

Friday, 3 March 2023

1  
2 (10.00 am)  
3 **MR BEER:** Good morning, sir. Can you see and hear me?  
4 **SIR WYN WILLIAMS:** Yes, I can, thank you.  
5 **MR BEER:** May I call Andrew Winn, please.  
6 **ANDREW FRANK WINN (affirmed)**  
7 **Questioned by MR BEER**  
8 **MR BEER:** Good morning, Mr Winn. My name is Jason Beer and ,  
9 as you know, I ask questions on behalf of the Inquiry.  
10 Can you give us your full name, please?  
11 **A.** Andrew Frank Winn.  
12 **Q.** Thank you. Many thanks for coming to give evidence to  
13 the Inquiry today and for the provision of two witness  
14 statements. Can I deal with your first witness  
15 statement first, please. It should be in the hard copy  
16 bundle in front of you at tab A1. It's 24 pages in  
17 length and is dated 26 December 2022. Do you have that?  
18 **A.** Yes.  
19 **Q.** For the transcript the URN is WITN01090100. Can you go  
20 to the 24th page of it, please.  
21 **A.** Yes.  
22 **Q.** Is that your signature?  
23 **A.** Yes.  
24 **Q.** Are the contents of that witness statement true to the  
25 best of your knowledge and belief?

1

1 individual subpostmasters, as that will be a matter  
2 addressed in Phase 4 of the Inquiry, or in relation to  
3 investigations that took place after the scandal broke.  
4 That may be addressed in Phase 5 of the Inquiry and you  
5 may be recalled within it. There may be some questions  
6 that do touch on those matters but only where it's  
7 necessary to understand and explore your evidence on  
8 Phase 3 issues. Do you understand?  
9 **A.** Yes.  
10 **Q.** Thank you. Can I start with your background and  
11 experience. I think you worked for the Royal Mail Group  
12 and then the Post Office for 20 years between 1996 and  
13 2016; is that right?  
14 **A.** That's correct.  
15 **Q.** Have you any professional qualifications that are  
16 relevant to the issues that we're considering today?  
17 **A.** No.  
18 **Q.** You say in your witness statement that you started  
19 working for the Post Office or Post Office Limited in  
20 around 2001. Before that time, what was your role  
21 within Royal Mail Group?  
22 **A.** I started off as a postman, part-time postman. Then  
23 I worked in a management reporting role. Then I worked  
24 in an audit role and, from there, I moved into Post  
25 Office Limited.

3

1 **A.** Yes.  
2 **Q.** Thank you. A copy of that witness statement will be  
3 uploaded to the Inquiry's website and therefore I'm only  
4 going to ask you questions about selected parts of it.  
5 Can we turn to the second witness statement, please.  
6 That's four pages in length and was signed by you today.  
7 Can you look at the fourth page, please, and tell me  
8 whether that's your signature?  
9 **A.** Just give me a moment. I'm struggling with my folder  
10 here. Sorry, where is it?  
11 **Q.** I think it's immediately after the first witness  
12 statement.  
13 **A.** Yes.  
14 **Q.** Is that your signature on the fourth page?  
15 **A.** Yes.  
16 **Q.** The URN for that is WITN01090200. Are the contents of  
17 that witness statement true to the best of your  
18 knowledge and belief?  
19 **A.** Yes.  
20 **Q.** Thank you very much.  
21 I'm going to ask you, Mr Winn, questions about the  
22 matters that arise in what we in the Inquiry are calling  
23 Phase 3 of the Inquiry.  
24 I'm not going to ask you any detailed questions  
25 today about cases involving the prosecution of

2

1 **Q.** What was the audit role?  
2 **A.** Initially it was with Parcelforce, which largely  
3 involved checking out individual branches, depots,  
4 checking the records, et cetera, and then we moved into  
5 a group audit. It consolidated into a group audit and  
6 that would involve going into all the different areas of  
7 the business, usually in groups and carrying out audits  
8 of what was going on there.  
9 **Q.** Before 2001, before you took up your role in the Post  
10 Office in 2001, did your role require you to have any  
11 involvement with the Horizon System?  
12 **A.** No, I believe not.  
13 **Q.** Before you took up your role in the Post Office in 2001,  
14 what did you know, if anything, about the Horizon  
15 System?  
16 **A.** Nothing.  
17 **Q.** If you can just maybe move forward slightly so that the  
18 microphones pick up your voice. You will see that the  
19 Chairman is listening remotely and the proceedings are  
20 broadcast and so it's really important that the  
21 microphones pick up what you say.  
22 **A.** Okay, sorry.  
23 **Q.** So the answer was "Nothing" I think.  
24 **A.** Correct.  
25 **Q.** Thank you. So does it follow that before you took up

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1 your role in 2001, you didn't know anything about  
 2 whether there existed any bugs, errors or defects in the  
 3 Horizon System?  
 4 **A.** Correct.  
 5 **Q.** Now, you joined Post Office Limited, you say in your  
 6 statement, in 2001 in the Network Improvement Team.  
 7 **A.** Yes.  
 8 **Q.** What was your job title in the Network Improvement Team?  
 9 **A.** I can't remember.  
 10 **Q.** What was your function in the Network Improvement Team?  
 11 **A.** A little bit, as the name suggests, trying to find ways  
 12 of improving the performance of the team. I was  
 13 particularly involved in an activity based costing  
 14 exercise, trying to pull together activity based costing  
 15 to help make decisions and, in truth, it ended up being  
 16 too high a level to have much effect.  
 17 I also got involved with the -- I can't remember  
 18 what it were called but, basically, where you get  
 19 mystery shoppers going into branches. So I was involved  
 20 in creating the questions and writing -- and that  
 21 changed every month, so that would be part of my job.  
 22 **Q.** What level within the Network Improvement Team were you?  
 23 **A.** In terms of tiers, you mean?  
 24 **Q.** Well, were you at the lowest rung in the ladder? Would  
 25 you a supervisor, if there were such things? Were

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1 seen an email which suggests that it was earlier than  
 2 that because it refers to you being in that team in at  
 3 least 2003?  
 4 **A.** Yes.  
 5 **Q.** What was your job title in the problem management team?  
 6 **A.** Problem management team leader.  
 7 **Q.** What was the function of the problem management team?  
 8 **A.** As I understand, it was a response to basically the Post  
 9 Office moving onto an IT-type platform, rather than  
 10 a manual-type platform, and it was part of the kind of  
 11 plan that was laid out that, effectively, the concept  
 12 was that anybody within the Post Office who got  
 13 a problem reported it to the problem management team.  
 14 In reality, it should have been just an IT  
 15 function but the way it was set up was that everyone who  
 16 had a problem reported it in there. The IT kind of  
 17 structure at the time was that the problem management  
 18 team managed the problem in terms of making sure the  
 19 relevant people were involved in correcting the problem,  
 20 rather than actually resolving the problem themselves,  
 21 which I found a difficult concept to deal with.  
 22 **Q.** So it was like a signposting service, was it?  
 23 **A.** Yes, that's correct.  
 24 **Q.** Did you manage a team?  
 25 **A.** I did, yes.

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1 a manager? Were you the head of the unit?  
 2 **A.** I was manager without anybody to manage. So I was what  
 3 would be a CM2 grade, I believe. So there was an admin  
 4 officer, who would be the admin grade, but then I think  
 5 there was probably one person same grade as me and then  
 6 three or one senior manager grades with a team leader on  
 7 top of that.  
 8 **Q.** To whom did you report?  
 9 **A.** One of the senior managers.  
 10 **Q.** You didn't manage a team?  
 11 **A.** No.  
 12 **Q.** How many people were in the Network Improvement Team?  
 13 **A.** Seven or eight.  
 14 **Q.** Where was it based?  
 15 **A.** In Chesterfield.  
 16 **Q.** Did your role in the Network Improvement Team require  
 17 you to have knowledge of and understanding of the  
 18 operation of the Horizon System?  
 19 **A.** No.  
 20 **Q.** In the course of that role, did you acquire any  
 21 knowledge about whether there existed any bugs, errors  
 22 or defects in the Horizon System?  
 23 **A.** No.  
 24 **Q.** You say in your witness statement that you moved to the  
 25 problem management team in 2005. I think you've since

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1 **Q.** How many people were in that team?  
 2 **A.** There was probably, I think, about 12 other team  
 3 members.  
 4 **Q.** To whom did you report?  
 5 **A.** A senior manager.  
 6 **Q.** Who was that?  
 7 **A.** Initially, it was Marie Cochate but she left. I can't  
 8 remember who took over from there.  
 9 **Q.** Where were you based?  
 10 **A.** In Dearne House.  
 11 **Q.** Which is?  
 12 **A.** Near Barnsley.  
 13 **Q.** Did that role and the role of the team that you managed  
 14 require knowledge of and understanding of the operation  
 15 of the Horizon System?  
 16 **A.** Yes, but I didn't have knowledge of the Horizon System.  
 17 So I would have said I was a bad placement into that  
 18 role.  
 19 **Q.** How did you acquire, if you did, any knowledge and  
 20 understanding of the operation of the Horizon System?  
 21 **A.** There were couple of members of the team who had some  
 22 knowledge, basically from working in branches, but it  
 23 was really a case of trying to figure it out as I went  
 24 along.  
 25 **Q.** So you weren't given any training at that stage?

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- 1 A. No. I think at the time there was very few people  
2 within the Post Office who'd got much IT knowledge, to  
3 be frank.
- 4 Q. Horizon had by this time, 2003, been up and running for  
5 three years. In that time, had you acquired any  
6 knowledge or understanding of the operation of the  
7 system?
- 8 A. Some but very limited, I would say.
- 9 Q. You said that you were a bad fit or words to that  
10 effect.
- 11 A. I would have said so, yes.
- 12 Q. Why were you a bad fit?
- 13 A. Because I'm not a technically -- I find technology quite  
14 difficult even now. I always felt as though I was  
15 playing catch up with technology, kind of still do now.  
16 So ideally somebody in that role would have had a good  
17 understanding and been able to understand problems  
18 easily, whereas I was -- forever seemed to be trying to  
19 understand what it was that was meant.
- 20 Q. You said that an important part of the intended function  
21 of the problem management team was IT, information  
22 technology, although the boundaries were stretched on  
23 that.
- 24 A. Yes.
- 25 Q. An important part of that would have been Horizon

9

- 1 A. To be honest, I kind of -- my memory of the time is  
2 largely more about dealing with outages or breaks  
3 between the different data houses that information flew  
4 through. So it kind of feels more around checking that  
5 the different data centres were talking to each other  
6 and who was owning the problem and resolving it. There  
7 obviously must have been issues on Horizon that came  
8 through but that's my principal memory of the role.
- 9 Q. Looking at it globally -- I appreciate it may be  
10 difficult to isolate a period of time given what you  
11 then went on to do -- what would your view have been of  
12 Horizon at that time, in this 18-month period before you  
13 went on to the data management team?
- 14 A. I don't think I got a great view of the actual Horizon  
15 System in branches. I think I was more looking at kind  
16 of Fujitsu into other data warehouses. So I'd not got  
17 a strong view in any direct direction.
- 18 Q. What were you looking at in relation to the flow of data  
19 into data warehouses involving Fujitsu?
- 20 A. Whether it's flowing as it was required.
- 21 Q. And was it?
- 22 A. Most of the time, yes, and occasionally, when a problem  
23 arose, it wasn't.
- 24 Q. Did this experience tell you anything that you can now  
25 remember about the way that Horizon was operating?

11

- 1 itself?
- 2 A. Yes.
- 3 Q. Do you know why you were picked them if you were a bad  
4 fit, bad with technology, and had no training to be  
5 a team leader in the problem management team?
- 6 A. You'd have to ask the people who interviewed me but  
7 I would guess that my competition were in a similar  
8 situation.
- 9 Q. I'm sorry --
- 10 A. The competition for the role. There was -- I don't know  
11 how many people were interviewed for the role but I got  
12 the role on --
- 13 Q. You were all in the same boat?
- 14 A. I would say -- I don't particularly know the people who  
15 were competing with me but that would be my  
16 understanding, yes.
- 17 Q. You say in your witness statement that after about  
18 18 months in the problem management team you moved to  
19 a data management team, the name of which you can't  
20 remember.
- 21 A. Correct.
- 22 Q. In that 18-month period in the problem management team,  
23 did you acquire any knowledge about the number and  
24 nature of any bugs, errors and defects in the Horizon  
25 System?

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- 1 A. With no experience of other systems of anything like  
2 similar or really any other systems, I couldn't compare  
3 it to say whether it was good, bad or indifferent. It  
4 seemed to work most of the time fine, yes.
- 5 Q. Would that be your abiding memory, that Horizon at this  
6 time seemed to work fine most of the time?
- 7 A. Yes.
- 8 Q. So when you went into the role in the data management  
9 team you wouldn't have gone into the team thinking this  
10 is a problematic system, Horizon?
- 11 A. No.
- 12 Q. So you moved into the data management team. What was  
13 your job title in the data management team?
- 14 A. I can't remember. It was the database, whatever it was  
15 called, manager.
- 16 Q. Where was that based?
- 17 A. Again that was in Dearne House.
- 18 Q. What was the function of that data management team?
- 19 A. There wasn't really a great function. It basically  
20 compiled data and I can't remember what type of data it  
21 was. It was only used by one team within POL, as far as  
22 I was aware. When I got into the role, there was  
23 a reorganisation and the problem management team and the  
24 risk team, I think, were combined into one team and the  
25 risk manager took over management of the team. So I was

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1 left in a situation where was I going to go, there was  
 2 a space there so I was kind of fitted in there.  
 3 **Q.** What data did it manage and for what purpose did it  
 4 manage it?  
 5 **A.** It seems -- I really -- it is a blur, that role. It  
 6 kind of felt like different product descriptions  
 7 perhaps, promotional information.  
 8 **Q.** Did your undertaking of that role require knowledge of  
 9 and understanding of the operation of the Horizon  
 10 System?  
 11 **A.** No.  
 12 **Q.** In the course of that role, therefore, did you acquire  
 13 any more knowledge of any errors, bugs and defects in  
 14 the operation of the Horizon System?  
 15 **A.** No.  
 16 **Q.** So Horizon wasn't really on your horizon in that role.  
 17 **A.** Not at that point, no.  
 18 **Q.** In 2007, you moved to the Finance Reporting Team?  
 19 **A.** Yes.  
 20 **Q.** What was your title in the Finance Reporting Team?  
 21 **A.** I can't remember that.  
 22 **Q.** What was the function of the Finance Reporting Team?  
 23 **A.** It was basically producing monthly reports for different  
 24 teams within the Post Office, financial management  
 25 reports.

13

1 when Horizon Online went live, so I obviously got those  
 2 dates wrong.  
 3 **Q.** So the date that you have given us in your statement of  
 4 moving to the Product & Branch Accounting team in  
 5 2009 -- sorry, 2008, might that be wrong?  
 6 **A.** Yes, I think so.  
 7 **Q.** We've certainly got documents from you in 2009,  
 8 ie before Horizon Online went live, with you in the  
 9 Product & Branch Accounting team. So you had certainly  
 10 moved by then.  
 11 **A.** Okay. There was certainly something -- my memory is  
 12 that something had happened in terms of a major project  
 13 around Horizon during the period that I was not in  
 14 Product & Branch Accounting. So all I can say was I was  
 15 aware that a major Horizon-related project had gone live  
 16 and there was lots of issues flying around there.  
 17 But I'd been in the same building as a lot of  
 18 people and knowing people who were involved. So, in  
 19 terms of my actual role, I wasn't involved at that point  
 20 but I was aware within the business of things happening.  
 21 **Q.** On that awareness, were you aware of anything  
 22 particularly problematic or difficult?  
 23 **A.** Yes, I was aware that the accounting in Product & Branch  
 24 Accounting was causing a lot of problems in a lot of  
 25 areas -- not so much -- I wasn't particularly aware of

15

1 **Q.** Where were you based?  
 2 **A.** In Chesterfield.  
 3 **Q.** To whom did you report?  
 4 **A.** I can't the lady's name.  
 5 **Q.** Did you manage a team?  
 6 **A.** No.  
 7 **Q.** How many people were in the function of finance  
 8 reporting or in the Finance Reporting Team?  
 9 **A.** I would estimate about twelve.  
 10 **Q.** In that role, did you require knowledge and  
 11 understanding of the operation of the Horizon System?  
 12 **A.** No.  
 13 **Q.** Does it follow that you didn't acquire any more  
 14 knowledge in that role of any errors, bugs and defects  
 15 in the Horizon System?  
 16 **A.** Yes. No, I would say not because I would have been  
 17 working there when Horizon Online went live. So I would  
 18 be in the same building.  
 19 **Q.** Just think back. In your statement, you say that you  
 20 moved to the Finance Reporting Team in 2007 and I think  
 21 that you're going to tell us in a moment that in 2008  
 22 you moved to the Product & Branch Accounting team.  
 23 **A.** To my best memory.  
 24 **Q.** Horizon Online didn't go live, really, until 2010.  
 25 **A.** Okay. So I was certainly in the Finance Reporting Team

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1 issues impacting branches then because Product & Branch  
 2 Accounting was based in the same building as I was in.  
 3 I was aware that that there was a lot of stress coming  
 4 there that needed resolving.  
 5 **Q.** What was the stress that was coming there?  
 6 **A.** I think feeds from branch, right, whenever things were  
 7 falling into the wrong accounts and the accounts weren't  
 8 functioning as planned.  
 9 **Q.** How widely known was this? Even though it wasn't your  
 10 team, it was obviously being talked about?  
 11 **A.** Yes. So I would guess, if I was relatively new to  
 12 the -- well, no I'd worked in the building before but  
 13 I wasn't particularly well-known person within Post  
 14 Office Limited, so I would guess other people would know  
 15 more than me but that's a guess.  
 16 **Q.** Before you moved to the Product & Branch Accounting  
 17 team -- we'll try and establish the date with greater  
 18 specificity in a moment -- were you aware of any bugs,  
 19 errors and defects in the Horizon System that affected  
 20 the integrity of the data that it produced?  
 21 **A.** No. I think I was more aware that the mapping in  
 22 preparation hadn't, in terms of how it fed into P&BA  
 23 accounts was the issue. I wasn't particularly aware of  
 24 what was happening in branches.  
 25 **Q.** What do you mean the mapping of how it went into P&BA

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1 accounts?  
 2 **A.** Part of the project planning would be to prepare data  
 3 flows. So you sell a stamp in a branch and cash is paid  
 4 for it and how that flows into the accounts within  
 5 Product & Branch Accounting, and things were running up  
 6 in unexpected areas, et cetera.  
 7 **Q.** So it was a mismatch between what was, in fact, going on  
 8 in the branches and what the data showed at  
 9 Chesterfield; is that a fair way of describing it?  
 10 **A.** Yes, I think so.  
 11 **Q.** Were you just picking this up before you moved to P&BA,  
 12 in the noise, the conversations that you were hearing?  
 13 **A.** Yes.  
 14 **Q.** At what level of seriousness was this being expressed?  
 15 **A.** Oh, it was serious.  
 16 **Q.** Can you remember before you moved into P&BA whether this  
 17 was being attributed to the way that the Horizon System  
 18 was operating?  
 19 **A.** No, I can't answer that one.  
 20 **Q.** So on a date you moved into Product & Branch Accounting,  
 21 which as we've discussed already was called P&BA; what  
 22 was your job title in P&BA?  
 23 **A.** Initially it was an analyst.  
 24 **Q.** You say in your statement that you were initially  
 25 an analyst in the debt recovery team.

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1 **Q.** What was the function more broadly of the P&BA team?  
 2 **A.** To account for mainly branch activity, to consolidate it  
 3 and report it.  
 4 **Q.** What do you mean to account for branch activity?  
 5 **A.** I'm struggling to explain that. Effectively, data would  
 6 flow in from branches, it would flow in from clients, it  
 7 would flow in from other parts of the business from, for  
 8 example, cash centres, stock centres, all these data  
 9 flows would come in and they should get matched off one  
 10 against the other and accounts cleared down to zero.  
 11 **Q.** Thank you. If we look at your witness statement,  
 12 please, WITN01090100 at page 2 -- it will come up on the  
 13 screen for you on the right-hand side. Look at  
 14 paragraph 3.  
 15 **A.** Yes.  
 16 **Q.** You are talking about the role that we're now  
 17 discussing. You say:  
 18 "The role initially focused on process  
 19 improvements and looking at accounting queries from  
 20 branches but over time concentrated almost entirely on  
 21 accounting problems in branches and as a single P&BA ...  
 22 point for both branches and other relevant teams..."  
 23 Yes?  
 24 **A.** Yes.  
 25 **Q.** Then you go on to list the other relevant teams.

19

1 **A.** Debt recovery, yes.  
 2 **Q.** Yes, I think that's what I said.  
 3 **A.** I heard "guess", sorry.  
 4 **Q.** Debt recovery team. Your post, you say, later became  
 5 described as relationship manager?  
 6 **A.** That's correct.  
 7 **Q.** Can you remember when that was?  
 8 **A.** No.  
 9 **Q.** What was the debt recovery team?  
 10 **A.** It was the team -- so branches had -- one of the options  
 11 with their debt was to put it into an account called  
 12 "Settle centrally". So if you had a £100, let's say,  
 13 debt at your balance period, you had a number of  
 14 choices: make good cash, put the cash in to make up the  
 15 deficit; make good cheque, equally put the cheque in; or  
 16 settle centrally, in which case the debt would flow  
 17 through to an account in Chesterfield and, hopefully, it  
 18 would be a case where the debt would get balanced off  
 19 against something else but, if the debt sat there, the  
 20 debt recovery team would then look to recover from the  
 21 subpostmaster.  
 22 **Q.** So the debt recovery team, would this be fair, its  
 23 function was to seek to recover debts that may be owed  
 24 by subpostmasters?  
 25 **A.** Yes.

18

1 Starting with branches first, how would branches contact  
 2 the P&BA team that were performing this role?  
 3 **A.** My role or P&BA?  
 4 **Q.** Your role.  
 5 **A.** Ideally in writing, explaining what the problem was.  
 6 **Q.** More broadly, the P&BA team, how would branches contact  
 7 the P&BA team?  
 8 **A.** The P&BA team, broadly if -- a lot of the teams were  
 9 based in correcting -- managing accounts of products and  
 10 they would be looking to effectively get an input from  
 11 the branch, and input from the client, match the two  
 12 off, clears down to nothing.  
 13 Branches might feel as though they need  
 14 a transaction correction, for example. They would  
 15 contact the NBSC, the helpline, who would then direct  
 16 them into the relevant team within P&BA.  
 17 **Q.** How would that contact be made once they had spoken to  
 18 NBSC?  
 19 **A.** Normally by phone.  
 20 **Q.** Looking at the other relevant teams that would use P&BA  
 21 as this single point of input you say "primarily  
 22 Network", just inside the brackets there.  
 23 **A.** Yes.  
 24 **Q.** Who or what do you mean by the word "Network"?  
 25 **A.** There was a Network team within POL at the time and that

20

1 would involve -- so it was primarily field support  
 2 advisers, people who were in contact with branches. So  
 3 it may well be that they had been in contact with the  
 4 branch who then said "I've got this problem, what do  
 5 I do?" They would direct them in towards P&BA.  
 6 **Q.** If Network were contacting P&BA, how would they do that:  
 7 by phone or in writing?  
 8 **A.** Oh, by phone normally or email.  
 9 **Q.** The next relevant team that you mention is "Helpline",  
 10 the NBSC.  
 11 **A.** Yes.  
 12 **Q.** Was that the only helpline that would get in contact  
 13 with P&BA?  
 14 **A.** As far as I'm aware, yes.  
 15 **Q.** How would people in the NBSC contact P&BA?  
 16 **A.** By phone -- again, possibly by email but more normally  
 17 by phone.  
 18 **Q.** Then, lastly, you mention within the brackets there  
 19 "Product & Security". Who or what is/was Product &  
 20 Security"?  
 21 **A.** They would be separate teams. There would be a Product  
 22 team who kind of, what it says on the can, would manage  
 23 the products in terms of the relationships with the  
 24 clients but also how the products are working with it at  
 25 branch level.

21

1 **A.** They would normally ring -- well, the contact would  
 2 generally be to me, usually, by phone.  
 3 **Q.** Why would the NFSP usually come to you?  
 4 **A.** Because I'd built -- that was part of the defined role  
 5 when the job set up, to get a link into the network,  
 6 actually, rather than the POL network, the subpostmaster  
 7 network, to give them a direct line into P&BA.  
 8 **Q.** Was there one person that you particularly engaged with  
 9 or was it a range of people?  
 10 **A.** There was one person who I dealt with, a paid officer,  
 11 within the NFSP, who was --  
 12 **Q.** Who was that?  
 13 **A.** Sorry, I can't remember. Oh, Stoddart ... someone --  
 14 something like Marie Stoddart.  
 15 **Q.** Marie Stoddart?  
 16 **A.** Yes, I think I've probably got the first name wrong --  
 17 **Q.** Okay.  
 18 **A.** -- which apologies to her because I knew her very well,  
 19 which is sad.  
 20 But also I used to go to a monthly meeting where  
 21 they get together and I'd go and join in with them, make  
 22 a presentation and also sit and listen to some of the  
 23 other issues going round. So we do have quite a close  
 24 relationship, I think.  
 25 **Q.** Thank you. That statement can come down from the screen

23

1 **Q.** So product could be, what, Lottery or --  
 2 **A.** Yes. So there would be a Lottery product manager who  
 3 would talk to Camelot and also be in contact during the  
 4 network into products. So when there were products --  
 5 that was a product where there was quite a lot of issues  
 6 that arose they would be in communication with Camelot  
 7 and different parts of POL to try and improve, smooth  
 8 out the process.  
 9 **Q.** How would Product get in contact with P&BA?  
 10 **A.** Same again: email or phone.  
 11 **Q.** And Security?  
 12 **A.** Security --  
 13 **Q.** Who or what are you describing by the word "Security"  
 14 there?  
 15 **A.** There was a Security team who were the ones who were  
 16 probably, I believe -- ultimately they bring  
 17 prosecutions against branches but also looking after the  
 18 integrity of the POL cash and products, the security of  
 19 it, and they would occasionally -- we'd occasionally  
 20 link up where need be, again email or phone.  
 21 **Q.** Then, lastly, outside the brackets you say:  
 22 "... along with the National Federation of  
 23 SubPostmasters (NFSP) ..."  
 24 **A.** Yes.  
 25 **Q.** How would the NFSP contact P&BA?

22

1 now, thank you.  
 2 To whom did you report?  
 3 **A.** A senior manager named Alison Bolsover.  
 4 **Q.** Say that more slowly?  
 5 **A.** A senior manager called Alison Bolsover.  
 6 **Q.** Was she one of four senior managers?  
 7 **A.** Correct.  
 8 **Q.** Who were the other three senior managers?  
 9 **A.** They changed during my time there.  
 10 **Q.** Can you give us names that you can remember?  
 11 **A.** Yes. *(Pause)*  
 12 You know, I can't remember a single name, sorry.  
 13 **Q.** You say in your witness statement that the four senior  
 14 managers themselves reported in to the head of P&BA.  
 15 Who was the head of P&BA?  
 16 **A.** Rod Ismay for most of the time that I was there.  
 17 **Q.** What was his title?  
 18 **A.** I believe it was head of P&BA.  
 19 **Q.** He reported to the Finance Director; is that right?  
 20 **A.** Correct.  
 21 **Q.** Who was that?  
 22 **A.** Again, that changed during the time I was there and  
 23 I can't remember either of the names, I'm afraid.  
 24 **Q.** Did you manage a team?  
 25 **A.** Yes, one admin officer.

24

1 Q. What was the role of the admin officer?  
 2 A. It was largely to document the cases that came in and,  
 3 yes, that was the main part of the role.  
 4 Q. How would they document the cases that came in?  
 5 A. They would generally come by letter. They'd be opening  
 6 a letter, they'd be trying to work out what the case  
 7 related to and --  
 8 Q. Just stopping you there, you said earlier they would  
 9 generally come in by phone or email?  
 10 A. Not to me, from the branches.  
 11 Q. Okay. I was talking about the whole range of reporting  
 12 from Product and Security, from the NFSP, from the NBSC,  
 13 from Network. We went through those and you said that  
 14 they generally came in through phone or email contact.  
 15 A. Yes, yes.  
 16 Q. How would the admin officer document those?  
 17 A. They wouldn't, unless I asked them to. It would be  
 18 usually a case of they'd raise an issue, perhaps which  
 19 might relate to a branch which may raise a case which  
 20 would then get documented.  
 21 But if the NFSP rang me and said, "What's going  
 22 off with this product" or whatever, that wouldn't be  
 23 documented by the admin assistant.  
 24 Q. You describe in your statement that this role  
 25 concentrated almost entirely on problems in branches and  
 25

1 in terms of advance knowledge of the Horizon System but,  
 2 again, that's probably one for the people that were  
 3 interviewing, rather than -- in fact, I don't think  
 4 there was an interview for that. I think it was placed  
 5 in there. So that was more probably a case of Alison  
 6 Bolsover, who whoever within P&BA, talking to my manager  
 7 in the reporting team at the time and seeing how the fit  
 8 went, after -- I said I'd expressed an interest in the  
 9 role when I saw the reorganisation of P&BA.  
 10 Q. Now, we've got a document dating from 2009 suggesting  
 11 that you were in role in P&BA and that you undertook  
 12 a review. Can we look at that, please. It's  
 13 POL00039029.  
 14 Do you see this appears to be a PowerPoint  
 15 presentation --  
 16 A. Yes.  
 17 Q. -- and I think you have seen it before. There's some  
 18 notes, when we get to the successive pages, underneath  
 19 each slide. Maybe if we just look at an example of  
 20 those, if we go to page 5 -- and scroll down, please.  
 21 Thank you.  
 22 So the slide that's displayed is at the top and  
 23 then some notes at the bottom; is that right?  
 24 A. Yes.  
 25 Q. So the people who are getting the presentation don't see  
 27

1 was a single point of contact.  
 2 A. Yes.  
 3 Q. Did your role therefore require knowledge of and  
 4 understanding of the operation of the Horizon System?  
 5 A. Yes.  
 6 Q. Had you got any knowledge of the operation of the  
 7 Horizon System by the time you joined?  
 8 A. It's possible that I did because managers were typically  
 9 given training to cover strike action and Christmas  
 10 support and I think that would have happened before, so  
 11 I would have thought I'd have a basic understanding of  
 12 how the Horizon System worked, yes.  
 13 Q. In that sentence you used the word "basic  
 14 understanding". I take it you use that deliberately  
 15 because that would be your level of understanding as  
 16 an occasional end user?  
 17 A. That's correct, yes.  
 18 Q. Wasn't the role that you were performing a role that  
 19 required much more detailed knowledge of the operation  
 20 of Horizon than that?  
 21 A. Yes.  
 22 Q. Again, do you know why you were selected for the job if  
 23 you didn't have a detailed understanding of the way in  
 24 which Horizon worked?  
 25 A. I would probably again point to the lack of competition  
 26

1 the notes. They are like a speaking note for yourself?  
 2 A. That's right.  
 3 Q. Yes?  
 4 A. Yes.  
 5 Q. So if we just go back to page 1, please, we'll see that  
 6 the title of the presentation is "Transaction  
 7 Corrections, Debt Reporting and Debt Recovery Review",  
 8 with your name and "January 2009" underneath it. Did  
 9 you write this document?  
 10 A. Yes.  
 11 Q. So this relates, is this right, to the period when you  
 12 were in P&BA?  
 13 A. Yes.  
 14 Q. So it's a review conducted before the introduction of  
 15 Horizon Online?  
 16 A. If --  
 17 Q. If my date of 2010 is correct.  
 18 A. Yes, yes.  
 19 Q. Can we look at page 2 of the document, please. We'll  
 20 see the "Objectives":  
 21 "Review current ways of working and supporting  
 22 operating processes in the transaction correction, debt  
 23 reporting and debt recovery areas.  
 24 "Review the impact of the current ways of working  
 25 and current operating processes in the transaction  
 28

1 correction, debt reporting and debt recovery area on the  
2 POL Network."

3 Then thirdly:  
4 "Analyse and then recommend cost effective  
5 improvements to the way the correct end-to-end  
6 transaction correction, debt reporting and debt recovery  
7 operating processes work."

8 So it's focused, is this right, on looking at the  
9 way that the systems were working at that time?

10 **A.** Yes, it sounds very much as though that's -- I've been  
11 put in a role, I've had conversations with my boss and  
12 probably other people within P&BA, and pulled together  
13 a what do I think this role involves.

14 **Q.** Not just what does it involve, but look at ways in which  
15 it could be changed, in order to make cost effective  
16 improvements --

17 **A.** Yes.

18 **Q.** -- to save money?

19 **A.** I think everything you do, you're looking at working as  
20 efficiently as possible. I don't think it was  
21 particularly a brief to come in and find ways of cutting  
22 down our costs.

23 **Q.** Now, the Inquiry's heard some evidence from a previous  
24 witness, Ms Susan Harding; do you remember her?

25 **A.** Yes.

29

1 going to be trying to focus on and probably some things  
2 are going to become more important than others as we go  
3 along. But that's probably the list of to-dos that were  
4 being agreed.

5 **Q.** What did you mean by the second bullet point "Branch  
6 Trading forces [transaction correction] acceptance"?

7 **A.** So every month a branch is required to carry out  
8 a branch trading process where effectively they pulled  
9 everything together, ideally everything balances, they  
10 have a nice zero at the bottom and we move on to the  
11 next trading period.

12 The transaction corrections can be issued at any  
13 time and there was a significant issue with the branches  
14 expressed particularly through the NFSP about -- well,  
15 sorry, just re-track a little bit. Branches used to,  
16 pre-Horizon days, used to balance weekly and it was  
17 still recommended to do a balance, not a complete  
18 balance but a kind of summary balance, to try and get  
19 a view of where they were, but the primary balance was  
20 held monthly.

21 There was a kind of half-hearted -- what seemed to  
22 be a half-hearted claim that you only issue transaction  
23 corrections on a Tuesday so we get it on a Wednesday  
24 morning when we've got to do the balancing, and  
25 I actually did a bit of exercise to disprove that and it

31

1 **Q.** What do you remember her as, a role that she performed?

2 **A.** She was actually my -- for a while in the network  
3 intervention team, we talked about earlier, the previous  
4 team that I was in.

5 **Q.** She told the Chairman that subpostmasters were never  
6 forced to settle centrally. Can we just look at page 3  
7 of this document, please. You in the first bullet point  
8 ask "What is 'Settle Centrally'?" and then say:

9 "Branch Trading forces [transaction correction]  
10 acceptance."

11 **A.** Yes.

12 **Q.** "Inadequate [transaction correction]  
13 evidence/instructions.

14 "Unclear process.

15 "Non-conformance not addressed.

16 "New subpostmasters.

17 "Aged/High Value/High Volume [transaction  
18 corrections]."

19 Overall, without coming to the detail of each  
20 bullet point first, what are you speaking about? Can  
21 you explain what is being said in this slide of yours?

22 **A.** I think I'm saying that I got into this role, I've had  
23 a look at what areas we can make improvements on and  
24 what is going to be priority ones, where it is a lack of  
25 understanding, and these are the kind of things I'm

30

1 turned out we did issue the most transaction corrections  
2 on a Tuesday. There may -- it wasn't significantly  
3 relevant compared to Wednesday or Thursdays.

4 But on branch trading, on the monthly branch  
5 trading, everything kind of has to be cleaned up, so  
6 that would mean any transaction corrections that are  
7 outstanding needed to be accepted before you could roll  
8 into the next trading period.

9 **Q.** By "accepted", you mean accepted by the subpostmaster?

10 **A.** Yes.

11 **Q.** So what is the bullet point is saying is that the action  
12 of branch trading, the monthly reconciliation process,  
13 is forcing subpostmasters to accept transaction  
14 corrections that the centre is putting to them?

15 **A.** Yes.

16 **Q.** Were you saying that's a good thing or a bad thing?

17 **A.** I was saying it was -- I don't think it was a good  
18 thing.

19 **Q.** Why wasn't it a good thing?

20 **A.** Because branches would potentially walk in on  
21 a Wednesday morning of balance day, turn the Horizon on,  
22 first thing they see is a transaction correction come  
23 through, they know they have got a balance on the night,  
24 they've got to understand what the transaction  
25 correction is and, if it's particularly one that's

32



1 a debt transaction correction that's going to  
 2 potentially cost them money, they need more time --  
 3 potentially need more time to review it and potentially  
 4 appeal against it.  
 5 **Q.** But the system is forcing them to accept it --  
 6 **A.** Yes.  
 7 **Q.** -- in order to continue trading?  
 8 **A.** Yes.  
 9 **Q.** This was an inbuilt feature of the system, is this  
 10 right, on a monthly basis, in order for a subpostmaster  
 11 to continue trading?  
 12 **A.** No. No, that was an operational requirement. But in  
 13 practice if you didn't carry out a branch trading  
 14 rollover Horizon didn't mind. It was kind of quite  
 15 happy to go along with that to a point -- I can't  
 16 remember how far in the future when the whole thing  
 17 would start falling over but, effectively, if you didn't  
 18 do your branch trading, nobody cared. A lot of branches  
 19 actually did their branch trading on a Thursday for  
 20 operational reasons, particularly the multiple partners,  
 21 I think, if I remember correctly.  
 22 **Q.** But the point that you are making here is that this  
 23 monthly exercise is forcing subpostmasters to accept  
 24 transaction corrections without necessarily a proper  
 25 exploration of the merits of the correction?

33

1 ultimately say "No, you've accepted it, so you pay up".  
 2 **Q.** What the Federation were saying, would this be right,  
 3 was that there ought to be the facility to have  
 4 a dispute button, to say "I dispute that transaction  
 5 correction, I shouldn't be forced to accept it"?  
 6 **A.** They raised it as a possibility, as an idea. Certainly,  
 7 there would have been branches who were saying "We need  
 8 a dispute button" but they were throwing it in, let's  
 9 look at whether that makes sense to do that.  
 10 **Q.** Can we see your notes underneath, please, on "Dispute  
 11 Button". Can we see your notes, the first one if that  
 12 can be highlighted under "Dispute Button". You wrote:  
 13 "... facility would be abused. POL believe they  
 14 have provided evidence to support validity on issue.  
 15 Dispute simply asks us to do it again. Robust dispute  
 16 process is answer."  
 17 Is that your reply, essentially, to the suggestion  
 18 that there should be a dispute facility; namely, no, it  
 19 would be abused?  
 20 **A.** I don't think I would put it quite as bluntly as that.  
 21 I think it was kind of looking at what the benefits and  
 22 risks might be.  
 23 **Q.** This doesn't say that.  
 24 **A.** No, no.  
 25 **Q.** "Let's look at what the benefits and risks might be".

35

1 **A.** That's correct. The system wasn't forcing you to do  
 2 that. It was the operational instructions that was  
 3 saying you need to do that, which for a conscientious  
 4 subpostmaster they would take it as I've got to do it on  
 5 a Wednesday night.  
 6 **Q.** Thank you. Can we go over to page 4 of your document,  
 7 please.  
 8 This seems to relate to issues seemingly raised by  
 9 the National Federation of SubPostmasters.  
 10 **A.** Yes.  
 11 **Q.** Including under the first bullet point "Dispute Button"  
 12 and other matters including, two bullet points from the  
 13 bottom, "Horizon [transaction correction] Receipt" and  
 14 "Core & Outreach Consolidated Statements".  
 15 Were the National Federation raising with you  
 16 concerns about the operation of the dispute process on  
 17 balancing?  
 18 **A.** That would be one of their issues, yes.  
 19 **Q.** What did they say to you about it?  
 20 **A.** They were reflecting the views of the branches, which  
 21 I think I've probably already covered, that they felt  
 22 under pressure, that it was unfair to receive  
 23 a transaction correction which they weren't aware of,  
 24 they weren't expecting and potentially to have to be  
 25 forced to accept it with the risk that POL may then

34

1 It says in your speaking note "Dispute button --  
 2 facility would be abused".  
 3 **A.** Yes. Sorry, these aren't speaking notes. These are  
 4 notes to make me -- to lead me and don't forget to  
 5 mention this, this and this. That's not what I would  
 6 say.  
 7 **Q.** Why wouldn't you put a note "Let's explore the merits,  
 8 the advantages and disadvantages of it? Why would you  
 9 make a note to, remind yourself to say "facility would  
 10 be abused"?  
 11 **A.** I can't answer that. That's the way I ...  
 12 **Q.** Is the truth of the matter that that note is there as  
 13 a prompt to remind you to say, "No, there won't be  
 14 a dispute button because the facility would be abused"?  
 15 **A.** I was going into that discussion having thought through  
 16 the pros and cons and my view is that a dispute button  
 17 would not improve the process. So I guess, yes, but it  
 18 was a case of discussing the pros and cons and  
 19 explaining why I felt, on balance, it wasn't a good  
 20 idea.  
 21 **Q.** On what evidence did you conclude that the existence of  
 22 a dispute facility would be abused?  
 23 **A.** I think to say evidence would be pushing it; so I think  
 24 an assumption.  
 25 **Q.** Why would you assume --

36

1 **A.** Sorry, there would be examples in the past. For  
 2 example, lots of transaction corrections are effectively  
 3 equal and opposite. So you might have made an error in  
 4 this product set, which should have -- so the  
 5 transaction's been made here, it should have been made  
 6 over there, so two transactions equal and opposite value  
 7 need to be issued. In an ideal world, particularly if  
 8 they are in the same team, they could be issued at the  
 9 same time, so they are accepted at the same time, but it  
 10 might be kind of potentially a month apart from one  
 11 another.

12 Essentially, the two transaction corrections have  
 13 no impact on a branch. If you accept the credit  
 14 transaction correction and make good, then you can take  
 15 the cash out of the till. If you dispute the debit  
 16 transaction correction, then there's no requirement to  
 17 return that cash back in there until the dispute has  
 18 been resolved and, effectively, there is no dispute that  
 19 we can see, it's perfectly clear they should accept them  
 20 both, but how do we get to the point where that second  
 21 transaction correction is accepted?

22 **Q.** In the answer before last you said you wouldn't say that  
 23 this view was based on evidence, you used the word  
 24 "assumption".

25 Why would you reject the idea of a dispute button

37

1 **A.** Yes.

2 **Q.** Your note continues:

3 "POL believe they have provided evidence to  
 4 support validity on issue."

5 Is that a note saying, "We've already explored the  
 6 merits of the transaction correction. We have provided  
 7 evidence already. Therefore, there's no need for  
 8 a dispute button"?

9 **A.** Yes, that's -- the theory behind the issue of  
 10 transaction correction is that you have evidence to  
 11 support that. So if you don't have the evidence, you  
 12 shouldn't be issuing the transaction correction.

13 **Q.** The note says POL believe they've provided evidence.  
 14 Does that mean provided evidence to the subpostmaster  
 15 already of the correction?

16 **A.** Yes, although that evidence may and would normally just  
 17 be the narrative attached to the transaction correction.

18 **Q.** The note continues:

19 "Dispute simply asks us to do it again."

20 Is that another reason for rejecting the  
 21 suggestion of a dispute facility?

22 **A.** Yes. As our understanding was, you press a button and  
 23 the onus moves back to POL to prove the transaction  
 24 correction. If we've already provided the evidence that  
 25 we have, what are we supposed to do more to persuade the

39

1 not on the basis of evidence but on the basis of  
 2 assumption?

3 **A.** The question I guess I'd throw back: where's the  
 4 evidence that there would be any benefit in a dispute  
 5 button.

6 **Q.** Haven't you explained to us what the benefit was  
 7 already, that subpostmasters were being forced into  
 8 accepting a transaction correction without a full and  
 9 proper exploration of the merits of the correction?

10 **A.** And that's why we introduced a procedure for branches  
 11 who were left in that situation, where they were able to  
 12 effectively raise a dispute within POL or to raise the  
 13 fact that they were accepting a transaction correction  
 14 which they hadn't fully explored which, if it kind of  
 15 ended up further down the line in a debt recovery place,  
 16 they could use that to support their challenge.

17 **Q.** So you make the subpostmaster accept the validity of  
 18 something before a proper exploration of the dispute  
 19 they wish to raise; is that the long and the short of  
 20 it?

21 **A.** Sorry can you repeat that?

22 **Q.** Yes. You force the subpostmaster to accept the validity  
 23 of the transaction correction before a proper  
 24 exploration of the dispute that they wish to raise about  
 25 it.

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1 subpostmaster that it is acceptable? That would be --  
 2 really that would be the point where I'm saying a robust  
 3 dispute process is the answer, in that if the  
 4 subpostmaster doesn't accept the evidence, there will  
 5 always be -- a transaction correction will always have  
 6 a contact number, they could -- they would then contact  
 7 the team member who's issued the transaction correction  
 8 and they can talk it through. If they don't accept it,  
 9 then we've got a dispute process to follow through.

10 **Q.** On that last note you say:

11 "Robust dispute process is the answer."

12 **A.** Yes.

13 **Q.** Who was being robust or what was robust?

14 **A.** The aspiration for me to carry out -- well, to set up  
 15 the process to start with, so that it's available to  
 16 branches and the whole of POL to be able -- aware of it  
 17 and for how to kick off the process and then for me to  
 18 ensure that the process is done as robustly as I'm able.

19 **Q.** What does "robustly" mean in this context?

20 **A.** Fair, accurate, timely.

21 **Q.** The notes continue, if we skip down to "TC receipt", so  
 22 three bullet points on, so "TC receipt", so transaction  
 23 correction receipt, remembering that there was a request  
 24 for, I think, a Horizon transaction correction receipt,  
 25 and it looks like your note-to-self is:

40

1 "... no clear benefit bar subpostmasters claiming  
2 for losses."  
3 Can you firstly explain, please, what the request  
4 was in relation to a transaction correction receipt?  
5 **A.** I've a very, very vague memory of this one. I think it  
6 was subpostmasters wanted a separate piece of paper to  
7 put in their accounts, to give to their accountant at  
8 the end of the year, which I think would be to claim  
9 losses on their accounts. I can't remember exactly what  
10 they wanted, to be honest.  
11 **Q.** This was, it seems, rejected too; is that right?  
12 **A.** Yes.  
13 **Q.** You said:  
14 "... no clear benefit bar subpostmasters claiming  
15 for losses."  
16 Wouldn't a benefit be subpostmasters exist in that  
17 there would be a receipt in respect losses they didn't  
18 accept were genuine or a genuine debt? Wouldn't that be  
19 an important benefit to them?  
20 **A.** It never occurred to me that.  
21 **Q.** Okay. Can we go on to page 5, please. "Key Issues --  
22 P&BA". I think this is addressing the key issues for  
23 the P&BA team; is that right?  
24 **A.** Yes, it looks like it, yes.  
25 **Q.** If we just expand a little, so we can see the notes  
41

1 a batch, they might issue a consolidated transaction  
2 correction which showed the net effect of the bulk  
3 error.  
4 Both kind had kind of quite eloquently described  
5 their rationale behind what they were doing in terms of  
6 how the subpostmaster saw it, and I could totally  
7 understand -- it wasn't clear to me whether it was  
8 better for a subpostmaster to see everything on the one  
9 transaction correction or lots of different individual  
10 transaction corrections. So that was the issue with  
11 that one.  
12 A better example might be the Lottery team where  
13 there was a big issue accurately recording the Lottery  
14 and a lot of that was around the fact that Lottery was  
15 typically sold a lot on the retail side, as opposed to  
16 the Post Office side, and there was the problem of  
17 getting the data across to the Post Office side in time  
18 to be reported before cut-off time, which I think was  
19 7.00.  
20 So it was fine for the branch offices that  
21 everyone shut up at 5.30, everything was accounted for.  
22 Branches that their retail side particularly would be up  
23 until 10.00 at night were missing the cut-off.  
24 So what we found was that lots of branches were  
25 making lots of errors, which were really just timing  
43

1 below, please. Thank you.  
2 Looking at the notes below, these suggest that the  
3 Post Office, I think, was concerned about its own  
4 practices and the inconsistency of them towards  
5 transaction corrections, including the operation of back  
6 office systems including IMPACT; is that right?  
7 **A.** Yes, it looks like it.  
8 **Q.** We can see in the first note:  
9 "Varying [transaction correction] routines -- one  
10 of the clear ideals I had on setting out and from others  
11 who I spoke to was consistency."  
12 But then you noted:  
13 "But then most teams have completely different  
14 approaches to identifying errors and resolving them --  
15 and for good reasons."  
16 So was there an inconsistency of approach within  
17 P&BA to identifying errors and resolving them at  
18 Chesterfield?  
19 **A.** I don't think it was so much identifying and resolving  
20 them -- well, identifying them, I don't think was so  
21 much of an issue. I think it was more about -- if I can  
22 give one example, within I think it was the cheques team  
23 at the time where one duty would issue a transaction  
24 correction for every cheque error and another duty might  
25 issue a consolidated -- so if there was a problem with  
42

1 errors and we could have been in a situation of issuing  
2 every day a transaction correction and then the next day  
3 a transaction correction would be coming back which  
4 would compensate for the errors.  
5 **Q.** So cutting through it, what were the good reasons for  
6 the completely different approaches to identifying  
7 errors and resolving them?  
8 **A.** The different requirements and the different attributes  
9 or problems of the products and how the team saw best to  
10 deal with them.  
11 **Q.** This suggests that there was a difference between teams;  
12 is that right?  
13 **A.** In their approach but, essentially, the difference --  
14 the teams were doing the same thing. They were looking  
15 at an account, where there was -- where it wasn't  
16 netting off to zero and their kind of goal in life,  
17 I guess, was to get that account down to zero.  
18 **Q.** Moving a bullet point on underneath:  
19 "POLFS -- space/access to reference data/different  
20 transactions used by different teams."  
21 Can you shortly explain what POLFS was?  
22 **A.** POLFS, I think, was a name for Product & Branch  
23 Accounting.  
24 **Q.** Were you concerned about the limitations of or within  
25 Product & Branch Accounting, in being able to  
44

1 investigate errors and resolving them?  
 2 **A.** I think -- I can't remember exactly when this was but --  
 3 **Q.** January 2009?  
 4 **A.** Okay. So at that point, there would be, in many of the  
 5 teams, quite large backlogs and, clearly, if you have  
 6 got a large backlog of work, you'd like more resource to  
 7 help clear it but there were limitations.  
 8 **Q.** I think that might be a different issue. Isn't this  
 9 talking about the extent to which this back office team  
 10 had access to all of the data generated by both the POL  
 11 back office systems and by Horizon, for the purposes of  
 12 an investigation into the validity of a transaction  
 13 correction or a discrepancy?  
 14 **A.** Their checking a transaction correction would be about  
 15 what there is in POLFS. Sorry, POLFS is the Finance  
 16 System, isn't it? Sorry, I do beg your pardon. It  
 17 would be about what's in the Finance System not  
 18 particularly what was on the Horizon System because the  
 19 Horizon System should -- if this has happened on  
 20 Horizon, then this data should then flow into this point  
 21 within POLFS.  
 22 **Q.** You are speaking to the limitations of POLFS here. What  
 23 were the limitations of POLFS?  
 24 **A.** I'm sorry, I can't recall what I was thinking of at that  
 25 point.

45

1 **A.** Yes.  
 2 **Q.** -- by doing them; you have actually got to follow them  
 3 up by debt recovery?  
 4 **A.** I think the first point is to make sure that they're  
 5 right and if we know that they're right then we can  
 6 focus on debt recovery where necessary.  
 7 **Q.** Was a focus on helping the bottom line, ie by generating  
 8 money for the Post Office through debt recovery from  
 9 subpostmasters?  
 10 **A.** I personally wasn't ever given that pressure, whether  
 11 somebody like Rod Ismay was, from his Finance Director,  
 12 I couldn't say.  
 13 **Q.** What was the purpose of mentioning whether clearing the  
 14 backlog helps actually depends on whether the debts are  
 15 paid by the subpostmasters? Why were you mentioning  
 16 that?  
 17 **A.** I was trying to make sure that teams weren't just  
 18 ramming out as many transaction corrections as possible.  
 19 The integrity of them was important -- well, more than  
 20 important, it was critical that things went out that  
 21 were correct, and that would ultimately save because it  
 22 would potentially just create a circle if we were  
 23 disputing, reissuing, et cetera. We needed to be able  
 24 to deal with it once, make sure we dealt with it  
 25 properly, so it then doesn't come back on us.

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1 **Q.** Next, if we skip over debt levels, we go to "Ownership":  
 2 "Ownership -- main focus has been on clearing  
 3 backlog. Whether that helps the bottom line depends on  
 4 whether debts generated are paid. Equally there is no  
 5 incentive to seek out compensating [transaction  
 6 corrections]."  
 7 Does this reflect the fact that the Post Office,  
 8 through P&BA, was most concerned about getting money  
 9 back into the business, debt which it considered owing  
 10 and outstanding?  
 11 **A.** I think that was my -- we talked before about me making  
 12 assumptions about evidence and this is perhaps another  
 13 example of that. But, certainly, the biggest focus was  
 14 around getting these accounts down to a manageable  
 15 format. So the teams were dealing with stuff in  
 16 a timely manner rather than trying to pull something --  
 17 work on something that was months old.  
 18 But the point I was trying to make was that, just  
 19 to send out lots and lots of transaction corrections to  
 20 move these values, if they all end up being disputed,  
 21 and correctly so in many cases, then the stuff just  
 22 still flows around within POLFS and isn't being cleared  
 23 down.  
 24 **Q.** Aren't you emphasising by this that it's no good doing  
 25 transaction corrections, just to help the bottom line --

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1 **Q.** The last sentence on this page:  
 2 "Equally there is no incentive to seek out  
 3 compensating [transaction corrections]."  
 4 Were you suggesting there that there was no  
 5 incentive within Chesterfield to seek out transaction  
 6 corrections that would have the effect of the Post  
 7 Office paying money to the subpostmasters?  
 8 **A.** Yes, I think one of the issues is, as I already  
 9 mentioned, is different -- so we had different teams  
 10 that dealt with different products. There was two ways  
 11 that we could have looked at this and the alternative  
 12 way had been in operation before, where team --  
 13 individuals looked after branches. So they would look  
 14 after a branch across the board, which was great because  
 15 they got a view of the branch but perhaps not so great  
 16 in terms of knowledge of dealing with products, whereas  
 17 the way we operated was, in terms of products, so teams  
 18 became very knowledgeable about their products and  
 19 hopefully dealt with them well. But they didn't get  
 20 a view of the branch they were dealing with.  
 21 So whereas if you are looking at a branch as  
 22 a whole it might be more obvious to pick up "Well, we've  
 23 got an error here, we've got an error there. Oh, look,  
 24 these actually match, we can sort this branch out fine".  
 25 Whereas if you're just looking in a single line under

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1 a limited number of products, then you won't be aware of  
 2 what's going on there and if you're being told "Clear  
 3 this account down", then you're not going to trot off to  
 4 the other side of the room and have a conversation "Have  
 5 you got a matching item to this, because I think" --  
 6 some people will do that anyway; other people wouldn't.

7 **Q.** In this sentence, were you reflecting the fact that in  
 8 the team as you saw it there was no incentive to seek  
 9 out corrections that had the effect of benefiting  
 10 subpostmasters?

11 **A.** I would say that's correct, yes.

12 **Q.** Can we turn to page 6, please:  
 13 "Key Recommendations -- Existing Processes."  
 14 Under the third of them:  
 15 "Define 'settle centrally'.  
 16 Then scroll down to the notes, please, and the  
 17 third point under your notes you say:  
 18 "Define Settle Centrally -- legally they have  
 19 accepted the debt. But would a court wear it? Need  
 20 some assurances around it."  
 21 Can you just explain what "settle centrally" was,  
 22 please?

23 **A.** Settle centrally was an option where a discrepancy arose  
 24 either through accepting a transaction correction or as  
 25 a cash balance at the end of the branch trading.

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1 **Q.** -- secondly, pay up by cheque; or, thirdly, settle  
 2 centrally?

3 **A.** Yes.

4 **Q.** They were the only three options?

5 **A.** I think multiple branches might have had a different way  
 6 of doing it and, certainly, Crown Offices had  
 7 a different approach. But your bog standard  
 8 subpostmaster --

9 **Q.** They were the three options?

10 **A.** -- they were their options, yes.

11 **Q.** So the first two involved the payment or the promise of  
 12 payment of money through a cheque, yes?

13 **A.** Yes.

14 **Q.** The third option, settle centrally, you note:  
 15 "... legally they [that's the subpostmasters] have  
 16 accepted the debt."  
 17 **A.** That was -- I've got no legal training whatsoever so  
 18 that was my understanding of -- and also like the  
 19 NFSP -- I think everybody's understanding was, if you  
 20 accepted that TC, you have accepted it.

21 **Q.** Where did you get that understanding; where did everyone  
 22 get that understanding from?

23 **A.** I couldn't specifically answer that.

24 **Q.** If you had that understanding and everyone in P&BA had  
 25 that understanding, did you communicate that to

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1 I think there was a limit of £150, below which you  
 2 couldn't settle centrally but, if, say, you had a debt,  
 3 a loss of £200, at the end of branch trading, then you  
 4 had the choice of putting the cash in, which got rid of  
 5 the debt, making out a cheque, make good by cheque,  
 6 which sends a cheque off for £200 to clear off the debt,  
 7 or not to clear the debt at that point but to settle  
 8 centrally, moves it onto a separate account within POL  
 9 and, if nothing subsequently would happen from that, the  
 10 team would then -- the debt recovery team would then  
 11 start to recover that £200.

12 But it may well be that the subpostmaster is fully  
 13 aware that they are due a credit transaction correction,  
 14 which hopefully will arrive in the next trading period,  
 15 they get that credit transaction correction, settle it  
 16 centrally, the two net off and everyone's forgotten  
 17 about it.

18 If there's no compensating transaction correction  
 19 or compensating credit at the end of the next branch  
 20 trading, at some point, defined point, the debt recovery  
 21 team would start looking at recovering that debt.

22 **Q.** So you have identified three options where there's  
 23 a discrepancy: firstly, pay up in cash by the  
 24 subpostmaster --

25 **A.** Yes.

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1 subpostmasters or their representatives when they spoke  
 2 to you, "But hold on, by asking to settle centrally you  
 3 have legally accepted the debt"?

4 **A.** No, I would never say that.

5 **Q.** Why not, if that was your belief?

6 **A.** Because that wasn't my -- my approach was to make sure  
 7 that the subpostmasters and POL were treated correctly,  
 8 that things were done correctly.

9 **Q.** Why were you asking the question "would a court wear  
 10 it"?

11 **A.** Because of some of the problems that we've already  
 12 discussed. Branches are obliged to settle -- to accept  
 13 transaction corrections, which they may not think is  
 14 proper to them at the time, to get -- okay, they might  
 15 not want to pay the £200 straight away but they will  
 16 settle centrally, which defers and gives them a chance  
 17 to challenge. But my non-legal opinion is that, in  
 18 a court of law, if a subpostmaster went into a court  
 19 saying, "Look, I was forced to settle centrally, I had  
 20 to settle centrally, the Post Office is now trying to  
 21 recover this money, this is the evidence that I have  
 22 that says it's not correct", in my view, the court would  
 23 say, "Well, yeah, you're right, the Post Office is  
 24 wrong".

25 **Q.** You knew, I presume, that the IMPACT Programme had

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1 removed the facility to put any disputed funds into  
 2 a suspense account where the disputed funds would be  
 3 identified before the subpostmaster accepted the cash  
 4 account. You knew that that was the previous position?  
 5 **A.** Sorry, could you read that again for me.  
 6 **Q.** Yes. That before the IMPACT Programme -- did you know  
 7 about the IMPACT Programme?  
 8 **A.** I recognise the name but I'm not quite sure what that  
 9 did.  
 10 **Q.** That previously there was a facility to put disputed  
 11 funds into a suspense account before the subpostmaster  
 12 accepted the cash account?  
 13 **A.** All right. No, I wasn't aware of that or I can't  
 14 remember being aware of it.  
 15 **Q.** But the position from when you came into post was that  
 16 that wasn't possible on rollover on branch trading?  
 17 **A.** That's correct, yes.  
 18 **Q.** You had to either pay money or promise to pay money,  
 19 which you understood to mean that the subpostmaster had  
 20 accepted their liability to pay the debt?  
 21 **A.** Yes.  
 22 **Q.** The fourth bullet point that top of the page, "Disputes  
 23 resolved prior to DFR", and then your notes, which are  
 24 the next paragraph on, at the bottom:  
 25 "Disputes pre-DFR -- should not happen but need to

1 **Q.** Let's take a different example. What about  
 2 a subpostmaster that suggested that a large transaction  
 3 that was shown by Horizon had, in fact, never taken  
 4 place.  
 5 **A.** Right. I don't think that that ever came up but, if  
 6 that did, then that would be a massive red flag.  
 7 **Q.** Put another way, what evidence did you have in mind when  
 8 they said "they need to present evidence"; what evidence  
 9 was sufficient?  
 10 **A.** Pretty much every case is different but they would lay  
 11 out what their understanding of what happened, where  
 12 they thought the problem was. I would investigate that,  
 13 I would look into Horizon records and try and understand  
 14 what's happened and be able to explain what's happened  
 15 and hopefully find a resolution or illustrate why this  
 16 has happened.  
 17 **Q.** Was there any formality brought to bear, any  
 18 description, on what evidence was sufficient to make  
 19 a dispute formal and, therefore, stop deductions from  
 20 remuneration?  
 21 **A.** No. The process was to write in to me. Once that  
 22 letter arrived, and it could be a very basic -- some  
 23 subpostmasters would write reams of pages, others  
 24 would -- half an A4 but that would create a formal  
 25 dispute. Any debt recovery would be paused at that

1 lay out their responsibilities as well as ours. How  
 2 does a dispute become formal? They need to present  
 3 evidence."  
 4 What does "dispute pre-DFR" mean, please?  
 5 **A.** Branches having the opportunity -- DFR means "deduction  
 6 from remuneration". So we would start -- the debt  
 7 recovery team would start taking money from --  
 8 **Q.** From their pay?  
 9 **A.** From their pay, yes. So it was about no DFR should be  
 10 happening -- should start while a dispute is still live.  
 11 **Q.** So would a dispute only be treated as formal by the Post  
 12 Office after the presentation of evidence by  
 13 a subpostmaster?  
 14 **A.** Yes. Well, not necessarily evidence but, for example,  
 15 if a subpostmaster had written in to me, then we would  
 16 put a block on the debt recovery process until I'd  
 17 responded, backing up or accepting -- backing up POL's  
 18 position or accepting the subpostmaster's position.  
 19 **Q.** Would a subpostmaster's statement that the figures that  
 20 were being produced by Horizon didn't tally with the  
 21 records that they had kept in store be sufficient?  
 22 **A.** If you are talking about paper records or -- I'd  
 23 certainly look at Horizon records and -- well, I'd be  
 24 looking -- as part of my job, I'd be looking at Horizon  
 25 records to see what was in it.

1 point and not reinstated or started until I'd responded  
 2 to the subpostmaster's concern. It may well be, if  
 3 there's just a short amount, I might we'll have to go  
 4 back to the subpostmaster and say, "Look, I need a bit  
 5 more what can you provide us", but then the dispute will  
 6 be myself and the subpostmaster trying to find the  
 7 evidence that supported the issue one way or the other.  
 8 **Q.** What if the subpostmaster said that, "The figures in  
 9 Horizon are just wrong, I can't tell you why they're  
 10 wrong"?  
 11 **A.** Then I would look at it to try and work out what -- if  
 12 there was -- what I'd typically do, if we're saying that  
 13 a branch, for example, has got a cash shortage and we  
 14 knew -- we could see that on the previous evening that  
 15 they'd balanced, or whatever the discrepancy was, and  
 16 then at the end of the next day they'd got this  
 17 particular cash shortage, then what I would typically do  
 18 is look at the transactions for that branch for that  
 19 day. There may be something that just jumps out at me  
 20 straight away, I can say "Oh, yes, I can seek what the  
 21 issue is". Most usually there wouldn't be.  
 22 But I would send -- potentially send an Excel  
 23 spreadsheet to branches where they could look at the  
 24 transactions in a better format than what Horizon  
 25 reporting would come up and they could have a look and

1 say if there's any transaction -- and I'd suggest "Look,  
2 you know, there's this transaction, is that going to be  
3 right; is this transaction going to be right? Have  
4 a look at this one or -- but have a look at them all,  
5 see if there's any transactions that you don't recognise  
6 that you think is suspicious, where there might be  
7 miskeying, have I missed anything?"

8 **Q.** You were working only from the data that Horizon itself  
9 produced?

10 **A.** Yes.

11 **Q.** What if that data was wrong?

12 **A.** Then I'd be looking for a branch to say something like,  
13 "The butcher always comes in at 3.30 and makes a cash  
14 deposit and there isn't one there". So we need to  
15 understand did the butcher actually come in that day or  
16 he did and there's no record of it on Horizon, or  
17 there's a transaction here which I don't recognise, that  
18 hasn't happened.

19 I can't recall that actually happening.

20 **Q.** Can we, just before the morning break, look at the last  
21 page of this document, please, page 7. The first bullet  
22 point:  
23 "Remove second reminder letter" and then look at  
24 the notes underneath:  
25 "Recovery -- remove one letter in process -- not

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1 right?

2 **MR BEER:** Yes, please.

3 **SIR WYN WILLIAMS:** Fine.

4 (11.32 am)

5 (A short break)

6 (11.48 am)

7 **MR BEER:** Good morning, sir. Can you see and hear me okay.

8 **SIR WYN WILLIAMS:** Yes, I can thank you.

9 **MR BEER:** Thank you very much.

10 Mr Winn, I want to look at something called the  
11 receipts/payments mismatch book. Can we start by  
12 looking at POL00028838. Thank you very much.

13 These appear to be notes about a meeting to  
14 discuss the receipts/payments mismatch bug. Can you see  
15 at the top "Receipts/Payments Mismatch issue notes"?

16 **A.** Yes.

17 **Q.** We can see that the attendees at a meeting to discuss  
18 the receipts and payments mismatch issue include you?

19 **A.** Yes.

20 **Q.** "Andrew Winn (AW) POL Finance". We can also see that  
21 Mr Jenkins from Fujitsu was there, yes?

22 **A.** Yes.

23 **Q.** Can I just deal with the date of this meeting first.  
24 This document is not dated and does not itself identify  
25 the date of the meeting but if we look at page 3 of the

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1 contractual and adds no value. People either pay up or  
2 hang out to DFR -- may as well get there."

3 Were you by this saying that a step in the process  
4 should be removed so that you could get to debt recovery  
5 from the subpostmaster sooner rather than later?

6 **A.** Yes.

7 **Q.** Is that a reflection of pressure to recover, from  
8 subpostmasters, debts?

9 **A.** No. No, I would say it was more a case of we'd done  
10 some analysis and found out that people paid the debts  
11 straight away, or once we sent a letter, they paid the  
12 debt. The second letter didn't make any difference.

13 They obviously didn't get the second letter if  
14 they'd already paid. If they hadn't paid, they didn't  
15 start paying. So there was no benefit in sending that  
16 out. It saved resource within the team and, yes, it  
17 would have had an impact on the bottom line but it would  
18 have been pretty marginal.

19 **Q.** And the "may as well get there", you're saying you may  
20 as well get to taking money from subpostmasters' wages  
21 sooner rather than later?

22 **A.** Yes.

23 **MR BEER:** Thank you very much. Can we take a break there  
24 for 15 minutes, please?

25 **SIR WYN WILLIAMS:** Yes. So that takes us to 11.45; is that

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1 document, we can see in the second paragraph Fujitsu are  
2 writing a code fix which will stop the discrepancy  
3 disappearing, et cetera, et cetera, and then there are  
4 some dates mentioned of 4 October, that's 2010, and then  
5 a date of 11 October, 21 October, yes?

6 **A.** Yes.

7 **Q.** Then if we go to page 4, on this page and on the next  
8 page there are a series of actions. Would these be  
9 actions arising from the meeting?

10 **A.** That would seem sensible.

11 **Q.** You can see that there are target completion dates  
12 ranging between 6 and 8 October.

13 **A.** Yes.

14 **Q.** Would it follow from this that the meeting is likely to  
15 have taken place in September 2010 or early October  
16 2010?

17 **A.** I'm not sure where the years come from. I'd say  
18 September certainly but -- have we seen the year?

19 **Q.** We haven't seen a year but we know that this bug was  
20 only discovered in that year and therefore I'm taking  
21 that as the year.

22 **A.** I've got nothing to argue with there.

23 **Q.** Okay. Can we go back to page 1, please, and look at the  
24 nature of the receipts and payments mismatch bug. If we  
25 look at page 1, underneath the table, under the

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1 cross-heading "What is the issue?" it reads:  
 2 "Discrepancies showing at the Horizon counter  
 3 disappear when the branch follows certain process steps,  
 4 but will still show within the back end branch account.  
 5 This is currently impacting circa 40 Branches since  
 6 migration onto Horizon Online, with an overall cash  
 7 value of circa [£20,000] loss. This issue will only  
 8 occur if a branch cancels the completion of the trading  
 9 period, but within the same session continues to roll  
 10 into a new balance period."  
 11 Then if we go on to page 2, please, in the middle  
 12 in bold, I think it's in bold, anyway:  
 13 "Note the Branch will not get a prompt from the  
 14 system to say there is a Receipts and Payments mismatch,  
 15 therefore the Branch will believe they have balanced  
 16 correctly."  
 17 Then under lastly "Impact" at the foot of the  
 18 page, the first two bullet points:  
 19 "The branch has appeared to have balanced whereas  
 20 in fact they could have a loss or a gain."  
 21 And:  
 22 "Our accounting systems will be out of sync with  
 23 what is recorded at the branch."  
 24 Does all of the information in those three places  
 25 accurately and fairly describe the nature of what was  
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1 "I'm fine, I've got nothing to put in, take out,  
 2 whatever. I've balanced to the penny, that's great,  
 3 press rollover", and then a statement will roll out but  
 4 whether it's actually reviewed in detail, I would say  
 5 not.  
 6 I've got to apologise, I may be wrong on that, but  
 7 that's my memory from the receipts and payments  
 8 mismatch.  
 9 **Q.** Would you accept that the contemporaneous evidence  
 10 suggests that it was believed that there wouldn't be  
 11 anything in branch to show the branch that they had not  
 12 balanced?  
 13 **A.** I think -- I'm surprised about that. I think the branch  
 14 trading statements would show -- whether the branch  
 15 would be able to interpret it as not balancing, I'm not  
 16 sure. I couldn't say that. But I think branches would  
 17 believe, from the branch trading process, they had  
 18 balanced and I believe a lot of branches did not  
 19 routinely check over their branch trading statements  
 20 when it balanced. But that's --  
 21 **Q.** Just one final point at this. We could look at another  
 22 place at the top of this page:  
 23 "Note at this point nothing feeds into POLSAP and  
 24 Credence, so in effect the POLSAP and Credence shows  
 25 discrepancy whereas the Horizon System in the branch  
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1 then understood about the receipts and payments mismatch  
 2 issue?  
 3 **A.** Yes, I think so, although my memory of the receipts and  
 4 payments mismatch would be that the branch trading  
 5 statements would show a compensating figure. I can't  
 6 remember where it would be. It's not something I would  
 7 expect branches to see and they would believe that  
 8 they'd balanced correctly but, if my memory serves  
 9 correct, on the branch trading statement there would be  
 10 a value showing.  
 11 **Q.** If that memory is correct, why does this say the  
 12 opposite?  
 13 **A.** That's a very good question, although it doesn't say  
 14 anything about the branch trading statement.  
 15 **Q.** That would be the obvious place where a loss or a gain  
 16 would be shown and this is saying that the branch won't  
 17 get a prompt and the branch will believe they have  
 18 balanced correctly and under "Impact":  
 19 "The branch appears to have balanced, whereas in  
 20 fact they could have a gain or a loss."  
 21 **A.** I think my memory as it is would be that when you get,  
 22 towards the end of your branch trading statements, your  
 23 final kind of thing before rolling is to say "This is  
 24 the balance" or "There is no balance". So I think that  
 25 is the point that subpostmasters would look at and say  
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1 doesn't. So the branch will then believe they have  
 2 balanced."  
 3 Does that help you with some further -- a further  
 4 contemporaneous record to suggest that the branch will  
 5 believe they have balanced, whereas, in fact, they have  
 6 not?  
 7 **A.** Yes, I would -- that does suggest it's not that I'm  
 8 mistaken, it wasn't shown on the branch trading  
 9 statement. My main recollection is that the balancing  
 10 amount showed in a discrepancy account within POLSAP.  
 11 So I would accept that it may not have shown, I'm  
 12 mistaken on my memory of that.  
 13 **Q.** I understand, thank you.  
 14 Can we look at the date of discovery of the  
 15 receipts and payments mismatch bug and can we look,  
 16 please -- well, can you remember when you attended this  
 17 meeting for how long the payments and mismatch bug had  
 18 been discovered or was this the first that you became  
 19 aware of it?  
 20 **A.** I must have been. I wouldn't have just gone to  
 21 a meeting without knowing anything about it. So I must  
 22 have known something beforehand.  
 23 **Q.** Can you remember from whom you learnt that?  
 24 **A.** No, sorry.  
 25 **Q.** Who would it be likely to be?  
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1 A. Not sure.

2 Q. Can we look at the third page of the document, please.

3 The top paragraph:

4 "The Receipts and Payments mismatch will result in

5 an error code being generated which will allow Fujitsu

6 to isolate branches affected by this problem, although

7 this is not seen by the branches. We have asked Fujitsu

8 why it has taken so long to react to and escalate an

9 issue which began in May. They will provide feedback in

10 due course."

11 Can we firstly look at whether that's accurate,

12 that the problem first began in May and then what

13 response the Post Office got when it challenged Fujitsu

14 on why did taken so long to react and escalate the

15 issues.

16 So firstly the date on which the problem was

17 discovered. If the problem was discovered in May, that

18 would be just before Horizon Online was accepted in June

19 2010; would that be right or don't you remember when

20 Horizon Online was accepted?

21 A. I don't remember exactly.

22 Q. We know the acceptance of Horizon Online was June 2010.

23 This record here suggests that the problem was

24 discovered or it began in May. If it's correct that the

25 problem began in May, that would be about four months or

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1 If that's right it's probably been around since

2 day one and data is being dropped after 6 months, that

3 would put the bug's existence before May 2010, wouldn't

4 it?

5 A. Correct, yes.

6 Q. From an email being sent in September 2010. Were you

7 ever given that information by Fujitsu?

8 A. No.

9 Q. How would it have affected your conduct and thinking if

10 you had been told that information, that the bug had

11 probably been around since day one?

12 A. It would have been a little bit scary, I think.

13 Q. Turning to --

14 A. Sorry, can I just expand on that a little bit. Myself,

15 P&BA, were pretty much dependent on Fujitsu alerting us

16 to what branches were affected by a receipts and

17 payments mismatch. So if we weren't -- if my memory is

18 correct, the discrepancy would fall into the discrepancy

19 accounts within our team. My worry from that earlier

20 period is -- when I'm saying there's lots of things

21 flying around into the wrong accounts, and what have

22 you -- whether any values ended up getting written off

23 because we were -- my later memory of the receipts and

24 payments mismatch was that it sits there, they have

25 a discrepancy of 10 quid, 10 quid sat in the discrepancy

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1 so before this meeting, if we're right that this was

2 September/October time, yes?

3 A. Yes.

4 Q. Can we just look, please, at POL00029084. This is

5 an email exchange that you weren't copied into but

6 I want to ask you something about the content of it.

7 A. Sure.

8 Q. If we look at the foot of the page, if we scroll down,

9 please, we can see this is an email from Gareth Jenkins,

10 on a date in September 2010, to Mark Wright. It's cut

11 off on the page but if we scroll up we can see the reply

12 from mark is Mark Wright. Now, we know that Mr Jenkins

13 attended the meeting that you attended, yes?

14 A. Yes.

15 Q. Just if we look at the penultimate paragraph on this

16 page, at the foot of the page:

17 "Jon is easily able to reproduce the problem in

18 a development environment and we are planning to

19 recreate the scenario and attempt a fix in that

20 environment in the next couple of days. However it is

21 probably worth starting on the data extraction to

22 ascertain the full scope of the issue ... since it has

23 probably been around since day one and data more than 6

24 months old is being dropped from BRSS, so the sooner we

25 run the queries the better."

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1 account, we just basically give that back to the branch

2 and away we go. If we haven't got the money in the

3 discrepancy account, we wouldn't know there was any

4 issue. So yes, that would worry me.

5 Q. Can I go back to the second question then, what was done

6 within POL to question why Fujitsu hadn't reported the

7 problem sooner. If we just go back to the document we

8 were previously looking at, which was POL00028838, and

9 go to page 3, please. It's that paragraph at the top,

10 again, in the second line:

11 "We have asked Fujitsu why it has taken so long to

12 react and escalate an issue which began in May. They

13 will provide feedback in due course."

14 What was done within POL to question why Fujitsu

15 had not reported the problem whenever it began?

16 A. I can't answer that. That wouldn't be me who was

17 raising that question. I would guess that was someone

18 from the IT team within POL.

19 Q. Just looking at the first page of the document, the list

20 of the people there, which of those people would be

21 doing the questioning of Fujitsu, why it had taken so

22 long to report the issue?

23 A. I would guess Ian Trundell.

24 Q. Because he has "IT" written next to him?

25 A. Yes. But also I think he's probably the most senior

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1 manager on that list.  
 2 **Q.** The first six of you are from POL -- is that right --  
 3 from Post Office --  
 4 **A.** Yes.  
 5 **Q.** -- and then the last four or from Fujitsu?  
 6 **A.** Yes.  
 7 **Q.** He was the most senior person present?  
 8 **A.** I believe so.  
 9 **Q.** None of the people there appear to be from Legal; is  
 10 that right?  
 11 **A.** No, but Security is probably quite close that would kind  
 12 of deal closely with Legal but, yes, you're correct,  
 13 nobody from Legal.  
 14 **Q.** Can you recall what the response was from Fujitsu, if it  
 15 was passed on to you: why has it taken so long to react  
 16 to and escalate this issue which, according to them,  
 17 began in May?  
 18 **A.** No, I've got no recollection, I'm afraid.  
 19 **Q.** Why would it be important to pursue that with Fujitsu or  
 20 would it be important to pursue that?  
 21 **A.** Yes.  
 22 **Q.** Why would it be important?  
 23 **A.** Because we would need to know things in a timely manner  
 24 to make sure that branches are properly supported if  
 25 there are issues impacting them.

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1 **Q.** It's a note by Mr Jenkins. Can you remember whether  
 2 this was a document that was sent to you at the time or  
 3 tabled at the meeting that we're discussing?  
 4 **A.** No, I've got no memory of it, I'm afraid.  
 5 **Q.** Let's look at page 8, please. At the foot of the page,  
 6 in the last paragraph:  
 7 "It should be noted that as Discrepancies are  
 8 normally Losses, then a Lost Discrepancy would normally  
 9 work in the Branch's favour and so there is no incentive  
 10 for the Branch to report the problem. Also if we do  
 11 amend the data to reintroduce the Discrepancy, this will  
 12 need to be carefully communicated to the Branches to  
 13 avoid questions about the system integrity."  
 14 Why would anyone wish carefully to communicate  
 15 information to branches to avoid questions about the  
 16 integrity of the Horizon System?  
 17 **A.** I would assume to illustrate -- to suggest that it's  
 18 a controlled issue rather than a kind of all-embracing,  
 19 the system's bust, issue.  
 20 **Q.** Can I put it another way: this bug did raise questions  
 21 about the integrity of the Horizon System, didn't it?  
 22 **A.** Yes.  
 23 **Q.** What proper or appropriate reason would there be for not  
 24 telling people the existence of the bug and, therefore,  
 25 its impact on the integrity of the Horizon System?

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1 **Q.** We're on page 1 of the document, can we look at the  
 2 second paragraph:  
 3 "At this time we have not communicated with  
 4 branches affected and we do not believe they are  
 5 exploiting this bug intentionally."  
 6 Putting aside for one moment the cases in which  
 7 data produced by Horizon was being relied on in the  
 8 prosecution of subpostmasters, why wouldn't POL tell  
 9 branches affected and, indeed, other branches that there  
 10 may be a bug in the Horizon System that was affecting  
 11 the balancing process?  
 12 **A.** I don't know. I think there would be a concern about  
 13 putting out a branch-wide notice but I think if we  
 14 identified a branch had been impacted by the problem  
 15 then they need to know about it as soon as possible and  
 16 told that we're sorting it out.  
 17 **Q.** Can we look at page 6, please. This is a document dated  
 18 29 September 2010, produced by Mr Gareth Jenkins. If we  
 19 just expand it, please, to look at the whole document  
 20 and just take a moment. You've seen this before. This  
 21 has been, I think, sent to you.  
 22 **A.** No, it doesn't ring a bell. It might do.  
 23 **Q.** It's in the pack of documents that was sent to you but  
 24 it's about the same issue.  
 25 **A.** Okay.

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1 **A.** I can't answer that.  
 2 **Q.** Wouldn't the reason be that care would need to be taken  
 3 because, if the full facts were revealed, it would raise  
 4 questions about the integrity of the Horizon System and  
 5 that might damage the business of Post Office and  
 6 Fujitsu?  
 7 **A.** Yes, I think it would need to be presented in a way of  
 8 saying "We've identified this, this is the impact on  
 9 branches, this is what we're doing about it". I just  
 10 think it would need to be explained carefully.  
 11 **Q.** Why would you want to avoid -- why would anyone want to  
 12 avoid questions about the system's integrity?  
 13 **A.** It's difficult to put that into the correct words. I'm  
 14 sorry, I'm struggling to find the right words.  
 15 **Q.** I can understand.  
 16 Can we go back to page 2, please. This is back to  
 17 the note prepared, we think, following the meeting and  
 18 so of the meeting. At the foot of the page, we looked  
 19 at the first two bullet points under "Impact". Can  
 20 I examine the remaining three, please, at the foot of  
 21 the page. "Impact":  
 22 "If widely known could cause a loss of confidence  
 23 in the Horizon System by branches."  
 24 Would you agree that a fairer and more balanced  
 25 way of writing the sentiments behind that sentence would

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1 be: if the bug was widely known, it could ensure that  
 2 branches are provided with accurate information about  
 3 a known fault in the system that they are required to  
 4 use?  
 5 **A.** Yes.  
 6 **Q.** Why wasn't the discussion along those lines -- let's  
 7 provide accurate if to subpostmasters about the facts as  
 8 they are known -- rather than: if this bug is widely  
 9 known, it will cause or could cause a loss of confidence  
 10 in the system by branches?  
 11 **A.** Yes, I think it's a fair question. I think I was  
 12 certainly of the view that impacted branches should be  
 13 fully informed of what's happening. I don't think  
 14 I ever really considered a branch-wide communication.  
 15 **Q.** Would a fairer approach to have been to discuss and  
 16 conclude that the dissemination of such information  
 17 would ensure that subpostmasters and those who were  
 18 investigating them do not proceed on the false basis  
 19 that the Horizon System is robust and that discrepancies  
 20 are always the responsibility of the subpostmaster?  
 21 **A.** Yes, yes.  
 22 **Q.** Does the fact that this note was not written in either  
 23 of those ways reflect the fact that that wasn't a view  
 24 expressed by anyone at the meeting?  
 25 **A.** I've not got a clear enough memory of the meeting.

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1 know where to go from there. It wasn't something where  
 2 I was able to sit there with Fujitsu and say, "I don't  
 3 believe you've told us about every branch".  
 4 **Q.** You can test their methodology, can't you: how have you  
 5 reached this; what investigations have you undertaken;  
 6 who's involved; how seriously are you considering this;  
 7 what effort have you put into it?  
 8 **A.** Yes, and I think that would be something that the IT --  
 9 ie Ian Trundell, that would be his area to investigate  
 10 that. I could ask a question similar to that and  
 11 basically not understand a word that comes back, I'm  
 12 afraid. I've already said before, my IT knowledge is  
 13 very limited.  
 14 **Q.** So the next bullet point:  
 15 "Potential impact upon ongoing legal cases where  
 16 branches are disputing the integrity of Horizon Data."  
 17 Did you or anyone else in the meeting, to your  
 18 knowledge, consider whether information about the bug  
 19 needed to go to POL Legal in order to make disclosures  
 20 in ongoing court cases?  
 21 **A.** That would seem sensible.  
 22 **Q.** Did anyone do that which seemed sensible?  
 23 **A.** I can't recall, I'm afraid. I wouldn't have.  
 24 **Q.** Whose responsibility, on the POL side of the house, of  
 25 the people that we saw in the list -- do you want to go

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1 I can't remember anybody supporting that suggestion.  
 2 **Q.** Why would that be? Why would anyone not support the  
 3 suggestion that I've made: let's reveal a known fault in  
 4 the system so on that people don't proceed on a false  
 5 basis?  
 6 **A.** Yes, I think in hindsight you're probably right.  
 7 I think what you need to be able to do is "This fault  
 8 has been identified, this is the impact of it, this is  
 9 how you can check to ensure that your branch has not  
 10 been affected. The vast majority of branches have not  
 11 been affected", but giving the branch the opportunity to  
 12 check that they haven't got that problem -- something  
 13 along that kind of line.  
 14 **Q.** Was there a definitive list of those branches that were  
 15 affected?  
 16 **A.** I believe so but we depended on Fujitsu to identify  
 17 these branches.  
 18 **Q.** Given that they had seemingly delayed in the provision  
 19 of information to you promptly, was there confidence in  
 20 the definitive list that they produced?  
 21 **A.** I think there was -- personally, I think there was  
 22 a concern "Have they identified every branch", but kind  
 23 of would have felt "Well, what can I do about it?"  
 24 Fujitsu have got the information. We don't have the  
 25 information to check that. I don't know -- I wouldn't

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1 back to the list -- would it be?  
 2 **A.** Can we go back to the list?  
 3 **Q.** Yes. It's page 1.  
 4 **A.** I would probably say Alan Simpson.  
 5 **Q.** Because he's from Security?  
 6 **A.** Yes.  
 7 **Q.** So we should highlight Mr Simpson as being the person  
 8 responsible for making disclosures of this bug to POL  
 9 Legal, in order to potentially make a disclosure in  
 10 ongoing legal proceedings?  
 11 **A.** That seems sensible. I don't know if that was the  
 12 process that should or actually did take place but that  
 13 sounds a sensible summation or assumption.  
 14 **Q.** The notes for this meeting generally suggest that the  
 15 Post Office knew that knowledge of the bug should create  
 16 caution over the accuracy of some of the data that  
 17 Horizon was producing?  
 18 **A.** Yes.  
 19 **Q.** And that that could undermine confidence in Horizon?  
 20 **A.** That would be a concern, yes.  
 21 **Q.** You would know also, wouldn't you, that that information  
 22 would be relevant to subpostmasters who had been  
 23 prosecuted?  
 24 **A.** Yes.  
 25 **Q.** And those who might be prosecuted in the future?

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1 A. Yes.

2 Q. And the information would be relevant to anyone who had  
3 had proceedings brought against them by POL for the  
4 recovery of debts, civil recovery?

5 A. Yes.

6 Q. Or who had challenged POL --

7 A. Yes.

8 Q. -- in the courts.

9 Did anyone in the meeting discuss handing that  
10 information over to the defence teams?

11 A. No, I cannot recall that being mentioned.

12 Q. When you attended this meeting in September/October  
13 2010, I think you were already aware of the prosecution  
14 of Seema Misra, weren't you?

15 A. It's a name that rings a bell.

16 Q. Can we look, please, at POL00055100. Can we look,  
17 please, at the middle of the page. We can see this is  
18 an email sent to you by Jon Longman on 27 July 2010,  
19 concerning the prosecution of Seema Misra at Guildford  
20 Crown Court, yes?

21 A. Yes.

22 Q. We're going to come to that in a moment but let's get  
23 some context first. Can we look at page 2 of the  
24 document, please, and then just scroll down. This is  
25 an email from Issy Hogg, she is the defence solicitor,

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1 below following our telephone conversation of today."

2 Then go back to page 1, please, the foot of the  
3 page, an email sent on behalf of Mr Singh to Jon  
4 Longman. Can you remember who Jon Longman was?

5 A. No, I can't, no.

6 Q. And Warwick Tatford, he was prosecution counsel in the  
7 Seema Misra trial:

8 "I enclose a copy of an email received from Issy  
9 Hogg, the defence solicitors of 22 July 2010, the  
10 content of which is self-explanatory. Could you please  
11 be kind enough to let me have your urgent instructions  
12 as to the access and information she is requesting in  
13 respect of the system in the Midlands and the operation  
14 at Chesterfield and the errors logs. I will contact  
15 Gareth Jenkins to find out what transpired at the  
16 meeting with Charles McLachlan."

17 Then scroll up, please. We can see that on the  
18 same day, about an hour later, Mr Longman forwarded the  
19 email to you, yes?

20 A. Yes.

21 Q. Then we can see about 33 minutes later you reply, so at  
22 12.13 that day, and you say:

23 "John  
24 "Rod Ismay the head of P&BA is not happy at the  
25 prospect of an open ended invite. He has asked the

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1 to Jarnail Singh. If we just scroll to the top of the  
2 page, we can see on his signature block Jarnail Singh  
3 was a senior officer in the Post Office's Criminal Law  
4 Division, yes?

5 A. Yes, yes.

6 Q. If we scroll back down, please, Ms Hogg says:

7 "Jarnail,  
8 "As a result of the meeting that took place  
9 between Charles McLachlan and Gareth Jenkins as directed  
10 by the judge, we now need to have:  
11 "access to the system in the Midlands where it  
12 appears there are live, reproducible errors.  
13 "access to the operations at Chesterfield to  
14 understand how reconciliation and transaction  
15 corrections are dealt with.  
16 "access to the system change requests, Known Error  
17 Log and new release documentation to understand what  
18 problems have had to be fixed.  
19 "Please you contact me with regard to these  
20 issues. Please you respond [to an email address]."  
21 Yes?

22 A. Yes.

23 Q. Then if we go further up the page, we can see  
24 a forwarding:  
25 "... please advise on the three points raised

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1 question of what are the legal parameters we are working  
2 within. Simplistically if we refuse or impose  
3 conditions do we lose the case? I think we need more  
4 guidance on how something like this might reasonably  
5 operate.

6 "I think Mark Burley would be the route into IT to  
7 identify who might be best placed to deal with that  
8 aspect."

9 This was a reply that was essentially your boss,  
10 Rod Ismay, in P&BA, seeking to close down the disclosure  
11 request as much as possible, wasn't it?

12 A. Yes.

13 Q. What reasons did he give to close down the disclosure  
14 request as much as possible?

15 A. I can't recall any more detail than what's shown there.

16 Q. What was the nature of his unhappiness about the  
17 disclosure request?

18 A. I think he didn't feel as though it would produce  
19 anything and create more questions than it would answer.

20 Q. What kind of questions would it create?

21 A. I can't recall. I don't think he specified. I think  
22 that was probably a generic term or --

23 Q. Was it a generic reply "Don't let them have access to  
24 systems or data that would reveal issues or problems  
25 with our system"?

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1 A. No, I don't think so. I don't think -- knowing Rod,  
 2 I don't think he would view it that way. I think he'd  
 3 just struggle to understand what it was that they would  
 4 want to see and where it might lead, and there's also  
 5 an issue of confidentiality in terms of the data we're  
 6 holding, financial information regarding other branches,  
 7 for example.

8 Q. Why wasn't the reply along those lines then: there are  
 9 some practical hurdles to this, rather than just closing  
 10 it down?

11 A. Yes, I think it's the parameters that we're working  
 12 with, so, for example, other subpostmaster information.

13 Q. Why did you suggest Mark Burley would be a person who  
 14 ought to be involved?

15 A. I can't recall. I knew Mark, I worked in the product  
 16 process improvement team with him. Presumably the role  
 17 he was in at that point would seem the most appropriate  
 18 one. I think I possibly had spoken to him about it  
 19 beforehand.

20 Q. Can we turn, please, to POL00055225. This is an email  
 21 dated 13 September 2010 and you can see the subject  
 22 "West Byfleet", that was her post office  
 23 "Mrs Seema Misra". You can see who it's from and to,  
 24 not you, but we're going to see in a moment that it  
 25 references a conversation with you. It reads:

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1 refusing access that was sought by the defence?

2 A. Sorry, I thought we covered that in the previous --

3 Q. Yes, the previous email was "We need to know what the  
 4 implications are. If we refuse access will we lose the  
 5 case?"

6 A. I didn't hear any more -- I don't believe I heard  
 7 anything more from that up to this point, apart from the  
 8 fact that Rod had -- no, I can't remember if there was  
 9 anything more that developed.

10 Q. Did the reasons include that because if such access is  
 11 given then the lack of integrity of the data that  
 12 Horizon produced may be discovered?

13 A. That was never stated, no.

14 Q. Even though, by this time, you may have been aware that  
 15 there was a bug that was producing data that lacked  
 16 integrity?

17 A. Yes, but -- well, yes.

18 Q. But even if you wouldn't allow a defence solicitor or  
 19 a defence expert into the building to examine P&BA  
 20 operations or P&BA equipment, you'd presumably have  
 21 discussed, wouldn't you, "Look, there's someone on trial  
 22 for a very serious crime here based on data produced by  
 23 Horizon. She's alleging that the data's not accurate.  
 24 We know that the data produced by Horizon may not be  
 25 accurate. We need to find out a way of ensuring that

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1 "Hi John  
 2 "The last update I had on the above was in July,  
 3 the defence solicitors had requested they had access to  
 4 the operations in Chesterfield."  
 5 I think that's the email discussion we've just  
 6 seen.

7 A. Yes.

8 Q. "This was discussed by Andy Winn/Rod Ismay. I have  
 9 today spoken with Andy Winn and he has informed me that  
 10 Rod had made a decision to not allow this. Therefore  
 11 could you please update me with the latest progress on  
 12 the case."  
 13 Do you now recall any conversation with Mr Ismay?

14 A. Yes, I recall a conversation but the detail of it,  
 15 beyond "I don't think it's a good idea", and what  
 16 I stated in the previous email, I can't remember any  
 17 more detail than that, I'm afraid.

18 Q. The record here is that Mr Ismay had made a decision not  
 19 to allow it, so was bringing the shutters down on it?

20 A. I think that would be -- I can't remember what the  
 21 difference between -- in the timings was but, yes, that  
 22 would be fair summation. I don't know if anything more  
 23 had happened in between the first document that we  
 24 looked at and this one.

25 Q. What reasons were discussed between you and Ismay for

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1 she knows what we know" -- wouldn't you?

2 A. Yes, I totally understand from their point of view, yes.

3 Q. You would agree that that would be the open thing to do.

4 A. Yes.

5 Q. You would agree that would be the honest thing to do?

6 A. I think, within the concerns about data protection for  
 7 other branches and issues like that, yes.

8 Q. You would agree that that would be the thing a person  
 9 with integrity would do?

10 A. I'm not -- I think Rod laid out his reasons, his  
 11 concerns about it. I don't know if there was any  
 12 comeback from that.

13 Q. Well, the comeback would have come from you, wouldn't  
 14 it, because this was a conversation between the pair of  
 15 you?

16 A. We had the conversation I would have expected probably  
 17 to have said, "Yes, they can come in" but I've got to  
 18 say that I didn't put up any impassioned disagreement  
 19 with Rod. I accepted that he took a considered view of  
 20 things and he was my boss and, yes, I didn't put up  
 21 a fight.

22 Q. If it was the open and honest thing to do, if it was the  
 23 thing that a person with integrity would do, why did you  
 24 and Mr Ismay not do it?

25 A. Yes, I mean I've got to say -- refer to the previous

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- 1 question. That was Rod's view. I didn't have a strong  
2 enough view to argue against it.
- 3 **Q.** Were these requests by defence solicitors for access to  
4 systems and data on your mind when considering whether  
5 and how to communicate with affected subpostmasters and  
6 others the discovery of the receipts and payments  
7 mismatch bug in the September/October meeting?
- 8 **A.** No.
- 9 **Q.** Can we go back, please to Fujitsu 00081584. That's an  
10 errant reference. I'm going to stick with the version  
11 of the document I've been using, POL00028838, the second  
12 page, please. At the foot of the page under "impact",  
13 the third bullet point:  
14 "If widely known, could cause a loss of confidence  
15 in the Horizon System by branches. Potential impact  
16 upon ongoing legal cases where branches are disputing  
17 the integrity of Horizon data."  
18 This appears to be a record that those two things  
19 were brought into account at the meeting. Can I ask  
20 again: were the discussions over the defence requests  
21 for access to Horizon systems and data on your mind when  
22 considering whether to communicate with subpostmasters  
23 and others about the discovery of the receipts and  
24 payments mismatch bug?
- 25 **A.** No.

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- 1 **A.** Not that I'm aware of.
- 2 **Q.** If we just go on to page 6 of the document, this is the  
3 Gareth Jenkins document that we mentioned earlier. We  
4 know that this was sent on to the solicitor with the  
5 conduct of the Seema Misra prosecution, Jarnail Singh,  
6 on Friday, 8 October before her trial started on Monday,  
7 11 October.  
8 We can see that if we just go to the foot of the  
9 page, please. Do you see the file string at the foot of  
10 the page showing the presence of the document in  
11 a Jarnail Singh folder and that it was printed on  
12 8 October?
- 13 **A.** Yes.
- 14 **Q.** I won't turn it up now but there's also an email. I'll  
15 give the reference for the transcript, POL00055410,  
16 which shows this document being sent to Mr Singh.  
17 Was there discussion at the meeting of the need to  
18 disclose information that Mr Jenkins had to the  
19 prosecution solicitor in the Seema Misra case?
- 20 **A.** I don't recall. I don't recall that case being raised  
21 in this meeting.
- 22 **Q.** We know that neither Mr Singh nor Mr Jenkins disclosed  
23 information about the receipts and payments mismatch bug  
24 to Ms Misra's defence team or indeed to the court. Was  
25 that discussed in the course of the meeting, whether

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- 1 **Q.** What's this referring to then?
- 2 **A.** Sorry, I don't really understand which we're going.
- 3 **Q.** We've seen that at two points, once in July and once in  
4 September, you were involved in conversations over  
5 defence access to systems and data on behalf of  
6 a subpostmistress who said the data provided by Horizon  
7 is not accurate. You're in a meeting about data  
8 provided by Horizon not being accurate and there's  
9 a record saying it has a potential impact upon ongoing  
10 legal cases where branches are disputing the integrity  
11 of the Horizon data.  
12 I'm asking you were the requests that you received  
13 for access on your mind when you were considering the  
14 potential impact on legal cases that's recorded at this  
15 meeting?
- 16 **A.** I would probably say no.
- 17 **Q.** Was the discussion at this meeting over whether  
18 Mr Jenkins was going to give evidence in Seema Misra's  
19 trial in October 2010?
- 20 **A.** I've no idea.
- 21 **Q.** Was anything said about the Seema Misra case in this  
22 meeting?
- 23 **A.** I wouldn't have thought so.
- 24 **Q.** Were any decisions made about the disclosure of the  
25 existence of the bug to the defence team?

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- 1 that information should be disclosed or not?
- 2 **A.** Again, I don't remember this ex-subpostmaster being  
3 mentioned in the meeting.
- 4 **Q.** Can we go to page 2 of the document, please, and look at  
5 the foot of the page. We've dealt with the first five  
6 bullet points. Can I deal with the last -- sorry, we've  
7 dealt with the first four bullet points. Can we deal  
8 with the last, the fifth:  
9 "It could provide branches ammunition to blame  
10 Horizon for future discrepancies."  
11 Was that a consideration?
- 12 **A.** Yes.
- 13 **Q.** So disclosure could provide branches with ammunition to  
14 blame Horizon?
- 15 **A.** Yes.
- 16 **Q.** It would be accurate ammunition, though, wouldn't it?
- 17 **A.** It would be accurate in terms of there is a Horizon  
18 integrity impact which needs to be checked out before  
19 going forward. I would say that's reasonable, yes.
- 20 **Q.** So if the ammunition was an arrow, it would fly true and  
21 straight, wouldn't it?
- 22 **A.** If it was relevant to the branch, yes. I think if  
23 a branch had a discrepancy, they would be entitled to  
24 assume that before any type of prosecution, or anything  
25 like that, that it was checked that there were no error

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1 impacts on their accounts, yes.

2 **Q.** And it could be ammunition that hit the correct target;

3 namely, a discrepancy is being caused by the Horizon

4 System, not by the subpostmaster?

5 **A.** Yes.

6 **Q.** It wouldn't be information that damaged, hurt or injured

7 any subpostmaster? It's not that kind of ammunition, is

8 it?

9 **A.** It could end up working out the wrong way round because

10 the receipts and payments mismatch could produce gains

11 or losses but --

12 **Q.** That would be a good thing, though, wouldn't it, because

13 it would mean recovery to the Post Office of debt that

14 was truly owing?

15 **A.** Yes.

16 **Q.** But it wasn't seen in any of those ways, was it? It was

17 seen in the light of "we can't disclose material that

18 might undermine our system, even if the system is in

19 fact faulty".

20 **A.** Yes, I think that's probably a fair summation.

21 **Q.** Can we look over the page, please. Under "Proposal for

22 affected branches", the document reads:

23 "There are three potential solutions to apply to

24 the impacted branches. The group's recommendation is

25 that solution 2 should be progressed."

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1 **Q.** So it reflects a belief -- is this right -- that

2 whenever Fujitsu changed branch data, the branch should

3 be informed?

4 **A.** I think there's -- yes, in that kind of scenario

5 changing branch data is a very kind of wide thing. So

6 you change the price of a first class stamp every year.

7 You don't particularly ring the branch up and say we're

8 doing that. So in the scenario you're talking about

9 here, then yes, very much so.

10 **Q.** And that wouldn't be moral in the language of the

11 document here?

12 **A.** It just seems a strange terminology to me.

13 **Q.** Can you remember who made the suggestion?

14 **A.** No.

15 **Q.** Can you remember who rejected it?

16 **A.** I would have rejected it. Whether other -- and people

17 would have as well from my -- not particularly a memory

18 of that meeting but the type of thinking that NBSC

19 tended to think in the same way as me, the Networks

20 tended to think in the same way as me.

21 **Q.** Can we look at solution 3 then, please, at the foot of

22 the page. It's decided:

23 "... not to correct the data in the branches

24 (ie Post Office would prefer to write off the 'lost'

25 and then it's missing.

91

1 Can we look at solutions 1 and 3 first and then go

2 to solution 2. So solution 1:

3 "Alter the Horizon branch figure at the counter to

4 show the discrepancy. Fujitsu would have to manually

5 write an entry value to the local branch account.

6 "Impact -- when the branch comes to complete next

7 trading period, they would have a discrepancy, which

8 they would have to bring to account.

9 "Risk -- this has significant data integrity

10 concerns and could lead to questions of 'tampering' with

11 the branch system and could generate questions around

12 how the discrepancy was caused. The solution could have

13 moral implications of Post Office changing branch data

14 without informing the branch."

15 So summing up solution 1 is: the branch never

16 knows about this but there's a fix applied; is that

17 right?

18 **A.** That's fair, yes.

19 **Q.** What were the moral implications?

20 **A.** I don't understand where that came from.

21 **Q.** Can you try and help us?

22 **A.** It's just not a term I would use. I would certainly say

23 it was important that Fujitsu or -- well, presumably

24 Fujitsu, weren't changing figures willy-nilly without

25 the branch being aware of it. That shouldn't happen.

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1 "Impact -- Post Office must absorb around £20,000

2 loss.

3 "Risk -- huge moral implications to the integrity

4 of the business, as there are agents that were

5 potentially due a cash gain on their system."

6 So this is a write off. But what about the

7 subpostmasters that were owed money? That's what that's

8 raising, isn't it?

9 **A.** That's right, yes.

10 **Q.** The answer to that isn't really given in solution 3, is

11 it?

12 **A.** I think that was probably one that we could do this but

13 we're never seriously going to do it.

14 **Q.** Who made the suggestion?

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

16 **Q.** Who rejected it?

17 **A.** Well, I would have, along with other colleagues, I would

18 imagine.

19 **Q.** Solutions 1 and 3, is this -- I'm sorry.

20 **A.** I would suggest that the options were probably driven by

21 Fujitsu's suggestion for us to consider but that's

22 a suggestion.

23 **Q.** Solutions 1 and 3 keep subpostmasters in the dark, don't

24 they?

25 **A.** Yes.

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1 Q. Both those subpostmasters who are known to be affected  
 2 by the bug and the wider subpostmaster community?  
 3 A. Yes.  
 4 Q. Solution 2 was the recommended solution, if we read  
 5 that, please:  
 6 "P&BA will journal values from the discrepancy  
 7 account into the customer account and recover/refund via  
 8 normal processes. This will need to be supported by an  
 9 approved POL communication. Unlike the branch POLSAP  
 10 remains in, balance albeit with an account discrepancies  
 11 that should be cleared.  
 12 "Impact -- POL will be required to explain the  
 13 reason for a debt recovery/refund even though there is  
 14 no discrepancy at the branch.  
 15 "Risk -- could potentially highlight to branches  
 16 that Horizon can lose data."  
 17 The end of the first line/beginning of the second:  
 18 "This will need to be supported by an approved POL  
 19 communication."  
 20 Would the approved communication leave out some of  
 21 the facts?  
 22 A. I'd probably need to see the communication to comment on  
 23 that. I don't think that would be the intention of that  
 24 solution. It doesn't suggest let's do it. But I think  
 25 it would be -- what that would be saying is that it

1 position might have been. I wasn't at that kind of  
 2 level so.  
 3 Q. You're assuming it on the basis of some facts or  
 4 information, though, aren't you? You're not just  
 5 guessing?  
 6 A. No, I think there was a feeling (and I use that term  
 7 carefully, a "feeling") that when we got on to these  
 8 issues calls, it was more the kind of ground roots,  
 9 people in the NBSC, Network and myself in finance, who  
 10 were, "This is what's happened, let's tell them, let's  
 11 tell them exactly what's gone off and this is what we've  
 12 done to resolve it". Whereas there seemed to be more --  
 13 possibly more strategic, dare I say, view from more  
 14 senior managers of "should we really be telling  
 15 everybody that this has happened?"  
 16 Now, that's tarring every senior manager with  
 17 a brush that's unfair, but there was a feeling that  
 18 there was a bit more resistance to communication kind of  
 19 the higher things went, which I don't know if there was  
 20 a pressure that they were being given under or whether  
 21 that was a more general way of just thinking rather than  
 22 somebody else providing pressure. I don't know.  
 23 Q. But looking at senior management collectively, and  
 24 without identifying individuals, your clear  
 25 understanding was that senior management expected or

1 would probably need to be checked off at legal level  
 2 before we send it. That's my assumption.  
 3 Q. Was there a feeling at this meeting that the principle  
 4 of the less said, the soonest mended should be applied?  
 5 A. No, I don't think so. I think the less said would be  
 6 the clean it up without telling the branches.  
 7 Q. The less that subpostmasters know, the better?  
 8 A. No. I think again it comes back to let's let the  
 9 subpostmasters that are impacted know what's happened  
 10 and what we've done to resolve an issue even if they  
 11 potentially didn't know they had an issue, but I don't  
 12 think it was ever suggested to do a branch-wide  
 13 communication.  
 14 Q. What would POL senior management have said if the  
 15 outcome of the receipts and payments mismatch meeting  
 16 was a recommendation that the whole of the network  
 17 should be warned of this potential problem?  
 18 A. I think they would have said no.  
 19 Q. Why is that?  
 20 A. Because they were keen to maintain the integrity of  
 21 Horizon as far as possible, but --  
 22 Q. When you say, "They were keen to maintain the integrity"  
 23 do you mean keen to maintain the appearance of  
 24 integrity?  
 25 A. Yes. But again I'm assuming what the manager's -- his

1 required you to stick to the message that Horizon had  
 2 integrity?  
 3 A. Yes.  
 4 MR BEER: Sir, I wonder whether we might take the lunch  
 5 break early?  
 6 SIR WYN WILLIAMS: Certainly.  
 7 MR BEER: And come back at 1.45.  
 8 SIR WYN WILLIAMS: Yes, that's fine. See you then.  
 9 MR BEER: Thank you very much, sir.  
 10 (12.49 pm)  
 11 (Luncheon Adjournment)  
 12 (1.45 pm)  
 13 MR BEER: Good afternoon, sir. Can you see and hear me?  
 14 Sir, you are still on mute. I think that was a yes.  
 15 Can you see and hear us, sir? (Pause)  
 16 Sir, can you see and hear us? Can we just pause  
 17 while that's sorted out. (Pause)  
 18 We'll break for five minutes, if that's possible,  
 19 please, whilst we restore the link. So five minutes.  
 20 Thank you.  
 21 (1.47 pm)  
 22 (A short break)  
 23 (1.50 pm)  
 24 MR BEER: Thank you very much, Mr Winn.  
 25 A. Sorry to have delayed everyone.



1 **MR BEER:** Can I just check, sir, that you can see and hear  
 2 me?  
 3 **SIR WYN WILLIAMS:** Well, I can hear you. I now can't -- now  
 4 I can see you as well. So we're fine.  
 5 **MR BEER:** Fantastic, thank you.  
 6 Mr Winn, when I was asking questions before lunch  
 7 about the date of the receipts and payments mismatch  
 8 bug, the meeting about that, and one of the actions  
 9 arising from it (namely, whose job it was, if anyone's,  
 10 to inform lawyers in ongoing or past prosecutions and  
 11 civil proceedings about the bug), I mentioned a document  
 12 that I gave the reference to but did not display. Can  
 13 I display the document for you, please. It's  
 14 POL00055410.  
 15 If we look at the lower email first, please,  
 16 you'll see that it's from Alan Simpson and it's dated  
 17 8 October 2010 and Alan Simpson, we can see from his  
 18 signature block, was the POL information security  
 19 incident senior. You can see that it's to Rob Wilson.  
 20 Mr Wilson was the head of criminal law in the Criminal  
 21 Law Division within Post Office at the time.  
 22 Did you know that --  
 23 **A.** No, I don't think I came across him at all.  
 24 **Q.** It helps us on two things if we can just read it. It  
 25 says:

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1 **A.** Yes.  
 2 **Q.** It would appear that the meetings, plural, were held in  
 3 the week ending Friday, 8 October. Do you see that?  
 4 **A.** Yes, I can see that.  
 5 **Q.** "My concern is around the proposed solution/s, one or  
 6 more of which may have repercussions in any future  
 7 prosecution cases and on the integrity of the Horizon  
 8 Online system."  
 9 So Mr Simpson is referring the issue to the head  
 10 of criminal law about future prosecutions based on data  
 11 produced by Horizon Online. Do you remember whether  
 12 there was any discussion about disclosure of the bug to  
 13 those conducting current prosecutions, based on data  
 14 produced by Legacy Horizon?  
 15 **A.** No, I wouldn't be aware of that, no.  
 16 **Q.** Can you recall that being discussed in the meeting?  
 17 **A.** In this meeting?  
 18 **Q.** Yes, in the meeting that we saw the notes of this  
 19 morning.  
 20 **A.** Not in detail but I would imagine it would be mentioned,  
 21 yes.  
 22 **Q.** Was this seen as a bug that just afflicted Horizon  
 23 Online?  
 24 **A.** As far as I can recall, yes.  
 25 **Q.** What exploration was there of whether this was a bug

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1 "I am forwarding you the attachments above in  
 2 relation to a series of incidents ..."  
 3 If we just scroll up, please, we can see that  
 4 under the attachments there are two that are mentioned,  
 5 "ReceiptsPayments notes[version]5". That appears to be  
 6 a version of the notes that we looked at earlier  
 7 concerning a meeting or meetings about the receipts and  
 8 payments mismatch bug.  
 9 Then "Lost Discrepancies [29 September 2010]",  
 10 that appears to be Mr Jenkins' document of 29 September  
 11 2010 that we looked at earlier.  
 12 Just going back down to the email:  
 13 "I am forwarding you the attachments above in  
 14 relation to a series of incidents, identified by Fujitsu  
 15 this week, whereby it appears that when posting  
 16 discrepancies to the local suspense, these amounts  
 17 simply disappear at branch level, and a balance is  
 18 shown.  
 19 "The above includes Fujitsu's initial analysis  
 20 [that appears to be a reference to Mr Jenkins'  
 21 documents] and proposed solution/s, whilst the other  
 22 documents the outputs from various meetings held this  
 23 week."  
 24 That appears to be a reference, would you agree,  
 25 to the note of the meeting that we saw?

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1 that afflicted Legacy Horizon?  
 2 **A.** I wasn't aware of any.  
 3 **Q.** Thank you. That can come down.  
 4 Can we move forward, please, to December 2010 and  
 5 look at POL00029718. Can we start, please, on page 8 of  
 6 this collection and scroll down, please. This is  
 7 an email from Emma Langfield to a number of people,  
 8 including you and Mr Jenkins, dated 24 December 2010.  
 9 Can you see that?  
 10 **A.** Yes.  
 11 **Q.** She's asking for help there as there are some branches  
 12 for whom values appear marooned in the P&BA discrepancy  
 13 account. If you just scroll down. It says:  
 14 "Morning  
 15 "Please see below from [P&BA]. They have  
 16 identified some branches where values appear marooned in  
 17 the P&BA discrepancy account ..."  
 18 Yes?  
 19 **A.** Yes.  
 20 **Q.** And that they:  
 21 "... either appear not to align to the values and  
 22 last Fujitsu spreadsheet or have not been identified as  
 23 part of this issue."  
 24 Then there are a number of emails exchanged as  
 25 part of this collection of emails, with ultimately

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1 a response from Mr Jenkins on page 1 of this collection.  
 2 We see this is an email from him to you moving forward  
 3 a number of years to May 2012. He says:  
 4 "Sorry it has taken me so long to get back to you.  
 5 "I've had a trawl back through my old emails and  
 6 what I've found is the following ..."  
 7 He sets out in his paragraphs 1, 2 and 3 what he's  
 8 discovered in relation to two branches that were in the  
 9 original list, associated with the lost discrepancy  
 10 issue that had occurred in 2010. Then in paragraph 4 he  
 11 says:  
 12 "I can also see that although [a branch number]  
 13 was in the original list, it seems to know dropped off  
 14 very early. This is because it wasn't in the original  
 15 list from POL and also the precise symptoms in terms of  
 16 [something] left behind were different. I can't find  
 17 any trace of any further investigation of this in my  
 18 emails.  
 19 "Given that the discrepancy amounts in both cases  
 20 was very large, I'd be surprised if they weren't  
 21 properly investigated at the time, but they don't seem  
 22 to be included in the lists relating to the '[something]  
 23 Discrepancy' investigation.  
 24 "If you want this followed up further I suggest  
 25 you raise it with the POL Problem Management team (Emma  
 101

1 taken back in September/October 2010, we've seen the  
 2 documents around that, may this suggest that the  
 3 follow-up on the impact on branches was taken less  
 4 seriously?  
 5 **A.** I can't really say.  
 6 **Q.** Did the Post Office take seriously the need to  
 7 understand the full impact of this significant issue  
 8 and, in particular, the impact on individual branches  
 9 and subpostmasters and ensure that all affected branches  
 10 were identified and there was a proper investigation?  
 11 **A.** Yes, as far as I was aware.  
 12 **Q.** Can we turn, please, to POL00098016. This continues the  
 13 thread of discussion on the two outstanding queries on  
 14 the receipts and payments mismatch bug and we're now  
 15 ahead to April 2013. Can we go, please, to page 4 of  
 16 the thread to begin it.  
 17 At the foot of the page, please, you will see  
 18 an email from David Wright, who was I think an IT  
 19 service adviser in service management, and it's an email  
 20 to Andy Dunks and Penny Thomas, Steve Bansal, Scott  
 21 Somerside and to you?  
 22 **A.** Yes.  
 23 **Q.** It reads "Andy", and I don't think that's you, that's  
 24 the Andy Dunks that that was addressed to; is that  
 25 right?  
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1 Langfield), who can then get the Fujitsu Problem  
 2 Management team to dig further."  
 3 So this is correspondence under two years after  
 4 the problem was discovered and there appears, would you  
 5 agree, to have been some doubt as between Fujitsu and  
 6 POL over which branches had been investigated as  
 7 possibly impacted and which had not?  
 8 **A.** Yes.  
 9 **Q.** At the very least, no shared understanding of what had  
 10 happened?  
 11 **A.** Yes.  
 12 **Q.** Who was responsible for investigating and understanding  
 13 the extent of the problem and updating the branches  
 14 affected?  
 15 **A.** In terms of updating the branches, I would probably  
 16 suggest that that was P&BA. In terms of investigating,  
 17 I would imagine that would be the IT team.  
 18 **Q.** But you have got in 2012 here Mr Jenkins saying that,  
 19 according to the documents that he can access, there's  
 20 a branch with a very large discrepancy -- two branches  
 21 with a very large discrepancy and they don't seem to be  
 22 included in the list. Would you regard that as  
 23 problematic?  
 24 **A.** Yes.  
 25 **Q.** Given the seriousness with which the mismatch bug was  
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1 **A.** I would think so, yes.  
 2 **Q.** "Andrew Winn (Relationship Manager, Financial Service  
 3 Centre) has requested Service Management assistance in  
 4 reopening Fujitsu investigations for two outstanding  
 5 enquiries he has been dealing with for our branches.  
 6 "At our recent service review meeting held with  
 7 Leighton Machin he suggested your names as the  
 8 appropriate contacts. Gareth Jenkins has also been  
 9 approached in the past.  
 10 "I have attached some information previously  
 11 sharing via email but if you need more detail to help  
 12 you resolve these incidents, please approach Andy Winn  
 13 direct."  
 14 Then they give your details.  
 15 Then if we go up the chain, please, to page 3  
 16 we'll see that a chaser is sent on 22 February. Just  
 17 scroll down, please. Keep going, please. Yes, that's  
 18 it, 22 February:  
 19 "Hi Leighton,  
 20 "I've just picked up a reply from an enquiry  
 21 I made to Andy Winn in our Finance Service Centre (he  
 22 has been on leave) and disappointingly he has not heard  
 23 anything from the contracts you suggested last month.  
 24 "Can you escalate the enquiry on our behalf?"  
 25 So that's essentially a chaser, would that be  
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1 right, from somebody that worked to you, David Wright?  
 2 **A.** I think I remember David vaguely, I think he might have  
 3 been working in NBSC at that time but I'm not sure he  
 4 wasn't in P&BA Or Finance Service Centre, as it was  
 5 then.

6 **Q.** You can see his signature block there and he appears to  
 7 be based in Dearne House in Barnsley?

8 **A.** Right, okay.

9 **Q.** Does that mean he was working for you or not?

10 **A.** No.

11 **Q.** Anyway it's a chaser, and then if we go back to page 3,  
 12 please, at the foot of the page, another chaser a month  
 13 later on 5 March. It's not month later, it's the  
 14 following month:

15 "Hi Leighton

16 "Were you able to escalate this on our behalf?"

17 Then a reply from Fujitsu:

18 "Apologies ... It seems it was not cascaded at the  
 19 point of your last request (I will cascade it now!)

20 "A response in one form or another will be  
 21 provided by [close of play] Thursday."

22 Then up to the bottom of page 2, please,

23 Mr Wright:

24 "Hi Leighton

25 "Did a response get issued on Thursday? I have

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1 "I need to be clear that there is no unresolved  
 2 problem in case either branch appears in the ongoing  
 3 Horizon integrity review.

4 "I know you have previously stated that a work  
 5 plan was set up to do some further analysis on [one of  
 6 the branches] but [the Post Office] requested this not  
 7 to proceed but I need to understand why they disappeared  
 8 from the resolved spreadsheet."

9 So what you were doing, you were saying that  
 10 there's an issue that's now two to three years old --

11 **A.** Yes.

12 **Q.** -- and there are two branches that are maybe affected in  
 13 different ways but I want a resolution?

14 **A.** Yes, I think from what I remember is that they were on  
 15 an initial list, a kind of quite big list at the time,  
 16 and Fujitsu said these have got an issue but they're not  
 17 the same as the receipts and payments, so we need to  
 18 separate them, if I remember correctly.

19 **Q.** For one of them, you had made a deduction -- the Post  
 20 Office had made a deduction from the SPM's remuneration?

21 **A.** Yes. Well, that's what it reads there.

22 **Q.** You say:

23 "I need to be clear that there is no unresolved  
 24 problem in case either branch appears in the ongoing  
 25 Horizon integrity review."

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1 not received it -- did it just go to Andy?"

2 Then up to the bottom of page 1, please, thank  
 3 you. Steve Bansal to a collection of people including  
 4 you:

5 "... accept my apologies thought as I thought I'd  
 6 sent this mail some weeks ago."

7 He answers a query about Paystation transactions.  
 8 Do you see that in his third paragraph?

9 **A.** Yes.

10 **Q.** "So to answer the question very Paystation  
 11 transactions", which is something else, yes?

12 **A.** Yes.

13 **Q.** Then you reply that top of the page, if we go to the top  
 14 of the page. On 16 April 2013, you say:

15 "Hi Steve

16 Yes it does ...

17 "However I'm far more concerned about the  
 18 outstanding enquiry relating to the receipts & payments  
 19 problem back in 2010 where we have two branches [and you  
 20 identify them] who appeared [to be] on the initial list  
 21 of branches but not on the list of those resolved. We  
 22 still have a large unexplained credit on one branch  
 23 whilst we have recovered money from pay on the other  
 24 despite them recording a significant surplus at the  
 25 time.

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1 Why would you need to be clear that there's no  
 2 unresolved problem for that purpose, rather than because  
 3 in one case the subpostmaster might owe money and in the  
 4 other case the subpostmaster is owed money.

5 **A.** There would be no difference between the two. The issue  
 6 needs to be resolved.

7 **Q.** But why was it important in case either branch appears  
 8 in the ongoing integrity review? Wouldn't it be a good  
 9 enough reason that we've taken some money out of  
 10 a subpostmaster's wages, perhaps wrongfully, that I need  
 11 an answer?

12 **A.** I would say any branch that we know has got a problem we  
 13 need to resolve it as quickly as possible.

14 **Q.** But we're two or three years on now?

15 **A.** Yes.

16 **Q.** Was it because the decks needed to be cleared because  
 17 you didn't want cases like this showing up in the  
 18 integrity review, as you call it?

19 **A.** I don't think it was anything to do with debts, I think  
 20 it was to do with branches like that shouldn't have  
 21 issues that need resolving three weeks old, never mind  
 22 three years.

23 **Q.** So the bug was a significant issue for the Post Office?

24 **A.** Yes.

25 **Q.** It was covered in 2010 at some point. Was it causing

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1 you some considerable concern, even aside from the  
 2 integrity review, that by 2013 you still didn't have  
 3 a clear picture as to who was affected and how?  
 4 **A.** No, because my belief was that if there was  
 5 a discrepancy -- if the receipts and payments impacted  
 6 a branch, then the balancing amount would land in our  
 7 discrepancy account and we'd got the discrepancy account  
 8 cleared down so that we could see any figure that was --  
 9 because normally in a discrepancy account you would do  
 10 your branch trading, money would go into the discrepancy  
 11 account, the subpostmaster would pay it or we'd repay  
 12 the postmaster, and that amount would clear down to  
 13 zero. So basically the account, at that kind of time,  
 14 in 2013, was very clean.  
 15 So if any branch had a receipts and payments  
 16 mismatch, we would see it eventually, not in  
 17 a particularly timely manner, but we start seeing  
 18 figures rolling forward.  
 19 **Q.** Can I turn to a different issue. That document can come  
 20 down, please.  
 21 Can we look -- and this is to do with remote  
 22 access -- at POL00023432. Can we look at the second  
 23 page first, please. Just to explain, the reason I'm  
 24 asking you these questions is because they concern your  
 25 engagement with subpostmasters and your knowledge about

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1 "I have attached notes of the interview should you  
 2 want to refer to them although they are rather long.  
 3 There are two issues which the suspended subpostmaster,  
 4 Graham Ward, raised ..."  
 5 So just some context here, stopping at that point,  
 6 Graham Ward was a subpostmaster at that branch, the  
 7 Rivenhall branch, whose contract was terminated, we know  
 8 whose appeal against contract termination was dismissed,  
 9 who became one of the 555 Claimants in the Group  
 10 Litigation and who is a Core Participant in this  
 11 Inquiry. His evidence was read to the Chairman in the  
 12 course of the Human Impact hearings last year.  
 13 In short, he's a subpostmaster who lost his job,  
 14 whose marriage broke down and who was left in debt with  
 15 four young children.  
 16 Now, Mr Lusher encloses the interview transcript  
 17 and gives a summary. Let's read the summary together:  
 18 "1. He claims that on a number of occasions  
 19 figures have appeared in the cheques line of his  
 20 account. He suspects these have been input into his  
 21 account electronically without his knowledge or consent.  
 22 He is certain that he has cleared and remmed out cheques  
 23 in the correct way and tells me that cheques must be  
 24 properly cleared on the system to progress to a new  
 25 account."

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1 remote access. So the chain starts, and it's only a two  
 2 email chain, from Mr Lusher -- can you see that at the  
 3 foot of the page -- who is a contracts adviser in the  
 4 network support team in Norwich.  
 5 **A.** Yes.  
 6 **Q.** Just explain shortly what that role involved.  
 7 **A.** They are responsible for making sure that the contracts  
 8 were applied to subpostmasters and for -- by the  
 9 subpostmasters. They would be, if I remember right,  
 10 responsible for signing off any debt recoveries, major  
 11 debt recoveries. I never really saw a job description.  
 12 But contracts managers, we were regularly -- they would  
 13 be involved in becoming aware of debt and so there would  
 14 be quite a lot of conversation, communication between  
 15 contract managers and myself, some more than others.  
 16 **Q.** If we go to the top of the page, we can see it's  
 17 an email from Mr Lusher to you of 15 October 2008, and  
 18 he says:  
 19 "Hi Andrew  
 20 "I spoke to you a few days ago about a suspension  
 21 at Rivenhall. From our conversation, I believe that you  
 22 had a good understanding of the problem and I would be  
 23 grateful for further guidance. Rivenhall is a one  
 24 position rural branch -- the only abnormal product being  
 25 an ATM.

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1 Just stopping there, can you explain what you  
 2 understand from what is being described there from  
 3 Mr Ward's account?  
 4 **A.** What he's saying is that he's seeing cheques appear on  
 5 his cheque line that he doesn't believe he has taken and  
 6 input to the Horizon System.  
 7 **Q.** What does he seeing checks appearing on his cheque line  
 8 mean?  
 9 **A.** You can pull up a cheque holdings at any point which  
 10 will show the values that have been input there and that  
 11 will be what he's seeing.  
 12 **Q.** He is saying that he has cleared and remmed the cheques.  
 13 What does he mean by that?  
 14 **A.** So at end of day you would -- well, not necessarily at  
 15 the end of the day, when the postman arrives for, say,  
 16 4.00, just before then you will look to see what cheques  
 17 you've got, check them against your cheque line, make  
 18 any adjustments if need be because people will make  
 19 mistakes of pressing cash, like they do every time. So  
 20 you need to introduce a cheque there. Rem out the  
 21 cheques. I can't remember the order of it but basically  
 22 you rem out the cheques which means you're dispatching  
 23 them --  
 24 **Q.** You handed the cheque over?  
 25 **A.** That's what you're telling the system. That wouldn't --

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1 you'd do that at the same time but not precisely the  
 2 same time and you would need to clear the cheque line,  
 3 cheque account.  
 4 **Q.** I've received a cheque from somebody I've now passed  
 5 the cheque on?  
 6 **A.** That's right.  
 7 **Q.** In physically pass the cheque on?  
 8 **A.** Yes, that's what he's telling Horizon. There is a bit  
 9 and I'm afraid I can't describe it properly but there is  
 10 two elements to the process. One is the remitting out of  
 11 the cheques and the other one is to clear the cheque  
 12 line. It sounds -- now it sounds -- there was some  
 13 logic to it but, at the moment, I can't explain why rem  
 14 out isn't there. But it did cause problems in terms of  
 15 if you get distracted and you forget you are doing it  
 16 and that can result in cheques appearing when you don't  
 17 expect them to be.  
 18 **Q.** What he is saying is that he's certain he has cleared  
 19 and remitted out the cheques and yet there are some  
 20 cheques appearing on his cheque line which suggests that  
 21 he is still sitting on cheques?  
 22 **A.** Yes.  
 23 **Q.** He paragraph 2:  
 24 "He has made good about £10,000 and not made good  
 25 about £11,000 of the shortages which arise from these  
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1 £200 example.  
 2 **A.** Yes.  
 3 **Q.** You would agree, I think, that this is a very serious  
 4 issue being raised?  
 5 **A.** Yes, if it's backed up, yes.  
 6 **Q.** It's serious for the subpostmaster, would you agree,  
 7 because on his account he's lost £10,000 of his own  
 8 money, yes?  
 9 **A.** Yes. Oh, yes.  
 10 **Q.** The system is showing that he owes a further £11,000.  
 11 It's serious for that reason, would you agree?  
 12 **A.** Yes.  
 13 **Q.** It's serious for him because he's been suspended?  
 14 **A.** Yes.  
 15 **Q.** And it's serious for him because his contract might be  
 16 terminated and he would lose his job and his livelihood?  
 17 **A.** Yes.  
 18 **Q.** It's serious, would you agree, for the Post Office  
 19 because if a subpostmaster's saying that the system  
 20 that's used across the country has introduced a phantom  
 21 sum into his cheque line of account, that's very  
 22 serious?  
 23 **A.** Yes.  
 24 **Q.** If it's correct, it's a serious issue with the Horizon  
 25 System?  
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1 figures. He claims that because of the abnormal nature  
 2 of these entries, the shortages have not just rolled  
 3 over from one branch trading statement to the next, but  
 4 have accumulated -- each being added to the last (eg if  
 5 the account in period one showed a shortage of £100  
 6 which was not made good, then the shortage shown in  
 7 period 2 would be £200)."  
 8 Then just scroll down a little bit:  
 9 "The subpostmaster's contract remain suspended.  
 10 I would be very grateful for your expert comment and  
 11 advice."  
 12 You would agree that the account summarised by  
 13 Mr Lusher of what Mr Ward was saying was a clear and  
 14 coherent one?  
 15 **A.** It appears it, yes.  
 16 **Q.** He's saying he has put £10,000 of his own money in  
 17 already but he's not made good another £11,000 of  
 18 loss --  
 19 **A.** Yes.  
 20 **Q.** -- and he's saying that the system's magnifying the  
 21 loss, even without him doing anything by simply moving  
 22 from one trading period to the next.  
 23 **A.** Well, more than that. It's doubling up every trading  
 24 period.  
 25 **Q.** Yes it's magnifying, doubling up. He uses the £100 to  
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1 **A.** Yes.  
 2 **Q.** Can we turn to your response, please, page 1. You  
 3 respond on 23 October, so his email was the 15th, this  
 4 is 23 October 2008, and you say:  
 5 "1. The only way POL can impact branch accounts  
 6 remotely is via the transaction correction process."  
 7 Reading a couple of sentences on -- sorry I will  
 8 read the next sentence:  
 9 "These have to be seared by the branch in the same  
 10 way that in/out remittances are I guess. If we were  
 11 able to do this, the integrity of the system would be  
 12 flawed. Fujitsu have the ability to impact branch  
 13 records via the message store but have extremely  
 14 rigorous procedures in place to prevent adjustments  
 15 being made without prior authorisation -- within POL and  
 16 Fujitsu."  
 17 Now, in your witness statement, you say that you  
 18 were aware that Fujitsu had what you describe as remote  
 19 access and this is an email suggesting you knew at least  
 20 by 2008, yes?  
 21 **A.** Yes.  
 22 **Q.** And --  
 23 **A.** I would say that my response there was a repetition of  
 24 a -- I would imagine from this point I went to someone  
 25 in Fujitsu or our IT side, asked them that question that  
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1 Alan had posed and repeated it back there. I don't  
 2 think that kind of would have come just from me.  
 3 **Q.** Well, I was going to suggest this first part of  
 4 paragraph 1 suggests some familiarity by you with  
 5 Fujitsu's access controls, doesn't it?  
 6 **A.** As a result of me -- Alan posed the question "Can we  
 7 get -- can there be remote access" and I will have asked  
 8 the question based on that question.  
 9 **Q.** How had you satisfied yourself as to the security of the  
 10 Fujitsu access controls?  
 11 **A.** I don't think I did.  
 12 **Q.** How could you be satisfied that they were being  
 13 monitored effectively by Fujitsu?  
 14 **A.** I couldn't.  
 15 **Q.** We know from some evidence that a man called Richard  
 16 Roll gave in the Group Litigation and indeed from  
 17 documents disclosed by Fujitsu to us in this Inquiry,  
 18 that Fujitsu's third line of support were routinely  
 19 using their ability to go into the system in a way that  
 20 was described by them as "off piste". Did you know  
 21 about that?  
 22 **A.** No.  
 23 **Q.** That wasn't in accordance with the regularisation  
 24 controls and protocols that were in place?  
 25 **A.** Yes, I wasn't aware of that.

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1 **A.** I'm saying that from -- without any legal background to  
 2 give me the authority to say that.  
 3 **Q.** You say that Mr Ward made a "casual accusation". In  
 4 what respect was it casual?  
 5 **A.** He didn't present any evidence to support his claim.  
 6 **Q.** Casual means free and easy, doesn't it?  
 7 **A.** Bad choice of words, sorry.  
 8 **Q.** Sorry?  
 9 **A.** A bad choice of wording at the time.  
 10 **Q.** Is that what this is? I mean, "casual" means without  
 11 thought, free and easy, something just falls from the  
 12 lips without any real thought being given to it. How  
 13 did you know it was a casual observation, a casual  
 14 accusation?  
 15 **A.** As I say, I cannot recall what investigation I carried  
 16 out at the time.  
 17 **Q.** Whether you carried out an investigation or not doesn't  
 18 tell us why you suggested to Mr Lusher that this  
 19 subpostmaster was making a casual accusation, does it?  
 20 **A.** I've already acknowledged that the term "casual" wasn't  
 21 well used.  
 22 **Q.** You didn't know whether it was a casual accusation or  
 23 not, did you?  
 24 **A.** I'm sorry, I feel as though we're going round in  
 25 circles. I would have carried out an investigation.

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1 **Q.** So what evidence did you have to believe that Fujitsu  
 2 were following protocol?  
 3 **A.** Just what I'd been told.  
 4 **Q.** Who had told you that?  
 5 **A.** I don't know.  
 6 **Q.** But you had been told something by the subpostmaster?  
 7 **A.** Yes.  
 8 **Q.** Why did you accept what Fujitsu were telling you rather  
 9 than what the subpostmaster was telling you?  
 10 **A.** I'm not sure if I did. I'm not sure what research  
 11 I did, investigation into the branch.  
 12 **Q.** Anyway, you continue:  
 13 "These controls form the core of our court defence  
 14 if we get to that stage. He makes a casual accusation  
 15 that is extremely serious to the business. As usual he  
 16 should either produce the evidence for this or withdraw  
 17 the accusation."  
 18 By saying these controls form the core of our  
 19 court defence, you were indicating to Mr Lusher, weren't  
 20 you, that it was okay to say to Mr Graham Ward that the  
 21 Post Office was prepared to go all the way here "We're  
 22 willing to stand up in court and defend Horizon and its  
 23 operation by Fujitsu", weren't you?  
 24 **A.** Yes, I think so, yes.  
 25 **Q.** You say that --

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1 I assume I would have carried out an investigation.  
 2 **Q.** There's no reference to an investigation in this email  
 3 by you.  
 4 **A.** Okay.  
 5 **Q.** Is there?  
 6 **A.** I don't know. I can't see the full email.  
 7 **Q.** Have a look at the full email. *(Pause)*  
 8 **A.** Can we move it down a little bit?  
 9 **Q.** Yes, yes, please do.  
 10 There's no reference in that to you carrying out  
 11 an investigation at all, is there?  
 12 **A.** That's correct.  
 13 **Q.** So I'll ask again: how did you know that this was  
 14 a casual accusation by Mr Ward?  
 15 **A.** Reading that, I should have done an investigation.  
 16 **Q.** You say that that accusation, if we just go back up to  
 17 paragraph 1, and in the second part of paragraph 1,  
 18 starting "These controls", in the second sentence:  
 19 "He makes a casual accusation that is extremely  
 20 serious to the business."  
 21 Can you see that?  
 22 **A.** Yes.  
 23 **Q.** Why was it extremely serious to the business?  
 24 **A.** Because if the accusation was correct, then that would  
 25 support the lack of integrity into the system.

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1 Q. Why was the seriousness of the business seemingly your  
2 principal concern, rather than the merits of the issue  
3 that had been raised by this subpostmaster?  
4 A. I think the nature of the business at -- the state of  
5 play within the business at that time, with the concern  
6 about Horizon integrity.  
7 Q. This is 2008. This is before the *Computer Weekly*  
8 article had broken.  
9 A. Okay.  
10 Q. Was the integrity of the business your principal concern  
11 rather than the actual merits of an issue that had been  
12 raised by a subpostmaster?  
13 A. No, I would say exactly the opposite and I'm not happy  
14 about this.  
15 Q. You're not happy about?  
16 A. About my actions on this one --  
17 Q. You continue --  
18 A. -- or lack of action.  
19 Q. You continue:  
20 "As usual he should either produce the evidence  
21 for this or withdraw the accusation."  
22 This was a subpostmaster saying that the system  
23 was introducing phantom figures information his cheque  
24 line.  
25 A. Yes.

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1 Q. Who had determined that it was for subpostmasters to  
2 prove that what they were saying was true, rather than  
3 raising an issue and it being investigated by P&BA?  
4 A. The --  
5 Q. Before we'll start an investigation, you've got to  
6 prove what you say is true, otherwise we won't start  
7 an investigation.  
8 A. No. No, I think -- I think this probably suggests that  
9 this was done in the very early days of me taking on the  
10 role. Would that tie up with dates? I would say that  
11 I got significantly better at my job as I gained  
12 experience on doing it and I'm not happy looking at  
13 this.  
14 Q. You commenced that sentence:  
15 "As usual he should ..."  
16 That suggests a stock line, doesn't it?  
17 A. Well, so the bulk of what you are looking at is  
18 disputing transaction corrections, that was at that time  
19 probably the bulk of my work. So if a subpostmaster  
20 said "This transaction correction isn't correct", we'd  
21 ask them why they're saying that. So "we provided the  
22 evidence for the transaction correction, what are you  
23 producing to suggest it's not correct?" I think I would  
24 have -- if this would have been three or four years  
25 later, I think I would have dealt with it in

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1 Q. How could he possibly produce evidence of that?  
2 A. You can print the cheque listing reports. It can be  
3 printed out. So he could have done before and after  
4 with the remitting out of cheques. So if he remitted out  
5 £100 of cheques and then it reappears again, then those  
6 receipts --  
7 Q. So why didn't you say that? "Just show us these". You  
8 are being very combative here, aren't you? "He makes  
9 a casual accusation" --  
10 A. Yes.  
11 Q. -- "that is extremely serious to the business ... he  
12 should either produce evidence or withdraw it."  
13 A. Yes, I would agree that this is not the kind of letter  
14 I would typically write.  
15 Q. You seem concerned that he was slandering the business,  
16 don't you?  
17 A. Not really.  
18 Q. Produce evidence or withdraw that accusation, is what  
19 you're saying here, aren't you?  
20 A. Yes.  
21 Q. Would you put the reputation of the business ahead of  
22 investigating the merits of what was being said by  
23 a subpostmaster?  
24 A. No, that would not be the way I would like to think  
25 I approached a job.

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1 a completely different way.  
2 Q. In paragraph 2, you say:  
3 "What 'the abnormal nature of these entries'  
4 means, I assume no-one knows."  
5 He was saying that figures appeared in his cheque  
6 line of account without his knowledge or consent.  
7 That's pretty abnormal, isn't it?  
8 A. Mm-hm.  
9 Q. Why were you saying "What" -- quoting back to him, to  
10 Mr Lusher -- "'the abnormal nature of these entries'  
11 means, I assume no-one knows", when it was perfectly  
12 obvious that they were abnormal, they were phantom  
13 figures appearing in the cheque line? Why were you  
14 taking that point when it was perfectly clear what this  
15 subpostmaster was saying?  
16 A. I can't respond to that, sorry.  
17 Q. You continue:  
18 "The implication is that he acknowledges that when  
19 he 'made good' at branch trading he did not and  
20 falsified his branch trading statement and rolled the  
21 loss forward."  
22 You were being told by Mr Lusher that the  
23 subpostmaster had put £10,000 of his own money in,  
24 weren't you, in the previous email?  
25 A. Yes.

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1 Q. And you here appear to be criticising the subpostmaster  
2 for doing so, saying that he's guilty of falsification,  
3 aren't you? When he made good, ie that's putting the  
4 £10,000 in --

5 A. I think what I was saying is he's told Horizon that he's  
6 put £10,000 in but then immediately the -- so he does  
7 his cash declaration at branch trading, £10,000 short,  
8 he makes good cash 10,000, so it balances. The next day  
9 the £10,000 shortage reappears again, which would  
10 suggest he's not physically put the £10,000 into the  
11 till.

12 Q. That's not what you are saying there at all.

13 A. Isn't it?

14 Q. You are saying that the system is showing a £20,000 debt  
15 on the cheque line, he acknowledges some of that debt  
16 when he's made good at branch, by putting £10,000 in,  
17 and he's, therefore, falsified his branch trading  
18 statements, aren't you?

19 A. No, I don't think so. I mean, we're not talking about  
20 the cheque line anyway here. We're talking about the  
21 cash position. So what I'm saying is that the derived  
22 cash position was £20,000 that should be cash. He only  
23 physically had £10,000 in the till. He's then told --  
24 he's then increased his cash declaration to 20,000. The  
25 system is rolled forward in a balanced state but because

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1 A. I don't -- "guilty" doesn't sound a --

2 Q. It's not a nice word, is it?

3 A. No, no.

4 Q. But it's accurate.

5 A. No, I don't think it is.

6 Q. You assume that --

7 A. I believed that the loss was proper to the branch.  
8 I think guiltiness is not something that I was -- would  
9 be thinking.

10 Q. You assume that he's culpable for wrongdoing --

11 A. I believed he was --

12 Q. -- unless he prove otherwise?

13 A. -- culpable for the loss, yes, unless he can give me any  
14 indication he was not.

15 Q. Where he was saying that the problem is due to an error  
16 in Horizon, its programming, a bug or some such in the  
17 code or in the data, how was he to prove that?

18 A. I guess I can't answer that.

19 Q. We've heard evidence from many subpostmasters that once  
20 they were suspended they were locked out of their  
21 offices. You knew that, didn't you?

22 A. Probably. It wasn't --

23 Q. This subpostmaster was suspended. If he was locked out  
24 of his office, how would he prove it?

25 A. Yes, fair point.

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1 the £10,000 didn't physically go into the till, when he  
2 did his next cash declaration the £10,000 shortage was  
3 still there again.

4 Q. Moving on at the foot of the page, two paragraphs up,  
5 you say:

6 "If that does not satisfy him he would need to  
7 establish that his trial balance actually balances. If  
8 it does (and it will) he would need to demonstrate where  
9 balancing [£10,000] element of the loss is.

10 "These are all things for him to prove. If he can  
11 support any of his allegations we will investigate --  
12 and be extremely worried whilst doing so."

13 In the course of these paragraphs you say, I think  
14 four times, that it's down to the subpostmaster to  
15 prove; for the subpostmaster to establish; for the  
16 subpostmaster to demonstrate; for the subpostmaster to  
17 support what he's saying.

18 Was the assumption by you that, if there was no  
19 obvious answer or cause for a discrepancy, it was  
20 assumed to be the fault of the subpostmaster unless they  
21 proved otherwise?

22 A. I think that's probably a fair comment.

23 Q. And, therefore, you are applying an approach of assuming  
24 that the subpostmaster's guilty until he proves he's  
25 innocent?

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1 Q. What is the answer to it?

2 A. I don't know.

3 Q. Is this email a reflection of the fact that it was  
4 important for you to maintain the position that Horizon  
5 was infallible, was foolproof, and that if he could  
6 support any of his allegations that would unfortunately  
7 undermine that position?

8 A. I think it's a reflection of me being new to a role and  
9 not doing it very well at that point and, as I said, if  
10 I was doing it a couple of years later I would have  
11 approached it a lot better. So I think I was probably  
12 following the company line to some extent at that point.

13 Q. You say, at the foot of the page, in the last line:  
14 "If he can support any of his allegations we will  
15 investigating -- and be extremely worried whilst doing  
16 so."

17 Is that because it would undermine the  
18 infallibility of Horizon, the line that the Post Office  
19 took?

20 A. Yes, I think if cheques were -- phantom cheques were  
21 appearing on a branch's account, then I would be  
22 extremely worried and I've kind of agonised over that  
23 concept for quite a while and I still cannot understand  
24 how that would happen. But if it does, it does.

25 Q. Wouldn't it cause an extreme worry that a man suspended

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1 from his job, about to lose his livelihood, career and  
 2 marriage was, in fact, innocent of any wrongdoing?  
 3 **A.** Yes.  
 4 **Q.** Was the attitude of mind that we see displayed in this  
 5 email reflective of a culture in which you worked and at  
 6 this time?  
 7 **A.** Possibly.  
 8 **Q.** Put it another way: if others in your department had  
 9 been asked to respond to Mr Lusher's email, would they  
 10 have responded broadly as you did on the key issues or  
 11 are you the outlier that took a particularly hard line  
 12 on subpostmasters?  
 13 **A.** No, I think the former.  
 14 **Q.** The former?  
 15 **A.** Yes.  
 16 **Q.** Can I turn to a related email exchange concerning  
 17 Mr Ward, POL00002268. Just forgive me whilst I catch up  
 18 with my hard copy papers.  
 19 Can we turn to page 2, please. Just scroll down  
 20 just so we can see the signature block, please. This is  
 21 an email dated 1 February 2010 from Hayley Fowell,  
 22 external relations manager at the Royal Mail Group, and  
 23 it concerns Mr Ward, the man we have been looking at.  
 24 It's to David Smith, Michele Graves and Dave Hulbert:  
 25 "Hi all,

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1 "Andy [I think that's you now copied into this  
 2 chain], you also asked me for an update on Mr Ward  
 3 recently -- if you have any new info, can you please let  
 4 Hayley know."  
 5 Then at the top of the page, you reply:  
 6 "Hi Hayley, we're due to restart our former agent  
 7 debt recovery process. I just wanted to check the  
 8 recent communications to ensure there was nothing there  
 9 to suggest we should not do these. Let me know if we  
 10 should not pursue at this stage."  
 11 In this email chain, there's a reference to the  
 12 "stock line", the stock line which states that Horizon  
 13 is robust. Is that something that you were aware of?  
 14 **A.** Yes.  
 15 **Q.** Would you agree that a stock line is a standard  
 16 response, a hackneyed response --  
 17 **A.** Yes.  
 18 **Q.** -- to which no real thought or attention has been given?  
 19 **A.** No.  
 20 **Q.** Does that not reflect then your understanding of the use  
 21 of the phrase "stock line"?  
 22 **A.** I would say my understanding is that it's used by  
 23 everybody, but I don't think it undermines the integrity  
 24 behind that belief.  
 25 **Q.** You say you wanted to:

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1 "We've had a media inquiry from Retail Newsagent  
 2 magazine; they have been talking to a subpostmaster who  
 3 has said that his branch was closed in [September] 2008  
 4 because of financial irregularities which he claims are  
 5 the fault or Horizon.  
 6 "I am providing our stock line which states the  
 7 system is robust but in case we get more questions on  
 8 this please can you advise if you have any record of  
 9 an investigation for this individual and any relevant  
 10 details -- Graham Ward, Rivenhall Oak Stores & Post  
 11 Office in Witham."  
 12 Can we go back over the page to page 1, please --  
 13 the bottom half of the page, please. Michele Graves,  
 14 the Executive Correspondence Manager for the Executive  
 15 Correspondence Team, replies:  
 16 "I have been corresponding with Mr Ward for  
 17 a while. You may recall he is on the spreadsheet  
 18 I pulled together. I'll send over what I have. The  
 19 issue is basically the same -- Horizon is at fault --  
 20 and he has focused on some cheques despatched from his  
 21 branch that [I think that's] then showed up on his  
 22 cheque line. The termination went to appeal and the  
 23 decision to terminate was upheld. Mr Ward's MP is  
 24 Brooks Newmark who I believe has raised Parliamentary  
 25 questions re Horizon integrity.

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1 "... check recent communications don't suggest  
 2 that we shouldn't restart the debt recovery process."  
 3 Why would the recent communications affect the  
 4 restarting of the debt recovery process?  
 5 **A.** It depends what the communications have been and whether  
 6 the business approach had been changed.  
 7 **Q.** This was now some time on from your response in 2008  
 8 that there would be no further investigation by the Post  
 9 Office, unless Mr Ward could prove what he was saying,  
 10 and asserting your confidence in Fujitsu's security  
 11 procedures.  
 12 Were you concerned at all that Mr Ward was  
 13 continuing to protest his innocence and to seek answers  
 14 about why there had been unexplained entries in his  
 15 accounts?  
 16 **A.** I was conscious that he was obviously still protesting  
 17 his innocence, but I wasn't doing anything about it  
 18 because there was nothing I could do about it.  
 19 **Q.** Why was there nothing you could do about it?  
 20 **A.** Because there would be no access to Horizon information  
 21 at that point.  
 22 **Q.** Why?  
 23 **A.** You'd have to ask Fujitsu and our IT department that.  
 24 You can only -- you could only go back so far.  
 25 **Q.** How at that stage could Mr Ward establish his innocence?

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1 A. I can't say.  
 2 **MR BEER:** Yes, thank you very much, Mr Winn. Those are the  
 3 only questions I ask at the moment.  
 4 I wonder whether we might take a 15-minute break  
 5 and then the questions for the Core Participants can  
 6 commence at 3 pm?

7 **SIR WYN WILLIAMS:** Yes, that's fine.

8 **MR BEER:** Thank you very much, sir.

9 (2.47 pm)

(A short break)

11 (3.00 pm)

12 **MR BEER:** Sir, thank you. I think Mr Stein is going to ask  
 13 questions first.

**Questioned by MR STEIN**

15 **MR STEIN:** Good afternoon, Mr Winn, my name is Sam Stein.  
 16 I represent a large number of subpostmasters and  
 17 mistresses.

18 I am going to take you back, first of all, to the  
 19 mismatch document, which I hope I've got the correct  
 20 reference number to, which is POL00028838.

21 Can we go to page 3, please. Mr Winn, you were  
 22 taken to this document earlier on by Mr Beer who  
 23 highlighted with you the various solutions that were  
 24 discussed on this page. Frankie, can you highlight  
 25 Solution One, please, in yellow -- thank you.

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1 the branch.

2 Was this the first time that you'd learnt that  
 3 Fujitsu could alter branch accounts?

4 A. I don't know.

5 Q. Well, it's a fairly significant issue to have come up in  
 6 this particular meeting, bearing in mind you are dealing  
 7 with Rivenhall; do you agree?

8 A. Yes.

9 Q. As an example did you say to yourself that we'd better  
 10 do something about Rivenhall because this appears to be  
 11 show that Mr Ward there may be right, that data there  
 12 could be interfered with without his knowledge?

13 A. I think there's a difference between entering data to  
 14 resolve a problem rather than what implication was for  
 15 Mr Ward of somebody introducing cheques for no apparent  
 16 reason.

17 Q. I see. Did you, in any way, investigate the issue that  
 18 comes from this when you thought about Mr Ward's  
 19 situation?

20 A. No.

21 Q. You understand the link, don't you?

22 A. I do now, yes. I probably wouldn't have at that point.

23 Q. I will take you to another document, please, which is  
 24 POL00055410. Thank you. Further down the page please,  
 25 Frankie, and this is a document you were shown just

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1 Now, let's just remind ourselves of what Solution  
 2 One referred to, Mr Winn. Solution one was:  
 3 "Alter the Horizon Branch figure at the counter to  
 4 show the discrepancy. Fujitsu would have to manually  
 5 write an entry value to the local branch account."

6 Then it says:

7 "IMPACT -- when the branch comes to complete next  
 8 Trading Period they would have a discrepancy, which they  
 9 would have to bring to account."

10 Now under "RISK":

11 "This has significant data integrity concerns and  
 12 could lead to questions of 'tampering' with the branch  
 13 system and could generate questions around how the  
 14 discrepancy was caused. This solution could have moral  
 15 implications of Post Office changing branch data without  
 16 informing the branch."

17 Now, you've just been asked before the short  
 18 break, a few minutes ago, a number of questions about  
 19 Rivenhall Post Office and about questions that related  
 20 to interference with the data that was being seen by the  
 21 postmaster there, Mr Ward, yes? At this particular  
 22 meeting you are being told it is possible to tamper with  
 23 branch office accounts and, indeed, the conclusion is,  
 24 as regards that, that that could have moral implications  
 25 of Post Office changing branch data without informing

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1 after the luncheon adjournment today, the one that is  
 2 dated 8 October 2010 and Mr Beer took you to this and  
 3 dealt with particular points.

4 Can I take you to the second paragraph. So this  
 5 is about the mismatch meeting notes:

6 "The above includes Fujitsu's initial analysis and  
 7 proposed solution/s."

8 Can we scroll up to the above bit please, Frankie.

9 So the attachments in relation to this email are  
 10 the "ReceiptsPayments notes[version]5", which we believe  
 11 are the mismatch notes that you have been asked a number  
 12 of questions about and then, after the colon,  
 13 highlighted there, "Lost Discrepancies", that's  
 14 a document drafted by Mr Jenkins, okay.

15 Let's go back to what we're seeing in the middle  
 16 of this email. You said in your evidence today to the  
 17 Chair of this Inquiry that you thought that Fujitsu had  
 18 proposed the three solutions in the mismatch meeting  
 19 notes?

20 A. Yes.

21 Q. Now, this particular email from Alan Simpson who  
 22 attended that meeting is saying the above -- the above  
 23 attachments -- includes Fujitsu's initial analysis and  
 24 proposed solutions. Does that help you in your  
 25 recollection that it was Fujitsu that had put forward

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1 the solutions that you have been taken to today?  
 2 **A.** It supports what we were saying, yes.  
 3 **Q.** Now, as regards those solutions, did anybody consider at  
 4 the meetings in relation to the mismatch bug and  
 5 software error, did anybody consider the legal  
 6 implications of keeping information back from  
 7 subpostmasters being prosecuted?  
 8 **A.** I can't remember that being discussed, no.  
 9 **Q.** As an example, did anybody suggest that might be  
 10 a criminal offence of keeping that information back?  
 11 **A.** No.  
 12 **Q.** No?  
 13 **A.** No.  
 14 **Q.** Lastly in relation to this, the email is referring to:  
 15 "The above includes Fujitsu's initial analysis and  
 16 proposed solution/s, whilst the other documents the  
 17 outputs from various meetings held this week."  
 18 Let's take that apart into two bits. So it looks  
 19 as though, regarding the mismatch discussions, that  
 20 there were various meetings. Is that your recollection?  
 21 **A.** I don't remember attending various meetings -- it may  
 22 have been phone conferences rather than meetings.  
 23 **Q.** Would it be normal for these meetings to have notes  
 24 taken?  
 25 **A.** Well, somebody would have been responsible, yes,  
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1 there has been no re-occurrence to the phantom  
 2 transactions but there still may be problems."  
 3 Let's unpick what this all means. Romec the Royal  
 4 Mail or Post Office engineers; is that correct?  
 5 **A.** Yes.  
 6 **Q.** This is referring to phantom transactions coming up on  
 7 the screen; do you agree?  
 8 **A.** Yes.  
 9 **Q.** Phantom transactions in relation to the date of this  
 10 particular entry seems to have gone back to quite early  
 11 days of Legacy Horizon; do you agree?  
 12 **A.** Yes.  
 13 **Q.** Were you aware of phantom transactions as being  
 14 a problem?  
 15 **A.** No.  
 16 **Q.** Do you remember speaking to Colleen Ingham, we think, in  
 17 about 2004 about phantom or ghost transactions?  
 18 **A.** No, sorry, no.  
 19 **Q.** So help us a little bit further in relation to this.  
 20 Bearing in mind that we're talking about phantom or  
 21 ghost transactions appearing on a subpostmaster's  
 22 screen, was this some information that would have been  
 23 useful for your consideration in handling postmaster  
 24 issues?  
 25 **A.** Yes, I think it would be fair to say that when I left  
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1 I believe so, yes.  
 2 **Q.** Presumably, the end result of such meetings would be  
 3 notes and minutes?  
 4 **A.** Yes.  
 5 **Q.** I am going to take you, please, to then a different  
 6 document, which is POL00029224, page 5.  
 7 If you can scroll down the page. This document,  
 8 I am afraid, is difficult. We might be able to improve  
 9 it by expanding it slightly, Frankie. Go further down  
 10 the page, please, and again a little bit further down  
 11 again. You will see at the bottom of that page, if we  
 12 can highlight from "Information: Ki Barnes has called  
 13 in", can we zero on that and expand and highlight.  
 14 Now, this particular document, as you can see,  
 15 it's 2001, it looks like, and the reference is to  
 16 phantom transactions, okay?  
 17 **A.** Mm-hm.  
 18 **Q.** So I'll read what we have here. This is a record of  
 19 this matter being dealt with as a PEAK, which is part of  
 20 the system being used by Fujitsu:  
 21 "I am unsure as to what to do with this call now.  
 22 Romec have been to site and state that they have  
 23 actually seen the phantom transactions, so it is not  
 24 just the PM's word now. They have fitted suppressors to  
 25 the kit but the PM is still having problems. As yet  
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1 the business I didn't accept the concept of phantom  
 2 transactions and that was in 2016.  
 3 **Q.** Right. Now, in your evidence earlier on, when you were  
 4 discussing matters with Mr Beer, you appeared to be  
 5 familiar with the concept of phantom transactions being  
 6 raised. You weren't saying to him "I don't know what  
 7 you're talking about, Mr Beer". So when did you start  
 8 to become aware of the topic of phantom transactions?  
 9 **A.** I would have said it would be when Second Sight started  
 10 their investigation but that kind of feels a bit too  
 11 late, to be honest. So I probably heard the term before  
 12 but I struggled with the concept of it.  
 13 **Q.** Ms Ingham, who ran the Cockfield Post Office in County  
 14 Durham recalls you speaking to her about ghost  
 15 transactions in around 2004?  
 16 **A.** 2004, okay.  
 17 **Q.** Thinking back, do you think that's possible?  
 18 **A.** I'm trying to think what role I'd be in in 2004.  
 19 I guess that was in problem management, was it?  
 20 **Q.** Very early days of that, we think.  
 21 **A.** No, I don't know if I was in problem management then or  
 22 in the Transaction Improvement Team, Network Improvement  
 23 Team.  
 24 **SIR WYN WILLIAMS:** If it helps, I think early on in your  
 25 evidence you were referred to paragraph 1 of your  
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1 witness statement where you suggested that you'd gone to  
2 the problem management team in 2005 but, in fact, there  
3 was a document which showed that you were there in 2003.

4 **A.** Okay.

5 **MR STEIN:** So it seems likely this had been once you moved  
6 into the problem management role. Do you think then,  
7 looking back and looking at the collection of  
8 information you now have, that there was an awareness  
9 within the Post Office of phantom transactions?

10 A client of mine recalls speaking to you about  
11 ghost transactions, that at that time in 2004 you  
12 probably did know something about the topic of phantom  
13 transactions.

14 **A.** Obviously, it had been raised. I wouldn't argue with  
15 your client's recollections. I don't recall it myself.

16 **Q.** Now I will ask you about a different document, please,  
17 POL00029719.

18 Now, this is an email, Mr Winn, from Rod Ismay.  
19 You can see the date of this. This is 3 July 2013, sent  
20 to you and the subject matter is "Branches affected by  
21 Receipts Payments and Discrepancies issue", okay. So  
22 it's a follow-on from such matters. If you go further  
23 down, you can see that it says:

24 "1 of 2 emails re the 2 branches on the other  
25 list.

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1 "The branch was included in investigations into  
2 receipts payments problems at the beginning of October,  
3 and was found to be a different problem from the others  
4 also under investigation at the time, so was not  
5 included in the later spreadsheets sent to POL."

6 Mr Winn, you have been asked various questions  
7 about what happened in the mismatch payments issues and  
8 about the different solutions that were proposed to the  
9 mismatch difficulties and problems. You've been asked  
10 questions about whether the postmasters should have been  
11 informed that "Here's a problem, here's a bug", that can  
12 affect their accounts.

13 What happened regarding this? Did you tell  
14 postmaster branches that "There's another problem,  
15 another bug, that can affect your figures?"

16 **A.** I cannot remember what the outcome from these was.

17 **Q.** Do you recall whether there were similar discussions to  
18 perhaps keep this buried and not tip off the  
19 subpostmasters?

20 **A.** No, I'm sorry. Do we know what the name of the branches  
21 are, see if that rings any bells with me.

22 **Q.** I'm not sure I do. If I have the information I will  
23 come back to you.

24 **A.** Okay.

25 **Q.** Next document, please, POL00004694, pages 1 and 2. I'm

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1 "Thanks, Rod."

2 So you are being referred then to the further  
3 information.

4 If we just go down, we'll see therefore the  
5 connected email, which says from Pete Newsome to Rod  
6 Ismay:

7 "Rod

8 "Looks like this branch had a different problem so  
9 was removed from the original list. The email below  
10 explains what happened and how we advised Post Office on  
11 the situation. Have an answer on second branch as well,  
12 will send that through shortly."

13 Again, if we can go further down the page then to  
14 the second email, headed from Mark Wright. Then that  
15 one from Mark Wright to Pete Newsome, Gareth Jenkins,  
16 involving also Steve Parker, Steve Bansal and John  
17 Simpkins:

18 "We've unearthed the following email ..."

19 Then there's some figures given "122946", and then  
20 go to the second page, please, Frankie. It's probably  
21 easiest to look at the second paragraph:

22 "Branch 122946 rolled from TP4 to TP5 on  
23 11 August. They accepted a gain of £34,330.88 which was  
24 settled centrally. The BTS shows a trading position of  
25 £22,021.65.

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1 grateful.

2 So this email dated 10 May 2010 from Nigel Allen  
3 to you, and you will see the reference to "Barkham" and  
4 then the number appropriate for Barkham "Outstanding  
5 losses". This is from Nigel Allen, who was he?

6 **A.** I believe he was a contract manager.

7 **Q.** Right. To you:

8 "Andy

9 "What is this [£25,000] of returned cash on 5 Jan?"

10 "Has this been properly recorded on the Horizon  
11 System?"

12 "Was it received back at the Cash Centre?"

13 If we go down to the second page, please, I think  
14 a little bit further down, please, thank you. Now, this  
15 particular branch concerns Pam Stubbs. Does that name  
16 ring a bell?

17 **A.** It doesn't, I'm afraid.

18 **Q.** Ms Stubbs was blamed for a shortfall of £28,000. She  
19 lost her business and was pursued by the Post Office for  
20 settlement of eventually £36,000. She had been told by  
21 Fujitsu engineers that the movement of terminals, the  
22 putting in and taking out of terminals, without proper  
23 safeguards could cause faults. Were you aware of that?

24 **A.** That doesn't ring any bells. No.

25 **Q.** If we can go further down to the bottom of this

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1 particular email and then the starting point for the  
2 reference that I'm about to make is "If there is  
3 anything specific to investigate". Thank you.

4 So the email is saying:

5 "We are aware of the problems at the branch. The  
6 letter suggests she has done all the checks we (and  
7 NBSC) would have suggested. There is not a lot of value  
8 I can add as there is nothing recorded that would  
9 account for the different losses.

10 "There are no transaction corrections that account  
11 for the losses or that should have compensated for them.  
12 She has already checked her transactional records and  
13 can see nothing so it is unlikely that customers are  
14 suddenly going to start alerting us to strange deposits  
15 into their accounts.

16 "What may or may not be interesting is a [£1,000  
17 transaction correction] issued recently for a cash  
18 shortage in a rem to the cash centre. One would have  
19 thought that with the issues involved that a mistake  
20 like this would not have been made that realising. It  
21 is possible they did realise once the rem had gone but  
22 smacks of carelessness at least."

23 Now, that level of judgement in relation to  
24 an investigation as regards this branch, which is  
25 suggesting that it's careless, is that in the same line

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1 investigation.

2 **Q.** Then, lastly for my part, and I take you to another  
3 document POL00090726. Page 15 of this document first.  
4 Go a little bit further down the page so we can see the  
5 letter at the bottom, please.

6 So we can see, Mr Winn, there's a letter from you  
7 to Mr Afzal?

8 **A.** Yes.

9 **Q.** So we're going back to the start of this letter and the  
10 date of it, please, if we just show that: 11 October  
11 2011.

12 "Dear Mr Afzal

13 "Re Branch Discrepancy

14 "I'm sorry to learn that your branch has  
15 experienced connectivity problems in September. I'm  
16 afraid I don't think I am going to be able to help you."

17 You go on to say this:

18 "Some transactions will never be recoverable,  
19 eg stamp sales whilst others, eg card account  
20 withdrawals will be recoverable dependent upon the point  
21 at which the communications broke down. I appreciate it  
22 is difficult to know where you are if communications are  
23 lost."

24 So Mr Winn, can we establish that in at least  
25 11 October 2011 your knowledge about connectivity

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1 as your views earlier, that this is a general view of  
2 the Post Office, that it's likely to be down to  
3 subpostmaster fault where there are issues?

4 **A.** I don't think it particularly states that.

5 **Q.** Then it goes on to say this:

6 "If there is anything specific to investigate I am  
7 happy to. It may be worth getting something in writing  
8 from Fujitsu to confirm there is nothing that could have  
9 failed to have polled/software anomalies that will come  
10 back to bite us."

11 Signed "Andy".

12 Is that the right approach, Mr Winn?

13 **A.** It feels sensible.

14 **Q.** Does it?

15 **A.** To me, yes.

16 **Q.** What about a deeper investigation as to polling issues?

17 **A.** Well, that would be Fujitsu who would do that.

18 **Q.** Given at this stage, this is after the other issues that  
19 you had been made aware of, after the mismatch bug, such  
20 discussions in relation to that, you didn't think at  
21 this stage that the best thing to do would be to, in  
22 fact, properly investigate this?

23 **A.** I thought it was -- obviously thought it was worth going  
24 back to Fujitsu to get a report on the polling issues  
25 but apart from that I couldn't see any other route for

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1 problems was that it could lose data?

2 **A.** Yes.

3 **Q.** Keep reading:

4 "However there is a general principle that if  
5 a transaction receipt has not been produced by Horizon,  
6 the transaction has not completed and cash should not  
7 change hands until you are certain of the transaction  
8 status. Clearly if recovery takes a period of time, the  
9 customer may have left. If the transaction is seen to  
10 be recoverable, the option not to proceed with recovery  
11 should be chosen."

12 Then you go on to say this:

13 "Unfortunately I am not able to offer any relief  
14 to branches who may not have followed recovery  
15 procedures in full."

16 So this is clearly a discussion about connectivity  
17 issues that may have caused a branch transaction  
18 difficulty; do you agree?

19 **A.** Yes.

20 **Q.** Why here are you saying that you are not able to help:

21 "I'm sorry to learn your branch has experienced  
22 connectivity problems in September. I'm afraid I don't  
23 think I'm going to be able to help you."

24 Why is that the attitude of the Post Office?

25 **A.** I think there was a recovery process to follow. Quite

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1 why the -- if it wasn't followed properly, it could  
2 cause issues. That must have been a business decision  
3 that we're unable to resolve. I can't really remember  
4 it well enough, I'm afraid.

5 **Q.** Let's be as generous as we can to the Post Office at  
6 this juncture. We've got connectivity issues being  
7 caused by the system that the Post Office branches have  
8 to use, okay. That's at least a large part of this  
9 problem. Why isn't the Post Office saying "Sorry to  
10 hear about that problem, obviously this at the very  
11 least is partly our fault, we will help come sort it out  
12 and repay your losses". Why isn't that happening?

13 **A.** That sounds reasonable.

14 **Q.** It does. Why wasn't it happening, Mr Winn?

15 **A.** I can't say.

16 **Q.** Can we go then to the page 14, please. Society  
17 14 October 2011 to Mr Afzal, Ferry Road Post Office.

18 "Dear Mr Afzal.

19 "Re Branch Discrepancy

20 "I'm sorry doubt I don't think I can assist you  
21 any further. The process for disputing losses is via  
22 the helpline. As far as I can see there is no evidence  
23 of Horizon failure been presented which would generate  
24 an investigation."

25 Then:

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1 manage any losses of connectivity. This does not  
2 represent Horizon failure and the business has been very  
3 clear that it will not compensate losses due to  
4 connectivity break down."

5 Let's take that apart. What are the processes  
6 that were in place for branches to manage any losses of  
7 connectivity this way?

8 **A.** I can't remember but they would be -- on the Horizon  
9 Help you would be able to put -- but once you got  
10 connectivity back, you could refer to them if you hadn't  
11 already got the knowledge of what to do.

12 **Q.** Those processes clearly don't involve compensation, do  
13 they?

14 **A.** No.

15 **Q.** Because you clear that one up:

16 "This does not represent Horizon failure and the  
17 business has been very clear that it will not compensate  
18 losses due to connectivity breakdown."

19 Let's just understand what you mean by this. Why  
20 would the Post Office not compensate subpostmasters for  
21 issues caused by connection problems of the Horizon  
22 equipment?

23 **A.** I cannot recall the process and how it was managed. I'm  
24 sorry.

25 **Q.** As an example, was this directive from the Post Office?

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1 "There are processes in place for branches to  
2 manage any losses of connectivity. This does not  
3 represent Horizon failure and the business has been very  
4 clear that it will not compensate losses [due] to  
5 connectivity breakdown.

6 "As such I cannot suggest who in Post Office  
7 Limited might take a different view and be able to help  
8 you."

9 Then if we scroll down to the bottom, we will see  
10 it's signing my you:

11 "Yours sincerely

12 "Andrew Winn."

13 So let's have a look at what you said then to  
14 Mr Afzal:

15 "I'm sorry but I don't think I can assist you any  
16 further. The process for disputing losses is via the  
17 helpline."

18 Which helpline did you mean?

19 **A.** NBSC.

20 **Q.** NBSC. So via the Post Office helpline, that's the only  
21 way that Mr Afzal should be able to dispute these  
22 matters?

23 **A.** That was the designated route for IT problems, yes.

24 **Q.** Then it goes on to say -- or you go on to say:

25 "There are processes in place for branches to

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1 **A.** From the wording in my letter I've obviously been up and  
2 checked the business position at the time and reiterated  
3 what I've been told.

4 **Q.** Is this you -- you were talking earlier about you  
5 settling into your job and getting better at it after  
6 a few years. Is this you having settled into the job  
7 and having got better at it after a few years, Mr Winn?

8 **A.** That was the business rules which I'm following.

9 **Q.** Which you are enforcing.

10 **A.** Yes, I'm sorry the business rules weren't correct but --

11 **Q.** Why do connection issues not represent Horizon failure?

12 **A.** I would regard loss of connectivity as being like losing  
13 Wifi connection, the equivalent, as I understand  
14 nowadays. So I wouldn't understand it as Horizon being  
15 at fault. I'd understand it as the first links which  
16 you know, a lot of rural branches did suffer from  
17 connectivity issues. I mean, my interpretation was that  
18 that was not Horizon at fault but it might --

19 **Q.** So it is just hard luck on subpostmasters; is that  
20 right, Mr Winn?

21 **A.** Well, there's a process -- there was a process to follow  
22 to recover the transactions.

23 **Q.** But to make sure that you are finished with the problem,  
24 you finish off by saying:

25 "As such I cannot suggest who in Post Office might

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1 take a different view and be able to help you."  
 2 So you're saying "That's it?"  
 3 **A.** That would imply that I checked with the people who  
 4 I think might have a different view and already got  
 5 their opinion.

6 **Q.** Excuse me one moment.

7 Thank you, Mr Winn.

8 Thank you, sir.

9 **SIR WYN WILLIAMS:** Thank you, Mr Stein.

10 Anyone else?

11 **Questioned by MS PAGE**

12 **MS PAGE:** Yes, please, sir.

13 If I can take us to a document which helps  
 14 a little bit on the subject of phantom transactions.  
 15 It's POL00093133. This is an email chain, which you're  
 16 not actually copied in on but which makes a reference  
 17 to you, which may assist. Could we start at the bottom,  
 18 please, the last page in this so that we read up  
 19 chronologically.

20 Do you know either of these names Bethany or Sally  
 21 Buchanan? They seem to be from Customer Service, if  
 22 that means anything?

23 **A.** I can't remember --

24 **Q.** What we've got here is Bethany saying:

25 "Are you able to help me with this office or let  
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1 and one or more customers have been given money they  
 2 were not entitled to and have just kept it."

3 So that is the start and if we go up then to  
 4 response, there's a blank page so we need to go a little  
 5 buyer thank you, and we can see that this is 27 June  
 6 2003 from Terry Rudd in customer relations:

7 "Thanks for raising this matter with us. An  
 8 investigation has taken place with Julie Welsh, our  
 9 contact at Fujitsu, and she accepts that the PM did call  
 10 the Helpdesk to state that transactions were appearing  
 11 on the sales stack, but kit was swapped out and the  
 12 problem did not reoccur. As no further problems were  
 13 reported, she thought that was the end of the matter.

14 "As the losses occurred back in January,  
 15 information relating to this branch has now been  
 16 archived but your concerns have today been raise with  
 17 the Problem Management Team who have more experience in  
 18 dealing with phantom transactions. I am unsure which  
 19 member of the team will be assigned to the case, but if  
 20 you have any further questions, the Line Manager for the  
 21 team is Andy Winn."

22 Then it sets out a reference code for queries  
 23 regarding this issue and signs off:

24 "... Customer Relations [can't help] but I am sure  
 25 Andy and his team will do their best to resolve this."  
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1 me know who can help.

2 "The office had a major software problem back in  
 3 week 41 (January 2003). After numerous phone calls to  
 4 NBSC and engineer visits to change cables, monitor  
 5 et cetera, a software problem was identified and the  
 6 processor changed. Apparently the screen would take on  
 7 a mind of its own, jump screens, add items to the sales  
 8 stack, et cetera. The office balanced £422.74 short  
 9 that week, which is very unusual for the office -- they  
 10 are normally within £20 each week.

11 "The subpostmistress has waited for an error  
 12 notice to come back, nothing has been received yet and  
 13 I've checked with Chesterfield several times -- nothing  
 14 so far. I have also checked the paperwork in the office  
 15 for week 41, along with week 40 and week 42 and I can't  
 16 find anything. Is there anything you can do at Dearne  
 17 Valley ..."

18 Is that the place where your premises were when  
 19 you were in problem management?

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

21 **Q.** "... to have that week's work checked on the system to  
 22 see if this has been caused by a systems fault. The  
 23 only other thing I can think of is that if the system  
 24 was going daft and putting things onto the sales stack,  
 25 this wasn't picked up every time by the person serving  
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1 So what we have there is an indication that  
 2 phantom transactions were something sufficiently well  
 3 known in your team that this was being specifically  
 4 referred to you and your team?

5 **A.** Yes.

6 **Q.** Yes?

7 **A.** Yes.

8 **Q.** Which ties, doesn't it, with what Mr Stein told us, that  
 9 his Core Participant had spoken to somebody about  
 10 phantom transactions. So clearly this was a known  
 11 problem right the way back to this early date.

12 What would you have done about a query like this?

13 **A.** Would have allocated it to a team member to raise it  
 14 with Fujitsu.

15 **Q.** What sort of response might you have got from Fujitsu?

16 **A.** A review of their -- I don't really know what they would  
 17 have done. I would have hoped they'd have looked at  
 18 the -- identified the times and looked to see if there's  
 19 any problems arising from there and reported them back  
 20 to us.

21 **Q.** So following that report, let's say they come back to  
 22 you and say "Yes, we've identified there are phantom  
 23 transactions in this particular branch or in this  
 24 particular group of branches, potentially", what would  
 25 your team have done about that?  
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- 1 A. Well, we'd have escalated it probably to our IT team and  
2 said what we're going to do about it, how we're going to  
3 resolve it.
- 4 Q. What would you have done in terms of the branches?
- 5 A. Resolved any financial accounting discrepancies.
- 6 Q. How did you go about that?
- 7 A. That would have been done through a P&BA or whatever it  
8 was called at that time.
- 9 Q. So there would have been quite a lot of communication,  
10 wouldn't there, between your team and people at Fujitsu,  
11 people in P&BA --
- 12 A. I would have thought so, yes.
- 13 Q. -- people in the groups, the POL or perhaps the group,  
14 at that stage, IT directorate -- was it one or the  
15 other, do you know?
- 16 A. I wouldn't know.
- 17 Q. Did your team escalate the issue of phantom  
18 transactions?
- 19 A. I would have thought so from -- I presume that that was  
20 raised to our team. I can't remember it.
- 21 Q. Do you have no memory of escalating this issue of  
22 phantom transactions when you were the team leader at  
23 this time?
- 24 A. No.
- 25 Q. Wouldn't it have been a matter of concern to you?

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- 1 problem management? You don't know who it was above  
2 your team leader or your boss or whoever that may have  
3 been?
- 4 A. No, I can't remember.
- 5 Q. You gave us the name of one of your bosses earlier,  
6 didn't you. Do you remember what she was the boss of?
- 7 A. Marie Cochate. Yes, that was when I was in Chesterfield  
8 at the process improvement team.
- 9 Q. I think you gave us a name for somebody at --
- 10 A. Actually, I think she was my boss in problem management  
11 as well, initially.
- 12 Q. So that was something in accounting, was it?
- 13 A. I think she moved as well. I think she moved from the  
14 accounting -- from the process improvement team into the  
15 same kind of team areas as I was in within problem  
16 management, if I remember correctly.
- 17 Q. Have you listened to the evidence from witnesses over  
18 the last week or so?
- 19 A. No.
- 20 Q. Because, collectively, they've given evidence that  
21 problem management really was the way that Post Office  
22 monitored the performance of Horizon and indeed the  
23 performance of Fujitsu in running and maintaining the  
24 performance of Horizon. Is that how you understood the  
25 role?

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- 1 A. Yes.
- 2 Q. Wouldn't it have been a matter of great concern to the  
3 business generally?
- 4 A. I don't know how easily it was -- what the Fujitsu  
5 findings were. I can't comment.
- 6 Q. If Fujitsu had come back and said "No such thing,  
7 there's no phantom transactions, it doesn't exist",  
8 would you have left it there?
- 9 A. I don't know where else I could have gone; so, yes,  
10 I think I would have.
- 11 Q. So never mind that your team evidently has, according to  
12 this email, more experience in dealing with phantom  
13 transactions, never mind that this isn't just a one-off,  
14 this is clearly something that's happened on a few  
15 occasions, you would have just taken Fujitsu's word?
- 16 A. I wouldn't have known where else to go.
- 17 Q. You wouldn't have taken it to anyone in IT at POL?
- 18 A. If it was -- yes, quite possibly. I would have imagined  
19 that the enquiry would have gone to Fujitsu and our IT  
20 teams.
- 21 Q. When you were at problem management, what was the  
22 directorate that your team sat in?
- 23 A. I would imagine the IT directorate. I can't actually  
24 remember.
- 25 Q. So you don't know who the director was in charge of

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- 1 A. No, not really.
- 2 Q. Well, what did you understand it to be then?
- 3 A. To be resolving problems, making sure the appropriate  
4 people were resolving problems. I don't think there was  
5 a -- particularly a reporting schedule. I don't  
6 remember that coming out of problem management when  
7 I was there.
- 8 Q. Was this the business as usual way to resolve bugs,  
9 errors and defects that arose in Horizon?
- 10 A. It was the way it should be recorded, yes.
- 11 Q. We know that by 2010 -- and I'm only going forward just  
12 to kind of come back, if you like -- by 2010, it was  
13 people in problem management that were the interface  
14 with Fujitsu over the receipts and payments mismatch  
15 bug, weren't they?
- 16 A. Yes.
- 17 Q. So the role was to be the interface on bugs and defects,  
18 and so forth, yes?
- 19 A. Yes.
- 20 Q. So it was a crucial IT role, wasn't it?
- 21 A. Yes.
- 22 Q. What interested you in that role when you applied to  
23 manage that team?
- 24 A. To be brutally honest, a promotion.
- 25 Q. What grade were you as a manager of that team of 12?

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- 1 A. CM1.  
 2 Q. TM1?  
 3 A. CM1.  
 4 Q. Where did that place you in the grades at the time?  
 5 A. That was the highest grade of middle manager before you  
 6 became a senior manager and from there -- so there's  
 7 different grades of senior manager and then directorate  
 8 level.  
 9 Q. How busy was your team of 12?  
 10 A. I would say the team were not desperately busy and I was  
 11 very busy.  
 12 Q. Right. Perhaps you can pull that apart for us. Why  
 13 were you busy and they weren't?  
 14 A. There were plenty of problems coming in. The problem  
 15 with, in my opinion, the problem management setup was  
 16 that if, effectively, a member of the product team,  
 17 which is nothing to do with IT, but a guy from the  
 18 product team who I knew very well said to me "You know,  
 19 we're told to report any problems into your team", you  
 20 make a note of it, say "Thanks very much, let us know  
 21 when you've resolved it" which -- so the team, bear in  
 22 mind I've got 12 people, seemed really to be employed  
 23 just to record something and wait for it to be told it  
 24 was cleared.

So when you went across the team "How are you

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- 1 A. A routine business as usual review of the departments,  
 2 as a whole. It wasn't my decision but there was kind of  
 3 a lot of change and it was decided to merge the two  
 4 teams together. They were quite similar in the  
 5 understanding, et cetera, et cetera. So I could  
 6 understand why it was done.  
 7 Q. Was there any strategic thinking at all about the  
 8 business as usual management of problems, defects, bugs  
 9 in Horizon?  
 10 A. Not that I was made aware of, no.  
 11 Q. Just lastly on this topic, what we have here the one  
 12 remaining, as far as we can tell document, from this  
 13 period of time when you were team leader of this crucial  
 14 team that had to interface on bugs, errors and defects  
 15 is one email from a different team, customer relations.  
 16 We have no emails from problem management itself, no  
 17 records at all from your time at problem management and  
 18 nothing at all about the problem of phantom or ghost  
 19 transactions, which apparently your team knew about.  
 20 Can you give us any understanding or explanation  
 21 for why there's so little information about your team at  
 22 that time?  
 23 A. No, I'm surprised there was -- as far as I'm aware  
 24 everything that we did was logged, so I'm quite  
 25 astonished at you saying that.

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- 1 doing on this one?" It was always "I'm waiting for",  
 2 "I'm waiting for", "I'm waiting for", and it was kind of  
 3 "Oh, can you chase them", et cetera, et cetera.  
 4 It didn't seem to -- I was quite uncomfortable  
 5 with that. I kind of expected it to be much more  
 6 proactive. I'd say to the teams, you know, "We need  
 7 an article to resolve a product issue".  
 8 "Well, they haven't got time to do it".  
 9 "Well, have a go at doing it yourself, submit it  
 10 to them and they'll probably be that horrified at what  
 11 you are doing, they'll do it themselves", and I was  
 12 trying to work on that basis of being more proactive.  
 13 On the IT side we wouldn't be able to do because we  
 14 wouldn't have had the knowledge obviously, but I found  
 15 it a difficult role.  
 16 Q. Yes, and one that you have already admitted you weren't  
 17 really qualified for.  
 18 A. Correct.  
 19 Q. Given that it was a role that was crucial for the  
 20 handling of the defects, bugs, errors and that that's  
 21 central to the work of this Inquiry, why didn't you say  
 22 anything about it in your witness statement?  
 23 A. I did make reference to it, didn't I?  
 24 Q. Why did the team get taken over by Risk, as you  
 25 described to us earlier?

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- 1 Q. Can we perhaps turn then a little ahead to POL00045457.  
 2 Now, this is a document which seeks to define the  
 3 process of settling centrally and it says at the bottom  
 4 that it's been a contribution from you. So it looks  
 5 perhaps as if it might be something that's to go into  
 6 a manual or something. Does that look familiar?  
 7 A. Yes, yes.  
 8 Q. If we just go back up again, it looks to be -- it's  
 9 expressed explicitly as a clarification?  
 10 A. Yes.  
 11 Q. It says:  
 12 "A recent audit has highlighted that many branches  
 13 are unclear on how to deal with losses and gains,  
 14 particularly around 'Settling Centrally'.  
 15 Do you think that audit might have been what you  
 16 did before you did those slides in January 2009?  
 17 A. I wouldn't have done the audit, I don't think. I think  
 18 that would have been feedback from network auditors.  
 19 I was out in branches.  
 20 Q. The reason I ask is because one of the slides that you  
 21 had created in January '09 sort of set the task of  
 22 defining the process of settling centrally and this  
 23 document appears to do that?  
 24 A. Yes.  
 25 Q. So do you think this document comes then from that

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1 process in January --

2 **A.** Quite possibly, without knowing the date of the

3 document.

4 **Q.** The document doesn't appear to bear a date and --

5 **A.** It sounds sensible.

6 **Q.** All right. Well let's assume then that it's part of

7 that January 2009 reappraisal, shall we say. When we

8 asked our client subpostmasters who had experience of

9 running post offices before January 2009, when we asked

10 them to have a look at this, none of them recognised

11 this process at all and, indeed, Janet Skinner said that

12 she was not aware that there was any dispute resolution

13 process whatsoever. Is it right that, prior to

14 January 2009, there really wasn't a recognised dispute

15 process at all?

16 **A.** Well, prior to me starting in the role, then that would

17 be correct, yes.

18 **Q.** So do you know why that role came up?

19 **A.** I think when I -- I should say, we had a reorganisation

20 in P&BA and the different teams were created and I went

21 into the debt team and my boss Alison said, "Look, we've

22 got people trying to contact teams and they're not

23 responding to, and we need a central point, we think it

24 should be you, have a look at it", and so the role kind

25 of evolved from there.

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1 another one, I'd just like to ask you a little bit about

2 Mr Lee Castleton. Is that a name that rings any bells

3 for you?

4 **A.** Yes.

5 **Q.** Did you know about his case at the time?

6 **A.** I think his case was -- I think his case was very

7 topical when I first joined the team.

8 **Q.** Right.

9 **A.** So it would be very much in my early days. I don't

10 think I was involved in any of the decisions around

11 suspension or anything.

12 **Q.** But it was known about, was it, in your team, quite well

13 known?

14 **A.** Yes.

15 **Q.** All right. So you'll have been aware then, won't you,

16 that in -- you won't necessarily remember the date but

17 it was in early 2007 that the judge awarded Post Office

18 damages of approximately £26,000 but costs of £321,000

19 which you might imagine bankrupted Mr Castleton. He

20 lost everything he'd invested in his branch, he lost his

21 living, his family were treated like thieves and they

22 endured years of hardship.

23 What we now know from documents in this Inquiry,

24 which haven't yet been sort of picked over but which

25 I can quote to you briefly from -- I don't know if we

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1 **Q.** You told us earlier that you didn't have to apply or

2 interview for this job. Was it a job that was, in

3 effect, one that you sort of created yourself once in

4 it?

5 **A.** Yes. Yes, I think when I first got there Alison and Rod

6 Ismay's view, they had some ideas about the role but,

7 effectively, it was me who kind of developed it to what

8 it was.

9 **Q.** At this stage, were you still a sort of top middle

10 management or had you entered the realms of senior

11 management by this stage?

12 **A.** No, still the same grade.

13 **Q.** Why do you think you were qualified to adjudicate on

14 disputes?

15 **A.** I don't think I was particularly qualified, but

16 I probably felt that it was the role that I was best

17 suited to working within the whole Royal Mail Group.

18 **Q.** Why?

19 **A.** Because I think I investigated things and was prepared

20 to look outside the box and I had a bit of an empathy

21 with the subpostmasters, I think.

22 **Q.** Do you still think that having looked back at some of

23 your correspondence?

24 **A.** I'm disappointed with some of the things I wrote, yes.

25 **Q.** We can take that document down and before I turn to

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1 necessarily need to put it on the screen -- is that

2 there was a clear intent on the part of the Post Office,

3 with legal advice, to pursue the claim:

4 "... not to make a net financial recovery but to

5 defend the Horizon System and hopefully send a clear

6 message to other SPMs that the PO will take a firm line

7 and to deter others from raising similar allegations."

8 So that was the purpose. It was not ever

9 envisaged that the Post Office would actually get that

10 costs order back. That was loss leader, if you like.

11 But the purpose was to send a firm line and a clear

12 message to deter others.

13 Now, is that how the case was understood at the

14 time? Is that something that your team would have been

15 aware of, that it was a sort of flagship case, if you

16 like, to try to deter others?

17 **A.** No, I don't think so. I was conscious that it was

18 probably the most high profile case at that time but

19 I don't think I would have picked up that message.

20 **Q.** We can also see from documentation that the lawyers in

21 charge of the case were also conscious of other cases,

22 including one which --

23 **SIR WYN WILLIAMS:** Hang on a minute.

24 Do you have any direct knowledge of Mr Castleton's

25 case at all, Mr Winn?

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1 A. No, I don't.

2 **SIR WYN WILLIAMS:** I mean, I'm conscious that this is a very  
3 sensitive case, Ms Page, but don't think it's  
4 appropriate to use the witness just for you to read  
5 extracts of other documents.

6 **MS PAGE:** I was just to about to come to the documents which  
7 he is involved with, sir. So I hope that's.

8 **SIR WYN WILLIAMS:** That's fine.

9 **MS PAGE:** That was a scene setting, if you like.  
10 The related case, if you like, which you were  
11 involved with was a Mr Bilkhu. Does that ring any  
12 bells?

13 A. No.

14 Q. So Mr Bilkhu issued a claim against POL but then  
15 withdrew it because he was threatened with costs of  
16 instructing an expert in the region of £1 million and he  
17 told you about that. Do you remember?

18 A. No.

19 Q. Well we can perhaps then have a look at POL0001304 at  
20 page 29, bottom of the page. This is from him to you.  
21 We can perhaps go to the top of the page, just so that  
22 you can see that. He was writing from Bowburn Post  
23 Office and you can see there at the top, "Dear Mr Wynn",  
24 he has obviously misspelt your name but the  
25 correspondence shows that he had written to you and this

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1 the case can we resumed subject to legal niceties.  
2 "In summary, the case was withdrawn [he is talking  
3 about his case] because POL's legal team demanded that  
4 Horizon accounts at Bowburn [Post Office] for the last  
5 4 years be examined by a forensic accountant. The cost  
6 (estimated at £1 million) be borne by me."  
7 Reading that letter, does that not ring any bells?

8 A. No.

9 Q. The idea that the legal department would threaten  
10 somebody with costs estimated at £1 million?

11 A. No.

12 Q. Looking back, do you think this is part of a culture of  
13 using legal process to threaten subpostmasters?

14 A. It's quite possible, yes.

15 Q. Is that perhaps part of the sort of setting of what  
16 we've seen in your own correspondence of this sort of  
17 putting the burden of proof on the subpostmasters --

18 A. No, I don't think so.

19 Q. -- of using the law against them?

20 A. No, I don't think I've ever threatened anything like  
21 that. I've tried to -- where I can see a way of  
22 investigating/helping, I've tried to do that.

23 Q. Some very brief questions, if I may, on the document  
24 which we've looked at quite a lot, the receipts and  
25 payments mismatch meeting. I just want to look at the

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1 was part of a bit of a back and forth between the two of  
2 you.

3 There's one thing that I'd like to just ask you  
4 about before we go to the bottom. We see the reference  
5 to -- he says:  
6 "Your letter is ... a repeat of ... previous  
7 letter and is similar in style to those I have received  
8 from Michele Graves and Philippa Wright (Flag Case  
9 Managers for Adam Crozier/Alan Cook)."  
10 Do you know what a "flag case manager" was?

11 A. No.

12 Q. Do you know those names?

13 A. Alan Crozier and Alan Cook, yes. The two ladies, no.  
14 I can't remember them.

15 Q. What about the two gentlemen?

16 A. They were heads of Post Office.

17 Q. They were seniors?

18 A. Well, they were executive directors.

19 Q. So you don't recall what the flag case managers did for  
20 them?

21 A. No.

22 Q. If we go a bit further down, we see that Mr Bilkhu tells  
23 you, "In summary", it says:  
24 "... POL may consider the matter closed [that's  
25 his complaint] but I do not. According to my legal team

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1 first page of it again, if I may. It's POL00028838. If  
2 we just look at those Post Office names, who would you  
3 say was the most senior person there?

4 A. Ian Trundell, although Alan Simpson I don't know what  
5 grade he was at.

6 Q. Ian Trundell and Alan -- sorry, did you say?

7 A. Alan Simpson.

8 Q. All right.

9 A. Well, I'm guessing there. I don't actually know what  
10 grade anyone was at.

11 Q. But your first reaction was that those were the two  
12 senior people that meeting?

13 A. Yes.

14 Q. Who would you have reported back to about this?

15 Presumably Mr Ismay?

16 A. Yes.

17 Q. And did you report back to Mr Ismay about this bug?

18 A. I'm -- whether I've talked directly to Mr Ismay or  
19 Mrs Bolsover, I'm not certain, but I would certainly  
20 have fed back as part of normal communications.

21 Q. Thank you. The document can be taken down.  
22 So you are saying you would have reported back to  
23 Mr Ismay and Ms Bolsover; is that right?

24 A. Yes.

25 **MS PAGE:** There's just two more issues I would like to look

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1 at, sir, if I may?

2 **SIR WYN WILLIAMS:** Is anyone else intending to ask  
3 questions?

4 **MR BEER:** Sir, no, they're not.

5 **SIR WYN WILLIAMS:** Fine. Off you go then. Five minutes,  
6 Ms Page.

7 **MS PAGE:** Thank you. If I can look then, please, at  
8 POL00105280. If we could look at page 3 -- and I won't  
9 take you through the whole history up to page 3. Page 3  
10 sort of dives in.

11 This is in the summer of 2013, so this is post  
12 receipts and payments mismatch bug and around the time  
13 when Second Sight's work is pretty well known within  
14 about Post Office, yes, and you're asking a contracts  
15 manager -- this is a discussion with a contracts manager  
16 having been in touch with a branch about a loss that  
17 dates back ten years, and this is your putting three  
18 possibilities for how to deal with it to the contracts  
19 manager. You say:

20 "Hi Nigel, I don't actually disbelieve the branch  
21 here but the claim that two sets of auditors have  
22 recorded missing stock as being present is a bit scary.  
23 Stamps are just pieces of paper at Swindon so there  
24 would not have been a surplus at another branch.

25 "I can see three options. Pay up - we don't  
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1 what's quite interesting is that the response from the  
2 network manager says in paragraph 3 here:

3 "As you say, none of the options are particularly  
4 appealing. I think the first option, making the SPMR  
5 pay up, could open up a can of worms. I'm not sure that  
6 the SPMR is a member of the NFSP but, given that the  
7 amount involved represents a significant percentage of  
8 his salary, I feel sure he would take this further.  
9 This could put us in a position of trying to defend  
10 ourselves against a charge that the auditors didn't do  
11 their job properly and could potentially give the NFSP  
12 or an MP some useful ammunition."

13 So it's again this idea really, isn't it, that  
14 it's about the ammunition, it's about MPs, it's not  
15 really about doing the right thing?

16 **A.** No, I don't think so. I think we were aiming to do the  
17 right thing.

18 **Q.** Well, you did do the right thing but, rather than just  
19 doing the right thing, you're discounting other options  
20 not on the grounds that they're wrong or because you  
21 actually believe the branch but because it could  
22 potentially give the NFSP or an MP some useful  
23 ammunition?

24 **A.** And I think that would be true if we're saying that two  
25 sets of audits were both incorrect. That's not the kind  
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1 believe you. Create a phantom rem out, branches can now  
2 invent ten year old errors that we have to let them off  
3 on because we do not have any information about. Plus  
4 Swindon will not pick up a phantom rem, so I can rem  
5 stamps out and just sell them on my retail side."

6 I think that seems to be a suggestion that you're  
7 making for a way to sort of balance it off. Is that how  
8 I should read that?

9 **A.** Yes, that's how it could have been done remotely,  
10 yes.

11 **Q.** And then network write off:

12 "We believe you and we're making a gesture in  
13 recognition of long years of accurate accounting and his  
14 TC rate is excellent. However, this does leave huge  
15 question marks over the audit process. None are  
16 particularly appearing. Thoughts?"

17 First of all, it's a bit striking, isn't it, that  
18 one of the options is "we don't believe you" when you've  
19 actually said at the start of the email, "I don't  
20 actually disbelieve the branch here"?

21 **A.** I think what I'm trying to do there is make the first  
22 two look at what they were, totally unappealing options,  
23 and the third one is where we're going.

24 **Q.** Well, the third one is indeed where you go.

25 If we go up to the next response, though, page 2,  
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1 of thing you want to advertise particularly when you  
2 don't know if that's the case.

3 **Q.** Well, you do know it's the case. That's the  
4 investigation. That's what's happened.

5 **A.** Well, no, we don't. That was the problem with this  
6 case, that we could understand what the guy was saying  
7 but he's saying that two sets of auditors have come in,  
8 audited the branch. He said there's an issue with these  
9 which is going to get -- needs resolving. So the  
10 auditors have said, "Okay, we'll assume that they're  
11 there". If they weren't there, I mean, that's what an  
12 auditor's job is -- to identify discrepancies. So for  
13 two of them to go in and not, would suggest that any  
14 audit cannot be relied upon.

15 **Q.** So although you believe the SPMR, although you --

16 **A.** I don't disbelieve the postmaster but I don't believe  
17 that two auditors have not done their job properly. So  
18 I'm left a little bit I don't know where we are anyway.

19 **Q.** Just one last, if I may, because this brings us up  
20 a little bit more to date and it's POL00092640 and this  
21 dates from 2015.

22 This seems to relate to what we've come to  
23 understand were weekly Horizon meetings. These were  
24 regular calls -- is that right -- with lawyers involved  
25 as well, people from the security team. Do you remember  
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1 a weekly Horizon meeting being instituted in around 2013  
 2 and carrying on for some time apparently?  
 3 **A.** I don't particularly remember it being a weekly meeting,  
 4 though I accept that it could have been.  
 5 **Q.** You do remember the Horizon meetings, do you?  
 6 **A.** I remember being on Horizon meetings. Whether I was on  
 7 the weekly ones or not I'm not certain.  
 8 **Q.** Well, certainly in relation to this one, it's referring  
 9 to one that's taken place in August of 2015 and it says:  
 10 "As you will see there were numerous issues raised  
 11 on the last call which are of concern."  
 12 First of all, it says:  
 13 "Andy Winn is still receiving requests to  
 14 authorise FJ to correct problems."  
 15 Presumably that's Fujitsu?  
 16 **A.** Mm-hm.  
 17 **Q.** And what I understand that to mean -- and you correct me  
 18 if I'm wrong -- is that that's Fujitsu asking to go into  
 19 Horizon to correct problems and you're authorising them  
 20 to do so. Is that what's going on there? Is that the  
 21 process?  
 22 **A.** I'm not sure what Fujitsu wanted to do but, yes, it's  
 23 asking me to authorise them to do something. I don't  
 24 know what from here.  
 25 **Q.** Well, we've actually got three issues that come up. The

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1 of joined up with that, but certainly as far as I was  
 2 concerned that wouldn't be the case.  
 3 **Q.** Then the paragraph below, just to finish off on this:  
 4 "Andy Winn also raised the issue of a computer  
 5 problem with Camelot for which a fix had been issued but  
 6 pointed out that branches would encounter unexplained  
 7 losses that Wednesday when they conducted their BTS  
 8 procedure. He went on to explain that he had received  
 9 an email from Fujitsu about an incident which had  
 10 occurred in June. It was termed a 'major incident  
 11 report' and related to a branch which had an incorrect  
 12 discrepancy at the time of conducting a branch trading  
 13 statement. The email suggested that information had  
 14 been sent to POL. Andy Winn had not previously known  
 15 about this issue and so asked to whom the information  
 16 had been sent. He had no response.  
 17 "Andy went on to say that he did not fully  
 18 understand the issue and that a maximum of 247 branches  
 19 would have been affected. 118 of those would have  
 20 generated reports based on corrupted data. There was  
 21 only one account in connection with which POL could have  
 22 held someone responsible for the shortfall."

23 So in 2015, following the receipts and payments  
 24 mismatch bug, following the fact that Second Sight have  
 25 become involved, following the fact that that means that

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1 first one is that they asked to do this when kit is  
 2 removed from branches which can cause issues and then,  
 3 secondly, there's the discontinued sessions issue which  
 4 has gone on to explain further, and it talks about two  
 5 new products which caused the system to disconnect and  
 6 recovery scripts are failing.  
 7 So these are two different things which seemingly  
 8 they're having to go into the system to correct and  
 9 you're having to sign off on the process. Is that  
 10 something you recall doing?  
 11 **A.** I would imagine -- I could see myself being the voice  
 12 that would give POL approval, yes, if that makes sense.  
 13 **Q.** It says in the latter part of that paragraph:  
 14 "This is apparently standard business as usual and  
 15 FJ seek authorisation to correct it. It is unclear at  
 16 the present time whether or not there is process  
 17 assurance and documentation. I do not know whether POL  
 18 have full visibility of the actions of Fujitsu and the  
 19 ways in which they correct the branch data."  
 20 Does that ring a bell?  
 21 **A.** It doesn't ring a bell but it makes sense to me.  
 22 **Q.** That there wasn't really a process that was being  
 23 followed?  
 24 **A.** And that I was -- I think I, possibly naively, assumed  
 25 that the IT department were the ones who would be kind

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1 it became apparent that the receipts and payments  
 2 mismatch bug still hadn't been followed up properly,  
 3 you're still having problems, aren't you, at POL with  
 4 actually getting on top of and dealing with bugs that  
 5 affect corrupted data?  
 6 **A.** Is this a receipts and payments mismatch issue?  
 7 **Q.** I don't believe it is. I believe it seems to be  
 8 a different issue. But this is evidence, is not, that  
 9 POL and Fujitsu are still not working through proper  
 10 procedures --  
 11 **A.** Yes, I think so, yes.  
 12 **Q.** All right.  
 13 **SIR WYN WILLIAMS:** Are you going to end on a high note,  
 14 Ms Page?  
 15 **MS PAGE:** Thank you, sir.  
 16 **SIR WYN WILLIAMS:** Is that it, Mr Beer?  
 17 **MR BEER:** Yes, sir. That concludes the questioning of  
 18 Mr Winn.  
 19 **SIR WYN WILLIAMS:** Thank you, Mr Winn, for coming to give  
 20 evidence. It's been a long day clearly.  
 21 **A.** It certainly has.  
 22 **SIR WYN WILLIAMS:** I'm grateful to you that you came to give  
 23 the answers to very many questions.  
 24 **A.** I hope I could be some help.  
 25 **SIR WYN WILLIAMS:** Thank you.

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1 **MR BEER:** Sir, thank you. I think that's us done now until  
2 Tuesday, 7 March when we will hear evidence from Liz  
3 Evans-Jones.  
4 **SIR WYN WILLIAMS:** Yes, all right. Thanks very much.  
5 **MR BEER:** Thank you, sir.  
6 **(4.10 pm)**  
7 **(Adjourned until Tuesday, 7 March 2023 at 10.00 am)**

<b>I N D E X</b>	
2	ANDREW FRANK WINN (affirmed) ..... 1
3	Questioned by MR BEER ..... 1
4	Questioned by MR STEIN ..... 133
5	Questioned by MS PAGE ..... 153

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