

Wednesday, 24 April 2024

(9.45 am)

SUSAN ELIZABETH CRICHTON (continued)

Questioning by MR BLAKE (continued)

MR BLAKE: Good morning, sir, can you see and hear me?

SIR WYN WILLIAMS: Yes, I can.

MR BLAKE: Thank you very much. This morning we're going to continue to hear from Mrs Crichton and we hope to finish by the first break of the day. Thank you.

Mrs Crichton, I said yesterday that I'm going to deal today with some miscellaneous topics. The first relates to corporate governance and the overall structure of the business. You joined as Head of Legal in January 2010. Were your responsibilities set out somewhere in a document?

A. That's a good question, they should have been.

I can't -- I certainly haven't got a copy of the job description that I had then but, funnily enough, I can't remember.

Q. On joining, prior to the separation of the business, what did you see your role as being in respect of prosecutions?

A. I don't think I had a role at that point. I think it was made clear to me by the then General Counsel that things that were in Royal Mail, Royal Mail Group, should

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Jarnail Singh. I think you met up with them; is that correct?

A. So my recollection is that I went to see them in Queen Victoria Street, which is where they were based, I think it was very early in 2012, and I think -- I certainly remember going there and having a conversation with Rob Wilson and Mr Singh.

Q. It was just those two individuals?

A. As far as I recollect, yes.

Q. Was there any formal handover process or was that the extent of it?

A. Again, from memory, that was the extent of it. Then, when we separated, Mr Singh came across, if you like, with his portfolio of work and we -- as many separations go, we didn't get any choice as to which lawyers came over. People TUPE transferred, effectively. So POL people, people who were working solely for POL, transferred over and Mr Singh transferred over in the same way.

Q. Taking each of those individuals separately, so Rob Wilson and Jarnail Singh, can you assist us with your views as to their competence and their abilities?

A. I can't comment on Mr Wilson, I'd only -- I'm not sure I had a view about competence *per se* but I had a view about, if I might call it attitude, and their view of

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stay in Royal Mail until separation. At that stage, we didn't even know whether separation would go ahead or not, so I think it was felt important to keep that structure in place.

Q. Did you consider, for example, that you had a role in ensuring that the Post Office fully investigated the root cause of issues relating to the experience of subpostmasters that led to them being prosecuted?

A. No, I don't think I did. I don't think -- interestingly, I'm not sure -- I suppose it would have been Mike Young because the Security Team at that stage reported to him but it was a strange arrangement because there was some Security in Royal Mail Group: Tony Marsh, I think. So that's my recollection and the Legal Team, the Criminal Legal Team, I think, reported in to the GC of Royal Mail.

Q. So, in respect of criminal investigations being carried out by the Post Office, as Head of Legal, you didn't see yourself as having any role in overseeing that?

A. I didn't, no.

Q. On separation from the Royal Mail, you became Legal and Compliance Director and became responsible for the matters that had previously been managed by the Royal Mail Group. You've said in your witness statement that, in early 2012, you had discussions with Rob Wilson and

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subpostmasters and their view generally, and I think some of the correspondence indicates a rather unhealthy view of subpostmasters and what they felt their responsibilities to the business were.

Q. Can you expand on that, please?

A. A little, yes. So -- I'm trying to remember exactly how I formed this conclusion. I think what I'd seen was a -- it was encapsulated in the "This is public money, we have to protect it, that's our job", and there didn't seem to be a step in the process -- well, I didn't see one, there probably was -- a step in the process which said, "Hang on a minute, you know, should we be doing this? As a business, should we be doing this? Is it the right thing to do in this context?" It seemed to be too much of a straight-through process.

Q. In that respect, are you talking about individual cases or the overall prosecution scheme?

A. Some of the -- I think both, probably. But you're going to ask me which each cases now and I don't --

Q. No, we don't need to deal with individual cases but is your concern one of a step within the prosecution process that didn't consider the public interest sufficiently, for example?

A. I think that's right. I think -- so in -- again, in early 2012, I recollect having a conversation with Paula

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1 Vennells about the fact we prosecuted and that the Board
 2 needed to be involved to understand that and, you know,
 3 I remember looking -- I think I remember discussing it
 4 with her but then, because of the Second Sight
 5 intervention, it got put on the backburner.
 6 **Q.** Who put it on the backburner?
 7 **A.** Probably me because I was waiting for the outcome of the
 8 investigation. I should have pushed it through
 9 regardless, you know. I should have just tried to go
 10 ahead.
 11 **Q.** Sticking with Rob Wilson and Jarnail Singh, prior to the
 12 Second Sight Report, did either of them have
 13 a conversation with you relating to bugs, errors or
 14 defects in the Horizon system?
 15 **A.** I can't recollect having that conversation with either
 16 of them.
 17 **Q.** I mean, we know, for example, that Mr Singh was involved
 18 in the *Misra* case?
 19 **A.** Yeah.
 20 **Q.** Did you have a conversation with him about his knowledge
 21 of bugs, errors or defects arising from the *Misra* case?
 22 **A.** I can't recollect doing that.
 23 **Q.** Do you think it's likely or unlikely?
 24 **A.** I would have thought it would be likely but I can't
 25 remember.

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1 a culture relating to legal issues?
 2 **A.** I suppose I felt -- bearing in mind I'd really worked
 3 for two American companies for most of my working life,
 4 the American companies had a very different view of what
 5 the role of a General Counsel was and I felt that,
 6 coming to Post Office, it didn't share that
 7 understanding of that broader role and, therefore -- and
 8 because I was excluded from the Board -- not excluded --
 9 not invited, not a regular attendee -- I wasn't able to
 10 develop that role at Post Office.
 11 **Q.** I'd just like to ask you some questions about certain
 12 things that were or weren't mentioned at Board level.
 13 Yesterday I took you to Board minutes from 12 January
 14 2012. It was minuted that you had told the Board that
 15 the business had won every criminal prosecution in which
 16 it had used evidence based on Horizon integrity. Are
 17 you able to assist us where you got that information
 18 from?
 19 **A.** So I think that would have come from either Rob Wilson
 20 or Jarnail Singh.
 21 **Q.** Are you aware that that information was not right?
 22 **A.** I am now, yes.
 23 **Q.** When did you become aware of that?
 24 **A.** Probably reviewing the documents for this Inquiry,
 25 I think --

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1 **Q.** Moving on to Board meetings, we spoke yesterday about
 2 your exclusion from a particular board meeting. But
 3 you've also said in your witness statement that Board
 4 meetings were, in general, by invitation only to you as
 5 General Counsel. Did you find that unusual at all?
 6 **A.** Yes, previously where I'd worked, as part of the sort of
 7 senior advisory team, if you will, to the business, you
 8 would be invited to the Board meeting, whether or not
 9 you had a particular matter to present, just so that you
 10 could give advice to the Board and you were -- and often
 11 you'd do that by being Company Secretary but, actually,
 12 Company Secretary is a job on its own, really and so,
 13 therefore, when I wasn't Company Secretary, I didn't
 14 necessarily go to the Board meeting.
 15 **Q.** Had the logic of not inviting the General Counsel to the
 16 Board been explained to you at all?
 17 **A.** So not specifically but I was aware that the Chair at
 18 that time wanted to try to reduce the number of people
 19 at the Board meetings. Again, my recollection is she
 20 was trying to ensure there was better discussion and --
 21 whilst the Board was developing, so she didn't have too
 22 many people in the room because there was a lot of
 23 discussion about what the right number is to have on
 24 a Board.
 25 **Q.** Did it suggest to you in any way an attitude or

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1 **Q.** Two --
 2 **A.** -- in that absolute sense, you know, because it's a very
 3 absolute statement.
 4 **Q.** Did you think at the time this is a very strongly worded
 5 statement?
 6 **A.** I should have been more suspicious, yes.
 7 **Q.** You say you should have been; that's probably in
 8 hindsight. At the time, did that across your mind at
 9 all?
 10 **A.** No, I don't think so. Partly because, you know, if
 11 people are making that very absolute statement and
 12 they're lawyers and, again, this is with hindsight, you
 13 tend to think "Well, actually, they've been in the
 14 business a long time, they must know what they're
 15 talking about".
 16 **Q.** Two items that weren't necessarily discussed at Board
 17 level: the first, Simon Clarke's advice on Gareth
 18 Jenkins, which also mentions bugs, errors and defects in
 19 Horizon. Can we just please bring up on screen
 20 POL00039999. This is just a covering email. If we
 21 scroll down, please, we can see at the bottom Martin
 22 Smith sending you Simon Clarke's advice on Gareth
 23 Jenkins on 17 July 2013.
 24 We also have, separately, Simon Clarke's advice on
 25 document retention, the shredding issue, and that's

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1 an advice that I took you to yesterday. That can come
2 down. Thank you.

3 Are those matters which, in your view, should or
4 shouldn't be raised with a board?

5 **A.** They should have been raised with the Board, yes.

6 **Q.** Were they?

7 **A.** I'm not sure they were raised in those terms. So
8 I think the outcome of those were raised, in the sense
9 of we then had to review the prosecutions, look for new
10 expert evidence, but I'm not sure, I can't fully
11 remember and, again, it would have been something
12 I might have discussed rather than written down, about
13 the fact that Gareth Williams (*sic*) was an expert we
14 could no longer use, and to explain why that was so
15 important to the Board.

16 **Q.** Does that fit in with a culture that we described
17 yesterday of not writing things down and instead
18 communicating them?

19 **A.** No, not for me because I generally wasn't at the Board
20 meeting. So if I'd really wanted -- if I absolutely
21 knew -- I think I discussed it with Paula, I can't
22 remember now, there was a lot going on at the time
23 which -- so ...

24 **Q.** So taking each one of those, both of those separately,
25 when did you think you discussed them with Paula

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1 **Q.** Can you assist us with why it wasn't?

2 **A.** I just don't think there was the opportunity.

3 *(Pause for fire alarm test)*

4 **Q.** You've said in relation to the shredding advice that you
5 didn't think that there was the opportunity to raise
6 that at board level. Can you assist us with what you
7 mean by that?

8 **A.** I'm trying to remember what the sequence was and we've
9 looked at a number of -- there are number of briefing
10 papers in the pack, both old evidence and the new that's
11 come true. I would need to go back through those to
12 find out, track it through but, as far as I can
13 recollect, there wasn't a Board meeting -- there were --
14 but there were Board update calls.

15 So I would have put it in the brief -- if the
16 briefing had come to me, I think I would have put it in
17 the briefing note but I don't think we've seen it in
18 that.

19 **SIR WYN WILLIAMS:** I'm sorry, I'm not quite following this.

20 You, I think, very fairly have accepted that the purport
21 of the advice about Gareth Jenkins and what we're
22 calling the shredding advice should have gone to the
23 Board?

24 **A.** I am, yes.

25 **SIR WYN WILLIAMS:** Yes. So the question of timing, which is

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1 Vennells?

2 **A.** I think pretty soon after I got the advice, certainly
3 with regard to Gareth Jenkins. In fact, I think there's
4 a note somewhere in one of the briefing papers about us
5 having to, you know, (a) do the criminal -- as I say,
6 it's the outcome of that, as opposed to the process.

7 **Q.** But would you have gone into some detail about the
8 advice that was received in respect of reliance on
9 Gareth Jenkins? Would you have, for example, told
10 Ms Vennells that there had been an expert whose evidence
11 was unreliable and which was used in criminal
12 prosecutions?

13 **A.** I can't remember but it's likely that I would have done.

14 **Q.** Document retention, the shredding advice. That's
15 obviously a very serious allegation. Would you have
16 discussed that matter with the CEO?

17 **A.** Again, I can't remember but, yes, I would have -- think
18 it's likely I should have done -- would have done.

19 **Q.** Should have done or would have done?

20 **A.** Should have done.

21 **Q.** Do you think you didn't?

22 **A.** I can't remember. I really can't remember.

23 **Q.** Do you think that that is such a significant issue that
24 that should have been raised at Board level?

25 **A.** Yes.

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1 what I regard as being the opportunity point, surely is
2 secondary to putting in place a process which ensured
3 that, at some time, it got to the Board?

4 **A.** I agree.

5 **SIR WYN WILLIAMS:** Right. Now, you weren't attending the
6 Board, so you couldn't personally just turn up at
7 a Board meeting and raise it, so what should have
8 happened to ensure that it got to the Board at some
9 point?

10 **A.** What would normally happen is that you would talk to the
11 CEO, or the Chair or the Company Secretary but, really,
12 in POL it would have been one of those two, and said,
13 "This needs to come to the Board or I need to bring
14 a Board paper. These are the things it needs to cover,
15 it's urgent and it needs to be done more quickly", and
16 to schedule either a Board call or an *ad hoc* Board
17 meeting. That's what would happen in other companies.

18 **SIR WYN WILLIAMS:** Right. So are you accepting -- and I'm
19 putting this neutrally for the moment -- that you
20 personally should have alerted either Paula Vennells or
21 Alice Perkins to the fact of those advices and suggested
22 to them that it should be raised at Board level?

23 **A.** So I think what I did was to raise the outcome of those,
24 so, in other words, the review of the criminal cases.

25 I think that was raised as part of the Board paper and

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1 as part of the update. I cannot remember whether the
2 whole piece was raised as part of the Board updates.
3 So, in terms of our expert witness being discredited, as
4 opposed to the Second Sight Report, which disclosed the
5 bugs that Gareth Jenkins raised and the Helen Rose
6 report needing to be disclosed to -- in respect of past
7 cases, past criminal cases.

8 **SIR WYN WILLIAMS:** I appreciate that you have told me you
9 can't remember precisely or even in general terms,
10 perhaps, what happened, but my question was about what
11 should have happened, all right?

12 **A.** Yes.

13 **SIR WYN WILLIAMS:** Are you accepting, either with the
14 benefit of hindsight or, for that matter, with
15 foresight, that it was your responsibility, as the
16 senior lawyer to receive these advices, to put in place
17 a process which ensured that the Board became aware of
18 both of them?

19 **A.** Yes, I do accept that. But what I would say is that it
20 wouldn't be my general practice to send Board members
21 advice from counsel. It would be my general practice to
22 send them a summary of that advice as it related to the
23 Board if you will or the business.

24 **SIR WYN WILLIAMS:** No, I follow and I'm not, in terms of my
25 questioning, asking you, you know, should you have sent

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1 the branch system and could generate questions around
2 how the discrepancy was caused. This solution could
3 have moral implications of Post Office changing branch
4 data without informing the branch."

5 Now, prior to the allegation made by Mr Rudkin
6 during Second Sight's investigation, were you aware of
7 the ability to alter the Horizon branch figure?

8 **A.** I think the only -- the way I would have been aware that
9 it was probably as part of the Second Sight review, is
10 about the transaction corrections.

11 **Q.** Mr Rudkin, during that process said that he had visited
12 the Fujitsu headquarters and was shown how to access and
13 amend the live Horizon system.

14 **A.** Yes.

15 **Q.** Do you recall that allegation?

16 **A.** I do.

17 **Q.** Prior to that allegation, did you have any awareness of
18 the possibility of doing something like that?

19 **A.** Not as far as I can recollect, no.

20 **Q.** Can we please look at a transcript that has been
21 recorded from a conference call with Second Sight. It's
22 INQ00002021, please. The Inquiry has obtained
23 transcripts of a conference call with yourself, Alwen
24 Lyons and Ian Henderson of Second Sight. This one is
25 dated 22 May 2013. I'm sure you'll be familiar with the

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1 the advices but I am, I think, getting from you the
2 answer "I, Ms Crichton, should have put in place
3 a process whereby the substance of those advices should
4 have gone to the board".

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

6 **SIR WYN WILLIAMS:** Yes, okay. Thank you.

7 **MR BLAKE:** Moving on to a different topic, remote access,
8 can we please bring on to screen FUJ00081584, please.

9 This is a document from October 2010. I'll make very
10 clear, you're not an attendee at this meeting, there's
11 no evidence that you ever received this document. But
12 did you work with Ian Trundell or Andrew Winn?

13 **A.** Not as far as I can recollect, no.

14 **Q.** This relates to the receipts and payments mismatch issue
15 and if we turn over, please, to page 3, there are
16 proposed solutions to the problem. The Inquiry has seen
17 this a number of times. "Solution One", it says:

18 "Alter the Horizon branch figure at the counter to
19 show the discrepancy. Fujitsu would have to manually
20 write an entry value to the local branch account.

21 "Impact -- When the branch comes to complete next
22 trading period they would have a discrepancy, which they
23 would have to bring to account.

24 "Risk -- this has significant data integrity
25 concerns and could lead to questions of 'tampering' with

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1 issue, it was recently reported on Channel 4 News,
2 albeit not obtained from this Inquiry.

3 You've had a chance to look at this transcript and
4 I think your lawyers have fed back on various
5 corrections to the transcript.

6 **A.** Yes, we've run the transcript against the recording.

7 **Q.** Can we turn to page 57, please, and this is where the
8 issue of remote access is addressed. I think, if you
9 scroll down we can see some wording is in green, some is
10 in red. The green has been agreed between both yourself
11 and also Alwen Lyons as to who is speaking, for example.
12 The red is not agreed but I don't think it actually
13 makes any difference for the purpose of the question
14 that I'm going to be asking.

15 I'll just read to you a brief section from this
16 transcript. It starts from Ron Warmington and he says:

17 "If James says something like 'and where are you on
18 this assertion about the Bracknell Covert Operations
19 Team' as it was referred to by Rudkin and, remember,
20 he's got a direct line to Shoosmiths. They're chummy
21 apparently. So they will have told him about this, for
22 sure. So, you know, if he challenges her on it --"

23 You reply:

24 "-- (unclear) say, well, that's a specific case --"

25 Then we go over the page please, it's unclear. You

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1 say:
 2 "Come back to -- when we've finished the
 3 investigation."
 4 Ron Warmington says:
 5 "Yeah, as long as she doesn't come back and say,
 6 'Well, he mentioned this Bracknell issue. What is he
 7 talking about?'
 8 "Oh, we've known about that for, you know, two
 9 months'."
 10 You say:
 11 "No, she knows about the allegation."
 12 Ron Warmington says:
 13 "Oh okay."
 14 You say:
 15 "She knows we're working on it."
 16 Ron Warmington then says:
 17 "That's all right then. Okay. Good, good, good."
 18 Then you say:
 19 "So we mentioned it to her."
 20 He says:
 21 "Okay."
 22 You say:
 23 "We've all been going, well that is all very odd."
 24 He says:
 25 "But I think she needs to be prepared for the ...
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1 access issue prior to this recording, this meeting?
 2 **A.** As far as I can recollect, yes. That's what I say.
 3 **Q.** What can you recollect from that conversation?
 4 **A.** I think it probably was part of -- so I don't remember
 5 the actual conversation but it would have been, it is
 6 likely that it was, some update around the Rudkin
 7 allegation, the fact that we were investigating it, the
 8 fact that that went back to 2008, that I'd asked the --
 9 Simon Baker who was the project manager to assist. We'd
 10 looked -- started looking for the emails, so I think Ian
 11 had just got a dump of the emails, and we're trying to
 12 understand what was going on in the building.
 13 So my process was to investigate, to try to prove or
 14 disprove that this was correct.
 15 **Q.** This meeting was on 22 May 2013. When, approximately,
 16 do you think you had a conversation with Paula Vennells
 17 about that issue?
 18 **A.** I think it would have been -- so it would have been
 19 before that.
 20 **Q.** Long before that, shortly before that?
 21 **A.** Well, the Rudkin case came in, I think, according to the
 22 papers I've got, from around about February and so
 23 I think it would have been -- sorry I can't be more
 24 specific but it would have been between then and May but
 25 I think it would be rather towards the beginning of that
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1 journalist-type question, you know."
 2 You say:
 3 "When did you last beat your wife [type question]?"
 4 He says:
 5 "Yes, and in relation to, sort of Bracknell, can you
 6 assure me that there is not, you know, backdoor, some
 7 remote capability, you know, at Bracknell or elsewhere,
 8 you know, that had been used to the detriment of
 9 [subpostmasters]."
 10 You say:
 11 "She won't. I mean --"
 12 Alwen Lyons says:
 13 "I don't think James will ask her -- you know, if he
 14 did, I think she could quite rightly say, 'My
 15 understanding is that that's one of the things in the
 16 Spot Reviews and that's what we're looking at; so, you
 17 know, we'll get to it when we've gone and looked at the
 18 evidence James'. I think, you know, that's where
 19 I would push her in that."
 20 He says:
 21 "Okay."
 22 Alwen Lyons says:
 23 "I don't think she's going to start talking about
 24 cases, to be honest."
 25 Did you speak to Paula Vennells about the remote
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1 because I think we'd have said "One of the Spot Reviews
 2 we're working on is this and this what the allegation is
 3 and this is how we're working on it".
 4 **Q.** At that stage, did you or Ms Vennells, or anybody else
 5 that you were working with, have a view as to whether
 6 there was or wasn't substance in that allegation?
 7 **A.** I didn't have a view. I was trying to find out what the
 8 facts were.
 9 **Q.** How about others?
 10 **A.** I don't know what other people thought. I mean, I think
 11 we were concerned, it felt like a -- it was obviously
 12 a very concerning allegation and we had to investigate
 13 it.
 14 **Q.** You were going to say "it felt like a"?
 15 **A.** It was a strange allegation and it was very specific,
 16 which is why I felt we really had to investigate it and
 17 find out what had happened but it was very different
 18 because it was, I don't know, five years ago.
 19 **Q.** Paragraph 164 of your witness statement, you've pointed
 20 to an email exchange as confirmation that Fujitsu didn't
 21 have means of accessing the system or at least
 22 confirmation that you had been told that they didn't
 23 have such means. Could we bring that email on to the
 24 screen, please. That's POL00029605. It's an email from
 25 16 June 2013, so the next month, from Steve Allchorn.
 20

1 Who was Steve Allchorn?
 2 **A.** My recollection is that he worked for Lesley in the IT
 3 Team.
 4 **Q.** To Lesley Sewell, copied to you. He forwards on
 5 an email. If we could scroll down, please, to the email
 6 on page 2, the top of page 2, it's an email from
 7 somebody called James Brett, who is a senior test
 8 manager at Fujitsu. The email begins by identifying
 9 that, in 2008, they were in test preparation mode for --
 10 I think that's Horizon Online and:
 11 "... in parallel, supporting testing of the existing
 12 Horizon estate. In the basement at that time there
 13 would have been 4 separate test environments", and he
 14 identifies the environments.
 15 Then he says:
 16 "Along with these environments, preparations
 17 activities were underway in the basement to build
 18 a volume and release indictment for [Horizon Online],
 19 but these environment would not have been in a working
 20 state at the time of the statement.
 21 "[The Post Office] had access to the functional test
 22 environment, and I've asked people in my team around the
 23 time, and no one can recall any external visits, or
 24 Mr Rudkin specifically."
 25 So the suggestion at the top there is that, in terms
 21

1 it and I'm afraid I probably just looked at the first
 2 couple of emails from Steve Allchorn and Lesley.
 3 **Q.** So if we scroll up, please, to the first page, there's
 4 no mention of that paragraph in the covering email that
 5 was sent to you.
 6 By the time you left the business, were you aware
 7 that Fujitsu could have live access of some sort?
 8 **A.** I can't remember being aware. So I don't know whether
 9 I was or not. I don't think I was.
 10 **Q.** Do you recall, for example, discussing the matter with
 11 Lesley Sewell?
 12 **A.** I might have done. I can't recollect that.
 13 **Q.** I'm going to move on to a different topic and that is
 14 external legal advisers, starting with Bond Dickinson
 15 and Cartwright King. Can we please have a look at
 16 POL00186725. It's just a very quick matter of
 17 clarification.
 18 This is during the period of the Spot Reviews and
 19 we're in May 2013. There's an email there from Rodric
 20 Williams to Simon Baker, referring to Bond Dickinson
 21 settling a response to a spot review and signing off by
 22 Alwen/Susan. What exactly was Bond Dickinson's role in
 23 formulating or settling the Post Office's response to
 24 the Spot Reviews?
 25 **A.** My recollection is that we collected response to the
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1 of the basement, there is a testing environment that
 2 wouldn't have had access to live data but, if we scroll
 3 down in this email, he has another paragraph there and
 4 it's an important paragraph. It says:
 5 "For perspective, there is live access available at
 6 Bracknell, and there would have been in Horizon days
 7 too."
 8 I think that's Legacy Horizon, prior to Horizon
 9 Online.
 10 "However, this access is available only to Fujitsu's
 11 SSC (System Support Centre) team who provide expert
 12 support to Helpdesk staff. They are based on the 6th
 13 floor, which is the most secure floor in Bracknell.
 14 Visitors are by appointment only and are not allowed to
 15 be unattended. The SSC team follow strict protocols
 16 relating to access and interrogation of live data, and
 17 their access is logged and auditable. There is no
 18 access to SSC systems from the basement."
 19 So do you accept that, looking at this and reading
 20 this now, an email that was copied to you, you were, in
 21 June 2013, in receipt of an email that confirmed there
 22 was live access available but it was on sixth floor of
 23 the building?
 24 **A.** I think in my witness statement I say that, yes,
 25 I obviously received that, my attention wasn't drawn to
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1 Spot Reviews that Second Sight had done and Simon would
 2 have pulled those together from number of parties and
 3 then, because we didn't have many people on the ground
 4 in terms of Legal team, that we asked Andrew Parsons
 5 from Bond Dickinson to review these to make sure they
 6 made sense hung together and just as a review process.
 7 **Q.** Was it just a review or were they input substantively?
 8 **A.** I can't remember that. I can't remember that.
 9 **Q.** Moving on to Cartwright King, what was your view as to
 10 the service that was provided by Cartwright King?
 11 **A.** So I -- I think there are two points there. One is we
 12 looked into the -- we reviewed them but, actually, none
 13 of us were really qualified to review their processes
 14 because we weren't criminal law experts, so I should
 15 have got somebody -- with hindsight, again -- as say in
 16 my witness statement, to review that process more
 17 carefully. I recollect that they told me that they were
 18 responsible for the prosecutorial compliance, if you
 19 will, but, obviously, I understand that one can't
 20 outsource that, just as in Financial Services you can't
 21 outsource your compliance responsibility. But I think
 22 that I should have done more around that more quickly,
 23 after separation.
 24 **Q.** So you inherited Cartwright King as a firm that was
 25 already used by the business; is that correct?
 24

1 A. Yes, that's correct. It came over with -- on
2 separation.

3 Q. Upon separation, did you take any steps to satisfy
4 yourself that they were competent to take the role that
5 they were undertaking?

6 A. So we did some due diligence, in the sense that my Head
7 of Legal went up to Nottingham, I think, to meet with
8 them. I think he went with Mr Singh. So they would
9 have explained how they operated. Then they came to see
10 me, and we had a conversation about, again, how they
11 operated, what their lines of communications were into
12 the business, how they got their information, and how
13 they managed that. I'm afraid what I didn't do is
14 really do a drains up on their processes, to say -- to
15 see that they were compliant.

16 Q. If you had, what do you think you would have found?
17 What are your concerns now?

18 A. Well, I suppose having listened to some of the evidence,
19 particularly with regard to the *Misra* case -- well, that
20 would be Mr Singh, sorry. Having listened and having
21 read what I've read, my concern was that they weren't
22 taking their obligations seriously, that it had just
23 sort of rolled over from being Royal Mail Legal and they
24 were acting in the same way as Royal Mail Legal had
25 acted. But I'm not a criminal law expert but that's

25

1 statements were backed by the evidence that they had
2 found. So I wasn't seeking to wordsmith it necessarily,
3 because it was obviously Second Sight's report, but
4 I was seeking to verify that it was evidentially based.

5 Q. Did you do that by comment boxes, track changes or
6 something else?

7 A. No, we had a conversation. I think they came in, again
8 on 1 July, we walked through, we had a discussion about
9 it, and we tried to agree the way forward, and then, as
10 far as I can recollect, Ian Henderson took it away and
11 produced another draft or another version.

12 Q. Turning to the first page and the bottom email, please.
13 Martin Smith has now received this draft report, or half
14 of a draft -- first half of the interim report -- and he
15 says as follows, he says:

16 "Our advice overall with regard to disclosure has
17 not changed. The disclosure of a partial report would
18 not meet with our duties or help the current situation.
19 I think the disclosure of a partial report would provide
20 partial information and give rise to adverse publicity
21 and speculation. It would be far better to advise once
22 we have seen the entire report. Having said that the
23 Second Sight Report would not need to be disclosed in
24 every case -- that decision would be taken on
25 a case-by-case basis. In many cases, it will not be

27

1 certainly how it seems to me.

2 Q. Can we look at POL00006541, please, and can we start at
3 page 2. Thank you. If we could scroll down on page 2
4 to the bottom email. We have Hugh Flemington emailing
5 number of people, but emailing, in particular, Simon
6 Clarke and Martin Smith of Cartwright King, what is
7 called a first rough draft from Second Sight of one half
8 of the interim report. I can tell you, having looked at
9 this as a standalone document, that it attaches what's
10 called version 18A of the Second Sight Report. Were you
11 sent a number of different versions of the interim
12 report? I know you mentioned two yesterday but were
13 there multiple drafts sent --

14 A. There must have been because I think the final one was
15 version 24, from memory.

16 Q. The final draft or the final version?

17 A. I think that was the final version.

18 Q. Did you input into those drafts?

19 A. Certainly one of them was the document that we had
20 a discussion around on 1 July. I couldn't say which
21 draft that was now.

22 Q. You input substantively, though. Were these typo
23 corrections? Were they crossings out? Were they adding
24 words?

25 A. No, they were really discussions about whether the

26

1 disclosable."

2 Did you have any concerns about that advice?

3 A. At the time I don't think I did, no. I was relying on
4 Cartwright King as criminal lawyers to advise me on
5 disclosure.

6 Q. If we scroll up, please, we have a response from Rodric
7 Williams. He says:

8 "How could the Interim Report be used by those who
9 had been prosecuted, whether found guilty or not
10 (ie those who complain about being selected to the
11 stress etc of prosecution)?"

12 Do you recall anyone raising any concerns about the
13 advice that had been received in respect of disclosure
14 of that draft report?

15 A. No, but it was the reason, I think, in order to verify
16 the process that Cartwright King had suggested and were
17 undertaking, that was why I had asked Bond Dickinson to
18 instruct Mr Altman to review the process and to review
19 the disclosure process, and to advise whether we should
20 go further, so, after the sifting process and the
21 disclosure process, in order to ensure that we were
22 meeting our obligations.

23 Q. We had Simon Clarke advise of the need to conduct
24 a review on 8 July 2013. Moving on from there, I'm
25 going to take you to an email of 16 July. It's

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1 POL00192214. Can we please look at the third page, the
2 bottom of the third page. You say at the bottom of the
3 third page:

4 "Andy -- we received a letter from the CCRC
5 yesterday which I have asked Cartwright King to review
6 ... their advice feels odd to me as if given on a take
7 it or leave it basis and I am not comfortable that's
8 particularly useful in this context. Could we discuss,
9 I am happy to go to another firm that specialises in
10 criminal law or a barrister, somehow it feels as if
11 there is a conflict here which I am not sure
12 I understand."

13 Can you recall this conversation?

14 **A.** I can recall the response coming in, and I can recall
15 looking at it and thinking -- and also more generally
16 thinking -- that I wanted to make sure that the process
17 we were doing was correct, so that's why I really wanted
18 to get somebody to take another look at it, because
19 I didn't feel I was competent to say whether the sifting
20 process and whether the disclosure process was credible
21 in the context of what we were looking at.

22 **Q.** Were you concerned about a potential conflict of
23 interest at Cartwright King and can you explain that to
24 us?

25 **A.** So it was, you know, as we say, marking your own
29

1 being the temporal limit of the review. On "Conflict of
2 interest", he says as follows. He says:

3 "I can foresee circumstances where a conflict of
4 interest might arise where Horizon and/or [I think
5 that's Gareth Jenkins] are the focus of complaint.
6 A hypothetical example may suffice: in a given case it
7 may be alleged that Dr Jenkins did not properly fulfil
8 his role as an expert witness because he failed to
9 disclose something that Second Sight's Interim Report
10 has now revealed. If Dr Jenkins were to claim, when
11 confronted by such an allegation, that he had in fact
12 informed counsel and/or a representative of [Cartwright
13 King] of the very thing he is now said not to have
14 disclosed, that would give rise [to] a clear conflict,
15 and, if there were a conflict of recollection about it,
16 then that might lead to real difficulty in [Cartwright
17 King's] further involvement in reviewing the case."

18 But then he goes on, if we scroll down.

19 Paragraph 18, he says as follows:

20 "There is, I believe, benefit in [Cartwright King]
21 and its internal counsel identifying and engaging in the
22 review of impacted cases, as they are familiar with
23 their case files and intimate with the process. But it
24 seems to me it will be wise for me to dip sample some of
25 their work in due course, and I may have to devise

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1 homework and, whilst I wanted to get the process
2 started, and I think they started in July, I felt
3 getting it started was the right thing to do, so that
4 things got moving quickly, particularly in relation to
5 prosecutions that were ongoing or due to come to trial.
6 I also felt that we needed to be sure that the process
7 that they were undertaking was credible and the best
8 that could be done in the circumstances.

9 **Q.** Brian Altman was instructed to provide his observations.
10 Can we please turn to his interim review that's
11 POL00006583, please. Was the purpose of this
12 instruction for the reasons that you have just set out,
13 that you were concerned about a conflict of interest, or
14 was it something else?

15 **A.** I think it was that general "Is this a credible response
16 to the position we find ourselves in?"

17 **Q.** Thank you. So this is his interim review. Can we
18 please turn to page 6 of that, which sets out some
19 conclusions. He says as follows:

20 "I can conclude on the available information that
21 the approach of [Cartwright King] and counsel appears to
22 be fundamentally sound, but the followed issues need
23 addressing by [the Post Office] and/or [Cartwright King]
24 ..."

25 The first being the geographical limit; the second
30

1 criteria of my own for those cases I feel I should
2 review personally."

3 What was your view about this advice?

4 **A.** That I thought it was sensible.

5 **Q.** Did it lead you then to continue with Cartwright King?
6 Were you ever thinking of not continuing with the
7 Cartwright King process?

8 **A.** Not at this time, no. I think what it did do is sort of
9 assure me that, at least as a first step, it was
10 credible but it was sort of caveated with these other
11 points, so, in relation to the geographical, the
12 temporal and the possible conflict.

13 **Q.** If we could turn to POL00298123 and page 3., it appears
14 that the advice was sent by Mr Altman to Bond Dickinson.
15 Can you assist us with what Bond Dickinson's role was in
16 the review of Cartwright King's work?

17 **A.** I'm not sure they had one, particularly. I think
18 they -- I was probably just using them as a convenient
19 way of instructing counsel. I think I did ask, sort of
20 from a common sense point of view, because, again,
21 they're not specialist criminal lawyers either, for
22 their views.

23 **Q.** Was there any tension between the various sets of
24 lawyers and law firms, be it Cartwright King, Mr Altman
25 or Bond Dickinson?

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1 A. I didn't feel so at the time.
 2 Q. Looking back at it now?
 3 A. I think there could have been a level of defensiveness
 4 from Cartwright King, which I probably didn't
 5 appreciate.
 6 Q. Can we please look at POL00337138. Moving now to
 7 September 2013 -- actually, sorry, yes, we're still in
 8 August. If we scroll down to the second page, please,
 9 there's reference there, just below that, to a response
 10 by Harry Bowyer of Cartwright King to Mr Altman's
 11 advice. If we scroll down, sorry.
 12 Then, in the email above, you send Andrew Parsons
 13 an email saying:
 14 "Thought you might be interested to see what started
 15 that particular 'hare' running!"
 16 Can you recall this discussion at all?
 17 A. I really can't. I can recall -- because I think the
 18 Harry Bowyer response was in response to Mr Altman's
 19 questions in his interim report and that was then sent
 20 to Brian Altman.
 21 Q. If we could scroll up please to the very first email.
 22 We see you there say:
 23 "... we had a call with [Cartwright King] this
 24 morning and we definitely need a [conference] with Brian
 25 when he gets back -- we may need this in two parts one

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1 duty of disclosure.
 2 It's the continuing duty of disclosure that I'd like
 3 to ask you about. Could we please turn to page 3 and,
 4 halfway down, we have the advice from Mr Altman. It
 5 says:
 6 "[Mr Altman] advised considerable caution in
 7 relation to mediation cases involving previously
 8 convicted individuals (Seema Misra has already indicated
 9 an intention to be within the scheme). The concern is
 10 that lawyers acting for those individuals may be using
 11 the scheme to obtain information which they would not
 12 normally be entitled to in order to pursue an appeal.
 13 "[Mr Altman] said that it was important that [the
 14 Post Office/Cartwright King] took control over all the
 15 information disclosed to these individuals by [Second
 16 Sight] so that [the Post Office/Cartwright King] were
 17 not 'blindsided' by evidence that they are not aware of.
 18 The information being sent out to the individuals must
 19 be audited by [Cartwright King]."
 20 Do you recall anyone querying that advice at all?
 21 A. No, I don't.
 22 Q. As General Counsel at that time, did that raise any
 23 concerns with you?
 24 A. Yes, it did because I wanted the -- I wanted the
 25 Mediation Scheme to be able to go ahead but there was

35

1 with [Cartwright King] and one just with [the Post
 2 Office] ... need to work on tactics. Could you see when
 3 he is available?"
 4 Can you assist us with what you meant there in terms
 5 of tactics?
 6 A. So it sounds to me like I was aware that there was
 7 a conflict of interest and there was some possibly
 8 friction between Cartwright King and us, and possibly
 9 they were annoyed with -- I'm speculating now but it
 10 clearly looks like that's what I thought at the time.
 11 Q. When you say conflict of interest, in what respect?
 12 A. It was my point about marking your own homework.
 13 Q. Can we now, please, turn to POL00006485. We are now in
 14 September, 9 September 2013. This is a conference with
 15 Mr Altman. You are there in attendance. Slightly
 16 confusing because there are two SCs in the minutes so,
 17 on occasion where there's a reference to "SC", it's
 18 actually Simon Clarke.
 19 We see there "GM", Gavin Matthews, from Bond
 20 Dickinson. He stated that the conference had been set
 21 up for three reasons: (a) first of all -- sorry, if we
 22 could scroll down -- allow Brian Altman to get a fuller
 23 understanding of the review process; discuss the issues
 24 raised in his interim review and Mr Bowyer's response;
 25 and to address the issue of the Post Office's continuing

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1 this tension between the cases that had had criminal
 2 prosecutions or, I guess, any cases taken against them,
 3 and the fact of entering into the Mediation Scheme.
 4 Q. Did you, at the time, think that it was proper to
 5 withhold disclosure from somebody in a Mediation Scheme
 6 because it might give them an opportunity to pursue
 7 an appeal?
 8 A. No, I didn't. I thought they should have the
 9 information.
 10 Q. Did you say so at that meeting?
 11 A. I can't recall saying so.
 12 Q. So did anybody say so at that meeting?
 13 A. It's not documented that they did.
 14 Q. Looking back at it now, what do you think went wrong
 15 there?
 16 A. My view is that they would -- my view was that they
 17 would be able to be part of the Mediation Scheme and
 18 that we should give them the documentation.
 19 Q. Can we please look at POL00116136. This is a note of
 20 a meeting with Sir Anthony Hooper with Paula Vennells,
 21 Alasdair Marnoch and Martin Edwards. You weren't
 22 present at this meeting. It's a document that I took
 23 Sir Anthony to and it's the second page, please, point
 24 (e) that I'd like to ask you about.
 25 Sir Anthony advised as follows, he said that:

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1 "... 'sorry was a good word!' -- we should be
2 prepared to apologise to subpostmasters where
3 appropriate", during that Mediation Scheme.
4 Were you aware of that advice?
5 **A.** No. Oh, hang on, so the 24th, I think Martin -- I might
6 have been copied on to the -- I apologise. I have
7 definitely seen the "sorry was a good word!" attributed
8 to --
9 **Q.** It may be of assistance if I take you to one more
10 document before you answer that. Could we please look
11 at POL00066817, please. It's an email from Martin Smith
12 to you on 26 September. He says:
13 "Thank you for your email. I have had look at the
14 note of the meeting with Sir Anthony Hooper ..."
15 I'll read you two passages, if we could scroll down.
16 He said:
17 "Brian expressed a concern that the slightest
18 apology to a convicted person or the payment of
19 compensation could indeed give rise to an appeal. He
20 was concerned that Misra would use the Mediation Scheme
21 to obtain some sort of concession to allow her to
22 appeal.
23 "I note from paragraph 4(e) Sir Anthony Hooper
24 observed that 'sorry was a good word'. If he intends to
25 use it in relation to any convicted person allowed into
37

1 at that point anyway, which was being mid-2012, that was
2 part of her rationale for saying that it needed to be
3 looked at and opened up.
4 **Q.** Having received this advice, did the approach change?
5 **A.** I really don't know. I was on holiday from 27 September
6 and I really didn't go back into the business.
7 **Q.** Looking at it now, is it advice that you think was
8 sensible or unhelpful?
9 **A.** So, to me, it doesn't work together with the Mediation
10 Scheme but I think I was coming at that from a very
11 different place.
12 **Q.** Thank you. The very final topic, and I'll be very
13 brief, is the devolved administrations. You qualified
14 in England. Did you have any knowledge of Scots Law,
15 for example?
16 **A.** No.
17 **Q.** Did anyone in your team have such knowledge?
18 **A.** Not as far as I'm aware.
19 **Q.** Do you recall looking into Scottish cases or Northern
20 Irish cases as part of the reviews that we've been
21 talking about?
22 **A.** I asked Cartwright King to manage that process as part
23 of their review process and I think they updated
24 Mr Altman with what they were doing in that respect.
25 Whether that -- and I think they'd appointed local
39

1 the Mediation Scheme, the possibility of a successful
2 appeal may well be increased."
3 Do you have concerns about that advice at all?
4 **A.** So I don't remember getting this and I was probably on
5 my way out of the business. I remember the advice from
6 Mr Altman about, you know, not -- because I think in one
7 of the shorter form notes he makes a point that --
8 I think somebody asked the question "Should we
9 apologise?", and he said no, and it's a similar -- and
10 it's the opposing view here.
11 I felt that if we were going to go through with the
12 Mediation Scheme then that had to be part of it. In
13 other words, that we needed to disclose the information
14 and that, if that was disclosed and that gave rise to
15 the ability to appeal, then that's what should happen.
16 **Q.** Did you express that to anybody?
17 **A.** I think so but I really can't remember now.
18 **Q.** In terms of the corporate approach to the Mediation
19 Scheme, did that accord with the views that you've just
20 set out or were they different?
21 **A.** I think when it started, as far as I was aware, it did,
22 because we shouldn't have -- well, I think it did.
23 I think it did because, if you go back again to the
24 chairman's note about the conversations she and I had,
25 you know, then some time before this, you know, she was
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1 firms, again from memory, both in Scotland and in
2 Northern Ireland, to take part in that process with
3 them, and it's in one of the documents. It might be the
4 Harry Bowyer advice.
5 **Q.** You spoke yesterday about a decision not to continue
6 with prosecutions where Horizon played a significant
7 part or some similar kind of test. Was that in any way
8 communicated to, for example, the Scottish or the
9 Northern Irish authorities?
10 **A.** Not as far as I know, because it was with the
11 Investigation Team, so the -- I presumed it would be the
12 Investigation Team who would need to make that -- you
13 know, they would be the gatekeepers of that.
14 **Q.** Are you aware of the Investigation Team having informed
15 the devolved authorities that there was this concern
16 about continuing prosecutions?
17 **A.** No, I'm not aware of that.
18 **MR BLAKE:** Thank you very much, those are all the questions
19 I ask.
20 We have some very brief questions from Mr Stein,
21 Ms Page and Ms Dobbin. They've assured me that they're
22 only going to be five minutes each.
23 **SIR WYN WILLIAMS:** Before they ask their questions, there's
24 just one thing I'd like to go back to. Could we have
25 the note of the conference with Mr Altman of 9 September
40

1 2013.

2 **MR BLAKE:** Yes, that's POL00006485.

3 **SIR WYN WILLIAMS:** Through you and Ms Crichton, Mr Blake, is

4 there any indication in that consultation -- I should

5 say -- note, that the advice relating to Mr Gareth

6 Jenkins was discussed?

7 **MR BLAKE:** I don't know the answer off the top of my head.

8 I'm sure we can find an answer to that, though, sir.

9 **SIR WYN WILLIAMS:** All right. If you would, please.

10 Then -- and I'm sorry I'm having to do this from

11 memory -- but in the email chains which preceded that

12 conference, my recollection is that I think it was

13 a solicitor from Cartwright King asked that the advice

14 by Mr Clarke, about Gareth Jenkins, be sent to

15 Mr Altman.

16 **MR BLAKE:** Yes, so that's POL00337138.

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

18 **MR BLAKE:** It is the bottom email. Well, this may be

19 a wrong reference from me or we may be talking about the

20 same document but it's not necessarily the same advice.

21 If we look at the bottom email, there's an email from

22 Mr Parsons that says, "I'll forward Cartwright King's

23 note on to Brian". But that, I think, is Mr Bowyer's

24 note, rather than --

25 **SIR WYN WILLIAMS:** Yes, I think Mr Bowyer wrote an email

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Questioned by MS DOBBIN

1 **MS DOBBIN:** Ms Crichton, I ask questions on behalf of Gareth

2 Jenkins.

3 The Inquiry has seen a note dated 2 September

4 2013 -- I won't bring it up on screen -- but it records

5 a -- well, it's notes of a conversation between

6 Mr Rodric Williams and Mr Smith of Cartwright King. The

7 handwritten notes indicate that it was said at that

8 point in time that it wasn't thought that Mr Jenkins had

9 been advised of his expert duties and the question was

10 asked "What were we doing to instruct GJ?"

11 Can I ask whether you were made aware in September

12 2013 that either Mr Jenkins hadn't been instructed about

13 expert duties or that there was a serious question as to

14 that?

15 **A.** I don't think I was.

16 **Q.** Would you have regarded that as significant information

17 and information that you ought to have been provided

18 with?

19 **A.** Yes, I think that's correct.

20 **Q.** Why is that?

21 **A.** Because it would obviously be part of our responsibility

22 as a prosecutor and then, going forward, in terms of

23 Cartwright King, it would have been part of their

24 responsibility, as well, to ensure that that was done.

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1 suggesting that Mr Clarke's advice be sent, and I wanted

2 to check I was right about that, before asking the

3 question that want to ask Ms Crichton. I tell you what,

4 let the --

5 Well, let me ask you the direct question,

6 Ms Crichton. Can you remember whether or not the advice

7 written by Mr Clarke about Mr Gareth Jenkins was sent to

8 Mr Altman as part of his instructions for that

9 consultation?

10 **A.** I think it was and, in his interim note of early

11 September, I think he refers to Gareth Jenkins' expert

12 evidence, the need for disclosure, which then tees up

13 a discussion around the conflict of interest point.

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

15 **MR BLAKE:** Sir, if I could bring on to screen POL00006583.

16 **SIR WYN WILLIAMS:** Yes.

17 **MR BLAKE:** It's paragraph 1(2) and Mr Altman's note. This

18 advice is --

19 **SIR WYN WILLIAMS:** Yes, thank you very much.

20 **MR BLAKE:** -- 2 August 2013.

21 **SIR WYN WILLIAMS:** Yes, thank you. I have traced down what

22 I wanted to know. Thank you very much.

23 Right, over to those who are asking their five

24 minutes worth of questions.

25 **MR BLAKE:** I think we'll start with Ms Dobbin.

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1 **Q.** So, in other words, you would have understood that it

2 would have gone to much broader questions about the

3 competency of POL prosecutors and those who were

4 conducting prosecutions on behalf of Post Office?

5 **A.** I'm not sure I would have done at that stage, no.

6 **Q.** Do you think that you would have needed further advice

7 in order to understand that?

8 **A.** It's hard to put myself back in that position now.

9 Probably, yes.

10 **Q.** This was the position in September 2013, can we take it

11 that you were never apprised of that information?

12 **A.** That's my recollection.

13 **Q.** Can we also take it that Mr Altman wasn't provided with

14 that information either, when he came to provide advice

15 to Post Office, as we've seen?

16 **A.** I'm afraid I can't help you there because he -- I can't

17 help you. I don't know the answer to that question.

18 **MS DOBBIN:** Thank you.

19 **SIR WYN WILLIAMS:** Thank you, Ms Dobbin.

Questioned by MR STEIN

20 **MR STEIN:** Ms Crichton, my name is Sam Stein, I represent

21 a large number of subpostmasters/mistresses and

22 employees at branches.

23 I've got two topics I want to ask you about, the

24 first one relates Second Sight and then the second one

25

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1 I want to ask you about is then your leaving the Post
2 Office, okay? All right.
3 Now, you've been asked number of questions today by
4 Sir Wyn, Chair of the Inquiry, about the Clarke advices
5 and what happened in relation to them in terms of
6 discussions with the Board. Can I then turn that around
7 to discussions with Second Sight about the Clarke
8 Advices. So the Jenkins advice, did you bring that to
9 the attention of Ron Warmington at Second Sight or Ian
10 Henderson at Second Sight?

11 **A.** So I can't remember but, on one of the transcripts,
12 they're talking about how good Mr Jenkins is as
13 an expert witness and I have a feeling -- and it's only
14 a feeling -- that I did mention it to Second Sight but
15 whether it was in terms, I don't know.

16 **Q.** Okay. Now, obviously, there's going to be evidence
17 given from I think Mr Warmington later in the Inquiry,
18 so we can talk to him about that and his recollection.
19 Can I just tease out a little bit more in relation to
20 that.

21 One of the matters that is important about the
22 Jenkins Clarke Advice, do you agree, is that Mr Gareth
23 Jenkins is not just someone who was providing evidence
24 under the label of "Expert" for Fujitsu but also someone
25 who was a principal architect of the Horizon system; do

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1 **Q.** You knew him, in fact, from that background to be
2 a thorough and deep digger in relation to matters in
3 which he is engaged; is that fair?

4 **A.** That's correct and, in addition, one of my colleagues at
5 GE Consumer Finance was Chief Compliance Officer, Jane
6 Wexton, and she'd worked with him at Citibank.

7 **Q.** So it came to the position in relation to the Post
8 Office that the Post Office had instructed I think three
9 out of probably the four big audit-type firms in the
10 past; is that right? KPMG, that sort of firm?

11 **A.** I can't remember but, yes, probably.

12 **Q.** There was a need to ensure that the team that was
13 brought in to do the Second Sight job that it did, was
14 going to be acceptable to MPs, Mr Arbuthnot, now
15 Lord Arbuthnot, is that right, and others?

16 **A.** Those were the instructions given to me by the Chair at
17 the time.

18 **Q.** Okay. Now, Mr Warmington is someone with the attributes
19 that you've described, in other words thorough and deep
20 diver, in terms of his expertise. Did you expect
21 Mr Warmington to do an unexpectedly thorough job?

22 **A.** No, he did the job I expected him to do.

23 **Q.** Which is to be thorough?

24 **A.** Yes.

25 **Q.** Yes. So it went from your recommendation in relation to

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1 you agree? So it's two things about Mr Jenkins that's
2 important?

3 **A.** I hadn't -- yes, if you put it like that, I think that's
4 obviously correct.

5 **Q.** Because Mr Jenkins is someone that's been embedded in
6 the system, the Horizon system, from the word go and
7 also dealt with bugs, errors and defects within the
8 system; do you agree?

9 **A.** That's certainly the evidence that I have seen.
10 I wouldn't have said it was my -- I wouldn't have
11 characterised it in that way, probably, in 2013.

12 **Q.** But you agree with that now?

13 **A.** Yes, I think, again, with hindsight.

14 **Q.** All right. Now, can I then turn to the instruction of
15 Mr Warmington at Second Sight. Now, if I've got this
16 right, you worked at General Electric in increasingly
17 senior positions for what, six/seven years?

18 **A.** Eight in the end, yeah.

19 **Q.** Eight years. During that time at General Electric, you
20 worked with Mr Warmington; is that correct? He was
21 a fraud specialist?

22 **A.** So Ron Warmington was a part of the Global Fraud Team,
23 I think, and he -- so he also provided, if you like,
24 a service for us in EMEA and he worked on two cases with
25 me.

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1 Mr Warmington. At that point, had he actually set up
2 the firm Second Sight Limited, SSL?

3 **A.** So if I can actually take a step back, I actually rang
4 Ron Warmington to ask him for suggestions because
5 I thought he'd retired and I thought, you know, he might
6 know somebody who could deliver on this brief because
7 he's much more knowledgeable in that area of forensic
8 investigation than I was. And he said well he --
9 I can't remember whether he said he was going to but he
10 said he had this firm called Second Sight with Ian
11 Henderson.

12 **Q.** Right, and Ian Henderson, equally, is someone that
13 turned out to be very good at the detail?

14 **A.** Yes, I think if you look at his CV, that's what you
15 would expect.

16 **Q.** So Ms Perkins and Ms Vennells, they hadn't had this
17 knowledge of Mr Warmington as being this sort of, you
18 know, very thorough get to the detail type but they
19 nevertheless interviewed him; is that right?

20 **A.** That's correct and, although you have said and other
21 people have said I recommended him, I don't think I did.
22 I think I was neutral and said "This is their
23 presentation", and -- because I also knew Ron Warmington
24 and Ian Henderson, and they made it clear to me they
25 wouldn't take on the role if Post Office wasn't prepared

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1 to commit to giving them access to the information that
 2 they would need.

3 **Q.** Do you recognise now, Ms Crichton, that the instruction
 4 of Mr Warmington and bringing with him Mr Henderson was
 5 a turning point, in other words that they did their job,
 6 they got as deep as they could do? We know what
 7 happened. Eventually, their services were let go by
 8 Post Office. But they did what they could in the time
 9 that they had; do you accept that that was a turning
 10 point in these events?

11 **A.** Yes, I think that's right.

12 **Q.** Without that, that stepping stone, we probably wouldn't
 13 have had the information available for the High Court
 14 litigation, and so on?

15 **A.** Mm-hm.

16 **Q.** Do you agree with that?

17 **A.** Yes.

18 **Q.** Now, one last thing in relation to your resignation.
 19 You deal with that in your statement at page 100. Did
 20 it come to the point where doors were being closed to
 21 you so that your access was being increasingly limited
 22 within your role as General Counsel and that led to your
 23 resignation?

24 **A.** I think, as I said, and I think, you know, the quotes
 25 from the meetings yesterday, I felt I could no longer

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1 **Q.** Have you been released from that now?

2 **A.** I hope so.

3 **MR STEIN:** Thank you, Ms Crichton.

4 **SIR WYN WILLIAMS:** Can we fit in Ms Page before a break?
 5 I'm conscious of the transcriber; how do you feel?

6 **MR BLAKE:** Sir, I would very much like to because we do have
 7 to move on to the next witness.

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

9 **Questioned by MS PAGE**

10 **MS PAGE:** Thank you, Flora Page.
 11 Can I take you to the January 2012 Board, please.
 12 POL00021503 at page 6. Down to page 6, please, and if
 13 we scroll down a bit, we see that there's reference to
 14 Susan Crichton, if we hold on there, please.
 15 So "Significant Litigation Report":
 16 "Susan Crichton explained that the subpostmasters
 17 were challenging the integrity of the Horizon system.
 18 However the system had been audited by RMG Internal
 19 Audit with the reports reviewed by Deloitte's. The audit
 20 report was very positive."
 21 Then, skipping over the claim about criminal
 22 prosecutions, you suggested that you clear the audit
 23 report with the external lawyers and, if possible, give
 24 the report privileged status and circulate it to the
 25 Board.

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1 perform my job, and it's partly because, when you lose
 2 confidence of the Chair, the Board, the CEO, you can't
 3 stay as General Counsel. So it's sort of more than
 4 doors closed; it's you just don't have a right of
 5 audience, if you will. You're discredited and, once
 6 you're discredited as a lawyer, an in-house lawyer, you
 7 can't operate.

8 **Q.** From your point of view, the document that was a note of
 9 a meeting with you at coffee shop, it refers at one
 10 stage to you perhaps putting professional ethics above
 11 maybe the interests of the Post Office. Is that
 12 something that you recognise, that you're someone that
 13 tried, with the mistakes that you've accepted, to put
 14 your professional duties properly at the front?

15 **A.** Yes, I did. I did try to do that, yes.

16 **Q.** Do you feel coerced? Is that too strong a word?

17 **A.** I just was put in a position where I couldn't do my job.
 18 You know, I just couldn't -- I couldn't -- I just
 19 couldn't continue to do my job because I couldn't
 20 deliver on it.

21 **Q.** Because there was no other option and you resigned --

22 **A.** Yeah.

23 **Q.** -- is that fair? When you resigned, did you sign
 24 an NDA, a non-disclosure agreement?

25 **A.** A settlement agreement, which included an NDA, yes.

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1 So thank you, that can come down. Ms Crichton, can
 2 you please take it from me, given our time constraints,
 3 that that internal audit report, reference POL00029114,
 4 was circulated to you and, in fact, it said this,
 5 amongst other things:
 6 "It is difficult to detect and prevent inappropriate
 7 changes being made to master data."
 8 That was referring to Fujitsu and saying that there
 9 were problems with the controls around how you accessed
 10 master data. That had built on and responded to Ernst &
 11 Young reporting on the same issue in March 2011, and
 12 this internal audit report, as at January 2012, said
 13 that none of the problems around controls that had been
 14 highlighted by Ernst & Young the previous March had been
 15 resolved.
 16 So March 2011, Ernst & Young say serious problems
 17 around controls and accessing master data at Fujitsu.
 18 Come January 2012, RMG Internal Audit say they're still
 19 not resolved, none of them.
 20 In the aftermath of your January 2012 Board, you've,
 21 according to emails, made sure that Alice Perkins
 22 received that RMG Internal Audit report. In the
 23 process, contrary to what your remarks to the Board
 24 suggested, it's discovered that Deloitte's involvement
 25 is not something separate, there is no separate report

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1 from Deloitte's. In fact, there is just a Deloitte's
2 secondee who's worked on the RMG report, all right? So
3 no Deloitte's external report; Ernst & Young, nothing
4 resolved; RMG Internal Audit, still some serious flags
5 and question marks.

6 That internal audit report is then put into the
7 April Board papers, just after your Significant
8 Litigation Report for April Board, but you don't correct
9 anything of what you said in January. Now, do you have
10 any recollection of this, as to why it would be that you
11 didn't correct a board, any of these issues that, in
12 fact, were very live and very problematic?

13 **A.** No, I'm afraid I don't.

14 **Q.** Well, then just lastly this, and see if this helps to
15 jog your memory at all: in May 2012, there was
16 a briefing prepared and, if we bring that up, please,
17 it's POL00033825, and I believe that you've had a look
18 at this because this was part of your papers and you
19 deal with it in your statement. This is a pack for
20 James Arbuthnot and Oliver Letwin and, elsewhere in this
21 pack, we can see that it was a meeting at which Paula
22 Vennells, Alice Perkins, who we know from the email
23 I just referred to, had received the RMG Internal Audit
24 report and, indeed, the whole board had received it by
25 now in the April papers, and also Lesley Sewell, were

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1 the PCI audit, there's the VocaLink, and there are
2 number of other independent audits, but the issue really
3 is that those audits look at different things. So I'm
4 not trying to excuse it, but I think it's like trying to
5 compare apples and pears, so those audits wouldn't
6 necessarily be general -- wouldn't necessarily look at
7 your point around master data.

8 So I'm not saying that that's necessarily wrong, for
9 instance Ernst & Young carrying out an annual financial
10 systems audit, and that's what drives the issues flagged
11 in the management letter.

12 I think also, with regard to the management letter,
13 there was an element of progressing towards getting
14 things done, as well as things that hadn't been done.

15 **Q.** But wouldn't you accept that putting it in this format,
16 and this being a sort of a briefing which is trying to
17 give the MPs a sense that everything is okay, the
18 suggestion is that these external checks are telling the
19 world, Post Office, RMG and these MPs "You don't have
20 anything to worry about"?

21 **A.** I think it says what it is. You know, it's audits are
22 done by people like PCI, VocaLink, Worldpay, HSBC
23 Payment Systems, and they give that accreditation.
24 So -- and also we'd had -- I'm not sure we'd have had it
25 by then, but the SAS70, or it might be -- it's not ISO.

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1 all involved with this. On page 12, if we go down to
2 page 12, we see "External Scrutiny":

3 "Horizon and Post Office systems environment have
4 always been subject to external scrutiny for both
5 assurance and accreditation purposes. Ernst & Young
6 carry out an annual financial systems audit;
7 an independent auditor also carries out a yearly audit
8 ..."

9 We'll skip a bit down, please, and then the last
10 bit:

11 "In addition to these rejected already audits [final
12 sentence on the page], *ad hoc* independent audits of the
13 system are initiated by Royal Mail Group and supported
14 by Post Office Limited."

15 So this is one after the internal audit report had
16 been put into the board pack, in which it was clear that
17 the Ernst & Young issues raised in the previous year had
18 not been resolved and there were still some serious
19 concerns around Fujitsu's control of master data. Why
20 were the MPs being told that all was hunky-dory and
21 external scrutiny was fine?

22 **A.** So I think what this paragraph says is that there are
23 number of audit processes which are carried out in
24 relation to the Horizon and other financial systems in
25 the Post Office. The reference presumably -- so there's

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1 So there are various ways of looking at the financial
2 systems and I think what this does is list what is done
3 but I suppose what I would say is that you need to be
4 quite in the detail to understand what it's really
5 telling you.

6 **Q.** What do you think James Arbuthnot and Oliver Letwin
7 would have felt differently, at that time, if they'd
8 been told that, in fact, Ernst & Young and the RMG
9 Internal Audit were raising serious question marks over
10 Fujitsu's controls of master data? Do you think they
11 would have been as happy with the way things were going
12 or not?

13 **A.** I can't speculate on that. I don't know.

14 **MS PAGE:** Thank you. Those are my questions.

15 **SIR WYN WILLIAMS:** Thank you, Ms Page.

16 So that's it, is it, Mr Blake?

17 **MR BLAKE:** It is, sir. Unless you have any questions?

18 **SIR WYN WILLIAMS:** No.

19 Well, thank you very much, Ms Crichton, for your
20 detailed witness statement and for giving evidence to me
21 for longer than one day. I'm grateful to you for
22 participating in the Inquiry in this way.

23 **MR BLAKE:** Thank you very much, sir, if we could take our
24 ten-minute break now and return at 11.25, please.

25 **SIR WYN WILLIAMS:** Certainly.

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1 **MR BLAKE:** Thank you very much.
 2 (11.13 am)
 3 (A short break)
 4 (11.25 am)
 5 **MR STEVENS:** Good morning, sir, can you see and hear us?
 6 **SIR WYN WILLIAMS:** Yes, I can.
 7 **MR STEVENS:** Thank you.
 8 **SIR WYN WILLIAMS:** Before you start, I was wondering
 9 whether, because we've proceeded as we have this
 10 morning, in order to achieve a reasonable break, rather
 11 than trying to fit ten minutes in between now and 1.00,
 12 we could carry on until, say, about 12.35, 12.40 and
 13 then just take lunch then?
 14 **MR STEVENS:** I'm content with that. I'm just looking at the
 15 transcriber.
 16 Yes, we'll proceed on that basis, thank you.
 17 **SIR WYN WILLIAMS:** Fine. Thank you.
 18 **MR STEVENS:** If I may call Mr Aujard.
 19 **CHRISTOPHER CHARLES AUJARD (sworn)**
 20 **Questioned by MR STEVENS**
 21 **MR STEVENS:** Please can you state your full name?
 22 **A.** Christopher Charles Aujard.
 23 **Q.** Thank you for giving your evidence to the Inquiry today.
 24 You should have a bundle of documents and a witness
 25 statement in front of you. Can I ask you to turn that

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1 **A.** Yes.
 2 **Q.** Just over halfway down, the word "management" appears at
 3 the start of the line in quotation marks. The start of
 4 that sentence is "Normally I would understand
 5 'management' to include the Board", and I understand you
 6 want to insert a "not" so it reads "Normally I would
 7 understand 'management' not to include the Board"?
 8 **A.** Correct.
 9 **Q.** The final typographical one -- sorry, again, I've gone
 10 out of order -- is page 150, paragraph 272. I think we
 11 can all see what it is already: "In other words, as at
 12 3 June 2024", that should be "2014"; is that correct?
 13 **A.** Correct.
 14 **Q.** I think that concludes the typographical changes. If we
 15 could now turn, please, to page 42, paragraph 87. This
 16 sets out that:
 17 "To the best of my recollection, I did not authorise
 18 any prosecutions during my time at [Post Office Limited]
 19 and, as it would have been an unusual course of action
 20 for me professionally, I believe it would have been
 21 something I would remember had I done so."
 22 I understand you want to make a clarification to
 23 that, following receipt of further documents from the
 24 Inquiry, which you did not have when you drafted the
 25 statement?

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1 up, please. Do you have a witness statement dated
 2 15 March 2024?
 3 **A.** I do.
 4 **Q.** And that witness statement runs to 398 paragraphs; is
 5 that the one you have?
 6 **A.** It does.
 7 **Q.** For the record, that is document reference WITN00030100.
 8 Before moving to ask you to confirm the contents of that
 9 statement, I understand there are four changes you wish
 10 to make to it, three of which are typographical and one
 11 is more substantive. We'll go through the typographical
 12 ones first.
 13 If we could have the statement on the screen,
 14 please, page 150, paragraph 272 -- I'm sorry, actually,
 15 I've taken that out of order.
 16 Page 65 first and if we could have paragraph 120
 17 yes, thank you. About six lines down in brackets it
 18 says "usually me, our civil litigation lawyer, Rod
 19 Williams, Ms van den Bogerd and Ms Crowe". I understand
 20 you wish to strike out "our civil litigation lawyer Rod
 21 Williams", and then add, at the end of "Ms Crowe", "and
 22 more occasionally Rod Williams, our civil litigation
 23 lawyer"; is that correct?
 24 **A.** Correct.
 25 **Q.** Could we then turn, please, to page 166, paragraph 298.

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1 **A.** I do.
 2 **Q.** Could. Make that clarification please?
 3 **A.** The full sentence should now read:
 4 "To the best of my recollection, I did not authorise
 5 any prosecutions during my time at POL that was based on
 6 evidence derived from the Horizon system and any
 7 references in this statement to a moratorium on
 8 prosecutions is confined to Horizon based prosecutions,
 9 unless stated otherwise. I am aware that, towards the
 10 end of my time at POL, November 2014, I gave approval to
 11 Jarnail Singh to instruct Cartwright King to proceed in
 12 the case of Singh and Kaur, a case of theft that did not
 13 involve Horizon issues. This case was heard in the
 14 Rotherham Magistrates' Court on 22 January 2015 and
 15 should not be confused with a similarly named case
 16 brought in the Midlands in 2009."
 17 **Q.** Thank you. So with those changes in mind could I ask
 18 you, please, to turn to page 217 of your statement.
 19 **A.** Yes.
 20 **Q.** Is that your signature?
 21 **A.** Yes, indeed.
 22 **Q.** Bearing in mind the changes you just made, are of the
 23 contents of your statement true to the best of your
 24 knowledge and belief?
 25 **A.** Yes, indeed.

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- 1 Q. That stands as your evidence in the Inquiry. It will be
2 published on the website shortly. I am going to ask you
3 some questions about it now. Before I do, I understand
4 you'd like to say a few words?
- 5 A. Yes, I want to say -- so I'll start by saying how deeply
6 sorry I am to the subpostmasters, subpostmistresses and
7 Post Office employees for the anguish and suffering that
8 you and your families have had to endure. I know that,
9 for many people, many people here and for many of you,
10 this has come far too late but I hope that the evidence
11 that I can give today will help get to the heart of what
12 has happened and, in so doing, I hope that that will
13 stop something like this from ever happening again.
14 Thank you.
- 15 Q. Thank you, Mr Aujard.
16 I'll start briefly with your background. You were
17 admitted as a barrister and solicitor of the Supreme
18 Court of Victoria in Australia?
- 19 A. That's correct.
- 20 Q. You were admitted to the roll of solicitors in 1992 --
21 the roll of solicitors in England and Wales?
- 22 A. Correct.
- 23 Q. You practised as a solicitor for eight years before
24 transferring to become an in-house lawyer?
- 25 A. Correct.

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- 1 General Counsel?
- 2 A. As I say in my statement, the understanding was
3 primarily to ensure that the Board and the officers and
4 employees of POL were informed of legal matters to the
5 extent that they needed to be or it was necessary for
6 them to fulfil their roles, and that I also, at the same
7 time, was responsible for managing a department of
8 lawyers who were, likewise, providing legal advice to
9 POL.
- 10 Q. If I could ask you just to raise your voice and maybe
11 come closer to the microphone.
- 12 A. I'm sorry.
- 13 Q. No need to apologise. In advising on legal matters and
14 legal risk, would you accept that a General Counsel
15 should be proactive in identifying areas of legal risk?
- 16 A. Yes, indeed, yes.
- 17 Q. Do you accept that the following areas fell within your
18 area of oversight: firstly, the Security and
19 Investigations Teams at Post Office Limited?
- 20 A. Not as a legal matter but, as an executive matter, the
21 Head of the security team reported to me, yes.
- 22 Q. Why was it not a legal matter?
- 23 A. He was not a lawyer and the activities he undertook were
24 concerned mainly with the safekeeping of physical assets
25 of the Post Office, which I wouldn't describe as a legal

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- 1 Q. Before joining the Post Office, your principal areas of
2 practice were Financial Services law and regulation and
3 mergers and acquisitions?
- 4 A. That's correct.
- 5 Q. You joined the Post Office Limited as Interim General
6 Counsel on 14 October 2013?
- 7 A. Correct.
- 8 Q. You held a series of fixed-term contracts with the Post
9 Office until you left in March 2015?
- 10 A. Correct.
- 11 Q. I want to start with your role as General Counsel. You
12 say it was Interim General Counsel but, while you were
13 in that position, you effectively had the role of
14 General Counsel at Post Office Limited?
- 15 A. I had carriage of that role for the period I was there,
16 on the basis I would be replaced by a permanent
17 successor.
- 18 Q. We don't need to turn it up, in your witness statement,
19 for the record, paragraph 32, you say that, necessarily,
20 an Interim General Counsel's role differs somewhat from
21 that of a permanent General Counsel, particularly in
22 regard to executive matters. You describe it somewhat
23 of a caretaker role, I think it's fair to put it?
- 24 A. That's correct.
- 25 Q. What was your understanding of your responsibilities as

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- 1 matter.
- 2 Q. Were you responsible for the Post Office's review of
3 past convictions of subpostmasters for theft, fraud and
4 false accounting?
- 5 A. So the answer to that question is that the review had
6 been initiated prior to my joining the Post Office and
7 I received, I believe, from recollection, updates as to
8 how that was progressing. It was subject to oversight
9 by Brian Altman KC and I took steps to assure myself
10 that the review was going appropriately.
- 11 Q. Brian Altman KC was a member of the independent bar,
12 yes?
- 13 A. Correct.
- 14 Q. Not a member of Post Office Limited?
- 15 A. Correct.
- 16 Q. In terms of the Executive Team, who had oversight within
17 Post Office Limited, did that fall within your remit?
- 18 A. Yes, it would have done, yes.
- 19 Q. In your statement, you distinguish between risks to Post
20 Office Limited arising from allegations made about the
21 Horizon IT System and the risk of any underlying issues
22 with the robustness of the system. Would you accept
23 that they are connected?
- 24 A. Yes, indeed. From my perspective, the -- an allegation
25 relating to the Horizon system could arise in

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1 circumstance where there was an underlying fault with
 2 that system.

3 **Q.** Would you accept that you had to have an understanding
 4 of whether or not Horizon was robust in order to perform
 5 your role as General Counsel?

6 **A.** The answer to that question is somewhat because the
 7 system itself an IT finance accounting system and I'm
 8 not qualified, clearly, to opine on accounting issues,
 9 finance issues, or IT issues. However, as part of the
 10 process, I believe I needed to understand, in a general
 11 sense, the types of concerns -- areas in which concerns
 12 might be raised but not have an understanding at any
 13 level of detail as to the fundamental operation of that
 14 system.

15 **Q.** But if there was, say, an issue identified by
 16 a technical specialist, an issue with the Horizon IT
 17 System, you would agree that it would be important for
 18 you to know about that?

19 **A.** As I think I say in my witness statement, in
 20 circumstances where that gave rise to an allegation and
 21 that allegation was one which was -- had some degree of
 22 legal implication, ie not simply an allegation relating
 23 to the font or colour of a particular statement but
 24 something which had a legal connection, in investigating
 25 or in considering the legal component allegation,

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1 relied on the a variety of sources of advice from
 2 external legal advisers. Of course, you, being General
 3 Counsel, were put in a position to provide the company
 4 with legal advice yourself, correct?

5 **A.** Correct.

6 **Q.** So, if you received legal advice from an external
 7 source, it would be your responsibility to read it,
 8 correct?

9 **A.** If it's a legal advice that relates to a matter that
 10 I've commissioned, yes. The Department as a whole
 11 received legal advice on a daily basis from many
 12 different sources and that advice I would not normally
 13 read. So, for example, advice in relation to the
 14 procurement of the IT system was being dealt with by
 15 others in the team; that would not be advice I would
 16 review or be involved with.

17 **Q.** Yes, but if the advice came to you, you would be
 18 expected to read it?

19 **A.** In -- that is correct. Yes, that is correct.

20 **Q.** Whilst you may defer to an external lawyer or
 21 specialism, would you accept that you would try to
 22 critically analyse it and come to your own view on the
 23 advice itself?

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

25 **Q.** Can we bring up a document, please, POL00138077. So

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1 I would, believe, have to turn to and seek advice from
 2 the IT and Finance Teams as to the issues that were
 3 being complained about.

4 **Q.** So when, for example, you may have been dealing with
 5 claims by subpostmasters for compensation on the basis
 6 that the Horizon IT System was not reliable, when you
 7 were dealing with those, it would be important to know
 8 if an IT expert within the business had identified
 9 an issue with the underlying system?

10 **A.** The claims handling process was dealt with as part of
 11 the Mediation Scheme whilst I was at the Post Office, as
 12 part of the process that that scheme operated. Those
 13 complaints were investigated, to some extent. Those
 14 investigations, if they revealed issues relating to the
 15 system, then those issues would have been referred to
 16 technical specialists familiar with those, either in the
 17 IT Department, the Finance Team or, in a number of
 18 cases, those that dealt with Network matters. If, as
 19 a result of that, there was an underlying issue, it
 20 would have been considered as part of the scheme
 21 mediation process.

22 **Q.** Well, we'll come on to that and look at it in more
 23 detail in due course when we look at your role in the
 24 Mediation Scheme. You've referred to external advisers,
 25 namely Brian Altman KC, already and you say that you

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1 this is a presentation given on 17 January 2014
 2 regarding the Mediation Scheme. Can we please turn to
 3 page 4. In the top right, it says, "Core Membership";
 4 what is that describing?

5 **A.** I believe, but can't be sure, that that is describing
 6 the membership of the internal team that was responsible
 7 for providing support to the mediation process.
 8 However, I can see from that core membership list that
 9 that appears to be a point in time description of who
 10 was involved then. My recollection is that that
 11 subsequently changed after this document was prepared.

12 **Q.** One of the attendees listed is Andy Parsons and that's
 13 Andrew Parsons of, the name of the firm has changed, but
 14 now Womble Bond Dickinson, correct?

15 **A.** Correct.

16 **Q.** In your statement -- we don't need to turn it up, but
 17 it's paragraph 37.1, for the record -- you say Bond
 18 Dickinson was so embedded within POL that, in many ways,
 19 they acted as an extension of the in-house Legal Team.
 20 Can I ask here, what was Andy Parsons' role in respect
 21 of this scheme at this point?

22 **A.** I don't think there was a formal or a written document
 23 describing his role. He was, from the best of my
 24 recollection, involved in many, many important meetings
 25 relating to the operation of the scheme and also, as

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1 I said in my statement, he was a source of institutional
 2 knowledge about what had happened to the Post Office in
 3 order for the scheme to be established. So he was both
 4 a legal expert and provided legal support and advice,
 5 often written advice, institutional knowledge about
 6 matters that had occurred in the past, and attended
 7 many, many internal meetings.

8 **Q.** So when you said Womble Bond Dickinson were an extension
 9 of the in-house Legal Team, would that include Andy
 10 Parsons?

11 **A.** Principally Andy Parsons, I think so.

12 **Q.** Did his role, in your experience, go beyond that of
 13 an arm's length third party legal adviser?

14 **A.** Yes, he did provide advice on Bond Dickinson, I think
 15 now Womble Bond Dickinson, letterhead, unlike a secondee
 16 who was part of the team and has formal reporting lines
 17 into a company, his formal reporting line was and
 18 remained into Womble Bond Dickinson, and he was subject,
 19 I believe, to supervision and appraisals, performance
 20 reviews, by the appropriate partner at Womble Bond
 21 Dickinson, who's name, I'm afraid, I can't remember.

22 **Q.** The advice you received from Womble Bond Dickinson and
 23 Andy Parsons, was that limited to formal legal advice or
 24 did it include strategic and commercial advice?

25 **A.** It included legal advice, particularly in relation to
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1 referenced.

2 **Q.** When you say a "higher order matter", what do you mean?

3 **A.** So matters to do with the review of past cases and
 4 review of matters coming out of the Mediation Scheme was
 5 something that I referred to Cartwright King for.

6 **Q.** You've referred to Mr Singh being underoccupied. You
 7 were aware of his history as a prosecutor with Royal
 8 Mail Group and Post Office Limited?

9 **A.** Correct, yes.

10 **Q.** Did you ever discuss with Mr Singh whether he was aware
 11 of bugs, errors or defects in the Horizon IT System?

12 **A.** I've no recollection of any specific discussion with
 13 Mr Singh about that. However, it was a very small,
 14 open-plan office space. The matters that were being
 15 considered as part of the Mediation Scheme were well
 16 known within the Legal team, so I can't recall whether,
 17 at any particular time, I had a specific conversation
 18 with him or he had a specific conversation with me about
 19 bugs, errors or defects in the scheme -- in Horizon.

20 **Q.** Given his past history involving Horizon cases, do you
 21 think you would have asked him directly about bugs,
 22 errors or defects in the Horizon IT System and whether
 23 he was aware of them?

24 **A.** I believe that, as part of the general induction into
 25 the Post Office, I would have met every member of the
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1 the establishment of the scheme and the liability of
 2 subpostmasters -- sorry, the liability that the Post
 3 Office should bear under the scheme. It included advice
 4 that was strategic about how to approach matters and, to
 5 some extent, it also included advice based on his
 6 general knowledge of what had happened in the past.

7 **Q.** I want to start looking at the past convictions and
 8 start with your knowledge of criminal law. You say in
 9 your statement that you weren't well versed in the
 10 criminal law of England and Wales?

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

12 **Q.** You refer to Jarnail Singh; did you understand him to be
 13 well versed in matters of criminal law?

14 **A.** I believe I did when I joined. I thought that he had
 15 the technical expertise necessary to advise on matters
 16 of criminal law, yes.

17 **Q.** What did you think of his competence as a lawyer; were
 18 you satisfied or dissatisfied?

19 **A.** As I say in my statement, I believe I was satisfied at
 20 his core technical competence. My recollection is that
 21 he was not -- he was not someone I would go to for
 22 higher order matters, to do with complex criminal
 23 issues. My recollection is also that he was rather
 24 underoccupied for much of my time at POL because there
 25 were no prosecutions taking place, bar the one that I've
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1 team and talked to them about matters which were of
 2 relevance to them and I cannot recall, I'm afraid,
 3 whether there was any specific discussion with him about
 4 bugs, errors or defects.

5 **Q.** Can you recall anyone in the Legal team telling you of
 6 their own personal knowledge of bugs, errors or defects
 7 in the Horizon IT System?

8 **A.** No, indeed the opposite. I believe that when I joined
 9 the Post Office the message that I received, not just
 10 from the Legal Team but from other part of POL, were
 11 that there were no bugs, errors or defects, apart from
 12 the ones identified in the Second Sight Report.

13 **Q.** When you say "other parts of Post Office", what other
 14 parts?

15 **A.** So that would be principally from those involved in the
 16 Network, fellow members of the Executive Committee,
 17 and --

18 **Q.** Can you name names, please?

19 **A.** So the names -- I can't, I'm afraid, recall the names of
 20 everybody there. Kevin Gilliland would have been one,
 21 Angela van den Bogerd would have been another and
 22 they're probably the two principal ones, I think.

23 **Q.** Going back to your knowledge of criminal law, you've
 24 said that you were aware that -- I'm just going to say
 25 Post Office, even though there was a split.
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1 A. Yes.

2 Q. You were aware that Post Office had brought private
3 prosecutions in the past?

4 A. I was aware, in a general sense, of the prosecutions
5 being brought. Again, as I say in my witness statement,
6 I was very surprised -- very, very surprised -- when
7 I discovered it was done as part of a general power for
8 any corporation or individual to bring private
9 prosecutions.

10 Q. We'll come to that. Just taking it in stages: you were
11 aware that the Post Office prosecuted subpostmasters --

12 A. That's correct.

13 Q. -- for theft, fraud offences or false accounting?

14 A. Correct.

15 Q. Presumably, you were aware of the criminal standard of
16 proof, namely that the jury had to be sure of guilt to
17 convict?

18 A. Correct.

19 Q. You understood that Post Office owed duties of
20 disclosure when it prosecuted cases?

21 A. Correct.

22 Q. You understood that the Post Office was required to
23 disclose documents it possessed or had access to that
24 might reasonably be considered capable of undermining
25 the case for the prosecution or of assisting the case

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1 an expert witness.

2 Q. Let's look at POL00108136. That's POL00108136, page 2,
3 please. If we could start on the first page. Is this
4 the briefing note you were referring to earlier,
5 produced by Cartwright King?

6 A. Yes, indeed.

7 Q. If we could now go to page 2, thank you, and to
8 paragraph 3. It says:

9 "To this end prosecutors have relied upon the
10 statements of both [Post Office Limited] Investigators
11 and, where expert evidence is required, that of Fujitsu
12 Services Limited. In each case a formal statement (and
13 testimony, if required) explaining [Horizon Online] and
14 those functions of [Horizon Online] relevant to the
15 particular prosecution is provided by the Lead
16 Investigator. Where it is necessary to provide evidence
17 and testimony dealing with the integrity of [Horizon
18 Online] and/or to explain technical aspects of the
19 system and data, we have relied upon [it says Dr Gareth
20 Jenkins], an expert witness provided by Fujitsu."

21 Looking back now, do you think at the time you were
22 aware that written statements had been produced by
23 Gareth Jenkins?

24 A. It's quite possible I was aware of the written
25 statements at the time but I have no recollection now as

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1 for the accused?

2 A. Correct.

3 Q. You were aware that the Post Office owed a duty of
4 disclosure following conviction?

5 A. Correct.

6 Q. You were aware that Post Office relied on data generated
7 by Horizon to prove its case in those prosecutions --

8 A. Correct.

9 Q. -- and, as such, it was essential that the data
10 generated by Horizon was reliable in those prosecutions?

11 A. Correct.

12 Q. Did you know that, in some cases, Post Office Limited
13 had relied on expert evidence to demonstrate the
14 integrity of the Horizon IT System?

15 A. Yes, when I joined the Post Office, I was provided
16 a briefing, I believe, on my second day by Cartwright
17 King, outlining the matters you've just discussed and
18 the history of prosecutions and the issues that had been
19 raised in relation to Gareth Jenkins.

20 Q. So you were aware of Gareth Jenkins and you're aware
21 that the Post Office had served written statements from
22 Gareth Jenkins in some prosecutions relevant to the
23 integrity of the Horizon IT System?

24 A. I'm not sure I was aware that they were written
25 statements but I was aware that he'd been used as

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1 to whether it was written or oral expert evidence or
2 witness evidence that he was providing.

3 Q. You were aware, weren't you, that an expert witness in
4 a criminal trial owed a positive duty of disclosure?

5 A. Correct.

6 Q. And that duty consisted of or included a duty to inform
7 the prosecutor of any material that cast doubt on his or
8 her opinion or arguably assist the defence?

9 A. Correct.

10 Q. Thank you.

11 What, if any, knowledge do you have of the criminal
12 law of Scotland?

13 A. No knowledge of the criminal law of Scotland.

14 Q. What about Northern Ireland?

15 A. No knowledge of Northern Ireland.

16 Q. What was your understanding of Post Office's
17 prosecutorial policy in Scotland?

18 A. My understanding was that the prosecutions in Scotland
19 were brought by the Procurator Fiscal and that, in
20 Northern Ireland, a similar arrangement was in place
21 where the Post Office was not bringing its own private
22 prosecutions.

23 Q. How did you satisfy yourself that Post Office Limited
24 was acting in a compliant manner with the relevant laws
25 of Scotland in relation to criminal law and past

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1 convictions?

2 **A.** I believe at the time I joined, I had a meeting with --

3 or shortly after joining -- a meeting with both

4 Cartwright King and Sir Brian Altman KC, and my

5 recollection of those meetings is that they satisfied me

6 that there were no ongoing matters that required

7 positive attention by me or, indeed, by Post Office to

8 deal with jurisdictions outside of the ones that were

9 being dealt with. In other words, I would have had

10 a question and answer session with them and expected and

11 encouraged them, as the incoming new General Counsel,

12 with no knowledge of what had happened previously, to

13 identify any outstanding matters, recommendations or

14 actions that I should take, having newly arrived in that

15 post.

16 **Q.** So, in summary, is it fair to say, in respect of

17 Scotland and Northern Ireland, your understanding of

18 Post Office Limited's compliance with the laws of those

19 jurisdictions was entirely reliant on Cartwright King

20 and Brian Altman KC?

21 **A.** And, indeed -- I wouldn't say entirely reliant -- and,

22 indeed, on internal briefings I would have received from

23 others at the Post Office when I joined, to identify

24 issues that were currently live. There was no -- to the

25 best of my recollection, no such live issues were

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1 to paragraph 10, sorry. Thank you. It says:

2 "Dr Jenkins' failure to mention the [Horizon Online]

3 defects in his expert witness statements or to [Post

4 Office Limited] and [Post Office Limited] prosecutors

5 rendered his written statements inaccurate and

6 misleading. That failure amounted to a breach of

7 Dr Jenkins' duty to inform the defence and the court

8 (and [Post Office Limited]) of those matters -- see

9 paragraph 6 above. This was an important and

10 far-reaching failure the consequences of which are only

11 now beginning to crystallise. Of primary importance was

12 the fact that, had [Post Office Limited] been possessed

13 of this material during the currency of any particular

14 prosecution, it would have undoubtedly been disclosable

15 to the defence pursuant to [Post Office Limited's] duty

16 of disclosure."

17 It's quite a startling paragraph, isn't it?

18 **A.** Yes, it is.

19 **Q.** What were your views when you read it on the seriousness

20 of this issue?

21 **A.** I believe my views would have been informed by the

22 general briefing, which was that this was an historic

23 issue -- recently discovered but nonetheless historic

24 issue and that was being dealt with as part of the

25 overall process that had been put in place to review

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1 identified as and when I joined.

2 **Q.** Please can we bring up POL00006357. This is an advice

3 well known to the Inquiry, that of Simon Clarke, on

4 15 July 2013 concerning Gareth Jenkins. This advice was

5 provided to you with the Cartwright King briefing; is

6 that right?

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

8 **Q.** Did you read it when you received it?

9 **A.** I believe that I would have read -- I believe this is

10 an annex, one of six annexes, to a briefing note. I'm

11 sure that I would have reviewed the briefing note,

12 looked into the annexes for relevant issues and, to the

13 extent that they had been flagged, I would have followed

14 those up at the time. I cannot now recall whether

15 I read this in detail or simply by way of a "This is

16 a piece of background information you should be aware of

17 and, therefore, read it in that light".

18 I suspect, but don't know, it was more the latter

19 than the former, "Here is some background information

20 that you should be aware of but which does not contain

21 live issues".

22 **Q.** Let's go back to the briefing note, actually, if that's

23 what you read first. It's POL00108136, please. If we

24 could turn to page 10, please -- I'm sorry, I've given

25 the incorrect reference. Page 5, please, if we could go

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1 cases by Cartwright King with -- under the supervision

2 of Brian Altman KC.

3 **Q.** You said it was "historic". The middle sentence says,

4 "This was an important and far-reaching failure, the

5 consequences of which are only now beginning to

6 crystallise".

7 **A.** Mm-hm.

8 **Q.** Do you think that can sensibly be described as

9 "historic"?

10 **A.** The issue, the failure, I believe, is historic and

11 that's, I believe, how it was described to me at the

12 time: a recent historic failure, which will continue to

13 have implications for the Post Office in the future.

14 **Q.** Given the significance of this issue, do you think the

15 actual advice on which it was based, the Simon Clarke

16 Advice, is a background document or should you have read

17 it in close detail?

18 **A.** This the 16 July document.

19 **Q.** 15 July?

20 **A.** The 15 July document. I believed that, at the time,

21 when I received this briefing, that I was given

22 assurances that these issues, identified in this

23 briefing note, were now all being addressed.

24 **Q.** Who gave those you those assurances?

25 **A.** Well, my belief, which may of course be based on

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1 an incorrect understanding, would have been at the
 2 meeting I had in -- when I first joined the Post Office
 3 with Cartwright King, and I'm afraid I don't know the
 4 date of that meeting. Perhaps another way of expressing
 5 that is to say, when I joined the Post Office, with no
 6 knowledge of criminal law, there were no flags raised to
 7 me saying that there are ongoing matters that need to be
 8 addressed, other than the ones that are already being
 9 addressed as part of the review process being undertaken
 10 by Cartwright King and Brian Altman.

11 **Q.** So let's just break that down. Is what you're saying
 12 that there were issues in the past related to Mr Jenkins
 13 giving evidence, of which you were made aware?

14 **A.** Correct.

15 **Q.** That's what you're describing as historic?

16 **A.** Yes, correct, yes, yes.

17 **Q.** But the review remained ongoing?

18 **A.** Correct.

19 **Q.** Do you think the fact that Mr Jenkins was alleged to be
 20 in breach of his duty as an expert was something that
 21 ought to have been disclosed in itself?

22 **A.** At the time, I don't think I turned my mind to whether
 23 that needs to be disclosed.

24 **Q.** Why not?

25 **A.** The reason I believe that to be the case is that

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1 obtained more detailed answers.

2 At the time it seemed to me that I was being given
 3 a full and frank information briefing about matters that
 4 I, as a General Counsel -- incoming General Counsel
 5 needed to be alerted to and actions I needed to take.

6 **Q.** Why with hindsight? I mean, this was a matter of
 7 a review about past criminal convictions, wasn't it?

8 **A.** Correct.

9 **Q.** It was of the utmost importance?

10 **A.** Correct.

11 **Q.** This was, I think you accepted, a startling allegation
 12 that had been made?

13 **A.** Correct.

14 **Q.** Why did it require hindsight for you to say it was
 15 something you needed to turn your mind to?

16 **A.** The "with hindsight", I think, references the fact that,
 17 from the line of questioning, a discern that there was
 18 no such disclosure made and, if that's the case, then
 19 I'm very sorry that it's something that has turned out
 20 that way. At the time, however, I was firmly of the
 21 opinion that I had been told about all matters that
 22 I needed to take actions about.

23 So it was not something that was firmly or, to the
 24 best of my recollection, even indicated to me in a vague
 25 way that was an ongoing issue that needed addressing.

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1 I was -- received oral briefings from Cartwright King,
 2 from others in the Post Office, discussions with Jarnail
 3 Singh and in none of those discussions was it ever put
 4 to me that the fact that he was in breach of his duty
 5 was itself a disclosable matter or, if I had turned my
 6 mind to that issue, I believe that I would have thought
 7 that the review process that was being undertaken by
 8 Cartwright King, which was described to me as extensive,
 9 would be dealing with this type of disclosure matter.

10 **Q.** Let's start on whether or not you did turn your mind to
 11 it. I think your evidence was you didn't?

12 **A.** Correct.

13 **Q.** Do you accept that this matter fell squarely within your
 14 responsibilities as General Counsel --

15 **A.** Yes, indeed, yes.

16 **Q.** -- and the advice you received you ought to have
 17 approached critically and come to your own view on?

18 **A.** I don't believe that I would have been able to come to
 19 a view on the extent of disclosure obligations beyond
 20 that which was presented to me by Cartwright King.

21 **Q.** Would you accept that it was a mistake not to have
 22 turned your mind to this issue?

23 **A.** With the benefit of hindsight and knowing how events
 24 have developed since then, I accept that it is something
 25 that I could have pressed Cartwright King harder on and

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1 **Q.** Can we bring back up POL00108136, please. Back to
 2 page 5, please. Paragraph 8 describes the Helen Rose
 3 Report and it says, at the end -- it refers to an issue
 4 we don't need to concern ourselves with. The second
 5 point is:

6 "That issue was resolved: the importance of the
 7 report, however, was this: it was rather suggestive of
 8 the proposition that Dr Jenkins then knew of other
 9 Horizon issues related to events which occurred in
 10 January and February of 2013. The effect (if not the
 11 substance) of the report was to cast a further shadow
 12 over about the [Horizon Online] and those who had
 13 asserted its reliability in court documents and in
 14 court."

15 So one of the issues that's said to arise from the
 16 Helen Rose report is it further cast doubt on Gareth
 17 Jenkins; do you accept that?

18 **A.** Yes. Yes, indeed.

19 **Q.** Can we turn to paragraph 14, please. It describes the
 20 review process and it says:

21 "The purpose of the Review process was defined as
 22 being to identify those cases where, had we been
 23 possessed of the Second Sight and Helen Rose reports
 24 during the currency of the prosecution, would we have
 25 then been required to disclose some or all of that

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1 material to the defence."

2 Why did you think it was sufficient simply to
3 disclose those two documents and not to go further and
4 refer to the allegations made against Gareth Jenkins?

5 **A.** I don't believe that I did turn my mind to that. At the
6 time, this was given in the context of a briefing to me
7 as of current matters and, to the extent that there were
8 additional issues that needed to be raised, I would very
9 much have expected that Cartwright King bring that out
10 to me in a briefing in very clear terms.

11 **Q.** We'll move on to Mr Altman's advice starting with
12 POL00006581, please. So this is Brian Altman's advice,
13 general review of the review Cartwright King were
14 carrying out on 15 October 2013. That's the date of the
15 advice. Do you recall reading this?

16 **A.** Sorry, what was the date again?

17 **Q.** 15 October 2013.

18 **A.** So this would have been on my second day at the Post
19 Office. I do recall receiving the document on that day,
20 yes.

21 **Q.** If we go to page 5, please. We see there's an executive
22 summary and then, over the page at (x), Brian Altman
23 says:

24 "I agree that Gareth Jenkins is tainted and his
25 position as an expert witness is untenable. Thus, a new

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1 So you knew that piece of advice from Brian Altman?

2 **A.** Yes and, in general terms, I knew that Mr Jenkins was
3 tainted as a witness. That was made clear to me on
4 joining the Post Office.

5 **Q.** Can we go over the page, please, to paragraph 149. This
6 goes on to say that:

7 "As yet no new expert has been identified, far less
8 appointed, to replace Mr Jenkins, who is and was
9 uniquely placed to give evidence about Horizon, which is
10 an unhappy state of affairs about which little can be
11 done. The Jenkins problem, even when a new witness is
12 found, may not be at an end, because he will doubtless
13 still remain employed by [Fujitsu Services Limited], yet
14 not be asked to report on, or be called by [Post Office
15 Limited] as a witness to speak to, Horizon's integrity."

16 What did you understand of that advice at the time?

17 **A.** I understood it to say that he could not be relied upon
18 or used in the future. I'm not sure what I understood
19 by the reference to "he will remain employed by Fujitsu"
20 and I'm not sure what was meant by the reference "yet
21 not be asked to report on or called by POL as
22 a witness". However, I should stress, that's from
23 reading the document now. I have no clear recollection
24 of what I thought at the time when I read those words.

25 **Q.** Can you see that there may have been a concern that

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1 expert should be identified as soon as is practicable."

2 So Mr Altman had been asked to advise, effectively
3 provide a second opinion, on what Cartwright King had
4 said, yes?

5 **A.** Yes, as I understand it, yes, that's correct. That was
6 before my time, but yes.

7 **Q.** His advice was consistent or in agreement with
8 Cartwright King?

9 **A.** Yes.

10 **Q.** Can we turn, please, to page 45, and paragraph 141
11 onwards. We see Mr Altman is talking about failures of
12 an expert, with their obligations. You would have read
13 this section, presumably?

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

15 **Q.** Can we turn over the page, please, to paragraph 144.
16 Again, this says, on the Helen Rose report:

17 "In isolation, this may not mean much, but coupled
18 with the fact that it was Mr Jenkins who furnished the
19 information about the two defects to [Second Sight], it
20 lends itself to the reasonable interpretation that his
21 true level of knowledge about the integrity of the
22 system in general, and two defects in particular, was
23 far greater than he was prepared to reduce to writing in
24 his several witness statements during the material
25 period of time."

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1 a new witness or a new expert may be reliant on Gareth
2 Jenkins to provide their own evidence?

3 **A.** Yes, indeed. I can see that. Yes.

4 **Q.** Can you see how that could cause difficulties for
5 a prosecution going forward?

6 **A.** For future prosecution cases, that's correct, yes?

7 **Q.** Yes?

8 **A.** Yes, I can see that, for future prosecutions relating
9 on -- that were based on evidence derived from the
10 Horizon system, that would be an issue.

11 **Q.** And potentially derived from Gareth Jenkins?

12 **A.** And potentially derived from Gareth Jenkins, yes.

13 **Q.** Do you think that would have been your understanding of
14 this paragraph at the time?

15 **A.** I'm afraid I have no clear recollection of that
16 paragraph.

17 **Q.** Thank you. Can we please bring up POL00027150, and if
18 we could go to page 2., this is a paper for the Post
19 Office Audit, Risk and Compliance Committee, titled
20 "Prosecutions Policy". We can see, just to orientate
21 yourself, it's page 6 of the document. At the bottom,
22 please. Thank you. This was a report you prepared on
23 9 November 2013?

24 **A.** It would have been prepared by a number of people but my
25 name would have been put to it.

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1 Q. You would have had to satisfy yourself that it was
2 accurate?

3 A. Correct.

4 Q. Did you say "correct", sorry?

5 A. Correct, yeah, sorry.

6 Q. Was this one of the first reports you would have drafted
7 for a Board subcommittee?

8 A. I believe so. This is 8 November. I'd been in post for
9 about three weeks.

10 Q. Could we go, please, to page 2, paragraph 2.1, it says:

11 "In the last (October) CEO report to the Board,
12 an update was given on Project Sparrow in which it was
13 noted that '... a paper [will be submitted] to the
14 November ARC reviewing our overall policy for
15 investigating and prosecuting future cases'. For
16 convenience, a copy of the relevant section of that
17 report is set out at Appendix 1."

18 This is the update you were providing.

19 Can we go, please, to appendix 1 which is at page 7.

20 It says, "Project Sparrow" and the third bullet point
21 down refers to Cartwright King and the review of past
22 prosecutions. It says:

23 "Our external firm of criminal solicitors,
24 Cartwright King (CK), has now completed a review of 301
25 cases subject to past prosecution to identify whether we

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1 A. I would have thought that the paragraph has been written
2 in such a way to say -- to reflect my then understanding
3 that Cartwright King were dealing with all manner of
4 matters relating to past disclosures. Now, that
5 understanding may well have been incorrect but I don't
6 think that the wording there in any way indicates to the
7 contrary.

8 Q. Well, let me put it another way. When you came to draft
9 this report in November 2013, did you know whether the
10 Board or a subcommittee of the Board had been told of
11 the allegation that Gareth Jenkins was in breach of his
12 expert duties?

13 A. I'm not sure that I was aware at that time, no. I don't
14 think I was aware of what the Board had and had not been
15 told.

16 Q. Do you think you would have found that out when you were
17 preparing a report for a Board subcommittee?

18 A. I think that somebody -- I would have expected that to
19 have been brought to my attention, if it was the case
20 and if it was relevant to this paper.

21 Q. So you would have expected what to be brought --

22 A. I would have expected someone to say the board is or is
23 not aware of something and this is material, and they
24 should know. If they didn't know already.

25 Q. Was it not incumbent on you to find out what the Board

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1 have a duty to disclose the findings of the Second Sight
2 Report and associated issues."

3 What were the associated issues?

4 A. I'm afraid I've no clear recollection of what that
5 phrase referred to.

6 Q. Do you think it referred to Gareth Jenkins and the
7 allegations that he was in breach of his expert duties?

8 A. It may well have done. I believe, from my understanding
9 at the time when I joined the Post Office, that
10 Cartwright King were dealing with disclosure of all, of
11 all relevant matters to those that had previously been
12 convicted.

13 Q. If "associated issues" is referring to a matter such as
14 Gareth Jenkins and the allegation he breached his expert
15 duties, do you think the phrase "associated issues" is
16 doing a lot of heavy lifting there?

17 A. No, I don't think so. I think that is a reflection of
18 my general understanding of matters at that time. It
19 was -- I was dealing with all matters relating to the
20 disclosures and criminal cases.

21 Q. But as a report from the CEO, would you expect a matter
22 such as an allegation that an expert Post Office had
23 been relying on was in breach of their duties, matters
24 such as that, would you expect that to be described as
25 "associated issues" or said expressly?

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1 is or isn't aware of before you update them?

2 A. My understanding of being three weeks into the job was
3 I was heavily reliant on others to tell me what had gone
4 on previously. I don't believe that that issue was, to
5 the best of my recollection, ever drawn to my attention
6 in that stark manner.

7 Q. So you can't assist at this time with whether the Board
8 knew of, say, the 15 July Simon Clarke Advice?

9 A. I'm afraid I just don't know. I just don't know.

10 Q. Can we turn back, please, to page 2 and, if we go down
11 to paragraph 2.3 -- sorry, it should start at 2.2. It
12 says:

13 "Since that update, Brian Altman [KC] has prepared
14 two separate reports, one commenting on '[Post Office
15 Limited's] strategy and process for referencing past and
16 current criminal prosecutions in light of Second Sight's
17 Interim Report', [and it says] (the 'backward looking
18 report') ..."

19 That was the advice of Brian Altman we just went to,
20 wasn't it?

21 A. Mm-hm.

22 Q. Paragraph 2.3, it says:

23 "The headline conclusion of the backward looking
24 report is that the '... review [of the cases that have
25 been prosecuted over the last few years] is

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1 fundamentally sound' and that no 'systemic or
2 fundamental flaws in the review process' were detected.
3 In addition, a number of relatively small procedural
4 recommendations were made regarding matters such as
5 document retention etc."

6 Do you think that's a full and fair account of the
7 Brian Altman Advice, dated 15 October 2013?

8 **A.** I'm not sure that I'm -- without comparing -- looking
9 fully at the context in which this was prepared, I'm not
10 sure that I was able to comment on that.

11 **Q.** Well, let me put something particularly to you, then.
12 Why didn't you refer to the allegation against
13 Mr Jenkins when summarising this advice?

14 **A.** As I said before, my understanding, upon joining the
15 Post Office, was that all matters that had pre-dated my
16 joining, were currently being dealt with as part of
17 a review process undertaken by Cartwright King, with the
18 oversight of Brian Altman.

19 **Q.** But that's what was happening on the review, that's
20 a different matter to what the Board knew.

21 **A.** And I'm afraid I had no knowledge at that stage -- well,
22 I don't know whether I did or did not -- I had no
23 recollection of the Board's state of mind as to what it
24 had been told and what it hadn't been told upon joining
25 the Post Office nor, indeed, I would have thought, at

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1 well, I think you said the first day of your job or
2 second day, the Brian Altman Advice commenting on the
3 adequacy of the review?

4 **A.** Yes, and I believe the overarching take away from that
5 report is that the -- it is adequate.

6 **Q.** Just before we break, page 3, please, paragraph 2.7 and
7 2.8. I don't need to read it out but this refers to the
8 considerations about recovery when determining whether
9 or not to prosecute.

10 **A.** Mm.

11 **Q.** Were you aware, within the business, of discussions
12 about whether or not recovery of assets was a relevant
13 factor to take into account in whether or not to
14 continue Post Office's prosecutorial role?

15 **A.** I don't believe at that stage I was aware of discussions
16 within the business about the use of the Proceeds of
17 Crime Act to expedite recovery of assets but I was
18 concerned to make it clear to the -- I think this was
19 a committee paper -- the committee -- that that was not
20 something that should be taken into account.

21 **Q.** Can we turn the page, please. If you go to "Options
22 Considered", at the bottom, 4.3, please -- thank you --
23 there's four options set out for consideration there,
24 the last being "Ceasing all prosecutorial activity". If
25 we go over the page to page 5, paragraph 5.1, that's the

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1 that stage, which is about three weeks into the job.

2 **Q.** Do you think you should have referred to Brian Altman's
3 views on Gareth Jenkins or the Simon Clarke Advice in
4 this report?

5 **A.** I believe but can't be sure that my recollection there
6 is that -- let's put this another way. My working
7 understanding at the time was that these matters had
8 been all dealt with prior to my joining the Post Office
9 and that there had been a number of issues raised that
10 they'd gone through appropriate governance, appropriate
11 people informed and that steps were taken to deal with
12 them.

13 **Q.** But the review was ongoing?

14 **A.** Correct. The steps were taken to deal with them.
15 Correct.

16 **Q.** So was your position in respect of the review that it
17 had been set up and it was just to take its course?

18 **A.** That was my understanding when I joined.

19 **Q.** You weren't to look at that review critically and decide
20 whether or not it was satisfactory?

21 **A.** My understanding from those in the Post Office was that
22 it had been critically assessed and that it was adequate
23 and appropriate for the purpose it was trying to
24 perform.

25 **Q.** That's notwithstanding the fact that you received --

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1 proposal you recommended?

2 **A.** Correct. Option (d), which was to cease prosecutorial
3 activity but coupled with a Business Improvement
4 Programme.

5 **Q.** Why did you make that recommend?

6 **A.** So this is partly informed by both a personal view and
7 a professional view. As regards to professional view,
8 I did not believe that prosecuting was the appropriate
9 way for commercial organisations to deal with their
10 agents, their -- or their employees, for that matter.
11 My background context to that comment is I had come from
12 a Financial Services background where these types of
13 matters are usually dealt with in a civil court, or
14 dealt with by other means, certainly for lesser issues,
15 may be dealt with by means of an HR sort of process.
16 That's the professional view.

17 And the personal view, I felt that the criminal
18 prosecutions cause great distress and anxiety and didn't
19 have a place in a business such as the Post Office.

20 **Q.** To what extent did the difficulties faced by the
21 position of Gareth Jenkins as an expert influence your
22 recommend to cease prosecutorial activities?

23 **A.** Not at all. Not at all. I don't believe they
24 influenced by position at all. I think I would have
25 written the same words, had I not known about Gareth

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1 Jenkins.

2 **Q.** Before we break, you said earlier and in your witness
3 statement, you saw your role as one of caretaker,
4 insofar as executive decisions were carried out?

5 **A.** Correct.

6 **Q.** One of your first papers, I think, to a subcommittee,
7 was to advocate for the Post Office ending --

8 **A.** Correct.

9 **Q.** -- a centuries-old role in prosecutions; is it fair to
10 say you didn't shy away from making suggestions to
11 change executive policy?

12 **A.** In certain areas, I think that's correct. In general
13 terms, no. In general terms, it was to have carriage of
14 the direction of travel or take -- issue the direction
15 of travel the Post Office course was set upon. On this
16 particular issue, however, I felt very strongly and
17 that's why I put the words I did in that paper.

18 **MR STEVENS:** Thank you, sir. That's probably a good time to
19 take the lunch break, according to your indication.

20 **SIR WYN WILLIAMS:** Yes, certainly. So we'll start again at
21 1.40.

22 **MR STEVENS:** Yes, sir. Thank you.

23 (12.37 pm)

24 (The Short Adjournment)

25 (1.40 pm)

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1 ceasing prosecutions entirely but, when the matter was
2 discussed -- when that proposition was discussed at the
3 committee, Paula interjected or made the comment that
4 proposal (d), proposition (d), to cease everything
5 entirely, should not be taken as what I'd intended it to
6 be, "never bring prosecutions", but rather there should
7 be limited -- a limited prosecutorial activity, in that
8 Post Office should continue to take some prosecutions.

9 **Q.** Did that include prosecutions relying on Horizon data?

10 **A.** I don't believe it was specific at the time.

11 **Q.** Did she say what her basis was for that difference?

12 **A.** No, I'm afraid I've got no recollection of that meeting,
13 other than the limited recollection of that comment.

14 **Q.** Do you know if Paula Vennells was aware of the 15 July
15 2015 Simon Clarke Advice or the issues in it?

16 **A.** No, I'm afraid I don't know.

17 **Q.** Following this meeting did you inform anyone on the
18 board about the Simon Clarke advice of 15 July 2013?

19 **A.** No, I'm afraid that I had assumed that this advice had
20 been -- or at least the contents of it had been
21 communicated to the Board prior to my arrival.

22 **Q.** Is it the same for this Helen Rose report?

23 **A.** Yes, indeed, yes.

24 **Q.** Thank you. I want to now look at the review itself.
25 Can we go to POL00006581, please. It's back to Brian

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1 **MR STEVENS:** Good afternoon, sir, can you see and hear me?

2 **SIR WYN WILLIAMS:** Yes, thank you.

3 **MR STEVENS:** Thank you, I will carry on.

4 Please can we bring up page 201 of the witness
5 statement and the bottom, please, 363. Mr Aujard, just
6 before the break, you were discussing your paper to the
7 ARC Committee and your statement says:
8 "My note of 8 November 2013 was then discussed at
9 a meeting of the ARC on 19 November 2013."
10 You refer to there being concerns about a change in
11 policy of prosecutions:
12 "... 'raising questions on previous prosecutions',
13 and ... an obvious reluctance to cease prosecutions as
14 'in their view this acted as a deterrent'."
15 You say:
16 "I do have some (very limited) recollection of this
17 meeting, and of Paula Vennells resiling from what
18 I recall [Executive Committee's] view to have been in
19 the face of ARC's views, saying that the proposal was
20 not that [Post Office Limited] would 'never bring
21 prosecutions, but that [Post Office Limited] would be
22 more circumspect in the cases it chose to take' ..."
23 Could you just summarise what the difference of
24 opinion was between the ExCo and Paula Vennells?

25 **A.** So my recollection is that the ExCo were in favour of

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1 Altman KC's advice, which we went to at the start. Can
2 we turn to page 26, please, paragraph 71. We see that
3 Brian Altman advised that the proposed start date for
4 the review, 1 January 2010, was both a logical and
5 practicable approach to take. Do you remember reading
6 that?

7 **A.** I don't have a specific recollection of reading that but
8 I've reacquainted myself with it as part of this
9 process.

10 **Q.** Can we turn to page 42, please, and paragraph 130. It
11 refers to an earlier telephone conference, and says:
12 "... a question had been floated about the Falkirk
13 issue, as one example, as potentially bearing on the
14 Mediation Scheme. The Falkirk event was raised in the
15 *Misra* case. In the course of Gareth Jenkins' evidence
16 in *Misra*, Mr Jenkins gave evidence about a Horizon
17 event, which had occurred at Callendar Square post
18 office in Falkirk in 2005, whereby information recorded
19 on one terminal was not being correctly passed to
20 another within the branch, creating a receipts and
21 payments mismatch. A software fix of the problem was
22 distributed into the system in March 2006 as part of
23 a fairly major functional change and, therefore,
24 post-March 2006, the Falkirk defect was no longer
25 an issue."

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1 So, based on this paragraph, can we take the
 2 following from it: firstly, that an event or issue
 3 called the Falkirk event arose at the Callendar Square
 4 post office in 2005?
 5 **A.** Correct.
 6 **Q.** But we're not sure when in 2005?
 7 **A.** Correct.
 8 **Q.** Was that correct?
 9 **A.** Correct.
 10 **Q.** Thank you. A software fix was distributed in March
 11 2006?
 12 **A.** Correct.
 13 **Q.** So post-March 2006 it was thought that the Falkirk event
 14 couldn't arise. Do you accept there was no indication
 15 as to when the bug that referred to, or the Falkirk
 16 event, when that first arose?
 17 **A.** Correct.
 18 **Q.** So, assuming favourably that it arose in 2005, it was
 19 live between 2005 and March 2006?
 20 **A.** Correct.
 21 **Q.** Why, then, did the review have a start date of 1 January
 22 2010?
 23 **A.** I'm afraid that I don't -- I can't answer that question.
 24 I don't know -- it pre-dates my joining the Post Office.
 25 I don't know why that date of 2010 was chosen, other

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1 **A.** Correct.
 2 **Q.** When you say "internal" --
 3 **A.** Internal.
 4 **Q.** -- who are you referring to?
 5 **A.** Internal, so that would have been Jarnail Singh, as the
 6 criminal lawyer. I would have thought he -- this is
 7 supposition because I wasn't there, obviously, prior to
 8 my joining but, matters such as these, I would fully
 9 have expected him to bring them to my very firm
 10 attention, very clearly, upon joining.
 11 **Q.** Did you talk to Lesley Sewell in the IT Department?
 12 **A.** Not immediately in my first short period, no. I think
 13 I probably met her, by way of introduction, in the first
 14 few weeks but I couldn't say exactly when.
 15 **Q.** Did you discuss with her this Falkirk issue?
 16 **A.** I don't believe I did at the time, no.
 17 **Q.** Why not?
 18 **A.** I believe that during the first few meetings, as with
 19 any entry to any organisation, I would be focused on
 20 understanding what they do, understanding the scope of
 21 the person's capability and what their areas of
 22 responsibility were, what the current live issues were
 23 for her. I have no recollection during that meeting of
 24 this issue being discussed.
 25 **Q.** Do you have any recollection of it being discussed with

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1 than it probably coincided with the introduction of
 2 Horizon Online but, beyond that, I'm afraid wouldn't
 3 know.
 4 **Q.** But, again, this lands on your desk in the first few
 5 days. Did you not think it was incumbent to review it
 6 and consider whether the advice therein was appropriate?
 7 **A.** Yes, I did at the time and I believe I did review this
 8 advice. I also believe that I talked to Cartwright King
 9 and others in the office who were aware of historic
 10 issues to ascertain from them what, if any, further
 11 actions needed to be taken and, I think I said before
 12 the break, in none of those discussions was it raised
 13 that there were currently live issues or issues that
 14 needed to be dealt with. With the benefit of hindsight,
 15 I can see that, now you've pointed out that paragraph,
 16 that that should have been a line of inquiry I could
 17 have gone down but, at the time, in those first few
 18 days, when I had no formal handover from my predecessor
 19 and was relying very heavily, in fact, almost -- well,
 20 very heavily on external advisers and internal members
 21 of staff to tell me what was a current and live issue,
 22 I'm afraid that just wasn't something that was flagged
 23 to me.
 24 **Q.** We've heard about Cartwright King there, the external
 25 advisers?

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1 her in any future meeting?
 2 **A.** I can't think of anything where this issue came up in
 3 a discussion with her.
 4 **Q.** We have here the Falkirk issue, known as the Callendar
 5 Square bug. The Second Sight Interim Report referred to
 6 two bugs in Horizon Online.
 7 **A.** Mm.
 8 **Q.** Did you think that Post Office would have had access to
 9 documents relevant to any of those three bugs?
 10 **A.** Turning my mind to that question now, I don't think
 11 I turned my mind to that question at the time but
 12 I would have assumed that the Second Sight Report was
 13 based on an internal -- an investigation of matters and
 14 that some of those matters were documented, yes. But
 15 I must say I never expressly turned my mind to what
 16 informed Second Sight in their investigations.
 17 **Q.** Do you think it was incumbent on you to turn your mind
 18 to that, as General Counsel with oversight for a review
 19 into past disclosure failings?
 20 **A.** I think in the context in which it was at the time and
 21 then in the way which things were put to me at the time,
 22 which were very much along the lines of, "There have
 23 been issues in the past, they have been dealt with,
 24 there are no further matters that you, as General
 25 Counsel, need to be aware of", I don't believe that

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1 I would have, in those circumstances, turned my mind, or
 2 at least anyone else in my shoes, at that stage, would
 3 have turned their minds to enquire further, having been
 4 given those assurances.

5 **Q.** So is your evidence to the Inquiry that, at the time,
 6 you thought you were satisfied that the only disclosable
 7 documents were the Second Sight Interim Report and the
 8 Helen Rose Report?

9 **A.** And any other matter which was as ascertained as part of
 10 the review work that was being undertaken. So, for
 11 example, Cartwright King were, to the best of my
 12 knowledge, reviewing 300-odd cases, if something came up
 13 as part of that process, for example a matter in one
 14 case that wasn't disclosed in another, I would have
 15 thought that if there was anything in there, that that
 16 would have come up, I would have been informed of that,
 17 yes.

18 **Q.** So that had to be flagged to you by Cartwright King?

19 **A.** Cartwright King. I think, as I said before the break,
 20 my understanding, which is clearly incorrect, my own
 21 understanding at the time I joined, was historic issues
 22 had arisen, Cartwright King had put in place a process
 23 to sift all the cases to ensure appropriate slower was
 24 made, and none of these additional issues were raised to
 25 me by them at the time.

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1 **A.** Sorry, of?

2 **Q.** You were the person with the oversight or accountability
 3 for the teams you referred to: the Security Team and the
 4 Legal Team?

5 **A.** I didn't have oversight. I had reporting line, as
 6 I said, from John Scott in the Security Team. I would
 7 have felt that he should have reported to me, if there
 8 were any issues of this nature. Similarly, Jarnail in
 9 the Legal Team, I felt he should have reported to me if
 10 there were issues of this nature that needed to be
 11 reporting. And, in that sense, I did have oversight,
 12 yes.

13 **Q.** At this time, were you focused on other matters more
 14 within your area of expertise, like Financial Services
 15 rather than this review?

16 **A.** Yes, indeed, I perhaps haven't made it clear but in --
 17 upon joining the Post Office, this was one of a very
 18 large number of matters, pressing matters which needed
 19 to be dealt with and it didn't, therefore, occupy much
 20 of my time for those -- well, it wasn't the main focus
 21 of my activities because there were other pressing
 22 matters to deal with.

23 **Q.** Should it have been the main focus?

24 **A.** It wasn't put to me as such, no, not at the time.

25 **Q.** But in your view, as a legal professional, dealing with

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1 **Q.** Would you accept it is a failing not to have searched
 2 for further documents that may have been relevant to
 3 those bugs, to which Post Office had access?

4 **A.** So I accept there was a duty on the Post Office, as the
 5 prosecutor, to ensure that all relevant material was
 6 disclosed to those that had been convicted. I also
 7 accept that the -- as part of that process, it would
 8 have fallen within, at that stage, the remit of the
 9 Legal Team. It would have fallen in the remit of the
 10 so-called Wednesday morning hub meetings, which were, to
 11 the best of my knowledge, being undertaken at the time,
 12 and it also would have fallen in the remit of those in
 13 the Security Team who had also had knowledge of these
 14 matters.

15 So, to answer your question directly, I believe
 16 there was a shared responsibility to ensure that
 17 historic matters were disclosed. However, I think, as
 18 I've said before, my working assumption on joining the
 19 Post Office was that appropriate processes had been in
 20 place and were now in place to deal with those issues.

21 **Q.** When you say it's a shared responsibility, do you take
 22 a share of that responsibility?

23 **A.** Yes, indeed, I do. Yes, of course.

24 **Q.** Do you accept that you were the person with oversight of
 25 the teams you referred to?

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1 a review of past convictions, do you think it should
 2 have been your main focus?

3 **A.** I believe at the time I gave it the focus which
 4 I thought it needed to do the job properly and, if
 5 I failed in that regard, then, you know, that is
 6 something for which I apologise. But, at the time, in
 7 the circumstances, I believed I was dealing with matters
 8 in an appropriate matter, as informed by the information
 9 that I'd received from those that had more background
 10 and more detail than I did.

11 **Q.** I want to move on. I'm going to go slightly out of
 12 chronological order and look at something called Project
 13 Zebra. This, for background, was in April/May time
 14 2014, so the Mediation Scheme was up and running.
 15 I want to start by looking at some advice from
 16 Linklaters. It's POL00107317, please. This was advice
 17 from Linklaters to Post Office Limited to assist with
 18 legal matters relating to the recoverability or the
 19 ability of subpostmasters to recover in the Mediation
 20 Scheme; is that correct?

21 **A.** Correct.

22 **Q.** Can we turn to page 3, please, paragraph 2.3. At the
 23 end, it says:

24 "We note that there is, so far as we understand it,
 25 no objective report which describes and addresses the

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1 use and reliability of Horizon. We do think that such
2 a report would be helpful, though there is a decision to
3 be made about how broad and/or thorough it needs to be."

4 Effectively, this is the source of the
5 recommendation to get a report, which became known as
6 Project Zebra; is that right?

7 **A.** Correct.

8 **Q.** Could we please turn to page 10, thank you, down to
9 paragraph 5.34. It says:

10 "Even without the baseline report which Second Sight
11 should have produced ..."

12 Just pausing there, Linklaters criticised the
13 reports produced by Second Sight, and that's the context
14 of that comment, isn't it?

15 **A.** Yes.

16 **Q.** It suggested there should have been a baseline report on
17 Horizon. It goes on to say:

18 "... it seems to be accepted generally that there
19 are no systemic weaknesses in the Horizon system. This
20 much has been made plain by ..."

21 Then it lists three matters. The second we see --
22 sorry, the first point we see, it says:

23 "We understand that a Dr Gareth Jenkins of Fujitsu
24 provided expert reports for the Post Office in several
25 criminal cases. These reports dealt with the Horizon

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1 **Q.** Do you think you should have done, to put some context
2 on to the paragraph we just went to?

3 **A.** I'm not sure that I turned my mind to that, at the time.
4 The focus of this report was on other matters.

5 **Q.** The Board subsequently requested or authorised Project
6 Zebra to go ahead and that was with Deloitte.

7 **A.** Mm.

8 **Q.** You were involved, I believe, in putting together the
9 retainer for Deloitte; is that correct?

10 **A.** Correct, yes, at the Board's instructions and in
11 accordance with the brief that they had set, yes.

12 **Q.** Could we please go to POL00108395, and can we go to
13 page 2, please. Further down the page, please. It's
14 an email from Rodric Williams to Gareth James at
15 Deloitte. I should say, sorry, you are in copy.

16 **A.** Mm-hm.

17 **Q.** It says:

18 "Gareth,

19 "As discussed earlier today ..."

20 Were you involved in that conversation between --

21 **A.** I may or may not have been. I'm afraid have no
22 recollection of that conversation. If it says I --

23 **Q.** It goes on to say:

24 "In order to respond to these allegations (which
25 have been, and will in all likelihood continue to be,

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1 system. He gave oral evidence in only one case (that of
2 Seema Misra). That case resulted in a conviction. In
3 all other cases the fact that he was not required to
4 give oral evidence strongly suggests to us that there
5 was no substantive challenge to his evidence."

6 Do you think, if someone was reading that paragraph,
7 they would take less reassurance from it if they were
8 aware of the matters raised in the Simon Clarke Advice
9 of 15 July 2013?

10 **A.** Yes, indeed.

11 **Q.** That document can come down for the moment. Thank you.

12 The advice as was subsequently presented to the
13 board, wasn't it?

14 **A.** The --

15 **Q.** I'm so sorry, that was an imprecise question.

16 **A.** Yes.

17 **Q.** The Linklaters advice --

18 **A.** Yes, it was indeed, yes.

19 **Q.** -- and you presented it?

20 **A.** Yes, with Christa Band, who I think attended from
21 Linklaters.

22 **Q.** When you presented it to the Board, did you say that "We
23 have legal advice from Mr Simon Clarke that alleges that
24 Mr Gareth Jenkins breached his duty as an expert"?

25 **A.** I don't believe I did, no.

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1 advanced in the courts), the Post Office wants to
2 demonstrate that the Horizon system is robust, fit for
3 purpose and/or operates within an appropriate control
4 framework."

5 Is it fair to say that doesn't read as if
6 Mr Williams is requesting an independent investigation
7 into the integrity of Horizon but more a document to
8 respond to allegations about the Horizon IT System and
9 demonstrate that it is robust?

10 **A.** I can't speak for what was going through Mr Williams'
11 mind at the time but I would say it was -- it would be
12 standard -- and I should also say that, at the time and
13 now, in fact, this doesn't strike me as an unreasonable
14 way to preface a short email to set out the proposition
15 that is to be tested.

16 **Q.** Well, let's look at the terms of engagement, please.
17 It's POL00108462. Thank you. This is dated 9 April, so
18 a few days after that email. Presumably there'd been
19 some discussions or correspondence between Deloitte and
20 Post Office regarding the retainer and this was what was
21 settled on following those discussions.

22 **A.** Mm-hm.

23 **Q.** Was that yes?

24 **A.** Yes, sorry, yes.

25 **Q.** If we could go down, please, it says under "Scope and

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1 objectives":
 2 "You want to demonstrate that the Horizon HNG-X
 3 system robust and operates with integrity, within
 4 an appropriate control framework."
 5 It goes on in the next paragraph to define "Part 1
 6 work", saying:
 7 "[Deloitte] is to provide, based upon information
 8 made available to us by You, an independently produced
 9 summary of the assurance and other work undertaken, over
 10 your current day Horizon HNG-X system, for presentation
 11 to and discussion with the [Post Office Limited] Board
 12 ..."
 13 Go to page 3, there's a bit more substance put on
 14 that. You see at the bottom -- I'm so sorry, page 2.,
 15 further down, please. Thank you. It says, "Services":
 16 "Part 1 of our Services will provide the following
 17 ..."
 18 Then at page 3, at the top, it says:
 19 "Review, understand and consolidate the
 20 corresponding investigations, assurance activities and
 21 remediation actions which You or third parties have
 22 undertaken (see Appendix 1 for the 'Sources of
 23 Information' ..."
 24 It goes on to state the focus of the areas.
 25 So this was looking at assurance work that had
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1 test or verify the information given to us in the course
 2 of the Services."
 3 It goes on to say:
 4 "... we will not perform or re-perform any assurance
 5 work that has tested and concluded on the design,
 6 implementation and operational effectiveness of any
 7 internal controls over the Horizon processing
 8 environment."
 9 Then if we could go to page 7, "Assumptions". If
 10 you could go further down the page, please, about midway
 11 there:
 12 "Unless otherwise instructed, the Deloitte staff
 13 will have no direct contact with any third parties other
 14 than the named Fujitsu contacts that You provide to us."
 15 The next but one on:
 16 "Deloitte will not verify or test any information
 17 provided directly by You, or indirectly by third parties
 18 via You."
 19 So it's a paper-based assurance review, yes?
 20 **A.** I believe the expression that was used at the time was
 21 a desktop based assurance review --
 22 **Q.** Desktop.
 23 **A.** -- which I had understood to be, from my IT colleagues,
 24 to be standard practice for this type of assurance
 25 activity.
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1 already been done; is that right?
 2 **A.** Correct, yes.
 3 **Q.** It wasn't carrying out independent assurance work in
 4 itself? It wasn't a new --
 5 **A.** As I understand the Part 1 work, it was a review of the
 6 assurance activities that had historically been
 7 undertaken in respect to the Horizon Online system.
 8 **Q.** At that point, Post Office Limited wasn't aware of any
 9 assurance -- so, sorry.
 10 At that point, had you yourself been briefed on what
 11 assurance work was already available to Post Office
 12 Limited?
 13 **A.** I wouldn't have thought I was briefed on any detail as
 14 to the assurance work that had previously been
 15 undertaken.
 16 **Q.** If you could go down, please, on page 3, I want to look
 17 at some of the assumptions and limitations. It says:
 18 "You do not require Deloitte to comment on or test
 19 the quality of the assurance work performed, nor opine
 20 on its adequacy, sufficiency or conclusions, or the
 21 integrity of the Horizon HNG-X processing environment
 22 (nor the Legacy Horizon system)."
 23 Turn to page 4, please. It says:
 24 "You agree that other than as set out in the
 25 Services section above, we will not audit or otherwise
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1 **Q.** It's not testing the adequacy of the assurance work
 2 already taken out --
 3 **A.** No, it appears, from this description, to be looking at
 4 the universe of assurance activities that were
 5 undertaken and providing a desktop commentary as to
 6 whether those activities were -- that universe was
 7 complete.
 8 **Q.** Deloitte would speak to people at Fujitsu and Post
 9 Office but accept what they're saying without
 10 challenging the accuracy of it?
 11 **A.** I believe that's the nature of the desktop activity,
 12 yes.
 13 **Q.** If we could go to page 1, please, to the bottom, please.
 14 With the Part 1 work, you see the penultimate paragraph
 15 refers to the Part 2 work. It says:
 16 "We understand that the input provided by Deloitte
 17 will inform Your decisions relating to potential areas
 18 of additional work that You may choose to commission to
 19 respond better to the Allegations, and that we may be
 20 involved in the delivery of such additional work ('Part
 21 2 work') under either a Change order or separate
 22 Engagement."
 23 So is it envisaged that, once Post Office had
 24 reviewed the Part 1 work, it may commission something
 25 beyond a desktop review, which Deloitte may carry out,
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1 and that was Part 2 work?

2 **A.** I believe that's the case. In practice, it didn't quite
3 work out like that, from memory.

4 **Q.** In your witness statement -- and we can bring this up,
5 please, page 114, paragraph 214 -- you referred here to
6 the Linklaters Project Zebra work. You say in the
7 middle:

8 "... in broad terms it was directed at trying to
9 establish whether or not Horizon was designed and
10 functioning as intended."

11 Is it fair to say that the Part 1 work wouldn't be
12 able to establish whether it was functioning as
13 intended?

14 **A.** I believe that's correct. Part 1 work -- and, again,
15 I would have to defer to those with greater IT expertise
16 than I have -- was designed to look at the assurance
17 activities that were undertaken in respect of Horizon,
18 with a view to informing further work. I also believe
19 that was in pursuance to the sort of Board direction
20 given at a Board meeting earlier that year.

21 **Q.** Please could we look at POL00006565. These are minutes
22 of a meeting of the Project Sparrow subcommittee on
23 9 April 2014, so the same day, I think, as the
24 engagement terms were signed -- sorry not signed, sent,
25 I should say, the same day they were sent.

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1 The words here, I think, would have been
2 a combination of inputs from various people, including
3 very much Lesley Sewell in her capacity as CIO.

4 **Q.** Why would the Part 1 work be sufficient assurance to
5 assure Post Office that Horizon was fit for purpose?

6 **A.** Sorry, I didn't get that.

7 **Q.** Sorry, if the Part 1 work had come out as Post Office
8 hoped it would do, positively, why would that desktop
9 review in itself be sufficient to assure Post Office
10 that Horizon was fit for purpose?

11 **A.** In the event, I think, that the Part 1 work was
12 subsequently superseded or augmented by a further piece
13 of work, which arose out of that Part 1 work. My
14 understanding is that Part 1 was a scoping exercise, in
15 part, as well as an assurance-gathering exercise --
16 assurance information-gathering exercise.

17 It was as part of the information-gathering exercise
18 that informed what I believe was a subsequent piece of
19 work, asked of Deloitte that was more specific, and
20 focused on the questions that the Board felt it needed
21 to answer.

22 **Q.** Well, we'll come to that shortly but, as I understand it
23 in April, Part 2 was never enacted; is that right?

24 **A.** I believe so, yes, that's correct.

25 **Q.** It says here at (d):

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1 Could we look, please, at page 4, and to the bottom
2 you see there's an update on Horizon Online HNG-X
3 Horizon assurance work. At (c), it says:

4 "Although no system could be absolutely
5 'bulletproof', no issues had yet been identified through
6 the cases being investigated or any other route that has
7 called into question the integrity of Horizon. Nor have
8 any widespread systemic faults been identified since
9 Horizon Online was implemented. These two points, along
10 with the Part 1 work ..."

11 Presumably referring to the Deloitte Part 1 work;
12 yes?

13 **A.** Yes, correct.

14 **Q.** "... (depending on the results) should be sufficient to
15 assure Post Office that Horizon is fit for purpose."
16 Who is saying this, at the meeting, can you
17 remember?

18 **A.** My recollection is that the work was commissioned by me
19 in order to ensure legal professional privilege attached
20 to the work product. The content and structure of the
21 work would have been very much informed by the IT Team,
22 the CIO, I imagine that's Lesley Sewell. I can't recall
23 the extent to which the Finance function was involved in
24 this. After all, Horizon is an online accounting
25 system, essentially.

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1 "Part 2 not an essential piece of work at this stage
2 ..."

3 **A.** I believe that's correct, yes.

4 **Q.** So why -- again I asked when you said earlier Part 1
5 wouldn't be able to assist with whether Horizon was
6 functioning properly -- why was it considered that it
7 was only Part 1 work that was essential at this time?

8 **A.** I'm afraid I don't know why that conclusion was drawn.
9 I can't recall why that conclusion was drawn.

10 **Q.** Did you not have any doubts yourself?

11 **A.** As to the --

12 **Q.** As to whether Part 1 would be enough?

13 **A.** My recollection is that the Part 1 work was -- raised
14 some further questions and that they were addressed in
15 a subsequent piece of work but the Part 1 work in itself
16 only gave the Board comfort as regards existing
17 assurance activities that had been undertaken but no
18 more than that.

19 **Q.** So you can't assist further with why it was saying
20 Part 2 work wasn't essential --

21 **A.** No, I'm afraid it's outside my sphere of expertise.

22 **Q.** I want to come back to something you said earlier about
23 this work in your instruction. You referred to it being
24 you instructing Deloitte to maintain legal professional
25 privilege.

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1 A. Mm.
 2 Q. Why was that seen to be an important matter?
 3 A. I believe at that time, possibly we're talking April
 4 2014, that, by that time, the JFSA had made it clear, or
 5 at least made it clear to Second Sight, who, in turn,
 6 had made it clear to us, that litigation was likely as
 7 a consequence of the Mediation Scheme, and that
 8 information was being gathered as part of that scheme
 9 for the purposes of pursuing litigation against the Post
 10 Office.
 11 And I think it was in that context that a decision
 12 was made to try to preserve legal professional privilege
 13 where appropriate. And it was, I think, on advice --
 14 I'm not sure if it was advice from Linklaters or advice
 15 from Bond Dickinson -- that this was commissioned by me
 16 as General Counsel for that purpose: to ensure that
 17 there was legal professional privilege.
 18 Q. Two points arising from that. The first is assuming --
 19 in hypothetical, at that point, when Deloitte had been
 20 instructed by you to maintain professional privilege --
 21 if the report had come back very negatively and it was
 22 adverse to Post Office, can we infer that the intention
 23 was to rely on legal professional privilege to try to
 24 stop that being disclosed outside of the Post Office?
 25 A. I don't know if we can infer that at all. It would
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1 A. I would have thought so. I would have thought so. But,
 2 again, I have no specific recollection of where the
 3 advice came from.
 4 Q. Please could we look at POL00021524. It's a meeting of
 5 the Post Office Board. If we can go down to the
 6 attendance list, please. We see that you are in
 7 attendance for items 14/48-49, and 14/55. Could we turn
 8 to page 6, please.
 9 So 14/55, we see that you're introduced there with
 10 Gareth James, who was a partner at Deloitte responsible
 11 for the work, who refers to a draft report, which we
 12 don't need to go to at this stage. I want to look at
 13 the minutes at (d) and (e), please. It says:
 14 "Gareth James reported that all the work to date
 15 showed that the system had strong areas of control and
 16 that its testing and implementation were in line with
 17 the best practice. Work was still needed to ensure the
 18 controls and access at the Finance Service Centre."
 19 Do you know what that refers to, the Finance Service
 20 Centre?
 21 A. I believe that was part of the accounting function.
 22 Q. The next paragraph:
 23 "Chris Aujard explained that several of the
 24 subpostmasters who were challenging Horizon had made
 25 allegations about 'phantom' transactions which were
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1 depend entirely on the outcome. My view would be
 2 that -- or my recollection of the Post Office at the
 3 time is as follows: if it was of a matter that pertained
 4 solely to civil litigation, then consideration would
 5 have to be given as to how that would be dealt with.
 6 Clearly, there were mediation cases going on at that
 7 point. My -- and this is conjecture -- my view would
 8 be, therefore, it would be disclosed as part of those
 9 mediation cases.
 10 If it pertained to matters which had a criminal
 11 disclosure component to them, it would be disclosed
 12 under the normal rules relating to disclosure of
 13 material relating to past criminal convictions. But I'm
 14 afraid they're both conjecture because it's
 15 hypothesising as to what may have happened in a certain
 16 circumstance.
 17 Q. So why was privilege being maintained then?
 18 A. I think out of an abundance of caution.
 19 Q. Caution for what?
 20 A. Caution to ensure that, if the report arose in such
 21 a manner as to -- that where privilege could be
 22 asserted, that opportunity wasn't foregone.
 23 Q. You said it was obtained on advice. Just so I can be
 24 clear, that advice, either from Linklaters or from
 25 Womble Bond Dickinson, is that your recollection?
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1 non-traceable. Assurance from Deloitte about the
 2 integrity of the system records logs would be very
 3 valuable."
 4 "Phantom transactions" is used in numerous ways.
 5 Can you explain how you were using the term "phantom
 6 transactions" here?
 7 A. I don't believe I have any real recollection of what was
 8 meant by "phantom transactions" in this context, other
 9 than the description which was given, which was
 10 non-traceable transactions that subpostmasters were
 11 concerned or were appearing in their accounts.
 12 Q. So would this include the allegation that a third party,
 13 such as Fujitsu could add, edit or delete transactions
 14 in branch accounts; what we can now call remote access?
 15 A. Yes, yes, I would say that was ...
 16 Q. So remote access at this point is firmly on the Board's
 17 mind and on your mind, it seems?
 18 A. Yes, I'd say that's true.
 19 Q. Can we look please at POL00006566, please. It's
 20 a meeting on 30 April of the Project Sparrow
 21 subcommittee of the Board. You're there being present.
 22 Can we turn to page 2, please. At (b) it says:
 23 "Chris Aujard reported on a conversation he had had
 24 with Gareth James, Deloitte Partner, after Board meeting
 25 in which he explained the visibility of 'transaction'
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1 corrections' ..."

2 So that's after the meeting, the minutes of which
3 we've just been to, correct?

4 **A.** Correct.

5 **Q.** So you had this conversation with him:

6 "Chris Aujard further explained that Gareth Jones
7 [should be James] thought the fact that [transaction
8 corrections] were visible would enable his assurance
9 work to be completed more quickly. Chris Aujard was
10 asked to liaise with Deloitte to ascertain what level of
11 assurance could be achieved in 1, 2 or 3 weeks and at
12 what cost."

13 So, again, you'd had a discussion with Gareth James
14 after the meeting and you were reporting on it to this
15 meeting. Why was remote access and issues such as
16 transaction corrections at the front of your mind at
17 this time?

18 **A.** I would imagine but only a -- it's conjecture -- that,
19 following the Board meeting, there was a discussion
20 regarding the so-called phantom transactions --
21 discussion or email exchange, I don't know which -- and
22 that the -- as part of that discussion -- and somewhere
23 in here it references the fact that those transactions
24 were visible -- Gareth James gave assurance that it
25 could be reviewed and a view formed on it relatively

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1 Do you have any recollection of this issue now?

2 **A.** I have some recollection of this issue but not
3 a detailed recollection of the issue.

4 **Q.** Can you remember why Rodric Williams was raising this as
5 a particular point of concern at this time?

6 **A.** So the timing of this is 20 May, prior to the receipt of
7 the Deloitte --

8 **Q.** The 72-page report, yes?

9 **A.** Yes, so I imagine this is being sent in order to
10 understand and inform the detail of that report but
11 that's a slightly reconstructed memory, I'm afraid.

12 **Q.** So these are matters that are going through -- or you
13 think reconstructed -- going through your mind and
14 Rodric Williams' mind, which you want to be -- more
15 information on now and, presumably, these are matters
16 that you would then look out for in the future report?

17 **A.** Yes, indeed, yes.

18 **Q.** Could we turn to page 2, please, and go down. You've
19 seen this email, I don't need to take you to all of it.
20 It's a description of what the issue was. In the middle
21 it says:

22 "There remains a small risk (that can only really be
23 discounted by detailed testing) that someone with the
24 requisite access rights to the 'digital keys' used in
25 the sealing process and admin access on the Audit Store

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1 quickly.

2 **Q.** But you're aware that transaction corrections are
3 a particular type of insertion into branch accounts
4 which a subpostmaster would have seen. Were you aware
5 of that at the time, presumably?

6 **A.** I believe the expression transaction corrections covers
7 a multitude of different transactions being entered into
8 the subpostmaster's system. I don't know whether this
9 refers solely to transaction corrections that were
10 "phantom" corrections or other transaction corrections,
11 which I believe are entirely visible and are seen by the
12 subpostmaster.

13 **Q.** I'm not going to cover that point now because we'll come
14 to some documents that I think shed some light on it
15 shortly but, before we get to that one, can I go to
16 POL00029728, please. If we could go to page 3, please.
17 It's an email from Rodric Williams on 20 May 2014 to
18 Gareth James and Mark Westbrook, both of Deloitte,
19 copied to you, and he asks for an update on something
20 that Mr James had identified, saying:

21 "... you identified an example where 'a [Horizon]
22 control was not implemented as understood', namely that
23 the audit store Centera pox is configured only to
24 'Basic' settings, not the more secure 'CE+' setting as
25 we seemingly understood."

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1 could theoretically:

2 "Delete an audit store record ...

3 "Recreate the transactional data that was originally
4 within that Audit Store file to suit whatever purpose
5 they might have ...

6 "Seal it using the correct key to generate a valid
7 seal value.

8 "Reinsert it into the database ..."

9 What were your views on that when you saw this? Can
10 you recall?

11 **A.** I think my view was informed by the last or penultimate
12 paragraph, which raises a question about who has the
13 requisite access rights and is key management able to
14 exploit this, which to my mind was an issue which
15 needed, therefore, to be investigated further by
16 Deloitte before they could opine on it.

17 **Q.** So, as a principle, is it fair to say it's a worrying
18 proposition that this type of access and edit rights is
19 possible but you thought there was a sort of in practice
20 thing to investigate of whether or not it could actually
21 be used in practice?

22 **A.** I think that's probably a fairer summary of my state of
23 mind at the time.

24 **Q.** You referred to a 72-page report. I want to turn to
25 that now. It's POL00028062. So this is the draft dated

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1 23 May 2014. A report of some significance, would you
2 agree?

3 **A.** Yes, indeed.

4 **Q.** So presumably you read it carefully?

5 **A.** On this report, in particular, I think that the concern
6 I had at the time was to answer the Board's request for
7 a readily digestible, simple report that they could
8 read. I think that when this was received, it was
9 a very apparent from its size that it wasn't such
10 a report. It was detailed and technical. My
11 recollection is that Rod reviewed that report,
12 I discussed it with Linklaters, and that we agreed that
13 this was not the type of report that could go to the
14 Board and, as a consequence of that, we asked Deloitte
15 to do a further Board briefing summary.

16 In light of that activity, I'm not sure that I could
17 say now that I read the report in its entirety. I think
18 what I could say is I reviewed the report, certainly the
19 front end of the report to see whether a Board would
20 find that acceptable.

21 **Q.** Two separate things there, really, aren't there: one is
22 this is a detailed report, and it may contain
23 information that's very important to the business on
24 a technical level?

25 **A.** Correct.

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1 it, would have picked up on items 1, 6 and 7, to delve
2 further into whether or not they related to matters that
3 concerned disclosure in relation to past convictions.

4 So the answer is I just don't know but I don't
5 believe so.

6 **Q.** Should someone have reviewed these documents to
7 determine whether they should have been disclosed?

8 **A.** So, at the time that the report was properly considered,
9 which I believe was a number of days or weeks later,
10 yes. I agree that someone should have looked through
11 this report and asked the question: is there -- does
12 this trigger any duties of disclosure? I can't, at the
13 moment, for sure say that that happened. I think I say
14 in my witness statement that I did -- I'm not sure
15 whether I took steps to disclose this report to
16 Cartwright King, which would have obviously been the
17 most appropriate next step in these circumstances.

18 If I haven't done, that's a matter of absolute deep
19 regret because it's something that, had I known what
20 I now know about the system and had I the technical
21 expertise to understand these points, I believe that
22 that is something that should have happened.

23 **Q.** So your evidence is you can't remember if it was given
24 to Cartwright King but that's how, in terms of how the
25 review worked, how you would have gone about the

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1 **Q.** On a separate point, there's an issue of presentation,
2 as to whether that's in --

3 **A.** Correct.

4 **Q.** -- a form to be presented to the board?

5 **A.** Correct.

6 **Q.** The fact this is very technical and detailed shouldn't
7 stop the someone in the business from reviewing it in
8 detail?

9 **A.** Indeed, and I believe that, with this report in
10 particular, it was reviewed by numerous people in the
11 business, a short time after it was received, though
12 I couldn't say exactly when.

13 **Q.** Can we look at page 56, please. This is "Appendix 3:
14 Inventory of Documentation Reviewed", and we see we have
15 a "Horizon Core Audit PowerPoint"; further down, 6 and
16 7, "Report on Local Suspense (14 Branch) Issue", "Report
17 on Receipts Payments (62 Branch) issue".

18 Did anyone in the Legal Department go through this
19 list to determine whether these are documents that
20 should be disclosed pursuant to the Post Office's
21 post-conviction duty of disclosure.

22 **A.** I'm not sure that they did. As I said, I believe Rod
23 Williams, who had carriage of sort of the detail of this
24 report, did review this report. I'm not sure that, as
25 a consequence of that, he or anybody, indeed, reviewing

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1 disclosure review: by providing the report to Cartwright
2 King for them to then provide advice to --

3 **A.** Yes, indeed, yeah, or at least to give -- if they didn't
4 provide advice, at least to give guidance as to what the
5 next steps should be.

6 **Q.** Could we turn, please, to page 60. It says here:

7 "With the prior permission of [Post Office Limited],
8 the following individuals were interviewed or consulted
9 during the course of our review ..."

10 We see towards two-thirds of the way down Gareth
11 Jenkins is there. Are you aware if Deloitte had been
12 informed of the contents of Simon Clarke's Advice of
13 15 July 2013?

14 **A.** No, I'm not aware of whether they had or they hadn't but
15 I believe that they would have been well aware of the
16 fact that he was tainted as a witness for the advice
17 he'd given or evidence he'd given in a number of cases.

18 **Q.** Why did you have that belief?

19 **A.** Because, at the time within the Post Office, that was
20 very much common knowledge. They had been briefed by
21 Rod as part of their onboarding process and I would have
22 been very surprised if, you know, a salient fact like
23 that hadn't been disclosed to them. But I had no
24 independent -- sorry, I should make it clear, I have no
25 independent recollection or evidence that that happened.

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1 Q. Thank you. Could we look, please, at page 30. If we
2 could go to the bottom of that page, please, these are
3 findings. You see "(4) System Usage" and "Partial
4 Documentation" on the right. Under "Audit Store", it
5 says:

6 "We observed the following:

7 "It is not clear from the documentation we have been
8 provided whether [Post Office Limited] has agreed that
9 the current capturing of certain key system events is
10 complete and appropriate for potential governance and
11 investigation needs."

12 Would you have read this part of the report at the
13 time?

14 A. I'm not sure would have read this report at that time,
15 I think it's highly likely that I read the report at
16 a later date in full when it was considered by a wider
17 audience internally.

18 Q. When do you think that would have been?

19 A. I believe there were some meetings held at the beginning
20 of June, but I'm afraid I can't give the exact dates, to
21 consider this. Certainly, it's referred to --

22 Q. Risk and Compliance Committee meeting?

23 A. Risk and Compliance.

24 Q. We'll come to that in due course. Do you think that
25 might have been later on?

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1 Office Limited, isn't it?

2 A. Correct.

3 Q. So not being able to identify controls that review,
4 report and consider the impact of exceptions identified
5 during extraction of that data is quite significant,
6 isn't it?

7 A. Yes, significant, however, this is on page 30 of a very
8 long report and I believe it talks to a headline comment
9 in the summary section, which indicates that things are
10 working as they should. So, to my mind, having re-read
11 this report recently, this seems to be identified as
12 a relatively low level issue that departs from a high
13 level -- as an exception to a high level assurance that
14 they've given. Having said that, that doesn't in any
15 way detract from the importance of it. It's just
16 somewhat surprising that it appears on page 30 of
17 a document where it clearly it is of some significance.

18 Q. Yes, reading that, do you accept that once you read
19 that --

20 A. Once --

21 Q. -- the significance is clear?

22 A. Once that is read, it would put -- and I think it did
23 put people on inquiry as to what further steps or
24 actions need to be taken.

25 Q. Did you just say "further steps need to be taken"?

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1 A. I think that was later on, yeah.

2 Q. So we don't have to come up back to it. What was your
3 understanding here of potential governance and
4 investigation needs? What investigation needs were
5 being referred to?

6 A. I'm not sure, I'm afraid, investigation needs. It could
7 refer to a number of matters. It could refer to the
8 criminal investigations or it could refer to
9 investigations necessary to satisfy the Finance function
10 that certain things were operating in the right way.
11 I'm afraid I don't know.

12 Q. So:

13 "We have not identified controls which formally
14 report, review and consider the impact and resolution of
15 any exceptions identified during the Audit Store
16 extraction process, nor reconcile the data from other
17 reporting systems in the business to those datasets
18 contained within the Audit Store."

19 What did that mean to you?

20 A. I believe, as in the nature of these reports, what it
21 meant was exactly the words used: that they have not
22 identified controls, they're not saying there are no
23 controls and nor do I read that to say that there are --
24 sorry. I'd finished, yes.

25 Q. Data in the audit store is quite important for Post

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1 A. Yes, indeed, yes. What other steps people -- I read
2 that to say what -- this implies that further actions of
3 some sort need to be taken, either to receive comfort
4 that there are such controls or to satisfy themselves --
5 or to undertaken a further report of some such thing.

6 Q. Over the page, please, (f), I don't need to cover it
7 again but it's, effectively, the Centera EMC point,
8 which we referred to in the email before. So this is
9 something you were presumably looking out for, given
10 you'd had an email on it?

11 A. At a subsequent time. As I said, I don't believe, when
12 this report was received on 23/24, whenever it was, May,
13 that I would have gone into that level of detail at that
14 stage. It would be also something that I would have
15 relied very heavily upon my IT colleagues to tell me
16 what the significance of this is, as it appears to be
17 drafted in such a way to say, if A and B then C, and I'm
18 not sure what the references are in there to the various
19 technical boxes, et cetera, so --

20 Q. Do you think, as a non-technical person, you can read
21 from this that what they're saying is that it's possible
22 for someone to change the data in the audit store?

23 A. Actually, if you give me a moment, I'll read it now, if
24 that's okay.

25 Q. Please do.

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1 A. What I read that to say is, if there are no alternative
 2 controls and if management are not -- is not adequately
 3 segregated, then -- and I'm not sure of the technical
 4 description of these solutions -- the seals would
 5 potentially allow privileged users like Fujitsu to
 6 delete sealed files. So I read that to say, if two
 7 things occur, then sealed files can be deleted. Sorry,
 8 that's my reading of it now, rather than --
 9 Q. And replaced with fake file in an undetectable manner?
 10 A. Correct. Correct, correct.
 11 Q. So, again, is this something being raised as
 12 a possibility, further work needs to be done to see if
 13 it does occur in practice?
 14 A. Yes, indeed, yeah.
 15 Q. If we can look at branch database at (g), please. We
 16 see:
 17 "A method for posting 'Balancing Transactions' was
 18 observed from technical documentation which allows for
 19 posting of additional transactions centrally without the
 20 requirement for these transactions to be accepted by
 21 subpostmasters, (as 'Transaction Acknowledgements' and
 22 'Transaction corrections' require)."
 23 So we earlier talked about transaction corrections,
 24 this now talking about balancing transactions:
 25 "Whilst an audit trail is asserted to be in place
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1 covered by Part 2, wasn't it?
 2 A. Yes. Yes, indeed, yeah.
 3 Q. Now, there's a lot of correspondence between this report
 4 and the June board update. Let's go just to the update.
 5 It's POL00028069. So this is a shorter document, 4 June
 6 2014, which was prepared for the Board.
 7 A. Mm-hm.
 8 Q. My understanding of your evidence is this was sent by
 9 email to the Board?
 10 A. Yes, that's what the documents show.
 11 Q. It's a much shorter document. If we could please turn
 12 to page 7. I should have asked -- we're here now, but
 13 would you have read this in detail before sending it on
 14 to the Board?
 15 A. Yes, yes, I would have done, yes.
 16 Q. So page 7, "Matter 3":
 17 "Baskets of transactions recorded to the Audit Store
 18 are complete and 'digitally sealed', to protect their
 19 integrity and make it evident if they have been tampered
 20 with."
 21 The third bullet point, towards the end, says:
 22 "The configuration of the physical hardware does
 23 however permit administrators to delete data from the
 24 Audit Store during the seven year period, which was
 25 a matter found to be possible and contrary to [Post
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1 over these functions, evidence of these features is not
 2 available."
 3 Presumably that was of some significance -- you
 4 would have seen that to be of some significance?
 5 A. I would have thought so, yes.
 6 Q. Third bullet point:
 7 "For 'Balancing Transactions', 'Transaction
 8 Acknowledgements' and 'Transaction Corrections' we did
 9 not identify controls to routinely monitor all centrally
 10 initiated transactions to verify that they are all
 11 initiated and actioned through known and governed
 12 processes, or controls to reconcile and check data
 13 sources which underpin current period transactional
 14 reporting for Subpostmasters to the Audit Store record
 15 of such activity."
 16 So again, with balancing transactions, is this
 17 another area of work highlighted which requires further
 18 investigation?
 19 A. Indeed.
 20 Q. The point you entered the contract, that was what was
 21 envisaged to be the Part 2 work, potentially, if Post
 22 Office chose to do that work?
 23 A. Potentially. I'm not entirely sure what would have been
 24 covered by the Part 2 work but, potentially, yes.
 25 Q. Well, it was up to Post Office to determine what was
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1 Office Limited's] understanding of this physical
 2 protection feature. This could allow suitably
 3 authorised privileged staff in Fujitsu to delete
 4 a sealed set of baskets and replace them with properly
 5 sealed baskets, although they would have to fake the
 6 digital signatures."
 7 It goes on to say:
 8 "We have not identified any documented controls
 9 designed to:
 10 "Prevent a person with authorised privileged access
 11 from deleting a digitally sealed group of data and
 12 replacing it with a 'fake' group within the Audit
 13 Store."
 14 It goes on. That's the Centera EMC issue, is it?
 15 A. Yes, indeed, yes.
 16 Q. Is it fair to say that you described the last report as
 17 technical. This was put in terms that were -- it was
 18 capable and clear for you and the Board to understand?
 19 A. Yes, that's correct.
 20 Q. Please could we turn to page 8, down to "Balancing
 21 Transaction", please. It says:
 22 "... this is an emergency process, accessible only
 23 to restricted individuals in Fujitsu, which can create
 24 transactions directly in Branch ledgers. This process
 25 creates an identifiable transaction in the ledger,
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1 verbally asserted by [Post Office Limited] staff to be
 2 visible to subpostmasters in their branch reporting
 3 tool, but does not require positive acceptance or
 4 approval by the subpostmaster. The use of the process
 5 has a full audit trail, monitored by Fujitsu. It is
 6 asserted by them that the process has only been used
 7 once (in 2010) between 2008 and the time of their
 8 assertion in this area ... As our work did not involve
 9 testing, we cannot comment on the circumstances [of]
 10 this event."

11 Then over the page, please.

12 "All processes, with the exception of Balancing
 13 Transactions, operate on the principle of full
 14 subpostmaster disclosure and acceptance."

15 At the bottom:

16 "Subpostmasters have access to view all
 17 transactional records underpinning their current
 18 accounting period's ledgers. This information is used
 19 to support their daily branch cash declarations and
 20 reconciliation, their weekly balance of cash and stock
 21 and reconciliation and their monthly trading period
 22 rollover activities."

23 Again, this is written in clear language as to what
 24 balancing transactions are, yes?

25 A. Correct.

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1 afternoon break.

2 **SIR WYN WILLIAMS:** Yes, that's fine. How are we doing,
 3 generally, Mr Stevens?

4 **MR STEVENS:** We'll be okay, I'll say, sir.

5 **SIR WYN WILLIAMS:** That's -- yes, I won't make a comment.

6 **MR STEVENS:** There are questions from Core Participants and
 7 I'll build in time for them. I've got a bit to finish
 8 on this topic and another one but we should be finishing
 9 today, sir.

10 **SIR WYN WILLIAMS:** Good.

11 **MR STEVENS:** I think the transcriber has said one 15-minute
 12 works for her, rather than two 10-minute breaks, given
 13 we're having a longer afternoon.

14 **SIR WYN WILLIAMS:** All right, then, let's do that. So we're
 15 going to resume at 3.10.

16 **MR STEVENS:** Yes, sir, thank you.

17 **SIR WYN WILLIAMS:** Then we'll proceed accordingly. Thanks.

18 **MR STEVENS:** Thank you, sir.

19 (2.54 pm)

(A short break)

21 (3.10 pm)

22 **MR STEVENS:** Sir, can you see and hear us?

23 **SIR WYN WILLIAMS:** Yes, thank you, yes.

24 **MR STEVENS:** Thank you. I can carry on.

25 Please can we go to POL00029733. Actually, we

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1 **Q.** From this, could you have any assurance that
 2 a subpostmaster would be able to identify when
 3 a balancing transaction had been performed by Fujitsu,
 4 namely that it was visible to the subpostmaster that --
 5 well, the transaction was visible, and that it was
 6 visible that it was performed by Fujitsu?

7 **A.** My recollection, but I'm not sure that it's in these
 8 words, is that the subpostmasters can view all
 9 transactions entered, whether created or accepted by
 10 them or not.

11 So, on the first part of your point, which is to do
 12 with visibility, my understanding is that it would be
 13 visible; on the second part, to do with the acceptance,
 14 I believe that that makes it clear that a transaction
 15 such as this, this exceptional transaction, would not
 16 need to be accepted by the subpostmaster.

17 **Q.** I asked a slightly different question. The transaction
 18 may be visible to the subpostmaster. My question is:
 19 could you get assurance that the subpostmaster could
 20 tell that the transaction had been inserted by Fujitsu,
 21 rather than in branch?

22 **A.** Did I get assurance that could be inserted by Fujitsu?
 23 No. No, this doesn't make it clearer one way or the
 24 other.

25 **MR STEVENS:** Sir, that might be a good time to have the

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1 should say, for context, the top email is a forwarding
 2 email from Alwen Lyons to Rodric Williams saying:

3 "Sorry should have cc'd you in as you did all the
 4 work!"

5 If we can carry on down to the body of the email,
 6 please -- thank you -- it's from Alwen Lyons to --
 7 sorry, if we could just look at the distribution list,
 8 thank you. Those are members of the Board of Post
 9 Office Limited at the time; is that right?

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

11 **Q.** It says:

12 "Please find below a message from Chris Aujard and
 13 Lesley Sewell, and attached the Deloitte's Briefing."

14 Would that have been the Board briefing, which we've
 15 just referred to?

16 **A.** I would have thought so, given the date.

17 **Q.** If we look further down, please. It says that the Board
 18 briefing is attached. Then, over the page, it says:

19 "In the briefing, Deloitte expressly identify
 20 a number of limitations and assumptions which underpin
 21 their findings ... The briefing must be read in this
 22 context. That said, its key findings are ..."

23 Then if we could just show the key findings on the
 24 screen, if you could just review them and let me know
 25 when you've reviewed them.

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1 A. Yes, indeed.

2 Q. Do you think that's a fair and accurate representation
3 of what is in the Board briefing?

4 A. On reflection, I think this is far too abridged.
5 I think that there are, as we've discussed, issues
6 within the Board briefing pack that would or could have
7 been brought out more clearly in this note. The
8 context, I suppose, is there was enormous pressure to
9 get something out very quickly and, in those
10 circumstances, the note, which I believe was prepared by
11 Rod, at either my initiation or Lesley's initiation,
12 was -- did not bring out fully those concerns.

13 I suppose the context, again, is that the Board
14 briefing, nonetheless, was meant to be read by the
15 Board. It was a very, very intensive exercise to reduce
16 what was a very long document to a very short document.

17 Q. We saw in minutes before that the Board and, certainly,
18 Sparrow subcommittee was concerned with remote access.
19 In that context, can you explain why the issues on
20 remote access that we referred to weren't included in
21 this, or is it simply a matter of time, you say?

22 A. I'm afraid I can't, and I believe it was simply a matter
23 of time. This process, towards the very end, if
24 I recall, was absolutely racing against the clock to get
25 something out and, also from recollection, I was under

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1 A. More highly Paula, less highly Alice, yes.

2 Q. Is that a positive recollection or --

3 A. No, I'm afraid it's not a positive recollection, no.

4 Q. Can we please turn to POL00031410. This is one of two
5 similar reports on Project Zebra, which I don't think
6 there is a material difference between, which you
7 identified in your statement, so I'm just going to this
8 one. Do you remember who was responsible for drafting
9 this report?

10 A. I believe but can't be sure it would have been done by
11 David Mason, who was the Head of Operational Risk or
12 Head of Risk, I think, within the Post Office. I would
13 have thought it was dealt with -- that input from
14 very -- a wide range of people, who I believe are
15 identified on the next page.

16 Q. It is your name on the end?

17 A. Correct.

18 Q. So you accept it's your --

19 A. Correct, yes.

20 Q. -- responsibility. Sorry, just to make sure that has
21 been put to you; you accept it's your responsibility for
22 this report?

23 A. Yes, the process within POL was that all documents
24 submitted to committees had to go in the name of an ExCo
25 member, as Dave Mason reported to me, it would have gone

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1 intense pressure from Paula, in particular, to get
2 something to the Board. So, to that extent, then, if
3 it's an oversight. With hindsight, I regret that this
4 was not as full a briefing as it should have been.

5 Q. When you had more time, did you provide a fuller update
6 to the Board?

7 A. I have no documents that show what happened after that
8 briefing was sent and the board meeting. I do know,
9 however, that there was detailed management discussion
10 internally as to the actions that should be taken on the
11 back of that board briefing and on the longer Deloitte
12 report.

13 Q. We'll come to that in a moment. Can I ask, do you
14 recall -- you don't have documents?

15 A. I don't have any documents.

16 Q. Do you recall discussing the Broad briefing with anyone,
17 any Board members, after sending it?

18 A. I don't have any recollection. I think it highly likely
19 that I discussed it with Paula and Alice but -- sorry,
20 that's Paula Vennells and Alice Perkins. But I'm afraid
21 I have no recollection.

22 Q. You say you think it's highly likely you discussed it
23 with Paula Vennells and Alice Perkins?

24 A. Yes.

25 Q. Is that --

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1 in my name and I would have reviewed its contents
2 I believe at the time and received comfort from him that
3 it was appropriate and accurate.

4 Q. Could we look at page 3, please, and if we go down to
5 the bottom, I understand this report was submitted to
6 the Risk and Compliance Committee on 21 July 2014; is
7 that right?

8 A. I don't have the date, I don't believe, from the -- that
9 could be right from the metadata but I don't have the
10 exact date.

11 Q. But do you accept it was discussed at the Risk and
12 Compliance --

13 A. It was discussed, yes.

14 Q. Do you remember who was in attendance at the Risk and
15 Compliance Committee, who would have discussed it?

16 A. No, I'm afraid I don't.

17 Q. We see A1, Summary of recommendation "Perform a detailed
18 review of Balancing Transactions use and controls; Yes".
19 So that was to look at remote access, effectively.

20 A. Correct.

21 Q. The business view was that that should be carried out?

22 A. Yes.

23 Q. What was done?

24 A. I'm afraid I don't know. That would have been taken
25 forward by the appropriate internal subject matter

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1 experts and I would have thought, but don't know, that
 2 would be the IT function, potentially also the finance
 3 function. I'm afraid I have no details, so I don't know
 4 the answer to that question.

5 **Q.** This was in the middle of the Mediation Scheme, wasn't
 6 it --

7 **A.** Indeed.

8 **Q.** -- and remote access was an issue that was being dealt
 9 with?

10 **A.** Yes.

11 **Q.** So was it not something you needed to keep on top of?

12 **A.** I would have thought that the Mediation Scheme -- this
 13 is a report in draft that's been considered by
 14 management. I would have thought it would be
 15 appropriate for management to conduct its review and for
 16 the output of that review to be disclosed to the
 17 Mediation Scheme. It's very common, I think, in large
 18 companies to receive reports and then undertake
 19 an internal assessment of that report and come up with
 20 management actions or clarify with the author of that
 21 report what the issues are, and then, once that's been
 22 done, to communicate that externally; and I would have
 23 thought that would have been the approach adopted here.

24 **Q.** The remote access, would you accept, is both relevant,
 25 we said, to the Mediation Scheme but also, potentially,

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1 structure and key controls, such as JSON sequencing. Not
 2 validated by parties outside of Fujitsu."

3 It refers to techniques that:

4 "... could allow POL to conduct a detailed risk
 5 analytics of Audit Store data ..."

6 Back to page 3, the business view was not to go
 7 ahead with that. It was considered to be a large
 8 exercise for which the benefit is questionable; can you
 9 recall why that was?

10 **A.** I'm afraid I can't and I believe that that would have
 11 been a business view very much informed by IT and
 12 Finance as to what was practicable or, indeed, possible
 13 at the time. But I'm afraid I have no recollection of
 14 the reasoning or the discussions that took place in that
 15 regard.

16 **Q.** Thank you. I want to move on to a different topic, it's
 17 Mediation Scheme. I'm going to jump about a bit in the
 18 chronology. I want to start, please, in your witness
 19 statement, if we can, page 75, paragraph 137.

20 You refer to a series of delays, which we'll come
 21 to:

22 "... which was a cause of great frustration to all
 23 those involved. Because of these difficulties an issue
 24 arose as to whether [Post Office Limited] should explore
 25 options for ensuring that the [Working Group] was able

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1 to past criminal convictions?

2 **A.** Correct.

3 **Q.** Was it not something you felt you should -- because it
 4 was relevant to those areas for you, it was something
 5 you needed to stay up to date with and ensure that this
 6 recommendation was being fulfilled or --

7 **A.** Yes, indeed, and I believe -- sorry, I have no papers to
 8 show what happened in terms of activities that followed
 9 this meeting. I would have thought, in the ordinary
 10 course of events, I would have been brought up to date
 11 as to what assurance activities had been undertaken
 12 internally and what activities were undertaken for the
 13 organisation to satisfy itself that Deloitte's findings
 14 were correct.

15 **Q.** To the best of your recollection, can you recollect --

16 **A.** I'm afraid I have no recollection of -- I have no papers
 17 that deal with the period immediately after it going to
 18 this Committee. Thereafter, actually, it's the papers
 19 I've been provided with stop, literally, at this point.

20 **Q.** If we look at this "Analytical Testing of Historic
 21 Transactions", and then at page 5 that's defined. It
 22 refers to the audit store documentation asserting that:
 23 "... the system holds seven years of branch
 24 transactions and system event activities. In addition,
 25 assertions over data integrity, record and field

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1 to do its job more effectively, whilst at the same time
 2 ensuring that the right balance was struck between the
 3 cost of running the scheme and making sure that those
 4 cases which had a realistic prospect of being
 5 successfully mediated were put through to mediation."

6 You are referring there, are you, to various
 7 discussions in Post Office to modify the scheme once it
 8 was in action?

9 If we could go to page 74, please, and if you could
 10 just put the table into view. In this table, what
 11 you're doing is, at various dates, showing Post Office
 12 Limited reports that it had conducted and sent to Second
 13 Sight, and the process was Second Sight would then
 14 review those and produce its report in response in broad
 15 terms, yes.

16 **A.** Yes.

17 **Q.** This table, you're saying, shows on the -- in the
 18 middle -- well, the left-hand column, under "Number of
 19 [Post Office Limited] reports", how many were sent by
 20 Post Office and the response on the right.

21 **A.** Mm-hm.

22 **Q.** We see by 27 March 2014, you say that six had been sent
 23 since the last Working Group, so at least ten --

24 **A.** Mm-hm.

25 **Q.** -- and there'd been no reports in response; is that

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- 1 right?
- 2 **A.** Yes, that's correct. I should give a slight health
3 warning on this table. It was difficult to put together
4 because of the way the minutes work, so it wasn't always
5 clear to me when I did this table exactly how many were
6 outstanding at any given date. But it's broadly -- it's
7 broadly correct, yes.
- 8 **Q.** Well, let's have a look at the minutes on 27 March, if
9 we can go to POL0026644, please. What happens with
10 some of these Working Group minutes is we have here the
11 attendance list and the fact that it was a meeting of
12 the Working Group, and it's only over the page that we
13 get the date of the meeting. So if we could go to
14 page 2, please, we see it's 27 March, so the Working
15 Group you were referring to where you said there were
16 six sent since the last Working Group meeting.
- 17 Can we look down to number 4, please. We see there
18 it says:
- 19 "Cases passed to Second Sight by Post Office."
20 There are six listed there. Are those the cases to
21 which you were referring?
- 22 **A.** I believe so but -- yes, I believe so, that's correct.
- 23 **Q.** On five of those it says, "To be uploaded to Huddle by
24 close of business 28 March"?
- 25 **A.** That is correct, yes.

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- 1 is fair to say that the date is clearly incorrect
2 because, as we saw from the minutes, clearly indicated
3 that the Huddle -- was to be uploaded to Huddle
4 I believe it said the next day, so -- I'm afraid I don't
5 have the minutes in front of me. So, directionally, at
6 the end of March, there was certainly a clear view from
7 recollection, within POL, that Second Sight were
8 significantly behind in the -- in their review of
9 reports.
- 10 **Q.** Because they had responded on -- responded on two and
11 asked for revisions out of a total of five?
- 12 **A.** Mm-hm, mm-hm, and progress was slow.
- 13 **Q.** Could we please look to POL00105528, and page 7,
14 please -- oh, sorry, page 4 first, so we can orientate
15 ourselves. We see this is a submission for the Sparrow
16 subcommittee on 9 April, so shortly after the 27th March
17 where we just were.
- 18 If we go to page 7, please. It says, "Broad options
19 for consideration", and sets out five, number 3 being:
20 "Significantly amend the scheme as published whilst
21 undertaking mitigating activities."
22 Yes?
- 23 **A.** Sorry, which bullet point are you referring to?
- 24 **Q.** Sorry, I'm looking at my bundle and not the screen. Can
25 we go to page 7, please. Do you see that now, the

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- 1 **Q.** Huddle was the document system which Post Office used to
2 send its reports to Second Sight; is that right?
- 3 **A.** Yes, yes.
- 4 **Q.** So is it actually the case that, by this meeting, since
5 the last, only one has been uploaded to Huddle for
6 Second Sight to review?
- 7 **A.** I think that's correct, yes, and, as I said when doing
8 the table, it was a bit difficult to figure out exactly
9 what happened on what date but the date of this meeting,
10 I believe, was 27 March.
- 11 **Q.** 27 March?
- 12 **A.** Yes, so I'm a day out, I'm afraid.
- 13 **Q.** So if we can go back to your statement, please, at
14 page 74. By March, should that then be one had been
15 sent since the last Working Group, so at least five?
- 16 **A.** Yes, on that date, yes.
- 17 **Q.** By that point, Second Sight had been asked to revise two
18 of their reports. They produced two and had been asked
19 to revise them. At that stage, it hadn't produced it
20 but it was also working on the Part 1 briefing report,
21 as well, a more generic report; is that right?
- 22 **A.** Yes, I believe so.
- 23 **Q.** So is it fair to say, at this stage, Second Sight
24 weren't significantly behind on report writing --
- 25 **A.** No, I don't believe that is fair to say. I believe it

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- 1 "Significantly amend the scheme?"
- 2 **A.** Yes, I do.
- 3 **Q.** Could we please turn to page 9. You see in the middle:
4 "Subject to a satisfactory outcome from the Deloitte
5 assurance assessment, it is recommended that:
6 "The subcommittee authorises in principle (and in
7 principle only, at this stage) Option 3 --
8 ie significant amendment to the Scheme as published,
9 whilst undertaking mitigating activities. The actions
10 necessary to take this forward are set out in appendix
11 A."
12 Now, can you recall what Option 3 entailed? We can
13 go to the Appendix if you require.
- 14 **A.** Yes, please.
- 15 **Q.** It is page 12, please. You see it says:
16 "The scheme is closed down as quickly as possible."
17 It goes on to say:
18 "The Working Group is disbanded and Second Sight's
19 role is terminated. All work underway to investigate
20 claims by Post Office continues, but use of external
21 advisers is minimised."
22 Presumably that's not referring to Post Office
23 Limited's external advisers?
- 24 **A.** I'm not sure what that's referring to, "All work ... of
25 external advisers is minimised". I wouldn't know, at

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1 today's date, what that reference is.

2 **Q.** It says:

3 "Mitigating activities may compromise the production

4 and publication reports into any improvements identified

5 as a result of the scheme, discussing conclusions with

6 each applicant, offices of payment of inconvenience

7 fees."

8 At the end, it says:

9 "The Working Group Chairman is retained to provide

10 independent oversight of investigation process."

11 Was this, in effect, saying that Second Sight's role

12 would be finished, it wouldn't be involved in the

13 investigation, and the investigation would be done

14 in-house by Post Office.

15 **A.** Well, the -- I believe that this is suggesting that, at

16 least, Second Sight's role be reduced. I'm not sure,

17 with the question that you've just asked about their

18 investigatory activities. It was clearly a headline

19 option for further consideration. So some of the

20 detail, I would have thought, needed to be worked out at

21 a later date.

22 **Q.** So where it says in that box, "The Working Group is

23 disbanded and Second Sight's role is terminated".

24 **A.** Yes. Sorry, yes -- sorry, I'm confusing myself. Second

25 Sight's role was terminated as part of the Working

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1 **Q.** -- second Sight aren't involved?

2 **A.** They don't undertake that activity. That's correct,

3 yes.

4 **Q.** Would you accept that that proposal lacks both fairness

5 and transparency?

6 **A.** I believe that it should be informed by the context of

7 this paper, which was an options analysis, and it was

8 there to put a whole range of different options on the

9 table for consideration by the committee.

10 **Q.** But this option was being proposed, as the option to go

11 ahead with.

12 **A.** And that, I believe, was in response to a Board, either

13 a Board request or a subcommittee request, to have

14 an all options paper prepared.

15 **Q.** Well, my question was: does this option lack fairness

16 and transparency?

17 **A.** It does lack fairness as regards, or public perception

18 of fairness, as regards those in the scheme. I'm not

19 sure that transparency is an issue that I -- I don't

20 really understand that component of your question but

21 I would have thought that it does --

22 **Q.** Did you prepare this document?

23 **A.** No, this document was prepared by a team of people

24 involved in the mediation support group, the team that

25 was responsible for the mediation.

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1 Group, yes.

2 **Q.** So it wouldn't be involved in investigating --

3 **A.** I don't -- I'm not sure when this thing was subsequently

4 worked up, there would have been a further consideration

5 as to what role they had, if any, going forward. But

6 I believe this option was fundamentally one which

7 involved not having Second Sight continuing the

8 activities that they were currently engaged in.

9 **Q.** Which was to investigate the --

10 **A.** I don't -- I think the role of Second Sight, as it

11 finally became to be documented in their engagement

12 letter, was not one of, quotes, "investigation", it was

13 to look at the points of difference between the POL's

14 assessment of a case, the subpostmasters' assessment of

15 the case, identify the points of difference between the

16 two, and investigate those points of difference.

17 I think that's quite different, to my mind anyway, from

18 a broad-based investigation from a zero base of any

19 case. That's quite a focused investigation --

20 **Q.** But it's an independent third party who is looking at

21 the party's positions and investigating the points of

22 dispute between them?

23 **A.** Points of difference, correct.

24 **Q.** This is suggesting that --

25 **A.** Correct.

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1 **Q.** So if you look here at 3, at the pros, you see quick and

2 simple, limits operating costs. I don't need to read

3 them all.

4 In the cons, the penultimate one is:

5 "Could lead to accusations of a Post Office

6 whitewash."

7 **A.** Yes.

8 **Q.** If we go to the next page, please. This is the option

9 for modifying the scheme to streamline the process,

10 adopting changes to governance. We see at the top that

11 Second Sight to act as an expert adviser to Working

12 Group.

13 In the pros it says fairness and transparency.

14 **A.** Mm.

15 **Q.** Is it fair to say that, you and others at Post Office,

16 were well aware that terminating Second Sight's

17 involvement at this stage would lack fairness and

18 transparency?

19 **A.** At that point in time, which is dated -- are we in

20 April? I believe we're in April, are we, with this one?

21 That's correct, yes. Certainly, fairness.

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

23 Please could we turn to POL00006571. If we scroll

24 down, please, at (c):

25 "The Committee reviewed the status of the Mediation

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1 Scheme and the urgency of any decision if it meant
2 moving away from the current position (Option 1). The
3 Committee agreed that Option 3 would be its preferred
4 option subject to the Minister's support and there being
5 a low probability of a successful application for
6 a Judicial Review."

7 Could you just provide some background there as to
8 what the perceived risk of judicial review was?

9 **A.** Sorry, can you please scroll back to the date of that
10 meeting?

11 **Q.** Yes, of course. If you go to the top of the document,
12 please.

13 **A.** Right. So my understanding or recollection is that
14 this, say, these are minutes of a meeting which was held
15 to discuss various options relating to the scheme. I'm
16 not sure whether this relates to the previous document
17 that you've just displayed on the screen or whether it
18 relates to a subsequent document, which is a much more
19 detailed document setting out different options.

20 I suspect it's the subsequent document it relates to.

21 **Q.** Can you recall at this point what was the view of the
22 Project Sparrow subcommittee; was it to terminate Second
23 Sight's involvement or to minimise it?

24 **A.** So, if I recall, and I'm afraid I don't have the
25 document reference in front of me, there was a document

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1 "3. Completing Post Office investigation in each
2 case and a moving the governance and management of the
3 Scheme in-house (ending Second Sight's engagement and
4 dissolving the Working Group)."

5 **A.** Yes, indeed, yes. That's the document. I think this is
6 the document that makes clear that it's a challenging
7 call and all options are suboptimal.

8 **Q.** So if we could go back, please, to the minutes of the
9 meeting, that's POL00006571, and to the second page,
10 please. It says:

11 "Subject to further legal advice on risk of Judicial
12 Review, the Chairman would explore [I think it should
13 be 'explore'] with the Minister the extent to which she
14 would be prepared to support Option 3 and explain the
15 alternative approach of Option 2 as a fallback ..."

16 So at this point is it Post Office Limited's
17 position that it wanted to terminate Second Sight's
18 involvement?

19 **A.** I think that's overstating what's set out in the
20 minutes. So I'm talking here from -- only on the basis
21 of what's set out in the minutes but it seems to me that
22 those minutes are saying there are two options. One is
23 dependent on ministerial support or both the minutes are
24 dependent on ministerial support but one, in particular,
25 is dependent on the receipt of JR advice.

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1 subsequent to the one that you've previously displayed
2 on the screen showing various options for the
3 subcommittee in a more formal sense. I believe that's
4 the one -- and I'm afraid I could be wrong because I'm
5 doing this is from memory -- that talks about some very
6 challenging calls potentially needing to be made.

7 If it relates to that document, that's a more formal
8 document that sets out several different options. It
9 explains that each one is suboptimal and goes on to
10 explain that there are two semi-preferred options. One
11 is to bring it -- assert control over the scheme within
12 its terms of reference; and another one is an option to
13 effectively bring the scheme to some sort of conclusion.

14 **Q.** Well, let's bring up that document, it's --

15 **A.** I'm sorry I may be confusing documents, I'm terribly
16 sorry.

17 **Q.** No, I'll take you to it. It's POL00022128?

18 **A.** So, to be clear, my recollection is these minutes don't
19 relate to the document that you've just shown.

20 **Q.** Understand. If we look at page 3, please. You see
21 Option 1 is continuing with the scheme as currently
22 configured and managed.

23 **A.** Mm-hm.

24 **Q.** "2. Continuing with the Scheme but to refine its work
25 within the existing Terms of Reference ...

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1 **Q.** But, reading these minutes, if the judicial review
2 advice had come back and said, there's low risk of
3 a judicial review if you terminate Second Sight's
4 involvement, would Post Office's position have been that
5 the preferable option would have been to terminate
6 Second Sight's involvement?

7 **A.** I believe the paper contained further process steps that
8 needed to be taken should that occur. There was,
9 I think, a deeper request for a deeper analysis of the
10 PR implications, which would have been Mark Davies, and
11 there were some other procedural steps in there which
12 I'm afraid I can't recall, but the subject -- subject to
13 those procedural steps and subject to the Minister being
14 supportive and subject to the risk of judicial review
15 being considered acceptable, I suppose, ultimately,
16 subject to the Board agreeing this, that was the
17 proposal on the table at that time, yes.

18 **Q.** Again, would you accept at this point that decision
19 lacked fairness and transparency, by removing Second
20 Sight?

21 **A.** So should that course of action have gone ahead and
22 should everybody have considered that's right, yes,
23 I would consider that the -- certainly, the fairness
24 element could be challenged; definitely, could be
25 challenged. It would be perceived -- and I think that

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1 is stated in the paper itself, this could be perceived
 2 to be considered unfair.

3 **Q.** Was it the case that Post Office Limited wanted to
 4 terminate Second Sight's involvement because it was
 5 investigating the points of dispute between it and
 6 subpostmasters?

7 **A.** No, I believe, at that stage, there were -- from
 8 recollection, at that stage, there were numerous issues
 9 on the table with the engagement with Second Sight. So
 10 I suppose the first of those issues was that there was
 11 no agreed engagement letter with Second Sight, and there
 12 was a tension between what was the Post Office's
 13 position and what was explained to me upon joining, as
 14 being the Post Office's position, which is that Second
 15 Sight were to focus solely on cases within the scheme,
 16 and Second Sight's position that their remit extended
 17 beyond that.

18 It was colloquially sometimes referred to as Job 1
 19 and Job 2. I think, at the stage this paper was
 20 written, there was a very strong sense by Second Sight
 21 that they had a brief to continue to explore everything,
 22 the entirety of matters that were referenced in their
 23 first report.

24 **Q.** The Interim Report?

25 **A.** Correct, yes, the interim report, sorry -- and that did
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1 I believe it was more a matter -- and this was -- sorry,
 2 I'm getting my timelines confused -- at a later date
 3 certainly, informed by the Linklaters advice, that
 4 Second Sight were not approaching their conclusions in
 5 an evidence-based manner, that they were commenting on
 6 matters (a) that were outside their field of expertise
 7 and (b) which were not supported by sufficient evidence.

8 So I think that feeling within the Post Office more
 9 generally had emerged by the time of this meeting. So
 10 there were, I suppose the point I'm trying to convey in
 11 response to your question is that there are a number of
 12 separate factors -- I'm hypothesising slightly --
 13 crossing the minds of the board members that were making
 14 the decisions at the meeting.

15 **Q.** I just want to pick up on one of those briefly before
 16 moving on and this is the point you referred to as to
 17 Job 1?

18 **A.** Yes.

19 **Q.** That's the Interim Report, and you're saying that Second
 20 Sight were suggesting that they needed to continue that
 21 work?

22 **A.** Yes, and I believe that was based on an honestly-held
 23 belief that they were mandated by the MPs to continue
 24 with their investigation work and I think, as I've
 25 referenced in my statement, there was a strong concern
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1 not necessarily, as explained to me, the Post Office's
 2 position -- explained in very, very clear terms to me
 3 that the Post Office saw Second Sight solely, at this
 4 point in time anyway, as being responsible for being
 5 involved with matters and reviewing cases within the
 6 scheme. So I think that's the first point of
 7 difference.

8 I think the second point of difference was that
 9 there was a strong sense within the Post Office at that
 10 point that Second Sight were not providing value for
 11 money and that was a matter which, rightly or wrongly,
 12 was seen to be very significant in the Board's mind.

13 The third point, I think, is perhaps one around
 14 balance or impartiality, or whatever one wants to call
 15 it, but let's call it balance, that the strong sense
 16 that, certainly, I was imparted -- was imparted to me by
 17 Post Office was that Second Sight were not approaching
 18 the work that they were undertaking in relation to the
 19 scheme in a balanced manner but more in a campaigning
 20 manner. Whether that's correct or not, you know, is for
 21 others to judge, but that was certainly the sense that
 22 was imparted to me.

23 **Q.** Was it that Second Sight were disagreeing with what the
 24 Post Office said?

25 **A.** I don't believe it was a matter of disagreement.
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1 (a) that that work was not documented and (b) the scope
 2 of that was not clear. But, most importantly, I think,
 3 as was conveyed to me by Paula Vennells, that was not
 4 the agreed position and it was not the position that she
 5 had agreed with now Lord Arbuthnot, James Arbuthnot MP
 6 at the time.

7 **Q.** They produced an interim report. Do you think it was
 8 fair for them to assume they may go on to produce
 9 a final report?

10 **A.** I don't -- it may have been something within their
 11 contemplation it may have been within contemplation at
 12 the time they did the interim report. That was not
 13 something that was conveyed to me as being -- something
 14 that they were doing for that year, during 2014. In
 15 2014 their focus was on -- and I've very clear
 16 instructions on this -- their focus was to be on working
 17 on matters relating to the scheme and the scheme only.

18 **Q.** Well, let's have look at that, POL00099977, please. It
 19 says:
 20 "At the meeting on 27th November ..."
 21 I will come to show this note attributed to you and
 22 Belinda Crowe. There's no year on it but, given it's
 23 covering costs of Project Sparrow and a note on the
 24 Second Sight contract and protection for business,
 25 an NDA provision, that's likely to be 27 November 2013;
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1 would you agree?

2 **A.** Yes, I agree. That looks like 2013.

3 **Q.** Can we turn the page please, page 2, down to "Second
4 Sight". It says:

5 "The contractual arrangements with Second Sight are
6 set out in the terms of reference for the independent
7 review ..."

8 Pausing there, that's the review that had been
9 commissioned that led to the interim report.

10 **A.** Correct.

11 **Q.** So, at this stage, in November 2013, the contractual
12 arrangements with Second Sight are still in accordance
13 with the terms of reference for that interim review?

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

15 **Q.** It says:

16 "As the role of Second Sight and the nature of their
17 work in relation to the Mediation Scheme has now changed
18 has become more clearly defined, we will, in the very
19 near future, be putting in place new contractual
20 arrangements."

21 Had anyone said to Second Sight at this point that
22 the terms of reference that had been assigned to them
23 for the independent review had now come to an end and
24 been superseded by the Mediation Scheme?

25 **A.** I'm afraid I don't know. Belinda and I were five weeks
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1 terminated, I think, or subject to various caveats, you
2 said.

3 **A.** Yes.

4 **Q.** So that was discounted because of the risk of
5 a challenge and possible judicial review.

6 So option 2, amending the scheme, was, I think if we
7 turn over, the one that the Board decided to go ahead
8 with.

9 Based on your recollection of the conversation at
10 that time, if, say, the Post Office had received advice
11 that the risk of challenge of a judicial review wasn't
12 material, would the Board have gone ahead with Option 3?

13 **A.** I think I say in my witness statement -- and this is
14 speculation because, clearly, I don't know the state of
15 the Board's mind -- that Option 3 represented very
16 significant -- and this is outside my area of
17 competence, I should say, very significant PR risks for
18 the Post Office. I think, ultimately, once they had
19 been properly considered, I think the Board would have
20 found it very challenging to move down the route of
21 option 3, not to discount it entirely, but it would --
22 it would have been a very challenging decision for them
23 to make, to move down to Option 3. Sorry, that's
24 a personal view and it's not based on a fact or any
25 specific information.
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1 into the job at that point and I believe that we would
2 have been told at that point that the nature of their
3 work had changed and that they were now to focus on the
4 scheme. That would be consistent with what's been
5 written there.

6 **Q.** Who told you that?

7 **A.** It would have been a combination of Paula and/or
8 Alice -- sorry, Paula Vennells and Alice Perkins.

9 **Q.** So, in essence, you took it from Paula Vennells or Alice
10 or both that Second Sight's involvement with the
11 original terms of reference, namely looking at whether
12 there are systematic issues, had come to a close?

13 **A.** Had either come to a close or had been paused for the
14 duration of the scheme.

15 **Q.** That document can come down. Thank you.
16 Just one more document on this topical very quickly,
17 please. It's POL00021526. It's a meeting of the Board
18 on 10 June 2014. If we could go down, please -- sorry,
19 I should say we see you're in attendance as well.

20 **A.** Yes, by telephone, by the looks of it.

21 **Q.** If we go down further, please. So we're back to the
22 options we had before:

23 "Option 1 (continuing as is) was untenable ..."

24 **A.** Mm-hm.

25 **Q.** Option 3, this was the one where Second Sight were to be
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1 **Q.** That document can come down. Thank you.
2 Final topic, which I will deal with very briefly,
3 also on the Mediation Scheme. Please could we bring up
4 POL00199361. So this is a draft settlement policy,
5 version 1.4. Was this policy, although it's in draft,
6 what was used in practice in the Mediation Scheme?

7 **A.** I don't know whether this policy was used or
8 a subsequent draft. Certainly, the principles upon
9 which this policy was based were set prior to my joining
10 the Post Office, and they were ones based on
11 liability -- contractual liability for loss.

12 **Q.** Can we please turn to page 16. Sorry, that's it. Thank
13 you. On "Settlement Thresholds", nature of complaint:
14 "Horizon inaccurately records data/transactions."
15 It says:
16 "Second Sight's Interim Report found that there were
17 no systemic errors in Horizon.
18 "As such, very clear proof will be required of
19 a technical defect in Horizon along with evidence that
20 a technical defect caused a quantifiable financial loss
21 in the applicant's branch accounts and had a material
22 adverse effect on an applicant."
23 Why was the threshold set so high -- "very clear
24 proof required of a technical defect" -- in order for
25 Post Office to make an offer of settlement?
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1 A. So my recollection is that the principles underlying
 2 this were set prior to my arrival at the Post Office.
 3 Q. You were the General Counsel overseeing the legal work
 4 on the Mediation Scheme?
 5 A. Mm-hm.
 6 Q. This was a policy over which you had oversight, yes?
 7 A. And in conjunction with the -- Chris Day, who was the
 8 Finance --
 9 Q. Yes, I'm sure other people, but you had oversight of
 10 this?
 11 A. Yes.
 12 Q. So you could have changed it if you wanted?
 13 A. No, I don't believe I could have changed this if
 14 I wanted to. This was a policy which was adopted
 15 generally by, I think, the ExCo, so this was a matter of
 16 suggesting changes that would be adopted elsewhere or
 17 approved elsewhere. Perhaps "adopted" is the wrong
 18 word.
 19 Q. Well, help with this, please. The interim report set
 20 out preliminary conclusions, didn't it?
 21 A. Correct.
 22 Q. It said that Second Sight had found no systemic errors
 23 within Horizon but that it hadn't completed its
 24 investigations, effectively?
 25 A. Correct.

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1 Q. Yes, sorry, but the point being that report would come
 2 after --
 3 A. Yes, indeed --
 4 Q. -- the claims had been resolved?
 5 That point being that, after the claims being
 6 resolved, the new report would -- sorry, I'll start that
 7 again.
 8 Second Sight would focus on, I think your evidence
 9 is, individual applicants in the scheme and, at a later
 10 stage, may produce a public final report?
 11 A. Yes, that was a possibility and I don't know whether
 12 a decision -- at what point a decision was made, if
 13 indeed one was ever made, as to whether they should
 14 produce a final report or not.
 15 Q. So can you explain why the threshold for whether
 16 a settlement would be offered in the scheme was based on
 17 an interim report, which didn't come to final
 18 conclusions?
 19 A. Other than the fact that that was the only evidence
 20 available at the time that these were prepared, no,
 21 I can't. I can't say why it was based on an interim
 22 report. As there was no -- I suppose the answer is
 23 there was no subsequent report to base this on.
 24 I perhaps should also say that the -- my
 25 understanding of this is it reflected the general policy

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1 Q. You said earlier in your evidence that Post Office's
 2 position was that Second Sight should now be focusing on
 3 matters within the scheme, so the disputes between
 4 individual --
 5 A. Correct, yes.
 6 Q. Post Office took an active role in trying to stop Second
 7 Sight from producing a public report, akin to a final
 8 report of Second Sight -- of the interim report; is that
 9 fair?
 10 A. Sorry, I'm not sure --
 11 Q. I'll rephrase that. When you were negotiating the terms
 12 of engagement for Second Sight in the Mediation Scheme,
 13 you were seeking to avoid a public report akin to
 14 a final report?
 15 A. No, I don't think that's fair at all. My -- for the
 16 purposes of the scheme, my very clear directions were to
 17 ensure -- and this, I think, was from the Board --
 18 ensure that there were terms of engagement for Second
 19 Sight on the scheme, and that -- and also to build in
 20 certain confidentiality provisions. And the direction
 21 certainly from Alice and Paula was that they should
 22 focus on the scheme. I don't think that went to say
 23 that they shouldn't do a subsequent report after the
 24 scheme had finished, or that a further report shouldn't
 25 be produced at some point.

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1 direction that the settlement sums were never intended
 2 to be -- sorry, this is not my intention, it's the
 3 intention or direction given by others when I joined --
 4 settlement sums were never intended to be large. They
 5 were intended to be small sums of money, more of the
 6 nature of an apology, something of that nature. So that
 7 perhaps policy direction informed the setting of the
 8 thresholds.
 9 Q. Well -- and this will be the final topic for me -- can
 10 we bring up POL00116285, please.
 11 We see you send an email to Paula Vennells in
 12 February, 23 February 2014 and it's saying you're going
 13 to comment below and, if we go down, we see there there
 14 is Paula Vennells' original email and I understand your
 15 comments are in red; is that right?
 16 A. I believe so, yes.
 17 Q. If we could turn the page, please, go to 3.6. So this
 18 is commenting on, I think, paragraph 3.6. It says:
 19 "Potential cost £10 million+ serious. When we went
 20 into this ..."
 21 "This", is that the Mediation Scheme?
 22 A. Sorry, I'm not with you. Which paragraph?
 23 Q. Sorry, again, I'm looking at -- it's the top there, 3.6,
 24 "Potential cost 10 million+ serious". It says:
 25 "When we went into this, the motivation (Alice and

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1 me) was to find out what was really going on to create
2 so much noise and to put in place processes that we felt
3 were closer to the way we wanted [the Post Office] to be
4 run (more supportive) going forwards. The system that
5 was in place at the time was when we were a division of
6 [Royal Mail] and accountable to their Legal and Security
7 [Divisions]."

8 It goes on to say:

9 "We did not intend it to result in major
10 compensation for policies that were followed and applied
11 to thousands of others who did not have problems, and
12 which were operating in a different corporate context.
13 We seem to have lost this focus and I am looking for
14 advice on how we regain it."

15 So you earlier referred to a message about
16 compensation, I think. Is this the message you were
17 referring to?

18 **A.** I think it's one of a number of messages, that -- this
19 is the only one that's in -- there may be more in my
20 bundle but this is the key one in my bundle. It's
21 the --

22 **Q.** Please --

23 **A.** Sorry --

24 **Q.** No, please?

25 **A.** -- I believe that, subsequently, the figures were

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1 hear them all. So it would involve each of them being
2 strictly confined to five minutes, which my experience
3 tells me is very unlikely.

4 So how are we going to deal with this? My preferred
5 solution -- and this is addressing you, Mr Aujard -- we
6 have Ms or Mrs van den Bogerd scheduled for two days,
7 and we may well run up against a problem of time, even
8 with two days. So I would not ask you to come back
9 tomorrow but I would ask you to come back at some
10 convenient time when it's clear that we can fit you in
11 with some other witness but I don't want to make life
12 too intolerable for you, but how does that sound?

13 **THE WITNESS:** Sir, if you're asking for an honest view, my
14 honest view would be, yes, I would rather do as much as
15 I possibly can today but I appreciate that the Inquiry's
16 needs come first, so I would accommodate whatever the
17 Inquiry wants in this regard.

18 **SIR WYN WILLIAMS:** Well, first of all thank you for your
19 honesty. I've got no doubt that everyone would prefer
20 to get it over with and I accept that but I have to
21 balance being fair to you with being fair to those who
22 wish to question you --

23 **THE WITNESS:** Yes, yes.

24 **SIR WYN WILLIAMS:** -- and also fair to the person
25 transcribing and, lastly, as I've said on a number of

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1 extrapolated upwards from £10 million plus to, on one
2 occasion there was one figure of £50 million, there was
3 an early estimate or estimate after this but later than
4 others that was up to £100 million of compensation. So
5 there were some very, very large numbers, which,
6 clearly, caused the Board, I imagine, a great deal of
7 concern.

8 **Q.** What was the message coming from Paula Vennells and
9 Alice Perkins to you about the level of compensation
10 they envisaged being paid to subpostmasters at this
11 stage?

12 **A.** That it would be small sums of money. It would be less
13 than three months of a subpostmaster's contractual
14 entitlement, though if there were exceptional
15 circumstances, that could be increased. At a later
16 date, I believe there were additional heads of
17 compensation added, which included an apology and --
18 sorry, there was another one which I can't quite
19 remember. So they were small sums of money.

20 **MR STEVENS:** Thank you, sir. That concludes my questions.
21 We have questions from Core Participants, which
22 hopefully we can hear now.

23 If I could just take a look around the room. Four
24 sets of Core Participants, sir, wish to ask questions.

25 **SIR WYN WILLIAMS:** Well, I'm dubious about whether we'd can

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1 occasions, when I start at 9.45 or 10.00, by 4.30 my
2 powers of concentration are waning, to say the least.
3 So I need to balance it all. So what I propose to do,
4 as I say, is not to ask for any more questions but to
5 find a mutually convenient date when you can be brought
6 back for up to about an hour, maximum, when all those
7 who wish to ask you questions will have the opportunity
8 to do so.

9 So thank you for coming today and I'm sorry it's not
10 over. Because there is some delay, probably, between
11 when you come back and today, I'm not going to say to
12 you please don't talk to anyone about your evidence.
13 I haven't embargoed people in your position like that
14 previously. So I'm not going to do it with you and, as
15 I say, I'll see you when we can fit you in conveniently
16 for everyone.

17 **THE WITNESS:** Thank you, sir.

18 **SIR WYN WILLIAMS:** Right, Mr Stevens. So we start again
19 tomorrow at 9.45 with Ms van den Bogerd. I'm sorry if
20 I mispronounced her name. That probably demonstrates my
21 powers of concentration are waning.

22 **MR STEVENS:** Sir, yes. 9.45 tomorrow.

23 **SIR WYN WILLIAMS:** Yes, see you then.

24 **MR STEVENS:** Thank you.

25 **(4.12 pm)**

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1 (The hearing adjourned until 9.45 am the following day)

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