenkins personally,
 178

1 "... no reason to believe the statement is
 2 inaccurate because of improper computer use."
 3 Then over the page, please. The second bit of the
 4 statement -- the standard words not appearing.
 5 A. Yeah.
 6 Q. Do you know how the final statement came to not include
 7 any mention of system failures?
 8 A. No, I don't.
 9 Q. Do you know how the final statement came not to mention
 10 any reference to the fault codes, response codes that
 11 equated to system failures?
 12 A. No, I don't, no.
 13 Q. Do you know how it came to pass that half of the
 14 standard wording, as you've called it, came to be
 15 included in the final version when Mr Jenkins had
 16 earlier said that he couldn't include either of those
 17 paragraphs because he wasn't sure they were true?
 18 A. No, I don't have any idea at all.
 19 MR BEER: Mr Ward. Thank you very much.
 20 I'm sorry, sir, I've gone ten minutes over time.
 21 SIR WYN WILLIAMS: Well, we'll afford to the representatives
 22 of the subpostmasters an extra ten minutes so I'll sit
 23 until somewhere between 4.40 and to 4.45, if necessary.
 24 But they'll have to sort out between them how they share
 25 out that time.
 180

1 **MR BEER:** Thank you, I think Ms Page first, then I think the
2 Huddells group and then -- they're speaking amongst
3 themselves, sir, which you can't see --

4 **SIR WYN WILLIAMS:** Well, of course. Please do.

5 **MR BEER:** -- but they're eating into their time.

6 **Questioned by MS PAGE**

7 **MS PAGE:** I act for Mr Castleton, amongst other
8 subpostmasters.

9 In your witness statement at paragraph 62 you said:
10 "I don't personally recall being concerned that
11 Mr Castleton's claim posed a challenge to the integrity
12 of the Horizon system, as I don't recall that it was
13 considered a significant issue at that time."

14 Is that really true, Mr Ward?

15 **A.** Yes, that's what I believe at the time, absolutely.

16 **Q.** Do you remember you were being asked questions about
17 that meeting in December 2005, that you said was
18 unusual?

19 **A.** Yeah.

20 **Q.** Do you really not recall that meeting, Mr Ward?

21 **A.** No, honestly I don't recall it. It was 2005.

22 **Q.** That meeting was all about challenges to the Horizon
23 system?

24 **A.** But it does say within the notes that there weren't many
25 challenges.

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1 25 July [from the solicitors]."

2 Then, if we go down a little, you say this:

3 "Given this is a 'test' case and that the integrity
4 of the Horizon system is being challenged, my own
5 opinion is that this exercise should be completed by
6 an 'expert' from Fujitsu."

7 You go on to say that that would be time consuming
8 and that it would need to be methodically and carefully
9 done, and you say:

10 "It is important that we complete the analysis and
11 respond formally to the points raised as soon as
12 possible ..."

13 Then you go on to say:

14 "My first question is:

15 "Is this is an exercise that Fujitsu could
16 undertake, possibly by Gareth ..."

17 So that suggests Mr Jenkins, doesn't it?

18 **A.** Yes, it does, yes.

19 **Q.** "... who would presumably have a thorough understanding
20 of the figures recorded on both the transaction logs and
21 the figures on an office cash account?

22 "If the answer is yes, how soon can it be
23 performed?"

24 Then you ask what are the costs involved.

25 Thank you. That can come down.

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1 **Q.** One of them was Mr Castleton. It must have been a case
2 that was up for discussion at that meeting, Mr Ward?

3 **A.** Yeah, well, honestly, I don't have any recollection of
4 that meeting, I'm sorry.

5 **Q.** Can I have, please, FUJ00152290 on the screen, please.
6 If we go down to page 3, please. If we just scroll
7 a little bit up, we can see this is an email from you to
8 Brian Pinder, 28 July, do you see that --

9 **A.** Yes.

10 **Q.** -- copied to Peter Sewell and the subject is "Castleton:
11 Transaction logs":

12 "Brian [you say]

13 "Stephen Dilley (representing the Post Office) is
14 asking if it is possible that someone undertakes
15 an analysis of the figures recorded on the transaction
16 logs supplied by Fujitsu against the figures on the
17 complete cash account for CAP 42."

18 So that's just cash account period, yeah. Then he
19 gives the dates '04;

20 "It appears that the solicitors for Castleton are
21 saying that they've compared the transaction logs with
22 the cash accounts for week 42 themselves (just for
23 an initial analysis) and that they don't match. They
24 conclude that Horizon is therefore only recording half
25 the transaction. I've attached below the letter dated

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1 It's quite clear from that, isn't it, Mr Ward, that
2 you knew full well that this was a case that challenged
3 the integrity of Horizon?

4 **A.** Well, that was a civil case, yeah. It was one of the
5 first that I'd been aware of and I was just acting as
6 the Casework Manager in charge of the ARQ process.

7 **Q.** Mr Ward, you said in your witness statement that you
8 didn't think that the *Castleton* claim posed a challenge
9 to the integrity of the Horizon system.

10 **A.** I said what, sorry?

11 **Q.** I just read it out to you a few moments ago. You said
12 that you didn't think that it posed a challenge to the
13 integrity of the Horizon system and you didn't think it
14 was a significant issue.

15 **A.** Can we bring that up again, please?

16 **Q.** What the email --

17 **A.** Yeah.

18 **Q.** -- or the statement?

19 **A.** No, the actual email that you're saying I've -- where
20 I've said that.

21 **Q.** Certainly, we can have it again. It's --

22 **SIR WYN WILLIAMS:** I think you're at cross purposes.

23 I think Ms Page's point is that, in your witness
24 statement, you are saying that you weren't aware that
25 the *Castleton* case was particularly significant --

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1 that's my paraphrase -- and yet you're saying the
 2 opposite, is her contention, in that email. So which
 3 would you like to see: the witness statement or the
 4 email?

5 **A.** The email please, sir.

6 **SIR WYN WILLIAMS:** Right.

7 **MS PAGE:** Thank you that's FUJ00152290 -- oh, yes, here we
 8 go -- and it's page 3. If we zoom in on the paragraph
 9 that says:
 10 "Given this is a 'test' case and that the integrity
 11 of the Horizon system is being challenged, my own
 12 opinion is [X, Y and Z]."

13 Does that not make it clear that you understood that
 14 this was a test case challenging the integrity of the
 15 Horizon system?

16 **A.** Yes, it does.

17 **Q.** Indeed, that's why you thought it necessary to involve
 18 Gareth Jenkins, the distinguished engineer --

19 **A.** Yeah, I'm suggesting that that might be the case, yes.

20 **Q.** -- rather than just asking for a statement from Penny
 21 Thomas or Andy Dunks, one of the usual characters. You
 22 want it to be a proper expert who responds to this,
 23 don't you?

24 **A.** Well, Penny Thomas and Andy Dunks used to provide the
 25 standard ARQ data and that -- and Mr Jenkins used to

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1 **A.** I should certainly have highlighted it, yeah. I should
 2 have escalated it up, yeah.

3 **Q.** Did you ask any questions about known faults, either of
 4 Fujitsu or anyone else?

5 **A.** I can't recall, no. I really can't recall. It's going
 6 back so far.

7 **Q.** Mr Ward, did you know anything about the Known Error
 8 Log?

9 **A.** No, not at all.

10 **MS PAGE:** Thank you. Those are my questions.

11 **SIR WYN WILLIAMS:** Ms Page, just so I'm clear, part of
 12 Mr Ward's witness statement that you want me to look at
 13 in this context of the email is the last sentence of
 14 paragraph 62; is that right?

15 **MS PAGE:** That's right, sir. Thank you.

16 **SIR WYN WILLIAMS:** Thanks. Who is next?

17 **MS PATRICK:** Sir, it's me, Ms Patrick.

18 **Questioned by MS PATRICK**

19 **SIR WYN WILLIAMS:** Yes.

20 **MS PATRICK:** Good afternoon, Mr Ward. My name is Angela
 21 Patrick, I represent, with Mr Moloney, a number of
 22 subpostmasters who were prosecuted, convicted and have
 23 since had their convictions overturned.
 24 I want to look at one topic and it's going back to
 25 something that Mr Beer asked you about a lot. If you

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1 provide more detailed evidence on cases. So, again, I'm
 2 just trying to be helpful in helping Mr Dilley get the
 3 information that he'd asked for.

4 **Q.** You knew this was a case about the integrity of the
 5 Horizon system that was being closely watched across the
 6 business, didn't you, Mr Ward?

7 **A.** No, I didn't know anything about the case at all,
 8 really. All I was being doing was being asked to get
 9 the ARQ data and I was just trying to help. It really
 10 wasn't a significant case, as far as I was concerned.
 11 It was one of the first cases I'd heard about and I was
 12 just trying to help, that was all.

13 **Q.** Mr Ward, the report was duly produced. I won't take you
 14 to it to save time, I'll hope that you'll take it from
 15 me that, on the first page of that report, which was
 16 sent to you in close to final form, there is a reference
 17 to a known fault in the Horizon system.

18 Now, you were the liaison point for hundreds of
 19 requests for Horizon data. Had you ever heard of "known
 20 faults"?

21 **A.** No, I hadn't, no.

22 **Q.** The fact that there were known faults in the system
 23 suggests that the process you were responsible for
 24 should have included searching for relevant known
 25 faults, should it not?

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1 remember this morning, he asked you about a document,
 2 the 2007 policy which covered prosecution support.

3 **A.** Mm-hm.

4 **Q.** We can bring it up but let's try not to, to start with.
 5 I just want to refresh your memory about that document.
 6 I think you agreed that that document that Mr Beer
 7 showed you, the document behind prosecution support that
 8 Fujitsu has provided to the Post Office, it was
 9 an important document, wasn't it?

10 **A.** It was.

11 **Q.** It dealt with things like the obtaining of the message
 12 store by Fujitsu and the events log from the message
 13 store, and you discussed this morning two different
 14 kinds of events with Mr Beer, didn't you?

15 **A.** Yeah.

16 **Q.** I'll do this very quickly but I think you looked at
 17 knowing that an ARQ request would cover the obtaining of
 18 some information from the message store, wouldn't it?

19 **A.** So my understanding of the ARQ request was that we would
 20 get transaction and event logs from Fujitsu and if we
 21 asked for a supporting statement they would provide that
 22 statement and provide the standard paragraphs at the
 23 end, attesting to the sort of system working correctly.

24 **Q.** If we can just refresh your memory, it might help to get
 25 where I'm coming from. If we can look at the 2007

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1 policy very, very briefly. Can we look at FUJ00122366.
2 I'm looking at page 17. At the bottom of page 17,
3 please. We see there "Generate message store"; can you
4 see that?

5 **A.** Yes.

6 **Q.** "A message store of selected files shall be initiated on
7 the operator's local machine using the files extracted
8 to the audit server."

9 Then here's what happens next with the message
10 store:

11 "Once the message store has been successful
12 generated, the RQuery tool shall be used to select the
13 files as per the search criteria set out in the ARQ."

14 So that sounds very technical but do you accept it
15 suggests that search criteria exist in the ARQ and what
16 you get from the message store is what's set out in the
17 search criteria? You're nodding, Mr Ward: do you agree?

18 **A.** Yes, I would agree, yes.

19 **Q.** So you don't get the whole of the message store, you get
20 what you asked for in the ARQ?

21 **A.** Yeah.

22 **Q.** Thank you.

23 You can just scan through, since we've got this
24 open, just so we're being absolutely clear we're all on
25 the same page, if we can through the next page, page 18,
189

1 the document management team. It's FUJ00152189.

2 I apologise, sir, for the delay. That's my note.

3 **SIR WYN WILLIAMS:** Oh, no, that's all right.

4 **MS PATRICK:** Thank you. If we zoom in a little, we can see
5 this a document headed 11 February 2002. Now, I'm just
6 going to take this slightly quickly. It's headed, you
7 remember that date, 11 February --

8 **A.** Yeah.

9 **Q.** -- which I mixed up, thinking it was November.

10 "Network Banking Management of Prosecution Support."

11 Now, I'm going to deal with this quite quickly, if
12 I can. You see on the front page there it says,
13 "Draft"?

14 **A.** Yeah.

15 **Q.** If we can go to page 1, a little bit further down that
16 we can see here, we see you under "Reviewed by, "Post
17 Office -- Graham Ward"; is that likely to be you?

18 **A.** Yes, that's me.

19 **Q.** Can we turn to page 2, please, and we scroll a little
20 bit, yeah, we can see just about see you there on the
21 page, approval authority is Mr Ward, "Post Office
22 Limited Internal Crime Policy and Standards Manager".

23 **A.** Yeah.

24 **Q.** Is it likely at this point, February 2002, you were
25 still in that role?

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1 we can see different kinds of prosecution support, which
2 you went through with Mr Beer this morning, included
3 Horizon Helpdesk logs, non-polling reports. Next page
4 you see fault logs, and so on, witness statements of
5 fact, and then, again, expert evidence.

6 **A.** Yes.

7 **Q.** That was all dealt with this morning.

8 **A.** Yeah.

9 **Q.** Now, I want to look at the history of this document
10 a little. So if we can go to page 2, I'd be very
11 grateful. We can see there, if we scroll down a little,
12 we can see reviewers' names and, if we scroll a little
13 bit further, you don't appear there but, if we scroll
14 a little bit further up, we can see the history in the
15 box at the top of the page, and we can see the first
16 draft of this document, version 0.1 dates from --
17 I think the dating that Fujitsu use, I think it's
18 2 November --

19 **A.** Okay.

20 **Q.** -- 2002, but I'm sure somebody will correct me if I'm
21 wrong.

22 Oh, no, I think it's 11 February at this point.
23 11 February. If we can bring up a document, I'd be
24 grateful. FUJ00159189, please.

25 I think I've got the wrong reference, I apologise to
190

1 **A.** Yeah, if that's what it says, yeah.

2 **Q.** Right. Although this refers to Network Banking, if we
3 can scroll down to page 7 -- and I won't read this all
4 out but if we scroll down a little bit further on the
5 page, I'd be grateful -- it deals with there in some
6 detail -- so I won't read it out, somebody will correct
7 me if I'm wrong -- there being an arrangement where, at
8 this time, for general Litigation Support, there wasn't
9 a contractual arrangement in place; it was being done
10 subject to a without-prejudice agreement but there were
11 arrangements in the contract for network banking.

12 **A.** Okay.

13 **Q.** So if we scroll a little bit further, we can go to
14 page 13. We see you again here named as the point of
15 contact --

16 **A.** Yeah.

17 **Q.** -- in 2002. Likely that you were expected to be the
18 point of contact in relation to requests for data, then?

19 **A.** That would seem so, yeah.

20 **Q.** If we go to page 16, you see, taking this very quickly,
21 a flowchart very similar to the one that Mr Beer took
22 you to this morning?

23 **A.** Yeah.

24 **Q.** Again, message store on the left; Helpdesk, polling logs
25 and fault log review on the right.

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1 A. Yeah.
 2 Q. Can you see that there?
 3 A. I can, yeah.
 4 Q. I think we can agree this looks like an earlier
 5 iteration --
 6 A. Yeah.
 7 Q. -- an earlier draft --
 8 A. It does, yeah.
 9 Q. -- of the document from today. I won't scan through the
 10 rest, we'll go through them in some detail in a minute.
 11 I want to look at two things in detail. Can we look
 12 down at page 22. We see this is the section that deals
 13 with expert witness and you can scroll down, you can see
 14 one of the things about the middle of the box there, you
 15 can see there's a list:
 16 "Expert witnesses could be called upon to provide
 17 for example ..."
 18 One of the things there, if you can see the second
 19 one from the bottom, one of the things the expert
 20 witness was going to do in 2002 was the:
 21 "Provision of specific Tivoli and other system
 22 security event files ..."
 23 Can you see that, Mr Ward?
 24 A. I can see that.
 25 Q. Could this explain why you were familiar with Tivoli

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1 "Any relevant PinICLs identified in PowerHelp logs
 2 will be reviewed through PinICL Client to ensure that
 3 any recorded faults would not hinder the outlets
 4 performance or otherwise affect the integrity of audit
 5 archive from which the record queries are extracted."
 6 Then it says:
 7 "The PinICL log will detail the error relating to
 8 the site, equipment and/or service in question."
 9 Were you aware at that point what a PinICL was?
 10 A. No, I'd had no idea.
 11 Q. But being involved in this drafting exercise, do you
 12 accept you would have read the document?
 13 A. Yeah, yes. I must have read the document but I don't
 14 think I would have understood most of it.
 15 Q. Now:
 16 "The PinICL log will detail the error relating to
 17 the site, equipment or the service in question."
 18 Now, the PinICL log, does that sound important to
 19 the understanding of faults in the system?
 20 A. It would sound so, yeah. It would sound as though it's
 21 important, yeah.
 22 Q. Can you recall whether, when you were involved in this
 23 exercise, you asked for more information about what the
 24 PinICL log was?
 25 A. No, I don't. I don't recall.

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1 events later in 2005: you'd been involved in this
 2 drafting exercise?
 3 A. It might be where I'd heard it, yeah. I really can't
 4 remember now.
 5 Q. If we scroll -- you don't have to scroll, you can see
 6 it. If we go to the very bottom part of that draft, I'm
 7 looking at the last paragraph, it says:
 8 "Support in excess of 15 days shall be considered on
 9 the production of an appropriate change request."
 10 So they're essentially saying, "We'll give you up to
 11 15 days' expert support but only if you give us a change
 12 request"; is that fair, Mr Ward?
 13 A. That's what it says.
 14 Q. Again, if you scroll down to 8.2 at the bottom, you had
 15 15 days' on a change request, again, that's for experts
 16 going to court; can you see that there, Mr Ward?
 17 A. Yes, I can see that.
 18 Q. Now, if we scroll back up to page 18, I want to look at
 19 the analysis of faults, previously. If we scroll to the
 20 bottom of the page, and I can ask you to look at 7.2.3
 21 and, if you can bear in mind we just looked at 8.1, if
 22 you remember --
 23 A. Yeah.
 24 Q. -- bear in mind 8.1 and now 7.2.3, and you can see there
 25 "Analysis of event and fault logs", and you can see:

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1 Q. I'm going to move on from this draft. I want to see
 2 where we go next. Can we look at FUJ00152501. We can
 3 zoom in a little because it's very small writing and,
 4 first of all, I want to look at the box at the very top.
 5 You can see there it's a "Quality Review Comment Sheet"
 6 and it's an ICL Pathway document. I want you to ignore
 7 the date on the right-hand side for now and look at the
 8 boxes. It's referring to this document, the document we
 9 looked at, the draft, Network Banking Prosecution
 10 Support, and you can see the date, 11 February 2002
 11 matches; can you see that there on the left, Mr Ward?
 12 A. Yeah, I do, yeah.
 13 Q. On the right, it gives a deadline for comments by
 14 22 February 2002, and we can see below there the
 15 reviewer's name in section B; can you see that, Mr Ward?
 16 A. Yes, I can.
 17 Q. The name is Jan Holmes?
 18 A. Yes.
 19 Q. Do you remember Jan Holmes?
 20 A. I remember the name, yeah. But I don't -- can't recall
 21 much else about him, I'm afraid, it's -- well, what's it
 22 22 years ago?
 23 Q. Well, okay. You can see on the right-hand side his
 24 review was on 12 February. I'd like to look at some of
 25 his comments, if you don't mind. If we can scroll down

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1 a little, so we can see box C, I'd be very grateful.
 2 Thank you.
 3 Now, if we can look at page 2 of this document, so
 4 going over the page. We see these are his comments. If
 5 we can see, first of all, I'd like to look at the box
 6 which is the reference to 7.2.3. If you remember,
 7 I asked you to remember 7.2.3, that was the section of
 8 the document which dealt with fault analysis.
 9 **A.** Yeah.
 10 **Q.** He says:
 11 "This is lining yourself up for a heap of work.
 12 Better I would have thought to analyse the Tivoli Events
 13 Logs only."
 14 Now, can you see that there?
 15 **A.** I can see that.
 16 **Q.** Did you think "Oh, let's not bother with what you're
 17 proposing, shall we just look at Tivoli events"; is that
 18 the effect of what he's saying?
 19 **A.** Yeah, I mean, this is the first time I've seen this.
 20 I mean, this document was sent to me in the bundle last
 21 Friday.
 22 **Q.** We'll come to that, I want to ask you a question about
 23 whether you saw it or didn't?
 24 **A.** All right.
 25 **Q.** He's saying "Let's do Tivoli events when we look at
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1 **Q.** Another Graham. There wasn't another Graham in the
 2 request was there?
 3 **A.** No, it's just me.
 4 **Q.** So:
 5 "Graham, on 007007 Witness Statement, Tony Utting
 6 ..."
 7 Tony Utting, at this point, would he have been your
 8 boss or somebody else in the Security Team?
 9 **A.** No, I think it would have been Tony Utting, yeah, or may
 10 have been Ray Pratt at that time, I can't remember.
 11 **Q.** Yeah:
 12 "... Tony Utting advised me to remove any parts of
 13 the Statement that I did not personally know.
 14 Specifically it was some historical stuff about what
 15 existed in the Post Offices ... Have you got this in
 16 your standard WS or is it removed?"
 17 Now, this is an aside from the draft. I just want
 18 to ask you about that comment. This refers to some Post
 19 Office advice to Fujitsu to remove anything from
 20 a witness statement that they did not personally know.
 21 Did you think that was good advice?
 22 **A.** Yeah.
 23 **Q.** Advice that you'd have adopted when you were in the Case
 24 Manager role?
 25 **A.** Yeah, absolutely.
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1 fault analysis", isn't he?
 2 **A.** That's what he's saying, yeah.
 3 **Q.** Let's not leave it to the special expert to look at
 4 Tivoli events, let's do it at this stage, at 7.2.3,
 5 isn't he?
 6 **A.** Yes.
 7 **Q.** Does it look like he's trying to save Fujitsu some work
 8 in this comment?
 9 **A.** Well, that's what it looks like to me, yeah.
 10 **Q.** If you'd read it, would that be a cause of concern for
 11 you, if you were the reviewer for Post Office?
 12 **A.** Yeah, it should be, yeah.
 13 **Q.** It's clear on this, in any event, on fault analysis,
 14 that, in 2002, Mr Holmes thinks Tivoli events are
 15 important, doesn't he?
 16 **A.** Yeah, that's what he's saying, yeah.
 17 **Q.** Okay, and if we scroll down a little, I want to look at
 18 his comment two down on 7.2.4.1. He says:
 19 "Graham ..."
 20 Now, you're the reviewer here -- I'm going to look
 21 at the comment itself in a minute. You're the reviewer
 22 for the Post Office. Is it likely these comments were
 23 being directed to you?
 24 **A.** Well, I would imagine they must be, yeah. I didn't see
 25 any other -- well, there was --
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1 **Q.** If there were any later statements provided from Fujitsu
 2 under your watch, would you have expected the person
 3 giving the statement to say if it included anything of
 4 which they did not have personal knowledge?
 5 **A.** No, they should -- anything in their statement should be
 6 their own personal knowledge, yeah.
 7 **Q.** If they were relying on something somebody else had told
 8 them, somebody else's information, they'd said, you
 9 know, "I got Dave to tell me about this thing", would
 10 you expect that to be in the witness statement, who told
 11 them the thing they were relying on?
 12 **A.** Well, they should -- yeah, they should include that,
 13 yeah.
 14 **Q.** Okay, that's the side point. If we can move down
 15 a little bit, can we look down two boxes to what he says
 16 about 8.1 and the expert witness.
 17 If you remember, they were talking about a 15-day
 18 sort of cap but only when there was a change request.
 19 He says:
 20 "Graham, I think if I were doing this, I would
 21 separate the work into that which you could reasonably
 22 fix a duration for and that which you could not. For
 23 the fixed duration ... you're on fairly safe ground when
 24 it comes to turnaround ... and you can be more certain
 25 about what you can achieve. I wouldn't have any
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1 inclusive time to deal with that over which you have no
 2 control, ie Expert Witness stuff. My preference would
 3 be to declare all this outside the normal process and
 4 subject to a CR [I presume change request] on
 5 a case-by-case basis."
 6 Then below he says the same for an expert going to
 7 court.
 8 Now, Graham, reading that, is that a comment you
 9 think is directed to you, or to somebody else?
 10 **A.** Yeah, I think it must have been directed to me, yeah.
 11 **Q.** Can you remember these comments being sent to you?
 12 **A.** No, not at all. I mean -- no, it's 20-odd -- 20-plus
 13 years ago. I can't remember, I'm sorry.
 14 **Q.** Just for a bit of background, at this point in 2002, you
 15 know you say you can vaguely remember Mr Holmes. Do you
 16 remember ever being told that he'd been involved in
 17 an EPOSS taskforce looking at large numbers of PinICLs
 18 and problems in the Horizon EPOSS system --
 19 **A.** No.
 20 **Q.** -- before 1999 --
 21 **A.** No.
 22 **Q.** -- because that would have been important information
 23 for you to have, if you were negotiating policy on how
 24 Fujitsu would look at faults in the system?
 25 **A.** I don't ever recall negotiating on policy. I know I've
 201

1 authority any more, you're "Optional Review/Issued for
 2 Information"; can you see that?
 3 **A.** I can see that, yes.
 4 **Q.** In the names above, we see "Jan Holmes". Can you see
 5 any other people there from the Post Office?
 6 **A.** There's no names from the Post Office that I can see,
 7 no.
 8 **Q.** Okay. We see an asterisk next to your name, and the
 9 asterisk designates you returned comments; can you
 10 remember if you returned comments?
 11 **A.** If it says I did, then I would have done, yeah.
 12 **Q.** Okay. Now, I'm trying to save time as much as we
 13 possibly can. Can we go to page 18, please -- sorry
 14 page 20, I apologise.
 15 If we scroll to the bottom, we can see 7.2.3, the
 16 approved version. We see the reference to PinICLs but
 17 there's no reference to Tivoli events, is there?
 18 **A.** No.
 19 **Q.** Okay, and if we scroll to page 23 and scroll a little
 20 bit further down, we see the "Expert Witness Statement"
 21 section. You see there again, Tivoli events and other
 22 security event files stay with the expert; can you see
 23 that, Mr Ward?
 24 **A.** I can see that, yeah.
 25 **Q.** Again, at the bottom, the very bottom of the page, we
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1 been sent as a reviewer here but I was new into the
 2 internal crime policy role.
 3 **Q.** We looked at that draft: you were listed as the approval
 4 authority, weren't you?
 5 **A.** I was, yeah, and I'm surprised at being the approval
 6 authority, but if that's what it says.
 7 **Q.** Would you have had the authority at that point, in that
 8 role you were in in 2002, to approve policy?
 9 **A.** I don't think I would have had the approval authority at
 10 the grade I was working at, no.
 11 **Q.** This might help. If we move to the next draft, it's --
 12 **SIR WYN WILLIAMS:** Ms Patrick, where are we going? We're
 13 now in overtime, so to speak.
 14 **MS PATRICK:** Sir, I'm afraid that I'd said 20 minutes.
 15 I think I've had 10 so far.
 16 **SIR WYN WILLIAMS:** No, no, you've had a bit longer, but who
 17 is coming after you? I said I was finishing, that's the
 18 point.
 19 **MS PATRICK:** I apologise, sir. Essentially, we can move on
 20 to the final draft.
 21 **SIR WYN WILLIAMS:** Right.
 22 **MS PATRICK:** The final draft, if we move to FUJ00152205.
 23 I apologise, sir.
 24 If we scroll to page 2, we see the date at the top
 25 is November 2002. We see there you aren't an approval
 202

1 see the 15 days goes and, instead, it's to be agreed on
 2 a case-by-case basis and dealt with in accordance with
 3 the change control procedure.
 4 **A.** Yes.
 5 **Q.** So it looks as though Mr Holmes' recommendation has been
 6 accepted?
 7 **A.** Accepted, yeah.
 8 **Q.** It will be a case-by-case basis?
 9 **A.** Yeah.
 10 **Q.** Now, I just want to look back at the 2007 policy, very
 11 briefly.
 12 **SIR WYN WILLIAMS:** In one minute, Ms Patrick.
 13 **MS PATRICK:** Sir, if we can look at page 19, please.
 14 Can you see at the top of page 19, 7.2.3?
 15 **A.** I'm not there yet. Yes.
 16 **Q.** So this is still the 2002 document. I'm sorry, it's
 17 FUJ00122366. If we don't need to bring it up, Mr Ward,
 18 we can look at it. I'm looking at it now. It says:
 19 "If requested, all PowerHelp calls will be reviewed
 20 to identify any recorded faults that might affect the
 21 integrity or admissibility of the audit archive from
 22 which ARQs are extracted."
 23 The reference to PinICLs and the PinICL log is
 24 removed. Do you know why?
 25 **A.** I've no idea at all.
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1 **Q.** Again, there's no references to Tivoli events in 2007.
 2 **A.** No, I've got no idea.
 3 **Q.** Okay.
 4 **SIR WYN WILLIAMS:** All right. Thank you, Ms Patrick.
 5 **MS PATRICK:** Thank you, sir.
 6 **SIR WYN WILLIAMS:** Does anyone else think they're going to
 7 ask any questions?
 8 **MR STEIN:** Sir, I was going to ask questions. I was going
 9 to take five minutes. Can I undertake to do it in
 10 three?
 11 **SIR WYN WILLIAMS:** Does it actually relate to a client,
 12 Mr Stein, or is it of a more general nature?
 13 **MR STEIN:** I have to say, it relates to clients generally,
 14 rather than an individual client.
 15 **SIR WYN WILLIAMS:** Well, I think I've heard enough from this
 16 witness to form a proper impression of the crucial
 17 points, all right?
 18 **MR STEIN:** Very well, sir.
 19 **SIR WYN WILLIAMS:** We'll now adjourn until tomorrow morning.
 20 Thank you, Mr Ward, for answering all those
 21 questions and coming to the Inquiry.
 22 So, Mr Beer, we have closing submissions tomorrow;
 23 yes?
 24 **MR BEER:** Yes, commencing at 10.00 am tomorrow.
 25 **SIR WYN WILLIAMS:** All right. See you all then.

1 **MR BEER:** Thank you very much.
 2 (4.48 pm)
 3 (The hearing adjourned until 10.00 am the following day)

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I N D E X

GRAHAM WARD (sworn)	1
Questioned by MR BEER	1
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