

Tuesday 17 December 2024

1
2 (9.29 am)
3 **SIR WYN WILLIAMS:** Mr Beer, curious is a word which has been
4 much used in this Inquiry, and people may have noticed
5 how curious I was to see people sitting in different
6 places.

7 **MR BEER:** Yes.

8 **SIR WYN WILLIAMS:** Ms Greaney, I think we're ready for you
9 though the door hasn't shut at the back yet, so I'll let
10 you know when they've shut the door so that you have the
11 floor to yourself.

12 **Closing submissions by MS GREANEY**

13 **MS GREANEY:** Sir, the Inquiry has received detailed written
14 closing submissions from Post Office in Phases 2 to 7.
15 I do not intend to rehearse the content of those
16 submissions orally. I propose to address some headline
17 points which will not take up the full hour that has
18 been allocated.

19 Post Office recognises that its actions, as explored
20 by this Inquiry, have caused harm and suffering to
21 postmasters, their families and to many others.

22 I would like to start by reiterating Post Office's
23 apology for the damage that it has caused to every
24 person who has been affected by the Horizon IT scandal.
25 This Inquiry has been a humbling experience, not only

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1 Post Office acknowledges that it will, rightly, be
2 judged in the months and years to come by what it does,
3 not by what it says it is going to do.

4 Post Office has sought to assist the Inquiry in
5 fulfilling its terms of reference to understand and
6 acknowledge what went wrong in relation to Horizon in
7 order to identify what key lessons must be learnt for
8 the future. The scale and scope of the evidence heard
9 by the Inquiry over the last two plus years is vast.
10 That includes evidence from postmasters, as well as from
11 a very significant number of witnesses who were or are
12 employees of Post Office.

13 The Inquiry heard from those in senior positions in
14 Post Office, as well as those in less senior roles,
15 dealing with day-to-day issues with postmasters.

16 Post Office acknowledges that the Inquiry will
17 rightly be critical of a number of individuals, not only
18 from Post Office. It invites the Inquiry to bear in
19 mind the serious governance and structural failures that
20 permitted their actions to be unchecked, resulting in
21 failings to the detriment of postmasters.

22 Post Office raises this not to excuse but to explain
23 the context in which those failures occurred. The
24 combined testimony of the witnesses heard and the
25 hundreds of thousands of documents disclosed by Post

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1 for those that gave evidence but for those that
2 currently work at Post Office or used to, and who are
3 all equally appalled by Post Office's failures.

4 No one who has read and listened to the evidence
5 during this Inquiry could come to any conclusion other
6 than that the Horizon IT scandal is the most widespread
7 miscarriage of justice in British legal history, and
8 that its roots lay in fundamental structural and
9 governance failings.

10 As the Inquiry will have seen from the evidence read
11 and heard in Phase 7, Post Office today is a different
12 organisation from the one that was in place during the
13 failures of the past but it still has a long way to go
14 to reset its relationship with postmasters and the
15 public. Post Office is not perfect, and does not
16 pretend to be, but it is firmly committed to continuing
17 to learn lessons from this Inquiry. It will be
18 considering the proposals for improvements made by other
19 Core Participants in their closing statements as part of
20 its ongoing work.

21 The new leadership at Post Office brings a fresh
22 perspective and they are committed to making the changes
23 that are necessary to restore confidence in the business
24 and to ensure that nothing like this will or could ever
25 happen again.

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1 Office to the Inquiry has, Post Office hopes, given the
2 Inquiry detailed insight into the workings of every
3 relevant aspect of Post Office's business over the last
4 30 years.

5 In the early phases, the Inquiry heard from
6 witnesses who joined the Post Office in the '60s and
7 '70s, several coming to occupy the most senior positions
8 some 20 or 30 years later. A picture emerged of
9 a company in the late 20th century and the early part of
10 this century, which certainly at a senior level had
11 little experience and understanding of the IT revolution
12 which had already taken place in many other companies,
13 and which it was inevitable that Post Office had to
14 join.

15 It is a source of deep regret to Post Office that
16 the reliance on Fujitsu and the belief of the
17 reliability of Horizon, which emerged in those early
18 days, was allowed to take root within Post Office in the
19 decades that followed.

20 Post Office has referred in its written closings in
21 earlier phases to a mindset that took hold in Post
22 Office, to the effect that: Horizon had no bugs, errors
23 or defects; such problems as did arise in Horizon were
24 due to user error or dishonesty; a strong resistance to
25 countenancing the existence of any flaws in Horizon;

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1 a mindset that saw it as an advantage not to keep
2 postmasters informed about systems issues that were
3 identified; a mindset that positively discouraged more
4 widespread dissemination of information; a mindset that
5 focused on protecting the Post Office brand and the
6 commercial interests of the company.

7 This mindset was compounded by an organisational
8 hierarchy, which meant that junior employees did not
9 feel able to escalate issues upwards. This in turn
10 resulted in insufficient overview being taken at senior
11 level. Important senior roles were occupied by
12 individuals who regrettably lacked sufficient
13 understanding of the obligations and responsibilities
14 attaching to those roles. They either did not have
15 sufficient personal experience of Horizon technology, or
16 were not sufficiently senior within the overall
17 organisation to carry out those roles effectively.

18 Similar themes again emerged during the evidence
19 heard during Phases 5 and 6. Post Office has accepted
20 in its written submissions for those phases that there
21 was a series of governance failings in the organisation.
22 Key information about Horizon and prosecutions based on
23 Horizon was not shared effectively, either horizontally
24 or vertically, within the Post Office, and there was no
25 clear structure to ensure that relevant knowledge was

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1 a deliberate attempt to prevent the advice being
2 considered by the Board.

3 Consistent with the prevailing mindset that has been
4 revealed in the evidence in Phases 3 and 4, Post
5 Office's response to the Second Sight Interim Report
6 showed multiple failings on the part of the Executive.
7 They adopted a defensive attitude from the start to
8 Second Sight's negative findings and, consistent with
9 an assumption of postmaster fault, refused to entertain
10 the possibility that Horizon or Post Office's treatment
11 of postmasters, including inadequate training and
12 support, were to blame.

13 The evidence also shows that the Board failed
14 properly to scrutinise either the Second Sight Interim
15 Report or Susan Crichton's update paper for the July
16 2013 Board meeting. Given the concerns raised about the
17 existence of bugs, about Post Office's investigation
18 function and about the treatment of postmasters, the
19 Board's failure to challenge the Executive was
20 a significant one, particularly given the concerns
21 raised by the Board about claims for wrongful
22 prosecution leading to a notification to insurers.

23 As I said at the outset, I do not intend to rehearse
24 or seek to summarise the points that have been made in
25 the written closing statements of Post Office for all

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1 consistently and appropriately communicated throughout
2 the organisation.

3 As Post Office has acknowledged in its written
4 closing statement for Phases 5 and 6, the apparent lack
5 of knowledge or understanding on the part of senior
6 executives and Board members that Post Office conducted
7 its own prosecutions against postmasters was
8 particularly striking. When Post Office separated from
9 Royal Mail Group in 2012, there was a failure to ensure
10 that incoming Board members and senior executives were
11 briefed either on the fact that Post Office was
12 a prosecutor or on the central importance of Horizon
13 data to those prosecutions. There was a lack of clear
14 lines of accountability for reporting on prosecutions to
15 the Board, which created the structural conditions for
16 inadequate Board oversight of prosecutions.

17 This, in turn, severely reduced the Board's
18 effectiveness in holding the Executive to account.
19 Similarly, there was a failure to share the first Clarke
20 Advice or its substance with the Post Office Board.
21 This appears to have arisen from a collective failure on
22 the part of the then Post Office Legal team to
23 appreciate its full significance and inadequate
24 processes being in place for sharing the substance of
25 key legal advice with the Board, rather than

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1 phases. Post Office focuses the remainder of this oral
2 statement on aspects of the work that it has done since
3 the judgments of Mr Justice Fraser in the Common Issues
4 and Horizon Issues trials to bring about organisational
5 and cultural change to address the failures identified
6 and to ensure that the wrongs of the past will not be
7 repeated.

8 Since 2019 Post Office has taken steps to shift its
9 focus to postmasters. Post Office accepts that the pace
10 of change in the organisation has been too slow. Post
11 Office acknowledges that it has a lot of work to do in
12 order to address its shortcomings and rebuild the trust
13 of postmasters that has been so severely damaged by its
14 failures and that it is actions rather than words that
15 count.

16 Post Office has implemented a number of changes
17 since 2019 to start re-orientating the business towards
18 the interests of postmasters, which I will deal with
19 under the following headings: (1) listening to the views
20 of postmasters; (2) changes to its discrepancy processes
21 and the support it provides to postmasters; (3) Horizon
22 improvements; (4) cultural changes; (5) governance
23 changes; and (6) post Office's plans for the future.

24 First, Post Office acknowledges that it failed to
25 listen to and act on the concerns of postmasters about

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1 the Horizon system. Since the events which are the
 2 subject of this Inquiry, it has taken steps to bring the
 3 views of postmasters into the centre of the business.
 4 Since June 2021 Postmaster NEDs have sat on the Post
 5 Office Board, which has enabled the views of postmasters
 6 to be heard on matters of strategic and key operational
 7 importance.

8 Following the recent point of two new Postmaster
 9 NEDs, continuity will be ensured by one current
 10 Postmaster NED remaining in post until June 2025.

11 In addition to the Postmaster NEDs, in 2021, Post
 12 Office appointed a Postmaster Experience Director, who
 13 spends two days a week in Post Office Head Office
 14 liaising with the executive teams to inform them about
 15 the operational experiences and concerns of postmasters.

16 Furthermore, Post Office has plans to expand the
 17 mechanisms for enabling the views of postmasters to be
 18 heard and taken into account in the business. First,
 19 the Post Office panel will work with Post Office to
 20 ensure that the postmaster voice is heard at
 21 an operational level by considering and challenging key
 22 policies and processes, and communicating the work of
 23 the panel to postmasters in order to build confidence.

24 Secondly, the consultative council will enable Post
 25 Office to consult with postmasters on the future plans

1 information, including manuals and training materials,
 2 to help and support postmasters and their staff on
 3 a day-to-day basis and which postmasters can also use to
 4 report IT issues. Any defects or issues relating to
 5 Horizon are set out in Knowledge Articles, which are
 6 published on Branch Hub within 48 hours of being
 7 identified. These articles serve an important role in
 8 ensuring postmasters are kept up to date and have the
 9 information they need should a discrepancy arise.

10 Post Office intends that these processes will be
 11 kept under review by the postmaster panel with the aim
 12 of ongoing improvement.

13 The Inquiry will bear in mind that Post Office no
 14 longer exercises a prosecutorial function. It does not
 15 now and has no intention in the future of conducting its
 16 own criminal investigations or prosecutions. Post
 17 Office will support law enforcement agencies in their
 18 investigations, as it plainly should.

19 Third, the Inquiry has heard detailed evidence from
 20 Simon Oldnall, Branch Technology Director at Post
 21 Office, and Tracy Marshall, in written and oral
 22 evidence, that Post Office has worked hard through the
 23 Horizon Improvements Programme to remediate bugs, errors
 24 and defects, including those identified by Mr Justice
 25 Fraser. It has put in place a programme to identify and

1 for Post Office that arise from the implementation of
 2 the Strategic Review, so as to make sure that the views
 3 of postmasters are taken into account and considered in
 4 the changes that are proposed.

5 Second, Post Office has changed fundamentally the
 6 way it investigates discrepancies shown on the Horizon
 7 system and the support it provides to postmasters. The
 8 Inquiry has read and heard detailed evidence from Tracy
 9 Marshall, Retail Engagement Director, and Melanie Park,
 10 Central Operations Director. The burden of proof is now
 11 on Post Office to establish that a discrepancy is
 12 a genuine loss to Post Office and the fault of the
 13 postmaster or their assistant.

14 This is a crucial step in addressing the imbalance
 15 of power that previously existed in Post Office's
 16 policies, procedures and practices. In cases where the
 17 postmaster does not agree with the Post Office's
 18 position, there is a "Dispute" button on Horizon that
 19 a postmaster can press to raise a discrepancy or dispute
 20 a transaction correction that has been issued. There is
 21 a three-tier Dispute Resolution Procedure, and the
 22 option of a referral to a Dispute Resolution Review
 23 Committee.

24 Post Office provides improved support to postmasters
 25 through Branch Hub, a digital platform which provides

1 fix any new bugs, errors and defects in Horizon, and
 2 carried out significant work to establish an ongoing
 3 programme of improvements to a wide range of procedures
 4 across many parts of Post Office's operations, including
 5 training and business support.

6 The Inquiry has also received detailed written
 7 evidence from Mr Oldnall about the way in which Post
 8 Office now better monitors Fujitsu's compliance with
 9 Fujitsu's own contractual obligations to provide
 10 a secure and reliable Horizon system.

11 The Inquiry is aware that Post Office continues to
 12 be in ongoing discussions with Fujitsu about
 13 an extension to the Horizon contract.

14 Fourth, the Inquiry has heard that, from the end of
 15 2019, Post Office has introduced initiatives intended to
 16 bring about cultural changes across the organisation.
 17 Post Office has recognised the need for fundamental
 18 cultural change. As Nick Read said in his first
 19 statement to this Inquiry, Post Office recognises the
 20 presence of oppressive behaviour and intimidating
 21 actions in the past, which led to a lack of respect and
 22 trust between Post Office and its postmasters. It
 23 acknowledges that there has been a lack of effective
 24 leadership, a lack of effective training and support and
 25 a lack of responsibility within the organisation. It

1 accepts that it has work to do to restore trust with
 2 postmasters and with the public as a whole. Cultural
 3 changes in the Post Office are integral to the
 4 rebuilding of that trust.

5 To remind the Inquiry, those initiatives to reset
 6 the Post Office's culture include the following: the
 7 introduction of new training modules, including
 8 substantial induction training which educates new
 9 employees about the Horizon IT scandal and mandatory
 10 Horizon scandal training and GLO awareness.

11 In June and July 2024, the Post Office launched
 12 a Behaviours Framework that applies to all those working
 13 in Post Office, which is intended to act as a guide and
 14 to instil behaviours that are seen as key to preventing
 15 a repeat of the wrongs of the past.

16 New complaints channels have been implemented via
 17 the postmaster survey, college engagement survey, and
 18 strategic partner survey.

19 These changes are not just aspirational. The new
 20 Behaviours Framework is embedded into the recruitment
 21 process and used to measure the performance of everyone
 22 at Post Office. The Board takes ultimate responsibility
 23 for ensuring that cultural change takes place but every
 24 person working at Post Office has their part to play.

25 Cultural change, of course, takes time. However,
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1 improvements in succession planning and a cultural shift
 2 towards accountability and long-term planning.

3 To address the need for a unifying purpose in group
 4 strategy, which Grant Thornton considers lies at the
 5 heart of governance dysfunction in the Post Office, Post
 6 Office has commissioned a Strategic Review. Post Office
 7 has taken action to address governance issues identified
 8 by Grant Thornton, where it has been able to, pending
 9 the outcome of the Strategic Review. It has taken steps
 10 to improve the composition and competency of the Board,
 11 the Interim General Counsel is now a standing attendee
 12 at Board meetings.

13 Action has also been taken to improve the quality of
 14 information on which the Board reaches decisions, and
 15 measures have been introduced to avoid the Board being
 16 overburdened with issues that ought to be dealt with at
 17 Executive level.

18 The Group Executive, now called the Senior Executive
 19 Group, has been restructured so as to focus discussions
 20 better and improve the speed of decision making.
 21 A wholesale review of Executive Committees is under way.

22 Post Office notes the proposals put forward by
 23 others for alternative governance structures, including
 24 an oversight committee as proposed by the NFSP. It also
 25 notes the view of the governance experts that

1 recognising that changes has not happened quickly
 2 enough, Post Office has put in place plans, including
 3 a Strategic People Plan, which are intended to embed
 4 cultural change from the foundation of the organisation
 5 upwards, focusing on building better relationships with
 6 postmasters, with a real emphasis on restoring trust.

7 A key objective of Post Office's recent Strategic
 8 Review, which I shall come on to talk about shortly, is
 9 the commencement of a new relationship between Post
 10 Office and postmasters, in which there will be
 11 a significant increase in postmaster remuneration,
 12 improved support and the strengthening of the postmaster
 13 voice. Post Office sees this proposal as underpinning
 14 the drive towards a reset of the culture in its
 15 business.

16 Fifth, Post Office has acknowledged in the course of
 17 written closing statements made in respect of earlier
 18 phases, including 5 and 6, that there were serious
 19 governance failings in the organisation which played
 20 a substantial part in the injustices that occurred.
 21 Post Office commissioned Grant Thornton to review its
 22 corporate and operational governance in 2023. Post
 23 Office accepted Grant Thornton's conclusions that it
 24 requires a unifying strategy, greater role clarity,
 25 streamlined decision-making processes, significant

1 responsibility and accountability should rest with the
 2 Board. Post Office considers that, at least to some
 3 extent, the NFSP's proposals for an oversight committee
 4 will be addressed by the proposal for a Postmaster
 5 Consultative Council, which will work together with Post
 6 Office on the implementation of proposals arising from
 7 the Strategic Review.

8 Six, through the Strategic Review, the new team at
 9 Post Office has put forward a proposal to Government for
 10 the future of the Post Office, which will enable it
 11 better to serve the interests of postmasters and thereby
 12 the public that they serve. Post Office has been
 13 pressing for a review of Government's policy as sole
 14 shareholder in respect of Post Office for some years.

15 Post Office has been loss-making since its
 16 separation from RMG in 2012 and, in the face of
 17 significant commercial and structural challenges, those
 18 losses are expected to worsen in the future.

19 The Government has nonetheless long held the view
 20 that Post Office should be financially self-sustaining
 21 and not rely on government subsidy. Post Office is
 22 looking forward to receiving greater clarity from
 23 ministers as to how that could or should be achieved and
 24 the policy objectives that would underpin it.

25 Post Office considers that the changes that it seeks

1 to make as part of implementing its Strategic Review
 2 will be far reaching and to the benefit of postmasters
 3 first and foremost but also to the long-term future of
 4 Post Office as a whole, and the communities that are
 5 served by Post Office.
 6 The review carried out between June and September
 7 2024 drew on Post Office members of staff, Board
 8 members, postmasters and other stakeholders and experts.
 9 Nigel Railton, Interim Chair of Post Office, stated in
 10 his speech on 13 November 2024:
 11 "Fundamental to the implementation of the Strategic
 12 Review is Post Office's plan to deliver a new deal for
 13 postmasters. This will significantly increase the total
 14 annual income of postmasters through a vastly improved
 15 share of revenues and strengthen their role in the
 16 direction of the organisation. The implementation of
 17 the Strategic Review will be informed by strong
 18 postmaster engagement through the establishment of a new
 19 consultative council and a postmaster panel. The
 20 Strategic Review is also aimed at refocusing the Post
 21 Office's operations, so that there is a streamlined
 22 central organisation which serves the interests of
 23 postmasters so that they may serve their communities via
 24 sustainable businesses."
 25 Nigel Railton, the Interim Chair, explained in his
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1 technological changes, whilst waiting for funding
 2 decisions. Ultimately, it is in the Government's hands
 3 as to whether it agrees with the proposed strategy, and
 4 whether that strategy will be funded.
 5 Post Office considers that its plan to transform the
 6 Post Office offers the best opportunity for the
 7 organisation to flourish and benefit those whom it
 8 serves, namely postmasters and the public.
 9 Post Office recognises that, until all postmasters
 10 receive full and fair redress, there is no prospect of
 11 them achieving closure in respect of these terrible
 12 events. Post Office remains fully committed to playing
 13 its part in ensuring that postmasters receive full and
 14 fair redress as quickly as possible.
 15 It has been the long held view of Post Office that
 16 the compensation scheme should be run independently of
 17 Post Office because the perpetrator of injustice should
 18 not administer the assessment of redress.
 19 It is also Post Office's view that legal advice
 20 should be offered when the 75,000 fixed sum is offered
 21 to postmasters. Simon Recaldin has informed DBT of his
 22 view that there should be consideration of extending the
 23 schemes to family members, and Post Office welcomes
 24 DBT's consideration of this.
 25 Post Office notes that DBT is providing an update on
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1 evidence to the Inquiry that, as a result of the
 2 Strategic Review and subject to DBT approval, Post
 3 Office proposes to reset the NBIT programme, to improve
 4 confidence in its delivery and to ensure that it
 5 provides what postmasters need. Post Office intends to
 6 work closely with postmasters to define the new
 7 programme.
 8 Post Office acknowledges that work needs to be done
 9 to ensure that its proposal remains aligned with the
 10 work being carried out by DBT, with Grant Thornton,
 11 Boston Consulting Group and the Government Internal
 12 Audit Agency. Post Office welcomes continued
 13 involvement in DBT's reviews. The Inquiry has also
 14 heard that the Government is planning a Green Paper on
 15 the future of Post Office, which will be published in
 16 2025.
 17 Post Office is now at a critical juncture. The
 18 organisation has a new and experienced Interim Chair and
 19 Interim Acting CEO, a relatively new Board, and a SEG
 20 team who are skilled in delivering transformation change
 21 of this nature and are committed to implementing the
 22 plans so critical to the Post Office's future, as set
 23 out in the Strategic Review.
 24 Post Office is already doing what it can to push
 25 forward its plan for transformation with structural and
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1 financial redress in its written submissions. Post
 2 Office regularly updates the HSS and the OCS web pages
 3 with the current figures. Post Office would be happen
 4 to provide further written updates to the Inquiry as to
 5 the progress of the redress schemes, if that would
 6 assist the Inquiry.
 7 Furthermore, if the Inquiry would be assisted by
 8 receiving written updates or further information from
 9 Post Office on other matters, then Post Office will of
 10 course provide such information as may be requested.
 11 Post Office would like to extend its thanks to
 12 postmasters who have given evidence or engaged with this
 13 Inquiry as Core Participants or by responding to the
 14 YouGov survey.
 15 Post Office wishes to thank the Chair,
 16 Ms Eliasson-Norris, Mr Page and the Inquiry Counsel and
 17 solicitor teams for their thorough investigation and
 18 examination of the evidence. Post Office will reflect
 19 carefully on the findings in the forthcoming Inquiry
 20 report and will take the Inquiry's recommendations
 21 extremely seriously.
 22 Post Office must end this closing statement as it
 23 began: with an apology. Post Office repeats its
 24 sincerest apology to all who have been affected by its
 25 actions and reiterates its determination to continue
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1 with the process of learning the lessons from this
2 Inquiry.
3 Post Office remains firmly committed to ensuring
4 that nothing like this could ever happen again but
5 acknowledges that it will rightly be judged in the
6 months and years to come by what it does, not by what it
7 says it is going to do.

8 **SIR WYN WILLIAMS:** Thank you, Ms Greaney.

9 Ms Leek, it's a matter for you. If you're going to
10 take -- well, I'm addressing Ms Leek now.

11 If you're going to take a full hour, or thereabouts,
12 then I think we'll probably take a break now, rather
13 than ask you to break somewhere in the middle. I guess
14 you'd prefer that, yes?

15 **MS LEEK:** I would, sir.

16 **SIR WYN WILLIAMS:** Right so we'll take a break now.

17 **MS LEEK:** Thank you.

18 **SIR WYN WILLIAMS:** What's the time now?

19 So we'll break until 10.15 and then we'll hear from
20 Ms Leek.

21 (10.00 am)

(A short break)

23 (10.15 am)

24 **SIR WYN WILLIAMS:** All right, I think we're about to start
25 again. I'm glad there's some self-discipline going on

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1 witnesses will now seek to distance themselves from
2 Ms Vennells.

3 Just two examples, if I may. First, Jo Swinson said
4 in her oral evidence that Ms Vennells knew about the
5 Clarke Advice. When I asked her questions about this,
6 Ms Swinson conceded that this assertion was based on
7 a single email, which she had not seen at the time.
8 That email does not withstand the weight which
9 Ms Swinson now seeks to load upon it. She did not have
10 any personal knowledge on the issue but clearly, and in
11 retrospect, wanted to assume the worst of Ms Vennells
12 and sought to point the finger at her.

13 In his oral evidence, Alan Cook, the Managing
14 Director of Post Office between March 2006 and early
15 2010, stated that Ms Vennells probably authorised in
16 2006 substantial legal costs for Post Office's claim
17 against Mr Castleton. This could not be correct. In
18 fact, Ms Vennells did not join Post Office until January
19 2007.

20 Sir, I now turn to the chronology of Ms Vennells'
21 involvement, which cannot, for obvious reasons, be
22 a complete chronology. Even in 140 pages of written
23 submissions, we could not set out a complete chronology
24 with a reference to every relevant document.

25 Ms Vennells was CEO of a newly separated, highly

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1 by people in the audience telling other people to be
2 quiet because they won't listen to me!

3 Right, Ms Leek. Over to you, Ms Leek.

4 **Closing submissions by MS LEEK**

5 **MS LEEK:** Thank you, sir. Sir, in our written submissions
6 we have sought to analyse carefully and forensically the
7 chronology of what Ms Vennells did and did not know
8 about various key matters and what she did and did not
9 do with that knowledge. That document has now been
10 published by the Inquiry. We submit that it is only by
11 looking forensically at all of the documentation that
12 a fair picture of Ms Vennells' actions can be seen.

13 In the time we have allotted to us today, I shall
14 highlight a number of points from our written
15 submissions which go to information provided to
16 Ms Vennells which was incomplete or incorrect, or which
17 she was not given at all.

18 In our written paper, we have made submissions of
19 general application on several topics. I do not propose
20 to repeat them here save to make one point: when
21 witnesses have given recent evidence of matters relevant
22 to Ms Vennells, without there being supporting
23 contemporaneous documents, this evidence should be
24 approached cautiously. It is inevitable, having regard
25 to the very human desire for self-preservation, that

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1 complex business with more than 11,000 branches. Her
2 role as CEO and, before that, as Network Director,
3 stretched far more broadly than Horizon, to financial
4 management, stakeholder engagement, strategic planning
5 and decision making, regulatory matters and the
6 financial success of the company.

7 Sir, I do not raise that to downplay in any way the
8 importance of Horizon, simply to highlight the huge
9 demand of competing priorities on the CEO of a business
10 of this size and nature.

11 Sir, I now turn to bugs, errors, defects and remote
12 access before Ms Vennells became CEO.

13 Paragraph 88 of Mr Stein's submission suggest, and
14 I quote:

15 "It is simply not credible for Ms Vennells to have
16 uncritically adopted the mantra that she put forward in
17 a letter to Lord Arbuthnot on 9 January 2012. She said:
18 ""There has been no evidence to support any of the
19 allegations and we have no reason to doubt the integrity
20 of the system, which we remain confident is robust and
21 fit for purpose'."

22 He relies on this assertion to suggest that the
23 organisation was corrupt from the top. Sir, it is easy
24 to make assertions such as this with hindsight, knowing
25 what we know now about what has been found regarding

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1 bugs, errors and defects but, from a close analysis of
 2 the contemporaneous documentation, it can be seen
 3 exactly why it was reasonable for Ms Vennells to make
 4 this statement, and it was not out of a corrupt motive.
 5 So far as Ms Vennells was aware, she had a competent
 6 Head of IT and a competent General Counsel on whom she
 7 believed she was entitled to rely.

8 Taking over the helm of Post Office at the time of
 9 separation from RMG, as we have heard, was a gargantuan
 10 task. It was simply not possible to delve personally
 11 into each matter raised nor realistic that she would
 12 have the expertise in all disciplines to do so. Why
 13 should she not have been entitled to trust Ms Crichton,
 14 Mr Young and Ms Sewell to give her the unvarnished
 15 position?

16 Ms Vennells had no background in IT and was never
 17 employed by Post Office in an IT role. Post Office had
 18 an IT Department, which included IT technical
 19 specialists and Senior Managers, for example Mr Young
 20 and later Ms Sewell, whose role was to keep the Board
 21 and the Executive Team informed of important matters.

22 Ms Vennells relied, and submits that she was
 23 entitled to rely, on Post Office's IT function to
 24 provide accurate information to her, to the Board and to
 25 the Executive Team in relation to matters of Horizon

1 was reliable. He approved the approach and wording of
 2 a draft letter sent in Ms Vennells' name to Mike Weir MP
 3 in November 2011 which described Horizon as "rigorously
 4 tested", and said that there was no evidence at all that
 5 Horizon has in some way been at fault.

6 Mr Young's evidence is that he first became aware
 7 about the integrity of Horizon becoming an issue when he
 8 was contacted by Computer Weekly shortly before the
 9 publication of its article in May 2009. He told
 10 Computer Weekly this:

11 "Horizon is an extremely robust system which
 12 operates over our entire Post Office Network and
 13 successfully records millions of transactions every day.
 14 There is no evidence that points to any fault with the
 15 technology. We would always look into and investigate
 16 any issues raised by subpostmasters."

17 It was around the same time that Ms Vennells first
 18 became aware of concerns by way of the Network
 19 Functional Report for April 2009. That report recorded
 20 this unambiguous statement:

21 "Legal advice is that we have no reason to doubt the
 22 system's integrity and this has been tested in the
 23 courts."

24 Ms Vennells was given assurances from experts that
 25 there was nothing wrong with the system. The clear

1 integrity.

2 Sir, until March 2012 when he left Post Office, Mike
 3 Young was the most Senior Manager with responsibility
 4 for IT in the business. He reported directly to the
 5 Managing Director, first Alan Cook, then to Dave Smith
 6 and then to Ms Vennells. Mr Young confirmed in his
 7 evidence that it was his responsibility to ensure that
 8 IT related issues were resolved, and to ensure that the
 9 Board was notified of IT issues which required its input
 10 or oversight.

11 Mr Young said that he was only ever aware of two
 12 bugs, errors or defects, otherwise known as BEDs, in
 13 Legacy Horizon: blue screen and ISDN errors.

14 The only BEDs he was aware of in relation to HNG-X
 15 were BEDs which affected the Oracle database during the
 16 test and the pilot rollout. He said he had no knowledge
 17 of any BEDs that would have caused transaction or
 18 reconciliation errors in branch accounts and the only
 19 occasion mentioned in his witness statement or indeed
 20 seen in the documentation on which he escalated concerns
 21 about Horizon integrity to the Board or the Executive
 22 Team, was when he alerted Mr Cook and the Executive Team
 23 about the Computer Weekly article in May 2009.

24 Mr Young repeatedly made and supported comments to
 25 Ms Vennells and the Board which asserted that Horizon

1 message being given by both Legal and IT was that there
 2 was nothing to worry about.

3 Sir, the receipts and payments mismatch bug in HNG-X
 4 was discovered in September 2010. It was discovered to
 5 have affected up to 62 branches, with two branches being
 6 impacted twice.

7 Fujitsu prepared a paper dated 29 September 2010 for
 8 a meeting with POL to discuss the bug. They noted that
 9 the bug was impacting around 40 branches. Mr Young
 10 accepted that he was informed of the bug in February
 11 2011, several months after its discovery. Ms Sewell was
 12 aware of the bug by 4 March 2011. Ms Vennells was not
 13 made aware of the bug until May 2013. The Inquiry has
 14 heard no evidence to the contrary.

15 Mr Young and Ms Sewell both accepted that they did
 16 not escalate their knowledge of the bug to Ms Vennells
 17 when they first became aware of it. The evidence is
 18 clear that Mr Young did not escalate his knowledge of
 19 the bug before he left POL in 2012 and that Ms Sewell
 20 did not escalate her knowledge at any point prior to May
 21 2013.

22 Sir, coming to remote access between 2007 and 2011.
 23 The evidence before the Inquiry establishes that,
 24 between 2008 and 2010, a number of POL managers,
 25 including Andrew Winn, Rod Ismay and Angela van den

1 Bogerd, then a Senior Network Manager, were made aware
2 that Fujitsu had the power or a potential power to
3 change branch accounts remotely, without the authority
4 or knowledge of the affected subpostmasters. This
5 information was not passed on to the Board or to
6 Ms Vennells.

7 On the contrary, the message given internally to
8 POL's Executive Team was that it was not possible to
9 make changes to branch accounts without the knowledge or
10 consent of the relevant subpostmaster.

11 Ms van den Bogerd and Mr Ismay knew, at the latest
12 in early 2011, that Fujitsu could, in certain
13 circumstances, alter branch data remotely without
14 subpostmasters' knowledge. They were two of
15 a substantial number of POL managers who had been made
16 aware of this by 5 January 2011. There is no evidence
17 that any of these managers escalated their knowledge to
18 the Board or the Executive Team.

19 It is clear from the oral evidence of two of the
20 most Senior Managers involved, Mr Ismay and Ms van den
21 Bogerd, that they did nothing to escalate their
22 knowledge. Ms Vennells still does not understand why
23 they would not have done so. The knowledge with which
24 Mr Ismay is fixed runs directly contrary to what he had
25 written in the Ismay Report, as to there being no

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1 briefing. Sir, this very issue was considered at the
2 Post Office Board meeting on 29 May 2011 at which the
3 Board discussed the steps being taken to implement EY's
4 recommendations.

5 What Ms Vennells did not know, though, was the
6 significance of the finding which EY had made. She did
7 not know this because she was not told that the
8 existence of the APPSUP role created this risk to the
9 integrity of the accounting data held in the system.

10 Ms Vennells gave oral evidence that it is unlikely that
11 she would have understood at the time, without advice
12 from an IT expert, that EY's comments about the APPSUP
13 role showed that Fujitsu could make changes to branch
14 accounts without the authorisation of subpostmasters.

15 Sir, the Inquiry can be confident that Ms Vennells
16 is right that she was not told that the APPSUP role
17 could potentially be used to make unauthorised changes
18 to branch accounts: first, there is no evidence that she
19 was told; and, second, the reason why she was not told
20 is obvious from Mr Young's evidence. He knew that, as
21 with most IT systems, it was possible to gain access to
22 the system remotely, and that Fujitsu could make changes
23 to branch accounts with subpostmasters' consent.
24 However, he, Head of IT, had in his words:

25 "... no belief, understanding or even inkling that

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1 backdoors in Horizon. He did not return to his report
2 and seek to correct anything. When asked why this was
3 the case, he offered no explanation for his failure to
4 do so, other than he could not recall receiving the
5 message as to remote access being possible.

6 Turning to the 2010/2011 Ernst & Young audit. The
7 EY audit of the control environment at Fujitsu for the
8 financial year ended 27 March 2011 included the
9 reporting of weaknesses in the IT Governance and Control
10 Framework, particularly in relation to Fujitsu and
11 Horizon, and made recommendations for improvements.
12 EY's detailed observations included, on page 33 of the
13 manager letter, that:

14 "There are inappropriate system privileges assigned
15 to the APPSUP role."

16 The risk associated with that is weakness was,
17 I quote:

18 "Unrestricted access to privileged IT functions
19 increases the risk of inappropriate/unauthorised access
20 which may lead to the processing of unauthorised or
21 erroneous transactions."

22 Ms Vennells was briefed on this audit report by
23 means of a document which appears to have been prepared
24 by Fujitsu in April 2011, with input from Ms Sewell.
25 Ms Vennells has no reason to think she did not see this

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1 Fujitsu made changes to branch accounts without the
2 authorisation of subpostmasters."

3 Ms Vennells was not told that there was a risk that
4 Fujitsu could use its APPSUP privileges to tamper with
5 branch data because Mr Young did not himself appreciate
6 that this was a real risk.

7 In the meantime, in a report to the Royal Mail Group
8 ARC in September 2011 Chris Day, the CFO, together with
9 Lesley Sewell and Rod Ismay, stated, and I quote:

10 "As a result of the process and controls in place,
11 POL is fully confident in the Horizon computer system
12 operating in its branches. This accounting system and
13 the processes around it enable our branches to maintain
14 accurate and reliable accounts."

15 The text of this report, sir, was run past Mr Young
16 and Ms Crichton for comment. The report also stated,
17 with regard to prosecutions, that:

18 "POL remains satisfied that this money was missing
19 due to theft in the branch. Due to the controls set out
20 above, POL does not believe the account balances against
21 which the audits were conducted were corrupt."

22 This is the very same message that Ms Vennells was
23 receiving from Finance, from IT, and from Legal.

24 Sir, moving on chronologically to the instigation of
25 the Second Sight review. We see other clear examples of

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1 Ms Vennells receiving incomplete or incorrect
2 information from trusted colleagues in the information
3 and briefing documents she received from meetings with
4 MPs on 17 May and 18 June 2012. Ms Vennells'
5 straightforward submission in this regard is that she
6 was entitled to rely on an unequivocal statement to the
7 Board by the General Counsel for its factual accuracy.
8 Ms Crichton had said at the Board meeting in January
9 2012:

10 "The business has also won every criminal
11 prosecution in which it has used evidence based on the
12 Horizon system's integrity."

13 Ms Vennells had no reason to question this. This
14 information was then transposed directly into what
15 Ms Vennells said to James Arbuthnot on 18 June 2012:

16 "Every case taken to prosecution has found in favour
17 of the Post Office."

18 Ms Vennells now knows and accepts that that was
19 false. She still does not understand why Ms Crichton
20 failed to give her accurate information, but would not
21 have considered that she needed to verify what she was
22 being told by her General Counsel.

23 As for the conduct of the Second Sight review,
24 between mid-2012 and July 2013, Second Sight and POL
25 investigated the cases referred to Second Sight by MPs

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1 with the Horizon IT system. The information she
2 received during the review was that neither Second Sight
3 nor Post Office had identified any system-wide problems
4 with the IT system, being briefed in those terms in
5 an email from Ms Crichton on 19 March 2013, and for the
6 call with Lord Arbuthnot on 23 May 2013, the key message
7 in that briefing being:

8 "We are concerned that the investigation is
9 overrunning, that the findings will not be definitive
10 and there will be no satisfactory outcome to the Horizon
11 question."

12 The message at 2.6 was:

13 "The investigation has been running for a year and,
14 to date, no evidence of systemic failures has been
15 found."

16 At 5.3:

17 "Post Office is not saying Horizon is free from
18 defects. Systems of this nature occasionally encounter
19 problems. We are confident, though, that no
20 subpostmaster has been wrongly convicted or suspended
21 due to Horizon defects."

22 In addition, she was briefed for the Board call on
23 1 July 2013 as follows:

24 "Notes for Board update on Second Sight
25 Investigation."

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1 and the JFSA. Ms Vennells was not involved in the
2 investigation. It required subject matter expertise.
3 Post Office established a working group to consider the
4 evidence presented by Second Sight and to formulate
5 POL's response. Its membership drew together knowledge
6 and expertise in IT, accounting, security and network
7 operations.

8 In addition, a group of managers, including
9 Mr Baker, an IT specialist, and Ms van den Bogerd,
10 a Senior Network Manager, were tasked with liaising
11 directly with Second Sight. Ms Vennells did not attend
12 meetings of the working group. She had no role in
13 directing or deciding what information Post Office would
14 provide to Second Sight and she was not involved in or
15 consulted about Post Office's substantive responses to
16 the cases.

17 These were operational matters which required the
18 specialist know-how of the teams dealing with Second
19 Sight. The evidence shows that Ms Vennells received
20 oral and written updates, mainly from Ms Lyons and
21 Ms Crichton, to report on the progress of the review,
22 and to prepare her for meetings with stakeholders.
23 Sir, one matter on which Ms Vennells did need
24 visibility was whether Second Sight or the Post Office
25 teams engaged in the project had identified problems

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1 She was told:

2 "Second Sight due to present initial findings at
3 a meeting with James Arbuthnot, MPs and JFSA next
4 Monday. Report will focus on four best cases in detail,
5 following an initial review of nearly 50 cases overall.
6 Key point to emphasise is that we understand Second
7 Sight have not identified any systemic issues with
8 Horizon itself. However, the report still presents
9 significant reputational risks for Post Office. SS
10 nervous about perceptions of a whitewash, and so may
11 draw attention to two points ..."

12 The two points being:

13 "... (a) issues with Post Office's wider support,
14 and (b) the fact that we have disclosed two previous
15 anomalies with the Horizon system, which they may
16 suggest means we cannot be confident that there are not
17 more widespread problems with the system."

18 Sir, this is what Ms Vennells is told specifically
19 about this point. This is a red herring, she is told:

20 "In both cases the errors were picked up and have
21 either been or are in the process of being addressed
22 with the affected subpostmasters. A comprehensive audit
23 has been performed to check that there weren't further
24 cases we weren't aware of and new procedures are being
25 put in place to ensure such anomalies are spotted at

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1 an early stage in the future."

2 What was she to take from this? It was a red
3 herring. The bugs had been dealt with. There's been
4 an audit to check whether there were other cases POL
5 wasn't aware of. Sir, she is also then told:

6 "We also have other concerns around Second Sight's
7 handling of the investigation. They haven't yet
8 reviewed all the evidence we have given them and, hence,
9 may not be in a position to set out definitive
10 conclusions on all four cases."

11 She is also told:

12 "It appears that they are not focusing on empirical
13 evidence in the way we would expect forensic accountants
14 to."

15 Sir, on the back of that last briefing note,
16 Ms Vennells briefed the Board on 1 July 2013.
17 Ms Vennells shared with the Board no more and no less
18 than she herself knew about the likely contents of the
19 Second Sight Interim Report as of 1 July 2013. It was
20 correct, based on what Ms Vennells had been told, that
21 the investigation to date had found no systemic issues.

22 Ms Vennells, in briefing the Board, noted:

23 "Horizon, like any large computer system, would
24 occasionally have anomalies and two were known of over
25 recent years."

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1 full, professional opinion on that issue. A reasonable
2 reader of the Interim Report as a whole would not have
3 understood that the conclusion in 8.2(a) was based
4 solely on the four spot reviews, as opposed to the
5 totality of the investigatory work carried out by Second
6 Sight, which they described in section 2 of the Interim
7 Report.

8 Further, the written briefing prepared for
9 Ms Vennells stated that Post Office understood that
10 Second Sight had not identified any systemic issues in
11 the four spot reviews to be attached to the Second Sight
12 Interim Report, nor in the other six spot reviews sent
13 to Post Office, nor otherwise during its investigation.

14 In short, Ms Vennells was told, both by Second Sight
15 and POL's internal team of specialists, that no systemic
16 issues had been found during the investigation.
17 Ms Vennells submits that she was entitled to rely on
18 what she was told.

19 Sir, turning to Ms Vennells' understanding of the
20 bugs that she was made aware of in 2013. Ms Vennells
21 was not an IT specialist and, as I've said, she relied
22 on POL's IT specialists for information about the bugs
23 and their implications for the reliability of the
24 system.

25 Two IT specialists reported to Ms Vennells at the

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1 Ms Vennells described these anomalies, which she now
2 recognises should have been called "bugs", at the same
3 time as stating that there were no systemic issues.
4 That understanding of the belief of her colleagues and
5 the findings of Second Sight was based directly on
6 information she had been given by the Working Group.
7 Two days later, a briefing note on the Second Sight
8 Interim Report was sent to Ms Vennells by Chief of Staff
9 Martin Edwards, with input from Susan Crichton, Alwen
10 Lyons and others. Ms Perkins was copied in. This was
11 produced before Second Sight had begun to circulate
12 drafts of the Second Sight Interim Report and was
13 therefore based on the work that Post Office had carried
14 out during the review, and what they had been told by
15 Second Sight.

16 This repeated that Post Office believed that Second
17 Sight had not found evidence of systemic problems within
18 the Horizon IT system. The Interim Report at
19 paragraph 8.2(a) clearly stated:

20 "We have found no evidence of system-wide systemic
21 problems with the Horizon software."

22 Second Sight were not required to include this
23 conclusion in their Interim Report, they chose to
24 include it and a person reading the Interim Report was
25 entitled to assume that it represented Second Sight's

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1 relevant time: Ms Sewell and Mr Baker. Ms Vennells said
2 that she relied on and was reassured by what she was
3 told about the bugs. She submits that she relied on the
4 Post Office IT Team through Mr Baker and Ms Sewell, in
5 four main respects: first, to obtain and inform her of
6 facts in relation to the bugs; second, to provide their
7 opinion on the significance of the bugs to the
8 reliability of the Horizon IT system; third, to inform
9 her of any other bugs or defects which they were aware
10 had impacted permits; and, fourth, to inform her if, in
11 their opinion, Post Office should carry out
12 investigations into whether there were or could be other
13 problems.

14 As to these four issues, Ms Vennells was told that
15 the bugs had been detected by Post Office Limited
16 processes, that the underlying technical problems had
17 been diagnosed and fixed, that Post Office had been
18 transparent with the affected subpostmasters and that no
19 subpostmaster had been left out of pocket.

20 Ms Vennells was told that the bugs were normal
21 occurrences in a system the size of Horizon and did not
22 indicate other or wider problems. What was important
23 was how Post Office had dealt with the bugs.

24 The 3 July 2013 briefing note to Ms Vennells on the
25 interim report gave the impression that the two bugs in

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1 HNG-X and the Falkirk bug were the only bugs which
2 impacted subpostmaster accounts of which Post Office was
3 aware. It dealt with the two bugs in Horizon Online and
4 introduced the Falkirk bug by stating:

5 "We are also aware of a further anomaly in Horizon.
6 Post Office IT did not recommend a further investigation
7 of possible defects in the system."

8 Similarly unambiguous information was given to
9 Ms Vennells by Ms Sewell in July 2013 in respect of
10 Michael Rudkin's assertion that he had met an individual
11 in the basement at Fujitsu who demonstrated an ability
12 to pass transactions directly into the Horizon system
13 and, in doing so, alter in realtime or overnight, the
14 recording holdings of foreign currency in Post Office
15 branch offices.

16 Ms Sewell said this to Ms Vennells, in an email on
17 7 July:

18 "Rudkin. We and Fujitsu have provided evidence to
19 Second Sight that there was only testing systems in the
20 basement in 2008. The equipment (hardware) and the
21 testing system were located in the basement. This has
22 been a constant challenge with Second Sight, as they
23 contest that Rudkin has signed an affidavit and
24 therefore there is a conflict of evidence. There
25 appears to be a lack of willingness to accept the detail

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1 as prosecutors and explains how internal and external
2 lawyers would apply the same checks and balances as
3 would be applied by the CPS. On 3 July 2013,
4 Ms Crichton sent an email to Mr Edwards and
5 Mr Flemington, discussing what would go into a speaking
6 note for Ms Vennells and Ms Perkins to use at a meeting
7 with Lord Arbuthnot. Ms Crichton wrote in the email:

8 "Nothing has emerged from the interim findings given
9 to us by Second Sight which would point to specific
10 convictions being unsafe. Cases have been through the
11 judicial process and the court considers all relevant
12 evidence, not just that relating to the Horizon computer
13 system."

14 That was 3 July 2013. Sir, these words made their
15 way verbatim into the speaking note. Again, this is
16 characteristic of the clear messaging that Ms Vennells
17 had been receiving, and continued to receive, from her
18 General Counsel and upon which she was entitled to rely.

19 Turning to the Clarke Advice and the prosecution
20 case review. Simon Clarke sent his expert evidence
21 advice to Post Office on 17 July 2013, the day after the
22 16 July Board meeting. Its circulation appears to have
23 been limited to Ms Crichton, Mr Williams, Mr Flemington,
24 and Mr Parsons of Bond Dickinson. Ms Crichton confirmed
25 that the document was not sent to the Board.

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1 we have provided. We have also had the tester, who
2 Rudkin believes took him to the basement, complete
3 a witness statement. He has confirmed that there was
4 only a testing system in the basement. This has been
5 a constant challenge with Second Sight and I'm not sure
6 how this will get resolved."

7 The message that was communicated to Ms Vennells in
8 the contemporaneous documents was that Mr Rudkin's
9 allegations had been investigated and that Post Office
10 was satisfied that they had no substance.

11 Sir, turning to advice on prosecutions. Ms Vennells
12 stated in a letter to the BEIS Select Committee on
13 24 June 2020 that she had discussed prosecutions with
14 Ms Crichton shortly after she became CEO. She was told
15 that POL approached POL's prosecutions with the same
16 rigour as the CPS, applying the Police and Criminal
17 Evidence Act 1984 and the Code for Crown Prosecutors.
18 The documentary evidence that Ms Vennells has seen since
19 she wrote to the Committee in June 2020 supports her
20 recollection that she was given assurances that Post
21 Office conducted prosecutions responsibly through
22 a structured and professional legal process.

23 This is consistent with the speaking note prepared
24 for Ms Vennells to use in May 2012 when speaking to Lord
25 Arbuthnot. That note describes the role of Post Office

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1 Ms Crichton did not set out in writing anywhere
2 a complete or accurate summary of the substance of
3 Mr Clarke's advice. It was her job to do so. Nor did
4 her successor, Mr Aujard. Indeed, while Mr Aujard
5 received a copy of the advice in a briefing pack from
6 Cartwright King, he claimed not to recall whether he had
7 read it in detail.

8 He suggested that his view at the time was that it
9 was a historic detail that was being dealt with through
10 the case review process. This might go some way to
11 explaining the messaging received by Ms Vennells.

12 Parts of Mr Clarke's advice were communicated to
13 Ms Vennells between July and October 2013, though in
14 a way that was piecemeal, unstructured and incomplete.
15 First, Cartwright King's advice that Post Office was
16 obliged to review past prosecutions was summarised in
17 Ms Crichton's update paper for the Board meeting of
18 16 July 2013. Second, this paper did not mention
19 Mr Jenkins nor the fact that Cartwright King had advised
20 Post Office that it was obliged to disclose the two bugs
21 in HNG-X and the Helen Rose Report.

22 Third, it also did not mention that Mr Jenkins and
23 Post Office had breached their duties as an expert
24 witness and prosecutor respectively. The reason for
25 this admission is that, as he said in his evidence,

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1 Mr Clarke did not reach a conclusion that Mr Jenkins and
2 Post Office had breached their duties until shortly
3 before he completed the Clarke expert evidence advice.

4 As I mentioned, that was not sent to Post Office
5 until 17 July, after the July Board meeting.

6 Fourth, Ms Vennells says that she was never told
7 about Mr Jenkins' and Post Office's breaches of duty.
8 She was also never told about the disclosure issues
9 relating to the Helen Rose Report.

10 Fifth, Post Office obtained three pieces of written
11 advice from Brian Altman, King's Counsel, between August
12 and October 2013, an interim review of Cartwright King's
13 process for reviewing criminal cases for disclosure on
14 2 August 2013, a general review of the prosecution case
15 review on 15 October 2013, and a forward-looking review
16 of Post Office's role as prosecutor.

17 Each of these documents discussed the issue with
18 Mr Jenkins; none of them was provided to the Board.
19 They were each summarised for the Board by the General
20 Counsel in a way that gave the impression that Mr Altman
21 had not identified any significant issues with
22 Cartwright King's conduct of the disclosure review, or
23 Post Office's conduct of past prosecutions.

24 For example, Ms Crichton emailed Ms Vennells after
25 a conference with Mr Altman on 9 August 2013, stating:

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1 to the disclosure issues was to conduct a review of past
2 cases to ensure that Post Office complied with its
3 disclosure duties. She was told that this review was in
4 the hands of experienced external criminal lawyers, and
5 that their approach was being checked by Brian Altman,
6 King's Counsel, a senior and experienced criminal
7 barrister.

8 She was also advised that Mr Altman agreed with the
9 approach of the external lawyers and had not found any
10 fault in their work.

11 Sir, Ms Vennells made no attempt to influence or
12 direct that process, save that she asked why the review
13 should not extend further back in time to look at more
14 cases. It was entirely for the lawyers to determine the
15 steps that Post Office needed to take to comply with its
16 legal duties, including what materials should be
17 disclosed, and to whom.

18 Ms Vennells was given the impression by successive
19 GCs that the case review exercise was being carried out
20 competently and professionally and, fundamentally, that
21 the exercise was what Post Office should be doing as
22 a matter of law to address the disclosure issues. As
23 a non-lawyer, Ms Vennells could not be expected to have
24 understood the significance of an unsafe witness, and
25 was entitled to rely on her General Counsel, Cartwright

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1 "Overall, his opinion in conference was that the
2 work that had already been completed was fine and along
3 the right lines, taking into account Post Office's
4 prosecutorial duties to disclose evidence/information to
5 the defence."

6 Sixth, Ms Vennells has a recollection of receiving
7 two pieces of information by word of mouth after July
8 2013. First, she says that she was told by Lesley
9 Sewell that Post Office had stood down a Fujitsu expert
10 witness because he had not revealed bugs during the
11 prosecution of Mrs Misra. Second, she was told by
12 Ms Crichton that POL was required to review the cases in
13 which the expert had given evidence.

14 Seventh, when Ms Vennells was informed, most likely
15 in October 2013, that Post Office had used an unsafe
16 witness from Fujitsu, she informed Ms Perkins, copying
17 in the CFO, Mr Day, and directed Ms Perkins to contact
18 Mr Edwards if she needed more information about this
19 issue. We submit that the inference to be drawn is that
20 the information in the email was given to Ms Vennells by
21 a Post Office lawyer.

22 Sir, Ms Vennells was neither wilfully blind, as
23 suggested by Core Participants, nor did she purposefully
24 close her eyes. She trusted her General Counsel. She
25 was advised by Ms Crichton that the right legal response

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1 King and Brian Altman, King's Counsel, to ensure that
2 Post Office was responding in an appropriate manner.

3 Ms Vennells was not responsible for Post Office's
4 failure to give disclosure of the fact that Mr Jenkins
5 had withheld information about his knowledge of bugs in
6 Horizon in his expert evidence.

7 Mr Altman, King's Counsel, stated in his evidence
8 that it did not occur to him at the time that this fact
9 should have been considered for disclosure, and
10 disclosed in appropriate cases, although he accepted
11 with hindsight that it should have done.

12 The evidence before the Inquiry has shown that this
13 was not the only misjudgement or mistake made by the
14 lawyers.

15 First, Mr Altman, King's Counsel, did not consider
16 the procedure by which Mr Jenkins had been instructed as
17 an expert witness because no one at Post Office told him
18 that Mr Jenkins had not been properly instructed. He
19 stated, however, that, looking back, this was something
20 that he should have queried. Mr Altman agreed that, if
21 he had been informed that Mr Jenkins may not have been
22 properly instructed or properly informed about his
23 duties as an expert witness, this may have led to
24 inquiries into broader failings by Cartwright King as
25 prosecuting lawyers, and whether Cartwright King had

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1 a conflict of interest in advising Post Office on past
 2 prosecutions in which they had acted as prosecuting
 3 lawyers.
 4 Second, Mr Clarke accepted in his oral evidence that
 5 there was a view that Cartwright King's review of past
 6 prosecutions, and I quote, "probably wasn't
 7 as independent as it ought to have been", and that
 8 Cartwright King's review may have become less rigorous
 9 and less observant of potential trends or themes in the
 10 cases as the review progressed.
 11 When he was asked whether Cartwright King may have
 12 become case hardened during the review he said:
 13 "That's exactly what I'm referring to. That's the
 14 point I'm making, that because you become slightly
 15 cynical, jaded, as inevitably is going to be the case,
 16 then you do miss things. Yes, I accept that."
 17 Third, Mr Clarke accepted that he was wrong not to
 18 have recommended disclosure following his review of
 19 Mrs Misra's case. Ms Vennells was not to know any of
 20 this. As Mr Moloney, King's Counsel, said yesterday:
 21 "Regulated legal professionals might be expected to
 22 provide requisite independence."
 23 Ms Perkins made the point in her evidence that the
 24 summaries of the external legal advice presented to the
 25 Board were inadequate. They failed to alert the Board

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1 setting out the options for Post Office's future
 2 prosecutions policy, he was doing so with the ARC
 3 proceeding on materially incomplete information, and he
 4 knew or ought to have known that this was the case,
 5 since it was he and his predecessor who had failed to
 6 provide the ARC with that information.
 7 There was no suggestion, for example, in Mr Aujard's
 8 paper that Post Office should discontinue prosecutions
 9 because of there being any reason to suspect that its
 10 past conduct of prosecutions had been inadequate or
 11 inappropriate.
 12 The starting point of Mr Aujard's analysis was that
 13 Mr Altman had not identified anything during his review
 14 of POL's prosecutorial role to suggest that POL's
 15 approach to prosecutions had been anything other than
 16 well organised, structured and efficient. That was not
 17 an accurate summary of what Mr Altman had said, nor did
 18 it sit happily with Mr Clarke's expert evidence advice,
 19 or the Helen Rose Report. The Post Office Board was
 20 entitled to assume that he was competent and that he
 21 would provide accurate summaries of the advice being
 22 provided to Post Office.
 23 Sir, throughout her role as CEO, Ms Vennells and the
 24 Board made use of highly reputable external advisors,
 25 including Deloitte, Linklaters, Bond Dickinson,

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1 to, amongst other matters: (i) the conclusions of the
 2 clerk expert evidence advice; (ii) the existence and
 3 significance of the Helen Rose Report; (iii) Mr Altman's
 4 view in his October 2013 General Advice that Mr Jenkins
 5 was tainted and that his future role as a witness was
 6 untenable; (iv) the statement in Mr Altman's general
 7 advice that he was left unclear about whether POL had
 8 challenged Mr Jenkins about his non-disclosures; (v)
 9 Mr Altman's criticisms of the disorder of POL's
 10 prosecution policies and past prosecutions; and (vi) the
 11 possibility that Cartwright King were conflicted due to
 12 their role in past prosecutions, including those in
 13 which Mr Jenkins had given evidence.
 14 Ms Vennells and the Board, at this time, assumed,
 15 and were entitled to assume, that the General Counsel
 16 were complying with their core responsibilities to alert
 17 the Board to legal risks and to provide accurate and
 18 complete summaries of external legal advice. That was
 19 their role.
 20 Ms Perkins shared that belief. That is the only way
 21 to understand her evidence that the omissions from the
 22 summaries were shocking and extraordinary.
 23 When, therefore, Mr Aujard presented his papers to
 24 the Audit and Risk Committee at the meeting in November
 25 2013, and subsequently in writing in February 2014,

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1 Cartwright King and leading counsel. As a non-lawyer,
 2 Ms Vennells did not seek to reach her own conclusions on
 3 legal advice but preferred, as she ought to do, to take
 4 advice from experts. That can be seen, for example, in
 5 Ms Vennells speaking directly with David Cavender,
 6 King's Counsel, about the tone of Post Office's case
 7 ahead of the Common Issues trial and subsequently
 8 ensuring that the Board was briefed on the proceedings
 9 by the external Legal Team the week before proceedings
 10 commenced.
 11 Matters such as the tone of POL's voice were matters
 12 on which Ms Vennells, as a non-lawyer, could properly
 13 involve herself in the detail of decisions being taken.
 14 In contrast, a CEO could and should not be expected to
 15 add value in relation to questions of law on which,
 16 quite properly, the General Counsel took the lead with
 17 Ms Vennells and the Board receiving appropriate
 18 briefings.
 19 As for the Mediation Scheme, this process for
 20 seeking resolution of cases was recommended by
 21 Ms Crichton, following discussions with Bond Dickinson.
 22 On 19 July 2013 Bond Dickinson prepared a mediation
 23 proposal paper which contained, under the heading
 24 "Workflow", what is clearly an outline of what became
 25 the Mediation Scheme.

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1 The statement that there were no grounds for
2 a blanket compensation scheme appears to have come from
3 advice set out in the Bond Dickinson mediation proposal
4 paper that:

5 "At present, there is insufficient evidence to
6 justify a blanket compensation scheme for
7 subpostmasters. Each case needs to be considered on its
8 individual merits."

9 As the mediation continued, Ms Vennells received
10 assurance that the investigation of the cases had not
11 revealed any faults with Horizon through a paper
12 prepared by Chris Aujard on 17 September 2014 to update
13 the Board on the progress of the Mediation Scheme, and
14 in briefing notes prepared by Mr Bourke in October 2014
15 and November 2014.

16 Ms Vennells was also led to understand that the
17 cases in the Mediation Scheme had been reviewed by
18 external criminal lawyers who had concluded that there
19 was no evidence of unsafe convictions within the
20 Mediation Scheme caseload. Again, Ms Vennells submits
21 that she was entitled to rely on statements made by the
22 General Counsel and Mr Bourke, a qualified solicitor,
23 for their accuracy. She was also entitled to believe
24 and did believe that these statements were an honest and
25 professional review, based on the evidence reviewed by

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1 access to legal files."

2 Sir, Ms Vennells played no material role in
3 decisions regarding disclosure or statements of factual
4 witnesses and experts in the GLO proceedings. She does
5 not recall being asked to be involved in any decisions
6 about disclosure and no questions were put to her in
7 oral evidence on this topic.

8 Ms MacLeod, as General Counsel, took the view, set
9 out in her witness statement for this Inquiry, that, in
10 respect of whether or not to call somebody like
11 Mr Jenkins as a witness:

12 "... my expectation was that this would have been
13 decided by the Legal Team."

14 The Inquiry may in fact have been surprised if it
15 had heard evidence that Ms Vennells had personally made
16 decisions regarding disclosure and witness evidence.
17 That is far from the role of the CEO.

18 Sir, the protection of POL's reputation.
19 Ms Vennells submits that the protection of a company's
20 reputation is a legitimate objective of a CEO. It is
21 clear from the documents that Ms Vennells saw no
22 conflict between the protection of Post Office's
23 reputation and positive engagement with the Second Sight
24 Interim Report. As she informed the Board in an email
25 on 4 July 2013:

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1 the Post Office.

2 Ms Vennells was aware that Bond Dickinson had been
3 engaged by Post Office as its primary legal advisor in
4 relation to the review and that Post Office's
5 investigation work included reviewing transaction data
6 sourced from Fujitsu. At the time, Ms Vennells had no
7 basis to second-guess what she was told about Post
8 Office's view of the outcome of the investigation.

9 Even contemporaneously, there is evidence in the
10 documents that the Post Office senior team and its
11 lawyers recognised that on occasion, Ms Vennells had not
12 been given correct or incomplete information. When
13 Ms Vennells gave evidence to the BEIS Select Committee
14 on 3 February 2015, she was not aware that Second Sight
15 had requested access to Post Office prosecution files.
16 Two days later, she wrote to Mr Richardson of Bond
17 Dickinson on 5 February 2015 stating:

18 "It was tough but I felt that, other than the issue
19 of withholding prosecution files, which caught us
20 completely by surprise, we did as you said."

21 Further, an email from Ms Crowe to Mr Cameron
22 Mr Davies, Ms MacLeod and Mr Aujard on 27 February,
23 which was copied to Ms Vennells, states that:

24 "A clear, major breakdown in communications between
25 Legal and the CEO surfaced at the Select Committee on

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1 "To summarise very briefly, we have taken the view
2 that the best way to minimise the reputational risks
3 associated with the review and to do the right thing for
4 the business and the people is to welcome the broad
5 thrust of the report and commit to acting on its key
6 findings in relation to the need for improvements in our
7 support and training processes."

8 This is entirely consistent, she said, with the
9 broader imperative for cultural change across the
10 organisation which the Board has discussed in recent
11 months.

12 Ms Vennells saw the implementation of the Interim
13 Report's recommendations on support and training as the
14 primary means of preserving Post Office's reputation.
15 In circumstances where Ms Vennells was being told that
16 the IT Horizon system was reliable but that there were
17 areas for improvement in training, support and culture,
18 it is understandable why she took the approach that she
19 did: to emphasise Post Office's confidence in the IT
20 system, while accepting that it should proactively
21 identify and improve culture, training, and support.

22 She was aware that Post Office served vulnerable
23 individuals in thousands of Post Office's nationwide and
24 it was of great importance to her that those people did
25 not lose their confidence in the Post Office and

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1 continued to feel able to collect benefits and pensions
2 and carry out other important transactions.

3 Sir, in conclusion, Ms Vennells understands the
4 strength of feeling about her, that of subpostmasters,
5 those directly affected by the wrongful convictions, and
6 that of the public. She heard what Mr Moloney said
7 yesterday about apologies being difficult to hear, and
8 she understands that position. She knows that any
9 apology will offer little comfort to those affected.
10 She cannot and does not try to hide from the fact that,
11 whilst CEO, she did not manage to uncover the truth
12 about the extent of the bugs, errors and defects in
13 Horizon, as found by Mr Justice Fraser. This is
14 a matter of deep and constant regret to Ms Vennells, as
15 is the fact that the convictions of the subpostmasters
16 were not overturned sooner.

17 Sir, Ms Vennells simply did not receive the
18 information which she ought to have been given by her
19 senior team, whom she trusted and to whom she delegated
20 responsible roles.

21 As she said herself, in her evidence to you:

22 "I am very sorry that I was not able to find out
23 what the Inquiry has found out. I don't know today how
24 much wasn't told to me. I do know information that
25 I didn't get, and I don't know in some cases why it

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1 hear from Mr Whittam.

2 (11.11 am)

3 (A short break)

4 (11.25 am)

5 **SIR WYN WILLIAMS:** Mr Whittam.

6 **Closing submissions by MR WHITTAM**

7 **MR WHITTAM:** Sir, Fujitsu thanks you for the opportunity to
8 make this short oral closing statement to supplement
9 Fujitsu's written closing submissions to the Inquiry.

10 As you know, Fujitsu has made careful evidence-based
11 written closing statements for Phases 2, 3, 4, and
12 collectively 5, 6 and 7. I do not repeat the content of
13 those closing submissions.

14 Fujitsu has reflected carefully upon the evidence
15 given to the Inquiry. In Phase 1, the Inquiry heard
16 clear, detailed and profoundly affecting evidence of the
17 human impact of hostile investigations and wrongful and
18 civil and criminal proceedings commenced by Post Office
19 against subpostmasters and their employees. Phases 2 to
20 7 of the Inquiry have exposed in detail the failings
21 which brought about those appalling miscarriages of
22 justice. The Human Impact phase of the Inquiry
23 reinforced the devastating impact of those events
24 described by the subpostmasters and the impact it had on
25 their lives.

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1 didn't reach me."

2 Ms Vennells still does not know why key information
3 was not passed on to her and explained. She believed
4 her senior team and General Counsel to be working hard,
5 and doing their best to investigate the subpostmasters'
6 complaints in good faith. She had faith in them and, as
7 far as she was concerned, had good working relationships
8 with them. She is devastated by the fact that
9 information was not shared with her. She has no desire
10 to point the finger at others nor to speculate as to why
11 information was not shared. She trusts that you, sir,
12 together with your panel, will establish the true extent
13 of the information that was not shared and perhaps why
14 it was not shared.

15 Throughout Ms Vennells' written and oral evidence,
16 and borne out throughout the documents and evidence of
17 others which have been adduced during the Inquiry, we
18 submit that there has been nothing to show that
19 Ms Vennells acted in bad faith. Ms Vennells wanted to
20 do right by the subpostmasters.

21 Sir, notwithstanding that the evidence phase of this
22 Inquiry has now concluded, Ms Vennells will continue to
23 assist your investigation in any way she can.

24 **SIR WYN WILLIAMS:** Thank you, Ms Leek.

25 So we'll break off now until 11.25, when we will

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1 As it has done previously, Fujitsu apologises for
2 its role in the suffering of affected subpostmasters,
3 employees and their families.

4 Fujitsu's written closing submissions for each of
5 the phases of this Inquiry have accepted, clearly and
6 candidly, where it's own systems, processes and people
7 have gone wrong. Nothing I say in this oral submission
8 is intended to detract from those acceptances.

9 The evidence received by the Inquiry has
10 demonstrated that the issues which have arisen are not
11 exclusively or even primarily IT issues. The
12 miscarriages of justice with which this Inquiry is
13 concerned were not caused by technical failures alone
14 but are the product of serious human and organisational
15 failures in conduct, ethics, governance and culture.

16 Fujitsu's commitments to helping the Inquiry
17 understand what happened is reflected in the extent of
18 its cooperation with the Inquiry. Fujitsu responded to
19 the Inquiry's Rule 9 requests as fully and
20 comprehensively as possible. At the start of the
21 Inquiry, warehouses were searched, databases were
22 processed and electronic documents from approximately
23 120 Fujitsu individuals were collected. More than
24 30 million records, electronic and hard copy, going back
25 more than 25 years have been collected. Throughout,

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1 Fujitsu has remained fully committed to supporting the
2 important work of this Inquiry, having produced over
3 240,000 evidential documents, assisted more than 30
4 witnesses in the provision of written and oral evidence,
5 and produced five detailed corporate statements.

6 From the outset of this Inquiry, Fujitsu has been
7 clear about the technical matters that have now been the
8 subject of substantial and careful examination.

9 The first of these relates to the existence,
10 identification, communication and resolution of bugs,
11 errors and defects in the Horizon IT system. The second
12 relates to the existence and use of remote access by
13 certain Fujitsu staff. I address these matters briefly
14 in turn.

15 In its opening statement to the Inquiry, Fujitsu
16 acknowledged that there have been a number of bugs,
17 errors and defects within the Horizon system and that,
18 in some instances, those bugs, errors and defects had
19 the potential to, and indeed did, affect the integrity
20 of subpostmasters' branch accounts. Fujitsu has
21 repeated this acknowledgement variously throughout the
22 Inquiry process.

23 Fujitsu has also explained that no complex IT system
24 will ever be completely free of bugs, errors and
25 defects. That common-sense proposition has been

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1 uniformly so.

2 The evidence heard over the course of the Inquiry
3 nonetheless compels the conclusion that, in general,
4 Fujitsu routinely and continually shared information
5 concerning the existence of the impact of bugs, errors
6 and defects with Post Office. It therefore follows that
7 contemporaneous knowledge of bugs, errors and defects
8 within Post Office went well beyond acknowledgement of
9 the mere theoretical possibility of bugs, errors and
10 defects.

11 Post Office has been aware for at least 25 years of
12 a potential for, and existence of, bugs, errors and
13 defects in the Horizon IT system, as well as the
14 potential for those which are unknown and unresolved to
15 exist. Post Office was also aware in 1999 of the
16 potential for bugs, errors and defects to impact upon
17 the integrity of branch accounts.

18 By way of illustration, in the annex to Fujitsu's
19 final written closing submissions in this Inquiry,
20 Fujitsu has identified at least 70 individuals within
21 Post Office and Royal Mail in relation to whom the
22 Inquiry has received unequivocal evidence of their
23 knowledge of bugs, errors and defects. This includes
24 members of the Post Office Board, senior executives,
25 in-house lawyers, as well as individuals working in Post

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1 accepted, repeated in evidence, by numerous Post Office
2 witnesses working across the Inquiry's relevant period.

3 Horizon is a multi-functional system encompassing
4 points of sale services and over 100 additional
5 services, including, amongst other things, financial
6 services, Government services and Lottery purchases. It
7 is a large, bespoke and highly complex system developed
8 by Fujitsu in conjunction with Post Office for use in
9 Post Office branches.

10 It interfaces with numerous different Post Office
11 and third-party systems. Initially, Horizon was rolled
12 out between 1999 and 2001, and remains in use in Post
13 Office branches across the United Kingdom today.
14 Horizon was and remains but one part of the Post
15 Office's IT infrastructure, supported not only by
16 Fujitsu but various other third-party suppliers.

17 Both the inherent complexity of the system and the
18 obvious potential for bugs, errors and defects
19 necessitated that processes governing the
20 identification, communication, escalation and resolution
21 of bugs, errors and defects were put in place at the
22 start and remain in place between Post Office and
23 Fujitsu. Fujitsu has frankly accepted that, whilst
24 these formal and informal information-sharing systems
25 were generally effective in practice, they were not

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1 Office's Security and Investigations Teams. That
2 knowledge spans the entirety of the period being
3 examined by the Inquiry.

4 The sheer number of Post Office and Royal Mail
5 personnel who were aware of the existence of bugs,
6 errors and defects is potentially relevant to the
7 Inquiry's work in another way. A number of witnesses
8 before the Inquiry could either not recall with accuracy
9 whether, or in what circumstances, they were made aware
10 of the existence of bugs, errors or defects, or
11 positively denied such knowledge in circumstances which
12 might be thought to be surprising.

13 In assessing that evidence, the Inquiry will be
14 entitled to conclude that: while of course knowledge
15 held by one person cannot unfairly be attributed to
16 another and while Post Office's corporate knowledge
17 cannot be abrogated for all-purposes, the Inquiry is
18 entitled to infer from the breadth and depth of
19 awareness of bugs, errors and defects within Post
20 Office, that it is likely that key institutional
21 decision makers did, in fact, have such knowledge.

22 The question of why this expansive institutional
23 knowledge was not appropriately considered by Post
24 Office or its legal representatives in the context of
25 proceedings against subpostmasters is a significant one,

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1 and a matter that will no doubt be the subject of
2 careful deliberation by this Inquiry.

3 Further, in its opening statement to the Inquiry,
4 Fujitsu accepted that Fujitsu staff had, and continues
5 to have, the ability to remotely access Horizon. That
6 access was and is possible in multiple ways, via various
7 ingress access types, from the time of the initial
8 rollout until now, including in both Legacy Horizon and
9 HNG-X.

10 Fujitsu has reiterated this position throughout the
11 Inquiry. Remote access was and remains a necessary part
12 of the suite of support tools available to manage the
13 live operation of the Horizon IT system, including the
14 attempts to rectify bugs, errors and defects. Indeed,
15 support staff from Fujitsu state in evidence that they
16 could have not done their jobs or operated Horizon
17 without it.

18 In its opening statement to this Inquiry, Fujitsu
19 submitted -- I'm sure you'll recall, sir -- that Post
20 Office had been aware from an early stage of Fujitsu's
21 ability to remotely access the Horizon system. That
22 submission has been borne out by the evidence given to
23 the Inquiry and was belatedly accepted by Post Office in
24 its final closing submissions.

25 Whilst abuse of remote access privileges by a malign
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1 for its share of organisational failings in its
2 submissions to the Court of Appeal, in March 2001, in
3 the case of Hamilton v The Post Office. The Court of
4 Appeal rejected that attempt, holding that:

5 "POL knew there were serious issues about the
6 reliability of Horizon. If POL needed further
7 information, it could have obtained it from Fujitsu."

8 That was a finding that was omitted by the Post
9 Office when quoting that same section of the judgment in
10 paragraph 10 of its written closing submissions.

11 The evidential basis for that conclusion is even
12 stronger on the evidence before this Inquiry and we
13 would invite you to adopt the same course as the Court
14 of Appeal.

15 To the extent that it is ever appropriate to
16 describe one party to an extensive and sophisticated
17 commercial contractual arrangement, like the Horizon
18 contact, as "subordinate" it is clear beyond argument
19 that the Post Office is not such a party. The Post
20 Office has been, and remain, very much in the driving
21 seat of that contractual relationship. As we saw in
22 Phases 2 and 3, it was Post Office who specified the
23 technical requirements by which the Horizon IT system
24 was developed and by which it has been changed over
25 time.

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1 actor cannot positively be excluded on the evidence,
2 there is no evidence for it and no reason to suppose it
3 occurred. Most importantly, there is no evidence to
4 support the suggestion that remote access privileges
5 were used for any purpose other than to provide
6 necessary technical support to Post Office branches. In
7 other words, there is no evidence to support any
8 suggestion of the malign use of remote access
9 capabilities.

10 It's regrettable that, in its written closing
11 submissions, Post Office sought to obfuscate its proper
12 share of responsibility for the events which are the
13 subject of this Inquiry, by seeking wrongly to deflect
14 blame to Fujitsu and other third parties. Post Office
15 has sought to characterise itself as the subordinate
16 partner in the relationship with Fujitsu and as
17 operationally and technically dependent on Fujitsu.

18 Perhaps tellingly, sir, you might have observed that
19 these submissions -- its paragraph 101 in the Post
20 Office written closing submissions -- are unsupported by
21 any reference to the evidence before this Inquiry.
22 That's unsurprising because the submissions bear no
23 resemblance to that evidence.

24 Sir, you'll be aware that Post Office previously has
25 sought to shirk liability by deflecting responsibility
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1 As we saw in Phase 4, it was Post Office who
2 determined the nature and extent of the Prosecution
3 Support which Fujitsu was required to provide,
4 including, by way of example, stipulating the form by
5 which the ARQ requests were made. Even in Phase 7 we
6 see the arrangements for the end of service life of
7 Horizon IT system continue to be sensitive to Post
8 Office's commercial needs, despite Fujitsu's serious
9 reservations.

10 More generally, the evidence for Post Office
11 dependency on Fujitsu is conspicuously thin. Post
12 Office has at all material times had its own IT
13 function. It's employed a number of IT specialists,
14 including highly experienced individuals such as Lesley
15 Sewell, who held positions of management and oversight
16 concerning all of Post Office's IT functions, including
17 the Horizon IT system.

18 As would be expected, the business as usual
19 operation of the Horizon IT system entails the sharing
20 of vast quantities of information about the system,
21 including, again entirely unsurprisingly, about
22 technical issues and bugs, errors and defects. In the
23 annex to our closing submissions, Fujitsu has summarised
24 some of those key means of information sharing. Post
25 Office has also had, at significant times throughout the
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1 life of Horizon, its own testing teams tasked with
 2 ensuring the quality of certain releases of Horizon.
 3 Post Office relies upon what it described as
 4 repeated assurances from Fujitsu that Horizon was
 5 reliable. It does not cite even a single example of
 6 such an assurance being given. To the extent that
 7 certain Post Office witnesses similarly suggested that
 8 they'd been provided with assurances as to the integrity
 9 of the Horizon IT system by Fujitsu, there was
 10 a complete lack of evidence to support those claims.

11 Indeed, as Fujitsu pointed out in its Phase 3
 12 closing submissions, those claims were either entirely
 13 vague and, confusingly, often made by individuals with
 14 no direct engagement with Fujitsu at all.

15 The better view of the evidence, sir, as Fujitsu
 16 submitted at the end of Phase 3, is that a message from
 17 the top within Post Office, consistently emphasised
 18 without evidence, the robustness of the system. Having
 19 said that, sir, to be absolutely clear, despite the
 20 observations that I've just made and also will continue
 21 to make about Post Office, I repeat: Fujitsu stands by
 22 all the matters it has accepted in its written closing
 23 statements.

24 Post Office investigations and prosecutions did not
 25 begin with the introduction of the Horizon IT system.

1 Office contained novel propositions, contractually
 2 obliging Fujitsu to provide support to Post Office in
 3 respect of prosecutions. That work was atypical for
 4 an IT service provider such as Fujitsu and was outside
 5 the normal work of Fujitsu technical staff.

6 It is a matter of profound regret to Fujitsu that it
 7 ever provided services to support Post Office
 8 proceedings against subpostmasters.

9 Fujitsu was never sighted on the full scale of Post
 10 Office's prosecutorial conduct and misconduct and, sir,
 11 that's plain from the fact that it did not provide
 12 evidence in all the cases. Nonetheless, Fujitsu accepts
 13 that it was inappropriately deferential to Post Office
 14 as its client and its senior management were
 15 sufficiently interventionist in their management and
 16 oversight of the Post Office Account. This led to
 17 a failure to properly challenge or scrutiny the
 18 appropriateness of requests made by Post Office and
 19 resulted in Fujitsu providing a service and Prosecution
 20 Support which fell short of its own corporate values.

21 In light of this, Fujitsu recognises that it failed
 22 properly to support those of its employees who engaged
 23 directly with Post Office and its lawyers in respect of
 24 Prosecution Support. This is particularly so for those
 25 who engaged in the provision of documentary and witness

1 Post Office had an established active investigation and
 2 prosecution function in place prior to the national
 3 rollout of the Horizon IT system in 2000. The available
 4 evidence demonstrates a significant increase in
 5 investigative and prosecutorial activity during the
 6 period of 1992 to 1998. This initial increase in
 7 investigative and prosecutorial activity occurred
 8 following the introduction of an in-house accounting
 9 system called Capture into Post Office branches in 1992,
 10 and pre-dates the rollout of the Horizon IT system.

11 The conduct of criminal prosecutions on behalf of
 12 Post Office fell considerably short of the important
 13 duties which apply to a private prosecutor. Hundreds of
 14 subpostmasters were wrongfully prosecuted. Indeed, the
 15 evidence now available to the Inquiry suggests that the
 16 failings in the conduct of Post Office prosecutors were
 17 considerably more fundamental than even those
 18 acknowledged in the Court of Appeal in the Hamilton v
 19 Post Office case.

20 In Phase 4 of the written closing submissions,
 21 Fujitsu made detailed submissions as to the wide range
 22 of serious deficiencies which undermined the integrity
 23 of Post Office prosecutions. I do not repeat those
 24 submissions today. Fujitsu nevertheless acknowledges
 25 that the Codified Agreement between Fujitsu and Post

1 evidence in relation to Post Office prosecutions and
 2 civil actions, with technical employees often left to
 3 engage directly with Post Office internal and external
 4 lawyers, rather than having appropriate mechanisms by
 5 which to monitor and support those employees.

6 In his written closing submissions, Gareth Jenkins
 7 notes particular failings of Fujitsu in its management
 8 and oversight of the Prosecution Support which he came
 9 to be required to provide. Sir, I can make it clear
 10 that Fujitsu accepts those failings.

11 In the course of Phase 7 the Inquiry explored issues
 12 regarding ongoing and future criminal investigations and
 13 prosecutions involving Post Office. Post Office's
 14 renewed interest in criminal investigation and
 15 prosecutions appears to be driven by perceived need
 16 within the Post Office for a deterrent and to recover
 17 apparent shortfalls. Despite the startling evidence
 18 heard during Phase 4 of the Inquiry, in relation to
 19 conduct of Post Office Investigators and lawyers in the
 20 context of proceedings against subpostmasters, as
 21 recently as July 2022, Post Office boasted in internal
 22 documents that its investigations unit, the first
 23 recognised investigations unit in the world, it claims,
 24 has an unblemished reputation.

25 A significant focus of that evidence and,

1 regrettably, a source of some confusion in the Phase 7
 2 evidence, was the nature of assistance, if any, which
 3 Fujitsu had provided or was willing to provide in
 4 support of such investigations. Moreover, Post Office's
 5 engagement with ongoing law enforcement investigations
 6 raises real questions as to the extent to which lessons
 7 have been learned regarding the matters which have been
 8 the subject of this Inquiry.

9 Fujitsu has set out the position in detail in its
 10 final written closings to ensure that that concern is
 11 fully aired. But, in summary, it is as follows: between
 12 February and July 2024, Fujitsu was contacted by four
 13 police forces in relation to four cases. This apparent
 14 flurry of criminal investigations, each of which
 15 appeared to have been referred to the relevant police
 16 forces by Post Office, caused Paul Patterson and his
 17 colleagues at Fujitsu such concern that Mr Patterson
 18 felt it necessary to escalate the matter to Nick Read as
 19 the CEO of Post Office. Mr Patterson was particularly
 20 aggrieved by some of the language used by Post Office
 21 staff in context of these criminal investigations and
 22 the apparent inference by those members of staff in what
 23 appeared to be matters relevant to the police forces.

24 Fujitsu does not know why it has not been contacted
 25 by the other police forces in connection with other

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1 to those criminal investigations. Fujitsu is, however,
 2 determined not to repeat mistakes of the past which have
 3 been so starkly revealed by this Inquiry.

4 In this context, Fujitsu is acutely aware that it is
 5 not in a position to offer independent expert opinion
 6 from any employee regarding the operation of the Horizon
 7 IT system. Fujitsu is also aware of the need to make
 8 full and appropriate disclosure regarding its knowledge
 9 of bugs, errors and defects in the Horizon IT system,
 10 including the potential for unknown, undiscovered and
 11 unresolved bugs, errors and defects affecting the live
 12 system, particularly as it ages without further
 13 investment, and the existence of remote access.

14 In addition, Fujitsu is also mindful that
 15 a consistent theme of the evidence before the Inquiry
 16 was the error in producing evidence for criminal
 17 proceedings from the Horizon IT system data, of focusing
 18 overly narrowly on whether there is a specific evidence
 19 of a bug or error or defect affecting a particular
 20 branch at a particular time, as compared to the
 21 potential for bugs, errors and defects, including the
 22 unknown ones, within the network more broadly, and is
 23 eager that police forces do not repeat the same error,
 24 in other words by asking Fujitsu to provide evidence
 25 limited to a particular branch.

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1 investigations. It's been suggested by some Core
 2 Participants that this correspondence and Fujitsu's
 3 correspondence with some police forces may reflect
 4 tactical positioning for the purposes of the Inquiry.

5 Sir, I can be completely clear on that front:
 6 inevitably, Fujitsu's attitude to the use of data
 7 derived from the Horizon IT system in criminal
 8 investigations and prosecutions has been informed by the
 9 shocking evidence heard by this Inquiry. Fujitsu is
 10 astute to ensure that it does not repeat the mistakes of
 11 the past and to ensure that it does not lend its
 12 assistance to Post Office in repeating those mistakes.

13 Moreover, far from that tactical positioning,
 14 Fujitsu's position regarding ongoing and future criminal
 15 prosecutions has remained consistent since its declared
 16 position on the 16 June 2020, in its letter to the BEIS
 17 Select Committee, that it will provide information to
 18 the police and other appropriate judicial authorities
 19 but not to Post Office-led prosecutions. To reiterate,
 20 Fujitsu has offered and will continue to offer full
 21 cooperation to any police force conducting
 22 an investigation into potential criminal wrongdoing in
 23 connection with Post Office branches. Fujitsu will
 24 cooperate with police forces in the preparation of
 25 factual witness statements to address matters relevant

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1 Relatedly, Fujitsu has become concerned by some of
 2 the correspondence it's reviewed between the Post Office
 3 and the relevant police forces, in particular the letter
 4 sent by Post Office to the Lancashire Constabulary on
 5 25 April this year and then provided by the Lancashire
 6 Constabulary to Fujitsu some three months later on
 7 24 July 2024. It's significant in a number of material
 8 respects.

9 Fujitsu sets auditor the severe deficiencies of the
 10 content of that letter in its written closing
 11 submissions, where, from the context of the apparent
 12 resurrection of the Post Office's criminal enforcement
 13 activity and the quick dismissal of Fujitsu's concern by
 14 both Mr Read and Owen Woodley, the content of that
 15 letter seemed to Fujitsu to be so egregious that
 16 Mr Patterson decided to write to Post Office two days
 17 later to cease any further correspondence on the matter.

18 There is no merit whatsoever in the suggestion,
 19 principally made by John Bartlett, that Fujitsu has been
 20 obstructive or uncooperative to police investigations.
 21 Fujitsu is surprised by that suggestion, which is
 22 plainly at odds with the evidence. Further, given the
 23 significant miscarriages of justice with which this
 24 Inquiry is concerned, a cautious approach in these cases
 25 is both reasonable and appropriate.

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1 In its opening statement to the Inquiry on 4 October
2 2022, Post Office submitted that it embarked on
3 an ambitious and accelerated large-scale effort to
4 retire Horizon by 2025 and replace it with a new system.

5 Over the course of Phase 7, the Inquiry has received
6 evidence concerning NBIT and the progress that has been
7 made towards replacing the Horizon IT system.
8 Increasingly, it's become clear that the NBIT programme
9 has experienced prolonged delays and technical
10 challenges. It has also become clear that Post Office
11 is no closer to replacing the Horizon IT system than it
12 was at the beginning of this Inquiry when it made its
13 opening statement.

14 In the interim, and something of concern,
15 insufficient investment has been made in the Horizon IT
16 system. The Horizon IT system is on an end of service
17 life IT infrastructure and, due to this status and its
18 age, there's an increasing risk of the existing Horizon
19 IT system infrastructure failing. That could inversely
20 impact the delivery of services to the public.

21 Since 2020, Fujitsu has consistently indicated its
22 concerns to Post Office in relation to supporting end of
23 service life infrastructure and that it wishes to exit
24 the Horizon contract.

25 Sir, as I've said, the core of this Inquiry are the

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1 and organisational failures in conduct, ethics,
2 governance and culture.

3 Fujitsu hopes that, having supported the Inquiry
4 through its work, it has gone some way to demonstrating
5 its commitment to learning lessons from the Inquiry
6 process and, most importantly, to ensuring that the
7 mistakes of the past are never repeated.

8 Thank you, sir.

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

10 So it's just about 12.00. Ms Dobbin, would you like
11 to make your submissions in one go, answer, I suspect,
12 yes, so would you like to have an early lunch or make
13 them now?

14 **MS DOBBIN:** Sir, I would like to make them in one go, if
15 that's okay.

16 **SIR WYN WILLIAMS:** Would you prefer to make them now or
17 shall we take an early lunch?

18 **MS DOBBIN:** Perhaps if we took an early lunch, if that was
19 all right?

20 **SIR WYN WILLIAMS:** Yes.

21 **MS DOBBIN:** Thank you.

22 **SIR WYN WILLIAMS:** So we'll begin again at -- well, 1.00.

23 (11.58 am)

24 (The Short Adjournment)

25 (1.00 pm)

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1 subpostmasters and their families, who were so
2 profoundly and tragically affected by the appalling
3 miscarriages of justice. Fujitsu reiterates its sincere
4 apology to the subpostmasters, employees and their
5 families.

6 The Inquiry has conducted a thorough and searching
7 investigation. The work of the Inquiry has revealed the
8 technical, human and organisational failings which
9 contribute to the suffering of said subpostmasters and
10 their families. Fujitsu accepts its share of those
11 failings and has set out in writing the detailed matters
12 which it does accept.

13 That said, the relative brevity of this oral closing
14 and the shorter-than-some written closing, should not be
15 taken as an acquiescence to all the criticisms levelled
16 at Fujitsu, particularly some of those I've touched on,
17 by the Post Office.

18 As already I have submitted, prior to the
19 commencement of this Inquiry, the appalling miscarriages
20 of justice that have now been laid bare by the evidence
21 received by this Inquiry, were framed as resulting
22 primarily or inclusively as IT issues. As evidence has
23 demonstrated, these miscarriages of justice were not
24 caused by technological failures exclusively or even
25 primarily but are, instead, the product of serious human

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1 **SIR WYN WILLIAMS:** Okay. I think we're all set, Ms Dobbin.

2 **Closing submissions by MS DOBBIN**

3 **MS DOBBIN:** Thank you.

4 Sir, Gareth Jenkins was interviewed by the police in
5 2021, just after this Inquiry had started in its current
6 incarnation, before the vast disclosure that it has
7 afforded. He told the police in that interview that he
8 had not been instructed as an expert by Post Office in
9 the cases in which he had been a witness.

10 That might have been surprising for the police
11 investigators to hear. That might have been confusing
12 for them, given the Clarke Advice was premised upon
13 Mr Jenkins' failures of disclosure as an expert witness,
14 given the Horizon Issues Judgment and given the Court of
15 Appeal judgments and their focus on the Clarke Advice.
16 Confusing, given that Post Office's position before the
17 Court of Appeal was that the fact that Mr Jenkins had
18 given evidence in a case meant that Post Office did not
19 disclose the full and accurate position regarding the
20 reliability of Horizon -- see paragraph 207 of the
21 Hamilton judgment -- in other words, that the focus was
22 squarely on Mr Jenkins and his failures of disclosure,
23 as an expert witness.

24 It was no less shocking to Mr Jenkins, who retired
25 in 2015, to have found himself the focus of so many

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1 criticisms and indeed singled out in the Horizon Issues
 2 Judgment, and then to find himself blamed by Post Office
 3 before the Court of Appeal for a number of miscarriages
 4 of justice. These were criticisms made of him that he
 5 had no opportunity to address. He had no chance to
 6 explain to Mr Justice Fraser, as then, that he was not
 7 correct in the way that he attributed to Mr Jenkins
 8 blame for inaccuracies in the evidence of some
 9 witnesses. He wasn't able to explain that there had
 10 been a large number of people who had commented upon the
 11 witness statements.

12 Mr Jenkins wasn't able to explain the role that he
 13 had within that team. He wasn't able to explain that
 14 when it came to correcting the position about the use of
 15 remote access, that it was he, Mr Jenkins, who did so,
 16 despite the fact that there were members of the SSC who
 17 were involved in the civil litigation. Mr Jenkins
 18 wasn't able to explain where he had obtained the
 19 information about the Callendar Square bug from. He
 20 wasn't able to explain that its existence had been
 21 disclosed in Mrs Misra's trial, contrary to the letter
 22 that Mr Justice Fraser sent to the DPP. He wasn't able
 23 to explain the background to his communications with
 24 Ms Rose.

25 There were many things that he was not able to
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1 litigation. No one saw fit to tell Mr Jenkins why he
 2 wasn't being called as a witness. No one told him, "The
 3 reason you're not being called as a witness, Mr Jenkins,
 4 is that Post Office has blamed you in a series of cases
 5 for failing to disclose bugs".

6 You will draw your own conclusions, sir, as to what
 7 that says about the lawyers involved.

8 Mr Jenkins didn't have the opportunity to speak to
 9 Mr Clarke about his Advice. Mr Jenkins didn't have the
 10 chance to tell Mr Clarke that his statement was
 11 a response to four questions that Mr Singh had asked him
 12 to answer. He did not have the opportunity to tell
 13 Mr Clarke that he had not been instructed as an expert
 14 when he gave this statement. He wasn't able to explain
 15 that in cases in which that statement had been used, he
 16 had explained to lawyers what the ARQ data might show
 17 and that lawyers from Cartwright King had said no to
 18 obtaining that data.

19 Sir, what this Inquiry has established are four
 20 essential truths, of which neither Lord Justice Fraser
 21 nor the Court of Appeal were aware: first, that Post
 22 Office was well aware of the bugs and issues that it was
 23 accusing Mr Jenkins or Fujitsu of not having disclosed;
 24 second, that Mr Jenkins was not instructed as an expert
 25 in a single case in which he gave evidence; third, that

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1 explain to Mr Justice Fraser and which would have put
 2 a very different complexion on matters. These are the
 3 things that show him not to have been the ventriloquist
 4 that my learned friend, Mr Henry, King's Counsel,
 5 accuses him of being and which are set out in detail in
 6 his fourth witness statement.

7 Mr Jenkins had no opportunity to tell the Court of
 8 Appeal that he had not been instructed as an expert in
 9 Post Office cases and had provided information to Post
 10 Office that he was now being criticised for not having
 11 disclosed. He had no opportunity to tell the Court of
 12 Appeal that, in fact, Post Office knew a lot about the
 13 bugs which it was accusing him of having not disclosed.

14 There was no one in the Court of Appeal able to
 15 point out the hypocrisy and the inaccuracy of Post
 16 Office's position, that the issue was not that of the
 17 single expert who had failed in his duties of
 18 disclosure, but that Post Office, as an organisation,
 19 and individual investigators and lawyers, had no concept
 20 of basic laws and ethics of prosecuting, that this
 21 incompetence extended to their use of Mr Jenkins.

22 Mr Jenkins, in fact, had no idea until 2021 of the
 23 existence of the Clarke Advice. He had been misled in
 24 2013 as to why Post Office no longer needed assistance.
 25 He had been asked by Post Office to assist in the civil

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1 this failure to instruct Mr Jenkins as an expert was
 2 apparent to Cartwright King and Post Office from the
 3 point of the Clarke Advice in 2013; fourth, that Post
 4 Office, as an organisation, and individual investigators
 5 and prosecutors, did not know or did not apply basic
 6 laws and rules and guidance which applied to
 7 prosecuting.

8 Returning to the critical point about what
 9 Mr Jenkins told the police in 2021, that he hadn't been
 10 instructed as an expert in any case. In summary, that
 11 Post Office had put Mr Jenkins forward as an expert in
 12 criminal cases, had sought out his opinions and then to
 13 rely on them but had never actually instructed him as
 14 an expert witness, appeared extraordinary and giving
 15 rise to the question: how could that possibly have
 16 happened?

17 Sir, this Inquiry having disclosed in excess of
 18 270,000 documents, confirms not just the truth of what
 19 Mr Jenkins told the police but the answer to the
 20 question how it happened that he wasn't instructed as
 21 an expert. There are two fundamental reasons. First,
 22 quite simply, because investigators and lawyers did not
 23 know or ignored the law that they ought to have been
 24 applying. The evidence before this Inquiry demonstrates
 25 a profoundly more disturbing picture of prosecutorial

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1 incompetence than could have been imagined at its
2 outset, disturbing for its lack of regard for a very
3 basic law and ethics which govern prosecuting,
4 disturbing because it was being done by a private
5 prosecutor, cloistered from the usual forms of scrutiny
6 that applied to a public prosecutor and given all of the
7 vested interests at stake.

8 The second reason why it happened was that
9 prosecuting lawyers didn't address the capacity in which
10 they were relying upon Mr Jenkins to give evidence.
11 They didn't distinguish between Mr Jenkins as a Horizon
12 technical expert and Mr Jenkins as an expert witness as
13 a matter of law.

14 The fact alone that every single one of Mr Jenkins'
15 statements was an ordinary Section 9 witness statement
16 that contained none of the content necessary to render
17 it admissible as expert evidence demonstrates this and,
18 ultimately, Mr Warwick Tatford's evidence confirmed it
19 and demonstrated in human terms how it happened.
20 Throughout the prosecution of Mrs Misra there was, in
21 his words, a "muddle" as to the capacity in which
22 Mr Jenkins was being relied on.

23 Sir, given that Mr Jenkins gave oral evidence in
24 Mrs Misra's cases, without being taken through any of
25 the steps to establish that he was giving evidence as

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1 allegations and insinuation that he lied or was party to
2 presenting the veneer of Horizon as though it was
3 infallible.

4 There are two fundamental obstacles to this
5 characterisation of Mr Jenkins. First, that he provided
6 the sort of information that he is accused of
7 withholding, notwithstanding the way he was communicated
8 with and used by prosecutors. Indeed, Mr Jenkins openly
9 adverted to information which it has been submitted in
10 this Inquiry there was a campaign to keep secret.

11 For example, Mr Jenkins told Professor McLachlan and
12 the prosecution in Mrs Misra's case about the Known
13 Error Log and told them that there were 200,000 faults
14 in the live and test system on Horizon. This material
15 was known to the defence because Mr Jenkins told them.

16 In his 2012 statement in the Wylie case, Mr Jenkins
17 confirmed Fujitsu's ability to use remote access. This
18 was the first public confirmation of the position. This
19 statement was regarded in 2015 by Post Office and
20 Mr Parsons of Womble Bond Dickinson as going
21 significantly beyond that which Post Office had ever
22 confirmed about remote access. Mr Parsons described
23 that it would be a "red rag" to Second Sight.

24 The second obstacle is that Mr Jenkins never sought
25 to convey Horizon as infallible, rather, for example, he

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1 an expert, that he was not taken through expert duties,
2 that no steps were taken in his evidence to rectify that
3 none of his statements complied with the requirements of
4 expert evidence, that he wasn't asked any questions as
5 to why his statements didn't comply with the
6 requirements of expert evidence, that no one asked if he
7 had prepared his evidence compliantly with expert
8 duties, that this makes clear that the muddle on the
9 part of prosecutors as to what sort of witness he was
10 continued into his giving oral evidence.

11 Sir, I want to be clear at the outset of this
12 submission that it focuses, in part, upon the failure of
13 Post Office to instruct Mr Jenkins as an expert because
14 the key allegation that he has always faced is that, as
15 an expert witness, he breached expert duties by not
16 providing disclosure of bugs, errors and defects. The
17 fact that Mr Jenkins was not instructed as an expert is
18 critically important because the evidence that he gave
19 and how he provided it, was a product of the approach
20 which Post Office took to him and, specifically, the
21 communications which Post Office had with him as to what
22 his evidence was to address.

23 The Inquiry's evidence has proved the negative: that
24 he wasn't instructed as an expert in any case and so the
25 allegations against him have shifted to generalised

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1 advocated an approach of obtaining the data for a given
2 branch in order to see what may have happened.

3 The assessment of Mr Jenkins does not lie in
4 generalisations. It lies in the reconstruction of how
5 he was approached by Post Office lawyers, what evidence
6 he was asked to provide and how he responded. It lies
7 in the assessment of the information he did provide to
8 Post Office prosecutors and how they treated it, and why
9 some of that information never came to be recorded on
10 any disclosure schedule.

11 Sir, he did not lie. He sought to answer the
12 questions that Post Office lawyers asked him to address.
13 He was demonstrably not part of any approach which
14 sought to perpetuate Horizon as infallible.

15 Sir, my learned friends yesterday focused on events
16 after the Clarke Advice and the allegations of cover-up
17 about it. There is a very obvious irony that it was
18 Mr Jenkins' openness with Second Sight and his provision
19 of information about bugs to Second Sight that meant he
20 became subject to allegations of non-disclosure.

21 Mr Henderson of Second Sight contemporaneously
22 described Mr Jenkins as having been straight as a die.
23 When he was asked about this observation in his
24 evidence, Mr Henderson explained:

25 "He wasn't being evasive. He was happy to help. He

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1 was answering my questions. He provided promptly with
2 follow-up material that I requested. I mean, there was
3 no hesitation in his willingness to answer our questions
4 and to provide assistance.

5 "So he was willing to discuss remote access when
6 Post Office was not?"

7 "Yes."

8 Mr Henderson also explained:

9 "I saw him as a technical expert and that he
10 approached things from a technology perspective, almost
11 exclusively. He didn't strike me as a company person or
12 feeling that he had to stick to a particular party line
13 in terms of supporting Fujitsu. He was dealing with
14 things at a technical level as a technical expert and
15 I find that rather refreshing.

16 "Was he taking the defensive position that Post
17 Office was, which you describe in your statement?"

18 "No."

19 Sir, these points are not just important to
20 demonstrate that Mr Jenkins had provided Post Office
21 with information relevant to the operation of Horizon,
22 but that there was clearly no design, no strategy on his
23 part to withhold information. To the contrary, that he
24 provided guilelessly in the course of criminal cases the
25 sort of information that Post Office was claiming to

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1 and have been amnesiac until they have remembered things
2 that have been helpful to them.

3 Sir, Mr Jenkins was not that sort of witness. He
4 came and gave evidence before you for four days. He
5 answered all questions, despite the position he was in,
6 and he demonstrated himself to be incapable of putting
7 a self-serving gloss upon his evidence. He stands in
8 stark contrast to many of those who have given evidence
9 before you.

10 Before addressing some specifics, I wanted to make
11 three observations, if I may, three overarching
12 observations. The first is this: that Mr Jenkins was
13 an engineer in a legal world. Mr Jenkins was a computer
14 engineer to the core. He had been one for over
15 30 years, before being asked by Mr Pinder of the Fujitsu
16 Legal Support Team to help in Mr Thomas' case. He had
17 no legal training whatsoever, no training about being
18 an expert witness. He was involved in designing parts
19 of Horizon and, as part of his role as fourth line
20 support, in identifying the root causes of problems
21 which arose in Horizon.

22 He had been schooled by these decades of computer
23 engineering to think in terms of system and logic and
24 problem solving. As Mr Henderson said, this was a sort
25 of exclusively technological perspective. He was at

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1 have been unaware of.

2 Indeed, sir, it might have been thought that
3 Mr Jenkins' willingness to provide information to Second
4 Sight was another good reason to speak to him in 2013,
5 to investigate the circumstances in which he had given
6 evidence.

7 So we respectfully agree with those representing the
8 Huggell and the Hodge Jones & Allen Core Participants,
9 that there ought to have been an examination in 2013 of
10 the circumstances in which Post Office had used
11 Mr Jenkins. For, had that happened, it would have
12 demonstrated Cartwright King's involvement in obtaining
13 the very witness statements which Mr Clarke was
14 considering in his advice, an involvement which
15 Mr Atkinson, King's Counsel, has been so critical of in
16 this Inquiry.

17 It would have demonstrated Cartwright King's failure
18 to instruct Mr Jenkins as an expert and perhaps, sir,
19 most important of all, it may have revealed or begun to
20 reveal the sorts of prosecutorial incompetence that Post
21 Office's use of Mr Jenkins demonstrates, and which has
22 only been revealed here in this Inquiry.

23 About this Inquiry, sir. I pause at this point to
24 reflect on Mr Moloney, King's Counsel's, observation
25 about the witnesses who have come before this Inquiry

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1 a very considerable, if not total, remove from the type
2 of expert usually called in criminal proceedings.

3 It's not simply that he wasn't a professional expert
4 witness, that he wasn't giving evidence in a recognised
5 field of expertise, that he wasn't a member of an expert
6 institute, that he wasn't involved in research or bore
7 any of the hallmarks of a professional expert, but that
8 he was being called upon to give an opinion on the very
9 computer system he'd spent so many years working on and
10 continued to do so.

11 Some of my learned friends' submissions proceed as
12 though Mr Jenkins was appearing as a witness on a near
13 consistent basis. For example, my learned friends
14 Mr Moloney and Ms Patrick's written submissions suggest
15 that, time and time again, Mr Jenkins was reading expert
16 reports or meeting with experts or signing joint
17 reports.

18 Mr Jenkins was, at all times, a full-time and busy
19 engineer on Horizon. His involvement in cases was
20 sporadic and the nature of that involvement varied
21 greatly. As the Inquiry has seen, his involvement in
22 Mr Thomas' case in 2006 was limited to the issue of zero
23 transactions. He didn't encounter a defence expert
24 until his involvement in Mrs Misra's case in 2010, which
25 I'll come back to in detail. But this was the high

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1 point of his involvement in any of the Post Office's
2 criminal cases and the only one in which he gave
3 evidence.

4 In that case, Mr Jenkins and Professor McLachlan
5 made a short joint statement but, conspicuously, it did
6 not have an expert declaration on it. Mr Jenkins didn't
7 agree a document again with a defence expert until 2013,
8 in Mr Ishaq's case, and again, here, it's conspicuous
9 that this document was Ms Ibbotson's report with some of
10 Mr Jenkins' narrative added. The expert declaration was
11 Ms Ibbotson's alone. Indeed, the document was not
12 signed by Mr Jenkins.

13 After Mrs Misra's case, Mr Jenkins only made
14 a statement in one other case until the 2012 generic
15 statement. The nature of the generic statement and
16 Mr Jenkins' subsequent involvement in the 2012 and 2013
17 cases was very different again to Mrs Misra's case.

18 Sir, quite simply, the broad language of "time and
19 time again" is not borne out by consideration of the
20 detail. Rather, Mr Jenkins was an engineer navigating
21 from time to time a legal world he was unequipped and
22 untrained for, which alone would be concerning before
23 considering Post Office's purported use of him as
24 an expert.

25 He was entitled to trust the lawyers that he was
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1 Counsel, asked Mr Atkinson, King's Counsel, this:

2 "If it's right that the Post Office or its agents,
3 Cartwright King, later did not provide Mr Jenkins with
4 written instructions that conformed to the requirements
5 we've mentioned, didn't provide Mr Jenkins with
6 instructions as to his duties as an expert and none of
7 the statements included the necessary elements that
8 we've identified, would you be able to draw an overall
9 conclusion that there was a fundamental failure to
10 instruct Mr Jenkins as an expert?"

11 To which Mr Atkinson replied:

12 "Clearly, that's ultimately a conclusion for others
13 than me, but certainly, it's not a conclusion from which
14 I would dissent at all.

15 "With the limitation you have included, was it
16 a persistent failure?"

17 "Yes."

18 Sir, the evidence overwhelmingly demonstrates that
19 Post Office did not provide Mr Jenkins with written
20 instructions that conformed to the requirements of
21 instructions for expert evidence. Written
22 communications with him didn't even approximate expert
23 instructions.

24 The evidence goes much further. The failures were
25 not simply those of omission; they were failures of
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1 dealing with and to trust that they were competent and
2 acting lawfully, indeed people like Mr Singh, who had
3 the Post Office endorsement of being a senior lawyer, or
4 the Head of Criminal Law. Mr Jenkins didn't have the
5 framework to know that what any of these lawyers were
6 saying or doing was wrong or to challenge them. It's
7 important to emphasise, sir, that, in Mr Jenkins' case,
8 every single lawyer and investigator with whom he dealt
9 was incompetent or acted in ways that was inconsistent
10 with their duties.

11 Sir, you need only think of the case studies before
12 you to see this. Mr Ward and Ms Matthews in Mr Thomas'
13 case; Mr Singh in Mrs Misra's case; Mr Singh in relation
14 to the generic statement; and then Mr Bowyer, Mr Smith
15 and Mr Bolc, and the very junior paralegal, Ms Panter,
16 in the 2012 and 2013 cases.

17 As Mr Smith of Cartwright King observed:

18 "Quite why Cartwright King thought it was
19 appropriate to take on prosecution work, really, with
20 hindsight, I've no idea because we certainly didn't have
21 the training for it and I was unaware of the duties on
22 a prosecutor in relation to the instruction of an expert
23 witness."

24 Sir, the second overarching point: Mr Jenkins was
25 never instructed as an expert. Sir, Mr Beer, King's
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1 commission. Lawyers misstated to Mr Jenkins what his
2 role was or what the evidence was he was to give. Post
3 Office didn't provide Mr Jenkins with instructions as to
4 his duties as an expert. There isn't a single document
5 before this Inquiry in which Post Office provided
6 Mr Jenkins with these instructions. Every single lawyer
7 who has appeared before you conceded that they had not
8 Mr Jenkins as to expert duties and, sir, I include
9 Mr Warwick Tatford in that for reasons which I will
10 return to. So sir, none of the statements included the
11 necessary inclusions to make it admissible as expert
12 evidence.

13 Sir, the third overarching point: the fact that
14 Mr Jenkins was never instructed as an expert cannot be
15 treated as irrelevant.

16 Sir, this third point can be made shortly: it is
17 impossible to treat as irrelevant that Mr Jenkins was
18 not instructed as an expert. In other words, to take
19 an approach to Mr Jenkins which accepts that he was not
20 instructed as an expert but which proceeds on the basis
21 that this does not matter and that his evidence in
22 criminal proceedings can be looked at in isolation from
23 the manner of his instruction or how he was used by Post
24 Office. That would not be a sustainable forensic
25 exercise and would be unfair for these reasons: first
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1 and fundamentally, Mr Jenkins was not being treated as
2 a witness of fact. He was being asked questions to
3 undertake work to respond to expert reports in
4 Mrs Misra's case and to provide opinions. In short, he
5 was being asked to provide evidence and being put in
6 a position that no witness of fact would be put in.

7 As stated already, the evidence that he gave and how
8 he gave it was a product of Post Office's approach to
9 him and, specifically, the product of communications
10 with Post Office had with him about what his evidence
11 was to address. It was impossible to disentangle these
12 from each other and it applies to every single case
13 study.

14 Third, it would also overlook that the evidence that
15 Mr Jenkins gave was in the context of a series of
16 grossly defective communications which misrepresented
17 his role and the sort of evidence that he was to give.
18 Again, this was a feature of every single case study.

19 Far from prosecutors sending the message that
20 Mr Jenkins was to be treated as independent or, for
21 example, his evidence as independent, they informed him,
22 for example, "You are our Horizon expert. You're
23 an expert for Fujitsu", that he rebut and disprove or
24 discredit what the defence were alleging, that he
25 preserve the Horizon system.

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1 instructed as an expert, is that it would hold
2 Mr Jenkins to the standards and duties of an expert
3 witness when he was a layperson, uninstructed and
4 uneducated in those standards and duties.

5 Sixth, this approach would negate the importance
6 attached to the duties on lawyers when they instruct
7 an expert to ensure that they understand the content of
8 expert duties.

9 Sir, that is all by way of introduction, and
10 I wanted, if I may, to deal with some specific points.
11 But before I do, sir, to thank the Inquiry and
12 particularly all of those whose very hard work has
13 enabled a forensic reconstruction of how number of the
14 case studies were prosecuted. It's only by that process
15 that it's been possible to demonstrate that Post Office
16 failures in relation to Mr Jenkins were part of a much
17 broader canvas of prosecutorial failure.

18 Of these failures, the most significant which relate
19 to Post Office's use of Mr Jenkins is its failure to
20 understand that the Criminal Procedure and
21 Investigations Act applied to it as a holder of material
22 relevant to its prosecutorial function.

23 In other words, sir, that Post Office elected to
24 prosecute at scale without ever having understood that
25 it had a statutory obligation to ensure that information

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1 These are just examples of what lawyers told
2 Mr Jenkins that his role was and yet, despite that,
3 Mr Jenkins provided precisely the sort of information to
4 Post Office that he is being accused of having withheld.

5 This was an approach in 2012 on the part of both
6 Mr Singh and the Cartwright King lawyers which
7 Mr Atkinson, King's Counsel, described as "woefully
8 inadequate" or the antithesis of how an expert should
9 have been instructed.

10 Fourth, Mr Jenkins was also, in his purported
11 capacity as an expert, being asked to undertake
12 functions which were those of the prosecutor and which
13 he should not have been asked to do. I will deal with
14 disclosure as a separate topic but, for example, you
15 know, sir, that he was sent the Defence Case Statement
16 in Mrs Misra's case and, in Mr Ishaq's case, asked to
17 comment on it. That should never have happened. It is
18 the prosecutor who is charged with the statutory
19 obligation of considering disclosure in light of
20 a Defence Case Statement; it is not the duty of
21 a witness. You might think, sir, that that was just
22 another example of Post Office delegating to a witness
23 functions that were its.

24 Fifth, the unfairness of this approach, that is of
25 treating it as irrelevant that Mr Jenkins was not

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1 it held about the operation of Horizon was retained and
2 recorded, and potentially revealed for the purposes of
3 the CPIA.

4 The second is Post Office's failures to make
5 properly considered and properly formulated third-party
6 disclosure applications to Fujitsu.

7 The third significant failure is that investigators
8 and prosecutors consistently did not discharge their
9 statutory obligations under the CPIA in individual
10 cases. In other words, that information or material
11 that fell to be included on unused schedules was not
12 recorded on, them, and was not disclosed to the defence.

13 This was a feature of every single case study in
14 which Mr Jenkins featured. Had that happened, had
15 drafts of his witness statements or communications with
16 him been listed on the unused schedule, then the picture
17 would be a profoundly different one.

18 The fourth, sir, is the failure on the part of every
19 Post Office investigator, lawyer and external lawyer in
20 the case studies, in which Mr Jenkins featured, to
21 discharge the obligations on a prosecutor where they
22 seek to rely on expert evidence.

23 Returning to Mr Jenkins and setting him against this
24 canvas. Well, despite his being a Fujitsu engineer,
25 despite his lack of experience, all of that, there was

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1 no recognition on the part of any lawyer that this made
 2 it imperative that, if he was going to be relied upon as
 3 an expert, that, first, he was actually instructed as
 4 one; second, that he understood that his evidence had to
 5 be independent, that he was providing evidence to the
 6 court, not on behalf of Fujitsu or Post Office; that
 7 this made him subject to the special expert duties.
 8 What those duties were and how they applied to him and,
 9 in particular, how the duty of disclosure might apply to
 10 him and how he might go about discharging that duty.

11 As Mr Atkinson put it:

12 "Even with the professional expert witness, even if
 13 you are singing to the choir, a prosecutor instructing
 14 an expert should ensure that they understand these
 15 duties to which they are subject."

16 It is just extraordinary that no lawyer ever saw any
 17 need to circumstances with Mr Jenkins the very distinct
 18 and unusual position that he was being put into.

19 The instruction of an expert is usually a carefully
 20 considered step in litigation, not undertaken lightly.
 21 The discipline of drafting a letter of instruction means
 22 that proper consideration is given to what the expert is
 23 being asked to address. This isn't advanced lawyering,
 24 this is the material of everyday work.

25 In 2005 and 2006, the subject of expert evidence had
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1 that they saw no need to apply this law to their
 2 prosecutions?

3 This may go to a point I understand my learned
 4 friend Mr Moloney to make: that it is suggestive of some
 5 sort of sense of exceptionalism. But whatever you might
 6 conclude, sir, Post Office just didn't have this kind of
 7 guidance. In fact, a series of investigators and
 8 lawyers lined up to tell you that they did not know
 9 about the duties on them when they instructed an expert.

10 Sir, I am going to deal, if I may swiftly, with some
 11 matters of chronology.

12 Sir, first of all, as regards -- and I start in
 13 2005, sorry, I should have said, with Mr Castleton's
 14 case, and about the 2005 Bond Pearce letter. You'll
 15 recall, sir, that this was a letter addressed to Fujitsu
 16 in November 2005 and related to Mr Castleton's
 17 proceedings. Time doesn't permit me to deal with that
 18 at any length but I notice that none of the Core
 19 Participants have sought to seriously contend that this
 20 letter put Mr Jenkins on notice that expert duties
 21 applied to him, still less that it would have meant that
 22 he understood the content of expert duties, how they
 23 applied to him and that he would have carried this
 24 knowledge with him in the years to come.

25 It is dealt with in the written submissions on his
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1 been an intense focus on the part of the Court of
 2 Appeal. Criminal lawyers had been reminded that the
 3 *Ikarian Reefer* applied to criminal litigation. This in
 4 turn had been reflected in the Criminal Procedure Rules
 5 and, in March 2006, the CPS produced its own guidance
 6 specific to how experts were to discharge the duties of
 7 disclosure when they were instructed by the CPS, and
 8 that guidance, pithy though it is, encapsulated core
 9 concepts: concepts like recording, revealing and
 10 retaining; it explained what unused material was; it
 11 explained the requirement that the expert retain
 12 everything that they generated in the course of their
 13 work, for example explanations that they had been
 14 provided with.

15 The CPS discharged its obligations to ensure that
 16 the expert understood this by requiring them to sign
 17 a declaration of understanding. Sir, if Post Office was
 18 going to use powers of private prosecution against
 19 subpostmasters, to do so routinely and knowing that it
 20 put them at risk of conviction, of imprisonment, of
 21 financial loss, why wasn't Post Office or its
 22 prosecutors abiding by Court of Appeal judgments, by the
 23 Criminal Procedure Rules, or promulgating this sort of
 24 guidance? What does that say about the culture and
 25 ethos of the organisation and the lawyers within it,
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1 behalf but the fact alone that it was sent to Mr Jenkins
 2 when it was not in contemplation that he would be
 3 a witness may be the best indicator that it wouldn't
 4 have seemed terribly significant to him at the time.

5 Sir, of course, in the Castleton litigation, it was
 6 decided that Mr Jenkins would be a witness of fact, and
 7 on that basis, Mr Dilley prepared a statement for him.
 8 Mr Jenkins refused to agree to making this statement,
 9 that there were no grounds for believing that the
 10 problems that Mr Castleton said he experienced with his
 11 computer would have caused either theoretical or real
 12 losses. As Mr Jenkins noted on the statement, this was
 13 not something he felt able to agree with, without
 14 looking more closely at what had gone on.

15 Sir, this is a complete answer to the allegation
 16 made by my learned friends Mr Moloney and Ms Patrick in
 17 their written submissions: that Mr Jenkins had been
 18 a party in Mr Castleton's case to Mr Pinder's obvious
 19 attempt to remove ambiguity or nuance from Fujitsu's
 20 message in that case, that the problem was not theirs
 21 but the SPMs, or to avoid a close examination of the
 22 data. It was exactly that, a close examination of the
 23 data, which Mr Jenkins was advocating was needed in
 24 Mr Castleton's case.

25 Sir, we have dealt with Mr Jenkins' willingness to
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1 use the term "system failure" in Mr Thomas' case and
 2 that the opposition to it was entirely that of Mr Ward,
 3 in written submissions, so I won't expand on that
 4 orally. But, sir, I did wish, through Mr Thomas' case,
 5 to make some submissions on the issue of the boilerplate
 6 paragraphs.

7 Sir, we invite the Inquiry to consider with care any
 8 claim that it was understood by Post Office lawyers or
 9 investigators that the boilerplate paragraphs were
 10 attesting to the integrity of the Horizon system. These
 11 paragraphs were a standard part of every statement made
 12 by Ms Lowther and Ms Thomas when they produced the ARQ
 13 data. Ms Lowther and Ms Thomas were not technicians.
 14 The idea that, by producing this ARQ data, which is
 15 understood would normally have been for limited periods,
 16 they would have understood themselves to be attesting to
 17 the integrity of the entire system seems far fetched.

18 So the Inquiry did not hear from Ms Lowther and
 19 Ms Thomas, so it has no direct evidence from them as to
 20 what they understood the boilerplate passages to mean
 21 and, in respect of Ms Thomas, this is particularly
 22 significant, given that she wrote the Litigation Support
 23 manuals in force at important times.

24 However, the evidence strongly suggests that these
 25 apology plate passages related to their production of

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1 Ms Thomas' line manager, Ms Munro's, understanding, in
 2 her words, about the boilerplate paragraphs, was that
 3 they were in regards to the audit workstations where
 4 they retrieved the data from, rather than the integrity
 5 of the Horizon system itself, how they pulled the data
 6 off, rather than the Horizon system.

7 This was something that Mr Lenton, heavily involved
 8 in the civil proceedings, also said:

9 "My understanding is that it's referring to the
 10 audit retrieval system.

11 "You didn't understand it to be a generalised
 12 comment about the integrity of the system?"

13 "No."

14 Finally, Duncan Atkinson, King's Counsel, agreed
 15 that the meaning of the boilerplate paragraphs was not
 16 altogether clear, at least open to interpretation Sir,
 17 if Mr Duncan Atkinson considers that they are open to
 18 interpretation it should give real pause before the
 19 conclusion that they are only capable of one meaning is
 20 arrived at.

21 Returning to Mr Jenkins, the boilerplate paragraphs
 22 were in the draft statement that Ms Lowther prepared for
 23 him in Thomas. As he explained in his Inquiry
 24 statement, having queried how he could include these
 25 paragraphs when he had only been provided with the

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1 the ARQ data. Indeed, it's respectfully submitted, sir,
 2 this must be correct. First, for the reason just
 3 alluded to: that neither of them could possibly speak to
 4 the overall integrity of the system, and sir, I use that
 5 term cognisant of the fact that it's not a term of art
 6 and it doesn't have a statutory meaning.

7 Ms Thomas and Ms Lowther could, however, speak to
 8 the process by which they had extracted the ARQ data.
 9 The standard statements producing the data set out the
 10 processes which resulted in the data being stored in the
 11 audit server and the processes, by which the ARQ data
 12 was produced. In other words, the substantive content
 13 of the statement was consistent with the ability of them
 14 to attest to the production of the ARQ data.

15 The Fujitsu manuals provided for a detailed,
 16 process-driven mechanism by which the ARQ data was to be
 17 produced. The manuals did not provide at all for any
 18 other process, which needed to be gone through in order
 19 to make the boilerplate statements. It's unthinkable
 20 that guidance intended to regulate the making of the
 21 statement for producing ARQ data would make detailed
 22 provision for that but not provide any guidance to
 23 non-technicians as to how they were supposed to attest
 24 to the overall working of the Horizon system.

25 You may not have heard from her but you do know that

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1 spreadsheets of the zero transactions, he believes that
 2 he would have spoken to Ms Lowther and Ms Thomas about
 3 them. He sought to explain in his oral evidence what he
 4 thought these paragraphs meant in his statement in
 5 Mr Thomas' case, and he did explain that he thought the
 6 paragraphs related to the computers involved in the
 7 production of that, so not just the typing up, but
 8 actually the extraction of the ARQ data as well.

9 Sir, besides the point in Mr Thomas' case that he was
 10 only commenting on the zero transactions, Mr Jenkins was
 11 emphatic that he would not have described the Horizon
 12 system as a "computer". It simply wouldn't have made
 13 any sense to him.

14 Sir, I turn then to Mrs Misra's case.

15 What emerged clearly from the evidence in
 16 Mrs Misra's case was that Mr Jenkins was being asked to
 17 do three separate things: he was being asked to deal
 18 with Post Office's disclosure obligations under the
 19 CPIA, but never actually told that; he was being asked
 20 to respond to Professor McLachlan's report; and he was
 21 also being asked, in Mr Tafford's words, to assist
 22 Professor McLachlan. Over time, those three things
 23 became conflated and confused.

24 For all of the reasons set out in our written
 25 submissions, insofar as Post Office sought to discharge

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1 its disclosure obligations through Mr Jenkins, this was
2 an impermissible delegation of its statutory duties.
3 But that aside, Post Office did not tell Mr Jenkins or
4 Fujitsu that it was doing this. It didn't explain to
5 him or Fujitsu what its disclosure obligations were. It
6 did not explain to him or to Fujitsu what might be
7 potentially relevant.

8 Relatedly, prosecutors did not address the capacity
9 in which they were using Mr Jenkins. Mr Tatford
10 conceded this: neither he nor Mr Singh confronted what
11 their reliance on Mr Jenkins amounted to. There was no
12 point at which this crystallised in Mrs Misra's case.

13 According to Mr Tatford, until Mr Jenkins came to
14 provide his final statement, he was not being treated as
15 an expert witness. This is what Mr Tatford called the
16 "muddled thinking" about Mr Jenkins' role, which, in his
17 words:

18 "... tarnished the thought process throughout
19 Mr Jenkins' instruction, and I regret that. It was
20 a mistake."

21 In an important passage of his evidence, he went on
22 to explain, when he was asked why none of the statements
23 had the necessary content to be expert statements, he
24 said that he thought that they should have been in all
25 of the statements and that he thought this at the point

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1 with him, Mr Jenkins provided to Post Office the sort of
2 information it purported to be seeking. Mr Jenkins
3 provided information to prosecutors which was never
4 explored. Neither Mr Singh nor Mr Tatford asked any
5 questions when Mr Jenkins said he couldn't give a clear
6 answer to whether there were problems with Horizon.
7 They never asked any questions about the locking problem
8 which caused transactions to be lost, still less ensured
9 that this was recorded on the unused schedule. Neither
10 asked about the process about which Fujitsu checked NT
11 events.

12 Mr Singh and Mr Tatford were well aware that
13 Mr Jenkins didn't know anything about the Callendar
14 Square bug, but didn't ask what records Fujitsu kept of
15 previous issues that had affected accounts. It was
16 Mr Jenkins who had to press and press in the face of
17 resistance, that the ARQ data from Mrs Misra's branch be
18 obtained and that, for example, the full message store
19 be provided to Professor McLachlan.

20 The argument that he sought to withhold information
21 about bugs and problems in Horizon is wholly undermined
22 by the fact that he informed Professor McLachlan about
23 the Known Error Log and the 200,000 faults on the test
24 and live system. Mr Jenkins also informed the
25 prosecutors that Fujitsu might be able to provide

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1 at which the final statement was made.

2 He thought that the final statement should have
3 complied properly with the CPR but it didn't because
4 there was only two days left before trial.

5 Of course, sir, that statement did omit the
6 necessary content, and Mr Tatford's explanation doesn't
7 make much sense when one has regard to the fact that he
8 was able to make quite extensive comments on that draft
9 statement and suggest that Mr Jenkins say -- which
10 Mr Jenkins said no to -- that it was more likely that
11 Mrs Misra had stolen the money than that the loss could
12 be explained by computer error. Again, sir, you may
13 reflect on what that says about Mr Jenkins.

14 Also important in this regard is his concession
15 that, in seeking to change what Mr Jenkins said, that
16 this was not consistent with the concept of Mr Jenkins
17 as an expert evidence (*sic*).

18 Sir, you'll have in mind what Mr Tatford finally
19 said in his evidence: that he felt worse because it had
20 been quite clear in the way that the evidence was
21 properly put before him that there were many failings
22 that he had ignored on his part, and:

23 "... perhaps created a rosier version in my memory
24 that wasn't really there."

25 Sir, despite the series of defective communications

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1 Professor McLachlan with the information about the
2 system changes sought in the disclosure request. By
3 18th August 2010, Mr Jenkins spoke to his colleagues
4 within Fujitsu and told them what he thought this
5 exercise would involve, including the collation of PEAKS
6 and change proposals. In other words, Mr Jenkins put
7 into motion the scoping exercise to provide Post Office
8 with all of the PEAKs related to the issues which had
9 required changes to be made to the counter.

10 This is precisely the sort of information which
11 Mr Jenkins is being criticised for not having provided,
12 yet it was there for the taking by Post Office, and the
13 only reason why it wasn't is because Post Office refused
14 the defence requests for disclosure of that information
15 in Mrs Misra's case.

16 Sir, I'm going to deal, finally, with the receipts
17 and payments mismatch bug, a bug that Mr Jenkins was
18 accused by Post Office of not disclosing. As this
19 Inquiry has uncovered, in fact Post Office lawyers were
20 well aware of it and decided that it did not need to be
21 disclosed in Mrs Misra's case. The Court of Appeal was
22 not told that.

23 Mr Jenkins was emphatic that, from his technical
24 perspective, a bug that occurred in Horizon Online in
25 2010 had no logical connection with Mrs Misra's case,

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1 that she experienced problems in Horizon in 2005 and
2 2006. His was the technician's perspective. The
3 Inquiry can now assess the position knowing that the
4 issue wasn't that Mr Jenkins concealed that bug from
5 Post Office. Indeed, it was well known about and the
6 options for remedying it within Post Office. It can
7 assess the position known that those statutorily charged
8 with making disclosure decisions elected not to disclose
9 it.

10 The main point which appeared to be put by my
11 learned friend Mr Henry, King's Counsel, about the
12 receipts and payments mismatch bug, in relation to
13 Mrs Misra's trial was that it wasn't disclosed because
14 it would have revealed the possibility of remote access.

15 Sir, that argument assumes that Mr Jenkins would
16 have thought that the fact that there was remote access
17 into Horizon meant that cases couldn't be prosecuted or
18 that revealing the fact of remote access would have had
19 a significant impact upon prosecutions.

20 There is no evidence that Mr Jenkins ever thought
21 this. Indeed, the fact that he made the statement in
22 the Wylie case in 2012, confirming that there was remote
23 access is to entirely opposite effect.

24 There is no evidence that he knew that remote access
25 was ever done in a way so that the SSC left no trace of

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1 which could be served in any case in which Horizon was
2 raised -- as inconsistent with the duties of
3 a prosecutor because, fundamentally, it meant that
4 prosecutions were not being considered on a case-by-case
5 basis.

6 Mr Bowyer formulated the four questions that
7 Mr Jenkins was to answer. In order to answer these
8 questions, Mr Jenkins was sent the Helen Rose Report and
9 spreadsheet, in other words information that Post Office
10 had gathered about cases it had prosecuted in which
11 Horizon issues had been raised. It is wholly unclear
12 why anyone thought that Mr Jenkins should be providing
13 evidence about matters which were wholly within the
14 provenance of Post Office, and unconnected with him.
15 Again, you might think another attempt to delegate to
16 him matters for which Post Office was responsible.

17 In terms of the email that Mr Singh sent Mr Jenkins,
18 instructing him, so to speak, well, sir, that's the
19 email that you've already heard described as the
20 antithesis of how any expert should be approached.

21 Mr Jenkins provided his answers to the questions by
22 way of a technical Fujitsu report and sought the input
23 of others. However, they and he clearly understood that
24 it was to be expressed at quite a high level, reflected
25 in its content. Mr Jenkins provided the overview sought

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1 it in the audit trail. Mr Jenkins was sent a single
2 email by Mrs Chambers in 2006 when she mentioned access
3 at the counter. There's no reply from him and he's not
4 mentioned in the subsequent PEAK, but there's nothing in
5 that email to suggest that access at the counter meant
6 that the SSC obtained access and changed data but didn't
7 leave any trace of that in the audit trail.

8 In his paper, in the R&P mismatch bug, Mr Jenkins
9 set out a proposal for the correction of the data at
10 each branch and said:

11 "We need to agree a timetable with Post Office to
12 correct the other branches and ensure that this is
13 communicated with the branches to ensure that everyone
14 is happy."

15 Put shortly, Mr Jenkins foresaw a process of
16 correcting the bug as one which entailed the consent of
17 both the Post Office and the affected SPMs. His note
18 did not refer to any ongoing prosecutions, still less
19 any concerns about them.

20 Sir, I turn briefly then to 2012. Sir, there is no
21 doubt that the generic statement conceived by Mr Bowyer
22 of Cartwright King was part of a response to the
23 commission of the Second Sight review and that it was
24 poorly conceived. Mr Atkinson regarded the approach
25 taken -- in other words to formulate a general statement

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1 as to how the Horizon system worked. He explained that
2 he had no knowledge of 21 of the cases that Ms Rose
3 referred to.

4 That report was in turn turned into the witness
5 statement and subject to editing by Post Office and
6 Cartwright King lawyers. In particular, the part of the
7 report that explained that Mr Jenkins didn't know about
8 the vast majority of cases that Ms Rose alluded to was
9 taken out.

10 Consistent with Mr Jenkins's report, the statement
11 continued to explain the Horizon system at a high level.
12 It explained the challenges to Horizon that Mr Jenkins
13 himself was familiar with. The evidence does
14 demonstrate that Mr Jenkins wasn't clear about the use
15 to which it was going to be put. Ms Jennings'
16 contemporaneous email of 19 October 2012 said that she
17 had put the statement into a Section 9 format, and that
18 she'd been in contact with Mr Jenkins, and that he
19 didn't know that it related to a specific case, and that
20 he wasn't aware that he would be required in court.

21 It was after this point that Mr Jenkins was
22 contacted by Ms Panter and told that she intended to use
23 his statement. It was in that email that she told
24 Mr Jenkins:

25 "It doesn't matter that you haven't mentioned

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1 a specific case in your report because there haven't
2 been any specific criticisms raised by any of the
3 defendants provided in my list of cases."

4 It's important to be clear, sir, that what
5 Mr Jenkins was being told by the prosecutors was that
6 his generic statement would be used in cases in which no
7 specific criticism of Horizon had been made.

8 Those representing the Hudgells Core Participants
9 submit that the generic statement itself demonstrates
10 that Mr Jenkins's position was always to start with
11 a set view of likely evidence but this isn't correct,
12 because the evidence in the Allen, Sefton and Nield and
13 Ishaq cases show that Mr Jenkins made clear when Post
14 Office were proposing using the generic statement,
15 having been told that no specific criticism was made,
16 that he pressed that ARQ data could be obtained for
17 those branches and what it might show.

18 In Mr Allen's case, he made clear to Mr Bolc that
19 the ARQ data could demonstrate exactly what had
20 happened. Mr Bolc understood that. He communicated to
21 Mr Bradshaw:

22 "Gareth tells me that it is in fact possible for him
23 to retrieve the actual data to see what actually
24 occurred in the branch."

25 But Mr Bolc said no to obtaining that data and,
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1 Sir, I remind you again of what Mr Atkinson KC said
2 about this in his usual understated terms:

3 "Well, it's moderately remarkable to expect any
4 Witness, but certainly an expert witness, to deal with
5 complex issues and to try to narrow down those complex
6 issues with another expert, not knowing what the expert
7 said, not knowing what material they had seen, not being
8 able to check either anything that they had said or that
9 they have seen. I can't quite think how anyone thought
10 that was a good idea."

11 Sir, it's very hard to see how Mr Jenkins could be
12 responsible for what happened in the Ibbotson case. He
13 came to court and he did his best to deal with the
14 situation that confronted him.

15 Sir, may I end by saying this -- and, sir, you're
16 probably smiling at me because you know that my hour is
17 about up.

18 **SIR WYN WILLIAMS:** I have a very reliable time piece here,
19 Ms Dobbin.

20 **MS DOBBIN:** Maybe your reliable timekeeper will be slightly
21 less reliable --

22 **SIR WYN WILLIAMS:** I'll allow you a conclusion --

23 **MS DOBBIN:** -- for a couple of minutes.

24 **SIR WYN WILLIAMS:** Don't let's lose time for you.

25 **MS DOBBIN:** Of course. Sir, a public inquiry isn't a trial.
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1 similarly in the cases of Ms Sefton and Ms Nield,
2 Mr Jenkins suggested the issues that could be looked
3 into but, again, Mr Bolc rejected obtaining the audit
4 data.

5 In summary in these cases, despite being told that
6 they did not raise Horizon issues, Mr Jenkins went on to
7 explain what the ARQ data could be used for, and
8 Mr Atkinson observed of this that what Mr Jenkins was
9 offering to undertake would have been more in line with
10 Post Office's duties as a prosecutor, both in terms of
11 reasonable lines of inquiry and disclosure, and that
12 their refusal to do this was clearly a missed
13 opportunity for which little justification was offered.

14 Sir, I don't have time to deal with the disaster
15 that was the prosecution of Mr Ishaq but it says
16 everything about how Cartwright King conducted
17 prosecutions. It suffices for my part to remind you
18 today that Mr Jenkins was asked to turn up on the first
19 day of that trial in order to deal with a defence
20 expert, in circumstances where he had seen no defence
21 expert report and hadn't even been provided with any of
22 the materials that the defence expert had. He spent the
23 first day and night of the trial trying to ascertain the
24 extent to which he agreed with Ms Ibbotson's analysis as
25 to how the loss figure had been calculated.
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1 The rules don't require allegations to be put to
2 witnesses. It's not unusual for different theories to
3 be put to witnesses or even inconsistent cases to be put
4 to witnesses by different Core Participants.

5 But, in respect of Mr Jenkins, if the allegation is
6 that he failed to disclose bugs or was part of an effort
7 to convey Horizon as infallible, or that he sought to
8 conceal that there was information available that would
9 reveal problems in Horizon, or to conceal that there
10 were investigations that could be carried out at
11 a branch to investigate what may have happened, then
12 those points are, in my respectful submission,
13 unsustainable, having regard to his consistent approach.

14 Starting in March 2006 with his being entirely happy
15 to use the language of "system error" in his statement
16 in Mr Thomas' case, his genuine lack of understanding as
17 to why Mr Ward had any problem with the use of those
18 words, it's demonstrated by his providing an explanation
19 of the PEAK system in his draft statement in Mr Thomas'
20 case, explaining quite openly:

21 "Fujitsu have a fault management system called the
22 PEAK system which is used for passing faults around the
23 team and tracking faults raised regarding the Post
24 Office Account."

25 It's demonstrated by, in May 2006, his unwillingness
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1 to sign up to the language of Mr Dilley in
 2 Mr Castleton's case, unless there had been
 3 an examination of the data.
 4 It's demonstrated in February 2010 by his absolute
 5 insistence in Mrs Misra's case that the branch data be
 6 obtained so that he and Professor McLachlan could
 7 examine it, in the face of POL resistance that had been
 8 going on for months by that point.
 9 It's demonstrated again in February 2010 by his
 10 immediate answer in Mrs Misra's case of whether there
 11 are known problems, that, yes, he could not make a clear
 12 statement because transactions could be lost due to
 13 locking issues.
 14 It's demonstrated in March 2010 by his suggestions
 15 at the end of his statement on 9 March about other
 16 aspects of the data that could be looked at in
 17 Mrs Misra's case.
 18 It's demonstrated in July 2010 by the information
 19 which Mr Jenkins gave to Professor McLachlan and which
 20 led directly to the defence requests for the disclosure
 21 of the Known Error Log, the system change requests, the
 22 new release documentation, again by his guileless
 23 reference to the fact that there were 200,000 faults in
 24 the Horizon system.
 25 It's demonstrated in August 2010 by the fact that
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1 high level rough analysis of this stuff."
 2 His concession that he had no way of knowing whether
 3 money was lost due to theft and that he could not say
 4 that any money had been lost in Mrs Misra's case.
 5 It's demonstrated in September 2012 by his mindset
 6 and approach towards Second Sight and openly discussing
 7 bugs in Horizon and remote access with them.
 8 It's demonstrated by what he said in the statement
 9 in Ms Wylie's case.
 10 It's demonstrated by his approach in October 2012
 11 and February 2013 by his attempts to explain that there
 12 was ARQ data that he was willing to examine and which
 13 might show what had happened at the branches in
 14 question.
 15 Sir, Mr Jenkins was an engineer in a legal world.
 16 He was navigating it without essential tools that he
 17 ought to have been provided with by Post Office and by
 18 Fujitsu. Despite that and despite the obstacles put in
 19 his path by lawyers, he took an honest technician's
 20 approach: providing the information that Post Office
 21 purported to want. The issue was not the lone expert.
 22 It was Post Office and its lawyers.
 23 **SIR WYN WILLIAMS:** Thank you.
 24 **MS DOBBIN:** Sir, thank you.
 25 **SIR WYN WILLIAMS:** We'll start again at 2.15 -- no, 2.20.
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1 Mr Jenkins was willing to undertake and set in motion
 2 an assessment of what he thought could be provided to
 3 the defence, including every counter release applied to
 4 the live estate in the last seven years, a list of the
 5 PEAKs, the change proposals that had been addressed in
 6 that period. Again, I remind you, sir, it was Post
 7 Office who refused to disclose that.
 8 It is demonstrated in October 2010 by his provision
 9 of the PEAK in the Callendar Square case to Professor
 10 McLachlan.
 11 It's demonstrated again in October 2010 by his
 12 objections to the changes that Mr Tatford had proposed
 13 to his witness statement, including that he refused to
 14 give an opinion to the effect that it was more likely
 15 that Mrs Misra had stolen money than the loss being
 16 explained by a computer error.
 17 It is demonstrated again by the evidence he gave at
 18 Mrs Misra's trial which was modest and which made clear
 19 its limits. It included his acceptance that there could
 20 be Horizon issues that he didn't know about that could
 21 have affected Mrs Misra's branch, given that he hadn't
 22 known about Callendar Square.
 23 His caveated response to the question whether he had
 24 seen the slightest symptomatic of a computer fault at
 25 West Byfleet, his answer: "I've been doing the sort of
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1 No, I think 2.15 is okay.
 2 2.15 for Mr Chapman.
 3 **(2.06 pm)**
 4 **(A short break)**
 5 **(2.17 pm)**
 6 **SIR WYN WILLIAMS:** Mr Chapman.
 7 **Closing submissions by MR CHAPMAN**
 8 **MR CHAPMAN:** Sir, I make this closing statement on behalf of
 9 the Department for Business and Trade.
 10 **THE STENOGRAPHER:** Your microphone is not on.
 11 **MR BEER:** Sir, might I suggest that Mr Chapman swaps seats
 12 and comes forward to the seat that Mr Moloney normally
 13 occupies?
 14 **SIR WYN WILLIAMS:** Far be it from me to think that Mr Henry
 15 has deliberately muted him!
 16 **MR STEIN:** Ms Pepper, can you confirm this one is working?
 17 This one is?
 18 **MR CHAPMAN:** Right? Is that better? Yes. Right, trying
 19 again.
 20 Sir, I make this closing statement on behalf of the
 21 Department for Business and Trade. As the Department
 22 has stated on many occasions in the course of this
 23 Inquiry, in Parliament and elsewhere, the Horizon
 24 scandal is truly appalling. No one in this room needs
 25 reminding of the devastation to so many good people's
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1 lives, the trashed reputations, the financial ruin, the
2 dreams unrealised, the chances lost, the families and
3 communities weakened and divided and, of course,
4 innocent and good people thrown in jail and, in those
5 especially tragic cases, driven to suicide.

6 The Post Office itself bears principal
7 responsibility for this scandal but it did not act
8 alone. Indeed, as a corporate body, the Post Office was
9 a manifestation of its people and the culture that they
10 inculpated and embodied. It acted in the despicable way
11 that it did because of the choices of those people,
12 individually and collectively.

13 This scandal involves a cast of characters from
14 inside and outside the Post Office, including, but by no
15 means limited to, the Post Office Board and Executives,
16 staff in its Branch Support, Communications, IT and
17 Security Investigation Teams, employees of Fujitsu, the
18 NFSP leadership, Central Government and its agencies
19 and, perhaps most invidiously and reprehensibly of all,
20 lawyers.

21 All contributed in their own way to this scandal,
22 for the Horizon scandal is not merely about hopelessly
23 buggy IT software, unchecked backdoors, poor quality
24 hardware, superficial training and a helpline that
25 provide anything but help. Those were certainly causes

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1 relation to Horizon and, ultimately, it failed to
2 escalate and expose the right information to the right
3 people in Government.

4 The Shareholder Executive, ShEx, was, until 2016,
5 a Directorate within the Department itself and,
6 therefore, the Department must accept direct
7 responsibility for ShEx's failures, whether structural
8 or individual.

9 The fact that ShEx's functions were assumed by UKGI
10 in 2016 does not absolve the Department of
11 responsibility for mistakes after that point. The
12 Department recognises that it retained ultimate
13 responsibility for overseeing the Post Office, and that
14 it was ultimately responsible and accountable for the
15 arrangements in place for doing so. That the Department
16 delegated its responsibilities to UKGI, which acted
17 essentially as its adviser and agent, does not change
18 that fact.

19 Similarly, the Department recognises that a focus on
20 the organisational niceties within Government may give
21 the appearance of shabby internal buck passing. It's
22 essential, of course, for the Inquiry to consider
23 carefully the organisational mechanics that allowed this
24 scandal to happen so that the right lessons can be
25 learned for the future. However, as the only Central

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1 but they were not the only causes, for the Horizon
2 scandal is also a story of false assurances; of
3 a culture of secrecy, of spin doctors; of untruths and
4 half-truths repeated as mantra to Board members,
5 officials, ministers, MPs and the Great British public,
6 of institutional and individual arrogance, incompetence,
7 dishonesty and cover-up; of misleading official advice;
8 of false testimony; of disclosure failures; of bad
9 lawyers.

10 Most of all, perhaps, it's a story which has its
11 origins in Post Office's corporate attitude of contempt
12 for the very people who were the face and the heart of
13 the institution.

14 The Department does not attempt to shirk its share
15 of responsibility for the mistakes which allowed this
16 scandal to happen. As the Post Office's sole
17 shareholder, the Department recognises that it is
18 ultimately accountable for the actions perpetrated by
19 the Post Office. The simple and inescapable truth is
20 that it failed to prevent this scandal from happening.
21 And the Department is responsible for the system of
22 oversight over the Post Office which was in place. For
23 reasons which have been thoroughly explored by the
24 Inquiry, and which I'll go on to address, that system
25 failed to provide adequate scrutiny and challenge in

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1 Government Department with Core Participant status in
2 this Inquiry, the Department wishes me to state clearly
3 and unequivocally that wherever within this
4 organisational structure the finger of blame may point,
5 be that the Post Office, ShEx, UKGI or the Department
6 itself, the Government accepts ultimate responsibility.

7 The Department has offered its sincere apologies for
8 its role in this dreadful scandal. Whilst its
9 recognition of these failures cannot change nor atone
10 for the devastation inflicted on postmasters and their
11 families, the Department hopes that its and the
12 Government's genuine commitment to learning the lessons
13 of this tragedy will go a long way to preventing its
14 recurrence in future.

15 The eight issues that I intend to address in this
16 closing statement are, in turn: procurement development
17 and rollout of the Horizon IT system; the organisational
18 structures for management, governance, oversight and
19 accountability; breaches of trust and the duty of
20 candour; the culture of the Post Office; ShEx and UKGI's
21 two-hatted role and the perception of conflict; the
22 broader legal and regulatory ecosystem; redress and
23 cultural transformation.

24 I turn first and relatively briefly to the birth of
25 Horizon, its procurement, development and rollout.

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1 As you'll remember, sir, several departmental and
2 other Central Government witnesses gave written and oral
3 evidence to the Inquiry during Phase 2 and the
4 Department provided a detailed written closing statement
5 at the end of that phase of the Inquiry.

6 From the Department's perspective, the main
7 headlines to emerge from that evidence were as follows:
8 first, during the 1990s it was almost universally
9 recognised and accepted that the development of
10 an integrated electronic point of sale and accounting
11 system was absolutely necessary to preserve the Post
12 Office Network and the livelihoods of postmasters. The
13 underlying aims and objectives of the Horizon project
14 were readily understandable and indeed laudable. But
15 there were serious problems from the outset in the way
16 in which the Horizon project was organised, in large
17 measures from failing to agree on specifications at
18 an early enough stage. The three-way contractual
19 relationship led to predictable difficulties with each
20 of the contracting parties, the Post Office, the
21 Benefits Agency and ICL Fujitsu, having different and
22 not easily reconcilable ambitions for the system.

23 As Sir Adrian Montague explained when giving
24 evidence to the Inquiry:

25 "The PFI contractual relationship was a poor fit for
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1 Byers described as a blank cheque going forward, and
2 they did not merely leave it to the Post Office to
3 ensure that its new IT system would work. It was for
4 this reason that they, ministers, insisted, despite Post
5 Office resistance, on a live trial in 300 post offices
6 before contractual acceptance. They also set up the
7 Horizon Working Group with the specific purpose of
8 hearing the voice from the frontline, a forum for
9 postmasters through the representative bodies and other
10 stakeholders to raise technical and practical problems
11 with Horizon directly with Government ministers.

12 These were sensible measures and could have had
13 a genuinely revelatory role, and it is surprising and
14 regrettable, to put it lightly, that the NFSP leadership
15 chose not to alert the Government to their members'
16 concerns about bugs and other technical problems in the
17 Working Group or elsewhere.

18 Its failure to do so defeated the whole purpose of
19 the Working Group and actively provided real and
20 material, but false, reassurance to the Government, and
21 the NFSP continued to act as a vocal defender of Horizon
22 over the years that followed.

23 When, in late 1999, the then Minister Alan Johnson
24 was informed of issues with Horizon's system ability,
25 accounting integrity and support, he immediately

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1 any IT procurement, especially one of this scale and
2 complexity, and really required much more detail and
3 specificity than was in the Horizon contract. And the
4 fact that the requirements for Horizon changed
5 materially during the development phase, the biggest
6 example being the cancellation of the Benefit Payments
7 Card functionality, was symptomatic and undermined the
8 smooth running and delivery of the project from early
9 on."

10 But none of this meant that Horizon was
11 irredeemable. As the expert reports commissioned by the
12 Government at the time made clear, the project remained,
13 to quote, "technically viable". Sir Adrian Montague
14 explained that this meant it was possible to develop the
15 system so it met the specification at the point it was
16 to be rolled out and, as Lord Mandelson stated in
17 evidence:

18 "The alternative to progressing with Horizon was
19 very unclear, technically and financially and it was
20 accepted that cancellation would have been a significant
21 setback to the modernisation of the Post Office."

22 So, armed with this knowledge, pressing on with the
23 project made sense at the time.

24 However, ministers realised the experts weren't
25 given what they'd described as -- or what's Stephen
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1 intervened and had rollout paused for an extended period
2 so that the issues could be resolved. It did not
3 recommence until he was given assurances that these
4 issues had been or were being resolved satisfactorily.

5 Sir Ian McCartney and David Sibbick both considered,
6 with the benefit of hindsight, that on an IT project of
7 this size and complexity, the Government should have
8 commissioned a further independent and expert review to
9 confirm that Horizon was indeed fit for purpose at the
10 point of rollout.

11 That may well be right and, clearly, in the
12 hindsight knowledge that Horizon was not fit for purpose
13 at the point of rollout, a further expert report or
14 reports may well have help expose and resolve problems
15 at that stage.

16 At the same time, of course, the line needs drawing
17 somewhere. The Inquiry will no doubt wish to evaluate
18 whether the information available to the Government at
19 the time should necessarily have led it to commission
20 such further reports with the attendant further delays
21 and uncertainty for postmasters. There was here
22 a balance.

23 The procurement development and rollout of Horizon
24 took place in the very early days of PFI Government IT
25 projects, and it's not the only Government IT project

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1 ever to have gone wrong. Whilst it's clear that many
2 lessons have been learnt along the way with many success
3 stories, the Passport Office being a good recent
4 example, IT procurement and development in Government
5 remain difficult and complex.

6 The history of the Post Office's project to replace
7 Horizon, despite the shortened arm and more intensive
8 Government scrutiny of the Post Office over these past
9 few years, is a good illustration of things going wrong,
10 though, of course, that's a project managed by Post
11 Office and not Central Government directly.

12 For now, the point is that the Government realises
13 that it needs to look hard at where things have gone
14 wrong in some of its major IT projects, including
15 Horizon, and to think creatively as part of a nonstop
16 effort to improve.

17 Pat McFadden, Chancellor of the Duchy of Lancaster,
18 commented in his UCL speech last week about the benefits
19 of the small scale, nimble and enterprising test and
20 learn approach favoured by successful private tech.
21 That may of one possible solution. The Government would
22 welcome other ideas.

23 I turn next to the organisational structure, in
24 other words the formal systems of Post Office
25 management, governance, oversight and lines of
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1 witnesses that the arm's-length model remains the only
2 sensible option for the Post Office, for so long as it
3 remains in public ownership. The Department agrees.

4 The arms-length legislative arrangement implied
5 a presumptive starting point that ministers should not
6 get involved in operational matters. The Department's
7 view is that, as a starting point, that was good and
8 sensible and indeed necessary. But ShEx/UKGI officials
9 were wrong to treat this as inflexible dogma. It was
10 always open to ministers to scrutinise and challenge the
11 way the Post Office was conducting its operations and to
12 use the levers that were available to them, if they were
13 unhappy with what they saw.

14 The general trust of the evidence is that ministers
15 understood this and did get engaged whenever they
16 thought it appropriate, based on the information
17 available to them. As I'll go on to explore, the
18 operative problem was not some arid concept of strict
19 strategic operational divide: it was that the ministers
20 were not given the information they needed, and so did
21 not realise there was a problem that required their
22 attention. In fact, they were consistently managed,
23 misled and deceived.

24 Ministers sat towards the top of a pyramidal
25 structure of management, governance, oversight and
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1 accountability, including in relation to the management
2 of risks. As Mr Sheldon said yesterday, the importance
3 of this issue is difficult to overstate, though we
4 realise not altogether exciting.

5 The Department set out in some detail its
6 observations on the structure that was in place during
7 this scandal, and I don't intend to rehearse those
8 observations in very great detail now. I can summarise
9 it as follows, starting with the arm's-length
10 arrangement. For over half a century, the Post Office
11 has existed at arm's length from Government. With the
12 passage of the Postal Services Act 2000, Parliament
13 decided to maintain and indeed strengthen through
14 legislation the Post Office's operational independence
15 free of Government interference.

16 The autonomy and independence given to the Post
17 Office was and remains a specific Parliamentary
18 objective, for which the practical and principled
19 reasons are readily apparent: first, that ministers have
20 neither the time nor, generally, the expertise to get
21 involved in running large and complex commercial
22 organisations such as the Post Office; and, second, to
23 enable the Post Office to operate as a commercial
24 business free of incessant Government interference.

25 There was almost universal consensus amongst
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1 accountable, typical of and necessary in any large and
2 complex organisation.

3 At the bottom of that pyramid were central Post
4 Office employees, for example, members of its Branch
5 Support, Communications, IT and Security Investigation
6 Teams.

7 They reported to and were managed through a number
8 of increasingly senior management tiers, up to,
9 ultimately, the Post Office Executive Team, led by the
10 CEO; the Executive Team were overseen by the Post Office
11 Board of Directors; the Post Office Board of Directors
12 was, until 2012, overseen by the Royal Mail Board of
13 Directors; the Post Office and/or Royal Mail Board of
14 Directors was overseen by the Shareholder Team at the
15 Government's Corporate Governance Centre of
16 Excellence -- first ShEx and, thereafter, UKGI; ShEx
17 UKGI reported, in relation to the Post Office, to the
18 junior minister and *in extremis* to the Secretary of
19 State; and ministers and the Secretary of State were
20 scrutinised by and accountable to Parliament and,
21 through Parliament, the British public.

22 This was not a system that lacked tiers of oversight
23 and, in common with the witnesses who spoke about this
24 structure, the Department believes that these
25 arrangements were broadly appropriate with one caveat
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1 that I'll come on to later. But there are two really
2 critical points here. First, the Post Office Board of
3 Directors was and remains the body with principal and
4 direct responsibility for overseeing the activities of
5 the Post Office. This was the clear and consistent view
6 of the Inquiry's own experts and of the senior UKGI
7 witnesses.

8 Each additional tier of oversight, in turn
9 ShEx/UKGI, ministers and Parliament, has an increasingly
10 high-level role inherent in the increasingly wide range
11 of responsibilities falling within their domain, and
12 their job is not to redo, review or second-guess all of
13 the work of each of the tiers below them.

14 As for the ministers, the evidence indicates that
15 they are busy to an extent and with such a range of
16 issues that is almost impossible for most of us to
17 imagine. Their role was essentially to satisfy
18 themselves that an appropriate structure was in place
19 beneath them, and then to decide, based on the
20 information available to them, where to focus their own
21 time on the issues arising across their portfolio.

22 Second, any organisation depends on honest and
23 truthful flows of information, up through the lines of
24 management and oversight and, as part of that, it
25 requires honest and truthful information in response to

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1 with ShEx/UKGI in its devolved role as corporate
2 governance experts and shareholder representative.

3 This reservation arises with hindsight. Several
4 witnesses have observed how simply putting in place more
5 tiers of oversight is not a panacea and, indeed, may in
6 many cases, act as a hindrance to good governance.

7 Dame Sandra Dawson emphasised more than once the
8 downsides to multiple governance and oversight tiers and
9 the importance of the unitary Board of Directors taking
10 proper ownership and accountability for the company.

11 Sir Martin Donnelly explained that: "When you have
12 the level of complexity that we're dealing with, you
13 have to be able to empower people to take decisions and
14 follow them through in a structure because, otherwise,
15 you're not going to get effective outcomes, and that the
16 challenge of adding additional layers as if you do not
17 have additional information on which to base your
18 challenge, it can merely add bureaucracy and actually
19 make it more difficult to get at the truth."

20 But it's also clear, in retrospect, that additional
21 oversight of the Post Office from a departmental Policy
22 Team may have led to greater or more astute scrutiny and
23 challenge of the Post Office and uncovered some of the
24 problems where ShEx/UKGI did not.

25 The creation in 2018 of the Policy Team within the

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1 scrutiny and challenge from the tiers above.

2 Sir Ed Davey expressed the point as follows:

3 "Our system of Government is essentially built on
4 the assumption that people in positions of trust, such
5 as the leadership of the Post Office, tell the truth."

6 The right to expect timely and accurate information
7 should be self-evident and was emphasised time and again
8 by the various witnesses, including senior UKGI
9 officials, permanent secretaries, ministers and
10 Secretaries of State, and the Inquiry's governance
11 experts.

12 Governance and oversight structures can only do so
13 much. As Dame Sandra Dawson put the point:

14 "A framework cannot control the behaviour. It sets
15 the boundaries and sets the expectations."

16 Sir Alex Chisholm made the same point more directly:

17 "No structural solution [he said] can fully deal
18 with the realities of the situation which depend on the
19 quality of the people you have in there and their
20 dealings with each other."

21 I said before that there was a caveat to the
22 Department's view that the overall governance and
23 oversight system was the right one. Its reservation
24 relates to the absence at the relevant times of
25 an internal departmental Policy Unit working in parallel

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1 core department has been a positive development,
2 providing, as it does, a cadre of dedicated civil
3 servants who work alongside UKGI to provide additional
4 scrutiny and challenge to the Post Office.

5 It is common ground, then, that this system
6 necessarily depended on individuals acting in good
7 faith, providing honest and truthful information up the
8 chain. The evidence heard by the Inquiry indicates that
9 the Post Office and several of its senior people were,
10 at best, recklessly indifferent to the truth and, at
11 worst, culpably dishonest.

12 Time and again, the Post Office provided materially
13 false, misleading, or incomplete information to
14 Government ministers, to Parliament, to the criminal
15 courts and to the British public at large and,
16 frequently, especially before mid-2018, the officials
17 from ShEx/UKGI whose job it was to scrutinise and
18 challenge the Post Office at the tier above the Board,
19 identify and surface risks and provide impartial,
20 objective and well-researched information and advice to
21 ministers, appear to have done not much more than repeat
22 what the Post Office told them.

23 The evidence is well known to the Inquiry, so
24 I refer briefly to just a small handful of the many,
25 many examples where ministers were provided with

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1 misleading or untruthful information.

2 You'll remember Sir Ed Davey receiving a briefing
3 from ShEx officials based on information provided by the
4 Post Office to ShEx, which assured him that Horizon had
5 proved robust, that there were no systemic integrity
6 issues, that the unions had expressed confidence in
7 Horizon, that there was proper training, that there were
8 proper audit processes and no back doors, that there'd
9 been regular reviews, there was an appeals process and
10 legal representation, and that no court had ever found
11 problems with Horizon. Much of that was, of course,
12 untrue.

13 Following Sir Ed Davey's meeting with Sir Alan
14 Bates, he, Sir Ed, asked ShEx officials for further
15 information on each of the issues Sir Alan raised. In
16 response the Post Office gave ShEx definitive but false
17 assurances, including that Horizon is fully robust, that
18 its integrity and sound basis have been demonstrated
19 over many years and that the JFSA's allegations were
20 unsubstantiated.

21 Each of those assurances would appear to bear the
22 hallmarks, we suggest, of the Post Office's
23 Communications Team. ShEx passed these assurances on to
24 the Minister and drafted a letter for him along the same
25 lines. These assurances included untrue statements that

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1 the inner workings of Government. Jo Swinson was at
2 times memorably apoplectic when, during her evidence,
3 she was shown documents that she'd never seen or been
4 given access to during her time as Minister.

5 Sir Ed Davey and Margot James were more restrained
6 but nevertheless clear, in their view, that they were
7 not given the sort of accurate, reasonably complete and
8 balanced information that they were entitled to expect.

9 While other ministers questioned and sought further
10 information and assurances, Baroness Neville-Rolfe was
11 in the minority in having had doubts at the time about
12 what she was being told. She said: "By this time
13 [August 2015], I'd lost confidence in the quality of
14 ShEx's advice. We were going round in circles and they
15 were unwilling to engage with the issues in the way
16 I felt they needed to. In my view, ShEx had lost
17 objectivity and its officials were unable or unwilling
18 to scrutinise POL properly, even though that was
19 an essential part of their role. The advice they gave
20 seemed close minded, deaf to the issues and constantly
21 repeating the same mantra. As time went by, I felt as
22 though they were trying to obstruct or shut down my
23 efforts to get to grips with the issues."

24 Ministers understand that one of their roles is to
25 scrutinise and challenge but the evidence demonstrates

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1 there was no remote access and proper independent audit
2 logs.

3 Paula Vennells gave Jo Swinson the explicit
4 assurance, in writing and to her face, that the Post
5 Office was compliant with its post-conviction duty of
6 disclosure and that there was no reason to conclude any
7 prosecutions were unsafe. There was no mention of the
8 Clarke Advice. The assurance was false.

9 Baroness Neville-Rolfe was given a misleading
10 summary of Second Sight's conclusions and, by Tim
11 Parker, a misleading summary of the progress of the
12 review he had commissioned at her instigation, and
13 a misleading summary of Jonathan Swift KC's most damning
14 findings. Nor did Tim Parker ever inform her or her
15 ministerial successors, that the continuing work he'd
16 promised as part of his review had been shelved.

17 More generally, ministers were never told about such
18 crucial pieces of information as contained in, for
19 example, Jason Coyne's expert report in the Julie
20 Wolstenholme prosecution, the Helen Rose Report, or the
21 Clarke Advice, to name just a few examples.

22 Ministers of different political stripes were
23 vocally critical of some of the information and advice
24 provided to them by officials and ShEx/UKGI. Their
25 evidence provided an unvarnished and candid insight into

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1 it's totally unrealistic to think that they can
2 challenge more than a small fraction of the information
3 and advice provided to them on a daily basis.

4 Ministers' offices received vast quantities of
5 correspondence from other MPs, constituents and
6 stakeholders raising a wide variety of issues, concerns,
7 complaints and requests for action, much of which would
8 never be put before the minister themselves. The
9 trickle of correspondence in relation to Horizon was
10 a tiny proportion of the total.

11 So ministers are necessarily, to a very large
12 extent, reliant on officials to highlight the
13 correspondence and other information they need to focus
14 on, and the inevitable result of the consistently
15 misleading information, partial advice and false
16 assurances given to ministers by the Post Office, via
17 ShEx/UKGI, essentially being told, "Nothing to see
18 here", was that these busy ministers, by and large,
19 focused on the issues in other areas of their portfolio
20 which were seemingly in greater need of their attention.

21 All the ministers explained how their usual
22 experience was that civil servants acted with
23 appropriate objectivity. But the Department agrees with
24 UKGI that there were certainly occasions on which
25 ShEx/UKGI advice to ministers was insufficiently

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1 objective.

2 This is not the only public inquiry to reveal
3 evidence of officials falling short of the expectation
4 that they act in accordance with the Nolan Principles.
5 We refer in our written closing statement to the
6 Infected Blood Inquiry and the Magnox Inquiry, and there
7 are other examples, perhaps, most obviously,
8 Hillsborough.

9 It's also obvious that the Department's clear
10 expectation that the Post Office would ensure that its
11 staff too acted with candour and consistently with the
12 Nolan Principles was misplaced. The Government realises
13 it needs to look again at how appropriately high
14 standards of conduct are observed at its public
15 corporations and other arm's-length bodies.

16 It will be for the Inquiry to identify the reasons
17 why accurate and objective information was in such short
18 supply. I will, in due course, offer some suggestions
19 as to some of the causes, and the Department would
20 welcome suggestions that the Inquiry has for
21 improvements in the future.

22 As you know, sir, the Government has committed to
23 putting forward legislation to introduce a new statutory
24 duty of candour, backed up by criminal sanctions. That
25 was one of the recommendations of Sir Brian Langstaff's

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1 symptoms of groupthink and draw attention to the
2 findings and recommendations of other recent public
3 inquiries in this respect.

4 It is regrettable, to say the least, that ministers
5 were never informed of these profound cultural problems.
6 Likewise, Jo Swinson was understandably aggrieved that
7 the Post Office Board's and ShEx officials' shared
8 concerns over Paula Vennells' aptitude and performance
9 as CEO were never drawn to her or any other ministers'
10 attention.

11 I'll return to the theme of culture and cultural
12 transformation in due course.

13 A second theme is the extent to which ShEx/UKGI
14 officials saw it as their role to scrutinise and
15 challenge the Post Office. Clearly, that was their role
16 on behalf of the Department but it seems this was not
17 always clearly understood and acted upon by all relevant
18 officials.

19 As a responsible and self-critical public body, UKGI
20 has clearly reflected on the reasons why that may have
21 been the case. The Department agrees with UKGI's
22 observations and adds any the following:

23 First, we strongly agree that the starting point is
24 that ShEx/UKGI officials were entitled to place
25 substantial reliance on the information and assurances

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1 Infected Blood Inquiry report, in turn, a development of
2 one of the recommendations of Bishop James Jones' report
3 into the Hillsborough disaster. The Department
4 presently sees no reason in principle why this duty of
5 candour should not extend to public corporations like
6 the Post Office and, indeed, across Government.

7 So, what were the reasons why justifiable
8 expectations of candour were frustrated in the course of
9 this scandal? The starting point -- as Alisdair Cameron
10 put it, "the original sin" -- was, we suggest, the Post
11 Office's institutional culture. It was a culture which
12 seemingly tolerated indifference to the truth and
13 a culture, embodied in its Postmaster Contracts which
14 looked down on, mistrusted and exploited postmasters.

15 The Inquiry will form its own view of the Executive
16 and Board level culture in the Post Office at relevant
17 times. The evidence may suggest that it was, at least
18 some stages, weak, arrogant, unintelligent, defensive,
19 incurious and close minded, with far too much emphasis
20 on internal consensus, too little space for internal
21 challenge and firm resistance to any external scrutiny.

22 We suggest in our written closing statement that
23 this was an institution which was, at Board and
24 Executive level, badly infected by groupthink. In our
25 written closing statement, we discuss the causes and

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1 provided to it by the Post Office.

2 As Sir Stephen Lovegrove observed:

3 "It's not ShEx/UKGI's role to challenge everything
4 they are told."

5 At the same time, clearly there was a need for
6 ShEx/UKGI officials to review the available information
7 and ensure that the advice and information they provided
8 to ministers was clear as to its sources. As Baroness
9 Neville-Rolfe stated:

10 "If I had been my previous self as civil servant
11 sitting in that seat, I would have gone away and I would
12 have read the whole of the Second Sight Report and
13 I would have gone through all of the negative findings,
14 understanding what was right and what it was wrong.
15 That wasn't done. What they did was take advice from
16 the Post Office because they felt the Post Office could
17 give the answers, and that isn't what you do. As a good
18 civil servant, you bring -- you look at different -- you
19 know, you look at different sources."

20 Second, the evidence indicates that the two-hatted
21 role as a NED on the one hand and as a shareholder
22 representative on the other, may have led some ShEx/UKGI
23 officials to perceive that there was a conflict as
24 between their duties to the shareholder and their duties
25 as a Companies Act director. It appears that this may

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1 have led to confusion as to the importance of
2 independent scrutiny and challenge, and the importance
3 of providing independent, objective, and impartial
4 advice and information to ministers.

5 The Department notes that the IOD -- the Institute
6 of Directors -- in its recent report, concluded that at
7 times, the two-hatted role may have led to confusion,
8 and suggested that the parameters of the Shareholder NED
9 role should be reconsidered.

10 Third, the Inquiry heard evidence which may suggest
11 that the confusion which flowed from this two-hatted
12 role, if indeed it did flow from the two-hatted role,
13 led the Shareholder NED at times to increase
14 susceptibility to the Post Office's own groupthink and
15 acceptance of the Post Office's internal norms. For
16 example, Jo Swinson suggested that Richard Callard had
17 gone native and Baroness Neville-Rolfe suggested that
18 the Shareholder Team led by Mr Callard had lost
19 objectivity.

20 Fourth, many ShEx/UKGI staff do not or at least did
21 not have classic Civil Service backgrounds. Given its
22 highly-specialist work, that's perfectly understandable,
23 but the evidence may have tended to suggest, as is
24 hardly surprising, that may have meant the Nolan
25 Principles as expressed in the Civil Service Code were

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1 exist in a vacuum. They all formed part of a broader
2 legal, regulatory and indeed ethical ecosystem.

3 That ecosystem includes not only the Financial
4 Reporting Council Code and the Civil Service Code, but
5 also the Companies Act, employment and disciplinary law,
6 the criminal law and the criminal justice system and
7 professional regulation, including, as relevant, the
8 regulation of solicitors and barristers. In a healthy
9 society, it also includes ordinary codes of morally
10 acceptable behaviour.

11 That ecosystem serves to drive high standards of
12 behaviour and deter inappropriate behaviour. It
13 cumulatively failed in those objectives here with
14 catastrophic results. The question is: why? One answer
15 may be that the jeopardy for improper behaviour,
16 breaches of professional codes, breaches of criminal
17 law, was insufficiently serious. As I've mentioned, the
18 Government has committed to give sharper teeth to the
19 Nolan Principles through the new statutory duty of
20 candour backed up by criminal sanctions.

21 As the Department described in its written closing
22 statement, the role played by lawyers in this scandal
23 was particularly deplorable. The regularity and
24 seriousness of disclosure failings is astonishing.
25 Ministers quite justifiably placed real weight on the

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1 not always so deeply ingrained. This was a point made
2 by Baroness Neville-Rolfe.

3 In addition, the early Shareholder NEDs indicated
4 that they were given almost no training in this
5 inherently difficult role. The Department therefore
6 warmly welcomes the improvements that UKGI has made to
7 its operations in the wake of this scandal, including
8 but certainly not limited to, improved recruitment and
9 training and embedding with greater force the importance
10 of the Civil Service Code.

11 The Department is clear in its view that a Centre of
12 Excellence for corporate governance within Government
13 remains essential.

14 The Department also recognises that, had the
15 Department had its own Post Office Policy Team at the
16 relevant times this would have provided an additional
17 mechanism to scrutinise and challenge the Post Office
18 and thereby reduce the Government ministers' reliance on
19 ShEx/UKGI.

20 In our written closing submissions, we make the
21 point that the management, governance and oversight
22 structures that were in place did not exist in a vacuum.
23 In the same way, the justified expectation of, and
24 entitlement to, honest and truthful information and
25 advice in accordance with the Nolan Principles did not

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1 assurances that the Post Office had always complied with
2 its duties of disclosure to the criminal courts.

3 And the evidence of the role played by lawyers in
4 misusing and abusing the important principle of legal
5 professional privilege to evade external scrutiny was
6 eye opening. But the Inquiry has also seen evidence
7 which may suggest that the Post Office leadership set
8 a culture which was critical of lawyers who deigned to
9 place their professional integrity above the interests
10 of the business.

11 You'll recall Paula Vennells' extraordinary
12 September 2013 note. The Government has heard the
13 submissions made by the Huddells Core Participant group
14 concerning the regulation of lawyers and will welcome
15 any recommendations that the Inquiry has in that
16 respect.

17 I next turn to address relatively briefly the issue
18 of redress.

19 I start by restating the Department's position that
20 it has worked very hard and in good faith to ensure that
21 full, fair and prompt redress is paid to the Post
22 Office's victims. There's been no lack of effort. But
23 the Department realises that this has been too slow for
24 many postmasters and their families, and it is acutely
25 conscious that the list of those who have tragically

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1 passed away before receiving full and fair redress
2 continues to grow.

3 In its written closing statement, the Department has
4 set out its position on redress in some detail, and
5 I won't repeat that now. Instead, I'll use my time to
6 address some of the bigger themes that emerge from the
7 evidence in relation to redress.

8 The first is to pick up a point made by number of
9 witnesses and indeed by the National Audit Office in its
10 Government Compensation Schemes Lesson Learnt Report
11 published in July of this year, that is that there is
12 presently no centre of expertise within Government to
13 provide guidance, expertise, or a framework for public
14 bodies seeking to set up a compensation scheme. This
15 means that each new compensation scheme involves a newly
16 reinvented wheel or, once a compensation scheme has been
17 launched, rebuilding the plane whilst flying it, to
18 paraphrase Sarah Munby's evidence.

19 The second point, related to that first point, is
20 that it's easy in hindsight to criticise
21 an incrementalist approach to compensation scheme design
22 and delivery because, as Sarah Munby described:

23 "There's a tendency to assume that it was possible
24 to build a perfect scheme in the first place."

25 As Sarah Munby explained, the least bad option is
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1 Government as a whole has approached redress. It acted
2 to go behind the GLO settlement by creating the GLO
3 compensation scheme and, ultimately, secured primary
4 legislation to ensure the continuing power to pay.

5 It found creative solutions to speed up redress,
6 most obviously fixed-sum offers, which were a novel and
7 genuinely game-changing development and it promoted the
8 controversial and ground speaking legislation, resulting
9 in the mass exoneration of mass postmasters convicted of
10 Horizon offences.

11 These were not small things and they were not
12 well-worn solutions.

13 As a mark of its seriousness, the Government has set
14 aside funding of £1.8 billion which the Treasury has
15 publicly confirmed is not a limit, and it has so far
16 paid out around £0.5 billion in financial redress.
17 These are big sums and the Department is proactively
18 looking to identify gaps in the existence schemes. The
19 Government is pleased that Fujitsu has recognised that
20 it must share the responsibility for meeting the costs
21 of the scandal. The Horizon Compensation Advisory
22 Board's paper on the future of redress goes further than
23 the National Audit Office's report. As well as
24 advocating an independent body to deliver redress, it
25 proposes that that body should have a role in monitoring
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1 often to get going and make changes later, rather than
2 attempting to design the perfect scheme to start with.
3 There's an element here of the test-and-learn approach
4 suggested by Pat McFadden. Of course, so much the
5 better if the initial design, even if imperfect, were to
6 benefit from expert input of the type proposed by the
7 NAO.

8 Third, the Department has regularly, proactively and
9 constructively engaged with the postmasters'
10 representatives and has regularly made improvements to
11 the schemes in line with their suggestions. It's set up
12 the Horizon Compensation Advisory Board, which has
13 played a hugely important roll. It involved the
14 representatives of the postmasters in the design of the
15 Group Litigation Order Scheme and the Horizon
16 Convictions Redress Scheme from the outset, and it will
17 continue with this process of engagement and incremental
18 improvement in furtherance of those aims, full fair and
19 prompt, out of the glare of this Inquiry.

20 Fourth, whilst Sarah Munby and Kemi Badenoch
21 suggested a lack of creativity in the Government's
22 response, and we note the Hudgell Core Participant Group
23 refer to a business as usual approach in their written
24 closing statement, there has, in fact, at times been
25 genuine innovation in the way the Department and the
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1 the behaviour of Government organisations through
2 looking at both unresolved complaints and management
3 information.

4 The Government would welcome the Inquiry's view on
5 this point.

6 The Department recognises that there is still much
7 work to be done. It realises that every day that
8 postmasters and their families continue to wait for full
9 and fair financial redress is a day too long. It will
10 continue to work hard to make improvements to the
11 schemes, in the interests of ensuring full and fair
12 compensation is paid as quickly as possible.

13 It publishes regular progress reports, it's subject
14 to ongoing Select Committee and other Parliamentary
15 scrutiny. For example, the Minister has just today made
16 a further statement to Parliament, a written ministerial
17 statement.

18 The Department would, of course, be happy to provide
19 further updates to the Inquiry for as long as you would
20 find that helpful, sir, and it will welcome the
21 Inquiry's recommendations on how to improve the system
22 by which Government provides redress and compensation
23 for the future.

24 Finally, sir, I return to the critical matter of
25 culture and cultural transformation at the Post Office.
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1 The evidence heard by the Inquiry has indicated that the
2 profound cultural problems at the Post Office have
3 existed over decades. The Department has recognised the
4 need for a complete reset of the Post Office's culture
5 and a rebalancing of its corporate mission.

6 Together with UKGI and the Post Office Board, the
7 Department has taken real and material steps to improve
8 the culture: an example is the innovation of Postmaster
9 NEDs. But cultural transformation of a large and
10 complex organisation like the Post Office, with such
11 deep rooted problems, takes time. Whilst the Department
12 has seen signs that the culture is genuinely improving,
13 serious problems have remained.

14 Without attempting to provide an exhaustive list,
15 this is clear from the YouGov evidence, the evidence of
16 Saf Ismail and Elliot Jacobs, the evidence about the
17 untouchables, the executive bonus metrics, the history
18 of the Horizon replacement project, and the
19 circumstances leading to and following the dismissal of
20 Henry Staunton.

21 Clearly, the Post Office has remained an institution
22 under real stress. Changing the culture of a large and
23 complex organisation like the Post Office is not easy
24 and there have been and will be choppy waters to be
25 navigated but there are reasons to be optimistic.

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1 making Board appointments.

2 As the Minister Gareth Thomas and the Secretary of
3 State Jonathan Reynolds explained in their evidence to
4 the Inquiry, the Government wishes to facilitate
5 a wide-ranging conversation about the future of the Post
6 Office and its culture, which includes the perspectives
7 of the public at large.

8 It recognises that profound questions about the
9 future model of the Post Office should not be kicked
10 down the road any further. That is why the Department
11 has committed to publishing a Green Paper in the first
12 half of next year, which will seek views on a range of
13 different proposals for a future Post Office Network.

14 The Department urges all those with an interest in
15 a future in which the Post Office and its postmasters
16 can flourish to respond to that consultation.

17 In sum, the Government does not accept that the Post
18 Office is not worth saving. To the contrary, it is
19 essential that the Post Office is able, once again, to
20 take its proper role as a trusted and trustworthy
21 institution at the centre of our national life.

22 Sir, the Department remains committed to learning
23 from the Horizon scandal in the interests of preventing
24 anything similar happening in the future. It will
25 continue to reflect on the evidence that has been heard

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1 The Department has faith that, under Nigel Railton's
2 leadership as Chair, the Post Office is heading in the
3 right direction and the Department endorses and supports
4 his efforts towards a renewed and rebalanced Post
5 Office. He has set a new tone at the top of the
6 organisation, giving a clear vision of a future Post
7 Office with postmasters at its centre. He has also
8 started implementing the recommendations of the Grant
9 Thornton report, in relation to Board effectiveness.
10 The Inquiry has heard evidence that there has been
11 a noticeable improvement in the working relationships at
12 Board level, more streamlined governance arrangements
13 and much better communication with Government and the
14 Government hopes and expects that the new statutory duty
15 of candour will help to drive improved standards across
16 the Post Office. Mr Railton needs time, and he needs
17 the support of the Department.

18 New appointments to the Board will be crucial. The
19 Department, with UKGI's assistance, is making progress
20 in appointing NEDs with experience in organisational
21 design, public sector ownership, and major IT projects.
22 We note the IOD's recommendations in its recent policy
23 paper and recognise that in relation both to the Post
24 Office and to public corporations in general, the
25 Government needs to act with real intelligence when

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1 throughout this Inquiry and it will look forward to
2 receiving the Inquiry's recommendations in due course.

3 **SIR WYN WILLIAMS:** Thank you, Mr Chapman.

4 **Closing remarks by THE CHAIR**

5 **SIR WYN WILLIAMS:** At this point, in the area of South Wales
6 from which I come and in which I live, I'd say, "Well,
7 there we are". Except it's not quite "there we are"
8 because there's a rather important next step. Before
9 I get to the next step, can I pay my tribute to all
10 those who have participated in, written and articulated,
11 the closing submissions that I have received. It goes
12 without saying that I have already found them extremely
13 helpful and I will continue to do so. I am grateful to
14 you all.

15 I would also like to thank again all the persons who
16 have attended this Inquiry and shown such interest in
17 it. I would particularly like to thank those people who
18 attend in person, as opposed to remotely, for their good
19 humour, discipline and ability to sit through evidence
20 and submissions, which no doubt some of them found
21 extremely difficult to hear and take in. So thank you
22 all for your very disciplined and good behaviour.

23 I thank my team often enough that it becomes almost
24 part of every day in my life but I have had great
25 assistance from a great team.

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1 So what remains is the question on all your lips:
2 but when will he report? I can hardly say I don't
3 remember but I will say, genuinely, I do not know, and
4 so I make no promises other than I will report as
5 quickly as I sensibly can once I am satisfied, and I'll
6 need to be satisfied, of all my crucial conclusions.

7 That is, without doubt, many months away but I hope
8 it's not much longer than that, and that's all you're
9 getting from me by way of a prediction.

10 So thank you all again and now we will depart.

11 **(3.18 pm)**

12 **(The hearing concluded)**

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