

Friday 28 June 2024

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 2 (9.45 am)
 3 **GARETH IDRIS JENKINS (continued)**
 4 **MR BEER:** Good morning, sir, can you see and hear us?
 5 **SIR WYN WILLIAMS:** No, I can't hear you actually. I can see
 6 you fine but I can't hear you.
 7 **MR BEER:** Can you hear me now, sir? I'll try once more.
 8 Can you hear me now, sir? *(Pause)*
 9 Can you hear us now, sir?
 10 **SIR WYN WILLIAMS:** I can.
 11 **MR BEER:** Thank you very much, sir.
 12 This morning's questioning is going to begin with
 13 questions from Ms Page.
 14 **SIR WYN WILLIAMS:** Thank you very much.
 15 **Questioned by MS PAGE**
 16 **MS PAGE:** Do you remember going into the witness box in
 17 Guildford Crown Court on 14 October 2010?
 18 **A.** Yes, I do.
 19 **Q.** Seema Misra was in the dock, she sits beside me now. Do
 20 you recognise her?
 21 **A.** Yes, I do.
 22 **Q.** The judge will have been on the bench, yes?
 23 **A.** Yes.
 24 **Q.** The jury will have been opposite you, looking straight
 25 at you. Did you know that the reason that the jury are

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1 the day job, wasn't it?
 2 **A.** Yes, it was.
 3 **Q.** It will have felt --
 4 **A.** Sorry, yes, it was.
 5 **Q.** I'm so sorry. It will have felt very different. It
 6 will have felt probably, I would imagine, quite
 7 extraordinary to be there in the witness box with
 8 Mrs Misra in the dock, knowing that her fate would turn
 9 on what you said. Did it feel extraordinary?
 10 **A.** It certainly felt different from normal, yes.
 11 **Q.** Did you know that the trial was also a test for Horizon?
 12 **A.** I'm not sure whether I did or not.
 13 **Q.** By then, Horizon was an out-of-control monster, hundreds
 14 of innocent people had already had their lives ruined to
 15 protect it, but you don't accept that, do you?
 16 **A.** I was not aware of that at the time, no.
 17 **Q.** You told us yesterday, "As far as I was aware, all the
 18 bugs had been fixed. That was my true belief at the
 19 time and still is", and you confirmed that you rejected
 20 the findings of the Horizon Issues judgment.
 21 **A.** Yes, and I still stand by that.
 22 **Q.** Isn't the truth that you knew that Horizon was a monster
 23 and that it was causing harm?
 24 **A.** No, that was not how I felt.
 25 **Q.** You hid it, didn't you?

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1 positioned in that way is so that they have the very
 2 best view of the witness, so that they can see and hear
 3 the witness in the best way?
 4 **A.** I wasn't aware that that was why the court was arranged
 5 that way, no.
 6 **Q.** It's arranged that way because it was for them to weigh
 7 up your evidence, wasn't it, the truth of what you were
 8 saying?
 9 **A.** I was aware that that was what they were trying to do,
 10 yes.
 11 **Q.** Do you remember taking the oath? Because that was the
 12 moment after which you were bound to tell the truth, the
 13 whole truth and nothing but the truth?
 14 **A.** Yes, I remember that.
 15 **Q.** Was it just like the day job, just like supporting
 16 another ticket?
 17 **A.** No, it wasn't. It was a very different experience from
 18 what I was normally doing.
 19 **Q.** Because you said earlier this week that you approached
 20 giving evidence in the same way, and that's why you just
 21 confined yourself to the narrow answers to the narrow
 22 questions that you were asked; do you remember saying
 23 that?
 24 **A.** I remember saying that, yes.
 25 **Q.** But, actually, you acknowledge it was very different to

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1 **A.** No, I did not.
 2 **Q.** You answered a lot of questions yesterday about the
 3 Misra trial which were effectively aimed at
 4 understanding why you didn't tell the jury about the
 5 monster, and you answered most of them with variations
 6 of "I realise that now", "I should have done that,
 7 I realise that now".
 8 You had to say that, didn't you?
 9 **A.** That's the truth. That's why I said it.
 10 **Q.** In fact, you knew what you were doing. You threw mud in
 11 the jury's eyes, didn't you?
 12 **A.** I did not.
 13 **Q.** Well, Mr Jenkins, in the 1931 film of Frankenstein, the
 14 monster is an assemblage of body parts from various
 15 corpses and they're brought to live by stitching and
 16 bolting them together. I'm going to go through some of
 17 the body parts that were stitched into Horizon and see
 18 what you accept and what you don't accept.
 19 So let's start, please, with cash accounts. If
 20 I could ask, please, for EXPG0000001. It's Professor
 21 Charles Cipione's expert report prepared for this
 22 Inquiry.
 23 Can we go to page 118, please. What I'm going to
 24 take you to is his conclusions about his analysis of
 25 some 57,000 PEAKs, PinICLs and KELs. Now, if we go to

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1 17.1.3 please, and I'll start a little way in, where it
 2 says that AI376 -- end of the first line:
 3 "AI376 (Accounting Integrity) caught my attention.
 4 Accounting integrity is a fundamental requirement of the
 5 LHITS [that's one his acronym for the Horizon system].
 6 AI376 was one of the final AIs to be closed."
 7 That's Acceptance Incidents, yes?
 8 **A.** Yes.
 9 **Q.** At 17.1.6, if we go down a little, it says:
 10 "In January 2000, ICL Pathway states 'If pressed
 11 POCL [Post Office] would agree that AIs 342, 372, 376,
 12 378, 218, 391 are closed/incapable of further update.
 13 Their Acceptance Manager is leaving [blah, blah, blah].
 14 Further in the same report it states that 'The outturn
 15 AI376 was 0.06% Cash Account Discrepancies, exactly
 16 an order of magnitude better than the target ...'"
 17 Now, did you know that AI376 was ultimately resolved
 18 by an agreement that a small number of cash account
 19 discrepancies would, in fact, be acceptable?
 20 **A.** I don't know that I knew that at the time, I do know
 21 that now.
 22 **Q.** A bit further down, 17.1.9, Professor Cipione says this:
 23 "Regardless, the fact that accounting integrity was
 24 a persistent issue in the national rollout of the
 25 [Horizon system] cannot have been the intention of the
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1 please a little to paragraph 2.1, you're named here. It
 2 says:
 3 "Last week's activities:
 4 "As part of the Acceptance discussions Pathway has
 5 documented a plan to incorporate carry out
 6 reconciliation processing in the TIP interface:
 7 (documented by John Pope and Gareth Jenkins) ..."
 8 **A.** Yes.
 9 **Q.** "Pathway is not committed to producing a tool to
 10 re-input lost transactions (though I expect it to remain
 11 on the agenda -- Acceptance Incident 376)."
 12 The same one we've just been talking about. So you
 13 may not have been centrally involved but you must have
 14 known, Mr Jenkins, that AI376 was an Acceptance Incident
 15 about cash accounts?
 16 **A.** I was aware there were Acceptance Incidents, I'm not
 17 sure that I was that aware of the details but I was
 18 aware that there was some work required in terms of
 19 adding further reconciliation into the system.
 20 **Q.** All right. Well, we can take that down. So you don't
 21 accept that you knew that cash accounts were
 22 a persistent problem through the rollout. Am I right?
 23 **A.** I was aware that there were a number of problems but
 24 I wasn't involved in the detail of the problems that
 25 were actually occurring. My role at that point was with
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1 sponsors nor the goal of ICL Pathway."
 2 Do you accept that?
 3 **A.** I'm not sure I quite understand what that means.
 4 **Q.** What that means is that accounting integrity was
 5 absolutely fundamental to an accounting system and the
 6 fact that he saw, through this analysis, that it was
 7 a persistent issue in the national rollout, he says,
 8 well, that just can't have been the intention of those
 9 who were designing or commissioning the system.
 10 **A.** I think it was the intention that there was accounting
 11 integrity in the system.
 12 **Q.** But it wasn't the intention that that would continue to
 13 be a problem holding up acceptance, was it?
 14 **A.** I wasn't involved in the acceptance area and I wasn't
 15 involved in the accounting side of things, at that time.
 16 **Q.** Is that right? Because I could take you to
 17 a document -- and I will if I need to -- which refers to
 18 resolving AI376. It's a progress report by a fellow
 19 called Roger Donato from August 1999. Do you know Roger
 20 Donato?
 21 **A.** Yes.
 22 **Q.** It says there -- shall I bring it up for you? If we
 23 could go, please, to FUJ00079162. We see at the top it
 24 says it's a progress report and we can see it's prepared
 25 by Roger Donato, dated 20 August 1999, and if we go down
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1 the agent's side of things.
 2 **Q.** Can we go back, please, to Professor Cipione's report,
 3 I'm sorry to have had to take it down. EXPG0000001. If
 4 we could go, please, to page 135. That figure, in the
 5 middle of the page, is his review of the PEAKs, PinICLs
 6 and KELs, and it's those that he's picked out where
 7 there is a bug causing receipts and payments mismatches,
 8 so in other words cash account problems. Do you see on
 9 the right, "Development Code" was the cause of
 10 33 per cent of them? Then we've also got various other
 11 causes to do with development: low-level design,
 12 development reference data, et cetera.
 13 If we go a bit further down at 18.1.19, please, just
 14 there:
 15 "Based on this data I make the following
 16 observation:
 17 "A significant proportion of these [PEAKs and
 18 PinICLs, that's his abbreviation] had defect causes that
 19 were recognised as being related to the design or
 20 development of [the Horizon system] (45%). This
 21 indicates to me that there were acknowledged bugs,
 22 errors or defects in [the Horizon system] that were
 23 capable of giving rise to a payment and receipt
 24 imbalances."
 25 Do you accept what he says there?
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1 A. I think this is referring to the very early days during
 2 the rollout of Legacy Horizon.
 3 Q. Well, it's over number of years and they were mostly
 4 from the relatively early years but they go into the
 5 early 2000s, so we're not talking just about rollout,
 6 we're talking about going into the early 2000s here?
 7 A. I think rollout didn't complete until about 2002.
 8 Q. Well, we can find out the exact dates on that if you
 9 like, but what we'll do, if I may, is ask you this: do
 10 you accept that, in those early years of Horizon when
 11 people were being prosecuted, a significant proportion
 12 of the PEAKs and PinICLs which related to accounting
 13 problems were down to the design and the coding of
 14 Horizon?
 15 A. I accept that is what Professor Cipione found out.
 16 I wasn't involved at that time and wasn't aware that
 17 people were being prosecuted at that time.
 18 Q. If we go a little bit further down, please, at 18.2.4,
 19 he says this about his review of the documents:
 20 "... I make the following general observations:
 21 "Many of these [PEAKs and PinICLs and KELs] seem to
 22 have been raised as a result of internal
 23 reconciliations."
 24 So that was your area, wasn't it, the
 25 reconciliations?

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1 sometimes, despite my very best efforts, I just can't
 2 get to the bottom of these accounting problems, and
 3 I just have to close the ticket without a resolution".
 4 Did none of them ever say that to you in these informal
 5 chats?
 6 A. I can't remember that sort of discussion, no.
 7 Q. Did none of them ever say to you, "When I am stuck,
 8 I just have to inject transactions into the branch
 9 accounts to sort the problem out. Needs must. I know
 10 it's not ideal. I haven't really got to the bottom of
 11 the problem but at least the branch can balance and
 12 I can move on to all the other tickets waiting in my
 13 stack".
 14 Did any of them ever say something like that to you
 15 in those informal chats?
 16 A. I don't think it would be quite in that way. It would
 17 be a case of, when there was a problem, you would need
 18 to make some adjustment to address the fact that that
 19 problem would happen, but you would then need to
 20 actually go and fix the underlying root cause of the
 21 problem. A good example of that is what we were talking
 22 about a day or two ago, in terms of the receipts and
 23 payments mismatch. Not only did we have to actually fix
 24 the root cause of the problem, but we -- but then
 25 changes did need to be made to actually take into

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1 A. No, my area was to do with the harvesting of the
 2 transactions that had been generated as part of the
 3 reconciliation.
 4 Q. "There does appear to be an earnest effort, on the part
 5 of SSC, to investigate these issues, identify a root
 6 cause, and mitigate future recurrences.
 7 "The tickets show that different teams were involved
 8 when investigating these issues.
 9 "In the majority of these [PEAKs and PinICLs], it is
 10 not evident that the identified fight issue was
 11 resolved.
 12 "In a majority of these [PEAKs and PinICLs] the root
 13 cause is related to [the Horizon system]."
 14 So the issues were not always resolved, Mr Jenkins.
 15 A. I believe --
 16 Q. You believe they were, you say?
 17 A. I believe they were by the time I got involved with the
 18 counter system a few years later.
 19 Q. You told us, when all these issues had been resolved,
 20 all issues had always resolved, that was based on
 21 informal chats, yes?
 22 A. Yes.
 23 Q. But if you chatted to any of the people involved in
 24 these PEAKs and PinICLs and if they'd been honest with
 25 you, they'd have said, "Well, you know, Gareth,

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1 account the impact that it had had on the branches.
 2 Q. The point is, Professor Cipione tells us that they
 3 couldn't always find the root cause of the problem,
 4 Mr Jenkins, and they would just close the ticket anyway.
 5 A. I understand that that is what he says in his report but
 6 his report was only on the very early days of the
 7 problem. I think things improved after that point.
 8 Q. All right, well, let's just think about that and when it
 9 might have improved and what we'll do is move to what
 10 I call body part number 2, which is remote access.
 11 Mr Beer asked you some questions about Mr Roll's
 12 evidence on this subject but I don't think that he read
 13 out a section of it, which was Mr Roll's explanation for
 14 why SSC used the ability to inject messages at the
 15 counter using the SPM's ID. I won't take you to it
 16 unless you need me to. What he said was this:
 17 "Without the correct user ID at the start of every
 18 message, then there would have been errors, things
 19 wouldn't have been processed properly, from what
 20 I remember. So you wouldn't have gone in that way to
 21 make changes to the message store."
 22 So during the GLO, SSC witnesses did ultimately
 23 admit that they injected messages at the counter, didn't
 24 they?
 25 A. Yes, I was aware of that.

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1 Q. They must have had their reasons for doing that rather
 2 than injecting them at the correspondence server, as you
 3 said you believed was the proper routine?
 4 A. Yes, and I did have that conversation with John Simpkins
 5 as part of the preparation for the GLO.
 6 Q. Did he agree with Mr Roll that the reason for doing it
 7 at the counter was because, otherwise, there would have
 8 been errors and things that wouldn't have processed
 9 properly?
 10 A. No, because there was a mechanism that, if messages were
 11 injected at the correspondence server, that
 12 an artificial user ID could be picked up for those
 13 messages, so that they would process correctly through
 14 the system.
 15 Q. But he admitted that sometimes they would do it at the
 16 counter, so there must have been a reason for that.
 17 Sometimes, presumably, doing it on the correspondence
 18 server, the proper-ish way, didn't work?
 19 A. I didn't fully understand the details of the reason.
 20 There was one specific example that he did explain to me
 21 where it had to be done at the counter and it was
 22 nothing to do with injecting a transaction. I can't
 23 remember the other examples he gave to me but, as far as
 24 that was concerned, it was sufficient for me to know
 25 that there had been some injections at the counter to

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1 I cannot now remember and cannot point to any examples
 2 of this). My lawyers have looked at the Inquiry's
 3 database but they have been unable to find any records
 4 where I gave advice about substantive remote access at
 5 the counter. However, I am aware that Anne Chambers
 6 emailed me and others in 2007 and referred to a possible
 7 case for 'writing a corrective message at the counter'
 8 in relation to a particular problem she was dealing
 9 with."

10 Then you cite the email reference:

11 "My lawyers have not found any reply from me on the
 12 Inquiry's database and I am not mentioned on the
 13 associated PEAK. It is difficult to say therefore what
 14 I thought or understood in 2007 about what Anne was
 15 proposing (ie whether she meant writing a message at the
 16 correspondence server which would cause it to be
 17 replicated to the counter or writing a message at the
 18 counter itself). I do note though that in her email,
 19 Anne remembers to taking the question up with Tony
 20 [Jamasb] or Gary Blackburn of POL, so she was clearly
 21 adopting an open approach to POL about the possible use
 22 of substantive remote access.

23 "At this time, in 2007, I doubt that I would have
 24 drawn, or thought a great deal, about any distinction
 25 between substantive remote access at the counter and

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1 realise that it had been done.

2 Q. Do you accept that one of the problems or one of the
 3 possibilities of injecting transactions is that there
 4 might be knock-on consequences, unintended consequences:
 5 you tried to fix one problem by injecting a transaction
 6 and then it causes another problem?

7 A. I accept that that's a possibility.

8 Q. But you say that, at the time, you knew nothing about
 9 any of this: it was just a theoretical possibility?

10 A. That was what I understood, yes.

11 Q. Let's look at your witness statement, your fourth
 12 witness statement, please, at page 33, paragraph 106.
 13 Now, just before paragraph 106, you had set out the
 14 explanation that you gave us here in the tribunal, in
 15 other words what you've just said now, that you didn't
 16 believe that they were using the theoretical ability to
 17 inject at the counter until the GLO. But then in 106
 18 you say this:

19 "In the years when Legacy Horizon was operational
 20 (ie up to 2010), my understanding from my colleagues was
 21 that, on the rare occasions it was used, the default
 22 position was that substantive remote access was done at
 23 the correspondence server. During this period, I may
 24 have been told that substantive remote access had been
 25 done at the counter on one or two occasions (although

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1 substantive remote access at the correspondence server."

2 You wouldn't have thought about it, Mr Jenkins. You
 3 wouldn't have thought about the distinction which you
 4 now tell us is really rather important?

5 A. I agree with what I said in my statement, yes.

6 Q. Is that a truthful account, Mr Jenkins?

7 A. It is.

8 Q. It's rather at odds, isn't it, with the account that you
 9 have wanted to give over the last few days, isn't it?

10 A. I don't think so.

11 Q. Well, you've wanted to give a tidy explanation. You've
 12 wanted to say that you knew nothing about SSC injecting
 13 transactions at the counter until the GLO, didn't you?

14 A. My memory is that I thought that the transactions had
 15 been injected at the correspondence server because that
 16 was much easier for SSC to actually do things and
 17 I couldn't see any reason why they would need to do
 18 things at the counter rather than at the correspondence
 19 server.

20 Q. The truth is that you knew that injecting them at the
 21 counter was tampering with branch accounts and you knew
 22 that, if you admitted to that, it would not help your
 23 position, because you had been providing witness
 24 statements and giving evidence against Seema Misra, and
 25 yet you knew that your Fujitsu colleagues not only could

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1 but did tamper with branch accounts, didn't you?

2 **A.** I didn't feel that it made any significant difference in
3 terms of -- the accounts were being changed, whether it
4 was done at the correspondence server or the counter,
5 I just felt -- my understanding was that it was normally
6 done at the correspondence server because that was the
7 simples way of doing things.

8 **Q.** You knew, Mr Jenkins, as any sensible person would, that
9 it was essential for the safety of prosecutions to have
10 a tamper-proof evidential chain when presenting ARQ data
11 in court. You knew that, Mr Jenkins, didn't you?

12 **A.** No, I didn't.

13 **Q.** You knew, as everyone in SSC did, that the practice of
14 injecting transactions at the counter was wholly
15 contrary to being able to rely on Horizon as a source of
16 truth. You knew that, didn't you?

17 **A.** I didn't know that.

18 **Q.** You needed to be able to produce 100 per cent accurate
19 records of transactions that took place at the counter
20 in the branch but this practice corrupted that, didn't
21 it?

22 **A.** It didn't occur to me that had an impact on things.

23 **Q.** Failing to tell the court that you knew SSC were
24 injecting transactions at the counter was failing to
25 tell the whole truth, wasn't it, Mr Jenkins?

17

1 which begins:

2 "I don't know what to do about it. As it stands,
3 when they balance I think they will have a gain at the
4 branch. If we correct the POLFS feed so it nets to
5 zero, it will not be in line with the branch, and will
6 probably cause problems in future.

7 "This might be a case for writing a corrective
8 message at the counter but this has not been a popular
9 approach in the past. I could try talking to Gary
10 Blackburn or Tony [Jamash].

11 "Do you have any bright ideas?"

12 So yes, she was planning to tell Post Office about
13 it but she knew and you must have known that they
14 weren't going to like it. Do you accept that's clear
15 from the way she said this?

16 **A.** Yes.

17 **Q.** Did you know that, when she wrote this up for them later
18 in the OCP, the sort of mechanism that was used for
19 approving these injections, she stressed that what she
20 planned to do would not be visible to the branch,
21 Mr Jenkins; did you know that?

22 **A.** No, I didn't know that.

23 **Q.** But the main point, from your point of view is this: the
24 words are, in fact, unambiguous, aren't they? She was
25 proposing to write a message at the counter. She was

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1 **A.** I didn't think that at the time.

2 **Q.** Let's have a look at the email which caused you to
3 devise this tortured explanation in your witness
4 statement. If we could go, please, to FUJ00142197, Anne
5 Chambers to you, 10 December 2007. You say in your
6 witness statement it was two others but, in fact, that's
7 not correct. Two others are copied in and you are the
8 person it is directed to:

9 "Gareth,
10 "We have a problem with a branch where a single SC
11 line was written for 100 euros (£484) with no
12 settlement."

13 She gives some technical explanation:
14 "... in the middle of two RISP transactions and
15 I suspect it's another oddity in the LFS counter code."
16 Note: another oddity in the counter code,
17 Mr Jenkins. She evidently expected you to know that
18 there had been more oddities, didn't she?

19 **A.** Um, I don't recall this discussion. I don't recall
20 that.

21 **Q.** But they'd all been fixed, had they, Mr Jenkins?

22 **A.** That was my understanding.

23 **Q.** She goes on with a little more rather technical
24 terminology, which most of us, I'm afraid, probably
25 won't understand, but if we go down to her paragraph

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1 not proposing to write a message at the correspondence
2 server which could cause it to be replicated at the
3 counter, in the way that you suggest she might have
4 meant in your witness statement.

5 **A.** I took that as a loose language. I took that as being
6 a representation of doing it -- affecting the counter
7 accounts rather than the back end accounts.

8 **Q.** Loose language, Mr Jenkins, really?

9 **A.** Yes, yes. So what I was thinking that to mean was that,
10 when you inject a message at the correspondence server,
11 it has an effect on the counter, as opposed to making
12 a correction to the back-end system, which was the other
13 option she was talking about in terms of changing things
14 in POLSAP.

15 **Q.** This is just a complication or an obfuscation which you
16 have brought in to suggest that this email is somehow
17 ambiguous, isn't it, Mr Jenkins?

18 **A.** That is -- I don't know what to say to that.

19 **Q.** This email shows that you knew full well that Fujitsu
20 colleagues not only could but did tamper with branch
21 records, doesn't it?

22 **A.** I would not necessarily have taken that as being --
23 putting in an injection at the counter at that point.

24 **Q.** You must have consciously hidden that knowledge when you
25 provided witness statements and gave evidence at Seema

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1 Misra's trial, Mr Jenkins?
 2 **A.** No, I -- the concept of injecting messages was not
 3 something that occurred to me when I was doing that.
 4 Clearly, that was wrong, but that -- I'd not thought
 5 about whether messages were being injected by the SSC.
 6 **Q.** All right, well, we'll move on to body part number 3:
 7 bad error handling in the EPOSS code. Because there's
 8 another reason why you don't want to admit to knowing
 9 that transactions were inserted at the counter because
 10 that's the unintended consequences point I was talking
 11 about earlier, isn't it? If there were unintended
 12 consequences, as a result of inserting transactions, you
 13 wouldn't necessarily know about them. They were hidden
 14 by definition. Yes?
 15 **A.** I don't quite understand where you're getting at with
 16 that.
 17 **Q.** Horizon might have been failing silently all across the
 18 system, mightn't it?
 19 **A.** I don't believe Horizon was failing silently all across
 20 the system. I believe that when Horizon had failures,
 21 it was generating events that -- I accept the fact that
 22 it wasn't necessarily informing postmasters that there
 23 had been problems but I believed that there were events
 24 there that were being tracked.
 25 **Q.** If there were unintended consequences, silent
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1 program aborts with a clear error message for the
 2 subpostmaster to see and that way the process will not
 3 'blunder on'.
 4 The reason that's important, Mr Jenkins, is because,
 5 if it does "blunder on", it may create potentially
 6 incorrect results. What he said is it's far better to
 7 abort and create no results than to "blunder on" and
 8 create incorrect results that no one can identify
 9 because the error was silent; do you see his logic,
 10 Mr Jenkins?
 11 **A.** I understand that, yes.
 12 **Q.** Later in his evidence, he said this:
 13 "On the whole, the EPOSS code did not have good
 14 error handling."
 15 In other words, there were a lot of silent errors,
 16 Mr Jenkins. Then, even more than that, he said this:
 17 after going through an example of a process that had
 18 failed as a result of encountering transactions that the
 19 SSC had inserted -- so the inserted transactions had
 20 caused a process to fail -- he conceded that:
 21 "... it was not possible to know how many other
 22 processes had failed silently as a direct result of SSC
 23 inserting transactions into the branch."
 24 So the inserting capability that was intended to
 25 correct accounting problems could perfectly well have
 23

1 failures -- they're what we might call known unknowns --
 2 you knew that they were likely to be there but you
 3 didn't know how to find them to fix them, did you?
 4 **A.** I believed that the event trails would be left and
 5 events would be picked up. There was a process in place
 6 whereby events should be picked up and investigated.
 7 **Q.** Well, let's just have a think about that in the context
 8 of the evidence given by Gerald Barnes, one of your
 9 colleagues in fourth line support. Yes?
 10 **A.** Yes.
 11 **Q.** I will try to give a fair summary of what he said on
 12 this to avoid the time that would be taken if we went
 13 through it in full, and I am sure I'll be corrected if
 14 I've got this wrong. He said:
 15 "Good error handling should be coded in from the
 16 start. Really bad error handling allows a process to
 17 'blunder on' even when it has hit a problem and that
 18 means that the error is silent, at least to the
 19 subpostmaster at the time."
 20 What he said was, agreeing with you:
 21 "It will leave a trace in the event log which
 22 a diagnostician would be able to read but, because the
 23 subpostmaster is not alerted to the error at the time,
 24 no one would know where to look in the event log. Good
 25 error handling ensures that when an error occurs, the
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1 been causing many, many other uncountable numbers of
 2 other problems in the system when the processes
 3 "blundered on" and failed silently; what do you say to
 4 that, Mr Jenkins?
 5 **A.** I accept that it is a theoretical possibility.
 6 **Q.** Known unknowns -- let's look at it this way: what are
 7 known errors before they become known?
 8 **A.** Well, until they're known, they are unknown, obviously.
 9 **Q.** In some cases, Mr Jenkins, unknown errors which became
 10 known errors had existed in the system for a long time
 11 before they became known, correct?
 12 **A.** That is a possibility.
 13 **Q.** There were thousands of Known Error Log entries, weren't
 14 there, Mr Jenkins?
 15 **A.** I'm not sure how many Known Error Log entries there
 16 were. I don't know the volumes.
 17 **Q.** There were thousands, weren't there; you knew that?
 18 **A.** I didn't know how many Known Error Log entries there
 19 were.
 20 **Q.** There's no way of knowing, Mr Jenkins, how many unknown
 21 errors there were, is there?
 22 **A.** My understanding was that the system was behaving well.
 23 **Q.** You're not a fool, are you, Mr Jenkins?
 24 **A.** I don't believe so.
 25 **Q.** You would have known of the potential unintended
 24

1 consequences of the SSC going off piste, wouldn't you?
 2 **A.** I wasn't aware that the SSC were getting involved on --
 3 my understanding was it was very, very rare for the SSC
 4 to need to inject any sort of transactions. Yes, you've
 5 got -- you've shown me an example here but my
 6 understanding was that it was a very rare occurrence for
 7 such things to happen.
 8 **Q.** Body part number 4: the EPOSS code itself. Professor
 9 Cipione assessed the examples of EPOSS code that David
 10 McDonnell used to draw attention to problems with the
 11 EPOSS code back in 1998. I don't intend to call what he
 12 says up, a few quotes will do. Take into example 1,
 13 Professor Cipione said:
 14 "This is terrible code. This is terrible code."
 15 He said it twice:
 16 "This has to be a joke. I mean, this has to be
 17 a joke because this is a ridiculous set of code."
 18 Taken to another example:
 19 "It's just not the right structure and it indicates
 20 to me that they don't understand what those particular
 21 structures are."
 22 Taken to another example:
 23 "So either this is written by someone not so smart
 24 in here or there's been multiple updates to this code.
 25 Either way, it's a bad example."

25

1 **Q.** Did anyone tell you in 2004 about this history?
 2 **A.** Not that I recall.
 3 **Q.** So no one told you that it might be important to keep
 4 an eye on this beast which had these sections of
 5 dreadful code in?
 6 **A.** Not that I can recall.
 7 **Q.** Did you have anyone assessing the quality of the fixes
 8 that were being put in under your watch, as it were?
 9 **A.** I was relying on the competence of the designers and
 10 developers who were actually doing the detailed coding
 11 at that time.
 12 **Q.** So no one assessed their work to ensure it was done to
 13 a high standard?
 14 **A.** Well, they were assessing each other's work. That was
 15 part of their process.
 16 **Q.** When they were assessing each other, did anyone raise
 17 any concerns with you about the quality of the code or
 18 the fixes?
 19 **A.** I can't recall any examples of that.
 20 **Q.** Do you say you can't recall but there might have been
 21 some?
 22 **A.** It is possible but I can't recall. My understanding was
 23 that it was working well by that time.
 24 **Q.** How many bugs were being addressed on a weekly basis?
 25 **A.** I can't remember.

27

1 When did you take over as the counters man,
 2 Mr Jenkins? When did the EPOSS code become your
 3 problem?
 4 **A.** I'm not sure the EPOSS code became my problem. My role
 5 was to do with actually designing the -- at the high
 6 level, the way that the counter needed to work in terms
 7 of impact, which would have been around 2004/2005,
 8 something like that.
 9 **Q.** But you would accept, wouldn't you, that, for the
 10 counter to work, it has to work on the basis of the
 11 EPOSS code, yes?
 12 **A.** Yes.
 13 **Q.** So when did the quality of the EPOSS code become your
 14 problem?
 15 **A.** Like I say, around 2004/2005. That sort of time.
 16 **Q.** Do you say it had stabilised when you took it over?
 17 **A.** I believed that it had.
 18 **Q.** What safeguards did you put in place to assess that?
 19 **A.** I didn't do anything specific about that. My
 20 understanding was that it had been working well for some
 21 time before I got involved with it. I accept that there
 22 were these problems in the early days, which I hadn't
 23 been involved in specifically, but there had been plenty
 24 of time then for things to have been sorted out and for
 25 it to be working stably.

26

1 **Q.** Tens? Hundreds? Thousands?
 2 **A.** I don't know.
 3 **Q.** You don't know?
 4 **A.** I don't know.
 5 **Q.** Who was your line manager, Mr Jenkins?
 6 **A.** It varied a lot over the time.
 7 **Q.** What was their job title; what was their role?
 8 **A.** Design Managers, Chief Architect. There was that sort
 9 of role.
 10 **Q.** What was your reporting line to the Board?
 11 **A.** What do you mean by "the Board"? Do you mean the Post
 12 Office Account Board or the Fujitsu Board, or whatever?
 13 **Q.** The Fujitsu Board: what director were you sitting under?
 14 **A.** I've no idea. This would have been about sort of seven
 15 or eight levels above me.
 16 **Q.** So, in other words, a very indirect reporting line,
 17 then, all the way up to the Board; is that right?
 18 **A.** Yes.
 19 **Q.** How would anybody have raised any problems to the Board
 20 if they were concerned about the quality of the EPOSS
 21 code and the fixes that were going in to try to make it
 22 better?
 23 **A.** I've no idea.
 24 **Q.** No whistleblowing procedures that you were aware of?
 25 **A.** Not that I'm aware of.

28

1 Q. Body part number 5, Mr Jenkins: hardware failure. Would
2 you accept that, from the year 2000, you knew that when
3 hardware failed and was swapped out, there could be
4 problems with recovering transactions?

5 A. Yes, I was aware of that but I was also aware that it
6 didn't happen very often.

7 Q. How were you aware of that?

8 A. Again, informal conversations.

9 Q. Informal chats, I see. People said to you in informal
10 chats, "Oh yeah, no, we don't have recovery problems
11 after hardware failures very often. That's not
12 something that happens very much"; is that right?

13 A. That was how I understood things.

14 Q. I see. Well, I won't need to take you, then, to one of
15 the PinICLs from the year 2000, in which you yourself
16 dealt with a recovery problem and in which you said
17 this:

18 "This was another example of recovery having gone
19 wrong after a box swap."

20 Do you take my point from the way I emphasised the
21 word "another example"?

22 A. Yes, I understand what you're getting at there.

23 Q. You personally knew that there were plenty of examples
24 of recovery problems after box swaps, didn't you?

25 A. It depends what you mean by "plenty". Clearly, there
29

1 Q. But you conceded that you'd, in fact, done nothing at
2 that stage to find out whether there had been any
3 hardware failures at Mrs Misra's branch?

4 A. Yes, I accept that.

5 Q. The fact is, your Data Integrity Report reassures,
6 doesn't it? It's intended to give comfort that there
7 won't be a loss of data if there is a hardware failure.
8 That's the point of it, isn't it?

9 A. It says that, in normal circumstances, there won't be
10 but it does accept the fact that potentially there could
11 be.

12 Q. The message really, by attaching it, was that "You,
13 Professor McLachlan, you can rule out the idea that
14 hardware failures might have caused discrepancies"; that
15 was the point of attaching it, wasn't it?

16 A. No, it was to show that there was a possibility of it
17 happening but otherwise that it was a very rare
18 possibility.

19 Q. On Tuesday when Mr Beer first asked you what you knew of
20 the duties of an expert you said, "I just thought I had
21 to answer the questions I was asked truthfully", yes?

22 A. Yes.

23 Q. You relied on that a lot in your answers when Mr Beer
24 asked you why you didn't reveal the complete picture.

25 You would say, well, you'd just answer the questions
31

1 were -- it had happened more than once.

2 Q. You were aware of persistent problems with
3 synchronisation between counters, within a branch, after
4 a hardware failure. You knew that they were
5 a persistent problem, didn't you?

6 A. I knew they had been in the early days but I believe the
7 problem you're referring to did get fixed.

8 Q. Let's look at what you said about hardware in your Misra
9 evidence. Your third statement for the Seema Misra
10 trial, you attached the Horizon Data Integrity Report to
11 it, didn't you?

12 A. I did.

13 Q. In fact, what you did was a formal process that we
14 lawyers refer to as exhibiting your report. Did anyone
15 tell you what "exhibiting" means?

16 A. Just attaching a document, rather than cutting and
17 pasting it into the formal statement.

18 Q. It makes it part of the evidence, Mr Jenkins. Did you
19 understand that?

20 A. No, I didn't understand that.

21 Q. You told Mr Beer that you did this, you exhibited this
22 report, because you thought it gave a useful summary of
23 the sort of hardware failures that could occur that
24 could possibly cause loss of data.

25 A. Yes, I accept that.

30

1 that you were asked, yes?

2 A. Yes.

3 Q. That also applied to the way you approached your witness
4 statements for the Misra trial on the whole, isn't it?

5 A. Yes.

6 Q. But that's not what happened here, is it, Mr Jenkins?
7 The question that you were supposedly answering was
8 this:

9 "I have been requested to comment on the issue
10 raised by the defence in relation to a post office
11 called Callendar Square, Falkirk that was mentioned at
12 the Castleton trial."

13 No one had asked you about hardware, had they,
14 Mr Jenkins?

15 A. I can't remember.

16 Q. Well, they hadn't, had they?

17 A. I --

18 Q. It was not one of Professor Cipione's questions, was it?

19 SIR WYN WILLIAMS: Sorry, not Professor Cipione.

20 MS PAGE: I'm so sorry, Professor McLachlan.

21 SIR WYN WILLIAMS: Yes.

22 A. I can't remember.

23 MS PAGE: Well, you were answering a series of his questions
24 in that statement and the one that you had just answered

25 when you attached this report was about the Callendar
32

1 Square bug. He had not asked you about hardware and he
2 had not asked you about data integrity. He had asked
3 you about the Callendar Square bug. Attaching your data
4 integrity report there was an attempt, wasn't it, to
5 answer an implied question which flowed from all of his
6 hypotheses. That implied question might have been
7 something like "Could any system failures have affected
8 Mrs Misra's branch accounts?" That was a sort of
9 implied question from all of the whole piece of work
10 that he'd been doing, the hypotheses he'd been putting
11 forward; do you accept that?

12 **A.** I'd not thought of it that way.

13 **Q.** No, you'd not thought of it that way. Well, the report
14 that you attached was specifically about data integrity.
15 So were you answering an implied question along these
16 lines: how do we know that the data underpinning
17 Mrs Misra's branch accounts has integrity?

18 Was that the question that you thought you were
19 answering?

20 **A.** I can't remember what -- the exact circumstances of what
21 I thought I was answering.

22 **Q.** What you did here, in truth, is you exhibited this
23 report to your witness statement as if it were providing
24 the wider picture showing what Horizon was really about.
25 That's what you were doing, wasn't it?

33

1 **A.** That is not what I was trying to do.

2 **Q.** Ultimately, that meant you were throwing mud in the
3 jury's eyes?

4 **A.** That was not my intent.

5 **Q.** Let's just remind ourselves of the question you were
6 asked which you didn't answer. It went like this: do
7 you know whether there are any known problems with the
8 Horizon system that Fujitsu are aware of?

9 The truthful answer to that question would have
10 covered all the body parts, wouldn't it? Cash accounts;
11 remote access; tampering; bad error handling; silent
12 faults across the system; the EPOSS code; the terrible
13 code -- the terrible code; hardware failures, persistent
14 hardware failures; recovering transactions that were
15 lost; failing to recover transactions that were lost.

16 **A.** That was not how I understood the question to be.

17 **Q.** That was not how you understood the question. No.

18 There was even a bit more, wasn't there, because
19 there was also the true bolt-ones, the Bank of Ireland
20 cash points; they were a catastrophe, weren't they?

21 **A.** I don't have any real knowledge about the Bank of
22 Ireland cash points and what the issues were with those.

23 **Q.** The Horizon Lottery terminals: they were a problem in
24 Mrs Misra's branch, weren't they?

25 **A.** I was not aware there were any problems with the Lottery

35

1 **A.** I can't remember. Sorry.

2 **Q.** You were stepping outside the narrow task of responding
3 to Professor McLachlan's hypotheses and questions, and
4 you were purporting to give the wider picture, "Don't
5 worry about data integrity, this is a good system. The
6 data is sound. The system couldn't have caused the
7 discrepancies". That's why you exhibited it, isn't it,
8 Mr Jenkins?

9 **A.** I can't remember exactly why I decided to exhibit it at
10 the time.

11 **Q.** Even though you told us, during the course of this week,
12 that the report had been created for a narrow purpose,
13 only intended to respond to the narrow hardware failure
14 scenarios that Post Office had asked you to deal with,
15 and then yet you then exhibit it to a witness statement.
16 Why did you do that, Mr Jenkins?

17 **A.** I can't remember.

18 **Q.** This was a deliberately and knowingly deceptive
19 reassuring report to exhibit to this statement in this
20 context, wasn't it?

21 **A.** I'm not sure that it was reassuring, particularly. It
22 did indicate that there were circumstances in which data
23 could be lost.

24 **Q.** You were throwing mud in Mr McLachlan's eyes, weren't
25 you, Mr Jenkins?

34

1 terminals.

2 **Q.** Bureau de Change: that was another disaster area, wasn't
3 it?

4 **A.** I'm not aware of any specific problems with Bureau de
5 Change.

6 **Q.** You hid all these issues and problems when you gave
7 evidence against Seema Misra, didn't you?

8 **A.** No.

9 **Q.** You did that, even though she was standing right there
10 in the dock in front of you?

11 **A.** I don't believe that I deliberately hid anything.

12 **Q.** Let's just take a quick final look before I finish with
13 how you reacted after she was convicted on the strength
14 of your evidence. We've already seen how, after the
15 trial, you were jokingly rather pleased with the
16 mistaken title of Professor, so I won't go to that.
17 What I'll go to is this, FUJ00156418. This is in
18 February 2011. It's from you to Penny Thomas. Now, if
19 we just scroll down a bit, it's a reply from her. She
20 says:

21 "Okay, Gareth.

22 "Did you watch the Inside Out programme last
23 evening?"

24 Let's go up to your reply.

25 "Yes, I did."

36

1 Do you remember that Inside Out programme?
 2 **A.** Not in detail, no.
 3 **Q.** Do you remember that it starts with Davinder Misra,
 4 Mrs Misra's husband, who sits a little further along
 5 from me, in tears, because his wife is behind bars?
 6 **A.** I don't remember that, I'm afraid, sorry.
 7 **Q.** This is what you said about that:
 8 "I was pleased that Fujitsu wasn't mentioned. [Post
 9 Office] have a significant problem!
 10 "I also note that the screenshots were HNG-X
 11 [Horizon Online] and not Horizon.
 12 "I remember chatting to Mr Misra outside the court!"
 13 Do you have anything to say about that, Mr Jenkins?
 14 **A.** My feeling was then and is now that the issues to do
 15 with this are down to the way that Post Office has
 16 behaved, rather than actually faults in the Horizon
 17 system, and that, I think, is what was behind what
 18 I said there.
 19 **Q.** Yet you told the judge that you being a Fujitsu man had
 20 no impact on your evidence?
 21 **A.** I don't believe that it did. I believe that I told the
 22 truth as I understood it at the time.
 23 **Q.** "I was pleased that Fujitsu wasn't mentioned."
 24 **A.** Yes.
 25 **Q.** You were a Fujitsu company man doing what Fujitsu needed

37

1 the time.
 2 **Q.** You knew that your role was to help get that clean bill
 3 of health, wasn't it?
 4 **A.** My role was to tell the truth.
 5 **Q.** You tailored your evidence accordingly, didn't you?
 6 **A.** No. I addressed -- I attempted to answer as best as
 7 I could the questions that I was asked.
 8 **Q.** Never mind whether a byproduct of protecting the monster
 9 was that a woman was sent to jail, Mr Jenkins: never
 10 mind that.
 11 **A.** I'm sorry for what happened to Mrs Misra but I feel that
 12 was down to the way that POL had actually behaved and
 13 wasn't purely down to me. I clearly got trapped into
 14 doing things that I shouldn't have done but that was not
 15 intentional on my behalf -- my part.
 16 **MS PAGE:** Thank you, sir. Those are my questions.
 17 **SIR WYN WILLIAMS:** Thank you very much, Ms Page. We will
 18 break off now and we will resume again at 10.55.
 19 **(10.45 am)**

(A short break)**(10.56 am)**

22 **MR BEER:** Sir, good morning. Can you see and hear us?
 23 **SIR WYN WILLIAMS:** Yes, thank you.
 24 **MR BEER:** I think Mr Stein is next to ask questions.

Questioned by MR STEIN

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1 you to do: protect the monster.
 2 **A.** I didn't think it was a monster.
 3 **Q.** Let's go finally to one last document, please:
 4 FUJ00156460. If we go to the bottom of page 1 and zoom
 5 in, please, on paragraph 8a. This is you providing some
 6 content for your appraisal. I should have shown you the
 7 date, I'm so sorry, this is March 2011.
 8 **A.** Yes.
 9 **Q.** So this is your performance appraisal. 8a:
 10 "I spent some time with POL supporting a series of
 11 court cases where POL was prosecuting ex-postmasters for
 12 theft where the postmasters were claiming a problem with
 13 the system. Cases were:
 14 "a. West Byfleet: For this case I spent some time
 15 analysing a year's worth of transactions and explaining
 16 to the defence expert how Horizon worked. I was
 17 required to comment on the defence expert's reports and
 18 spent a week at the court during the trial including
 19 a full day in the witness box being examined and
 20 cross-examined by the barristers. The defendant was
 21 found guilty of Theft and Horizon was given a clean bill
 22 of health."
 23 You knew that the Misra trial was a test case for
 24 Horizon, didn't you?
 25 **A.** I realised that afterwards. I'm not sure if I did at

38

1 **MR STEIN:** Mr Jenkins, I've got a number of questions for
 2 you but can we travel back in time to the development of
 3 the Horizon system. You were part of the team that was
 4 working on what became the Horizon system; that's right,
 5 isn't it?
 6 **A.** I was involved with the agent side of things, rather
 7 than the counter side of things at that time.
 8 **Q.** Okay. Now, from your knowledge of that I want you to
 9 help us with something that Mr Coombs -- that's Mike
 10 Coombs, he's the former Horizon Programme Director at
 11 ICL Pathway, and he gave evidence on the 1st November
 12 2022 -- I want to ask you about something he said and he
 13 if you can help. He was asked this question:
 14 "Were you aware, during your time working as
 15 Programme Director, that Post Office Counters Limited
 16 were intending to place reliance upon data recorded on
 17 Horizon to support the bringing of civil and criminal
 18 proceedings against subpostmasters and office managers
 19 suspected of fraud?"
 20 Mr Coombs answer was this:
 21 "I didn't have the faintest idea that they were
 22 considering using information and I had no idea at all
 23 they were considering taking the step of prosecuting
 24 members of their own organisation."
 25 Now, if we go back in time to the work you did do

40

1 that at least contributed to the overall system at that
 2 stage and then perhaps the beginning of the Horizon
 3 period, in around about, what, 1999/2000. At that time,
 4 were you aware that Post Office was intending to place
 5 reliance on the data recorded on the Horizon system to
 6 support the bringing of civil and criminal proceedings?
 7 **A.** I was aware at some time. I can't remember at what
 8 stage. It was probably in the early 2000s but I'm not
 9 sure exactly when.
 10 **Q.** Right. Were you aware at that same perhaps early stage
 11 that the Post Office was using the data from the Horizon
 12 system in order to conduct audit visits, in other
 13 words -- from the point of view of subpostmasters and be
 14 stresses -- essentially, raids on their premises; were
 15 you aware that it was being used in that way?
 16 **A.** I can't remember at what stage that I got involved in
 17 that sort of detail but it would be probably some time
 18 in the early 2000s, but exactly when I can't remember.
 19 **Q.** So at some point, this was to your knowledge, and you
 20 think in the early 2000s?
 21 **A.** Yeah.
 22 **Q.** Can you help us with whether, to your knowledge, either
 23 Fujitsu or the Post Office made sure that the design
 24 parameters of the Horizon system were up for the task of
 25 supporting civil actions and prosecutions?

41

1 **Q.** Now, we know from your evidence and from your statements
 2 that you were very much part of the Litigation Support
 3 system. I think you called it in your statement,
 4 prosecution support, or something similar to that? Is
 5 that what --
 6 **A.** Yes, I mean, I can't remember the exact term that was
 7 used but, yeah --
 8 **Q.** Something like prosecution support --
 9 **A.** Yeah.
 10 **Q.** -- seems to be what you say?
 11 **A.** Yeah.
 12 **Q.** Okay. Now, Terence Austin gave evidence in October 2022
 13 and he was asked questions, which I will paraphrase,
 14 which were about what training events and training
 15 material was available in relation to the question of
 16 support for litigation, prosecution support. Okay?
 17 **A.** Okay.
 18 **Q.** Let me take that in bits for you. Were there any
 19 training events, opportunities, you know, hours in the
 20 day set aside, parts of maybe a weekend or a day set
 21 aside, for training purposes to do with the prosecution
 22 support job?
 23 **A.** Not as far as I was concerned. I don't know what the
 24 people whose its full time job was to do, to support
 25 that, people like Penny Thomas, and so on, but I wasn't

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1 **A.** Sorry, I can't help you with that.
 2 **Q.** Is there anything, to your knowledge, that was done to
 3 make sure that the Horizon system was good or fit for
 4 purpose, the fit for purpose being the support of
 5 proceedings against subpostmasters/mistresses, and
 6 people working in their branches?
 7 **A.** I believe I heard someone saying that they'd taken
 8 advice as to whether the audit trail was something that
 9 could be used in court proceedings but that's sort of
 10 second, thirdhand type knowledge, but exactly when
 11 I acquired that knowledge, I'm not sure.
 12 **Q.** All right, so from your work, since before 2000 and then
 13 you were still consulting for Fujitsu in 2022; is that
 14 right?
 15 **A.** I think my last actual consultation was just before
 16 Covid in 2000 but I was still on a retainer until 2022.
 17 **Q.** Okay. So for the period of time that we're talking
 18 about, roughly -- certainly over 20 years, you're not
 19 aware that there was a "Let's make sure that this
 20 Horizon is up for the task of supporting prosecutions,
 21 civil actions or indeed properly attending upon people
 22 in audit"? You're not aware of anything that was done
 23 to guarantee that the system was good for that; is that
 24 fair?
 25 **A.** That's probably fair.

42

1 aware of any training.
 2 **Q.** When you say not aware --
 3 **A.** I mean, I didn't have any training.
 4 **Q.** Right. That's what I'm trying to find out --
 5 **A.** No, I've had no training in that and I realise now
 6 I should have done but it didn't occur to me at the time
 7 that I was lacking that.
 8 **Q.** Were you offered any such training opportunities, you
 9 know, opportunities to learn about systems in
 10 litigation, either civil litigation or in criminal
 11 litigation? Were you offered such opportunities to --
 12 **A.** No, I wasn't.
 13 **Q.** Now, you've been asked in your statements about whether
 14 you were provided with guidance, standards or protocols
 15 or something similar that relates to investigations and
 16 prosecutions. As we understand your statement, I think
 17 it's your third statement -- I don't need to go to the
 18 paragraph, I have a note of it -- your third statement,
 19 which is WITN00460300, at paragraph 35, you say this you
 20 "don't recall reading any of them at the time". Now,
 21 the "them" you were referring to there was guidance,
 22 policies, protocols about giving evidence, okay?
 23 **A.** I'm not sure that I was aware that any such things
 24 existed.
 25 **Q.** Right. In a way, you're anticipating my next question.

44

1 A. Sorry.

2 Q. No, that's fine. Are you saying that you were not
3 provided with any of these manuals; is that what you're
4 saying: nobody brought them to your attention?

5 A. No.

6 Q. No?

7 A. No.

8 Q. You didn't ask to see any of these things?

9 A. No, I didn't. I realise now I should have done but it
10 didn't occur to me at the time.

11 Q. Who, within the Fujitsu organisation that you worked
12 for, should have been responsible, in your view, for
13 providing you with such materials?

14 A. I assume it's the Security Team or possibly some of the
15 lawyers that were behind that, so to speak. Though I'm
16 not sure that there were direct lawyers responsible for
17 the Security Team, which I think is another one of the
18 issues that I concede, looking back with hindsight.

19 Q. Within the Security Team, I've asked you questions about
20 training opportunities, events, manuals, guidance,
21 policies, all of those possible opportunities to enhance
22 your understanding of what you were about; who within
23 security should have provided you with such
24 opportunities?

25 A. I guess the Manager of the Security Team, that varied
45

1 things. So I don't know if that answers your question.

2 Q. It does, and you will recall being asked many a question
3 by Mr Beer about this question of belief: things that
4 you were told --

5 A. Yes.

6 Q. -- and information that you had been supplied?

7 A. Yes.

8 Q. So on this question of belief that the people within the
9 system, operating the system and putting the entries to
10 the PEAK and PinICLs in, and the like, what did you have
11 to say in the fact that they were doing -- well, as
12 an example, quality assurance reports, reports to you
13 saying that, actually, there are these issues, we're
14 addressing them. This is regarding the inputting of
15 data. What do you have to provide a measurement of how
16 well they were doing it? Did you have any of that sort
17 of material?

18 A. No, I didn't.

19 Q. Just moving that on slightly further, what quality
20 assurance systems were embedded within the system to
21 assure the quality of the PEAK/PinICL process? So what
22 was there by way of, I don't know, comparison to other
23 similar systems, that type of comparative quality
24 assurance?

25 A. I don't know, is the simple answer.
47

1 over time. The one name I can remember is Brian Pinder,
2 but there were a number of Security Managers over the
3 time.

4 Q. Now, in your statements you discuss the question of
5 whether the PEAK, PinICL or KEL system was effective.
6 This is from your first statement, I think,
7 WITN00460100, paragraph -- I think it is 47, page 13.
8 You state this and, again, if I summarise this wrong or
9 badly then I'm sure that someone will correct me. You
10 say about the PEAK-PinICL system, that:
11 "Used properly [you] believed that it was a good
12 tool but only as good as the users handling it."

13 A. Yes, I accept that.

14 Q. You stand by that, do you?

15 A. Yes.

16 Q. Okay. So as far as it goes, the PEAK, PinICL, and you
17 include within that the KEL system, was okay, but you
18 can't speak to the quality of those people that were
19 operating it; is that fair?

20 A. Not quite. KELs, I had very little to do with. I saw
21 KELs as being primarily something to support the
22 Helpdesks, rather than something to use at the back end.
23 As far as the PEAKs were concerned, then that was down
24 to whatever anyone put on it. I believed that the guys
25 in the SSC were competent and were doing a good job of
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1 Q. You say in your first witness statement, WITN00460100,
2 page 13, paragraph 47, as regards the system itself, in
3 terms of the PEAK/PinICL system and, I suppose, the
4 operation of the Horizon system, you say this:
5 "I have no point of comparison to offer the
6 Inquiry", because your work has only been, essentially
7 on the Horizon system.
8 Is that fair?

9 A. Yes, that's fair.

10 Q. Right. Were you aware of any industry standard or
11 benchmark being applied to the Horizon system?

12 A. There were standards in particular areas. So, for
13 example, when we interacted with the banks we had to
14 conform with banking standards, and things like that
15 but, in terms of it overall system, then no.

16 Q. If we bring all of this together, essentially what
17 appears to be the situation is that at no time were you
18 either given or did you ask for an overall measurement
19 of the quality of the Horizon system, its operation
20 through from the inputting of materials or data on to
21 the PEAK/PinICLs. That just simply wasn't something
22 that you had; is that fair?

23 A. Yes, I think that's probably fair.
24 I'd not thought of it that way before but, yes,
25 I accept what you're saying.
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1 Q. Now, subpostmasters/mistresses, their branch managers,
2 their employees. Unless I misunderstand what you've
3 said about your work for Fujitsu, you've worked in this
4 country?
5 A. And I've worked abroad for brief periods as well.
6 Q. Brief periods. You've lived in this country for
7 essentially your life?
8 A. Most of my life, yes.
9 Q. You're as familiar with the Post Office branches as then
10 many people are. You know, you go to different parts of
11 the country, you see the small branches in small
12 villages. You're familiar with that.
13 A. I see that -- I'm not sure that I visit post office
14 branches that often. I probably visited more often the
15 last two or three years because the banks have closed
16 down and I have to use post office for banking money.
17 Q. You're aware that the small places sometimes have
18 grocery side to them and operate as more of a general
19 store?
20 A. Yes, I am aware of that.
21 Q. You're aware that, very often, not always, always, but
22 very often that they're run by families working and
23 living effectively in the same premises?
24 A. Yes.
25 Q. You're aware that there's, therefore, a reliance upon

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1 prosecutions but I'm not sure exactly when I became
2 aware of that.
3 Q. Right. You understand that people working in branches
4 of the Post Office aren't necessarily computer experts;
5 you know that?
6 A. Oh, yes.
7 Q. You know that the data given to people working in
8 branches is, as it's been described by many witnesses,
9 relatively limited?
10 A. I'm not quite sure what you mean by "relatively
11 limited".
12 Q. Well, they don't have full access to the system that you
13 enjoyed?
14 A. My understanding was that, if someone was being
15 prosecuted, then they would be given access to the data.
16 I now appreciate that they weren't always -- that didn't
17 always happen.
18 Q. So the answer is, yes, you are, at least now aware --
19 A. Yeah.
20 Q. -- that the people in branches were not given the full
21 access to the system that you enjoyed?
22 A. Oh, yes, I certainly accept that now, yes.
23 Q. Right. So this pressing of subpostmasters to pay up for
24 any shortfall, did that concern you, Mr Jenkins, when,
25 as you say, you knew that, you think, when giving these

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1 the Post Office, I suppose, from the postmaster/mistress
2 point of view, for the Post Office to treat them fairly?
3 I'm sure that you would think that that should be what
4 was happening?
5 A. And that's what I would expect to happen, yes, but
6 I appreciate now that that isn't what has happened.
7 Q. I want you to help us with one aspect of the way the
8 postmasters/mistresses and, indeed, their branch
9 employees were dealt with by the Post Office. Were you
10 aware that the branches were told that they were liable
11 contractually for any shortfalls and they had to make
12 good those shortfalls? Were you aware that that was the
13 consistent message that was sent and given to
14 subpostmasters/mistresses and people working in
15 branches?
16 A. I'm certainly aware of that now. I'm not sure exactly
17 when I became aware of that.
18 Q. Again, that was going to be my next question.
19 A. Sorry.
20 Q. When did you become aware that subpostmasters/
21 mistresses, people working in branches, were told,
22 "Look, if there's a shortfall, you have got to pay up
23 and make it good"? Help us understand when you knew
24 that.
25 A. I think I was aware of that when I was involved with the

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1 statements? Did that make you think, "Hmm, that doesn't
2 seem quite right"?
3 A. I didn't understand it quite in those ways at that time,
4 is the issue, I think.
5 Q. Well, you either understand it, Mr Jenkins, or you
6 don't, don't you? You either go, "Right, I understand
7 that people are being told to pay up for shortfalls
8 irrespective of fault," or "I don't know that". You
9 seemed to be saying a minute ago that you did know that.
10 A. It's not something I'd really considered seriously at
11 the time and I accept, with hindsight, I should have
12 done.
13 Q. Well, you said repeatedly in your evidence -- and I'll
14 come to this again a bit later -- that you don't think
15 that the Post Office handled subpostmasters fairly. But
16 you knew that the Post Office was pressing people to pay
17 up irrespective of fault. That seems to be something
18 that was in your knowledge. How do you ignore that,
19 Mr Jenkins?
20 A. Well, I'm not sure what -- I'd not taken it as being --
21 the without-fault bit of it is the bit that I'd not
22 really fully understood and comprehended at the time,
23 I think, is really what it comes down to.
24 Q. Let's try to work out what you're saying. You seem to
25 be saying that, whilst you were giving statements

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1 supporting the prosecution role of the Post Office, that
 2 you had some awareness that people were being told to
 3 pay up for shortfalls but you didn't know perhaps how
 4 that was being explained to the people in the branches;
 5 is that what you're saying?

6 **A.** I was looking -- my approach was looking at how Horizon
 7 was working, rather than the effect on postmasters, and
 8 I appreciate that was wrong and I should have been more
 9 concerned about the impact on postmasters. But my role
 10 was, I saw, was more of a technical one and that's where
 11 I was coming from.

12 **Q.** Do you regard yourself as being an uncaring person?

13 **A.** No, but I deal better with systems and things than
 14 people.

15 **Q.** That doesn't mean that you --

16 **A.** I'm not saying I'm uncaring at all.

17 **Q.** Yes, but despite --

18 **A.** I just wasn't thinking things through, like I should
 19 have done.

20 **Q.** Did you turn to anyone and say, "Well, I'd like to know
 21 a bit more about what's going on in these branches"?

22 **A.** No, I didn't.

23 **Q.** Is it perhaps more likely to be the truth that none of
 24 the work that you did for the Post Office in supporting
 25 the prosecutions had even a glimmer of a care about the

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1 scripts at the time.

2 **Q.** No. Now, the problem with turning off the branch system
 3 is that it disconnects from the rest of the network; is
 4 that right?

5 **A.** Yes, but with Legacy Horizon the whole system was
 6 designed to be able to operate when turned off from the
 7 rest of the network anyway and, certainly in the early
 8 days, it was expected that most branches would be off
 9 the network most of the time.

10 **Q.** The idea is that when actually relinked, in other words
 11 turned back on or power restored, whatever it is, that
 12 the systems would catch up with each other.

13 **A.** Yes.

14 **Q.** That's how it was planned?

15 **A.** Yes, indeed.

16 **Q.** But that's not a 100 per cent guaranteed system. It can
 17 lead to problems with data transfer?

18 **A.** No, I would dispute that. I would say that the design
 19 of the system was that it would catch up. If it was
 20 just a simple case of turning the box off and on again,
 21 then the data would all be caught up in time and that
 22 was one of the main reasons why the Riposte product was
 23 chosen by Post Office.

24 **Q.** There's some suggestion that there are different bits of
 25 the Horizon system, that, in other words, if you have

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1 subpostmasters and their branches?

2 **A.** I'd just not been looking at it in that way.

3 I appreciate I should have done but I was just looking
 4 at things from the point of view of how Horizon was
 5 operating.

6 **Q.** Turning to a different topic --

7 **SIR WYN WILLIAMS:** Before you do that, Mr Stein, can I just
 8 ask:

9 So far as you can recall, Mr Jenkins, were you aware
 10 brought into a case before a decision to prosecute was
 11 taken or was it, as far as you can recall, always the
 12 case that you were asked to assist once a decision to
 13 prosecute had been taken?

14 **A.** As far as I'm aware, a decision to prosecute had always
 15 been taken long before I got involved. I can't say
 16 that -- I can't be absolutely certain that was the case,
 17 but from what --

18 **SIR WYN WILLIAMS:** But that's your recollection.

19 **A.** That's my recollection, yes.

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

21 Sorry, Mr Stein.

22 **MR STEIN:** We know that, on occasions, call handler scripts
 23 would advise subpostmasters to turn off the system.

24 I can give a reference if we need it and go to --

25 **A.** I've seen such scripts now. I wasn't aware of the

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1 a part of the system working in Leeds, that that might
 2 relate to servers that relate to that area. Were there
 3 different operational areas for Horizon?

4 **A.** I'm not quite sure what you mean. We -- with Legacy
 5 Horizon, we had two data centres, in Wigan and Bootle,
 6 and all the systems in the UK connected through to one
 7 or other of those data centres, using the BT telephone
 8 network in general, though I think there was some
 9 differences in Hull because that's not on BT, but -- and
 10 there were a few obscure offices that used satellite
 11 systems, rather than the BT network when there wasn't
 12 suitable BT coverage.

13 But the systems did, in general, all connect through
 14 to the main data centres.

15 **Q.** So we've got -- so I can understand your evidence is
 16 about this. Legacy Horizon, you've got essentially two
 17 different servers?

18 **A.** No, we had two separate data centres, really for
 19 disaster recovery, so I think the example that was used
 20 was that if a Jumbo Jet landed on one of them the other
 21 could carry on doing the work. Obviously that never
 22 happened. So the idea was just to make sure we had two
 23 data centres sufficiently far apart that they were very
 24 unlikely to both fail at the same time.

25 **Q.** Would bugs, defects or errors affect every counter on

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1 Horizon or could some affect only a limited number of
2 counters?
3 **A.** It depends on the bug. So yes, there could be issues to
4 do with what was happening in the background on the
5 boxes and things like that, could cause timing type
6 issues, and so on, and those were the more difficult
7 things to actually understand what was going on. But in
8 general, my understanding was that the system was
9 working well in the majority of branches. The problem
10 has been that in a few branches things didn't always
11 operate correctly.
12 **Q.** Why would it be possible for particular bugs, errors and
13 defects to affect a particular group of branches and not
14 the entire system if, going back to your evidence
15 a second ago, it's operating as one system?
16 **A.** To do with issues of timing and just minor differences
17 in terms of how the hardware operated all the sort of
18 sequence of activities, different postmasters would do
19 different sequences of activities and others, some typed
20 faster than others, and things like that. So it was
21 timing-type issues and things like that. So things that
22 were basically unpredictable.
23 **Q.** So correspondence, in other words similar things
24 happening at a similar time, could mean that particular
25 branches all doing that at a similar time could be

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1 **A.** Yes --
2 **Q.** Okay --
3 **A.** -- they had to sign them all off.
4 **Q.** -- and that those software updates included references
5 to the bugs that had been fixed by them, that sort of --
6 **A.** Yes.
7 **Q.** Right, okay. We've had the benefit -- when I say "we",
8 I'm instructed by a firm of solicitors that have been
9 involved with these issues now for well over a decade,
10 Howe+Co solicitors. We've had the benefit of some *pro*
11 *bono* advice, as allowed for by the Inquiry, in relation
12 to computer expert advice. Okay? One of the parts of
13 that advice that sticks with me is that, in the software
14 fixing world, you fix 20 bugs, errors or defects and 19
15 more crop up; is that sort of a familiar IT expectation,
16 that fix one bug, others crop up, because, necessarily,
17 it affects the system as you go forward?
18 **A.** I certainly accept the fact that fixing a bug can
19 introduce other bugs. I don't think I would go as far
20 as to say fix 20 and you get 19 new ones, but
21 I understand what you're getting at.
22 **Q.** You understand the point --
23 **A.** Yes.
24 **Q.** -- and the problem?
25 **A.** Yes.

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1 affected; is that what you're trying to say?
2 **A.** I think most issues were -- would -- that occurred were
3 affecting sort of just one or two isolated branches at
4 a time rather than group of branches. I don't think --
5 I think what you're trying to suggest is that there may
6 have been a geographical grouping or something like
7 that. I'm not aware of issues that would affect things
8 like that.
9 **Q.** We know some bugs affected larger numbers and one or two
10 we know that --
11 **A.** Yes, and particularly after a new piece of software got
12 rolled out, there may be some initial teething problems
13 that would get sorted out in a few days after that.
14 **Q.** Right. So there's no geographical suggestion that it
15 would affect a particular group of people, say, in
16 a particular county or something like that?
17 **A.** Not that I can think of.
18 **Q.** It's more about the way the system itself operates and
19 timing issues, you --
20 **A.** And the sort of activities that were being carried out.
21 So there might be specific transactions that could cause
22 issues.
23 **Q.** As regards software updates, you've mentioned in your
24 statements that you believed that the Post Office was
25 aware of those software updates?

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1 **Q.** How open was the Post Office in recognising bugs, errors
2 or defects to the Horizon system, in your mind?
3 **A.** I'm not quite sure what --
4 **Q.** Well, did they seem to be interested, the Post Office;
5 were they welcoming; did they go "Thanks for telling
6 us"?
7 **A.** I wasn't actually involved in that direct communication
8 with Post Office but I -- I think one of the problems is
9 that -- from what I've realised now, looking back, is
10 that Post Office wasn't fully joined up, in that there
11 were some people in Post Office who were well aware of
12 these sort of issues but there were clearly other people
13 in Post Office who weren't.
14 **Q.** Outside of Fujitsu software -- I include within that, if
15 you like, the jigsaw puzzle that was the Horizon system
16 made up of other software from other companies -- so
17 outside of the Fujitsu software, what else, what other
18 hardware or telecommunications could cause data to be
19 lost or corrupted, in your mind?
20 **A.** I think it's a case of -- I'm not quite sure
21 I understand what you're getting at. In terms of the
22 branch accounts, then the branch accounts were all done
23 based on the Horizon system within itself. There were
24 then back-end systems that Post Office then used for
25 running their back-end business and Horizon was

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1 responsible for feeding data into those back-end
2 systems.

3 **Q.** Hardware problems, could that cause difficulties with
4 branch accounts, in other words the terminals
5 themselves? That was capable of causing difficulties?
6 **A.** I suppose, I suppose it could have done but, yeah, I'm
7 not -- err, yeah.

8 **Q.** Now, we know from your evidence and we know from other
9 parts of the evidence in this case that there obviously
10 were these bugs, errors and defects. We know about the
11 support system at Fujitsu, and so on. Help us
12 understand a little bit more about the way that there
13 was communication to the subpostmasters/mistresses and
14 their branches. Was there bug-of-the-day system, or
15 a "Watch out for this, this could affect your system"
16 type notification from Fujitsu?
17 **A.** Not that I'm aware of.
18 **Q.** The people --
19 **A.** Communication with branches, I think, was, in general,
20 Post Office's responsibility, rather than Fujitsu's.
21 **Q.** Well, was anything done within Fujitsu to provide the
22 information in the way that I've suggested? In other
23 words, that "We think it would be a jolly good idea if
24 the people that are operating their small businesses
25 were told about, you know, watch out for this problem";

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1 doesn't work", or something like that. I can take --
2 **A.** I understand that and I understand now that that is
3 exactly what was happening and I wasn't aware of it at
4 the time.
5 **Q.** And this information was not getting through to the
6 support line at Fujitsu; you understand that now?
7 **A.** I understand that now, yes. I didn't at the time.
8 **Q.** That's a problem, isn't it?
9 **A.** Yes, it is indeed.
10 **Q.** Well, explain why it's a problem, Mr Jenkins.
11 **A.** Because then people would -- when there were genuine
12 problems in the system, then we weren't being informed
13 about them and therefore couldn't actually fix them.
14 **Q.** Now, the support lines at Fujitsu were not only just
15 dealing with problems that were let through this Post
16 Office filter system to Fujitsu but they were also
17 seeking within the helplines to identify faults of
18 themselves that would come to their own attention; is
19 that right?
20 **A.** As I understand it, the distinction was that the Fujitsu
21 Helpdesk was primarily dealing with hardware issues and
22 business issues were to be dealt with by NBSC. But if
23 NBSC identified something as being a potential software
24 issue, then it would be passed over to the Fujitsu
25 Helpdesks, is I understand how the system was supposed

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1 was there anything like that being done by Fujitsu?
2 **A.** I'm not aware of anything like that but I wouldn't have
3 been directly involved in any such communication.
4 **Q.** It would have been a good idea, wouldn't it, Mr Jenkins?
5 **A.** With hindsight, yes.
6 **Q.** You've stated a number of times, and I've touched on
7 this in the questions I've asked of you, about the fact
8 that the Post Office didn't support or help, you think,
9 in your mind, the subpostmasters. I'll give you some
10 quotes. Your fourth witness statement, WITN00460400.
11 You state that the NBSC has, for some subpostmasters,
12 not really helped and, in some cases, the advice made
13 things worse.
14 **A.** I understand that, looking back. I wasn't particularly
15 aware of that at the time but it's something I've
16 been -- I've learnt over the course of the last few
17 years.
18 **Q.** You said yesterday, at just 2.32 in the afternoon, that
19 the NBSC didn't handle referrals very well, referrals
20 being from the helpline at Post Office to Fujitsu?
21 **A.** That's something I now understand, yes.
22 **Q.** The problem, which is that if the Post Office isn't
23 handling their helpline very well, that means that
24 subpostmasters can be saying, "Look, I've got a problem.
25 I don't understand what's going on. The system just

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1 to work. But I wasn't actually involved in that side of
2 things then.
3 **Q.** At the very beginning of your evidence, Mr Beer was
4 asking you questions about whether there was a kind
5 of -- this is my summary of the way the questions he was
6 asking you -- but whether there was essentially a big
7 book, a list of problems that you could consult.
8 **A.** The nearest thing I think we had to that was the Known
9 Error Log, which was there to support the Fujitsu
10 Helpdesks but I don't think that was available to the
11 NBSC. But I'm -- I am not 100 per cent certain about
12 that.
13 **Q.** This failure in communication between Fujitsu and the
14 Post Office, this inability, it seems, to reconcile
15 a helpline system that is run by the Post Office with
16 the operation of the Fujitsu system; how on earth could
17 that come about, Mr Jenkins?
18 **A.** I don't know. That wasn't an area that I was
19 particularly involved in.
20 **Q.** Paragraph 51 of your first witness statement,
21 WITN00460100, you say this: you're describing your
22 impression that the Post Office did not provide enough
23 support to subpostmasters who were struggling with the
24 system and that your impression was that Post Office
25 blamed the subpostmasters rather than conducting further

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1 investigations.

2 I think it may be useful if we, in fact, go to that
3 paragraph, paragraph 51, WITN00460100. So the paragraph
4 starts in relation to what POL could have done
5 differently.

6 **A.** I mean, this part of my statement is looking back on how
7 I see things now, not how I necessarily saw things at
8 the time. So this is looking back in 2023, rather than
9 what I was aware of at the time that I was working with
10 Fujitsu.

11 **Q.** "... my impression is that POL did not provide enough
12 support to [subpostmasters] when they were struggling to
13 use Legacy Horizon and Horizon Online. Instead of
14 investigating the issues that [subpostmasters] reported
15 (and trying to assist them), my impression is that POL
16 blamed them instead."

17 **A.** Yes.

18 **Q.** How did you come to this view, Mr Jenkins?

19 **A.** From what I've heard from the Inquiry and what I've
20 learnt from the Group Litigation that took place in
21 2018/2019. It's stuff that I've learnt after my
22 involvement with the design of Horizon. So this is
23 looking back, rather than what I knew at the time.

24 **Q.** Your impression is that POL blamed them instead; blamed
25 them in what way, Mr Jenkins?

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1 **A.** Yeah.

2 **Q.** All right, so let's see if I get this right. The first
3 pre-IMPACT Programme suspense accounts were branch
4 suspense accounts; are you okay with that description?

5 **A.** Yeah.

6 **Q.** After IMPACT Programme, there's then the more
7 centralised suspense accounts; is that again right?

8 **A.** There were still suspense accounts in the branches.

9 **Q.** Okay. Help us with the way the system operated.
10 Fujitsu, is this correct, had access to the Post Office
11 Accounts; is that right?

12 **A.** I'm not quite --

13 **Q.** So could look at what was in the accounts?

14 **A.** I'm not quite sure what you mean. I mean, Fujitsu was
15 able to look at any data that was going through the
16 system.

17 **Q.** Right. Well, it is saying here that, from May 2013,
18 Fujitsu now monitored the suspense account for any such
19 problems?

20 **A.** I don't understand what that means. I don't understand
21 what is being got at by that.

22 **Q.** What it might mean is that the theory was that Fujitsu
23 should keep an eye on suspense accounts to monitor the
24 rise of money being put into suspense which might
25 correlate to problems within the system?

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1 **A.** Back to what you were saying before, that if money was
2 lost, then they were asked to pay up.

3 **Q.** Now, I'm going to ask you about a particular email that
4 was sent on 16 May 2013. I'll ask it to go on the
5 screen, please. Hopefully I've got the right reference,
6 POL00029587. If we scroll down this email, please, this
7 is from Alwen Lyons. Essentially, it says at the top
8 there "Paula", that will be Paula Vennells:

9 "... here are my speaking notes for your call with
10 Alice this afternoon ..."

11 Mr Jenkins, I know you were not privy to this email.
12 I'm going to ask you about one particular section, okay?
13 Now, you'll see as you go down to the bullet points that
14 it gets to the "The Good News is" bit and then if we
15 read across:

16 "The Good News is that where we have found to bugs,
17 [where we have found bugs] since [new Horizon] they have
18 been detected and put right with no loss for the
19 subpostmaster, and Fujitsu now monitor the suspense
20 account for any such problems."

21 All right? Now, this is an email in May 2013.
22 You've given evidence regarding suspense accounts and
23 you, in fact, when giving evidence, I think on the first
24 day, you asked Mr Beer to be careful about the way that
25 the term "suspense accounts" was being used.

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1 **A.** I don't think that's what's behind there. As I say,
2 I don't know what that referring to. There was an issue
3 that was discovered in 2013 to do with some old data
4 from suspense accounts that came forward a year or so
5 later. I think it was being referred to as the local
6 suspense issue, that affected 12 branches on 14
7 occasions, and that was a problem that was detected in
8 2013. So it could be a reference to that.

9 **Q.** All right. Well, I'll move on.

10 Now, you've been asked a number of questions about
11 what you've described in your statement as the
12 boilerplate parts of statements that you gave. Now,
13 I'll take you to a particular paragraph of your
14 statement, WITN00460300, so that's the third witness
15 statement, paragraph 102 -- so WITN00460300,
16 paragraph 102. Right. Thank you very much.

17 So paragraph 102 there is from your statement,
18 you're saying this:

19 "[You're] aware that there is a question in the
20 Inquiry as to what the two 'boilerplate' or 'standard'
21 paragraphs that appear at the very end of the standard
22 Fujitsu witness statement ... actually meant."

23 Okay? That's what --

24 **A.** Yeah.

25 **Q.** -- you're talking about and you've been asked a number

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1 of questions about that.

2 **A.** Yeah.

3 **Q.** I don't want to repeat those questions. Okay?

4 **A.** Okay.

5 **Q.** What I want to do is just understand what's going on

6 here a bit more. Now, you said essentially that this

7 didn't and wasn't meant to mean that the Horizon system

8 was working at any particular level of integrity, that

9 wasn't what this was about; that's what you're saying?

10 **A.** I can't understand how the people who were signing these

11 statements would be in a position to say that.

12 **Q.** Right, okay. The people that you're talking about, that

13 signed these statements, include you?

14 **A.** Yes.

15 **Q.** Yes. Okay. So the people that signed these statements,

16 containing these paragraphs, you're saying you can't

17 understand how they could sign such declarations --

18 **A.** Yeah.

19 **Q.** -- to warranty the integrity of the Horizon system?

20 **A.** Yes.

21 **Q.** Okay, got it. Fine. Now, when you're saying that

22 that's something you don't understand, help us a bit

23 more on that. Are you saying that these two paragraphs

24 you assumed were about the laptop or the computer that

25 you were writing things on, or about the audit data

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1 don't you, Mr Jenkins?

2 **A.** I'm not aware -- I believe that there are some

3 statements that were served in my name that weren't

4 actually signed by me.

5 **Q.** Okay, well, we'll come back to that one in a moment.

6 So when you are making a statement that's got this

7 important declaration at the top, saying that, if you

8 say something in the statement that you know not to be

9 true, that you could be prosecuted, how does that

10 reconcile itself with making an assumption about what

11 these two paragraphs mean? You don't really know,

12 you're just sort of guessing a bit?

13 **A.** I see now that it doesn't necessarily reconcile but I'd

14 not thought that through at the time.

15 **Q.** Just understanding your evidence, I think this has to be

16 true, you are saying that you would never have signed

17 paragraphs that warranted the working integrity of the

18 Horizon system?

19 **A.** I was happy that the Horizon system was working

20 correctly. I wasn't -- I wouldn't have said that it was

21 working correctly everywhere in all particular

22 circumstances but I didn't think that's what I was being

23 asked to say.

24 **Q.** Which is why you're saying you'd have never signed these

25 paragraphs to have meant that --

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1 production? Are you saying that you assumed that or you

2 knew that: which?

3 **A.** Assumed.

4 **Q.** Assumed. Right, okay. Now, help us understand a little

5 bit more about what you mean about this word

6 "assumption", then. You know that giving statements to

7 courts are important things, yes?

8 **A.** Oh, yes.

9 **Q.** You can affect those people's lives that you're giving

10 statements about, those people living in the small

11 businesses in various parts of the country, yes?

12 **A.** Yes.

13 **Q.** You knew that, and you knew that statements contain

14 a declaration at the top saying that "This statement is

15 true to the best of your knowledge and belief".

16 **A.** Yes.

17 **Q.** And you make it knowing that, if you say anything in it

18 that is effectively untrue, or wrong, you may be opening

19 yourself up to prosecution. You know that that's what's

20 on those statements, don't you?

21 **A.** Yes.

22 **Q.** You know you have to sign a statement at the bottom of

23 each page, yes?

24 **A.** In some cases, yes.

25 **Q.** Right. Well, you know you have to sign statements,

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1 **A.** Yes.

2 **Q.** -- and you don't think anybody else should have signed

3 paragraphs to say that the Horizon system was absolutely

4 tickety-boo at all times?

5 **A.** Well, certainly, the people who -- these paragraphs were

6 coming from the statement that was used to exhibit ARQs

7 and the people who were providing those statements

8 didn't have any knowledge of how the Horizon system was

9 working. All they knew was how the ARQ extraction

10 process was working.

11 **Q.** Do you find it a little odd that other people may say

12 that they also assumed that this just meant that they

13 were saying that the system producing the statements was

14 working okay; are you finding it a bit odd that everyone

15 is making the same assumption, without checking with

16 each other?

17 **A.** I realise now that I should have done more investigation

18 and tried to understand more what was being said, but

19 I didn't.

20 **Q.** What about having a natter with somebody like

21 Ms Chambers and saying "What on Earth does that mean,

22 why are we signing this"?

23 **A.** I didn't do that.

24 **Q.** Lastly, if we just touch, just very briefly, before

25 I finish on this entire question of your status as

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1 an expert --

2 **A.** Yes.

3 **Q.** -- giving evidence as an expert. You're saying,

4 essentially, that you know now that it has a different

5 status within the legal proceedings --

6 **A.** Yes.

7 **Q.** -- that experts are allowed to give an opinion about

8 matters to which they have expert knowledge; that's one

9 of the big differences about being an expert. You know

10 that now?

11 **A.** I understand that now, yes.

12 **Q.** Because, otherwise, a factual witness, a witness that

13 just says, I don't know, "I saw a particular person

14 outside of a shop at a particular time", they're not

15 allowed to give an opinion as to what they think is

16 going on, they've just got to say what they've seen; do

17 you understand the difference?

18 **A.** I do now. I don't know if I did fully understand those

19 differences at the time.

20 **Q.** Now through the period of time that we're talking about,

21 there's Google, yes --

22 **A.** Yes.

23 **Q.** -- and we should add that there are other search

24 engines!

25 **A.** Yes.

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1 ignorance rather than maliciousness.

2 **Q.** Looking back in relation to your employer, Fujitsu, what

3 should they have done better?

4 **A.** They should have given me some training in terms of what

5 I -- what they were asking me to do.

6 **Q.** And about the system itself, what should they have done

7 better? You must have thought about this, Mr Jenkins?

8 **A.** Sorry?

9 **Q.** You must have thought about this. What should Fujitsu

10 have done better?

11 **A.** I think the system as a whole was working well but it

12 clearly wasn't working perfectly, and I don't think

13 anyone ever suggested that it was.

14 **Q.** What should Fujitsu have done better, Mr Jenkins?

15 **A.** Probably not put me in the situation that I was put in.

16 **Q.** Lastly, Mr Jenkins, it was at the end of 2020 where, by

17 chance, I happened to be the person that was presenting

18 the evidence that related to the Clarke Advices in the

19 Criminal Court of Appeal, so end of 2020 when that

20 happened.

21 **A.** Right yes.

22 **Q.** That's when the Clarke Advices then started to become

23 part of discussion, generally --

24 **A.** Yes.

25 **Q.** -- in relation to Post Office matters. Now, you were on

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1 **Q.** Did you ever, as an example, Google, the question of

2 giving evidence in court proceedings?

3 **A.** No, I didn't.

4 **Q.** Did you ever speak to somebody else within your team and

5 say, "Well, has anybody ever looked up what we should be

6 doing in court proceedings"?

7 **A.** No, I didn't. Again, I should have done --

8 **Q.** Did you ever ask -- yes --

9 **A.** Again, I should have done but I didn't, yeah.

10 **Q.** Did you ever ask for advice about it?

11 **A.** Well, I did seek some advice in -- with -- from David

12 Jones, for example, back in February 2010, and there was

13 no suggestion that I needed to do anything special at

14 that time.

15 **Q.** So the odd situation that you were in, from your point

16 of view, which is giving evidence in court proceedings,

17 serious evidence affecting people in Post Office

18 branches, you didn't look it up? You didn't speak to

19 other people in your situation, like Ms Chambers, about

20 it; is that right?

21 **A.** Correct.

22 **Q.** Do you think you could have done more to help people in

23 this situation?

24 **A.** I clearly appreciate that now and I appreciate that

25 I did get things very wrong but I -- it was done through

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1 retainer until 2022?

2 **A.** Yes.

3 **Q.** You were saying, essentially, that you weren't doing

4 very much work from about 2020 onwards but you were

5 still theoretically consulting, if possible -- you

6 know --

7 **A.** Yes.

8 **Q.** -- if they wanted you to?

9 **A.** Yes.

10 **Q.** After the time when the Clarke Advices started to become

11 part of the discussion within Post Office Inquiry

12 matters, as it became, did Fujitsu bring you to whatever

13 office and say, "Mr Jenkins, there has been this Advice

14 written by a chap called Simon Clarke that says you've

15 not told the truth or the whole truth to court

16 proceedings"; did Fujitsu bring you in and ask questions

17 of you about that?

18 **A.** They -- I was certainly sent a copy of the Clarke Advice

19 at the time and, after the Horizon trial, I was brought

20 in to discuss with Fujitsu lawyers to give my view as to

21 what had actually, you know, the outcome from the

22 Horizon trial that had happened in 2019, and that was

23 the reason for my last couple of consultancy meetings in

24 early 2020.

25 **Q.** Was there an internal inquiry by Fujitsu into the

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1 question of your integrity, your honesty, your probity,
 2 your credibility, when giving the statements going back
 3 in time for the Post Office?
 4 **A.** Not that I can remember as such, at least not one that
 5 involves me.
 6 **Q.** You've mentioned -- and I'm grateful to Mr Enright --
 7 that there were statements that were served in your name
 8 that weren't actually signed by you?
 9 **A.** Yes.
 10 **Q.** Are those statements that you've seen during the course
 11 of your preparation for your evidence in this hearing,
 12 these hearings?
 13 **A.** Yes, as I say, I can't remember exactly which ones I've
 14 signed and which ones I haven't but I am not using that
 15 as an excuse. It's just that it's been pointed out that
 16 some of the statements that have been shown to me do not
 17 have my signature on them. I'm not saying that I don't
 18 stand by what they say; I'm just saying I -- my
 19 understanding is that some of them were served before
 20 I had actually signed them.
 21 **Q.** Language is important. Your understanding is that some
 22 were served, it seems, without them having been passed
 23 by you, is that what you're saying, or are you saying
 24 that some statements were served in court proceedings
 25 that did not go via you: which?

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1 handing over to Mr Moloney.
 2 **SIR WYN WILLIAMS:** All right.
 3 **Questioned by MR MOLONEY**
 4 **MR MOLONEY:** Thank you, Mr Beer. Thank you, sir.
 5 Mr Jenkins, I've three topics to deal with you,
 6 please. Just to start with a few general questions,
 7 then a very short section on Mr Grant Allen's case and
 8 then the most lengthy section on Mr Khayyam Ishaq's
 9 case.
 10 **A.** Okay.
 11 **Q.** Okay thank you. Just the general questions to start
 12 with. As your services were utilised in more and more
 13 prosecutions, did you become more familiar with the
 14 types of documents prepared for the purposes of criminal
 15 proceedings, such as witness statements, case summaries,
 16 defence statements, and so on?
 17 **A.** I got to recognise a bit more about the type of
 18 documents that I would be shown, so yes, I think that's
 19 a fair comment.
 20 **Q.** Yes. But it's a question rather than a comment, but --
 21 **A.** Well, yes, okay, yes. But yes.
 22 **Q.** Entirely. Did you become more familiar with the
 23 language used by lawyers in such documents?
 24 **A.** I'm not sure that I -- I thought much about the language
 25 used. I was just looking at them in terms of just

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1 **A.** I believe that I saw all of the statements. I'm not --
 2 what I'm saying is I haven't necessarily actually put my
 3 physical signature on the bottom of each one of them.
 4 I'm not -- I'm not trying to distance myself from
 5 statements that were put in my name. All I'm saying is
 6 that I hadn't necessarily actually physically signed
 7 them all.
 8 **MR STEIN:** Thank you, Mr Jenkins.
 9 **SIR WYN WILLIAMS:** Is that it, Mr Stein?
 10 **MR STEIN:** Yes, sir.
 11 **SIR WYN WILLIAMS:** Thank you very much.
 12 So Mr Moloney, is it appropriate to take our second
 13 break now and then you can have your question time after
 14 that break?
 15 **MR MOLONEY:** Yes, please, sir. Thank you.
 16 **SIR WYN WILLIAMS:** Fine.
 17 So we'll start again, well, 12.05. Is that all
 18 right with everyone?
 19 **MR BEER:** Thank you, sir.
 20 (11.52 am)
 21 (A short break)
 22 (12.05 pm)
 23 **MR BEER:** Good afternoon, sir, can you see and hear us?
 24 **SIR WYN WILLIAMS:** Yes, thank you very much.
 25 **MR BEER:** I'll just wait for the room to settle down before

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1 reading them in the same way as I would any other sort
 2 of document.
 3 **Q.** All right. Thank you. Did you become more familiar
 4 with how cases might be conducted, the issues in the
 5 case, and how the defence might seek to resist the
 6 prosecution case and how the prosecution might seek to
 7 rebut what the defence was saying?
 8 **A.** I'm not sure, is the simple answer to that. I've not
 9 done really any sort of comparison as to how things have
 10 changed over time, particularly.
 11 **Q.** Just to try and put it in more simple terms, did you
 12 actually say, "Right, this is the point the prosecution
 13 are making and this is what the defence are saying to it
 14 and this is how the prosecution might rebut that?"
 15 **A.** Yes, I suppose so.
 16 **Q.** When you were involved in a case, writing a report,
 17 meeting with counsel, did you ever consider how a bad
 18 result in the case, a negative outcome on the issues in
 19 the case, might have negative implications for Fujitsu?
 20 **A.** No, I don't think I was considering that particularly.
 21 I was just trying to address the questions that I was
 22 being asked.
 23 **Q.** Right. So you confined yourself, really, to answering
 24 the questions that you were asked?
 25 **A.** Yes.

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1 Q. May I just -- the answer may be obvious because of the
2 answer you've just given but, just to repeat it -- when
3 you were involved in a case, writing a report, meeting
4 with counsel, did you ever consider how a bad result in
5 the case, a negative outcome on the issues, might affect
6 or have negative implications for Post Office?

7 A. No, I didn't really consider that.

8 Q. Okay. I'd now like to ask you just a few questions
9 about Grant Allen's case. He's one of the Core
10 Participants represented by Hudgells Solicitors. Do you
11 have the recollection of this case from having read the
12 papers in preparation for your evidence?

13 A. I've read the stuff about that, yes, as far as the
14 preparation, yes.

15 Q. So I'll just try and give a quick summary and then
16 you'll see if there's anything you disagree with?

17 A. Okay.

18 Q. So in January 2013, Mr Allen plead the guilty to
19 a single count of fraud by false representation. When
20 his branch had been audited, there had been a shortfall
21 of about £17,000 and Mr Allen told Auditors that they
22 would find a shortfall in excess of £10,000. He told
23 Investigators he'd inflated the balance in the branch in
24 order to cover losses he'd experienced and he thought
25 that the shortfall was associated with problems he

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1 A. Sure.

2 Q. "Ishaq -- Having served your report, the defence have
3 queried it and are claiming that Ishaq had to make false
4 entries in order for the figures to reconcile, as the
5 Horizon system kept malfunctioning.

6 "The trial is listed for 25 February 2013 for 3-4
7 days. Please could you make a note in your diary, as
8 you will be needed to attend to clarify our position
9 with Horizon."

10 If we could go down. Thank you:

11 "Our barrister has asked if you could read the
12 Defence Case Statement attached and make a list of your
13 initial thoughts on the assertions that he is making.
14 We may need you to add a few of those comments into your
15 report so that each issue is addressed.

16 "I have attached a copy of the case summary for your
17 assistance."

18 Then it deals with the case of Sefton and Nield,
19 which we don't have to spend any time on, and the usual
20 salutations.

21 A. Yes.

22 Q. We see from that that you were told that Grant Allen's
23 case had concluded --

24 A. Yes.

25 Q. -- and Ms Panter refers to having served your report,

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1 encountered with hardware not functioning properly, as
2 he moved over to the new system; do you remember that?

3 A. I didn't remember it was to do with moving over to the
4 new system; I thought it was to do with moving hardware
5 from one branch to -- one location to another.

6 Q. Absolutely. Now, can we look at POL00089427. That's
7 POL00089427. Can we please go to the final page to
8 start with, so we can scroll up to the penultimate page,
9 and keep going, and keep going. Thank you.

10 It's an email from Rachael Panter to you on
11 31 January 2013 and it follows on, really, in time from
12 an email that Mr Beer asked you about yesterday
13 afternoon when all the cases were set out and your
14 generic statements were going to be served in relation
15 to those cases?

16 A. Yes, I'm familiar with those sort of emails.

17 Q. Yes, entirely. So I'll read it, if I may:

18 "Hi Gareth

19 "Hope you are well. Just to let you know where we
20 are with a couple of cases.

21 "Grant Allen -- this case has concluded now so you
22 will not need to attend."

23 I will deal with what is said about Mr Ishaq here
24 because that will save time when I come to ask you about
25 Mr Ishaq.

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1 which of course follows on from reference in the
2 previous email that we saw about expert reports.

3 A. It was my generic witness statement, I believe, was what
4 was being served.

5 Q. Absolutely, which was described as an expert report from
6 you.

7 A. I thought of it as being an expert witness statement but
8 I won't quibble the terms.

9 Q. Okay. You reply in due course to this email, at 17.01,
10 so not long after. If we could go up the page, please,
11 and there we see:

12 "Rachael,

13 "I'm fine thanks. Hope you are too.

14 "Thanks for the update. I'll make a note of the
15 dates. No problem with them at present.

16 "I'll have a look at the Ishaq stuff and get back to
17 you. When do you need anything? I'm tied up all of
18 next week so I may not be able to get anything
19 formalised until the week of 11 February. Is that
20 okay?"

21 In fact, you were much quicker than that --

22 A. Yes, I found a bit of space in my schedules during that
23 week but, yes, I was trying to set expectations.

24 Q. It's this I'd like to ask you about, Mr Jenkins, if
25 I may. You go on to say:

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1 "What exactly was the conclusion of the Grant Allen
2 case? I was particularly concerned about his
3 allegations regarding the problems caught due to
4 refurbishment and comms issues being the reason for some
5 of his losses. Was anything said publicly about that?
6 We were quite concerned that this might set
7 a precedent."

8 Then you referred to the case of Mr Patel and Kim
9 Wylie, to conclude the email.

10 **A.** Yes.

11 **Q.** Who was "we" there, Mr Jenkins?

12 **A.** I guess it was "we," Fujitsu. I'm not 100 per cent
13 sure, about that would be -- it wasn't a royal 'we', if
14 that's what you mean.

15 **Q.** Well, that was one option, although you'd said "I" in
16 the previous sentence --

17 **A.** Yeah.

18 **Q.** -- which rather precluded it being a royal 'we'.

19 **A.** Yes.

20 **Q.** So it was Fujitsu who were worried. Why would Fujitsu
21 be worried about a precedent being set in a case?

22 **A.** I think it was -- there was a suggestion that
23 a refurbishment had caused a loss and I'd not been given
24 the opportunity to investigate what was actually
25 happening, so I just wanted to sort of clarify exactly

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1 career?

2 **A.** Possibly.

3 **Q.** Can I move on, please, now just to look at the case of
4 Khayyam Ishaq, and could we please put up the case of
5 Hamilton, which has the Inquiry URN POL00113278, and it
6 is paragraph 214. There it is.

7 This is what the Court of Appeal said about the case
8 of Khayyam Ishaq in the judgment Hamilton and others at
9 paragraph 214, and it goes through to paragraph 218 for
10 the facts:

11 "On 7 March 2013, in the Crown Court at Bradford,
12 before HHJ Potter, Khayyam Ishaq changed his plea to
13 guilty to the theft of £17,863. On 22 April 2013, he
14 was sentenced to 54 weeks' imprisonment."

15 So what that means is that it's a sentence of
16 immediate custody, not suspended:

17 "215. The defence challenge to the Horizon system
18 was clear from a very early stage in the proceedings.
19 Mr Ishaq's solicitor had informed [Post Office] of the
20 issue and of the defence intention to instruct an expert
21 at an earlier Magistrates' Courts hearing on 25 July
22 2012. A defence statement of 29 August 2012 repeated
23 the defence challenge to Horizon and made a series of
24 disclosure requests targeted at the Horizon system.

25 "Mr Ishaq denied theft but admitted to altering

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1 what the outcome was, as to whether it needed further
2 investigation.

3 **Q.** Because if a refurbishment had been shown to cause
4 a loss or it had not been challenged that
5 a refurbishment had caused a loss, that might cause
6 problems for Fujitsu?

7 **A.** Potentially, yes.

8 **Q.** Yes. Specifically here, there is a reference to
9 "precedent" and that this perhaps could cause problems
10 in future cases?

11 **A.** Yeah, I guess so.

12 **Q.** Were you involving yourself, as it were, in strategy at
13 this point, Mr Jenkins, and not simply answering the
14 questions that were asked of you?

15 **A.** I didn't see it that way.

16 **Q.** Was there a risk of reputational damage to Fujitsu if
17 this had gone wrong?

18 **A.** I suppose there was a risk there but I was more
19 concerned in actually understanding what had actually
20 happened in that particular case and what the outcome
21 was.

22 **Q.** And what the possible detriment was?

23 **A.** I suppose that may have come into it.

24 **Q.** You were looking ahead with the interests of those who'd
25 been your effective employers for the whole of your

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1 items on Horizon out of necessity in order to reconcile
2 the accounts and due to the system malfunctioning. The
3 defence sought any information relating to the
4 malfunctioning of the Horizon system generally (such as
5 the outcome of any enquiries or investigations or
6 internal memoranda record malfunctioning) and the data
7 produced by Horizon. The defence repeatedly sought
8 disclosure in relation to Horizon and instructed
9 an accountancy expert to analyse the accounts.

10 "[Post Office] produced evidence to demonstrate the
11 integrity of Horizon and relied in particular upon the
12 involvement of Mr Jenkins who provided witness
13 statements and contributed to a joint expert report. In
14 a served witness statement dated 15 January 2013,
15 Mr Jenkins defended the integrity of the Horizon system.

16 "On 5 February 2013, the defence made a formal
17 application to a judge for further disclosure on
18 Horizon. The application was refused. On 20 February
19 2013, the defence served an addendum defence statement
20 which alleged Horizon malfunction and set out reports of
21 technical faults which Mr Ishaq had made to the Horizon
22 Helpdesk. He had also made reports to the National
23 Business Support Centre about shortfalls and
24 discrepancies."

25 Paragraph 219, which is the next paragraph, simply

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1 deals with Post Office's response to the appeal on
2 behalf of Mr Ishaq and points out about the absence of
3 analysis.

4 At the fifth line:

5 "The fact that Mr Jenkins provided witness
6 statements in itself suggested that [Post Office] did
7 not disclose the full and accurate position regarding
8 the reliability of Horizon. There was no proof of
9 an actual loss as opposed to a Horizon-generated
10 shortage."

11 So that's sets the factual background, as it were,
12 to the questions that I'd like to ask you, Mr Jenkins.
13 But just to add a little more, which I think you may
14 recollect of it, from the terms of your witness
15 statement, that Mr Ishaq had pleaded not guilty and was
16 due to be tried on 25 February 2013 in the Bradford
17 Crown Court but, although the trial started, his counsel
18 was not well and so the trial was adjourned until
19 6 March 2013.

20 **A.** Yes, I remember that.

21 **Q.** Then on 7 March he was re-arraigned and pleaded guilty.
22 In fact, you'll remember that because you went to
23 Bradford, didn't you?

24 **A.** On both occasions, I was in Bradford, yes.

25 **Q.** Absolutely. You had served a report in the case and, as
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1 actually explained to me at the time, I was just given
2 the report and said, "Have a look at this, what do you
3 think about it?", or words to that effect.

4 **Q.** Right, because you did produce a joint ...

5 **A.** Yes. Well, I think it was called a joint report.
6 Basically what it was, it was Ms Ibbotson's report with
7 some comments interleaved with it that -- as to whether
8 I agreed or disagreed with what she was saying and, in
9 the event, on the whole, I agreed with most of what she
10 was saying.

11 **Q.** Entirely, and we'll come on to have a look at that
12 shortly. But, as you say, your views in relation to the
13 separate aspects of the report were incorporated into
14 Ms Ibbotson's report, in bold and italics.

15 **A.** Yes.

16 **Q.** We'll see that. First of all, I want to ask you about
17 the defence statement. Now, the essence of Mr Ishaq's
18 sense, as is made clear, was set out in his defence
19 statement and, for these purposes, can we look at
20 a document which contains quotes from his defence
21 statement and your comments upon those quotes.

22 **A.** Yes.

23 **Q.** You're aware of this document --

24 **A.** I know -- I recognise your description of the document,
25 yes.

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1 it says in the judgment in Hamilton and Others, Mr Ishaq
2 had served the defence statement setting out his defence
3 to the case and explaining why he took issue with the
4 prosecution case, and he'd also commissioned an expert
5 report from Beverley Ibbotson supporting his defence,
6 and you had a number of emails with Beverley Ibbotson
7 and did you meet her briefly, as well?

8 **A.** Met her briefly outside of the court on the first day of
9 the first trial but I'd not seen anything to do with
10 that report until that point.

11 **Q.** Yeah. In fact, you got it very late in the day, didn't
12 you?

13 **A.** I got it on the first day -- the morning of the first
14 day of the first trial, yeah.

15 **Q.** Absolutely. When at court, did you meet the prosecution
16 team, trial counsel, Mr Mark Ford?

17 **A.** I believe I must have done.

18 **Q.** The purpose of your email exchanges with the defence
19 expert, Beverley Ibbotson, prior to the part of the
20 trial, just prior to the start of the trial, was in
21 order that you could discuss each other's potential
22 evidence and produce a joint report that identified any
23 points of agreement and identified any differences
24 between you?

25 **A.** That's what I now understand, yes. I'm not sure it was
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1 **Q.** This is POL00059602. We can see this is 1 February
2 2013, 9.31 in the morning. This is when you're
3 essentially commenting on this document.

4 **A.** Yes.

5 **Q.** Yes. We see the introduction explaining what you've
6 been asked to do, so this is about five weeks before
7 trial. If we could move up slightly so we can see the
8 full section on Defence Case Statement. Thank you.

9 So this is the first quote, as it were, from
10 Mr Ishaq's defence statement, reproduced in this
11 document for you to comment on.

12 **A.** Yes.

13 **Q.** Yeah. We see:

14 "This Defence Case Statement sets out in general
15 terms the defence of Khayyam Ishaq and the principal
16 matters upon which issue is taken with the [court]. It
17 is served for no other purpose."

18 It carries on five paragraphs, introducing the
19 Defence Case Statement, which you say:

20 "All of the above appears to be standard legal
21 preamble and doesn't require any comment from me."

22 Reflective of your familiarity with documents of
23 this nature?

24 **A.** Well, it was more a case of I didn't think there was
25 anything technical there and I assumed it was something
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1 to do with the legal side of things that I didn't really
2 fully understand and, as I understood it, I was expected
3 to comment on the technical aspects, rather than the
4 stuff there.

5 **Q.** The next section is "General nature of the defence
6 case", and we see that as the heading. Here we see:
7 "The defendant is charged with theft of £21,168.64

8 ...
9 "Again no comment. I have not seen any of the
10 detail as to how this figure was arrived at.

11 "Note that I have been involved in a previous case
12 where the figure was disputed and was able to show why
13 the defendant had misunderstood the way the system
14 operated, due to the way they were trying to hide the
15 loss."

16 Then at paragraph 7, if you could scroll up a bit,
17 thank you:

18 "The nature of the Defence in relation to this
19 allegation is:

20 "There was no appropriation of monies. The Post
21 Office 'Horizon' software/hardware system had in the
22 past on numerous occasions malfunctioned causing
23 difficulties in reconciling sales, receipt and stock
24 figures. The defendant had reported the same to the
25 Post Office helpline seeking assistance but little or no

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1 wasn't it?

2 **A.** I was aware of, at that stage, one fault that had
3 occurred after the pilot of Horizon Online, because this
4 case was to do with Horizon Online, if I remember
5 correctly, and that was the receipts and payments
6 mismatch issue that I think we discussed a day or two
7 ago, and I was confident that we knew the scope of that
8 and which branches that had actually affected.

9 **Q.** Yes, and it could cause problems that had to be
10 rectified, the system could do that. You knew that from
11 Horizon Legacy and Horizon Online was relatively new,
12 and you knew that any computer system could cause
13 problems which had to be rectified?

14 **A.** Yes, but, as I was saying there, that as we were talking
15 about Horizon Online in this case, that I wasn't aware
16 of any specific problems that would have affected that
17 particular branch.

18 **Q.** You had not, at this stage, examined the data?

19 **A.** And I make that clear at the time.

20 **Q.** But you were nevertheless venturing an opinion that it
21 is one of the other two, without having looked at the
22 data.

23 **A.** But I qualified that as saying that I'd not looked at
24 the data.

25 **Q.** You qualified it before you came to that conclusion

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1 successful assistance was arranged to him despite the
2 said requests."

3 Your response here is:

4 "If the defence can specify some examples of this,
5 I am happy to investigate them. However I would contend
6 that the system doesn't malfunction without leaving some
7 trail to indicate what has happened. Without examining
8 the logs it is difficult to be any more specific.

9 "I think there are 3 possibilities here:

10 "The defendant has not understood of the way the
11 system operates and that the difficulties in
12 reconciliation have been due to the defendant's lack of
13 understanding of the system and the way in which it
14 operates.

15 "The defendant has stolen the money.

16 "There is a fault in the system.

17 "There is no evidence of a fault in the system (and
18 the fact that the system operates without issue in
19 12,000 other branches supports this fact), so I would
20 suggest that it is one of the other two. I can offer no
21 opinion in identifying which is the case. The Post
22 Office helpline is run by Post Office Limited and so
23 I am unable to comment on the assistance it did or did
24 not provide."

25 The system was faulty at times though, Mr Jenkins,

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1 though, didn't you? You first of all said, "I've not
2 looked at the data but I think there are three
3 possibilities here", you say, and the two that it must
4 be are that the defendant must have misunderstood the
5 operation of the system or the defendant was a thief,
6 but you could not say which, and that was before you'd
7 looked at the data.

8 **A.** That's what I say. I had no reason to think there was
9 a problem with the system at that time.

10 **Q.** Without having looked at the data?

11 **A.** I have not -- I'd not been asked to look at the data and
12 hadn't been given the data at that stage.

13 **Q.** You say:

14 "Note that this is a common complaint."

15 What was a common complaint?

16 **A.** The common complaint was that, by then, I was
17 understanding that people were complaining about the
18 NBSC helpline not being very helpful.

19 **Q.** Is that part of your expertise?

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

21 **Q.** If we could move to (iv), please, on this, if we scroll
22 down to (iv):

23 "The defendant contends that upon all core data from
24 the Horizon hardware/software system (used by the Post
25 Office Auditors) being provided to him the defence

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1 should be able to demonstrate that all sales, receipt
2 and stock figures properly reconcile."
3 You say:
4 "Not sure I understand this. Is he asking to see
5 the detailed logs to do his own analysis? If so I would
6 suggest that he may need some help in understanding them
7 and in the past I've worked with defence experts to
8 provide that understanding."
9 You realise that the matters that were being raised
10 were the proper subject of expertise --
11 **A.** Yes.
12 **Q.** -- not something that an ordinary person could be
13 expected to understand?
14 **A.** It was a case of explaining what the logs actually
15 meant, yes.
16 **Q.** Then could we please go down to the disclosure requests,
17 yes, and that's at 11(ii). It reads:
18 "All material to the knowledge of the prosecution in
19 existence (whether in the hands of the prosecution or
20 third parties) that reasonably supports (or is
21 reasonably capable of supporting) the contention that
22 the Post Office Horizon software/hardware system has
23 proved to be unreliable and/or inaccurate and/or
24 unstable and/or susceptible to malfunction and/or
25 otherwise prone to the production of erroneous results."

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1 **A.** But this case was to do with Horizon Online and nothing
2 to do with Riposte.
3 **Q.** Yes. But this was an invitation to set out all you
4 knew, really, Mr Jenkins, wasn't it?
5 **A.** I didn't see it that way.
6 **Q.** Then down to (iv), please. We see there:
7 "The full results (whether provisional or final) of
8 all internal and/or external investigations and/or
9 enquiries and/or reviews (whether instigated by the Post
10 Office or any other body) into the correct functioning
11 of the Post Office Horizon hardware/software system ..."
12 You reply:
13 "Again, I do not have this information but
14 presumably Post Office Limited does. I am aware of
15 an ongoing investigation into this area by
16 an independent 3rd party which is due to report in
17 a couple of months' time."
18 That was the Second Sight investigation, was it?
19 **A.** Yes, yeah.
20 **Q.** When you met with Beverley Ibbotson, or emailed her, did
21 you tell her about the ongoing Second Sight
22 investigation?
23 **A.** No, I didn't know that I needed to.
24 **Q.** Having seen what Mr Ishaq was getting at in this case,
25 meeting with the expert, did you not feel that it might

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1 You reply:
2 "I am not aware of any such material other than
3 previous such challenges."
4 You were aware of material, weren't you, that
5 showed, whether or not it had been fixed, that,
6 actually, the Post Office Horizon software and hardware
7 system has proved to be unreliable and/or inaccurate?
8 **A.** I didn't have -- I was aware that Post Office had been
9 building up material of previous challenges but I didn't
10 have a complete set of that and that's really what I was
11 referring to.
12 **Q.** You knew about the problems during rollout?
13 **A.** But the problems during rollout would have not been
14 relevant because I had found out at what time this
15 branch had actually moved from Legacy Horizon to Horizon
16 Online, and it wasn't operating on Horizon Online during
17 that trial period.
18 **Q.** So you're saying that you've confined yourself to
19 Horizon Online here, and that you've not considered this
20 as a general request about Horizon software and
21 hardware. You've read Post Office Horizon Online
22 software and hardware system?
23 **A.** That is how I was taking that.
24 **Q.** You knew all about the problems during rollout. You
25 knew all about the problems with Riposte.

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1 be appropriate to tell her about what was going on with
2 Horizon at this time, when she was essentially raising
3 accountancy related problems in relation to Horizon?
4 **A.** I can see now that maybe I should have done but I didn't
5 think of that at the time.
6 **Q.** Then, finally for this, at (v):
7 "Any internal memoranda and/or guidance notes and/or
8 other material dealing with the correct or incorrect
9 functioning of the Post Office hardware/software system
10 ..."
11 You say:
12 "I don't believe that I have anything specific that
13 comes in this category. I assume that this is being
14 addressed by Post Office Limited."
15 Didn't you know about the Known Error Log?
16 **A.** That was not -- I'd not interpreted that question as
17 meaning that.
18 **Q.** Well, that identifies incorrect functioning of the Post
19 Office Horizon hardware and software system and gives
20 fixes, doesn't it?
21 **A.** Yes, I accept that now but I'd not seen that as being
22 what this question was about.
23 **Q.** So far as the answers you've given in this document are
24 concerned, did you appreciate that Post Office would
25 rely on your answers?

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1 A. I don't think -- I don't think I heard anything further
2 from when I passed this response back to -- I think it
3 was Cartwright King, rather than Post Office, as such,
4 and I didn't get any further feedback in terms of
5 progressing this any further, that I can remember.
6 Q. Because we know, as we've seen from the terms of the
7 Hamilton judgment, that a disclosure request was made by
8 Mr Ishaq on 5 February, that's just four days after
9 this, which related to that material and the application
10 was refused by the judge.

11 Now, we don't have a transcript of that disclosure
12 application but do you appreciate now that, on the basis
13 of what you said, Post Office would be able to say that
14 it had no material to disclose?

15 A. I'm not sure that that, on the basis of what I said,
16 that they would be able to say that because what I'm
17 saying here is that Post Office probably does have
18 material that I didn't have personally and, therefore,
19 it was up to them as to what they should be disclosing
20 or not.

21 Q. What material were you thinking of, Mr Jenkins? That
22 Post Office would have?

23 A. I didn't know what they had. All I'm saying is that
24 I didn't think that I had anything that was relevant.

25 Q. Well, you're saying that "Post Office probably does have

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1 it. I thought Post Office had that information and they
2 could tell people about it.

3 Q. In any event, matters progressed and the defence served
4 an expert report from Ms Ibbotson and, as you've
5 explained, you had email exchanges with Ms Ibbotson and
6 you met her briefly at court?

7 A. Yes.

8 Q. Could we now, please, have a look at Ms Ibbotson's
9 report and the contributions from you, that are
10 contained therein, the joint statement. This is
11 POL00059927. We can see there it's dated 26 February
12 2013. It's the report of Beverley Ibbotson and the
13 joint statement of Beverley Ibbotson and Gareth Jenkins.

14 Now, I assume, Mr Jenkins, that you read this report?

15 A. I did at the time, yes.

16 Q. Yes. I'd like to take you to particular sections of it,
17 if I may. First to page 4, and paragraph 1.10. Now,
18 there's a part of Beverley Ibbotson's report that says
19 here:

20 "I understand that my duty in providing this report
21 is to the court and this report is addressed to the
22 Court and not to those instructing me."

23 Did you read this as written by Ms Ibbotson?

24 A. That was part of her statement. I was commenting more
25 on the technical aspects that came later.

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1 material that I didn't have personally", are your words
2 and, therefore, it would be up to them --

3 A. I think that's what I'm trying to say here, "Again, I do
4 not have this information but presumably Post Office
5 Limited does".

6 Q. What did you suspect they had?

7 A. I was aware of the work that Helen Rose had done a few
8 months earlier, in terms of cataloguing previous
9 challenges to Horizon.

10 Q. But wasn't that something that you were aware of as
11 an expert, that you should be pointing out here, in
12 terms of the answers to it?

13 A. That was not my material. That was Post Office's
14 material and, when I looked at that, I didn't recognise
15 a lot of the information in there. So I felt the Post
16 Office had a better picture than I had.

17 Q. Why didn't you say, presumably, you'll disclose the
18 Helen Rose Report? You knew about it, Mr Jenkins.

19 A. Well, I assume that Post Office knew about it as well
20 because they were the ones who had shown it to me.

21 Q. Well, precisely. But you were the person who was tasked
22 with being the expert in this case, Mr Jenkins, and you
23 knew about the Helen Rose Report, but you didn't tell
24 anybody.

25 A. I didn't know that I was expected to tell anybody about

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1 Q. No, of course. I'm asking you, though, whether or not
2 you read that?

3 A. I probably read it, yes.

4 Q. Did that inform your understanding of the section in
5 your generic statement that -- where you said,
6 "I understand that my duty in providing this report is
7 to the Court"?

8 A. I don't think I related the two together, at the time.

9 Q. Right. Then, at page 4, please, 1.11:

10 "In accordance with Part 33 of the Criminal
11 Procedure Rules and the Practice Direction supplementing
12 it, I set out my expert's declaration at the conclusion
13 of the body of this report."

14 Did it never occur to you that you might be subject
15 to the same duty?

16 A. It hadn't, until it was pointed out to me much later.

17 Q. When you read that, "in accordance with Part 33 of the
18 Criminal Procedure Rules and the practice directions
19 supplementing it, I set out my expert's declaration at
20 the conclusion of the body of this report", did you not
21 wonder what Part 33 of the Criminal Procedure Rules was
22 and the Practice Direction supplementing it?

23 A. No, as I say, this was all -- the first time that I saw
24 the report was the previous day. I'd spent most of the
25 evening analysing a whole load of data to be able to

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1 address the issues, so that's what I was concentrating
 2 on at this time.

3 **Q.** Can we please go to page 5, please, which is the next
 4 page, and to 2.3. This is really the body of
 5 Ms Ibbotson's report, dealing with the issues in the
 6 case, and what had happened was that essentially there
 7 was an audit, Mr Ishaq was suspended and there was
 8 a difference between the shortfalls from when he was
 9 suspended and a later check?

10 **A.** Yes, yes.

11 **Q.** Of course, you could see the obvious point that's being
 12 made, which is how has this balance changed, this
 13 shortfall, how has it increased, if Mr Ishaq has been
 14 suspended? It reads:
 15 "A repeat balance snapshot exercise was carried out
 16 on 11 February 2011, 3 days after the defendant had been
 17 suspended, at which time the shortfall was identified as
 18 being £21,213.79."
 19 Then what you say is:
 20 "GJ agrees that these exhibits are clearly different
 21 but is unable to explain the differences at this point.
 22 GJ points out, however, that the difference is only
 23 £45.15."
 24 Why did you mention that, Mr Jenkins, about that
 25 figure, that it's only £45.15?
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1 between 9 September 2010 (start of branch trading
 2 statement period 1) and 8 February 2011, which I have
 3 further subcategorised by user ID and by product code.
 4 As my analysis shows of the 248 reversals over the
 5 period, 14 were made by Mr Dennis Watson, following the
 6 audit on 8 February 2011, 173 were carried out under the
 7 usernames associated with Mr Ishaq and 61 reversals were
 8 carried out under the username associated with
 9 Mr Liaquat."
 10 You then say:
 11 "[Gareth Jenkins] agrees that there were 248 items
 12 and with the split on the total basis as above. GJ
 13 points out that if only 4 product lines are analysed (as
 14 SB/21) then other than one transaction all were carried
 15 out by under name KI001 or KIS002. BI agrees."
 16 Was this part of your expertise, to be able to
 17 identify who made the reversals?

18 **A.** I was identifying what the logs said had been done in
 19 terms of the reversals. So I'd been looking through the
 20 transaction logs for the branch for that. As I say,
 21 I can't remember the analysis I did now but I had spent
 22 was of the previous evening going through the logs
 23 looking to see what these reversals were and trying to
 24 marry them up with what was mentioned in the report here
 25 by Ms Ibbotson.
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1 **A.** Because I saw that as being small compared to the
 2 £21,000 that was being talked about and, in the work
 3 that I'd done in a fairly limited timescale, I'd been
 4 unable to sort of track down exactly what -- why that
 5 difference was.

6 **Q.** Wasn't that a matter for comment by the lawyers, rather
 7 than you?

8 **A.** Possibly it was. I don't know. As I say, I don't know
 9 what -- I'd been asked to actually look at this report
 10 and I was agreeing with the fact that the figures were
 11 different, but I was just pointing out that the
 12 difference was only £45.

13 **Q.** Can we go to page 17, please, and to paragraph 3.29.
 14 This case was all about reversals, wasn't it,
 15 Mr Jenkins?

16 **A.** Yes, I think it was. I can't remember all the details,
 17 I'm afraid.

18 **Q.** We see at 3.29, and of course the issue is, a central
 19 issue is, who was responsible for the reversals?

20 **A.** Yes.

21 **Q.** Yeah. We see Ms Ibbotson dealing with that issue and
 22 something which perhaps undermined the assertion that
 23 Khayyam Ishaq had been physically responsible for the
 24 reversals. It reads:
 25 "I have summarised, at Appendix G3, all reversals
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1 **Q.** But that was a fact for the investigator and the
 2 prosecutor, not expert evidence from you, wasn't it;
 3 that's not part of your expertise?

4 **A.** That's what I'd been asked to look at.

5 **Q.** Then, just finally, looking at this report, could we go
 6 to page 19 and the expert's declaration. This is the
 7 expert's declaration that Ms Ibbotson had referred to in
 8 the early part of her report that is in accordance with
 9 Part 33 of the Criminal Procedure Rules and the Practice
 10 Direction. Could we just look at 5.12, thank you. If
 11 we could move all of that up. Thank you very much.
 12 "I understand that ..."
 13 Then at (b):
 14 "... the Court may at any stage direct a discussion
 15 to take place between experts ..."
 16 Did you understand, when you had a discussion with
 17 Beverley Ibbotson, that you were essentially as two
 18 experts discussing the issues in the case?

19 **A.** I was aware that I was there as an expert on
 20 understanding how the Horizon system operated.

21 **Q.** Yes. At (c):
 22 "... the court may direct that, following
 23 a discussion between the experts, a statement should be
 24 prepared showing those issues which are agreed and those
 25 issues which are not agreed, together with a summary of
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1 the reasons for disagreeing."
 2 What did you think your joint statement was about?
 3 **A.** I think it -- I think it was actually -- looking at that
 4 now, I think it was fulfilling what it says at (c)
 5 there.
 6 **Q.** Yes. Then at (f):
 7 "... I have read Part 33 of the Criminal Procedure
 8 Rules and I have complied with its requirements."
 9 Beverley Ibbotson is saying, as part of her
 10 declaration, that she's read Part 33 of the Criminal
 11 Procedure Rules and "I have complied with its
 12 requirements". She says that in the context of it being
 13 mentioned that the court can direct a discussion to take
 14 place between experts and that the court can direct
 15 a joint statement. She says "I have read Part 33 of the
 16 Criminal" -- and she's declared this, "and I have
 17 complied with its requirements".
 18 Did you not wonder whether or not that was something
 19 you ought to have done?
 20 **A.** No, I didn't because, as I say, I was concerned about
 21 analysing the data and commenting on the technical
 22 aspects of the report, and that's all I thought that
 23 I needed to be doing.
 24 **Q.** Did you read this?
 25 **A.** I'm not sure.

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1 established a couple of days ago, I clearly had seen
 2 that letter.
 3 **Q.** All of those documents contained the same or similar
 4 aspects to that which is contained within Beverley
 5 Ibbotson's report. You'd become familiar with the
 6 language of documents, legal preamble, format of
 7 documents. Why did never occur to you that any of this
 8 might apply to you in your role as somebody giving
 9 expert evidence on behalf of, essentially, Fujitsu and
 10 Post Office?
 11 **A.** I don't know. Clearly it should have done but it
 12 didn't.
 13 **Q.** Is it because you knew you could not be -- you couldn't
 14 sign this because you weren't independent, Mr Jenkins?
 15 **A.** I-- I'd just not thought it through.
 16 **Q.** Because you knew that you were part of the prosecution
 17 team battling for Post Office and Fujitsu?
 18 **A.** That's how they were treating me.
 19 **Q.** So you couldn't sign this expert's declaration, could
 20 you?
 21 **A.** I was never asked to.
 22 **Q.** Even if you'd looked at it, you couldn't sign it, could
 23 you?
 24 **A.** Well, I've certainly never seen Part 33 of the Criminal
 25 Procedure Rules and I certainly haven't seen the Code of

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1 **Q.** You read the report but did you -- you're not sure?
 2 **A.** The bit of the report that I was concentrating on was
 3 the analysis of the -- what had been taking place in the
 4 branch.
 5 **Q.** Yes. At (g):
 6 "I confirm that I have acted in accordance with the
 7 Code of Practice for Experts."
 8 Did you ever ask anybody about whether or not there
 9 might be a Code of Practice for Experts?
 10 **A.** No, I did not.
 11 **Q.** You had been party to a joint statement with Charles
 12 McLachlan in Mrs Misra's case, as well, hadn't you?
 13 **A.** Yes, I probably had.
 14 **Q.** Yes. Mr Beer took you to your notes on the expert
 15 report in the case of Wylie?
 16 **A.** He did.
 17 **Q.** You were also looking at that in February 2013, shortly
 18 before you came to consider the work of Beverley
 19 Ibbotson.
 20 **A.** I can't remember the chronology but I won't argue with
 21 you.
 22 **Q.** You'd received a letter from Bond Pearce at the earliest
 23 stages of your work on Litigation Support, before
 24 working on the Castleton case.
 25 **A.** I have no recollection of that, and -- but as it was

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1 Practice for Experts, so on that basis I definitely
 2 couldn't have signed it.
 3 **Q.** Because you were considering matters of strategy, such
 4 as this would have been an unhelpful precedent?
 5 **A.** I wouldn't call that a matter of strategy.
 6 **MR MOLONEY:** That's all I ask. Thank you, Mr Jenkins.
 7 **SIR WYN WILLIAMS:** Thank you, Mr Moloney.
 8 Now, where have we got to? It's -- well, 12.53.
 9 There are potential questions on behalf of Ms Sinclair;
 10 is that correct?
 11 **MR BEER:** Yes, sir. Might I suggest that we break until
 12 1.55 and take those questions then?
 13 **SIR WYN WILLIAMS:** Fine. Certainly, then. That's what
 14 we'll do.
 15 **MR BEER:** Thank you very much, sir.
 16 (12.53 pm)
 17 (The Short Adjournment)
 18 (1.55 pm)
 19 **MR BEER:** Good afternoon, sir, can you hear and see us?
 20 **SIR WYN WILLIAMS:** Yes, I can, thank you very much.
 21 **MR BEER:** Thank you, I think it's Ms Allan on behalf of
 22 Ms Sinclair next.
 23 **SIR WYN WILLIAMS:** Right.
 24 Questioned by MS ALLAN
 25 **MS ALLAN:** Good afternoon, Mr Jenkins, can you see me?

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- 1 **A.** Oh, sorry, right.
- 2 **Q.** Hello. My name is Christie Allan. I represent Core
3 Participant Susan Sinclair, who is a wrongfully
4 convicted subpostmistress and the first to successfully
5 appeal her conviction in Scotland, which only happened
6 in September last year.
- 7 In the various witness statements that you've
8 provided to the Inquiry to date and in your oral
9 evidence this week, you've described the use of
10 case-specific witness statements in cases such as Seema
11 Misra and Hughie Thomas, and you've described the use of
12 generic witness statements in a number of criminal cases
13 thereafter, up until December 2013.
- 14 Am I correct in my understanding that you estimate
15 that you provided witness statements, in one form or
16 another, for approximately 15 Post Office prosecutions
17 in total?
- 18 **A.** I can't remember the number. I thought it was less than
19 that but I won't argue with the figure. It's that sort
20 of order of magnitude.
- 21 **Q.** So thereabouts.
- 22 **A.** Yeah.
- 23 **Q.** 15 or thereabouts?
- 24 **A.** Yeah.
- 25 **Q.** Of these 15 or thereabouts cases, approximately how many

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- 1 **A.** Yes, that's right, yes.
- 2 **Q.** Thank you. Given that the Core Participant who
3 I represent was prosecuted in accordance with the
4 criminal justice system in Scotland, I want to now turn
5 to focus on the position in Scotland. Firstly, what was
6 your understanding of the legal procedure for Post
7 Office Prosecutions in Scotland and the involvement,
8 therefore, of the Crown Office and the Procurator Fiscal
9 Service?
- 10 **A.** At the time I had no knowledge. I do understand that
11 the Scottish system is different from the English one
12 but that's the level of my knowledge, I'm afraid.
- 13 **Q.** Okay, thank you. Is it right to assume that you never
14 provided oral evidence in a Scottish criminal
15 prosecution?
- 16 **A.** Correct.
- 17 **Q.** What was the extent of your involvement in providing
18 evidence in Scottish cases as to the functionality or
19 integrity of Horizon, if any?
- 20 **A.** I don't believe I was involved in any Scottish cases but
21 I can't be 100 per cent sure of that.
- 22 **Q.** On that basis, as far as you're aware, was your generic
23 witness statements, and/or your Horizon integrity
24 reports, relied upon in such cases?
- 25 **A.** Not that I'm aware of.

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- 1 times did you attend court to give oral evidence at
2 trial as an expert witness?
- 3 **A.** Only -- I only gave oral evidence in one case.
- 4 **Q.** Of that one attendance at court, how many times -- or on
5 that one occasion, was your independence called into
6 question, given your employment with Fujitsu, which was
7 commercially contracted by Post Office?
- 8 **A.** I'm not quite sure what you mean by that, sorry.
- 9 **Q.** On the one attendance -- I'll repeat the question -- on
10 the one attendance that you did appear at court, am
11 I right in thinking that your independence was called
12 into question at trial, given your employment with
13 Fujitsu, which was commercially contracted, of course,
14 by Post Office?
- 15 **A.** I'm not sure that it was -- I was just asked was
16 I biased because I worked for Fujitsu, or words to that
17 effect.
- 18 **Q.** So how was the issue of your independence overcome at
19 trial?
- 20 **A.** I'm not quite clear. I was just asked what was my --
21 the fact that I worked for Fujitsu relevant by the judge
22 and I said I didn't think it was, and that was the end
23 of it, as far as I'm aware.
- 24 **Q.** And that's, I think, the point where you were called
25 "the Fujitsu man" at trial?

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- 1 **Q.** Just finally on this topic, to the best of your
2 knowledge, was anyone else from Fujitsu, or indeed Post
3 Office, involved in providing evidence in Scottish
4 cases?
- 5 **A.** I don't know, is the simple answer.
- 6 **Q.** Thank you.
- 7 If we could just move on to another topic, at
8 paragraph 10 of your fourth witness statement, you refer
9 to Post Office's instruction of Second Sight in 2012 as
10 a good thing and state that you believed that
11 an independent review would conclude that Horizon was
12 sound, but they might also provide recommendations for
13 improvements, which you would welcome.
- 14 You also note that you understood the need for
15 an independent review of Horizon, given the criticism of
16 it in the media. Were you concerned by the growing
17 criticisms of Horizon in the media?
- 18 **A.** I wasn't concerned about it. I just wanted -- I felt it
19 was a sound system, and I was -- welcomed the
20 opportunity to actually show that it was.
- 21 **Q.** So, therefore, did you consider the impact of these
22 concerns and public criticisms of Horizon as having any
23 bearing on the witness evidence that you provided in
24 criminal cases, whether in the past or indeed going
25 forwards in considering you carried on your role in

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1 prosecution support until 2013?
 2 **A.** I think the last case I was involved in was about the
 3 same sort of -- I think it was the case of Mr Ishaq that
 4 we talked about this morning, was the time that I first
 5 became involved with Second Sight. So they seemed to
 6 coincide, I think.
 7 **Q.** Would you consider that the impact of these emerging
 8 public concerns and criticism of Horizon had any impact
 9 on the way that you conducted your evidence at that
 10 point?
 11 **A.** No, I just continued to explain what I thought I knew
 12 about the system.
 13 **Q.** Thank you. If we move on, at paragraph 28 of your
 14 fourth witness statement, you state that you recall
 15 suggesting that Post Office should provide information
 16 to Second Sight about the receipts and payments mismatch
 17 bug and the suspense account bug. Given that we're
 18 talking about Second Sight, I assume that you made this
 19 suggestion around the time of Second Sight's instruction
 20 in 2012?
 21 **A.** Yes, I believe so. I can't remember exactly. I think
 22 it was probably 2013 by then, rather than 2012, but yes.
 23 **Q.** By this time, was the existence of these bugs accepted
 24 as being within the common knowledge of Fujitsu and Post
 25 Office, if not the defence teams and the accused?

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1 criminal cases?
 2 **A.** Yes.
 3 **Q.** Thank you. I have just one final question for you. In
 4 your evidence to the Inquiry this week, you were asked
 5 by Mr Beer why, when you were not the lead engineer for
 6 the Post Office Account, nor were you the only one
 7 involved in the maintenance and development of Horizon,
 8 that Post Office relied on you specifically to provide
 9 evidence relating to the integrity of Horizon in
 10 criminal prosecutions? I note that your answer was you
 11 had a fairly good overview knowledge of Horizon, due to
 12 your role on the agent team, your work in middle
 13 account, back end and IMPACT, so you had a detailed
 14 knowledge of how counter operated and a good overview
 15 knowledge of how Horizon worked, but that you were not
 16 the only person who could be used as an expert.
 17 You stated that, despite some email correspondence,
 18 where other names within Fujitsu were suggested, for one
 19 reason or another, it was you in the end that was picked
 20 to support Post Office in this way. Indeed, you
 21 confirmed, when asked by Dave Jennings in 2009, whether
 22 there was anyone else that could cover this activity as
 23 well or instead of you, your answer was:

24 "Should? Then probably yes. Could? Then probably
 25 no."

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1 **A.** Yes, I believe so. I wasn't aware that there was any
 2 secret about them between Fujitsu and Post Office.
 3 **Q.** So why did you feel the need, therefore, to make this
 4 point to Post Office, if Post Office already knew about
 5 such issues and that these were indeed within the common
 6 knowledge?
 7 **A.** I thought they were -- I thought it was a good example
 8 of how we were able to identify a problem, diagnose the
 9 problem and fix the problem, and work out its full
 10 extent.
 11 **Q.** So that would be beneficial for Second Sight's
 12 instruction?
 13 **A.** Yes.
 14 **Q.** Why, when you've maintained throughout your evidence to
 15 the Inquiry this week, that past problems and bugs in
 16 Horizon were not relevant for inclusion in your
 17 case-specific and generic witness statements, nor did
 18 you deem them relevant to the purposes of your Horizon
 19 Integrity Reports, did you now, in 2012 to 2013,
 20 consider these issues relevant to disclose for the
 21 purposes of Second Sight?
 22 **A.** Because I saw this as being a much broader issue and,
 23 again, I was seeing that as good example of how we were
 24 able to diagnose and identify and fix problems.
 25 **Q.** It was a broader issue, as opposed to the disclosure in

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1 Do you therefore consider that you had a monopoly,
 2 in terms of the availability of alternative experts who
 3 were able to speak to the integrity of Horizon, which
 4 effectively contributed significantly, perhaps, to
 5 what's been suggested as the Post Office's over-reliance
 6 on your services in the criminal prosecutions of
 7 subpostmasters, and indeed again in a Group Litigation,
 8 notwithstanding the criticisms of you five years
 9 previously?

10 **A.** No, I disagree with that. There was an example, for
 11 example, at the beginning of February, when I was
 12 getting fairly heavily involved with the case of
 13 Mrs Misra, I was off sick for a few days and there was
 14 a question about, well, if I'm off sick, who could take
 15 my place? And there was an email discussion about
 16 suggesting some alternative names to get involved
 17 instead of me.
 18 **Q.** Out of interest, who were those alternative names?
 19 **A.** I think the name that was mentioned was someone called
 20 Dave Jones.
 21 **Q.** To the best of your knowledge did these get involved
 22 in --
 23 **A.** No, he didn't because I came back from my sick leave
 24 after that. I was only off for about two or three days,
 25 as it turned out, but people didn't know that at the

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1 time.

2 **Q.** But you would disagree that you maybe had the monopoly

3 in terms of experts available to speak to those issues?

4 **A.** Yes.

5 **MS ALLAN:** Okay, thank you, Mr Jenkins. That's the end of

6 my questions?

7 **SIR WYN WILLIAMS:** Thank you, Ms Allan.

8 So Mr Beer, do I take it had those are the questions

9 on behalf of Core Participants, other than any questions

10 to come from Mr Jenkins' own representative?

11 **MR BEER:** That's right, sir.

12 **SIR WYN WILLIAMS:** So, Ms Dobbin, do you want to ask any

13 questions?

14 **MS DOBBIN:** I do sir, if I may.

15 **Questioned by MS DOBBIN**

16 **MS DOBBIN:** Mr Jenkins, as you know, I represent you in

17 these proceedings. I'm going to stand up because you're

18 quite far away from me and it's easier for me to see you

19 if I do.

20 **A.** Okay.

21 **Q.** All right? I hope you can hear me as well.

22 **A.** Yes.

23 **Q.** All right. Mr Jenkins, when I ask you these questions,

24 I'm going to ask you that you try and answer as best you

25 can, unclouded by everything that you know now. Okay?

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1 that, Mr Jenkins?

2 **A.** Yes.

3 **Q.** I think you set out at paragraph 249 -- and perhaps it's

4 easier if I read it -- that:

5 "Until I saw the documents provided to me by the

6 Inquiry, I had virtually no memory of being involved in

7 the civil proceedings between POL and Mr Lee Castleton

8 ..."

9 Yes?

10 **A.** Yes.

11 **Q.** "... bar perhaps one or two conversations."

12 If we go over the page, it sets out that:

13 "The Inquiry has referred me to 27 documents to

14 assist my recall of it but nonetheless I have little

15 memory of my involvement. I am reliant upon these

16 documents to help me to reconstruct what happened. My

17 lawyers have alerted me to a number of additional

18 documents on the Inquiry's database to which I refer

19 below. Having read all of this material, I believe that

20 my actual involvement in the case was fairly limited.

21 I neither signed a witness statement nor gave evidence

22 in court."

23 Yes?

24 **A.** Yes, I agree.

25 **Q.** Is that right, Mr Jenkins: that you don't really have

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1 **A.** Okay.

2 **Q.** I'll ask you to do your best with that. Yes?

3 **A.** So what you're saying is, in terms of what I knew at the

4 time, as opposed to what I know now?

5 **Q.** Yes.

6 **A.** Okay.

7 **Q.** Exactly, Mr Jenkins. The first thing that I wanted to

8 go back and ask you about was the email that you were

9 sent in 2006 in the Castleton case, on 6 June 2006. Do

10 you recollect that?

11 **A.** Is this the one in preparation for the meeting the

12 following day?

13 **Q.** Yes, it is. Exactly. So this is the one where it

14 appears that you were sent the quite technical document,

15 the Part 18 reply, that set out various things that

16 Mr Castleton was particularising in his case. Yes?

17 **A.** Yes, I remember the email you're talking about.

18 **Q.** You know that it also appears that you were sent the

19 letter as well from November 2005. Yes?

20 **A.** I now understand that, yes.

21 **Q.** All right. Now, before I go back to that, I just want

22 to go to your statement, if I may, and this is your

23 third statement, at paragraph 249. I'm going to ask

24 that that be brought up. That's WITN00460300. If we

25 could just go over the page. Thank you. Can you see

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1 very much memory of the involvement that you had in that

2 case?

3 **A.** Correct.

4 **Q.** And that you've been dependent on the documents to try

5 to help you reconstruct, as you say, what happened?

6 **A.** Yes, indeed.

7 **Q.** All right. If we go, just dropping down please, to

8 paragraph 252, and this is just to pick up the thread

9 and orientate you, you set out -- if we see the second

10 line -- that you were:

11 "... invited to attend a meeting with POL's

12 solicitors on 6 June. My lawyers have shown me an email

13 from Brian Pinder dated 5 June 2006. This email

14 attached an agenda for the next day's meeting ..."

15 I think that's what we now know to be the letter,

16 yes?

17 **A.** Yes.

18 **Q.** "... and a scanned extract from a document which

19 recorded issues which Mr Castleton had experienced ..."

20 Yes?

21 **A.** Yes.

22 **Q.** You had set out there:

23 "I probably read both attachments in advance

24 although I don't recall doing so."

25 Is that right?

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1 A. Yes.

2 Q. Okay. So have you any memory, for example, of reading
3 the Part 18 reply or the sort of technical document that
4 was sent to you with that email?

5 A. No, as I say, I have a vague memory of going to
6 a meeting but that's about it, and clearly having read
7 the notes of the meeting, then I clearly, at that
8 meeting, answered some technical questions and that
9 other document attached there seemed to have similar
10 technical questions. So that's all I'm basing my memory
11 on.

12 Q. All right. Now, on the morning that you started to give
13 evidence, so before we knew the correct position about
14 what had been sent with the email, Mr Beer asked you
15 questions about what you would have done if you'd
16 received this letter in 2006. Yes --

17 A. Yes.

18 Q. -- you recollect that? You said -- and if anyone wants
19 the reference it's the transcript for 26 June, internal
20 page 73, line 5 -- that you would have skimmed through
21 it; is that right?

22 A. Yes.

23 Q. All right. I wonder, then, if we could just turn to
24 this document, the email that you were sent ahead of the
25 meeting, and that's FUJ00152601, and I think we've
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1 order to prepare for the meeting the next day?

2 A. I think so, as best as I can work out from what I've
3 seen of what happened at the time.

4 Q. Did you understand that that's why you were being
5 invited to the meeting, to help contribute in relation
6 to that information?

7 A. That is -- yes, I think so, from seeing what is said in
8 the covering email and so on, yes.

9 Q. Exactly. Now I'm showing you these documents to see if
10 I can just put you again, just back in time, Mr Jenkins,
11 but, at the point that you were sent these, had anyone
12 actually mentioned to you that you might be any sort of
13 witness in this case?

14 A. I don't believe so but I can't be 100 per cent sure.

15 Q. There are no emails to that effect, are there?

16 A. Not that I've seen.

17 Q. Had anyone suggested to you that the meeting was to
18 consider whether anyone might be a witness in this case?

19 A. Again, I have no recollection of that.

20 Q. And that's not reflected in the email that you were sent
21 either, is it?

22 A. No.

23 Q. We've seen an attendance note of the meeting, haven't
24 we?

25 A. Yes.

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1 looked at this, Mr Jenkins.

2 A. Yes.

3 Q. Again, it's just to help you orientate yourself in time.
4 We see there:
5 "Please be advised of the email regarding the
6 meeting tomorrow and attachments."
7 Yes?

8 A. Yes.

9 Q. We've seen that and that's the email that directed you
10 towards the scanned document; is that right?

11 A. Yes.

12 Q. If we just look very quickly at this scanned document,
13 please. That's FUJ00152602. If we just scroll through
14 that document, please.
15 Thank you. If we could just keep scrolling through,
16 and keep scrolling through.
17 So I think it carries on, Mr Jenkins, to about
18 page 8, yes?

19 A. That seems to be it, yes.

20 Q. Yes. So I think eight pages of quite, perhaps dense
21 sort of technical information or queries set out; is
22 that right?

23 A. Yes.

24 Q. All right. Is that the document, is that the
25 information that you would have been interested in, in
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1 Q. You've been through that attendance note, I think,
2 haven't you, for preparing --

3 A. Yes, I have.

4 Q. -- for the inquiry. There is no suggestion in that
5 attendance note, is there, that there is discussion
6 about anyone being a witness in that case?

7 A. I can't remember that.

8 Q. All right. Well, perhaps you'll take it from me --

9 A. I'm happy to take it from you, yes.

10 Q. All right. In fact, if we look at POL00071138, this is
11 an email from Mr Dilley the solicitor, and that was sent
12 on 27 June 2006.

13 A. Yes.

14 Q. If we just scroll down a bit to the witnesses of fact,
15 we see your name there, don't we?

16 A. Yes, that's me.

17 Q. Then if we just look at the next line, it says:
18 "We will also have one or two expert witnesses on
19 the IT and accountancy side."
20 Correct?

21 A. Yes.

22 Q. Thank you. It's right, isn't it, when Mr Dilley came to
23 draft a witness statement for you, Mr Jenkins, it was
24 a witness statement of fact, wasn't it?

25 A. I believe so. As I say, at the time I had no concept of
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1 the difference.

2 **Q.** All right. Well, let's have a quick look. FUJ00122284.

3 Perhaps if we could just go to the last paragraph in

4 that witness statement.

5 Okay, we've seen this, this first part of it,

6 Mr Jenkins. You can see it says, "Witness statement".

7 If we go to the last paragraph, please, paragraph 38,

8 that was drafted for you by Mr Dilley, wasn't it?

9 **A.** Yes. Well, I assume so at least.

10 **Q.** I think we know from the emails, Mr Jenkins, that it

11 was.

12 **A.** Yeah.

13 **Q.** That's not in dispute.

14 **A.** Yeah.

15 **Q.** He sets out there what it was that he wanted or he was

16 proposing that you say. Yes?

17 **A.** Yes.

18 **Q.** He sets out -- I'm not going to through all of it:

19 "There are no grounds for believing that the

20 problems Mr Castleton says he experienced with his

21 computer would have caused either theoretical or real

22 losses."

23 Correct?

24 **A.** Yes.

25 **Q.** We can see what you say underneath that:

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1 **A.** Yes, he did.

2 **Q.** In fact you agreed with him that that's what the letter

3 said, yes?

4 **A.** Yes.

5 **Q.** In fact, I think we see, if we go to the letter, that it

6 refers to that twice. I'm going to ask if we go to it,

7 FUJ00152573. I'm going to go to the second place where

8 it mentions it, but if we go, please, to the final page

9 of it, page 3 -- sorry, it's page 14 of the document.

10 If you could just scroll down, please, and if

11 perhaps we could just pause there. So for example, it

12 says at paragraph 7, doesn't it, Mr Jenkins, if we look

13 at the paragraph there, that the report should:

14 "Contain a declaration that it's been prepared in

15 accordance with the Code of Guidance on Expert

16 Evidence."

17 Yes?

18 **A.** Yes.

19 **Q.** If we continue scrolling, please, to paragraph (5). So

20 this immediately under "Duty to the Post Office" it sets

21 out:

22 "In performing all of your duties, for which the

23 client will pay, you will owe a duty to the client to

24 act with the professional standards of skill, care and

25 diligence adhered to by experienced and competent

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1 "Not sure I can agree to this without looking more

2 closely at what has gone on."

3 Correct?

4 **A.** Yes, that's right.

5 **Q.** Then we -- sorry, Mr Jenkins, I didn't mean to cut

6 across you. We can see that it was proposed that you

7 sign that as a witness of fact, correct?

8 **A.** Yes.

9 **Q.** It just says:

10 "I believe the facts in this ... statement are

11 true."

12 Yes?

13 **A.** Yes.

14 **Q.** You can see that. Thank you, that can be taken down.

15 When you were taken to the letter about expert

16 duties, the one from November 2005 --

17 **A.** Yes.

18 **Q.** -- Mr Beer put this to you:

19 "If we scan through the letter just slowly --

20 I think you will have read it carefully overnight -- the

21 letter doesn't refer, would you accept, to the provider

22 of a report from Fujitsu as being an expert witness."

23 Yes?

24 **A.** Yes.

25 **Q.** Mr Beer then took you through the letter, didn't he?

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1 consultants acting as expert witnesses."

2 Correct?

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

4 **Q.** All right. Now, that shows you, doesn't it, Mr Jenkins,

5 that two people can read a document like this, or

6 perhaps skim over it, and miss important points, yes?

7 **A.** Yes.

8 **Q.** Even someone as forensic as Mr Beer can miss that, yes?

9 **A.** Yes.

10 **Q.** Or not understand it, correct?

11 **A.** Yeah.

12 **Q.** All right. I'm just going to ask if that be taken down,

13 please.

14 Now, the Inquiry saw, when it was decided that you

15 wouldn't be a witness in that case, Mr Pinder emailed

16 you on 4 September, didn't he?

17 **A.** Yes, I believe there was an email around that sort of

18 time.

19 **Q.** All right. If we look at FUJ00154733. We didn't come

20 back to this again yesterday, Mr Jenkins, when this was

21 revisited, but if we just look at what it says again, so

22 Mr Pinder is telling you why you're not going to be

23 a witness. Yes?

24 **A.** Yes.

25 **Q.** "He states that although you will probably [be] a good

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1 witness, it is for evidential reasons ..."
 2 Yes?
 3 **A.** Yes, I saw that.
 4 **Q.** You saw that. Then you said:
 5 "Fine (I won't [even] try [and] understand what this
 6 means!)"
 7 Yes?
 8 **A.** Yes.
 9 **Q.** Now, I know this was about 18 years ago, Mr Jenkins, but
 10 again, reading that email now, does it assist you as to
 11 whether, had you read the November 2005 letter, you had
 12 digested its contents or understood it in any way?
 13 **A.** I don't think so because, as I say -- as I say there,
 14 I won't try and understand what that means, talking
 15 about opinion evidence and expert evidence, and it
 16 didn't really have any meaning for me then.
 17 **Q.** All right. Now, you've been asked about what guidance
 18 you sought about being a witness, haven't you --
 19 **A.** Yes.
 20 **Q.** -- in the course of the past few days. I wanted to ask
 21 you about one of the occasions, proximate to this, when
 22 you did ask for guidance. Yes?
 23 **A.** Okay.
 24 **Q.** If we could go, please, to FUJ00152616. If we could
 25 scroll down, please, and scroll down again, please, and
 133

1 but remember that you will have sight of your statement
 2 prior to taking the stand can only be asked questions
 3 specifically about your statement."
 4 Yes?
 5 **A.** Yes, I see that.
 6 **Q.** Was that pretty much the height of the sort of guidance
 7 that you were given about being a witness when you
 8 sought that guidance?
 9 **A.** Yes, I think so.
 10 **Q.** Now, that was in July 2006, yes?
 11 **A.** Yes.
 12 **Q.** So that was a few months after the conference that had
 13 taken place in June 2006, wasn't it?
 14 **A.** Yes, the following month, yes.
 15 **Q.** Again, does that throw any light, Mr Jenkins, on what
 16 you understood about giving evidence in court, do you
 17 think?
 18 **A.** Well, it shows that I didn't have much idea about what
 19 was involved.
 20 **Q.** Right. I'm going to move on, if I may, in time,
 21 Mr Jenkins, to 2010, and to Mrs Misra's case. Okay?
 22 **A.** Okay.
 23 **Q.** Now, some expert reports have been put to you, yes --
 24 **A.** Yes.
 25 **Q.** -- and you've been asked the question why didn't they
 135

1 keep scrolling down. Okay. If we could just stop
 2 there. So this was an email that you were sending to
 3 Ms Matthews; is that right?
 4 **A.** Yes, it looks like that, yes.
 5 **Q.** So one of the Post Office Investigators, correct?
 6 **A.** Yes, as I understand it.
 7 **Q.** If we just look there, we can see that this is an email
 8 about arrangements. Yes?
 9 **A.** Yes.
 10 **Q.** You say to her:
 11 "Do you have any idea as to how much time will be
 12 involved and exactly what is required? I've never been
 13 to court in any capacity and my knowledge of such things
 14 is based on films and TV (which I'm sure are
 15 inaccurate!)"
 16 Yes?
 17 **A.** Yes.
 18 **Q.** If we just scroll up, please, and she answers you and we
 19 can see this is on 12 July, isn't it?
 20 **A.** Yes.
 21 **Q.** We see a couple of paragraphs down:
 22 "All witnesses will have to be present on the 1st
 23 day of trial unless the defence has agreed [their]
 24 statement and don't wish to ask any questions about that
 25 evidence. It's pretty much as you see on the TV really
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1 trigger you to think "Does this all apply to me? Am
 2 I subject to these sorts of duties?" Yes?
 3 **A.** Yes, I've certainly been asked that.
 4 **Q.** I wanted to ask you this: in the years that you provided
 5 support to Post Office and its prosecutions, did those
 6 type of reports ever trigger any lawyer to send to you
 7 formal instructions as an expert in any case?
 8 **A.** I don't believe so.
 9 **Q.** Did those sorts of reports trigger any lawyer to tell
 10 you that the evidence that you were giving was opinion
 11 evidence and that you were therefore subject to those
 12 sorts of duties?
 13 **A.** Not that I can recall.
 14 **Q.** Did they ever trigger any lawyer to tell you that your
 15 response should be in the form of an expert report?
 16 **A.** No, I believe all -- the only things I ever produced
 17 were witness statements.
 18 **Q.** Did they ever trigger any lawyer to sit down with you
 19 and actually explain what expert duties are and what
 20 they mean?
 21 **A.** Not that I can recall.
 22 **Q.** Did they ever trigger any lawyer to explain to you or to
 23 say to you that you were in the same sort of category as
 24 these experts?
 25 **A.** Not that I can recall.
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- 1 Q. Did they ever trigger any lawyer to say to you that your
2 statements ought to bear an expert declaration?
3 A. No, I don't believe they ever did.
4 Q. Did any of that ever happen, Mr Jenkins?
5 A. I don't believe so.
6 Q. In the case of Mr Ishaq, Mr Jenkins, I think it's right,
7 isn't it, that you went to trial on the first day
8 without having been provided with Ms Ibbotson's expert
9 report; is that right?
10 A. That's my understanding of things from looking at the
11 email documentation, and I do recall meeting with her on
12 the first day of the trial in Bradford.
13 Q. It was an accountancy report, wasn't it?
14 A. I believe so, yes.
15 Q. You had to ask Ms Ibbotson for all of the appendices to
16 her report because you didn't have them; that's right,
17 isn't it?
18 A. I believe so. I got emailed the report and I think
19 later on I had to ask her for the appendices so I could
20 try to do some sort of analysis to try and correlate her
21 figures against the ARQ data that I'd happened to have
22 with me because I'd asked for it.
23 Q. All right. The email that sent you her report was in
24 fact a blank email, wasn't it?
25 A. Yes, I believe it was.

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- 1 Q. We've seen, and Mr Moloney asked you about this, that
2 you were also sent a Defence Case Statement in
3 Mr Ishaq's case, yes?
4 A. Yes, that was sort of a week or two before that,
5 I believe.
6 Q. The fact that a lawyer sent you, a witness in a case,
7 the Defence Case Statement, did that make you think that
8 that was all right, that that was the sort of thing that
9 a lawyer could do?
10 A. Yes, I'd been sent Defence Case Statements before. So
11 I thought it was the normal thing to do.
12 Q. Did you think that it was all right to comment on
13 disclosure requests that were being made to Post Office?
14 A. It didn't occur to me to question it.
15 Q. Did you have any responsibility for Post Office's
16 disclosure obligations?
17 A. I didn't think I had.
18 Q. Did anyone properly explain to you the sorts of duties
19 that Post Office owed as a prosecutor?
20 A. No, I didn't understand what disclosure meant or -- and
21 what responsibilities anybody had to do with it.
22 Q. All right. I'm going to move on, then, if I may,
23 Mr Jenkins, to ask you about the boilerplate paragraphs
24 that appear in Penny Thomas' witness statement, yes?
25 A. Yeah.

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- 1 Q. Did you have to work into the night on the first day of
2 trial in order to be able to respond to her report?
3 A. Yes, I think it was about 9.00/10.00 in the evening when
4 I sent my response to her report to her.
5 Q. Did you have to, as I understand it, do a reconciliation
6 exercise --
7 A. Yes.
8 Q. -- overnight, in order to be able to, as it were, agree
9 with her report; is that what you had to do with the
10 material that you'd been provided with?
11 A. Yes, I had to go through the ARQ -- I can't remember all
12 the details now but I didn't start looking at the ARQ
13 data until I'd got that and I'd spent quite a bit of
14 time, both in the afternoon and in the evening, going
15 through the ARQ data to try to agree the figures that
16 she had in her report and try and work out where she'd
17 got her figures from.
18 Q. Did it occur to you, Mr Jenkins, to object or to say
19 that that wasn't a very fair way of treating you, to
20 expect you to come along to a trial on the first day and
21 to do all of that and to be expected to get on top of
22 her report?
23 A. I just thought I'd try and get on with it and do the
24 best that I could with the limited information that
25 I had.

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- 1 Q. All right. So I wanted to start then, if I could,
2 exactly as Mr Stein did, with your statement at
3 paragraph 102. That's your third witness statement,
4 okay? Do you have that?
5 **SIR WYN WILLIAMS:** Did you say page or paragraph 102,
6 Ms Dobbin, sorry?
7 **MS DOBBIN:** Sorry, sir, it's paragraph 102. I apologise if
8 I said that. Page 33.
9 Okay, Mr Jenkins, do you see that?
10 A. I see that in front of me now, yes.
11 Q. All right. I'm not going to read all of this out, I'm
12 just going to ask you to look at paragraph 102. And you
13 see the heading above that, yes?
14 A. Yes.
15 Q. If we just scroll through, you see at paragraph 103,
16 Mr Jenkins, you set out there the understanding on the
17 part of some witnesses to the Inquiry that those
18 paragraphs in Penny's statement were about how Horizon
19 was working, yes?
20 A. Yes.
21 Q. If we go on to paragraph 104, I don't think we need
22 worry about that. If we scan through to paragraph 105,
23 yes --
24 A. Yes.
25 Q. -- and you set out there about why you didn't think they

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1 could give an opinion on the operation of Horizon, yes?
 2 **A.** Yes.
 3 **Q.** Paragraph 106: you set out that their witness statement
 4 was concerned with the production of ARQ data, correct?
 5 **A.** Yes.
 6 **Q.** Now, I want to ask you about this and I'm going to come
 7 on to Mr Thomas' case as well but, if we look at
 8 paragraph 107, you were taken to this. You were
 9 explaining that there was no guidance, as it were, as to
 10 what the standard paragraphs were supposed to mean,
 11 correct?
 12 **A.** Correct.
 13 **Q.** You set out that you could see from the communications
 14 in Mr Thomas' case that you raised a question about
 15 these paragraphs, yes?
 16 **A.** Yes.
 17 **Q.** I'll come back to that and the question or the query
 18 that you raised. If you just read through that.
 19 **A.** Yes.
 20 **Q.** Have you read that to the end of the paragraph, yes?
 21 You set out:
 22 "In Mr Thomas' case, I think my concern was that
 23 I could not include these paragraphs because I had not
 24 extracted the ARQ spreadsheets that my draft statement
 25 was referring to. By this ... I could not speak to the
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1 **Q.** I just wanted to be clear about this, Mr Jenkins. If we
 2 just -- yes, that's fine.
 3 In terms of what you understood the first paragraph
 4 to relate to and what computer it related to, can you
 5 explain that?
 6 **A.** I think it's the computer that's actually doing the
 7 extraction of the audit data. So I think there's
 8 a comment there about the "AW", so that would be the
 9 audit workstation.
 10 **Q.** Where she has said:
 11 "I hold a responsible position in relation to the
 12 working of the [Audit Workstation]."
 13 **A.** Yeah.
 14 **Q.** I just want to ask you about your understanding of that
 15 paragraph and what was meant by it?
 16 **A.** It was to do with the computer, on which she was
 17 actually doing the extraction, working properly.
 18 **Q.** Why did you not think, or what was the basis for your
 19 belief, that she was not speaking to the Horizon system
 20 in that paragraph?
 21 **A.** I didn't feel that she understood the way that the
 22 Horizon system worked at all, so therefore was not
 23 qualified to be able to talk about whether the Horizon
 24 was working or not. That wasn't her background or
 25 expertise.
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1 computer which had extracted the spreadsheets as working
 2 properly. I deal with the contemporaneous evidence
 3 about this ..."
 4 Yes?
 5 **A.** Yes.
 6 **Q.** I just wanted to remind you of the background against
 7 which you were asked questions about this. All right?
 8 **A.** Yes.
 9 **Q.** So I wonder then if we could go to Penny Thomas'
 10 statement and this is at FUJ00122139. If we could go to
 11 the final two paragraphs, please, I think, Mr Jenkins,
 12 you might recognise this. I think Ms Thomas asked you,
 13 and then I think some other people, to look at her
 14 witness statement?
 15 **A.** Yes.
 16 **Q.** Is that right? Sorry, if we could go to the penultimate
 17 page, please. So we see, don't we, those two paragraphs
 18 at the end of her standard statement. Yes?
 19 **A.** Yes.
 20 **Q.** Is that the standard statement by which the ARQ data
 21 would be produced?
 22 **A.** I believe so.
 23 **Q.** I think she's made some notes there, that may not
 24 matter; do you see that?
 25 **A.** Yes, I can see that.
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1 **Q.** If we then go to Mr Thomas' case, it's right, isn't it,
 2 that those paragraphs appeared in a draft of your
 3 statement, yes --
 4 **A.** Yes.
 5 **Q.** -- and we've seen that. Perhaps if we just go to that,
 6 first of all, and look at your comment on it. So this
 7 is FUJ00122204. If we just go to the end of that,
 8 please. Sorry, if we just go up, please. All right,
 9 we've seen this before, yes?
 10 **A.** Yes.
 11 **Q.** Those were your highlighted paragraphs, yes?
 12 **A.** Yes.
 13 **Q.** Just noting what you say there:
 14 "I'm not sure that the yellow bit is true. Can this
 15 be deleted? All I've done is interpret the data in the
 16 spreadsheets that you have emailed to me."
 17 Yes?
 18 **A.** Yes.
 19 **Q.** I'm going to look, then, in a bit more detail about what
 20 your concern was but can you, just before we do, explain
 21 what it was that was concerning you to make that
 22 comment?
 23 **A.** Well, this is saying that I'd actually extracted the
 24 data, which I hadn't.
 25 **Q.** Yes. Do we see, if we go to FUJ00122218, and if we
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1 scroll down a little bit, and if we just look at that
2 second paragraph, Mr Jenkins. So ARQ queries, I won't
3 read them all out:

4 "... requested information in relation to Gaerwen
5 ... I was asked to produce information relating to 'Nil'
6 transactions during the periods specified. I have
7 provided three spreadsheets which I now produce ..."

8 Then I think this is where you make your comment,
9 isn't it?

10 **A.** Yes, so I'm saying I'm not sure about this, I've had
11 nothing to do with producing those spreadsheets.

12 **Q.** "All I've done is make some statements based on what are
13 in the spreadsheets. I assume that Neneh or Penny
14 produced the spreadsheets, but I have no personal
15 knowledge as to what was included with then or what was
16 excluded, [and we've seen this] for all I know you could
17 have typed them up from scratch."

18 Yes?

19 **A.** Yes.

20 **Q.** So it's quite hard to discuss this without having the
21 boilerplate paragraphs in front of us but, perhaps if we
22 go back to FUJ00122204 -- sorry -- and to the final two
23 paragraphs, please.

24 All right. So having looked at that, and your
25 concern as set out in the other -- it's a draft,

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1 well, which was talking about generating the ARQ data.

2 **Q.** Was that something that you could speak to without
3 having undertaken that process yourself?

4 **A.** Well, no, I couldn't speak about generating ARQ data
5 because I had no access to it myself.

6 **Q.** Were the spreadsheets that you were talking about and
7 discussing in this witness statement, had they come from
8 the ARQ data in the first place?

9 **A.** I can't remember exactly what the spreadsheets were but
10 they would have come from the ARQ data. I can't
11 remember exactly what extracts they were.

12 **Q.** All right. I think what -- and this is the bit that
13 I wanted to try and understand, Mr Jenkins, and in fact
14 what you did in order to try and remedy the concern that
15 you had, it appeared from what you were saying yesterday
16 in your evidence that you went to the PEAK system; is
17 that right?

18 **A.** That's what it said in the final version of the
19 statement, so I assume that must have been what I did
20 because I can't actually remember what I did at the
21 time. But the fact that my final version of the witness
22 statement talks about having extracted the information
23 from PEAK, then that must have been what I'd done.

24 **Q.** I think you mentioned yesterday that you obtained the
25 message store from PEAK; is that right?

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1 I think, at around the same time, isn't it, Mr Jenkins?

2 **A.** Yes, yes.

3 **Q.** Again, can you just help us. Having looked that, help
4 us understand, then, when you were looking at the first
5 part of the standard statement, again, just to
6 understand what your concern was in relation to the
7 computer and what computer you were referring to?

8 **A.** I wasn't sure about that. My main concern was with the
9 second part, the second paragraph, rather than the
10 first.

11 **Q.** That was to do with producing the records?

12 **A.** Producing the data, yes.

13 **Q.** All right. In terms of the first part, the improper use
14 of the computer, did you understand that to refer to the
15 Horizon system?

16 **A.** No, I did not.

17 **Q.** Can you just explain why you didn't think that that
18 related to the Horizon system?

19 **A.** Because this was a standard paragraph that I could see
20 had been used by Penny and I knew that she was in no
21 position to talk about how Horizon was working or not.

22 **Q.** When it appeared in your witness statement, did you
23 understand it to be concerned with the production of the
24 material that comprised the ARQ data?

25 **A.** Yes, yes, particularly in relation to the second bit as

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1 **A.** That -- yes, exactly how I did that, I can't remember
2 now, but that's what it said in the statement so that
3 must have been what I did.

4 **Q.** Again, just to try and understand, if you'd got the
5 message store, what is the message store?

6 **A.** The message store is the raw data which is actually put
7 on to the ARQ system from which the ARQ spreadsheets are
8 extracted. So I would have extracted similar sort of
9 spreadsheets from the message store but using tools of
10 my own, rather than the standard tools that Penny and
11 Neneh would have used on the ARQ workstation.

12 **Q.** Can you just, in terms of why -- or was that a more
13 reliable way of obtaining the data than simply relying
14 on the spreadsheets that had been produced for you by
15 someone else?

16 **A.** Thinking about it, it's probably less reliable because
17 the ARQ data in the audit server had a better auditable
18 means of proof that it came from the right place, rather
19 than what I did from PEAK. But I'd not thought that
20 through properly at the time.

21 **Q.** All right. But in terms of what it allowed you to do,
22 did it allow you to look at the kind of preserved
23 record?

24 **A.** Yes, it was the same underlying data that would have
25 been on the audit server that was there on the PEAK

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1 data. So, yes, in terms of extracting the data, it
 2 should have been the same data. It's just that -- yeah.
 3 **Q.** So it allowed you, as it were, to undertake that
 4 process --
 5 **A.** So I could do the extraction process myself, yes.
 6 **Q.** All right. At the time, did that meet your concerns
 7 about --
 8 **A.** Yes, it did, because I'd actually done the extraction of
 9 the data myself rather than relying on Neneh or Penny
 10 doing it on my behalf.
 11 **Q.** All right. Now, I think we know, after all of this
 12 happened, that Ms Matthews then came to take a witness
 13 statement from you; is that right?
 14 **A.** So I understand. I have no actual memory of meeting
 15 Ms Matthews but, clearly, from the various emails around
 16 then, that must have happened, yes.
 17 **Q.** I think we can tell, can't we, that she did come to
 18 visit you to take the witness statement from you?
 19 **A.** I believe so yes.
 20 **Q.** All right. Just a point that we didn't really touch on
 21 in your evidence but I wanted to ask you was why it was
 22 that you were content to take out of the statement the
 23 reference to system failure, yes?
 24 **A.** Yes, okay.
 25 **Q.** Can I just ask you a basic question about that. Was
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1 Horizon system that Fujitsu are aware of. If none could
 2 this be clarified ..."
 3 Yes.
 4 **A.** Yes.
 5 **Q.** Scrolling up to your reply, or the reply that was sent,
 6 you having provided the information. So if we look at
 7 (3), that's where you say:
 8 "This is where I'm reluctant to make a clear
 9 statement. I am aware of one problem where transactions
 10 have been lost in particular circumstances due to
 11 locking issues."
 12 Yes?
 13 **A.** Yes.
 14 **Q.** That question and your answer to it goes to Mr Jones in
 15 Fujitsu, yes --
 16 **A.** Yes.
 17 **Q.** -- Mr Singh --
 18 **A.** Yes.
 19 **Q.** -- from Post Office, Mr Longman, the Investigator --
 20 **A.** Yes.
 21 **Q.** -- and it also went to Mr Tafford as well, didn't it?
 22 **A.** I believe so.
 23 **Q.** You having provided that information, Mr Jenkins, did
 24 any of those individuals respond to that information?
 25 Did anyone ask you, "Could you explain more about, for
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1 what was being referred to as a zero transaction
 2 a failure in the Horizon system?
 3 **A.** No, it wasn't.
 4 **Q.** What was it a failure in?
 5 **A.** It was a failure in the end-to-end banking system. So
 6 the things that I was referring to as system failures
 7 were failures in the communication, either between
 8 Horizon and the banks or between the banks, because, in
 9 effect, when doing a banking transaction, what Horizon
 10 connected to was Link, which then communicated with the
 11 specific bank that was associated with the transaction
 12 concerned. So those response codes would have been ones
 13 that were generated by the banking system, rather than
 14 by Horizon itself.
 15 **Q.** All right, thank you. I'm going to move on, Mr Jenkins,
 16 if I may, to a separate issue and that's the initial
 17 question that you were asked in the case of Mrs Misra.
 18 All right?
 19 **A.** Okay.
 20 **Q.** If we could go, please, to FUJ00152930, at page 2.
 21 All right, we've looked at this, if we could scroll
 22 down, please. Okay, so this is the question that we've
 23 looked at a few times, Mr Jenkins:
 24 "When Gareth completes his statement could he also
 25 mention whether there are any known problems with the
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1 example, the locking problems to which you've referred?"
 2 **A.** I'm not aware of anyone asking for any clarification on
 3 that.
 4 **Q.** Did anyone ask you if they could speak to you about that
 5 in order to understand more about what you were talking
 6 about in respect of the locking issues?
 7 **A.** I don't believe so.
 8 **Q.** Or did anyone ask if they could speak to you about the
 9 process that you undertook to look at the event logs
 10 that you were referring to in that response?
 11 **A.** I don't believe so.
 12 **Q.** Did anyone, for example, in Fujitsu say, "Well, this
 13 question is asking what Fujitsu knows, that might
 14 require a broader response, but that ought not to lie on
 15 your shoulders, for example, Mr Jenkins"; did anyone say
 16 anything like that?
 17 **A.** I don't believe so.
 18 **Q.** Did anyone from Prosecution Support speak to you at that
 19 point in order to discuss or explore with you what might
 20 be required? Was there any of that sort of
 21 conversation?
 22 **A.** I don't believe so.
 23 **Q.** Now, I think it's right, Mr Jenkins, that you insisted
 24 that the data be obtained for Mrs Misra's branch, yes?
 25 **A.** I did.
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1 Q. I think you had to press over a period of about five
 2 weeks or so, maybe longer?
 3 A. It was about a month later that the data became
 4 available.
 5 Q. Now, I think at some point, this is on 4 March -- and
 6 perhaps we can go to this, this is FUJ00153027.
 7 Mr Jenkins, you were sent a number of communications?
 8 A. Yeah.
 9 Q. I don't have time to go to them all, so I'm just going
 10 to go to this one. All right, and if we just scroll
 11 down, please. I think this is from Mr Singh and we just
 12 see set out there:
 13 "Thank you for your email ... What has been
 14 requested [are the] transaction logs ..."
 15 I'm not going to read all of this out, Mr Jenkins,
 16 but if you just read it, the first paragraph --
 17 A. Yes.
 18 Q. -- and then perhaps a bit of the second paragraph, yes?
 19 A. Yes.
 20 Q. Can I just ask you, having received that further
 21 instruction of sort, Mr Jenkins, what did you understand
 22 that your task was, or what you were being asked to do
 23 after that?
 24 A. To respond to the reports that Professor McLachlan had
 25 produced and to make my comment on his theories. Now,

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1 review of NT events."
 2 Yes?
 3 A. Yes.
 4 Q. I just want to start with a general question: how
 5 important are NT events for the purposes of diagnosing
 6 the sorts of bugs at a branch that might cause
 7 discrepancies?
 8 A. That tends to be where you'd find that there would be
 9 a problem.
 10 Q. All right. Did you get the NT events for the whole of
 11 the period under indictment --
 12 A. Yes.
 13 Q. -- 2005 to 2009?
 14 A. I think I'd received those about a week or two earlier.
 15 Q. All right. So a four-year period, yes?
 16 A. I believe so, yes.
 17 Q. All right. What work was done on the NT events,
 18 Mr Jenkins?
 19 A. I think, initially, Anne Chambers had a review through
 20 them and passed me an email of what she had actually
 21 found there, which I then had a look at, and I believe
 22 I looked at the events myself.
 23 Q. All right. Was that exercise confined to just looking
 24 for Callendar Square events?
 25 A. It was looking for anything that looked out of the

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1 that actually talks to rebutting or answering them. My
 2 approach was to just respond to them with what I -- with
 3 what I thought how they reflected on the Horizon
 4 system's operation.
 5 Q. Then at paragraph 1, to look at, as well, "errors within
 6 the Horizon system for the transaction log period"; what
 7 did you understand that --
 8 A. Looking at the associated NT events associated with the
 9 periods for which I had the transaction logs.
 10 Q. All right. I'm just going to try to break that down
 11 a bit. So you received this, yes?
 12 A. Yes.
 13 Q. You understand that you've got to look at the report,
 14 yes?
 15 A. Yes.
 16 Q. And that you need to look at the NT events. Yes?
 17 A. Yes.
 18 Q. Why were you looking at the NT events?
 19 A. Primarily to see whether there was anything in there
 20 that would reflect that something had been going wrong
 21 with the Horizon system in the period for which we had
 22 the NT events.
 23 Q. All right. Now, you said yesterday, and this is at
 24 page 27, line 19:
 25 "I thought that what I needed to do was a thorough

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1 ordinary.
 2 Q. I should ask you the question: did you find anything out
 3 of the ordinary when you did that exercise?
 4 A. I can't be specifically remember that I found anything
 5 out of the ordinary but I'm sure, if I had, I would have
 6 noted it.
 7 Q. All right. Now, it been suggested to you that you could
 8 have looked, for example, at PEAKs or perhaps KELs for
 9 this period as well, in order to look at the ARQ data in
 10 relation to that as well, yes?
 11 A. I believe I did make some enquiries as to what PEAKs had
 12 been raised associated with that branch over that period
 13 but I can't be absolutely certain that did so. But
 14 I believe that I -- it's the sort of thing that I think
 15 I would have done.
 16 Q. All right. Would you have obtained assistance from
 17 looking at other KELs, for example --
 18 A. I --
 19 Q. -- or other PEAKs related to the same broad period of
 20 time?
 21 A. I would tended to have looked at PEAKs rather than KELs
 22 and I was relying on the fact that -- I think we
 23 mentioned at some point the concept of having a master
 24 PEAK, when there was a problem affecting multiple
 25 branches. So, therefore, I thought that a search of

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1 PEAKs looking for the specific branch would identify if
 2 there'd been any problems associate with that branch.
 3 **Q.** Right. Had that check been done?
 4 **A.** I believe so but I can't be absolutely certain.
 5 **Q.** All right. There's been focus about things that you
 6 didn't do in the Misra case. I just wanted to ask you,
 7 if I may, about some of the things you did do, okay?
 8 **A.** Yeah.
 9 **Q.** I'm going to set the NT events to one side.
 10 So you had the transaction logs, yes?
 11 **A.** I did.
 12 **Q.** I think that that came to about 500,000 transactions,
 13 yes?
 14 **A.** Something like that, yes.
 15 **Q.** I think is it right you were looking at that to test it
 16 against Professor McLachlan's hypothesis?
 17 **A.** Yes, I was.
 18 **Q.** Did you also get the raw message store?
 19 **A.** Yes, I did have the raw message store.
 20 **Q.** Did you do some work on that to look at failed credit
 21 card debits, as well?
 22 **A.** I think I did that from the ARQ data, rather than the
 23 raw message store.
 24 **Q.** All right. What about transaction corrections, did you
 25 look at those as well?

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1 **A.** I made a statement -- yes, yes.
 2 **Q.** Having mentioned and said that you had undertaken that
 3 exercise and looked at this statement -- the system
 4 events -- did anyone say at that point "We need to get
 5 a copy of the system events" or "Can you provide those"?
 6 **A.** I don't believe so.
 7 **Q.** So was it a surprise, or had you expected that Professor
 8 McLachlan had been provided with those?
 9 **A.** I was surprised when it came to the trial that he was
 10 asking me for them because I thought that, if he was
 11 interested in them, he would have been given them
 12 earlier but -- which I think is effectively what you're
 13 asking.
 14 **Q.** All right. I understand. All right. So in terms of
 15 all of -- and also, sorry, I forgot to ask you about
 16 this, you did have the PEAK, and that was also provided
 17 to Professor McLachlan as well; is that right?
 18 **A.** The Callendar Square PEAK?
 19 **Q.** Sorry, the Callendar Square PEAK.
 20 **A.** Yes, again, I don't think I provided it to him until the
 21 time of the trial and, again, I was surprised that he
 22 hadn't been given that sort of information --
 23 **Q.** All right?
 24 **A.** -- because he'd been asking about it.
 25 **Q.** You were asked many questions about the PEAK as well, at

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1 **A.** I looked at those again in the ARQ data, and I believe
 2 that I also, at some stage -- I think this may be
 3 a month or two later -- I was sent a spreadsheet from
 4 Mr Longman of the transaction corrections that had been
 5 generated from the back-end POLSAP system, and I did
 6 a self-correlation between the report that he gave me of
 7 transaction corrections and those which appeared in the
 8 message store.
 9 **Q.** All right. Did you look at pouch reversals as well?
 10 **A.** I did.
 11 **Q.** Did you also seek to do an analysis of the daily cash
 12 movements?
 13 **A.** I did.
 14 **Q.** All right. Was that a type of reconciliation exercise?
 15 **A.** It would have been, except for the fact that the daily
 16 cash declarations didn't seem to match at all the sort
 17 of movements of cash within the day and, therefore, it
 18 made it difficult to try and pin down where losses had
 19 actually occurred.
 20 **Q.** All right. Now, just coming back to the Callendar
 21 Square point, you made a statement referring to the fact
 22 that you had checked the system events --
 23 **A.** Yes.
 24 **Q.** -- in relation to that, in March, on 9 March 2010;
 25 correct?

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1 the trial, weren't you?
 2 **A.** I was.
 3 **Q.** All right, well, we will come back to that. Just on
 4 a similar point, Mr Jenkins, may I also ask you about
 5 this: in terms of the ability of Fujitsu engineers to
 6 detect bugs and to be knowledgeable about them, were
 7 there systems within Fujitsu intended to pick up
 8 whenever, for example, unusual events were generated, or
 9 whenever there were bugs that caused discrepancies?
 10 **A.** Yes, there was a group called SMC -- I forget exactly
 11 what it stands for -- but they were monitoring events
 12 from the overall system both at the counters and the
 13 data centres, and they were monitoring these 24 hours
 14 a day, seven days a week. It was the only part of the
 15 operation that actually operated on a 24/7 basis.
 16 **Q.** So was that part of the systems in place then, by which
 17 Fujitsu knew and understood about bugs in the system?
 18 **A.** It was, yeah, yeah.
 19 **Q.** All right. In terms of all of the work that you did
 20 over the years working on the Horizon system, are those
 21 the sorts of mechanisms that you were familiar with and
 22 knew about?
 23 **A.** I knew about them. I don't know that I knew the detail
 24 of exactly what was going on but I was aware that these
 25 sort of things were in place.

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1 Q. In terms of the work that you were doing, were Fujitsu
2 systems picking up whenever things were going wrong, or
3 discrepancies were arising?
4 A. That was my understanding and that was the purpose of
5 this sort of monitored, yes. And there were also
6 reconciliation systems in place that were picking up,
7 for example, failed banking transactions and things like
8 that. And there daily reports being produced that were
9 being monitored and checked for, and there was a group
10 that actually did that on a -- daily checks and things
11 like that.
12 Q. All right, so these are systems in place, yes --
13 A. Yes.
14 Q. -- as opposed to sort of conversations with people --
15 A. Yes.
16 Q. -- about whether or not bugs might come to light?
17 There's been a focus, Mr Jenkins, on what your state
18 of mind was during the time, particularly in Mrs Misra's
19 case, yes --
20 A. Yes.
21 Q. -- and how you approached prosecutions. I want to ask
22 you about the information that you provided to Professor
23 McLachlan, and if we can go to FUJ00153157, and if we
24 could go to page 2 of that, please. If we could just
25 scroll up, please. Okay, sorry, if we could just go up.

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1 McLachlan with that information, yes?
2 A. Yes, I believe so.
3 Q. If we scroll up, and keep scrolling up, please, and if
4 we just scroll down a bit, please. Thank you -- sorry,
5 if we could go to the body of that email. Sorry, yes,
6 thank you. If you keep it there.
7 So this is Ms Thomas reflecting the views that, or
8 reflecting why it is or how it came to pass that you
9 provided that information; is that right?
10 A. Yes, I believe there's a separate email in which most of
11 that text has been cut and pasted from, from me to Penny
12 Thomas.
13 Q. I'm just going to look at page 3, "System Change
14 Requests".
15 "Basically he was asking to look at all system
16 faults. I suggested that as we kept all testing and
17 live faults in the same system, and there was around
18 200,000 of them, then that wasn't going to get him very
19 far."
20 Yes?
21 A. Yes.
22 Q. So just to be clear about this, Mr Jenkins, you told
23 Professor McLachlan not just about the Known Error Log
24 but you told him that there were 200,000 faults on this
25 system, yes?

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1 Sorry, keep scrolling down, I apologise. Thank you. If
2 you keep scrolling until we get to Jarnail. Thank you.
3 So Mr Jenkins, this was an email that was sent by
4 Ms Hogg on 22 July 2010, yes?
5 A. Yes.
6 Q. "As a result of the meeting that took place between
7 Charles McLachlan and Gareth Jenkins as directed by the
8 judge, we now need to have:
9 "access to the system in the Midlands ..."
10 Yes?
11 A. Yes.
12 Q. "... access to the operations at Chesterfield ..."
13 Yes?
14 A. Yes.
15 Q. "... access to the system change requests ..."
16 Yes?
17 A. Yes.
18 Q. "... Known Error Log ..."
19 A. Yes.
20 Q. "... and new release documentation to understand what
21 problems have had to be fixed."
22 Yes?
23 A. Yes.
24 Q. So I think we can tell from that, can't we, Mr Jenkins,
25 that you were the person that provided Professor

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1 A. In effect, though many of them were from the testing
2 systems, and so on, but that's really a reference to the
3 PEAK system.
4 Q. So you were quite clear with him, weren't you, that
5 those were the sorts of numbers of fault in the testing
6 and live system, yes?
7 A. Yes.
8 Q. Do you understand, then, that the defence applied to get
9 disclosure of those materials from Post Office?
10 A. That's what this email chain seems to be showing, yes.
11 Q. I think it's right, it's not contentious, that Post
12 Office refused that, yes?
13 A. So I understood.
14 Q. I think you can see from your paragraph at the end that
15 he's "fishing"; you don't personally support the
16 requests but they seem "harmless", yes?
17 A. Yes.
18 Q. So you didn't see any harm in he being able to obtain
19 the information that was set out or --
20 A. No.
21 Q. -- the access that he wanted --
22 A. Yes, I didn't see any need to stop him actually looking
23 at that sort of information, no.
24 Q. I think it's right that Fujitsu did start a scoping
25 exercise in order to be able to explain, or to be able

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1 to set out, all of the changes that had been at the
 2 counter; is that right?
 3 **A.** Yes, we came up with a cost for actually doing that but
 4 it would appear the Post Office had already, by the --
 5 long before we'd actually done that costing exercise,
 6 Post Office had rejected the requests.
 7 **Q.** All right. But, again, was there any problem with
 8 putting that information together and providing it, if
 9 Post Office had wanted that to happen?
 10 **A.** Well, there was a problem in terms of time and effort
 11 for doing it but there wasn't a technical problem in
 12 terms of actually providing that information, and, in
 13 fact, Post Office should have had all that information
 14 themselves anyway because all these change requests
 15 should have been signed off by Post Office at the time.
 16 **Q.** All right. Thank you.
 17 Right. I'm going to turn then, if I may, to
 18 a different subject, Mr Jenkins --
 19 **SIR WYN WILLIAMS:** Ms Dobbin, I understood from Mr Beer that
 20 around about an hour was a reasonable estimate of your
 21 questioning. I think you've probably had a generous
 22 hour. Can you give me some idea of what you have in
 23 mind?
 24 **MS DOBBIN:** Sir, I'm almost finished. It's probably just
 25 about ten minutes more.

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1 Mr Jenkins; I don't have time to go through all of it.
 2 I am just going to pick out some bits, if I may. So if
 3 we look at page 58, and go to the letter D. We looked
 4 at this yesterday, Mr Jenkins, and this is the bit where
 5 you set out that you were doing a high level analysis,
 6 yes?
 7 **A.** Yes.
 8 **Q.** Was this you being candid and open about this sort of
 9 investigation that you had carried out, yes --
 10 **A.** Yes.
 11 **Q.** -- that you couldn't exclude, is that right --
 12 **A.** Correct.
 13 **Q.** -- that there was a computer issue, correct?
 14 **A.** Correct.
 15 **Q.** I think we can see, if we go on, first of all if we look
 16 at page 91. Sorry, if we start at page 90 at letter G.
 17 You explained, didn't you, and you were questioned about
 18 the fact that you didn't know about the Callendar Square
 19 bug at the time, correct?
 20 **A.** Correct.
 21 **Q.** If we go over the page, you explained, didn't you -- we
 22 can see that from letter A -- that you wouldn't know
 23 about every call that's been raised, yes?
 24 **A.** Correct.
 25 **Q.** And accepting that Callendar Square was the failing by

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1 **SIR WYN WILLIAMS:** All right, okay, that's fine.
 2 **MS DOBBIN:** Mr Jenkins, I want to ask you then about the
 3 evidence you gave when it came to Mrs Misra's trial.
 4 **A.** Okay.
 5 **Q.** I'm just going to pick up the transcript and ask if we
 6 go to that, please. That's at POL00029406. All right,
 7 if we could go -- and let's just orientate ourselves.
 8 We can see that this is the transcript, Mr Jenkins,
 9 yes --
 10 **A.** Yes.
 11 **Q.** -- of 14 October?
 12 **A.** Yes.
 13 **Q.** If we just go, please, to page 8. We saw a little bit
 14 of this yesterday but we didn't go the full way down
 15 this page but, if we just look at C, you were being
 16 asked, weren't you, "Can a computer system be perfect",
 17 yes?
 18 **A.** Yes.
 19 **Q.** If we go, please, to page --
 20 "Can a computer system be perfect?"
 21 You were saying:
 22 "No, I don't think so."
 23 Correct?
 24 **A.** Correct.
 25 **Q.** That's something that the transcript comes back to,

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1 the computer, yes --
 2 **A.** Yes.
 3 **Q.** -- by the Horizon system?
 4 **A.** Yes.
 5 **Q.** Now, I won't go on with that but you were questioned
 6 about that and about it not being the fault of the
 7 subpostmaster. Yes?
 8 **A.** Yes.
 9 **Q.** If we go to page 94, this is where we see you being
 10 questioned about the PEAK --
 11 **A.** Yes.
 12 **Q.** -- in Callendar Square, yes?
 13 **A.** Yes.
 14 **Q.** I think that goes on for some time, yes?
 15 **A.** Yes.
 16 **Q.** If we go to page 96, you were also asked questions about
 17 the Known Error Log as well, yes --
 18 **A.** Yes, I am.
 19 **Q.** -- at letter C. At 106 -- this goes on for some time,
 20 this topic -- from line F onwards, we can see the
 21 reference to the Callendar Square PEAK, can't we?
 22 **A.** Yes, it seems to be.
 23 **Q.** "A few of these errors seem to occur every week at
 24 different sites. So it's not just isolated ..."
 25 Yes?

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1 A. I'm not quite sure where we are on that.
 2 Q. I'm so sorry. Letter G.
 3 A. Yes.
 4 Q. That's taken from the PEAK, isn't it?
 5 A. Yes.
 6 Q. That's what you're being questioned about?
 7 A. Yes.
 8 Q. Again, coming back to the idea it's been generated by
 9 the computer, yes?
 10 A. Yes.
 11 Q. If we look at page 123, again, I think you were asked
 12 questions, we can see, if we look at letters E and F --
 13 A. Yes.
 14 Q. -- yes -- that there could be problems that you weren't
 15 aware of, yes?
 16 A. Yes.
 17 Q. If we go to 124, please, and if we look at the letter
 18 E., and you say in your evidence, don't you, Mr Jenkins,
 19 that you couldn't even say. I'm just looking at the
 20 answer:
 21 "I've no way of knowing whether any money loss was
 22 due to theft. I don't even know that money was lost."
 23 Yes?
 24 A. Correct.
 25 Q. Indeed, I think at page 114, that you also agreed about
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1 a total of five witness statements, at least two of
 2 which can properly be described as extremely detailed,
 3 and thank you very much for giving oral evidence over
 4 four days.
 5 So we will adjourn now until Tuesday, when we will
 6 hear from Mr Parker. 9.45 as usual, Mr Beer?
 7 MR BEER: That's right, sir. I think there might be
 8 an amendment to that. It might be -- and we'll discuss
 9 this at the end of the day with you, I suspect -- that
 10 only one day is required and that day may be Wednesday.
 11 So the Core Participants and the public interested in
 12 the proceedings should keep an eye on their emails and
 13 the website respectively, just in case there is
 14 an update.
 15 SIR WYN WILLIAMS: All right. Well, I look forward to
 16 further discussions with you about it.
 17 MR BEER: Yes. We will speak in a moment, sir.
 18 SIR WYN WILLIAMS: Fine.
 19 MR BEER: Thank you.

20 (3.20 pm)
 21 (The hearing adjourned until 09.45 am on
 22 Tuesday, 2 July 2024)
 23
 24
 25

1 defence questions about mismanagement of the branch as
 2 well. So if we look at the very bottom of page 114,
 3 that there would appear to be mismanagement to the
 4 financial running of this Post Office. You agreed and
 5 said:
 6 "That's certainly what it looks like."
 7 Yes?
 8 A. I've not quite got to -- which letter are we at?
 9 Q. I'm so sorry. Bottom of page 114.
 10 A. And then it goes over the page, are we?
 11 Q. The top of page 115, please.
 12 A. Yes.
 13 Q. Do you agree, Mr Jenkins, that at a number of points --
 14 and I'm afraid I can't go through the whole of the
 15 transcript -- might be thought that you gave evidence
 16 that wasn't helpful to the prosecution case.
 17 A. Indeed.
 18 MS DOBBIN: Can you see that?
 19 Thank you, if you wait just one moment.
 20 Thank you, sir, I'm grateful for being able to ask
 21 questions.
 22 SIR WYN WILLIAMS: Thank you.
 23 Mr Beer, is that it?
 24 MR BEER: It is.
 25 SIR WYN WILLIAMS: Well, thank you, Mr Jenkins, for making
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