

Thursday, 17 October 2024

1
 2 (10.00 am)
 3 **MR BLAKE:** Good morning, sir.
 4 **SIR WYN WILLIAMS:** Good morning, Mr Blake.
 5 **MR BLAKE:** This morning we're going to hear from
 6 Mr Bartlett.
 7 **SIR WYN WILLIAMS:** Thank you.
 8 **JOHN JAMES BARTLETT (affirmed)**
 9 **Questioned by MR BLAKE**
 10 **MR BLAKE:** Thank you very much. Can you give your full
 11 name, please?
 12 **A.** John James Bartlett.
 13 **Q.** Thank you, Mr Bartlett. You have provided three witness
 14 statements in this Inquiry. The first was produced for
 15 Phases 5 and 6 and related to whistleblowing. Can I ask
 16 you, please, to turn to that first.
 17 **A.** Yes.
 18 **Q.** Is that statement dated 25 April 2024?
 19 **A.** It is.
 20 **Q.** Can I ask you, please, to turn to the final substantive
 21 page. That is page 19.
 22 **A.** Yes.
 23 **Q.** Can you confirm that is your signature?
 24 **A.** It is.
 25 **Q.** Can you confirm that that statement is true to the best
 1

1 page.
 2 **A.** Yes.
 3 **Q.** I think that is page 99.
 4 **A.** Yes.
 5 **Q.** Is that your signature?
 6 **A.** It is.
 7 **Q.** Is that statement true to the best of your knowledge and
 8 belief?
 9 **A.** Another amendment, if that's okay.
 10 **Q.** Absolutely.
 11 **A.** Page 57 of that statement. The last sentence in the
 12 second to last paragraph of 76(a), it should say that
 13 A&CI perform an independent sample check of cases. So
 14 that's changing "my" to "A&CI".
 15 **Q.** Thank you, and is that the only change to that
 16 statement?
 17 **SIR WYN WILLIAMS:** I haven't located that yet. Can you tell
 18 me the reference again?
 19 **MR BLAKE:** I think it's page 57, just the final sentence
 20 before the final paragraph.
 21 **SIR WYN WILLIAMS:** Yes.
 22 **MR BLAKE:** "The policy provides that"; is that correct?
 23 **A.** It does.
 24 **SIR WYN WILLIAMS:** Yes, and what was the substantive
 25 amendment?

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1 of your knowledge and belief?
 2 **A.** There's a couple of amendments, if that's okay.
 3 **Q.** Absolutely.
 4 **A.** So on page 62, paragraph 88, the final sentence, which
 5 says, "5 October 2005", could we change that please to
 6 "5 October 2004".
 7 **Q.** Absolutely.
 8 **A.** Page 67, footnotes 132 and 133, amend to 26 July 2019 --
 9 from 26 July 2019 to 29 July 2019.
 10 **Q.** Thank you.
 11 **A.** Page 77, paragraph 92. The first and then into the
 12 second line, amend "March 2015" to "May 2015".
 13 Then the last one on that statement, page 130, so
 14 index entry 125: amend "26 July 2019" to "29 July 2019".
 15 **Q.** Thank you very much. Subject to those changes, is that
 16 statement true to the best of your knowledge and belief?
 17 **A.** It is.
 18 **Q.** Thank you. That has a Unique Reference Number
 19 WITN11190100 and will be uploaded on to the Inquiry's
 20 website.
 21 The second statement was produced for this phase.
 22 Can I ask you, please, to turn to that. Is that dated
 23 22 August of this year?
 24 **A.** It is.
 25 **Q.** Can I please ask you to turn to the final substantive
 2

1 **A.** Sir, that was to remove the word "my" and replace it
 2 with "A&CI".
 3 **MR BLAKE:** I think, actually, that change has been made in
 4 the version I have.
 5 **A.** Ah, thank you.
 6 **SIR WYN WILLIAMS:** So "The policy provides that A&CI
 7 perform", yes?
 8 **A.** Yes, sir.
 9 **SIR WYN WILLIAMS:** Fine. My version has that as well, so
 10 that's fine.
 11 **MR BLAKE:** Is that the only change, or not change, to that
 12 particular --
 13 **A.** That's it, thank you.
 14 **Q.** Is that statement true to the best of your knowledge and
 15 belief, subject to that change?
 16 **A.** It is.
 17 **Q.** That has a URN of WITN11190200 and will also be uploaded
 18 onto the Inquiry's website.
 19 Third and final statement is dated 9 September this
 20 year; is that correct?
 21 **A.** Yes, it is.
 22 **Q.** That addresses the Project May, that's race identity
 23 codes issue?
 24 **A.** Yes.
 25 **Q.** Could I please ask you to turn to page 9?

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1 A. Yes.
 2 Q. Is that your signature?
 3 A. It is.
 4 Q. Is that statement true to the best of your knowledge and
 5 belief?
 6 A. It is.
 7 Q. No changes to that one?
 8 A. No changes.
 9 Q. Thank you very much.
 10 Mr Bartlett, you are currently the Director of the
 11 Assurance & Complex Investigations Team; is that
 12 correct?
 13 A. It is.
 14 Q. That was formerly known as the Central Investigations
 15 Unit?
 16 A. That's correct.
 17 Q. You were appointed to that role on 21 February 2022?
 18 A. To the Head of role, yes.
 19 Q. When did you first join the Post Office?
 20 A. On that date.
 21 Q. Thank you. The Central Investigations Unit became what
 22 we know as A&CI in August 2023, is that correct?
 23 A. That's correct.
 24 Q. Now, taking them separately, what is "assurance", in
 25 Assurance & Complex Investigations Team?

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1 investigations that come out of Speak Up reports.
 2 Q. Thank you very much. Your background is as a former
 3 police officer; is that correct?
 4 A. 17 years ago, yes.
 5 Q. Can you assist us with what rank you achieved in the
 6 police?
 7 A. Detective Constable.
 8 Q. Following that, I think you've worked at various private
 9 sector organisations and also The Pensions Regulator; is
 10 that correct?
 11 A. So I have worked in two financial regulators and two
 12 corporates before coming to Post Office.
 13 Q. Largely, those roles involved investigations?
 14 A. Yes.
 15 Q. Thank you. I think you also have some legal training;
 16 is that correct?
 17 A. I have a legal qualification, rather than training.
 18 I have the graduate diploma in law.
 19 Q. Thank you. How were you recruited to the Post Office?
 20 A. I was approached by an agency.
 21 Q. Thank you. Where were you at that point in time?
 22 A. I was Head of Investigations -- Enforcement
 23 Investigations at The Pensions Regulator.
 24 Q. Thank you. I'd like to begin today by just asking you
 25 about your induction at the Post Office. Did you

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1 A. So the assurance is investigative assurance, so part of
 2 my team's role is to work with, particularly, the Retail
 3 Teams and they look -- they review on a regular basis --
 4 every two months they dip sample cases that are worked
 5 on in the retail space and they look at it from
 6 an investigative practice basis, dip sample, and then
 7 make any recommendations for improvements.
 8 Q. You've mentioned the Retail Team. Lots of teams are
 9 known by different names; what do you mean by Retail
 10 Team?
 11 A. Predominantly the teams that work under Mel Park.
 12 Q. Thank you. And CI, "complex investigations"; what does
 13 that involve?
 14 A. Okay, so that involves cases that we're asked to
 15 investigate in respect to principally sort of
 16 allegations made against senior members of staff,
 17 particularly those at SEG, so the Strategic Executive
 18 Group, or at the Board. It involves looking into what
 19 we call fact finds of where there may be enterprise-wide
 20 or otherwise significant failings -- process failings in
 21 the organisation. So we look at root cause.
 22 It also covers the Project Phoenix, or past
 23 investigations work, that falls under that too and,
 24 within that -- sorry, separate to Project Phoenix but
 25 within the complex or sensitive side, are any

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1 receive any briefings when you first joined on matters
 2 relating to the Inquiry, such as wrongful prosecutions,
 3 Horizon issues, Group Litigation?
 4 A. Yes, I did.
 5 Q. Who provided you with that induction?
 6 A. My boss. So the Group Legal Director.
 7 Q. Who was that at the time?
 8 A. Sarah Gray.
 9 Q. Thank you. That's still Sarah Gray?
 10 A. It is. I also -- sorry, just to complete that, I also
 11 did a one-day induction, which every new joiner goes
 12 through, and they covered those issues as well, there.
 13 Q. Since then, have you been following the developments in
 14 the Inquiry?
 15 A. Yes.
 16 Q. Have you read, for example, the expert reports produced
 17 by Duncan Atkinson KC, or listened to his evidence?
 18 A. I have listened to some of his evidence.
 19 Q. In light of what you have heard from the Inquiry
 20 subsequently, what are your reflections on the training
 21 that you were provided or the induction that you were
 22 provided at the beginning?
 23 A. I think it has been reinforced by the compulsory
 24 training that everybody in Post Office has to do, in
 25 relation to understanding the timeline and the effects

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1 of the scandal and the role that Post Office played in
 2 that. That has certainly assisted that -- I think it
 3 was about a year ago.
 4 **Q.** Thank you. Are you in any way involved in that?
 5 **A.** No.
 6 **Q.** Right. I would like to talk to you about various other
 7 teams at the Post Office that touch upon matters
 8 relating to investigations. The first is what was
 9 called the Security Team, and that's a team that we've
 10 heard quite a lot about in this Inquiry?
 11 **A.** Mm-hm.
 12 **Q.** At paragraph 11 of your second witness statement, you
 13 say that that team stop being responsible for
 14 investigations in 2019; is that correct?
 15 **A.** Yes, although I think, in effect, they'd stopped before
 16 then, but they had it removed from them as part of their
 17 role, as I understand it, then.
 18 **Q.** You've said that they've been renamed the Network Crime
 19 and Risk Support Team; is that correct?
 20 **A.** It is.
 21 **Q.** You say in your statement that they support postmasters
 22 to prevent retail crime in their new role. Can you
 23 assist us with what you mean by that?
 24 **A.** So I have drawn that from material produced by that
 25 team's director, and my understanding from that material

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1 from 1983, was involved in the cases of Peter Holmes,
 2 Allison Henderson, Alison Hall, as examples.
 3 We have on the right-hand side Mr Talbot, who was
 4 a Phase 4 witness in the Inquiry. He had been at the
 5 Post Office since 1987.
 6 We have a little further down there Robert Daily, by
 7 way of example, again longstanding at the Post Office
 8 since 1979. He was involved in a number of cases the
 9 cases of Quarm, the Peter Holmes case, amongst others.
 10 We have Steve Bradshaw, another name that's well
 11 known to the Inquiry. He had been at the Post Office
 12 since 1978 and was involved in a large number of
 13 investigations that had been looked at by this Inquiry:
 14 Janet Skinner, Hughie Thomas, the case of Ishaq, Lisa
 15 Brennan, Lynette Hutchings, Joan Bailey, the Sefton and
 16 Nield case, McKnight case, amongst others.
 17 Are these individuals, or some of them, still
 18 involved in that Network Crime and Risk Support Team?
 19 **A.** Yes.
 20 **Q.** Does that team involve interacting with subpostmasters?
 21 **A.** I believe so.
 22 **Q.** Can you see a problem with that?
 23 **A.** Yes.
 24 **Q.** If we could turn to your second statement, please.
 25 That's WITN11190200. Can you expand: you said you can

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1 and from conversations with them is that it's a crime
 2 prevention or incident response function. But more than
 3 that I couldn't really say because we don't really
 4 interact with them over those issues.
 5 **Q.** Could we please turn to POL00447931. This is a document
 6 that you have exhibited, it's says "Service & Support,
 7 Overview of Teams and Responsibilities":
 8 "Our vision is to champion our postmasters through
 9 easy, reliable and trusted service to give postmasters
 10 confidence that we will deliver the best possible
 11 outcome."
 12 Do you know when this was produced or the
 13 approximate time? The metadata, if it assists, suggests
 14 May 2021. Is this a document that you are, first of
 15 all, familiar with and, second of all, was it around
 16 when you joined the business?
 17 **A.** I don't know. The name change, I think -- I'm not sure
 18 if the name change is connected to this document but the
 19 name change that I'm aware of is much more current than
 20 that date.
 21 **Q.** Thank you. Because, if we turn to page 12 of this
 22 document, it sets out a who's who in the Security Team.
 23 We see there a number of names that are well familiar to
 24 the Inquiry. We have, for example, Security Analyst,
 25 Chris Knight. We know that he was at the Post Office

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1 see a problem with that; what is the problem, as far as
 2 you are concerned?
 3 **A.** I think the work of the Inquiry and from what I know
 4 from Project Phoenix would strongly suggest that it's
 5 not appropriate for those individuals to be interacting
 6 with postmasters, given the behaviour of the past.
 7 **Q.** Could we turn, please, to page 6 of your statement,
 8 that's paragraph 13. You say there:
 9 "I have been asked to provide detail about where the
 10 former Security Team Investigators sit within the new
 11 structure. The Inquiry has linked that request with
 12 recent media reports which suggest those former
 13 Investigators all continue to be employed by Post Office
 14 to conduct investigations. It is right that some
 15 individuals who previously worked in the Security Team
 16 within Post Office remain in the business whilst others
 17 have left. However, none of those remaining are members
 18 of the A&CI team, which now has conduct of all criminal
 19 investigations within Post Office."
 20 So that's true, as far as it goes, that they're not
 21 involved in your particular team and are not involved
 22 directly in those criminal investigations that are
 23 carried out by the Post Office, but do we have to add to
 24 that that a number of them are still involved in the
 25 business, in subpostmaster-facing roles?

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1 A. Yes, but not investigatory roles, as I understand it.
 2 Q. What do you think supporting postmasters to prevent
 3 retail crime involves?
 4 A. From what I've been told, that's around placement of
 5 CCTV, cameras, panic alarms. I think they also do
 6 a review of things like safe codes and things like that.
 7 So it's physical security.
 8 Q. Do you know of any plans or considerations that might be
 9 taking place to either remove those individuals from the
 10 business or to put them in roles where they don't
 11 interact with subpostmasters?
 12 A. I believe that's being discussed, yes.
 13 Q. What is your view as to what should happen?
 14 A. The least should be that they are not in
 15 postmaster-facing roles.
 16 Q. Can you tell us why you think it is that it's taken so
 17 many years to reach a decision on that?
 18 A. I don't know, I'm afraid. I joined two years ago,
 19 I don't know why this wasn't considered before that.
 20 I know it's been discovered -- sorry, discussed during
 21 my time here but I've not been party to those
 22 discussions or any rationale as to why they are there.
 23 Q. Thank you. That can come down, please.
 24 Moving on to another team, Criminal Law Team. Now
 25 you've said in your statement that that was effectively

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1 Office, is the closest we come to that something within
 2 your team that's called the Law Enforcement Engagement
 3 Team?
 4 A. I wouldn't describe it as a Legal Team, no.
 5 Q. Sorry, a criminal team. So a team that has a direct
 6 link to, for example, law enforcement agencies?
 7 A. Yes, there are three and a half people whose role it
 8 is -- is to engage with law enforcement on behalf of
 9 Post Office.
 10 Q. Am I right to say that all criminal investigations will
 11 go through that team?
 12 A. Yes.
 13 Q. Who heads that particular subteam?
 14 A. One of the Senior Investigation Managers in my team.
 15 Q. What's their name?
 16 A. Andrew Morley.
 17 Q. Thank you. In terms of other teams, you've explained in
 18 your witness statement that there's also a Financial
 19 Crime team that deals with things like anti-money
 20 laundering, counter terrorism and anti-bribery and
 21 corruption. Am I right to say that they wouldn't be
 22 involved in matters such as investigating individual
 23 shortfalls in post offices?
 24 A. So they sit in the compliance team, they're not within
 25 my department, and their role is one of really

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1 Jarnail Singh between 2012 and 2015; is that correct?
 2 A. As I understand it, yes.
 3 Q. There is now a criminal lawyer at the Post Office called
 4 Stuart Lill; is that right?
 5 A. Yes, in the Remediation Unit.
 6 Q. So he sits in the Remediation Unit --
 7 A. *(The witness nodded)*
 8 Q. -- addressing matters such as compensation and redress?
 9 A. I think it's around appeals, actually.
 10 Q. Appeals, thank you very much. Does he provide any
 11 advice to your team in respect of criminal
 12 investigations?
 13 A. Yes, he does.
 14 Q. Does he provide any training to your team in respect of
 15 criminal investigations?
 16 A. He provides feedback on a case-by-case basis, and we --
 17 he has attended some of our team -- at least one that
 18 I can remember -- team training sessions where we
 19 discussed disclosure and things like that.
 20 Q. Thank you. Do you know his background at all?
 21 A. I believe he was a prosecutor for -- either for CPS or
 22 for HMRC.
 23 Q. Thank you. Do you know when he joined the Post Office?
 24 A. It was before me but I don't know the precise date.
 25 Q. Thank you. In terms of a Criminal Law Team at the Post

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1 a financial intelligence team. So they manage the
 2 receipt and submission of suspicious activity reports,
 3 money laundering related issues. I'm not aware of them
 4 having been involved in shortfall issues.
 5 Q. In respect of, say, submitting a case to a law
 6 enforcement agency, where the Post Office or a sub post
 7 office has been the victim of a crime, would that not go
 8 through that team; would that go through your team?
 9 A. If Post Office is requesting assistance or reporting
 10 a crime, then that would be through my team, not through
 11 the Financial Crime Team. But they do liaise with law
 12 enforcement, as I understand it, in terms of
 13 longstanding national money laundering projects, best
 14 practice around anti-money laundering, things like that.
 15 So they do deal with law enforcement but on a more
 16 strategical, thematic basis.
 17 Q. Thank you. Then we come to the Retail Team, which is
 18 something we have briefly addressed already. In terms
 19 of investigations into apparent shortfalls at individual
 20 branches, am I right to understand that that is now
 21 principally dealt with by that Retail Team?
 22 A. Yes.
 23 Q. Who would you say is responsible for those
 24 investigations, ultimately?
 25 A. The Retail Team.

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1 Q. Who in particular?
 2 A. So they all sit under Mel Park and so she's ultimately
 3 accountable for those.
 4 Q. Thank you. You say at paragraph 11 of your witness
 5 statement that the Retail Team has supported postmasters
 6 to investigate discrepancies. The suggestion seems to
 7 be in that statement that their involvement only takes
 8 place if instigated by the subpostmaster. Now, is that
 9 right or do they carry out their own investigations?
 10 A. I think it's a combination of the two. I think the vast
 11 majority comes through postmasters identifying, through
 12 the review and dispute process, or through the call
 13 centre. But I am aware of the Market Monitoring Team,
 14 I think they're called, who look at patterns, and that
 15 might commission some work to be done within the retail
 16 space.
 17 Q. Does that team also fall within Mel Park's
 18 responsibility?
 19 A. It does, yes.
 20 Q. Do you know which team will be responsible for pursuing
 21 subpostmasters in the civil courts, should that happen?
 22 A. I'm not aware that that's going to happen. If it would,
 23 I imagine it would start in the retail space but I don't
 24 know because I don't think it's been approved or
 25 planned.

17

1 still in various roles relating to postmasters. Does
 2 anyone involved in the historic investigation of
 3 subpostmasters relating to shortfalls still work for
 4 your team?
 5 A. No, not at all.
 6 Q. Does anybody who was historically involved in
 7 investigating apparent shortfalls work in Retail Team,
 8 as far as you're aware?
 9 A. Not that I'm aware.
 10 Q. How about the Financial Crime team?
 11 A. I don't believe so.
 12 Q. Thank you. In terms of outside firms you've mentioned
 13 in your witness statement, you say at paragraph 31 that
 14 A&CI non-criminal work is supported by nominal,
 15 full-time equivalent staff in external firms assisting
 16 Post Office; can you assist us with what that means?
 17 A. Yes. So due to capacity issues within the team,
 18 ie availability of staff within the team, we regularly
 19 engage law firms to conduct investigations, either as
 20 an extension of our team or, more frequently, where we
 21 feel the investigation would benefit from being
 22 conducted entirely by an external party, and that's when
 23 we engage law firms or professional services firms that
 24 have capability like that.
 25 Q. So law firms, accountancy firms, possibly?

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1 Q. There's no plan for your team to be directly involved in
 2 that, other than, for example, ensuring the consistency
 3 of the Retail Team?
 4 A. I'm pretty sure we would be asked to do that, were such
 5 activity to take place.
 6 Q. Your team, as you've described in your statement, is
 7 principally for high-risk investigations. What about
 8 more mundane, everyday investigations: low level, civil
 9 debts, or what appear to be debts, to the Post Office
 10 caused by, for example, apparent discrepancies?
 11 A. No, we're not involved in those.
 12 Q. So when you say it would likely be your team that
 13 pursues subpostmasters in the civil courts --
 14 A. No, that's -- sorry, that's not --
 15 Q. Sorry, that was my understanding of your evidence.
 16 A. No, we would probably be requested to assure the work,
 17 whichever team, if it happens, would be conducting that
 18 activity. So we'd be the second line of defence in that
 19 regard.
 20 Q. So your involvement would be one of assurance, not of
 21 direct involvement?
 22 A. I believe it would be, yes.
 23 Q. Now, we've looked at various teams, the A&CI team,
 24 Security Team, Retail Team, and we've looked at
 25 particular individuals in the Security Team and they are

18

1 A. Yes.
 2 Q. Any other type of firm that you can think of?
 3 A. Sometimes barristers in an individual capacity but they
 4 are often engaged via a law firm.
 5 Q. Is there any mechanism in place to ensure the quality of
 6 the service that they provide?
 7 A. So those investigations have the same level of oversight
 8 as if we were conducting them. So they will report in
 9 to probably a SEG member, so a Strategic Executive Group
 10 member, there would be a Terms of Reference that would
 11 have to be agreed by that SEG member. That SEG member
 12 will be advised by probably the General Counsel or the
 13 Group Legal Director, and there may well be other senior
 14 members of staff as part of that oversight group.
 15 We're trialling on two investigations something
 16 called an Investigation Oversight Group as a concept,
 17 for our was high-risk cases, and that's how that
 18 operates.
 19 Q. We've heard in previous phases of actions on behalf of
 20 the Post Office being farmed out to external firms like
 21 Cartwright King --
 22 A. Yes.
 23 Q. -- et cetera. Is there any large-scale farming out,
 24 under your team?
 25 A. Not large scale in terms of volumes of numbers because

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1 we don't deal with volumes of -- we're a relatively
 2 small caseload, certainly compared to how it was in the
 3 past that's relevant to this Inquiry. We're not on the
 4 same scale at all. So I would say no, it's not -- they
 5 are frequent and, percentage wise, yes, we do engage
 6 a lot because we're a small team. But it's not at
 7 scale.
 8 **Q.** What proportion of your cases end up at an external
 9 firm?
 10 **A.** Not for -- for non-criminal cases, I'm not entirely
 11 sure. It would be less than half.
 12 **Q.** For criminal cases?
 13 **A.** None.
 14 **SIR WYN WILLIAMS:** Sorry, was that "None"?
 15 **A.** Yes, sir. None.
 16 **SIR WYN WILLIAMS:** Sorry, yeah.
 17 Just so I can understand this process, I think I've
 18 got it, but let's use an example. The Inquiry knows
 19 that Mr Read was subject to an investigation, which
 20 ultimately -- I say "ultimately" -- the last step in the
 21 investigation was by a barrister, Ms Tutin. So is this
 22 what would have happened in practice: that it would have
 23 come first to your team, because that would have been
 24 a high-profile investigation, but, in that instance, you
 25 or someone on your behalf decided that an external law
 21

1 concerned?
 2 **A.** Correct.
 3 **Q.** Who do you consider to be responsible and accountable
 4 for your team at Board level?
 5 **A.** That's in two ways. So we have a Speak Up champion, who
 6 is a Non-Executive Director, Amanda Burton. We also
 7 have an investigations Non-Executive Director champion,
 8 who is Andrew Darfoor, now. So we have -- I report in
 9 to them, they are monitoring what we do.
 10 **Q.** Do they speak on your behalf at Board meetings?
 11 **A.** I believe they have, yes.
 12 **Q.** Thank you. If we zoom out, please, we can see that
 13 there are, including you, 18 members of staff here in
 14 your team. Is that the current position; has that
 15 changed?
 16 **A.** No, I think we're one fewer.
 17 **Q.** So 17 including yourself?
 18 **A.** Including the Project Phoenix team, yes. If you take
 19 them out, I think it's nine.
 20 **Q.** Thank you very much. If we could take that down,
 21 please.
 22 I want to move on to the KPMG report, focusing in
 23 particular on the issue of training, but we'll look at
 24 their findings. We've already looked at them in the
 25 Inquiry, so I'm not going to take a great deal of time
 23

1 firm should be involved, a firm of solicitors, who in
 2 turn instructed Ms Tutin, and then she made her report
 3 back; is that it in summary form?
 4 **A.** That's a proper description of the process, sir, yes.
 5 **SIR WYN WILLIAMS:** Fine. Thanks. Yeah, okay.
 6 **MR BLAKE:** I'd like to look at the oversight of your team's
 7 work. Can we please turn to POL00447971. This is
 8 a team organogram. It might be difficult to see but, if
 9 we could just look at the top, thank you. If we could
 10 focus on the top half. Is it possible to zoom in
 11 a little more? We can see your name is on the left-hand
 12 side -- thank you very much -- the third row down. Can
 13 you see your name there?
 14 **A.** I can.
 15 **Q.** It appears that you report to Sarah Gray, who is now the
 16 Interim General Counsel.
 17 **A.** Correct.
 18 **Q.** I don't believe she reports to Ben Foat currently?
 19 **A.** Not currently.
 20 **Q.** No. Am I right to say there is no direct line from
 21 yourself to the Group Executive?
 22 **A.** Sarah sits on the SEG so I would say that's the link
 23 there.
 24 **Q.** Thank you. So, essentially, Sarah Gray is responsible
 25 for your team insofar as the Executive level is
 22

1 going through every individual one. You've set out
 2 their key findings at paragraph 17 of your statement.
 3 Can we please turn to POL00423697.
 4 This is the Project Birch report. That was
 5 commissioned and also produced prior to you joining the
 6 Post Office; is that correct?
 7 **A.** That is correct.
 8 **Q.** We see there at the bottom, 13 August 2021. Was this
 9 a document that was brought to your attention pretty
 10 soon into taking up the role?
 11 **A.** Day one.
 12 **Q.** Thank you. If we could scroll down, please, to page 4.
 13 We see there the context. I'll very briefly take you
 14 through that:
 15 "Whilst Post Office no longer bring private
 16 prosecutions it continues to perform a variety of
 17 investigations as required, across its business.
 18 "The Post Office's vision is that these
 19 investigations be conducted to the appropriate standard
 20 by appropriately qualified individuals and adhere to the
 21 market practice with the necessary records created,
 22 maintained and retained so [that the Post Office] can
 23 discharge all its obligations, now and in the future,
 24 including those required by statute."
 25 It sets out there that:
 24

1 "Post Office engaged KPMG to undertake a review of
2 its current investigations process as set out in our
3 terms of engagement dated 30 June 2021."

4 What was your view on receiving this?

5 **A.** I think it was the basis of the establishment of the
6 team that I was asked to build and their recommended
7 approach seemed to make a lot of sense, a centralised
8 function. It's something I've seen in other corporate
9 entities, and it seemed logical.

10 **Q.** Thank you. Could we please turn to page 10, and it sets
11 out there the "Executive summary". As I've said, we've
12 been through these before, so we'll speed through them.

13 The first significant bullet point there on the
14 right-hand side:

15 "Investigations are not conducted consistently
16 across [the Post Office]."

17 Is that the very purpose for the establishment of
18 your team?

19 **A.** Yes, particularly the assurance piece of my team.

20 **Q.** Thank you. If we scroll down, please, we see more
21 bullet points. Over the page:

22 "Lack of overarching governance and oversight over
23 high-risk investigations."

24 Again, that's essentially the purpose of your team,
25 isn't it?

25

1 Area Managers and line managers are not used.

2 Training, we're beginning to address. There's more
3 to do there, and we've just got a new case management
4 tool.

5 **Q.** If we scroll up to the bullet points above, how about in
6 respect of those?

7 **A.** Okay, so quality assurance is absolutely under way.
8 I think there will probably be more teams that we are
9 asked to assure but, at the moment, we have -- we're at
10 capacity in terms of teams. But there is a consistent
11 approach to that that's been validated by the Group
12 Assurance function.

13 Lessons learned, we have a process now where lessons
14 learned from investigations are collated by Group
15 Assurance, and followed through by them. Monitoring and
16 reporting, we've centralised investigations to a greater
17 extent and we operate a triage function within my team.

18 **Q.** If we scroll up, I think we've addressed the first -- is
19 there anything additional you'd like to say about the
20 first bullet point on implementation?

21 **A.** So all the assurance work in non-A&CI teams of -- sorry,
22 of non-A&CI teams, one of the drivers for that assurance
23 work is to drive consistency and so, yes, that is being
24 dealt with.

25 **Q.** Thank you. You've highlighted in your witness statement

27

1 **A.** It's one of them, yes.

2 **Q.** "There is no clear, consistent triage process in place
3 across [the Post Office] ...

4 "Lack of consistent monitoring and reporting of all
5 investigations ...

6 "There is no consistent approach to quality
7 assurance across the business teams ...

8 "There is limited evidence of 'lessons learnt', and
9 continuous improvement arising from investigations
10 across [the Post Office] ..."

11 Over the page, please:

12 "Business teams often use Area Managers and Line
13 Managers to conduct investigations ...

14 "There is a lack of training in respect of
15 investigations across [the Post Office] ...

16 "There is no consistent use of an investigations
17 case management tool across [the Post Office] ..."

18 That's the final substantive recommendation or
19 observation.

20 In your view, have all of those been addressed?

21 **A.** The first bullet point about use of Area Managers and
22 line managers, in a grievance context, so within the ER
23 area, that still takes place, but that's outside of the
24 remit that my team has. So for fact-finding, for
25 accountability investigations and for any criminal ones,

26

1 in particular the training issue. Is it your view that
2 of all of those bullet points, the training is the one
3 you're the most far behind in implementing?

4 **A.** Refresher training, yes.

5 **Q.** You explain that there have been delays in getting it up
6 and running; is that correct?

7 **A.** Yes, we've engaged with -- so I think the focus of the
8 questions that I was asked to answer in my witness
9 statement was primarily focused on criminal
10 investigations. So, in terms of refresher training or
11 primary training for investigative work around the
12 criminal conduct, it is behind but we've been engaging
13 with the College of Policing and two of my staff are
14 doing fraud investigation apprenticeships.

15 **Q.** Is the plan for you to adopt College of Policing
16 training, a package?

17 **A.** Yes, absolutely.

18 **Q.** I think it was two and a half years after this KPMG
19 report that that approach was made or the first meeting
20 took place with the College of Policing; is that
21 correct?

22 **A.** So it was a year after my team started.

23 **Q.** Can you assist with why that took so long?

24 **A.** There was a lot of other things going on and we were
25 trying to work out what requirements the Post Office had

28

1 around criminal investigations because that would
 2 determine the nature of the training that would -- or
 3 refresher training as well, and ongoing training that
 4 would be required.

5 **Q.** Is the current position that there is not yet a training
 6 programme in place?

7 **A.** We've had a needs analysis completed by the College of
 8 Policing. They've proposed a training package, which we
 9 would like to do, and we're just waiting for a formal
 10 offer, if you like, of what that training would be, both
 11 upfront, refresher and ongoing. But, as soon as we can
 12 get that in writing, we'd like to agree it.

13 **Q.** When do you expect that to take place?

14 **A.** I don't know. That sits with the College of Policing at
 15 the moment.

16 **Q.** So you're waiting on them to put forward the proposal?

17 **A.** They have given us a provisional proposal, which we've
 18 given positive feedback on and we're just waiting for it
 19 formally now.

20 **Q.** Are we talking months, years?

21 **A.** Well, certainly not years. I'm hoping one or two
 22 months.

23 **Q.** Thank you. That's the College of Policing. So,
 24 presumably, they can assist with the legal issues
 25 relating to the preservation of evidence and matters

29

1 Tier 3, within Retail. We follow that practice and that
 2 experience but, ultimately, if it's something that we're
 3 not sure about, then we can approach Simon Oldnall's
 4 team, the Horizon IT Team, in the first instance, and
 5 seek their advice. We have done that on other technical
 6 datasets before and it's worked very well.

7 **Q.** In terms of the training that's provided by, for
 8 example, the College of Policing, how are you going to
 9 link that up with the wider teams that are involved in
 10 investigations, such as the Retail Team that you've
 11 spoken about?

12 **A.** So we're going to -- we will build in any developments
 13 or new processes or procedures that we get from that
 14 training, we'll consider it for inclusion in our
 15 assurance work, and it will be through the assurance
 16 work framework -- so the assurance framework that that
 17 will percolate into the Retail Teams.

18 **Q.** So are we to understand that, for example, your team go
 19 to a training session with the College of Policing,
 20 they'll have that training and then they will then train
 21 the teams below them, or other teams in the business?

22 **A.** Yes, so depending on the significance of any changes or
 23 new approaches, we can either -- the plan will be to
 24 either give an actual training session, probably
 25 starting with the team leaders in retail. But, in any

31

1 such as that. What about covering, for example, the
 2 interpretation of Horizon data, how to analyse Horizon
 3 data; how is your team going to be trained in that?

4 **A.** So one of the aspects that we asked them to look at is
 5 whether or not the transaction analysts -- I have two in
 6 my team -- whether their methodology could be accredited
 7 or approved by the College of Policing. They're still
 8 looking into that aspect as to how that could happen but
 9 that is something that we would like the College of
 10 Policing to do.

11 **Q.** Who provides them with training as to what it means,
 12 what the printout from the Horizon system means, what
 13 the ARQ data, for example, from Fujitsu means; who
 14 assists them in understanding that?

15 **A.** So one of the two came from the Tier 3 Retail Team so he
 16 had all of their training and experience and he's
 17 brought that in and he's effectively mentoring the other
 18 transaction analyst, who is an experienced intelligence
 19 data analyst from HMRC.

20 **Q.** What about investigations of underlying problems with
 21 the Horizon system itself: how is your team going to be
 22 trained to be able to interrogate the Horizon system or
 23 to properly understand issues such as bugs, errors,
 24 defects in the Horizon system?

25 **A.** So there is a process and guidance for doing that within

30

1 event, it will be considered as to whether it should be
 2 folded into the multiple sets of criteria that we have
 3 agreed with each of the different teams that we assure.

4 **Q.** I appreciate you haven't been at the Post Office for all
 5 that long but is it disappointing that these kind of
 6 changes to training haven't already been implemented?

7 **A.** Yes.

8 **Q.** Where would you say responsibility for that lies?

9 **A.** I'm not sure I can place that at any particular personal
 10 group's door but I think what I can say is I'm not sure
 11 Post Office, in 2019, thought they needed to understand
 12 what had gone wrong in the investigation process.
 13 I think that is evident. And the reason I feel I can
 14 say that is Project Phoenix was not commissioned then
 15 when perhaps it should have been.

16 **Q.** So that's a broader concern but are there any particular
 17 individuals who you would say that responsibility lies
 18 with?

19 **A.** I wouldn't know. I wasn't in the Post Office then, I'm
 20 afraid.

21 **Q.** Was it something that you understood when you came in to
 22 the business that there was that lack of introspection?

23 **A.** I think the fact that a CIU was required and authorised
 24 was indicative of a change of approach, that there was
 25 a recognition that professional investigations

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1 capability was required and that it needed to be
 2 conducted not by people entirely brought through Post
 3 Office.
 4 **Q.** Who, in your view, was responsible for that change in
 5 approach?
 6 **A.** Sarah Gray and Ben Foat.
 7 **Q.** Thank you. I'd like to move on to various policies and
 8 procedures. You've addressed the investigations
 9 policies, the two current key investigations policies,
 10 at paragraph 48 to 49 of your witness statement. They
 11 are the Group Investigations Policy, the GIP, and the
 12 Cooperation with Law Enforcement Agencies and Addressing
 13 Suspected Criminal Misconduct Policy -- is that
 14 correct -- that's the CLEP?
 15 **A.** Known as the CLEP, yes.
 16 **Q.** Thank you. Those policies date back to 2021; is that
 17 right?
 18 **A.** That's correct.
 19 **Q.** They pre-date your joining --
 20 **A.** They do.
 21 **Q.** -- and there is now a new policy that is being
 22 developed, that's known as the Group Investigation and
 23 Cooperation with Law Enforcement Policy, the GICLEP?
 24 **A.** We refer to it as the Proposed Combined Policy but, yes,
 25 it is that.

33

1 **Q.** It's called a "Draft", on the front page it says, "Draft
 2 for comment"; what stage do you say this is currently
 3 at?
 4 **A.** It's a discussion document.
 5 **Q.** Discussing with who?
 6 **A.** Board and SEG.
 7 **Q.** Has it gone to both of those groups?
 8 **A.** They've discussed some of the concept in them. I have
 9 provided it to both groups and, in two weeks' time, it's
 10 going to be discussed by the Board and next week it's
 11 being discussed by SEG.
 12 **Q.** Do you expect that it will be adopted in its current
 13 form?
 14 **A.** I think SEG will support it; I'm not sure about Board.
 15 **Q.** Why are you not sure about the Board?
 16 **A.** Some of the feedback or commentary on one or two parts
 17 of this that I've had would suggest that one or two of
 18 the members of the Board want to discuss it further.
 19 So, therefore, I don't think that they will, without
 20 those discussions, want to say yes, go through the
 21 governance process to have it approved.
 22 **Q.** Can you assist us with what in particular their concerns
 23 are?
 24 **A.** I think, in particular, is the element around changing
 25 the current requirement that the CLEP has for Board to

35

1 **Q.** So, in effect, combining those two previous policies,
 2 the GIP and CLEP to create a single unified policy?
 3 **A.** Yes, correct.
 4 **Q.** Can we please turn to POL00448353; is this the current
 5 draft of that policy?
 6 **A.** Yes.
 7 **Q.** So we see there version 2.2 but it's still a draft for
 8 comment. What stage of development do you say this
 9 policy is up to now?
 10 **A.** So, just to clarify, this is the current CLEP?
 11 **Q.** Yes.
 12 **A.** So that is in force. I don't know why it has "Draft" on
 13 it.
 14 **Q.** Thank you. This is the CLEP?
 15 **A.** Yes.
 16 **Q.** Not the GICLEP?
 17 **A.** I would need to see the next page, but looking at that
 18 ...
 19 **Q.** Even though it's called Group Investigations &
 20 Cooperation with Law Enforcement Policy, if we scroll
 21 over?
 22 **A.** Apologies, yes, you're right. That is the proposed new
 23 document. My mistake, sorry.
 24 **Q.** So this the combined policy?
 25 **A.** This is the combined document.

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1 approve the provision of certain types of evidence to
 2 law enforcement.
 3 **Q.** This policy would make it easier for your team to pass
 4 information to law enforcement without Board approval;
 5 is that right?
 6 **A.** It would remove the requirement to go to Board. It
 7 would put in place a different governance structure
 8 around that material being passed but, yes, it would --
 9 we would notify Board of what's happened. That's clear
 10 in the feedback that I've had from the Chairman, for
 11 example, that that's what he would like. He -- the
 12 feedback I've had is that the Chairman would approve
 13 that change in responsibility but they would like to
 14 know volumes, trends, characteristics.
 15 **Q.** Can you assist us with who, at Board level, is not happy
 16 for that change to take place?
 17 **A.** Elliot Jacobs, one of the Postmaster NEDs.
 18 **Q.** Just him?
 19 **A.** That's -- he's the only person I've been aware of with
 20 feedback.
 21 **Q.** Thank you.
 22 Can we bring up onto screen your second witness
 23 statement. It's WITN11190200. I'd like to look at
 24 page 6 and into page 7. In your statement you have
 25 identified some criticisms that have been made from the

36

1 Group Litigation and from the Hamilton appeals, and
 2 you've identified and set those out in your statement.
 3 I'd just like to take you through those and, really, my
 4 question is how this new policy addresses those
 5 criticisms.
 6 **A.** Okay.
 7 **Q.** Thank you. So it's paragraph 14, and you say there:
 8 "The GLO Judgments and the decisions of the Court of
 9 Appeal in Hamilton & Others ... were critical of the
 10 Post Office's approach to investigations, specifically
 11 in relation to apparent shortfalls and discrepancies
 12 shown by Horizon. In particular and in summary, those
 13 criticisms included:
 14 "(a) That the Post Office operated with the
 15 presumption of culpability ..."
 16 Is that addressed in your new policy and, if so,
 17 how?
 18 **A.** Yes, it's pretty explicit in there that you have
 19 an investigative mindset, which is open, you make no
 20 presumptions of anything and you follow the evidence and
 21 lines of inquiry, including towards or away from any
 22 investigative hypothesis that you might have.
 23 **Q.** "(b) That Post Office provided insufficient information
 24 to postmasters who had shortfalls during the
 25 investigation and before and during proceedings ..."

37

1 **A.** Yes.
 2 **Q.** Part of that might include an interview, for example?
 3 **A.** No.
 4 **Q.** That's not the case?
 5 **A.** No. We don't do interviews with postmasters.
 6 **Q.** Is that not part of the proposal in the new policy?
 7 **A.** No.
 8 **Q.** Okay. Well, we'll get to that and we'll have a look at
 9 the section on investigations?
 10 **A.** So it's worth noting that this policy isn't just
 11 about -- doesn't just cover investigations into
 12 postmasters; it's any investigation. So the piece about
 13 interviewing, or -- it is interviewing -- interviewing
 14 people largely relates to Post Office Limited's staff.
 15 We do not -- so as the proposed policy is explicit,
 16 which the previous policy wasn't -- is, we will not do
 17 interviews under caution.
 18 **Q.** Thank you. If we scroll down, (c):
 19 "That there was poor communication with postmasters
 20 throughout an investigation with the outcome that
 21 postmasters were unable to examine the issue themselves
 22 ..."
 23 Is that something that is addressed in the policy
 24 and, if so, how?
 25 **A.** Yes, so if you take the investigations conducted in

39

1 Again, is that addressed and, if so, how?
 2 **A.** I think that's principally addressed in the processes
 3 within the Retail Teams that look at shortfalls.
 4 **Q.** So the responsibility for addressing that, you see, as
 5 lying with the Retail Team?
 6 **A.** Yes, but what I would say is if we had cause to
 7 investigate anything like that, we would make that
 8 information available, if it's a criminal matter, to the
 9 police, for example.
 10 **Q.** How about making it available to the subpostmasters,
 11 say, if a subpostmaster is being investigated?
 12 **A.** We wouldn't investigate a subpostmaster for anything
 13 other than something that might be criminal, and we
 14 don't investigate people anyway. That is a principle
 15 within the policies: that we investigate circumstances
 16 or events; we don't investigate people.
 17 **Q.** Do you have guidance as to how much information should
 18 be given to a postmaster if they are going to be
 19 investigated --
 20 **A.** So that --
 21 **Q.** -- for criminal conduct?
 22 **A.** For criminal conduct, the police carry those
 23 investigations, not us.
 24 **Q.** But you carry out a level of investigation to identify
 25 whether it is sufficient to provide to the police?

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1 retail space or, to some degree, within the Contracts
 2 Team, they should be sharing information with the
 3 postmaster as they go along or at the conclusion of
 4 their reporting. To the extent that the Dispute
 5 Resolution Team, when they produce a report following
 6 their investigations, they consider that they are
 7 writing those reports for the postmaster.
 8 **Q.** Thank you:
 9 "(d) That there were failures to follow all
 10 reasonable lines of inquiry, including potential
 11 alternative explanations provided by postmasters."
 12 **A.** Yes.
 13 **Q.** Is that addressed and, if so, how?
 14 **A.** So it is. It's covered in more detail in the
 15 Investigator's Manual, which is the aid for people
 16 conducting investigations. It's not a policy; it's
 17 a guidance document. But, yes, lines of inquiry is
 18 essential.
 19 **Q.** How is that addressed?
 20 **A.** I think it's in there as a policy statement, which is
 21 "You will follow lines of inquiry towards or away from
 22 the investigative hypothesis".
 23 **Q.** "(e) Suspicions of knowingly making false assertions
 24 relating to the reliability of Horizon data ..."
 25 **A.** Yes, so in the -- I think in the policy we talk about

40

1 the purpose of an investigation is to establish the
 2 truth, not to achieve a particular outcome, and I think
 3 that fits in there.

4 **Q.** "(f) That Post Office failed to discharge properly the
 5 duties of a prosecutor, especially in respect of
 6 disclosure."
 7 Now, you're no longer the prosecutor but how else is
 8 that addressed?

9 **A.** Well, we state we're no longer a prosecutor and we
 10 say -- and we will assist any prosecutor or
 11 Investigations Team in the discharge of their disclosure
 12 obligations.

13 **Q.** What do you see as your disclosure obligations?

14 **A.** Well, I think, on a strictly legal basis, if we're not
 15 the investigating authority or the prosecuting
 16 authority, we don't legally have one under CPIA, but we
 17 adopt that as a concept. You know, it's something that
 18 we support and we would provide whatever law enforcement
 19 want. To the extent that, if they move towards the
 20 disclosure phase of their investigation prior to it
 21 going to a prosecutor or a prosecutor moving to
 22 disclosure to another party, then we will give them
 23 everything we have.

24 **Q.** When you say "everything", what do you mean by that?

25 **A.** So the contents of the case file, and we will not apply
 41

1 statements, whatever is necessary. So I guess it's the
 2 concept of transparency in investigations, and that
 3 transparency has to be based on the retention of
 4 material to begin with.

5 **Q.** You've mentioned in terms of this policy that, when it
 6 gets to Board level, there will be some further
 7 discussion at least in respect of one aspect. But why,
 8 in your view, has it taken so long to get to this stage,
 9 and it's still not completed?

10 **A.** So part of it is volume of work within the team.
 11 Principally, at the senior -- my level and my direct
 12 reports, we've had a volume of operational work,
 13 investigative work, setting up the assurance function
 14 that has meant that we had to deprioritise something; we
 15 couldn't do it all. So we that to deprioritise the
 16 formalisation of that policy.

17 **Q.** We've heard evidence from some witnesses about a fear of
 18 decision making and a fear of accountability within
 19 certain levels of the Post Office.

20 **A.** Mm-hm.

21 **Q.** To what extent has that contributed to these new
 22 policies not yet being implemented?

23 **A.** I think that's -- I think that applies to this as well.

24 **Q.** Where do you say the responsibility lies for that?

25 **A.** SEG.
 43

1 any form of relevancy test.

2 **Q.** A case file might include internal logs, internal
 3 comment; is it envisaged that those kinds of things will
 4 be passed to the police?

5 **A.** Yes, well, we -- I think we'd have to apply some common
 6 sense but that would be in discussion with law
 7 enforcement. So we would open our file, I guess, in
 8 effect, to them, and then talk through what material we
 9 have, what material they want to consider, as part of
 10 their relevancy test, and then we will give it to them.

11 **Q.** Thank you. Are there any other significant changes made
 12 in that draft policy that you can point to that you
 13 believe will make a significant difference?

14 **A.** So in there we talk about the retention of material.
 15 I think that's important, the material that is received
 16 or generated in the course of an investigation, and it
 17 doesn't have -- it shouldn't be restricted to criminal
 18 investigations; it should be any investigation. That
 19 material should be retained, and we should be prepared
 20 to reveal it.

21 So for example, if there's an investigation that
 22 leads -- not in my area but in the contract space, for
 23 example, they should be prepared to show material
 24 evidence to postmasters or any other party that's there.
 25 So show them CCTV, show them analysis reports, witness
 42

1 **Q.** The Senior Executive Group?

2 **A.** Yes.

3 **Q.** Thank you. You've mentioned the Investigator's Manual
 4 perhaps we can turn to that, that's POL00448014.
 5 This is a document that is in force, it has been
 6 approved, I think, in June 2023; is that correct?

7 **A.** Yes, that's perhaps giving it a higher status or
 8 authority than perhaps it should have.

9 **Q.** Because it's not a policy; it's a guide?

10 **A.** Correct.

11 **Q.** This particular version is 19 September 2023, version
 12 1.1. Is that the most up-to-date version, as far as
 13 you're aware?

14 **A.** I'm not sure. There is constantly -- it's meant to be
 15 a living document, so it's not -- there will be
 16 different versions. I know another one is being worked
 17 on at the moment, to some degree. It has been paused
 18 pending the discussions in the next couple of weeks
 19 around the new policy because, obviously, that will have
 20 implications for the guidance that's required.

21 **Q.** Where does this sit with those other guides -- other
 22 policies, sorry -- that you've mentioned?

23 **A.** So it's not a policy. This is a manual, it's not
 24 even -- it's not a procedural document. It's guidance.
 25 I think it's been described as a handrail for
 44

1 investigators.

2 **Q.** But it presumably needs to be consistent with the

3 policies --

4 **A.** Yes.

5 **Q.** -- and will therefore be adapted as the policy adapts?

6 **A.** Yes, and, of course, policies are not "how to" guides;

7 policies should be a statement of a particular position

8 on an issue.

9 **Q.** Thank you. If we scroll over the page we can see how

10 it's described in the foreword. It's page 4.

11 "The Post Office is committed to doing things

12 correctly. Our Values and Behaviours represent the

13 conduct we expect. This expansive and detailed manual,

14 its guides and templates support those of our colleagues

15 charged to help us ensure the highest standards of

16 integrity, proper behaviour, crime prevention, detection

17 and case management are maintained."

18 Did you draft this or presumably this is one of the

19 first documents that you were involved in, having joined

20 the Post Office?

21 **A.** It was a team effort, so the team put this together, and

22 then sections of it that relate to the operations in

23 other teams, so for instance the Retail Teams, they had

24 an input too and provided their elements of this manual.

25 **Q.** Thank you. If we could scroll down the page and into

45

1 investigation or provide clarification on matters or

2 systems relating to the investigation."

3 So that's somebody, presumably, who isn't suspected

4 of something, they might be a witness?

5 **A.** They can help the investigation, yes.

6 **Q.** Thank you:

7 "A conduct interview is conducted with a person

8 suspected of breaching Group policy or regulation and

9 there is no suggestion that a criminal offence may have

10 occurred. Authority to conduct this type of interview

11 must be obtained from the investigator's line manager

12 ... designated deputy."

13 What does that mean: investigator's line manager

14 designated deputy?

15 **A.** The interviewer's line manager or someone that might be

16 acting in their stead. So, for example, if the line

17 manager is on annual leave or sick, then someone should

18 be acting in that capacity.

19 **Q.** Should that be line manager or designated deputy?

20 **A.** Yes, there should be a space between the "R" and the

21 "O".

22 **Q.** Ah, manager or -- yes, thank you very much:

23 "A criminal conduct interview is conducted with

24 a person who is suspected of committing a criminal

25 offence and may be conducted by a police officer or by

47

1 the "Introduction", we see there:

2 "This manual is intended to provide clear guidance

3 on the considerations that must be made when conducting

4 investigations. It is not intended to be a training

5 manual for Investigators. The manual prescribes the

6 professional standards which the Group expects of all

7 those that undertake investigations on its behalf."

8 Is this used not just by your team, then, but by the

9 other teams within the business who carry out the lower

10 level investigations?

11 **A.** Correct.

12 **Q.** Could we please turn to page 16. This is actually the

13 section I mentioned before. I'd just like to spend

14 a bit of time looking at "Interviews". It says there:

15 "This guidance applies to all types of investigative

16 interviewing, not only to interviews conducted as part

17 of a criminal investigation. The principles are based

18 on ensuring fairness to interviewee but also to

19 facilitate an appropriately effective investigation."

20 Then it sets out three different types of interviews

21 that might be conducted: witness interviews; conduct

22 subject interviews; and something called criminal

23 conduct subject interviews. It says:

24 "A witness interview is conducted with persons who

25 are able to provide testimony to the event under

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1 appropriately trained, professionally qualified and

2 experienced investigators within A&CI. Authority to

3 conduct such interviews can only be authorised by the

4 Head of A&CI [that's you] or their designated deputy.

5 "When conducting interviews, IOs ..."

6 What's an "IO"?

7 **A.** That's shorthand for the person that's conducting the

8 investigation.

9 **Q.** An investigation officer?

10 **A.** Yes.

11 **Q.** "When conducting interviews, [investigating officers]

12 must comply with the seven College of Policing

13 investigative interview principles. These principles

14 apply to all interviews, whether part of a criminal

15 investigation or any other form of investigation."

16 So there is something called a criminal conduct

17 interview but, as you have previously said, that is not

18 something that you envisage taking place under caution;

19 is that correct?

20 **A.** So, when -- if it would help, I could explain the

21 background to this section.

22 **Q.** Yes, please.

23 **A.** So when we first were tasked to start the team in early

24 2022, there was consideration that our team might do

25 interviews under caution in relation to suspected

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1 offences against Post Office. That affected the
2 drafting of this. That intent changed and so the new
3 version of the manual, when we know where we stand, in
4 terms of what's expected of us, this section will
5 entirely come out.

6 **Q.** So, in future, will you just have two different types of
7 interviews or something else?

8 **A.** No, I think it would be a general witness who can assist
9 us within the Post Office or, indeed, outside the Post
10 Office, and then there will be the -- we call them
11 accountability investigations, so anyone who, during the
12 course of that investigation, might potentially be held
13 accountable for an event that we were asked to
14 investigate but that would not include anything
15 suspected -- a suspected criminal offence.

16 **Q.** So, I mean, I'm not asking you to redraft this right now
17 but, if you could summarise what it might say in future,
18 once the proposal is passed, what do you envisage this
19 will say, in broad terms?

20 **A.** Okay. So I'm expecting us to adopt the general
21 guidelines around how to conduct an effective,
22 sensitive, witness interview. So --

23 **Q.** So those College of Policing investigative interview
24 principles will stay, will they?

25 **A.** No, because they relate to the conduct of a criminal
49

1 "because we would like to talk to you about X, Y and Z
2 which we think you could help us with".

3 Then there are various bits about "You can have
4 a friend", and stuff that goes with that.

5 In terms of conduct, sometimes people might start as
6 a witness, and then as the evidence evolves, that may
7 change, in that they may then be accountable for
8 something they've done and that would be made clear to
9 them during the course of that interview, or any
10 subsequent interview.

11 **Q.** Is that not problematic because somebody may say things
12 in an interview that they shouldn't be saying, because
13 they think you're interviewing them as a witness when in
14 fact your officer may suspect that they're more than
15 just a witness?

16 **A.** Not outside of a criminal context, no, because I think
17 you may go into an interview not really knowing what
18 this person can tell you, or having one set of views
19 based on what has been said by other witnesses, and then
20 that might change during the course of the
21 investigation. Bearing in mind we don't do -- the
22 resulting output of any of those accountability type
23 investigations, the worst-case scenario is that we would
24 make a recommendation that ER would conduct a code of
25 conduct type investigation, based on information we have
51

1 investigation. So we would look at things like we can
2 look at the ACAS guidelines, we can look at College of
3 Policing do give guidance on dealing with -- on
4 interviewing witnesses -- vulnerable people and
5 witnesses generally. So we can look at drawing on that
6 sort of material, but also the ACAS side because we can
7 balance that -- those two approaches.

8 **Q.** Will a person who is being interviewed know whether they
9 are being interviewed as a witness, as somebody whose
10 conduct is suspected of wrongdoing in some way and
11 whether -- here we have a third category -- something
12 even more serious than that.

13 **A.** Yes.

14 **Q.** Will they be told the actual level of seriousness of
15 that interview?

16 **A.** They are, effectively, already. So because of our
17 history, we tell people who might be witnesses of any
18 type that they are not going to be interviewed under
19 caution because we want to be really clear about that
20 upfront, so they don't worry about that and they know
21 this isn't going to result in a criminal issue. We say
22 to them -- we write to people internally, Post Office
23 Limited staff, and say, "We would like you to meet with
24 the investigator", that could be one of my team, it
25 could be an external lawyer, for example, doing it,
50

1 gathered. So they would then have another opportunity
2 to speak with ER, and do it that way.

3 But --

4 **Q.** "ER" being Employee Relations?

5 **A.** Yes.

6 **Q.** I mean, is it not possible that you might pass on the
7 information to the police?

8 **A.** We haven't seen any of those so far and we -- I guess
9 theoretically, yes, but, on issues that are potentially
10 criminal, we try not to deal with too many people that
11 would muddy the evidential environment for the police.

12 **Q.** How is that going to work, in practice, though, because
13 let's say you have a subpostmaster, you're not sure if
14 I they have been committing a crime, there's a --

15 **A.** We don't interview postmasters.

16 **Q.** You won't interview any subpostmasters?

17 **A.** Well, it's not our role.

18 **Q.** Who is going to be interviewing subpostmasters?

19 **A.** So, potentially, the Contracts team.

20 **Q.** Even for a very significant loss?

21 **A.** If there's no suggestion of criminality, it won't come
22 to A&CI.

23 **Q.** If there is a suspicion of criminality, what happens?
24 You don't interview them or you do interview them?

25 **A.** We don't interview them.
52

- 1 **Q.** So they'll be interviewed by a tier below you that
2 doesn't have the training that your team is provided
3 with, because your team are the experts in
4 investigations, they'll be interviewed by somebody who
5 is not that top tier?
- 6 **A.** No. So as soon as a lower tier forms a suspicion, which
7 will not be based on -- well, it might be based on
8 something that's voluntarily offered during a -- and
9 saved to a call, to the call centre. So that's them
10 initiating contact. But my understanding is that
11 Tier 3, for example, do not speak to postmasters
12 particularly, so they won't be interviewing them.
- 13 **Q.** So you won't have a postmaster's account, necessarily --
- 14 **A.** No.
- 15 **Q.** -- and you will have to determine whether something is
16 going to be passed to the police, based on what?
- 17 **A.** So we'll have to -- so that's -- so all the alternative
18 explanations are considered in Tier 2 and 3.
- 19 **Q.** But a postmaster wouldn't have provided their
20 explanation?
- 21 **A.** Well, they may have volunteered information or
22 an account already but my understanding is that Tier 2
23 and 3 don't formally conduct an interview.
- 24 **Q.** Can you assist us with the tiers: what is Tier 1,
25 Tier 2, Tier 3?

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- 1 **Q.** But those are discussions, not interviews?
- 2 **A.** Yes.
- 3 **Q.** What determines the extent of an internal investigation
4 prior to reporting something to a law enforcement
5 agency?
- 6 **A.** I'm not aware that we've reported anything to law
7 enforcement relating to an internal investigation.
- 8 **Q.** How about the actions of a subpostmaster, an apparent
9 discrepancy, or something along those lines?
- 10 **A.** Okay, so we have had -- so none of our, I think it's 16,
11 cases that A&CI are currently working on that we've
12 reported to the police, none of those relate to a cash
13 shortfall.
- 14 **Q.** In those particular cases, how do you determine whether
15 to pass something to the police or not?
- 16 **A.** So there is often information provided by another
17 person -- another party. So, for example, we've
18 reported a matter to the police where the postmaster has
19 reported that a family member has run off with a bag of
20 cash -- a pouch, cash pouch. We've had issues where we
21 have taken a witness statement from a postmaster who was
22 subject to coercive behaviour from a partner that has
23 resulted in activity in the branch that has come to our
24 attention.

So we will seek to get that additional evidence and,

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- 1 **A.** I think Mel Park addressed that yesterday.
- 2 **Q.** Can you briefly address that?
- 3 **A.** So the vast majority of issues are, as I understand it
4 are dealt with at the call centre, and then the funnel
5 sort of narrows, the pyramid narrows. So those issues
6 that can't be resolved at that level are then escalated
7 to Tier 2. Most issues are dealt with there, and then
8 a much smaller subset are then passed to Tier 3, who are
9 very technically capable, and then they are the ones
10 that make referrals to us.
- 11 **Q.** Although the guidance that we're seeing here refers to
12 these various types of interviews, actually, we should
13 read into here somewhere that this only applies to
14 people directly employed by the Post Office or it
15 certainly doesn't apply to subpostmasters?
- 16 **A.** In the main, yes. So there are -- so there are a few
17 occasions where the Contracts Team do speak with
18 postmasters over potential contract breach issues, and
19 what the purpose of this is, for them, is we would like
20 them to apply the same concepts of fairness,
21 transparency, sensitivity and openness in those --
22 document keeping, recordkeeping, and that sort of thing,
23 that you would have in another situation, so that they
24 are treating the postmasters fairly in those
25 discussions.

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- 1 when reporting the matter that affects Post Office, we
2 would pass that information on as well, and that would
3 form part of our decision-making process to do it.
- 4 **Q.** Thank you. I'd just like to talk about two other
5 policies very briefly before we take our mid-morning
6 break. The first is the Financial Crime Policy of July
7 2023. Could that be brought up on screen, that's
8 POL00447947. This isn't your team's policy, is it,
9 I don't think?
- 10 **A.** No, it's not.
- 11 **Q.** In your statement, though, you have identified at
12 page 14 there was an error. If we could turn to
13 page 14, please. It's the bottom of that page in
14 respect of "Internal Financial Crime/Fraud". At the
15 bottom there, it says:
- 16 "Detective Controls:
17 "All reports received of or instances identified of
18 internal fraud will be fully investigated and where
19 appropriate, Post Office will prosecute individuals."
20 You've identified that as an error in that policy.
21 Are you aware of that having been amended since it has
22 been identified?
- 23 **A.** I know people were instructed to amend it. I don't know
24 whether they have.
- 25 **Q.** The final document that we'll go to before the break is

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1 the Subpostmaster Contract. That's POL00000254. So
 2 this is the Standard Postmasters' Contract. If we could
 3 turn please to page 71, this is an issue that's been
 4 identified and addressed with other witnesses, including
 5 Mr Read. We can see there that it refers, at the top of
 6 the page, to the "Investigation Division" and, if we
 7 scroll over the page, we can see, for example, it refers
 8 to "Enquiries by Officers of the Post Office
 9 Investigation Division". At point 12, it says:
 10 "... the Investigation Division does NOT enquire
 11 into matters where crime is not suspected."
 12 Is this it of date?
 13 **A.** Absolutely. So, if I may, it might assist.
 14 **Q.** Yes.
 15 **A.** In early August, I was asked by the lawyers who were
 16 reviewing Postmaster Contracts to come up with a new,
 17 better contract, fairer contract. I was asked to review
 18 sections of this and I've asked for all of this to be
 19 taken out.
 20 **Q.** Is it surprising, given the level of scrutiny that has
 21 been taking place for years now on Postmaster Contracts
 22 and on the policies and procedures of the Post Office,
 23 that that has remained in there for so long?
 24 **A.** I think I was very surprised it was there.
 25 **Q.** Who, in your view, is responsible for that?

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1 postmasters?
 2 **A.** It says in the new draft manual that we won't conduct
 3 interviews under caution. I'm not sure it goes down
 4 another level. I was thinking in the break perhaps we
 5 need to separate out in the investigation policy, so
 6 that we can be explicit as to what applies to
 7 a postmaster linked investigation conducted in Retail,
 8 for example, as opposed to inhouse -- Post Office
 9 Limited type people.
 10 **Q.** Has there been an explicit decision that Post Office
 11 will not interview postmasters?
 12 **A.** There has been a decision that my team will not
 13 interview postmasters, yes.
 14 **Q.** I think where we got to before the break was that the
 15 other teams wouldn't interview postmasters: they would
 16 have a discussion with them?
 17 **A.** Yes.
 18 **Q.** Are you aware of any overarching decision that no
 19 interviews will take place with postmasters?
 20 **A.** So my understanding of practice and policy within the
 21 retail space is that they do not do interviews.
 22 **SIR WYN WILLIAMS:** There may be a degree of difficulty, in
 23 practice, in deciding whether what is, in fact,
 24 happening amounts to an interview or a discussion,
 25 right? Forget interviews under caution, that's clear.

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1 **A.** I don't know who actually owns Postmaster Contracts, I'm
 2 afraid.
 3 **Q.** Would it have been your predecessor who would have
 4 inputted into that?
 5 **A.** I don't consider myself to have a predecessor but I take
 6 your point: do you mean the Head of Security?
 7 **Q.** Perhaps.
 8 **A.** Okay. I imagine they -- yes, partly. But I think
 9 Postmaster Contracts are likely to be owned in their
 10 totality in a different department.
 11 **MR BLAKE:** Okay. Thank you.
 12 Sir, that might be an appropriate moment to take our
 13 mid-morning break.
 14 **SIR WYN WILLIAMS:** Fine.
 15 **MR BLAKE:** Can we come back at 11.40, please?
 16 **SIR WYN WILLIAMS:** Okey doke.
 17 **MR BLAKE:** Thank you very much.
 18 (11.23 am)
 19 (A short break)
 20 (11.39 am)
 21 **MR BLAKE:** Thank you, sir.
 22 Mr Bartlett, just to revisit that issue we were just
 23 addressing before the break, does it say in the
 24 investigators manual or in any of those policies that
 25 we've looked at, that the Post Office won't interview

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1 There has to be a caution. I understand your evidence
 2 on that. But how is anyone to determine when
 3 a discussion becomes an interview, Mr Bartlett?
 4 You've got experience, I know, of both police and
 5 other regulators in respect of this. I mean, I'm
 6 familiar, obviously, with the situation in which
 7 an employee -- let's forget subpostmasters, to take the
 8 heat out of it -- has a discussion with an employer or
 9 is formally interviewed by an employer about various
 10 things. It's not an interview under caution, the
 11 employer isn't doing anything like that, but they are
 12 trying to get to the bottom of something, if I can put
 13 it in that way.
 14 **A.** Yes.
 15 **SIR WYN WILLIAMS:** In practice, how is the difference to be
 16 delineated?
 17 **A.** I think it's very difficult to draw a distinction,
 18 myself. It depends what definition of an interview that
 19 one would want to settle on. You know, is it
 20 a structured conversation with the objective of
 21 establishing facts or experience of a particular matter
 22 in hand? That could be one definition, in which case my
 23 view is that that will occur in the retail space but it
 24 depends on what they mean and what is meant.
 25 **SIR WYN WILLIAMS:** Yeah, I mean, let's take the example that

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1 I raised with you to understand the process in respect
 2 of involving outside investigators. When Ms Tutin was
 3 speaking with Mr Read, I would expect that most people
 4 would call that an interview, not a discussion.

5 **A.** I agree, sir.

6 **SIR WYN WILLIAMS:** Right. So, I'm only asking completely
 7 open-mindedly: is it possible, in a document like
 8 a manual or a policy, to actually lay down when
 9 a discussion becomes an interview or vice versa, for
 10 that matter?

11 **A.** It is very difficult, and I think there are a range of
 12 views as to when an interview is -- what an interview is
 13 and when it is occurring.

14 **SIR WYN WILLIAMS:** Yes, I think -- well, I have some
 15 sympathy with that, having seen various manifestations
 16 of all this over 50 years. Anyway.

17 I think the more important question for me is: can
 18 you foresee -- this is not about interviews under
 19 caution, all right, I understand what's going on about
 20 that -- but do you foresee any problem about there being
 21 the facility for investigators, whether part of your
 22 team or any other team, when appropriate, to interview
 23 someone?

24 **A.** I think, in any other organisation, no, sir, I wouldn't.
 25 In post office, because of the sensitivity of the past,

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1 **Q.** -- and then that filters down throughout the rest of the
 2 business and, by your assurance purpose, you ensure that
 3 the rest of the business essentially keeps to the kinds
 4 of standards that your department sets?

5 **A.** Yes.

6 **Q.** So is it not your responsibility and your department's
 7 responsibility to formulate the policy with respect to
 8 interviewing, or however you may call it,
 9 subpostmasters?

10 **A.** I think we would play a central part in that,
 11 absolutely, but it needs to be a collegiate approach
 12 because a lot of the staff that would need to do that
 13 would not be within my team and I know that they would
 14 be uncomfortable in some situations in doing that. So
 15 I think it's something I can take away and discuss.

16 **Q.** The Investigator's Manual is a manual that your team is
 17 responsible for; is that right?

18 **A.** Yes.

19 **Q.** The Group Investigations and Cooperation with Law
 20 Enforcement Policy, the new policy, again, that is
 21 something that your team are responsible for?

22 **A.** For drafting, yes.

23 **Q.** So wouldn't your team be responsible, ultimately,
 24 however much consultation you carry out amongst other
 25 teams, for a policy that addresses what to do in

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1 which I completely understand --

2 **SIR WYN WILLIAMS:** So what we're really grappling with is
 3 the fact that, because of the history, people are very
 4 sensitive about what might be regard as oppressive
 5 interviews. That's the reality of it, is it not? So
 6 they're trying to do everything they can to avoid it?

7 **A.** Yes, and I think it's something that the people who
 8 would be spoken with would like to avoid and are
 9 cautious about --

10 **SIR WYN WILLIAMS:** Sure.

11 **A.** -- participating in but, absolutely within Post Office,
 12 there is huge nervousness about those sort of
 13 conversations happening.

14 **SIR WYN WILLIAMS:** Fine. Thank you.

15 Sorry, Mr Blake.

16 **MR BLAKE:** No, it's been helpful, sir.

17 Can I just follow on, just to establish who is
 18 responsible at the Post Office for formulating
 19 an overarching policy that addresses that issue?

20 **A.** I think it would need to be a combination of different
 21 teams.

22 **Q.** The way I understood your witness statement and your
 23 evidence was that your department, A&CI, essentially
 24 sets the overarching POC for investigations --

25 **A.** Mm-hm.

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1 circumstances where a postmaster, or their assistant, is
 2 being interviewed?

3 **A.** Yes, once that policy is formulated and approved, then
 4 yes, we would.

5 **Q.** Can you assist us with why such a policy is not yet in
 6 place?

7 **A.** Because of the sensitivities -- sorry, that particular
 8 element of the policy or the policy generally?

9 **Q.** Why there isn't a policy that sets out, for example,
 10 what to do if, during an interview or a discussion, you
 11 suspect somebody of criminality? Where does someone
 12 turn to in the business, in the Retail Team, in the
 13 Contracts team, where do they turn to to answer that
 14 question?

15 **A.** They would contact our team.

16 **Q.** Your team currently doesn't have a policy. Why doesn't
 17 it have a policy?

18 **A.** Because the landscape is constantly changing.

19 **Q.** What does that mean?

20 **A.** In terms of the expectation or appetite within the Post
 21 Office for investigations, it's not been yet nailed down
 22 to my satisfaction. There's also --

23 **Q.** Isn't this is an absolute perfect example of that fear
 24 to take things forward in the business because things
 25 are going to be sensitive forever, if you let them?

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1 A. No, I would agree with that.
 2 Q. Can you assist the Chair with when such a policy might
 3 be implemented?
 4 A. Not with a specific date, no, because I'd need to go --
 5 we'd need to go back and consult with other departments,
 6 get their input, run it through the approvals process,
 7 there. It will absolutely --
 8 Q. There's consultation, consultation, approvals processes
 9 in all of these policies. We're years down the line
 10 now.
 11 A. Yes.
 12 Q. Can you say to the Chair when you anticipate that those
 13 various consultations will have developed a policy that
 14 relates to the interviewing of postmasters?
 15 A. I can't say for certainty because I can't control that
 16 but my ambition would be that we would have it done,
 17 perhaps by the end of the calendar year or the financial
 18 year.
 19 Q. Which calendar year?
 20 A. This calendar year.
 21 Q. I'd like to move on then to liaison with law
 22 enforcement. The Post Office formally ceased private
 23 prosecutions on 22 September 2020; is that right?
 24 A. Formally, yes.
 25 Q. I think you've said that they, essentially, didn't have

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1 shows?
 2 A. I think it shows that issues are being resolved in the
 3 Retail Teams now on a more equal, collegiate and open
 4 basis, through the process Mel Park oversees, that
 5 perhaps in the past went straight to a criminal
 6 investigation.
 7 Q. Do you think that those matters are being resolved
 8 through Mel Park's team?
 9 A. Yes.
 10 Q. Do you know how many prosecutions have actually taken
 11 place, not just reported to the police, but actually
 12 taken place, either in respect of that particular time
 13 period or in respect of any time period that you're able
 14 to assist us with?
 15 A. From matters that we've reported?
 16 Q. Yes.
 17 A. None.
 18 Q. None. So there have been 25 reported to the police --
 19 A. *(The witness nodded)*
 20 Q. -- none have actually reached the prosecution stage?
 21 A. Not yet.
 22 Q. Do you anticipate that a high proportion or a low
 23 proportion of those 25 will reach that stage?
 24 A. I don't think it -- that I'm able to comment on that
 25 because I don't know what evidence the police have.

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1 a criminal trial for fraud, theft or false accounting
 2 after the Second Sight Report, so after 8 July 2013,
 3 subject to, I think you've said, there's a caveat in
 4 your witness statement, that addresses an instance in
 5 2015?
 6 A. That's correct.
 7 Q. You've provided some data in your statement,
 8 paragraph 89 onwards. There are lots of caveats in the
 9 figures that you have provided but, broadly speaking,
 10 you have set out that there have been in the region of
 11 328 investigations into alleged fraud, theft or false
 12 accounting since 8 July 2013; is that correct?
 13 A. Yes, so I believe it was 301 were done in the old
 14 Security Team, whilst they thought that they were
 15 waiting for the business to continue, as they saw it.
 16 Q. So a much smaller figure that has been carried out under
 17 your team?
 18 A. Correct.
 19 Q. You say that there have been in the region of 25 that
 20 have been reported to the police in that period; is that
 21 correct?
 22 A. That was correct to the time of writing the statement,
 23 yes. I'm sure that may have changed since writing the
 24 statement.
 25 Q. What do you consider the difference in those figures

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1 Q. But I mean, those 25 go back to 2013, some of them,
 2 presumably --
 3 A. Not the ones we've reported.
 4 Q. Sorry, can you assist us, how many have you reported
 5 since your team has been in place?
 6 A. I think that's the 25 figure but I would need to check.
 7 Q. Okay.
 8 **SIR WYN WILLIAMS:** Well, I'm sorry to interrupt again but am
 9 I right in thinking that these 25 cases are the ones
 10 that are summarised in your appendix -- I'm calling at
 11 that -- from page 105 onwards?
 12 A. It's included in the appendix, sir, yes, I think with
 13 summary of others.
 14 **SIR WYN WILLIAMS:** So we've actually got, at the end of
 15 that, the last column of that analysis tells us if
 16 there's been a closure date, in other words the case is
 17 over one way or another, or whether it's ongoing? As
 18 far as you're aware, is that still essentially the
 19 picture or has it changed from the time you produced
 20 your witness statement?
 21 A. I think it's broadly the same, sir.
 22 **SIR WYN WILLIAMS:** Yeah, okay.
 23 **MR BLAKE:** Thank you.
 24 I'd like to look at a number of Group Executive
 25 Report decisions and Board decisions that relate to the

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1 issue of placing with law enforcement. Can we please
2 turn to POL00447975. We start on 20 April 2022 and
3 that's a Group Executive Report, you're listed there as
4 one of the authors of this report, and it sets out the
5 background to the establishment of what was then the
6 Central Investigations Unit, the CIU. If we scroll
7 down, we can see it says:

8 "Following detailed assessment, KPMG concluded in
9 their report of August 2021 that Post Office should
10 create a Central Investigations Unit. The introduction
11 of the CIU was to ensure [Post Office-wide]
12 investigations would be properly planned, resourced,
13 documented, and executed; with lessons learnt fed back
14 into the business. KPMG also recommended a target
15 operating model.

16 "Post Office decided to form a CIU and the Head of
17 CIU was appointed on 21 February 2022."

18 That's you?

19 **A.** Correct.

20 **Q.** "We are seeking approval to recruit the rest of CIU in
21 line with KPMG's recommendations", and it sets out there
22 what was required at that point in time.

23 Paragraph 4 says:

24 "All observations made by KPMG are considered as
25 being met or [adopted] in this proposal which is as

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1 So when I say "in part", I mean, it hasn't landed as
2 a branch, if you like, but the assurance and consistency
3 of approach methodologies has.

4 **Q.** Thank you. So I don't know, what does the word
5 "virtual" even mean?

6 **A.** Well, certainly not in the same management chain. So as
7 opposed to a single chain of command with different
8 teams reporting in to us, into the same hierarchy and
9 up, what the virtual side is, for example, in Mel Park's
10 team, she has several team leaders that report into her
11 and she reports into someone different, to who I report
12 to. So that's why it would be virtual.

13 **Q.** Thank you. If we scroll down:

14 "Business-based, decentralised teams conduct the
15 highest volume and lowest risk casework with the CIU
16 conducting the higher risk or more complex
17 investigations."

18 That's accurate, is it?

19 **A.** It is.

20 **Q.** If we scroll down, it says there, the penultimate bullet
21 point:

22 "An alternative to private prosecutions is proposed
23 to permit criminality evidenced by Post Office
24 Investigators to be progressed in all four nations of
25 the UK in order to act as a deterrent and to seek

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1 follows:

2 "A virtual Post Office Investigations Branch
3 develops a one-team approach to Post Office
4 investigations, ensuring the application of best
5 practice across the organisation."

6 Is that in place?

7 **A.** Partially.

8 **Q.** I mean, we spoke earlier of something overarching that
9 ensures the consistency of all of the investigations;
10 was that the aim of that?

11 **A.** Yes, it was.

12 **Q.** When you say "partially", why partially?

13 **A.** I --

14 **Q.** If we scroll up, sorry.

15 **A.** That's okay. The intent at the time was perhaps to have
16 a more -- so to help to embed practice approaches, it's
17 always good for different teams to have the same purpose
18 and to relate well to each other and to understand the
19 positions and that was the idea of a virtual scheme.

20 The business prefers a linear approach, which is
21 stuff -- reports come into the call centre, they go
22 through the process of Tier 1, Tier 2, Tier 3, and come
23 to us, and I think there was not the appetite within the
24 organisation to have something called an Investigations
25 Branch because of the history of the organisation.

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1 financial recoveries."

2 Can you assist us with what that means?

3 **A.** Where we have suspicion that a criminal offence may have
4 occurred and harm may have been caused to the Post
5 Office because of that suspected criminal conduct, we
6 should report it to the police.

7 **Q.** Thank you. "Seeking financial recoveries", this is
8 a term or similar words are used in a number of other
9 documents. To what extent is it necessary, in your
10 view, to use the criminal justice system to seek
11 financial recoveries, as opposed to, for example,
12 a civil claim?

13 **A.** I'm not sure I understand the question, sorry.

14 **Q.** We'll see in a number of places that there's reference
15 to criminal prosecutions, passing matters to the police,
16 in order, amongst other things, to recovery money. Is
17 it your view that the criminal justice system is the
18 appropriate place to recovery money, and is it seen as
19 more helpful than, for example, civil proceedings?

20 **A.** Oh, okay. So to be very clear, the purpose of engaging
21 with the criminal justice system is not to recover
22 funds. That's not the overriding purpose but it is
23 an output of the criminal justice system for any
24 individual or organisation. So it wouldn't be to engage
25 law enforcement in order to recover funds. In fact,

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1 I believe I've said that in a SEG meeting and asked for
2 it to be minuted.

3 **Q.** I think we'll come to that.

4 **A.** Okay. But it is a potential output. The reality of
5 that producing much is low.

6 **Q.** Can you assist us, the authors are listed as yourself
7 and Sarah Gray. Did you draft different parts or are
8 you ultimately responsible for ...

9 **A.** No, I did the initial draft and then Sarah reviewed it
10 and made amendments that we agreed.

11 **Q.** Thank you. If we stay then on this page and if we
12 scroll down, I'd just like to ask you about the bullet
13 point on this page. In this it's bullet point 5, we'll
14 see it appears elsewhere as well. It says:

15 "The Post Office Investigations Branch was the first
16 recognised investigation unit in the world dating back
17 to near the foundation of the Post Office itself. It
18 has an unblemished reputation."

19 It gives its motto:

20 "... Gentle in Manner, Resolute in Deed, which is
21 very much in keeping with the intended approach of the
22 new investigation function."

23 Did you draft that?

24 **A.** I did.

25 **Q.** Can you assist us with why it's thought that the

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1 sought from the Group Executive here is to approve, for
2 onward distribution to the Board, the following three
3 things: first that the Post Office, Post Office staff,
4 postmasters and postmasters' staff, all being within the
5 remit of the Post Office Investigation Branch. But, as
6 you say, that didn't happen, or there was no
7 investigations branch?

8 **A.** No.

9 **Q.** "CIU to conduct criminal investigations", so that's your
10 team?

11 **A.** Yes.

12 **Q.** "Mobilising a new partnership model with the relevant
13 bodies across the UK to facilitate the investigation and
14 referral of suspected criminal misconduct."

15 If we scroll down, the "Executive Summary" is that:

16 "CIU will be staffed from September 2022 and full
17 operational by January 2023."

18 There's the proposal, halfway down, that the
19 Investigation Branch remit includes Post Office and Post
20 Office staff, postmasters, and postmasters' staff for
21 a range of matters, based on employment, ownership of
22 property and practical factors.

23 Although the Investigations Branch doesn't exist, do
24 you see your own team's remit as including all of those?

25 **A.** Yes, but also the Retail Team.

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1 Investigations Branch has an unblemished reputation?

2 **A.** Because that applied in principally -- no, I'll rephrase
3 that. The security and investigation -- or the Security
4 Investigations Team that are responsible for the scandal
5 was not what I was referring to. Here, I was referring
6 to earlier, much earlier, iterations of an investigative
7 capability within the Post Office.

8 **Q.** Because, plainly, the Investigations Team that was part
9 of the Security Team was involved in matters that the
10 Inquiry has been investigating?

11 **A.** Absolutely.

12 **Q.** It's not, presumably, your view that they have
13 an unblemished reputation?

14 **A.** The opposite.

15 **Q.** We're going to move on slightly in time. Can we please
16 look at POL00448354. This is a Group Executive report
17 of 6 July 2022. Am I right to say they have quite
18 similar wording all of these reports but they did go
19 separately to the Group Executive?

20 The one we just looked at was April 2022. We're now
21 in July 2022.

22 **A.** Mm-hm.

23 **Q.** The proposals are changing slightly; is that right?

24 **A.** Yes.

25 **Q.** If we scroll down, we can see that the input that is

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1 **Q.** As in both of you have responsibility or the remit of
2 both your team and the Retail Team includes those
3 individuals?

4 **A.** Correct.

5 **Q.** Thank you:

6 "Post Office has no appetite to pursue private
7 prosecutions. However, it is proposed that Post Office
8 Investigators conduct investigations into suspected
9 criminality and to report what has been evidenced to law
10 enforcement and prosecutors in all four nations of the
11 UK. The rationale being to act as a deterrent and to
12 seek financial restitution through the independent and
13 external criminal justice system."

14 Again there, slightly different wording, but there's
15 the reference there to "acting as a deterrent and
16 seeking financial restitution".

17 Do you have a view as to whether too much emphasis
18 is being placed on financial restitution through the
19 criminal justice system?

20 **A.** Too much emphasis in regards to in the document?

21 **Q.** Yes.

22 **A.** Um --

23 **Q.** In this document and similar documents?

24 **A.** No, because I think court enabled confiscation and
25 compensation is part of -- is an established part,

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1 an accepted part, of the criminal justice system, and so
 2 maybe an output from one of the CPS or whoever are
 3 prosecuting --
 4 **Q.** Yes.
 5 **A.** -- and a court finding of guilt.
 6 **Q.** As a former police officer, do you think that you might
 7 put too much emphasis on the criminal justice system as
 8 being used as a root for, for example, financial
 9 restitution, as opposed to non-criminal courts?
 10 **A.** No, because I have been out of the police longer than
 11 I was in the police. So my last law enforcement
 12 experience was 17 years ago. So I have had a variety of
 13 non-law enforcement roles since then.
 14 **Q.** Have your other roles involved the criminal justice
 15 system?
 16 **A.** Sometimes but not always.
 17 **Q.** Do you think that your focus might be too much on the
 18 criminal justice system as a mechanism to obtain
 19 financial restitution.
 20 **A.** My commentary and connection to law enforcement is not,
 21 again, restitution.
 22 **Q.** Can we scroll down, please, to page 2. At 1.2, it seems
 23 there that the Group Executive agreed on 20 April 2022
 24 to the forming of that virtual Post Office
 25 Investigations branch.

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1 Office] funds have been misappropriated ... and where we
 2 seek only a commercial outcome to these events. For
 3 example, where evidence obtained via an investigation
 4 supports a suspicion of someone having defrauded [the
 5 Post Office], they should be reported to the police
 6 irrespective as to whether or not the loss has been made
 7 good so that a credible deterrence may be established.
 8 Existing policies facilitates the reporting to police
 9 but not the preceding internal investigation. This
 10 paper seeks the [Group Executive's] approval for CIU
 11 staff to conduct criminal investigations within the IB's
 12 remit and report these matters to police when
 13 appropriate and in accordance with the CLEP."

14 It then sets out the operating model. It says:

15 "As a government organisation, Post Office is viewed
 16 by law enforcement differently from a privately owned
 17 company. It is unfortunately fact that LEAs
 18 deprioritise most reports of crime made by
 19 government-linked organisations if made in the
 20 traditional way."

21 Can you assist us with that?

22 **A.** Yes, my experience outside of the Post Office, as well
 23 as within, is that police forces will prioritise the
 24 allocation of resources, investigative resource, to
 25 general members of the public first, which I think is

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1 **A.** *(The witness nodded)*
 2 **Q.** So what happened that meant that that didn't, actually,
 3 ultimately take place?
 4 **A.** As the various phases of the Inquiry progressed, members
 5 of the GE became increasingly sensitive -- and I don't
 6 mean that pejoratively, I just mean that they were
 7 generally more sensitive -- to the use of language, and
 8 so support for labelling, naming and acting, as
 9 a collective function -- across functions lost its
 10 appeal.
 11 **Q.** You mentioned earlier parity with the Retail Team in
 12 certain respects, in terms of investigation functions.
 13 Is a risk that, now that that doesn't exist, that that
 14 overarching oversight has been lost in some way?
 15 **A.** No, I think the insurance work that we conduct is the
 16 practical measure of that.
 17 **Q.** Could we please turn over to page 5. Page 5 has
 18 a heading "Operating Model -- Criminal Investigations".
 19 I'd just like to take you through a few passages from
 20 that. If we scroll down to 3.4:
 21 "As a wholly government-owned corporation in receipt
 22 of government funds, it may be viewed that we have
 23 a duty to investigate as well as report suspected
 24 criminal events to the relevant authority. We may be
 25 criticised for not doing so, particularly where [Post

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1 correct. Then there's a sort of hierarchy,
 2 unofficially, of who is assisted, and government-owned
 3 institutions come forwards the bottom of that list. And
 4 so sometimes there is a struggle for law enforcement to
 5 adopt honestly-held and submitted reports of crime.

6 **Q.** Has that been your recent experience with the police?

7 **A.** Yes.

8 **Q.** It says:

9 "There is an expectation that a degree of
 10 self-sufficiency exists. Without recourse to private
 11 prosecutions an alternative is required if the interests
 12 of Post Office, postmasters, our staff, our shareholder,
 13 and the public are to be protected."

14 Then it makes the proposal. It says:

15 "Suspected offences with an element of criminal
 16 dishonesty would form the vast majority, if not all, of
 17 our criminal investigations and potential referrals.
 18 This would include theft, fraud of all types, and money
 19 laundering. These types of offences are those which
 20 most LEAs do not have sufficient, nor sufficiently
 21 skilled, resource allocated, and which are lengthy to
 22 investigate, often resulting in them not being
 23 prioritised. If we do not investigate these matters
 24 prior to referral then the likelihood of preventing the
 25 loss of public money significantly diminishes, as does

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1 any deterrence factor.
 2 "Jurisdiction is also relevant. Typically,
 3 authorities in Scotland are less inclined to adopt
 4 evidence collected by non-LEA investigators. England
 5 and Wales LEAs expect an almost complete case in an
 6 admissible format and Northern Ireland is likely to be
 7 somewhere between the two."

8 Just pausing there, if the policy is to not
 9 interview postmasters or their assistants, how can there
 10 be sufficient information to meet that almost complete
 11 case?

12 **A.** It can't, which is -- this is an example of how the
 13 environment has changed since I started in the Post
 14 Office and the appetite of the Post Office.

15 **Q.** So is it your view -- and I don't want to put words in
 16 your mouth, please do answer exactly in your own
 17 words -- that the not interviewing of postmasters is
 18 going to significantly limit the ability to take matters
 19 forward in the criminal courts?

20 **A.** I think it makes it more difficult for the police to
 21 adopt an investigation. I don't think it -- and then it
 22 would sit with them. So for them to use the
 23 investigative tools that they have, that we don't and
 24 shouldn't have, as a corporate, they need a basis in
 25 which to open an investigation, and it would be easier

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1 get to that point, [Post Office] will need to collect
 2 admissible evidence to assist over-stretched LEAs and
 3 that requires competent, evidence-led, ethical
 4 investigators."

5 Can you assist us with the current position insofar
 6 as that's concerned: has there been, for example,
 7 a letter sent to the City of London Police Economic
 8 Crime Team?

9 **A.** A letter was sent to the Chief Constable -- sorry, the
 10 Commissioner of the City of London Police, and there is
 11 no dedicated team within the City of London Police, but
 12 they have agreed -- because they also are lead force for
 13 fraud and they oversee the fraud reporting position for
 14 the country -- well, for England and Wales -- they have
 15 undertaken to look at cases had come through Action
 16 Fraud that we report. That's the extent of that.

17 **Q.** Well, one proposal is contribution from the Post Office
 18 to the cost of police investigations.

19 **A.** No, those discussions haven't taken place.

20 **Q.** Scotland, Northern Ireland have --

21 **A.** So Northern Ireland, we're hopefully about to sign
 22 an MOU with them, in terms of a single reporting point
 23 for Post Office. That's not an undertaking by PSNI that
 24 they will investigate everything we tell them or report
 25 to them at all but it establishes a pipeline for Post

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1 for them to do that if an interview, for example, or
 2 other techniques have been used to gather evidence that
 3 they can consider.

4 **Q.** "England and Wales", it says the proposal is for:

5 "A CEO letter to [what's now the Department for
 6 Business], and then on with a Minister's endorsement
 7 requests assistance from the Commissioner of the City of
 8 London Police's Economic Crime Directorate ... to work
 9 in partnership with the CIU to investigate and then
 10 refer to the Crown Prosecution Service all strong cases
 11 of dishonesty-based offences above a certain level of
 12 complexity or monetary loss;

13 "A dedicated team to be formed within [the City of
 14 London Police Economic Crime Department] ...

15 "Post Office or [the Department for Business] may be
 16 asked to contribute to the cost of this team."

17 Then there are also similar proposals for Scotland
 18 and Northern Ireland.

19 Paragraph 4.7 says:

20 "By seeking partnership working in this way, [Post
 21 Office] demonstrates that we do not operate as victim,
 22 investigator and prosecutor. Conceptually, the police
 23 and the prosecutors will decide on the strength of
 24 evidence [that] they will (or will not) progress through
 25 the criminal justice system, not [the Post Office]. To

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1 Office to go to a single point of contact.

2 In Scotland, we have a good, informal working
 3 relationship with the Economic Crime Unit there but,
 4 again, that's just so we have a single referral point
 5 into someone that understand the issues that we're
 6 dealing with. It doesn't affect their independence as
 7 an investigator, and it doesn't guarantee that those
 8 matters would be adopted as an investigation.

9 **Q.** Thank you. Can we please turn to POL00448321. This is
 10 a meeting of the Group Executive, "[Group Executive]
 11 Tactical Meeting", 3 August 2022. We can see matters
 12 being discussed over the page, please. It says,
 13 "Investigations, Sarah Gray and John Bartlett"; did you
 14 attend this meeting?

15 **A.** Yes, it looks that way. I don't remember it
 16 particularly but it says I attended.

17 **Q.** Let's have a look from the third bullet point down, if
 18 we could scroll down, slightly:

19 "SG [Sarah Gray] outlined the 3 approvals requested
 20 from the [Group Executive]. The remit in terms of the
 21 applicability of the CIU branch was not controversial.

22 The part that was more controversial was the proposal in
 23 relation to the CIU conducting criminal investigations.

24 To be clear, we were not looking for the CIU to
 25 undertake criminal prosecutions; we were proposing that

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1 the CIU undertook criminal investigations before
2 referring. In terms of why we wanted to do this -- we
3 were a cash business and £2.5 million had been
4 identified as potentially being recoverable ..."

5 Do you know how that figure was arrived at?

6 **A.** I don't think that's correct. So it is -- I believe at
7 the time it was true that the apparent value of loss to
8 Post Office of the potential criminal matters that were
9 afoot totalled 2.5 million but it absolutely would not
10 be recoverable.

11 **Q.** Do you have an idea of what that current figure might
12 look like?

13 **A.** So -- well, if you take it as not what could be
14 recovered but the total value of potential loss, is
15 about 3.6 million.

16 **Q.** Thank you. If we scroll down:

17 "NR [Mr Read] queried whether the culture was that
18 people were back footed due to the situation over the
19 last 3 years. [Ms Gray] replied that whilst the vast
20 majority of [postmasters] were decent honest reliable
21 people, in any big group there would be people who
22 looked to take advantage of loopholes and there was
23 knowledge that there would be no deterrent. This was
24 incredibly disheartening for police who undertook the
25 investigations then saw the work go nowhere."

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1 that it may be suggested that you were perhaps too
2 focused on the criminal aspect rather than the civil
3 aspect, but that's something that you don't agree with
4 there?

5 **A.** So that was a discussion about the Proceeds of Crime Act
6 and recovery through the courts.

7 **Q.** Yes.

8 **A.** So that's what the discussion was about.

9 **Q.** But Mr Mladenov suggested, for example, that civil
10 recovery could be the root to recover losses.

11 **A.** He did, yes.

12 **Q.** The focus from you seems to be on the Proceeds of Crime
13 Act; what's your view on that?

14 **A.** Because the discussion was around court cases and the
15 recovery -- sorry, criminal court matters, and so that
16 was the focus of the conversation.

17 **Q.** Do you think there's been sufficient thought given
18 within the business to actually using the civil courts
19 to recovery money that's owed to the Post Office?

20 **A.** I believe papers have been taken to SEG in relation to
21 civil recovery.

22 **Q.** Yes, and what role do you see you having in that?

23 **A.** I think, as mentioned earlier, we might assure the
24 evidence collection and testing of that evidence.

25 **Q.** What is your view as to whether civil recovery, or using

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1 Is that something that you had been experiencing?

2 **A.** No, I think that relates to the Retail Team.

3 **Q.** Thank you:

4 "[Ms Gray] referenced the legal duty the Company has
5 as an organisation in receipt of public funds to
6 investigate and then refer suspected criminal conduct;
7 we were not currently completely fulfilling this duty
8 ..."

9 Then it goes on to you. It says that:

10 "[You] noted [Post Office's] ownership structure and
11 shared [your] view that we needed to be doing more when
12 it came to criminal investigations; we could provide
13 evidence to law enforcers and prosecutors to assist them
14 ..."

15 Then this is Mr Mladenov:

16 "... noted that we could still recover losses via
17 civil recovery. [You] agreed that civil recovery
18 remained open to us, or we could pursue under the
19 Proceeds of Crime Act, so we could ask law enforcement
20 to ask the court for the criminal proceeds to be repaid
21 to us. We would also assert that we were asserting the
22 rights of [postmasters] when [postmasters] staff stole
23 from them, so Proceeds of Crime Act was likely the best
24 way to recovery monies ..."

25 This touches again on the same point I made before:

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1 the criminal courts and the Proceeds of Crime Act would
2 be more appropriate as a general policy?

3 **A.** That's a difficult one, it depends on what perspective
4 you come from, I think. So, for example, if I was
5 a postmaster or postmaster's assistant, and I was told
6 that Post Office wanted to take me through a civil
7 recovery process I would be worried, the reason --
8 because history. And the reason being, I feel that, is
9 that there would be no independent assessor of evidence
10 between the Post Office and that material being
11 introduced into a civil court.

12 **Q.** So, in essence, a civil process is adversarial --

13 **A.** (*The witness nodded*)

14 **Q.** -- whereas a criminal process you have the level of the
15 police involvement as well?

16 **A.** And a prosecutor so it's two additional levels.

17 **Q.** Thank you. We see there at the bottom, if we could
18 scroll down, please:

19 "SG [Ms Gray] noted that after encouraging a culture
20 of speak up, we had seen allegations increase of fraud,
21 theft or nebulous financial crime. NR asked for more
22 detail and also asked who was making the complaints.
23 [You] advised that [postmaster] staff were reporting
24 more than [postmasters]."

25 So have you seen an increase in the postmaster staff

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1 reporting crime?
 2 **A.** We did at that time. It was the predominant category of
 3 reporting through the Speak Up service at that time. It
 4 isn't now. That's changed. But, at that time, that was
 5 the case.
 6 **Q.** What is it now?
 7 **A.** Behaviours at senior level.
 8 **Q.** What do you mean by that, sorry?
 9 **A.** So people at -- the predominant or a high number of
 10 reports through the Speak Up line, at the moment, are
 11 commenting or reporting poor behaviours at Head of
 12 Department level or SEG level.
 13 **Q.** Without going into any specific detail of specific
 14 complaints can you give us a flavour of what those focus
 15 on?
 16 **A.** They are often around bullying, harassment -- sorry, not
 17 harassment. Bullying, poor conduct, matters that would
 18 normally be -- that would be dealt with in an ER
 19 context.
 20 **Q.** Thank you. The final bullet point there:
 21 "In AC's [I think that's Mr Cameron] absence,
 22 [Ms Gray] raised his concern regarding the reliability
 23 of evidence whilst we remained on Horizon. [You]
 24 replied that you could choose which data we relied on
 25 and we would use the most reliable data. [You]

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1 where we proceeded and handed over to law enforcement
 2 and prosecutors, it would be on the basis of having
 3 conducted sound and thorough investigations ..."
 4 If we scroll over the page, please. Thank you:
 5 "[You] advised that you had spoken with public
 6 prosecutors service, and they were willing to work with
 7 us. What we wanted to achieve was a strategic
 8 relationship as it would be the same officers who dealt
 9 with the cases."
 10 Is that what we saw earlier?
 11 **A.** That is -- what is missing from there is the Northern
 12 Ireland Public Prosecutions Office.
 13 **Q.** Ah, so that was specific to Northern Ireland, was it?
 14 **A.** Yes.
 15 **Q.** "[Mr Foat] noted that it was important to emphasise that
 16 the case assessment, decision and conclusion would be
 17 performed by the external prosecutor. Post Office had
 18 a legal and a moral obligation to provide the
 19 information of suspected criminal misconduct to law
 20 enforcement and there was a public narrative that
 21 supported that approach.
 22 "[The Group Executive] RESOLVED to APPROVE for
 23 onward forwarding to the Board for noting:
 24 "[Post Office], [Post Office] staff, postmasters and
 25 postmasters' staff all being within the remit of the

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1 furthered advised that in speaking to MR, MR's team ..."
 2 That's Mr Roberts, is it, Martin Roberts?
 3 **A.** Probably.
 4 **Q.** Sorry:
 5 "... MR's team were not seeing any inherently
 6 unreliable data."
 7 Just pausing there, in this phase we've heard some
 8 criticism of Mr Roberts: Karen McEwan was critical of
 9 his abilities; the Subpostmaster Non-Executive Directors
 10 also raised concerns about Mr Roberts. Did you have
 11 concerns or do you have concerns about Mr Roberts'
 12 abilities.
 13 **A.** I didn't interact very often with Martin Roberts so
 14 I haven't seen a range. I certainly wouldn't know
 15 anything about his performance.
 16 **Q.** Do you know how he could have formed the view that they
 17 were not seeing any inherently unreliable data; what was
 18 your understanding at that time?
 19 **A.** So that's through the application of the process in the
 20 Retail Teams, where they look for what bugs, errors,
 21 defects, calls to the helpline, existed around those
 22 particular transactions that they were looking at.
 23 **Q.** So they look at helpline data?
 24 **A.** I believe so.
 25 **Q.** "NR noted that whilst he took [Mr Cameron's] point,

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1 Post Office Investigation Branch;
 2 "CIU to conduct criminal investigations; and
 3 "The Mobilising of a new partnership model with the
 4 relevant bodies across the UK to facilitate the
 5 investigation and referral of suspected criminal
 6 misconduct."
 7 Are you able to assist us with why the Group
 8 Executive approved that to the Board for noting, rather
 9 than for active discussion at Board level?
 10 **A.** No, I can't.
 11 **Q.** Can we please turn to POL00448320. So that was August
 12 2022. By 27 September 2022, we have a Board report. Is
 13 that the report that followed those discussions at Group
 14 Executive level?
 15 **A.** Presumably.
 16 **Q.** We have you there as the author, alongside Sarah Gray.
 17 It says, "The Board is asked to note", and that's
 18 exactly as we saw it in the previous document.
 19 If we scroll down, we can see the recommendations in
 20 terms of the operating model at page 6 and 7 remain the
 21 same and you've explained the ultimate decision that was
 22 taken in respect of progressing that matter?
 23 **A.** Yes.
 24 **Q.** Can we please turn to POL00448327. We're back at Group
 25 Executive level now, we're now in 2023, 28 June 2023, so

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1 this is nine months later, and you are reporting to the
2 Group Executive in respect of prioritisation and
3 resourcing of your department; is that correct?

4 **A.** Yes.

5 **Q.** It says there:

6 "The [Group Executive] is asked to agree the
7 priorities for CIU for the next two financial years ..."

8 So that takes us into now.

9 **A.** Yes.

10 **Q.** "... and approve the additional funding recommended
11 below necessary to service the current and projected
12 investigations within these priorities."

13 So by this stage you'd been given approval to carry
14 out investigations into criminal matters; is that
15 correct?

16 **A.** Correct.

17 **Q.** If we scroll down, please. We can see a section over
18 the page on "Prioritisation". It says:

19 "[The Post Office] requires a business as usual
20 central investigation function which is resourced to
21 deliver quality investigations in priority areas at
22 an appropriate scale and to assure the investigative
23 capabilities of the Dispute Resolution, Network
24 Monitoring & Reconciliation, and Contracts teams.
25 Financial Crime, Data Protection & Information Rights,

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1 **Q.** If we scroll down, I'd just like to read to you from
2 paragraph 6:

3 "The intention to conduct a full network count of
4 stock and cash prior to rolling branches on to NBIT will
5 reasonably generate significant numbers of criminal
6 investigations. CIU will be required to play its part
7 in managing this investigative demand. CIU is not
8 staffed to meet current requirements and certainly not
9 a short to medium-term increase caused by the move to
10 NBIT. The rollout of NBIT will almost certainly
11 generate significant case work for CIU during the
12 all-branch audit phase."

13 This is something we have heard some evidence on, so
14 the idea is that, once NBIT is up and running, all
15 branches are audited?

16 **A.** Yes, I think the idea is so it's a fresh start on a new
17 system.

18 **Q.** "Whilst this is difficult to precisely anticipate, if
19 only 1% of branches are found to have issues that need
20 potential criminal investigations to resolve shortfalls
21 or stock issues then a potential [circa] 115 new cases
22 will result."

23 So is it still your anticipation that when the move
24 is undertaken to the new system, NBIT, that there will
25 be a significant number of new criminal cases?

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1 and ER investigation teams could also be assured in this
2 way in the future.

3 "[The Post Office] also needs the central function
4 to be able to flex in a way that allows it to deliver
5 [investigations required] outside of, and in addition
6 to, business as usual.

7 "[The department] is not currently resourced to
8 deliver these demands."

9 Can you assist us with that; what was meant by "not
10 currently resourced"?

11 **A.** We were being asked more than we had capacity to do.

12 **Q.** Is that capacity in respect of funding, in respect of
13 manpower or something else?

14 **A.** Predominantly staffing.

15 **Q.** We'll get to, in due course, how things developed but
16 was this approved?

17 **A.** Not entirely.

18 **Q.** In terms of additional resourcing, was sufficient
19 resourcing provided?

20 **A.** No.

21 **Q.** Why not, in your view?

22 **A.** Because the Post Office has limited budget, it has to
23 make difficult funding decisions and, on this occasion,
24 it was decided that this -- that there were other
25 priorities.

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1 **A.** I think it depends what NBIT -- what the new system
2 entails and what it looks like. So is it going to be
3 a direct replacement or is it going to be a different
4 thing? I don't know at the moment. But if the -- the
5 presumption here at that stage was that it would be
6 an entirely new thing rolled out and, therefore, the
7 audits would be required, and that would remain the same
8 if that becomes the case.

9 **Q.** When you say you don't know at the moment whether it
10 will become a new thing or not, NBIT's relatively far
11 down the line now, certainly in terms of the time it's
12 being taken to be built, are you sufficiently aware of
13 those developments of NBIT to be able to forward plan?

14 **A.** Not at this stage, no.

15 **Q.** Why not?

16 **A.** Because I'm not sure -- I think the strategic review and
17 the NBIT project are yet to settle on something firm to
18 that level of detail, I think. I have provided a this
19 what we would need from an investigative perspective, in
20 terms of data access and understanding and things like
21 that, so I have been engaged at that level.

22 **Q.** We saw from the reporting lines, you report to the
23 Interim General Counsel. Do you think that you are
24 sufficiently involved in the business, both structurally
25 and in practice, to be able to input sufficiently into

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1 the NBIT system?

2 **A.** I mean, it's a technical project, and we are being
3 consulted and we are providing an input in terms of,
4 from a practical point of view, once it's in place, what
5 we would need in terms of data to be able to perform our
6 role.

7 **Q.** How about the concern that's being raised here: do you
8 think the business sufficiently understands the
9 resourcing impact that the all-branch audit, for
10 example, or simply the new system, might place on you?

11 **A.** I believe so it was evident in this paper, and it
12 wouldn't be CIU that would need to be involved: there
13 were many operational teams that would need to be
14 involved in that rollout.

15 **Q.** Can we turn over the page, please, and there's a section
16 there on NBIT rollout and assisting the reset. It says:
17 "All suspected theft/frauds to be passed to CIU who
18 will then triage them and report as necessary to the
19 police. Where a report is for amounts in excess of
20 £100,000 then CIU will provide active investigative
21 support to the police. Where the summed is below
22 £100,000, CIU will form a link between the Retail
23 Central Operations investigation teams and the police to
24 facilitate the obtaining of evidence and witness
25 statements by the police."

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1 moment, we apply the same level within our teams at the
2 moment but we flex it depending on available resource
3 and what matters are requiring investigation.

4 **Q.** If we look down to "Business Integrity Operations (1) --
5 protection of public funds". It says:
6 "Investigate all suspected theft and fraud offences
7 against the [Post Office] and manage the interaction
8 with police for cases over the value of £100,000. For
9 matters below £100,000, CIU will manage a reporting
10 process to the police, but the police will need to deal
11 directly with other [Police] teams ..."
12 Sorry, that's --

13 **A.** "POL teams".

14 **Q.** The second bullet point there:
15 "Provide support to case having and testing of
16 evidence for civil recoveries [over] £50,000. Matters
17 below £50,000 would need to be supported by external
18 counsel (for which there is currently no funding) or not
19 proceeded with."
20 Can you assist us with that?

21 **A.** At the time that this was written, there was work
22 underway to look at whether civil cases was an option,
23 and as we -- as I mentioned earlier, the anticipated
24 involvement of A&CI, or CIU as it was then, would be to
25 effectively provide quality assurance over the evidence

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1 Is that still the intention?

2 **A.** I think it would be the start point. There is no plan
3 that's cast in stone at this stage.

4 **Q.** I don't want to pin you down on dates again but when do
5 you anticipate have to a plan might be in place?

6 **A.** I think it would depend on what the target rollout date
7 is, and I don't know what that is.

8 **Q.** Is there a risk by placing this value threshold -- say
9 £100,000 goes to your team, below that goes to another
10 team -- of some two-tier system developing within the
11 Post Office with respect to investigations?

12 **A.** So this is in terms of -- so what it says here is that
13 we would provide active investigative support to the
14 police for over 100,000, but we would introduce the
15 police investigators for other matters below that
16 100,000 direct into the business.

17 **Q.** Yes.

18 **A.** So you're still having police look at all of those
19 matters, so that's the same; the difference is the level
20 of involvement from my team. But it is a two-tier
21 system.

22 **Q.** Do you think the 100,000 mark draws a line
23 appropriately?

24 **A.** I think that flexes, depending on -- well, it would --
25 it's a start point. It's slightly arbitrary and, at the

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1 that had been collected.

2 **Q.** At that point in time there was currently no funding; is
3 there funding for that and what's currently envisaged
4 for that?

5 **A.** I don't believe there is funding. I think it's still
6 a concept under discussion.

7 **Q.** Thank you. Can we please turn to POL00447948. There is
8 then discussion of this paper at the Group Executive
9 level on 28 June 2023. Sarah Gray is present at this
10 meeting. Were you an attendee?

11 **A.** Er --

12 **Q.** Pardon?

13 **A.** Sorry, I was just thinking. I don't know. I'm not
14 listed as having attended.

15 **Q.** If we turn to page 6, it has your name but it may be
16 that your name is on the paper rather than attending it.

17 **A.** *(The witness nodded)*

18 **Q.** Actually, no, it does mention "JB", so let's have
19 a look. If we scroll down, please, to the bottom of
20 page 6, it appears that you were at the meeting.

21 **A.** Okay.

22 **Q.** It's over the page, sorry. It's internal page 6, our
23 page 6. "Central Investigation Unit Resourcing", if we
24 scroll down.

25 **A.** Yes, I'm noted there as attending but not at the top.

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1 Q. Yes. It says:
 2 "JB [you] spoke to the paper outlining the request
 3 for additional resource to service the backlog of
 4 investigations (which was increasing) and also to pin
 5 additional support ahead of the rollout of NBIT where
 6 there could be a number of referrals to CIU."
 7 It sets out there "Even if the 1%", that's exactly
 8 the same as in the paper itself:
 9 "NR [Mr Read] queried how would [you] prioritise
 10 [business as usual] work in [your] team. [You] replied
 11 referencing the prioritisation as set out in the paper
 12 ...
 13 "KS [I think that's Kathryn Sherratt] clarified that
 14 the ask was an increase in budget. [Sarah Gray] replied
 15 that it was, however outlined the potential financial
 16 pay back with future years. [You] noted this and shared
 17 [your] view financial savings should not be the basis
 18 for the decision ..."
 19 I think that's the point you were making in your
 20 evidence earlier.
 21 A. Yes.
 22 Q. "... it was only one element. KS advised that whilst
 23 the Group Executive did not appear to disagree with the
 24 ask, that there needed to be understanding as to where
 25 this money would come from in the budget ..."

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1 unfair.
 2 Q. "ACTION KS noted similar requests for additional funding
 3 that had been and were coming to the Group Executive and
 4 advised that the Group Executive needed to devise
 5 a process to deal with these requests as the year went
 6 on. [She] advised she was happy to take an action to
 7 think about the best way to process these requests."
 8 You have there:
 9 "The [Group Executive] RESOLVED:
 10 "that the priorities for CIU [for those financial
 11 years] are ... APPROVED; and
 12 "in order to prepare for and manage anticipated
 13 pre-NBIT rollout branch audit matters additional funding
 14 in the amount of £360,000 to provide the resource as set
 15 out in the paper is hereby APPROVED."
 16 But it then says:
 17 "The [Group Executive] declined to approve the other
 18 additional funding requests in the paper at this time."
 19 Where did that leave matters and have matters
 20 changed since then?
 21 A. So the 360 for the NBIT was to come from the NBIT
 22 budget, so it was to use an existing budget to pay, if
 23 required, whenever we got around the NBIT rollout, that
 24 we could provide that support to that programme, which
 25 in effect meant no extra money was being assigned out of

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1 Over the page, please.
 2 "TM [Mr McInnes] queried whether a scaled up CIU
 3 team was part of path clearing and NBIT preparation.
 4 [Mr Mladenov] replied that the additional resource in
 5 the CIU team required for NBIT should be charged to
 6 NBIT. [You] contributed that it was not simply an issue
 7 of scaling up the team, it was a matter of matching
 8 resource to task."
 9 What do you mean by that?
 10 A. So there are two approaches to team staffing and remit
 11 making. One is, you decide what you want to achieve and
 12 you resource it properly, or you decide what your
 13 resource is, and you task reasonably what that team can
 14 deal with. We had neither of those.
 15 Q. "[You] raised a concern around fairness to postmasters
 16 with relation to the capacity of CIU, for example,
 17 suspended postmasters would remain suspended until CIU
 18 had capacity to address the case ..."
 19 Can you expand on that, please?
 20 A. Yes, that's talking hypothetically that, if a matter was
 21 referred to CIU for us to investigate, because it --
 22 there was some suspicion of dishonesty and if, as
 23 a consequence of that referral, the Contracts team had
 24 suspended a postmaster, a case sitting on our books
 25 because we don't have enough people to deal with it is

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1 the normal Post Office budget because it was the NBIT
 2 budget. So where that left us was I didn't get any
 3 additional resource and, to a point you've made
 4 previously, which is that this is an example of no
 5 decision making.
 6 Q. Is it still the position?
 7 A. I've had some additional, I think two, fixed-term
 8 contract provision since. But I don't have a team --
 9 going back to those two options, we don't have enough
 10 people in the team to deal with -- comfortably deal
 11 with, in a way that won't break my people, what's being
 12 asked of us, and we're spending a lot of money on
 13 external lawyers to do that work that we can't do.
 14 Q. When you say "external lawyers", we spoke much earlier
 15 about using external firms.
 16 A. Yes.
 17 Q. In respect of what work and how, actually, is that
 18 a saving to the business?
 19 A. It isn't a saving to the business.
 20 Q. Why is it, in your view, that funding can't be extended
 21 to your team in the way that you're asking?
 22 A. So we get it -- we get funding on a -- so -- an outcome,
 23 actually, from what Kathryn Sherratt is talking about in
 24 this paper is that an Operational Expenditure Committee,
 25 I think it's called, was established, which is a central

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1 point for all teams within the organisation to go to
2 when they've got unexpected funding requests. So that
3 was a positive outcome. It was centralised, it was more
4 coordinated.

5 And when we have an investigation where we feel
6 there's a need to go outside to have law firms or
7 whoever, accountancy firms, conduct that investigation,
8 we go there and we ask for the money, and that has, so
9 far, always been authorised. But what hasn't been
10 authorised is a permanent increase in the headcount
11 within my team. So, initially, those two extra
12 Investigation Managers that I mentioned earlier, they
13 were to be permanent, they were authorised to be
14 permanent, and then it was downscaled to being temporary
15 on a fixed-term contract for a year.

16 So I think -- I can understand a commercial decision
17 being let's have a -- let's not increase an ongoing
18 expense, it might be simpler to -- or more expedient to
19 have a temporary increase in cost.

20 **Q.** Thank you. There's one final document that we'll go to
21 before the lunch break and that is at POL00458015. The
22 document we've just been looking at is June 2023, this
23 now October 2023 and it's a Post Office Board meeting.
24 If we could please turn to page 117. Sorry, it might
25 take a moment to come up.

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1 provision of evidence to the police where [the Post
2 Office] suspects that they have been a victim of a crime
3 and allow more efficient sharing of evidence with
4 police."

5 Can you assist us with the purpose and the
6 background to this?

7 **A.** So it's two-fold. The first request was in a compliant
8 way -- policy compliant way that the Board approved the
9 passing of evidence to Police Scotland on a case that
10 they were investigating. So that was the first one.

11 And then it was to elicit, or -- yes, to elicit
12 views from the Board as to what their views would be
13 about a change of process in terms of authorising future
14 passing of evidence to law enforcement.

15 **Q.** Can you assist us with how this developed at Board
16 level, whether it was approved or not approved?

17 **A.** So they approved the passing of that in compliance with
18 the policy, of that particular piece of evidence to the
19 police, and then there was a discussion in the Board
20 that did not approve but wanted further discussion,
21 about the change in authorisation levels.

22 **Q.** Do you understand why it was not approved?

23 **A.** It was very difficult to tell, during the course of that
24 Board meeting. It wasn't the best run Board meeting.
25 People were talking over each other. It was struggle to

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1 If we go over the page, perhaps. This is
2 a document, a Board report, dated 31 October 2023. It's
3 written by you. I'm just going to read to you from the
4 "Input Sought" and the "Executive Summary", and this is
5 something that we spoke about earlier today:

6 "The Board is asked to 1) approve in line with
7 policy to pass evidence to Police Scotland; and 2) for
8 Board to discuss the pros and cons of a policy change
9 which would allow a more confident handling of Horizon
10 data and its provision to law enforcement."

11 The "Executive Summary" says:

12 "[Post Office's] current Investigation Policy,
13 Cooperation with Law Enforcement Policy, and Legal Play
14 Book requires Board sign-off to permit the passing of
15 HNG-A Horizon evidence to the police to support their
16 investigations where [the Post Office] may be the victim
17 of a crime;

18 "In line with this Policy, Board sign-off is sought
19 for the passing of evidence to Police Scotland relating
20 to", and that's a particular case?

21 **A.** Yes.

22 **Q.** "Following the implementation of robust processes and
23 the hiring of highly experienced staff, a change to the
24 current Policy and Play Book is recommended. This would
25 remove the necessity for Board approval prior to the

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1 understand the different views that were being said at
2 the time but I think the underlying objection for
3 those -- so some of the Board supported the change;
4 others didn't; others, I think, were unsure. And so
5 they agreed that they wanted more discussion about it.
6 But I think those that were in the "No, we shouldn't
7 change" group, I think they felt that what would be
8 passed would be data that could be considered to be
9 unreliable, that they still viewed or felt that it could
10 be viewed that the data was flawed.

11 **Q.** We'll get to --

12 **SIR WYN WILLIAMS:** The date of the meeting is what, sorry?

13 **MR BLAKE:** 31 October 2023.

14 **SIR WYN WILLIAMS:** 2023. Sorry, if you were going to ask
15 this question, Mr Blake, but this actual issue is still
16 under debate in October 2024, is it not?

17 **A.** Yes, sir.

18 **SIR WYN WILLIAMS:** Right.

19 **MR BLAKE:** You've said "not very well run". Can you assist
20 us with that: who was running it at that stage?

21 **A.** Henry Staunton was the Chairman.

22 **Q.** What did you identify as the issue with regards to how
23 it was run?

24 **A.** There was no structure or control over the conversation.

25 **Q.** Were there particular tensions between particular

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1 groups?

2 **A.** Yes, I think the group that felt it was appropriate for
3 a change were disagreeing with the group that felt that
4 there shouldn't be a change and they weren't really
5 listening to each other.

6 **Q.** If we go over the page, please, we see there it says:
7 "The current Group Investigation Policy was written
8 during the long hiatus from 2015 to 2023 where [the Post
9 Office] did not conduct investigations nor proactively
10 pass evidence to the police. This Policy identifies at
11 1.3 Core Principles, including proactively reporting
12 matters to law enforcement and the manner of the
13 provision of information and for what purpose it may be
14 shared.
15 "Policy minimum control standards requires that the
16 Group Legal Director makes the decision to report
17 a potential crime against [the Post Office] to law
18 enforcement. Tool 2 of the Legal Play Book is
19 a flowchart which lays out how data intended to be
20 shared is categorised by risk and how it may be provided
21 to law enforcement.
22 "Where the evidence is not Legacy Horizon or HNG-X
23 and where there is no reason to believe the data to be
24 provided is unreliable or inaccurate, corroborative
25 evidence should be sought. Where none can be discovered

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1 the current status of those discussions? Your evidence
2 has been that that change hasn't been made; why do you
3 think it hasn't been made, and who do you think is
4 responsible?

5 **A.** So I think that the decision hasn't been made because of
6 the obvious sensitivities connected to saying,
7 "Actually, we think the version of Horizon that we run
8 at the moment is fit for the business to use". I find
9 that slightly odd because, if there were concerns, why
10 are we using it?

11 **MR BLAKE:** Thank you.

12 Sir, that might be an appropriate moment to take our
13 lunch.

14 **SIR WYN WILLIAMS:** Yes, by all means, yes.

15 **MR BLAKE:** Can we come back at 2.00, please?

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

17 **MR BLAKE:** Thank you very much.

18 (12.57 pm)

19 (The Short Adjournment)

20 (2.00 pm)

21 **MR BLAKE:** Good afternoon, sir.

22 **SIR WYN WILLIAMS:** Good afternoon.

23 **MR BLAKE:** Mr Bartlett, I'm going to pick up where we left
24 off, and that is the issue of reliance on Horizon data.

25 I want to go back in time slightly and, if we could

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1 in [the Post Office's] control, the evidence is to be
2 considered Medium Risk."

3 Can you assist us with that paragraph in particular
4 and how it is that corroborative evidence can be sought?

5 **A.** So that part of the policy is basically saying: if it's
6 the current version of Horizon, it can be passed, but it
7 would be -- sorry, it would be considered medium risk if
8 there wasn't anything else to corroborate that evidence.

9 **Q.** Does that reflect in some way a concern that there may
10 be unreliable data within even the new system?

11 **A.** I didn't write that and I wasn't party to it, but my
12 reading and my understanding from those that were around
13 at the time is that it's a sensitivity issue, not
14 necessarily a distrust of the data. It's a "We're
15 seeking to rely on Horizon data; that didn't go well
16 before".

17 **Q.** 1.4 says:

18 "Point 3 of Tool 2 describes how the provision of
19 Medium Risk data to law enforcement must be managed:
20 'The data must not be provided unless [the Post Office]
21 is legally compelled to provide it or the Board approves
22 its voluntary disclosure'."

23 It's that point that you were seeking to change?

24 **A.** Correct.

25 **Q.** Thank you. In line with the Chair's question: what is

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1 begin with BEIS0000789. These are notes from a meeting
2 you weren't present at but I think it does set a scene.

3 This is the Post Office quarterly shareholder
4 meeting on 10 January 2023. If we scroll down, we can
5 see who was present. Please can we turn to page 4.
6 There's discussion there of what to do in respect of
7 losses. I'd like to take you to the third bullet point.
8 It says:

9 "AC [I think that's Mr Cameron] mentioned they are
10 seeing a rapid increase in losses including shortfalls
11 of cash in branches. [The Post Office] need to conduct
12 a proper investigation and demonstrate whether the
13 postmasters are accountable. However, it is difficult
14 to conduct a proper investigation based on the Horizon
15 data, and also [the Post Office] are not in a position
16 to ask for the relevant money back in the current
17 climate. It was noted as not a good time to prosecute
18 postmasters due to the current historical cases, but
19 this is seeing a rapid rise in losses for [the Post
20 Office]. MR's team are working on putting a new system
21 in place."

22 Was that a feeling that you shared as at January
23 2023?

24 **A.** I was not aware of that.

25 **Q.** No? How about at the present time: is there, for

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1 example, a rapid rise in losses for the Post Office?
 2 **A.** I don't know.
 3 **Q.** If we look down it says:
 4 "AC raised that there are other solutions rather
 5 than going to the police. If postmasters are
 6 responsible and don't pay the money back, there is
 7 an option to take it off their remuneration. Any
 8 solutions as to how any shortfalls that postmasters are
 9 accountable for can be recouped from postmasters, aside
 10 from remuneration, were noted as preferable.
 11 "[Post Office] -- In cases where there is fraud,
 12 these could be tested in a civil jurisdiction. A paper
 13 on this was noted as being worked on currently and would
 14 be raised to [the Government] in due course."
 15 Are you aware of that paper having been developed at
 16 all?
 17 **A.** I think that might have been the paper or the work that
 18 I referred to earlier today but -- I'm not sure about
 19 the timing but I think it might be.
 20 **Q.** Has that work been completed?
 21 **A.** Yes, and I think that's led to there's no decision at
 22 the moment, and I think, as Mel Park said yesterday,
 23 it's still being considered.
 24 **Q.** Thank you. If we scroll down, it says there:
 25 "[Post Office] noted that where full investigations
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1 **A.** Judgment --
 2 **Q.** "... /Data."
 3 Then he sets out various things that need to take
 4 place. But, as you said, your understanding at this
 5 time, you didn't have understanding of these issues at
 6 this time?
 7 **A.** No.
 8 **Q.** Can we please turn to POL00448362. This is a loss
 9 recovery update. We have metadata that suggests it's
 10 from February 2024. It does refer to your team in its
 11 current form. Are you able to assist us with when this
 12 might have been produced?
 13 **A.** No, I think the first time I saw this was when it was
 14 raised with other witnesses in the last week or two.
 15 **Q.** If we turn to page 3, it's the "Background" section, and
 16 this you may have seen raised with other witnesses:
 17 "Following the recommendations made in the Group
 18 Litigation Order and Common Issues Judgment, [the Post
 19 Office] ceased action to recover Established Losses from
 20 [postmasters]. This activity has been on hold since
 21 this time, except where a [postmaster] both agrees to
 22 repay the established loss and proceeds to repay.
 23 "To support implementation of associated [Common
 24 Issues] recommendations, a new team ... and target
 25 operating model was set up ...
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1 are done quite often [the Post Office] does get the
 2 repayment. The issue is that the investigation has to
 3 be good enough and that it is independent. However, the
 4 problem is that the data is not sufficient to do
 5 an investigation in many cases.
 6 "[Mr Read] noted that ultimately those who steal
 7 from [the Post Office] will be prosecuted."
 8 The concerns about the data not being sufficient for
 9 an investigation: as at January 2023, are you aware that
 10 that was a concern within the organisation?
 11 **A.** So at I think about that time there were concerns not
 12 over Horizon data but over stamp stock dispatch data,
 13 and I know Al Cameron was close to those issues. But
 14 this does seem to say it relates to cash shortfalls and,
 15 no, I wasn't aware of that.
 16 **Q.** If we turn, please, to POL00423698. Around this time,
 17 24 January, we have an email from Mr Cameron to Nick
 18 Read. It's not an email you were copied into at the
 19 time but he says:
 20 "My view on losses, which I think you would know
 21 but:
 22 "From a cultural view we cannot start trying to take
 23 money off postmasters until we have demonstrated HIJ
 24 ..."
 25 I think that's Horizon Issues Judgment.
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1 "The process to review a discrepancy and identify
 2 the cause is formally documented and regularly assured
 3 by the Assurance and Complex Investigation Team."
 4 So that's your team?
 5 **A.** Yes.
 6 **Q.** That's an accurate statement?
 7 **A.** So the -- yes, it is.
 8 **Q.** "This includes looking at Horizon transaction data to
 9 ensure Horizon acted as expected and is therefore
 10 unlikely to be the cause of the discrepancy."
 11 Just pausing there, I think we addressed this
 12 previously but the looking at Horizon transaction data,
 13 can you assist us with what that involves?
 14 **A.** So the safeguard side of this are the actions taken
 15 within the Retail Teams, which is what bugs, errors,
 16 defects had been reported that could be referring to
 17 that branch, at the relevant time, and the relevant
 18 transaction type. They look at training issues, they
 19 look at calls into what is effectively Tier 1, the call
 20 centre and then they look all the way through. So
 21 I think that's what that means.
 22 **Q.** "There are a number of possible outcomes ...
 23 "Write off as below *de minimis* value ...
 24 "Write off as the cause has not been established,
 25 "Correct with a transaction correction if the cause
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1 was due to a processing error,
2 "Establish that the loss has arisen on the balance
3 of probabilities, due to the negligence, carelessness or
4 error of the [postmaster] and/or their assistants.

5 "In the last case above, the [postmaster] is asked
6 to contact the Postmaster Account Support Team to
7 arrange repayment ...

8 "If the [postmaster] disagrees with the findings,
9 they are able to refer through an internal dispute
10 process ...

11 "Currently repayment for discrepancies is only
12 sought from a [postmaster] voluntarily ..."

13 Then it is 7, really, that I'd like to look at:

14 "Whilst the current discrepancy review process does
15 involve checks in Horizon, the target operating model
16 and ultimately any recovery activity is predicated on
17 Horizon data being robust and for [the Post Office] to
18 be able to rely on this data. [The Post Office] is
19 currently awaiting confirmation from both Fujitsu and
20 [Post Office] IT that this is the case."

21 Now, if that metadata is right, if this was February
22 2024, are you aware since then of confirmation being
23 provided by Fujitsu and the Post Office IT Team that
24 that is the case?

25 **A.** So, the letters that have been brought up at the Inquiry
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1 **A.** I believe he's the relationship manager at Fujitsu.

2 **Q.** Thank you. We've seen this email before but I will read
3 from it because it's quite an important document in the
4 context of this dispute:

5 "One of my team has gone back to City of London
6 Police to see how the contact you referenced below was
7 progressing as we have an open and objective engagement
8 with [City of London Police City] on this matter.

9 "[City of London Police City] has informed us that
10 they have not had any additional information nor contact
11 with Fujitsu after the single, exploratory and
12 inconclusive conversation. They left that conversation
13 with the feeling that they were indirectly being told
14 that the Horizon system was unreliable and so the case
15 could not progress. We really need to explore this as
16 this is not the nuanced impression Simon Oldhall has
17 given me.

18 "As the potential victim in this case, [Post Office]
19 would be grateful if you could provide me with contact
20 details for either the equivalent person in Fujitsu ...
21 to my role ... or an appropriate person in your UK legal
22 team. I will then pass those details on to [City of
23 London Police] who are looking to have a trilateral
24 conversation with Fujitsu, [Post Office] and [City of
25 London Police]."

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1 over the last few weeks from Fujitsu, between Fujitsu
2 and POL, I think the final sort of letters on there show
3 that, although Fujitsu do not want POL to use Horizon
4 data for this sort of activity, they did not say it was
5 unreliable. In fact, they said that the data could be
6 used for appeals and it could be used for the
7 calculation of compensation for postmasters.

8 So I think that has been taken as a confirmation
9 that the data is correct because Fujitsu would not, I am
10 sure, want that data to be used in a Court of Appeal
11 case if it's not accurate.

12 **Q.** So your reading of all of the correspondence, and we'll
13 get to some of it, between Post Office and Fujitsu, is
14 in effect confirmation from Fujitsu that the Horizon
15 data is reliable?

16 **A.** Yes, and also, if I may say, is -- there must be a duty
17 on Fujitsu to declare if they think it is unreliable,
18 and they haven't, as far as I'm aware.

19 **Q.** Can we please turn to FUJ00243203. This is, I think,
20 the beginning of a dispute between you and Fujitsu. It
21 may have a longer history than that but I'm just going
22 to take you to this particular document, which relates
23 to supporting a City of London Police investigation.
24 That is 19 April, and it's an email from you to Daniel
25 Walton; who is Daniel Walton?

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1 Just pausing there, do you think it is appropriate
2 for the Post Office, who could in some senses be
3 described as the victim -- and we will get to whether
4 "victim" is the right word or not -- do you think it is
5 right for the Post Office to be contacting Fujitsu in
6 respect of the City of London Police investigation?

7 **A.** Yes.

8 **Q.** Why do you say that?

9 **A.** Because the feedback that we were provided from City of
10 London Police showed that there was some confusion as to
11 what was wanted and what was needed, and I felt that, if
12 I could speak to another investigator within the Fujitsu
13 organisation, that they would understand the evidential
14 needs of City of London Police and, therefore, be able
15 to better help the City of London Police.

16 **Q.** Why, in your view, was it appropriate for Post Office to
17 do that conversation rather than, for example, the City
18 of London Police directly?

19 **A.** Because it was agreed with City of London Police that we
20 would do that.

21 **Q.** The next paragraph says:

22 "It is impossible to overstate how important this
23 is: I need to advise both the police and [Post Office]
24 as to the evidentially-established reliability (or not)
25 of data that is being used every day in establishing

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1 outcomes with postmasters and, potentially, to be
2 presented to the criminal justice system by the police
3 and the three public prosecuting agencies. The
4 non-provision of relevant witness statements from [Post
5 Office] and Fujitsu will rightly be interpreted by the
6 police and prosecutors as [Post Office] and Fujitsu not
7 having faith in the reliability of the data with the
8 obvious outcome resulting."

9 What do you mean by "with the obvious outcome
10 resulting"?

11 **A.** So two different things: one is the immediacy for that
12 investigation, which would be closed, which, just to be
13 clear, we would agree with. We're not trying to push
14 through that case to conclusion. We want the evidence
15 to be tested by the police.

16 And then the broader outcome is if Fujitsu provided
17 a witness statement to the City of London Police that
18 looked at the individual transactions and whether, at
19 that time, date and that branch, with those particular
20 transactions that that evidence was -- that those
21 transactions were not necessarily reliable, that would
22 mean something would need to be done in terms of looking
23 into whether it's a systemic issue or just relating to
24 that branch.

25 But by failing to provide any witness statement,
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1 **A.** Sorry, Mr Blake, just before we go on to this, can
2 I help a bit further? I think we will probably have
3 material from that period in time, that was
4 contemporaneously made, that will show that we were
5 thinking about the wider impacts of this. It may not be
6 reflected with clarity in my email that you've just
7 shown, but I believe we have material that might be able
8 to demonstrate we were thinking about the wider impact.

9 **Q.** Sorry, what do you mean by that; do you mean the focus
10 on the final few words --

11 **A.** The outcomes, yes.

12 **Q.** So I think your evidence is that you could have
13 articulated it better, is that --

14 **A.** Yes.

15 **Q.** Thank you. Looking at this letter, this is a letter
16 from yourself to the Lancashire Constabulary. Could we
17 perhaps bring up on to screen your second witness
18 statement, which is WITN11190200.

19 As the Chair has highlighted, there is an annexe to
20 your witness statement that includes a list of different
21 cases. It's at the back of your statement, and I'll
22 just take you, please, to page 105, so this where it
23 begins. Can we please turn to 118. There's a reference
24 there to Lancashire Police, case of 14 September 2022,
25 money laundering and theft. Is that the same case as we
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1 which was what -- the impression we were being given at
2 that stage, means that doubts should be brought into the
3 reliability of the whole system. So the outcome would
4 be that we would be recommending that, urgently, the
5 organisation -- Post Office looks at whether we should
6 continue to be using Horizon and to calculate payments
7 to postmasters, to whether our annual report and
8 accounts should be signed off. It's a significant
9 issue.

10 **Q.** The obvious outcome resulting, though, one reading of
11 that sentence is what you're saying there is that,
12 without it, the police are obviously going to drop the
13 case?

14 **A.** That was -- that is one outcome, yes.

15 **Q.** That's the obvious outcome, isn't it?

16 **A.** It is one of the obvious outcomes, yes.

17 **Q.** Did you mean for that to imply several obvious outcomes?

18 **A.** Yes.

19 **Q.** Did this come as a surprise to you?

20 **A.** Yes, it did.

21 **Q.** We saw that discussion from a year earlier, concerns
22 within the business. Why do you think it is that those
23 concerns hadn't reached you and your department?

24 **A.** I'm not sure.

25 **Q.** Could we please turn to FUJ00243192?
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1 see this letter relating to?

2 **A.** Yes.

3 **Q.** Thank you. I'll just read for background that section
4 that says:

5 "The branch which was run by an Officer In Charge,
6 not the postmaster, was initially flagged by the Cash
7 Centre due to an increase in cash remittance return
8 amounts to the Cash Centre. It was also highlighted by
9 the MoneyGram compliance team that they wanted to
10 complete a compliance call with the branch to a large
11 number of high value transactions being completed to the
12 same destination. At this point the Financial Crime
13 team was involved and highlighted circa ..."

14 Is that £3.3 million?

15 **A.** Yes.

16 **Q.** "... worth of MoneyGram Mobile send transactions
17 processed at the branch. The Financial Crime team
18 contacted the branch on requesting more information
19 regarding these transactions. On the same day, the
20 Financial Crime team was contacted by the Area Manager
21 who advised that the postmaster was in touch with them
22 and advised of a possible shortfall of £400,000 which
23 was related to the MoneyGram transactions. The CIU was
24 advised of the situation and tasked with completing
25 an investigation into this matter. Police have
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1 interviewed the OIC ..."

2 That's the person in charge of the Post Office?

3 **A.** Yes. Sorry. Yes.

4 **Q.** "... and restrained [circa] £500,000. Enquiries

5 indicated by Horizon was a shortage of £398,000 which if

6 proved would be a loss to [the Post Office]."

7 So it's a case involving nearly £400,000 of

8 potential loss to the Post Office.

9 **A.** Correct.

10 **Q.** "Police worked on the basis that the OIC 'creamed off'

11 this amount from the cash transferred through MoneyGram.

12 Customer is considered money laundering suspect and OIC

13 suspected for potential conspiracy [regarding] money

14 laundering and theft of [circa] £398,000 from [the Post

15 Office]."

16 If we return, please, to page 118. We see on the

17 second from right column:

18 "Police requested statement regarding robustness of

19 Horizon -- [Post Office] producing a statement and also

20 referred police to Fujitsu."

21 Has the Post Office produced a statement relating to

22 the robustness of Horizon?

23 **A.** That is in train and it is to be delivered by the end of

24 next month to Lancashire Police.

25 **Q.** If we go back to the letter, please, it's FUJ00243192.

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1 progressing to a charging decision. It is not for [the

2 Post Office] to influence the independence of the

3 investigation or the assessment of evidence in any case,

4 however, the reasoning around the credibility of the

5 Horizon system seems to be a significant factor, if not

6 the central factor, in the reasoning for not progressing

7 this investigation further and that reasoning appears to

8 be based on a misinterpretation of the findings of

9 courts.

10 "[The Post Office] have been asked to address three

11 questions in respect of the decision to No Further

12 Action this matter ..."

13 So had a decision to no further action the matter

14 taken place by this stage or was that something that was

15 just in contemplation.

16 **A.** I'm not sure, at this stage.

17 **Q.** "[Post Office] hopes that the information provided below

18 in respect of these questions is sufficient to assist

19 with a review of that decision. The questions posed

20 are:

21 "(a) the new Horizon system is much more reliable

22 than the old system

23 "(b) evidence that a court has ruled so

24 "(c) that the new system was installed and in place

25 [in that particular post office]."

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1 It looks as though, as at 25 April of this year, the

2 police had taken no further action in respect of this

3 case; is that correct?

4 **A.** No, they'd submitted an advice file to the Crown

5 Prosecution Service and the Crown Prosecution Service

6 came back to them in relation to the money laundering

7 and the theft case matters that they wanted some --

8 effectively, a corroborative witness statement from

9 Horizon to support other evidence that the police had.

10 **Q.** When you say from Horizon, from who: from the Post

11 Office or from Fujitsu?

12 **A.** CPS, I don't think, specified, but I'm not sure but, in

13 effect, the best evidence is held by Fujitsu, as opposed

14 to Post Office, which is why we referred Lancashire

15 Police to Fujitsu.

16 **Q.** I'm just going to read to you from this letter. If we

17 scroll down slightly, it says:

18 "Post Office Legal have reviewed ..."

19 Just pausing there, did you draft this letter?

20 **A.** I stitched it together. The majority of the stuff, of

21 the text in there in relation to Justice Fraser's

22 comments are from the criminal lawyer within house.

23 **Q.** That's Mr Lill?

24 **A.** Lill, yeah.

25 **Q.** "Post Office Legal have reviewed the reasoning for not

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1 If we scroll down, (c) is answered first, and you

2 say:

3 "We can confirm that [that] branch was operating the

4 HNG-A version of Horizon."

5 Then you address questions (a) and (b), and you say:

6 "The Horizon Issues Judgment ... is the judgment of

7 Mr Justice Fraser where, in short, he found there to be

8 numerous bugs, errors and defects affecting the Horizon

9 system that were capable of generating unexplained

10 shortfalls in branch accounts ... In the [Horizon Issues

11 Judgment], Fraser J made clear that it was important to

12 distinguish between the versions of the system in use

13 from 2000 to 2018, and the HNG-A system being used

14 thereafter ..."

15 You set out various sections of the judgment, and

16 there, the first section, Mr Justice Fraser says, for

17 example:

18 "It is agreed by the experts that the Horizon system

19 in its HNG-A form is now relatively robust."

20 Over the page, another section on robustness, where

21 he says that:

22 "... the experts are agreed that it is far more

23 robust than Horizon in earlier times."

24 A further section, where Mr Justice Fraser says:

25 "... there are only isolated instances of it

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1 happening in respect of HNG-A, which the experts agree
2 is a better system than either of the other two
3 iterations of Horizon ..."

4 If we scroll down, please, again:

5 "I have found that the system as it is in 2019 is
6 far more robust than it was prior to 2017."

7 So that's a comparison between the 2017 and 2019
8 versions. You say:

9 "Lancashire police may have noted that the proposed
10 legislation by the government to exonerate all
11 postmasters prosecute by [Post Office] acknowledges in
12 the Explanatory Notes ..."

13 You quote from the government's explanatory notes.
14 It says there:

15 "The Department is not aware of any cases prosecuted
16 by CPS or Post Office Limited involving the HNG-A system
17 and therefore has concluded that there is no reasonable
18 case to extend the period [and this is in terms of
19 exoneration] beyond the conclusion of the use of the
20 previous versions of Horizon."

21 Further down the page, you then address the Hamilton
22 case, and you say:

23 "In Hamilton, the [Court of Appeal Criminal
24 Division] defined a case as a 'Horizon case' where the
25 reliability of Horizon data was essential to the

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1 clear the safety of those convictions, even though the
2 evidence relied upon was taken from versions of Horizon
3 that were the subject of the [Horizon Issues Judgment],
4 are not unsafe where there is other evidence of the
5 offence being committed or where the Horizon data was
6 used to corroborate other evidence."

7 Over the page, please. It's a passage on the next
8 page that I'd like to focus on. If we scroll down,
9 thank you, it's that passage there:

10 "If the defence were to challenge the reliability of
11 Horizon data, which the Post Office accepts is highly
12 likely, the prosecution would be entitled to rely upon
13 the findings of [Mr Justice Fraser] and the [Court of
14 Appeal Criminal Division] as set out above."

15 Is that accurate?

16 **A.** That information, that section, was provided by the
17 inhouse lawyer.

18 **Q.** Looking at it as somebody who, for example, has
19 a graduate diploma in law, do you consider that passage,
20 which was in a letter which you signed, to be accurate?

21 **A.** So it would certainly be useful to a prosecutor to be
22 able to draw on that judgment in discussions with
23 defence, which I think is the point that the lawyer is
24 trying to make. I don't think he's suggesting it's
25 evidence; I think he's suggesting that it's useful, in

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1 prosecution, in that there was no independent or
2 corroborative evidence of an actual loss from the branch
3 account as opposed to a shortfall where Horizon evidence
4 formed part of the evidence of the shortfall or
5 corroborated other evidence."

6 Over the page, please. You say:

7 "It is important to note that the Horizon scandal
8 relates specifically to [the Post Office] prosecutions
9 of postmasters for shortfalls in their branch accounts
10 where the only evidence to prove the loss was a reliance
11 on data from the Horizon system."

12 Is that accurate, do you think?

13 **A.** That was the information provided to me by the inhouse
14 lawyer.

15 **Q.** The next paragraph says:

16 "The decision to NFA the investigation appears to be
17 based on the public perception of the scandal and the
18 versions of Horizon in use at the time of the scandal.
19 It is not clear whether the CPS EIA have considered the
20 written judgments of the Horizon scandal when assessing
21 that the undermining issues in the case outweigh the
22 realistic prospect of conviction."

23 It says:

24 "Further, the [Court of Appeal Criminal Division]
25 have reviewed many appeals of convictions and have made

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1 order that it's not just dismissed out of hand. That
2 was the purpose of this letter.

3 **Q.** Don't the police and the CPS have to reach a certain
4 evidential threshold?

5 **A.** Yes, they do. This doesn't question that. It's just
6 saying "Please apply an evidential threshold, don't
7 dismiss it out of hand before".

8 **Q.** Is a fair reading of that paragraph not that you can
9 rely on those findings, those judgments, to satisfy the
10 evidential criteria?

11 **A.** No, it's saying, "Please don't dismiss this out of
12 hand", and you could use that judgment in conversation
13 with any defence, should it progress that far. I think
14 that's what he meant by this.

15 **Q.** Do you think that is both fair and accurate?

16 **A.** I think it's fair that this particular case is not
17 dismissed before an evidential test can take place.

18 **Q.** If we could please turn back to your statement and the
19 annexe. That's WITN11190200. Page 105 is where the
20 table begins.

21 We've already looked at page 118. If we could zoom
22 out, please. Bottom of page 118 was where the
23 Lancashire Police case can be found.

24 The wording there, in the second-from-right column
25 is:

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1 "Police requested statement regarding robustness of
2 Horizon -- [Post Office] producing a statement and also
3 referred police to Fujitsu."

4 If we scroll down, please, to page 121. There is
5 a City of London Police case, again, same form of words
6 in that second-from-right column:

7 "Police requested statement regarding robustness of
8 Horizon -- [Post Office] producing a statement and also
9 referred police to Fujitsu."

10 Page 125, there's a section there addressing
11 Gloucestershire police and, again, the same form of
12 words in that column, "Police requested", et cetera.

13 If we scroll down, please, page 126. West Yorkshire
14 case, again, same form of words.

15 Page 127, West Midlands case. Again, same form of
16 words.

17 Putting the Lancashire case to one side, has there
18 been any case where the Post Office has produced such
19 a statement for the police in respect of the robustness
20 of Horizon?

21 **A.** No.

22 **Q.** Is it the intention for the Post Office to produce
23 a statement addressing the robustness of Horizon?

24 **A.** Yes, so it will be -- it's been produced -- we have
25 a draft. It's been produced by Simon Oldnall but, in

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1 looked at it in great deal already in this Inquiry but
2 I'll just look at some of that correspondence. Here we
3 have the letter to Nick Read from Mr Patterson of 17 May
4 this year. He says:

5 "I am writing to you directly in order to raise
6 serious concerns that have come to my attention which
7 indicate that the Post Office continues to pursue
8 enforcement action against postmasters and it expects
9 [Fujitsu] to support such actions.

10 "To be clear, [Fujitsu] will not support the Post
11 Office to act against postmasters. We will not provide
12 support for any enforcement actions, taken by the Post
13 Office against postmasters, whether civil or criminal,
14 for alleged shortfalls, fraud or false accounting.

15 "In particular:

16 "Criminal investigations:

17 "We have become aware of a recent investigation by
18 the City of London Police ..."

19 I think that's the correspondence we've been looking
20 at.

21 **A.** Yes.

22 **Q.** "The approach of [Fujitsu] is to cooperate with the
23 police and any other third party exercising independent
24 investigative, prosecutorial, regulatory or judicial
25 powers.

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1 conversations with Simon Oldnall, he was very conscious
2 that he was preparing a very similar witness statement
3 for the Inquiry and wanted to do this first.

4 **Q.** There is a draft version of that statement. Is that
5 something that can be shared with the Inquiry?

6 **A.** Absolutely.

7 **Q.** Can we please turn to FUJ00243199. Is it your view that
8 that statement will get over the hurdle in respect of
9 the police's ability to rely on Horizon data?

10 **A.** Not entirely, no. I think it will demonstrate the
11 control environment which surrounds the Horizon data
12 within Post Office, which falls under Simon Oldnall's
13 remit. The best -- so that's sort of a broad statement
14 saying what that environment is. The reason we're
15 referring forces to Fujitsu is that that is the best
16 golden source of evidence for them on the
17 transaction-by-transaction basis because no transfer of
18 data has occurred. That is the golden copy. So, for
19 them -- so if we can describe what controls we have in
20 place, to ensure that we know if transactions are not
21 accurate, and if Fujitsu can provide
22 a transaction-by-transaction analysis then we deal with
23 those two demands that they have asked for -- or not, if
24 the evidence doesn't support it.

25 **Q.** Let's look at some of the Fujitsu correspondence. We've

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1 "However, we are concerned by the behaviour of the
2 Post Office Investigation Team on this matter. That
3 team maintains an approach of Post Office as 'victim'
4 and requires [Fujitsu] to provide a witness statement as
5 to the reliability of Horizon data stating that without
6 such statement the case will not progress. For the
7 Investigations Team to act in this matter seems to
8 disregard the serious criticisms raised in multiple
9 judicial findings and indeed exhibits a lack of respect
10 to the ongoing Inquiry."

11 What's your view of what is said in this letter?

12 **A.** So it is not Post Office seeking to pursue a criminal
13 prosecution, it's the police. It's not Post Office. We
14 are not -- we were not looking to pursue any civil
15 outcome, or anything like that. In relation to their
16 concern over the use of the word "victim", if criminal
17 conduct causes harm to the Post Office, that would make
18 us, in common use of the word and in the use within law
19 enforcement, as status of victim or complainant. And
20 that's what, in this case, we could be.

21 **Q.** I think we've seen later correspondence from Mr Read to
22 suggest that won't be used between correspondence
23 between you and Fujitsu?

24 **A.** Yes, I think it might have been Owen Woodley but, yes,
25 in summary, yes.

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1 Q. Were you party to this correspondence; was it discussed
 2 with you at the time?
 3 A. No.
 4 Q. When was the first time you saw this correspondence?
 5 A. I'm not sure.
 6 Q. Is it in your preparation for the Inquiry?
 7 A. No, I did see it before the Inquiry.
 8 Q. We're now in October. This is during the summer,
 9 June/July. Can you assist us approximately with when
 10 you first saw this correspondence?
 11 A. I think I probably saw the first letter after the
 12 response went out.
 13 Q. But you weren't consulted as part of the response?
 14 A. No.
 15 Q. Would you have been expected to have been consulted as
 16 part of the response?
 17 A. Yes, potentially.
 18 Q. I'm going to stick to the timeline so I'll come away
 19 from that Fujitsu correspondence. We're still going in
 20 date order. Can we please turn to POL00448345, and this
 21 is June this year, 26 June, a paper -- a report for the
 22 Senior Executive Group, written by you:
 23 "SEG approval is sought regarding the proposed
 24 change in process in governing the passing of
 25 information to law enforcement to assist them in

1 A. In conjunction with a lawyer, yes.
 2 Q. Yes. If we scroll over the page, we can see the
 3 discussion of the caveat that was to be applied. It
 4 says:
 5 "There are currently 22 police forces requesting or
 6 awaiting Horizon-based evidence across 33 police
 7 investigations. To provide this information [your team]
 8 will need to draw on Horizon data and often provide
 9 transaction analysis. The current approach is that the
 10 Board will need to be approached in the majority of
 11 these matters as and when the data is able to be shared.
 12 "A draft policy is attached ..."
 13 It says:
 14 "In particular, the draft proposes a change in the
 15 governance of passing material to law enforcement which
 16 we believe is risk balanced."
 17 Then it says:
 18 "The below is extracted from the draft ..."
 19 There is a section there that says:
 20 "It is policy that:
 21 "Any information originating from Horizon after
 22 1 January 2022 may be passed as either intelligence or
 23 evidence to [law enforcement agencies] only after [you
 24 or your nominated deputy] and an inhouse criminal lawyer
 25 both give approval. A record of [their] rationale and

1 criminal investigations and any subsequent prosecutions
 2 prior to this matter being discussed at Board in July
 3 2024.
 4 "Executive Summary
 5 "The current Group Investigations Policy ... ('the
 6 CLEP') and [the old policies] are considered too
 7 unwieldy and unnecessarily complex ..."
 8 This is addressing the change we saw at the
 9 beginning of today to the new policy.
 10 If we could scroll down, please. It says:
 11 "The old policies have been consolidated into
 12 a draft single Investigation and Cooperation with Law
 13 Enforcement Policy. The [new policy], amongst other
 14 investigative operational policy changes, proposes
 15 a streamlining of the governance of providing law
 16 enforcement with information: the Director of A&CI and
 17 the inhouse criminal counsel would have to agree to
 18 providing the information and, depending on the age of
 19 the information, a caveat would also be provided."
 20 This is the change that I think we discussed before
 21 the break and we saw the Board's discussion.
 22 A. Yes.
 23 Q. So this is where you wanted to streamline the process,
 24 and effectively for it to be delegate down to yourself
 25 to make the decision and --

1 decision must be recorded ...
 2 "Where information is requested by [law enforcement
 3 agencies] that is Horizon data originating from
 4 pre-1 January 2022, the same process must be followed.
 5 In addition", there is additional wording that should be
 6 applied and we'll have a look at what that additional
 7 wording is.
 8 If we scroll down, it says:
 9 "Best evidence originating from Horizon sits with
 10 Fujitsu and so [law enforcement agencies] should be
 11 encouraged to request this material direct from
 12 Fujitsu."
 13 If we scroll down, it then has the accompanying
 14 lines that would apply to the version of Horizon, HNG-A.
 15 A. No, pre-2022.
 16 Q. Why do you to that line?
 17 A. So from that date onwards there are factors that I think
 18 give us more comfort in the absence of anyone raising
 19 substantial concerns with Horizon, HNG-A, which is the
 20 work that Simon Oldnall described in terms of external
 21 bodies reviewing bugs, errors, removing them, and that
 22 sort of thing. There's also the process that goes --
 23 that the Retail Team goes through that I've described
 24 earlier in terms of checking the reliability at that
 25 branch for those transactions, at the relevant time.

1 And then, also from that -- almost from that time,
 2 my team was in place and we can bring that objectivity
 3 but also that assurance to what happens in the Retail
 4 Team. So based on those three control factors we think
 5 that we should, absent something saying that the whole
 6 system is unreliable, that we should be able to handle
 7 that evidence without Board having to give us
 8 permission.

9 **Q.** The caveat that is attached to the earlier material
 10 being provided would be as follows:
 11 "From 31 December 2019, all post offices have worked
 12 on a version of Horizon that the High Court case of
 13 Bates & Others has been considered by the High Court to
 14 be 'relatively robust'. In 2020, Horizon was tested for
 15 the known errors and bugs identified in the Horizon
 16 Issues Judgment and found not to be prevalent. During
 17 2021, a process was developed to work collegiately with
 18 postmasters to understand the causes any shortfalls.
 19 Any Horizon data that pre-dates January 2022 cannot be
 20 shown to have benefited from all three of those checks
 21 and balances."
 22 **A.** Yes.
 23 **Q.** Are these caveats and these form of words to be included
 24 in a letter, in a statement or something else?
 25 **A.** I think we'd probably put it in an email, in the first
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1 HORice, I believe -- but anyway, data that was used in
 2 the retail space, and we wanted to ensure that those
 3 mining tools were not going to change data in the course
 4 of their extraction.

5 So we worked with Simon Oldnall's team to test the
 6 validity of those tools and where we came to, in
 7 particular, was that the Retail Team used those as
 8 identifiers of something to them to look at, tripwires,
 9 in effect. But any conversation with postmasters or any
 10 data that they rely upon in resolving an issue with
 11 postmasters comes from an original source, not through
 12 those tools.

13 **Q.** Thank you. Could we please turn to the discussion of
 14 this issue at the Group Executive. That's POL00448310.
 15 It's a meeting of 26 June. Could we please turn to
 16 page 7. It's about three-quarters of the way down
 17 page 7:
 18 "Disclosure to support police investigations
 19 "Sarah Gray/John Bartlett."
 20 Did you attend this meeting?
 21 **A.** Yes.
 22 **Q.** "TABLED and NOTED was the paper on disclosure to support
 23 police investigations/passing of material to law
 24 enforcement.
 25 "SEG DECLINED to APPROVE the submission of the paper
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1 instance, or a letter. In reality, we will not -- we
 2 are unlikely to pass any material that pre-dates 2022 to
 3 the police as evidence anyway.

4 **Q.** Paragraph 7 says:
 5 "There are significant differences between the
 6 environment that existed at the time the old policies
 7 were formed and the current and future environment. The
 8 current approach to dispute resolution and the
 9 underlying technology could be seen as supporting a more
 10 [business as usual] approach to passing information to
 11 law enforcement. However, the most significant
 12 difference between 2019 when the old policies were first
 13 drafted and now is that A&CI exists and brings
 14 significant criminal investigation experience to bear,
 15 but more importantly, also considerably more objective
 16 rigour to assessing evidence. Project Panther within
 17 A&CI is solely focused on testing the reliability of
 18 data that the Post Office investigators and law
 19 enforcement will rely upon."
 20 Can you briefly tell us what Project Panther is?
 21 **A.** This is our catch-all project name for us testing the
 22 rigour or reliability of evidence that we rely upon in
 23 our investigations or would provide to law enforcement
 24 and genesis of that was that we came to realise that
 25 extraction tools were being used to data mine from
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1 on disclosure support for police investigations to the
 2 Board, noting further work and assurance was required in
 3 relation to Horizon data assurance."
 4 Can you assist us with that, please?
 5 **A.** Yes, I think, succinctly, they were awaiting Simon
 6 Oldnall's witness statement.
 7 **Q.** Is there a difference between you and the Executive as
 8 to quite how reliable the Horizon data currently is?
 9 **A.** No, I don't think so, and the reason I say that is, if
 10 they genuinely thought that the material produced --
 11 that the Horizon data was flawed, to the extent that we
 12 shouldn't share it with law enforcement, they should do
 13 something about it.
 14 **Q.** Can we please turn to FUJ00243204.
 15 We're continuing chronologically but we're now back
 16 to the Fujitsu correspondence. We're looking at
 17 correspondence of 8 July from Fujitsu. You'll have seen
 18 this, we've read it a number of times, that the fourth
 19 paragraph is effectively a criticism of the letter/the
 20 email that you sent. It then says:
 21 "As the Post Office is well aware, there have been
 22 and there continue to be bugs, errors and defects in the
 23 Horizon system. Further, [Fujitsu] currently has, and
 24 previously had, access to branch transaction records.
 25 Your letter ... also acknowledges the existence of other
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1 matters (beyond the Horizon system) which could have
2 operated to create innocent discrepancies in branch
3 accounts including 'miskeys, or omissions [et cetera]'.
4

5 "In addition to [Fujitsu], the Horizon system is
6 reliant on the delivery of services by Post Office and
7 third parties retained by Post Office."

8 What's your view of what is said here?

9 **A.** The same: that sometimes there are bugs, errors and
10 defects in the system.

11 **Q.** Yes. You're obtaining the statement from Mr Oldnall.
12 Looking at this, do you think that what you're asking of
13 Fujitsu is achievable?

14 **A.** Achievable in the sense that could they produce
15 a witness statement, yes, because what that witness
16 statement would need to cover is a little bit like ours
17 in terms of what the control environment is to protect
18 and assure that data but, specifically, what the police
19 need is, at that branch, at the relevant period, the
20 relevant transactions, was there anything that would
21 make that data unreliable? That's the witness statement
22 that the police need.

23 **Q.** But the kinds of concerns that are being raised here,
24 continued bugs, errors and defects, access to branch
25 transaction records --

26 **A.** Yes.

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1 expert witness, who can provide evidence on the
2 reliability of Horizon data?

3 **A.** That was City of London Police's intent, that they told
4 us.

5 **Q.** You say "was": when was that communicated and how likely
6 is that to happen?

7 **A.** That is prior to these letters. I haven't spoken to
8 City of London since, so I don't know what their current
9 intent is.

10 **Q.** Can we please turn to FUJ00243303.

11 This is a letter from Fujitsu to the City of London
12 Police on 23 August this year. This letter is in your
13 witness pack. Is it a letter that before this Inquiry
14 you were aware of at all?

15 **A.** I don't think I saw this until last night.

16 **Q.** Yes. Is it something that has been discussed with you
17 by Fujitsu at all?

18 **A.** No, which isn't surprising because I think in this
19 letter they say, "Please don't share with any other
20 party".

21 **Q.** Thank you. It's to the Investigator, Fraud Operations,
22 Economic Crime Directorate; is that an individual who
23 you've been dealing with?

24 **A.** I think I've spoken with her once.

25 **Q.** If we scroll down, Fujitsu say as follows:

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1 **Q.** -- access to external providers, won't all of those
2 issues also have to be raised in a witness statement?

3 **A.** Yes.

4 **Q.** In light of that, is it likely, possible, that there
5 will be a successful conviction based on that, in your
6 view?

7 **A.** It would depend on what the reliability of the data is
8 on that particular matter because, obviously, if it
9 comes back as, oh, there was a bug error or defect or
10 power outage, or something like that, that affected the
11 reliability of the specific transactions that the police
12 are interested in, then no, that shouldn't go forward.

13 **Q.** Who's going to be able to work that out; who is going to
14 do the investigation as to whether there was a bug,
15 error or defect that did, in fact, impact on
16 a particular branch at a particular day?

17 **A.** So the police are asking Fujitsu to provide that
18 information. On this particular case as well, I'm aware
19 that once City of London Police have or had received
20 this information, in to the transaction level basis but
21 also the control environment, they were discussing with
22 us having an NCA-approved expert witness then look at
23 the system, but they wanted to look at the transactional
24 data first and the same with Lancashire Police.

25 **Q.** So is there a plan to have an external NCA witness,

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1 "As I understand it, the investigation is using data
2 from the Horizon system. During our discussions, the
3 City of London Police asked whether [Fujitsu] could
4 provide a statement regarding the reliability of the
5 current version of Horizon. As I hope was made clear in
6 our discussions, a witness statement from [Fujitsu]
7 attesting to the reliability or robustness of the
8 Horizon system and of data from it would amount to
9 expert opinion evidence. [Fujitsu] is unable to provide
10 expert opinion evidence in any legal proceedings in
11 relation to the Horizon system and the reliability of
12 its operation as it is neither independent nor does it
13 have sufficient information to provide such an opinion
14 at this time. Such a request has to be considered in
15 the light of the Inquiry."

16 Scrolling down, there's a section there on the
17 existence of bugs, errors and defects and remote access
18 powers. Fujitsu say:

19 "As discussed, the Horizon system has had and
20 continues to have bugs, errors and defects, some of
21 which may not have been detected at this time."

22 So there's the possibility of unknown errors:

23 "Accordingly, careful investigation is required to
24 ascertain whether bugs, errors and defects bugs, errors
25 and defects could that have operated to cause the

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1 accountancy discrepancies or transactions under
2 investigation. Further, [Fujitsu] notes that evidence
3 in the Inquiry has identified number of additional Post
4 Office and third party systems and business processes
5 (beyond the [Fujitsu] software) which also could or did
6 introduce shortfalls in branch accounts."

7 That's similar to the letter that we just looked at,
8 isn't it?

9 **A.** Yes.

10 **Q.** Over the page, please. It says:

11 "In general terms, remote access is the ability to
12 access the Horizon system from a location other than
13 a counter at the branch."

14 It sets out there remote access powers:

15 "Remote access powers enabling [Fujitsu] to access
16 and amend data affecting branch accounts have existed
17 and continue to exist within the Horizon system. The
18 use of such powers would need to be examined to
19 ascertain if they could potentially have caused or
20 affected the accounting discrepancies or transactions
21 under investigation.

22 "b) Systems and processes to be investigated ...

23 "It should be noted that the delivery of the current
24 Horizon system is reliant on the provision of services
25 by Post Office as well as third parties ..."

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1 anticipated", et cetera.

2 The letter does actually enclose, as an appendix,
3 a large amount of information -- and we'll scroll
4 through that shortly -- that is being provided to the
5 police in respect of their overall systems and
6 repositories, et cetera.

7 If we scroll down, please, to (f), the letter says:

8 "Production Order

9 "To the extent that the records described in this
10 letter and its appendices may assist the City of London
11 Police's investigations[, Fujitsu] respectfully suggests
12 that the City of London Police provides ... a production
13 order ... To ensure that the City of London Police
14 receives the data required within an achievable time
15 frame, [Fujitsu] would appreciate the opportunity to
16 review and comment upon [it]."

17 But they also say:

18 "In the meantime, in the interests of the
19 transparency and to assist the City of London Police's
20 understanding of the content of this letter and its
21 appendices, [Fujitsu] is prepared to provide the
22 documents footnoted in [that] letter ... on a voluntary
23 basis and unredacted form."

24 Perhaps we could just quickly scroll through the
25 appendix. That can be found at FUJ00243304. Thank you.

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1 Then it sets out there further complications in
2 respect of third parties:

3 "c) [Fujitsu's] provision of records for police
4 investigations

5 "Based on the evidence which has been seen and heard
6 in the Inquiry to date, [Fujitsu] considers that all of
7 the matters mentioned above would need to be carefully
8 investigated on a case-by-case basis with the assistance
9 of an independent IT expert, and possibly also forensic
10 accounting expert, to determine as best they can the
11 cause of branch account discrepancies or transactions
12 under investigation. [Fujitsu] considers that only
13 after such investigation has been undertaken could
14 a meaningful statement be made by an appropriate
15 independent IT expert regarding the reliability of the
16 Horizon system and the data it has produced at the
17 relevant branch in the relevant time frame.

18 "[Fujitsu] is of course prepared to cooperate with
19 the police and the criminal courts in the ways that it
20 can. We have discussed that Fujitsu retains various
21 Horizon system records which may facilitate your ongoing
22 investigations. I said that I would work with the team
23 within [Fujitsu] currently supporting the Horizon system
24 ... in order to produce a list of those records. This
25 exercise has proven more complex than I had

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1 We can quickly scroll through: various potentially
2 relevant records generated by the Horizon System are
3 being identified for the police.

4 What is your view of this letter and its contents?

5 **A.** So the issue around expert witness was raised in one of
6 their previous letters that I had seen before. I don't
7 agree -- Post Office doesn't agree, that it's an expert
8 witness, they're actually a witness of fact because what
9 they are being asked to provide is evidence of
10 particular transactions at particular times, and that's
11 it, together with a description of their Control
12 Framework -- is what I understand that the police would
13 like.

14 So the legal advice we've been provided, which
15 I agree with, is that that is not an expert witness
16 statement.

17 In terms of the material that they've pointed out,
18 great. That might assist City of London Police. Fully
19 understand why they would like a production order.
20 Again, don't have an issue with that.

21 **Q.** As a former police officer, what would you have made of
22 this, in respect of an ordinary theft case? So let's
23 say a £100,000-discrepancy has been identified --

24 **A.** Mm-hm.

25 **Q.** -- and you're presented with the keys to the warehouse,

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1 effectively, but no statement. What would you have made
2 of that?

3 **A.** The production order provides you the material, so you
4 can look through the material and then engage with the
5 witness, because that's what they are, and agree what
6 would go in a witness statement to produce the evidence
7 that the production order prompted. So that would be
8 the next stage.

9 **Q.** Do you feel that the police will be sufficiently
10 resourced, sufficiently interested, to actually pursue
11 those kinds of what may be called just an ordinary
12 criminal case?

13 **A.** This particular case?

14 **Q.** Any case that the Post Office considers sufficiently
15 serious to pass to the police?

16 **A.** So City of London Police consider themselves to be
17 a strategic police force, when it comes to fraud in
18 particular. They are also the lead force for fraud in
19 England and Wales and, when I spoke to who was their
20 Assistant Commissioner, he's now, I believe, the interim
21 Chief Constable -- Chief Commissioner, sorry -- he saw
22 the strategic nature of us being able to pass cases to
23 them. So although I think this is about
24 £300,000-something, actually, I think (1) that value is
25 significant but I think they would realise that this is

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1 system, if we could just bring up on to screen our
2 expert report, EXPG0000007. We've seen there it's
3 page 19 of that report, by way of example, identifies
4 current issues experienced by postmasters. Are these
5 results something that was surprising to you or not?

6 **A.** I didn't really have a frame of reference to compare
7 them to, if I'm honest.

8 **Q.** But if, for example, we say that 70 per cent have
9 experienced screen freezes; 68 per cent, loss of
10 connection; 57 per cent have experienced unexplained
11 discrepancies in the last 12 months; does that cause you
12 any concern at all?

13 **A.** Of the respondents?

14 **Q.** Yes.

15 **A.** Not 70 per cent of postmasters? Okay.

16 **Q.** Sorry, was that an answer or was that a question?

17 **A.** Sorry, that was -- probably should have kept that in my
18 head. I don't know because I don't have a frame of
19 reference.

20 **Q.** What do you mean by that?

21 **A.** Well, because I don't know the frequency because this --
22 the visibility of these events would, if they are
23 reported to Post Office, be within the Retail Team and
24 I wouldn't see that.

25 **Q.** But isn't that something you should be on top of if

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1 potentially a test case.

2 **Q.** But going forward, in terms of relatively routine police
3 prosecutions of cases where there are discrepancies and
4 in the Post Office view, that has been dishonestly
5 obtained, do you think, realistically, looking at, for
6 example, the letter that points to various bugs, errors
7 and defects, it also points out that there are third
8 party suppliers to Horizon, it points out issues of
9 remote access. Do you think, realistically, that's
10 going to lead to successful prosecutions?

11 **A.** So I think one of the outcomes of the scandal is that,
12 for all cases, irrespective of whether they're Post
13 Office derived, linked or otherwise, I think law
14 enforcement are going to have to do those verification
15 exercises, assurance exercises, on digital data, because
16 I think the scandal has shown that the assumption made,
17 that systems could be relied, upon has changed.
18 I remember when I first joined the police, there was no
19 natural assumption that a computer system was
20 functioning and workable, and we had to do what were
21 called system statements. And I think an outcome of the
22 scandal is that that's where law enforcement will end up
23 going back to. So I don't think it will be particular
24 to us.

25 **Q.** Looking at further issues relating to the Horizon

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1 you're investigating?

2 **A.** So on a case-by-case basis they would be looked at.

3 **Q.** I don't understand what "case-by-case basis" means. If
4 we scroll down --

5 **A.** Well, I can explain --

6 **Q.** Well, let's just have a look at what it says here then
7 perhaps you can explain in that context. It says:
8 "Among those that have experienced an issue in the
9 last 12 months, about two in three ... say that they
10 have experienced these issues on a monthly basis."
11 So we have there 65 per cent experiencing issues on
12 a monthly basis. If we scroll down, it says:
13 "This equates to about three in five (59%) of
14 [subpostmasters] surveyed."
15 Should you, in your position, not have a view on the
16 everyday experience of postmasters, irrespective of the
17 specific case?

18 **A.** Yes.

19 **Q.** Does that cause you any concern, in respect of matters
20 going forward in the prosecution of subpostmasters?

21 **A.** So I think that this underlines the requirement to take
22 each case that we take into my team, that we do
23 absolutely nail down that we're satisfied or not that --
24 whether or not the accuracy of the data is an issue that
25 should rule out or rule in that investigation.

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1 Q. How are you going to determine the accuracy of the data?
 2 A. So that's the process that we've previously described.
 3 Q. Will that involve close liaison with Fujitsu?
 4 A. Well, yes, if we're reporting a case to law enforcement,
 5 if they're willing to talk to us, or it will be close
 6 liaison with the police to help them understand the
 7 environment.
 8 Q. Could we please turn to FUJ00243299. I'm going to take
 9 you back to a document from December 2023. These are
 10 issues that were raised with the Post Office about the
 11 extension of the Horizon system. If we scroll down, we
 12 can see that Fujitsu raise a few issues. They say:
 13 "There are various challenges to the feasibility of
 14 the continued delivery of the Horizon system and
 15 associated services."
 16 Number 1, it says:
 17 "Due to the age and consequent end of service life
 18 status of the underpinning Horizon infrastructure there
 19 is an increasing risk of failure of the infrastructure
 20 that could result in adverse impact in the delivery of
 21 services to the public.
 22 "2. The technical complexity and risk associated
 23 with (i) updating infrastructure at varying states of
 24 obsolescence and compatibility, and (ii) delivering new
 25 system requirements, including because of lessons

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1 beyond 2030".
 2 Q. A number of years, you'll still have the Horizon system.
 3 We have those concerns that are raised by Fujitsu
 4 about the reliability of the current system.
 5 A. *(The witness nodded)*
 6 Q. We have further concerns raised about the ageing system.
 7 A. *(The witness nodded)*
 8 Q. We have the Inquiry's own survey of current
 9 subpostmasters.
 10 A. *(The witness nodded)*
 11 Q. Do you think it's realistic to expect any successful
 12 prosecutions based on Horizon data during that period?
 13 A. It would depend on the evidence related to each of those
 14 cases, and --
 15 Q. But what is your view --
 16 A. -- do remember that the -- I'm absolutely convinced that
 17 no police force will take forward to a prosecutor a case
 18 that solely relies on Horizon data, that there must be
 19 corroborative evidence because no one, rightly, should
 20 seek to rely entirely on Horizon.
 21 Q. I think your evidence earlier, in terms of the
 22 statistics, though, was that none of those cases had yet
 23 proceeded to a prosecution?
 24 A. Correct.
 25 Q. Looking forward, do you think there will be imminently,

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1 learned and commitments to end users. These activities
 2 are increasingly risky and technically challenging ..."
 3 Over the page, please.
 4 "In consequence, we strongly recommend that Post
 5 Office should continue to prioritise its objective of
 6 replacing Horizon and its associated services, as early
 7 as it can. Fujitsu will continue to support and
 8 facilitate orderly transition to an alternative solution
 9 ..."
 10 Have you given thought to the impact of the aging
 11 system on the reliability of the data and in respect of
 12 the evidence that you're going to have to give to the
 13 criminal courts?
 14 A. So we look at the individual branch, the individual
 15 transactions, and we have to assure ourselves that
 16 there's nothing there that suggests that that data can't
 17 be relied upon. Whether it was a brand new computer
 18 system or not, that same test needs to be applied.
 19 Q. Stepping back, though, and looking at all that
 20 correspondence that we've just been looking at, you're
 21 going to have Horizon for a number of years still to
 22 come, possibly 2030, possibly onwards -- is your view
 23 onwards, you look like --
 24 A. I think our Chairman is committed to 2028 but maybe
 25 2030 -- I think my eyebrows when you said "perhaps

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1 in the next year, the next two years --
 2 A. I think if Lancashire, in particular -- because that's
 3 the one I'm probably a bit closer to -- I think if they
 4 can satisfy themselves that the transactions that relate
 5 to their investigation are reliable, then I think that
 6 stands a good chance of going forward back to the CPS
 7 and that they may make a decision to proceed.
 8 Obviously, if the validation process that Lancashire
 9 carry out does not confirm that that data can be relied
 10 upon, then that's a different matter.
 11 Q. I'd like to move on to a different topic. I'll just
 12 address one short topic before we take our mid-afternoon
 13 break and that is the investigation into Mr Jacobs, the
 14 Subpostmaster Non-Executive Director. I'll look at
 15 number to different complaints about your team. Can we
 16 start by looking at WITN11180101. It's page 5, please.
 17 At the bottom of page 5, we have an email from
 18 Mr Morley, the Senior Investigations Manager within your
 19 team, to Mr Jacobs. He says:
 20 "I am employed by [Post Office] as Senior
 21 Investigations Manager ... and I have reason to conduct
 22 an investigation into alleged discrepancies at post
 23 offices within the Universal Office Equipment Group.
 24 I would now like to arrange to interview you in
 25 connection with the alleged discrepancies and to this

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1 end please can you provide your availability ..."

2 A reference there to an interview: Mr Jacobs is

3 a subpostmaster, the investigation is into the Universal

4 Office Equipment Group; is that or is that not

5 a proposal to interview a subpostmaster?

6 **A.** No, it's to interview a NED who happens to be

7 a postmaster.

8 **Q.** Is that such an easy distinction to make?

9 **A.** Well, the purpose of that investigation revolves

10 centrally around Elliot's status as a NED, that's the

11 purpose of the investigation.

12 **Q.** But the suggestion in that email is that it's

13 an investigation into alleged discrepancies at post

14 offices within his Post Office?

15 **A.** Yes, because the existence or not of any discrepancies

16 is central to the other elements, the principal

17 elements, of that investigation.

18 **Q.** Was Mr Jacobs suspected of having committed a crime?

19 **A.** No.

20 **Q.** Did you have any view as to whether, for example, the

21 build up of discrepancies was dishonest or not?

22 **A.** No.

23 **Q.** Can we scroll up, please. Mr Jacobs says:

24 "As I explained to [Mr Foat] I would be happy to

25 assist ... your enquiry."

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1 the postmaster.

2 **Q.** How can you not answer whether they would interview them

3 or not when you are providing the assurance for that

4 very team?

5 **A.** So we -- I accept your point from earlier today that we

6 need to look at that.

7 **Q.** This is your letter, it says:

8 "My name is John Bartlett. I am the Head of the

9 Central Investigation Unit ..."

10 You say:

11 "Andrew has been investigating shortfalls at post

12 office branches within the Universal Office Equipment

13 Group and has invited you to a voluntary investigative

14 meeting."

15 What is a "voluntary investigative meeting"?

16 **A.** It's effectively an interview.

17 **Q.** Again, are there issues within the department as to how

18 to describe an interview --

19 **A.** No, there's issues within Post Office as to how much

20 clarity we can use in our language; "victim" was another

21 one -- is another example of that, of fearfulness of

22 using clear language that people would understand

23 because it might attract an adverse comment.

24 **Q.** The shortfall that is alleged, as I've said,

25 approximately £200,000 originally alleged.

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1 If we scroll up, we have Mr Morley. He says:

2 "The interview will be conducted by myself and

3 [Mr Bartlett] who is the Head of the Post Office

4 Investigation Branch. Please find attached a letter

5 from John explaining in some detail the format of the

6 interview and the areas you wish to cover."

7 Can we please look at that letter. That's

8 WITN11180102. So is it your evidence that this

9 investigation would never now take place in respect of

10 an ordinary subpostmaster?

11 **A.** If they weren't a NED then it wouldn't be with us.

12 **Q.** When you say "with us", do you mean --

13 **A.** Well, a shortfall discussion or shortfall remedy or

14 investigation, however you want to characterise it, they

15 take place all the time in the Retail Team. So that's

16 why I didn't want to say it would never happen.

17 **Q.** I think we're again getting back to the discussion or

18 the interview point. If a subpostmaster, like the

19 evidence that is presented in this letter -- a £200,000

20 approximate shortfall, and the suggestion is that there

21 was a lack of, or stop in engagement with the relevant

22 team, would the Retail Team interview that person or not

23 interview that person?

24 **A.** I don't know. I think the PAST team, the Postmaster

25 Support Team would be the ones that would interact with

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1 The allegation was that he had stopped engaging, and

2 you say below that:

3 "We would like to circumstances with you this

4 mounting shortfall, understand what you think caused

5 them, and identify any reasons for not continuing to

6 engage with the PAST team."

7 Is it really your view that there was no suspicion

8 of criminal activity at that stage?

9 **A.** None had been raised with us.

10 **Q.** Let's say you had that discussion, you're having what's

11 described as an investigative meeting. Halfway through,

12 you form a view as to whether he is honest or dishonest;

13 what do you do?

14 **A.** Well, if we feel he's honest, we carry on. If we feel

15 that there is -- that we have formed a suspicion that

16 an offence may have happened, we would stop.

17 **Q.** Have you done that in cases?

18 **A.** We haven't needed to.

19 **Q.** Is there guidance about when to stop, how to stop --

20 **A.** Yes.

21 **Q.** -- what to say? Yes.

22 If we scroll down, when you say "yes", is that Post

23 Office guidance?

24 **A.** Should be in the manual.

25 **Q.** Conflicts of interest. If we scroll down, there are

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1 other allegations about conflicts of interest and
 2 directors declarations.
 3 **A.** Mm-hm.
 4 **Q.** If we scroll down, under "Conduct of the meeting", we
 5 have seen there that it's not an under-caution
 6 interview, and then there's discussion about audio
 7 recording and we'll come to discussion about that.
 8 If we go over the page, please, and scroll to the
 9 bottom, it says there:
 10 "Any decisions made based on this report, or any
 11 resulting non-investigative actions, falls outside the
 12 remit of the Investigation Team."
 13 Can you assist us with what is meant there?
 14 **A.** Yes, that means our job as investigators to collect
 15 information and evidence, and we pass it to decision
 16 makers.
 17 **Q.** Thank you. Could we please turn back to that email
 18 chain so that's WITN11180101, and if we could start at
 19 the bottom of page 3.
 20 We have seen in this correspondence a discussion
 21 between Mr Jacobs and Mr Morley about the provision of
 22 information.
 23 **A.** Mm-hm.
 24 **Q.** He says:
 25 "To begin, can you supply the 44-page PDF statement
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1 his view of events early, so we had a sample of the
 2 140-something emails that had been sent to Elliot by the
 3 PAST team.
 4 What was being suggested here was that they were all
 5 provided to Elliot and the simplest, best format and
 6 rooting would have been from them.
 7 **Q.** If you are investigating somebody and have a body of
 8 evidence and are making an allegation, would it not be
 9 more straightforward for you to be the team that
 10 provides that information?
 11 **A.** I think technologically wise, it was more effective for
 12 it to come from the PAST team.
 13 **Q.** If we scroll up, please, the discussion continues about
 14 the provision of information.
 15 Then, please, could we turn to WITN11180103, page 2.
 16 This is where things reach by 20 March 2023. Mr Jacobs
 17 says:
 18 "I await your proper and fully disclosures and will
 19 then take the matter under advisement.
 20 "In addition, you have provided a highlighted
 21 section of Board minutes -- can you please specify the
 22 accusation being made for the avoidance of doubt and the
 23 evidence on which you are relying in this regard?"
 24 If we scroll over, please. This is the response
 25 that we've already been through, and you'll be familiar
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1 in Excel format, broken down by branch", because it was
 2 quite difficult to understand.
 3 Scrolling down:
 4 "Please provide line detail, including the reason
 5 for each TC or BD ... so that it can be properly
 6 reviewed ...
 7 "Additionally the attached file cannot be accessed
 8 ...
 9 "Please also provide the [relevant] email address
 10 ..."
 11 If we scroll up, there is the response from
 12 Mr Morley. He says:
 13 "Can I respectfully suggest that you address the
 14 rest of your requests below to the postmaster support
 15 team as per their letters/emails sent to you at the time
 16 of the occurrence by PAST in which they offered to work
 17 with you to understand the discrepancy."
 18 So he has provided the relevant email address but,
 19 in terms of the remaining request, it seems he has
 20 directed Mr Jacobs to the PAST team; do you think that
 21 that is appropriate?
 22 **A.** So I think the reason that happened is that this was
 23 very -- we chose to engage with Elliot and ask his --
 24 get him involved in the discussion or, sorry, the --
 25 through an interview, engaged with Elliot to understand
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1 with, but I'll just read it out. Mr Morley says:
 2 "I do not intend to enter in pre-interview protected
 3 correspondence regarding advance disclosure which I am
 4 under no legal obligation to provide and is provided on
 5 this occasion out of courtesy in order that you can have
 6 a high level understanding of the topics we wish to
 7 cover, which are set out in the letter from Mr Bartlett.
 8 Further detail regarding [the Post Office's] concerns
 9 will be provided during the interview."
 10 Do you think that that is appropriate?
 11 **A.** Absolutely not.
 12 **Q.** "I am seeking in advance of the interview your agreement
 13 to the recording of the interview ..."
 14 Then he suggests, in effect, that if he doesn't
 15 agree to the recording of the interview it will be wise
 16 to allow six hours for that interview; do you think that
 17 is appropriate?
 18 **A.** I think it's factual, that it would be -- we were
 19 asking -- in order that people don't have to make highly
 20 detailed written notes, it would be -- if he willing,
 21 then we could have an audio recording made.
 22 **Q.** Would it really take six hours to interview or is that
 23 more of a threat?
 24 **A.** No, I don't think it was a threat.
 25 **Q.** Do you think, realistically, that interview would have
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1 taken six hours if it hadn't been recorded.
 2 **A.** I think the interview, as it stood, was over three hours
 3 anyway.
 4 **Q.** So it would have doubled in length?
 5 **A.** So it would have taken a lot more to make -- I think
 6 that is perhaps overegging it slightly, a cautious
 7 approximation.
 8 **Q.** Why is it your view that the first paragraph is not
 9 correct or not --
 10 **A.** That is not the tone that I want our team to use.
 11 I have raised it with him and he knows that that's not
 12 what we do.
 13 **Q.** He is your Senior Investigations Manager, he is one of
 14 your more senior staff.
 15 **A.** Yes.
 16 **Q.** We saw that earlier on. What was his response?
 17 **A.** He accepted that.
 18 **Q.** Are you aware that, after the interview, the Post Office
 19 auditors attended Mr Jacobs' premises?
 20 **A.** I believe it was a week later, yes.
 21 **Q.** What's your view of that, the approach that was taken?
 22 **A.** I think for the resolution of the shortfall issue, it --
 23 a count of stock and cash needed to be done.
 24 **Q.** Do you think that you gave in your letter sufficient
 25 information to Mr Jacobs, as to whether he was in any

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1 **Q.** Where do you say responsibility lies, who with?
 2 **A.** I would say the former Chairman and Nick Read.
 3 **Q.** That's Mr Staunton --
 4 **A.** Yes.
 5 **Q.** -- and Nick Read. Do you have any targets, completion
 6 targets --
 7 **A.** No.
 8 **Q.** -- in your team? Do you think it might be appropriate
 9 to have some sort of target as to when people are
 10 notified of the closure of investigation?
 11 **A.** So I think it's reasonable to have a completion of
 12 investigation target but, where the output of that
 13 investigation goes, is out of our control, then that
 14 would be a false target that we wouldn't be able to keep
 15 to because we have no control over it.

16 **MR BLAKE:** Thank you.

17 Sir, that might be an appropriate moment to take our
 18 mid-afternoon break.

19 **SIR WYN WILLIAMS:** Yes, certainly. But can I just ask one
 20 or two process questions about the Horizon reliability
 21 issue, which you've examined at significant and proper
 22 length, if I may say so.

23 But I just want to understand one or two things
 24 while they're fresh in my mind, all right, Mr Bartlett.

25 The first thing is this, this is me just dotting the

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1 way suspected of something criminal, or what kind of
 2 an interview it was?

3 **A.** Yes.

4 **Q.** Can we turn, please, to WITN11180104. That
 5 correspondence we were just looking at is in March 2023.
 6 We now get to February 2024, so almost a year later,
 7 where we have a letter from you to Mr Jacobs, saying,
 8 "As you're aware, the Assurance & Complex Investigation
 9 Team conducted a fact-finding investigation ... with
 10 your assistance", and essentially, the matter was
 11 closed.

12 Do you think that is a reasonable time in which to
 13 give Mr Jacobs a final closure on his investigation?

14 **A.** No, I don't, but I can explain why I don't.

15 **Q.** Please do.

16 **A.** So it isn't right it took that long but, if you look at
 17 the date -- and I'm afraid I can't recall it -- that we
 18 submitted the two investigation reports, the final
 19 investigation report and, by the time Mel Park submitted
 20 her report, they then sat with the Chairman and the CEO
 21 for a very, very long time. We had no explanation
 22 provided to us as to what they were doing with the
 23 investigation reports, despite us chasing, and we
 24 couldn't issue a closure letter until we knew what the
 25 outcome was.

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1 Is: I take it that the City of London Police
 2 investigation which is the subject of correspondence
 3 between Fujitsu and the Post Office is the City of
 4 London case mentioned in your schedule?

5 **A.** Yes, sir.

6 **SIR WYN WILLIAMS:** So that case was referred to the police
 7 in October 2022, according to your schedule, yes?

8 **A.** If that is on the schedule, sir, yes.

9 **SIR WYN WILLIAMS:** I think I've got it right, yes. The
 10 Lancashire one was 14 September 2022, and I believe the
 11 City of London Police came shortly after afterwards.
 12 But, in any event, that case has been ongoing in the
 13 sense of being alive now for approximately two years, if
 14 I'm right in my reading of your schedule?

15 **A.** That appears to be the case, sir.

16 **SIR WYN WILLIAMS:** It got to the point in 2024, earlier this
 17 year, where, if not expressly, the indication was that
 18 the City of London Police weren't going to take it any
 19 further without a lot more information; is that a fair
 20 summary?

21 **A.** Without a lot more information and evidence, yes, sir.

22 **SIR WYN WILLIAMS:** Sure. So you have resolved, ie Post
 23 Office -- and I'm choosing my words reasonably
 24 carefully, so I'll start again.

25 Is it correct that Post Office Limited has resolved

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1 to provide a witness statement to the City of London
2 Police about this case, or is it a case that events have
3 been put in hand for Mr Oldnall to make a statement but
4 a decision as to whether to submit it to the police has
5 yet to be made?

6 **A.** So a draft witness statement from Mr Oldnall has been
7 produced, it needs to be finalised, which he wanted to
8 do after giving evidence here.

9 **SIR WYN WILLIAMS:** Yes.

10 **A.** And then SEG -- so the Strategic Executive Group -- and
11 no doubt Board would like to consider that witness
12 statement because of its significance.

13 **SIR WYN WILLIAMS:** That's what I wanted to flush out.
14 I appreciate this is just a summary, where you say in
15 your appendix, that police have requested a statement
16 regarding robustness of Horizon, POL are producing
17 a statement, what you actually mean -- and I'm not
18 saying this in a critical sense -- is that certain
19 employees of the Post Office have put in hand the making
20 of a statement, but it is yet to be decided whether or
21 not that will be submitted to the police.

22 **A.** That's correct, sir.

23 **SIR WYN WILLIAMS:** Fine. Can you give me some kind of
24 timescale for that?

25 **A.** So Post Office is committed to provide, if authorised
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1 **A.** Yes, sir.

2 **SIR WYN WILLIAMS:** Right. Thank you very much. So we'll
3 resume a bit later than you anticipated, Mr Blake, yes?

4 **MR BLAKE:** It makes it more of a round number sir, actually.
5 3.45, please.

6 **SIR WYN WILLIAMS:** All right, fine.

7 (3.33 pm)

8 (A short break)

9 (3.45 pm)

10 **MR BLAKE:** Moving on to Project Pineapple and Saf Ismail.
11 Could we please bring up onto screen POL00448302. This
12 is the well-known Project Pineapple email on page 4 of
13 that document. If we could turn to page 4. If we
14 scroll down slightly, the note of the discussion with
15 Mr Ismail and Mr Jacobs, it says:

16 "Equally Saf and Elliot are FED UP WITH THE AMOUNT
17 OF POWER WIELDED, BY FOAT. He and other members to
18 senior team act as if PMs ARE GUILTY UNTIL PROVED
19 INNOCENT ... 'No one believes us' is a constant refrain
20 from PMs. WHILST FOAT IS AT THE HELM NOTHING WILL
21 CHANGE. We must also part company with all those
22 investigators who behaved so terribly with PMs. What on
23 earth is happening if Steve Bradshaw is still with us --
24 his performance at the Inquiry was a disgrace and
25 reflected terribly on Post Office. Foat uses his
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1 to, that witness statement to Lancashire Police by the
2 end of next month.

3 **SIR WYN WILLIAMS:** So Lancashire first and there is a time
4 commitment with them?

5 **A.** Yes.

6 **SIR WYN WILLIAMS:** Right. The last question and then we'll
7 have our break.

8 My impression from your evidence about seeking to
9 establish the reliability of Horizon in each particular
10 case is that, although Post Office can go so far in
11 providing evidence to establish reliability, it is also
12 necessary that additional evidence is given, either by
13 Fujitsu, and/or by an independent expert; is that your
14 understanding?

15 **A.** I'd say both are required, sir.

16 **SIR WYN WILLIAMS:** Both. So in order for there to be any
17 prosecution, in truth, because the five cases that we
18 have outstanding saying that you are going to produce
19 a statement, according to the schedule, in order to
20 bring an investigation to a sufficient point that it can
21 be submitted to the prosecuting authorities, ie the CPS,
22 if it's England and Wales, there would have to be
23 witness statements and supporting exhibits from Post
24 Office Limited, Fujitsu Services Limited, and then
25 an appraisal by an independent expert?
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1 leadership of the Inquiry Team as an instrument of his
2 power -- it all has to stop. The PM 'is not the enemy',
3 'Only PMs can solve this' and tell us how to change."

4 Here is a reference to you:

5 "JB is an ex-policeman. His behaviour has been
6 unacceptable and he needs to move on to prove we have
7 changed."

8 Were you aware of this at the time?

9 **A.** No.

10 **Q.** When did you first become aware of this allegation?

11 **A.** It was raised to me by Ben Foat. Once he received
12 whatever he received, he mentioned that to me.

13 **Q.** What is your view of what is said there?

14 **A.** I don't know what they're alluding to.

15 **Q.** Can I just ask, in terms of Mr Foat, it has been
16 suggested by at least one witness that Mr Foat wasn't
17 responsible for your team; is that right or wrong,
18 because we saw the organogram and it looked as though
19 Mr Foat was, at that particular, time responsible?

20 **A.** So Sarah Gray reported into him and I reported into
21 Sarah Gray.

22 **Q.** So, insofar as it addresses his responsibility, that is
23 correct?

24 **A.** Absolutely.

25 **Q.** Thank you. We've spoken about the various policies and
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1 the changes in the group policy. Has that had input
 2 from subpostmasters?
 3 **A.** The combined one has had input from the Postmaster
 4 Experience Director.
 5 **Q.** Has it had, for example, input from the NFSP or the
 6 Voice of the Postmaster; have they been invited to make
 7 any comment?
 8 **A.** So we have talked to the NFSP, primarily around Speak Up
 9 but, obviously, connected to Speak Up are investigations
 10 from that and, in terms of how we conduct
 11 investigations, the Speak Up manager meets with the NFSP
 12 every week where they talk about investigations. I've
 13 attended those meetings on occasion and we've talked
 14 about our approach to investigations, and the feedback
 15 we've received is that it's supportive of our approach,
 16 to the extent -- sorry, to follow that up, to the extent
 17 that we have had cases referred to us by the NFSP, for
 18 us to deal with.
 19 **Q.** But in terms of the policy that is not yet finalised, is
 20 there any plan for any more involvement of
 21 subpostmasters, whether it be via the NFSP, via the
 22 Non-Executive Directors or some other --
 23 **A.** Yes, so the NFSP we would like to have look at it and
 24 provide an input.
 25 **Q.** Could we please turn to POL00446706. This is feedback

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1 **A.** So if there are colleagues that feel this way, I'd like
 2 to understand why and see what we can do to change if we
 3 need to.
 4 **Q.** Prior to being shown that by the Inquiry, had those
 5 concerns been drawn to your attention at all?
 6 **A.** No.
 7 **Q.** Project May, you've provided a separate witness
 8 statement on. That's the project relating to the race
 9 identity codes?
 10 **A.** Yes.
 11 **Q.** That was first commissioned on 30 May 2023, the final
 12 report was 8 February 2024. You've addressed it in your
 13 statement, and the background. Am I right to summarise
 14 that those codes are likely to have originated from
 15 Royal Mail Group before the split?
 16 **A.** Yes.
 17 **Q.** Has the Post Office established the actual origins of
 18 how the racist terminology came to be used?
 19 **A.** As in an individual?
 20 **Q.** How it first came to be formulated within the Royal Mail
 21 Group?
 22 **A.** Well, what we know is that someone within the
 23 investigations section within Royal Mail Group created
 24 that document but we don't know who.
 25 **Q.** An external company called ETICA has been involved.

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1 from an anonymous survey at the Post Office. It's not
 2 an Inquiry-led survey; it's from the Post Office. I'm
 3 going to just take you to two lines from it and ask your
 4 view. The first is 1461. It says:
 5 "Teams could work better with each other such as
 6 A&CI as they do not take on feedback and assume their
 7 way of working is correct without having the knowledge
 8 to back it up so come across as non-transparent and
 9 belittling."
 10 Then 1494, it says:
 11 "Overall there is great teamwork and cooperation
 12 between departments, however the A&CI team can at times
 13 come across the aggressive, refuse to accept feedback,
 14 and can work in isolation not understanding our ways of
 15 working/policies."
 16 Are those complaints that you recognise, not as per
 17 the individual who made them, but simply are they
 18 concerns that you are aware of?
 19 **A.** No.
 20 **Q.** What is your view of them?
 21 **A.** It's a bit worrying, if that's how -- was this from
 22 a colleague survey --
 23 **Q.** Yes.
 24 **A.** -- as opposed to a postmaster survey?
 25 **Q.** Yes, I believe so.

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1 Very briefly, what is their involvement?
 2 **A.** They're a non-government organisation that are -- they
 3 support organisations like the International Criminal
 4 Court and human rights activities in terms of ethical
 5 investigation.
 6 **Q.** The report was produced on 1 March 2024. One of their
 7 recommendations was annual training on unconscious
 8 bias --
 9 **A.** *(The witness nodded)*
 10 **Q.** -- and also regular training to remain up-to-date with
 11 best practice.
 12 **A.** Mm-hm.
 13 **Q.** Again, is this is an area of training that is not yet
 14 finalised?
 15 **A.** So we're hoping this will form part of the provision
 16 from the College of Policing.
 17 **Q.** Thank you. So, again, as we discussed earlier today --
 18 **A.** It's imminent.
 19 **Q.** Imminent. There was originally going to be Part 2 of
 20 Project May. Very briefly, what was the plan for
 21 Project 2 and what has happened to it?
 22 **A.** So originally we hoped that an organisation like ETICA
 23 would look at a large sample of historic investigations,
 24 so those that are pertinent to this Inquiry, with a view
 25 of using various scientific and academic methods to

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1 review a large number of cases to see if they could
2 determine whether there was any conscious or unconscious
3 bias in decision making, particularly around the raising
4 of cases, the decision to prosecute, or acceptance of
5 payment via the contract enforcement.

6 **Q.** Why is that not taking place?

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

8 **Q.** Who is responsible for deciding whether it takes place
9 or not?

10 **A.** Nick Read made the decision to change Phase 2.

11 **Q.** What did he change it to?

12 **A.** So it's now -- it looks like it's going to be the
13 establishment of a focus or consultative group within
14 Post Office as to the use of language and approaches
15 that take into account difference from an EDI
16 perspective in relation to investigations.

17 **Q.** So is it now forward looking, rather than backward
18 looking?

19 **A.** Absolutely.

20 **Q.** At paragraph 20 of your statement, you've said that your
21 team has purposely removed fields which would capture
22 demographic data on --

23 **A.** Yes.

24 **Q.** -- the case management system. Might that cause issues
25 with not actually being now able to monitor, for

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1 2024. I'm only taking you to that because it provides
2 a helpful summary of where things were at by this stage
3 and it's page 2. The bottom of the second paragraph
4 sets out various categories of investigations. Current
5 roles is not part of your remit, is it?

6 **A.** No.

7 **Q.** Right. In terms of Project Phoenix, it says:

8 "The third category included and expanded upon the
9 scope of Project Phoenix and would focus on addressing
10 any misconduct allegations arising against current
11 employees as a result of evidence given at the Inquiry
12 in later Phases, in addition to the evidence provided at
13 the Human Impact Hearings."

14 Are you aware of when Project Phoenix was first
15 established; was that related to the Human Impact
16 Hearings?

17 **A.** Directly.

18 **Q.** Why is it that the Post Office, in your view hadn't
19 started looking into the historic conduct of its
20 employees before the Human Impact Hearings?

21 **A.** I don't know for sure but my impression, which I think
22 I maybe mentioned this morning, is that that sort of
23 understanding was expected to come out of the Inquiry
24 itself but I think it demonstrated a lack of curiosity
25 on behalf of the organisation to learn by itself.

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1 example, disproportionate impact or disproportionate
2 numbers of investigations into certain ethnic groups?

3 **A.** Potentially. But the more prominent issue is that it's
4 not felt that we are required to collate that data, but
5 I take your point. I think it's a trade-off between
6 people not being comfortable with their ethnicity being
7 recorded, but the value to an organisation in capturing
8 that data.

9 **Q.** Are you aware, for example, that the Inquiry sought
10 subpostmaster demographic information in advance of its
11 survey but, in fact, the Post Office doesn't hold that
12 kind of data in respect of the subpostmaster population?

13 **A.** No, I wasn't aware.

14 **Q.** There's been some evidence in previous phases, for
15 example, relating to the Helpdesk, where negative
16 assumptions were made about certain ethnic groups. How
17 does that failure to collect that kind of data impact on
18 your ability to monitor those kinds of things?

19 **A.** We have a very small caseload, so we will know who's
20 connected to that caseload. So we could recreate that
21 if needed. But within Post Office in relation to
22 Project May, there was a very strong upsurge of opinion
23 that the collation of ethnic data was an issue.

24 **Q.** Moving on to Project Phoenix, could we please turn to
25 POL00448649. These are the Board minutes of 29 April

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1 **Q.** In terms of that investigation, Phoenix, that's carried
2 out by a team that's within your division?

3 **A.** Yes.

4 **Q.** Was any thought given to whether an internal group of
5 investigators was appropriate to be, for example,
6 liaising directly with subpostmasters?

7 **A.** So they're not internal in the sense that they were
8 existing members of the team. They weren't. They were
9 recruited specifically to do this, and they only do
10 matters relating to the Inquiry. So they don't do
11 business as usual work.

12 **Q.** What's your view on the proposal that individuals should
13 be suspended whilst they're being investigated in
14 respect of Project Phoenix?

15 **A.** I think the appropriate policies have to be applied.

16 **Q.** What do you mean by that?

17 **A.** So there are policies -- ER-owned policies that have to
18 be applied in terms of misconduct issues and they've got
19 to be applied.

20 **Q.** There's been a thematic report that has been produced in
21 respect of Project Phoenix. That can be found at
22 POL00458007. That was completed on 28 August of this
23 year. We'll skip through this relatively quickly
24 because everybody has it and it can be considered in due
25 course. Over the page, please, to page 2. There are

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1 a number of failings that were identified in this
2 thematic report; is that right?
3 **A.** Correct.
4 **Q.** Can you broadly summarise the findings there?
5 **A.** So I think bullet point three identifies five key
6 themes: so quality and application of investigations --
7 of investigative activity is one; recordkeeping; the
8 recruitment and training of investigators; separation of
9 function, so that's between those conducting criminal
10 investigations and those that were conducting contract
11 advising or contract resolution issues; and then there's
12 themes around poor conduct of Post Office staff.

13 **Q.** If we could turn to the conduct of Post Office staff,
14 and that's on page 3, please. A number of issues were
15 raised in terms of the investigation, in terms of
16 compliance with legal obligations, et cetera, but I'm
17 just going to focus on this particular section. It
18 says:

19 "A range of issues were raised in the Human Impact
20 evidence and was the main driver for the initiation of
21 Project Phoenix. Some allegations have been disproved
22 with factual evidence obtained by the Phoenix team but
23 there have also been matters relating to current [Post
24 Office] employees that have been referred for code of
25 conduct investigations by the Employee Relations team
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1 is available and then make observations, findings and
2 recommendations.

3 So they do that, they produce what is called
4 a merits assessment -- which we have shared all of them
5 that we have completed through the panel so far with the
6 Inquiry -- they then go to the panel, and there could
7 be, and there have been, recommendations in there of the
8 nature that are described there. And that's when
9 employment policies would kick in, at that point.

10 **Q.** "Review" sounds perhaps quicker and more achievable than
11 an investigation. Why has it taken so long?

12 **A.** The appalling state of Post Office's databases -- data
13 systems. Going back that far, it is -- well, if you've
14 read any of the merits assessments you'll see that the
15 team that complete them put in there that there was
16 an expectation that when they started they would
17 literally be handed a case file and related papers for
18 them to review. That has absolutely not been the case.

19 So there's 5.4 million documents that are
20 potentially in play, and the way I try and explain it --
21 because everyone asks why has it taken so long. The way
22 I explain it is: you should be able to go to a filing
23 cabinet, find a file, take it out, whether that's
24 electronic or physical.

25 The way I tried to describe it is: imagine room with
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1 that are currently ongoing.

2 "Matters of a potential criminal nature have also
3 been identified and with Panel approval and submission
4 through the [Post Office] Cooperation with Law
5 Enforcement Policy, have been passed to the Metropolitan
6 Police Service for their consideration.

7 "Although the prosecution aspect of the reviewed
8 cases was not covered by the terms of reference for
9 Project Phoenix there have been matters identified by
10 the review team that have met with panel approval for
11 referral to the Solicitors Regulation Authority and
12 MPS."

13 Are we to understand that Phoenix conducts its
14 investigation, waits for that investigation to conclude
15 and then, in cases, for example, that are employment
16 matters, then passes it on to the Employee Relations
17 Team to conduct another investigation?

18 **A.** So I think some clarity over language is useful.

19 **Q.** Yes.

20 **A.** So the Project Phoenix team conducts reviews, not
21 investigations. Again, I think that might be something
22 we could talk about for some time, but the reason for
23 saying "review" is that they don't reinvestigate the
24 original allegations made against the postmasters or
25 their staff. What they do is review the material that
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1 5.4 million documents in but they've just been thrown in
2 there, there is no index, no description, you have to
3 search through each of those documents to try to find
4 it.

5 **Q.** Are we now to expect that matters have been passed in
6 certain cases to the Employee Relations Team or the
7 police who are then, as you've only carried out
8 a review, then going to have to investigate and, if so,
9 what do you expect the timelines to be?

10 **A.** So I don't know about the police investigation because
11 obviously that's out our control and we don't know what
12 other evidence they have, but we actively cooperate with
13 them, and pass -- and make referrals proactively to them
14 where we have concerns, and then they take it from
15 there. We're in the process of agreeing how we can pass
16 them the material that's been collected, so they don't
17 have to repeat that process.

18 And with the employment relations type HR type
19 investigations, at the moment we're trying to work out
20 with the police how those two functions interact and we
21 will be guided by the police -- Post Office will be
22 guided by the police.

23 **Q.** Thank you. I'd just like to provide updates on two
24 other investigations. The first is Project Willow. Can
25 you assist us briefly with where things stand with that?
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1 A. So there are three Project Willows, which one --
 2 Q. Can you assist us with all of them, as quickly as you
 3 can.
 4 A. Okay, so Project Willow was an investigation to test
 5 whether someone who believed that they were a PIDA
 6 qualifying whistleblower had received detriment. So
 7 that's that investigation. That's closed.
 8 Willow2 is an investigation in relation to NBIT, and
 9 there are two particular themes in there. One is that
 10 senior decision makers, so CEO and SEG, were provided
 11 with selective information in order to make decisions.
 12 That is currently open and is being investigated
 13 externally -- by an external organisation, one of the
 14 law firms and accountancy firms.
 15 The second part of that is that -- I think you
 16 mentioned it to Chris Brocklesby, which is that the
 17 information security elements, some relating to the NBIT
 18 build, were deliberately deactivated in order to --
 19 Q. What is the status of that?
 20 A. So that is also being dealt with by the same
 21 investigation team externally.
 22 Project Willow3 is a newer allegation, and that
 23 relates to whether a potential supplier that could
 24 assist with various elements of delivery of NBIT process
 25 was properly briefed to the Board or whether that was

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1 many questioners are there?
 2 MR BLAKE: There are three. Mr Stein proposes to be first
 3 and the longest but he will be ten minutes.
 4 The other two questioners are no more than five
 5 minutes each.
 6 SIR WYN WILLIAMS: Right, well, I'm going to make it easy
 7 for everyone by saying that it is now 4.10, and
 8 I propose to sit no later than 4.40, all right? So I'll
 9 allow a little latitude because I don't want to rush
 10 people but I'm not going to sit beyond 4.40. So between
 11 the three of you, you'll have to work it out, as they
 12 say.
 13 MR BLAKE: Thank you, sir.
 14 Mr Stein?
 15 **Questioned by MR STEIN**
 16 MR STEIN: Thank you, sir, I have my watch by me which is,
 17 you know, always a very reliable judge of my timings.
 18 The questions I have for you, Mr Bartlett, come from
 19 the direction of obviously a very large group of people
 20 that have been badly affected by the scandal but the
 21 group of people I represent also includes current
 22 subpostmasters; do you understand?
 23 A. *(No audible answer)*
 24 Q. Now, you have been asked number of questions by Mr Blake
 25 about NBIT and what is happening --

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1 skewed, and that is underway.
 2 Q. Nearing completion or just underway?
 3 A. That investigation had to be paused because, for speed
 4 purposes, we chose to use the same team to conduct the
 5 investigation around Saf Ismail that recently surfaced
 6 and that you are aware of. So that team has completed
 7 that investigation and now they are back on Willow3.
 8 Q. Finally, Project Acer, can you give us an update as to
 9 first of all, in very overview terms, what that is and
 10 where it's up to?
 11 A. Sure. So Project Acer is an allegation that came up
 12 through the Speak Up service function that an individual
 13 within Post Office had instructed their team to destroy
 14 or otherwise remove material that might be of value to
 15 the Inquiry. We told the Inquiry about it, you informed
 16 the Met Police about it; it is now a Met Police
 17 investigation.
 18 Q. Just for clarity's sake, it doesn't involve a witness in
 19 Phase 7?
 20 A. No.
 21 MR BLAKE: Thank you.
 22 Sir, those are all of my questions. There are some
 23 questions from Core Participants. We have discussed
 24 orders and timings.
 25 SIR WYN WILLIAMS: Well, I mean, let's be realistic. How

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1 A. Yes.
 2 Q. -- and you've provided some more recent information.
 3 You address that in your statement. I don't need to go
 4 to it because I'm just referring to the fact that you're
 5 talking about NBIT. So, for your purposes, it's within
 6 your statement, Mr Bartlett, it is page 15,
 7 paragraph 25. What you're saying there is that on
 8 28 June 2023, the GE agreed that A&CI priorities for the
 9 financial years 23/24, 24/25, would be, and then you
 10 give an order of priority.
 11 Then the fourth order of priority, therefore, at (d)
 12 was preparing for transition of the network to New
 13 Branch IT System, NBIT. Okay?
 14 Then slightly further down you start to talk about
 15 the fact that work on NBIT is delayed because,
 16 essentially, the landscape is not sufficiently developed
 17 to require this work.
 18 A. *(The witness nodded)*
 19 Q. All right. So we understand and just hopefully you'll
 20 agree with me that your work that was proposed for NBIT
 21 was put on hold pending more development, more
 22 information?
 23 A. Correct.
 24 Q. Okay. Now, your statement, which contains those
 25 references, is dated 22 August of this year. Yes?

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1 A. Yes.

2 Q. Okay. Now, since that time, we have heard from
3 Mr Railton, the new Chair of Post Office, who I think
4 towards the end of his evidence was talking about
5 whether NBIT is really a very good idea or not, and was
6 wondering whether, in fact, it was a poor idea. That
7 was information that presumably you are aware of and
8 heard?

9 A. No.

10 Q. Okay. Well, in the magazine Computer Weekly, which has
11 been an integral part of the background to the
12 development of this scandal, they are a news
13 organisation that were one of the principal
14 organisations that actually broke the scandal in the
15 press. Now, they've been setting out the fact that they
16 have hold of information, internal Post Office document,
17 from the new Acting CEO, Neil Brocklehurst, revealing
18 that:

19 "While the strategic review is ongoing and informed
20 by other discussions with the Board and stakeholders, we
21 have taken the opportunity to review our current
22 approach to our delivery of new technology to make sure
23 it will deliver what postmasters need in the most
24 effective way possible."

25 Then goes on to say this:

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1 Q. Right. Nobody has been identified?

2 A. Er --

3 Q. As to the skewer?

4 A. There have been allegations made and the external
5 investigators are seeking to corroborate or otherwise
6 that.

7 Q. The person that is doing the skewing, is that
8 an important person within the organisation?

9 A. Potentially but the -- there are also a number of people
10 who have left the organisation that that might also
11 relate to.

12 Q. Are you able to provide the name of the person that is
13 the suspect for the skewing?

14 A. That would depend on what the Chair is --

15 Q. What is the name of the person that's doing the skewing?

16 MR BLAKE: Mr Stein --

17 SIR WYN WILLIAMS: I don't think he need answer that.

18 MR STEIN: Right, okay. I'll change subjects because it
19 sounds like that's a developing situation, Mr Bartlett.

20 We also have a new statement from Mr Patterson.
21 Mr Patterson is the European Director of Fujitsu. Okay?
22 Mr Patterson has given evidence in the Inquiry and has
23 provided a statement, again, demonstrating things are
24 among on, that is dated 23 September 2024. He says this
25 in relation to police requests:

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1 "This means from next week we will start reassessing
2 and reprioritising the NBIT programme."

3 Now, is that a document that you're aware of,
4 an internal Post Office document, from the Acting CEO,
5 Neil Brocklehurst, saying, essentially, the Post Office
6 is going to start reassessing and reprioritising?

7 A. I'm aware that they're reassessing and reprioritising.

8 Q. So the question of NBIT and what is going to happen with
9 it does seem to be under fairly close examination within
10 the Post Office; that seems to be where we're at?

11 A. Yes.

12 Q. It doesn't seem at all certain that it's likely to go
13 ahead. Again, that seems to be where we're at; do you
14 agree?

15 A. I have heard those things but I'm not closely associated
16 to it because it's a technology process.

17 Q. You have had discussed with the Mr Blake towards the end
18 of the questions, he asked you Willows -- I think it's
19 Willow2 3, and 4, I wasn't certain --

20 A. No.

21 Q. Willow2 and 3?

22 A. Willow2 and 3 relate to NBIT.

23 Q. You were talking about information that has been skewed.
24 Can you help us, who is doing the skewing?

25 A. That's the purpose of the investigation.

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1 "Fujitsu has informed the relevant police forces and
2 POL that, whilst Fujitsu is willing to cooperate with
3 the investigations through the provision of documentary
4 records, Fujitsu is not in a position to provide the
5 witness statements requested. Fujitsu is of the view
6 that such witness statements will amount to expert
7 opinion evidence, which Fujitsu cannot provide on the
8 basis that Fujitsu is not independent (amongst other
9 reasons). Fujitsu has made clear to POL that
10 discussions regarding these investigations are
11 confidential as between Fujitsu and relevant police
12 forces."

13 Then it goes on to say:

14 "It became apparent to Fujitsu, through the police
15 requests, that the views of POL and Fujitsu, with
16 respect to the use of Horizon data in enforcement action
17 against postmasters and branch staff, are fundamentally
18 different."

19 Okay?

20 A. Okay.

21 Q. So if we trace through the questions that Mr Blake was
22 asking you earlier, from December 2023, Fujitsu was
23 describing the system as being obsolescent, old, patched
24 up, constant needing for repairs?

25 A. *(The witness nodded)*

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1 Q. You've then seen other correspondence talking about the
2 fact of current BEDs that they know about and others
3 that they don't know about. Yes?

4 A. Yes.

5 Q. You've then heard from me, reading part of
6 Mr Patterson's statement recently provided to this
7 Inquiry, saying that Fujitsu, frankly, are not prepared
8 to provide any statements to support the system. They
9 are just not doing it, Mr Bartlett.

10 A. Well, they have responded to a production order, or are
11 intending to, and that will be followed up with
12 a witness statement in order to produce that evidence.

13 I would also challenge their assertion that they are
14 an expert witness. In my opinion and legal advice that
15 we have received is they are not an expert witness.

16 Q. I'm going to come to that. Now, the position between
17 Fujitsu and the Post Office does seem to be rather at
18 odds. We've had now this whole series of
19 correspondence, starting with December 2023, right the
20 way through to only a few days ago, essentially, saying
21 that Fujitsu and the Post Office have very serious
22 disagreement between their stance on these matters.

23 A. Yes.

24 Q. That's at the very least --

25 A. I think that's fair.

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1 A. Mm-hm.

2 Q. You've also said in your evidence that "because the POL
3 Senior Executive and Directors Board haven't said it's
4 unreliable, we will assume it's reliable". So you're
5 working on the basis of two negative assumptions, aren't
6 you, Mr Bartlett?

7 A. And then the next step is that the police, to
8 an evidential standard, test those transactions in the
9 system.

10 Q. Right. We've now got evidence, in relation to your
11 statement, of ongoing investigations. You describe one
12 as being some sort of test case that you're thinking
13 about, yes?

14 A. I'm not sure --

15 Q. Lancashire or the City?

16 A. I think that's likely to be the first case.

17 Q. Right, okay.

18 Now, we can see, at the back of your statements, a
19 schedule that relates to those investigations --

20 A. Mm-hm.

21 Q. -- and, indeed, the individuals being investigated can
22 identify their own cases, can't they, because they've
23 got the numbers, the figures for each case?

24 A. Yeah.

25 Q. Right. Have those investigation teams, for each one of

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1 Q. Yes, that's at the very least what we've got. Okay?

2 So it does seem as though Fujitsu may have slightly
3 different advice in relation to the provision of
4 statements than you've got. Who has your advice been
5 given by?

6 A. I don't know. It was external counsel but I don't know
7 the name of --

8 Q. Have you seen written advice?

9 A. I've seen a summary of that written advice.

10 Q. Right. So the position in relation to Fujitsu appears
11 to be that they're not prepared to provide any expert
12 evidence at all, from their point of view, in relation
13 to the operation of the system. It also seems to be
14 they're saying the system is old, it's out of date, it
15 needs a lot of work, it needs a lot of support and there
16 are bugs in the system. It doesn't seem as though
17 they're particularly keen on saying, "There's no
18 problems in the system, we'll provide a statement to say
19 that it's okay". It doesn't seem that way, does it,
20 Mr Bartlett?

21 A. That's what they are not being asked for. They're being
22 asked around specific transactions --

23 Q. Well, hang on, Mr Bartlett. You said in your evidence
24 that "because Fujitsu haven't said that it's unreliable,
25 we are therefore prepared to assume it is reliable"?

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1 the police forces involved, been given all of the
2 correspondence that you've had questions asked by
3 Mr Blake about? Have they been given all that
4 correspondence?

5 A. So we've discussed with Lancashire some of that
6 correspondence since those letters have come in, and
7 we've made them aware of it, and they're still engaging
8 with Fujitsu, as I understand. As the next cases come
9 up, then we will talk to them about that too. We will
10 make everything available to them and we will share it
11 as they would like.

12 Q. That's Lancashire. City?

13 A. I haven't spoken to City for some time.

14 Q. Given that on 17 May 2024, Mr Patterson was expressing
15 very strong reservations about the use of data from
16 Fujitsu in relation to investigations --

17 A. Mm-hm.

18 Q. -- why wasn't that immediately provided to the police
19 forces that were conducting these ongoing
20 investigations?

21 A. My -- the interpretation of the letters is that he
22 wasn't saying the data was unreliable; he was saying he
23 didn't want it to be used in a prosecution.

24 Q. In fact it says, the 17 May letter, that they don't
25 believe it should be used at all in relation to

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1 prosecutions, civil actions or shortfalls generally. It
 2 is a pretty strong letter, Mr Bartlett.
 3 **A.** It is a strong letter.
 4 **Q.** You would have thought it should go to a police
 5 investigation to look at these issues. Why didn't it go
 6 to those police investigations immediately?
 7 **A.** Because it wasn't saying that there was an issue with
 8 the data; it's saying their intent, their preference,
 9 their desire, their position, is that it's not used in
 10 those circumstances.
 11 **Q.** So it was considered for disclosure --
 12 **A.** Yes.
 13 **Q.** -- was it, Mr Bartlett? So you actually looked at it
 14 and said, "Should this go to police forces that are
 15 conducting investigations?", and your decision or
 16 someone else's was, "No, it shouldn't"?
 17 **A.** Well, we subsequently had legal advice, as well, which
 18 says it shouldn't.
 19 **Q.** It doesn't seem that the Post Office has changed very
 20 much, Mr Bartlett --
 21 **A.** Well, that's --
 22 **Q.** -- if we analyse everything that you say.
 23 **A.** Well, that's a little bit unfair, actually, because
 24 we've discussed those issues with those law enforcement
 25 teams as they've cropped up. We're not concealing

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1 **A.** There is a current investigation. There is no previous
 2 investigation.
 3 **Q.** Right. Did you see their evidence to the Inquiry?
 4 **A.** Some of it.
 5 **Q.** Okay. So I'm just going to ask you something about
 6 that. Saf Ismail says in his witness statement -- I'm
 7 not calling these up but, just for the record,
 8 WITN11170100 -- at paragraph 221:
 9 "Often postmasters will be suspended prior to
 10 interview without understanding the reasons for that
 11 suspension. Postmasters are still not shown evidence
 12 relating to investigation into their branches prior to
 13 investigation interviews being conducted by Post Office
 14 Investigators."
 15 You've been taken to Mr Jacobs' concerns -- Mr Blake
 16 took you to a series of documents this afternoon --
 17 about the lack of information provided to him when he
 18 was notified of an investigation and invited to
 19 an interview. At paragraph 24 of his witness statement,
 20 WITN11180100, he talks about his experience:
 21 "I considered the interview to be an interrogation
 22 and adversarial. It was not a collaborative discussion.
 23 The interview was similar in style to a formal police
 24 interview, as the questions put to me were interrogatory
 25 and the documents were put to me as exhibits."

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1 anything at all.
 2 **Q.** Mr Bartlett, overall, what we seem to have from your
 3 evidence is we seem to have a situation whereby you and
 4 your team are prepared to back the Horizon system with
 5 no evidence whatsoever that the thing should actually be
 6 presented before any court in relation to any shortfall.
 7 That's basically the situation, Mr Bartlett, isn't it?
 8 **A.** No.
 9 **MR STEIN:** Thank you.
 10 **MR BLAKE:** Sir, we have Ms Watt and Ms Allan.
 11 **SIR WYN WILLIAMS:** Yes.
 12 **Questioned by MS WATT**
 13 **MS WATT:** Good afternoon, Mr Bartlett. I ask questions on
 14 behalf of the NFSP.
 15 **A.** Hello.
 16 **Q.** You've been answering questions about the development of
 17 the post-Horizon scandal conduct of investigations
 18 throughout today and also what seems to be the vexed
 19 issue of when is it an interview, a meeting or
 20 a discussion.
 21 I just want to take a look at some of those issues
 22 regarding the cases of Elliot Jacobs and the other
 23 Postmaster Non-Executive Director who underwent
 24 an investigation, Saf Ismail. You just mentioned that
 25 one, I think.

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1 Okay, so that's my summary. Just a couple of
 2 questions now.
 3 At paragraph 69(b)(ii) of your second witness
 4 statement, you talk about the policy -- Mr Blake took
 5 you to it this morning, I'm not sure how to pronounce
 6 it, I'll say GICLEP.
 7 **A.** The new Combined --
 8 **Q.** The new Combined policy, yes, and that's POL00448353.
 9 You described the commitment to ethically executed,
 10 evidence-led, transparent investigations. Given the
 11 evidence of Mr Ismail and Mr Jacobs, in what way would
 12 you say the Post Office investigations met those
 13 standards?
 14 **A.** So we've never dealt with Mr Ismail in that --
 15 **Q.** Can you refer just to Mr Jacobs?
 16 **A.** So Mr Jacobs. Well, I'm very pleased that the interview
 17 with Elliot Jacobs was recorded because it can go on
 18 record to show what the nature of that interview was.
 19 It absolutely was not an interrogation. It was an early
 20 engagement with him to understand his position and for
 21 him to give explanations, and for us to be open-minded
 22 as to what that may be. There was a subsequent -- off
 23 the back of Project Pineapple, which people have heard
 24 about, the ER team conducted a review of the conduct of
 25 that, of Elliot Jacobs' investigation, and they found

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1 that his complaints were completely unfounded.

2 **Q.** I've just got one final question after this one. Would
3 you agree that how postmasters, whether NEDs or not,
4 feel about the way they're dealt with is important?

5 **A.** Absolutely.

6 **Q.** Would you not agree that the conduct of, for instance,
7 that investigation, certainly the reporting of it, would
8 simply reinforce to today's postmasters that not a great
9 deal has actually changed. Some of the wording in your
10 new Combined Policy has changed, some of the deck chairs
11 have been rearranged, but what's said about their recent
12 experience, if that's anything to go by, there's still
13 a long way to go to win back the trust of postmasters in
14 the conduct of investigations?

15 **A.** There is a long way to go but what I would say is, if
16 postmasters were to listen to the interview that we had
17 with Elliot, I'm absolutely confident that they would
18 think that things are different compared to how they
19 were done before, and also, it might be helpful to add
20 a couple of matters that were referred to us by the NFSP
21 were dealt with very sensitively and we received
22 feedback from the NFSP to that effect. So I think it is
23 different from the past.

24 **Q.** Because the NFSP liaise with you on the way in which you
25 are in fact conducting matters; is that not correct?

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1 conduct a full criminal investigation following a report
2 from the Post Office of suspected criminality.

3 Prior to May this year and during your tenure at the
4 Post Office, I assume that you're aware that the Post
5 Office was a Specialist Reporting Agency in Scotland,
6 meaning it was entitled to carry out its own full
7 criminal investigation into suspected criminal conduct
8 and to report the findings of that directly to the
9 Public Prosecutor in Scotland without the requirement to
10 have this first reported to the police?

11 **A.** Yes.

12 **Q.** I assume that you're also aware that, in May of this
13 year, the Lord Advocate, Scotland's most senior law
14 officer, confirmed that the Post Office was no longer
15 fit to continue in its own as a Specialist Reporting
16 Agency in Scotland, due to its failure to comply with
17 its duties of disclosure and candour?

18 **A.** Yes, we were consulted around that and I contributed to
19 a response back saying that we did not want to have that
20 status any more.

21 **Q.** If you can elaborate, what were the reasons that you
22 provided for not wanting to have that status?

23 **A.** Because we're not a prosecuting agency. Therefore, we
24 shouldn't have that right or ability to have that
25 status.

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1 **A.** Yes, and in those particular cases, they brought them to
2 us, and we discussed with them our approach and what the
3 outcome was, and they were happy with how that was
4 conducted.

5 **Q.** But we're not talking about Mr Jacobs' case when you're
6 talking about that?

7 **A.** Yes, certainly not Mr Jacobs. It's two other matters.

8 **MS WATT:** Yes, thank you.

9 **SIR WYN WILLIAMS:** Sorry, just so I'm clear, Mr Bartlett,
10 are you saying that following the interview with
11 Mr Jacobs, he made a complaint which was investigated
12 and found to be unjustified?

13 **A.** Yes, sir.

14 **SIR WYN WILLIAMS:** Right, fine. Next, please.

15 **Questioned by MS ALLAN**

16 **MS ALLAN:** Good afternoon, Mr Bartlett.
17 My name is Christie Allan, and I represent Core
18 Participant Susan Sinclair, who is a wrongfully
19 convicted subpostmaster and the first to successfully
20 appeal her conviction in Scotland.
21 In your second paragraph at paragraph 69, which
22 I don't propose to turn up, you describe the activity of
23 the A&CI staff as a POL criminal investigation, but
24 caveat this with the fact that it's not an end-to-end
25 investigation, and it is for law enforcement agencies to

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1 **Q.** You mentioned earlier that there seemed to be
2 an apparent reluctance by authorities in Scotland to
3 adopt evidence collected by non-law enforcement
4 agencies. Do you think that this, the stripping of Post
5 Office's role as a Specialist Reporting Agency, has had
6 a bearing on that?

7 **A.** I'm sure it has but it's not limited to the Post Office.
8 So, in my previous role at a financial regulator, the
9 Procurator Fiscal insisted that Police Scotland recreate
10 an investigation that had already been completed by the
11 Regulator, because they wanted Police Scotland to do it.

12 **Q.** Okay, thank you. Has any official review work been
13 undertaken by your team or within wider Post Office, as
14 a result of the decision by the Lord Advocate?

15 **A.** No, we supported it being removed.

16 **MS ALLAN:** Okay, thank you. I think that ends my questions
17 there. Thank you.

18 **THE WITNESS:** Thank you.

19 **SIR WYN WILLIAMS:** Thank you very much.
20 So is that it, Mr Blake?

21 **MR BLAKE:** That's it, sir, yes.

22 **SIR WYN WILLIAMS:** Right. Very good. Well, I think
23 everybody knows that tomorrow we are starting at
24 9.00 am. In part, at least, that is on my convenience,
25 because I have a personal appointment, which I have to

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1 keep, which means that we won't be able to sit beyond
 2 1.00, all right? So I want everybody to know that the
 3 sitting hours tomorrow are conditioned by that.
 4 It is also the case that Mr Foat will be giving
 5 evidence remotely. I acceded to a request to that
 6 effect on the grounds of his health and so I am giving
 7 everyone warning that his evidence, save in the most
 8 exceptional circumstances, has to end tomorrow, so that
 9 means by around 1.00, so that Mr Blake, and anyone who
 10 wishes to ask him questions, should tailor their
 11 questioning with all that in mind. All right?

12 With those remarks, I will bid you good evening and
 13 see you in the morning.

14 **MR BLAKE:** Thank you very much, sir.

15 **(4.31 pm)**

16 **(The hearing adjourned until 9.00 am the following day)**

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