

Friday, 2 February 2024

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2 (10.00 am)
3 **MR BEER:** Good morning, sir, can you see and hear us?
4 **SIR WYN WILLIAMS:** Yes, I can, thank you very much.
5 **Further evidence read into the record by MR BEER**
6 **MR BEER:** Thank you, sir.
7 Before we proceed to hear submissions from Core
8 Participants, I would like, if I may, please, to address
9 you in relation to the status of written statements that
10 have been obtained for the purposes of Phase 4 of the
11 Inquiry, from individuals who have not appeared before
12 you to give oral evidence.
13 **SIR WYN WILLIAMS:** Yes.
14 **MR BEER:** To ensure that the Inquiry has obtained as full
15 a picture of Phase 4 issues as possible, Rule 9 requests
16 were sent to a wide pool of individuals, a wider pool
17 than those who have ultimately been called to give oral
18 evidence before you. This was the case for each
19 category of Phase 4 witness we've heard from, namely
20 Post Office Policy and Practice witnesses, Criminal
21 Prosecution Case Study witnesses and Civil Recovery Case
22 Study witnesses.
23 Where the Inquiry has decided that it's not
24 necessary to hear oral evidence from individuals who
25 have provided written statements, their statements will

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1 Can we go to slide 3, please. The witnesses listed
2 on this page were each sent Rule 9 requests because they
3 were Auditors involved in one or more of the criminal
4 investigation and prosecution case studies that you
5 selected for Phase 4. Their written evidence is
6 informative as to the practices of Auditors, insofar as
7 it's relevant to Phase 4 issues, but their oral evidence
8 would not have added materially to the evidential
9 picture.

10 Can we go to the next slide, please.

11 The witnesses listed here held other roles in
12 relation to Phase 4 criminal investigation and
13 prosecution case studies, namely financial investigation
14 and Contracts Adviser roles. Again, it was considered
15 that these witnesses attending to give evidence would
16 not add materially to the evidential picture.

17 Slide 5, please.

18 All of these witnesses have provided witness
19 statements relating to the Cleveleys Post Office civil
20 recovery case study. The first listed witness is Julie
21 Kay, previously Wolstenholme, the subpostmistress at the
22 branch. The second individual only had fleeting
23 involvement in the case and was unable to take your
24 enquiries further in his statement. The third
25 individual provided a corporate disclosure statement on

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1 be admitted into evidence and treated as having been
2 read into the record and the witness statements will
3 shortly be disclosed on the Inquiry's website.

4 I should say that the fact that the statements are
5 to be read into the record does not mean that the
6 accounts given within them is agreed by each of the Core
7 Participants. It's necessarily untested evidence.

8 Could we have on the screen, please, INQ00002020.
9 This is a PowerPoint presentation with a series of
10 slides which the Inquiry Team has prepared listing the
11 written statements that are to be read into the record
12 set out by category of witness. Can we go to slide 2,
13 please.

14 On this slide, we have a list of witness statements
15 relating to "Post Office Policy and Practice". You can
16 see the names of each of the witnesses there and the
17 unique reference numbers of their witness statements.
18 As I've said, they will be uploaded to the Inquiry's
19 website.

20 The individuals listed here were all sent Rule 9
21 requests based on the description of their roles held at
22 the Post Office at the relevant time. They've not been
23 called to give oral evidence because there were other
24 witnesses who were better placed to speak to the given
25 areas of policy and practice.

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1 behalf of Royal Mail in relation to the disclosure of
2 documents relevant to the Cleveleys case.

3 Slide 6, please.

4 The individuals listed here provided witness
5 statements in relation to their knowledge of relevant
6 events at the Marine Drive Post Office, a further civil
7 recovery case study: a lawyer from Bond Pearce, two
8 temporary subpostmasters, a member of staff at the
9 branch and an employee of Fujitsu.

10 Can we go to the last slide, please, slide 7.

11 Finally, sir, there are some written statements
12 relating to Phase 2 and 3 of the Inquiry which have been
13 received by the Inquiry since I addressed you at the end
14 of Phase 3 in relation to written records to be read
15 into the record, in the same way as I'm reading them in
16 now.

17 Thank you, that PowerPoint presentation can come
18 down.

19 Those are the statements the Inquiry Team wish to be
20 read into the record at this stage. I should pause to
21 say that the Inquiry has received a significant volume
22 of disclosure in the course of Phase 4 and the Phase 4
23 hearings and it expects to receive more disclosure that
24 is relevant or may be relevant to Phase 4 in the near
25 future. We will keep, of course, those documents under

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1 review and will disclose them to Core Participants as
2 soon as reasonably practicable after their receipt.

3 I should say, as we've said before, the Inquiry Team
4 will not seek to hesitate to re-call any witnesses,
5 where it considers it's necessary to do so, to put
6 questions to them on new documents that have come to
7 light. The appropriate time to do that will be
8 determined in due course but will likely be during the
9 Phase 5 and 6 hearings, should that be necessary.

10 That's all I wish to say at the moment, sir, in
11 terms of reading documents into the record and we move
12 now to the closing submissions from the Core
13 Participants in an order which you have directed,
14 starting, I think, with Mr Moloney.

15 **SIR WYN WILLIAMS:** Yes, Mr Beer.

16 Before Mr Moloney addresses me, can I reiterate that
17 those who have been following the Inquiry will realise
18 that not all witness statements result in witnesses
19 giving live oral evidence. Inevitably, there is
20 an exercise of judgement as to who should be called to
21 give oral evidence and I am completely satisfied that
22 very careful consideration has been given as to which
23 witnesses should be called and which witnesses should
24 simply stand as witnesses with their witness statement
25 read into the record.

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1 asking for help. Time and again, faced with
2 investigation and the threat of prosecution, they told
3 the Post Office that there were unexplained
4 discrepancies, unexplained problems with the system,
5 that they did not take any money and that they were not
6 dishonest. Time and again, they were prosecuted and
7 convicted. Time and again, their lives were ruined.

8 It's only as a result of the dedication of many
9 hundreds of brave men and women postmasters and their
10 supporters working together that some justice has
11 finally been found in the greatest miscarriage of
12 justice in the modern UK legal history.

13 Now people are listening. Our clients are now
14 finally being heard. They are not guilty and they
15 always were not guilty. This phase has been critically
16 important at getting at the real truth for them about
17 what they went through.

18 As our client, Tim Brentnall, told the Inquiry as
19 long ago as 1 March 2022 in Phase 1:

20 "Horizon merely provided the data that showed
21 a shortfall but it was people who chose to believe that
22 data over myself or hundreds of other subpostmasters.
23 It wasn't Horizon that prosecuted us. It was the Post
24 Office. It wasn't Horizon that encouraged us to pay
25 back money under threat of theft charges. That was

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1 So I am ready for Mr Moloney now.

2 **MR BEER:** Thank you sir.

3 Closing statement by MR MOLONEY

4 **MR MOLONEY:** Thank you, sir.

5 We represent 76 former postmasters, all of whom were
6 prosecuted and convicted and all of whom have since had
7 their convictions quashed but only after having their
8 lives destroyed by the scandal at the heart of this
9 Inquiry. Those former postmasters include Jo Hamilton,
10 Noel Thomas, Michael and Susan Rudkin, whose stories,
11 together with many others featured in the ITV drama,
12 *Mr Bates vs The Post Office*, which has inspired the
13 powerful groundswell of public and political interest in
14 this scandal.

15 That drama sees Jo Hamilton surrounded by paperwork,
16 distraught and seeking assistance from the helpline.
17 She didn't know what was going on nor what to do. The
18 help offered was no help at all, doubling a discrepancy
19 before her eyes. Those scenes, which have had such
20 impact, were real life for Jo, as detailed in her first
21 witness statement to this Inquiry back in 2021.

22 Our clients' stories repeatedly echo that awful fear
23 and the impossible questioning of themselves and
24 Horizon. Time and again, they asked for help. For
25 many, because none came, the time came when they stopped

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1 people at the Post Office."

2 In this phase, the Inquiry has begun, as
3 Mr Brentnall urged, to consider responsibility for the
4 investigation and prosecution of postmasters. The
5 evidence of the postmasters heard in Phase 1 is now
6 confirmed by hours and hours of witness evidence and
7 tens of thousands of pages of evidence which illustrate
8 the corporate and individual failures which came to see
9 so many people of previous good character criminalised,
10 the evidences of individual actions, which were, in some
11 cases, at best, shameful. At worst, those actions now,
12 as perhaps just a starting point, lay some witnesses
13 open to rigorous criminal investigation.

14 We represent 16 of the 22 case study Core
15 Participants in England and Wales and Mr Alan McLaughlin
16 in Northern Ireland. For them, this phase has been both
17 challenging and informative. We obviously don't propose
18 to go through much of the evidence that's been heard,
19 such has been the scale of this phase, there just isn't
20 time. But, instead, in our address today, we focus on
21 three primary submissions based on the evidence heard in
22 Phase 4.

23 First, the approach of Post Office, supported by
24 Fujitsu to investigation and recovery of losses, as well
25 as prosecution of alleged offences, was deeply and

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1 fundamentally flawed.

2 Second, the management and oversight of
3 investigations and prosecutions by the Post Office, as
4 supported by Fujitsu, was wilfully blind to, or
5 disregarding of, the proper lawful administration of
6 justice.

7 Thirdly and finally, an overarching focus on the
8 commercial interests of both the Post Office and
9 Fujitsu, including in protecting the brand reputation of
10 both companies, contributed significantly and
11 detrimentally to the prosecution of individuals in the
12 face of faults in Horizon, of which the Post Office were
13 or ought to have been aware.

14 We now develop each of those in turn, sir. First,
15 the approach of the Post Office supported by Fujitsu to
16 investigation and recovery of losses, as well as
17 prosecution of alleged offences, was deeply and
18 fundamentally flawed. This is by far the longest
19 section of our submissions; the other submissions are
20 much shorter.

21 Until this scandal is uncovered, the Post Office
22 remain proud of its centuries old heritage in law
23 enforcement. A History of Royal Mail Investigations,
24 Prosecutions and Security was produced in 2010 and the
25 reference is LCAS0000124.

1 the Post Office, of necessity, were known or ought to
2 have been known to both the Post Office and to Fujitsu
3 throughout the life of both Legacy Horizon and Horizon
4 online but they were ignored in apparent acts of
5 institutional amnesia.

6 We include the following very few examples which
7 evidence that proposition. First, on behalf of Fujitsu,
8 Paul Patterson accepted on 19 January, at page 16 of the
9 transcript:

10 "All the bugs and errors had been known at one level
11 or not for many, many years. Right from the very start
12 of deployment of this system, there were bugs, errors
13 and defects which were well known to all parties,
14 actually."

15 It was his evidence that the vast majority of bugs,
16 errors and defects was shared contemporaneously with the
17 Post Office. He accepted that this information ought to
18 have been included in evidence provided by Fujitsu in
19 support of Post Office litigation.

20 Everything that was known about the troubled birth
21 of Horizon, the Acceptance Incidents and including, of
22 course, the third supplementary agreement, would warrant
23 real care in investigating any challenge to the
24 integrity of Horizon. Indeed, that process fixes senior
25 management in both organisations with the knowledge of

1 We can now see that that pride was severely
2 misplaced long before 2010. It's said that it's only
3 when the tide goes out that you can see who has been
4 swimming without a costume and, now that the tide has
5 gone out on Post Office and they've been forced to open
6 up their books, we've been able to see just how wrong
7 things were in Post Office law enforcement, that there
8 was nothing to be proud of once Horizon came to blight
9 the lives of a great many people.

10 But before setting out just how the Post Office,
11 supported by Fujitsu, failed in its duties as
12 a prosecutor, it's important to briefly look back to the
13 evidence which emerged in Phases 2 and 3 of this
14 Inquiry, in order to identify a number of factors which
15 are critical to informing the analysis of where Post
16 Office went wrong and why in investigation and
17 prosecution, factors that created the conditions in
18 which this miscarriage of justice occurred.

19 These factors contain, first, bugs, errors and
20 defects from the outset and the institutional amnesia
21 around them, the inadequacy of audit data and audits and
22 the policies develop around investigation and
23 prosecution. The existence of bugs, errors and defects
24 in Horizon, impacting on the integrity of accounts, and
25 thus the integrity of investigations and prosecutions by

1 problems in Horizon and fallibility as concerns the
2 integrity of accounts which would affect prosecutions
3 from the start, yet there is no evidence of any such
4 caution in the approach of either Post Office or
5 Fujitsu.

6 On the contrary, as highlighted in our opening for
7 this Inquiry and in our closing submissions for Phase 2,
8 the priorities for both businesses appear to have moved
9 swiftly in 1999/2000 from concern over integrity to the
10 further commercial exploitation of Horizon.

11 Further, when, in 2001, the audit data loss
12 occurred, it ought to have been clear that the audit
13 trail was in secure. In 2003, Post Office was put on
14 notice of admissions in evidence relied upon in evidence
15 as a result of operator error and, again, in January
16 2009, when Post Office was belatedly notified that bugs,
17 errors and defects had impacted the critical audit trail
18 for Horizon, this ought to have been an even greater
19 reason for caution on the parts of Post Office.

20 Yet, in summer 2010, facing further revelations of
21 bugs connected to duplicates in audit data, which
22 impacted upon or potentially impacted upon evidence
23 provided to the court, the Post Office was again willing
24 to rely on Fujitsu assurances without independent
25 testing.

1 Mr Patterson accepted that the information disclosed
 2 to relevant subpostmasters about the 2010 bug was not
 3 the "whole truth about audit data problems", yet
 4 business as usual was resumed. Prosecutions continued
 5 undeterred.

6 Indeed, this work ran in parallel with public
 7 relations efforts by the Post Office in response to
 8 growing concerns for injustice expressed in 2009
 9 reporting from Computer Weekly, the BBC and The Grocer.
 10 By February 2010, the Post Office had adopted a stock
 11 line that the system was robust in response to such
 12 reporting.

13 This was seen in an email from Hayley Fowell to
 14 David X Smith, Michele Graves -- who managed executive
 15 correspondence -- and others on 2 February 2010. It's
 16 POL00002268 and it's at page 2, when she says:

17 "I am providing our stock line which states the
 18 system is robust."

19 It will be for the Inquiry to address precisely who
 20 knew what and when at what level, and whether and to
 21 what extent Fujitsu held information back about the
 22 precise extent and nature of bugs, errors and defects to
 23 serve its own business interests.

24 We note, for example, the initial approach taken to
 25 the summer 2010 audit data, the duplicate transactions

1 Barnes and Mr Simpkins and with Mrs Chambers at some
 2 length. Yet this appears to have had little or no
 3 impact on the training offered to Investigators,
 4 Auditors or the Casework Management Team for Post
 5 Office.

6 Evidence was consistent that no training was
 7 provided on what sat in the audit trail or its purpose.
 8 Indeed, a standard ARQ would never be enough to
 9 understand or interrogate the integrity of Horizon data
 10 and that was expressly accepted by Paul Patterson on
 11 19 January at page 57 of the transcript. That was known
 12 or ought to have been known to both Fujitsu and Post
 13 Office by 2002. As just said, the 2002 prosecution
 14 support policy demonstrated that to be the case.
 15 Mr Patterson confirmed that the data held by Fujitsu
 16 would include event logs but that the routine checking
 17 of event logs by the Litigation Support Unit did not
 18 begin until after 2008, and that's page 55 of the
 19 transcript.

20 So Fujitsu would have been aware that the Post
 21 Office was litigating on the basis of incomplete
 22 information from pretty much the start of the process
 23 and, in any event, from 2007, when Mrs Chambers said
 24 expressly in her Afterthoughts document she sent to
 25 management that Tivoli events were not being disclosed,

1 bug. That initial approach appeared first to consider
 2 the impact of acceptance of Horizon Online. It was said
 3 in FUJ00097046, "Please do not make any communication on
 4 this with Post Office for the moment". When information
 5 was provided to the Post Office, the Inquiry may
 6 consider whether it was delayed, underplayed or
 7 misrepresented on more than one occasion.

8 Secondly, Post Office and Fujitsu both knew from the
 9 outset that the data held in the audit trail, and not
 10 only that held on the counter or provided as part of
 11 a standard ARQ request, would be crucial to any
 12 investigation based on the integrity of accounting data.
 13 But that was not acted on and prosecutions continued
 14 without ensuring that the right data was accessible by
 15 Investigators.

16 The 2002 Network Banking Prosecution Support Policy,
 17 which Ms Patrick asked Mr Ward about yesterday afternoon
 18 and its later 2007 iteration, makes clear that the data
 19 held by Fujitsu, as part of the audit trail and for the
 20 purposes of prosecution support, goes well beyond that
 21 covered in an ARQ statement.

22 It makes clear that the work to be done by Fujitsu
 23 was to go beyond production of the material in an ARQ
 24 statement and a simple statement of fact. It refers to
 25 events data, which the Inquiry has covered with Gerald

1 and that's FUJ00152299. She wrote:

2 "This suggested that the disclosure of the message
 3 store itself was an afterthought, though it is
 4 fundamental to the system."

5 And:

6 "Surely the full message store has to be disclosed
 7 in all cases", and yet that was not acted on.

8 Critically and in any event, it's admitted that the
 9 audit trail held by Fujitsu lacked the integrity
 10 required by the contractual arrangements agreed with the
 11 Post Office. That's at page 39 of the transcript of
 12 Mr Patterson's evidence.

13 So the data that was available and used for
 14 prosecutions was never really adequate nor sufficient.
 15 Moreover, the Post Office, NBSC, and Fujitsu's HSH and
 16 higher levels of support appeared to operate on
 17 an unjustifiable default presumption that, without
 18 further evidence, the cause of any discrepancy would be
 19 user error.

20 This created an implicit bias against the effective
 21 investigation of system problems and substantially
 22 disadvantaged postmasters.

23 Having heard evidence in Phase 4, the Inquiry may
 24 reach the conclusion that this default presumption found
 25 its way through to the attitude of Investigators in

1 interview, something which we consider shortly.
 2 Importantly, in that context of a default
 3 presumption that the user was to blame, any Post Office
 4 audit that did happen was a simple stock check against
 5 the figures produced by Horizon. Auditors were there
 6 not to help an SPM in trouble, a subpostmaster in
 7 trouble, they were there to do a stock check.

8 Auditors held no particular IT skills nor were they
 9 professionally qualified auditors or accountants.
 10 Mr Ferlinc confirmed that on the 4 July.

11 The identification of any apparent shortfall
 12 resulted in near automatic consequences for
 13 a postmaster: suspension, a contractual inquiry and
 14 a possible criminal investigation followed.

15 As Helen Rose confirmed, it was only in the case of
 16 a discrepancy due to a known error that a postmaster
 17 would be authorised to place the sum in a suspense
 18 account. In all other circumstances it appears that
 19 a formal disciplinary and/or criminal investigation
 20 would follow. Auditors could print reports from the
 21 counter for use in any later investigation but they had
 22 no access to the underlying Fujitsu audit trail.

23 To confound that obvious problem, any system audit
 24 data was considered a matter for others to investigate
 25 at a later stage, only after the instigation of

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1 create the conditions for this miscarriage of justice is
 2 that contractual arrangements and policies were
 3 consistently read, rightly or wrongly, to promote the
 4 business interests of Post Office and/or Fujitsu and to
 5 the detriment of postmasters.

6 Echoing arguments before Mr Justice Fraser, the
 7 Inquiry heard evidence on corporate misreading of the
 8 contractual obligations owed by postmasters for losses,
 9 equating them to strict liability for anything that and
 10 everything that went wrong. Witnesses repeatedly
 11 adopted the essential position that postmasters were
 12 "responsible for all losses", and seemingly required to
 13 make good any discrepancy, whether attributable to
 14 negligence, error, or fraud.

15 This dangerous misreading of the legal terms on
 16 which the Post Office Network operated, alongside the
 17 default perception amongst Post Office staff that any
 18 discrepancy was a user problem, as we've already
 19 referred to, sir, perhaps reinforced the erroneous
 20 impression that any flaw in the system must be human.

21 The Post Office, without foundation, routinely
 22 reversed the burden of proof in requiring postmasters to
 23 disprove their responsibility for discrepancies. As
 24 Mr Ferlinc said on 4 July:

25 "So the auditor must find the discrepancy if there

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1 an investigation by management or the Security Team.

2 Moving on from audit, another factor which created
 3 the conditions for this miscarriage of justice was that
 4 the Horizon contract and policy requirements agreed by
 5 the Post Office and Fujitsu treated the prosecutorial
 6 function of the Post Office as an afterthought.
 7 Policies and practices across both companies for the
 8 role which they each were to play in the criminalisation
 9 of hundreds of men and women of previously good
 10 character were neglected, ill conceived or disrespectful
 11 of the law.

12 There was evidence of cutting and pasting, including
 13 possibly from pre-Horizon material, without thought
 14 being given to any known bugs, errors and defects.
 15 Prosecution support had to begin work under
 16 a without-prejudice agreement, pending further
 17 negotiation. The first written prosecution support
 18 policy appears only in November 2002.

19 We do not dwell on the appalling racist language in
 20 the now notorious Identification Codes document. This
 21 was most recently circulated in 2013 when many agreed it
 22 would have been read. There was no evidence of any
 23 challenge to its substance at any point in its use by
 24 Post Office.

25 Last but not least, among the conditions which

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1 was one and then there could be number of reasons why
 2 there was a discrepancy. The subpostmaster would be
 3 expected to make good, unless they could identify the
 4 reason why."

5 The onus in this policy was upon subpostmasters to
 6 prove something that they could not prove or probably
 7 could not prove, it was conceded.

8 Witnesses repeatedly accepted that proof of a fault
 9 in Horizon would be an unfair and even impossible task
 10 to set for postmasters with limited access to the data
 11 behind the counter held by Post Office and Fujitsu.

12 This approach was inconsistent with any ordinary
 13 contractual construction and an obscene reversal of the
 14 presumption of innocence.

15 Then, looking at Post Office policies on
 16 investigation and prosecution, they repeatedly stressed
 17 the significance of the interests of the business and
 18 the recovery of losses, to which we return later.

19 Just one example, which was from the Security
 20 Operations Team's Compliance Guide to the Preparation
 21 and Layout of Investigation Red Label Case Files,
 22 POL00038452, and page 13 of that document. It read:

23 "Significant failures that may affect the successful
 24 likelihood of any criminal action and/or cause
 25 significant damage to the business must be confined

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1 solely to the confidential offender report. Care must
2 be exercised when including failures within the
3 disciplinary reports as obviously this is disclosed to
4 the suspect and may have ramifications on both the
5 criminal elements of the Inquiry as well as being
6 potentially damaging to the reputation or security of
7 the business."

8 Some witnesses appeared to accept that this was
9 antithetical to the disclosure duties in prosecution.
10 A document ought to be disclosed precisely because it is
11 considered to impact upon either the prosecution or
12 defence case.

13 Another example is found in the Memorandum of
14 Understanding on Joint Investigation reached between the
15 Royal Mail Group and Post Office post-separation, and
16 this was agreed in January 2012. At paragraph 2.4 of
17 POL00105098, it reads under "Prosecution Decision", 2.4:

18 "Cases leading to an interview under caution will
19 ordinarily be reported to the Criminal Law Team acting
20 on behalf of the organisation which has suffered the
21 loss and against which the offences have been committed,
22 for advice on the sufficiency of evidence and the usual
23 public and business interest considerations. There may
24 be exceptions to this where the lead business is the
25 more appropriate choice and this will normally be at the

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1 the light of the evidence on the case studies identified
2 by the Inquiry is simply unsustainable. At each stage,
3 there were clear flaws which, whether by design or
4 practice, substantially disadvantaged the postmaster.

5 The Inquiry also has the evidence of Mr Atkinson
6 that, in policy and in practice, the Post Office skipped
7 over core steps and ignored legal obligations
8 fundamental to the duties of a responsible prosecutor.

9 We do not revisit his detailed conclusions but
10 highlight particular faults in investigation and
11 prosecution on which the Inquiry may wish to draw and we
12 hope these may, in fact, echo the conclusions of
13 Mr Atkinson and the experience of many subpostmasters in
14 evidence.

15 Just going to those faults now, with investigations
16 and the Investigators.

17 Subpostmasters told Post Office Investigators,
18 Security Managers, that there were unexplained
19 discrepancies or they blamed the system outright. The
20 Post Office did not listen or refused to hear. We make
21 a number of points about their approach.

22 The Inquiry might conclude that Post Office
23 Investigators, Security Managers, were underqualified,
24 ill trained and undersupervised. The Inquiry heard of
25 the short weeks of training completed in-house, followed

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1 discretion of the appropriate Legal Team and the Royal
2 Mail Head of Investigations and Post Office Limited
3 Senior Security Manager Security Operations."

4 The issue of business interest in prosecution
5 decision making was addressed squarely by Duncan
6 Atkinson king's Counsel in his evidence. He said,
7 perhaps with a degree of understatement:

8 "There was also, in the material I saw, references
9 to a series of factors that it was considered were
10 relevant to a prosecution, which included the best
11 interests of the business and the integrity of the mail,
12 as opposed to the much more nuanced and detailed set of
13 criteria that would or should be applied to
14 a prosecution decision by reference, for example, to the
15 Code."

16 That was on 5 October 2003 at page 56.

17 The Inquiry may consider whether this focus on
18 business interests reflected or fostered a culture which
19 degraded the administration of justice, objectified and
20 diminished the subject of the investigation and
21 encouraged instead a focus, first, on the bottom line.
22 We return to this in our third and final main
23 submission.

24 Any proposition that problematic policies were
25 ironed out in training or practice notes and judged in

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1 by mentoring in-house, which it might conclude
2 perpetuated a particular brand of Post Office practice.

3 Interviews with suspects, which were fundamental to
4 the Post Office prosecutorial approach, were handled
5 unprofessionally, both in their conduct and their
6 presentation, for the purposes of prosecutorial decision
7 making and for trial.

8 Following the theme of the default position in the
9 contract that the postmaster was responsible for all
10 losses, there was an apparent default assumption of
11 fault and dishonesty in the face of any Horizon
12 discrepancy.

13 The Inquiry saw it in the interviews of David
14 Blakey, inexplicably asked about whether he had been in
15 an adulterous relationship and faced with the suggestion
16 that his ill wife would be investigated; and
17 Alison Hall, whose position that Horizon was not
18 100 per cent was not reflected in her suspect offender
19 report, to name just two examples; and even saw the
20 Investigators asking Lynette Hutchings why it was that
21 she did not have a solicitor based locally to her but,
22 instead, had retained the services of Issy Hogg, who had
23 represented Jo Hamilton, Seema Misra and others.

24 Time and again, postmasters were aggressively
25 accused of lying, simply because they could not explain

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1 where the money had gone. The interviewer would
2 typically ask "Where has the money gone?" The
3 postmaster would reply, "I don't know", to which the
4 interviewer would respond, "You're lying".

5 Investigators faced with challenges to Horizon
6 repeatedly failed to explore reasonable lines of inquiry
7 and the failure to explore reasonable lines of inquiry
8 went beyond challenges to Horizon data.

9 Investigators were not trained in the operation of
10 Horizon nor in the role of the audit trail. They were
11 not technically qualified. When Horizon issues were
12 explored, the Post Office was completely reliant on
13 Fujitsu for the answer. Fujitsu was relied on to
14 explain away any questions; it marked its own homework.

15 The handling of expert evidence by Post Office
16 Investigators, supported by Fujitsu, was fundamentally
17 and irretrievably flawed, and inconsistent with the
18 requirements of fairness and proper criminal procedure:
19 no expert declaration, for example. Moreover, there's
20 no question that the Security Team were aware of
21 repeated challenges to Horizon integrity. Any
22 suggestion that cases were never discussed or that the
23 team was unaware of the challenges in the press ought to
24 be treated with contempt, we say. There will be no need
25 to remind the Inquiry that we had the truly

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1 Jacqueline McDonald's prosecution was a case in point.
2 In what he said was flamboyant language, he claimed to
3 have persuaded counsel for the Post Office to have
4 insisted on a trial of theft allegations, rather than be
5 content with Mrs McDonald's pleas to false accounting,
6 and he did so in order to counter the postmasters'
7 campaign.

8 If her pleas to false accounting had been accepted,
9 even though she was guilty of nothing, she might have
10 avoided prison. As it was, a 47-year-old mother of two,
11 of previous good character, she was sent into custody
12 away from her children and family and had to endure all
13 the indignities, which we won't elaborate upon here,
14 that go with being confined to a closed prison.

15 Mr Bradshaw had no reason to be proud of himself.

16 Financial investigation and the recovery of losses
17 also played a significant, if not guiding role in the
18 conduct of criminal investigations and subsequent
19 prosecutions.

20 Yesterday, Mr Ward was taken to POL00121975, the
21 post-pub email, which speaks to the priority with which
22 Investigators were treating recovery. In the same
23 thread, he talks up the benefits of POCA over
24 a post-conviction compensation order because
25 compensation orders have no teeth. Ged Harbinson,

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1 extraordinary evidence of Mr Ward yesterday as to his
2 involvement in the proposed expert evidence of Gareth
3 Jenkins in the case of Noel Thomas.

4 Investigators' handling of ordinary witness evidence
5 was often fundamentally and irretrievably flawed as well
6 and inconsistent with the requirements of fairness and
7 proper criminal procedure. We have in mind, for
8 example, that Stephen Bradshaw allowed Cartwright King
9 to write and serve his statements for him, even though
10 he did not agree with the contents. The Inquiry will
11 remember the evidence of Cath Oglesby, who appeared
12 almost astonished that anybody would even think that she
13 would have been responsible for what was in her own
14 signed statement.

15 Investigators' handling of disclosure, including
16 requests from the defence, was also irretrievably flawed
17 and inconsistent with the requirements of fairness,
18 justice and proper criminal procedure. Investigators
19 actively helped shape the prosecution approach to
20 particular cases in order to protect the interests of
21 the business to the detriment of the defendant.

22 The Inquiry heard numerous examples of Investigators
23 attending conferences with counsel and involved in
24 discussions on plea, including at the door of the court.
25 Stephen Bradshaw's self-appraisal in respect of

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1 another Financial Investigator, asked by Juliet
2 McFarlane for a view on a possible plea for Jo Hamilton
3 said:

4 "I'm never confident with false accounting charges
5 in relation to recovery under POCA 2002 and the theft
6 charge makes life so much easier."

7 I will return to this later.

8 Finally, the Post Office Security Team and
9 individual Investigators operated free from professional
10 obligation and regulatory oversight. There was and is
11 no Independent Office for Police Complaints for the Post
12 Office police, the Investigators. These policemen were
13 accountable only to the company to which they were so
14 loyal.

15 There were thus numerous highly significant problems
16 in the process of investigation and the actions of
17 Investigators, which this Inquiry has heard evidence of,
18 and we are only able to briefly touch upon them today.
19 But there were similar problems with prosecution and
20 prosecutors, and we turn to those now, sir, as the final
21 part of this aspect of our first submission.

22 Subpostmasters defended their innocence, denied
23 dishonesty and produced defence statements and
24 disclosure requests which put unexplained discrepancies
25 front and centre as issues in the case. They produced

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1 independent expert reports.

2 Alan McLaughlin did all of that in the clearest ways
3 possible but still the Post Office did not hear or
4 refuse to hear.

5 So far as the difficulties, the problems, the clear
6 faults in prosecutions and prosecutors, we include the
7 following for the reference of the Inquiry. First, the
8 Inquiry might conclude that some members of the Legal
9 Team at Post Office were underqualified, undertrained
10 and ill supervised. Jarnail Singh ascended to Head of
11 Criminal Law, seemingly because he was the only one
12 left, whilst simultaneously practising in a completely
13 different area of law in his spare time.

14 Prosecutors, including internal and external lawyers
15 acting for Post Office said they were given limited or
16 no training on the audit trail operated by Fujitsu on
17 behalf of the Post Office.

18 The internal and external lawyers, acting as
19 prosecutors at times, appeared to put the interests of
20 the business before their professional obligations and
21 failed to take obvious steps to meet the requirements of
22 fairness, justice and proper criminal procedure.

23 There was evidence that they failed to conduct
24 adequate scrutiny and supervision of investigations,
25 including their failure to identify reasonable lines of

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1 "It is to be hoped that the case will set a marker
2 to dissuade other from jumping on the Horizon bashing
3 bandwagon."

4 Decisions on charging were unsupported by evidence
5 and appeared to have departed from the guidance of the
6 Court of Appeal in *Eden* and the Inquiry is now well
7 familiar in the review of Graham Brander in his suspect
8 offender report prepared for Jo Hamilton, saying that:

9 "Having analysed the Horizon printouts and
10 accounting documentation, I was unable to find any
11 evidence of theft or that the cash figures had been
12 deliberately inflated."

13 Decisions on plea were inappropriately circumscribed
14 by conditions related to the defence of Horizon and the
15 recovery of funds. The acceptance of pleas, as you well
16 know, sir, was sometimes conditional on an agreement not
17 to criticise Horizon -- for example, the cases of
18 Allison Henderson and Alison Hall -- and Mrs Hamilton
19 was required to pay the illusory debt she owed before
20 sentence or she would have been proceeded against on the
21 theft allegation.

22 These were all actions, whether in the civil or
23 criminal teams, under the supervision of General
24 Counsel, we understand a board level appointment
25 reporting to the Company Secretary. Many questions

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1 inquiry and their mismanagement of disclosure.

2 They also failed in their instruction of expert
3 evidence and served and relied upon expert evidence
4 which was obviously not compliant with the standards
5 required in both civil and criminal litigation.

6 These were trained lawyers.

7 See, for example the evidence yesterday on the
8 changes made Mr Jenkins' statement in Noel Thomas' case
9 and the failings apparent in the evidence of Jarnail
10 Singh and Warwick Tatford. They failed in respect of
11 disclosure duties, including in the handling of
12 third-party disclosure from Fujitsu and in the direct
13 response to defence requests and, importantly, they have
14 failed to exercise the independence expected of a legal
15 professional in the exercise of the discharge of their
16 duties to the court.

17 For example, in January 2010 Mr Singh called
18 disclosure requests by Mrs Misra's Legal Team
19 "unreasonably and unnecessarily raised", and sought
20 counsel's advice thinking, "This may have a wider
21 implication for the business".

22 Mr Singh wrote or dictated the well-known
23 "bandwagon" email, which we won't repeat here, sir --
24 but is at POL00093686 and at page 5 -- but was
25 essentially concluded with:

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1 arise in relation to the advice being provided to the
2 Post Office by its Legal Team, which we anticipate will
3 be explored in Phases 5 and 6, touched on in this phase.

4 We anticipate that the Inquiry will continue to
5 consider the legal strategy in response to the first
6 civil claims pursued in 2011, including in the guidance
7 offered as to document destruction and the operation of
8 privilege, which was heard in this phase in the evidence
9 of John Breeden and others.

10 We note the evidence of Mr Scott and Mr Singh on the
11 shredding advice and the involvement of Ms Crichton in
12 the aftermath of the Simon Clarke Advices.

13 We note the circumstances in which Ms Crichton
14 departed from the Post Office remain as yet unclear and
15 we anticipate she'll be called in Phase 5 and so reserve
16 comment on these matters until then.

17 Having dealt with the Post Office roles in the
18 investigations and prosecutions, we ought to briefly
19 touch on the role of Fujitsu in supporting Post Office.
20 Mr Patterson accepted that information about bugs,
21 errors and defects ought to have been included in
22 Fujitsu evidence and expressed surprise that it was not.
23 He noted the editing of statements. He called this
24 state of affairs "shameful" and indeed it was. These
25 omissions and edits were part of a process that led to

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1 wrecked lives.
 2 Our observations on Fujitsu are necessarily
 3 provisional, pending the evidence of Mr Jenkins and the
 4 anticipated further evidence of Mr Dunks, but we
 5 suggest, firstly, that Fujitsu benefited from
 6 contractual terms which impacted upon the cost of audit
 7 data obtained by the Post Office in litigation support.
 8 They made Post Office pay to prove the integrity of
 9 their own system.

10 The Inquiry has heard much evidence on the caps on
 11 standard ARQ requests. Enhanced data was chargeable
 12 outside the ordinary ARQ allocation. Expert evidence
 13 was chargeable. These were costs which were not
 14 incurred lightly by the Post Office and which were
 15 apparently resented by some. On 19 March 2012, John
 16 Scott asked, "Why should we pay for Fujitsu to defend
 17 their own IT system?"

18 The answer is found, perhaps in the contemporary
 19 documents disclosed because it appears the Post Office
 20 agreed it would do so in the November 2002 Network
 21 Banking Prosecution Support Policy canvassed with
 22 Mr Ward yesterday.

23 Fujitsu provided provide any or adequate training to
 24 any of the team involved in prosecution support as to
 25 the role which they were playing, including on the

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1 inadequate representations of the state of its corporate
 2 knowledge.

3 Consecutive members of the Prosecution Support Unit
 4 appeared to have signed statements of truth concerning
 5 evidence which was outwith their knowledge, which was
 6 partial and misleading and which neglected to address
 7 the bugs, errors and defects known to Fujitsu.

8 Where amendments were made, the Inquiry might
 9 consider where it was that witnesses conceded to such
 10 an amendment. The Inquiry heard numerous examples of
 11 statements given, and we don't address each of them or
 12 any of them in detail.

13 As a consequence, members of the Prosecution Support
 14 Unit may have tendered statements to court and appeared
 15 at trial on evidence which was outwith their knowledge
 16 and which was partial and misleading and/or which was
 17 incomplete. As mentioned earlier, feedback from Anne
 18 Chambers on the need for change in the approach taken by
 19 Post Office and Fujitsu to litigation support was
 20 seemingly shelved by management.

21 It appears that the Legal Team and corporate legal
 22 counsel for Fujitsu were or ought to have been aware of
 23 the significance of the role of the Prosecution Support
 24 Unit on ARQ data integrity problems, for example
 25 an email notifying periodic of a possible integrity

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1 provision of expert evidence in civil and criminal
 2 cases. Mrs Chambers and other witnesses spoke
 3 powerfully about the impact of giving evidence. The
 4 Inquiry has heard Fujitsu were aware or ought to have
 5 been aware of reluctance by members of their Litigation
 6 Support Unit to provide the evidence they were routinely
 7 being asked to sign off, such as Rajbinder Sangha, Donna
 8 Munro and Peter Sewell.

9 The inadequate steps taken by Legal Team for the
 10 Post Office in respect of witness statements and the
 11 instruction of expert evidence was addressed at length
 12 in evidence, but the same allegation of inaction could
 13 also be levelled at Fujitsu.

14 Diane Matthews provided a wholly inappropriate
 15 assurance to Mr Jenkins that giving evidence would be
 16 just like it was on TV.

17 A template or boilerplate statement agreed by
 18 Fujitsu and Post Office provided assurances which were
 19 inconsistent with practices at Fujitsu. Those related
 20 to statements on matters designed directly to provide
 21 assurances on the integrity of Horizon data. It missed
 22 points and was misleading, said Mr Patterson for
 23 Fujitsu, on 19 January at page 59.

24 Fujitsu must have or should have known, at the time
 25 that these statements were made, that they were

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1 problem in an ARQ, on the preparation of statements for
 2 court, and the proposed amendment of template statements
 3 prepared by the Post Office. They were involved in
 4 questions of integrity arising in the development of
 5 Horizon Online, where the Post Office sought an express
 6 undertaking to support Post Office in litigation to
 7 prove the integrity of Horizon, which was raised with
 8 Mr D'Alvarez in Phase 3.

9 So problems occurred, sir, of a really serious
 10 nature in investigations and prosecutions by Post Office
 11 and the support of Fujitsu.

12 Our second main submission -- and, as I said
 13 earlier, this and our final submission are much
 14 shorter -- is that the management and oversight of
 15 investigations and prosecutions by the Post Office, as
 16 supported by Fujitsu, was wilfully blind to, or
 17 disregarding of, the proper lawful administration of
 18 justice.

19 The challenges to the integrity of Horizon bought by
 20 subpostmasters were brought to the attention of
 21 management in the Post Office in individual
 22 prosecutions, in civil claims and, eventually, in the
 23 press. Still the Post Office did not hear those
 24 warnings, and/or refused to hear them. We advance eight
 25 propositions about Phase 4 evidence on the involvement

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1 of management in investigation and prosecution.
 2 First, as the evidence of Mandy Talbot confirms, the
 3 existence of challenges to the integrity of Horizon were
 4 dawn to the attention of management, including Rod Ismay
 5 and David X Smith at the Post Office, as early as 2005,
 6 and there is POL00107426, the briefing on *Castleton* and
 7 other cases on 23 November 2005 to confirm that.
 8 Second, at the very time that Noel Thomas was being
 9 investigated, suggestions made by Mandy Talbot in 2005,
 10 in the course of the *Castleton* case included a clear
 11 recommendation of the involvement of independent
 12 expertise beyond Fujitsu and a more consistent joined-up
 13 approach by the Post Office. Her recommendations appear
 14 to have been discussed and then largely stalled.
 15 Third, proposals for an independent external review
 16 in March 2010 were shut down following contact between
 17 several Senior Managers, including the Head of Criminal
 18 Law, the Head of Security and the head of Product and
 19 Branch Accounting.
 20 Fourth, the reason for this shutdown was plainly
 21 directly linked to duties of disclosure which would
 22 arise and the impact on challenges to Horizon.
 23 Fifth, the subsequent Ismay report was
 24 a whitewash -- and there's no other term for it --
 25 reflecting the stock line that Horizon was robust,

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1 making designed to protect Horizon, to deflect
 2 challenges to Horizon and to manage publicity around
 3 Horizon.
 4 These included members of more senior management
 5 with reporting lines into the board or roles in
 6 reporting to board level, for example: Rod Ismay,
 7 through the Risk and Compliance Committee; John Scott;
 8 and Susan Crichton. Mr Ward was yesterday shown
 9 a document suggesting that access to ARQ data and
 10 contract caps were discussed at Executive Committee
 11 level in 2003, and that was POL00114566 at 37.
 12 The role and responsibility of General Counsel, both
 13 at Fujitsu and the Post Office, remains to be fully
 14 explored but it's anticipated that the Inquiry will
 15 return to these themes further in Phases 5 and 6.
 16 Our third and final submission is that there was
 17 an overarching focus on the commercial interests of both
 18 the Post Office and Fujitsu, including in protecting the
 19 brand reputation of both companies, which contributed
 20 significantly and detrimentally to the fair prosecution
 21 of individuals in the face of faults in Horizon, of
 22 which the Post Office were or ought to have been aware.
 23 The evidence in this phase has been informative as
 24 to why these failings might have been able to continue
 25 for so long. These are matters which the Inquiry will

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1 agreed before February 2010, for which now no one in
 2 Post Office Management appears willing to own
 3 responsibility.
 4 Sixth, despite repeated recommendations for
 5 a coordinated approach to Horizon challenges, it appears
 6 there was no substantial effort to collate a record of
 7 challenges until 2012, when Helen Rose was said to have
 8 prepared a spreadsheet of approximately 20 cases, after
 9 she produced a short report. Regrettably, this report
 10 of 30 August 2012 painted an incomplete and misleading
 11 picture.
 12 Seventh, this critical information relating to
 13 internal concerns around Horizon, which had gone on for
 14 so long, was not disclosed to defendants in criminal
 15 prosecutions, including where there were specific
 16 requests for disclosure of other challenges by
 17 defendants raising questions of Horizon integrity.
 18 Eighth, steps taken in Post Office Management after
 19 2005 served to substantially delay the process of
 20 independent scrutiny, which began only with Second Sight
 21 and continues to this day with this Inquiry.
 22 There are substantial questions to be asked over the
 23 role of management in both the Post Office and Fujitsu
 24 in shaping this scandal. Phases 3 and 4 together make
 25 clear that senior management were involved in decision

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1 continue to consider in Phases 5 and 6 and we will
 2 return to the significance of any learning for the
 3 Inquiry's recommendations at the close of the Inquiry,
 4 but we have three main points to consider under this
 5 submission, at this stage.
 6 First, culture and attitude.
 7 Emails and correspondence unearthed by this Inquiry
 8 provide illustrative flashes of an arrogantly dismissive
 9 attitude adopted both by the Post Office and by Fujitsu
 10 staff, when it came to Horizon challenges.
 11 The Inquiry may conclude that where professional
 12 curiosity perhaps ought to have sparked enquiry, instead
 13 assumptions were made based upon a prevailing
 14 institutional attitude, which started with postmasters
 15 wrongly deemed responsible for all loss and ended with
 16 the assumption that all postmasters were crooks, in
 17 absence of evidence to the contrary.
 18 This was not just a coalface problem, which could be
 19 explained away as workplace banter, never intended to
 20 see the light of day. It was a thoroughly defensive
 21 attitude, designed to protect the interests of the
 22 business and which impacted decision making.
 23 In POL00169170 on 22 October 2010, Rod Ismay
 24 forwarded on the Jarnail Singh bandwagon email to others
 25 in very senior board level positions at the Post Office,

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1 including Dave Smith, Susan Crichton, who was General
2 Counsel, Mike Young and others. He said:
3 "Dave and the Executive Team have been aware of the
4 significance of these challenges and have been
5 supportive of the excellent work going on in so many
6 teams to justify the confidence that we have in Horizon
7 and in our supportive processes."

8 That much demonstrates how widespread this attitude
9 was and how high up it went. Far from reprimanding
10 Mr Singh for his emotive, gloating response to the
11 conviction of a postmaster, the Executive Team were
12 associated with the thanks offered by management to him
13 for his efforts. This was, of course, over a year since
14 the Computer Weekly article in 2009, at least six months
15 since Post Office rolled out its stock line that Horizon
16 was robust, and very shortly after Mr Ismay had
17 completed his Horizon Integrity Report in August 2010.

18 Over at Fujitsu, years earlier, for Jan Holmes,
19 Jason Coyne, the independent expert instructed in the
20 Cleveleys case, was dismissed as a "git". Peter Sewell
21 later, of course, called Mr Castleton "a nasty chap".
22 Asked about his role in the 2007 bug reported to Post
23 Office in 2009, he said, "We all protect our own
24 companies", and that's at INQ00001116 at pages 111-112.

25 The Inquiry might ask what, if anything, was ever
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1 the business, despite growing attention on the repeated
2 challenge to the integrity of Horizon following reports
3 in the press and in the broadcast media in 2009.

4 Third and finally under this, protecting the brand.

5 Post Office policy and the actions of individuals
6 were openly driven by an interest in protecting the
7 reputation of the business and in protecting the brand.
8 There was evidence too of similar action by Fujitsu
9 employees.

10 At its nadir of this public relations driven
11 approach to justice, the Inquiry has uncovered the
12 company line written by the Communications Team,
13 distributed by Jarnail Singh, to be adopted by "agents
14 and counsel", in response to any defence based on
15 Horizon integrity and which was adopted wholesale in
16 witness statements for court.

17 The duty to investigate, to truly ask whether there
18 were any problems in the integrity of Horizon accounts,
19 was to be deflected by a generic statement first
20 appearing as the stock line that Horizon was robust,
21 then again in 2012 as Our Story, on Second Sight to be
22 released to legal agents and counsel, and the final
23 agreed draft being prepared by the Head of Public
24 Relations and Media in an exchange copied to the Company
25 Secretary and General Counsel.

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1 done by Post Office and/or Fujitsu senior management and
2 board to dispel or to discourage this kind of "us and
3 them", blinkered, "win at all costs" culture. Was it
4 rather, at the very least, tacitly encouraged?

5 Secondly, recoveries, performance and reward.

6 In Phases 3 and 4, the Inquiry heard evidence of the
7 keen focus placed on recovery of perceived losses, both
8 in policy and in practice to the Post Office business.
9 This is consistent with the entire Security team being,
10 for several years, where documents were available,
11 subject to performance targets requiring first 40 per
12 cent recovery to losses, with a later increase in the
13 target to 65 per cent.

14 Whilst some witnesses denied this figure was
15 connected to any performance-related bonus, others
16 accepted that performance was marked against targets,
17 and performance informed both team and individual
18 bonuses. Recovery was one aspect of that performance.

19 The Inquiry may consider that the enthusiasm with
20 which individual Investigators self-assessed their
21 over-target recoveries speaks for itself.

22 Look at the evidence of Steve Bradshaw and Robert
23 Daily, for example, if required to see where that
24 evidence was. His target was a measure of the
25 importance with which these recoveries were treated by

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1 The Inquiry heard, of course, about the PR input on
2 Our Story prepared on appointment of Second Sight, which
3 again said Horizon was robust and it was distributed to
4 agents and counsel and made its way into witness
5 evidence for court through the evidence of the witness
6 statement of Stephen Bradshaw.

7 For centuries, the Post Office was a cornerstone of
8 public service in this country. It's been said many
9 times but it really was one of the United Kingdom's most
10 trusted institutions, integrated close to the heart of
11 every community, in our cities, our towns and our
12 villages. It was trusted with our mail, trusted with
13 our savings, our pensions and, for many, our
14 livelihoods. But those images are now long gone.

15 The future of both Post Office and Fujitsu was
16 intrinsically linked to the success of Horizon; horizon
17 simply could not and would not be allowed to fail. We
18 saw that in Phase 2 and we see it in Phase 4.
19 Postmasters were easy targets to point to, to persecute,
20 to prosecute, and to pursue for apparent losses and, by
21 contrast, Horizon could not and would not fail.

22 This false narrative hid, for too many years,
23 a disastrous reality that allowed the Post Office to
24 prosecute a large number of its own people and to
25 bankrupt many more, and to pursue hundreds of thousands

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1 of pounds in false recoveries in reliance on false data.
 2 Yet, the false narrative, in some places, continues to
 3 run. In their evidence to this Inquiry, some Post
 4 Office witnesses have continued to assert their enduring
 5 belief that postmasters are guilty, second-guessing the
 6 Court of Appeal -- for example, Andrew Wise and Gary
 7 Thomas -- and to question if Horizon lacked integrity --
 8 Susan Harding.

9 "Where had the money gone?" asked postmasters, with
 10 ever-increasing desperation. This was an obvious
 11 question that it appears the Post Office could not or
 12 would not ask, let alone answer.

13 In none of the detailed case studies explored by the
 14 Inquiry was there any concrete evidence of serious
 15 investigative effort on the part of the Post Office to
 16 prove a loss beyond Horizon. There was no money found
 17 secreted away in postmasters' bank accounts or in
 18 stuffed mattresses, yet the Post Office and Fujitsu did
 19 not and/or would not hear any suggestion that Horizon
 20 was at fault.

21 The Inquiry has heard that the volume and value of
 22 these recoveries were closely monitored by the Post
 23 Office each year. Where did that money go? Did it
 24 simply appear on the Post Office's bottom line? So the
 25 Inquiry must consider whether staff, executives and

1 the Post Office as well: something you couldn't put
 2 a price on but which was incredibly valuable. They saw
 3 wealth as just monetary wealth and, as the old phrase
 4 goes, they knew the price of everything and the value of
 5 nothing.

6 It can take centuries to build something valuable,
 7 it only takes a relatively short time to seriously
 8 undermine it.

9 So to move to our conclusions, we are, sir, as ever,
 10 grateful for the opportunity to make these submissions
 11 today on behalf of each of the subpostmasters we
 12 represent while many of their stories have become part
 13 of the national narrative, many of them and their
 14 families remain intensely private people, irreparably
 15 damaged by their experiences at the hands of the Post
 16 Office. For a great many postmasters, it has taken
 17 a lot for them to be able to watch these proceedings and
 18 to see themselves in the spotlight.

19 The loss and the stigma that postmasters have lived
 20 with for decades does not disappear easily. They remain
 21 grateful for the work of the Inquiry so far, not only in
 22 further unearthing the dirty, difficult truth behind
 23 this scandal, but in pressing the Post Office and
 24 Government on their commitment to provide prompt, full
 25 and fair compensation, to try to ensure that offers that

1 senior managers at the Post Office and Fujitsu were
 2 motivated by commercial interest to the detriment of
 3 justice.

4 The Inquiry must consider whether those responsible
 5 for this scandal, in the Post Office, at Fujitsu, and in
 6 Government, did not, could not or would not hear any
 7 warning that Horizon lacked integrity because their ears
 8 were stuffed with cash.

9 Were they too busy thinking about wealth in purely
 10 monetary terms that they ignored or disregard the wealth
 11 of community? Those communities, such as South
 12 Warnborough, where Jo Hamilton had her Post Office,
 13 Gaerwen, where Noel Thomas had his, Dukinfield, where
 14 Della Robinson had her Post Office, those communities
 15 relied on the Post Office. Jo Hamilton kept the pension
 16 cards and PIN numbers of the elderly residents in
 17 a drawer at her branch so that she could look after
 18 them. All of that was something you couldn't put
 19 a price on but which was incredibly valuable. Post
 20 Office didn't and/or wouldn't see the wealth in that.

21 They ignored or disregard the wealth of reputation.
 22 They not only trashed the reputations of postmasters
 23 whom they dragged through the courts and imprisoned and
 24 bankrupted, by doing so, through this massive
 25 miscarriage of justice, they trashed the reputation of

1 are made to them are not, in the very recent words of
 2 Alan Bates, "derisory, offensive and after all this
 3 time, yes, cruel".

4 This phase highlights that the individual decision
 5 makers who failed in their responsibilities as
 6 prosecutors must be under a different but similarly
 7 bright spotlight, as must the shared failures of
 8 governance which lie behind this scandal. Anything less
 9 would neglect to ensure that lessons are learned for the
 10 future about the dangers which lie in the confluence of
 11 commercial interest, individual ambition and criminal
 12 injustice.

13 The cost of this scandal includes what may be
 14 irreparable damage to the Post Office in our community
 15 consciousness. The next stages of this Inquiry will
 16 focus further on the shared financial responsibility for
 17 redress, owed not only by Post Office and the public
 18 purse, but by Fujitsu. Those we represent do not wish
 19 to see any constructive steps to compensate all
 20 postmasters await any such attribution of responsible as
 21 may follow the evidence in this Inquiry.

22 Tragically, postmasters continued to die before any
 23 offer of full, fine and proper compensation. Others
 24 continue to grapple with delays in administration which
 25 is continuing their trauma and delaying yet further

1 their capacity to move on and enjoy the rest of their
2 lives.

3 Fujitsu accepts a moral responsibility to share the
4 load but it is vague about precisely what this means,
5 and we suggest that as it goes forward, the Inquiry
6 might consider the extent of any agreement reached
7 between Government, Post Office, and Fujitsu, as to any
8 legal course of action arising, their timing and whether
9 any such arrangements may have informed the approach to
10 the GLO and any strategic steps since, including
11 decisions on compensation.

12 While Fujitsu has voluntarily committed, with
13 seeming fanfare, to refrain from bids for public work
14 while the Inquiry continues, the Inquiry may wish to
15 examine the increasing commercial value and the
16 corresponding cost to the public purse of the
17 relationship between Fujitsu and Government over the
18 life of Horizon. There are lessons to be learned in the
19 relationship between Government and Fujitsu developed on
20 the back of Horizon. This may not only help explain why
21 Horizon was defended for so long but may inform the
22 Inquiry's recommendations for the future conduct of
23 public private contracting.

24 Moreover, those we represent expect to see criminal
25 prosecution pursued where the evidence warrants it. We

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1 role was played by Government, including the Government
2 representation on the Post Office Board?

3 Additionally, the treatment of Second Sight will be
4 a significant issue for Phase 5. There is now concrete
5 evidence that Post Office Management rejected any
6 question of closer scrutiny and independent
7 interrogation of Horizon as early as 2005. Each ignored
8 opportunity to interrogate Horizon represents years lost
9 to many of our clients. For others, an opportunity
10 missed could have prevented their loss and their pain
11 entirely. Justice delayed in this case truly was
12 justice denied.

13 Just as no rational person could believe that
14 Government and Parliament were in the dark about the
15 Post Office scandal before the airing of *Mr Bates* by
16 ITV, the board and the Post Office were not and cannot
17 have been uninformed of concerns about the flaws in
18 Horizon and the shortcomings of their own prosecutorial
19 conduct until the conclusion of the GLO.

20 Exploring and determining the extent of
21 responsibility for the continued seemingly determined
22 failure to acknowledge the devastating flaws both in
23 Horizon and in the Post Office's approach to prosecution
24 is critical for this Inquiry, central to our clients'
25 true understanding of what happened to them and

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1 welcome the decision of the chair to provide careful,
2 appropriate warnings against self-incrimination to
3 a number of witnesses.

4 The Phase 4 transcripts provide evidence which, at
5 the very least, justifies rigorous investigation of
6 possible offending in a number of cases. We note that
7 The Metropolitan Police Service is a Core Participant
8 and we understand they are monitoring these proceedings.
9 The integrity of any possible prosecution ought to be
10 closely guarded. It would be a devastating result for
11 those we represent and for the public interest should
12 any person liable to investigation, prosecution and
13 conviction escape or unnecessarily delay trial for
14 procedural reasons, no matter how spurious.

15 The evidence in Phase 4 provides a flavour of what
16 is to come in Phases 5 and 6. We ask that it includes,
17 firstly, why, if not for profit and commercial interest,
18 did the Post Office continue to turn a blind eye and
19 a deaf ear to the growing evidence of Horizon's flaws?
20 Just how was it allowed to do so in the face of the
21 involvement of Parliament and of independent reviews
22 conducted by Second Sight, Deloitte and individual
23 legal experts?

24 Why did Fujitsu continue, as it appears they did, to
25 support the stock line that Horizon was robust? What

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1 essential before lessons can truly be learned for the
2 future.

3 As ever, sir, we and those we represent will do all
4 we can to assist the Inquiry in finding out those
5 things.

6 **SIR WYN WILLIAMS:** Mr Moloney, thank you very much for your
7 submissions. Those of you who follow the Inquiry will
8 know that occasionally I congratulate Mr Moloney for the
9 accuracy of his predictions as to the length of his
10 submissions. On this occasion, he was within two or
11 three minutes of his prediction and that is a mark of
12 excellent advocacy, if I may say so.

13 We will take a break for 15 minutes and then I will
14 hear from Mr Stein, I take it.

15 Yes, so 11.30.

16 **MR BEER:** Yes, thank you very much, sir.

17 (11.15 am)

(A short break)

19 (11.30 am)

20 **MR BEER:** Sir, I think it's Mr Stein next.

21 **SIR WYN WILLIAMS:** Yes. Has there been a problem with me
22 being on screen there, Mr Beer?

23 **MR BEER:** No, not that I'm aware of.

24 **SIR WYN WILLIAMS:** All right. Thank you.

25 **Closing statement by MR STEIN**

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1 **MR STEIN:** Sir, Phase 4 has pulled back the curtain on the
 2 decades of the Great Post Office Cook-Up and Cover-Up.
 3 That has been made up of these four key ingredients:
 4 The disdain and dislike of subpostmasters by the Post
 5 Office and their employees because, and I quote from
 6 a Post Office Investigator, they are "all crooks";
 7 secondly, an appalling lack of professionalism of
 8 lawyers combined with bullying Investigators; thirdly,
 9 a refusal to investigate the Horizon system because of
 10 what that would reveal; and lastly and finally,
 11 fourthly, the Post Office cult -- the almighty Post
 12 Office must be protected at all costs.

13 Sir, what an awful cocktail, a Molotov cocktail,
 14 that they consistently over these decades threw at
 15 subpostmasters, their families, their managers and their
 16 staff, in doing so risking mental physical and economic
 17 health.

18 Sir, we suggest that the least we can expect of
 19 a publicly and taxpayer-funded organisations is that
 20 they will do right when no one is watching, not do what
 21 is unconscionable because they think nobody will find
 22 out.

23 Let me deal with the consistency of attitude towards
 24 subpostmasters. Phase 4 started in Phase 3. You will
 25 recall the statement -- and, sir, we will provide a copy

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1 allowed. Mr Pardoe said in his evidence to the Inquiry
 2 on 29 November last year:

3 "There was a persistent sentiment that the system
 4 was fit for purpose. I was never in a meeting when it
 5 was discussed with me, the concept of putting the brakes
 6 on prosecution activity. It's clear that there was
 7 a fear that to do that would immediately cast doubt on
 8 prosecutions that had been completed, that had gone
 9 before."

10 Mr Wilson, the Head of Criminal Law at the Post
 11 Office, sent an email on 3 March 2010, in which he told
 12 his colleagues:

13 "An investigation will be disclosable as undermining
 14 evidence on the defence in the cases proceeding through
 15 the criminal courts."

16 Going on to say:

17 "The potential impact, however, is much wider for
 18 POL, in that every office in the country will be seen to
 19 be operating a compromised system with untold damage to
 20 the business. To continue prosecuting alleged
 21 offenders, knowing that there is an ongoing
 22 investigation to determine the veracity of Horizon,
 23 could also be detrimental to the reputation of my team."

24 Anne Chambers told the Inquiry in her Phase 4
 25 evidence on 27 September 2023 that the Post Office's

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1 next week of my speaking notes, which will contain all
 2 references and, otherwise, I won't therefore refer in
 3 this speech to references today.

4 Sir, you will recall the statement of Susan Harding
 5 the designer of the IMPACT Programme in 2003 to 2006.
 6 The programme that largely removed the suspense account,
 7 meaning that, to balance, subpostmasters had to pay up
 8 and not dispute a shortfall.

9 At paragraph 31, page 7 of her statement, it says
 10 this:

11 "It was agreed during the design of IMPACT that the
 12 suspense account would be removed as, historically, it
 13 was used by subpostmasters to hide discrepancies in
 14 their accounts rather than resolve them."

15 In the questions asked of Ms Harding by Mr Beer
 16 King's Counsel on 22 February 2003, Ms Harding confirmed
 17 that she worked on the principle that, prior to Horizon,
 18 subpostmasters did have losses and hid those losses. We
 19 have seen through the evidence in Phase 4 that this has
 20 been the mindset that informed the actions taken by the
 21 Post Office against subpostmasters since the
 22 introduction of Horizon, essentially a mindset that was
 23 echoed through to Mr Thomas' slanderous email to
 24 Mr Graham Ward, who gave evidence yesterday, in 2015.

25 No investigation of the Horizon system could be

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1 priority in 2007, she was referring to, was not to
 2 assist subpostmasters. She said it was fairly clear
 3 that the Post Office were keen on defending the
 4 integrity of their system rather than trying to get of
 5 the bottom of issues, whether system problems or
 6 business problems, affecting individual branches.

7 Ms Chambers said that she'd expressed these views in
 8 a disregarded Afterthoughts document which she produced
 9 following Mr Castleton's case.

10 We mustn't forget the 2010 Receipts/Payments
 11 Mismatch Bug Meeting Notes document that we've looked at
 12 many times, the document described as dynamite by Debbie
 13 Stapel, which shows Post Office and Fujitsu joining
 14 forces to concoct unacceptable and disingenuous
 15 solutions in relation to one of the many bugs that
 16 plagued the system, leaving you, sir, to ask the
 17 question of witnesses: which one of those solutions were
 18 ever used?

19 Mr Ismay, Post Office's head of Product and Branch
 20 Accounting, set out his views in his whitewash report on
 21 2 August 2010, where he repeats, in essence, Mr Wilson's
 22 concern: adverse publicity and reputation and nothing
 23 about "Do the right thing".

24 He concluded that there should be no independent
 25 review of Horizon because this could lead to

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1 a perception that the Post Office cast doubts on its own
2 system.

3 In his evidence earlier in 2023, Mr Ismay stated
4 that, although his name was on the report, he hardly
5 accepted that these were his own words, stating:

6 "That narrative would have come from speaking to
7 somebody in the Criminal Law Team. I imagine it
8 probably came from a conversation with Mr Rob Wilson."

9 Mr Beer asked Mr Wilson about these matters in
10 October '23. Mr Beer's first question in relation to
11 this:

12 "Was it your view that the Post Office should just
13 grit its teeth and get on with prosecuting people?"

14 Mr Wilson:

15 "I think so, yes."

16 When Mr Pardoe was asked by ourselves on
17 29 November, at page 150 of the transcript, whether the
18 persistent sentiment that the system was fit for purpose
19 came from his boss, John Scott, he agreed that this was
20 the case:

21 "The one I remember probably with greater clarity is
22 the Paula Vennells communications", he said.

23 "I'm sure that that preceded known media interest
24 that was imminently about to go public."

25 Essentially saying, "Look folks, this is likely to

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1 this may set."

2 Going on to say:

3 "And that may be used by Post Office's agents to
4 support claims that the Horizon system is causing errors
5 in their branch accounts."

6 So the Post Office knew that the Horizon system was
7 defective but still sought to bring prosecutions of
8 subpostmasters, bring civil actions against postmasters
9 and refuse to investigate these issues because the
10 subpostmasters might catch on to the truth.

11 In Phase 4 we have seen a parade of liars, bullies,
12 amnesiacs and arrogant individuals give evidence before
13 you. This has been a mixed experience or many of our
14 clients.

15 Shazia Saddiq has said:

16 "I came to the inquiry to see my tormentor but he
17 wouldn't look me in the eye."

18 Indeed, in a lot of cases, our clients have been
19 appalled to see the extent to which Post Office staff
20 members treated subpostmasters as subhumans. They
21 hounded and harassed and, in some cases, drove decent
22 and honest men and women to their graves.

23 It has been noteworthy, we say, that for every
24 witness who has been brazen about their behaviour, there
25 have been others who have chosen to plead amnesia. We

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1 be out within the public domain and the approach we are
2 taking is this, this, this and this", to paraphrase.

3 Mr Jacobs took the point one further when he asked
4 this:

5 "So the whole organisation was told there's going to
6 be something in the media about Horizon and it is to be
7 disregarded because everything is robust?"

8 Mr Pardoe replied.

9 "I certainly recall reading a written rebuttal and
10 position that the business were adopting, yes."

11 For further insights into the Horizon cover-up we
12 should look at what was said in Mr Coyne's evidence in
13 July '23. Mr Coyne was a jointly instructed expert in
14 the Cleveleys case, so he is POL's expert. He advised
15 that the whole estate was suffering from problems.
16 Mr Moloney has dealt with this already in his
17 submissions today, recalling that Mr Coyne was called
18 a "git" for his troubles.

19 The Inquiry will also recall the letter in February
20 2004 which adds to this, in which Mr Keith Baines of the
21 Post Office wrote to Colin Lenton-Smith at Fujitsu and
22 said:

23 "As I'm sure you will understand, the Post Office is
24 concern by these findings, not only in relation to this
25 particular case but also because of any precedent that

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1 have witnessed, sir, a chorus of cowards who deny any
2 memory of involvement in this scandal.

3 Two stark examples of such amnesia are provided by
4 the evidence of Suzanne Winter and Lisa Allen
5 respectively. They claim to be unable to recall trials
6 in 2004 and 2007 which they attended and gave evidence,
7 notably those trials were where subpostmistresses were
8 found not guilty.

9 We have also heard from witnesses that have sought
10 to tell the Inquiry that the message from above was that
11 any complaints from subpostmasters about the Horizon
12 system was to be denied and that the system was robust:
13 a dishonest message, sir, that shows that honour has
14 been lost in the post at the Post Office.

15 We know, of course, that the Inquiry cannot make any
16 findings as to civil or criminal liability but our
17 clients take some small comfort in the fact that The
18 Metropolitan Police and Solicitors Regulation Authority
19 have followed the hearings closely.

20 The Post Office did not do all of this alone.
21 Fujitsu were complicit from the outset. Mr Patterson
22 told us on 19 January that Fujitsu knew about the bugs,
23 errors and defects for many years and right from the
24 very start of the deployment of the system.

25 Ms Munro acknowledged Fujitsu's complicity when

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1 answering questions from ourselves on 18 January this
2 year. She was asked whether she thought postmasters and
3 mistresses were being prosecuted in circumstances where
4 the Post Office, with Fujitsu's assistance, was
5 misrepresenting the robustness and integrity of the
6 Horizon system. Her answer was:

7 "Based on what I've seen and read today, I would say
8 yes."

9 Now, I turn to the question of remote access. In
10 doing so, I'm going to ask for the one document I'm
11 going to ask to go on to the screen to go on to the
12 screen, and that is FUJ00002023. Can we go, please, to
13 page 13 of 18, using the internal pagination at the
14 bottom and highlight, please, the paragraph at the top,
15 which is 2.7.1.5. Thank you.

16 Sir, in dealing, briefly, with the evidence that
17 relates to remote access, it is helpful to remind
18 ourselves of what was said in relation to the Horizon
19 system about third line and fourth line, the support
20 service. This document is dated, as we can see,
21 31 August 2006 and it sets out that:

22 "The Application Support Service (Fourth Line) and
23 Third Line Support Service work closely together in the
24 identification and resolution of Software Incidents
25 requiring bug fixes."

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1 Fujitsu, we say, chose to hide behind its contract,
2 actively supporting its contractual partner and
3 financial benefactor and getting a few more years of
4 public contracts adding to its £1 billion global empire.

5 The document can come down from the screen with my
6 thanks.

7 Let me turn to my clients' views. Scott Darlington
8 has summed up the experience of subpostmasters who have
9 followed Phase 4 perfectly. He said in an interview
10 that he gave to the BBC on 18 January:

11 "Once they knew that things were going wrong and the
12 system wasn't right, POL doubled down in their behaviour
13 against postmasters with Fujitsu acting in conjunction
14 with them. You know it wasn't you, you know it wasn't
15 your fault and when things start to come out in the
16 Inquiry, and we've realised that they did know, Post
17 Office's doubling down is like kick in the teeth and
18 they've done it time and time again."

19 Clients' views in relation to some of the evidence
20 that has been given.

21 Sarah Osolinski, who was a subpostmaster at Gaer
22 Park Post Office in Newport says:

23 "Gary Thomas is not a victim. He is a bully who
24 thoroughly enjoyed his role in bringing us down."

25 Of John Scott:

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1 That's what they did.

2 Let's add to that remote access.

3 In Phase 4, the Inquiry heard the evidence of Anne
4 Chambers in September, who accepted that there were
5 occasions where the Fujitsu team would use a branch user
6 ID when inserting transactions. In those circumstances,
7 the insertion would not be detectable. Of course,
8 Mr Roll told the Inquiry in March 2023 that the amount
9 of access to terminals that Fujitsu had was pretty
10 shocking. Furthermore, Mr Simpkins, a Fujitsu Team
11 Leader, confirmed in his evidence on 17 January that
12 there was unrestricted access to the live system and
13 that access seems to have been unaudited.

14 It is more than clear that, if Fujitsu and the Post
15 Office had come clear about the bugs, the purposes of
16 the helplines, the interactions, the fact that the teams
17 at 3 and 4 of the service line were fixing bugs in
18 combination with remote access -- if that had been
19 revealed in relation to any matters taken against
20 subpostmasters and mistresses in either civil or
21 criminal actions, any judge, having that brought to
22 their attention, would have required further and deeper
23 information.

24 This scandal could have been avoided if either the
25 Post Office or Fujitsu had done the right thing.

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1 "Don't write anything down and shred documents? How
2 dare they? This was people's lives they were messing
3 with. How could they?"

4 Sally Stringer, a subpostmistress at Beckford Stores
5 and Post Office in Beckford in Gloucestershire, her
6 comments echoed by every single one of our 157 clients
7 was this:

8 "To say I'm incandescent with anger about corporate
9 amnesia is an understatement."

10 Terence Seeneey said this:

11 "They were all underqualified bully boys. It's
12 surprising what people will do for money: sign false
13 statements, threaten people and ruin their lives and
14 that of their families, only promoted because they did
15 as they were instructed."

16 Let's put those comments into perspective. I'm
17 going to refer to some particularly bad witnesses, for
18 special mention, a rogues' gallery.

19 Gary Thomas, an Investigator who told our client,
20 Tracey Merritt, that she was the only one who had
21 complained about the system and, of course, his
22 notorious email to Graham Ward, his old Gunners Matt,
23 describing all subpostmasters and mistresses as
24 "thieving" and "crooks".

25 Mr Singh, who gave evidence on 30 November, referred

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1 to his email, already mentioned by Mr Moloney, a second
2 email he drafted in December 2013, carried the same
3 theme. This was some months after Mr Clarke had written
4 his advices, the lawyer at Cartwright King, and advising
5 then Post Office in writing that prosecutions that POL
6 had conducted had been obtained with misleading expert
7 evidence. Mr Singh wrote this:

8 "Any case begun now will attract some type of
9 Horizon issue because this is the passing bandwagon
10 people are jumping on. When we have a few more wins
11 under our belt the Horizon challenges will melt away
12 like midnight snow."

13 John Scott.

14 John Scott, as you will recall, sir, was the Head of
15 Security at the Post Office. He gave evidence on
16 11 October and what he said in his internal
17 communications was consideration of the Post Office
18 staff looking at Horizon integrity issues to shred
19 documents.

20 I pause there for one moment. In this matter, the
21 interface between subpostmasters, mistresses and their
22 staff and the Horizon system was largely conducted
23 through the helplines, of which there were two: the
24 Fujitsu helpline and the Post Office helpline. We have
25 sought to obtain disclosure of scripts now for the many

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1 Mr Bradshaw is a current Post Office Investigator at
2 POL. His behaviour towards subpostmasters and
3 mistresses was bullying, we say, and oppressive. Shazia
4 Sadiq was called a "bitch" by Mr Bradshaw on the phone.
5 He made Ms Rita Threlfall, who has mobility issues, use
6 a small parcel lift. He expressed no regret or remorse
7 for his behaviour in his evidence before the Inquiry
8 when he gave evidence on 11 January. Our clients would
9 like to know what action is being taken by the Post
10 Office in relation to Mr Bradshaw.

11 Mr Dilley, Stephen Dilley.

12 He was the Post Office's solicitor in the *Castleton*
13 case. He gave evidence on 21 September '23. He
14 accepted that the Post Office's priority in the
15 *Castleton* case was to send a message that Post Office
16 was willing to defend the Fujitsu Horizon system.

17 Then, of course, there's Mr Daily, who was the Post
18 Office Investigator who advised that Mr Holmes should be
19 prosecuted, conducting a very intrusive search of the
20 Holmes family home, looking for evidence of a Horizon
21 generated loss which the Post Office could never prove.

22 Mr Daily gave evidence on 23 January and confirmed
23 in response to questions from you, sir, that the
24 investigations that the Post Office conducted were very
25 extensive but revealed nothing. Yet this did not prompt

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1 years that we have been engaged on this particular
2 matter, the scripts of what was said at that interface,
3 otherwise known as "knowledge articles". That seems to
4 be the internal description of scripts.

5 Have those scripts gone into Mr Scott's corporate
6 shredder? Where are they? Maybe with Mr Jackson at the
7 helm of the latest set of Post Office lawyers, maybe
8 those scripts, knowledge articles, can be found.

9 But what was Mr Scott about? He didn't want notes
10 of minutes of meetings that discussed Horizon and we
11 suggest that, throughout this module, it has become
12 clear that the Security Department at the Post Office
13 worked as the Post Office's own Stasi, dedicated
14 reputational protection of the Post Office at all and
15 any cost.

16 Mandy Talbot.

17 She gave evidence on 28 September. She is a former
18 Post Office Legal Case Manager who was responsible for
19 civil actions but who deliberately inserted herself in
20 the wider dealings with Horizon cases, the Post Office's
21 very own "evil robot". She was aware that
22 subpostmasters were making allegations since 2001 but
23 chose to disregard Mr Coyne's expert evidence to the
24 effect that the system was not robust.

25 Stephen Bradshaw.

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1 him to follow the line of inquiry raised by Mr Holmes,
2 in other words that the Horizon system had been the
3 cause of the alleged shortfalls.

4 The case studies. We acknowledge that it has not
5 been easy for our clients, whose lives were directly
6 affected by the Phase 4 witnesses, to have to relive
7 what were highly traumatic experiences.

8 By way of example, Suzanne Palmer, who is here with
9 us today in this room, has described that the experience
10 of facing the witnesses who dealt with her was quite
11 traumatic. She says that part of her felt like she was
12 back in a dock with a policeman standing behind her.

13 Two of the case studies concerned acquittals. Our
14 acquitted clients are Maureen McKelvey and Suzanne
15 Palmer. It is notable that in both of these cases the
16 investigations were inadequate and the juries at trial
17 roundly rejected the Post Office's position as to the
18 robustness of the Horizon system.

19 Mrs McKelvey was the subpostmistress at Clanabogan,
20 a post office in Omagh, Northern Ireland. She was
21 prosecuted by the Post Office for theft and acquitted on
22 all counts by a jury in 2004. She raised Horizon issues
23 at her interviews with Ms Winter and Mr Thorpe in 2002
24 but those matters did not find their way into the
25 Investigator's report, which was submitted to the Police

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1 Service in Northern Ireland.
 2 Furthermore, the investigation report, written by
 3 Ms Winter, failed to inform the police service that one
 4 of the alleged acts of theft was a balance that had been
 5 carried out by Mrs McKelvey's Area Manager in her
 6 absence. Mrs McKelvey recalls that the trial judge was
 7 scathing towards the Post Office after the jury returned
 8 their acquittal and she recalls that the trial judge
 9 told the Post Office that the prosecution had been
 10 a sham.
 11 Sir, notwithstanding her acquittal and vindication,
 12 Mrs McKelvey became bankrupt as a result of what the
 13 Post Office did. She remains struggling to access
 14 compensation due to that very bankruptcy. Even though
 15 our client was acquitted so long ago, she continues to
 16 suffer today.
 17 Suzanne Palmer was a subpostmistress at The Grange
 18 Post Office in Rayleigh in Essex, acquitted of all
 19 counts of false accounting. In her interview she gave
 20 a detailed account of the technical problems she was
 21 experiencing with the Horizon system. However, these
 22 matters were not considered as relevant to the
 23 investigation that the Post Office conducted. Yet those
 24 points, raised by Mrs Palmer, were not lost on the jury.
 25 In her trial in 2007, the jury asked a highly
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1 on 12 December '23, he told the Inquiry that there would
 2 usually be a review undertaken by the Post Office when
 3 an acquittal was reported in a case that it had
 4 prosecuted.
 5 No review was conducted by the Post Office when
 6 Mrs McKelvey was acquitted in 2004 and when Suzanne
 7 Palmer was acquitted in 2007. We have seen that the
 8 Post Office was more than happy to crow about
 9 Mrs Misra's conviction in 2010, as evidenced by
 10 Mr Jarnail Singh's emails. But had it reviewed
 11 Mrs McKelvey and Mrs Palmer's acquittals, three and six
 12 years earlier, then maybe -- maybe -- the truth would
 13 have come out within the organisation.
 14 It was striking that when Mr Daily gave evidence on
 15 23 January in relation to the prosecution of Peter
 16 Holmes in 2010, he said he was unaware of any other case
 17 where a subpostmaster has alleged that Horizon was
 18 responsible for shortfalls.
 19 Ms Price, Counsel to the Inquiry, specifically asked
 20 Mr Daily whether he'd been made aware of Suzanne
 21 Palmer's acquittal and he denied any knowledge of the
 22 matter.
 23 We suggest that the evidence shows a deliberate
 24 corporate decision to not review acquittals --
 25 acquittals such as those of Maureen McKelvey and Suzanne
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1 pertinent question:
 2 "What was Mrs Palmer supposed to do if she didn't
 3 agree with the Horizon generated figures?"
 4 The Post Office Legal team were unable to answer
 5 that question. Mrs Palmer was acquitted approximately
 6 half an hour after the jury retired.
 7 Mr Atkinson King's Counsel has addressed
 8 Mrs Palmer's case at paragraphs 220 to 237 of volume 2
 9 of his report. He confirmed a number of important lines
 10 of inquiry, which had a particular tendency to exonerate
 11 rather than implicate Ms Palmer, were not pursued. None
 12 of these errors were identified by the reviewing lawyer,
 13 Mr Singh, who in fact advised that no further evidence
 14 was required. Mr Atkinson additionally advised that
 15 there was no review of the evidence when the decision to
 16 charge by Mr Singh was taken, neither was there any
 17 reference to the public interest test. Questions also
 18 arose, as Mr Atkinson examined, as to whether the
 19 disclosure process was adequately conducted.
 20 Notwithstanding her acquittal and exoneration by the
 21 jury, Mrs Palmer's life was still ruined by the Post
 22 Office. She too remains bankrupt to this day.
 23 There was a lack of review, as the Inquiry is aware,
 24 after the acquittals. When Rob Wilson, Head of Criminal
 25 Law Team at the Post Office, gave evidence in this phase
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1 Palmer -- for the simple reason that POL never wanted
 2 the truth to get out.
 3 I turn to now of the matter that related to Joan
 4 Bailey. Joan Bailey was the assistant to her husband,
 5 who was the subpostmaster for Howey in Wales. She
 6 received a caution after a shortfall was identified at
 7 an audit in January 2011. Mrs Bailey was particularly
 8 unfortunate because her case was handled under the
 9 Bradshaw-Singh axis. Her case is covered in
 10 Mr Atkinson's second report, paragraphs 444 to 458,
 11 saying there that Mrs Bailey and her solicitor raised
 12 the Horizon system at interview but Stephen Bradshaw,
 13 the Post Office Investigator, said:
 14 "Well, I can assure you that whatever glitches if
 15 there are any at the beginning with Horizon Next
 16 Generation has been solved. Right."
 17 Mr Bradshaw submitted an investigation report to
 18 Mr Singh but there was no proposal in that report that
 19 any enquiry should be made into the operation of the
 20 Horizon system at that branch.
 21 Mr Singh reviewed the case and followed
 22 Mr Bradshaw's suggestion that there should be a caution,
 23 but dependent on there being an undertaking from
 24 a solicitor that the Post Office would recoup the
 25 identified loss from a sale of Mrs Bailey's home.
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1 The evidence in her case shows that there was no
2 consideration of any of the issues with the Horizon
3 system that Mrs Bailey had identified. Mr Atkinson
4 correctly notes that this is pertinent because it would
5 have been appropriate to consider whether there was
6 sufficient evidence to prove the offence and whether it
7 was in the public interest even to caution Mrs Bailey,
8 as opposed to taking no criminal action against her at
9 all.

10 The decision to issue a caution without any
11 investigation into the accuracy of Horizon data upon
12 which reliance was placed, the lack of any financial
13 inquiry and the obvious financial motivation behind the
14 giving of a caution are all strong indicators that there
15 was a miscarriage of justice in Mrs Bailey's case.

16 However, unlike those who are convicted at the hands
17 of the Post Office, cautions cannot be overturned.
18 A caution may be challenged, by way of judicial review,
19 and therefore will be subject, because of JR time
20 limits, to the timeliness of a challenge. There are
21 procedures in Magistrates Courts to review the
22 administration of cautions, however these procedures are
23 unlikely to assist the victims of the Post Office, such
24 as Joan Bailey and Susan Hazzleton, many years after the
25 event.

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1 **MR STEIN:** Mr Holmes. Peter Holmes is a classic case of
2 a subpostmaster or assistant raising the issue of
3 Horizon from the very outset but Post Office
4 Investigators failing to follow up on a basic line of
5 inquiry. Mr Holmes was an assistant, actually the
6 *de facto* subpostmaster at Jesmond Post Office branch,
7 and pleaded guilty to four counts of false accounting in
8 December 2009.

9 Tragically, Peter, a former policeman of four years
10 and a man of impeccable character, died in the years
11 before the Court of Appeal finally cleared his name.
12 His prosecution was always an affront of justice, as the
13 Court of Appeal rightly found. Peter has been more than
14 ably represented by his widow, Marion. It must be
15 a great source of shame to the Post Office that its
16 employee, Mr Daily, was unable to provide any apology
17 for the part that he played in Peter's conviction and
18 the loss of his reputation.

19 It really beggars belief that Mr Daily didn't
20 consider having conducted an investigation into
21 Mr Holmes and, having uncovered absolutely nothing,
22 whether Mr Holmes was right when he blamed the "bloody
23 awful" Horizon system.

24 You will remember, sir, the long silence that
25 followed when you put this very point to Mr Daily on

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1 Mrs Bailey's caution, in fact, conflicted, we say,
2 with the Post Office's own policies because the flawed
3 investigation did not establish evidence of guilt
4 sufficient to give a realistic prospect of conviction.
5 We say that the administration of a caution to
6 Mrs Bailey was every bit as much of an abuse of process
7 as a conviction would have been.

8 In the absence of any obvious remedy, we invite the
9 Chair, you, sir, to make a robust finding in the final
10 Inquiry report that, if you were called upon to decide
11 this issue in a court, that the administration of
12 cautions to Mrs Bailey and others were an abuse of
13 process. This may enable, insomuch as it is possible,
14 for our clients' names to be cleared in at least
15 a public manner.

16 Move on to Mr Holmes.

17 **SIR WYN WILLIAMS:** I'm not trying to be difficult, Mr Stein,
18 but can I actually do that?

19 **MR STEIN:** Well, sir, yes, you can only make the comment.
20 You cannot make a determination. We ask that the
21 comment is --

22 **SIR WYN WILLIAMS:** I can stretch my powers in the Terms of
23 Reference to or beyond breaking point, yes?

24 **MR STEIN:** We ask you so to do, yes.

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

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1 23 January.

2 Mr Atkinson dealt with Mr Holmes' case at
3 paragraph 309 to 335 of his report. He noted that there
4 was no evidence of any Horizon checks, which is
5 consistent with the material that was in the evidence
6 schedules in the criminal proceedings and also with the
7 evidence that is before this Inquiry.

8 Mr Daily's protestations that such checks would have
9 been conducted are without any credibility. Once again,
10 the decision to charge was made without reference to any
11 public interest and did not set out how dishonesty was
12 said to be established. Mr Daily was a singularly
13 unimpressive witness.

14 What would Mr Holmes think himself? Peter would
15 have been horrified at the absence of proper lines of
16 inquiry, as an ex-police officer. He would have been
17 devastated to learn about the complete failure to pursue
18 lines of inquiry that pointed to the innocence of the
19 person under investigation.

20 Let me turn to the use of the subpostmaster
21 contract. It is important to remember that Phase 4, and
22 this Inquiry, is not solely concerned with prosecutions.
23 Hundreds, if not thousands, of subpostmasters were
24 hounded under the Post Office tyranny into paying
25 alleged shortfalls which had been generated by the

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1 Horizon system. The Post Office seems to have believed
 2 that its contract with subpostmasters entitled it to
 3 embezzle without proper investigation or even actual
 4 losses. Have we got to the bottom of where the
 5 subpostmasters' money went when they paid for
 6 shortfalls, as a result of the Horizon bugs, errors and
 7 defects in the system? Was it put into a separate and
 8 accountable account or simply stuffed back into the
 9 business?

10 John Breeden summarised the position from the
 11 contractual side in his evidence on 17 October '23. He
 12 accepted that the Post Office's protection of the brand
 13 image may have come at the expense of doing the right
 14 thing by subpostmasters. He described the Post Office's
 15 overwhelming desire was to protect the brand at all cost
 16 and that was part of the DNA of the business and, going
 17 on to say, that was dictated from the top,
 18 ie management.

19 The cultural sickness at the Post Office was
 20 embedded, we suggest, in its policies. Mr Lusher,
 21 another former Contracts Advisor, gave evidence on
 22 18 October to the effect that Post Office policy
 23 regarding losses wrongly assumed that all losses were
 24 the responsibility of the subpostmaster.

25 Subpostmasters were attacked from all sides. They
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1 Office could not prove any loss.

2 Fifth, there were systematic failings in the
 3 disclosure process at all levels.

4 Sixth, Post Office frequently imposed a requirement
 5 that pleas were accepted conditional upon an undertaking
 6 that no criticism would be made of the Horizon system.

7 Seventh, that the entire process was procedurally
 8 unfair. Where a company or organisation is the alleged
 9 victim, investigator and prosecutor, there will always
 10 be a tendency for a lack of balance and objectivity.
 11 Post Office had skin in the game in every case and there
 12 were no effective independent checks in place.

13 Eighth, the Post Office was driven by improper
 14 considerations. They wanted results in criminal
 15 prosecution and civil actions to bolster the failing
 16 Horizon system and to deter subpostmasters. They crowed
 17 when they won cases but failed to review cases where
 18 a defendant had been acquitted.

19 Finally, we ask you to look at all these matters
 20 altogether. We ask that you make what 10 years ago have
 21 been an astonishing and incredible finding, that these
 22 findings add up to a system that was biased against
 23 subpostmasters, a system that failed to investigate,
 24 a system that avoided self-analysis, a system which
 25 sought above all else to protect the holy Post Office
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1 were ruined by the contracts, which were incorrectly
 2 interpreted by the Post Office and which many
 3 subpostmasters never actually saw. They were unable to
 4 properly investigate the cause of the discrepancies or
 5 losses, due to their limited access to back office and
 6 accounting data within Horizon. It was, of course,
 7 always impossible for a subpostmaster to produce
 8 evidence that Horizon was the cause of an alleged loss
 9 and many Post Office Investigators appeared to think the
 10 subpostmasters were required to do just that.

11 We ask you to make the following findings in
 12 relation to this phase of the Inquiry:

13 Investigators systematically failed to pursue
 14 important lines of inquiry that appointed away from the
 15 guilt of subpostmasters. This was particularly apparent
 16 in cases where postmasters had experienced problems with
 17 the computer system or had raised those problems in
 18 interview or through legal representatives.

19 Secondly, there were failures of prosecutorial
 20 supervision as to the identification and pursuit of
 21 reasonable lines of inquiry.

22 Thirdly, there were failures to refer to the public
 23 interest in decisions to prosecute.

24 Fourth, in a substantial majority of cases, the
 25 shortfall concerned was Horizon generated and Post
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1 and regarded subpostmasters as, at best, an expendable
 2 cash resource.

3 What does all this mean? It remains the case that
 4 perhaps 80 per cent of the wrongfully convicted of the
 5 Post Office's victims have not come forward and there
 6 will be hundreds more of subpostmasters, mistresses,
 7 managers and staff, whose lives have been blighted by
 8 the threats of criminal actions, civil actions and
 9 employment issues whose cases remain untouched.

10 This scandal cannot be over until every Post Office
 11 victim is identified, every Post Office victim
 12 vindicated and every Post Office victim fully and
 13 properly compensated.

14 As to compensation, it needs to be paid and paid
 15 now. To those of you who are watching and who are
 16 thinking of coming forward, we urge you to do so. Seek
 17 assistance with overturning your conviction, unpicking
 18 your bankruptcy or IVA and access the compensation to
 19 which you are entitled. We suggest that you have
 20 nothing to fear any more from the Post Office. They
 21 have been discredited, they have been beaten, and they
 22 cannot hurt you any more.

23 Two weeks ago, we asked of Mr Patterson, the UK and
 24 European Director of Fujitsu, whether Fujitsu will
 25 commit to compensation of subpostmasters and he agreed
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1 that the establishment of a fund to support
2 subpostmasters and their families in future education
3 and entrepreneurial endeavours would be a good idea.

4 We asked that question openly, on record, under the
5 public gaze, as our clients have learnt that no one in
6 this sorry saga can be trusted, so we must get
7 commitments on the record.

8 Now, given that Fujitsu, it appears, has only just
9 woken up to its own responsibility to subpostmasters,
10 the working out of the details of such a scheme will
11 take time, but we ask Fujitsu to turn this good idea
12 into a good reality. We need to acknowledge the
13 importance of the Inquiry, and our independent press
14 and, indeed, the general public in continuing to hold
15 the Post Office, Fujitsu and the Government to account.

16 Marion Holmes told me last week that, unless this
17 tragedy is kept in the public eye, it would die again,
18 as it appeared to have done before her husband's
19 conviction was overturned.

20 Lastly, sir, our brave and remarkable clients would
21 wish to thank you, sir, and the excellent Inquiry Team
22 for their invaluable work in this Inquiry. Phase 5 will
23 draw back the corporate veil yet further and reveal
24 greater details of the scandal and the extent of the
25 cover-up.

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1 the exemplary way in which advocates are keeping to time
2 limits, we've got about three-quarters of an hour left
3 in total, so I'm very happy to have a few minutes' break
4 and then we will complete the next two submissions.

5 **MS WATT:** Thank you, sir.

6 **SIR WYN WILLIAMS:** So we will start again at 12.30. Fine.
7 (12.23 am)

8 (A short break)

9 (12.30 pm)

10 **Closing statement by MS WATT**

11 **MS WATT:** Good afternoon, sir.

12 **SIR WYN WILLIAMS:** Good afternoon.

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

14 The National Federation of SubPostmasters is
15 grateful for the Inquiry's permission to make oral
16 closing submissions on the evidence heard in Phase 4.

17 The NFSP of today once again takes this opportunity
18 to confirm to this most important of public inquiries
19 that it is committed to assisting the Inquiry in any way
20 it can. It has watched carefully the Phase 4 throughout
21 and submitted questions for witnesses for Counsel to the
22 Inquiry throughout.

23 It wants the Inquiry to shine a light where there
24 have been lies, deception and potential criminality and,
25 of course, that is a reference to the actions of the

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1 Sir, as ever, we look forward to assisting the
2 Inquiry in that phase.

3 Sir, I don't know whether I achieved the accolade of
4 excellence regarding timing but those are our
5 submissions.

6 **SIR WYN WILLIAMS:** Well, in terms of your prediction of
7 length, certainly, Mr Stein: a model, if I may say so.

8 Thank you very much for your submissions.

9 **MR STEIN:** Sir.

10 **SIR WYN WILLIAMS:** So next is Ms Watt, I gather, Mr Beer?

11 **MR BEER:** Yes, that's right, sir.

12 **SIR WYN WILLIAMS:** Can I ask her whether she would like to
13 go now or whether she would like a few minutes' break?

14 **MS WATT:** Sir, I'm in your hands, if it suits you to have
15 a few minutes --

16 **SIR WYN WILLIAMS:** I'm sorry, you're going to have to repeat
17 that. I didn't catch it.

18 **MS WATT:** Can you hear me now?

19 **SIR WYN WILLIAMS:** Only just.

20 **MS WATT:** How about that? Oh, I think that's me now.

21 **SIR WYN WILLIAMS:** Yes, definitely now.

22 **MS WATT:** Thank you. I'm in your hands, sir, whichever
23 would suit. It may be a few minutes would suit but I am
24 happy to go.

25 **SIR WYN WILLIAMS:** Well, fine. All I'd say is that, given

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1 Post Office and Fujitsu and not the hundreds of
2 subpostmasters, assistants, Crown Office employees who
3 the Post Office so wrongly, and knowingly wrongly,
4 pursued through the courts with such great vigour.

5 It is no exaggeration to say that the evidence
6 throughout Phase 4, taken either individually or
7 collectively, has been nothing short of extraordinary,
8 but not in a good way: extraordinary in its often
9 deliberate obfuscation. I use that word advisedly: the
10 action of making something obscure, unclear or
11 unintelligible, and several, indeed many, candidates
12 dates for that immediately confirm to mind.

13 Obfuscation, in that never have so many failed to
14 remember so much about what was their daily job, or even
15 their previous jobs, or about their employer, or even
16 who was in their team, or even what their team was
17 called, or who led it, or, crucially, who told them
18 there was nothing wrong with Horizon, or anything at all
19 about those whose lives they had ruined.

20 Apparently, it's just one big collective memory
21 failure: "I don't remember, I can't recall", from one
22 witness after another. Their evidence could be
23 described as a collective "See no evil, hear no evil,
24 speak no evil". Unfortunately, the fourth element of
25 that ancient saying was simply not present anywhere in

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1 the Post Office: do no evil.

2 Alongside that, ran the refrain "It wasn't me" or
3 "It wasn't my job" or "It was someone else's job but
4 I can't remember who".

5 The colloquial version of the Scots criminal law
6 defence of incrimination sums it up perfectly: It wisnae
7 me, a big boy done it and ran away.

8 Extraordinary in that some -- and some might say
9 a lot -- of what was heard simply defied belief: witness
10 statements as evidence for court proceedings being
11 signed as truthful by witnesses who didn't even write
12 those statements; so-called experts being instructed,
13 without having the requisite expertise or, even if they
14 did, without being given all the relevant information;
15 witnesses who today think that those they investigated
16 and whose convictions were quashed in the criminal
17 appeal courts are actually still guilty.

18 So it was, on the basis of the way these people did
19 their jobs, whether it was on the computer side of
20 things, technical support, software, legal, auditing,
21 investigating and prosecuting, that hundreds were
22 wrongly convicted and had their lives ruined.

23 Over and above those convictions, there are all of
24 those, including the convicted, who paid money to the
25 Post Office for the alleged shortfalls. Again, pursued

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1 others and campaigning on the speeding up of the
2 quashing of criminal convictions, compensation, the
3 Horizon Shortfall Scheme, while also trying to ensure
4 that Post Office branches up and down the land are
5 supported by the public and not boycotted due to the
6 damage that has been done to the words "Post Office" as
7 a result of this scandal.

8 Whatever some have said about the past, the one
9 thing the NFSP of today can say loud and clear is that
10 it is prepared, wherever and whenever necessary, to
11 publicly criticise the Post Office and it does so here
12 today, loud and clear.

13 In terms of disclosure, it's submitted that Phase 4
14 has highlighted, and indeed the Inquiry has been plagued
15 by, the Post Office's disclosure failures. There's the
16 original failure to fully and properly comply with their
17 disclosure obligations under earlier Rule 9 requests,
18 and the ongoing failure, for whatever reasons, to
19 provide documents which are relevant not only to
20 forthcoming phases but which may have been relevant to
21 this and previous phases.

22 It appears from the Phase 4 evidence that there is
23 a culture within the Post Office and those who work with
24 them that understanding and ensuring that proper
25 disclosure has occurred is always someone else's

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1 with a level of vigour that is almost indescribable.

2 Where is that money? It must amount to tens of
3 thousands, if not millions of pounds, apparently all in
4 the pocket of the Post Office. Was it funding their
5 bonus or just going into the bottom line of profits?

6 As a result of the way in which many of these
7 witnesses gave their evidence and disclosure failures
8 throughout, it is submitted there must be a concern as
9 to how it is that the Inquiry and you, sir, can get to
10 the bottom of all of this. However, the NFSP has faith
11 in the clear, dogged and forensic way in which the
12 Inquiry is working and is determined to assist it
13 wherever it can.

14 While the NFSP was among those lied to on
15 an industrial scale by the Post Office about Horizon for
16 many years, the NFSP of today knows that its commitment
17 to engagement in the forthcoming Phase 5 will shine
18 a light of all of those involved in the response to the
19 scandal as it emerged. It stands ready to acknowledge
20 and accept where the organisation of yesterday failed.
21 It welcomes the opportunity to deal with that alongside
22 those of others involved, including the courts, unions
23 and representative bodies and other organisational
24 bodies.

25 The NFSP of today is committed to working with

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1 responsibility, and then to blame others when it has not
2 occurred.

3 Investigators, including the Head of Security, blame
4 the Criminal Law Team, despite usually being Disclosure
5 Officers themselves, see, for instance, the evidence of
6 Stephen Bradshaw, on 11 January and also Tony Marsh on
7 5 July. The Post Office Criminal Law Team allegedly
8 relied upon the Investigators, their reports and their
9 disclosure schedule, despite having their own duties in
10 relation to disclosure, see, for instance, the evidence
11 of Rob Wilson on the 12 October.

12 The external Legal Team blamed the Post Office's
13 instructions regarding this, see the evidence of Andrew
14 Bolc on 15 December, and expected to be told if there
15 was a problem.

16 All of this, despite the duty to ensure that all
17 disclosable documents were made available to the court,
18 and, as a result of the failures by the Post Office
19 either to obtain all of the relevant and necessary
20 documents, which would, for instance, show transactions
21 or to fully disclose what was known about Horizon, or
22 both of those things, postmasters and others accused of
23 theft, embezzlement, false accounting and other crimes
24 and those representing them didn't stand a chance of
25 proving their innocence.

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1 The NFSP believes the evidence shows that the Post
2 Office and those instructed by them to pursue action
3 against Horizon users failed to provide full disclosure
4 to those subject to investigations and court actions.
5 They've failed to provide full disclosure to those they
6 investigated, especially if they were not represented,
7 see the evidence of Tony Marsh on 5 July and more
8 recently Robert Daily on 23 January.

9 The NFSP considers that this evidence shows the Post
10 Office has a past and ongoing issue with disclosure. In
11 respect of how they investigated and prosecuted
12 subpostmasters and others, there was the failure to
13 routinely recover ARQ data due to the annual limit
14 imposed contractually, beyond which the Post Office
15 would have to have made payment to Fujitsu, see, for
16 instance, the evidence of Natasha Bernard on
17 10 November, Debbie Stapel on 14 November, Tony Utting
18 on 17 November and Mike Wilcox on 7 December, and that
19 was despite the knowledge that this vitally important
20 data, if disclosed, would allow a cross-check with the
21 transactions the postmaster said had taken place.

22 The NFSP submits that it is frankly unacceptable
23 that the Post Office's failures in disclosure have
24 significantly and repeatedly delayed the hearing of key
25 witnesses, such as Gareth Jenkins, and have allowed

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1 significant and continuing failures could only occur in
2 an environment where there is widespread incompetence,
3 potentially deliberately bought about by having the
4 wrong people in the wrong jobs, as was seen in much of
5 the evidence here.

6 Entrenchment, and possibly the Inquiry may find,
7 even dishonesty, although the obfuscation referred to
8 earlier is ensuring that, wherever dishonesty occurred,
9 it will be difficult to bring it to light.

10 In relation to entrenchment, the NFSP considers the
11 evidence shows there seems to have been a failure by all
12 of those, externally as well as internally, involved in
13 investigations and prosecutions against Horizon, to
14 consider the immense power that the Post Office held as
15 victim, judge, jury and, effectively, executioner.

16 The Post Office were the ones who gained when
17 Horizon users were ordered to pay back the so-called
18 shortfalls, which were not in fact owed. They were the
19 ones who conducted audits and investigations and they
20 were the ones who prosecuted individuals or made the
21 referral and provided the material to those that did.
22 Instead of always having in mind that this power came
23 with responsibility, it is submitted that the evidence
24 in this phase shows that the Post Office seems to have
25 focused on ensuring the power -- I'm sorry, sir, I just

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1 others witnesses to claim that policies and procedures
2 were in place that were not available to the Inquiry for
3 us to see.

4 Given that this Inquiry, with its statutory powers,
5 threat of sanctions and public scrutiny, has struggled
6 to get the Post Office to comply with disclosure
7 obligations, the NFSP is concerned that, once this
8 Inquiry has concluded, the Post Office will continue to
9 fail to provide proper disclosure to those undergoing
10 investigations or in other proceedings.

11 The NFSP is therefore concerned that this cultural
12 attitude within the Post Office will prevail and will
13 continue to adversely affect NFSP members, other
14 postmasters, Crown Office employees, managers and
15 assistants in the future and, without the ongoing
16 scrutiny of a public Inquiry, there will be no person or
17 organisation with enough power or resources to hold the
18 Post Office to account on a daily and ongoing basis.

19 This is the experience of the NFSP today in its
20 dealings with the Post Office, and it notes the Inquiry
21 may address this in Phase 7 when considering
22 recommendations about the future of the Post Office.

23 Looking at what we describe as incompetence,
24 entrenchment, investigations and prosecutions, it is the
25 submission of the NFSP that the level of decades of

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1 lost my place there -- the power they had was retained
2 and unchallengeable, through making examples of those
3 who challenged Horizon to deter others from making
4 allegations.

5 See, for example, the now infamous and often
6 mentioned here Horizon bashing email from Jarnail Singh
7 to Mandy Talbot and others regarding Seema Misra's case
8 on 21 October 2010, that's POL0009368 [*Incorrect URN*] at
9 page 5; the email from Stephen Dilley to Mandy Talbot,
10 regarding Lee Castleton, dated 5 May 2009, that's
11 POL00070237; the email from Jarnail Singh to David
12 Oliver re current prosecution, POL00141653 at page 2;
13 the Helen Rose report, dated 30 August 2012, that's
14 FUJ00156648 at page 5; and the email from Mandy Talbot
15 to Marie Cockett and others "Re Castleton, Marine
16 Drive", dated 9 November 2006, POL00113909 at page 5.

17 Also suppressing knowledge of issues within Horizon,
18 including disclosure failures, for example the Helen
19 Rose report on Lepton SPSO; putting the onus on those
20 accused of having shortfalls to identify errors and then
21 removing their ability to substantiate or investigate
22 their concerns by limiting the data available to them or
23 locking them out of their branch; and circumventing
24 obligations and duties that would expose knowledge of
25 bugs, errors and defects.

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1 The NFSP has found it extraordinary that, amongst
 2 the people involved in action against Horizon users,
 3 there seem to be a refusal to consider the Horizon
 4 users' point of view or evidence pointing away from
 5 culpability. This is demonstrated through suspicion
 6 without proof, see the evidence of Elaine Cottam on
 7 7 November, at pages 36 to 37 of the transcript, the
 8 fact that postmasters were suspended immediately upon
 9 audit, even if they had been asking for help and had
 10 requested the audit, and the refusal to disclose
 11 relevant material to the defence as discussed
 12 previously.

13 In addition, it is concerning that Andrew Bolc
 14 dismissed the obtaining of ARQ data and asking Gareth
 15 Jenkins to discount a possible explanation for losses,
 16 rather than seeking to pursue a reasonable line of
 17 inquiry and investigating a potential explanation, see
 18 the email from Andrew Bolc to Gareth Jenkins "Re Sefton
 19 and Nield", dated 3 December 2012 at page 2, that's
 20 POL00089394.

21 The NFSP has found it shocking to learn that
 22 Investigators received a bonus for individual
 23 performance and their performance objectives included
 24 a target for recovery of funds, which the NFSP considers
 25 must have been from the postmasters and others who were

1 an assumption of criminality or guilt pervaded
 2 investigated each process. The NFSP believes the
 3 evidence shows that the culture of the Post Office's
 4 Auditors, Investigators and Prosecutors, of assuming
 5 Horizon guilt, was so entrenched, so pervasive, that
 6 some of those involved in prosecutions which have
 7 subsequently been overturned believe the Horizon users
 8 were still guilty today. That was the evidence of
 9 Raymond Grant on 25 January.

10 It's submitted that the entrenchment of individuals
 11 involved in actions against Horizon users and a refusal
 12 to consider the other side is also demonstrated in the
 13 language they used, for example: Jarnail Singh's email,
 14 "We were able to destroy the criminal standard of
 15 proof", interview transcripts with assertions made to
 16 the postmaster "You're lying to us again and again and
 17 you have told me a pack of lies".

18 There was also the shocking statement that
 19 "Postmasters were getting support for the contention
 20 that Horizon is the cause of all evil and that they were
 21 the perfect postmasters", which came from Mandy Talbot
 22 in an email to Michele Graves "re Eleanor Dixon" dated
 23 6 January 2010, that's POL00053778 at page 5. The NFSP
 24 believes this is also demonstrated through the language
 25 used within files and policies that assume guilt or are

1 being investigated for alleged Horizon shortfalls.

2 Investigators were tasked with looking into all of
 3 the evidence supporting and against the existence of the
 4 shortfall, and the reason for that shortfall, and
 5 providing the information uncovered in their
 6 investigations to those pursuing actions against Horizon
 7 users. Yet they had a vested interest in concluding
 8 that the shortfall existed and in concluding that the
 9 shortfall was the Horizon user's fault, and therefore
 10 recoverable.

11 It is, therefore, perhaps not entirely surprising
 12 that Investigators, such as Mr Daily, for instance,
 13 decided only to request ARQ data where he thought it
 14 would support the prosecution case.

15 The NFSP submits that the evidence in Phase 4 shows
 16 the words "investigations", "audits" and "prosecutions"
 17 are misnomers. All of these, properly done, should be
 18 aimed the finding the truth and recovering all available
 19 evidence. Here, the evidence that supported the Post
 20 Office's ability to prosecute and recover funds came
 21 from Horizon and, effectively, barriers were in place
 22 which prevented the recovery of evidence that could
 23 support those whose balances were showing shortfalls or
 24 who were accused of wrongdoing.

25 It is submitted that the evidence has shown

1 otherwise detrimental, such as policies having a section
 2 on prosecuting criminals, the compiling of offender
 3 reports and, of course, the despicable racist
 4 identification codes document.

5 Although such language was often dismissed by those
 6 responsible for it as "clumsy", the purported position
 7 that this did not reflect the mindset of the
 8 organisation or those using the language must, in the
 9 NFSP's view, be disingenuous at the least. Indeed, it is
 10 noted that the language about Horizon bashing was not
 11 uncommon at every level.

12 The NFSP believes that the consistent use of
 13 language assuming guilt and dismissing the Horizon
 14 user's concerns reflects an institutional mindset that
 15 is detrimental to Horizon users.

16 It is submitted that there seems to be a pattern of
 17 the Post Office valuing business considerations and the
 18 ability to recover funds, whether or not actually owed
 19 to them, over the truth, their duties to the court and
 20 to justice.

21 The NFSP was concerned to hear that business
 22 considerations played a role in the decision whether or
 23 not to prosecute an individual and that their external
 24 solicitors do not remember challenging this when it was
 25 identified.

1 The NFSP has been shocked by the displays of
2 incompetence by some of those giving evidence to the
3 Inquiry. In particular, the evidence of Elaine Cottam
4 and Jarnail Singh call into question the Post Office's
5 and their lawyers' understanding of basic concepts, such
6 as how to answer questions in a witness statement and
7 whether information that is not written down is
8 disclosable.

9 The NFSP was also appalled to hear the evidence of
10 Helen Rose regarding her audit report and witness
11 statements concerning Lee Castleton. It is unacceptable
12 that Ms Rose told the court, on the basis of a blank
13 template, that a number of failures applied in this
14 matter, such as the safe being left open, when this was
15 not the case. It is unacceptable that she went on to
16 try and undermine Mr Castleton's character by telling
17 the court he smelt of alcohol when this was not recorded
18 within the contemporaneous documentation and was not
19 true. It is also unacceptable that, when asked by the
20 Inquiry why she included these within her witness
21 statement to the court, she just said she couldn't
22 remember why.

23 The NFSP submits that this demonstrates
24 a fundamental disregard for ensuring that she was
25 fulfilling her duty to the court and begs the question

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1 Touching on legal obligations, another key concern
2 for the NFSP that has emerged from Phase 4 is that those
3 involved in progressing investigations, prosecutions and
4 other processes within and on behalf of the Post Office
5 appear to have gone beyond failing to comply with their
6 legal obligations by omission.

7 The NFSP submits that one example of this was
8 an apparent attempt to minimise or destroy written
9 information about issues with Horizon. This seemed to
10 have been based on an idea that, if information was not
11 written down, it did not have to be disclosed.

12 The NFSP is appalled to hear that not only were
13 those who were dealing with taking action against
14 Horizon users told to reduce electronic correspondence
15 regarding Horizon issues, for instance the evidence of
16 the witness John Scott, and not to take minutes in
17 relevant meetings, but that people were also told that
18 typed minutes should be scrapped and that it was implied
19 that minutes should be shredded.

20 The NFSP considers that the Post Office must explain
21 to the Inquiry and the victims of Horizon why they did
22 not change practices in the light of the advice provided
23 by Simon Clarke on 2 August 2013, see advice on
24 disclosure and the duty to record and retain material by
25 Simon Clarke, dated 2 August 2013, that's POL00006799.

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1 whether there was anything that those involved in
2 actions against Horizon users weren't willing to do in
3 order to make an example of those challenging Horizon
4 and ensure that prosecutions and the recovery of funds
5 could continue.

6 It seemed that Ms Rose was unapologetic for her
7 significant part in a case which had life altering
8 consequences.

9 This also appeared to be the case for Mr Singh, who,
10 despite being advised that Gareth Jenkins' role as
11 an expert witness had been discredited and that there
12 were instances where the Post Office had breached their
13 disclosure obligations, provided a quotation to the Post
14 Office's Public Affairs Manager, that it is submitted he
15 knew must be untrue, to allow the Post Office to defend
16 Horizon to the public.

17 He seemed equally unapologetic for his part in his
18 role as Head of Criminal Law, or whatever the title may
19 have been: Mr Singh seemed not to be able to remember.
20 Instead, he compared himself as aggrieved, in the same
21 way as victims of Horizon were, because he was in
22 a position to do something and he didn't. His evidence
23 and that of Elaine Cottam was shocking in its
24 incoherence and, whether deliberate or not, adds to the
25 obfuscation created by so much of the witness evidence.

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1 It's also submitted that the apparent attempt to
2 avoid disclosure of weaknesses in cases against Horizon
3 can be seen in the difference between an offender report
4 and a discipline report. For instance, significant
5 failures in accurate, supervision, procedures and
6 product integrity had to be kept in the offender report,
7 which was then kept confidential as it was considered to
8 be subject to legal privilege.

9 However, those failures were explicitly not
10 contained within the discipline report, which was
11 disclosed to the person being investigated and,
12 therefore, could have an impact on the ability to
13 prosecute and the reputation or security of the Post
14 Office.

15 The NFSP was shocked to hear the evidence of Elaine
16 Cottam and Stephen Bradshaw that witness statements
17 signed by them and submitted as evidence in court
18 proceedings were, in fact, drafted by others and were
19 not their words.

20 Finally, in relation to legal duties, the NFSP was
21 shocked to hear that there was quite a common practice
22 by the Criminal Law Team that there would be a charge of
23 theft and then also charges of false accounting, even
24 when the Post Office's own Investigators concluded that
25 there was no evidence of theft in relation to

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1 a shortfall. There was evidence from David Pardoe on
2 that, Diane Matthews and others.

3 It is the NFSP's understanding that a prosecutor
4 cannot and should not raise a charge where there is not
5 sufficient evidence to support that charge. It is
6 submitted that there is evidence before the Inquiry
7 which appears to show that the threat of a conviction of
8 theft was used as a threat to encourage those subject to
9 prosecutions to make a guilty plea to the alternative
10 charge of false accounting.

11 In relation to criminal proceedings in Scotland, the
12 NFSP notes that, while it was for the Procurator Fiscal
13 to take the decision on criminal proceedings, they were
14 wholly reliant on the Post Office as a reporter and
15 a Specialist Reporting Agency to provide all relevant
16 evidence and to follow the guidance and training given
17 to them by the Crown Office and Procurator Fiscal
18 Service.

19 The continuation of legal proceedings despite known
20 issues.

21 Therefore, it seems clear to the NFSP, on the
22 evidence heard, that the attitude of the Post Office and
23 those instructed by them in relation to action against
24 Horizon users appears to have been to continue with
25 legal proceedings despite known issues with Horizon.

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1 had been completed before, see the evidence of David
2 Pardoe on 29 November.

3 It seems perverse to the NFSP that a prosecutor
4 would not investigate the robustness of evidence it
5 relied upon when it was aware of issues, simply in order
6 to keep prosecuting and to ensure that previous possibly
7 erroneous prosecutions were not reviewed or called into
8 question.

9 In closing, sir, the NFSP believes that, as a result
10 of the action and failures of the Post Office in
11 effectively creating the Horizon scandal, the Post
12 Office have tarnished this once most trusted of brands.
13 The NFSP is therefore concerned about the impact of this
14 on its members and other postmasters who have invested
15 in this Network and also the relationship it must have
16 with the Post Office to protect their members'
17 investment.

18 The NFSP considers the evidence so far demonstrates
19 a pervading culture of cover-up, incompetence, knowingly
20 doing wrong in relation to prosecutions and
21 an entrenchment of placing corporate considerations
22 above legal obligations and human decency.

23 The NFSP is concerned about how postmasters, their
24 assistants and staff, Crown Office employees and their
25 respective representative bodies are meant to have trust

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1 The NFSP submits that it is clear through the Helen Rose
2 report, the associated correspondence with this and
3 Simon Clarke's related advice, that the Post Office were
4 aware that there were concerns that the data relied upon
5 in prosecutions would not be giving a true picture, and
6 it appears from the evidence that the Post Office were
7 aware Gareth Jenkins knew of Horizon issues at the time.

8 It seems to the NFSP that, at least partially as
9 a result of the likely impact of an investigation on the
10 ability of the Post Office to prosecute postmasters and
11 others, the proposed independent review by an external
12 organisation, such as Ernst & Young, did not occur.
13 Instead, the Rod Ismay report, a supposedly independent
14 report but which ended up looking only at evidence
15 supporting the robustness of Horizon, was commissioned,
16 see the evidence of Rod Ismay on 11 May.

17 On the basis of this, Mr Wilson's position that the
18 Post Office should "grit its teeth and get on with it
19 shows" that the Post Office prioritised the ability to
20 be able to prosecute above investigating known concerns.

21 In addition, the NFSP submits that it was
22 unacceptable that those within the Post Office, who by
23 then knew of Horizon integrity issues, did not have
24 discussions about pausing prosecutions due to the fear
25 this would immediately cast doubt on prosecutions that

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1 in their ongoing relationship with a huge and powerful
2 organisation which has not, so far, on the evidence
3 demonstrated the fundamental cultural and moral change
4 which is necessary as a result of the miscarriages of
5 justice.

6 In that regard, the NFSP looks forward to the
7 Inquiry's recommendations for the future in Phase 7.

8 I believe that concludes my submissions, just within
9 30 minutes, sir.

10 **SIR WYN WILLIAMS:** Well, you too are to be warmly
11 congratulated on the quality of your submissions and
12 your predictive powers.

13 So that leaves Mr Munro.

14 **MR MUNRO:** Thank you, sir. I wonder if I can be heard, sir?

15 **SIR WYN WILLIAMS:** It's not very loud at the moment it needs
16 to be amplified.

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

18 **SIR WYN WILLIAMS:** There we go.

19 Closing statement by MR MUNRO

20 **MR MUNRO:** Thank you.

21 Sir, thus far, there have only been a handful of
22 successful appeals against Horizon convictions in
23 Scotland. Our client, Susan Sinclair, was the first to
24 see her conviction overturned. Following a POL
25 investigation and report, Ms Sinclair was prosecuted by

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1 the Scottish Public Prosecutor, COPFS, on a charge of
2 common law embezzlement in 2003. She was found guilty
3 after trial in 2004. It appears, on the evidence that
4 this Inquiry has heard, that COPFS only became
5 institutionally aware of material concerns about the
6 reliability of Horizon evidence in 2013 but it took
7 a far-reaching investigation by the Scottish Criminal
8 Cases Review Commission, the SCCRC, before Ms Sinclair's
9 case was referred to the High Court of Justiciary in
10 November 2002. Her appeal was finally allowed on
11 29 September last year.

12 Ms Sinclair sought and was granted Core Participant
13 status on 17 November 2023, long after this Inquiry and,
14 indeed, this phase began.

15 In light of that, those who have spoken powerfully
16 before me are in a far better position to make
17 submissions on the totality of the Phase 4 evidence,
18 insofar as it concerns audits and investigations,
19 preparation of cases for prosecution, failures in
20 disclosure on the part of POL. Likewise, I recognise
21 that this Inquiry has heard of the harrowing experiences
22 of countless SPMs, whose lives were ruined by false
23 accusations and the events which followed.

24 I do not seek to add anything to what others have
25 already forcefully said. My focus, in the brief time

1 Did, then, the involvement of the Public Prosecutor
2 make any practical difference? I respectfully suggest
3 that, on the face of it, the answer to that question is
4 no. The failure of POL to reveal issues with Horizon
5 meant, at least until 2013, that cases were prosecuted
6 on the same evidential understanding as elsewhere.
7 COPFS relied on investigation reports in making
8 prosecutorial decisions. We heard that from the
9 evidence of David Teale, INQ00001120 at page 7.

10 There has been no indication, as I understand it, on
11 the evidence that was led before the Inquiry, of POL
12 being actively interrogated it by COPFS on the basis for
13 prosecutions or being directed to provide further
14 evidence.

15 Now, one may have hoped that the involvement of
16 a single independent prosecutor would have highlighted
17 similar concerns across multiple cases but it would
18 appear that cases were, in fact, dealt with in local
19 offices without any real understanding of similar cases
20 existing elsewhere, again, David Teale, same reference,
21 at page 8.

22 Had all such cases been dealt with by a single team,
23 had there been some recognition of parallels between
24 individual cases, then it may have been that issues
25 could have been highlighted at an earlier stage but that

1 I have available, sir, will be instead on matters
2 specific to Ms Sinclair's experience and to those of
3 Scottish subpostmasters in general, and I propose to
4 address four questions:

5 Firstly, did the involvement of COPFS, the
6 independent public prosecutor, afford greater protection
7 to those facing allegations and, if not, why not?

8 Secondly, did POL understand its duties as
9 a Specialist Reporting Agency; did it discharge them,
10 particularly in relation to revelation?

11 Thirdly, did COPFS comply with its duty of
12 continuing disclosure?

13 Fourthly, to what extent did the corroboration
14 requirement, that we have in Scottish Criminal Law, act
15 as a safeguard against wrongful conviction?

16 So if I may turn to the first to the first of those
17 questions: did the involvement of COPFS afford greater
18 protection to those facing allegations?

19 As the Inquiry will be aware, in Scotland
20 prosecutions are generally the responsibility of the
21 Crown, COPFS. Private prosecutions are vanishingly
22 uncommon. POL has never had any power to prosecute in
23 the Scottish courts, and it is instead a Specialist
24 Reporting Agency, taking on a role broadly analogous to
25 that of the police.

1 did not happen.

2 The second question I posed: did POL understand its
3 duties as a Specialist Reporting Agency and did it
4 discharge them?

5 COPFS publishes on its website a list of Specialist
6 Reporting Agencies. There are well over 100, including
7 bodies such as HMRC, local authorities, health boards
8 and other public bodies. POL appears to be the only one
9 which is a commercial enterprise. It's also unusual in
10 that it had a financial interest in the cases it
11 reported, and I invite the Inquiry to consider the
12 appropriateness of that when reaching conclusions about
13 the conduct of POL generally.

14 COPFS has produced various documents relating to the
15 standards expected from Specialist Reporting Agencies.
16 The evidence before the Inquiry has not yet established
17 the extent to which those standards were understood by
18 POL, far less applied.

19 It's worth noting, though, the position regarding
20 obligations of revelation and disclosure in Scottish
21 criminal law. Prior to the commencement of the Criminal
22 Justice and Licensing Scotland Act 2010, disclosure in
23 criminal proceedings was governed by the common law.
24 The legislation that now applies in Sections 117 and
25 119, referring to summary and solemn cases respectively,

1 now provides that, as soon as practicable, after first
2 appearance in court, the investigating agency, in this
3 case POL, must provide the prosecutor with details of
4 all the information that may be relevant to the case for
5 or against the accused that the agency is aware of, that
6 was obtained, whether by the agency or otherwise, in the
7 course of investigating the matter.

8 That duty of revelation plainly encompasses
9 information which would be relevant to an assessment of
10 the reliability of a computer system such as Horizon.
11 Yet it is plain that no such information was provided to
12 COPFS, certainly not at the outset. The first
13 indications of concern came, it would appear, in 2013.
14 At that time, POL instructed external solicitors in
15 Scotland for the first time and sought to research COPFS
16 about ongoing cases. It was only in October 2015 that
17 POL finally intimated to COPFS that Horizon prosecutions
18 were no longer considered to be sustainable.

19 I refer to the statement of Kenneth Donnelly, the
20 Deputy Crown Agent, a very senior position in Crown
21 Office, which is WITN10510100 at paragraphs 43 to 53.

22 I then ask: did COPFS comply with its duty of
23 continuing disclosure?

24 Now, plainly, COPFS could not disclose to the
25 defence information that it was unaware of. POL's

1 consider is: to what extent did the corroboration
2 requirement act as a safeguard against wrongful
3 conviction?

4 In the Scottish system, nobody can be convicted of
5 a crime based on a single source of evidence alone.
6 Where there is a strong primary source of evidence,
7 however, all that is required is something that provides
8 an independent check, evidence that is at least capable
9 of supporting that primary source.

10 Corroboration is often presented as a significant
11 safeguard for accused people and yet here it appeared
12 that the assumption that evidence from a computer system
13 was inherently reliable meant that very little was then
14 thought to be required to corroborate it and, in
15 particular, to corroborate the fact that a crime had
16 been committed, that money had disappeared.

17 In the case of William Quarm, which the Inquiry
18 considered, corroboration apparently came from
19 admissions that he made when confronted by
20 Investigators, David Teale's evidence, INQ00001120 at
21 page 16.

22 In the case of my client, Ms Sinclair, the court
23 relied on, essentially, her unwillingness to accept that
24 any money had gone missing, her failure to make a report
25 to the authorities, and so forth, and we see that from

1 revelation of the Horizon problems came 10 years too
2 late, so far as Ms Sinclair's prosecution was concerned.
3 But COPFS's duty did not end at the point of conviction.
4 Section 137 of the 2010 Act provides that:

5 "Where the prosecutor becomes aware of relevant
6 information after conviction, that information must be
7 disclosed to the convicted person as soon as
8 practicable."

9 This duty was acknowledged by Mr Donnelly at
10 paragraphs 7 to 12 of this witness statement, and by
11 David Teale in his oral evidence, that's INQ00001120 at
12 page 6, but wasn't further addressed.

13 COPFS appears to accept that it knew of concerns
14 about the reliability of Horizon in 2013, yet no attempt
15 appears to have been made to consider the implications
16 for convicted persons, such as Mrs Sinclair, and the
17 Crown's duties under Section 137. In his evidence,
18 David Teale said that he was not asked to report back on
19 any live cases to the Crown's Head Office. That's at
20 page 10 of the same reference given.

21 As it was, it took a further ten years from that
22 point of 2013, and the involvement and the sterling work
23 of the SCCRC before any Scottish convictions were
24 finally overturned.

25 The final question I would invite the Inquiry to

1 the report from the trial judge, which is at
2 COPF0000052, page 12.

3 It would appear that the existence of what might be
4 termed "technical corroboration" was seen as being good
5 enough in the face of this inherent acceptance of the
6 reliability of a computer system and that, as a result,
7 there was no need for COPFS to look any further.

8 So in conclusion, these are my submission matters
9 which are critical for those affected in Scotland, but
10 they have a wider impact: those who think, for instance,
11 that the mere removal of POL's power to prosecute in
12 England and Wales would have prevented this scandal need
13 any look at our experience north of the border to see
14 the fallacy in that belief.

15 To learn lessons for the future, we have to properly
16 understand what happened in the past. Evidence on the
17 issues which I have raised has been limited, I have to
18 recognise, and I would invite the Inquiry to consider
19 a closer examination of at least some of these issues in
20 the phases which follow.

21 I'm obliged.

22 **SIR WYN WILLIAMS:** And I'm obliged to you, Mr Munro, for
23 reminding me of some very important features which have
24 emerged as a consequence of looking at Scotland as well
25 as England and Wales.

1 So, I think, Mr Beer, that concludes those who wish
2 to make oral submissions; is that correct?

3 **MR BEER:** It is correct, sir, yes.

4 **SIR WYN WILLIAMS:** Well, all that is going to happen now,
5 then, is that I propose to make a short statement, and
6 then adjourn the Inquiry.

7 **MR BEER:** Sir, thank you, yes.

8 **SIR WYN WILLIAMS:** So unless you have any business, Mr Beer,
9 I will make my statement and adjourn the Inquiry.

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

11 **Closing statement from SIR WYN WILLIAMS**

12 **SIR WYN WILLIAMS:** Phases 1 to 4 of the Inquiry are now
13 substantially complete. I use the word "substantially"
14 quite deliberately. Oral evidence from a small number
15 of witnesses, including Mr Gareth Jenkins, is yet to be
16 heard and there remains a possibility that the
17 continuing disclosure of documents to the Inquiry will
18 reveal issues related to Phases 2, 3 and 4 which will
19 require the Inquiry to make public additional documents
20 or even adduce further oral evidence.

21 Now, however, it is time to look forward and for me
22 to lay out how and when I propose to deal with the
23 remaining phases of the Inquiry.

24 For some time now, I have been considering the
25 possibility that Phases 5 and 6 should be run together

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1 the coming weeks.

2 Phases 5 and 6 will begin on Tuesday, 9 April 2024
3 and I intend that they will end by Wednesday, 31 July
4 2024. There will be a break of one week during the week
5 of Monday, 27 May. Save during that break, the Inquiry
6 will sit four days per week as has been its practice to
7 date. A written timetable will be published on the
8 Inquiry website in due course.

9 Following consultation with my teams, I considered
10 whether it would be possible to start Phases 5 and 6
11 earlier than 9 April 2024. I have concluded that this
12 is not possible for the following principal reasons:

13 First, it is my current intention to adduce oral
14 evidence from at least 68 witnesses in these phases.
15 A great deal of preparatory work is and will be
16 necessary if that number of witnesses is to be
17 accommodated between 9 April and 31 July. A list of
18 those 68 witnesses will be provided when this statement
19 is published, as it will be later today.

20 Second, if Phases 5 and 6 were to be heard
21 separately, there would need to be breaks before Phase 5
22 began and then before the start of Phase 6. Those
23 breaks, together with the periods necessary for oral
24 hearings, would probably mean that Phases 5 and 6 would
25 not be completed by 31 July, thereby prolonging the life

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1 as one phase. Having consulted with my legal and
2 Secretariat teams, I have decided that this is the way
3 forward. Those phases are concerned with so many issues
4 which overlap, that to consider them separately would be
5 artificial and probably excessively time consuming.

6 There is, however, one topic within Phase 5 which
7 I do not consider can be appraised finally for some time
8 yet. That is the topic of the three compensation
9 schemes currently in being. I must reach conclusions
10 about whether these schemes are operating and/or have
11 operated fairly, and whether they have fulfilled their
12 stated aim of providing full and fair compensation
13 promptly to all those who are eligible to receive it.

14 I have decided that, to do justice to this topic, it
15 will be heard as part of Phase 7. This will allow me to
16 look at as full a picture as possible relating to
17 compensation issues before I report to the Minister.

18 However, I am conscious that this topic attracts
19 widespread attention for obvious and justified reasons.
20 It is now virtually six months since I delivered
21 an interim report relating to compensation issues to the
22 Minister. I am alive to the possibility that it may be
23 necessary to hold a further, discrete compensation
24 hearing before the beginning of Phase 7.

25 I will keep that under review during the course of

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1 of this Inquiry.

2 Accordingly, the break before the start of Phases 5
3 and 6 will help to assist the process of completing the
4 evidence gathering as quickly as is reasonably
5 practicable.

6 Third, a substantial break now will maximise the
7 chance that Post Office, UKGI and any other document
8 providers, with whom the Inquiry has expressed concern,
9 will be able to comply with their disclosure obligations
10 in a timely way.

11 Fourth, I have now heard a great deal of evidence
12 and I have heard a number of submissions on that
13 evidence from representatives of Core Participants.
14 I am satisfied that having the opportunity to take stock
15 at this stage and perhaps formulate some preliminary
16 views will minimise the time I will need to spend
17 writing my report following the completion of evidence
18 gathering.

19 Assuming that Phases 5 and 6 are complete by 31 July
20 2024, Phase 7 will commence on Tuesday, 3 September
21 2024. My current estimate is that this phase will be
22 completed by the end of September 2024 but I make it
23 clear that this is a provisional view.

24 Finally, my report will follow as soon as is
25 reasonably practicable, following the completion of the

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1 evidence gathering. As I have said, that statement will
2 be published later this afternoon with a list of the
3 68 persons who will be called to give evidence in
4 Phases 5 and 6.

5 Experience over very many years has taught me that
6 when judges or Chairs of inquiries try to make jokes, it
7 usually falls very flat. I will, however, end this
8 session by sharing with you my wry amusement at the
9 efforts of my English brethren and sisters to pronounce
10 the name of Mr Hughie Thomas' branch in Anglesey.
11 Various permutations have been tried. As a South
12 Walian, I would call it Gaerwen.

13 Thank you all very much and I'll see you in April,
14 if not before.

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

16 **(1.23 pm)**

17 **(The hearing adjourned until 10.00 am on 9 April 2024)**

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