

Tuesday, 4 June 2024

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2 (9.45 am)
3 MS HODGE: Good morning, sir, can you see and hear us?
4 SIR WYN WILLIAMS: Yes, I can, thank you very much.
5 MS HODGE: Sir, our witness today is Mr Christopher Day.
6 SIR WYN WILLIAMS: Yes.
7 MS HODGE: Please could the witness be sworn.
8 CHRISTOPHER MARK DAY (sworn)
9 Questioned by MS HODGE
10 MS HODGE: Good morning, Mr Day. As you know, my name is
11 Ms Hodge and I will be asking questions on behalf of the
12 Inquiry.
13 Please could you give your full name.
14 A. Christopher Mark Day.
15 Q. You should have in front of you a hard copy of a witness
16 statement dated 19 April 2024. Do you have that before
17 you?
18 A. I do.
19 Q. That statement should run to 49 pages, including
20 an index of exhibits; is that correct?
21 A. It is.
22 Q. Could I ask you, please, to turn to page 41 of your
23 statement. At the top, there's a statement of truth
24 and, underneath, a signature; is that your signature?
25 A. It is.

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1 a more commercial focus to the business's Financial
2 Division; is that right?
3 A. I believe that's the case, yes.
4 Q. Is that something which you recall Ms Vennells raising
5 with you at the time of your appointment?
6 A. I do. I recall her referring to what she called the
7 "primacy of finance", which was that she wanted Finance
8 to take a more proactive role in the management of the
9 Post Office, and the context for that was that we were
10 keen to move to a situation where the Post Office broke
11 even and was no longer dependent on public subsidy.
12 Q. How would you describe the financial performance of Post
13 Office Limited when you took on the role of CFO?
14 A. Well, I think it was a large and complex organisation.
15 It was still loss-making at that point. We had various
16 elements of the business that we were working on to
17 increase profitability, one notable one would be the
18 Crown estate, where we had a very clear plan to drive it
19 back to profitability.
20 Other elements of the estate were sort of large cost
21 centres, effectively, so very limited in terms of the
22 number of sub post offices that we could close, for
23 example.
24 Q. In your statement you describe the focus of your role
25 comprising three principal elements. You've identified

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1 Q. Is the content of the statement true to the best of your
2 knowledge and belief?
3 A. It is.
4 Q. Thank you. Mr Day, your statement is now in evidence
5 before the Inquiry. I'm going to ask you some questions
6 about matters arising in your statement but I don't
7 propose to take you through each and every topic that
8 you address there. Could I ask you, please, to begin by
9 briefly summarising your professional background before
10 you joined Post Office Limited?
11 A. Yes. My finance background started with working at
12 Beecham Plc as a graduate trainee in the Group Treasury
13 Department. I then moved into financial markets with
14 a US investment bank, before joining Diageo, where I had
15 succession of roles in corporate finance and capital
16 markets and then as an international Finance Director in
17 the Netherlands and Germany.
18 On returning to the UK, I joined the BBC as Group
19 Financial Controller and then I joined Post Office as
20 Chief Financial Officer in August 2011.
21 Q. Thank you. You explain in your statement that you were
22 appointed by and reported into the Chief Executive
23 Officer, Ms Vennells; is that correct?
24 A. That's correct.
25 Q. You have explained that you were recruited to bring

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1 the first being to drive the financial performance of
2 the business, as you've referred, the second being to
3 provide commercial support to the business and, thirdly,
4 to help the Post Office to compete on the provision of
5 Government services, with the aim of creating a business
6 which was no longer dependent upon public subsidy.
7 Those are the three aspects you've identified there; is
8 that right?
9 A. Correct.
10 Q. In a nutshell, was your task to support the CEO in her
11 efforts to make the Post Office a more successful
12 business?
13 A. Yes.
14 Q. Could you please describe your working relationship with
15 Ms Vennells?
16 A. We had a close collaborative working relationship and
17 I believe we worked well together. As I say, she was
18 keen to promote the financial discipline of the
19 organisation and that suited me, my purposes, very well.
20 It was good to work for a Chief Executive who had that
21 focus on the numbers and the financial performance.
22 Q. You've mentioned it was her desire for finance to take
23 a more proactive role in management. It's right, isn't
24 it, that you deputised for Ms Vennells on occasion when
25 she was on annual leave --

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1 **A.** Yes, from time to time I would deputise for her.
 2 **Q.** -- and that therefore your role, certainly then, and
 3 I think you accept, extended more broadly than simply
 4 dealing with financial matters?
 5 **A.** Yes.
 6 **Q.** I'd like to ask you some brief questions about your
 7 responsibilities as CFO. Would it be fair to say that
 8 there were two principal aspects to that, one of which
 9 related to the external financial reporting of the
 10 business?
 11 **A.** Yes, that was my primary focus.
 12 **Q.** You've explained that it was your duty as CFO to ensure
 13 that all of the company's annual financial statements
 14 were true, fair and accurate -- is that correct --
 15 **A.** Correct.
 16 **Q.** -- and that the independent annual financial audit was
 17 conducted properly?
 18 **A.** Correct.
 19 **Q.** During your tenure as CFO, the firm which performed that
 20 independent audit of POL was Ernst & Young; is that
 21 right?
 22 **A.** It was.
 23 **Q.** The other aspect of your role, so the other principal
 24 aspect, related to the day-to-day management of the
 25 business's financial accounting, budgeting and planning;

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1 a member of his team, on your arrival; is that right?
 2 **A.** Yes, I don't recall precise conversations but I'm sure
 3 they would have taken place early in my tenure.
 4 **Q.** I think it's at paragraph 38 of your statement, please,
 5 WITN10000100. It's on page 12, please, paragraph 38.
 6 The penultimate sentence reads:
 7 "As CFO, I was expected to have a general
 8 understanding of how [Post Office Limited] accounts for
 9 transactions in branches and by product type, for the
 10 purpose ultimately ever ensuring the reliability of
 11 POL's financial statements."
 12 Presumably, at a minimum, you would have understood
 13 that Horizon was a point of sale and financial
 14 accounting system that was operated and maintained by
 15 Fujitsu Services?
 16 **A.** Yes, I would.
 17 **Q.** You would have been aware that the system was used in
 18 the Post Office branches to process and record each
 19 transaction performed at the counter by a subpostmaster,
 20 a manager and assistant, for example?
 21 **A.** Yes, I would.
 22 **Q.** You would have also been aware, I assume, again at
 23 a minimum, that those transactions processed and
 24 recorded by Horizon were transmitted to Post Office's
 25 back office accounting systems?

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1 is that right?
 2 **A.** Correct.
 3 **Q.** One area of the business for which you were responsible
 4 was the Product and Branch Accounting Division; is that
 5 right?
 6 **A.** Yes.
 7 **Q.** You've explained in your statement that Product and
 8 Branch Accounting performed the back office accounting
 9 function of the business; is that right?
 10 **A.** Yes, essentially, it reconciled the client accounts with
 11 the customer accounts.
 12 **Q.** It provided you with the aggregated data and information
 13 which you needed to produce the Post Office's annual
 14 financial reports?
 15 **A.** Yes.
 16 **Q.** Would it be fair to say that Product and Branch
 17 Accounting, therefore, served an essential role in
 18 helping you to meet your obligations for financial
 19 reporting?
 20 **A.** Yes.
 21 **Q.** During your tenure, the Division was led by Rod Ismay;
 22 is that right?
 23 **A.** Correct.
 24 **Q.** In your statement, you say you would have been briefed
 25 about the Horizon system by Mr Ismay, or possibly by

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1 **A.** Yes.
 2 **Q.** There, as you've said, they would be checked and
 3 reconciled against data provided to the Post Office by
 4 its clients?
 5 **A.** Correct.
 6 **Q.** Do you recall what you were told, if anything, by
 7 Mr Ismay about the contractual relationship between the
 8 Post Office and its agents?
 9 **A.** I don't, I'm afraid.
 10 **Q.** Were you aware at the time that you took on your role
 11 that Post Office and branch accounting were responsible
 12 for issuing transaction corrections to recover from
 13 subpostmasters accounting shortfalls shown by Horizon.
 14 **A.** I believe I would have been aware shortly after joining,
 15 either through conversations with Mr Ismay during my
 16 induction or having read the now called Ismay Report.
 17 **Q.** I will come on to that in a moment but, before I do, do
 18 you recall what you were told about that process of
 19 issuing transaction corrections?
 20 **A.** I don't.
 21 **Q.** It was shortly after you took up your role as CFO that
 22 you received an email and attachment from Mr Ismay,
 23 relating to challenges to the integrity of Horizon; is
 24 that right?
 25 **A.** Correct.

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1 Q. Could we, please, first turn up that email, which is at
 2 POL00294836. Thank you. So we see there it's an email
 3 from Mr Ismay to you, Mr Day, on 8 September 2011, so
 4 relatively shortly after you took up -- I think you said
 5 August 2011 was when you started in the role of CFO.
 6 The subject of the email is "Horizon Challenges",
 7 a report dated 2 August 2010, and the name of the
 8 attachment is "Horizon Integrity". Mr Ismay says:
 9 "Chris -- further to my last email, please find
 10 attached a report I did last summer for Dave Smith (then
 11 MD). It is a long report but that detail was agreed as
 12 necessary and I would be grateful if you could read it
 13 as context to the update I need to give you."
 14 Just pausing there, would it be fair to say that
 15 this wasn't simply a report that passed across your
 16 desk, it was something Mr Ismay wanted you to read and
 17 discuss with you.
 18 A. Yes.
 19 Q. He goes on to say then, in the third paragraph:
 20 "Mike Granville has had related stakeholder
 21 conversations ..."
 22 Do you recall Mr Granville's role?
 23 A. I don't recall his precise role. I think he was
 24 involved in a government communications, PR-type role.
 25 Q. It goes on to say:

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1 those had all been addressed at the time.
 2 Q. So is the answer you weren't concerned at all?
 3 A. I was aware of the challenges. I don't think I was
 4 unduly concerned.
 5 Q. You would have known, would you not, that, if the
 6 Horizon system lacked financial integrity, then the
 7 financial statements for which you were responsible
 8 might not be true, fair and --
 9 A. Absolutely.
 10 Q. In your previous roles, had you ever come across
 11 a situation like this before, where users of the
 12 business's accounting system were saying, "We believe it
 13 lacks financial integrity"?
 14 A. No, I hadn't.
 15 Q. It's your evidence that, I believe, you have no
 16 independent recollection of reading this report; is that
 17 correct?
 18 A. That's true. I'm sure I read it but I don't recall
 19 reading it.
 20 Q. And you don't recall whether you had any discussions
 21 with Mr Ismay, albeit this email does tend to suggest
 22 that he wished to discuss the matter with you?
 23 A. I think it's highly likely that I discussed it with him
 24 as part of my induction. I don't recall the precise
 25 conversation.

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1 "... and I expect you may have heard references to
 2 this area ..."
 3 By which he presumably he meant Horizon integrity,
 4 would you agree?
 5 A. Yes.
 6 Q. "... from Kevin, Paula, Susan or Mike."
 7 So he's assuming there, is he not, that this is
 8 a subject that you would have already discussed with
 9 directors of the company, the Chief Executive, General
 10 Counsel or Mr Granville?
 11 A. That's what he's saying, yes.
 12 Q. Do you recall whether you did, in fact, discuss the
 13 issue of Horizon integrity with any of those individuals
 14 named there?
 15 A. I have no recollection of discussing it with any of
 16 those individuals.
 17 Q. Were you concerned to be told, so early in your tenure,
 18 that the integrity of the system from which you'd
 19 derived your financial accounting data and information,
 20 was being challenged?
 21 A. My recollection is that the report was shown to me
 22 partly from Mr Ismay to describe the role that he was
 23 doing and the function of his team, but also clearly to
 24 alert me to the fact that there had been challenges to
 25 the integrity of the system but, as I understood it,

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1 Q. I'd like to explore with you what you thought or would
 2 have thought, based on your recollection at the time,
 3 about some of the issues that are raised in this report.
 4 Please could we bring up a copy of the report at
 5 POL00294837. So we see at the top there, as we know,
 6 this was a report that Mr Ismay produced for the then
 7 Managing Director, Dave Smith. There are various Senior
 8 Managers in the organisation who were copied into this
 9 report, originally produced just over a year prior. The
 10 title of the report is "Response to Challenges Regarding
 11 Horizon ... Integrity" and the first paragraph reads:
 12 "Post Office Limited has, over the years, had to
 13 dismiss and prosecute a number of subpostmasters and
 14 Crown staff, following financial losses in branches.
 15 A small number of these have made counter claims that
 16 they [are] not guilty of the charges made but that the
 17 Horizon system was faulty."
 18 Just pausing there, had you had any prior experience
 19 of working for an organisation which prosecuted its
 20 staff for financial losses suffered by the business?
 21 A. I hadn't, no.
 22 Q. You've explained in your statement that you did not know
 23 when you first joined the Post Office that it brought
 24 private prosecutions against its agents and its staff;
 25 is that right?

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1 A. Yes, I don't recall being aware at the time, although
 2 I can see it's indirectly referenced in this report.
 3 Q. So, by the time you read this report in early September,
 4 you would have been aware of that fact, would you not?
 5 A. I think it's highly likely that I was aware.
 6 Q. Knowing that the Post Office brought prosecutions in
 7 these circumstances, would that have affected the
 8 importance that you attached to the financial integrity
 9 of the business's accounting systems?
 10 A. Yes, I think it would.
 11 Q. Why?
 12 A. But I think -- I think my primary focus would have been
 13 on whether I, as CFO, could rely on the integrity of the
 14 system to verify the accuracy of the financial
 15 statements of Post Office. That would have been my
 16 primary focus.
 17 Q. In terms of wider risk to the business, however, would
 18 you have been concerned about the importance of
 19 financial integrity, bearing in mind that you knew that
 20 the business brought prosecutions in reliance on Horizon
 21 data against its agents and employees?
 22 A. I don't know whether I made that specific connection at
 23 the time.
 24 Q. The report goes on to say in the second paragraph:
 25 "Various lobbying groups have been set up by former

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1 It explains it includes an overview of Post Office's
 2 control environment; its response to accounting errors,
 3 which we've referred to as transaction corrections; its
 4 IT systems, so Horizon versus Horizon Online. Were you
 5 aware at this stage as to the existence of different
 6 iterations of the system, that is to say an earlier
 7 version which had been superseded by Horizon Online?
 8 A. I believe I would have known that Horizon Online had
 9 replaced Horizon in January 2010. That's probably the
 10 extent of my knowledge at that stage.
 11 Q. It refers there to the "resolution of known issues",
 12 under "IT systems".
 13 Thirdly, third party perspectives comprising court
 14 judgments, media and audit.
 15 Then, lastly:
 16 "Statistics on branch accounting issues, suspensions
 17 and prosecutions."
 18 Would you agree that that accurately summarises the
 19 focus of the report being on the Post Office's processes
 20 and controls, as opposed to, by contrast, Fujitsu's
 21 processes and controls?
 22 A. Yes, I would.
 23 Q. What you were not receiving in this report was a very
 24 detailed explanation of how Horizon operated at
 25 a technical level; is that fair?

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1 subpostmasters and these have at times received national
 2 media coverage and in some cases been taken up by local
 3 MPs. Most recently, Channel 4 has proposed a news
 4 article about this area."
 5 This suggests, does it not, that concerns about
 6 Horizon's integrity were not isolated to a few
 7 disgruntled subpostmasters who'd been convicted but had
 8 attracted the attention and support of Members of
 9 Parliament and the national media?
 10 A. Yes, it does.
 11 Q. Do you think that would have registered with you at the
 12 time as a significant area of risk for the business?
 13 A. I think the context for this would have been a knowledge
 14 of the size of the network and the relatively scarce
 15 incidents of such matters, but I think, in terms of
 16 peripheral vision, yes, I'm sure I would have had
 17 an awareness that there had been some media coverage,
 18 that there was some reputational risk to the Post
 19 Office.
 20 Q. If we continue, please, on to the following paragraph,
 21 the report defines its purpose there as being to
 22 provide:
 23 "... an objective internal review of [Post Office
 24 Limited's] processes and controls around the branch
 25 accounting."

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1 A. That's fair.
 2 Q. Therefore, to someone without a detailed technical
 3 background, it was nonetheless a relatively
 4 comprehensible report, was it?
 5 A. Sorry?
 6 Q. For someone who did not have a detailed technical
 7 background in IT matters, what was canvassed in this
 8 report was readily understandable to you, was it?
 9 A. Broadly, yes, it was.
 10 Q. If we can move on, please, to the "Executive Summary",
 11 which is on the second half of this page, it reads, in
 12 the first paragraph:
 13 "The allegations to which we are responding follow
 14 on from cases where thousands of pounds were missing at
 15 audit. We remain satisfied that this money was missing
 16 due to theft in the branch -- we do not believe the
 17 account balances against which the audits were conducted
 18 were corrupt."
 19 Just pausing there, were you told by Mr Ismay, or
 20 did you later become aware during your time as CFO,
 21 what, if any, enquiries were made by Product and Branch
 22 Accounting when an SPM or an employee said, "I simply do
 23 not know what has caused the accounting shortfall in the
 24 branch accounts. I think the system must be at fault"?
 25 So my question is: would you have known what processes

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1 were followed by Product and Branch Accounting to
 2 investigate the causes of these shortfalls?
 3 **A.** I think I would have had a broad understanding of the
 4 processes, in terms of investigating the differences,
 5 but I don't think I would have a detailed understanding
 6 of what happened in each particular case.
 7 **Q.** Do you think that's something you would have enquired
 8 about at the time, namely what are we doing as
 9 a business to satisfy ourselves that these losses are
 10 genuine, bearing in mind what we're being told by our
 11 agents and employees about suspected faults in the
 12 system?
 13 **A.** I don't recall, but my memory is that these were
 14 relatively rare occurrences. So I ...
 15 **Q.** We'll come on shortly to look at that issue. If we turn
 16 to the second paragraph, please, of the "Executive
 17 Summary", it states:
 18 "[Post Office Limited] has extensive controls
 19 spanning systems, processes, training and support.
 20 Horizon is robust, but like any system depends on the
 21 quality of entries by the users."
 22 If we just pause there again, would that have struck
 23 you at the time that you read this report as an accurate
 24 statement, namely that the robustness of Horizon
 25 depended on the quality of the entries made by its

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1 **A.** I don't recall but I don't believe I did. I think
 2 I read and accepted this report at first sight.
 3 **Q.** If we carry on, please, to the final paragraph on the
 4 first page, which reads:
 5 "The integrity of Horizon is founded on its tamper
 6 proof logs, its realtime backups and the absence of
 7 'backdoors' so that all data entry or acceptance is at
 8 branch level and is tagged against the log on ID of the
 9 user. This means that ownership of the accounting is
 10 truly at branch level."
 11 On the face of it, what Mr Ismay appears to be
 12 identifying here, a variety of security features which
 13 underpin his stated confidence in the integrity of
 14 Horizon; is that fair?
 15 **A.** Yes.
 16 **Q.** What did you understand Mr Ismay to mean by the "absence
 17 of 'backdoors'"?
 18 **A.** I would have understood this to mean that only the
 19 subpostmaster had access directly to their data, that
 20 there was no intervention at the centre by Product and
 21 Branch Accounting and that the data stood in accordance
 22 with what was input in the branch, and that there was no
 23 other access to that data, hence the tamper-proof logs.
 24 **Q.** We know, because we've discussed it, you were aware that
 25 Product and Branch Accounting issued transaction

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1 users?
 2 **A.** I believe it would have done, yes.
 3 **Q.** Would it have occurred to you that the quality of the
 4 code and the work undertaken to develop and maintain the
 5 system might have been significant factors which
 6 affected the robustness of the system?
 7 **A.** I don't believe I would have had that awareness.
 8 **Q.** Do you think it would have struck you at the time that
 9 statements like that betrayed an assumption by the Post
 10 Office that any fault, any accounting error,
 11 responsibility for any accounting error, must lie with
 12 the user?
 13 **A.** I don't think I would have seen it that way. But I can
 14 see now that it could be interpreted that way.
 15 **Q.** From your experience of working with large-scale IT
 16 systems, would you have considered that to be
 17 an accurate assumption, that any accounting error must
 18 be the fault of the user?
 19 **A.** No. I don't think I would have had that general view.
 20 **Q.** What would your experience have been?
 21 **A.** I think my experience would have been that faults could
 22 have arisen for any number of reasons, either user
 23 error, problems with software, problems with processing.
 24 **Q.** Do you recall whether you took any steps to challenge
 25 the assumption that we see there?

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1 corrections and Mr Ismay deals with these, please, at
 2 page 7 of the report. So this is under the heading of
 3 "Accounting and control in [Product and Branch
 4 Accounting]". Within the box at the top, the first
 5 paragraph reads:
 6 "Central controls over accounting are primarily in
 7 the Product and Branch Accounting team but also include
 8 activity in cash centres and alerts from our method of
 9 payment [processes]."
 10 If we go on, please, to the following page, at
 11 page 8, there's a number of bullet points there, the
 12 first one relating to transaction corrections. This is
 13 where we see here he gives his explanation about
 14 backdoors. It reads:
 15 "... 'double entry' adjustments sent to branches for
 16 their acceptance [this is his definition of transaction
 17 corrections]. There is no 'backdoor' to force them into
 18 branch accounts. Visibility is key to ensure ownership
 19 of the issue and prevent any risk of arguments about
 20 'backdoors'. "
 21 So that would be consistent, would it not, with your
 22 understanding that you've stated --
 23 **A.** Yes.
 24 **Q.** -- to me just now, essentially, that you've been told
 25 here that, if and insofar as Product and Branch

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1 Accounting issued a transaction correction, it still had
 2 to be accepted by the agent in branch --
 3 **A.** Correct.
 4 **Q.** -- and, therefore, they retained ultimate control over
 5 their accounting data?
 6 **A.** Correct.
 7 **Q.** Please could we return to the executive summary, which
 8 is on page 2, now. The second paragraph reads:
 9 "Accounting errors do happen through user mistakes,
 10 but these can be explained and resolved case by case."
 11 So, again, we see that assumption that all
 12 accounting discrepancies are caused by the user, do we
 13 not?
 14 **A.** We do.
 15 **Q.** "Systems issues have also arisen but again POL has been
 16 able to explain them and rectify them."
 17 So you're being given assurance there that, if and
 18 insofar as issues have arisen, they have been rectified
 19 by the business?
 20 **A.** Correct.
 21 **Q.** "Whilst they have affected the available and
 22 functionality of the system, with consequent impacts on
 23 customers and clients, they do not bring the integrity
 24 of the system into question."
 25 Now, this paragraph of the report alerted you to
 21

1 user but by the system itself. That's right, isn't it?
 2 **A.** Yes.
 3 **Q.** This paragraph also tells us that the issue dated back
 4 to 2005, so this is five years before this report was
 5 prepared?
 6 **A.** Correct.
 7 **Q.** If we read on, we can see Mr Ismay's description of the
 8 steps which were taken by Post Office Limited to explain
 9 and rectify the problem, as he suggests in his Executive
 10 Summary. The second paragraph reads:
 11 "Up to now it had been understood that [this issue]
 12 related to a version of scanners where [Post Office
 13 Limited] did not know which other branches had the same
 14 version. It was not therefore possible to isolate other
 15 branches. It was also a rare event on the scanners
 16 themselves. It was not a systematic failure with every
 17 transaction on the particular scanner."
 18 If we pause there again, we can see from this
 19 paragraph, can we not, that Post Office Limited had
 20 originally understood this problem to relate to a piece
 21 of hardware, namely the barcode scanner that was used
 22 and that supported the Horizon system.
 23 **A.** Yes.
 24 **Q.** It's also clear that this misunderstanding, as to the
 25 source of the problem, had prevailed until shortly
 23

1 system issues, did it not --
 2 **A.** Yes.
 3 **Q.** -- that were known to Post Office Limited at the time?
 4 Could we please move forward to the section of the
 5 report where these system issues are addressed in more
 6 detail. That's at page 15. This section is entitled
 7 "Known IT issues" and Their Non-Applicability to the
 8 Allegations Made". I'd like to ask you, please, some
 9 questions about the example given at (b), which is
 10 described as "Barcode sticking". The first paragraph
 11 reads:
 12 "A small number of branches have experienced
 13 a situation where a customer transaction ([for example]
 14 a bill payment) sticks on the details of the preceding
 15 transaction. In some cases the branch has spotted it
 16 immediately but in some cases it has only come to light
 17 when the customer complains that they are being chased
 18 for an 'unpaid' bill. Incidents go back to 2005."
 19 So, on the face of it, if we pause there, what's
 20 being described here is an accounting error, namely that
 21 a transaction has not been properly processed and
 22 recorded by Horizon; would you agree with that?
 23 **A.** Yes.
 24 **Q.** What's more, contrary to the assertion that's made in
 25 the executive summary, it was not an error caused by the
 22

1 before this report was written in August 2010. Is that
 2 not clear from the statement "Up to now it has been
 3 understood"?
 4 **A.** Yes, you could interpret it that way.
 5 **Q.** Namely between 2005, and we're now nearly August 2010,
 6 when this report is produced, it has been assumed by
 7 Post Office Limited that this problem related to a piece
 8 of hardware?
 9 I think you agree that that's --
 10 **A.** Yes, you can interpret it that way, yes.
 11 **Q.** -- an acceptable interpretation of that?
 12 In terms of the remedial steps that Post Office said
 13 they've taken to deal with this issue, you were told
 14 here that Post Office didn't know which branches were
 15 affected by what was thought to be this faulty version
 16 of the barcode scanner and, as a result, they'd not been
 17 able to identify the branches affected by the problem;
 18 do you agree with that?
 19 **A.** Yes.
 20 **Q.** So is it not right that you're essentially being told
 21 here that, for a period of nearly five years, Post
 22 Office had done nothing to address the underlying
 23 problem which was causing this known issue?
 24 **A.** I don't know if I'm being told that. I think I'm
 25 being -- I think he's seeking to differentiate between
 24

1 any errors, which would have been caused by inputting of
2 data in a branch, with broader hardware issues, which
3 he's asserting did not have any direct bearing on any of
4 the previous legal cases, and that there would be, from
5 time to time, glitches that would happen with the system
6 that would be rectified. I accept that it looks as if
7 this particular one took a long time to be rectified.

8 **Q.** So if we look, then, at the following paragraph, it
9 confirms that Fujitsu had investigated the issue, that
10 is to say the suspected problem with the hardware, the
11 barcode scanner, and had advised Post Office it's not
12 a hardware related issue; it's a Riposte software issue.
13 Were you aware of the function that Riposte served in
14 the Horizon system?

15 **A.** No.

16 **Q.** It goes on to state:

17 "It will cease to be a problem with Horizon Online,
18 as HOL [meaning Horizon Online] does that use Riposte."

19 So again we see here, quite some time after the
20 issue first arose, Fujitsu have ultimately diagnosed it
21 as a software fault, not a hardware issue, but they're
22 not intending to do anything about it because the
23 original Legacy version of Horizon is going to be
24 shortly superseded; is that how you would have read?

25 **A.** That appears to be the case, yes.

25

1 unresolved in the Horizon system, would you have not
2 entertained the possibility that there would be affected
3 branches where accounting errors hadn't been detected
4 and adequately resolved; where, for example,
5 a subpostmaster had made it good because they couldn't
6 work out the underlying cause of the problem --

7 **A.** I think that's a possibility.

8 **Q.** -- or had been made to repay?

9 **A.** But, again, I think Mr Ismay is seeking to draw
10 a differentiation between errors or imbalances generated
11 at the point of sale from issues relating to hardware or
12 software that was no longer used, but I can see from
13 this that there may have -- this may have been
14 a relatively widespread issue.

15 **Q.** It appeared to show, did it not, that there was
16 a software bug in the system which was capable of
17 causing accounting errors because, if a customer
18 complained that their bill hadn't been paid, then, at
19 some stage in the process, an error had arisen, had it
20 not?

21 **A.** Yes, it would depend how -- you know, the order of
22 magnitude, how many customers and branches were
23 affected.

24 **Q.** Did you consider that this information was consistent
25 with the confidence being expressed by Mr Ismay in the

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1 **Q.** Now, what Mr Ismay goes on to tell you is that:

2 "This issue does not appear to have arisen in any of
3 the legal cases in question and the incidents have been
4 resolved at all branches where it has been noted."

5 Now, pausing there, what you were being told is
6 that, where accounting errors had arisen and had been
7 discovered, they had been resolved --

8 **A.** Yes.

9 **Q.** -- that's correct, isn't it? But you'd also been told
10 in the preceding paragraphs that Post Office Limited had
11 not taken steps to identify the branches affected by
12 this problem in the period between 2005 and 2010, had
13 they? They'd not taken active steps to try to identify
14 which branches were affected because they didn't know
15 which branches had this faulty barcode scanner?

16 **A.** That would appear to be the case, yes.

17 **Q.** The Post Office had instead relied upon the branch to
18 spot the problem or a customer to raise a complaint, for
19 example, about an unpaid bill?

20 **A.** Yes.

21 **Q.** So a reactive rather than a proactive --

22 **A.** It looks that way.

23 **Q.** -- response?

24 Bearing in mind that this fault appears to have
25 persisted for a period of five years, undiagnosed and

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1 integrity of the Horizon system?

2 **A.** I viewed this series of bugs or glitches that had
3 happened historically as beings things which typically
4 happen in a large IT computer system, that they had been
5 addressed -- I can see this one took a long time to be
6 addressed -- but what I was clearly being asked to
7 accept was that none of these issues had any direct
8 relation to previous legal cases.

9 **Q.** That appears to be the assumption that was made by
10 Mr Ismay, and that's what he says in the report, but
11 what I'm testing with you is whether that's really
12 consistent with what you were being told here because
13 you were being told that Post Office were taking no
14 steps to detect this issue, to proactively resolve it,
15 and Fujitsu weren't even aware that the software fault
16 existed. So how could you or Mr Ismay possibly be
17 confident that these were isolated cases and they'd all
18 been resolved?

19 **A.** Well, I think my personal assurance would have been,
20 again, going back to my duties as CFO, was to verify the
21 accuracy of the company's financial statements and,
22 rightly or wrongly, I would have taken assurance from
23 the fact that Horizon Online had been introduced in 2010
24 and that this particular issue no longer existed.

25 **Q.** It didn't say very much, though, did it, for Post

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1 Office's processes and procedures before you came into
2 post?

3 **A.** Well, it suggested that there had been issues in the
4 past, which had generally been resolved, and/or Horizon
5 Online had superseded the previous system.

6 **Q.** The final thing that Mr Ismay says about this particular
7 issue is that, we can see there in the final paragraph
8 and the last sentence:

9 "This is not considered a systematic integrity issue
10 for Horizon and it should be resolvable from the facts
11 of records in the Horizon transaction logs."

12 Would you have agreed with Mr Ismay's assessment
13 that this was not a systematic integrity issue?

14 **A.** I think I would have accepted it at face value at the
15 time and I think the reference to the transaction logs
16 presumably means that all of the discrepancies would
17 have been found and could have been found in due course.

18 **Q.** If the transaction logs still existed?

19 **A.** Indeed.

20 **Q.** I'm going to move on now from known IT issues to another
21 part of the report, in which Mr Ismay addressed the
22 option of procuring an independent review or audit of
23 Horizon to respond to the challenges to its integrity.
24 Do you recall that aspect of the --

25 **A.** Yes.

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1 review because it would not have the effect of silencing
2 criticisms of Horizon; is that fair?

3 **A.** Yes.

4 **Q.** At the time you read the report, would you have
5 considered that a good reason for not procuring
6 an independent review of Horizon?

7 **A.** I don't think I would, actually. I mean, I clearly
8 wouldn't now and I don't recall in detail reading this
9 paragraph, but I would like to think that I wouldn't
10 think that this was a suitable reason or series of
11 reasons for not commissioning an independent review.

12 **Q.** Sorry, I'd just like to clarify that last point you're
13 saying. You think you wouldn't have thought --

14 **A.** Yes, I -- clearly, I have a clear view now but, trying
15 to place myself back in 2011 and reading this, although
16 I don't have a precise recollection of reading it,
17 I would like to think that I would not accept these
18 reasons as a legitimate reason for not commissioning
19 an independent review.

20 **Q.** The report goes on to say:

21 "Ernst & Young and Deloitte's are both aware of the
22 issue [by which he presumably means the issue about
23 integrity] from the media and we have discussed the pros
24 and cons of reports with them. Both would propose
25 significant caveats and would have limits on their

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1 **Q.** Can we please turn to page 19. Thank you. In the
2 second half of the page 19 we see the heading "4(c)
3 Independent Review and Audit Angles". The report
4 states:

5 "POL has actively considered the merits of
6 an independent review. This has been purely from the
7 perspective that we believe in Horizon that a review
8 could help give others the same confidence that we
9 have."

10 So we see, again, Mr Ismay making a very clear
11 statement of confidence in the integrity of the system;
12 is that fair?

13 **A.** Yes.

14 **Q.** He goes on to say:

15 "Our decision between IT, Legal, [Product and Branch
16 Accounting], Security and Press Office has continued to
17 be that no matter what opinions we obtain, people will
18 still ask 'what if' and the defence will always ask
19 questions that require answers beyond the report.
20 Further such a report would only have merit as at the
21 date of creation and would have to be updated at the
22 point at which Horizon or the numerous component
23 platforms were upgraded."

24 What this appears to be saying, does it not, is that
25 it simply wouldn't be worth commissioning an independent

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1 ability to stand in court, therefore we have not pursued
2 this further."

3 What Mr Ismay appears to be saying here is that
4 Ernst & Young, POL's external auditors, and Deloitte's,
5 were simply not prepared to sign off on the integrity of
6 Horizon; is that fair, so far as he understood it?

7 **A.** No, I don't think I would interpret it that way.

8 **Q.** How would you have interpreted it?

9 **A.** I interpret this as saying that both the auditors and
10 Deloitte would be likely to introduce so many caveats
11 that a report might not have much value and might not be
12 able to address all of the questions asked.

13 **Q.** Isn't that in the nature of a caveat: that what you're
14 saying is "I can't sign this off as having integrity
15 because I simply am not in a position to say one way or
16 the other that it does"? Is that not what the reference
17 to "caveats" is?

18 **A.** Broadly, yes. It would depend what those caveats were,
19 of course.

20 **Q.** Did you consider at the time that there was a tension
21 between the absolute confidence which POL was expressing
22 in the integrity of Horizon and the reluctance of its
23 statutory auditors to sign up to that position?

24 **A.** No, because I had a separate relationship with Ernst &
25 Young and, as I'm sure we'll come on to discuss, we were

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1 working through a series of improvements to the IT
 2 control environment. So, set against that knowledge of
 3 what I was actually working on, I don't think this
 4 paragraph would have particularly surprised me.

5 **Q.** As you've just alluded to now, the report goes on to
 6 explain that the external audit that Ernst & Young
 7 perform includes tests of Post Office Limited's IT and
 8 finance control environment but the scope and
 9 materiality of those tests mean that Ernst & Young would
 10 not give a specific opinion on the systems from this.
 11 We shall come on to that topic shortly, this issue of
 12 the Post Office's IT and finance controls, but you were
 13 aware from your work with Ernst & Young that those tests
 14 were carried out -- were you not --

15 **A.** Yes.

16 **Q.** -- and that Ernst & Young would not express an opinion
 17 on the overall integrity of the system due to the
 18 relatively high-level nature of the work that they were
 19 doing on those controls and processes; is that fair?

20 **A.** Yes, it is.

21 **Q.** Before we move on from this report, please, there's one
 22 final paragraph I'd like to address. Could we turn to
 23 page 20. So this is following on from the part of
 24 Mr Ismay's exploration of obtaining an independent
 25 review and audit. He states:

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1 functions and the accuracy of the Post Office's
 2 financial statements?

3 **A.** Do I think then that I would have been? I think
 4 I accepted the broad thrust of this report at the time.
 5 I don't think any of the legal or prosecution issues
 6 would have influenced me but I think I wrongly took
 7 assurance on the integrity of the data for my purposes.

8 **Q.** You've said several times in relation to this report
 9 "I accepted, I accepted, I accepted what I was being
 10 told". Now, you'd obviously only been in post for
 11 a matter of weeks, you couldn't be expected to
 12 understand or have an awareness of the detail of this
 13 report but it was your role to challenge, was it not,
 14 where challenge was necessary?

15 **A.** Yes, and I would set this report into a broad context of
 16 a wide induction programme for -- taking several months
 17 across the whole of the Post Office Network. This is
 18 clearly an important part for me to understand what's
 19 happening in Chesterfield. Mr Ismay is telling me
 20 there's a back history here that you need to be aware
 21 of, that there have been challenges to the integrity of
 22 the system, but I would set that against the context of
 23 I'm having parallel conversations with the audit partner
 24 from Ernst & Young and getting an independent view from
 25 him on the quality of data, the integrity of the system,

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1 "It is also important to be crystal clear about any
 2 review if one were commissioned -- any investigation
 3 would need to be disclosed in court. Although we would
 4 be doing the review to comfort others, any perception
 5 that POL doubts its own systems would mean that all
 6 criminal prosecutions would have to be stayed. It would
 7 also beg a question for the Court of Appeal over past
 8 prosecutions and imprisonments."

9 Did it strike you as odd that one of the reasons
 10 being advanced by Mr Ismay for not commissioning
 11 an independent review would be that it would need to be
 12 disclosed in court?

13 **A.** I don't recall, it certainly strikes me as odd, having
 14 reread the report recently but I don't recall having
 15 thought at the time that this was odd. Again, my
 16 primary focus would have been to understand issues that
 17 might relate to the integrity of Post Office's financial
 18 data and, regrettably, I don't think I would have been
 19 focusing so much on what might need to be disclosed in
 20 court as a result of having an independent review
 21 commissioned. I don't think that would have been
 22 uppermost in my thoughts at the time.

23 **Q.** Do you think you would have been in favour of
 24 commissioning such a review when you read this report,
 25 bearing in mind the importance of integrity to your

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1 areas of control weakness that still need to be
 2 addressed. So this is an important piece of context but
 3 this was not my only reference point, at that stage.

4 **Q.** No, by no means, but it was something of a red flag, was
 5 it not --

6 **A.** Yes.

7 **Q.** -- issues with the integrity of the system?

8 **A.** And I'm sure I would have discussed it with the audit
 9 partner, bear in mind that at least 50 per cent,
 10 60 per cent of the audit each year was carried out in
 11 Chesterfield.

12 **Q.** Thank you. If we can turn, then, to our next topic
 13 which is the annual independent financial audit
 14 conducted by Ernst & Young. What I would like to
 15 explore with you now, if I may, is your knowledge of
 16 those reviews that Ernst & Young conducted on POL's IT
 17 governance and control environment.

18 You've explained in your statement you weren't in
 19 post at the time when Ernst & Young conducted and
 20 finalised their audit for the financial year 2010/2011.

21 **A.** Correct.

22 **Q.** That's correct. But the findings of that audit were
 23 communicated to you and you discussed them with the
 24 audit partner, Angus Grant; is that right?

25 **A.** Yes, I did.

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- 1 Q. You state that your conversation with Mr Grant was
2 positive, so far as you recall?
- 3 A. It was. I recall it was a positive conversation. He
4 described a gradual improvement in the overall quality
5 of internal controls. He referenced the fact that there
6 was more work to be done and I think, as we'll see in
7 the executive summary for the management letter from
8 2010/11, he referenced some specific areas that he
9 described as refinements, rather than fundamental
10 control deficiencies. So, from my point of view,
11 I wanted to know how bad things were and, frankly, what
12 the chances were of serious management letter points
13 and/or a qualified audit, and he assured me that neither
14 of those was the case.
- 15 Q. As you've just explained, you took assurance from the
16 fact that the audit had not identified issues that would
17 lead to a qualification of the report. That really is
18 the nuclear option, is it not, to qualify the financial
19 statements of a business?
- 20 A. It is.
- 21 Q. Therefore, there might be some very serious issues which
22 need to be addressed but which don't necessarily lead to
23 a qualification?
- 24 A. That's true.
- 25 Q. Could we please bring up the management letter which was

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- 1 be relied upon as signing off a system as having
2 integrity because its primary function is to look at
3 those areas which might have an impact upon the
4 financial statements but not more holistically at the
5 system; is that fair?
- 6 A. That's true. But I would say it's difficult to
7 imagine -- when you look at all the transactions that
8 are covered within the financial statements, it's
9 difficult to understand exactly how extensive weaknesses
10 could be that would not have any impact at all on the
11 financial statements of the organisation. But I accept
12 that he's not giving a blanket green light to the
13 Horizon system nor would I have expected him to.
- 14 Q. I think the point is: is it not so much that weaknesses
15 in the system wouldn't have an impact on integrity; is
16 it not rather that Ernst & Young are not looking at all
17 aspects of the system, they're not looking at the code,
18 they're not looking at, you know, the specifics of the
19 underlying architecture and structure of the system and,
20 therefore, they're not signing it off overall as robust?
- 21 A. That's correct.
- 22 Q. Notwithstanding that caveat, Ernst & Young had detected
23 deficiencies in POL's IT environment, had they not?
- 24 A. They had.
- 25 Q. If we could turn to the "Executive summary", please, on

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1 produced by Mr Grant in August 2011. It bears the
2 reference POL00030217. Thank you.

3 On page 2 of this document, please, we have the
4 introductory letter from Mr Grant to Sarah Hall. Do you
5 recall what Ms Hall's role was?

6 A. She was financial controller.

7 Q. Thank you. It bears the heading, "Internal control
8 matters arising from the 2011 audit", and it goes on to
9 state in the second paragraph:

10 "Our review of the company's systems of internal
11 control is carried out to help us express an opinion on
12 the accounts of the company as a whole. This work is
13 not primarily directed towards the discovery of
14 weaknesses, the detection of fraud or other
15 irregularities (other than those which would influence
16 us in forming that opinion) and should not, therefore,
17 be relied upon to show that no other weaknesses exist or
18 areas require attention. Accordingly, the comments in
19 this letter refer only to those matters which have come
20 to our attention during the course of our normal audit
21 work and do not attempt to indicate all possible
22 improvements that a special review might develop."

23 So this really here is one of those significant
24 caveats that we saw discussed in Mr Ismay's report,
25 which is to say that an audit of this type should never

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1 page 3. So, in the first paragraph, we see a point
2 you've already alluded to, which is that improvements
3 have been made by Post Office Limited, so it reads:

4 "The finance leadership team at Post Office Limited
5 has implemented and processed improvements throughout
6 the organisation during the past financial year.

7 "In particular, focussed management action has
8 addressed many of the issues raised in our prior year
9 management letter and led to significant improvements in
10 the overall payroll control environment. The
11 recommendations we have made in this report should be
12 seen as refinements rather than fundamental control
13 deficiencies in comparison."

14 So that's really summarising the point you made
15 earlier as to what you took from this report,
16 improvements had been made, these were refinements now
17 being identified, not fundamental control deficiencies?
18 Is that --

19 A. Correct.

20 Q. Okay. It goes on to state, however:

21 "The main area we would encourage management focus
22 on in the current year is improving IT governance and
23 control environment.

24 "Within the IT environment our audit work has again
25 identified weaknesses mainly relating to the control

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1 environment operated by POL's third party IT suppliers",
 2 who were --
 3 **A.** Fujitsu.
 4 **Q.** -- so far as you are aware, Fujitsu:
 5 "Our key recommendations can be summarised into the
 6 following four areas [fourth of which is to]:
 7 "Strengthen the review of privileged access."
 8 What did you understand this letter to mean by
 9 "privileged access"?
 10 **A.** I think I understood it to be a theoretical possibility
 11 that people could access elements of the system. Having
 12 been told that there were no backdoors to the system,
 13 I would not have believed that this entailed access to
 14 the -- what I would call the front office, the branch
 15 accounts, of Horizon. But I can see that it was
 16 a significant finding and a control weakness that would
 17 need to be addressed in short order.
 18 **Q.** When you say that you understood it to be only
 19 a theoretical possibility, is it your evidence that, in
 20 reaching that assumption, you were relying upon what
 21 Mr Ismay had told you about the absence of backdoors?
 22 **A.** I can't -- certainly, Mr Ismay's report would have been
 23 in my mind. I can't recall whether there would have
 24 been other references as well. I don't -- that may not
 25 have been the only reference point that I had for

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1 **A.** I don't recall.
 2 **Q.** It might assist if we were to look at the section of the
 3 report which addresses this issue, please. Could we
 4 turn to page 31. Thank you. So we see the left-hand
 5 column bears the heading "Background", the middle column
 6 "Recommendation" and the final column "Management
 7 Comment". In the bottom row, the report reads:
 8 "We reviewed privileged access to IT functions
 9 including access to user administration functionality
 10 across all in-scope applications and their supporting
 11 infrastructure."
 12 It goes on to say, if we can turn over the page,
 13 please, "Our examination revealed". It deals first with
 14 POLSAP, which was the Post Office's back end accounting
 15 system -- is that correct -- and then goes on to deal
 16 with Horizon Next Generation on the following page,
 17 please. It states there:
 18 "There are inappropriate system privileges assigned
 19 to the APPSUP role and the SYSTEM_MANAGER role on the
 20 Oracle database level on the Branch Database Server
 21 supporting HNG-X;
 22 "There is [also] inappropriate privileged access at
 23 the Oracle database level on the Transaction Processing
 24 System server (DAT) supporting HNG-X."
 25 Would you have understood at the time what was being

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1 forming that opinion.
 2 **Q.** Bearing in mind this is identified as one of the four
 3 main areas which require management attention, would you
 4 not have discussed this with Mr Grant at the time, to
 5 test your assumption that it was a purely theoretical
 6 possibility?
 7 **A.** I don't recall whether I discussed these four issues
 8 specifically with him at the time. It's likely that
 9 I would have done but I don't recall the conversation.
 10 **Q.** So are you saying that you think your conversation
 11 simply focused on the positive areas of improvement?
 12 **A.** Well, I think that was the wider context -- was that
 13 things had improved greatly but "There are some areas
 14 that you need to continue to improve, together with your
 15 IT colleagues and your third-party supplier", hence the
 16 first reference to improving governance of the outsource
 17 application management. There's clearly a criticism
 18 there of the way that Post Office was managing the
 19 Fujitsu relationship and the degree to which we were
 20 taking direct control of the control environment.
 21 **Q.** It's likely, is it not, that Mr Grant would have
 22 discussed each of those four points with you in some
 23 detail, no?
 24 **A.** Quite possibly.
 25 **Q.** You simply don't recall?

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1 referred to here, do you think?
 2 **A.** I don't think I would have had a detailed understanding
 3 of it and, clearly, it's taken on far greater
 4 significance since that time. I think I would have
 5 viewed this as one of a series of areas of weakness.
 6 I would have viewed it as theoretical but something
 7 which needed to be addressed and which, in due course,
 8 we did take steps to address, both internally and with
 9 Fujitsu, over the course of the next 12 months and,
 10 indeed, in the financial year -- my first financial year
 11 2011/12, significant steps were taken to address each of
 12 these and Ernst & Young carried out compensating testing
 13 to be able to give themselves the assurance they needed,
 14 admittedly for the purpose of verifying the financial
 15 statements and the -- being able to give us a clear
 16 audit.
 17 So yes, looked at in isolation with what we now
 18 know, this looks like a very clear message. What we
 19 actually did was to gradually close, over the course to
 20 of the next 12 to 18 months, all of these loopholes and,
 21 in fact, for the financial year which commenced one
 22 April 2012, we had ISAE 3402, which is the international
 23 standard for accreditation for testing of IT controls,
 24 in place at the cost of Fujitsu, so we had effectively
 25 closed all of these doors within eight months of me

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1 joining the organisation.

2 **Q.** We'll come on shortly, Mr Day, to the subsequent audit
3 work and assurance work that you were involved in but,
4 if we could turn, please, to the following page, we can
5 see what Ernst & Young said about the consequences of
6 inappropriate privileges or accesses to the system. So
7 in the left-hand column, under "Background", we see the
8 last paragraph in the first row reads:
9 "Unrestricted access to privileged IT functions
10 increases the risk of unauthorised/inappropriate access
11 which may lead to the processing of unauthorised or
12 erroneous transactions."
13 On the face of it, these statements indicated, did
14 they not, that Fujitsu staff had the ability to access
15 parts of the Horizon system in a manner which was
16 unauthorised or inappropriate; is that fair?
17 **A.** That's my understanding now, I don't think that was my
18 understanding at the time.
19 **Q.** It's right, is it not, that that statement was in direct
20 contradiction to what you'd been told by Mr Ismay about
21 the absence of backdoors into the Horizon system, is it
22 not? If it could lead to the processing of unauthorised
23 or erroneous transactions, it couldn't possibly be right
24 that subpostmasters had complete ownership of their
25 accounting, could it?

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1 hindsight, and understand exactly what that could
2 potentially mean in terms of individual branch accounts
3 but, again, it doesn't speak to the suggestion that that
4 could be done without a subpostmaster's visibility of
5 such a transaction.

6 **MS HODGE:** Sir, I think that might be a suitable time to
7 take a short break, please, if that's convenient.

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

9 Let me just ask you, Mr Day, isn't Ms Hodge right
10 when she asks you to remove the word "theoretically"
11 from your answer, in this sense: that unauthorised
12 access, in the way that Ernst & Young are describing,
13 could take place -- that wasn't theory -- however, there
14 was no evidence that it had taken place?

15 **A.** Yes, I would agree with that, sir.

16 **SIR WYN WILLIAMS:** Right. Thank you.

17 **MS HODGE:** Thank you, sir. Can we please return at 11.15.

18 **SIR WYN WILLIAMS:** Yes, of course.

19 **MS HODGE:** Thank you.

20 (11.03 am)

(A short break)

22 (11.15 am)

23 **MS HODGE:** Good morning, sir, can you see and hear us?

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

25 **MS HODGE:** Thank you.

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1 **A.** No, again, I wouldn't have -- I'm sure I would not have
2 interpreted this at the time as being a reference to --
3 even a theoretical reference -- to Fujitsu employees
4 being able to access individual branch accounts. This
5 is talking about the Horizon estate as a whole and
6 a perceived weakness relating to the inappropriate use
7 of privileged access authority. It's a serious matter
8 but I don't think I -- in fact, I'm sure I didn't relate
9 this back to individual subpostmaster accounts.

10 **Q.** What do you think you understood it to mean, when it
11 referred to the processing of unauthorised or erroneous
12 transactions?

13 **A.** Well, just that: that there was a theoretical
14 possibility that --

15 **Q.** Why was it only theoretical though? This is saying that
16 they have, as a matter of fact, unrestricted access,
17 that they have inappropriate privileged access. So they
18 did have this access. It wasn't purely theoretical, was
19 it?

20 **A.** Well, it doesn't say how many or how many incidences
21 there had been, whether indeed they'd ever been used but
22 it's showing that there is a control weakness that could
23 give rise, in theory, to unauthorised transactions
24 broadly within the Horizon Online estate. You can read
25 it completely differently now in the knowledge of

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1 Mr Day, before the break we were looking at the
2 Ernst & Young independent annual audit for the financial
3 year 2010 to 2011 -- forgive me, the management letter
4 from that audit.

5 **A.** Yeah.

6 **Q.** I'd like to turn, please, to the recommendations which
7 Ernst & Young made to address the weaknesses identified
8 in the IT control environment. This is at POL00030217,
9 if we could start, please, at page 31. Thank you. So
10 we looked, firstly, at the column bearing the title
11 "Background". We can see the recommendations contained
12 in the middle column, and it states in the final row:

13 "We recommend that management conducts a review of
14 privileged access to IT functions across all in-scope
15 applications and their supporting infrastructure to
16 determine whether the level of privileged access granted
17 is appropriate."

18 It then reads:

19 "Where access is deemed to be inappropriate, this
20 access should be revoked immediately."

21 It goes on to say, please, at page 34, in the top
22 row:

23 "Management should implement monitoring controls to
24 help ensure that controls operated by the third party
25 service provider [we know to be Fujitsu] are in place

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1 and are in operation, for example, monitoring of
 2 appropriateness of access to privileged users/profiles."
 3 Now, so far as you were aware, who within the
 4 business would have been responsible for taking these
 5 recommendations forward?
 6 **A.** The IT function, the CIO.
 7 **Q.** Would that be in conjunction with finance or in
 8 isolation?
 9 **A.** I would have viewed my responsibility as owning the
 10 audit overall. Therefore, I would have had
 11 an expectation that IT colleagues working in conjunction
 12 with Fujitsu would have addressed any IT control issues
 13 arising from the prior year management letter, just as
 14 I would have expected my own financial accounting
 15 reporting team to have been responsible for any
 16 specifically financial issues which had arisen. But
 17 here we're talking about IT control issues.
 18 **Q.** The CIO at the time was Lesley Sewell; is that correct?
 19 **A.** Correct.
 20 **Q.** Do you recall receiving a briefing in May 2012 from
 21 Ms Sewell, in which she addressed these recommendations?
 22 **A.** I've seen that document recently. I don't recall at the
 23 time receiving it.
 24 **Q.** Please could we bring it up. It's POL00143065. Thank
 25 you.

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1 the Royal Mail Group Audit Risk and Compliance
 2 Committee, that I should seek this accreditation from
 3 Fujitsu.
 4 And, as we'll come on to see, we -- in fact, the CIO
 5 achieved that for the start of the 2012/13 financial
 6 year.
 7 **Q.** In terms of what this report achieved, was it materially
 8 different to the tests which Ernst & Young had carried
 9 out of the IT control environment for the period 2010 to
 10 2011?
 11 **A.** My understanding is that -- well, firstly, it was
 12 internationally accredited, it was an industry standard
 13 but that, in the intervening year, 2011/12, Ernst &
 14 Young had carried out extensive compensating testing, as
 15 they called it. I don't think I knew exactly what that
 16 involved but it was sufficient for them to be able to
 17 give the same degree of assurance that they would be
 18 able to give in subsequent years as a direct reliance on
 19 the ISAE 3402.
 20 The point that they made to me, strenuously, was
 21 that there was both an efficiency argument here, which
 22 is it didn't make sense for them to be -- for us, Post
 23 Office, to be paying them to do compensating controls
 24 for a third party system and, secondly, that there was
 25 a point of principle which was that, surely, Fujitsu,

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1 We can see at the top it's a briefing for the Chief
 2 Executive and for you, as Chief Financial Officer, in
 3 relation to Post Office IT general controls, and this is
 4 in respect of the audit for the financial period
 5 2011/2012. But, as we'll see, it comments on some of
 6 the progress which had been made in relation to the
 7 observations in the previous year's audit.
 8 **A.** Yes.
 9 **Q.** Under the heading "Purpose", it states that the paper is
 10 to provide an update on, firstly:
 11 "Progress made in addressing the observations from
 12 the [2011/2012] IT General Controls Audit.
 13 "[Secondly, the] Implementation of an SAS70
 14 (ISAE3402) style report.
 15 "[Thirdly] Observations arising from the 2011/12
 16 audit and the proposed Management Response."
 17 Just pausing there, you mentioned before the break
 18 the implementation of an ISAE 3402 type audit. Can you
 19 explain, please, what that was?
 20 **A.** Yeah, this was an internationally recognised standard
 21 for assurance engagements relating specifically to the
 22 testing of IT control environments. So it was
 23 considered a best-in-class certification of the quality
 24 of IT controls and from, more or less, the day I started
 25 there had been strong encouragement, particularly from

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1 who would have other clients, presumably with similar
 2 requirements, should take responsibility, certainly
 3 financially, for achieving that accreditation.
 4 **Q.** Just to be clear, the ISAE 3402 style of report would
 5 not have been an independent forensic audit of Horizon,
 6 that type of audit that had been mooted in Mr Ismay's
 7 report back in 2010?
 8 **A.** No, it wouldn't, no. This would have been a more
 9 efficient and, as I say, more widely recognised way of
 10 achieving the aims of having the financial statements be
 11 true and fair and accurate. It would not be
 12 a widespread assurance on the integrity of the Horizon
 13 IT System.
 14 **Q.** Its primary purpose then being to streamline --
 15 **A.** Yes.
 16 **Q.** -- those processes?
 17 **A.** Yes. Sorry, could I just add one thing?
 18 **Q.** Please.
 19 **A.** As far as I'm aware though, it did address specifically
 20 all of the four issues that had been raised in the
 21 '10/'11 management letter issue.
 22 **Q.** Including privileged access?
 23 **A.** It included testing of privileged access authority.
 24 **Q.** Under the heading "Background", please, if we go down,
 25 please, to paragraph 2.3, this briefing would have

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1 reminded you that the 2010/2011 audit had resulted in
2 a number of actions for Post Office and Fujitsu to
3 address, which it says were concluded by October 2011.
4 Is that consistent with your recollection?

5 **A.** Yes.

6 **Q.** It states:

7 "The implementation of these actions had resulted in
8 significant changes to our processes and to deliver
9 improvements to our IT General Controls."

10 It goes on to say:

11 "Given the timing of this year's audit (January and
12 February 2012), there was some time for these changes to
13 have embedded. The improvements are evidenced in the
14 findings of the 2011/12 audit where there are no high
15 risk observations within the 7 identified (versus 10
16 last year) and only 25 specific recommendations (versus
17 over 70 last year)."

18 Now, appended to the briefing, is a summary of the
19 seven observations which were made as part of the
20 2011/2012 audit. They're contained in Appendix B on
21 page 5 of this document, please. So we see here it
22 bears the title, "Summary of 2011/12 Ernst & Young audit
23 recommendations and proposed Management Responses". So
24 these are fresh recommendations arising from the latest
25 audit of Post Office's financial statements; is that

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1 briefing note that described all of the actions having
2 been undertaken by October 2011. So --

3 **Q.** So there was an inconsistency --

4 **A.** There was an inconsistency --

5 **Q.** -- on the face of it?

6 **A.** Yes, and this was a disappointment that Ernst & Young
7 felt the need to say that, notwithstanding some
8 management actions have been taken, they felt that this
9 point still stood.

10 **Q.** So that related both to the conducting a review of
11 privileged access and the other recommendation we looked
12 at before, which was the final one: implementing
13 monitoring controls for third-party suppliers, that
14 being Fujitsu. So this was an outstanding
15 recommendation?

16 **A.** It was, and this -- it was unfortunate that this, what
17 I'd call a sort of transition year, '11/'12 -- between
18 the findings of the '10/'11 report that I inherited and
19 the initiation of the ISAE standard on 1 April 2012,
20 I think we all believed that we had addressed, as well
21 as we could, with manual intervention and working with
22 Fujitsu, all of the issues from the '10/'11 management
23 letter. But this one clearly took longer or -- and/or
24 we didn't address it to the satisfaction of Ernst &
25 Young.

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1 correct?

2 **A.** It is.

3 **Q.** The first of these relates to privileged access. So
4 Ernst & Young appears to repeat the recommendation to
5 Post Office to conduct a review of privileged access for
6 in-scope applications, that being Horizon and POLSAP,
7 the Post Office back end accounting system, so that's
8 the first recommendation, the second being to revisit
9 the need to grant access to SAP_ALL and SAP_NEW levels.
10 Would you have understood at the time do you think, to
11 what that was referring?

12 **A.** Yes. Sorry, to the ...

13 **Q.** To SAP_ALL and SAP_NEW --

14 **A.** Yes, POLSAP, yes, was data extraction from Horizon
15 for -- used for further analysis of the financial
16 numbers.

17 **Q.** Forgive me but, insofar as there was a need to revisit
18 the granting of access at those levels, would you have
19 had a detailed understanding of what that was referring
20 to?

21 **A.** Yes, I would.

22 **Q.** What did you understand SAP_ALL and SAP_NEW to entail?

23 **A.** I'm sorry, I can't recall that now. But I generally
24 would have recalled being disappointed that this finding
25 came back the following year, having read the earlier

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1 **Q.** Now, in the column on the right-hand side, Ms Sewell,
2 the CIO provides a summary of the proposed Post Office
3 Management response and that first bullet point provides
4 a definition of privileged access. She says there:

5 "Privileged access describes the level of control
6 where the user having this access can perform all or
7 nearly all tasks within the system, eg SAP_ALL provides
8 the capability to process and approve financial
9 transactions within a SAP system. The purpose of
10 SAP_ALL is to enable qualified administration users the
11 capability to maintain the system."

12 Now, before the break, you said in your evidence
13 that you understood privileged access to be a purely
14 theoretical possibility. Did this not show that it
15 wasn't simply theoretical; it was something which was,
16 in fact, used by administration users to maintain the
17 system?

18 I appreciate this is a reference to SAP, which is
19 the back end system but, insofar as we're looking at
20 privileged access more broadly, this established, did it
21 not, that it was something that wasn't simply "could be
22 used" but was, in fact, used?

23 **A.** It does. I don't think it would have surprised me or
24 alarmed me that there was access to the SAP system.
25 I think that is very distinctly different from access to

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1 the front end Horizon IT System.

2 **Q.** So, to your mind, because the example given was one
3 relating to SAP, you're saying that you had understood
4 that to be materially different, that is to say the
5 nature of privileged access to SAP you understood to be
6 materially different to the privileged access that was
7 available in Horizon?

8 **A.** Absolutely.

9 **Q.** Thank you.

10 That deals with privileged access. Do you recall
11 receiving a further report from Angus Grant of Ernst &
12 Young in August 2012?

13 **A.** Yes.

14 **Q.** Can that be shown, please. That bears the reference
15 POL00143525.

16 Forgive me, the second page, please, we see the
17 management -- it must be third page, sorry -- the
18 management letter addressed to you, Mr Day. I don't
19 propose to take you through the control themes and
20 observations because we've seen those summarised in
21 Ms Sewell's briefing to you. Do you accept that they
22 are materially -- that what you were told by Mr Grant
23 was materially the same as Ms Sewell had summarised to
24 you in her briefing, namely that the recommendations in
25 relation to reviewing privileged access and implementing

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1 the production of that report, which has been disclosed
2 to the Inquiry. That bears the reference POL00295091.
3 Thank you. If we scroll down, please. Thank you. The
4 first email in the chain is from Sarah Hall, who, as we
5 know, was a Financial Controller of Post Office Limited,
6 and she addresses the email firstly to you and then to
7 other Senior Managers in the Post Office.

8 The subject is "[Royal Mail Group Audit and Risk
9 Committee] paper draft re Horizon -- urgent for review
10 by [Thursday] midday". She explains:

11 "Dear all,
12 "The [Royal Mail Group Audit and Risk Committee]
13 requested a paper on the IT controls and Horizon claims.
14 With input from various experts this has now been
15 drafted but is clearly a sensitive area so I attach the
16 draft for your review and comments before it goes to
17 Group for circulation to the ARC."
18 So I think, in fairness, as it says there, the
19 original draft put together by others but brought to
20 your attention for review and comment before it was
21 submitted?

22 **A.** Correct.

23 **Q.** Could we turn, please, to the draft that was appended to
24 this email, which bears the reference POL00295092.
25 Thank you. So this paper bears the heading "Update on

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1 controls had not yet been carried out?

2 **A.** Yes. Correct.

3 **Q.** Thank you. I'd like to move on to a new topic, please.
4 This relates to the actions which you took to report
5 risks relating to Horizon to the Board of Royal Mail
6 Group. In December 2011, a report was submitted in your
7 name to the Audit and Risk Committee of Royal Mail
8 Group, addressing Horizon controls and Post Office's
9 relationship with Fujitsu; is that correct?

10 **A.** Correct.

11 **Q.** This was approximately four months into your tenure as
12 CFO and was before Post Office Limited had formally
13 separated from Royal Mail Group; is that right?

14 **A.** That's right.

15 **Q.** Although the report went out in your name, I think it's
16 your evidence that you had very limited input into its
17 preparation; is that right?

18 **A.** Yes, I would have taken responsibility for the contents
19 and, as I think I referenced in my statement, it was
20 a request at a previous Royal Mail Group Audit, Risk and
21 Compliance Committee that I should come with a paper
22 addressing the concerns which I think related to Private
23 Eye, amongst other things, and so -- no, I take --
24 I took and I take full responsibility for that paper.

25 **Q.** Please could we bring up some correspondence relating to

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1 Post Office Limited Horizon Controls and Relationship
2 with Fujitsu", and it states its purpose to be:
3 "[To set out] the controls that operate around the
4 Post Office Limited Horizon system, the relationship
5 with Fujitsu and why the Post Office is able to rely on
6 these controls in the light of:
7 "[Firstly] IT control issues identified at last
8 year's audit; and
9 "[Secondly] possible challenges against the
10 integrity of the Horizon platform."
11 Overall, stepping back, the purpose of this paper
12 was to give assurance to the Audit and Risk Committee
13 about the integrity of the Horizon system; is that fair?

14 **A.** Yes.

15 **Q.** Now, under the heading "Background", at paragraph 2, of the
16 draft report refers to the findings of Ernst & Young's
17 audit for the financial year 2010 to 2011, so that was
18 the original management letter that you saw shortly
19 after your arrival into post. It said this:
20 "There were a number of IT [controls] identified
21 during the 2010-11 year end Ernst & Young audit. These
22 were largely centred on Fujitsu and a number of
23 recommendations were included in the management letter
24 following the audit. Unlike other RMG IT suppliers,
25 Fujitsu does not have an SAS70 or equivalent report on

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1 its controls and the consequences of this is that EY
2 needs to do full testing of all systems which are
3 integral to the financial results."

4 No mention was made here, or anywhere else in the
5 report, of Ernst & Young's findings that Horizon had
6 inappropriate system privileges which potentially called
7 into question the financial integrity of the system, did
8 it?

9 **A.** That's true.

10 **Q.** When you read this draft report, did that not strike you
11 as a significant omission, namely the failure to
12 acknowledge such a findings by POL's independent
13 auditors?

14 **A.** No. I think this paper attempted to paint the whole
15 picture of the relationship with Fujitsu contractually.
16 The issues -- it alluded to the issues that had arisen
17 in the 2010/11 audit. I don't think it would have been
18 necessarily appropriate to go into those in a great deal
19 of detail and, moreover, the issue -- the fourth of the
20 four issues identified, which now, of course, we
21 understand to have much greater significance -- would
22 not have had that huge a significance at the time.

23 So I don't think this was in any way hiding the
24 detail of what Ernst & Young had found. I think it's
25 an attempt to summarise the fact that there had been

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1 because it was simply going to streamline the process of
2 testing the IT controls. So that in and of itself
3 wasn't an answer to claims about Horizon's integrity,
4 was it?

5 **A.** It wasn't an all encompassing answer; it was an answer
6 to the question: can we depend on Horizon to provide
7 accurate financial data, bearing in mind the Royal Mail
8 Audit, Risk and Compliance Committee was engaged in
9 making sure that the -- primarily, that the financial
10 accounts were accurate.

11 **Q.** The one issue in Ernst & Young's management letter which
12 did go directly to the financial integrity of Horizon
13 was privileged access, was it not?

14 **A.** I think I would agree with that in hindsight.
15 I don't --

16 **Q.** Yet --

17 **A.** -- think I had that understanding at the time.

18 **Q.** But that, that one issue, was not mentioned in this
19 report?

20 **A.** No, simply that I don't think it had particular
21 resonance. I don't think we saw, if you like, the first
22 three points of those four summary points that Ernst &
23 Young had made as distinct from the fourth point being
24 the privileged access point. That's taken on far
25 greater significance since those days.

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1 issues, they largely related to Fujitsu, they were being
2 worked through, and the backdrop to -- as I mentioned
3 before, to this discussion at the Royal Mail Group ARC
4 was a previous lobbying for me and others to get Fujitsu
5 to assure their system.

6 So that's largely the question that we were -- the
7 exam question that we were trying to answer in this
8 paper. It wasn't to give the Royal Mail Group Audit
9 Committee an absolutely full, blow-by-blow explanation
10 of everything that had come up in the '10/'11 Ernst &
11 Young audit.

12 **Q.** I'm not suggesting that you would have been expected to
13 go into that level of detail but the context of this
14 report was, was it not, that claims were being made
15 about Horizon's lack of financial integrity, and you've
16 been asked by the committee to provide a report
17 addressing those claims; that's correct, isn't it?

18 **A.** Broadly yes, but --

19 **Q.** Sorry --

20 **A.** It's all of those issues that were itemised in the
21 2010/11 Ernst & Young management letter and the solution
22 was seen as the earliest possible adoption of SAS70 or
23 equivalent.

24 **Q.** You accepted earlier that a SAS70 report was not going
25 to provide complete assurance on the Horizon system

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1 **Q.** Some of this paper draws very heavily on Mr Ismay's
2 original report of August 2010 --

3 **A.** Yes.

4 **Q.** -- would you agree with that?

5 **A.** Yes.

6 **Q.** What it doesn't contain is any reference to the known IT
7 issues that Mr Ismay mentioned in that report; do you
8 accept that?

9 **A.** I do accept that.

10 **Q.** Why is that?

11 **A.** Because, as I said earlier, I don't think those were --
12 I think there were two categories of bug or anomaly: the
13 ones generated at the terminal through input errors,
14 potentially; or the more, shall I say, customer -- ones
15 which impacted customers more, and that subcategory that
16 Mr Ismay referred to in his note around screen freezes,
17 incomplete transactions, subpostmasters not sure whether
18 a transaction had gone through or not, the barcode
19 sticking, these were, in my view -- and I believe
20 others' view -- these were routine problems that would
21 get resolved from time to time and that would have
22 an impact on customers, and that was a large focus at
23 the time.

24 But I don't think they're things which would
25 naturally have lent themselves to a review with the

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1 Royal Mail Group Audit Committee about concerns around
2 Horizon generally.

3 **Q.** Was the purpose of this report simply to identify all
4 the positive control measures that were in place but not
5 to actually give a full warts and all assessment of the
6 true position; is that really where we ended up with
7 this report, do you think?

8 **A.** No, I think at the time I viewed this as -- I accept the
9 point that this is heavily, heavily influenced by the
10 earlier Ismay Report and, indeed, Mr Ismay had a large
11 input into compiling this report but, equally, I placed
12 reliance on the objectivity of my Financial Controller,
13 who was a very good Financial Controller, to critically
14 evaluate that information, and I think that this --
15 I certainly thought and I still think, that this
16 presented a fairly fair and balanced view of the
17 situation.

18 It comprises reference to expectations of Fujitsu,
19 acknowledgement that we don't have the right
20 certification in place, acknowledgement that there have
21 been challenges to the integrity of Horizon, and an
22 intention to -- a clear pathway to show what we're going
23 to do about it.

24 **Q.** Please could we return to the email correspondence of
25 30 November 2011. Thank you. We can see there in the
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1 Criminal Law) has advised that were that not the case
2 then current prosecutions would have to be stayed. It
3 is important to make clear [Ernst & Young] did not
4 challenge the integrity of accounting data in the
5 system."

6 Again, we see here a very clear concern being
7 expressed by Mr Ismay that any challenge to the
8 integrity, financial integrity, of Horizon would
9 undermine the safety of Post Office's private
10 prosecutions; do you agree with that?

11 **A.** I would have -- as I said earlier, my primary focus
12 would have been on the first half of this paragraph and
13 the last line because I'd have been considering the
14 impact on the veracity of our financial statements.
15 I mean, rereading this -- I don't recall reading this at
16 the time but rereading this recently, I'm shocked at the
17 rationale that's given and I don't understand -- to me,
18 it's a *non sequitur* anyway.

19 Either the data has integrity for accounting and
20 reporting purposes or it doesn't and the last thing that
21 would have been on my mind would have been linking it to
22 previous criminal cases, or -- and/or staying
23 prosecutions. I can't understand why those two things
24 would have been drawn together.

25 **Q.** Thank you. I'd like to address another topic with you,
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1 top half of the page Mr Ismay's response to Ms Hall's
2 original email enclosing the draft. He writes, and
3 you're copied in -- not copied, forgive me, one of the
4 addressees of the email. His first comment in relation
5 to paragraph 1, he requests that a sentence be added:

6 "... along the following lines 'The IT control
7 issues identified during the audit did not question the
8 integrity of accounting data in the system. Rather,
9 they were recommendations about the documentation and
10 authorisation of changes to systems and about
11 opportunities for streamlined assurance'."

12 Pausing there, did that strike you as an accurate
13 statement of the findings which Ernst & Young had made
14 in their 2010/11 audit?

15 **A.** At the time, yes.

16 **Q.** And now?

17 **A.** Less so now, given what we now know about Horizon.

18 **Q.** Given what we now know about Horizon or, more
19 specifically, about privileged access?

20 **A.** Yes.

21 **Q.** Mr Ismay goes on to say:

22 "The rationale for this [that is to say for
23 requesting that amendment] is that for purposes of
24 ongoing [Royal Mail Group] Criminal Prosecution
25 activity, Rob Wilson ([the Royal Mail Group] Head of
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1 which concerns the response to Second Sight's Interim
2 Report.

3 Sir, with your permission, I propose to deal with
4 this topic and then see where we are. It may be that we
5 can take a slightly earlier break for lunch but, rather
6 than taking another morning break, sir, unless you --

7 **SIR WYN WILLIAMS:** Oh no, you deal with it in whichever way
8 you think appropriate, Ms Hodge.

9 **MS HODGE:** Thank you, sir. You say in your statement that
10 you don't recall having any direct involvement in the
11 instruction of Second Sight or the day-to-day management
12 of their work; is that correct?

13 **A.** That's correct.

14 **Q.** Given your oversight of Product and Branch Accounting,
15 which -- to which you referred earlier, do you think you
16 ought to have been involved in the engagement of Second
17 Sight as forensic accountants who would be looking at
18 cases handled by that division?

19 **A.** Not necessarily. Yes, they would have been looking at
20 historic allegations about the Horizon system. I would
21 have expected to have been kept briefed on progress.
22 I would not have expected to have been involved in their
23 work more closely than that and, indeed, I was, I was
24 kept briefed, I believe, from time to time.

25 **Q.** As a member of the Board, you received updates in
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1 relation to Second Sight's investigation; is that
 2 correct?
 3 **A.** Yes.
 4 **Q.** These culminated in a Board meeting on 1 July 2013, in
 5 which the Board received an update from the Chief
 6 Executive, shortly before the Interim Report was
 7 finalised and circulated to interested parties; is that
 8 right?
 9 **A.** That's right.
 10 **Q.** Please could we look at the minutes of that meeting on
 11 1 July, they bear the reference POL00021515. We can see
 12 there from those present -- you're the last named under
 13 those "Present" -- in attendance were the Chairman and
 14 Chief Executive, Non-Executive Directors and other
 15 directors of the company.
 16 If we scroll down, please, the first item on the
 17 agenda was Horizon, and it states:
 18 "The CEO apologised for the short notice in keeping
 19 the Board updated but explained that issues had arisen
 20 over the last couple of days. She gave an update on the
 21 Horizon review which was being undertaken by Second
 22 Sight and their Interim Report which was to be presented
 23 at a meeting of MPs on 8 July. The investigation to
 24 date had found no systemic issues with the Horizon
 25 computer system but had highlighted areas for
 69

1 they'd been dealt with to ensure that no subpostmaster
 2 was out of pocket?
 3 **A.** I don't think I gleaned it from this update but
 4 I gleaned it on reading the Second Sight Report a short
 5 while later.
 6 **Q.** When you read the Second Sight Report, you discovered,
 7 I think you say, the existence of those two bugs, the
 8 receipts and payments mismatch bug and the local
 9 suspense account bug; is that correct?
 10 **A.** It is, yes.
 11 **Q.** Bearing in mind that you had oversight of the division
 12 that was responsible for identifying any alleged
 13 accounting errors arising from those bugs, did it
 14 surprise you to learn this for the first time from,
 15 I suppose, firstly, Ms Vennells' update but the detail
 16 from Second Sight's Report?
 17 **A.** Yes, it did.
 18 **Q.** Did it concern you that these anomalies were known to
 19 the business but had not been previously brought to your
 20 attention as CFO?
 21 **A.** I can't remember if it concerned me. I was surprised
 22 and I remember being assured and you can see through the
 23 Second Sight Report that Post Office had assured them
 24 that these bugs had been rectified and there'd been no
 25 detriment to any subpostmasters but I regret that
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1 improvement in support areas such as training."
 2 You state in your evidence that the Board -- by
 3 which, presumably, you meant you as well -- had felt
 4 reassured by this update, particularly by the suggestion
 5 that there were no systemic issues in the system; is
 6 that correct?
 7 **A.** That's correct.
 8 **Q.** Ms Vennells, however, went on to explain, under
 9 subparagraph (b):
 10 "... like any large computer system, [Horizon] would
 11 occasionally have anomalies and two were [known] over
 12 recent years. The Business had dealt with these
 13 anomalies to ensure no subpostmaster was out of pocket
 14 and these anomalies had not affected any of the cases
 15 which Second Sight had reviewed. Second Sight had been
 16 told of these anomalies and they would include them in
 17 their report."
 18 At the time of this update, did you know to what
 19 Ms Vennells was referring by "these two anomalies"?
 20 **A.** I didn't, no.
 21 **Q.** It would have been apparent to you, would it not, from
 22 the update that you received that they related to
 23 accounting errors in the system?
 24 **A.** *(No audible answer)*
 25 **Q.** Would you have gleaned that from the suggestion that
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1 I didn't take any closer action, follow-up action, to
 2 understand why I had not known about these earlier.
 3 **Q.** So at the time, then, would you have been concerned that
 4 this discovery called into question the accuracy and
 5 reliability of the reporting lines to you as CFO? Are
 6 you saying only with hindsight?
 7 **A.** I think with hindsight, certainly.
 8 I can't recall having been alarmed but I'm not sure
 9 now -- knowing what I know now, I think I should have
 10 been alarmed. I should have been concerned but I don't
 11 think I was at the time. I think I took, unfortunately,
 12 assurance that these matters were in the past, had been
 13 remediated, had been dealt with, and I probably put them
 14 into that category of relatively routine things which go
 15 wrong with an IT system and get fixed. Sorry, I don't
 16 think I made a connection to how on earth can I rely on
 17 my financial data if these two things have happened in
 18 the past without my knowledge? I don't think I made
 19 that connection.
 20 **Q.** Did you take any steps after these anomalies, these
 21 bugs, were brought to your attention, to assure yourself
 22 that any accounting errors caused by them had, in fact,
 23 been identified and remedied?
 24 **A.** I don't recall but I think it's unlikely that I did.
 25 I don't --
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1 Q. Why is that?
 2 A. Well, I have no recollection of making any specific
 3 intervention. As I say, I think I would have -- I think
 4 on the basis of what I read in the Second Sight Report
 5 I would have been surprised to learn about them. Then
 6 maybe slightly perturbed that they had been divulged by
 7 Post Office, apparently to Second Sight, so slightly
 8 perturbed that I wasn't part of that disclosure process.
 9 But, in terms of my primary focus of does this give me
 10 cause for concern about the accuracy of my financial
 11 statements, no, it wouldn't have done.
 12 You know, looking at the number of cases and looking
 13 at the order of magnitude, I'm afraid I would have
 14 simply been applying a materiality filter to that.
 15 Q. Which is to say that the value of any accounting
 16 shortfall would not have been sufficiently high to
 17 register with you as a significant risk at a business
 18 level?
 19 A. Well, yes, twofold: firstly, I was assured they'd been
 20 remediated and that no subpostmaster was out of pocket
 21 because, clearly, they could have been material sums for
 22 an individual subpostmaster but then, with my CFO hat
 23 on, you know, do these make me concerned that I've
 24 misstated my accounts? No.
 25 Q. Thank you. On the following page, the minutes of the
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1 to challenge Second Sight where appropriate to be more
 2 specific, to try to draw out themes, particularly, my
 3 interest being in can we find things which are more
 4 widespread, that there might be something we can do
 5 about, and to reduce the degree of perceived anecdotal
 6 or lack of evidence-based findings. That's the general
 7 sense but I don't have a specific memory of the
 8 conversation.
 9 Q. Between the date of this meeting on 1 July and the next
 10 meeting of the Board on the 16th, Ms Vennells provided
 11 several updates to the Board via email; do you recall
 12 that?
 13 A. I know that a lot happened in those two weeks and
 14 I don't recall everything that happened but, through
 15 this Inquiry process, I've been able to piece together
 16 quite a lot of what I think happened, such that, as I'm
 17 sure we'll come on to discuss, the tone of the 16 July
 18 Board meeting was really markedly different from that of
 19 1 July.
 20 Q. I'd like to explore with you a little bit why that might
 21 be. Now, one of the risks which Ms Vennells identified
 22 in her emails to the Board related to the reopening of
 23 past prosecutions brought by Post Office as a result of
 24 Second Sight's findings. Do you recall that risk being
 25 raised?

1 meeting record that:
 2 "The [CFO] was concerned that the report from the
 3 independent forensic accountants was not as factual as
 4 expected and could lead to loose language at the MP
 5 meeting."
 6 A. CEO.
 7 Q. Sorry, the CEO, forgive me. At subparagraph (d):
 8 "The Board asked the Business to challenge Second
 9 Sight to ensure changes were made to the report where
 10 possible and asked the Business to prepare their
 11 communication to combat any inaccuracies."
 12 Can you explain, please, the reference in the
 13 minutes to the Board asking POL to challenge Second
 14 Sight to ensure that changes were made to the report?
 15 A. I don't recall the specific -- this specific part of the
 16 conversation but my general recollection is that there
 17 was a disappointment with the lack of evidence-based
 18 findings. You referenced earlier the periodic updates
 19 from the CEO through the course of the Second Sight
 20 investigation, which were broadly that there was nothing
 21 systemically wrong with the system but that some of the
 22 language used was quite emotive, some of the examples
 23 seemed to be anecdotal and not evidence based and that
 24 was the general feeling from that meeting.
 25 So I think that's the context for the board seeking
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1 A. I don't. I've seen the -- seen a document, which --
 2 from Ms Vennells, which was updating the board on the
 3 progress of meetings with, I believe, James, now Lord,
 4 Arbuthnot and other MPs, and I think it was in that
 5 document, which is broadly positive in terms of the
 6 findings and the discussion with MPs, but references,
 7 I think, Lord Arbuthnot's concern or determination that
 8 we should go back and look at previous prosecutions as
 9 a bit of a frustration for Ms Vennells. So I -- but
 10 I've seen that recently. I don't recall having read
 11 that note at the time.
 12 Q. Can we please turn up your statement at WITN10000100,
 13 please, at page 24, please, paragraph 69. Thank you.
 14 You're referring here -- perhaps if we go back a page
 15 just to place that in context, sorry. Thank you.
 16 You were asked questions in your Rule 9 Request
 17 about financial and reputational risk and you refer here
 18 to an email from Ms Vennells dated 6 July, in which, in
 19 advance of the publication of the Interim Report, she
 20 identified one of the main reputational and potentially
 21 financial risks arising from the review relates to
 22 possible attempts to reopen past prosecutions based on
 23 the findings. Now, you say:
 24 "I do not remember this being discussed by the Board
 25 but I do not believe this was a significant financial
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1 concern. My recollection is that we believed only
2 a small number of historic cases would be affected,
3 leading to a limited number of possible compensation
4 claims, which, from a POL financial reporting
5 perspective, would be immaterial in quantum."

6 Now, it might be suggested that here you're trying
7 to downplay somewhat the significance of the risks
8 relating to the reopening of past criminal cases; would
9 that be fair?

10 **A.** No.

11 **Q.** You do, however, dismiss the financial risk as being one
12 that's really immaterial to you as CFO, in terms of its
13 quantum?

14 **A.** That was my perception at the time and the context would
15 be the Second Sight Report. So I had not made the
16 direct connection, nor had I been party to the
17 conversation with MPs, and the determination to include
18 past prosecutions in the findings. Perhaps -- my
19 perhaps naive view at the time was that there would be
20 a small number of people who might need to be
21 compensated but that was, in my mind, in relation to the
22 findings of the Second Sight Report, primarily around
23 poor support and training to subpostmasters.

24 **Q.** This wasn't the first time that someone within Post
25 Office had raised a concern about the reopening of

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1 way of update:

2 "The CEO explained that although Second Sight's
3 report had been challenging it had highlighted some
4 positive things as well as improvement opportunities.
5 The Business had been praised in Parliament for setting
6 up the independent review; the proportionality of the
7 tiny number of cases had been emphasised ..."

8 That's a point that you've, in fairness, raised
9 a few times:

10 "... and no systemic issues had been found with the
11 Horizon computer system. However there were cultural
12 issues which had to be addressed to improve the support
13 we gave to subpostmasters. The CEO stressed this was
14 now a catalyst to make changes in the Business."

15 The section I want to ask you about is (b), please,
16 where it reads:

17 "The Board were concerned that the review opened the
18 Business up to claims for wrongful prosecution."

19 Now, in your statement you say, about this minute --
20 we don't need to bring it up unless you wish to see
21 it -- but it reads:

22 "I do not recall who made that comment that led to
23 the minute [that I've just cited]. I don't recall what
24 the specific basis for this concern was."

25 Again, it might be suggested that, in your evidence,

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1 criminal prosecutions with you, was it?

2 **A.** Remind me?

3 **Q.** In Mr Ismay's original report to you, he specifically
4 addresses the risk of reopening cases if Horizon is
5 found not to have integrity. We saw that raised again
6 in the email of November 2011, so was this not something
7 of which you were aware, a perception of a greater risk
8 to the business, possibly an existential threat, even?

9 **A.** No, it wasn't and, indeed, there's a two-year hiatus
10 between those two references -- a three-year hiatus in
11 one case and two years in the second case -- of those
12 connections you just attempted to make. So no, they
13 absolutely would not have been in my thought and,
14 therefore, I would not have written in my statement that
15 I thought we were only dealing with a small number of
16 compensation cases at this stage.

17 **Q.** Second Sight's Interim Report was addressed again at the
18 Board meeting on the 16th, as you have referenced
19 already. I think you recall -- is it fair to say you do
20 recall that meeting, the tone of it, now?

21 **A.** Yes.

22 **Q.** Please can we bring up the minutes of that meeting.
23 Those are at POL00021516. Thank you. It's at page 6,
24 please, where we see Second Sight's Interim Report was
25 discussed. Thank you. So, in the first paragraph, by

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1 you're seeking to distance yourself from the seriousness
2 and significance of the concerns that are being voiced
3 at this stage as to the implications that Second Sight's
4 findings had for Post Office's past criminal
5 convictions; is that fair?

6 **A.** No. Could I add a little more?

7 **Q.** Please.

8 **A.** My -- having not been involved in the Second Sight work,
9 really at all, my views were informed by the periodic
10 updates provided generally by the CEO, occasionally by
11 the General Counsel. So I think the summary in the
12 minutes under (b) is exactly what my understanding would
13 have been at the time. I've been able to, through this
14 Inquiry process and on receipt, fairly recently, of
15 other documents, to understand a little bit more of the
16 background to why you can see reported under (c) the
17 Board felt that the business had not managed the
18 assignment well, and then, if we come on to talk about
19 the requests of me to look into the insurance situation,
20 why I can now understand, but didn't at the time, the
21 Board had that specific concern about potentially
22 being -- opening ourselves up to claims of wrongful
23 prosecution.

24 So, sorry, that's a very long answer but, in terms
25 of the core document, the Second Sight Review itself,

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1 and my reading of this minute, which is the only thing
 2 I had until recently, I did not have a perception that
 3 either of those had, in themselves, opened us up to
 4 claims of possible wrongful prosecution.
 5 **Q.** I'd just like to test with you a little bit, Mr Day,
 6 what you did know, from what we've discussed so far
 7 today. You knew, upon reading Second Sight's Report
 8 that it had identified two faults in Horizon Online,
 9 which we've mentioned, the two bugs; that much you
 10 accept, yes?
 11 **A.** Yes.
 12 **Q.** You also knew from Ms Vennells' update that those faults
 13 had caused accounting errors which had had to be
 14 rectified; that's correct, isn't it?
 15 **A.** Well, I knew that from the reading the Second Sight
 16 Report, yes.
 17 **Q.** Either the report or the update?
 18 **A.** Yes.
 19 **Q.** You would have appreciated at the time, would you not,
 20 that the existence of such faults potentially called
 21 into question the integrity of Horizon's financial
 22 accounting? You were alive to that risk, surely?
 23 **A.** Potentially.
 24 **Q.** You would also have appreciated, would you not, that
 25 POL's knowledge of these faults called into question the

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1 and that's why I say I don't know -- I'm not saying it
 2 didn't happen. Clearly, it was expressed by somebody on
 3 the Board but I don't know who that was or in what
 4 context.
 5 **Q.** As you've acknowledged, the Board was sufficiently
 6 concerned, was it not, about this issue that it asked
 7 you to investigate the insurance position and to ensure
 8 that Royal Mail Group and Post Office Limited notified
 9 their insurers of the review's findings?
 10 **A.** Yes.
 11 **Q.** We can see the action for that on page 7, please --
 12 thank you:
 13 "The CFO was asked what the insurance position was.
 14 He promised the Board a note on this. He was also asked
 15 to ensure that both RMG and the Business's insurers were
 16 given notice of the review findings."
 17 Now, do you recall what action you took to comply
 18 with that instruction?
 19 **A.** I don't recall the note, whether I wrote a note or not.
 20 I did take action to ensure that both Royal Mail Group
 21 and Post Office's insurers or their brokers were given
 22 notice of the findings, and the reason that Royal Mail
 23 Group were involved is that one of the policies, the
 24 Directors' and Officers' policy, was actually still part
 25 of Royal Mail, it was in a six-year run-off period since

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1 confidence which it stated in Horizon's integrity?
 2 **A.** Yes.
 3 **Q.** You were aware from the regular updates that the Board
 4 received from Ms Crichton, General Counsel, that POL was
 5 still bringing prosecutions and recovering assets from
 6 subpostmasters and employees in reliance on Horizon
 7 data. You knew that, did you not?
 8 **A.** Yes, I would have known that, yes.
 9 **Q.** Did those matters, taken together, not provide
 10 sufficient reason to be concerned that POL might face
 11 claims of wrongful prosecution?
 12 **A.** They might have been but they weren't in my mind at the
 13 time. So if I look at the Second Sight Report and the
 14 periodic updates that I was receiving, it was that there
 15 were no systemic issues with the system. There were the
 16 four spot reviews identified, which -- particularly
 17 SR05 -- would have been of concern but these were, as
 18 I understood it, work in progress. More work needed to
 19 be done by both Second Sight and Post Office to
 20 establish exactly the veracity of these particular
 21 claims or issues.
 22 So, no, I don't think -- I mean, I genuinely was
 23 surprised by the comment in the minutes that, on the
 24 basis of what I understood and had been party to, we had
 25 opened ourselves up to claims of wrongful prosecution,

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1 2012, so we shared responsibility for that. So I would
 2 have had to have reported it to Royal Mail Group.
 3 I don't think I did it personally. I think I did it
 4 through a direct report of mine who looked after
 5 insurance.
 6 **Q.** I wonder, please, if we could turn to POL00108035.
 7 Thank you. This appears to be your first update on this
 8 matter, so if we could scroll, please, to the bottom of
 9 the document, where the email chain starts. Thank you.
 10 That's the bottom of the email. So if we could please
 11 just get to the top of that first message. Thank you.
 12 So this is dated 19 July 2013, addressed to Alwen Lyons,
 13 Company Secretary, it reads:
 14 "Dear All
 15 "On Tuesday the Board asked for information on three
 16 things this week:
 17 "A paper on Transitional Support Services with
 18 Fujitsu which we agreed would be considered by
 19 corresponded.
 20 "The impact of the Financial Services Junction
 21 insurance changes, and the continued Transitional
 22 Support from Fujitsu, on the strategic plan and bottom
 23 line (including the P&L [profit and loss, presumably]
 24 and cash flow changes).
 25 "[Thirdly] The impact on Horizon/Second Sight on our

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1 insurance cover.
 2 "The first two points are covered by the attached
 3 and the final one is explained by Chris below."
 4 It reads:
 5 "Insurance
 6 "We discussed what impact the current Horizon issues
 7 might have on our insurance on which we are advised by
 8 our insurance broker, Miller. Their view is that whilst
 9 other insurance policies may be impacted the most likely
 10 one is D&O ..."
 11 You've just explained that was a reference to the --
 12 **A.** Directors' and officers'.
 13 **Q.** Thank you.
 14 "... this had the added complication as it is the
 15 only policy we share with [Royal Mail] and was shared by
 16 their broker, JLT."
 17 Do you recall who that's a reference ...
 18 **A.** Yes, I don't recall what it stands for.
 19 **Q.** "The excess on this policy varies under different
 20 criteria but the main one is £25,000 on each and every
 21 claim. A meeting is being set up with JLT and Miller to
 22 ensure they are fully briefed on the issues before JLT
 23 engage with the insurer."
 24 Thank you, that's your first update. We see the
 25 issue of insurance arises again, however, and you

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1 very small number of cases which affected your
 2 assessment of materiality. By this stage, Post Office
 3 had received 150 applications. Had that changed your
 4 assessment --
 5 **A.** Yes.
 6 **Q.** -- of the seriousness and significance of this issue?
 7 **A.** Yes, I still felt -- we still felt, that we were dealing
 8 with compensation but, clearly, through the course of
 9 the second half of 2013 and into 2014, the number of
 10 applications and the size of some of the compensation
 11 requests, however one might attempt to scale them, were
 12 orders of magnitude bigger than we had originally
 13 envisaged or imagined as a direct result of the Second
 14 Sight Review back in July 2013.
 15 So, yes, this absolutely was now material. It was
 16 not just material to me financially; it was taking up
 17 a huge amount of management time across the
 18 organisation.
 19 **Q.** Now, so far as your assessment was concerned, the making
 20 of payments under the scheme would not attract insurance
 21 covering; is that correct?
 22 **A.** Yeah, I think my developing understanding of the
 23 insurance position was -- and I'm talking here about
 24 professional indemnity, rather than D&O insurance --
 25 that compensation, if defined as goodwill, in relation,

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1 produce a paper to the Board in March 2014. This is
 2 POL00027430. This is entitled "Insurance issues arising
 3 from the Complaints and Mediation Scheme":
 4 "The purpose of this paper is to set out the
 5 insurance-related issues for the Complaints and
 6 Mediation Scheme and is an update to the paper committed
 7 to the Board reading room in December 2013."
 8 In terms of the nature of the risks identified, you
 9 describe these at paragraph 3, please:
 10 "So far [circa] 150 applications have been received
 11 of which only about a third have been worked through so
 12 the assessment below is based on our estimation of the
 13 issues. It is possible, but unlikely, that the pattern
 14 of cases might develop in a way that chases this
 15 assessment."
 16 So, pausing there, this is, of course, a reference
 17 to the establishment of the Complaint Review and
 18 Mediation Scheme -- that's correct --
 19 **A.** Yes.
 20 **Q.** -- and the number of applications received by that
 21 scheme for compensation --
 22 **A.** Yes.
 23 **Q.** -- arising in connection with faults in Horizon?
 24 **A.** Arising from the findings of Second Sight Report.
 25 **Q.** Now, earlier on, you, in your evidence, emphasised the

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1 for example, to Post Office having poorly supported or
 2 trained subpostmasters, failed to provide them with the
 3 requisite tools to do the job properly, could lead to
 4 compensation claims which would not be covered by PI
 5 insurance, ie PI insurance, as I understood it, would be
 6 limited -- cover would be limited to issues for which
 7 Post Office was legally liable.
 8 **Q.** That is to say for which they had a legal obligation to
 9 pay --
 10 **A.** Yes.
 11 **Q.** -- compensation. Now, one of the aspects of the
 12 concerns of the Board is not simply the business's
 13 liable but it was the individual liability of directors;
 14 is that correct?
 15 **A.** It is.
 16 **Q.** Did you personally have a concern yourself?
 17 **A.** I don't recall having a concern and, going back through
 18 all of the documentation, it's clear that there were
 19 lots of different conversations around insurance, both
 20 at the Board and outside of the Board, and different
 21 non-execs expressing concern about the lack of clarity
 22 that I had provided on insurance, and it's difficult to
 23 work out from where each person was coming, whether it
 24 was on behalf of the organisation, in terms of
 25 professional indemnity cover, or whether it was on

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1 behalf of themselves in terms of possible breaches of
2 directors' duties or errors through the D&O mechanism.

3 It wasn't entirely clear where all of these
4 different challenges and questions were coming from.

5 **Q.** What was your perception at the time as to where the
6 focus lay, as between the Board's interest in their own
7 exposure and the exposure of the business?

8 **A.** My recollection is that the very first conversations
9 were around D&O, and I think that's -- but I have to
10 caveat that with I didn't have a full and detailed
11 understanding of exactly which policies might apply in
12 which circumstances but, if I go back to the very
13 beginning of the conversation, which is that Board
14 meeting of 16 July, my very clear understanding was we
15 were talking about potential compensation and,
16 therefore, I don't think it would have been in my mind
17 that D&O was the appropriate cover. But I can't speak
18 for others.

19 **MS HODGE:** Thank you, sir. That brings me to the end of
20 that topic. I wonder whether, if you would be content
21 if we take an early lunch break and return at 1.30 to
22 finish my questions for Mr Day and then to hand over to
23 recognised legal representatives?

24 **SIR WYN WILLIAMS:** Yes, by all means. So as you have
25 suggested, we will adjourn now and resume at 1.30.

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1 **Q.** Linklaters had identified, in its advice to the Post
2 Office Board, that there did not exist an objective
3 report which addressed the use and reliability of
4 Horizon; is that right?

5 **A.** Correct.

6 **Q.** The Board therefore decided that it would instruct
7 Deloitte to produce such a report; is that a fair
8 summary?

9 **A.** Yes.

10 **Q.** Now, if we could look, please, at the minutes of the
11 Board meeting on 30 April 2014, these are at
12 POL00021524. Thank you.

13 So these are the minutes of the meeting on 30 April.
14 We can see at page 6, please, the discussion of the
15 Deloitte report into Horizon.

16 Now, just pausing there, I think it's right to say
17 that you didn't lead on this work as such; it was led by
18 the CIO, Lesley Sewell; is that correct?

19 **A.** Correct, and Chris Aujard, the General Counsel.

20 **Q.** The then General Counsel?

21 **A.** Yeah.

22 **Q.** So the extent of your involvement was insofar as you
23 received updates as a member of the Board and were shown
24 a copy of the report; is that correct?

25 **A.** Correct.

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1 **MS HODGE:** Thank you, sir.

2 (12.26 pm)

3 (The Short Adjournment)

4 (1.30 pm)

5 **MS HODGE:** Good afternoon, sir, can you hear and see us?

6 **SIR WYN WILLIAMS:** I can, thank you.

7 **MS HODGE:** Thank you.

8 Mr Day, good afternoon. The next topic I'd just
9 like to deal with, please, is the Horizon Desktop Review
10 carried out by Deloitte. Now, as part of actions
11 arising from Second Sight's findings, the Post Office
12 commissioned a review by Deloitte into the integrity of
13 Horizon; is that correct?

14 **A.** That's correct.

15 **Q.** This report became known as the Horizon Desktop Review
16 of Assurance Sources and Key Control Features but,
17 before we turn to that report, I would like to ask you
18 some questions about the reasons why it was
19 commissioned.

20 Now, just by way of background POL had instructed
21 Linklaters LLP to advise on the business's potential
22 liability to claims from subpostmasters who had wrongly
23 been held accountable for shortfalls shown by Horizon;
24 is that right?

25 **A.** That's correct.

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1 **Q.** So this confirms that the Board welcomed Lesley Sewell,
2 Chief Information Officer. She wasn't a regular
3 attendee at the Board; is that correct?

4 **A.** Correct.

5 **Q.** She dealt with matters as and when she needed to, and
6 Gareth James, a partner at Deloitte, then welcomed to
7 the meeting, and Chris Aujard, the General Counsel, also
8 rejoined the meeting:

9 "The Chairman thanked Gareth James for his draft
10 report and explained that there were a number of people
11 who were sceptical about Horizon. The Board were
12 concerned to know the truth about the reliability of the
13 system. Deloitte's views would need to be expressed in
14 such a way that they would persuade reasonable lay
15 people."

16 Does that accurately summarise your understanding as
17 to what was being sought from Deloitte at this stage?

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

19 **Q.** Essentially, a report that would show others or prove to
20 others that POL was right to have confidence in the
21 system?

22 **A.** Yes, although I think somewhere else it says in the
23 minutes that the Chair expressed a view that it would be
24 beneficial to have a positive view of the integrity of
25 Horizon, if that be the case. So it wasn't completely

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1 one sided and lacking objectivity.

2 **Q.** We see at subparagraph (c), Ms Sewell explained that:

3 "... the first piece of work that Deloitte had been

4 asked to undertake was to give assurance that the

5 control framework, including the security and processes

6 for changes in the system, were robust from an IT

7 perspective."

8 Pausing there again, what Ms Sewell is describing

9 there, is she not, is an activity that is similar to

10 what had been carried out by Ernst & Young as part of

11 their financial audit but here perhaps with a particular

12 focus, a more direct focus, on the Horizon system?

13 Broadly speaking, they were covering the same areas,

14 that is to say the control framework, security and

15 processes for change; would you agree with that?

16 **A.** Broadly but I don't think that's the same as saying that

17 they were simply being asked to replicate what Ernst &

18 Young were doing.

19 **Q.** No, indeed. I didn't mean to imply that at all but

20 rather that the matters being canvassed by Deloitte

21 would cover an area that had already been

22 investigated --

23 **A.** Yes.

24 **Q.** -- by Ernst & Young, of which you were aware and which

25 had been reported to you?

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1 back in 2014, I think this would have been a surprise to

2 me that he was asking such a specific question of

3 Deloitte.

4 **Q.** Would you have understood that issue to relate to the

5 question of privileged access and whether or not

6 transactions could be inserted without a subpostmaster's

7 authority or approval?

8 **A.** I would now make that association. I don't think I did

9 at the time.

10 **Q.** Mr Aujard said:

11 "Assurance from Deloitte about the integrity of the

12 system records logs would be very valuable."

13 So clearly a hope and expectation that Deloitte will

14 ultimately give the Board the assurance that it's

15 seeking.

16 **A.** Yes.

17 **Q.** Now, a copy of the report was shared with you; is that

18 correct, at the time -- forgive me, after this meeting

19 in April, a copy of Deloitte's review was shared with

20 you?

21 **A.** I believe it was.

22 **Q.** Can we please just look at what you say in your

23 statement about your reaction to reading the report.

24 That's at WITN10000100, please, at page 34,

25 paragraph 108. Thank you. Now, I think you make the

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1 **A.** Correct.

2 **Q.** So it goes on at subparagraph (d) to confirm that Gareth

3 James, the partner at Deloitte -- so we know, forgive

4 me, by this stage, a draft report is in existence. So

5 some provisional findings, it seems, have been made at

6 this point:

7 "[Mr] James reported that all the work to date

8 showed that the system had strong areas of control and

9 that its testing and implementation were in line with

10 best practice."

11 However, he goes on to say:

12 "Work was still needed to assure the controls and

13 access at the Finance Service Centre."

14 Now, if we go on to (e) please:

15 "Chris Aujard [the General Counsel] explained that

16 several of the subpostmasters who were challenging

17 Horizon had made allegations about 'phantom'

18 transactions which were non-traceable."

19 What did you understand Mr Aujard to mean by

20 "phantom transactions"?

21 **A.** I don't think I had an understanding at that time of

22 what he meant. Rereading the documentation recently,

23 I've noticed, all the way back to the Rod Ismay report

24 there's a reference to allegations of ghost

25 transactions, which I had not previously picked up. But

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1 point that the copy that's been shared with you is

2 marked as a draft, dated 23 May 2014. You don't believe

3 you've been shown final versions --

4 **A.** Correct.

5 **Q.** -- or a final version of the report or of the briefing

6 document supporting it?

7 **A.** Correct.

8 **Q.** But you do say that, on receipt of the reports, this is

9 the fourth line from the bottom:

10 "... I can recall a sense of general disappointment

11 by the Board. I cannot recall my views at the time, but

12 looking at it now I think that Deloitte's report was far

13 too caveated and failed to reach any definitive

14 conclusions on the reliability of the Horizon IT

15 System."

16 Now, what I'd like to do, please, is look at the

17 report with you and some of the conclusions which it did

18 reach. Please could we bring up the report which bears

19 the reference POL00028062. Thank you.

20 Now, just to orientate ourselves a bit, please can

21 we turn to page 3, where we find the "Executive

22 Summary". This provides the outline of the "Context"

23 for the assurance work which Deloitte had undertaken.

24 It reads:

25 "As outlined to us by the Post Office Limited

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1 litigation team, 'POL is responding to allegations from
 2 subpostmasters that the "Horizon" IT System used to
 3 record transactions in POL branches is defective and
 4 that the processes associated with it are inadequate
 5 ([for example] that it may be the source and/or cause of
 6 branch losses). POL is committed to ensuring and
 7 demonstrating that the current Horizon system is robust
 8 and operates with integrity, within an appropriate
 9 control framework'."

10 It goes on to confirm:
 11 "POL is confident that Horizon and its associated
 12 control activities deliver a robust processing
 13 environment through three mechanisms: POL have designed
 14 features directly into Horizon to exert control; POL
 15 operates IT management over Horizon; and POL have
 16 implemented controls into and around the business
 17 processes making use of Horizon. Collectively these
 18 three approaches of inherent systems design, ongoing
 19 systems management and business process control are
 20 designed to deliver a Horizon processing environment
 21 which operates with integrity."
 22 A little further down, it confirms:
 23 "Deloitte has been appointed to:
 24 "[Firstly] consider whether this Assurance Work
 25 appropriately covers key risks relating to the integrity
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1 identified and -- please, if we could scroll down to
 2 subparagraph (4), thank you -- these relate to risks
 3 identified confirming system usage and, over the page,
 4 on page 31, we're starting first with subparagraph (e).
 5 This raises a point which we discussed this morning,
 6 Mr Day, of Mr Ismay's report. It provides:
 7 "Proactive monitoring of key System Usage Risks: The
 8 current assurance environment appears to be 'reactive'
 9 in nature, with exceptions in processing triggering
 10 diagnostic and remediation activity only when reported.
 11 It would appear that no use is being made of the Audit
 12 Store, for proactive monitoring of unusual or
 13 exceptional system events potentially worthy of further
 14 investigation and action."
 15 Now, bearing in mind what you'd repeatedly been told
 16 or reassured about the business's efforts to rectify and
 17 remedy any accounting shortfalls created by software
 18 faults, were you not concerned to read here that there
 19 was no proactive monitoring of events in the system,
 20 which could potentially cause such errors and
 21 shortfalls?
 22 **A.** I don't recall this specific finding. I have a better
 23 recollection, I think, of the short form report, which
 24 I believe came to the Board. I'm not sure this full
 25 56-page --
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1 of the processing environment;
 2 "to extract from the assurance work an initial
 3 schedule of the Horizon Features;
 4 "to raise questions for potential improvements in
 5 the assurance provision."
 6 Now, what I'd like to do, please, is move forward to
 7 the observations that were made in the report, the
 8 detail of which we can find at section 6 of the report,
 9 please, page 29. Now, we see here a section of the
 10 report entitled "Matters for Consideration":
 11 "In this section we set out our key matters for
 12 management consideration, further to the work we have
 13 performed above.
 14 "We have structured this section as follows:
 15 "[Firstly] Key matters for Consideration, by Risk
 16 Area ...
 17 "Factors to Consider in Formulating an Action Plan;
 18 and
 19 "Proposed Action Plan."
 20 Now -- thank you -- if we scroll down a little, we
 21 see the column on the left-hand side relating to "Risk
 22 Area", the column in the middle defining the "Key
 23 Matters for Consideration" and the column on the
 24 right-hand side, the "Nature of Assurance Work". Now
 25 on, page 30 please, this is the fourth area of risk
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1 **Q.** This is the assurance review, which I think you, in your
 2 evidence, say that you read.
 3 **A.** Okay.
 4 **Q.** Is that correct? Do you recall reading the report, the
 5 review?
 6 **A.** I will have read it. I don't recall this individual
 7 point or, indeed, relating it back to the earlier
 8 issues. I'm not exactly sure what the question is.
 9 **Q.** Forgive me, the point I'm making here is what Deloitte
 10 are flagging is a reactive approach being taken to the
 11 diagnosis and remediation of problems in the system, and
 12 that was consistent with what we saw, was it not, in
 13 Mr Ismay's report about the barcoding?
 14 **A.** Oh, I beg your pardon.
 15 **Q.** -- fault.
 16 **A.** I hadn't made that association but I can see why you're
 17 saying that now. Yes.
 18 **Q.** Now, you may not recall, or indeed you may not have read
 19 the next paragraph, but I would like to ask you about
 20 subparagraph (f), relating to hardware controls over the
 21 audit store. This reads:
 22 "The Centera EMC devices used to host Audit Store
 23 data have not been configured in the most secure EC+
 24 configuration. As a result, system administrators on
 25 these boxes may be able to process changes to the data
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1 stored within the Audit Store, if other alternative
2 software controls around digital seals, and key
3 management are not adequately segregated from Centera
4 box administration staff. Privileged access to the
5 cryptographic solution around digital signatures, and
6 publicly available formulas on MD5 hashed digital seals
7 would potentially allow privileged users at Fujitsu to
8 delete a legitimate sealed file, and [replace it] with
9 a 'fake' file in an undetectable manner."

10 Do you have any recollection of reading that at the
11 time?

12 **A.** I don't but I can quite see its significance now.

13 **Q.** If you had read it, do you think you would have made the
14 connection between this and the concerns which were
15 earlier articulated about access to the system?

16 **A.** I would like to think I would, although, as I say,
17 I will have received this report and read it, I do
18 recall colleagues saying that this was unwieldy and not
19 written in plain English and that was why I think Chris
20 Aujard was asked to ask Deloitte to write a shorter
21 form, easier to understand, report, which I believe was
22 then taken to the Board. And that one had some very
23 specific management actions coming out of it,
24 relating -- two particularly, one to do with balancing
25 transactions and one to do with integrity of the audit

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1 subparagraph (g) which references the branch database it
2 says this:

3 "We observed the following in relation to the branch
4 database being:

5 "[Firstly] A method for posting 'Balancing
6 Transactions' was observed from technical documentation
7 which allows for posting of additional transactions
8 centrally without the requirement for these transactions
9 to be accepted by subpostmasters ([either] as
10 'Transaction Acknowledgements' and [Transaction
11 Corrections] require). Whilst an audit trail is
12 asserted to be in place over these functions, evidence
13 of testing of these features is not available ..."

14 Did that not show, Mr Day, that there were backdoors
15 into Horizon?

16 **A.** I think, reading this recently, absolutely. It says
17 that. I didn't make any reference to it in my statement
18 and I had no recollection of this being a major alarm at
19 the time, and I don't know why that is. As I say, the
20 only documentation I've been provided with that helps me
21 to piece together what might have happened, although
22 it's not a direct recollection, is management actions
23 relating to the Deloitte report and I think it's a paper
24 by Chris Aujard entitled "Zebra Actions" or "Actions
25 relating to Zebra and the Deloitte report".

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1 store. But the point above it in (e), I don't recall --

2 I don't recall that one.

3 **Q.** What you seem to be suggesting, Mr Day, was this was far
4 too lengthy a report for you to consider in all its
5 detail but you, of course, were experienced in dealing
6 with lengthy reports. We had the management letter from
7 Ernst & Young with some detailed audit considerations.
8 Did you not treat this report in the same way as you
9 would --

10 **A.** Yeah, to be clear, it wasn't myself that said this was
11 unwieldy and unusable, although I might have concurred
12 with that view. I think it came from one of the other
13 people on the Board who said we need something easier to
14 understand, more concise and with a cover note, which
15 I believe was drafted by Mr Aujard. So I think the form
16 in which it came eventually to the Board, although there
17 is very little -- there appears to be very little
18 documentation relating to this period, I believe was
19 more like a six or eight-page document, much more
20 concise and, as I say, specified two areas that I recall
21 we then took management actions to address.

22 **Q.** Now, I fully take the point you make, which is that
23 subparagraph (f) is not phrased in language that would
24 necessarily be readily understandable to someone without
25 technical knowledge but, if we look, please, at

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1 And, having reread that, I can see that there are
2 two specific actions that IT -- the IT function took.
3 One was to test for the actual usage of these balancing
4 transactions, like had it ever actually happened, other
5 than the one incident in 2010 that had been referred to
6 by Deloitte; and the other was -- I forget the exact
7 wording -- to do with testing the integrity of audit
8 store access. And when I reread that document recently,
9 that sounded familiar, rather than anything that I'd
10 read in this original report.

11 So I think that was the distillation -- I think
12 there was a shorter form of this that may or may not
13 have been discussed at the Board. I couldn't find it in
14 any board minutes that it had been discussed but
15 presumably it must have been.

16 Then there were a series of management actions
17 coming out of the Chris Aujard paper, and then the trail
18 seems to go cold in the last few months that I was at
19 Post Office as to exactly whether those actions were
20 followed up and in what time scale.

21 **Q.** Thank you. I think, so far as you've covered, that's
22 your recollection of how the organisation responded --

23 **A.** Yes.

24 **Q.** -- to the Deloitte report but that's really the extent
25 of how you can help us in that regard; is that correct?

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1 **A.** Yes, I mean -- just to expand, I mean, unfortunately,
2 regrettably, I did not connect -- I don't recall
3 connecting at the time the balancing transaction point
4 to the earlier points. It may be -- may be self-evident
5 now but I think, had we as a Board had that presence of
6 mind to think "Oh, my goodness, privileged access,
7 wasn't that a problem in the past, even though it's been
8 remediated", I don't think we put those together.
9 Certainly, I didn't put those together.

10 **Q.** Thank you. There's one point I'd like to clarify with
11 you, please, in your statement. I'm just moving on from
12 the Deloitte report, this relates to a comment you make
13 in your statement about the advice which POL received
14 from Simon Clarke. That's at WITN10000100, please.
15 Page 27, please, paragraph 85. So you say here:

16 "I have been shown the following legal advice
17 provided to POL", and you list four pieces of legal
18 advice: Simon Clarke's Advice of 15 July 2013; his
19 advice of 2 August 2013; Brian Altman KC's Advice of
20 2 August 2013; and his further advice of 15 October
21 2013.

22 At paragraph 86, you say:

23 "I have no recollection of reading any of the
24 Advice. I do not recall any specific discussions by the
25 Board or briefings to the Board about any of the

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1 Questioned by SIR WYN WILLIAMS

2 **SIR WYN WILLIAMS:** Well, can I just ask, can we just go back
3 to paragraph 108 of the witness statement, so that I can
4 clarify in my own head what it means. It's page 34 of
5 WITN10000100. That's it.

6 Now, Mr Day, just so I can be clear, the document
7 that Ms Hodge took you to is the document you referred
8 to in the first sentence of paragraph 108, yes?

9 **A.** It is, yes.

10 **SIR WYN WILLIAMS:** Then you make reference in the latter
11 part of it to a second document and you give the
12 reference, and is that the briefing document which was
13 referred to as coming to you after the whole of the
14 report?

15 **A.** I believe it is sir, yes.

16 **SIR WYN WILLIAMS:** Right. Fine. Now, that paragraph reads
17 to me as if you are accepting that the Board actually
18 received both those documents and I want to be clear
19 that that's what you intend to say. If you just read it
20 quietly to yourself, and then ...

21 **A.** Yeah.

22 **SIR WYN WILLIAMS:** Forget the draft point for the moment,
23 whether they're the draft or final version, to me, your
24 paragraph reads as if the Board received both documents?

25 **A.** I think -- I can't be completely sure that the whole of

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1 Advice."

2 You then say at paragraph 87, this is what I wish to
3 clarify:

4 "I have been asked whether I had any prior knowledge
5 of the factual allegations set out in paragraphs 3 and 5
6 of the Simon Clarke Advice dated 2 August 2013. I did
7 not."

8 Now, those paragraphs relate to allegations that
9 evidence relating to known issues with Horizon had been
10 destroyed; is that correct?

11 **A.** Correct.

12 **Q.** When you say you had no prior knowledge, do you mean
13 prior to reading the Advice dated 2 August 2013?

14 **A.** I don't believe I read the Advice at all. I've only
15 read the Advice in the last few months.

16 **Q.** That's what I wanted to ask you, really. When did you
17 first read the Advice?

18 **A.** During the course of this Inquiry and, for whatever
19 reason, however strange it may seem, I did not read any
20 of those four advices and I'm as sure as I can be that
21 I didn't receive them.

22 **MS HODGE:** Thank you, Mr Day. I don't have any further
23 questions but if you could remain there, please, there
24 will be some questions from the legal representatives
25 and from the Chair, maybe.

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1 the Board received the full long document because
2 I can't recall who it was who said "This is not in
3 a form that is acceptable for the Board". It may have
4 been the Chair or somebody else, I don't think it was
5 myself. So it's possible, sir, that it didn't come in
6 its entirety to the full Board.

7 It would have come to some of the Board and been
8 rejected as not fit for purpose. I can't recall the --
9 I had thought that both documents had come to the Board
10 but the minutes don't help me to be sure on that point.
11 I'm --

12 **SIR WYN WILLIAMS:** So is the true state of your -- I don't
13 want to put words into your mouth. Are you saying this:
14 that the second document referred to in paragraph 108
15 ending 069 reference, that was presented to the Board,
16 so as far as you can remember, and, by "the Board", all
17 the persons who constitute the Board?

18 **A.** Precisely, sir, but I haven't seen the minutes which
19 prove that to be the case. But I --

20 **SIR WYN WILLIAMS:** No, but that's your understanding --

21 **A.** Yes, it is. It is.

22 **SIR WYN WILLIAMS:** Right. So far as the first document is
23 concerned, ending 062, your understanding is that some
24 members of the Board, including you, received that
25 document?

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1 A. Yes.

2 **SIR WYN WILLIAMS:** Fine. You go on to say in paragraph 108,
3 after identifying them:

4 "I can recall a sense of general disappointment by
5 the Board. I cannot recall my views at the time, but
6 looking at it now I think the Deloitte's report was far
7 too caveated and failed to reach any definitive
8 conclusions on the reliability of [Horizon]."

9 So am I to understand from that, that your personal
10 view is that the report which you received did not
11 demonstrate conclusively, or even on balance of
12 probability, that Horizon was robust because there were
13 no sufficient definitive conclusions about that?

14 A. Yes, that's true, sir.

15 **SIR WYN WILLIAMS:** Right.

16 A. To be clear, I think we're talking very much -- I'm
17 talking very much here about the shorter form report
18 with a cover note from Mr Aujard.

19 **SIR WYN WILLIAMS:** Right, okay. Again, sorry to cut across
20 you but so my thought processes are clear: so of the
21 document which you're satisfied from memory went to the
22 Board was a disappointment to the Board because it, in
23 effect, didn't reach definitive conclusions?

24 A. Correct. We felt we were two years on, no further
25 forward. We'd had a disappointing outcome in terms of

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1 A. Yes, that would follow.

2 **SIR WYN WILLIAMS:** Yes, and from memory, who would those
3 persons have been, Mr Day?

4 A. Well, it would have been the IT function, IT security,
5 the CIO, working in conjunction with the General
6 Counsel, who was custodian of this report but clearly
7 not an IT expert himself.

8 **SIR WYN WILLIAMS:** Right. So by name: Ms Sewell --

9 A. Yes.

10 **SIR WYN WILLIAMS:** -- and obviously Mr Aujard?

11 A. Yeah.

12 **SIR WYN WILLIAMS:** The most senior people, yes?

13 A. Yeah, another name appears in the documentation that
14 I was only reacquainted with very recently, a lady
15 called Julie George, who was, I think, IT security
16 person reporting in to Ms Sewell.

17 **SIR WYN WILLIAMS:** Fine. Thank you very much.
18 Right, who wants to ask further questions?

19 **MR HENRY:** Mr Stein and I would like to ask further
20 questions.

21 **SIR WYN WILLIAMS:** Have you agreed which one of you is going
22 first?

23 **MR HENRY:** I think Mr Stein has agreed that I should go
24 first, sir.

25 **SIR WYN WILLIAMS:** Right. Carry on then, Mr Henry.

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1 trying to verify the integrity of the Horizon system
2 from the Second Sight experience which had taken two
3 years. We'd then, albeit rather belatedly, realised
4 that we didn't have a truly objective report on Horizon
5 and this was our attempt to do that, and we find
6 ourselves three or four months later with a report which
7 essentially says the same things again: that the system
8 is broadly reliable but we haven't been able to test X,
9 Y or Z. We couldn't -- we didn't have documentation,
10 sufficient documentation going back far enough for us to
11 be able to fully test it.

12 By the time one had worked through the caveats, one
13 was not left with anything that, in my personal view,
14 took us any further forward.

15 **SIR WYN WILLIAMS:** Right. Then, finally, and then I'll hand
16 over. So far as what I'll call the long or the complete
17 version is concerned, the document ending 062, which
18 might be difficult for someone like me to understand,
19 ought not to have been difficult or unduly difficult to
20 understand for those members of the Post Office teams
21 who had the relevant technical expertise; is that fair?

22 A. That is fair.

23 **SIR WYN WILLIAMS:** Right. So will there have been persons
24 who received the full report who should have understood
25 what it was saying?

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Questioned by MR HENRY

1 **MR HENRY:** Good afternoon Mr Day?

2 A. Good afternoon.

3 Q. Could I ask you, please, to be shown a document
4 POL00333330, and this is an Audit and Risk Committee
5 document, 20 January 2014. You were in attendance
6 together with Ms Vennells, Ms Lyons and also Mr Aujard
7 was in the chair.

8 Can we go to page 5 of 79, please. We can see that
9 there is, 4.1, "Allegations relating to the integrity of
10 the Horizon system", Chris Aujard is described as being
11 the owner of this matter on the Executive Committee, and
12 it reads:

13 "There is a risk that allegations relating to the
14 integrity of the Horizon system, if not contained, could
15 raise wider questions over the robustness of our core
16 systems and our ability to operate, damaging (amongst
17 other matters) current partnerships, new areas of
18 expansion and public and government confidence."

19 Then there is reference to:

20 "Sparrow has established governance in place
21 including proactive risk and issue management, with
22 blockers to issue resolution escalated through to the
23 programme board. Risks, Assumptions, Issues and
24 Dependencies [RAID analysis] workshops are held monthly
25

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1 by the programme team and attended by the Risk Business
2 Partner."

3 Who was the Risk Business Partner?

4 **A.** I'm not completely sure but I think it may have been
5 David Mason.

6 **Q.** Who is he?

7 **A.** He worked in, I believe, the Internal Audit and Risk
8 Team. I think he's named on the first page of this
9 document.

10 **Q.** Thank you. So far as bow-tie status is concerned,
11 bow-tie was a sort of risk management tool, but it's
12 already determined to be an issue, so no bow-tie
13 document is being produced?

14 **A.** That's what it says here, yes.

15 **Q.** So that was January 2014. Now, the last annual reports
16 and financial statements that you signed, before you
17 resigned in January 2015, they were signed off by you
18 and Ms Vennells on 25 June 2014, and I want to take you
19 now to another document, which is POL00026716. You're
20 familiar with this because this is the annual report and
21 accounts, isn't it?

22 **A.** Yes.

23 **Q.** Yes. These are important documents, are they not? They
24 are required by statute?

25 **A.** Extremely important, yes.

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1 strategy. Withdrawal or lack of support from our staff
2 or subpostmasters, whether driven by concerns over
3 existing programmes and initiatives or historic cases,
4 could cause delays in the Post Office transformation
5 programmes and limit our ability to meet business
6 objectives."

7 If we then go into the next column, it talks about:

8 "Failure to comply with regulation could result in
9 fines, adverse outcomes for our customers and
10 significant damage to the Post Office brand."

11 That's under Regulatory & Compliance. Sorry, go up
12 to "Engagement risk":

13 "Lack of support from staff and subpostmasters would
14 jeopardise our ability to meet our strategic goals
15 [et cetera, et cetera] reduced reliance on government
16 subsidy."

17 Then the next column:

18 "We maintain a fluid and comprehensive engagement
19 programme with unions, staff and subpostmasters. These
20 include regular meetings with the National Federation of
21 SubPostmasters, the Communication Workers Union and
22 Unite senior management briefings to staff [et cetera,
23 et cetera]. We have a people plan aimed at addressing
24 staff motivation and skill needs. This includes
25 development of new leadership and reward frameworks and

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1 **Q.** Extremely important and, obviously, you want to give
2 a true and fair view, an accurate view, of the business,
3 don't you?

4 **A.** Correct.

5 **Q.** Right. Well, we know from the document that I initially
6 took you to, the ARC document from January 2014, that
7 there was concern about risks which could -- relating to
8 the integrity of the Horizon system -- raise wider
9 questions over the robustness of core systems,
10 et cetera, et cetera?

11 **A.** Yes.

12 **Q.** Now, I just want to ask you to go to one extract of this
13 document. Could we go, please, to page 42 of 116. Can
14 you see there "Engagement risk", and beneath "Engagement
15 risk" -- and if we could just scroll up very, very
16 briefly -- we've got "Regulatory & compliance", but
17 I want to concentrate on "Engagement risk". The only
18 reference, I suggest, to the risk identified in the ARC
19 meeting six months before, the risk, in other words
20 quotation, that "allegations relating to the integrity
21 of Horizon, et cetera, et cetera" is this as follows,
22 and it reads:

23 "The support of our staff and subpostmasters and
24 engagement with them during this significant time of
25 change is key to the successful delivery of our

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1 increased focus of recruitment and training. We have
2 created a Branch Support Programme and planned further
3 initiatives."

4 If I were to suggest to you that engagement risk,
5 those three columns, reading from left to right, are
6 very carefully worded and delphic, what would you say?

7 **A.** Well, the first thing I would say, in terms of my duties
8 as a CFO and responsible for the annual report and
9 accounts, is that, at no stage, did we seek to diminish
10 or cover up the ongoing concerns that there were around
11 Horizon, if that's what you're alluding to. But this
12 would not be the point in the report and accounts to
13 make reference. The auditors would -- were kept abreast
14 at all times of the findings of the Second Sight review.
15 They reviewed the possibility at all times for
16 contingent liabilities and/or provisions that would need
17 to be made so --

18 **Q.** Really?

19 **A.** Yeah. So my focus would very much on I need to disclose
20 as much as possible to the auditors so that they can
21 make a qualified judgement on whether they need to
22 recommend creating a contingent liability or
23 a provision. So that would be the hard technical answer
24 to the question, rather than, you know, I wouldn't seek
25 to bury it in this text here.

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1 Q. Okay. I mean, before we move on, you say, you know,
 2 that the auditors were kept fully informed about
 3 provisions for liabilities; you recall that?
 4 A. Absolutely. We had a conversation each year. I mean,
 5 it's part of -- it's part of the sign-off process.
 6 You're asked a very direct question about your knowledge
 7 of fraud, your knowledge of anything anomalous, any
 8 ongoing potential legal issues across the business, and
 9 I think you'll see from the report and accounts each
 10 year a progression of statements from the audit partner
 11 starting back in, I think, 2011/12 where mention is made
 12 of allegations about the Horizon system, through to
 13 20 -- my last year 2013/14, where there's a much longer
 14 statement, which talks about discussions with
 15 management, which talks about ongoing investigations.
 16 At this point we do not recommend, or management,
 17 rather, do not feel it's appropriate to put a contingent
 18 reliable in place and we concur with this you, but we
 19 will continue to monitor it.
 20 So, from my perspective, my duty of care was to make
 21 sure that the auditors had all the information such that
 22 all of this could be divulged in the accounts at the
 23 appropriate place.

24 Q. But you've just said, and you said that you distinctly
 25 recall that, you know, the auditors were being made

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1 "As expected they asked about the impact on the
 2 accounts and I have assured him that we believe there is
 3 no impact."

4 That was the consistent message: no impact, no
 5 provision needs to be made.

6 A. That was management's view but EY, of course, would
 7 exercise complete independent thought and evaluate, and
 8 that would have been referred from the senior
 9 management -- the Senior Manager to the partner. They
 10 would not simply accept our assertion that there's
 11 nothing to put in the accounts.

12 Q. But the fact is, and I return -- we don't need to put it
 13 back up on screen -- when I was asking about delphic,
 14 there's no mention in the ARA that you signed off in
 15 June 2014 of the risk of historic miscarriages of
 16 justice, is there?

17 A. I didn't see any, no.

18 Q. No, there isn't. There's no mention of impending civil
 19 litigation or the risk of impending civil litigation
 20 either. The JFSA aren't even mentioned once.

21 Mr Day, this really was going into ultra defensive
 22 mode, wasn't it? It was trying to contain, keep the lid
 23 on the problems with Horizon integrity, wasn't it?

24 A. I don't believe it was. I mean, the 2013 accounts, bear
 25 in mind, would have been signed almost exactly

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1 aware of provisions for liabilities and, presumably,
 2 that would also be, of course, the impact of any
 3 integrity issues on Horizon?

4 A. Well, the two were interrelated, clearly.

5 Q. Of course. Could we go, please, to POL00099203. Yes,
 6 thank you so much. So this from Ms Vennells to Sarah
 7 Hall, and you know who Sarah Hall was, don't you?

8 A. Yes.

9 Q. Who was she?

10 A. Financial Controller, who reported to me.

11 Q. The Financial Controller. Goes to all of the big names:
 12 Alwen Lyons, Mark Davies, you, of course, Ms Crichton.
 13 Can we go to page 3, and page 3, there is a reference
 14 to:

15 "... the Senior Manager confirmed that they agree
 16 with our view that there should be no provision", about
 17 the Horizon report.

18 I wonder if we can locate that on the page. Yes.
 19 Do you see that?

20 "... the Senior Manager confirmed that they agree
 21 with our view that there should be no provision."

22 That was in the context of the Horizon report.

23 A. Correct.

24 Q. Do you see that? Also, at page 4, if we could go to
 25 page 4, that we have:

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1 simultaneous with the Second Sight Report and, bear in
 2 mind, that was an Interim Report, there was still a lot
 3 more work to be done, and the key finding was that there
 4 were no systemic issues with the system found at that
 5 point in time.

6 So I'm absolutely confident that what we said in the
 7 2012/13 accounts was completely justifiable. I'm
 8 slightly less clear on the '13/'14 points but I'm
 9 recalling that the Mediation Scheme was still running,
 10 albeit it was at a much higher level of claims and
 11 compensation claims at that point. So I think you may
 12 have a stronger point for the '13/'14 accounts, but
 13 I can't remember the exact wording of what was said
 14 about the contingent reliability there.

15 But the only other thing I would say is that the
 16 experience of the organisation at that time, I accept we
 17 know differently now, was that we'd been through this
 18 relatively difficult period of not strong enough IT
 19 controls, we'd come through that, we'd successfully
 20 closed all the doors, admittedly, in retrospect, I wish
 21 we'd looked back at what might have happened before we
 22 closed those doors. But that was the context for
 23 feeling that we were making progress forwards and that,
 24 albeit the Mediation Scheme was much bigger and had
 25 taken much longer to complete than we originally

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1 envisaged, we were getting towards the end of the
 2 process. That was the context of the feeling in the
 3 middle of 2014.

4 **Q.** Forgive me but wasn't the mediation process a sham?
 5 **A.** No, I don't think so at all.

6 **Q.** Anyway, let's go to POL00021525 and this, as we can see,
 7 is minutes of a Board meeting held on 21 May 2014. So
 8 just tying this in with the answer you gave to my last
 9 question, the Board must be feeling more confident now,
 10 they think they're making progress, et cetera,
 11 et cetera; do you agree?
 12 **A.** Yes, this will have been before the accounts were
 13 finalised but, yes.

14 **Q.** So why is it, then, that the Board is allergic and
 15 hypersensitive to the inclusion of Project Sparrow in
 16 the report and the determination that it should be
 17 excluded?
 18 **A.** Sorry, from which report? From the report and accounts?
 19 **Q.** Yes. I want to take you, please, now to page 6 of 14,
 20 which will give you context for this. 6 of 14 at letter
 21 (f). So "Annual Report and Accounts", letter (f):
 22 "The Board discussed the inclusion of Sparrow in the
 23 report and agreed that it should be excluded. However,
 24 the business agreed that it would be appropriate to
 25 include a paragraph in the CEO overview to explain the
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1 transformation, that all got lost in the wash, didn't
 2 it?
 3 **A.** I admit, it looks slightly unusual in that, by this
 4 stage, it was a material financial risk, but there is
 5 a context that the other major transformations that were
 6 going on, the Network Transformation Programme, the IT
 7 Transformation Programme, by this stage, there was even
 8 a third one, which was called a Business Transformation
 9 Programme which was about taking huge amounts of cost
 10 out at the centre, I think this is an attempt to try to
 11 put together all of these big ongoing financial costs
 12 and risks, but I accept that, at face value, it looks
 13 slightly odd to lump Sparrow in with those.

14 **Q.** It's all part of sleight of hand, "*léger de main*", isn't
 15 it. It's to put the best possible gloss on the
 16 situation without actually revealing the unvarnished
 17 truth?
 18 **A.** No, not my recollection at all.

19 **Q.** I'm going to have to deal with matters shortly now
 20 because there's a technical problem with uploading
 21 certain of the documents but I want to put to you the
 22 straight contradiction. We've seen documents that
 23 suggest that the Board were concerned about their
 24 personal liability in relation to this, and you were of
 25 course tasked with dealing with the insurance position
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1 size of the enterprise risk and the major transformation
 2 programmes being undertaken, referring back to the risks
 3 already highlighted in the CFO report.

4 "Action: Mark Davies."
 5 Mr Davies, your comms man, why is he being given
 6 this responsibility in connection with the annual report
 7 and accounts, in relation to Project Sparrow, which is
 8 dealing with the risks of Horizon litigation, both civil
 9 and criminal?
 10 **A.** Well, firstly, he would be responsible for drafting all
 11 of the elements of the annual report and accounts that
 12 weren't my direct responsibility. So the financial
 13 statements would be my responsibility and the rest of it
 14 would be, initially, Mark Davies' responsibility,
 15 reporting in to the Chair and Chief Exec. I can't
 16 answer why Sparrow at this point was seen to be more in
 17 the, I guess, discursive part of the report and accounts
 18 and, therefore, included within the CEO overview, but
 19 the only thing I can think is that, as I mentioned
 20 before, because we hadn't -- or the auditors had decided
 21 not to put in a financial contingent liability or
 22 provision, it was seen as more of a general risk, than
 23 a specific financial risk.

24 **Q.** Can you help, but the paragraph in the CEO overview to
 25 explain the size of the enterprise risk and the major
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1 both in respect of professional indemnity and Directors'
 2 and Officers' insurance?
 3 **A.** Correct.

4 **Q.** Right. Disclosure to the insurer was made but there was
 5 no reference to this in the annual reports and accounts.
 6 Can you explain why that was?
 7 **A.** I'm not sure why you would expect there to be.

8 **Q.** Well, if it was a matter of such importance -- and not
 9 necessarily the act of reporting to the insurer but the
 10 matter upon which your duty, as you saw it, arose that
 11 you had a duty to inform your insurers -- why wasn't
 12 that matter given greater prominence, which is, of
 13 course, the potential existence of bugs, errors and
 14 defects and also the conduct of Mr Gareth Jenkins?
 15 **SIR WYN WILLIAMS:** Well, I don't think he can answer the
 16 latter part of that question unless you are challenging
 17 his evidence that he had no idea of the Clarke Advice.

18 **MR HENRY:** I do have a document that might be relevant to
 19 that, sir.

20 **SIR WYN WILLIAMS:** Right.

21 **MR HENRY:** I am anxious, I don't want to be unfair to you,
 22 Mr Day, but, I mean, do you see the -- we'll go to the
 23 documents straightaway but do you see what I'm getting
 24 at? If it's so important that you have to notify your
 25 insurers, why isn't the risk that necessitated that
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1 disclosure to your insurers properly reflected in the
 2 ARA?
 3 **A.** Yes, I understand the point. I don't know. I don't
 4 equate the two. It was a -- it was good governance to
 5 inform the broker, you've seen the list of emails
 6 around -- I think it was unfortunate phrase "not scaring
 7 the horses", there was a concern that if you didn't
 8 inform the broker in -- as soon as you were aware of
 9 a possible reliability: (a) you might not be covered;
 10 (b) you might suffer much higher premia in the future.
 11 Although it clearly was a material risk, I don't
 12 think the fact of needing to report it to our broker had
 13 a bearing on what I would show in the annual report and
 14 accounts.
 15 **MR HENRY:** Right.
 16 Mr Day, thank you. May I just mention something to
 17 you, sir?
 18 **SIR WYN WILLIAMS:** Yes.
 19 **MR HENRY:** I was hoping to take it without going to the
 20 documents, which are yet to be uploaded but I think in
 21 fairness, because I'm not going to be suggesting to this
 22 witness that he is lying but that he may have forgotten
 23 something, and --
 24 **SIR WYN WILLIAMS:** Just a second, Mr Henry.
 25 Could the document on screen come down so I can see
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1 BBC, you were then working as acting Chief Financial
 2 Officer; is that right?
 3 **A.** Not the last period of time but an interim period in
 4 2008.
 5 **Q.** Right. So you had some experience of that and then you
 6 joined the Post Office and, essentially, your duties as
 7 Chief Financial Officer remained the same for your
 8 three-year period; is that right?
 9 **A.** Correct.
 10 **Q.** I think you described those duties within your
 11 statement -- paragraph 16, sir, for your note --
 12 day-to-day, you say this: that you were responsible for
 13 financial accounting, management and statutory
 14 reporting, budgeting, financial planning -- forgive me
 15 for shortening this, but you go on, essentially, to say
 16 all aspects of financial matters within the Post Office;
 17 do you agree?
 18 **A.** Correct.
 19 **Q.** Right, okay.
 20 Now, a couple of weeks ago I asked a number of
 21 questions of Mr Cameron that related to the way that
 22 shortfalls were dealt with within branch accounts; okay?
 23 **A.** Yeah.
 24 **Q.** Now, those questions were about the issue which was
 25 where the Horizon system would identify, correctly or
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1 Mr Henry clearly. Thank you. That's better.
 2 Yes, sorry, Mr Henry.
 3 **MR HENRY:** I'm so sorry to trouble you with this, sir, but
 4 unfortunately there are three documents which can only
 5 be uploaded if we have a short break and --
 6 **SIR WYN WILLIAMS:** Well, it is -- how long are you going to
 7 be, Mr Stein?
 8 **MR STEIN:** Sir, I think in the region of 12 to 15 minutes.
 9 **SIR WYN WILLIAMS:** Let's have our 12 to 15 minutes of
 10 Mr Stein, if you don't mind, Mr Henry, then the
 11 documents can be uploaded in the short break, and then
 12 you can conclude. How about that?
 13 **MR HENRY:** I'm very grateful to you, sir. Thank you so
 14 much.
 15 **SIR WYN WILLIAMS:** Fine. Over to you, Mr Stein.
 16 **Questioned by MR STEIN**
 17 **MR STEIN:** Thank you, sir.
 18 Mr Day, I've a series of questions which relate to
 19 the way that financial matters were dealt with within
 20 the Post Office, which hopefully you'll be able to help
 21 with. You came to the Post Office from the BBC where
 22 you worked as Group Financial Controller for what, six
 23 years --
 24 **A.** Yes.
 25 **Q.** -- BBC, yeah? Then, for the last period of time at the
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1 incorrectly, that there was a shortfall within a branch
 2 account, how that was accounted for within the Post
 3 Office systems, okay? All right.
 4 So let's try and -- and stop me when I go wrong with
 5 this, okay? So let's try and work out what actually
 6 happened. Branches, as you are aware from the history
 7 of this matter, would be told by the Horizon system that
 8 there's a shortfall on occasions and the branch manager
 9 and staff were then encouraged -- I use that as
 10 a neutral expression -- to then pay to cover the
 11 shortfall; you're aware of that?
 12 **A.** Well, via a transaction correction.
 13 **Q.** Right. Well, let's start right at the beginning. Do
 14 you agree that, on occasions, the Horizon system would
 15 suggest there's a shortfall, in other words that the
 16 branch needed to pay a sum of money to correct, to
 17 balance, the system?
 18 **A.** If there was a discrepancy between the cash that had
 19 been paid in, for example, and the amount that had been
 20 put into the -- input into the system and that that
 21 didn't correspond with the client's understanding of the
 22 transaction, that could happen.
 23 **Q.** Right. Well, Mr Day, you must have been following this
 24 matter because it's been part of the Inquiry now and,
 25 indeed, history of this for quite some time
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1 subpostmasters; being confronted with a suggested
 2 shortfall in their accounts; you must be aware of that?
 3 **A.** That's a possibility. I understand that, yes.
 4 **Q.** What do you mean a possibility? Many, many
 5 subpostmasters say it actually happened. It's not just
 6 a possibility, Mr Day.
 7 **A.** Yes, but I -- yes, okay.
 8 **Q.** Okay.
 9 **A.** Yeah.
 10 **Q.** So we've got that as our starting point. Now, the
 11 technical bits that I need your help on our these: we
 12 know from Mr Cameron's evidence that that situation,
 13 that the debit amount, the shortfall amount, that debit
 14 was held as an amount owed by the postmaster; do you
 15 agree with his evidence on that?
 16 **A.** Yes.
 17 **Q.** Right. Now, next bit. Do you agree to hold a debit
 18 against a subpostmaster would require a credit to be
 19 posted to the POL Post Office financial accounts?
 20 **A.** Not necessarily.
 21 **Q.** Right. Why not?
 22 **A.** Because, as I understood it, mismatches would be
 23 investigated. They wouldn't automatically put through
 24 as a debit to the postmaster and a credit to the Post
 25 Office. It wouldn't work that way. The two sides of

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1 prove that -- through evidence, that it was not their
 2 fault. I think that's very unfortunate.
 3 **Q.** Unfortunate may be a slight understatement; do you
 4 agree?
 5 **A.** I do.
 6 **Q.** Right. Okay. So in the situation that we've just
 7 described, I've used Mrs O'Dell as my example, she's
 8 being told there's a shortfall for X sum of money, she's
 9 got to pay up, okay? Now, in that crude situation,
 10 which was real for her and existed for many
 11 subpostmasters and mistresses, do you agree that that
 12 would mean that there was a debit against the
 13 subpostmaster/mistress's branch and that that would
 14 require a credit to be posted within the Post Office
 15 financial accounts, in other words to make the balance?
 16 It's a double entry bookkeeping system --
 17 **A.** I get the -- double entry. I think the -- I don't think
 18 it's as final as that. I think it would have been in
 19 the suspense account for the Post Office pending
 20 resolution, pending investigation. And, again, my view,
 21 my direct experience of suspense accounts would have
 22 been very much from the top down materiality. I accept
 23 that I wouldn't have had visibility of sums which could
 24 be material to individual subpostmasters.
 25 **Q.** Right, okay. Well, let's just put aside suspense

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1 the transaction would be -- attempt to be married up,
 2 where they didn't marry up completely, they would be
 3 investigated. That would either result in a transaction
 4 correction, transaction adjustment, which the
 5 subpostmaster would have full visibility of, or it -- in
 6 far more cases, as I understand it and understood it,
 7 far more cases, there would be a credit balance in the
 8 suspense account, which would result from the client
 9 company having demanded less of a -- having expected
 10 less from a transaction than the subpostmaster had input
 11 at their end, ie the vast majority of credit balances
 12 would relate to discrepancies between Post Office at the
 13 centre and clients, rather than subpostmasters.
 14 But I don't discount the possibility, clearly, that
 15 a balance could exist there from a subpostmaster.
 16 **Q.** Right. You are aware of the evidence from
 17 subpostmasters, Mrs O'Dell provided a good example. On
 18 checking the records of the helpline, she was being told
 19 that there's a shortfall. She said, "It's not my fault,
 20 nothing to do with me, I don't know what's going wrong",
 21 she said that repeatedly and she was told basically "Pay
 22 up, it's your duty". Are you aware of such evidence as
 23 that?
 24 **A.** I'm aware of such evidence. I actually think it's
 25 regrettable that the onus was on the subpostmaster to

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1 accounts for a moment because we went through that with
 2 Mr Cameron, who described them as a red herring, okay?
 3 So let's just go with our crude example, all right? So
 4 what I'm after is this: we know that on occasions
 5 subpostmasters were confronted with shortfalls. Those
 6 shortfalls weren't identified to any individual
 7 transaction such as stamps. They were just told:
 8 there's money owing to Horizon, okay? Just stay with
 9 that for a moment.
 10 Money was then paid in by a branch manager or
 11 mistress or employee at the branch and that money went
 12 into the accounts. You're with me so far?
 13 **A.** Yes.
 14 **Q.** Right. Now, the bank underwriting Post Office was the
 15 Bank of Ireland, correct?
 16 **A.** Yes.
 17 **Q.** Right. So the actual money paid in through either
 18 a cash injection into the system or digital transaction,
 19 actually went to the Bank of Ireland; do you agree?
 20 **A.** I'm not sure about that.
 21 **Q.** Eventually, it would go to the Bank of Ireland. Surely?
 22 They're the bank that underwrites it. I'd be surprised
 23 if they went anywhere else.
 24 **A.** Okay.
 25 **Q.** Well, Mr --

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1 A. No, that wasn't my recollection but --
 2 Q. Where did it go? Did it go into bonuses? What happened
 3 to it?
 4 A. You may be right.
 5 Q. Well, quite.
 6 A. But I come back to the point, which is, it wouldn't
 7 automatically -- I think I know where you're going with
 8 this and it isn't as simple as debit the subpostmaster
 9 for an account that they don't -- for an amount that
 10 they don't actually owe, credit central Post Office.
 11 There would have been a fundamental mismatch in the --
 12 in some part of the transaction that would need to have
 13 been investigated.
 14 Q. Right. Sorry, Mr Day --
 15 A. And that's why I come back to suspense accounts because
 16 that's the only place it would go pending final
 17 accounting determination of treatment. It doesn't
 18 automatically go into either the Bank of Ireland or the
 19 Post Office's back pocket. That's not the way it would
 20 work. It would be an unreconciled item that would be
 21 investigated. And what I've shared with you is
 22 unfortunately, I was not close enough to seeing those
 23 individual balances, which I absolutely now understand
 24 were material for individual subpostmasters.
 25 My view of suspense accounts was "Tell me, Financial
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1 things didn't happen, and you're aware of the High Court
 2 judgment, you're aware that this went to the Criminal
 3 Court of Appeal, where there have been findings
 4 consistently that what I've described actually happened
 5 to a lot of subpostmasters. Do you reject all of that?
 6 A. No.
 7 Q. Right, okay. Now, what we're trying to find out is what
 8 happened to subpostmasters' money. Where did it go
 9 through the accounting systems? Do I get, from your
 10 evidence, that you don't really know? You cannot tell
 11 me that it went into a specific account or part of the
 12 accounts with a specific name to it; is that what you're
 13 trying to tell me?
 14 A. I'm not saying I don't know, I'm saying it would have
 15 gone into a suspense account. It wouldn't have
 16 automatically gone into the consolidated Post Office
 17 Accounts. So it would have required reconciliation,
 18 investigation.
 19 Q. You're saying lots of "would have", you don't understand
 20 though the detail of what actually happened or not.
 21 That's down to Mr Ismay's team --
 22 A. Well, I --
 23 Q. Okay --
 24 A. I'm piecing together what I now understand from other
 25 people's evidence and from documentation that, at the
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1 Controller, or Ernst & Young, if there's anything
 2 material that I need to be aware of", and that's not
 3 just size; that's anomalies, that's things which have
 4 been there for too long and haven't been resolved. And
 5 that would have been my check and balance that things
 6 were working correctly.
 7 Now on a smaller scale, the team in Chesterfield,
 8 Rod Ismay's team, would have been routinely, every day,
 9 every week, reconciling all of the individual
 10 transactions which would throw up exceptions that they
 11 would investigate and, in the vast majority of cases,
 12 would either write off the balance or process
 13 a transaction correction which a subpostmaster would
 14 then have the ability to accept or reject. And, just to
 15 repeat myself, my regret is that it's clear -- and
 16 I think it came up in somebody else's evidence -- that
 17 the onus unfortunately was it was asymmetric, it was
 18 very much on the subpostmaster to prove that they had
 19 not made a mistake and I think that's regrettable.
 20 Q. Or another way of looking at that, Mr Day, is that the
 21 only choice they really had was to accept, in other
 22 words, accept that they owed the money, when they may
 23 well not have done, if it's a Horizon error/defect?
 24 A. Well, I would hope that wasn't the case.
 25 Q. Mr Day, you seem to be referring to this as though these
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1 time, because I had no reason to be that close to it,
 2 I would not have known.
 3 Q. Right. Let's try it really crudely. There's a debit on
 4 the system for a branch, through an alleged shortfall.
 5 Yes? You're saying there's some sort of system Mr Ismay
 6 is operating it with his team at a micro level that
 7 should be looking into this. Lots of questions about
 8 that, that's not your part of the system, okay? Right.
 9 Now where within the accounts, you saying, are you, the
 10 suspense accounts again? Are you saying there's
 11 a suspense accounts with debit, the alleged shortfall,
 12 somewhere being referenced within it? Are you saying
 13 that?
 14 A. That's the only conclusion I can reach.
 15 Q. So you don't know the answer to the question? You're
 16 saying this is your best guess; is that right?
 17 A. Yes.
 18 Q. All right, well, I think I've taken that about as far as
 19 I can.
 20 Can I then deal with one other matter. Mr Cameron
 21 referred to the fact that if a postmaster had not paid
 22 up within about 60 days what the Post Office considered
 23 a debt, then it was written off to the profit and loss
 24 account; is that right or is that wrong?
 25 A. I don't recollect. I don't recollect the time period.
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1 Q. Right. Well, that's what he said. If such time period
2 had existed, would you have expected there to be
3 a policy, a rule or procedure, which set out the 60-day
4 write-off policy?

5 A. Yes, I expect there would have been a policy. I don't
6 know who in the organisation would have been responsible
7 for making those decisions. It may have been Rod
8 Ismay's team in Chesterfield. Had it been a larger
9 amount, it might have been escalated to the Financial
10 Controller in London, possibly even to myself.

11 Q. Right, bringing all these things together, so you're
12 suggesting Chesterfield, Mr Ismay's team dealing with
13 these matters, looking at corrections, looking at
14 investigating matters, all of these things you supposed
15 happened, all of that to transactional system going on
16 within the Post Office Accounts, was that the subject of
17 reporting back up to you as the Chief Financial Officer?
18 In other words, were you cited on the comings and goings
19 of these transactions, what's happening, or not:
20 a report an update, something?

21 A. Only by exception.

22 Q. Only by exception: just briefly explain that?

23 A. Only by exception in terms of something which could not
24 be resolved between my Financial Accounting Team in
25 London and Rod Ismay's Finance Service Centre, and

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1 (2.45 pm)

2 (A short break)

3 (3.00 pm)

4 MS HODGE: Welcome back, sir, can you see and hear me?

5 SIR WYN WILLIAMS: Yes, thank you, yes.

6 MS HODGE: Sir, we have some further questions from Mr Henry
7 who will be followed by Mr Moloney --

8 SIR WYN WILLIAMS: Yes.

9 MS HODGE: -- just to alert you to the fact that Mr Moloney
10 will also be asking some questions. I think we have
11 resolved the issues in relation to documents, so I'll
12 hand you over to Mr Henry.

13 SIR WYN WILLIAMS: Right, Mr Henry.

14 Further questioned by MR HENRY

15 MR HENRY: Thank you, sir, and thank you to my learned
16 friend, Ms Hodge, I'm very grateful.
17 Mr Day, you remember the July 2013 Board, don't you?

18 A. 16 July, yes.

19 Q. You have a recollection of that. The Board were
20 concerned about claims for wrongful prosecution, weren't
21 they?

22 A. It appears so from the minutes, yes.

23 Q. Do you have an independent recollection of that or are
24 you just now going on the papers?

25 A. I don't have an independent recollection. I'm going on

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1 I don't recall -- that may have happened a very small
2 number of times.

3 Q. So what you mean by exception is something they regarded
4 as exceptional might then be kicked upstairs for you
5 to --

6 A. Yeah, and that could either be by size but it would be
7 very unusual for something very material, sizewise, to
8 not be -- to not have a clear genesis and resolution.
9 Perhaps more likely would be I might be asked to write
10 off things which had been hanging around for too long.

11 Q. At the time when you were in your three years as the
12 Chief Financial Officer at Post Office, were you aware
13 that, as you and I have discussed, the onus was being
14 put on subpostmasters to pay up in the way that you and
15 I have discussed?

16 A. No, I regret I wasn't aware of that.

17 Q. When did you become aware?

18 A. Through this Inquiry.

19 MR STEIN: Thank you, Mr Day.

20 SIR WYN WILLIAMS: Right. We'll now have a short break
21 of -- well, let's say 3.00 so that, if there are any
22 difficulties with uploading the documents, we have a bit
23 of time to do it, and then Mr Henry can ask his
24 questions on the newly uploaded documents. All right?

25 MS HODGE: Thank you, sir.

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1 the papers and I've pieced together other papers that
2 I've seen more recently.

3 Q. I see. Can I ask for this to be put on the screen very
4 briefly -- you're not copied in to it but you're
5 referred to in it -- it's POL00164253. Thank you so
6 much. If we could just blow it up a little bit. Yes.
7 This is from Belinda Crowe/Cortes-Martin to Rodric
8 Williams, Mr Singh, Charles Colquhoun and Chris Aujard:
9 "I now have the actual action from the Board.
10 Copying Charles as he will need to assist with this, and
11 also get signed off through Chris Day."
12 That's to do with insurance, isn't it?

13 A. I believe it is, yes.

14 Q. Yes. The subject is, however, "Enquiry re: Current
15 Prosecutions", and then the following, in bold:
16 "The Board asked for a note from the General Counsel
17 explaining who was named in past prosecutions and the
18 liability for the Business and individual Board members.
19 The note should also include information on both
20 [professional indemnity] and D&O insurance cover."
21 Can you just help us, please: "who was named in past
22 prosecutions"; was that, as it were, the Board saying
23 that they wanted to have a list of everybody who'd been
24 prosecuted?

25 A. Well, I note, first of all, this is five months later.

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1 This is December 2013.

2 **Q.** Yes.

3 **A.** So I don't understand the direct link from the -- that
4 you made to the 16 July 2013 Board. A lot of things
5 will have happened between those two dates.

6 **Q.** So --

7 **A.** Sorry, and I don't understand, at first glance, why
8 they're asking about specifically named people in
9 prosecutions but I have to believe that things had moved
10 on a long way since that 16 July Board meeting.

11 **Q.** I see. I mean, who was named, I mean, that could be,
12 for example, a list of who had been prosecuted, could it
13 not?

14 **A.** Possibly.

15 **Q.** It could be, of course, who was on the hook for
16 liability although that is dealt with separately, and
17 the liability for the business and individual board
18 members.

19 **A.** Could it not also refer to Post Office versus Royal Mail
20 Group?

21 **Q.** Exactly. Could be that as well. But I want to just ask
22 you please to consider this: if you were going to advise
23 the Board and take ownership of notification and
24 reporting on this very, very important issue, you ought
25 to have been apprised of all of the relevant facts,

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1 saying it didn't happen but I don't recall any
2 subsequent updates to our brokers or insurers.

3 **Q.** But I'm asking you as to whether you ought to have been,
4 not whether you were or not, but whether you accept
5 that, in order to advise the Board properly as to risk
6 and also to fulfil your obligations because they had
7 been delegated and deputed to you, so far as
8 notification to your insurers, you ought to have been
9 apprised of all material risks?

10 **A.** Possibly, but I, on reading this, I see that it splits
11 between a legal view and an insurance view. I accept
12 that the two are interrelated.

13 **Q.** Did you notify RMG's insurers?

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

15 **Q.** You did. Okay. Let's move on, then, please, to
16 POL00021991. This is an email from a Mr Andrew Parsons.
17 Did you ever come across Mr Parsons?

18 **A.** I've only known the name through the Inquiry.

19 **Q.** Only through the Inquiry. So POL00021991, and David
20 Oliver to a number of people, including Belinda
21 Cortes-Martin and could we scroll up, please. It's
22 12 March 2014 and, if we concentrate on number 3,
23 "Insurances risks note":

24 "This note had the dual purpose of advising the
25 board (its contents were later reflected in a board

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1 ought you not?

2 **A.** As it relates to potential insurance claims, absolutely.

3 **Q.** That, of course, would include the issue raised by the
4 Clarke Advice, if not the Clarke Advice itself, but
5 certainly the issue raised within it, namely the fatally
6 undermined credibility of a witness who had acted as
7 an expert for the Post Office in prosecutions and had
8 brought the Post Office's duties into disrepute.

9 I'm very grateful for some clarification. It should
10 be "in whose name was past prosecutions brought". So
11 I think, therefore, it is a toss-up between RMG and POL.
12 So ignore what I was exploring with you about a list of
13 potential defendants; it looks as if the email -- and
14 I'm very grateful for this to be drawn to our attention
15 on behalf of Ms Vennells -- but it looks to be the
16 question in whose name the prosecution was brought.

17 But leaving that aside, do you accept that you ought
18 to have been properly advised about Mr Gareth Jenkins'
19 position, in order to properly advise the Board as to
20 risk and also to give proper and full notification to
21 the insurers?

22 **A.** I haven't considered that. To the best of my knowledge,
23 the only time I or my team were involved in liaising
24 with the insurers was directly after the receipt of the
25 Second Sight Report, in July 2013. I don't -- I'm not

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1 paper) and acting as notification to [the Post Office's]
2 insurers -- hence why this doesn't look like
3 a traditional piece of legal advice."

4 Now, I want to show you that document now, the one
5 that is referred to as an "insurances risk note" because
6 of the dual purpose and the fact that it states that its
7 contents were later reflected in a board paper so could
8 we go, please, to POL00021996, please.

9 What I'm going to suggest to you is that, on the
10 presumption that this did go before the Board in one
11 form or other, as indicated by Mr Parsons, then you
12 would have been apprised of the problem with Mr Jenkins.
13 Could we go, please, to -- you can see it's called
14 Horizon Risks. Could we go to page 2, please, and there
15 we see, "Risks to Post Office: Prosecutions &
16 Convictions", and this, of course, would be materially
17 important and of interest to the Board, would it not?

18 **A.** Yes, if it went to the Board, yes.

19 **Q.** Yes. I omit the first paragraph but I concentrate on
20 the second:

21 "In particular, the expert evidence of one Post
22 Office witness, Dr Gareth Jenkins of Fujitsu, may have
23 failed to disclose certain historic problems in the
24 Horizon system. Under the criminal prosecution
25 guidelines, Post Office has an obligation to disclose

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1 (even retrospectively) this previously undisclosed
2 information to subpostmasters' defence counsel. Post
3 Office is required to make these retrospective
4 disclosures where the additional information
5 (ie Dr Jenkins' knowledge of historic, but now resolved,
6 problems with Horizon) may have undermined a prosecution
7 case or assisted with an accused's defence."

8 "Civil Risks" is then mentioned:

9 "Although the law firm Shoosmiths threatened to
10 bring a group action against the Post Office for
11 problems in the Horizon system, this did not
12 materialise."

13 I omit words:

14 "Nothing has been heard from Shoosmiths in the last
15 12 months. However, it is understood that Shoosmiths
16 has around 120 subpostmasters on a register of possible
17 claimants, though as yet no further attempts at
18 litigation have been threatened."

19 "Criminal/Civil crossover claims", can we go up,
20 please. You agree that all of this is highly relevant
21 for the Board's consideration, isn't it?

22 **A.** Absolutely.

23 **Q.** Yes. Could we just scroll up, please, further, "D&O
24 Risks", "At a meeting with senior representatives of
25 [Justice for Subpostmasters Alliance]", again, reference

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1 Inquiry, I didn't even know the name of the expert
2 witness.

3 **Q.** So can I just help you, who else was dealing with
4 insurance, apart from you, where -- was Alasdair
5 Marnoch, one of the Non-Executive Directors, also
6 dealing with it?

7 **A.** I think I may be able to help there. I think there is
8 a reference in the document, just going back in time,
9 you'll recall my somewhat unimpressive attempts to
10 address the various NEDs' questions about insurance.
11 I think when you get to about March 2014 -- I think I've
12 got the date right -- there's a request -- it clearly
13 goes to the legal -- the Legal Team to look at it and
14 I think, at that point -- I'm not saying it was taken
15 out of my hands but I think it took on a completely
16 different dimension.

17 Now, I'm just speculating now but that's the last
18 document which I saw relating to insurance.

19 **Q.** Now, you mention there that it appeared to have been
20 taken out of your hands. You mentioned earlier in your
21 evidence when you were being asked questions by Counsel
22 to the Inquiry, Ms Hodge, that, in respect of the
23 Deloitte matter, you felt that the audit trail, so far
24 as things that you had wanted instigated, had gone cold.
25 Do you feel a concern now that there may have been, as

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1 to a potential claim against directors of the Post
2 Office; do you see that?

3 **A.** Yeah.

4 **Q.** Then scrolling up, please, "Summary":

5 "Post Office is in a highly contentious situation
6 and therefore finds itself open to litigation from
7 a number of different sources. It is also quite
8 possible that Post Office's directors and officers may
9 find themselves caught up in this litigation, even
10 though at present a claim against an officer or director
11 would not appear to have any merit."

12 It is dated 15 August 2013.

13 I mean, isn't that clear now, sir, that you must
14 have been apprised of the Gareth Jenkins issue?

15 **A.** I have no recollection of that. I've no recollection of
16 this document, and I'd like to see where it was
17 discussed in the Board minutes.

18 **Q.** Certainly, it has been referred to by Mr Parsons as
19 having been submitted to the Board or for the Board's
20 purpose, the dual purpose, and then formed the basis of
21 a paper to the Board but this doesn't jog your memory at
22 all?

23 **A.** Absolutely not. I would be as sure as I can be that
24 I've not seen this document before. I did not
25 commission it. I would go further and say until this

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1 it were, an inner or an outer circle and that certain
2 members of the Board would not have been apprised of
3 this risk?

4 **A.** No, I'm not saying that.

5 **Q.** You're not saying that? So you're not saying that this
6 was being kept from you?

7 **A.** Well, there's a separate point around legal advice,
8 generally, which is I think we're all -- you've seen
9 other people's evidence to the effect we don't
10 understand why we weren't given the advice, sometimes
11 didn't know it existed. I didn't approve budgets to
12 sign off what looks to have been quite expensive pieces
13 of legal advice. That's a general point.

14 On this specific, I would be very surprised if this
15 had come to the Board in this form, because I -- it
16 would certainly have been familiar to me if it had.

17 **Q.** Well, if not you, then who is responsible for managing
18 this issue?

19 **A.** Well, it can only be a small group of people who were
20 clearly taking this forward, which was Mr Aujard and
21 Ms Crowe. I don't know who else they were working in
22 concert with but I'm as sure as I can be that this
23 advice did not come in this form to the Board. I stand
24 to be corrected if you can find a minute.

25 **Q.** This is before Mr Aujard arrives because it's dated

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1 15 August?

2 **A.** I beg your pardon, Ms Crichton.

3 **Q.** But, I mean, Ms Crowe wouldn't act of her own volition
4 on something of this importance. I mean, who at a Board
5 level is going to be accountable and take ownership for
6 this? Because, obviously, if the board was apprised of
7 Mr Jenkins' alleged misfeasance or wrongdoing, then
8 a number of things flow but I'm only going to
9 concentrate, for this purpose, on the ARA, that ought to
10 have gone into the annual report and accounts, a matter
11 of that gravity.

12 **SIR WYN WILLIAMS:** Well, I think, Mr Henry -- I don't want
13 to stop you, because this is quite an important
14 document, but we have had evidence from Ms Crowe, as she
15 was, and I don't believe this document was put to her.
16 I'm not criticising anybody because I'm rather assuming
17 it's a document that has surfaced comparatively
18 recently, although I may be wrong about that.

19 We've also got Ms Perkins coming tomorrow and we
20 have Mr Parsons coming next week or the week after.
21 Now, on the basis that we accept, for these purposes,
22 that what Mr Day is saying is accurate, that he
23 personally had not seen this document at all, so far as
24 he can remember, I think this line of questioning should
25 be put much more pertinently to Ms Perkins and/or

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1 **MR BLAKE:** No, we think this is the first time. I can say
2 for certain that I know that it is in Rule 10 requests
3 for witnesses in the coming weeks.

4 **SIR WYN WILLIAMS:** Right. Fine. Then I think I will allow
5 you to accept my steer, Mr Henry.

6 **MR HENRY:** Thank you, sir.

7 **SIR WYN WILLIAMS:** Mr Moloney.

8 **Questioned by MR MOLONEY**

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

10 Mr Day, I just want to ask you about the 2014
11 Deloitte report, if I may.

12 With the Deloitte report, Post Office wanted to get
13 to the bottom of any questions around the integrity of
14 the Horizon system; is that right?

15 **A.** Correct.

16 **Q.** Yeah, and I think you said that the Board was
17 disappointed with the Deloitte report because it didn't
18 seem to take things much further forward than things
19 that had been before it?

20 **A.** Correct.

21 **Q.** We now know that the Deloitte report showed that audit
22 data could be deleted and replaced in an undetectable
23 manner. Inevitably, Post Office had to deal internally
24 with the implications of the Deloitte report.

25 **A.** Yes.

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1 Mr Parsons and, for that matter, even though she's
2 already given evidence, Ms Crowe.

3 **MR HENRY:** Well, thank you, sir. I'm sorry for the
4 oversight, so far as Ms Crowe.

5 **SIR WYN WILLIAMS:** No, no, I'm not blaming anybody. I'm
6 just saying these things happen in an inquiry and
7 I think -- I may be wrong -- but it's the first time
8 I've seen this document in public in this Inquiry for
9 certain.

10 **MR HENRY:** Well, I will take your steer, sir, and I will ask
11 Mr Day no further questions.

12 **SIR WYN WILLIAMS:** Fine. Just before we -- in case I am
13 wrong about that, I won't ask Ms Hodge because she's
14 only recently returned but I think Mr Blake is still
15 there.

16 Is my understanding about this correct, Mr Blake?

17 **MR BLAKE:** Yes, sir, although in terms of how long we've had
18 this document for, I can't assist with that.

19 **SIR WYN WILLIAMS:** No, but am I right in thinking that it
20 hasn't surfaced, so far as you can recall, in any
21 questioning of witnesses to date?

22 **MR BLAKE:** I think that's correct.

23 **SIR WYN WILLIAMS:** Does anybody in the room -- I'm now
24 inviting anybody to contradict me, if they think that
25 I've got that wrong and we have seen it before.

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1 **Q.** You've mentioned to the Chair, I think it was just
2 before the break, about the name of Julie George has
3 come to your attention recently and you think that she
4 might have been in charge of security around IT?

5 **A.** Yes, that's a document I've seen only very recently and
6 also in others' evidence.

7 **Q.** Might I take you to that document --

8 **A.** Yes.

9 **Q.** -- which is reviewed and signed off by Julie George and
10 it's POL00031409. That's POL00031409 and, as you say,
11 it's been brought up before, which is the Zebra Action
12 Summary. We can see that this is dated 12 June 2014,
13 and the Deloitte report was, I think, either 23 or
14 24 May, it was late May, in any event, wasn't it. We
15 see that the authors here are James Rees and Emma McGinn
16 and this is signed off by Julie George. If we go to
17 page 2 of this report please under "Introduction", we
18 can see that:

19 "This document is in response to the Zebra review
20 and highlights specific areas regarding the Horizon
21 solution, outlined in Deloitte's report, which suggested
22 controls Post Office could implement to mitigate the
23 areas the project highlighted."

24 So it is, it's about essentially internally
25 actioning what Deloitte identified in the report.

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1 If we go to page 6, please, we see 4.2.2, under
2 remediation items, which start at paragraph 4, 4.2.2,
3 which is "Data Logging", and reads that:

4 "One point raised in the report was that it was
5 possible for someone with privileged access to delete
6 data from specific areas-off Horizon. This is always
7 a risk with individuals using admin or power user
8 accounts and is a persistent risk, one that needs to be
9 catered for in almost any organisation.

10 "Due to the sensitive nature of the information
11 contained in the databases, monitoring of those
12 databases should be put in place using technology to
13 detect and record deletions and administrative changes
14 to the databases. If possible, alerts should also be
15 generated for mass deletions and high level risk changes
16 to database [schemes]."

17 The "Recommended remediation" was:

18 "The solution currently in place may be able to
19 undertake the level of logging required within the
20 Horizon solution. It is recommended that the current
21 logging and logs are reviewed on a daily basis.

22 "This needs to be investigated further and the
23 options on how to handle this defined through the risk
24 management process and based on the solutions already in
25 place or ones that could be procured to handle this."

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1 "Clearly there is no blame attached anywhere [it
2 continues] and this morning's meeting with Chris Day,
3 Chris Aujard, Lesley and Malcolm -- focused on what we
4 would need to put in place as an organisation to address
5 overall assurance on all critical systems, starting with
6 Horizon from 1 April."

7 So it is plain that at that morning there'd been
8 a meeting between you, Julie George, Chris Aujard,
9 Lesley Sewell and Malcolm; in that context, would that
10 be Malcolm Zack?

11 **A.** Head of Internal Audit.

12 **Q.** Head of?

13 **A.** Internal audit.

14 **Q.** Thank you. So there's been that meeting that morning,
15 but are you saying that you didn't see the Zebra Action
16 Summary at that meeting?

17 **A.** I am as sure as I can be that I hadn't seen the Zebra
18 Action Summary but what I do think I was familiar with
19 was a different paper which was authored by Chris
20 Aujard, which was actions -- Zebra actions arising from
21 Deloitte's findings would -- I spoke about it this
22 morning and, having read the documentation recently, the
23 key points on that related to testing whether balancing
24 transactions had, in fact, ever taken place beyond the
25 one that was specified in 2010 and, secondly, something

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1 So this section of the report explains that there
2 are no controls over this, absolute controls over this,
3 and Post Office will need to do daily checks in order to
4 make sure there had been no, as it were, phantom
5 transactions or deletions, and so on. This is about
6 deletion of data by people with sufficiently privileged
7 access, here.

8 Did you see the report at or about the time of its
9 creation, Mr Day; can you remember?

10 **A.** I saw this document for the first time last week.

11 **Q.** I see. May I take you, please, to an email that Julie
12 George sent, and I think you saw this email --

13 **A.** Yes.

14 **Q.** -- and if I could ask you about this, which is
15 POL00346958. That's POL00346958.

16 This is from Julie George on 17 June 2014, it's to
17 Rod Ismay, David Mason, Malcolm Zack and Gina Gould and
18 it attaches the Zebra Action Summary Version 3, which we
19 looked at just now, and it reads:

20 "Hello all,

21 "I have tried to call you Rod [Rod Ismay, obviously,
22 in this context] -- attached a Draft Summary of actions
23 arising from Deloitte's recent piece of work on the
24 Horizon systems [confirming that it's a Zebra Action
25 Summary, to all intents and purposes]."

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1 around the audit store integrity of testing around the
2 audit store.

3 Those were the two things which sprang to mind.

4 This email I saw recently, and it did jog a memory
5 because I think I probably only met Julie George once,
6 and so when I saw this, yeah, I had a vague recollection
7 of a meeting, so that suggested that we did
8 congregate -- the key people who were capable of taking
9 forward the management actions coming from Deloitte, did
10 meet and do something -- initiate a series of actions.

11 What's missing is what on earth happened afterwards
12 with any of those actions.

13 **Q.** Quite, and can I come back to what on earth happened in
14 a moment and just perhaps test your memory slightly, if
15 I may, as to whether or not you might have seen this
16 report but also ask you, first of all, about the
17 additional document drafted by Mr Aujard. Do you have
18 a clear recollection of this document, that, as it were
19 distilled aspects of the Deloitte report?

20 **A.** I don't have a recollection at the time. I -- that's
21 a document which I think I received in my Rule 9 bundle.

22 **Q.** Okay.

23 **A.** So I have become familiar with it.

24 **Q.** Yeah.

25 **A.** But, as I say, it's conspicuous along with this email as

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1 being the only documents that we have to substantiate
 2 what happened post-Deloitte. I don't know where the
 3 Deloitte review itself went, I don't know where the
 4 instruction with Deloitte went. It's -- unfortunately
 5 I don't recall anything and I have no documentation.
 6 **Q.** Just to test your memory, if I may, to see how sure you
 7 are about not seeing this document, obviously this email
 8 from Julie George circulates the Zebra Action Summary
 9 and speaks of how she has tried that day to call Rod,
 10 Rod Ismay, and then, in the following paragraph, says
 11 that:
 12 "Clearly there is no blame attached anywhere, and
 13 this morning's meeting with Chris Day, Chris Aujard,
 14 Lesley and Malcolm -- focused on what we would need to
 15 put in place as an organisation to address overall
 16 assurance on all critical systems, starting with Horizon
 17 from 1 April."
 18 Would you not think that, if you were having that
 19 meeting and you were Chief Financial Officer, Mr Day,
 20 Chris Aujard, General Counsel, Lesley Sewell, CIO --
 21 Chief Information Officer -- and Malcolm Zack, Head of
 22 Internal Audit, with Julie George, who was the Head of
 23 IT Security, so far as you can recollect, that if this
 24 document was available and been circulated just later
 25 that day, to these people who appeared to be members of

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1 **A.** Sorry, just to say it would be rather strange for all
 2 these people to meet and just pore over a document.
 3 I think it would be much more likely to be a discursive
 4 meeting around the broad findings of Deloitte at that
 5 point and the actions that are going to be taken, and
 6 I think I've seen elsewhere, possibly Ms Sewell's
 7 evidence, that a series of actions were undertaken for
 8 which she took functional responsibility but with the
 9 aim of delivering them by the end of the financial year,
 10 31 March 2015. That's -- when I saw her evidence, that
 11 felt familiar but that's all, really.
 12 **Q.** Yeah. Just to round it off, then, essentially, so far
 13 as you're concerned, from hereon in, then, as you told
 14 the Chair, responsibility for actioning what was
 15 necessary passed to Lesley Sewell, Chris Aujard and
 16 Julie George, so far as you were concerned?
 17 **A.** Yes, to be precise, it would be functionally Lesley
 18 Sewell but Chris Aujard was taking responsibility, as
 19 you saw, throughout the whole Project Zebra, of pulling
 20 the whole thing together. So it would be principally
 21 those two, and I'm less clear on exactly what Julie
 22 George's role was. I think she'd only just joined the
 23 organisation. As I say, I think this was almost
 24 certainly the one and only time I met her, so I'm not
 25 sure how involved she was in taking the actions forward

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1 ExCo, would it not surprise you if that document had not
 2 been dealt with in your meeting that morning?
 3 **A.** Not necessarily, no.
 4 **Q.** Right.
 5 **A.** I mean, I have only the vaguest memory of the meeting.
 6 I imagine it was quite a difficult meeting. I can see
 7 from the people who were there, that it would have been
 8 a serious meeting, which is what are we going to do
 9 about this but I do not recall us going through that
 10 document. And just the style and the font and the
 11 addressees of that document, I'm sure I'd recognise it
 12 if I'd seen it before.
 13 **Q.** Right. So can I take this from it: that you had
 14 a meeting that morning which focused on what you would
 15 need to put in place as an organisation to address
 16 overall assurance on all the critical systems, starting
 17 from 1 April, but you think that this document was
 18 not -- you're sure that this document was not, as it
 19 were, produced to you in that meeting?
 20 **A.** Yes, because the -- as sure as I can be. The other
 21 document that I've referred to, the Chris Aujard paper,
 22 when I read it, felt much more familiar. So it's
 23 possible that that was a document we reviewed or that we
 24 didn't review any document.
 25 **Q.** Then just, finally --

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1 but, primarily, it would be Lesley and the IT Team and
 2 Chris Aujard and the Legal Team.
 3 **MR MOLONEY:** Thank you very much, Mr Day. That's all I ask.
 4 **SIR WYN WILLIAMS:** Thank you very much.
 5 Is that it, Ms Hodge? No.
 6 **MS HODGE:** Two matters, please. Firstly, I believe that
 7 Mr Day may wish to say something. Is there anything you
 8 wish to say, Mr Day, which hasn't already been covered
 9 in --
 10 **A.** Well, it seems rather late now but I would like to say
 11 that I am extremely sorry for the devastating impact the
 12 Horizon scandal has had on so many subpostmasters and
 13 their families and it's extremely regrettable.
 14 **MS HODGE:** Thank you, Mr Day.
 15 Sir, there's one final matter I think Mr Blake would
 16 like to raise.
 17 **SIR WYN WILLIAMS:** Yes.
 18 **MR BLAKE:** Thank you, sir. I can assist a little further on
 19 the Bond Dickinson document. It exists on our systems
 20 with a different URN as well, that's POL00193585 and it
 21 was a document, in fact, that I took Alwen Lyons to --
 22 **SIR WYN WILLIAMS:** Right.
 23 **MR BLAKE:** -- and the question was whether she recalled the
 24 document and she didn't recall that particular document.
 25 **SIR WYN WILLIAMS:** So it has surfaced but only to be the

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1 subject of non-evidence, if I can put it in that way?
 2 **MR BLAKE:** Exactly, 21 May 2024.
 3 **SIR WYN WILLIAMS:** Thank you very much, Mr Blake. Thank
 4 you.
 5 Right. Well, Mr Day, thank you very much for making
 6 a witness statement and for appearing today. I'm
 7 grateful to you for your participation in the Inquiry.
 8 So we will adjourn now and resume at 9.45 tomorrow
 9 when I believe Ms Perkins is due to give evidence.
 10 **MS HODGE:** Yes, sir. Thank you.
 11 **SIR WYN WILLIAMS:** Thank you very much, everybody.
 12 (3.36 pm)
 13 (The hearing adjourned until 9.45 am the following day)

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