

Tuesday, 9 April 2024

1

2 (10.00 am)

3 **SIR WYN WILLIAMS:** Mr Beer, can I explain that one of our
4 assessors is joining remotely this morning and
5 I understand that, before we begin hearing evidence, you
6 wish to raise the issue of disclosure.

7 **Statement by MR BEER**

8 **MR BEER:** Yes. It's a matter of importance that I wanted to
9 update you and the Core Participants on, before we
10 called Mr Bates to give his oral evidence and commence
11 the substance of the hearings in Phases 5 and 6. The
12 Core Participants were sent an email via the solicitor
13 to the Inquiry yesterday that contained relevant
14 correspondence from the Post Office, that dates between
15 28 March and 5 April, sent to the Inquiry, that consists
16 of nine letters.

17 I would propose to give you a brief background
18 before moving to the current issue. I am going to try
19 and keep it as succinct as possible but I also think
20 that putting the current issue in context may assist
21 you.

22 Sir, you will recall that the Post Office's late and
23 problematic disclosure of documents has been a constant
24 theme in this Inquiry, resulting in you ordering that we
25 hear oral evidence from the Post Office and its Inquiry

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1 at short notice, including, you will remember,
2 Mr Jenkins and Mr Longman, both of whom the Inquiry has
3 now scheduled to hear during Phases 5 and 6.

4 Whilst other matters were discussed at the hearing
5 held on 12 January, the focus was on the Post Office's
6 work related to the Microsoft Exchange repository.

7 On 31 January this year and following the hearing,
8 you made directions which were published on the Inquiry
9 website. Those directions provided that, firstly,
10 a meeting would be held between the representatives of
11 the Inquiry and the Post Office to discuss disclosure
12 issues as soon as reasonably practicable and, in any
13 event, well before the commencement of oral hearings in
14 Phases 5 and 6. You directed that the meeting would be
15 minuted and that the minutes should be agreed and
16 thereafter disclosed to Core Participants.

17 Secondly, you ordered that a further disclosure
18 hearing should be convened either before or during
19 Phases 5 and 6 of the Inquiry.

20 On 28 February 2024 members of the Inquiry Team and
21 Information Management Team met with the Post Office and
22 its representatives in this building, as directed by
23 you, and the Inquiry later circulated a copy of the
24 minute of that meeting, as agreed with the Post Office,
25 to Core Participants.

3

1 representatives in two disclosure related hearings held
2 in July and September last year. On 12 January this
3 year, the Inquiry held a further hearing on disclosure,
4 and called Post Office's recognised legal
5 representative, Mr Jackson of Burges Salmon LLP, to give
6 oral evidence.

7 You will recall that, by and large, the key issue
8 that was discussed at that hearing was how the Post
9 Office had discovered a further Post Office repository
10 or data source known as Microsoft Exchange/365.

11 You will recall that the Microsoft Exchange/365
12 repository was brought to the Inquiry's attention during
13 the Phase 4 hearings and, as a result, the Inquiry
14 received numerous, sometimes voluminous, last-minute
15 disclosure of documents said to relate to Phase 4
16 witnesses, on some occasions only days before some
17 witnesses were to you to give their evidence.

18 During the January hearing, Mr Jackson said that
19 such last-minute disclosure by the Post Office during
20 the Phase 4 hearings had been "suboptimal". Those late
21 disclosures had put immense pressure on the Inquiry
22 counsel and solicitor teams who worked extremely hard to
23 ensure that the Phase 4 hearings could, in fact,
24 continue as planned. In some instances, regrettably,
25 a decision was made to postpone or reschedule a witness

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1 I will not read the minute in full but I note that
2 paragraph 3 of the minute, as circulated, says as
3 follows:

4 "At the outset of the meeting, leading Counsel to
5 the Inquiry [that's me] noted that, from the Inquiry's
6 perspective, the aim of the meeting was to ensure that
7 the Post Office are doing as much as possible to ensure
8 Phases 5 and 6 can proceed in accordance with the
9 Inquiry timetable.

10 "Mr Jackson confirmed that the Post Office agreed
11 and noted that the Post Office's starting point for the
12 meeting was prioritising and clarifying what needed to
13 be done in line with your directions, ensuring
14 reasonable and proportionate disclosure whilst
15 minimising and hopefully avoiding disruption to the
16 hearing timetable and the Inquiry's proceedings.

17 "Counsel to the Inquiry confirmed that the aim was
18 not minimising disruption to the hearings but
19 eliminating it, given the Post Office's highly
20 disruptive late disclosure in Phase 4.

21 "Mr Jackson confirmed that the Post Office also
22 aspired to eliminate disruption wherever it was possible
23 to do so and that the Post Office's recent structural
24 work should have mitigated the likelihood that a new
25 disclosure issue would come from left field.

4

1 "In order to achieve that objective, prior to the
2 meeting, the Inquiry had provided the Post Office with
3 a series of deadlines for any further late disclosure of
4 Microsoft Exchange documents in correspondence."

5 In summary:

6 "For all oral witnesses but for those listed in the
7 for your weeks of the Inquiry timetable, the Inquiry
8 directed that any late disclosure must be provided by
9 the Post Office no later than six weeks before the date
10 on which the witness is due to be called to give
11 evidence. For the witnesses listed in the first four
12 weeks, separate specific deadlines had been set in
13 March 2024."

14 The Inquiry and the Post Office also discussed
15 other, what the Inquiry understood to be, relatively
16 *ad hoc* and less significant potential document sources,
17 ie other than Microsoft Exchange. This was outlined in
18 the meeting minute at paragraph 10:

19 "Mr Jackson then took the Inquiry Legal Team through
20 the work completed by the Post Office regarding other
21 potential document sources, including Mimecast, SMS, and
22 instant messaging, and e-media sources (corporate
23 devices, servers, back-up tapes and file stores). Post
24 Office's representatives confirmed that they had sent
25 and were still sending questionnaires regarding data

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1 commencement of Phases 5 and 6 today. You considered
2 our advice and confirmed you agreed with it but, in the
3 light of the historic disclosure issues and the
4 disruptive nature of the Post Office's late disclosure
5 of Microsoft Exchange material in Phase 4, you noted
6 that you wanted to keep this issue under very close
7 consideration. You also noted that you would not
8 hesitate to hold a hearing should it become necessary in
9 due course.

10 Throughout February and March, the Post Office
11 continued to disclose a large volume of material, as
12 a result of its Microsoft Exchange disclosure failings
13 and the remediation exercises put in place to rectify
14 them. The last of these productions was made on
15 22 March 2024.

16 Can I turn to the present issue then.

17 On Thursday, 28 March the legal representatives for
18 the Post Office notified the Inquiry that the Post
19 Office would be providing the Inquiry with documents
20 that day and the following week, in relation to
21 witnesses giving evidence during the first week of
22 Phases 5 and 6 of the hearings and in the latter part of
23 April or documents which might otherwise be "of interest
24 to the Inquiry".

25 The volume of documents was said to be in the low

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1 sources to specific former Post Office employees and
2 board members. Material held by third-party advisers
3 and material relating to whistleblowing was also
4 discussed.

5 "In short, the Inquiry understood that work was
6 still ongoing in relation to some of the additional data
7 sources but should Post Office have any material update
8 and, in particular, should any particular data source
9 contain highly relevant material, Post Office would
10 alert the Inquiry as soon as possible."

11 On distributing the minute to Core Participants, the
12 Inquiry noted that, as the disclosure process by the
13 Post Office was continuing and the disclosure of
14 additional documents to the Inquiry had only recently
15 started, I had advised you that the Inquiry Legal Team
16 ought to continue to monitor the Post Office's
17 compliance with the Inquiry disclosure requirements and
18 report to you at regular intervals.

19 The reporting ought to include whether the Post
20 Office continued to meet the deadlines the Inquiry had
21 set in order to enable the Phase 5 and 6 oral hearings
22 to proceed and thereafter continued as scheduled.

23 At that stage, I and the solicitor to the Inquiry
24 advised that we considered it premature for the Inquiry
25 to hold a further disclosure hearing prior to the

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1 hundreds and no more than 1,000 and to have come from
2 "a last check scoping exercise", particularly in
3 relation to documents from third-party advisers. Some
4 such documents were in response to the Inquiry's
5 Section 21 notice, issued as long ago as 21 July 2023,
6 known as section 21(3). Others were not responsive to
7 a notice or a request from the Inquiry but were
8 otherwise of interest.

9 As I say, section 21(3) was sent by the Inquiry to
10 the Post Office back on 21 July last year, in which the
11 Inquiry mandated that the Post Office disclose several
12 categories of material relevant to Phases 5 and 6 of the
13 Inquiry, ie documents addressing what was defined in the
14 notice as "relevant issues". The relevant issues
15 including reviews of Horizon carried out by Ernst &
16 Young, Deloitte, KPMG and Linklaters. The notice
17 expressly stated that the documents be those created by,
18 sent to or received by, recorded a conversation or
19 meeting involving, or otherwise made reference to 19
20 specific individuals within the Post Office.

21 The individuals named in the notice included but
22 were not limited to: Paula Vennells, Alice Perkins,
23 Alwen Lyons, Angela van den Bogerd, Mark Davies, Tim
24 Parker and Susan Crichton.

25 At 5.32 on Thursday, 28 March, the Post Office sent

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1 a covering letter for a production of 1,071 documents.
2 The cover letter noticed that the Post Office had
3 "initiated two assurance exercises", the first being
4 a review of specific third-party adviser material, and
5 the second being search and review of email inboxes of
6 personal assistants (PAs) to the Section 21(3)
7 individuals, and other email inboxes of potential
8 relevance where considered appropriate for this
9 exercise.

10 The letter further explained that the Post Office's
11 Section 21(3) search methodology focused on the relevant
12 individuals' data sources, third-party adviser files and
13 personal assistant emails have previously been reviewed
14 or other Rule 9s and Section 21s, as explained in
15 previous interim disclosure statements. However, as
16 part of assurance, Post Office has now run such searches
17 across specific third-party adviser files, as was set
18 out in the letter.

19 So such third-party advisors included those who the
20 Inquiry had specifically named in the Section 21 notice,
21 including Linklaters, Deloitte and KPMG.

22 The Post Office explained that, within the
23 production of 1,071 documents, 788 of them were said to
24 be relevant to Section 21(3), of which 583 related to
25 witnesses and 15 documents were said to be "of high

1 a four-page letter seeking:
2 "... to provide a brief update regarding the Post
3 Office's further urgent witness-focused review to best
4 assist the Inquiry with anticipated time meetings for
5 further productions."

6 That letter has been provided to cops and I'm not
7 going to repeat it.

8 However, it was in this letter, received after hours
9 on Tuesday, that the Inquiry was informed that the Post
10 Office intended to make "a small number of further
11 Burges Salmon/Field Fisher productions in the near
12 future of further documents relevant to Phases 5 and 6".
13 It was said that most will be directly relevant to
14 witnesses scheduled to appear later in April and then in
15 May to July, but a limited amount will relate to
16 witnesses scheduled to appear during this week,
17 ie starting today.

18 The letter said that the Post Office anticipated
19 that the documents that relate to witnesses appearing
20 this week are likely to be low in number and/or not
21 likely to contain many documents that will give rise to
22 potential questions for those witnesses but will rather,
23 particularly for non-Post Office or Royal Mail Group
24 witnesses, for the most part be documents that refer to
25 them.

1 relevance and material".
2 44 documents were said to be documents of interest,
3 being documents that the Post Office said were not
4 directly responsive to the notice but were otherwise of
5 relevance to the Inquiry's terms of reference. Of
6 those, six related to witnesses; the remaining 239
7 documents were family members of such documents.

8 The Post Office noted that a number of the documents
9 could be apparent duplicates of previous documents
10 already produced but that information to assist in
11 identifying duplicates would be provided separately.

12 Sir, the Easter break then took place between
13 Friday, 29 March and Monday, 1 April. At around
14 10.00 am on 2 April, the Post Office's legal
15 representative contacted the Inquiry legal team to note
16 that further documents were to be expected. The Post
17 Office requested a meeting with the Inquiry to provide
18 an update and discuss how the Post Office intended to
19 disclose further documents.

20 At 11.47 on 2 April, the Inquiry confirmed it would
21 be grateful if the Post Office could please provide the
22 Inquiry with the information it should have, or would be
23 assisted in having, in relation to the late disclosure
24 that was relevant to hearings or witnesses this week.

25 At 6.58 pm that day, the Post Office sent the Inquiry

1 Importantly, the letter said that the Post Office
2 anticipated making yet further productions of material
3 following five further reviews. It confirmed that the
4 reviews were not related to the Microsoft Exchange
5 remediation process but, as noted already, the documents
6 were relevant to Phases 5 and 6 and to witnesses
7 scheduled to be called as early as this week.

8 Those five reviews were summarised by the Post
9 Office as follows: first, the third party adviser and
10 personal assistant review; secondly, the NAS drive and
11 FileShare review; thirdly, the supplementary
12 precautionary Mimecast review, arising from the Phase 5
13 and 6 remediation review; the hard copy documents
14 review; and, finally, the Patrick Bourke 2017 Mimecast
15 data review.

16 The Post Office did not provide the numbers of
17 documents for witnesses commencing this week, although
18 they anticipated providing those numbers shortly.

19 Between 2 April and 5 April, the Inquiry received
20 seven further letters about one or more of those
21 reviews. Those letters have also been provided to Core
22 Participants and I shouldn't repeat them.

23 Within those letters, the Post Office disclosed
24 a number of additional documents as follows:

25 On 3 April, 196 documents were disclosed, said to be

1 from the NAS drive. The Post Office said they were
 2 continuing to collect material from the Post Office
 3 FileShare that might be relevant to the Phase 5 and 6
 4 hearings. However, the Inquiry understands such
 5 a measure to be out of an abundance of caution.

6 Also on 3 April, 3,188 documents were disclosed,
 7 said to be from:

8 "... further material identified from third-party
 9 adviser files and material identified as part of
 10 a second assurance review, involving searches of email
 11 inboxes of personal assistants to Section 21(3)
 12 individuals and other inboxes of potential relevance
 13 where considered appropriate."

14 This was further to the 1,071 documents already
 15 disclosed to the Inquiry back on 28 March.

16 On Friday, 5 April, so the Friday that's just
 17 passed, the Post Office disclosed 189 documents
 18 following a review of Post Office's hard-copy material,
 19 200 documents following an additional precautionary
 20 Mimecast review, a further 374 documents were disclosed
 21 said to be the third tranche of documents, including
 22 "further material identified as part of a second
 23 assurance review involving searches of email inboxes of
 24 personal assistants to Section 21(3) individuals". This
 25 was in addition to the 1,071 documents disclosed on

1 to be ongoing. We understand the data is being selected
 2 and processed urgently. The volume and timing of such
 3 disclosure is unknown but the Post Office said they were
 4 working to disclose any further documents well in
 5 advance of Patrick Bourke's hearing on 7 May.

6 Sir, we in the Inquiry Team wish to inform you and
 7 the Core Participants of these developments without
 8 delay. They present issues with which the Inquiry has
 9 become extremely and unfortunately familiar with over
 10 the past three years.

11 I should also put the developments in a wider
 12 context. Since the end of the Phase 4 hearings alone,
 13 so that's since the closing submissions on 2 February
 14 2024, the Post Office has disclosed 73,720 documents to
 15 the Inquiry, of which the Inquiry Legal Team have
 16 characterised 67,210 documents as possibly relating to
 17 Phases 5 and 6 of the Inquiry.

18 The Inquiry has received documents from other
 19 providers during that time, albeit none as substantial
 20 in volume as the Post Office, and the Inquiry's
 21 information management team have confirmed that, as of
 22 late yesterday, at least 78,211 documents, including but
 23 not limited to the Post Office's documents, that likely
 24 or potentially relate to Phases 5 and 6 of the Inquiry
 25 may fall for disclosure to Core Participants.

1 28 March and the 3,188 documents disclosed two days
 2 further.

3 The Post Office said that it was now "urgently
 4 reviewing data for personal assistants to the
 5 Section 21(3) individuals who are witnesses and are due
 6 to give evidence from 23 April onwards", and they
 7 anticipated they would provide the documents to the
 8 Inquiry on or before this Friday, 12 April.

9 Sir, taking the five reviews, about which the
 10 Inquiry was informed on 2 April in turn, I understand
 11 the position to be as follows: the third-party adviser
 12 and personal assistant review has seen the disclosure of
 13 a total of 4,633 documents since 28 March alone, the
 14 Post Office has told us that review is not yet complete.

15 The NAS drive and FileShare saw the disclosure of
 16 196 documents from the NAS drive last week but the
 17 review is ongoing in relation to other witnesses.

18 The supplementary precautionary Mimecast review
 19 arising from the Phase 5/6 remediation review saw the
 20 disclosure of 200 documents but that's now said to be
 21 complete.

22 The hard copy documents review saw the disclosure of
 23 189 documents last week, it's unclear if that review is
 24 complete or remains ongoing.

25 The Patrick Bourke 2,017 Mimecast data work appears

1 The matters that the Inquiry is investigating span
 2 two decades and a number of detailed issues. In order
 3 to proceed with hearings in a meaningful way, the
 4 Inquiry has needed to prioritise its disclosure to Core
 5 Participants and will continue to do so.

6 It's with this in mind that we in the Inquiry Team
 7 specifically set deadlines for the receipt of the late
 8 exchange material likely to be relevant to the Phase 5
 9 and 6 hearings on a witness-by-witness and week-by-week
 10 basis, in order to ensure that the hearings could go
 11 ahead as planned.

12 This was communicated to the Post Office and the
 13 Inquiry understood that the Post Office considered that
 14 it had completed its Phase 5/6 exchange remediation
 15 exercises by 22 March.

16 The obligation of disclosure to the Inquiry is, of
 17 course, ongoing. The Inquiry had expected and indeed
 18 anticipated ongoing disclosure from providers of
 19 documents in certain instances -- documents can be found
 20 late, hard copies or electronic files or messages may
 21 turn up in unexpected devices -- but the issues that the
 22 Post Office's disclosure to this Inquiry have presented
 23 have been much more than minor, *ad hoc* or additional
 24 disclosure.

25 In particular, the Post Office's assurance review,

1 as it has called it, of personal assistant emails and
 2 other inboxes of potential relevance in response to the
 3 Inquiry's Section 21(3) notice of last year is very
 4 concerning. As I say, that notice was sent in July of
 5 last year. It lists a number of senior key Post Office
 6 individuals. Such individuals would undoubtedly
 7 communicate via their personal assistants. The inboxes
 8 of what are called "inboxes of potential relevance" have
 9 not been explained by the Post Office so we don't know
 10 to whom they relate.

11 Even more concerning, the Inquiry emphasised that
 12 the Post Office ought to apply a common-sense approach
 13 to senior custodians, as far back as a meeting with the
 14 Post Office in April 2023.

15 Sir, you asked for your team closely to monitor the
 16 Post Office's disclosure to the Inquiry, we have done so
 17 and so will continue to do so. Whilst these new
 18 developments are, to use a Parliamentary word,
 19 unwelcome, your team is not unprepared. We are
 20 committed to doing all that we can to ensure that the
 21 hearings can go ahead as planned and, subject to your
 22 views, that's what we intend to do: to continue with the
 23 hearings. The alternative -- further delay to allow the
 24 Post Office to get its disclosure house in order -- is
 25 not one which is acceptable.

17

1 the witness, by re-calling them if necessary.

2 The alternative is to have a substantial break and,
 3 in my opinion -- dare I say judgment, even though I'm
 4 not a judge anymore -- that is not desirable.

5 Make no mistake, everyone, I understand fully that
 6 the problems with disclosure are capable of creating
 7 very significant pressures for all participants in the
 8 Inquiry but protracted adjournment, so as to ensure that
 9 every relevant disclosable document is in the hands of
 10 all Core Participants prior to a witness giving evidence
 11 would also cause very damaging stresses to all the
 12 participants, and so I have to exercise judgement and
 13 come to a balanced decision.

14 As I've said, my view is that, at the moment, the
 15 problems are not such that we need to call a halt and my
 16 intention is to continue with the evidence sessions in
 17 accordance with our published timetable, so far as is
 18 reasonably possible. I stress, as Mr Beer has stressed,
 19 that the monitoring of disclosure, which I promised
 20 would continue throughout, will continue throughout and,
 21 if I deem it appropriate, I will certainly use one of
 22 our days off, a Monday or sometimes a Friday, to hold
 23 a disclosure hearing. So there's a threat to you all.

24 I want to publicly acknowledge -- and this is the
 25 last of the observations which I wish to make -- that,

19

1 It, of course, follows from that approach that there
 2 may be a need to re-call some witnesses to ask them
 3 questions about documents which have not been processed
 4 in time for them to be asked questions about such
 5 documents in the coming weeks. Sir, that's the approach
 6 we intend to take and that's all I say at the moment
 7 about this latest late Post Office disclosure.

8 **SIR WYN WILLIAMS:** Thank you, Mr Beer.

9 The substance or a summary of what Mr Beer has just
 10 explained publicly was provided to me late last week,
 11 together with Mr Beer and his team's advice that,
 12 despite the problems which have occurred, we should
 13 carry on.

14 I have had the weekend to think about that and also
 15 whether it would be necessary to invite Core
 16 Participants to provide their views to me about that.
 17 The decision I have reached is as follows: first of all,
 18 I don't wish to hear from the Core Participants and,
 19 secondly, we're going to carry on.

20 Now, that is perhaps a bold thing to do because it
 21 does mean that there may be occasions in which witnesses
 22 are giving evidence where the documents haven't caught
 23 up with the witnesses, so to speak, and that is a highly
 24 undesirable state of affairs but, as Mr Beer has
 25 explained, that can be cured, albeit with some cost to

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1 at least in part, I may be to blame for some of the
 2 problems relating to disclosure. There may be some in
 3 this room -- in fact there are some in this room and,
 4 certainly, there are some in the Inquiry Team -- who
 5 consider that the timetables which I set for the hearing
 6 of evidence are unrealistically tight.

7 On any view, the volume of material to be disclosed
 8 to the Inquiry and then by the Inquiry to Core
 9 Participants is enormous. I acknowledge that, if the
 10 hearing phases had been spread out with greater breaks
 11 between them, as some have advocated, then some of the
 12 disclosure pressures would be eased. However, I am
 13 acutely conscious that this Public Inquiry has been in
 14 existence for very nearly three years. Although by the
 15 standards of some inquiries, that is a comparatively
 16 short period of time, I am unshakable in my belief that
 17 this Inquiry should not last for a day longer than is
 18 strictly necessary and, if that means that the pace at
 19 which we proceed causes significant work pressures for
 20 us all, then I'm afraid that's a price we're all going
 21 to have to pay.

22 So thank you for your words, Mr Beer, and I think
 23 we're ready for some evidence.

24 **MR BEER:** Well, just before we do that, can I turn to
 25 a brighter note?

20

1 **SIR WYN WILLIAMS:** All right, a brighter note. Thank you.
 2 **MR BEER:** As you know, sir, and as was publicly announced by
 3 the Inquiry on 9 January this year, the Inquiry jointly
 4 appointed Dame Sandra Dawson and Dr Katy Steward to the
 5 role of governance expert witnesses.
 6 Dame Sandra is Professor Emerita of management
 7 studies, University College Cambridge, and a Fellow,
 8 formerly the Master of Sidney Sussex College Cambridge.
 9 She acted as an expert member on organisation,
 10 governance and leadership on the Expert Advisory Group
 11 on the Windrush Lessons Learned Review and regularly
 12 advises viruses on leadership, governance and
 13 organisation structure.
 14 Dr Steward is a policy governance expert and was
 15 a visiting scholar at Sidney Sussex College Cambridge.
 16 Dame Sandra and Dr Stewart have been instructed to
 17 produce two reports addressing issues relating to
 18 leadership, management and governance. The first of
 19 those reports has been disclosed to Core Participants.
 20 It's dated 27 March 2024 and has the URN EXPG0000006.
 21 It sets out the expected and best practice in relation
 22 to the standards of governance, management and
 23 leadership in companies such as the Post Office in the
 24 period 1999 to 2019. It's a substantial body of work,
 25 being 133 pages in length, including its appendices.

21

1 looking at your witness statement, please.
 2 **A.** Sure.
 3 **Q.** It's the only hard copy document I'm going to be asking
 4 you to refer to. It's got, for the purposes of the
 5 transcript, the URN WITN00050100 and it's up on the
 6 screen. It's 59 pages long, excluding the exhibits
 7 page, and is dated 29 February.
 8 I have picked up a couple of typos. I wonder
 9 whether we could just correct those first. If we look
 10 at page 23, the foot of page 23, at paragraph 75, it
 11 says:
 12 "The CWU were not provided in this period, as
 13 I recall. The NFSP, in the letter ..."
 14 Should that say "from Colin Baker" --
 15 **A.** Yes, it should.
 16 **Q.** -- "dated 13 January"? So cross out the words "January
 17 200" and put in the word "Baker"?
 18 **A.** Yes, please.
 19 **Q.** Page 32, paragraph 102. It says:
 20 "In my letter to Mr O'Neill dated 9 September 2009
 21 ..."
 22 I think that should be 2004.
 23 **A.** The original letter? Yes, it would be. Yes, you're
 24 right.
 25 **Q.** Yes. So if that can be corrected to 2004, thank you.

23

1 A copy of that report, the first report, is to be
 2 treated as being having read into the record today and,
 3 therefore, a copy will be uploaded to the Inquiry's
 4 website today.
 5 Dame Sandra and Dr Steward will be considering the
 6 evidence given in Phases 5 and 6 of the Inquiry, both
 7 the written evidence and the oral evidence and will
 8 produce a second report in the light of that evidence
 9 when Phases 5 and 6 have concluded.
 10 **SIR WYN WILLIAMS:** Thank you, Mr Beer. I think we can all
 11 agree that is a brighter note.
 12 **MR BEER:** Can I call Alan Bates, please.
 13 **SIR WYN WILLIAMS:** Yes, of course. Ah, he has appeared.
 14 **ALAN BATES (sworn)**
 15 **Questioned by MR BEER**
 16 **MR BEER:** Good morning, Mr Bates.
 17 **A.** Good morning.
 18 **Q.** My name is Jason Beer, as you know, and I ask questions
 19 on behalf of the Inquiry. Can you tell us your full
 20 name please?
 21 **A.** Alan Bates.
 22 **Q.** Thank you very much for previously providing
 23 a comprehensive and detailed witness statement to the
 24 Inquiry and for coming to London today to give evidence
 25 to assist the Inquiry in its work. Can we start by

22

1 If you can turn to page 59, please, in the hard
 2 copy, do we see your signature there?
 3 **A.** Yes, you do.
 4 **Q.** With those two typos corrected, are the contents of the
 5 statement true to the best of your knowledge and belief?
 6 **A.** They are.
 7 **Q.** Thank you very much, Mr Bates. I'm not going to ask you
 8 questions about every aspect of your witness statement
 9 because it's long and detailed and a copy of it will be
 10 uploaded to the Inquiry's website today, so the public
 11 can read it.
 12 The statement can come down, please.
 13 Can I start with a little bit about your background.
 14 You tell us in your witness statement, it's paragraph 5,
 15 no need to turn it up, that before you became
 16 a subpostmaster, you worked for 12 years in the heritage
 17 and leisure project management sector; is that right?
 18 **A.** That's correct.
 19 **Q.** Is it right that, in the course of that work, you
 20 developed experience in Electronic Point of Sale (EPOS)
 21 systems?
 22 **A.** Yes, I did.
 23 **Q.** You developed experience in the development of
 24 site-specific business software and the provision of
 25 staff IT training?

24

1 A. That's correct.
 2 Q. To what extent, if any, did that background assist you
 3 when you became a subpostmaster and were later required
 4 to work with the Horizon IT System?
 5 A. I think when Horizon came in, I think I was quite
 6 positive about it because I knew what technology and
 7 these sorts of systems could do, so I was quite
 8 positive. But I found it a bit frustrating, once the
 9 system was installed and we were operating, I found
 10 there were many shortcomings in the system and, knowing
 11 what these systems could do, it just seemed a bit of
 12 a lost opportunity.
 13 Q. You were a subpostmaster, I think, between 31 March 1998
 14 and 5 November 2003 --
 15 A. Yes.
 16 Q. -- by my reckoning, so a period of five and a half years
 17 or so?
 18 A. That's correct.
 19 Q. By comparison, if you don't mind me saying, to other
 20 subpostmasters, that's a relatively short period, isn't
 21 it?
 22 A. It is. Sorry, it is but it's due to Post Office, not to
 23 myself.
 24 Q. Quite. Also, I suppose, ironically, you spent more than
 25 four times that period campaigning?

25

1 injustice that had been descended upon them, it was
 2 something that you felt you had to deal with. It's
 3 something you felt you had to deal with. It's something
 4 you couldn't put down and you had the support of the
 5 rest of the group in there as well. Sorry.
 6 Q. Do take a moment to clear the frog in your throat.
 7 A. Yeah, I have. Hopefully not a Welsh one.
 8 Q. Talking of which, you ran a post office in North Wales?
 9 A. I did.
 10 Q. What was the name of the post office and in which town
 11 was it?
 12 A. It was Craig-y-Don post office in Llandudno.
 13 Q. Say that again?
 14 A. Craig-y-Don post office in Llandudno.
 15 Q. What kind of Post Office -- what kind of post office was
 16 it?
 17 A. It was a three-position counter in that it was -- when
 18 we first bought the property, it was very much at the
 19 back of the property in there and it was a bit run down,
 20 and it also had another side, a retail side to the
 21 business which was a whole variety of things: crafts,
 22 knitting, haberdashery, a whole range of things. So,
 23 for the first year or two, we just ran the business as
 24 it was and slowly developed it from there, putting on
 25 a big extension, updating the -- updating a lot of the

27

1 A. Oh, yes, yeah.
 2 Q. Why has that been necessary?
 3 A. Because -- well, initially it was because Post Office
 4 terminated my contract, giving me three months' notice
 5 and not giving me a reason for doing so. Purely
 6 because, in my belief, is that it was -- I kept raising
 7 problems and concerns over its Horizon system, due to
 8 a number of faults I'd found over the years.
 9 Q. You tell us in your statement that you spent that period
 10 of time seeking justice, accountability and redress for
 11 not just yourself and your wife but also on behalf of
 12 a much wider group of people; is that right?
 13 A. Yes, I did. Once I'd started my individual little
 14 campaign in there, we found others along the way and,
 15 eventually, we all joined up, and so the JFSA was born
 16 and onwards went the campaign.
 17 Q. You say in your witness statement that you have
 18 "dedicated this part of my life to this cause". Is that
 19 how it has seemed or felt --
 20 A. Well, yeah --
 21 Q. -- firstly, that it has required dedication but,
 22 secondly, that it's a cause?
 23 A. Yes, I think it's also stubbornness as well. But
 24 it's -- I mean, as you got to meet people and realised
 25 it wasn't just yourself, and you saw the harm and

26

1 stock. But, more importantly, we actually saw it as
 2 a big potential to grow the Post Office business and we
 3 brought it right to the front of the building and --
 4 with a large queueing area for people, unfortunately it
 5 seems what post offices need, and so we invested quite
 6 heavily in developing the post office and that was at
 7 the time Horizon came in.
 8 Q. Thank you. I think you and your wife Suzanne were
 9 44 years old when you took it over; is that right?
 10 A. About that, yes, it would have been.
 11 Q. You tell us in your witness statement -- there's no need
 12 to turn it up, it's paragraphs 9 to 13 -- in summary
 13 terms about your decision to become a subpostmaster,
 14 your decision to pick this post office, your hopes and
 15 aspirations and the process by which you applied and by
 16 which your application was approved.
 17 I just want to look at an account you've given in
 18 the past in more detail about that --
 19 A. Sure.
 20 Q. -- if we may. Can we look, please, on the screen at
 21 POL00024194. This is a witness statement you made in
 22 the course of the Group Litigation proceedings in the
 23 High Court, and we'll deal more about that later today;
 24 is that right?
 25 A. Yes, it is, yes.

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1 Q. We can see the date on it in the top right, 9 August
 2 2018. So this witness statement was made for the
 3 purposes of what came to be known as the Common Issues
 4 trial; is that right?
 5 A. That's correct.
 6 Q. So the process by which you applied to become
 7 a subpostmaster, the documents that were or, in fact,
 8 were not given to you, were important issues and
 9 addressed in this witness statement in very great
 10 detail; is that right?
 11 A. That is right, yeah.
 12 Q. Can we look, please, at page 3, and pick up at
 13 paragraph 11, please. You say:
 14 "A key attraction to working with Post Office was
 15 that it would provide secure employment, based upon the
 16 fact it provides a community service and has
 17 an established brand in the community. From among the
 18 various small business options available, a Post Office
 19 branch would, in my mind, be a safe option. I was also
 20 encouraged by the fact I could run a secondary business,
 21 such as a retail shop, alongside the Post Office
 22 branch."
 23 That sets out, in summary, your reasons for picking
 24 Post Office as a future enterprise with your wife; is
 25 that right?

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1 provide Post Office with returns of the position each
 2 week in there as well. But that seemed to be the way it
 3 operated.
 4 Q. But these were small sums of money; is that right?
 5 A. They were small sums of money, yeah.
 6 Q. From paragraph 24 if we scroll down, please, right
 7 through to paragraph 33, at the bottom of page 7, you
 8 deal with the agreement to purchase the Post Office,
 9 yes?
 10 A. Yes.
 11 Q. Then if we go forward to page 8, please, from
 12 paragraph 34 on this page, right through to paragraph 86
 13 on page 19, you deal with the following issues -- I'm
 14 just going to summarise them without reading the text:
 15 firstly the application to the Post Office to be
 16 a subpostmaster; secondly, the interview at the regional
 17 office in Bangor that you and your wife attended;
 18 thirdly, the confirmation that your application had been
 19 successful and the material that you were then given.
 20 Yes?
 21 A. Yeah.
 22 Q. If we just go forward to page 15, please, and look at
 23 paragraph 62, you say:
 24 "... at no stage during the process of my
 25 application, appointment and branch opening ... was

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1 A. That's correct.
 2 Q. Now, paragraph 12 on this page, right through to
 3 paragraph 23 on page 5, addresses the initial enquiries
 4 you made with the existing or the outgoing
 5 subpostmaster -- Peter Savage, I think his name was --
 6 A. That's correct.
 7 Q. -- and the planned visits that you made and, indeed,
 8 some unannounced visits you made to the post office in
 9 question as part of your due diligence; is that right?
 10 A. That's correct.
 11 Q. Can we just look at paragraph 21 on page 5, please.
 12 You say you do remember that:
 13 "... during one of my visits to the Branch Mr Savage
 14 explained that he had a practice of keeping 'unders and
 15 overs' in a tin in the safe as a system to deal with any
 16 odd shorts or overs. I remember this because I thought
 17 it to be rather casual and unusual for a business.
 18 Nevertheless, I was not particularly concerned and
 19 considered it to be a matter for Mr Savage and his staff
 20 and I did not understand it to involve large figures or
 21 to be problematic."
 22 Is that right?
 23 A. That is right and it was very odd and very strange,
 24 I thought, for a cash-based system where you didn't
 25 actually record anywhere the amounts and you didn't

30

1 I ever sent a copy of the [subpostmaster contract].
 2 I first obtained a copy of the [subpostmaster contract]
 3 much later, in the circumstances I explain below ... At
 4 no point during my appointment process was it mentioned
 5 or explained to me that the [subpostmaster contract],
 6 which was a lengthy document of 114 pages, governed the
 7 terms of my appointment."
 8 Now, we will hear later that, is this right, that
 9 the Post Office robustly challenged you on that issue,
 10 alongside other issues, at the trial, and then the trial
 11 judge, then Mr Justice Fraser, held that you were
 12 an honest witness, that you were telling the truth and
 13 that, like many other subpostmasters, you did not
 14 receive a copy of this document?
 15 A. That's correct.
 16 Q. You address later in this section of your witness
 17 statement your initial classroom training and then
 18 lastly, the transfer of the branch to you and the
 19 opening of it, correct?
 20 A. Correct, yes.
 21 Q. Can we turn to the introduction of the Horizon system
 22 into your branch and can we go to your Inquiry witness
 23 statement, please, at page 5. At paragraph 14 you tell
 24 us that:
 25 "In October 2000, [the Post Office] introduced

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1 Horizon at my branch and imposed upon me the requirement
 2 that I use it to record transactions at the branch and
 3 to submit branch accounts. To the best of my
 4 recollection, Horizon was installed from 2 October 2000.
 5 I remember that the branch was closed around this time
 6 to allow for this."

7 So Horizon installed under two years after you took
 8 up the position as subpostmaster of this office?

9 **A.** Correct, yeah.

10 **Q.** Then scroll down to 15, please. You say:

11 "I did not have any involvement in discussions about
 12 the introduction of Horizon, I had no choice but to
 13 accept and accommodate this variation. Obviously, this
 14 was also a huge change in how I operated the branch, as
 15 many of the previous processes that I had been trained
 16 on and had operated at the branch were made obsolete not
 17 only for me, but also for my assistants."

18 Paragraph 16, please. You say:

19 "When Horizon was introduced, given my background
 20 with [Electronic Point of Sale] systems ... I regarded
 21 the introduction of Horizon at first as a positive
 22 innovation."

23 You have told us that in summary this morning.

24 **A.** Yes.

25 **Q.** "However, I did not expect there to be any apparent

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1 control the parameters of your searches for.

2 There were a set of reports, don't get me wrong,
 3 there were a set that were already built into the system
 4 but they were quite restrictive in there, and it did
 5 seem to cause problems.

6 **Q.** We see this as a feature in the correspondence that
 7 we're going to turn to a little later --

8 **A.** Sure.

9 **Q.** -- today and a constant theme that you pursued, ie the
 10 visibility of transactions and the auditability of
 11 transactions from a subpostmaster's perspective was
 12 lacking in the Horizon system; is that correct?

13 **A.** Very much so, yes.

14 **Q.** Can we turn, please, back to your High Court statement,
 15 POL0024194, and turn to page 32, please. Can we pick
 16 it up at paragraph 144. You say that you've been
 17 referred to a part of the Post Office's defence and to
 18 its defence and counterclaim and you say that you
 19 understand from this that the Post Office's case for the
 20 purposes of the Common Issues trial is that "losses do
 21 not arise in the ordinary course of things without fault
 22 or error on the part of the subpostmasters and their
 23 assistants ..." and -- this what the Post Office said:

24 "... 'it would not be right to infer or presume that
 25 a shortfall and loss was caused instead by a bug or

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1 discrepancies shown on the system that I was unable to
 2 identify the cause of and resolve, either by myself or
 3 with support or information from [Post Office Limited].
 4 Certainly, I did not expect discrepancies to occur for
 5 which [the Post Office] would try and hold me liable
 6 without the cause being investigated and established.
 7 To that point, I had been preparing accounts manually,
 8 using the Capture system."

9 Just going back to what you say on the previous
 10 page, you say in the third line:

11 "... I did not expect there to be any apparent
 12 discrepancies shown on the system that [you were] unable
 13 to identify the cause of and resolve ..."

14 What do you mean by that?

15 **A.** Well, I expected to be able to track down any
 16 transaction that I'd undertaken -- myself or my staff
 17 had undertaken at the branch, one way or another. There
 18 were a variety of ways of interrogating systems and the
 19 data on the systems and I presumed that the system would
 20 enable you to do that at the outset but -- I mean, in
 21 previous roles, you know, before Post Office, I'd used
 22 something like Crystal reports on software packages to
 23 extract information, using certain parameters in there.
 24 But there was very little flexibility in Horizon, as
 25 I saw it at that time, for reports that you could

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1 error in Horizon' and that the truth of whether
 2 a shortfall did or did not result from losses for which
 3 the subpostmaster was responsible '... lies peculiarly
 4 within the knowledge of subpostmasters as the person
 5 with the responsible for branch operations and the
 6 conduct of transactions in branches.'"

7 You say:

8 "... these things were in my own experience very far
 9 from the case."

10 Then you set out, from your own experience, by
 11 comparison, what you say, by reference to what the Post
 12 Office suggest. Can we look at paragraph 145, please.
 13 You say:

14 "... I did not expect there to be any apparent
 15 shortfalls that [you were] unable to identify."

16 That's essentially what you said in your Inquiry
 17 witness statement.

18 Then 146, you say:

19 "... one of my fundamental concerns when Horizon was
 20 introduced, which [you] clearly communicated ... through
 21 various letters, was the lack of transparency and
 22 control available to me in reviewing transactions when
 23 trying to balance."

24 You refer to a letter and you say:

25 "I could not fully access data that I needed in

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1 order to properly track and, if necessary, to correct
2 transactions."
3 Your concerns came to a head in December 2000
4 following a particularly difficult balance. You were
5 therefore dependent, you say, upon the Post Office for
6 this sort of information and, therefore, in order to
7 ascertain the cause of any apparent shortfall and
8 whether it was in fact a real loss.
9 Then you say in 147, although Post Office later
10 moved to monthly balancing, during your tenure you were
11 required to produce weekly accounts, which meant you had
12 to conduct a weekly balance on a weekly basis on
13 a Wednesday:
14 "When carrying out this balance on Wednesday,
15 13 December 2000, the Horizon system showed there was
16 an unexplained variance of over £6,000 relating to Giro
17 deposits."
18 That can come down. Thank you.
19 So the first substantial unexplained variance was
20 over £6,000; is that right?
21 **A.** Yes, and it was only a number of weeks after the system
22 had gone live.
23 **Q.** I was going to ask you that: system live about
24 2 October?
25 **A.** Yeah.

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1 things that I'd tried. There --
2 **Q.** Did they suggest anything --
3 **A.** No, and the other impression I got is they couldn't
4 access the system any further than I could at that time.
5 **Q.** Just by way of an aside, I think you tell us in your
6 statement that Post Office records subsequently
7 disclosed to you show that in the two year and nine
8 month period, up until November 2003, ie when your
9 contract was terminated, you and your assistants made
10 507 calls to the helpline --
11 **A.** Correct.
12 **Q.** -- of which 85 related to Horizon and balancing
13 problems?
14 **A.** Yes.
15 **Q.** And that you found the helpline to be ineffective,
16 indeed of no help?
17 **A.** Very much so and often we never bothered ringing it.
18 **Q.** Can we go on to paragraph 149 of your High Court witness
19 statement here. You say using the limited reports you
20 were able to print, you ascertained that around £5,000
21 of the alleged shortfall related to Giro items that had
22 become wrongly duplicated on Horizon:
23 "These reports were in the form of lengthy,
24 multi-line, narrow till receipts and were many metres
25 long making them difficult to review in any event. At

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1 **Q.** We're now talking about 13 December, so two months or so
2 after the system --
3 **A.** Yeah.
4 **Q.** -- had been installed, this variance arose?
5 **A.** Yes.
6 **Q.** If we go back to paragraph 148, please, of POL00024194,
7 so over the page, please, you say:
8 "As you mention [in a paragraph above], I contacted
9 the helpline seeking support and help as to why this
10 apparent variance had occurred. They were unable to
11 assist in any meaningful way. I tried to investigate
12 the matter myself. I printed various reports from two
13 of my three counter terminals. I left the third
14 terminal for use to serve customers as we were very busy
15 in the branch, with customers queueing out of the door."
16 You cross refer back to paragraph 143.1 -- I'm not
17 going to go there -- but, essentially, you tell us in
18 that paragraph that, on that day, 13 December 2000, you
19 contacted the helpline seven times; is that right?
20 **A.** That's correct.
21 **Q.** And one of the calls was about an hour in length?
22 **A.** Yeah.
23 **Q.** Were they of any assistance at all in those seven calls?
24 **A.** Not really. "Stating the bleeding obvious", I think,
25 really, is one description I might use, but it was all

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1 the time, I believed that a majority of the remaining
2 alleged shortfall, being one £1,182.81, was also
3 attributable to Giro errors. However, I was unable to
4 track these potentially smaller sums in the absence of
5 proper reporting functions on Horizon. Therefore, far
6 from being within my knowledge, I was unable to
7 ascertain the root cause of the apparent shortfall at
8 all."
9 You have your thoughts, which you set out later:
10 "I also called my Retail Network Manager, Gerry
11 Hayes, the following day to inform him. In the absence
12 of a proper response from the Post Office, I carried
13 over the apparent shortfall from that week's cash
14 account to the following week's cash account, by
15 transferring it to a suspense account, which was visible
16 to Post Office."
17 So £5,000 of the £6,000 was attributable to wrongly
18 duplicated giros, the loss which had been left, about
19 £1,100, you couldn't account for on the information
20 available to you. Is it that sum, £1,100 that you ended
21 up in dispute with the Post Office over?
22 **A.** At that time, yes, it was, yeah.
23 **Q.** I think the first thing you did was to write a detailed
24 letter to the Post Office about it?
25 **A.** I did. Yeah.

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1 **Q.** Can we look at that, please, POL00004598, at page 134,
2 please. We can see this is dated 19 December 2000, so
3 about six days after the balancing issue emerged, and,
4 again, about two and a bit months after the installation
5 of Horizon at your branch and it must be noted, I think,
6 very early in the life of the Horizon system taken as
7 a whole; would you agree?

8 **A.** Yes, I would.

9 **Q.** You'll see that the heading of it is "Horizon Faults".
10 Can we read the letter together because this sets out
11 what might be an important account, early in the life of
12 Horizon. You refer back in the first paragraph to
13 a conversation and, as is good practice, you confirmed
14 it in detail in writing. You say:

15 "The balance at this office on [the 13th] was not
16 only very stressful but also very worrying. The
17 evidence that appeared during that day proved beyond any
18 doubt that the Horizon system cannot be relied upon to
19 give 100% accurate figures. The problem which was
20 highlighted to this office that day was with regard to
21 Giro Deposits and at one point the weekly returns were
22 showing a variance to the addition of the daily returns,
23 of over £6,000.

24 "The whole of that afternoon was spent making
25 a number of phone calls to the different helplines, one

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1 liable for losses on the cash account until such time as
2 100% guarantee can be given about the accuracy of
3 Horizon.

4 "I had been hoping to leave any comments in writing
5 about Horizon until the office is quieter in January and
6 then write a detailed submission about the cost we have
7 incurred with it (around £1,000), the problems with the
8 counter (staff working with money and stamp books on
9 chairs or on the shelf behind them), the very poor
10 layout of the screen and menus, the slowness of the
11 printers, the lack of report writing facilities, the
12 chaotic end of day and end of week procedures and the
13 problems of having to do 'office work' at a terminal on
14 the counter. Given time I shall produce the report for
15 you.

16 "Please do not think that I am being nothing but
17 negative about the system. I am a firm believer in the
18 way forward being through such a system. But bear in
19 mind my comments are made by someone who has had
20 considerable experience of [Electronic Point of Sale]
21 systems before joining the Post Office 1998. I first
22 began working with them in 1986 and have used a variety
23 of systems ..."

24 Reading on:

25 "So I do have some insight into those systems and

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1 of almost 1 hour long, and kept two of the three
2 terminals producing nothing but reports, at a peak
3 trading time when we had can you see out of the door,
4 though eventually I did manage to track down the
5 majority of the money. That said, the cash account for
6 that week is still showing a shortage of £1,182.81.
7 I can without any doubt attribute £368.50 of that to
8 Giro items that have been double entered and that I am
9 unable to track because of the way Horizon is set up.
10 Of the remaining £814.31 shortage, I am presuming that
11 £409.15 of that is the shortage from the previous week
12 that has become added to the total. This leaves
13 a difference of £405.16 which I am unsure of where it
14 comes from. It may well be a Giro system error as might
15 be the previous weeks £409.15 shortage or it may be
16 something else. Unfortunately, the current Horizon
17 system does not let you access previous transactions
18 adequately enough to track problems with shorts or overs
19 at the end of the week."

20 Continuing:

21 "Having spoken to the local Branch Secretary of the
22 Federation of SubPostmasters on these problems and
23 realising the problems I am experiencing are being found
24 by others around the country I really do believe it
25 would be unreasonable for Post Office Network to hold me

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1 would gladly be willing to offer constructive feedback
2 if asked.

3 "With regard to the current deficit showing on our
4 cash account for last week how do you want me to
5 progress this week's balance? Shall I just roll it
6 through and see what happens, or what?"

7 Then you ask for assistance.

8 So in that letter you make it clear, on a number of
9 occasions, that Horizon is at fault and you explain in
10 detail why, so far as you could tell, that was so; is
11 that right?

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

13 **Q.** You tell the Post Office that you're not alone and that
14 this was happening around the country.

15 **A.** That's what I understood, yeah.

16 **Q.** Did that information come from your local branch
17 Secretary of State at the NFSP?

18 **A.** It did.

19 **Q.** Was that Dave Foster?

20 **A.** It was Dave Foster.

21 **Q.** You ask a question "What should I do?", at the end?

22 **A.** Yes.

23 **Q.** Did you ever get a reply --

24 **A.** No.

25 **Q.** -- a written reply, to the raft of the points?

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1 **A.** No, I never did.
 2 **Q.** No reply to this letter at all?
 3 **A.** Never.
 4 **Q.** Can we move on, please, to page 140 in this bundle.
 5 This is a follow-up letter of 7 January 2002, so now
 6 over a year has passed. You're writing to the Post
 7 Office about this long in the tooth alleged shortfall.
 8 You say:
 9 "As you are aware, the cash account for this office
 10 is still showing an amount of £1,041.86 in the suspense
 11 account. This cumulative figure was placed in the
 12 suspense account towards the end of 2000 and I have no
 13 doubt at all that it was due to errors in the Horizon
 14 system over a number of weeks at that time. In my
 15 letters to Gerry Hayes [of] 19 December [which we've
 16 just looked at] and 16 July 2001 [I've skipped over that
 17 one because of time], neither of which did I receive
 18 a written reply to, I gave further details on this
 19 matter.
 20 "I really do think that enough time has now passed
 21 for Post Office to have resolved this issue and unless
 22 I receive a written comment to the contrary by the end
 23 of this month I will take it that this matter is closed.
 24 When I signed my contract with Post Office Counters
 25 I did not sign to accept the liabilities arising from
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1 take from the fact that [the Post Office] was willing to
 2 write off the considerable apparent discrepancy I had
 3 disputed that my complaints were valid, and that [the
 4 Post Office] was aware that was the case and wished to
 5 avoid the controversy on this matter, given that I was
 6 willing to assert my legal rights."
 7 Can we turn up, please, POL00004598, at page 143,
 8 please. Just look back at page 142, please. This is
 9 the letter of 6 March 2002 that you were referring to in
 10 your witness statement.
 11 **A.** Yes, that's right.
 12 **Q.** If we look at the third paragraph, there's the passage
 13 that you cited:
 14 "After due consideration of the facts surrounding
 15 [your] loss and of your report, Post Office has decided
 16 to take no further action in respect of the loss which
 17 will be written off."
 18 The Write Off Authority, if we just look at the
 19 second page that was included, if we could just scroll
 20 down a little bit, thank you. This is the unsigned
 21 version --
 22 **A.** Yes.
 23 **Q.** -- essentially:
 24 "I have received a Write Off Authority Voucher to
 25 the value of [the amount] which has been cleared from my
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1 the shortcomings of a less than adequate Horizon system,
 2 all liabilities from such a system are clearly the
 3 responsible of Post Office Limited or ICL Pathway.
 4 "Allowing this issue to drag on not only continues
 5 the stress and strain of the original problems but
 6 I fear also continually casts doubt over my honesty and
 7 that of my staff. Therefore I would greatly appreciate
 8 it if you would bring this matter to a head in order
 9 that we can move on."
 10 Can we turn to your Inquiry witness statement,
 11 please, at paragraphs 39 and 40, which are on page 12.
 12 You say:
 13 "Finally, by letter of 6 March 2002 I was notified
 14 that 'Post Office ... has decided to take no further
 15 action in respect of the loss' at my branch and that
 16 this will be written off. No reason was given, but
 17 I have since seen a copy of a 'Write Off Authority'
 18 voucher disclosed by [the Post Office] which gives the
 19 reason for the write off as 'Disputed Horizon Cash
 20 Account Shortage'.
 21 "The letter of 6 March also said that [the Post
 22 Office] had taken time to respond because '... it has
 23 been necessary to formulate a consistent response to all
 24 such cases'. I take from this that [the Post Office]
 25 was aware at the time of many such complaints. I also
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1 suspense account ... and the voucher has been cleared in
 2 the appropriate manner in the cash account number week
 3 number ..."
 4 Was that amount, £1,041.86, actually cleared out of
 5 your suspense account so you went back to zero in
 6 balancing terms?
 7 **A.** Yes, yes, it did.
 8 **Q.** So it didn't remain thereafter a shortfall which you
 9 were required to roll over?
 10 **A.** No.
 11 **Q.** Then can we look at the loss authorisation document,
 12 which you also referred to in your witness statement,
 13 that's POL00328099, page 3, please. I think that's
 14 "Loss Authorisation" document, if we just pan out so we
 15 can see all of it, please.
 16 I don't think this is something that you saw at the
 17 time; is that right? This is an internal Post Office
 18 document.
 19 **A.** That's correct, yeah.
 20 **Q.** But you got disclosure of it later; is that right?
 21 **A.** That's right.
 22 **Q.** We'll see that it seems to be in standard form. It's
 23 got your branch name and your FAD code, the amount of
 24 money, and it says:
 25 "The following decision has been made with regard to
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1 the loss at the above office which relates to an aged
2 shortage which the subpostmaster insists was
3 attributable to a Horizon
4 system/software/equipment/training failure."

5 Then three boxes or three options are given, the
6 second of which was the subpostmaster makes it good, the
7 third of which was an amount of it must be made good,
8 an amount of it will be written off, and the first of
9 which was the full amount will be written off and the
10 subpostmaster has been sent the appropriate voucher with
11 which to clear the loss of the amount. Yes?

12 **A.** Yes.

13 **Q.** Did you see this document, the writing off of a loss
14 because you said the loss was attributable to the
15 Horizon system, at the time of the dispute with the Post
16 Office in 2002 and 2003, ie before termination of your
17 contract?

18 **A.** No, no, I didn't see it. No, I didn't see it.

19 **Q.** So were you aware at that time that the Post Office
20 seemingly used a standard form with "delete as
21 appropriate" boxes on it?

22 **A.** No, I didn't, but, now that you mention it, I do recall
23 a conversation that the Retail Network Manager had at
24 the time with this department at my office, so I only
25 heard one side of the conversation, and it was about

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1 the Post Office believed that the suspense account was
2 used by subpostmasters to cover up theft and fraud.
3 Your evidence is that you were being transparent from
4 an early stage in the life of Horizon in your complaints
5 about Horizon discrepancies, about the use of the
6 suspense account, to hold over disputed sums whilst
7 continuing to assert that the money wasn't owed and
8 ought not to be made good; is that right?

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

10 **Q.** Did there come a time when that practice was challenged?

11 **A.** Not during my tenure. I understand it was later on.

12 **Q.** I think after this write off, there continued to be some
13 shortages/shortfalls shown on Horizon; is that right?

14 **A.** That is. That's right, yes.

15 **Q.** And --

16 **A.** It's not just -- sorry, you say shortages. It was also
17 overs and under. It was --

18 **Q.** So surpluses as well?

19 **A.** Surpluses, yeah.

20 **Q.** Did you seek to discover the cause of both the surpluses
21 and the shortages?

22 **A.** Yes. As much as we could.

23 **Q.** Did you encounter success?

24 **A.** On occasion, yes.

25 **Q.** Did it remain the case, however, that a sum just over

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1 arranging for this write off amount or a write off
2 voucher. And I seem to recall, and it stuck in memory
3 because of what it was, he said "Oh, it's another one of
4 the Horizon losses", and it's just one of those little
5 things that, you know, sticks in the back of your mind
6 that was said at the time, when the Retail Manager was
7 speaking to this department on the phone, arranging the
8 voucher.

9 **Q.** In any event, there existed a form in which a loss could
10 be authorised to be written off on the grounds that the
11 subpostmaster said the loss was attributable to
12 Horizon --

13 **A.** Yes, it did.

14 **Q.** -- and that's what happened in your case?

15 **A.** Yes.

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

17 Now, before you had authorisation to write this loss
18 off, you continued to roll it over from week to week?

19 **A.** Yes, I did.

20 **Q.** Was that done with the knowledge and approval of your
21 then Retail Line Manager?

22 **A.** Well, they were aware of it, they were certainly
23 informed that that's what I was doing, so ...

24 **Q.** We've heard from some Post Office staff, the evidence of
25 Susan Harding springs to mind particularly to me, that

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1 £1,000 was carried as shortage in the suspense account?

2 **A.** No, not to my recollection. There was a claim at the
3 very end of my contract that I think they said that the
4 office was owing something in the region of £1,200 or
5 £1,400 but --

6 **Q.** It's that I'm referring to.

7 **A.** Sorry?

8 **Q.** It's that I was referring to.

9 **A.** Yeah, but that wasn't carried as such. What happened
10 was that I refused to -- when we undertook our weekly
11 balance, you were then meant to put in money to make up
12 to the figure or take money out, if it was over in
13 there. I refused to do that. I rolled through the
14 shortages or the losses in there -- sorry, the shortages
15 or the overs each time. So it had a running total, it
16 was adjusted from week to week, because I really did not
17 know where the office was up to, you know, I had no
18 idea.

19 And often, some of these, where there had been
20 an error, might come back in a week or two weeks or
21 something of that -- that sort of time, or it could be
22 a lot longer, when the actual error was discovered
23 elsewhere and it can be corrected. But no, I never,
24 actually, reset, or zeroed the system but I just kept
25 rolling through the shortages and losses, and Post

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1 Office were aware of what I was doing.

2 **Q.** Did the installation of a new Retail Line Manager,
3 Mike Wakley, cause matters to be brought to a head in
4 that respect?

5 **A.** Eventually, yes.

6 **Q.** Can we look at that "eventually". POL00004598,
7 page 144, please. This is a letter to you dated
8 14 April 2003, "Reference: Losses and Gains". Just want
9 to read the first part of the first paragraph:
10 "Further to our conversation, you confirmed that you
11 have been rolling over losses and gains for the past two
12 years or more."
13 That's what you just described.

14 **A.** Yes.

15 **Q.** He says:
16 "I was unaware of this practice".
17 Then, in the second paragraph, he says:
18 "I am now instructing you, that with immediate
19 effect, you are required to make good the outstanding
20 loss and to cease with this current practice of rolling
21 over any losses and gains."
22 Can we see your reply, please, page 145. You say:
23 "I am in receipt of your letter ... 14 April [that's
24 the one we just read] confirming our conversation
25 regarding losses and gains at our office which have

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

2 **Q.** Can we look, please, at page 147 of this bundle. Letter
3 from Mr Wakley, 2 May. Scroll down.
4 "Thank you for your letter of 16 April [that's the
5 one we've just looked at], the content of which has been
6 noted.
7 "Nevertheless, I must point out that you are bound
8 by the Terms and Conditions of your Contract for
9 Services, which was acknowledged by you on 31 March
10 2003", and somebody has written in, correctly, I think,
11 1998.
12 That was you, was it?

13 **A.** Yes.

14 **Q.** "1998!":
15 "... accepting your appointment.
16 "To this effect you are charged with ensuring that
17 all accounts entrusted to you are kept in the form
18 prescribed by Post Office, by using the approved
19 accounting system ... and, therefore, in the event of
20 any losses occurring, these should be made good without
21 delay ...
22 "Accordingly, failure to comply with these
23 obligations can be construed as a breach of contract,
24 which could ultimately put your Contract for Services
25 'at risk'."

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1 always been rolled over since the installation of
2 Horizon. I appreciate that you may well have been
3 unaware of this practice but can assure you many other
4 Post Office staff knew of it.
5 "My comments regarding this were all well documented
6 in a number of letters ... such as that dated
7 19 December ... which like all letters was sent recorded
8 delivery.
9 "The problem with rolling over the losses and gains
10 is that I presume I would be accepting liability for
11 them which is something that I have pointed out in
12 writing to you since the introduction of Horizon here,
13 I am unable to do until such time I am able to access
14 the data that I am being asked to be responsible for.
15 As I have written previously 'The totally inadequate
16 report system has been made so complex it lacks the
17 ability to interrogate the system when you know the
18 information is inside', if I am unable to access the
19 data to check items it is totally unreasonable to expect
20 me to accept the liability from uncheckable data."
21 I think that reply speaks for itself but did this
22 exchange of correspondence, the new-ish, I think, Retail
23 Line Manager, raising the issue, requiring you to make
24 good the shortfall, to cease the practice, ultimately
25 lead to your contract being terminated?

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1 Over the page:
2 "I would therefore request that you acknowledge the
3 content of this letter within 10 days of its date of
4 posting confirming that your accounts are being
5 maintained in the correct fashion [and make good the
6 losses] as per your Contractual Obligations."
7 Then 149, please. Your reply to that letter:
8 "With regard to your letter [of] 2 May ..."
9 The first paragraph, I think you pick him up on the
10 typo:
11 "You refer me to section 12 of the contract ..."
12 Rather than what he has suggested to you, you're
13 liable to repay all losses, you point out that
14 section 12, in fact, states:
15 "'The subpostmaster is responsible for all losses
16 caused through his own negligence, carelessness or
17 error, and also for losses of all kinds caused by his
18 Assistants. Deficiencies due to such losses must be
19 made good without delay.'
20 "You rightly point out that I have agreed these
21 terms and I can confirm that I would gladly make good
22 any losses caused in these manners. But I can see
23 nothing in this clause which states that I am also
24 liable for data that I am unable to check."
25 That's a summary of the position you had been

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1 maintaining, I think, consistently since installation.
 2 **A.** Yes.
 3 **Q.** "To take an extreme, if the Horizon system said I owed
 4 £1 million, you would say I would have to make good the
 5 loss without delay and without question.

6 "There is no way I will agree to be held responsible
 7 for data I have input until such time as I am able to
 8 access the data that I am being asked to be responsible
 9 for. In trying to state that I have acknowledged such
 10 things in the Terms and Conditions of my Contract ...
 11 you are, in effect, purporting to vary this contract."

12 We can skip over the next paragraphs, which are
 13 about something else, and then go to the next page, 150,
 14 and then the letter ends.

15 So you correct the Post Office on the terms and
 16 conditions, you make it clear the point that many have
 17 missed -- that the contract does not oblige you to repay
 18 all losses -- and then you make the point of emphasis,
 19 the £1 million example, in your third paragraph. Was
 20 there any effort by the Post Office to engage with the
 21 points that you were making in this letter?

22 **A.** None at all, never addressed them.

23 **Q.** Can we turn, please, to POL00004598, page 30, that's the
 24 same bundle. Page 30, scroll down, please. Mr Wakley:

25 "In accordance with [your contract] I am writing to
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1 to go for -- they didn't go just under this, you
 2 know, any reason they wanted, three months' notice,
 3 without giving a reason.

4 **Q.** So it's a without-fault, without-reason --

5 **A.** That's right.

6 **Q.** -- termination, just on three months' written notice?

7 **A.** Yeah, that's it.

8 **Q.** But you'd had the £1,100 written off?

9 **A.** Mm-hm.

10 **Q.** You'd had the Post Office acknowledging that it was
 11 because of a genuine dispute over whether Horizon was to
 12 blame for it, over the operation of Horizon. You'd been
 13 rolling over other shortfalls and surpluses since then
 14 with Post Office knowledge, and then this arrives?

15 **A.** Well, it was -- it was a bit strange in a way because we
 16 were a very busy post office. In fact, it was a time
 17 when a lot of post offices were losing trade but our
 18 sales figures were extremely high in the region, we'd
 19 developed a lot of new business in there. But, you
 20 know, it was their decision to do it and so be it.
 21 I mean, I did offer, I did offer at one point, when
 22 there were discussions between the Retail Manager and
 23 myself, when we were heading in this direction, he was
 24 saying, "Come on, Alan, you know, change your mind, do
 25 this, do that", and all the rest of it, and I said,
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1 issue you with three months notice of termination of
 2 [your contract].

3 "The termination ... will take effect on 5 November
 4 2003."

5 So this is the letter that brought your contract to
 6 an end; is that right?

7 **A.** That is, correct, yes.

8 **Q.** The letter, of course, speaks for itself. It gave you
 9 no explanation for the reason for termination of your
 10 contract?

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

12 **Q.** Was any such explanation given to you by the Post Office
 13 at this time?

14 **A.** Never.

15 **Q.** It may seem an insensitive question, but how did
 16 receiving this notice make you feel?

17 **A.** Well, I was annoyed with them, but -- to put it mildly,
 18 but I think it was partly expected in a way because it
 19 was pretty obvious they were determined to -- they were
 20 after me, one way or another, and the build-up of
 21 correspondence over the period was certainly pointing in
 22 that direction. But I always find it quite interesting
 23 that I pulled them up on the point about trying to
 24 terminate me and my contract under clause 12 of the
 25 contract, but they didn't do it that way. They decided
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1 "Look, if you're unhappy with the way that I'm providing
 2 your service, then pay us back our initial investment
 3 and take the post office away". I would have been quite
 4 happy for them to do that and I probably wouldn't have
 5 been here today on that basis.

6 But, I mean, it's -- they just decided they were
 7 going to -- I felt they were going to make a lesson of
 8 my case because a number of other people knew what was
 9 going on at that time, and I think it was something that
 10 Post Office liked to try to give lessons of how they
 11 were in charge.

12 **Q.** Can we just look, before the morning break, at some
 13 reasoning that the Post Office gave subsequently for
 14 terminating your contract. To start with, can we look
 15 at POL00107538. Page 11, please. This is a letter
 16 written to an MP, Betty Williams, in relation to
 17 a letter that she wrote as a constituency MP to Allan
 18 Leighton, the then Chairman of the Post Office. It's
 19 29 October. If we just go to the second page, scroll
 20 down, we can see who it's written by: Dave Barrett, Head
 21 of Commercial Urban Area for Wales, The Marches and
 22 Merseyside.

23 Back to page 1, and look at the second paragraph.

24 "Briefly, we've given notice to Mr Bates, the
 25 present subpostmaster, that we're withdrawing from our
 60

1 contract with him."
2 Then this:
3 "This is because we've lost confidence in his
4 willingness to conduct the job in the manner expected."

5 Was that ever explained to you, that they had lost
6 confidence in your willingness to conduct the job in the
7 manner expected?

8 **A.** No, not at all.

9 **Q.** Can we look, please, at POL00031815. This is
10 a presentation on Horizon integrity prepared by Dave
11 Smith. It's undated and it seeks to tell a story about
12 the integrity of Horizon. It's, we may find in due
13 course, an interesting account overall but I just want
14 to look at what it says about you on page 6. Scroll
15 down, please.

16 Mr Smith says:

17 "On the cases I am aware, Bates had discrepancies,
18 was dismissed because he became unmanageable."

19 Was that ever explained to you, that you became
20 unmanageable?

21 **A.** No, not at all.

22 **Q.** Then Mr Smith says of you that you:

23 "... clearly struggled with accounting and despite
24 copious support did not follow instructions."

25 Firstly, did you struggle with accounting?

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1 termination is that I had not only uncovered limitations
2 and potential errors with the Horizon system but that
3 I continued to question the Post Office on the
4 contractual relationship between subpostmasters and the
5 Post Office."

6 Was that your belief at the time?

7 **A.** Yeah, it is a good summary of how I felt.

8 **Q.** Does it remain your belief now?

9 **A.** Oh, yes.

10 **MR BEER:** Mr Bates, thank you.

11 Can we take the morning break, please. There is
12 a slight glitch with the transcription service, which
13 I think means we need to take 20 minutes rather than our
14 usual 15.

15 **SIR WYN WILLIAMS:** All right, so what time shall we resume?

16 **MR BEER:** I think that means 11.55.

17 **SIR WYN WILLIAMS:** 11.55. All right, see you all then.

18 (11.34 am)

(A short break)

20 (11.55 am)

21 **MR BEER:** Sir, good morning.

22 If we continue, please, Mr Bates with August 2003.

23 You remember where we are in the narrative. You've been
24 given notice of termination of your contract. I think
25 one of the first things you did was to write to the

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1 **A.** No, not at all.

2 **Q.** Were you given copious support?

3 **A.** No.

4 **Q.** Did you seek to follow the instructions that you had
5 been given by the Post Office?

6 **A.** Basically, try and bankrupt myself? No, I didn't, not
7 to that extent.

8 **Q.** If these after-the-fact reasons or justifications for
9 the termination of your contract are not, on your
10 understanding, correct, what do you understand to be the
11 reason for the termination of your contract?

12 **A.** Well, I mean, basically, I think it was because: (a)
13 they didn't like me standing up to them in the first
14 instance; (b) they were finding it awkward; and (c)
15 I don't think they could answer these questions and
16 I think they had a feeling I was going to carry on in
17 a similar vein going forward.

18 **Q.** Just lastly then, can we look at POL00024194. This is
19 your witness statement. Can we look at paragraph 170.
20 I'm afraid I haven't written which page that is, try
21 about 25 -- hopeless, try about 30 -- try about 35.
22 Then if you can scroll forward to paragraph 170, please.
23 You say -- this is your High Court statement for the GLO
24 Common Issues trial:

25 "I have little doubt that the reason for my

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1 Chairman of the Royal Mail Group Plc; is that right?

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

3 **Q.** Can we look at that letter, please, POL00107538. We
4 will see this is dated 7 August 2003 to Mr Allan
5 Leighton, Chairman of Royal Mail Group Plc. We will
6 look at the detail in a moment but can I ask you in
7 general terms what the purpose was in writing to the
8 chairman of Royal Mail Group Plc. By this time you'd
9 received Post Office's decision to terminate your
10 contract; what was the point?

11 **A.** Well, I was still in post, if you like, for the next few
12 months. So I thought it was well worth trying to write
13 to the Chairman to make him aware of what was going on
14 because he may well have not known. So I'm hoping that
15 he might be able to undertake some sort of review into
16 it and look at the case for us, or whatever, take it on
17 board a little bit more seriously.

18 **Q.** This is, of course, still, taking a step back,
19 relatively early in the entire narrative of the scandal,
20 August 2003.

21 **A.** Yeah.

22 **Q.** Horizon had only been rolled out for three years or so?

23 **A.** Yeah. But it was wrong. Sorry, I knew it was wrong
24 then, there were things wrong with it and, having heard
25 that others had had problems with it as well, surely

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1 someone should have been looking at all of this and
 2 taking these things into consideration.
 3 Well, in that sense, you're obviously right because
 4 many people were yet to be terminated; many people were
 5 yet to be prosecuted; many people were yet to be
 6 convicted; and many people were yet to go to prison.
 7 **A.** Mm.
 8 **Q.** Can we look at what you said to the Chairman. First
 9 paragraph.
 10 "I am writing to you with regard to a letter I have
 11 just received from Post Office Limited giving me formal
 12 notification of their decision to terminate my
 13 subpostmaster contract. As Chairman of the Group
 14 responsible for Post Office Limited, I thought it
 15 important that you should be aware of what is being
 16 undertaken in your name."
 17 You very much personalised things in that first
 18 paragraph.
 19 **A.** Yes.
 20 **Q.** Did you expect this letter to at least be seen by the
 21 person to whom you wrote it?
 22 **A.** I certainly hoped it would be. I can't do more than
 23 draw their attention to it. I can't force them to read
 24 it but, if you don't write to them, then they'll never
 25 know.

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1 possible to have an opportunity to see in detail the
 2 management style applied by Royal Mail Group to the very
 3 public face of the local post office. It is again
 4 trying to use what seems to be so often described as its
 5 outdated Stalinistic management approach, in order to
 6 bludgeon its will onto the poor subpostmaster with
 7 an issue that could bankrupt every sub post office in
 8 the country. Whilst I appreciate that principles can be
 9 expensive, I cannot agree to any position which would
 10 leave me and every other subpostmaster liable for claims
 11 of millions of pounds from the Post Office without any
 12 redress or access to data to check such claims."
 13 Is that a reference to the audibility or
 14 visibility, the reporting function available to
 15 subpostmasters on the system?
 16 **A.** Well, certainly the lack of it, yes.
 17 **Q.** "My only defence until I can find an organisation
 18 willing to offer support is to ensure that the media and
 19 all those politicians who represent a ward with a sub
 20 post office, as well as everyone who runs a sub post
 21 office or who uses one, has an opportunity to read all
 22 the facts.
 23 To that end, these documents enclosed and others
 24 will shortly be available online, once the hoarding at
 25 the front of our building advertising our website,

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1 **Q.** At paragraph 2:
 2 "Please find enclosed a copy of that letter, as well
 3 as copies of previous correspondence and notes regarding
 4 the problems in question ..."
 5 I'm not going to go through the previous
 6 correspondence or your notes upon it:
 7 "... which I've tried to keep in a chronological
 8 order. In reality, this matter should never have
 9 reached this stage but the extremely poor handling by
 10 Post Office Management in the past has led to the
 11 situation which could result in us not only losing our
 12 business but [something else]. Unlike the Post Office,
 13 I do not have endless funds to fight this injustice
 14 through the courts."
 15 Why was that in your mind at that stage, the
 16 relative funds available to each side to fight a case
 17 through the courts?
 18 **A.** Well, I suppose, realistically, I had been speaking with
 19 lawyers at that time and I was being advised that you
 20 probably wouldn't be able to afford to take Post Office
 21 on. It just -- you know, it was just an impractical
 22 situation from a financial point of view, more than
 23 anything else, regardless of the case.
 24 **Q.** Moving on to the rest of the paragraph:
 25 "I do realise it's imperative for as many people as

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1 www.postofficevictims.org.uk is ready in a week or so.
 2 Originally, I had registered postofficevictim.me.uk to
 3 use but as the launch will undoubtedly bring up many
 4 other cases from across the country, it was thought
 5 a larger and less personal site would be more
 6 appropriate."
 7 Over the page.
 8 "It is important to make clear I have not breached
 9 my contract. I will not be ceasing to trade on
 10 5 November 2003. If I did, I certainly would be in
 11 breach of my terms.
 12 "If you read the enclosed documentation, it is all
 13 self-evident. I am sure you can tell my back is up
 14 against a wall but until the hoarding is ready and in
 15 place and all the web pages are downloaded to the
 16 server, I'd welcome any option that would resolve this
 17 matter with the minimum of fuss, without the national
 18 publicity this matter is bound to draw, hence my letter
 19 to you as a last attempt to reach a sensible
 20 conclusion."
 21 Now, I don't think you got a reply from Mr Leighton,
 22 did you?
 23 **A.** No, I got one from his office. Somebody did acknowledge
 24 it, if I recall.
 25 **Q.** Can we look at POL00040354. You can see this is

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1 27 August:
 2 "Thank you for your letter dated 7 August addressed
 3 to Allan Leighton, which has been forwarding to me for
 4 reply."
 5 Can we look at the second page, please, and scroll
 6 down. You can see that it is from somebody in the
 7 Operations Department, Ria MacQueen, a Case Liaison
 8 Manager. Go back to the first page, please.
 9 Then if we look in the second paragraph, she says:
 10 "I have now completed my enquiries ... they have
 11 taken longer than expected."
 12 She says:
 13 "I have spoken with a number of the personnel
 14 involved in the search for a solution to the situation
 15 at the branch. Although I regret that the situation has
 16 reached the point of termination of your contract, I am
 17 confident that the various teams concerned in the events
 18 have worked hard to provide support and assistance to
 19 you in a consistent and sympathetic manner."
 20 Was that your experience?
 21 **A.** No, but this is Post Office's view. It's not mine.
 22 **Q.** "This support included a number of onsite attendances to
 23 assist with balancing ..."
 24 Did that occur?
 25 **A.** I had two people visit to try to assist with balancing
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1 requirement that postmasters must make good losses or
 2 gains when misbalances occur."
 3 In fact it isn't clear on that at all, that's
 4 a complete misstatement of the contract:
 5 "It is evident you have consistently refused to do
 6 this, even when specifically requested to do so by the
 7 Area Management Team. The contract also states that
 8 either party ... may terminate it with three months
 9 notice without a reason being given."
 10 That's what we've done.
 11 Then:
 12 "I am sure you have carefully considered the idea of
 13 your website. I feel you should be aware that the use
 14 of the Post Office Limited's imagery on your website may
 15 constitute trademark infringement."
 16 You say in your witness statement that, despite you
 17 having sent the Chairman a full clip of the relevant
 18 correspondence with notes about each item within it, to
 19 quote your witness statement:
 20 "... predictably, the response of the Post Office
 21 was to ignore the content and predictably to fail to
 22 investigate the real issues."
 23 Why, in your view, was that the predictable response
 24 of the Post Office?
 25 **A.** It was the way they tried to deal with things, which you
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1 but they could access the system no further than
 2 I could, so it was absolutely no help at all.
 3 **Q.** "... and also to provide extra training on the Horizon
 4 system."
 5 Did you get additional training on the Horizon
 6 system?
 7 **A.** Not that I can recall.
 8 **Q.** "The aim was always that of achieving a solution to the
 9 difficulties you were experiencing in managing
 10 transactions and processes at the branch.
 11 "The Horizon system [at the branch] has been
 12 reviewed and interrogated in response to your complaints
 13 and the reports from the Horizon Field Support Team and
 14 the NBSC have confirmed that there is nothing inherently
 15 wrong with the Horizon system installed at the branch."
 16 Was the system installed at the branch, to your
 17 knowledge, reviewed and interrogate?
 18 **A.** Not that I'm aware of. No one ever came to the place.
 19 I've always been confused over "nothing inherently
 20 wrong", that turn of phrase. It just seems a little
 21 unusual. "Nothing wrong" I can understand but
 22 "inherently wrong" seems like a back-covering sort of
 23 phrase.
 24 **Q.** Then read on, please, if we scroll down, thank you:
 25 "The subpostmaster contract is clear on the
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1 experienced through their Area Manager -- I mean, it was
 2 constantly Post Office was in the right and you were
 3 always in the wrong, and it was -- it just seemed to be
 4 their nature.
 5 **Q.** You tell us in your witness statement that this reply
 6 was the "usual box ticking exercise written entirely
 7 from the Post Office's perspective"?
 8 **A.** Of course, yeah, that's what it was.
 9 **Q.** The last paragraph concludes:
 10 "The management team has been wholly professional in
 11 the management, deliberation and investigation of your
 12 issues."
 13 Had, in fact, the issues that you raised been
 14 investigated at all?
 15 **A.** Not that I'm aware of.
 16 **Q.** Can we turn to paragraph 52 of your witness statement,
 17 please, your Inquiry witness statement, which is
 18 page 16.
 19 We asked you a question of what data you believed
 20 you needed to access in order to determine the cause of
 21 discrepancies in the Horizon generated branch accounts.
 22 You say:
 23 "... I required access to all data, even in
 24 a read-only format, held on the system in relation to
 25 all input by me and my staff which happened at the
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1 branch ... in respect of verifying information regarding
 2 those transactions, or the accounts that they ultimately
 3 formed a part of, I could only check transaction logs
 4 that were available on Horizon for limited periods of
 5 time or use the limited range of information and reports
 6 I had access to, and which could be printed from Horizon
 7 terminals, comparing them to stock in the branch. I had
 8 no real way of checking information held in Horizon that
 9 came from Post Office itself, or from its clients such
 10 as Camelot or indeed the way in which those had been
 11 reconciled with transactions in the branch."

12 Then if we go further on, please. Scroll down,
 13 please, to 54:

14 "Whilst the position as stated in the letter [that's
 15 the letter we just read] is that they had reviewed and
 16 interrogated and concluded that there was nothing
 17 'inherently wrong with the Horizon system', I had seen
 18 no evidence of the apparent review and interrogation
 19 they had claimed to carry out. I was still without the
 20 data which I had been requesting for a number of years.
 21 Nor had they discussed their findings with me. I do not
 22 believe that there was any investigation or evidence
 23 that the purported investigation had taken place."

24 Have you seen any evidence to date that the
 25 purported investigation, that's referred to in the

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1 a result of which Post Office wrote this letter on
 2 19 January 2013. If we look at the second page --
 3 sorry, just scroll up to the bottom of the first page.
 4 We can see that it's written by Richard Barker, the then
 5 General Manager of the Commercial Network. Go to the
 6 top, please. He says to Betty Williams MP:

7 "I promise to write to you once a comprehensive
 8 review had been undertaken of the issues raised by
 9 [you]. That review has been completed by a senior
 10 manager within Post Office, with considerable experience
 11 in the handling of disputes and subsequent appeals.

12 "The conclusions of that review, which I fully
 13 endorse, are that the termination of [your] contract was
 14 done with proper investigation, coupled with proper
 15 warnings and appropriate offers of additional training
 16 and support. No evidence was found which in any way
 17 substantiates the various claims being made by
 18 Mr Bates."

19 Mr Barker goes as far as saying that:

20 "The decision to terminate [your] contract was not
 21 only correct it was the only sensible option. The best
 22 way is to consider the matter closed."

23 Were you involved in any such comprehensive review?

24 A. No, and that was one of my big objections. No one ever
 25 came and spoke to me about it or tried to speak to me

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1 letter sent on behalf of the Chairman, had taken place?

2 A. No, I haven't. I've only ever seen claims that it had
 3 taken place.

4 Q. So far as you know, was the data that you are speaking
 5 about in these paragraphs, that you needed access to in
 6 order to understand the cause of an apparent shortfall
 7 or an over, common to all cases in sub post offices that
 8 you later came across, ie that no one could, actually,
 9 in the Post Office branch, get access to the data they
 10 needed to see what had happened?

11 A. Not that I'm aware of, anyway.

12 Q. You, I think, wrote to your MP; is that right?

13 A. Correct.

14 Q. Can we look, please, at POL00040368. You tell us in
 15 your witness statement that you wrote to your MP about
 16 your case -- that's Ms Williams, is that right --

17 A. That's right.

18 Q. -- on 27 October 2003, and she in turn raised it with
 19 Post Office and with the Minister. She received a reply
 20 saying that they had taken a decision to review the case
 21 in its entirety. You say that was carried out behind
 22 closed doors and didn't involve any contact with you; is
 23 that right?

24 A. That's correct.

25 Q. Then she wrote again to Post Office and your MP, as

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1 about it or tried to understand what the problem had
 2 been, as has been said for or as has been recorded; it
 3 was carried on behind closed doors.

4 Q. So we've seen you write to your MP, we've seen you write
 5 directly to Allan Leighton and the reply, we've seen
 6 your MP write to Post Office, and we've seen this reply
 7 trying to ask questions. It's suggested in some parts
 8 of your witness statement that they were being shut down
 9 or fobbed off by the Post Office; is that your view?

10 A. That seems to be the way the business works, yeah.

11 Q. Can we turn, please, to POL00328099. If we just pan out
 12 a little bit, it may be that these five paragraphs on
 13 this undated piece of paper are the comprehensive review
 14 that has been referred to in the correspondence.

15 A. It may be but I hadn't seen them until recently.

16 Q. No. I just want to look at what the author, Sandy
 17 Stephen, says. They say:

18 "I have reviewed [if we scroll to the top paragraph,
 19 please] all the files from the date of Horizon
 20 installation until the termination of Bates' contract
 21 and read all the subsequent correspondence. I have
 22 summarised the salient points.

23 "... following Bates' assertions against the Horizon
 24 system, there were clear attempts made by several people
 25 to ascertain if there were systems problems. Eventually

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1 it was decided to write off the debt and a clear signal
2 was given to Bates that all future losses would be
3 recovered. Significantly, further training and support
4 was given to Bates at that time."

5 Is that true?

6 **A.** Well, it's true that that's what it says, yes.

7 **Q.** I meant in reality?

8 **A.** Yeah, no, I'm afraid it wasn't that way, no.

9 **Q.** "Later it transpired, and Bates admitted, that he
10 continued to roll over losses."

11 Did you have to admit to this or were you, in fact,
12 telling your line managers --

13 **A.** Sorry --

14 **Q.** -- that you were doing --

15 **A.** -- I had already informed them, and I wasn't hiding the
16 fact at all. They were well aware of what --

17 **Q.** So:

18 "Later it transpired and [you] admitted that you
19 continued to roll over losses and had done so since the
20 introduction of Horizon. He received a formal letter
21 instructing him to stop the practice [that's true, we've
22 seen that, from Mr Wakley] and make good any losses
23 [that's also true]. He did not [that's also true].
24 Losses continued to be made and rolled over and the
25 Retail Line Manager sought advice from Contracts and

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1 investigation, formal warning, coupled with support and
2 additional training. Yet [you] continued to flaunt and
3 ignore the legitimate instructions from your Retail Line
4 Manager."

5 Then we see a sentence that gets cut into the letter
6 that we just read:

7 "The decision to terminate was not only right, it
8 was the only sensible option", which is what led me to
9 think that this was the comprehensive review and
10 investigation that had been referred to.

11 It says that you continued to "flaunt the legitimate
12 instructions of the Retail Line Manager". Did you
13 "flaunt" his instructions?

14 **A.** No, I just pointed out what I was doing and the reasons
15 why I was doing it but they'd never respond to me.

16 They'd never discussed the issue about data and data
17 access and liability and holding -- and how long that
18 liability lasted for, and all the rest of it. When
19 I went into Post Office, it was sold to me at the time
20 as you were in partnership with the business but you
21 very soon learnt that this was a very one-sided
22 partnership. I mean, basically you do whatever you're
23 told, was your side of the partnership, and they just
24 didn't seem to like it if you raised any queries even --
25 no matter how justified they were.

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1 Legal Services before terminating the contract.

2 "From the evidence contained in the files it's clear
3 that Retail Line conducted themselves correctly and
4 acted in accordance with the rules."

5 Then this:

6 "Leaving aside the anecdotal evidence on file which
7 demonstrates Bates' unsuitability as a postmaster ..."

8 Was that ever put to you, that you were unsuitable
9 to be a postmaster?

10 **A.** No, but they'd appointed me in the first instance.

11 **Q.** Are you aware of what anecdotal evidence there might be
12 which demonstrates your unsuitability to be
13 a postmaster?

14 **A.** If -- I mean, I have records of that time, which were
15 statements from the Retail Network Manager or my current
16 Retail Network Manager at that time, which was
17 Mike Wakley, to say how well the office was doing, and
18 well done for all the hard work. I mean, it's
19 a nonsense.

20 This was just them flexing their muscle and just
21 deciding they're right and I was wrong.

22 **Q.** They point out Post Office has the absolute right to
23 terminate a contract with three months' notice. That's
24 also one of the true statements in this document:

25 "It was done in this instance following proper

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1 **Q.** In relation to this part of the narrative, can we
2 lastly, please, look at POL00004598, page 3, please.
3 Scroll down, please.

4 This is part of a slew of correspondence, that I'm
5 not going to investigate in detail, over whether you
6 would continue to provide a service within the Post
7 Office as an interim measure and the arrangements that
8 were being made for the Post Office to come into the
9 branch and take away what they say belonged to them.
10 You say:

11 "At no time did Post Office ever ask me if I would
12 continue providing a service as an interim measure.
13 I would not deny you did make a sort of request to use
14 our premises and our facilities to have someone else
15 come in to provide a service at a time when you had
16 taken away our livelihood, investment and savings but,
17 as you don't seem to live in the real world, I can tell
18 you that this was just received as an insult.

19 "It seems your 'organisation' will do anything and
20 everything to try to keep the failures of Horizon
21 hidden, regardless of who they have to trample down on
22 the way, such as us or our community.

23 "I can assure you of my continued and now increased
24 resolve to bring the real facts of what is going on to
25 those who will have no choice but to act, regardless of

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1 whether it takes years."

2 In relation to the penultimate paragraph there, that
3 the Post Office would do anything and everything to try
4 to keep the failures of Horizon hidden, why did you
5 think that they were trying to keep the failures of
6 Horizon hidden?

7 **A.** I think a number of reasons. First off, I think their
8 field personnel didn't understand it to any great depth
9 and they just seemed to follow the corporate mantra that
10 Horizon is robust, and that's it, and everyone else is
11 wrong. They didn't seem to want to engage in useful
12 discussions about how to try to improve things. Any
13 that they did make, any approaches they made, were very
14 much a surface. It was just for show, rather than to
15 change things in many meaningful way. It was a variety
16 of things at that time.

17 **Q.** Was what you wrote in that paragraph based on your own
18 experience or were you drawing from wider experiences of
19 others, then?

20 **A.** Well, first off, it -- I had some experience of those
21 types of systems, and it was obvious it was extremely
22 poorly designed, and it didn't really do the job it was
23 meant to and there were a huge amount of problems.
24 I kept on hearing problems, little problems, from all
25 sorts of people. Other subpostmasters, because I used

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1 a matter of principle."

2 Is that how you felt?

3 **A.** It was because it goes back to an earlier letter that
4 they could hold me liable for any amount in there.
5 That's what I -- that's what they wanted me to agree to
6 and that was wrong.

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

8 I think one of the first things you did after
9 termination of your contract was to set up the website,
10 the www.postofficevictims.org.uk.

11 **A.** Yes, I did and I also wrote to the local newspaper to
12 explain to the local community what had gone on and,
13 fortunately, the local paper printed my letter in full
14 to explain what had happened with Post Office. I also
15 had large-scale posters blown up of that letter which
16 were attached to the front of the door of our premises
17 and remained there for quite a time.

18 **Q.** Postofficevictims.org.uk was the nascent group that
19 subsequently became the JFSA; is that right?

20 **A.** It -- I suppose it was like a seed. I wouldn't say
21 organisation. It was what I set up initially there to
22 try and attract and draw other cases, and also as
23 a warning to others about getting involved with Post
24 Office: this is the type of organisation you are
25 planning to get involved with. And there were other

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1 to go to regional Federation meetings as well, and you
2 did sit and chat and everyone had a moan and a whinge
3 about it, and you heard of stories where people were
4 literally taking their computers and the whole systems
5 and leaving them on the pavement outside and telling
6 Post Office to come and collect it. Those were the sort
7 of stories that were running around at the time in
8 there.

9 But I think it was the lack of real engagement in
10 all of this to try to resolve the problems, address the
11 problems, and resolve them, which made me think that
12 they'd just, you know, they'd just put up a stone wall
13 on the whole thing.

14 **Q.** Your last paragraph might be considered to be
15 prophetic --

16 **A.** Yeah. Yeah --

17 **Q.** -- I don't suppose when you wrote it, you would end up
18 20 years later sitting here answering my questions.

19 **A.** No.

20 **Q.** In the clip of materials that identified or led to the
21 Sandy Stephen comprehensive review that we saw, the five
22 paragraphs on the one page, in that clip of material is
23 a note from Mike Wakley, your Retail Line Manager,
24 contributing to that document and he said that:

25 "At this time Alan believes his actions are now

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1 things I did, as well, around that time to try to raise
2 the profile of the issue.

3 **Q.** Can we turn to page 28 of your witness statement,
4 please, paragraph 92. If we could zoom in on that,
5 please, you say:

6 "My main objective for creating the JFSA was to
7 expose the truth. I wanted to create a body of former
8 and current subpostmasters and branch assistants which
9 could provide a community for all those going through
10 the same experiences with the Post Office. I knew that
11 I was not alone in my dealings with the Post Office and
12 the JFSA was set up in order to ensure that other people
13 in the same situation as myself knew that they too were
14 not on their own. As mentioned above, there was
15 a complete lack of support from Post Office and
16 I believe those in similar circumstances required
17 support."

18 I have read elsewhere that one of the reasons that
19 you set up the group was that you and others had felt
20 that you had been abandoned by every other organisation
21 so that you had to group together; is that right?

22 **A.** Yeah, and I think that's true what you're saying there:
23 it was myself and others as well. It wasn't -- I know
24 that -- I seemed to take the lead in it but there were
25 a lot of others -- certainly in the early days, there

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1 was a great deal of support from --

2 **Q.** Which other organisations had abandoned you and others?

3 **A.** Well, certainly the Federation. The Federation was

4 absolutely useless. I mean, they were just another

5 department of Post Office, as I believe it still is

6 these days as well. But they --

7 **Q.** Why do you think they're just another department of the

8 Post Office?

9 **A.** Well, I -- at one time, I believe they had an office in

10 Post Office headquarters but, ignoring that, it depends

11 which bit we're going -- if you go right back to the

12 early days, the 2002s, 2003s, and when I was going to

13 the Federation meetings, I know I tended attended one

14 meeting where a subpostmaster at the back of the meeting

15 group, he started saying, "I've just had my post office

16 taken off me and I'd had problems with Horizon", and all

17 the rest and the Federation -- the Federation Exec

18 people who were there escorted him out of the back of

19 the place. They took him away, out of that meeting.

20 I know perfectly well, when my contract was

21 terminated, I went to a Federation meeting to try --

22 well, a local branch one. I went to a Federation

23 meeting where I tried to speak on behalf of that, and

24 there was one of the National Executive Federation

25 members at that meeting and he stopped -- tried to stop

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1 **A.** Yeah, I think that's the one, yeah.

2 **Q.** You had written a couple of letters to him, I'm not

3 going to show now --

4 **A.** No.

5 **Q.** -- of December 2003 and January 2004 and he notes that

6 Betty Williams has written to Allan Leighton. We've

7 seen that. He says:

8 "I can go no higher within the Royal Mail Group than

9 Allan Leighton. I am sure that your Member of

10 Parliament will have had as much if not more success

11 than I would. Hopefully you will have more information

12 from that route."

13 Then the last paragraph, I think, is the one you're

14 referring to:

15 "We are not in a position to provide information

16 regarding other subpostmasters' dealings with Post

17 Office Network. We are aware there are some disputes

18 from around the time that offices migrated from the

19 manual system to the Horizon system but we are now of

20 the view that Horizon works well and there are no real

21 problems with post offices which are operated by the

22 Horizon system."

23 Was that essentially the NFSP position as

24 communicated to you: Horizon works well, there are no

25 problems in post offices with it?

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1 me speaking. He refused to say this -- I should be

2 allowed to talk about such things at the meeting and, if

3 it hadn't been for the local Chairman, who was Noel

4 Thomas, at that time, if it hadn't been for him, talking

5 and moving this chap out of the way, I'd never have been

6 able to get over what had happened to me and explain to

7 the others in there.

8 So there was an awful lot of pressure from the

9 Federation to support Post Office. In fact, there is --

10 I don't know if you are going to show it, there is

11 correspondence from the Federation where they actually

12 support Post Office's position in terminating my

13 contract. I don't know whether you're going to cover

14 that.

15 **Q.** Slightly out of order but I think I know what you're

16 talking about.

17 **A.** Sorry, you asked me about the Federation.

18 **Q.** I'm the one that's supposed to bowl the fast balls!

19 I think, if I can cover drive it back, it's

20 POL00215384.

21 **SIR WYN WILLIAMS:** If you're right, that's a good slip

22 catch!

23 **MR BEER:** Is that the document you're talking about,

24 a letter to you from Colin Baker the General Secretary

25 of the NFSP?

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1 **A.** Yeah, and it was very much -- I mean, the Federation

2 always seemed to try to manage any of the problems

3 around Horizon, I can recall a conference, Federation

4 conference, main conference, I think it was in 2002,

5 around there, in -- it was in Llandudno, which is why

6 went to it, and there are a whole host of people raising

7 queries, delegates raising queries about Horizon during

8 conference, and it got to such a state that they

9 couldn't move on with conference and conference decided

10 to set up a separate committee to look into a Horizon

11 issues, and for members to report to them, and they

12 would then discuss them with Post Office.

13 **Q.** To what extent has the NFSP assisted you in establishing

14 the facts in your case?

15 **A.** None.

16 **Q.** To what extent has the NFSP assisted you in seeking

17 redress in your case?

18 **A.** None.

19 **Q.** To your knowledge, what role did the NFSP play in

20 assisting other subpostmasters when it was alleged

21 against the subpostmaster that they had a shortfall?

22 **A.** I have not heard of one instance where they have

23 successfully done anything of that nature.

24 **Q.** I think you tell us that you've been informed that the

25 Post Office would often only allow a representative of

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1 the NFSP or a friend to sit in on interviews where
 2 suspension or termination was contemplated?
 3 **A.** That's correct.
 4 **Q.** You tell us in your statement that the NFSP nearly
 5 always agreed with the Post Office and said sometimes to
 6 the subpostmaster "Come on, own up, tell them what you
 7 did with the money"?
 8 **A.** Yeah.
 9 **Q.** Are these accounts that other subpostmasters have given
 10 to you?
 11 **A.** Yes, they are.
 12 **Q.** To your knowledge, has the NFSP ever once helped
 13 a subpostmaster in any court case in which the operation
 14 of the Horizon system or the integrity of the data which
 15 it produces has been questioned?
 16 **A.** No.
 17 **Q.** To what extent did the NFSP assist in the Group
 18 Litigation?
 19 **A.** None at all.
 20 **Q.** To what extent has the NFSP assisted others following
 21 the Group Litigation in obtaining redress?
 22 **A.** I don't know.
 23 **Q.** Thank you. If we can go back to where we were in the
 24 account. That can come down from the screen. Thank
 25 you. You'd set up the JFSA and you tell us that, from
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1 problems. They were not forthcoming with the details in
 2 there. Certainly disclosure is a very good example of
 3 that.
 4 I mean, cases used to take months and months to
 5 progress. I am thinking of the initial Mediation
 6 Scheme, for example, and it -- you just felt you --
 7 though they were there, you were still banging your head
 8 against a brick wall to try to get anything out of them,
 9 because they were determined to protect the brand at any
 10 cost and they didn't want anything coming out or being
 11 disclosed that might cause damage to Post Office.
 12 **Q.** You ceased work as a subpostmaster in November 2003.
 13 **A.** Yeah.
 14 **Q.** Yes?
 15 **A.** Yes.
 16 **Q.** I think you've not returned to other work since then
 17 because, instead, you've dedicated to campaigning for
 18 accountability, justice and redress; is that right?
 19 **A.** Yeah, I mean, I think the key issue has always been to
 20 expose the truth, right from the outset, because the
 21 other thing sort of always felt -- they followed on.
 22 Once you know the truth about issues, the rest will
 23 hopefully follow on afterwards.
 24 I mean, I didn't set out to spend 20 years doing
 25 this. I hadn't expected to be doing this so much by
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1 the late 2000s onwards, so from about 2009 onwards, you
 2 have spent an estimated 30 to 40 hours a week
 3 campaigning in relation to Post Office and Horizon; is
 4 that right?
 5 **A.** Easily, yes.
 6 **Q.** Can we look, please, at page 27 of your witness
 7 statement, and paragraph 87 at the top. You say:
 8 "The challenges were faced at every step of the way
 9 since the Post Office would obstruct me. The gravity
 10 and the enormity of the problem was not recognised by
 11 others in power, including Government, and it became
 12 clear that the only way to achieve progress was through
 13 a formal legal route, which has its own challenges,
 14 including obtaining the necessary funding for this
 15 route."
 16 You say there that "challenges were faced at every
 17 step of the way, since the Post Office would obstruct
 18 me"; what had you got in mind when you were saying that?
 19 **A.** Well, disclosure is a good one. They -- I mean, we went
 20 through -- before we got to the court case, we went
 21 through a whole host of schemes and they always used to
 22 say, "Yes, we'll be supportive, yes, we'll try and" --
 23 you know, with MPs and all the rest of it -- "Yes, we'll
 24 get on board with it, yes, we're looking for the truth",
 25 and all the rest of it, but all they did is cause
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1 myself, but it got more and more complex and it was
 2 very -- it was harder and harder to share out and work
 3 as a bigger group to take things forward. So, yeah,
 4 I did finish up sort of leading, in a way, in there but,
 5 obviously, going back to the others when there was
 6 an opportunity for their endorsement.
 7 It was encouraging along the way, one of the things
 8 we did do is bring people together and a lot of
 9 people -- it was a bit like -- I don't mean this in
 10 a derogatory way but it's a bit like stray lambs.
 11 People were lost out there. They were the only ones,
 12 they were wandering around wondering, you know, what
 13 have I done wrong? They're suffering so badly. But
 14 once you manage to bring them together to meet others in
 15 a similar situation, it had enormous effect on their
 16 lives.
 17 **Q.** You spent two decades undertaking this work, presumably
 18 thousands of hours?
 19 **A.** Yes.
 20 **Q.** Why, in your view, has that been necessary?
 21 **A.** Because the further down the road you went with it, the
 22 more you realised you couldn't let it go.
 23 **Q.** I think you at one stage attempted the strategy of
 24 speaking to Government about this?
 25 **A.** Yeah, yeah.
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1 Q. Can we turn, please, to correspondence with Ed Davey MP
2 in May 2010. That can come down from the screen. Thank
3 you.

4 So to put this into context, to orientate ourselves,
5 May 2010, JFSA was well established now.

6 A. Yeah, yes.

7 Q. The Computer Weekly article had been written by Rebecca
8 Thomson on the 11 May 2009?

9 A. Mm-hm, yes.

10 Q. And I think you were indeed interviewed by her as part
11 of her work?

12 A. Yes, that's correct.

13 Q. Her work drew together the facts about a number of
14 cases?

15 A. Yes.

16 Q. Can we look then at the letter you wrote to Ed Davey MP
17 on the 20 May 2010, UKGI00016119. As we can see from
18 the way you've addressed the letter at the top, Minister
19 for Postal Affairs within the Department of Business,
20 Innovation and Skills sometimes called BIS. So I think
21 to put his position in context there, he was the then
22 Minister for Postal Affairs, the new government having
23 been formed 14 days earlier on 6 May 2010 -- general
24 election that year was 6 May, so he's 14 days in.

25 Can we read the letter together. You say:

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1 would be most appropriate and will, without doubt,
2 easily find evidence of the error ridden system.

3 "I am sure you will appreciate that there is not
4 a single computer system that does not, from time to
5 time, suffer from errors, especially when the size and
6 level of complexity of the programs associated with the
7 Horizon system. The Post Office blindly state that
8 there are not, nor have wherever been, any system
9 errors, so subsequently anything wrong is entirely the
10 responsibility of the subpostmaster, as that is what
11 they have agreed to when signing their contract. This
12 is a contract that was produced in 1994 and does not
13 address nor identify new technology but they are still
14 using it to intimidate and prosecute subpostmasters."

15 Over the page:

16 "The weight of evidence we have been collating over
17 the years continues to grow and gain in standing. It is
18 only the flat refusal of the Post Office to allow
19 experts to examine the system which is holding back this
20 major scandal from breaking. But with the growing
21 numbers in JFSA and the support we are now finding from
22 the IT community and the media, it is just a matter of
23 time until the real truth about the Post Office and
24 Horizon is exposed.

25 "Over the years, I have personally submitted written

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1 "I am writing to you with regard to your position as
2 Minister on behalf of JFSA. We are an independent group
3 of ex and serving subpostmasters who have suffered at
4 the hands of the Post Office and their Horizon system
5 ever since it was first installed. Our website outlines
6 how we came about and our aims, as well as offering
7 sample cases that were provided by some of the group.

8 "Currently the group numbers close to 100, although
9 we continue to be joined by others who have learnt of
10 JFSA and have found that there is nowhere else to turn
11 for help.

12 "In every instance, the Post Office acts as judge,
13 jury and executioner and the individual is deserted by
14 their reputed representative organisation, the National
15 Federation of SubPostmasters. Invariably, these cases
16 all stem from the flaws of the Horizon system that the
17 Post Office introduced and which they refused to admit
18 has ever suffered from a single problem.

19 "The evidence is there to be found by anyone in
20 a position of being able to unlock doors, instead of
21 placing barriers in the way of those pursuing the
22 information. Our organisation has access to a number of
23 specialists who could provide the questions and analyse
24 the resulting data if required, though an independent
25 external investigation instigated at ministerial level

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1 details of all of this to the Select Committee of the
2 DTI, and then on two other occasions to that of BERR
3 and, put simply, the information has either been buried
4 or disappeared. Others of JFSA have followed the route
5 of contacting their MPs who would take the matter up
6 with the Post Office on their behalf. Subsequently,
7 they are stonewalled or 'handled' by the Post Office
8 often with off the shelf answers where they only change
9 the name and address.

10 "I writing to you on behalf of the group, I am
11 asking for a meeting where we can present our case to
12 you. Much has appeared in the press over the last few
13 days that Government is going to change and I only hope
14 that is true. If it is, the abuse of subpostmasters
15 that has been going on under the protection of the
16 previous Government may well come to an end."

17 So your letter to Mr Davey MP provides some detail,
18 either in the body of the letter or through
19 cross-referencing to your website as to the issues that
20 subpostmasters were facing and informs Mr Davey that the
21 Post Office's conduct amounted to a scandal.

22 A. Yes, very much so.

23 Q. Can we look at the reply please ABAT00000001:

24 "Dear Alan Bates,

25 "Thank you for your letter of 20 May requesting

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1 a meeting. Since 2001, when the Royal Mail (which
2 includes Post Office Limited) was set up as a public
3 limited company with the Government as its only
4 shareholder, the Government has adopted an arm's length
5 relationship with the company so that it has commercial
6 freedom to run its business operations without
7 interference from the shareholder.

8 "The integrity of the Post Office system is
9 an operational and contractual matter for the Post
10 Office and not government and, whilst I do appreciate
11 your concerns and those of Alliance members, I do not
12 believe that a meeting would serve any useful purpose."

13 You tell us in your witness statement that you took
14 offence at the term "arm's length" to describe the role
15 that the Government played in relation to overseeing and
16 monitoring the Post Office. Why?

17 **A.** Well, it's because of the structure, wasn't it? The
18 Government was the sole shareholder, they were the
19 owners, as such, of all of this, and how can you run or
20 take control or -- sorry, take responsibility for a --
21 an organisation without having some interest in there,
22 or trying to be in control? In fact, Government were
23 pumping huge amounts of money into Post Office, year
24 after year. So, you know, they need to be held
25 responsible for it, they need to be addressed, really,

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1 letter that came in response from a letter I wrote to Ed
2 Davey, and I'm not sure whether you're going to go to
3 that.

4 **Q.** Let's see.

5 **A.** Let's see, yes.

6 **Q.** You tell us in your witness statement -- I'm not going
7 to turn it up, it's paragraph 104 -- that this response
8 from Mr Davey was disappointing because he had not taken
9 account of anything which you had said in your letter
10 and indeed appeared to be a standard template form of
11 response; is that correct?

12 **A.** Yes, yeah.

13 **Q.** I think you didn't keep those feelings to yourself at
14 the time. You, in fact, sent a reply to Mr Davey on
15 8 July 2010. Can we please look at UKGI00016099. You
16 say:

17 "I have to say that your response to me dated 31 May
18 [the one we just looked at] regarding the very serious
19 issues I had raised was not only disappointing but
20 I actually found your comments offensive. It seems,
21 that, though there are new politicians in post, the
22 Government hasn't changed. The letter you sent is
23 little different to the one I received seven years ago
24 from the Minister responsible for post offices at that
25 time and so many more lives have been ruined in the

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1 about the way that they've been going on, and it's very
2 hard to engage them in it. Not nowadays, they're a bit
3 more interested these days but, I mean, at that time, to
4 try to get Government to take it on board seriously, it
5 was --

6 **Q.** Before a four-part drama on ITV?

7 **A.** Well, no -- in fairness, yes, the drama was great and
8 did a lot for us but we've had enormous cross-party
9 support from many MPs over the years and some of whom
10 I think you'll see, you know, shortly. But, I mean, you
11 know, the time this letter was written was in 2010, and
12 I think at that time we were involved with a firm called
13 Shoosmiths, a law firm called Shoosmiths, and there had
14 been a number of meetings bringing people together and,
15 in fact, Shoosmiths had been working with the MPs, so we
16 were growing a body, we were growing an interest, and
17 a number of the other MPs were finding their own
18 constituents who'd had problems, subpostmaster problems.
19 So it was starting to become a little more gelled as
20 an organisation, and the number -- with a substantial
21 number -- and growing number in there.

22 And it was very much why we felt government should
23 have been involved at that time. I mean, you show me
24 this letter from Ed Davey and I -- I don't know what
25 your script is but I'm more concerned about another

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1 interim because of that same attitude.

2 "It is not that you cannot get involved or cannot
3 investigate the matter. After all, you do own 100 per
4 cent of the shares and, normally, shareholders are
5 concerned about the morality of the business they own.
6 It's because you've adopted an arm's length relationship
7 that you have allowed a once great institution to be
8 asset stripped by little more than thugs in suits, and
9 you have enabled them to carry on with impunity
10 regardless of the human misery and suffering they
11 inflict.

12 "You can listen to your civil servants telling you
13 that these are really an operational matter for the Post
14 Office to deal with. You can even listen to the Post
15 Office telling you Horizon is wonderful, that there's
16 never ever been a problem, it is inherently robust, and
17 these are just a few malcontents trying to cause
18 trouble, or you can meet with us and hear the real truth
19 behind Horizon and what the Post Office is actually up
20 to.

21 "Your civil servants in the Post Office will not
22 tell you about Post Office staff harassing sick
23 ex-subpostmasters, demanding written promises of money
24 or they will send the police around. They won't tell
25 you that the Post Office, watching post offices heading

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1 into trouble, fails to provide any help and then waits
 2 until the problem shows a loss of £20,000 plus so that
 3 the subpostmaster then falls foul of the Proceeds of
 4 Crime Act. They won't tell you that when someone wants
 5 to sell their post office and has a suitable buyer, Post
 6 Office will turn down the applicant to drive that
 7 business into the ground. You won't hear about
 8 subpostmasters endingly requesting audits of their
 9 offices and having to wait for up to five years for
 10 someone to turn up in offices turning over £5 million
 11 a year. Neither will they tell you of the cases where
 12 the Post Office have run an audit, closed the Post
 13 Office, bankrupting the owner who loses his business,
 14 house and family, holds a pending court case over him
 15 for 18 months, then drops the charges and walks away.
 16 Nor will they tell all about how they are stopping
 17 subpostmasters selling on the Post Office side of their
 18 business in order to recover the original investment.
 19 They won't even tell you that the Horizon system is
 20 designed to entrap subpostmasters so that they can
 21 easily finish up in prison, just by trying to open up
 22 the day after a trading period balance.

23 "This is just a taste of some of the practices your
 24 company is carrying out in your name day after day.
 25 They brandish decision a big legal stick, fail to

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1 a rescheduled meeting with you on 7 October to discuss
 2 the JFSA's claims that endemic flaws in the Horizon
 3 system have resulted in a number of subpostmasters
 4 having their contracts wrongly terminated and, in many
 5 cases, prosecuted for false accounting.

6 If we scroll down, please. It sets out the
 7 background to the meeting, recalling the history of your
 8 two letters, describing the second as being more
 9 confrontational. Then it says, this the fourth line of
 10 that paragraph:

11 "That letter was followed by reports that Channel 4
 12 were planning to run a news item on the JFSA campaign.
 13 We then recommended offering a meeting in response to
 14 this second request [that's the letter we've just read]
 15 'for presentational reasons', against the background of
 16 potential publicity playing heavily on Government
 17 Minister 'refusing to meet victims of government owned
 18 Post Office Horizon system which has systemic faults
 19 resulting in wrongful accusations of theft/false
 20 accounting'."

21 So this records that the recommendation to Mr Davey
 22 was that he should offer to attend a meeting for
 23 presentational reasons against the background of
 24 potential publicity, ie the Channel 4 News item. When
 25 you attended the meeting, can you recall whether

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1 provide evidence in court and rely on a clause in the
 2 1994 contract about a subpostmaster being liable for any
 3 loss from their office, however it occurs. Yet their
 4 shoddy Horizon system is the root cause of all of this.
 5 Post office themselves lose thousands of to pounds from
 6 each of the Crown Offices that they run using Horizon
 7 although their staff are not treated as guilty until
 8 proven innocent but a subpostmaster is. The whole of
 9 this scandal is teetering on the edge of a precipice at
 10 this point but it's still not too late for you to
 11 reconsider convening a meeting to discuss this issue
 12 involved if you are prepared to keep an open mind."

13 It seems that, following your letter, Mr Davey
 14 agreed to a meeting?

15 **A.** Yes. I think so.

16 **Q.** At paragraph 105 of your witness statement, there's no
 17 need to turn it up, you confirm that you attended
 18 a meeting with Mr Davey on or about 7 October and you
 19 tell us that you don't, in fact, have a note of the
 20 meeting and can't recall details of the meeting.

21 The Inquiry is in possession of a briefing document
 22 for Mr Davey for the purposes of his attendance at that
 23 meeting with you. Can we see whether we can look at
 24 that please, UKGI00000062. It's dated, as you'll see,
 25 5 October 2010, and the purpose of the document is

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1 Mr Davey appeared to engage with the substance of the
 2 issues that you were raising?

3 **A.** I don't recall.

4 **Q.** You don't recall whether he did or not --

5 **A.** No, I --

6 **Q.** -- or you don't --

7 **A.** -- I don't recall the detail of the meeting and I'm
 8 quite certain that, if there had been something positive
 9 that was coming out of it, I'd have remembered that.

10 **Q.** If we scroll on on the briefing note for Mr Davey, it
 11 sets out the objectives. He is to:

12 "... seek to establish at a very early stage whether
 13 legal action against Post Office is imminent or planned
 14 and it will be prudent to adopt a *sub judice* approach in
 15 the comments you make. [He] should emphasise the issues
 16 raised by the JFSA are operational or contractual
 17 matters ... should make the point about government
 18 having an arm's length relationship; establish whether
 19 the JFSA is committed or planning to initiate action
 20 against the Post Office; note that it will be for the
 21 relevant legal process to decide on the JFSA case;
 22 demonstrate you are prepared to hear the JFSA's side of
 23 the story but make it clear you are not in a position to
 24 offer substantive comment and avoid committing to
 25 setting up an independent or external review of

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1 Horizon."

2 Do you recall whether Mr Davey responded to the
3 points you made in detail in your letter of 8 July?

4 **A.** No, I don't recall, sorry.

5 **Q.** To your mind, was Mr Davey aware at the conclusion of
6 your meeting that a scandal, in your view, had taken
7 place and was in the process of still taking place?

8 **A.** I don't recall.

9 **Q.** Did Mr Davey alter the position that he had set out in
10 the letter, that the Government enjoyed an arm's length
11 relationship with the Post Office in the light of the
12 concerns that you had raised?

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

14 **Q.** What was the outcome of the meeting?

15 **A.** I can't think of anything startling that came out of it,
16 otherwise I'd probably recall it but I suppose -- this
17 has been like a long journey, you sort of -- you finish
18 one thing, you move on to the next -- been there, done
19 that, tried that, so let's just keep going. So I think
20 it was just another step along the way.

21 **Q.** Did you walk away from the meeting with Mr Davey having
22 said that he was going to do anything at all?

23 **A.** Not that I can recall, which I can recall from other
24 ministers that I've met.

25 **Q.** Are you able to remember any positive development

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1 repeatedly informed about the concerns of subpostmasters
2 and Crown Office employees, the formation of the JFSA,
3 and indeed the GLO, in which they say that the Post
4 Office is an arm's length body, that the matters raised
5 were matters for the Post Office to deal with and that
6 the Post Office was independent of Government.

7 **A.** Mm. I mean, I do think a lot of the ministers, a lot of
8 them come in for stick in the Inquiry, and all the rest
9 of it, and I'm sure some of it is deserved, but
10 I actually hold the Department and I hold the Civil
11 Service more to blame in a lot of these instances, why
12 things never progressed at the time. Because I'm sure
13 between them and Post Office briefing ministers, they
14 were briefing them in the direction they wanted to brief
15 them in, not that was for the benefit of the group or
16 the individuals in there, because of the positions that
17 they felt they were in and that should be taken at that
18 time. And also knowing that they probably have other
19 organisations hammering away and nagging at them, but
20 they were going to probably wait and see who got the
21 further -- who got the furthest. But do think it's --
22 I do certainly hold the officials far more guilty in all
23 of this than the politicians.

24 **Q.** You tell us, finally before lunch, in paragraph 298 of
25 your witness statement, that around this point, the

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1 arising from the meeting?

2 **A.** No.

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

4 Looking at the way that the Horizon scandals
5 developed, what view do you take of the arm's-length
6 approach that the Government took in relation to its
7 oversight of the Post Office?

8 **A.** I think it should have been involved or got involved far
9 earlier on and, in fact -- I don't want to pre-empt
10 where you're going but there was -- I think one of the
11 responses I think I got from Ed Davey's office at
12 a later time, which -- oh no, it might have been
13 a different minister, I'm sorry. I may be jumping the
14 gun then.

15 It was a response that I'd written to one of the
16 ministers for a meeting but the -- and to inform them
17 that full letters of intent had been issued by the
18 lawyers, Shoosmiths, at that time, but the response
19 didn't come from the Minister; it came from the
20 Shareholder Executive, ie Government. So they were
21 fully aware that legal proceedings were potentially
22 about to begin.

23 **Q.** Throughout your statement, you refer to the responses of
24 Government Ministers across the years -- Pat McFadden,
25 Ed Davey, Norman Lamb, Jo Swinson, and others, on being

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1 point being after the settlement of the Group
2 Litigation, the Government abandoned the line that this
3 was all a matter for the Post Office and moved on to the
4 new line that it had been misled by the Post Office. Is
5 that your view?

6 **A.** Yeah, I don't think they could deny anything else, could
7 they really?

8 **MR BEER:** Thank you very much, Mr Bates.

9 Sir, if that's an appropriate moment, can I ask
10 that -- I think it's 1.05 now. Can we reconvene at
11 1.55?

12 **SIR WYN WILLIAMS:** Yes.

13 **MR BEER:** 1.55, please.

14 **SIR WYN WILLIAMS:** 1.55 everyone, yes.

15 (1.03 pm)

(The Short Adjournment)

16 (1.54 pm)

17 **MR BEER:** Good afternoon, sir.

18 **SIR WYN WILLIAMS:** I think we're about to start, if we may,
19 please.

20 **MR BEER:** Mr Bates, we left off before lunch by looking at
21 correspondence with Ed Davey. Can I turn to Mr Davey's
22 successor, Norman Lamb MP, and on 25 February 2012, you
23 wrote to him. Can we look at that letter, please,
24 POL00107331. Thank you.

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1 I think, from public records, that --

2 **SIR WYN WILLIAMS:** Just hang on a second.

3 **MR BEER:** I think from public records it's the case that

4 Mr Lamb had taken over as Minister for Postal Affairs on

5 3 February 2012, Mr Davey having been promoted to become

6 Secretary of State for Energy and Climate Change, and so

7 you were here writing again shortly after a change in

8 post; is that right?

9 **A.** Yes, yes.

10 **Q.** If we look at the letter, you say you're writing on

11 behalf of the JFSA, as you did with the former Minister:

12 "On that and subsequent occasions I wrote to draw

13 his attention to the plight of subpostmasters at the

14 hand of Post Office Limited [the reference number was

15 given] and it will provide an outline of our concerns.

16 "During November 2010 I met him at his office ..."

17 I think that was October 2010.

18 "... to raise many of the issues which have been

19 causing devastation and distress in the subpostmaster

20 community. Following the meeting, I understand he

21 queried a number of points with Post Office Management

22 and he seems to have taken them at their word."

23 On what was that based? Can you recall, that

24 following the meeting you understood that Mr Davey had

25 queried a number of points with Post Office Management

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1 look at them in the interests of time, we look at

2 page 3, you tell us in the second paragraph:

3 "The survey remained online for eight days."

4 **A.** Yes.

5 **Q.** It was a SurveyMonkey led survey. Then, over the page

6 to page 5, some examples. I'm not going to go through

7 all of this:

8 "Do you have regular balance shortages that you have

9 to put money in to address?"

10 77 per cent of respondents said yes.

11 **A.** Yes.

12 **Q.** Going back to page 1 of the letter, please. The last

13 paragraph or penultimate paragraph:

14 "Previously, we offered to work with your department

15 to assist with uncovering this major scandal and I now

16 extend that offer to you."

17 You got a reply to this letter, I believe.

18 **A.** Yes, yes.

19 **Q.** Can we look at that, UKGI00016112? If we just blow up

20 the main text, from Norman Lamb. I think you'd followed

21 it up in the meantime with a chaser on 20 March, which

22 is why it refers in the first paragraph to letters of

23 25 February, which is the one we've looked at, and

24 20 March, which we haven't. He apologises for the delay

25 in replying, and he says:

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1 and he seems to have taken them at their word.

2 **A.** Well, nothing changed. Nothing changed.

3 **Q.** "I write to you on this occasion to request a meeting to

4 discuss this matter further with you. As you will see

5 from previous correspondence, solicitors are now acting

6 on behalf of a number of victims of Post Office Limited

7 but the law moves slowly and, in the meantime, many more

8 subpostmasters will suffer. Whilst JFSA very much

9 reflects the views of those who have fallen victims to

10 the failures of Post Office Limited's Horizon system,

11 I want to draw your attention to the enclosed survey,

12 which has just taken place. As you will see, it has

13 been completed by serving subpostmasters, with their

14 anonymity ensured to safeguard them from reprisals.

15 I am sure you will find the results disturbing and in

16 total conflict with the assurances given by Post Office

17 Limited to your predecessor and no doubt yourself, if

18 you were to raise our concerns with them."

19 Who conducted the survey?

20 **A.** Well, I did, really, via the website. I think we only

21 had it up for about a week. It was a very short, sharp

22 survey, just to get some sort of feedback from

23 subpostmasters of what extent things happened before

24 people started to abuse the survey.

25 **Q.** I think, on the subsequent pages, if we just quickly

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1 "As you're aware from your contacts with my

2 predecessor, Ed Davey, the concerns raised by the JFSA

3 relate to operational and contractual matters for the

4 Post Office and, as the shareholder, Government has

5 an arm's length relationship with the company and [does

6 not I think that should say] have any role in its

7 day-to-day operations. I also understand that legal

8 action against Post Office is under way [on behalf,

9 I think that should say] of a number of JFSA members.

10 "Taking into account that any meeting would take

11 place within this overall context, I would ask you to

12 contact my diary manager, if you would still like to

13 arrange a suitable date."

14 Taking the point about an arm's length relationship

15 meaning that the Government has no role in operational

16 and contractual matters but, nonetheless, offering

17 a meeting.

18 You, I think, know that you attended the meeting

19 that's referred to in that paragraph, although you can't

20 recall the date. You say it was mid-2012. We know from

21 other evidence that it was on 27 June 2012, so you're

22 exactly right. You tell us in your statement -- that

23 letter can come down, thank you -- that Mr Lamb appeared

24 to be willing to listen to you.

25 **A.** Yeah, it's the first time I thought a minister was

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1 actually taking on board the concerns we were raising
 2 with him and he did seem to be genuinely concerned about
 3 it.
 4 **Q.** Did you form the impression at the meeting with Mr Lamb
 5 that he understood that a scandal had developed?
 6 **A.** I think -- I think he was starting to recognise there
 7 was a real problem.
 8 **Q.** Did you form any view as to whether or not Mr Lamb was
 9 going to continue to rely on the justification that the
 10 Government had an arm's length relationship with the
 11 Post Office?
 12 **A.** I don't think that's the way his support, if it was
 13 support, for our cause, went. I think it probably
 14 manifested itself in a different way, but I could be
 15 wrong on that.
 16 **Q.** It's fair to point out that this meeting on 27 June 2012
 17 ought to be viewed in the context of some other
 18 developments that had taken place in the meantime?
 19 **A.** Yeah.
 20 **Q.** If we can just reference those without going into the
 21 details, there had been meeting with James Arbuthnot and
 22 Oliver Letwin?
 23 **A.** Yeah.
 24 **Q.** A small group of MPs had joined and had met with senior
 25 Post Office Management and, on 18 June 2012, they had

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1 **Q.** Can we turn, then, to the appointment of Second Sight.
 2 We know from your written evidence and the documents
 3 that we've got how it was that the idea of
 4 an independent review came to be conceived and carried
 5 into effect and that Second Sight were to be appointed
 6 in order to conduct the investigation or the review.
 7 How did you first feel when it was suggested that Second
 8 Sight be brought in to undertake an investigation or
 9 a review?
 10 **A.** We're talking now of the MP case review.
 11 **Q.** Yes.
 12 **A.** Suspicious. We were highly suspicious of it because
 13 where they'd been brought in to, if you like, whitewash
 14 it on behalf of Post Office, because Post Office brought
 15 them forward to ourselves to see how we thought they
 16 would get on. But, I mean, as time went on with Second
 17 Sight, we had more and more confidence in their
 18 independence in it, but initially, we were highly wary
 19 of them.
 20 **Q.** Was that because they were being paid for --
 21 **A.** Yeah, in a lot of things --
 22 **Q.** -- by Post Office?
 23 **A.** By Post Office, yeah. And that's been a concern down
 24 the line with all the different schemes, that Post
 25 Office has been funding them. I've always said, and

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1 agreed to commission an independent review?
 2 **A.** Yeah.
 3 **Q.** Did you know those things at the time of the meeting
 4 with Mr Lamb?
 5 **A.** I was aware of what was going on there and I think --
 6 I could be wrong, this is my reading of the situation.
 7 I would not be surprised at all whether -- this is what
 8 I'm saying, that Norman Lamb perhaps showed his support
 9 somewhat differently, maybe putting a quiet word with
 10 Post Office that maybe they should support some sort of
 11 MP or whatever investigation. That was my impression.
 12 I could be wrong. It's just that the timings seemed to
 13 work quite well. Everything seemed to slot into place
 14 there.
 15 **Q.** After Norman Lamb was replaced -- he was in this office
 16 for a short period of time, six months or so --
 17 **A.** Yeah.
 18 **Q.** -- did you pursue the matter immediately with his
 19 successor?
 20 **A.** I don't recall. I think we were following another route
 21 at that time, weren't we?
 22 **Q.** Ie the Second Sight --
 23 **A.** Yeah, that's right.
 24 **Q.** -- Review?
 25 **A.** Mm.

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1 I continue to say now, throughout the whole of the
 2 period with all of this sort of scandal that's been
 3 going on, it's been about control of the narrative and
 4 it's something that Post Office was incredibly keen to
 5 do. They had the money, they had the powers. They
 6 wanted to brief the MPs, they wanted to do X, Y and Z,
 7 they wanted to sit on the committees of all of these
 8 things. They wanted to pay for everything in there.
 9 And it was -- it always has been the concern, this
 10 controlling the narrative. I mean, I think they lost
 11 that at the time we got to the GLO or just after the GLO
 12 but, I mean, up until then, they -- I think it was their
 13 approach to managing the whole of this situation.
 14 **Q.** Looking at the work of Second Sight as a whole and, in
 15 particular the Post Office's approach to it, did you
 16 form a view on the basis of what the Post Office said
 17 and what the Post Office did --
 18 **A.** Well, I --
 19 **Q.** -- as to whether the Post Office wanted the
 20 investigation to succeed to engage openly and
 21 transparently with it and for the truth to emerge?
 22 **A.** I don't know. They used to say at the meetings that
 23 they wanted the truth as well but, I mean, I had a lot
 24 of faith in James Arbuthnot, who was like the lead MP
 25 supporter for us, and I think, actually, as it quotes in

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1 the drama, what other choice did we have at that time as
2 well? And it seemed a way of taking it forward, at
3 least people starting to investigate and look seriously
4 at these cases, and, you know, let's see how it went,
5 let's see how we get on, yeah.

6 **Q.** You said, "What other choice did we have"?

7 **A.** Yeah.

8 **Q.** Why did you feel you had no other choice?

9 **A.** Well, we had no money, the legal option wasn't available
10 to us at that time, there seemed a willingness. There
11 seemed, by Post Office, albeit it might have been
12 a reluctant willingness, but there did seem to be
13 a willingness by Post Office at that time, and I mean
14 the MPs were quite positive about it at that time,
15 obviously wary, but they were quite positive. So it did
16 seem a good way forward, at least to start with.

17 **Q.** Can I just briefly explore the extent of the JFSA and
18 your involvement in the appointment of Second Sight.
19 You tell us in your witness statement, it's
20 paragraph 109, that you and the JFSA were not involved
21 in the appointment of Second Sight, albeit MPs were keen
22 to seek your approval of Second Sight's appointment.
23 Can we look at a few documents please on that, starting
24 with POL00107174. We can see that, if we scroll down
25 a little bit, just to get the email, an email from Ron

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1 that the whole thing couldn't be buttoned up today. He
2 asked whether Ron Warmington would be prepared to come
3 back for a three-person meeting in James Arbuthnot's
4 office. Ron Warmington of course offered to do that."

5 Then if we go to page 3, please. If we scroll down
6 a little bit, just three paragraphs from the bottom:

7 "In regard to Alan Bates and the JFSA, whilst James
8 Arbuthnot clearly wants Alan Bates' buy-in, he doesn't
9 want to give Alan Bates the impression that he, Alan
10 Bates, has a power of veto over who carries out the
11 review, its scope and how it is to be carried out.

12 "The meeting concluded with James Arbuthnot
13 confirming on behalf of all present that they are
14 satisfied that Second Sight is a suitable choice and it
15 now remains to get Alan Bates and JFSA concurrence."

16 So it seem, would you agree, that the MPs wanted
17 your approval on behalf of the JFSA, in order to, as its
18 put "button up" Second Sight's appointment.

19 **A.** Yes.

20 **Q.** Would you agree that it wasn't therefore necessarily
21 a done deal, the appointment of Second Sight, without
22 your approval?

23 **A.** No, but I don't think we were going to be able to hold
24 them sort of hostage over it, as well. I think they'd
25 have gone on without it but, obviously, they preferred

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1 Warmington of Second Sight to Susan Crichton, Simon
2 Baker and copying in his colleague, Ian Henderson on
3 4 July. It's a report of a meeting that day with MPs
4 and it says in the second paragraph:

5 "As well as James and Janet ..."

6 That's James Arbuthnot and Janet Walker; is that
7 right?

8 **A.** Correct.

9 **Q.** His Chief of Staff?

10 **A.** Yes.

11 **Q.** There were the following, and all four MPs set out, and
12 a representative of Andrew Garnier. Oliver Letwin sent
13 his apologies. Then scrolling down a bit, about halfway
14 down the page:

15 "JA [James Arbuthnot] stated that it was a pity
16 that, having cleared it that the JFSA leader Alan Bates
17 could attend, in the end he was unable to do so at short
18 notice."

19 So it's right, is it, that you were invite to attend
20 the meeting with MPs to discuss whether Second Sight
21 should be appointed?

22 **A.** Yes.

23 **Q.** Then:

24 "JA clearly wanted to and now wants to get some buy
25 in from Alan Bates and seemed genuinely disappointed

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1 to have our blessing.

2 **Q.** I think you therefore attended a meeting with scale Kay
3 Linnell and Second Sight.

4 **A.** That's right.

5 **Q.** Can we look at that, please, POL00096817. At page 2, at
6 the foot of it, please, an email from James Arbuthnot to
7 Paula Vennells:

8 "I have just completed a very good meeting with Ron
9 and Ian from Second Sight and you. You were accompanied
10 by a forensic accountant, Kay Linnell. Both asked some
11 challenging questions of Ron and Ian, which they
12 answered to Mr Bates' and Ms Linnell's satisfaction."

13 Do you recall attending that meeting and coming away
14 with it having expressed satisfaction that Second Sight
15 were suitable appointees?

16 **A.** Yeah, I think so, yeah.

17 **Q.** Therefore, you essentially agreed to their appointment?

18 **A.** Oh, yes.

19 **Q.** So, to that extent, would you accept that you and the
20 JFSA were both, therefore, involved in the appointment
21 of Second Sight?

22 **A.** To that extent, yes.

23 **Q.** Can we turn to Second Sight's remit, please. You tell
24 us in paragraph 111 of your statement that you don't
25 recall being involved in setting Second Sight's remit or

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1 terms of reference. Again, can we look at some
 2 documents in relation to that. POL00143976. If we look
 3 at the email at the bottom of the page, from Simon Baker
 4 to you on 14 November, Mr Baker, the Head of Business
 5 Change, saying he works for the Post Office and is
 6 involved in supporting the Second Sight investigation:
 7 "Following on from your conversation with Paula
 8 Vennells and James Arbuthnot, we have updated your draft
 9 immunity agreement so that it addresses both your
 10 concerns.
 11 "This is a draft document. Please call me once you
 12 have had a chance to review.
 13 "We will also send a copy to Kay Linnell to ensure
 14 she is kept in the picture."
 15 What was the immunity agreement about, please?
 16 **A.** I don't clearly recall but I know there was -- we had
 17 concerns about anyone coming forward to any of the
 18 schemes there that there might be some sort of -- Post
 19 Office may well, I don't know -- there might be some
 20 sort of retribution by Post Office for anyone that --
 21 and what we wanted was some sort of agreement that such
 22 an instance wouldn't happen in there, and I think that
 23 hopefully -- and I'm pretty certain they did approve
 24 something in the end, as well.
 25 **Q.** Can we look, please, at the document that was attached

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1 "Inquiry is not asked to investigate or comment on
 2 general improvements which might be made, it's not
 3 a mediation or arbitration."
 4 Does the remit described there essentially set out
 5 the terms of reference?
 6 **A.** I think it does. I mean, it was early days for us as
 7 a group to be involved with this type of scheme, so
 8 we're a little bit led by what was thought in there but
 9 we felt it encompassed the main concerns at an early
 10 stage, yes.
 11 **Q.** Here the remit is said to consider and advise on whether
 12 there are systemic issues or concerns with the whole
 13 system?
 14 **A.** Yeah.
 15 **Q.** Was that JFSA's aim?
 16 **A.** Well, it was to try to establish the truth about it,
 17 yeah.
 18 **Q.** Is that how it ended up?
 19 **A.** Well, I think there was a slight disagreement over the
 20 word "systemic issues" and how far they extended and all
 21 that issue but, yeah, basically that's where it started
 22 from.
 23 **Q.** Can we move -- sorry, was there anything else in here
 24 you wanted to draw attention to?
 25 **A.** What, on that document?

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1 to that email, the "Raising concerns with Horizon"
 2 document, at POL00143977. The draft document says:
 3 "This is a paper that has been issued by the
 4 agreement of Post Office Limited and the Justice for
 5 Subpostmasters Alliance."
 6 Is it right that it was intended that the raising
 7 concerns with Horizon document, which was a foundational
 8 document for this part of the review, was to be
 9 a document that was issued with the agreement of both
 10 Post Office and JFSA?
 11 **A.** Well, yeah, we wanted to agree the wording of it and it
 12 encompassed all the issues involved. It's quite
 13 an interesting document with some of the comments that
 14 are in it, nowadays, as I --
 15 **Q.** Can I take you to the things that I found interesting?
 16 **A.** Yeah, sorry.
 17 **Q.** Then you add if there are any others. I was looking at
 18 page 4 of the document, under the heading "The remit of
 19 the Inquiry"?
 20 **A.** Yeah.
 21 **Q.** "The remit of the inquiry will be to consider and advise
 22 on whether there are any systemic issues and/or concerns
 23 with the 'Horizon' system, including training and
 24 support processes, giving evidence and reasons for the
 25 conclusions reached.

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1 **Q.** Yes.
 2 **A.** Well, it was on page 1 of the original document. We've
 3 gone on to the appendix though, haven't we? Yeah.
 4 Yeah, I think -- I'm sorry, I probably shouldn't do this
 5 but it was some of the wording in there. "We all
 6 recognise" -- sorry, third paragraph:
 7 "We all recognise that Post Office Limited cares
 8 about its agents and thousands of subpostmasters. Post
 9 Office Limited is committed to the highest standard for
 10 corporate openness, brevity and accountability and is
 11 happy to sensibly challenge and believe that ..."
 12 I can't see the next bit, sorry. Can I see the
 13 next, the full page, please? Thank you.
 14 Yeah, I it was a statement underneath "Post Office
 15 Limited would like to take this opportunity to emphasise
 16 that these fears are unfounded", and they've been going
 17 on about -- sorry, it's the top paragraph or second
 18 paragraph down, "where there's been persistent
 19 assertions that the Horizon system, Horizon, may be the
 20 source of unresolved shortages in Post Office", and then
 21 they're trying to dismiss it afterwards.
 22 It's just that I think it's quite important for what
 23 was known by Post Office at that time, and they were
 24 quite happy to put their name to a statement like that.
 25 That's -- sorry, that was just the point on there.

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1 Q. Thank you, Mr Bates. I think you sent a reply to this
2 request for comments on the draft --
3 A. Yeah.
4 Q. -- to Simon Baker. I'm not going to turn it up but the
5 reference is POL00183679. That was on 20 November 2012
6 and your only major change was to extend the deadline
7 for concerns to be lodged until 31 March 2013, I think.
8 So I think it's fair to say that, looking at that
9 exchange of emails and the drafts attached, that you, on
10 behalf of JFSA, had agreed the remit of the initial
11 Second Sight investigation?
12 A. I think we'd agreed with the remit, yes.
13 Q. I'm sorry, I missed that?
14 A. I think we agreed with the remit.
15 Q. Yes. Thank you. That can come down.
16 Can we turn to your statement, please, page 35. In
17 paragraph 110, you say something similar to that which
18 you've said already today:
19 "We had real concerns as they [that's Second Sight]
20 had been chosen by the Post Office. We were concerned
21 as to whether they would undertake a whitewash and were
22 in the Post Office's pocket in a similar way to that of
23 the NFSP."
24 Then paragraph 112:
25 "I was suspicious of the Post Office at this point
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1 certainly in the early days as well, providing
2 background information to how things had come about, and
3 also contact information about individuals or any
4 queries about those in the group, as well.
5 Q. I think you had a concern, nonetheless, that information
6 was not getting back to Paula Vennells on the Post
7 Office side; is that right?
8 A. Yeah, I did, yeah.
9 Q. You tell us about that in paragraph 123 of your witness
10 statement on page 39. You say:
11 "There was a concern that perhaps the information
12 was not getting through to Ms Vennells as I did not
13 think her staff were feeding back to her. I was
14 concerned she was not being told the full story so
15 I wanted to ensure she was being accurately informed of
16 the whole situation. This was perhaps a failure in the
17 way Ms Vennells handled the situation, in that I did not
18 feel confident that she had been receiving accurate
19 updates and was truly invested in the investigation and
20 the subsequent events."
21 We are going to explore with other witnesses,
22 including Ms Vennells and including, of course, by
23 reference to recordings of conversations that the
24 Inquiry is in possession of, the extent to which she was
25 not or was not being properly briefed and was
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1 and the whole scheme in general, after having engaged in
2 countless communications with the Post Office over
3 a long period of time, all of which were sent with the
4 hope of receiving some support from the Post Office. No
5 one felt as if we could trust the Post Office in all of
6 this."
7 I think it's right that, despite your initial
8 suspicions, your impression of Second Sight improved --
9 A. Yes.
10 Q. -- once you had had direct engagement with them; is that
11 right?
12 A. Yes.
13 Q. We can see that by looking at page 37 of your witness
14 statement, paragraph 118 at the foot of the page.
15 "My impression of Second Sight improved from initial
16 contact with them. I felt more confident in their
17 ability and can see them operating more independently
18 from the Post Office. My main reservation at the start
19 had been the fact they had been selected by the Post
20 Office. However, I came to see that they were keen on
21 working as an unbiased third party, which improved my
22 confidence in them as an investigating body."
23 Was that as a result of your direct engagement with
24 Second Sight?
25 A. Yeah. I did used to spend quite a bit of time,
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1 challenging of the information that she received. But
2 can we look at a direct communication between the pair
3 of you.
4 A. Yeah.
5 Q. It's POL00098418.
6 Look at the email at the foot of the page, please.
7 Thank you. So this is 21 May 2013. You copy Kay
8 Linnell in and it's a direct email to Paula Vennells.
9 You say:
10 "Hello Paula,
11 "It has been a while since we met at James
12 Arbuthnot's office but at that time you did say if I had
13 any concerns I should contact you directly, hence the
14 reason for this email.
15 "Would it be possible for Kay Linnell and I to meet
16 with you? You will recall that Kay is an independent
17 forensic accountant who, on behalf of JFSA, has been
18 monitoring the work Second Sight has been undertaking.
19 "The main purpose of the meeting is to ensure that
20 you have been receiving the full details of what has
21 been occurring with the Second Sight investigation.
22 Bearing in mind what has been discovered so far, I, for
23 one, am surprised that we haven't yet met to discuss the
24 implications. Whilst I appreciate that the majority of
25 the issues began under previous regimes and you have
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1 expressed a genuine willingness to address the concerns
2 that JFSA has been raising, these issues are still
3 continuing. I have little doubt that it is now feasible
4 to show that many of the prosecutions that the Post
5 Office have pressed home should never have taken place,
6 and I believe this is a view shared by Kay."

7 Then you suggest some dates.

8 Overall, what was the purpose of making such direct
9 one-to-one contact with Paula Vennells?

10 **A.** I don't remember clearly at that particular time for
11 that particular issue but I certainly -- we obviously
12 did have concerns at that point about what was going on
13 and what was being reported back but I can't actually
14 place exactly where it lies in every --

15 **Q.** In the chronology?

16 **A.** Yeah, yeah.

17 **Q.** Just trying a little harder on some of the details in
18 the email, you say:

19 "Bearing in mind what's been discovered so far, I am
20 for one surprised we haven't yet met to discuss the
21 implications."

22 Do you know what that refers to?

23 **A.** I'm just wondering whether that's after the interim
24 report had been produced.

25 **Q.** The interim report hasn't come out yet.

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1 from 22 May 2013, which is the day after you sent
2 an email to Paula Vennells and in that covert recording
3 there is a discussion over the extent to which Paula
4 should or should not be told certain things.

5 **A.** Certain items right. Sorry. I can't help you further.

6 **Q.** Okay, if you can't remember, I'll move on.

7 **A.** Yeah.

8 **Q.** To what extent did you understand that, at the time of
9 the Second Sight, the MP cases investigation, as you
10 called it, Fujitsu was involved in the process?

11 **A.** I wasn't aware of anything at that time, not as far as
12 the discussions that were going on about the system and
13 all the rest of it. I had no idea of them being
14 involved.

15 **Q.** Did you know whether the Post Office was going back to
16 Fujitsu to check or verify information being given?

17 **A.** I think I've seen a later document more recently, which
18 does seem to suggest that, that Fujitsu were involved
19 and in part of discussions with Post Office on the
20 system.

21 **Q.** Although this will be a question for Second Sight in due
22 course, what was your understanding of the extent to
23 which underlying data and information held by Fujitsu,
24 including ARQ data, for example, contractual
25 relationships between Post Office and Fujitsu policies

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1 **A.** Hasn't come out.

2 **Q.** That's not until 8 July 2013.

3 **A.** Okay.

4 **Q.** I think this must be early emerging information from
5 Second Sight.

6 **A.** I wonder if it was a draft of it.

7 **Q.** I don't think a draft had emerged by 21 May.

8 **A.** I'm not sure. I'm not sure. I can't say. Actually,
9 I can't recall clearly the instances there. Perhaps Kay
10 can.

11 **Q.** Can you remember what happened as a result of this?

12 **A.** It depends where it drops in to the chronology of the
13 other issues, unfortunately, and I don't clearly
14 remember off the top of my head, no.

15 **Q.** If we look at the top of the page we can see that
16 Ms Vennells's assistant asks Alwen, Alwen Lyons, the
17 then Company Secretary --

18 **A.** Yes.

19 **Q.** -- to then draft some words. Can you recall whether
20 this resulted in a meeting?

21 **A.** We did have a meeting with her and also I'm not sure
22 whether Paula was also there at that meeting but I do
23 remember a meeting in Old Street.

24 **Q.** The reason why I'm asking these questions in particular
25 is that one of the covert recordings that we have is

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1 and correspondence between the two organisations was
2 obtained and analysed as part of Second Sight's work?

3 **A.** It depends at what date you're saying about -- I did
4 become aware of it at some point, that -- but I think
5 this was probably during the Mediation Scheme itself,
6 when we became aware that -- I think it was something
7 like the 700 requests a year could be made by Post
8 Office for ARQ data from Fujitsu, without any other
9 charge being inflicted. But then, after that, I think
10 there was a charge involved. But I think that was
11 during -- as I say, during the time of the Mediation
12 Scheme itself.

13 **Q.** Can I fast forward to after the draft of the Second
14 Sight Interim Report was being circulated, and look at
15 POL00115961. This is an email from Paula Vennells
16 internally to a whole group of people within the Post
17 Office. So it's not something you will have seen at the
18 time. If we look at the first paragraph, she says that
19 she has had two very constructive telephone
20 conversations with you, which confirmed your willingness
21 to:

22 "... work collaboratively with the Post Office in
23 taking forward our response to the review. In
24 particular he agreed to participate in a new user forum
25 to provide feedback on training and support issues

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1 related to Horizon and bring the existing review process
2 to a conclusion."

3 Is that right? Can you remember whether you gave
4 such a commitment?

5 **A.** I did have a -- I did have some telephone conversations
6 with Paula and I do remember one quite long one, really.
7 It was about -- but it was after the -- after the
8 interim report had been published. That's the one
9 I really do recall, that phone call. The others I'm
10 afraid I don't recall.

11 **Q.** She says:

12 "It is worth emphasising that your main issue is not
13 the computer but the human aspect, how, in his view, the
14 Post Office failed to support and help vulnerable and
15 'muddle headed' subpostmasters."

16 Was that your view?

17 **A.** Well, it wasn't just the computer but it was also the
18 way that -- I mean, she's put it down not the computer,
19 but I'd say it definitely was the computer in there, as
20 well. But it's also the way that Post Office dealt with
21 these sort of problems and dealt with subpostmasters in
22 an unconstructive way. I mean -- and I think that was
23 one of the big problems and that -- we'll probably get
24 to it, but something further on, but I'll wait for that.

25 **Q.** Can we turn to the next bullet point, please:

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1 to directly that might have been able to assist or
2 direct their concerns might have been useful.

3 **Q.** If we just go lastly over the page, please. The last
4 bullet point:

5 "In terms of the report itself, we received a full
6 draft from Second Sight yesterday ..."

7 This was Saturday, 6 July, so it would have been
8 Friday, the 5th:

9 "... and we sent them back a version with tracked
10 changes on a number of sections which we (and Fujitsu)
11 believed our either factually inaccurate or open to
12 misinterpretation."

13 Did you know at this time that Fujitsu were working
14 with the Post Office to provide answers to concerns
15 raised during the Second Sight investigation process?

16 **A.** Not at this time.

17 **Q.** Did you at this stage have an opportunity to meet with
18 Fujitsu Senior Managers and any technical specialists
19 within Fujitsu to discuss directly your concerns?

20 **A.** No, it was never an offer made and Post Office always
21 used to take the position that we were contracted to
22 them, to Post Office, and Fujitsu was a third party, if
23 you like, contracted to Post Office. So we weren't
24 directly contracted to Fujitsu or had control over
25 anything that went on there, unfortunately.

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1 "He [that's you] also raised the idea of setting up
2 a new independent third party that subpostmasters can
3 approach if they after facing issues with Horizon, which
4 cannot be resolved through the normal Post Office
5 processes."

6 **A.** Yeah.

7 **Q.** She says that aligns with some of her own thinking and
8 they're therefore inclined to agree with the idea.

9 Does that accurately reflect what you were
10 suggesting.

11 **A.** Yes, it does. I mean, I've long felt there should be
12 a totally independent third party that subpostmasters
13 could go to, when they have problems, and that -- who
14 could then request Post Office records to check things
15 in there. It's an alternative scheme in there, so as
16 not to expose subpostmasters to the wrath of Post Office
17 straight off, and one of the reasons I used to suggest
18 something like that was because I was being contacted
19 over the years by a number of subpostmasters who had
20 serious losses -- I'm talking about £30,000, £40,000 of
21 losses -- which they'd never declared to Post Office
22 because they were so terrified of what was going to
23 happen to them, and they didn't know what to do or how
24 to move on from that position. And I could see
25 something like a third party that they could have gone

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1 **Q.** So the report, the Second Sight Interim Report, is
2 published on 8 July 2013. If we turn up page 41 of your
3 witness statement, please, at paragraph 128, you say:

4 "I am not sure how many of the group [that's the
5 JFSA] saw the report or whether it was discussed.

6 Overall, the interim report was positive in general, as
7 it showed that there were issues occurring but we had
8 a real concern over the interim report stating there
9 were no systemic flaws."

10 What was your concern about the report stating that
11 there were no systemic flaws?

12 **A.** Well, I actually thought there were systemic flaws in
13 there and there were systemic flaws in the way that Post
14 Office operated and the way it dealt with people, and
15 all the rest of it, perhaps not being interpreted in the
16 way that they were with the computer system, even though
17 there were flaws of that nature in there. But I knew
18 perfectly well that, out of a 30-odd page report, that
19 Post Office would jump on one particular line or one
20 particular comment, and that's what would be appearing
21 in the media and in their press releases, and it was
22 that --

23 **Q.** To what extent did they deploy that line?

24 **A.** -- and they did, and they basically -- they kept saying
25 that Second Sight, you know, independent investigators,

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1 found that there were no systemic flaws in Horizon. You
 2 know, they just kept on picking that one line out of
 3 a 30-odd page report, which identified many other
 4 concerns right across the whole of the issue.

5 **Q.** Did it take until the judgments of Mr Justice Fraser for
 6 anyone in a decision making role to acknowledge the
 7 existence or find the existence of systemic faults and
 8 failures in the Horizon system?

9 **A.** Well, we're going back now to controlling the narrative
 10 and that was the first time Post Office lost control of
 11 the narrative, once we got into the High Court. So yes,
 12 that's when the truth started to come out, at that
 13 point.

14 **Q.** Had you previously, ie months before then, ie months
 15 before the 8 July publication, drawn attention to the
 16 problems with using the phrase "systemic flaws",
 17 "systemic failures" or "systemic faults" to Second
 18 Sight?

19 **A.** Yes.

20 **Q.** Can we look, please, to POL00098315. The bottom email,
 21 please. Thank you. This is two months before
 22 publication time, so 12 May, where you write to Ron
 23 Warmington of Second Sight, and there's a whole heading,
 24 "System Errors v Systemic Failures".
 25 You point out -- I'm not going to go through exactly
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1 had used in a series of prosecutions, Gareth Jenkins,
 2 had failed to disclose to the court material which
 3 undermined the opinions that he gave, that he had not
 4 complied with his duties to the court, that his
 5 credibility as an expert witness was fatally undermined,
 6 that the Post Office had been in breach of its duties as
 7 a prosecutor and that there were a number of convicted
 8 subpostmasters to whom disclosure of these facts should
 9 have been given but was not given?

10 **A.** Not at that time.

11 **Q.** When was the first time that you learned that the Post
 12 Office had been given that information?

13 **A.** It was quite late on.

14 **Q.** So, essentially, I've summarised the Clarke advice, the
 15 first Simon Clarke advice there?

16 **A.** Yeah. I think it was probably at the time of the appeal
 17 court hearings for the overturned convictions. I think
 18 that's when it really started coming to light.

19 **Q.** So 2021?

20 **A.** Yeah.

21 **Q.** Was anything ever discussed or even hinted at in all of
 22 the meetings you held, all of the conversations you were
 23 a party to, all of the letters that you wrote, all of
 24 the email exchanges that you had, with everyone at the
 25 Post Office, from Alice Perkins and Paula Vennells down,
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1 what you say here in the interests of time because we've
 2 still got a lot of ground to cover but in short order,
 3 what was your point?

4 **A.** Well, one of the points was that I've just made to you
 5 there, that Post Office would jump on it as being the --
 6 no systemic failures with Post Office and their Horizon
 7 system, which it says in there. I mean, there were
 8 system failures in there but I just -- I couldn't
 9 understand why they felt that was so important to put in
 10 something of that sort in there, when it was obvious
 11 that there were systemic failures in the way Post Office
 12 dealt with subpostmasters and the way they processed
 13 things and the support they gave. It was a total
 14 failure of Post Office throughout all of that and I just
 15 found it a bit frustrating and I think, even to this
 16 day, Ron will remember this in great detail, and we have
 17 a lot of discussions over it at the time. And I think
 18 he feels that they got it wrong, the one thing they got
 19 wrong in that report was that.

20 **Q.** Thank you. That can come down. Thank you.
 21 The interim report is published on 8 July 2013.

22 **A.** Yes.

23 **Q.** Did you know at the time that, shortly after the
 24 publication of Second Sight's Interim Report on 8 July
 25 that the Post Office was informed that a witness that it
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1 about such problems with convictions?

2 **A.** No.

3 **Q.** Were there convicted subpostmasters within the JFSA at
 4 this time?

5 **A.** Yes.

6 **Q.** I read somewhere that it was about a third of them, that
 7 must vary over the course of time?

8 **A.** It did, it --

9 **Q.** What was the proportion?

10 **A.** Yeah, by the time we court to the GLO, of the 550, as
 11 such, in there, I think about 60 of them -- it was about
 12 10 per cent, roughly, had convictions. In fact, that
 13 had been the issue that had caused problems with the
 14 original lawyers that were supporting us, Shoosmiths,
 15 back in 2010. It's because they couldn't obtain ATE
 16 insurance because we had convictions in the group.

17 **Q.** Just winding forwards a little bit before the break,
 18 that cohort of people -- I've said it was about a third
 19 at this time --

20 **A.** Yes.

21 **Q.** -- changed in number by the time you got up to 550 --

22 **A.** Yes.

23 **Q.** -- at the time of the GLO. What approach did the Post
 24 Office take in relation to that group of people, the
 25 convicted subpostmasters, in terms of whether they could
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1 take their claims to the Mediation Scheme or have their
 2 claims adjudicated within a mediation?
 3 **A.** They actually agreed that they could go forward into the
 4 Mediation Scheme.
 5 **Q.** Were such claims adjudicated upon in the mediation?
 6 **A.** I don't recall specifically on that basis. That's
 7 a whole other discussion.
 8 **Q.** One of the consequences, indeed one of the only
 9 substantial consequences, of the interim report was the
 10 setting up of the Initial Complaint Review and Mediation
 11 Scheme --
 12 **A.** Yes.
 13 **Q.** -- sometimes called the ICRMS or sometimes the Mediation
 14 Scheme. Can we look, please, at page 45 of your witness
 15 statement, please. At paragraph 133 at the bottom, you
 16 say:
 17 "The purpose of the Mediation Scheme was to address
 18 subpostmaster complaints and individual cases, so that
 19 there could be an exploration into the way they had been
 20 treated with a view to finding a solution for the
 21 subpostmasters, which was likely to involve
 22 compensation. It was also set up to establish what had
 23 been the truth behind the circumstances."
 24 Is that a complete summary, essentially, of your --
 25 **A.** It's a fair comment, it's a -- yeah.

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1 **(3.04 pm)**
 2 **MR BEER:** Good afternoon, Mr Bates.
 3 Could we continue with the Mediation Scheme and
 4 look, please, at page 50 of your witness statement, at
 5 paragraph 146. I'll just wait for that to come up. It
 6 says:
 7 "It was never agreed that the working group would
 8 discuss individual cases."
 9 Just stopping there, can you briefly explain what
 10 the working group was, in the context of the Mediation
 11 Scheme?
 12 **A.** The Mediation -- sorry, the Working Group was
 13 a combination of the JFSA and Post Office and we had
 14 an independent Chair, Sir Anthony Hooper, and then
 15 Second Sight were employed to work for the Working Group
 16 to do the investigations and report back to the group
 17 accordingly and produce the reports as required.
 18 **Q.** Thank you. You say:
 19 "It was never agreed that the Working Group would
 20 discuss individual cases and make decisions on whether
 21 to mediate, it was down to Second Sight to decide this,
 22 then there was the Mediation Scheme which would
 23 undertake the process of mediating between the Post
 24 Office and the subpostmasters. However, two example
 25 cases were discussed prior to Second Sight starting to

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1 **Q.** If we go over the page, please. You say in 134 that:
 2 "At the outset, we thought that the Mediation Scheme
 3 might well achieve the aims it had set out, provided
 4 that the Post Office would enter it in good faith. We
 5 entered into this process as we didn't have any viable
 6 alternative at this time."
 7 Then paragraph 137, over the page, please. You say:
 8 "Unfortunately, the financing of the scheme came
 9 from the Post Office and so it provided the Secretariat
 10 and administrative support which were supposed to be
 11 independent. However, we were not aware at the time
 12 that Belinda Crowe was also a member of the Post
 13 Office's covert Project Sparrow team as was the Post
 14 Office's General Counsel, as indicated from some minutes
 15 [that you refer to]."
 16 At this time, at the setting up of the Mediation
 17 Scheme, did you know of the existence of Project
 18 Sparrow?
 19 **A.** No.
 20 **MR BEER:** Thank you.
 21 If that's a convenient moment, sir, I wonder whether
 22 we could break until 3.05, please?
 23 **SIR WYN WILLIAMS:** Very well.
 24 **(2.47 pm)**
 25 **(A short break)**

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1 produce reports but only to agree a format in which case
 2 reports were to be produced."
 3 I just want to explore this issue briefly of who
 4 would make decisions on whether to mediate and whether
 5 that was down to Second Sight.
 6 You, I think, wrote an email about this to
 7 Sir Anthony Hooper. Can we see POL00107151. In fact
 8 that's a letter rather than an email. You can see this
 9 is dated 10 November 2014 to Sir Anthony, and you say in
 10 the second paragraph:
 11 "JFSA is now of the opinion the scheme has strayed
 12 so far from the original purpose for which it was
 13 intended that the few applicants who have actually
 14 reached a mediation meeting through CEDR ..."
 15 Just explain what CEDR was?
 16 **A.** I can't remember what it stands for now. It was a --
 17 **Q.** A professional centre for dispute resolution?
 18 **A.** Dispute, yeah.
 19 **Q.** "... have expressed such disappointment within the
 20 scheme that at least one applicant has withdrawn."
 21 Then under numbered paragraph 1 you ask that it is
 22 noted:
 23 "As has been stated on many occasions, it is JFSA's
 24 view that it's not the role of the Working Group to
 25 approve which cases go to mediation for the following

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1 reasons, which are contained within the main document;

2 "That each of the applicants received within that
3 they were promised ..."

4 Then you set out some extracts from it.

5 **A.** Yes.

6 **Q.** Was that your view, that it wasn't the role of the
7 Working Group to decide or approve which cases should go
8 to mediation?

9 **A.** Only in specific instances. For example, if not enough
10 information had been supplied by an applicant as whether
11 to fully understand or investigate his case, would it go
12 forward there. Or other -- other perhaps -- I don't --
13 variations on that thing. But the main bulk of them
14 should go through on their own, dependent on Second
15 Sight's recommendation.

16 **Q.** Whilst we're on it, on page 4 of the letter, please. In
17 the top paragraph there, second line, you say:

18 "The further the scheme progresses, the more
19 entrenched and defensive Post Office has become, and the
20 original concept of actually seeking the truth has long
21 since been abandoned, replaced by denial and a culture
22 of blaming the applicant time after time. The
23 underlying fact that it was the failure of the Post
24 Office to correct the shortcomings of the Horizon system
25 and its associated issues is ignored by Post Office

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1 about four to six weeks for them to undertake
2 an investigation, but they were asking for extension
3 after extension to investigate each of these cases and,
4 in some cases, they were going on for six months or
5 seven months, asking for extensions whilst they were
6 investigating. So it just dragged on and on and on and
7 on, and that was one of the big frustrations with all of
8 it. We had very little control of the flow at that
9 point.

10 **Q.** Thank you.

11 Just on the issue of who made a recommendation and
12 who made a decision on whether a case was suitable for
13 mediation, can we just go back and look at one of the
14 founding documents of the scheme --

15 **A.** Yeah.

16 **Q.** -- at POL00022120. This is an overview of the Complaint
17 Review and Mediation Scheme and is one of the
18 originating documents published by Post Office at the
19 time of the initiation of the scheme.

20 If we look, please, at page 2, and three paragraphs
21 from the bottom, it says:

22 "As a result of this investigation, Second Sight
23 will produce a case review summarising its findings, and
24 a recommendation on whether the case is suitable for
25 mediation. A copy of the case review will be provided

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1 again and again."

2 That's plainly how you felt at the time. What
3 material or evidence was that view based upon?

4 **A.** Oh, one of the key ones, I suppose a favourite one of
5 the hearing, is the failure of disclosure. It was
6 holding up cases time and time again, and it was also
7 the amount of time Post Office -- sorry, the way the
8 scheme worked, basically, was someone applied to go into
9 the scheme. If it was shown -- Post Office quickly
10 looked at their application to ensure that they were
11 a subpostmaster and they had been there during the
12 period they say. At that point, they'd been accepted
13 into the Mediation Scheme, then they would have the
14 option of having an independent expert work on their
15 case, either a forensic accountant or a solicitor, at
16 a set fee. They would produce a report about their --
17 this person's case. At the same time, Post Office would
18 be providing their own report on that person's case.
19 Both of these reports would then go to Second Sight, who
20 would investigate and put together and make
21 a recommendation to the Working Group on its findings.
22 Simple as that.

23 But once these cases were being investigated in
24 theory by Post Office, they were asking for more and
25 more time. There was meant to be a turnaround period of

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1 to you. The Working Group will however take the final
2 decision on any cases that may not be suitable for
3 mediation."

4 What would you say to the suggestion that this makes
5 it clear that it was the Working Group that took final
6 decisions on which cases should and should not proceed
7 to mediation?

8 **A.** No, I think what you're missing here is a document which
9 is -- is it Q&As, or something of that -- that went with
10 it, as well, key points. And there's one of the
11 questions in it asks, "Will my case go to mediation?"
12 And I think the answer to that is it says in the
13 majority of cases they will go to mediation. I think
14 where it takes the final decision on any cases, that's
15 those controversial cases where there wasn't enough
16 information at all that had been supplied as part of the
17 application.

18 **Q.** I think maybe you're referring to page 5 of the
19 document. Are they the FAQs that you're talking about?

20 **A.** Yeah, that's right. FAQs, yeah.

21 **Q.** Is the one that you're thinking about on page 8: "Will
22 my case definitely be referred to mediation?" Is that
23 the one?

24 **A.** That's the one, yeah. It's the second paragraph down
25 I was trying to clarify.

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1 Q. That second sentence of the paragraph, the second
 2 paragraph, gives us an example: the ability of the
 3 Working Group to decide that the case is not one which
 4 requires resolution?
 5 A. Yeah, if there was in -- yeah, exactly.
 6 Q. Didn't that give the Working Group the ultimate power of
 7 veto?
 8 A. In those circumstances. In those circumstances. If
 9 there's insufficient information about a case, we may
 10 decide then that it wasn't worth it going to mediation.
 11 But, as it says, in most cases if you provide detailed
 12 and accurate information, it's likely in most instances,
 13 and that was where we were relying on Second Sight to --
 14 Q. I think, in the course of the work of the mediation, you
 15 wrote a number of letters to the then Minister,
 16 Jo Swinson?
 17 A. Mm.
 18 Q. -- about its operation; is that right?
 19 A. Yes, I did.
 20 Q. Can we look at some of those, please. POL00144511. You
 21 will see it's dated 17 April. I'm not going to read the
 22 first page. If we can skip to the second page, please.
 23 Look at the last paragraph on page 2 and on to page 3:
 24 "There is no doubt at all that the systemic failures
 25 identified so far have been brought to Post Office's

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1 A. I don't recall.
 2 Q. No, can we --
 3 A. Yeah, sorry.
 4 Q. Can we move on then, please, to POL00145664 and look at
 5 page 3, please. Foot of the page. We're now on
 6 18 July. This is another communication from you to the
 7 Minister. You refer to a reply of 11 July where you
 8 confirm that further cases can be put forward to review.
 9 You say that you recently wrote to MPs, who raised
 10 questions about 47 cases that only ever seemed to be
 11 commented on, and you say:
 12 "The 47 cases referred to in the report comprise
 13 of ..."
 14 Then you give a breakdown.
 15 Then if we scroll up the page, please, a bit
 16 further, please. Do you see that your email to the
 17 Minister's correspondence address has found its way to
 18 the ShEx, the Shareholder Executive within the
 19 Department of Business, Innovation and Skills?
 20 This is as the email has been produced to us. We
 21 can't see how it got there. Addressed to Martin Edwards
 22 and Susan Crichton and two members of the ShEx. If we
 23 can take that off, please.
 24 Mr Whitehead within BIS says:
 25 "Martin, Susan,

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1 attention through their regular meetings with Second
 2 Sight, and this alone raises the question as to why Post
 3 Office is continuing with their prosecutions of
 4 subpostmasters, when it is now so much more obvious that
 5 they are standing on very shaky legal ground. As I have
 6 mentioned before, the systemic failures are proven facts
 7 which are at the root of many of the subpostmaster
 8 cases, although from the Second Sight briefing document
 9 presented at the Portcullis House meeting, they're only
 10 going to be treated as an adjunct to the issue of
 11 individual cases, to the point where only a few of them
 12 may be featured in their forthcoming report."
 13 "It is evident to us that these systemic failures
 14 should become the yardstick that the individual cases
 15 are measured against, as they are significantly easier
 16 for others to comprehend without the requirement of an
 17 in-depth knowledge of the finer points of Horizon. The
 18 refocusing of the investigation on the systemic failures
 19 would not only offer a quicker and far more efficient
 20 method of addressing the whole issue, but would minimise
 21 the information required from Post Office, which has
 22 been the main cause of the slow, and at times no
 23 progress, Second Sight has made with the individual
 24 cases."
 25 Did you get any reassurance back from the Minister?

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1 "The email letter below from Alan Bates at JFSA to
 2 Jo Swinson raises a number of issues which it would be
 3 helpful for us to discuss with you before drafting
 4 a reply. I think a meeting within the next week or so
 5 might be the best way forward, given the range and
 6 complexity of some of the issues [involved]."
 7 Did you know, or did you appreciate, at the time,
 8 that, notwithstanding what had been said by Government
 9 Ministers about operating an arm's length relationship
 10 with the Post Office, there was nonetheless
 11 a back-channel of communications between the Government
 12 and the Post Office?
 13 A. No. I can't say I was aware of that, no.
 14 Q. With your correspondence being copied from the
 15 Government to the Post Office?
 16 A. I could understand them perhaps having some concern,
 17 because I was in regular contact with many of the MPs
 18 there. But no, I can't say I was aware of it.
 19 Q. If we just go to page 1, please. We can see, on this
 20 page, emails within the Post Office, starting in the
 21 middle of the page, from Alwen Lyons to Mark Davies,
 22 Martin Edwards and Susan Crichton, and she says, when
 23 discussing what reply to give:
 24 "The problem we have is that he [that's you] doesn't
 25 know we have seen the letter and we need to be careful

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1 that the Minister is not seen to be aligning with us by
 2 asking us to help her respond."
 3 I will read that again:
 4 "The problem that we have is that he [that's you]
 5 doesn't know that we've seen the letter [that's your
 6 letter] and we need to be careful that the Minister is
 7 not seen to be aligning with us [the Post Office] by
 8 asking us to help her respond."
 9 So they're discussing, essentially, how to play it
 10 with you without revealing that the Government has sent
 11 on your letter to the Post Office, correct?
 12 **A.** Seems to be that way, yeah.
 13 **Q.** You say in your witness statement that there were no
 14 changes as a result of your letter, the one we've just
 15 looked at. Did Jo Swinson in fact respond to you?
 16 **A.** I don't recall. I can't -- no, I don't recall.
 17 **Q.** Can we turn to another letter you wrote to Jo Swinson
 18 a year later on 16 April 2014 when she was still the
 19 Minister for Postal Affairs, POL00022683. We can see
 20 the date and to whom it's addressed. For some context,
 21 by that date, was it right that no Post Office
 22 investigation had been completed to a sufficient state
 23 for Second Sight to complete its own reports?
 24 **A.** Yeah.
 25 **Q.** You set out how the scheme was meant to work, if we just
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1 completion with the assistance of their PA. So far, the
 2 returned, completed CQRs are as follows ..."
 3 You set them out over the page.
 4 Then you say, top of the next page:
 5 "Yet to date, POL has not finalised a single case
 6 report to the point where it is ready for the Working
 7 Group to consider its suitability for being sent to
 8 mediation, and realistically that could still be
 9 a considerable time off."
 10 If we scroll down further and keep going, third
 11 paragraph, you say:
 12 "Regardless of what it says publicly, POL in
 13 practice seems not only to be hardening its corporate
 14 defence, but now seems to be prepared to invoke the
 15 protection of the public purse as their last line of
 16 justification for not righting the wrongs they have
 17 inflicted on so many. It appears that whatever POL can
 18 block, it does; for some reason [the Post Office] is the
 19 only one that doesn't seem to be able to recognise what
 20 everybody else can see so clearly."
 21 Then you talk about:
 22 "The only way we're going to resolve this is through
 23 the media and the courts."
 24 So what was your principal concern by the time you
 25 were writing this letter?
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1 scroll down and keep scrolling. You say:
 2 "The above structure was agreed and published at
 3 scheme launch ... and the documentation is still
 4 available for downloading at ..."
 5 Essentially, that's the documentation that I showed
 6 you earlier.
 7 **A.** Yeah.
 8 **Q.** "Unfortunately, the reality of where the scheme is
 9 actually at is very different.
 10 "As at the date of writing [this is mid-April 2014]
 11 during the time the scheme was open for applications,
 12 150 cases were accepted, although it should be noted
 13 that, since the scheme has closed, there have been
 14 others who would have applied if they'd been aware of
 15 its existence.
 16 "Of the 150, the earliest that POL became aware of
 17 the names of individuals and the identities of the post
 18 offices that were to be involved was [as follows]."
 19 Next bullet point:
 20 "Once the criteria to enter the scheme had been met
 21 and the Working Group had approved the initial
 22 application, the personalised CQR ..."
 23 Can you explain what the CQR was?
 24 **A.** It was the initial report. I can't --
 25 **Q.** "... was sent out to the relevant applicant for
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1 **A.** I think this is a time when they, Post Office, had
 2 changed their General Counsel. I think this was at the
 3 point where Chris Aujard had come along. Do correct me
 4 if I'm wrong in getting the --
 5 **Q.** I think that was September 2013, from memory.
 6 **A.** Yeah, was coming along, and I think, when he turned up,
 7 I think he had a very clear remit to get rid of the
 8 Mediation Scheme or to change it, or to bin it, or
 9 whatever, because he was also a part of this Project
 10 Sparrow, which was, as we later to find, monitoring what
 11 was going on in that scheme and how it was going ahead.
 12 Now, I had a big discussion with Chris Aujard over
 13 the interpretation of the aims and the objectives of the
 14 scheme, and that was earlier on in the year, that year,
 15 and I remember I had to detail him -- to him the whole
 16 scheme, how it was meant to work, and I also copied in
 17 Sir Anthony Hooper on that correspondence, as well. But
 18 basically, it seemed they were trying to twist it, twist
 19 it, twist it, the whole time to take away its
 20 effectiveness. And it just wasn't -- it didn't feel
 21 wholesome any more. It didn't feel like we were after
 22 the truth any more. It just felt like we were trying to
 23 defend Post Office's position in all of this.
 24 **Q.** You tell us in your witness statement, paragraph 145 --
 25 no need to turn it up -- that, as a result of writing
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1 this letter, there was no change as a result; is that
 2 right?
 3 **A.** Yeah, that's correct.
 4 **Q.** I think, in fact, you got a letter back from Paula
 5 Vennells which criticised you for writing in those
 6 terms --
 7 **A.** For writing --
 8 **Q.** -- to Jo Swinson; is that correct?
 9 **A.** Yeah.
 10 **Q.** Let's have a look at that, please. POL00116501.
 11 I think this is a draft but I think it's in the terms it
 12 was sent. No doubt we can chase that down if I'm wrong:
 13 "Your letter of 16 April to the Minister has been
 14 passed to me for reply ...
 15 "Since the publication of the Second Sight Interim
 16 Report, the Post Office has worked collaboratively with
 17 JFSA as an organisation ..."
 18 Is that true?
 19 **A.** To a very small degree.
 20 **Q.** "... and you, as its Chair, to design the Initial
 21 Complaint Review and Mediation Scheme. The Scheme
 22 documentation was agreed with you and put on your
 23 website."
 24 That is correct, isn't it?
 25 **A.** Yes.

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1 **A.** That --
 2 **Q.** -- that we've informed the Minister's reply to this
 3 letter, without disclosing that fact?
 4 **A.** Mm.
 5 **Q.** The second point you make is the fact you've bypassed
 6 the structure of the Working Group to raise your
 7 concerns:
 8 "The Post Office has displayed a strong commitment
 9 to the scheme over a prolonged period of time and have
 10 remained committed in principle to making the scheme
 11 work but your letter has damaged the trust the Post
 12 Office has invested in you, as a member of the Working
 13 Group. There are a number of specific points in your
 14 letter the Post Office will need to address. I have
 15 asked Chris Aujard to prepare a more detailed response.
 16 In the meantime, I will need to consider the Post
 17 Office's position in relation to the Scheme over the
 18 coming days."
 19 Did you know that the Post Office was having
 20 an internal debate at this time over whether your letter
 21 presented a golden opportunity, because of your alleged
 22 breach of confidentiality, for the Post Office to back
 23 out of the scheme and bring it to a quick close?
 24 **A.** No, I wasn't aware of that. I mean, I presume this was
 25 something that was discussed in Project Sparrow.

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1 **Q.** "The Post Office has remained true to the aims of the
 2 scheme ..."
 3 Is that correct?
 4 **A.** To a degree.
 5 **Q.** "... committed substantial resource to ensure its
 6 success and respected the confidentiality of the Working
 7 Group."
 8 Then there's about sharing a platform on 24 March:
 9 "Against that background, your action in sending
 10 your letter [the letter to the Minister] has come as
 11 a shock and disappointment to her. I find two things
 12 troubling: the content of your letter would appear to
 13 breach the confidentiality of the Working Group and
 14 furthermore paints a picture which is inconsistent with
 15 the position as I understand it to be."
 16 **A.** Well, that's another one of these things where, you
 17 know, is she getting the right information from her
 18 staff? She never attended these meetings, never ever
 19 attended one of the Working Group meetings, to the best
 20 of my knowledge.
 21 **Q.** Of course, this to be set against the context of the
 22 email discussion --
 23 **A.** Oh yeah.
 24 **Q.** -- that I took you to, which is how do we inform the
 25 Minister's reply to this letter without disclosing --

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1 I don't know. It may be a question for them. But
 2 I mean, my concern has always been the group first,
 3 what's best for the group, and not what's best for Post
 4 Office in all of this. So I was representing the group
 5 in these discussions and -- with what was going on, and
 6 I had to stand up for what right, at the time, for them.
 7 **Q.** Can we turn to paragraph 157 of your witness statement,
 8 please, which is on page 53. You say in paragraph 157
 9 that:
 10 "[You] believe the Mediation Scheme failed as it was
 11 part of the cover up by POL. I expect the Post Office
 12 discovered things that they did not like and did not
 13 want to come out. There was definitely an element of
 14 not wanting to accept fault. I believe the Post Office
 15 had no intention whatsoever of getting to a mutually
 16 acceptable and fair decision. If anything, it seemed as
 17 if the Post Office had been using the Scheme as
 18 a fishing expedition to see what evidence subpostmasters
 19 actually had about Horizon."
 20 Was what you say there based on information from
 21 subpostmasters?
 22 **A.** No, it was -- I suppose it's the feedback from working
 23 on the scheme for that many months, or those years, and
 24 knowing the way Post Office operated. I mean, I'd been
 25 dealing with them then for many, many years, and

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1 I certainly could see the way they operated and what
 2 they were up to, and whether they were forthcoming on
 3 issues.

4 **Q.** In what circumstances did the Post Office terminate the
 5 scheme?

6 **A.** I got a phone call. I got a phone call just to say,
 7 "Oh, we've decided to send all the cases to mediation
 8 now, so there's no need for the Working Group to meet".
 9 Now, interestingly, that was the day before
 10 a meeting was due to be held in which we were going to
 11 see the draft of the Second Sight part 2 report, which
 12 was damning, and I think one of the reasons they did
 13 that was to stop that report from coming out.

14 **Q.** What was your view of the decision of the Post Office to
 15 terminate the scheme?

16 **A.** I suppose publicly, I was very dismayed about it.
 17 I think privately, I was ecstatic about it, because I'd
 18 been thinking of pulling out of that scheme for about
 19 12 months and I'd been sitting in there the whole of
 20 that period to get as much information and reports out
 21 of them in order for us to move on to the next step of
 22 legal action.

23 **Q.** Did you then make a decision that it was necessary to
 24 commence legal proceedings?

25 **A.** We had been looking around for a little while. I think
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1 join in the Group Litigation, a date by which they had
 2 to do so, a cut-off date?

3 **A.** Yes, there was. I mean, with Freeths -- and Freeths
 4 took quite an active role in this -- we had to find the
 5 funding and then we had to go out and recruit far more
 6 claimants in there, and so then they -- a whole batch of
 7 PA and advertising was undertaken for a few months in
 8 there to bring forward the numbers that were needed
 9 to -- I think the -- I don't know what they're called --
 10 the schedules or the names that go forward to be
 11 attached to the GLO, I think there were about three that
 12 were attached to eventually finish up with the 550 that
 13 went forward to the --

14 **Q.** Can we briefly look at the release that you made, the
 15 press release that the JFSA made. POL00248057.

16 Go to page 2, towards the bottom, please. This is
 17 an email from Melanie Corfield, a name we will become
 18 familiar with in these phases, and she is a member of
 19 the Post Office's Communications Team. Just going back
 20 to the email, you'll see she emails Rodric Williams,
 21 Andrew Parsons of Bond Dickinson, and others, saying:
 22 "We've been alerted by a trade mag to a statement
 23 issued by the JFSA."
 24 Then if we go down the page a little bit, there is
 25 the JFSA statement cut into her email. Can you see
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1 the writing was on the wall, or had been for a number of
 2 months, and we'd spoken to a few firms, a few firms.
 3 Initial discussions --

4 **Q.** The first claim, turning to the Group Litigation, was
 5 issued in April 2016?

6 **A.** The first claim?

7 **Q.** Yes.

8 **A.** Yeah, I -- well, we eventually found Freeths in
 9 September 2015.

10 **Q.** Yes.

11 **A.** That's when they came on board and when they really took
 12 over.

13 **Q.** One of the first steps was an application by the
 14 claimants for a Group Litigation Order?

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

16 **Q.** That was opposed by the Post Office; is that right?

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

18 **Q.** Despite that opposition, the court ordered that the
 19 claim should be managed under a Group Litigation Order
 20 from 22 March 2017; is that right?

21 **A.** Yes.

22 **Q.** I think the JFSA made an announcement by press release
 23 of the making of the Group Litigation Order, didn't it?

24 **A.** I don't recall it. They probably did.

25 **Q.** Do you remember if there was a time, if people wanted to
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1 that?

2 **A.** Yeah.

3 **Q.** You say --

4 **A.** That's right.

5 **Q.** -- in the statement:

6 "JFSA announced today that the Group Litigation
 7 Order against the Post Office has now been approved by
 8 the President of the Queen's Bench Division of the High
 9 Court, which means that the case will continue through
 10 the court as a group action. The Post Office Limited is
 11 defending the claim. Over 1,000 subpostmasters from
 12 across the UK have now applied to join the action."

13 **A.** I think about 1,200 eventually applied but I think by
 14 the time they'd sifted through them, we finished up with
 15 550.

16 **Q.** At the second paragraph on the second page there, you
 17 can see a quote from you:

18 "Alan Bates of JFSA said the case is now up and
 19 running and we have had over 1,000-plus candidates come
 20 forward so far. Subpostmasters have until 26 July to
 21 join the action before the cut-off, which prevents new
 22 claimants joining the claim thereafter."
 23 I just want to ask you some questions about the rest
 24 of this email chain, even though you weren't copied into
 25 it, because they are relevant to later witnesses. If we
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1 scroll up the page, please, you will see that Mel
 2 Corfield sends it to, amongst others, Andrew Parsons.
 3 Then, in the email, there is a reply from the Head of
 4 Portfolio, Legal Risk and Governance, Mark Underwood,
 5 saying:
 6 "JFSA have issued a statement that has been picked
 7 up by Nick Wallis in Computer Weekly, the statement is
 8 included in Mel's below note. I don't think there is
 9 anything 'new' included within it, save for the claim
 10 that 'over 1,000 subpostmasters from across the UK have
 11 now applied to join the action'.
 12 "Though concerning they have chosen to use the word
 13 'applied' rather than just 'joined' or similar."
 14 Then further up, Jane McLeod -- who we're to hear
 15 from -- the Group Director of Legal Risk and Governance,
 16 says:
 17 "I think the key words are underlined below -- they
 18 haven't joined yet!"
 19 Then further up the page, Andrew Parsons says that
 20 he is happy with the comms. That's a draft reply:
 21 "Plus let's not forget that Alan Bates has
 22 a somewhat loose relationship with the truth ..."
 23 Just two questions on that, if I may. Firstly, was
 24 what you were saying in the press release accurate?
 25 **A.** Yes.

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1 delivered warnings about aggressive litigation tactics?
 2 **A.** Yes.
 3 **Q.** From your perspective, as a litigant, what, if any,
 4 litigation tactics were being used by the Post Office?
 5 **A.** Oh, they were definitely trying to outspend us. I mean,
 6 we'd had to raise commercial funding from it. They had
 7 a bottomless pocket, as such, being a Government
 8 organisation. So anything they could do to spin it out,
 9 or anything they could do to recuse the judge, or
 10 whatever, they did, and anything to cost us money and
 11 try and get us to stop the case. That was obvious.
 12 **Q.** You gave evidence in the Common Issues Trial?
 13 **A.** I did.
 14 **Q.** The reference is POL00022936. For reference, between
 15 pages 44 and 51, the judge deals with your evidence and
 16 the findings that he made about your truthfulness and
 17 honesty, which I'm not going to display at the moment.
 18 In your witness statement, you provide examples of
 19 what you say was the Post Office trying to prevent the
 20 truth coming out in the Group Litigation.
 21 **A.** Okay, yeah.
 22 **Q.** Can you assist us with what those tactics were?
 23 **A.** Well, obviously, to outspend us. That was the key one
 24 throughout all of that, and I think I've just sort of
 25 listed the main points that they've gone through.

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1 **Q.** Secondly, had you ever had any dealings with Mr Parsons?
 2 **A.** Oh, yes.
 3 **Q.** Had you had any dealings with Mr Parsons that might
 4 properly allow him to form the view that you had
 5 a somewhat loose relationship with the truth?
 6 **A.** No. I mean, Andrew Parsons is one of those that used to
 7 appear at the Working Group meetings, one of the many
 8 lawyers that Post Office used to send to them and,
 9 I mean, I don't know why he's come up with that.
 10 I mean, I might embellish but I don't lie. I mean,
 11 anything to promote it. I suppose I spent too much time
 12 around lawyers from now and then, so the wording or
 13 phrasing sometimes can seem a little bit that way.
 14 But it was quite right: we'd had over 1,200 people
 15 that did apply to join the scheme and, out of that, as
 16 I say, 550 were signed up to it.
 17 **Q.** I think, in the course of the litigation, there was
 18 an application to strike out passages from your witness
 19 statement; is that right? You know, the long 41-page
 20 witness statement we looked at earlier?
 21 **A.** Yeah.
 22 **Q.** The Post Office applied to strike it out and that
 23 application was dismissed. The reference is
 24 POL00004094. In the course of that judgment, is it
 25 right that the judge, and in a previous judgment,

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1 **Q.** I think it's right that you have yourself made
 2 an application for redress?
 3 **A.** Yes, I have.
 4 **Q.** When was the application made?
 5 **A.** Gosh, it was -- it must have been -- I think it was
 6 October last year.
 7 **Q.** I'm not going to ask you what any of the figures are or
 8 the offers are. When did you first receive an offer?
 9 **A.** I received an offer I think it was 77 working days after
 10 my claim had gone in, which -- against the target of the
 11 Department responding in 40 days. I mean -- and the
 12 offer that they actually made was only about a sixth of
 13 the claim that had gone in there, and it's -- I mean,
 14 you know, I'm trying to fight for everyone's financial
 15 redress in this but I've also got to fight for my own,
 16 as well, and I have no doubt that there's a bit of
 17 vindictiveness coming in from the Department and the
 18 Post Office on this.
 19 And the reason I say that is quite simple: they
 20 don't think there's any worth to any of the work that
 21 I've done over the years. I mean, my claim has gone in
 22 and it's been treated exactly the same as everyone
 23 else's. They all have these heads of claims in there.
 24 There are some heads of claim that apply to some people
 25 and not to others: so I was never made a bankrupt, so

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1 that doesn't apply to me; I was never suspended, and so
2 on and so forth. So they do vary. But -- and this was
3 without me knowing -- the lawyers representing or
4 dealing with my claim, and also the forensic accountants
5 dealing with my claim, put it together -- and I was not
6 involved with the figures -- and they put it together
7 and they included an amount for the work that I'd done
8 over the 20 years -- it's like another column heading --
9 and that's been totally negated by them. In other
10 words, Government doesn't think anything I've done is
11 worth anything.

12 **Q.** I think the first offer you received was shortly before
13 your appearance before the Select Committee in
14 January --

15 **A.** Yeah.

16 **Q.** -- and you said publicly that it was derisory?

17 **A.** It was. Still is.

18 **Q.** Have you received any further offer since then?

19 **A.** No. A challenge letter went in from my lawyer but --
20 and they were meant to hear last week a response, which
21 they never did receive, and so I still don't know
22 anything.

23 **Q.** From your perspective, has the process of seeking and
24 obtaining redress been efficient and effective?

25 **A.** No.

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1 saving and, to be quite fair, it needs to be sold to
2 someone like Horizon -- sorry, I said "like Horizon".
3 Last thing I'd say! Sold to someone like Amazon. It
4 needs a real big injection of money and I only --
5 I think that can only happen coming in from outside.
6 Otherwise, it's just going to be -- it's going to be
7 a bugbear for the Government for the years to come.

8 **MR BEER:** Mr Bates, thank you very much for answering my
9 many questions today.

10 Sir, there is only one set of questions from
11 subpostmaster groups, and they're from Mr Henry and
12 I think will take under ten minutes.

13 **SIR WYN WILLIAMS:** Well, I'm just going to move over here so

14 I can see Mr Henry unimpeded by a large pillar.

15 **Questioned by MR HENRY**

16 **MR HENRY:** Thank you, Mr Bates.

17 You've exposed over many years the Post Office's
18 suppression of disclosure and covering up the truth over
19 Horizon's flaws but you have also exposed, have you not,
20 the Government's reckless indifference to the Post
21 Office's misconduct over many years; would you agree?

22 **A.** Yeah, I think that is the case and, I mean, since all
23 this -- well, since this year, I suppose, since the
24 drama, we've had far more publicity about the issue
25 nationally. I mean, I've noticed there's a general

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1 **Q.** In your case, what have been the principal problems,
2 aside from the timeliness of the reply with the
3 operation of the scheme of redress?

4 **A.** The initial problem was disclosure by Post Office.

5 I mean, once again, they just would not come forward
6 with it and, considering they knew the names of all of
7 those people involved in that scheme from the date when
8 the Minister announced the scheme, which was, I think,
9 March '22, so there's no reason they couldn't have
10 started at that point.

11 **Q.** You mean had a head start?

12 **A.** A head start on it, yeah, obviously. I thought it was
13 quite fortuitous, the comment made by Sir Wyn first
14 thing this morning about disclosure and that you should
15 just carry on regardless and just ignore it. If it
16 hasn't come through, just get on with the job, and
17 I think that's really what should have happened quite
18 a while ago.

19 **Q.** Standing back, what's your experience of the culture of
20 the Post Office in your dealings with it over the years?

21 **A.** They're an atrocious organisation. They need
22 disbanding. It needs removing. It needs building up
23 again from the ground floor and, as I've been quoted
24 quite commonly, the whole of the postal service
25 nowadays, it's beyond -- it's a dead duck. It's beyond

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1 frustration with many other organisations that have that
2 problem with Government, as well. It seems to be
3 a fundamental flaw in the way Government works, that
4 they can't deal with these types of things easily and
5 sensibly.

6 **Q.** Could I take you to a letter you received, and we'll
7 deal with it very briefly, but it's POL00102385. This
8 is a letter you received shortly after 19 March 2015
9 from the Minister, Jo Swinson. You had written to her
10 on 10 March regarding the Post Office Mediation Scheme.
11 Have you had a chance to look at this letter before
12 coming here today?

13 **A.** Possibly.

14 **Q.** Would you care to read it to yourself and, when you have
15 done so, could you let me know because I want to take
16 you to just one passage in it. But I want to give you
17 the opportunity to refresh your memory in case there is
18 anything you would like to point out. *(Pause)*

19 **A.** Yeah.

20 **Q.** Thank you. You can see, at the conclusion, that the
21 Minister states:

22 "To conclude, I note that through Second Sight's
23 Report and the subsequent investigations, there is no
24 evidence of system-wide problems with Horizon. This
25 conclusion has stood firm through nearly two years of

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1 investigation."

2 When did you become aware that the Post Office had,

3 in fact, written to their insurers nearly two years

4 before that to notify them of issues with Horizon,

5 potential issues with Horizon, which were originally

6 going to be described as financial discrepancies that

7 have occurred in Horizon? When did you become aware

8 that the Post Office had written to their insurers?

9 **A.** Well, there are two parts to that answer. The first

10 one, I think, is when a lot of people became aware of

11 it, which was during the -- it was the overturning of

12 convictions over those cases, the Appeal Courts.

13 I think that's when it -- one of the times it arose.

14 But also, I mean, there's a similar reference that I've

15 seen recently in a document disclosed to me for the

16 hearing, and there was -- I'm trying to think of the

17 date. It was July ...

18 **Q.** 2013?

19 **A.** It might be 2013 or -- was this the one -- this is about

20 the -- what do they call it, the officer's and -- D&O

21 insurance?

22 **Q.** Shall I take you to it?

23 **A.** Yes, that would help.

24 **Q.** If we could go to POL00145716, please. I'm going to ask

25 you to look at some correspondence between Charles

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1 "I'd be happy to have one of our insurance lawyers

2 look over the D&O policy [directors' and officers'

3 policy] to see if POL is required to notify the

4 insurers. If not, then we might want to hold fire on

5 this.

6 "I would recommend tweaking the first paragraph.

7 The current version suggests that there are problems

8 with Horizon -- when at present there are no systemic

9 problems to report.

10 "It should just say that the press have reported on

11 'potential issues with Horizon' rather than 'financial

12 discrepancies have occurred in Horizon'."

13 If we could then go, please, to page 1 of the

14 internal numbering. We can see again, this time on

15 29 July, a further email from Mr Parsons and a bullet

16 point summary at the top. Six bullet points. Would you

17 be kind enough, Mr Bates, to read those six bullet

18 points to yourself. *(Pause)*

19 **A.** Yes.

20 **Q.** Do you see anything in there which you consider to be

21 symptomatic of the Post Office's habitual problem with

22 disclosure?

23 **A.** Yeah, certainly the fifth bullet point -- oh no, the

24 fourth and the fifth:

25 "The risk of notification is that it would look bad

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1 Colquhoun -- and this is at page internal numbering

2 4 of 6 -- Charles Colquhoun, Susan Crichton and Andrew

3 Parsons, whom, of course, you know.

4 So if we go to page 4 of 6, Charles Colquhoun,

5 Wednesday, 24 July 2013:

6 "Been discussing this with Miller, what we should

7 tell JLT re Horizon issues. We have worked up the

8 attached version which hasn't been sent -- any

9 comments?"

10 Up a little bit:

11 "Andy, could you take a look at this draft letter to

12 go to our insurance broker re the Horizon issue. I have

13 not looked at it.

14 "Thanks,

15 "Susan."

16 So that's Susan Crichton.

17 Then we have Mr Parsons, 24 July 2013, at 6.51 in

18 the evening:

19 "Susan,

20 "The letter does nothing more than put POL's

21 insurers on notice of the Horizon issues. It's very

22 bland. My own hesitation is whether this is strictly

23 necessary to do. From a PR perspective it would look

24 bad if this got into the public domain -- sign of

25 guilt/concern from the board.

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1 for POL if it ever became public knowledge that POL had

2 notified its insurers. To reduce this risk, it is

3 recommended that rather than sending a formal written

4 notification, POL speaks to Chartis (renamed AIG) and

5 verbally notifies them so as not to leave a paper trail.

6 In our experience, AIG may be prepared to accept

7 a verbal notification."

8 Yes, exactly, yeah.

9 **Q.** So with a view, I suppose, thereafter to plausible

10 deniability over the issue, since there isn't anything

11 written down?

12 **A.** No paper trail.

13 **Q.** No paper trail.

14 Could I now, Mr Bates -- and this is my final

15 topic -- ask you a few questions about the litigation

16 that bears your name. I realise that Mr Beer has

17 already asked you some, but I want you to consider

18 whether the 'no holds barred' approach adopted by the

19 Post Office may not have been motivated not simply to

20 win at all costs to defeat you and your fellow claimants

21 but to kill the prospects of any future criminal appeals

22 that rested on the outcome of your litigation.

23 Now, have you formed a view -- bearing in mind all

24 that has passed, have you formed a view that the conduct

25 of the way in which they approached the Horizon Common

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1 Issues and the Horizon Issues Judgment may, in part,
2 have been influenced by the fact that, rather than just
3 being concerned about losing a money claim, they were
4 also concerned that, if they lost that money claim that
5 you had brought against them, they would then be exposed
6 to potential criminal appeals concerning people who had
7 been wrongly prosecuted, some of whom, of course, had
8 been wrongly imprisoned? Have you formed any view about
9 that?

10 **A.** I'm quite certain that they were very concerned on
11 a whole number of fronts and, certainly, that would have
12 been one of them, and the other one would have been
13 protecting the brand at any cost, I think that was a key
14 one, and protecting the roles of those involved with
15 making the decisions over the years that they took so
16 wrongly.

17 I think there's a whole batch of reasons that they
18 went ahead with it, and I heard a comment that was meant
19 to have come from the board at that time that it should
20 be buried at any cost, this court case. I think we saw
21 that, or saw them trying to do that, along the way. So
22 I have no doubt that they were desperate to get rid of
23 it, and for a whole raft of reasons.

24 **Q.** That would include those criminal appeals --

25 **A.** Oh absolutely.

1 attractive to many of you and I would hate to think
2 that I would have to intervene, when they are here, to
3 prevent bad behaviour. So in the interests of people
4 being even-handed, I am asking you to remember that this
5 is not a public meeting but a public inquiry. It's not
6 a court of law but it's a judicial process. So please
7 leave it there.

8 Tomorrow morning, we will resume at 10.00.
9 As you know, I appeared on the first day of Phase 4
10 and then disappeared completely in the sense that
11 I conducted the hearings remotely. I fear my
12 circumstances are such that that will still be
13 necessary, ie that I will conduct most of the hearings
14 remotely during this passage. I do intend to appear as
15 often as I can but I wanted to be frank with you: it
16 won't be very often. I find that I can do this
17 acceptably but I want to be open with you about what's
18 happening henceforth. All right?

19 So we will resume tomorrow but I'll be on a screen,
20 not sitting here.

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

22 **(4.01 pm)**

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

24

25

1 **Q.** -- which rested on the outcome?

2 **A.** Absolutely, and that they had known they were wrong for
3 many, many years.

4 **MR HENRY:** Thank you, Mr Bates.

5 **SIR WYN WILLIAMS:** I suppose, following Mr Henry's point --
6 and I think I have got this right -- the claims in the
7 GLO on behalf of some of the claimants included claims
8 for malicious prosecution. So, inevitably, the
9 propriety of the prosecutions were in issue, in effect,
10 in the civil proceedings?

11 **A.** Yeah, yeah.

12 **SIR WYN WILLIAMS:** Thank you, Mr Bates.
13 Mr Beer, anything else?

14 **MR BEER:** No, there's nothing arising. That's the end of
15 Mr Bates' evidence.

16 **SIR WYN WILLIAMS:** Well, thank you very much for coming.

17 **THE WITNESS:** Thank you.

18 **SIR WYN WILLIAMS:** Thank you for your witness statement and
19 thank you for providing answers to a great many number
20 of questions.

21 I can see hands preparing and I know what's coming,
22 because it's inevitable, and I fully understand why they
23 want to applaud you, Mr Bates, but I'm going to ask you
24 not to for this reason, that there will be witnesses who
25 are coming in the next so forth who may not be as

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