

Wednesday, 10 April 2024

(10.00 am)

MR BEER: Good morning, sir, can you see and hear us?

SIR WYN WILLIAMS: I can see you but I can't hear you at the moment, Mr Beer.

MR BEER: I'll try again. Can you now hear me?

SIR WYN WILLIAMS: Yes, now I can.

MR BEER: Thank you very much, I can now see and hear you. Can I call Lord James Arbuthnot, please.

LORD JAMES NORWICH ARBUTHNOT OF EDROM (sworn)

Questioned by MR BEER

MR BEER: Lord Arbuthnot, I am Counsel to the Inquiry. My name is Jason Beer, as you know. Can you give us your full name, please?

A. James Norwich Arbuthnot of Edrom.

Q. Thank you for providing the Inquiry with a very detailed witness statement and for giving evidence today to assist us in our investigation. In relation to the witness statement you've provided, can we look at it, please. It's the only time I'll ask you to look at a hard copy document. The URN is WITN00020100. The witness statement is 180 pages in length, excluding its exhibits, and dated 12 March 2024. Can you turn to page 180, please.

A. Yes.

1

Q. -- and ask for your further recollection about them.

A. Yes.

Q. Can we start, please, with a little about your background. Would you agree with this summary: you were formerly a barrister practising in Chancery matters?

A. Yes.

Q. You were a Member of Parliament between 1987 and March 2015?

A. Yes.

Q. In that period, you were a backbench MP?

A. Yes.

Q. You held senior positions in government, including in Trade and Industry, in Work and Pensions and in Defence?

A. Yes.

Q. You held senior positions as an opposition MP, including as Assistant Chief Whip, Shadow Secretary for Trade and Industry and Chair of the Defence Select Committee?

A. I was actually a full Chief Whip.

Q. I'm so sorry. In October 2015, you were made a Life Peer?

A. Yes.

Q. You have been extensively involved in, and played a significant role in, the investigation of the Horizon system, the use of data from that system to prosecute and bring civil proceedings against subpostmasters and

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Q. Is that your signature?

A. It is.

Q. Are the contents of that witness statement true to the best of your knowledge and belief?

A. They are.

Q. As I've said, your witness statement is exceptionally detailed. You've kindly devoted what's obviously been a substantial period of time to the making of it and you set out relevant events in chronological order, adding in your recollections, where you have remaining recollections, and providing us with documents in your possession.

A. Yes.

Q. That witness statement will be uploaded to the Inquiry website today so it's available for public view. I'm accordingly not going to ask you about every matter within it.

A. Good.

Q. It stands as your evidence and is being made available, as I say. Instead, I'm going to take you to some more significant events that have occurred over the last 15 years or so, ie since your first involvement with the Horizon system and the Post Office's running of it, which was in April 2009, I believe --

A. Yes.

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Crown Office employees, the conduct and behaviour of Post Office employees, senior executive and board members, the conduct of government, the operation of the legal system and of the courts and the process of seeking redress and accountability; is that a fair summary?

A. Yes.

Q. That all began, I think, with a coffee morning in your constituency on 3 April 2009; is that right?

A. Yes.

Q. Then, I think, you learned about the case of Jo Hamilton?

A. I did.

Q. Your involvement continues, I think, to this day, not least because you're a member of the Horizon Compensation Advisory Board?

A. That's right.

Q. As I've said, your first involvement came about, I think, by reason of being told about Jo Hamilton's case.

A. Yes, it did.

Q. I think you also learned about an article that was being written, it hadn't yet been published, but it was being written by Rebecca Thomson of Computer Weekly; is that right?

4

1 A. Yes.

2 Q. I think you tell us that you already held that

3 publication in high regard because of some previous

4 involvement in some work it had done?

5 A. Yes, the Chinook crash on the Mull of Kintyre.

6 Q. Then later in 2009 you learned about a second case, that

7 of David Bristow, the former subpostmaster in Odiham; is

8 that right?

9 A. That's right.

10 Q. His contract was terminated by the Post Office by reason

11 of an alleged shortfall of £42,000, he suggested that

12 the Horizon system was responsible for the shortfall; is

13 that a fair summary?

14 A. Yes.

15 Q. Now, as well as lots of liaison with those who had drawn

16 your attention to those two cases, Jo Hamilton's and

17 Mr Bristow's, and liaison over permission to use the

18 information that you had been given -- I've seen all of

19 the correspondence where you sought such permission --

20 would it be right that the first significant step that

21 you took was to write to Lord Peter Mandelson, who was

22 when the Secretary of State for Business, Innovation and

23 Skills?

24 A. Yes, that's correct.

25 Q. Can we look at that first significant step, then. The

5

1 A. Yes, I was.

2 Q. -- writing to the then Secretary of State, drawing his

3 attention directly to the suggestion that Horizon was

4 responsible for shortfalls which were being laid at the

5 door of subpostmasters by accusations against them of

6 fraud?

7 A. Yes.

8 Q. Why were you writing, may I ask, to the Government

9 rather than to the Post Office, who ran this Horizon

10 system?

11 A. Because the Government owned the Post Office.

12 Q. I think you followed this up with a chaser, if we look

13 at page 3 of the pack, here, same clip. If we can just

14 expand that a little bit. So we're now on 10 December

15 2009, you write to Lord Mandelson again, saying:

16 "I write further to my letter of 3 November

17 regarding correspondence received from [David Bristow].

18 "I enclose a copy of my previous letter, and the two

19 emails to which it refers. I also enclose two

20 subsequent emails from Mr Bristow and an email from

21 a local counsellor, John Kennett, describing the

22 circumstances of the second Post Office in my

23 constituency affected by the Horizon system, Jo Hamilton

24 of the South Warnborough post office, Hampshire.

25 "I have not yet received a reply and should be most

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1 document will come up on the screen, it's POL00114298.

2 It's page 9. If we can just enlarge so we can see the

3 text. Thank you. You write on 3 November 2009 to

4 Lord Peter Mandelson, the Secretary of State for

5 Business, Innovation and Skills, sometimes known as BIS.

6 You say that you enclose two emails that you've received

7 from a constituent, Mr David Bristow, and you give his

8 address. I'm not going to show you those emails for the

9 moment, it's not necessary. You note a PQ raised by

10 Brooks Newmark MP on 12 October and the reply of

11 13 October 2009 from Alan Cook, the MD of the Post

12 Office.

13 Then you say this:

14 "Nonetheless there does appear to be a significant

15 number of postmasters and postmistresses accused of

16 fraud who claim that the Horizon system is responsible,

17 including at least two in my constituency.

18 "Given the level of impact this has had on the

19 personal lives of these postmasters and postmistresses

20 and their families, often involving bankruptcy and

21 certainly significant financial hardship, I should be

22 most grateful if you would let me have your comments on

23 what can be done to investigate the matter."

24 So this is, to put this in context, you as

25 an opposition MP at this time --

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1 grateful if you would let me have your comments on the

2 matter. I also request reassurance that BIS [that's

3 Business, Innovation and Skills, the department] will

4 investigate this matter fully and take action as and

5 where appropriate. Given the urgency of Mr Bristow's

6 situation I would ask for your attention as soon as

7 possible and a response by way of a letter or, if

8 preferred, a meeting."

9 You were asking here that the Department for

10 Business, Innovation and Skills should investigate the

11 matter. Again, may I ask, why were you asking the

12 Department to look into the matter rather than asking

13 the Secretary of State to ask the Post Office to look

14 into the Post Office?

15 A. I was not hugely interested in the intricacies of who

16 was responsible for what. I just wanted it sorted out,

17 and I thought I might as well write to the person who

18 owned it, who was Peter Mandelson.

19 Q. Now, in the meantime, it seems that a letter had been

20 drafted and perhaps even sent by way of reply to your

21 first letter. If we can look at that, please.

22 UKGI00011506. You'll see that this is dated 5 December

23 2009 and, presumably, this hadn't been received by you,

24 by the time you had sent your letter of 10 December?

25 A. Presumably, yeah.

8

1 **Q.** You will see, if we scroll to the bottom, please, it's
 2 sent by the Minister, Pat McFadden, rather than the
 3 Secretary of State, Lord Mandelson. If we go to the
 4 body of the letter, please, he thanks you for the letter
 5 of 3 November and says he's replying as the Minister of
 6 State for Business, Innovation and Skills, and he says:
 7 "Under the Government's postal sector reforms
 8 introduced in 2001, Royal Mail (which includes Post
 9 Office Limited) was given greater commercial freedom, as
 10 the management and unions had requested, and Government
 11 has assumed an arm's length role as a shareholder in
 12 a public limited company. Subject to agreeing its
 13 strategic plan with us, the Board can structure the
 14 business as it decides best to meet the challenges of
 15 market development and changing customer needs.
 16 "The issues raised by your constituent are
 17 operational and contractual matters for [the Post
 18 Office] and not for Government. I understand from [the
 19 Post Office] that errors at the branch have been fully
 20 investigated and there is nothing to indicate that there
 21 are any problems with the Horizon system. The company's
 22 position as regards the integrity of the Horizon system
 23 remains as set out in the reply from Alan Cook ... to
 24 which your letter refers."
 25 You'll see in the second paragraph there Mr McFadden

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1 **A.** What this arm's length arrangement essentially means is
 2 that the Government is refusing to take the
 3 responsibilities that go with ownership and I don't
 4 think it's right to do that for various reasons. One
 5 reason is that, if you have an organisation that is as
 6 important to the community as the Post Office is, then
 7 the people have got to be able to have proper control
 8 over it, if the people own it. And there's a sort of
 9 democratic deficit that is popping up here if the
 10 Government is refusing to take responsibility for it.
 11 And, also, I know that Mr Henry has been talking
 12 about the risks of owning a dangerous dog. You cannot
 13 say that the dangerous dog has an arm's length
 14 relationship with you if you -- if the dangerous dog
 15 behaves badly.
 16 So the whole process of arm's length control is
 17 a worrying one, it seems to me.
 18 **Q.** That can come down. Thank you. Much later on in the
 19 chronology, and this is paragraph 106 of your witness
 20 statement, you say that, after the publication of the
 21 Second Sight Interim Report of July 2013, the then
 22 minister, Jo Swinson, in the event decided to make
 23 a statement in which she again emphasised the arm's
 24 length nature of the relationship between the Post
 25 Office and its owner, the Government.

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1 took the point or took the line that the Government had
 2 assumed an arm's length role as the shareholder with the
 3 Post Office and, in the third paragraph, that the issues
 4 raised by you, which included that a large number of
 5 people may have been wrongly accused of crimes when, in
 6 fact, Horizon was to blame, was not a matter for the
 7 Government.
 8 **A.** Yes.
 9 **Q.** What was your reaction, if any, to those points?
 10 **A.** I was frustrated and annoyed but it was clear that the
 11 Government was saying that it was really nothing to do
 12 with them, and I didn't see at that stage where I could
 13 take it.
 14 **Q.** Why were you frustrated?
 15 **A.** Because I'd wanted what had seemed to me to be something
 16 that was potentially an injustice to be sorted out and,
 17 since the Government owned the Post Office, I assumed
 18 that the Government would be in a position to sort it
 19 out, but they were saying "No, not me, gov".
 20 **Q.** You tell us in your witness statement that,
 21 notwithstanding the frustration that you felt at the
 22 time, it didn't then occur to you quite how troubling
 23 the reply was?
 24 **A.** Yes.
 25 **Q.** Can you explain what you mean by that?

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1 I think you say that in your view that was
 2 essentially the same position being taken as we see in
 3 this letter here, in 2009?
 4 **A.** Yes. I don't know when this arm's length arrangement
 5 started but it was one that moved from the Labour
 6 Government to the coalition Government and carried on
 7 into the subsequent Conservative Government, yes.
 8 **Q.** Can we turn to 2011 and early 2012, please. I'm going
 9 to skip over some other events, in particular your
 10 meetings with Jo Hamilton and with David Bristow,
 11 a meeting and correspondence with Ed Davey in 2011, the
 12 BBC Inside Out piece, presented by Nick Wallis and your
 13 conversation with Alice Perkins at a conference at
 14 Ditchley Park, and, instead, may I pick up the
 15 narrative, please, with letters that you wrote to Moya
 16 Greene, the then Chief Executive of Royal Mail Group,
 17 and again to Ed Davey, the then Parliamentary
 18 Undersecretary of State for Business, Innovation and
 19 Skills.
 20 Can we start with the letter to Moya Greene and
 21 a reply that you got from Paula Vennells, then managing
 22 director of Post Office Limited.
 23 So let's start with your letter. POL00105483. This
 24 is you writing on 15 December 2011 to Moya Greene, the
 25 Chief Executive of Royal Mail Group Plc, and you say:

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1 "I have been contacted by a number of constituents
2 living in Odiham in Hampshire who are most upset by the
3 fact their local post office has been closed, and that
4 a longstanding employee, Paul Kemp, has been dismissed
5 due to 'irregularities'."

6 Just stopping there, you're referring there,
7 I think, to a second subpostmaster, who had replaced
8 Mr Bristow, who had himself in turn been dismissed from
9 the Odiham branch.

10 **A.** Precisely. Mr Kemp did not himself approach me but my
11 constituents in Odiham did because they were worried
12 about losing the Post Office in Odiham.

13 **Q.** I think you tell us in your statement that this gave
14 rise to a number of concerns that, in particular, you
15 considered that it could not simply be a coincidence
16 that two subpostmasters in quick succession at the same
17 branch would be dismissed by the Post Office over
18 alleged shortfalls?

19 **A.** As well as the subpostmistress in the next-door village
20 of South Warnborough. Actually, there was something at
21 the back of my mind which continued to trouble me, which
22 was the number of these people who were being told "You
23 are the only person this is happening to", and that
24 struck me as being profoundly wrong because, at first,
25 it was obviously disprovable, they were not the only

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1 employees throughout the country who feel they have been
2 wrongly accused of fraud due to faults in this
3 particular system, and am meeting with them in the New
4 Year to discuss what action they plan on taking. You
5 may recall that this case was brought to my attention in
6 2008 [I think that should actually be 2009], when the
7 subpostmistress from South Warnborough [Jo Hamilton] in
8 Hampshire faced the same situation. It has not been
9 rectified, a situation which does not bring credit to
10 the Royal Mail.

11 "I am also writing to the Minister to make him aware
12 of this."

13 We will look at that in a moment. Then you deal
14 with a separate point about the closure of the branch in
15 Odiham.

16 Overall, in this letter, you were raising the
17 Horizon issue, not just in the context of the Odiham
18 Post Office but as a much broader point; would that be
19 fair?

20 **A.** Yes.

21 **Q.** Can we look at the reply, please, POL00107698.

22 "Thank you for your letter of 15 December addressed
23 to Moya Greene [that's the one we've just looked at].
24 As Managing Director of Post Office Limited, Moya has
25 asked me to reply to you direct."

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1 people it was happening to; second, it was isolating
2 those subpostmasters and postmistresses, so they could
3 not get support from others in the same position; and,
4 third, it had an element of intimidation about it; all
5 of which set the Post Office and its way of operating
6 with its subpostmasters in a bad light, and that was at
7 the back of my mind, even though I didn't put that in
8 this letter.

9 **Q.** I've skipped over your meetings with Mr Bristow and Jo
10 Hamilton. You tell us in your witness statement that at
11 a personal level, in the light of seeing them face to
12 face, which is what you had done, you formed a view of
13 them that they were transparently honest people with
14 integrity --

15 **A.** Yes, absolutely.

16 **Q.** -- and that, in your judgement, it was vanishingly
17 unlikely that they were the type of people who would
18 have done what was alleged against them?

19 **A.** Yes, completely.

20 **Q.** Carrying on, you say:

21 "I am most concerned on a number of fronts. First,
22 my constituents tell me that this case appears to be
23 a continuation of the problem that Post Office employees
24 have been having with the software system that
25 reconciled takings. I am aware of 34 individual

14

1 If we look at the foot of the page -- sorry, over
2 the page -- we can see it is a letter from Paula
3 Vennells.

4 **A.** Yes.

5 **Q.** Then back to page 1. So 9 January, Paula Vennells is
6 writing back to you.

7 The first page of this letter is about the last
8 paragraph of your letter about the opening and closing
9 of the branch in Odiham, so I'm going to skip over all
10 of that because it's about whether and in what
11 circumstances there should or should not be a Post
12 Office at Odiham. Then, over the page, Ms Vennells
13 addresses the wider issue that you raised:

14 "Turning to your more general comments about the
15 Horizon system, we handle large sums of public money as
16 well as the money entrusted to us by the 20 million
17 people who visit our 11,500 branches each week. There
18 are a small number of previous and existing
19 subpostmasters, including Mrs Hamilton who used to run
20 the South Warnborough post office, who allege that
21 financial discrepancies at their branch are due to a
22 fault with the system. We are also aware of the
23 activities of a group called Justice for Subpostmasters
24 Alliance, JFSA. There has been no evidence to support
25 any of the allegations and we have no reason to doubt

16

1 the integrity of the system, which we remain confident
 2 is robust and fit for purpose."
 3 She hopes that that has clarified the position.
 4 You describe this in your witness statement as being
 5 given the brush-off?
 6 A. Yes.
 7 Q. You say in your witness statement that the
 8 subpostmasters that you had met seemed to you to be
 9 transparently honest --
 10 A. Yes.
 11 Q. -- that there was no suggestion that the introduction of
 12 a new computerised accounting system had thereby
 13 uncovered previously hidden fraudsters --
 14 A. No.
 15 Q. -- and, if anyone had made such a suggestion, you would
 16 have given it short shrift because of the self-evident
 17 honesty of the subpostmasters you had met because of the
 18 sudden rash of similar allegations, shortly after the
 19 installation of a new computer system --
 20 A. Yes.
 21 Q. -- and, therefore, you were not satisfied with being
 22 given the brush-off by Paula Vennells?
 23 A. No, I wasn't.
 24 Q. Can we turn to the letter to Government that you wrote
 25 to Ed Davey, UKGI00001395. You'll see he was the

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1 the losses that are being laid at the door of the
 2 subpostmasters?
 3 A. Yes.
 4 Q. You're making it clear, would you agree, that this is
 5 a country-wide issue --
 6 A. Yes.
 7 Q. -- and you refer to your previous correspondence. Did
 8 Mr Davey ever reply to you?
 9 A. I don't think he did, but I referred in this letter not
 10 only to my previous correspondence but also to
 11 a face-to-face discussion, at the top of the second
 12 paragraph, that I'd had sometime before when I must have
 13 raised it with him. But I don't think he replied to me,
 14 probably because he was told that Paula Vennells was
 15 replying to me herself.
 16 Q. I'm going to skip over the meeting, the early meeting
 17 between subpostmasters, Shoosmiths solicitors and
 18 Parliamentarians in Portcullis House on 27 February
 19 2012.
 20 A. Yeah.
 21 Q. That's addressed in paragraphs 37 and 38 of your witness
 22 statement and in detailed minutes of that meeting --
 23 there's no need to display this -- on SMIS0000247 at
 24 pages 4 to 7. But, in short, you chaired the meeting --
 25 A. Yes.

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1 Parliamentary Undersecretary of State in BIS at that
 2 time and you say:
 3 "I have been contacted by a number of constituents
 4 living in Odiham in Hampshire who are most upset at the
 5 fact that their local post office has been closed, and
 6 a long-standing employee, Paul Kemp, has been dismissed
 7 due to 'irregularities'. I would be most grateful if
 8 you would look into these related matters as a matter of
 9 urgency.
 10 "We discussed this matter some months ago, and I am
 11 most concerned that the 'irregularities' may be
 12 a continuation of the problems that Post Office
 13 employees have been having with the software system that
 14 reconciled takings. I am aware of 34 individual
 15 employees throughout the country who feel that they have
 16 been wrongly accused of fraud due to faults in this
 17 particular system."
 18 You say that it's a situation that has not been
 19 rectified, a situation which does not bring credit to
 20 the Royal Mail, and you note that you're writing to Moya
 21 Greene. Then you take up the point in the last
 22 paragraph about the closure of the Post Office,
 23 irrespective of the other issues that you raised.
 24 So, in this letter, would you agree you're drawing
 25 attention to the suggestion that Horizon is to blame for

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1 Q. -- you told the subpostmasters that you did not believe
 2 that they were anything other than honest --
 3 A. Yes.
 4 Q. -- and that the Post Office's line, as you described it,
 5 that there was nothing wrong with Horizon, was wholly
 6 implausible.
 7 A. Yes.
 8 Q. Is that a fair summary of the meeting?
 9 A. It is.
 10 Q. What was the idea of the meeting between subpostmasters,
 11 Shoosmiths and Parliamentarians?
 12 A. One MP alone can't achieve much but, if there is
 13 a nationwide issue, then getting more than one MP
 14 together makes for much greater effect, as we can see.
 15 Q. This led, I think, to a meeting with Alice Perkins,
 16 Alwen Lyons and you very shortly thereafter on 13 March
 17 2012; is that right?
 18 A. Yes.
 19 Q. I want to explore briefly with you a meeting that you
 20 had with Alice Perkins and Alwen Lyons. So the context,
 21 I think, for the meeting was a written communication,
 22 an email that you'd sent to Alice Perkins on
 23 23 February, if we can just look at that, please.
 24 POL00105470. If we look at the very bottom of page 1.,
 25 you say on 23 February:

20

1 "Dear Alice,
2 "You may remember that when we last met at, I think,
3 Ditchley Park [that's the conference I mentioned
4 earlier] I mentioned the issue of the Horizon computer
5 system in use at sub post offices throughout the country
6 and I said I had a real concern about the way some of
7 the subpostmasters in and outside my constituency had
8 been treated."

9 Over the page:

10 "May I please come and see you about it? I know it
11 is the position of the Post Office (supported by the
12 National Federation of SubPostmasters, though not by the
13 Communications Workers Union) that there is nothing
14 wrong with Horizon. I am deeply sceptical about this,
15 and I hope I can persuade you to look afresh at the
16 matter, rather than accepting there should be a closing
17 of ranks around the computer."

18 So you end this by saying you're deeply sceptical
19 about the Post Office's position there is nothing wrong
20 with Horizon and the purpose of the meeting that you
21 were seeking was to persuade her to look afresh at the
22 matter; is that right?

23 A. Yes.

24 Q. You say, rather than her accepting that there should be
25 a closing of ranks around the computer; is that what you

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1 Q. -- in which you had met some of the affect
2 subpostmasters and Shoosmiths, their legal
3 representatives. If we just scan through paragraph 2,
4 that's Alwen Lyons speaking; paragraph 3, Alice Perkins
5 inviting you to visit the model office to see how
6 Horizon works; you, in paragraph 4, making a counter
7 proposal to come to Old Street, so offering to come to
8 Old Street, but accompanied by a computer expert,
9 possibly somebody from Computer Weekly, and you made the
10 point that you put credence on their opinion because of
11 their involvement in the Chinook helicopter crash
12 inquiry and that you told them that Computer Weekly had
13 also been sceptical about Horizon.

14 Then paragraph 5, something I just want to
15 concentrate on. It records, and this is the Post
16 Office's own note:

17 "[Alice Perkins] explained that the system had been
18 independently reviewed by several people, including
19 [Royal Mail] Internal Audit and Deloitte (who had no
20 relationship with the Business or Fujitsu)."

21 You are recorded as saying that you were not
22 convinced that this had been done by IT experts.

23 I suspect you have got no recollection of the
24 meeting itself --

25 A. You are correct.

23

1 had thought had happened already?

2 A. Yes, it was. That's what had happened. The system was
3 "robust", we were told.

4 Q. You make a point in your witness statement about the use
5 of that word "robust".

6 A. Yes, it was clearly the line to take. There were lots
7 of people who were told to use this word, which implied
8 a sort of series of groupthinking seminars, which led to
9 the use of language, which is very important, and that's
10 what they chose, "robust".

11 Q. You were concerned, presumably, that that is what would
12 continue to happen, a closing of ranks around the
13 computer, if things were allowed to continue unabated?

14 A. Yes.

15 Q. So can I turn, then, with that context in mind, to the
16 meeting itself, POL00105481. It's the three of you, we
17 can see from the top: you, Alice Perkins and Alwen
18 Lyons. Paragraph 1, you started the meeting by
19 explaining why you were concerned about the Horizon
20 system and the support that subpostmasters received from
21 the business when they're faced with a discrepancy in
22 their accounts. The minute says you told them about
23 a recent meeting with you and another eight MPs, that
24 was the Portcullis House meeting that we mentioned --

25 A. Yes.

22

1 Q. -- but, from the minute, would you understand that you
2 were being told that Royal Mail Group Internal Audit was
3 independent of the Post Office?

4 A. Yes, I would have been sceptical about that
5 independence.

6 Q. Then, secondly, that there was a separate audit of
7 Horizon by Deloitte?

8 A. Yes, because there was something inherently implausible
9 about a new computer system being completely fault free.

10 Q. Have you, to this date, ever seen such an independent
11 audit of the Horizon system completed by Deloitte before
12 13 March 2012 when this meeting took place?

13 A. No.

14 Q. We can see what paragraph 6 says:

15 "[Alice Perkins] offered to consider a further
16 review of the system by an IT expert specifically
17 looking at the integrity of the data and discrepancy
18 errors thrown up in subpostmasters' balances."

19 You said that the training was not adequate --

20 A. Which is a different point.

21 Q. -- yes -- introduced the issue that the subpostmaster's
22 contract was over 100 pages long, written in '94, when
23 Horizon was not in place, and didn't explain the process
24 for making good errors clearly enough. That's, again,
25 a separate point. You suggested that the subpostmasters

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1 didn't get a copy of their contract until they had taken
2 up their appointment, by which time it was too late to
3 understand the full commitment they were making, and
4 that's a yet fourth point, I think.

5 Then we can see what's discussed in paragraphs 8 and
6 9. Then, over the page, at 10, in closing, you informed
7 Alice Perkins that there had been discussion about
8 an adjournment debate on the topic.

9 What was the purpose of mentioning that kind of
10 thing?

11 **A.** Well, just to say that it -- if there were eight MPs
12 involved in the meeting with Shoosmiths and
13 subpostmasters, then raising it in Parliament would be
14 a good way of bringing publicity and ministerial
15 attention to an issue that was clearly important.

16 **Q.** Is it a sort of an attempt to drive action by the Post
17 Office?

18 **A.** Yes, it must have been, not that I'd ever done
19 an adjournment debate by that stage but, nevertheless,
20 I suppose that's what I was doing, yes.

21 **Q.** Is this needs to be taken seriously --

22 **A.** Yes.

23 **Q.** -- one of the consequences, if it's not, may be
24 an adjournment debate?

25 **A.** Precisely.

25

1 that there is an issue with the accuracy of the Horizon
2 system: there isn't. The Horizon system has been
3 rigorously tested using independent assessors and robust
4 procedures."

5 The independent assessors point, is that the kind of
6 thing that was ever said to you?

7 **A.** Oh, probably. Although -- I mean, I can't remember the
8 words being used but probably, if that was what they
9 were saying to --

10 **Q.** Were they ever named? We saw in the meeting that it was
11 said that there was an independent audit commissioned or
12 carried out by the Royal Mail Group's audit function,
13 and Deloitte. These independent assessors, can you
14 remember whether any other names were given?

15 **A.** Well, it's 12 years ago now. I can't remember whether
16 names were used. It was the independence that I would
17 have been interested in rather than the names.

18 **Q.** Yes. We see that there is a very firm line taken in the
19 first part of that paragraph.

20 **A.** Yes. It seems odd.

21 **Q.** Then paragraph 3:

22 "Therefore when queries are raised, my team will
23 work with the postmasters to help identify the problem.
24 Very often the 'missing' funds are a keying or balancing
25 error that can be put right, and training given to

27

1 **Q.** Can we look, please -- and I'm dealing with this part of
2 the chronology in some detail because it may be
3 important in due course -- at a letter of 4 April that,
4 in fact, you weren't copied into but can we look,
5 please, at POL00107710. If we just look at the second
6 page, please, we can see it's from Paula Vennells.

7 **A.** Yes.

8 **Q.** Then back to the first page. It's a letter to Oliver
9 Letwin of 4 April 2012, and I just want to see whether
10 this, what is being said by Ms Vennells here, is
11 reflective of the kind of thing that Ms Vennells and
12 other senior executives at the Post Office were saying
13 to you at this time in the spring of 2012.

14 Oliver Letwin, just for context, was one of the MPs
15 who was amongst the group who was seeking to pursue this
16 matter in the same way as you?

17 **A.** Yes.

18 **Q.** Ms Vennells says:

19 "Dear Oliver

20 "I understand you raised a query on the robustness
21 of the Post Office Horizon system yesterday with Moya
22 Greene. I am grateful to Moya for passing this query on
23 to me."

24 Then Ms Vennells says this:

25 "The Post Office takes very seriously any perception

26

1 ensure it doesn't happen again. These checks and
2 procedures resolve virtually all discrepancies
3 satisfactorily."

4 So that's saying it's the subpostmaster's
5 responsibilities or fault, essentially?

6 **A.** Yes.

7 **Q.** "However, in some cases, which fortunately are very few
8 and far between, we have had to prosecute subpostmasters
9 for theft or false accounting and provide evidence which
10 substantiates our legal position. In every instance,
11 the courts have found in our favour."

12 Now, that's a false statement there, that "In every
13 instance, the courts have found in our favour", it's
14 just not true. Would you have known at that time that
15 that was a false statement?

16 **A.** No, I wouldn't.

17 **Q.** Would you, if the senior executive of the Post Office
18 was writing to you on Post Office headed paper and
19 formally as an MP and said "In every instance, the
20 courts have found in our favour" accept at face value
21 what they were saying?

22 **A.** Yes, I would. I would expect public officials, as Paula
23 Vennells was, to tell the truth. However, I would have
24 had, at the back of my mind, the knowledge that the Post
25 Office had been, as a matter of almost routine, telling

28

1 lots, and lots, and lots of subpostmasters that they
 2 were the only ones having these problems. That would
 3 have been at the back of my mind, I think. So I might
 4 have had some question about what they were saying.
 5 **Q.** Thank you. That can come down. I'm going to skip over
 6 the meeting that you and Oliver Letwin had with Alice
 7 Perkins, the Chairman of the Post Office; Paula Vennells
 8 the then CEO of the Post Office; Susan Crichton, the
 9 Legal and Compliance Director; Lesley Sewell, the Chief
 10 Information Officer; Rod Ismay, the then head of Product
 11 and Branch Accounting; and Angela van den Bogerd, the
 12 Head of Network on 17 May. It is addressed in detail in
 13 paragraphs 43 to 46 of your witness statement and in
 14 a comprehensive pack prepared for the meeting.
 15 The outcome of the meeting, is this right, was that
 16 the Post Office offered to give independent forensic
 17 accountants access to the Horizon system and for the
 18 Post Office to fund such an investigation?
 19 **A.** Yes. It was the first time I had heard the phrase
 20 "forensic accountants" and I didn't know what they were,
 21 but it sounded good and it turned out to be good.
 22 **Q.** This, I think, had been something that had been
 23 suggested by Andrew Tyrie MP back in the Portcullis
 24 House meeting of 27 February 2012 --
 25 **A.** Yes.

29

1 please. We can see the key messages to be delivered by
 2 Alice Perkins, under the "Who" column, in the
 3 introductions to the meeting:
 4 "Thank you for coming today.
 5 "The people around the table are ...
 6 "We understand you have raised some concerns ...
 7 "... we take this issue very seriously. This
 8 impacts the lives of individuals, public money is at
 9 stake, and so is our reputation.
 10 "We are open to feedback and we will provide you the
 11 information we have available, our aim is to be open and
 12 transparent.
 13 "We are hoping that you will find that we are
 14 handling these issues openly and fairly and would like
 15 your advice on how we best approach those who are
 16 sceptical ...
 17 "We are constantly looking at ways of improving our
 18 IT systems and the support we give ..."
 19 Then this:
 20 "Our IT systems are routinely audited and our
 21 recruitment and the training provides are independently
 22 reviewed so that we can make improvements."
 23 We will be exploring in due course the accuracy of
 24 that, IT systems being routinely audited. Then reading
 25 on:

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1 **Q.** -- and so I think you were pleased?
 2 **A.** Yes, very pleased, partly because the offer came from
 3 Paula Vennells, namely to have the forensic accountants.
 4 It was something that we wanted but when Paula Vennells
 5 offered it, we bit her hand off, as it were.
 6 **Q.** I just want to ask you for some details about what the
 7 Post Office said, through its senior representatives,
 8 that it was proposing these forensic accountants should
 9 investigate, so that we can see and we can compare what
 10 was proposed with what we ended up with --
 11 **A.** Yes.
 12 **Q.** -- at the end of the Second Sight investigation. Can we
 13 look, please, at POL00033825. This is something that
 14 I don't think you would have seen. It's a Post Office
 15 pack containing the documents set out in that index
 16 there, an agenda for the meeting, key messages that the
 17 Post Office wished to deliver.
 18 **A.** I think I saw this when I was asked to draft my witness
 19 statement.
 20 **Q.** Yes.
 21 **A.** Yes.
 22 **Q.** You wouldn't have seen it at the time?
 23 **A.** I certainly didn't see it at the time.
 24 **Q.** No. So they're essentially, I think, speaking notes in
 25 large part for the meeting. Can we turn to page 3,

30

1 "We are also considering an sudden audit of our
 2 end-to-end processes, systems and data. I'll come back
 3 to you at the end of the meeting to get your views."
 4 Is that the offer -- we'll come back to the later
 5 minute in a moment -- that you were pleased about,
 6 an external audit of our end to the processes, systems
 7 and data?
 8 **A.** No. I think that came later in the meeting. This was
 9 the introductory spiel and so I think the key messages
 10 involving the appointment of an independent forensic
 11 accountant came later.
 12 **Q.** Just skipping through, we'll get to the end in a moment,
 13 page 5, please. This is Lesley Sewell speaking, third
 14 bullet point:
 15 "Although we recognise that Horizon is not perfect,
 16 no computer system is, it has been audited by internal
 17 and external teams, it has also been tested in the
 18 courts and no evidence of problems found (of the nature
 19 suggested by JFSA).
 20 "Horizon was designed with integrity in mind from
 21 the very beginning."
 22 Then if we go on, please, to page 7, I think this is
 23 where Alice Perkins wraps up, where she comes back, as
 24 she promised to do, as we saw on that first page.
 25 Second bullet point in the bottom box:

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1 "We are [also] considering commissioning
 2 an independent audit as an assurance measure, but in
 3 light" --
 4 **A.** I think that was -- that was the one.
 5 **Q.** Yeah:
 6 "... but in light [of the fact] that there is no
 7 evidence that there is a problem, we need to determine
 8 if this is a good use of public money.
 9 "What are your thoughts?"
 10 Presumably, you bit the hand off?
 11 **A.** Yes.
 12 **Q.** What did you understand was being offered?
 13 **A.** That there would be an independent, deep dive into what
 14 had gone wrong with these subpostmasters who had been
 15 prosecuted or made to pay money, and that was exactly
 16 what Andrew Tyrie had suggested and what we needed, that
 17 somebody other than the Post Office would be looking
 18 into the workings of Horizon.
 19 **Q.** So that would involve, would this be right, looking at
 20 Horizon as an entire system, at the end-to-end process
 21 involved --
 22 **A.** Yes.
 23 **Q.** -- as well as other Post Office accounting procedures?
 24 **A.** Yes. One of the things that I had raised in one of the
 25 documents you've earlier shown me was the issue of the
 33

1 a number of years. Many MPs' constituents have been
 2 prosecuted for false accounting, theft and fraud, many
 3 protesting their innocence.
 4 "A meeting was convened in February at the House of
 5 Commons, attended by MPs and their constituents at which
 6 this matter was discussed."
 7 That's a cross-reference to the 27 February meeting
 8 at Portcullis House?
 9 **A.** Yes.
 10 **Q.** "Following this meeting, [you] had several private
 11 meetings with Ms Perkins and her colleagues to discuss
 12 how the issue might best be approached and resolved."
 13 That's a cross-reference to the meetings that we've
 14 just looked at.
 15 **A.** Yes.
 16 **Q.** "Alice Perkins then gave background information and the
 17 Post Office's perspective and introduced her colleagues.
 18 "Post Office Limited is now a completely separate
 19 entity from the Royal Mail. She arrived at the
 20 organisation in August 2011 and became aware of the
 21 issue soon after starting. She emphasised that the
 22 matter was a very serious one for the Post Office, whose
 23 business rests on its reputation as being trustworthy.
 24 She said the Post Office also recognised full well that
 25 the matter was also very serious for the subpostmasters
 35

1 helpline, the issue of training, the issue of the
 2 contract, and so, yes, to look into all of that.
 3 **Q.** It seems that there was an agreement to have a further
 4 meeting with a wider group of Parliamentarians and that
 5 was set for 18 June 2012?
 6 **A.** Yes.
 7 **Q.** This may be quite an important meeting, so I want to
 8 examine it in a little more detail, if we may. Can we
 9 look, please, at JARB0000001. I think these minutes
 10 were taken, is this right, by Janet Walker, your then
 11 Chief of Staff?
 12 **A.** Yes, that's correct.
 13 **Q.** We'll see that there are six MPs present, including you
 14 and Mr Letwin, plus representatives from three other
 15 MPs?
 16 **A.** Yes.
 17 **Q.** So nine MPs in total were either present or represented?
 18 **A.** Yes.
 19 **Q.** Then four Post Office people present: Ms Perkins,
 20 Vennells, van den Bogerd and Lyons?
 21 **A.** Yes.
 22 **Q.** Then scroll down, please. You introduced the meeting,
 23 which was limited to MPs and Post Office personnel only:
 24 "The issue of problems reported with the Horizon
 25 system has given rise to controversy dating back
 34

1 and mistresses involved as it was invariably life
 2 changing."
 3 So far, so good, I think?
 4 **A.** Yes.
 5 **Q.** Then, over the page, please:
 6 "She said that now was a time of enormous change at
 7 the Post Office and that it was important to give MPs
 8 confidence in the business and its reputation."
 9 Again, so far, so good:
 10 "She stated that the matter involved treading
 11 a tightrope regarding questions of money. The Post
 12 Office and its staff are stewards of large quantities of
 13 cash -- the cash does not belong to the Post Office; it
 14 is in transit as it comes through the Post Office.
 15 There is the issue of trying not to put temptation in
 16 people's way, but in any retail business, this is not
 17 possible."
 18 What did you or do you understand to be the point
 19 being made there about temptation being put in people's
 20 way?
 21 **A.** At the meeting of 17 May, with Oliver Letwin and me,
 22 Alice Perkins and Paula Vennells had both raised the
 23 problem of there being lots and lots of cash lying
 24 around in unexpected places, and whether this meant that
 25 they thought that that led subpostmasters into
 36

1 temptation and being inherently dishonest wasn't
 2 entirely clear but that was the issue that they were
 3 raising, I think, and we never really got to the bottom
 4 of that, but that's what the issue she was talking
 5 about.

6 Q. We then see that Ms Vennells picks up the temptation
 7 baton and says:

8 "She said that temptation is an issue, but that
 9 trust in the Post Office as a brand is absolutely
 10 paramount. Post Office needs competent, trustworthy
 11 people on staff, and its processes and systems must be
 12 transparent and must work well."

13 So, again, at the moment, the focus, I think, is all
 14 on the honesty and trustworthiness of the postmasters?

15 A. Yes.

16 Q. "Of the 11,800 subpostmasters and mistresses currently
 17 employed, only a tiny number are presenting as cases
 18 where there is an alleged of fraud involving the Horizon
 19 system, the problem therefore is relatively very small."

20 Then I want to go through what's later said here, as
 21 a series of assertions made. She said, according to the
 22 minute, that:

23 "The Horizon system is very secure."

24 The first assertion, assertion 1. Did you at this
 25 stage know whether that was true or false?

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1 A. I believed it was probably untrue, at that stage, mostly
 2 because of the experience that Jo Hamilton had had of
 3 seeing -- of telephoning the helpline, asking what to
 4 do, doing what they said and seeing the balance that she
 5 was alleged to be owing to have doubled in front of her
 6 eyes. So that assertion struck me as being untrue.

7 Q. Can we turn to the fourth assertion:

8 "It appears that some subpostmasters have been
 9 borrowing money from the Post Office Account/till in the
 10 same way that they might do in a retail business, but
 11 this is not how the Post Office works. Post Office cash
 12 is public money, and the Post Office must recover it if
 13 [it] goes missing."

14 Did you or would you take, from what is recorded as
 15 being said there, that the issue, according to
 16 Ms Vennells, was with postmasters putting their hands in
 17 the till rather than with Horizon?

18 A. Well, it's clearly possible that that might have
 19 happened in some cases but, if you don't have a robust,
 20 to use the word, Horizon accounting system, you can't be
 21 sure whether it has happened. So I thought it might
 22 have happened in some cases but to say that it happened
 23 in a lot of cases struck me as being -- needing to be
 24 examined and tested.

25 Q. Then the fifth assertion:

39

1 A. At this stage no, I didn't. We were going to have
 2 an independent investigation to see whether that was
 3 true or not.

4 Q. Did you accept what you were being told by the Chief
 5 Executive of the Post Office?

6 A. I did not accept that the Horizon system was very
 7 secure, no. That was a matter still to be investigated.

8 Q. Can I turn to the second assertion, assertion 2:
 9 "Every keystroke used by anyone using the system is
 10 recorded and auditable."
 11 Did you know whether that was true or false?

12 A. I didn't know whether that was true or false. That was
 13 a matter still to be investigated.

14 Q. Did you accept what you were being told by the Chief
 15 Executive of the Post Office?

16 A. No.

17 Q. She's recorded as continuing to say:
 18 "When things go wrong in a sub post office, there is
 19 a helpline which staff can call 7 days a week during
 20 office hours, and back-up staff who will help further if
 21 things go wrong. It is here that issues are normally
 22 resolved."
 23 Did you know whether that was correct, true or
 24 false, that, at the helpline stage, issues are normally
 25 resolved?

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1 "Every case taken to prosecution that involves the
 2 Horizon system thus far has found in favour of the Post
 3 Office."

4 Assertion 5.

5 We will come in a moment to look at that statement
 6 which, as I've said, is not a true statement. But did
 7 you know whether it was true or false at this time?

8 A. Well, what I knew about Jo Hamilton was that her case
 9 had been found in favour of the Post Office and yet it
 10 was her case that I was particularly questioning. So it
 11 may have been true, so far as I was aware, but I didn't
 12 place much credence in what she had said there.

13 Q. Can we go to the foot of the page, please. You'll see
 14 just in between that the minute follows largely the
 15 structure of the speaking notes that we've looked at,
 16 with Angela van den Bogerd now speaking to the two case
 17 studies. It notes there that they are attached. Do you
 18 think you might have got something from that pack that
 19 we saw?

20 A. Well, they were attached. I think I did see some case
 21 notes, yes. They are somewhere around in a large bundle
 22 of papers.

23 Q. Thank you. If we go to the foot of the page, Mike
 24 Wood MP asked the question, to which an answer is given
 25 later, so we should look at the question as a whole now:

40

1 "Mike Wood [MP] asked whether anyone at the Post
2 Office had entertained the thought that there might be
3 well be problems with the Horizon system, rather than
4 believing that there was not. He asked whether the Post
5 Office was saying that the system was 100% secure and
6 100% foolproof, making the point that it would be the
7 first software system implemented by government to be
8 so, were this the case."

9 Then if we go over to the top of the next page:

10 "Andrew Bridgen [MP] asked whether there had been
11 any case where the discrepancy was the fault of the
12 system."

13 There is then a discussion where it seems there was
14 a side tracking about the identity of the forensic
15 accountant. Then if you see three boxes from the bottom
16 there:

17 "Paula Vennells said that going back to Andrew
18 Bridgen's question, there had not been a case
19 investigated where the Horizon system had been found to
20 be at fault."

21 So there is then what I'm calling assertion 6.

22 Did you know, again, it's expressed in a different
23 way, whether that was true or false --

24 A. No.

25 Q. -- there had not been a case investigate where the

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1 had found errors in the operation of the Horizon system?
2 A. No, they didn't.
3 Q. They didn't mention the acquittal of Maureen McKelvey by
4 a jury in 2004, Mrs McKelvey having blamed Horizon for
5 the causing of losses of money which she was accused of
6 stealing?

7 A. No, they didn't.

8 Q. They did not mention the speedy acquittal of Suzanne
9 Palmer by a jury in 2007, Mrs Palmer also having blamed
10 Horizon at trial for the losses attributable or said to
11 be attributable to her?

12 A. No, they didn't.

13 Q. A jury question directed at the Post Office to the
14 effect of "What is Mrs Palmer supposed to do if she
15 didn't agree the figure that Horizon had produced",
16 which the Post Office had been unable or unwilling to
17 answer, and an order that the Post Office pay £78,000 in
18 costs?

19 A. No, they didn't.

20 Q. They didn't mention any of the following bugs, all of
21 which had been discovered and notified to the Post
22 Office by this time, the Callendar Square bug --
23 sometimes known as the Falkirk bug -- operative, by the
24 Post Office's admission, between 2000 and 2006 and, on
25 the findings later of Mr Justice Fraser, until 2010?

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1 Horizon System had been found to be at fault?

2 A. No, I didn't.

3 Q. So we've seen the assertions made and the assurances
4 given to nine MPs or their representatives. Would you
5 agree overall that this is a fair summary: the problem
6 is that a small number of postmasters borrow money from
7 the till; the problem is not Horizon; every prosecution
8 involving Horizon has found in favour of the Post
9 Office; and not a single case existed where, on
10 investigation, the Horizon system was found to be at
11 fault?

12 A. Yes.

13 Q. I think it follows that Alice Perkins, Paula Vennells,
14 Angela van den Bogerd and Alwen Lyons did not disclose
15 to you and the other eight MPs or their representatives
16 the following: firstly, anything about the
17 Julie Wolstenholme case --

18 A. No, they didn't.

19 Q. -- in which expert evidence had been served by a man
20 called Jason Coyne concerning bugs in the Horizon system
21 and which case was subsequently settled by the Post
22 Office?

23 A. They didn't disclose that, no.

24 Q. They didn't mention the case of Lee Castleton and the
25 obtaining of the a report from BDO Stoy Hayward, which

42

1 A. No, they didn't mention.

2 Q. They didn't mention the receipts and payments mismatch
3 bug of 2010?

4 A. No.

5 Q. The suspense account bug that was operative between 2010
6 and 2013?

7 A. No.

8 Q. They didn't mention the Dalmellington bug, operative
9 from 2010 and the fact that it was still operative at
10 the time of this meeting?

11 A. No.

12 Q. They didn't mention the remming in bug operative in 2010
13 or the remming out bugs operative in 2005 and, again, in
14 2007?

15 A. No.

16 Q. They didn't mention the local suspense account bug
17 operative in 2010?

18 A. No.

19 Q. The reversals bug operative in 2003?

20 A. No.

21 Q. The Giro bank discrepancy bugs operative in 2000, 2001
22 and 2002?

23 A. No.

24 Q. They didn't mention that consideration had been given to
25 the commissioning of an independent expert review and

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1 report on Horizon in December 2005, and again in March
 2 2010, but that on each occasion the Post Office had
 3 decided against it, on the latter occasion seemingly on
 4 the grounds that it might be disclosable in criminal
 5 proceedings?
 6 **A.** They didn't mention that.
 7 **Q.** They didn't mention problems with the show called ARQ
 8 data and whether those issues should be revealed to
 9 criminal courts who are hearing criminal charges against
 10 subpostmasters based on ARQ data and of which the Post
 11 Office had been notified?
 12 **A.** No.
 13 **Q.** Does it follow that your state of knowledge at this
 14 time, based on what the Post Office board member and
 15 executive members were telling you, was that you were
 16 unfair of any bugs, errors or defects which had been
 17 detected in Legacy Horizon or which were then evident
 18 and emerging in Horizon Online?
 19 **A.** Yes, I was unaware. I think we were all unaware, but
 20 Mike Wood was raising the question: is this the only
 21 absolutely perfect computer program in existence?
 22 **Q.** You were unaware of the problems with the so-called ARQ
 23 data --
 24 **A.** I was.
 25 **Q.** -- and its presentation to criminal courts?

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1 wanted what your memory was about it. Thank you.
 2 What time shall we start again, Mr Beer?
 3 **MR BEER:** Can we say 11.30, please?
 4 **SIR WYN WILLIAMS:** Yes, of course.
 5 (11.14 am)
 6 (A short break)
 7 (11.31 am)
 8 **MR BEER:** Sir, good morning, can you see and hear us?
 9 **SIR WYN WILLIAMS:** Yes, thank you, yes.
 10 **MR BEER:** Lord Arbuthnot, in my list of 16 or 17 things that
 11 were not mentioned to you against being told that every
 12 prosecution involving Horizon had found in favour of the
 13 Post Office and that not a single case existed where on
 14 investigation the Horizon system was found to be at
 15 fault, I omitted to include one, that of Ms Nichola
 16 Arch, who was acquitted in 2000, so very early on. Was
 17 that something that was mentioned to you?
 18 **A.** No, that was not something that was mentioned to me.
 19 **Q.** I had mentioned the jury acquittal in 2004 of Maureen
 20 McKelvey and the jury acquittal of Suzanne Palmer in
 21 2007, that's a third jury acquittal not mentioned.
 22 **A.** Right.
 23 **Q.** In that list of 16, now 17, issues that were not
 24 revealed to you at the meeting that we were talking
 25 about in mid-June, does the same apply to all of the

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1 **A.** Yes, completely unaware of that.
 2 **MR BEER:** Sir, that's an appropriate moment, if it's
 3 convenient to you, to break in this line of questioning.
 4 **SIR WYN WILLIAMS:** Certainly, Mr Beer. I will just ask you,
 5 Lord Arbuthnot, if I may: we have reached the summer of
 6 2012 and it may be that Mr Beer will pursue this further
 7 but just so that it's -- now that it's stuck in my mind,
 8 can I ask you this: in any of these discussions, was the
 9 role of Fujitsu mentioned at all?
 10 **A.** It's hard to remember precisely when Fujitsu's role came
 11 up. Certainly it was raised at some stage and I believe
 12 it had been raised before now, yes.
 13 **SIR WYN WILLIAMS:** Right.
 14 **A.** But I can't remember exactly when it was first raised.
 15 **SIR WYN WILLIAMS:** But were you given a kind of summary, for
 16 want of a better description, of the role that Fujitsu
 17 might be playing in providing information which
 18 permitted the Post Office, either to prosecute or take
 19 disciplinary action against subpostmasters?
 20 **A.** No, I don't think I was, not at this stage.
 21 **SIR WYN WILLIAMS:** Fine. Then I wouldn't ask you any more
 22 and, if Mr Beer wants to take it up, then he may but
 23 I was just conscious that, in the documents we looked
 24 at, which may only, of course, be a small representative
 25 sample, there was no reference to Fujitsu, so I just

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1 meetings you had with senior Post Office managers, and
 2 by that I mean the meeting with Alice Perkins and Alwen
 3 Lyons on 13 March 2012?
 4 **A.** Oh yes, the same applies. I was not told "Here is
 5 a list of bugs that you ought to take into account", no.
 6 They failed to do that.
 7 **Q.** I might divide it into three. One is civil and criminal
 8 cases, the second is bugs and the third is consideration
 9 in the past of independent investigations?
 10 **A.** Absolutely. They did not do that.
 11 **Q.** Does the same apply to the meeting with Alice Perkins
 12 and Paula Vennells on 17 May 2002?
 13 **A.** Yes.
 14 **Q.** In all of this time, did any of them ever mention the
 15 facts and matters which I've listed, 16 or 17 of them?
 16 **A.** No.
 17 **Q.** Now, at or in preparation for this meeting of 18 June
 18 2012, there was also a pack prepared, just like the last
 19 meeting of 17 May 2012 of the Post Office, and I just
 20 want to look at some of the things that the senior
 21 representatives of the Post Office were intending to say
 22 or were briefed to say, as opposed to what the minute
 23 actually records them as actually having said. Can we
 24 look at POL00096640. Can you see this is in similar
 25 format, a pack for the 18 June meeting?

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1 A. Yes.

2 Q. Can we go to page 4, please. This is the part that sets
3 out the Paula Vennells briefing note, speaking note or
4 lines to take. Can we look at the fifth bullet point,
5 please, where she is briefed to say or to include in the
6 meeting:

7 "I am confident about the integrity of Horizon; it
8 was built on robust principles of reliability and
9 integrity. It has undergone many external audits and no
10 problems of this nature have ever been raised."

11 Then, on a technical level, 1:

12 "An audit trail is created for each transaction
13 which means we can look at all transactions done at the
14 counter and see what happens to them subsequently.

15 "Each transaction is protected with a digital
16 signature to prevent change or tampering, which means
17 that if someone was able to penetrate the many layers of
18 security -- they wouldn't be able to unlock the seal
19 that protects the transaction -- this prevents any
20 malicious manipulation.

21 "Reconciliation processes automatically detect any
22 problems, which means if there is a problem, deliberate
23 or otherwise, it would be caught on the reconciliation
24 report."

25 Did you or would you take such a statement to mean

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1 Alan Bates and Kay Linnell, a forensic accountant?

2 A. Yes.

3 Q. Then there was a series of exchanges of correspondence
4 between you and Alan Bates, which I'm not going to
5 address but is the long and the short of it that MPs,
6 through your offices, started to send individual cases
7 to Second Sight after their appointment?

8 A. Yes, and it -- although it may have been via me or my
9 office, probably was.

10 Q. So you were a hub --

11 A. I was.

12 Q. -- for the forwarding of such cases?

13 A. Yes.

14 Q. I think it's right that your office didn't vet or decide
15 which cases should go forwards or not?

16 A. No, we would have been in no position to do so.

17 Q. Can I turn to some early reporting back from Second
18 Sight. I think it's right that in March 2013 you
19 received some early feedback from Second Sight on the
20 investigations that had, by then, taken place and this
21 caused the meeting to be scheduled for 25 March 2013 at
22 Portcullis House. In advance you wrote a letter to
23 Alice Perkins on 7 March 2013 and I'd like to look at
24 that, please. POL00097588. 7 March 2013, you to Alice
25 Perkins. If we can blow up the text, please:

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1 that remote access to alter the branch accounts was not
2 possible?

3 A. I would have taken that to mean that, yes.

4 Q. The conclusion of the meeting was that an independent
5 review or investigation should be undertaken?

6 A. Yes.

7 Q. You address in your witness statement and the documents
8 exhibited to it, the process by which Second Sight came
9 to be appointed and can I just summarise and see whether
10 this is correct, please. Firstly, Second Sight was
11 identified by Susan Crichton of the Post Office and that
12 was because she had a previous connection with Ron
13 Warmington at GE Capital?

14 A. Yes.

15 Q. It was identified that it was necessary for relevant MPs
16 and the subpostmaster community, including Alan Bates,
17 who was by now undertaking a leading role in
18 representing some of the subpostmasters, to be satisfied
19 as to the competence and independence of Second Sight?

20 A. Yes.

21 Q. Therefore, meetings took place, firstly on 4 July 2012,
22 between Second Sight and five MPs including you, which
23 was essentially a species of vetting interview?

24 A. Yes.

25 Q. Secondly, on 12 July 2012, between Second Sight, you,

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1 "As you know, I am hosting a meeting on 25 March ...
2 at Portcullis House ... about the subpostmaster/mistress
3 issue."

4 That the meeting that we're going to turn to:

5 "The meeting is to take the form of an update from
6 Ron Warmington and Ian Henderson of Second Sight on how
7 their investigations are proceeding. I wonder if you
8 might be free to attend, along with any of those of your
9 colleagues you deem it is appropriate to invite? I have
10 invited all MPs who have constituents who have raised
11 this matter with them, Alan Bates, who heads the
12 Alliance for Justice for Subpostmasters, and Kay Linnell
13 who is working with him. I do not propose inviting
14 [the] media."

15 Then we can scan over the remaining paragraphs on
16 that page. Go over the page, please. If we look, you
17 say at the top of the page:

18 "I would like to raise two matters here, and these
19 are things that may need a conversation between you and
20 me ... before the meeting. In my discussions with Ron
21 and Ian, I gather that questions have been raised offer
22 the absolute integrity of Horizon, though without their
23 being so fundamental as to say that the system is not
24 fit for purpose. Since it is a system that remains in
25 current use, there is the risk that existing

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1 subpostmasters and mistresses may find themselves in
2 exactly the same position as those whose cases are being
3 investigated. I know definitive results are not yet
4 available, but I hope the Post Office would be ready to
5 address this issue."

6 I think it follows from that that you had, by that
7 stage, received information from Second Sight that
8 questions over the absolute integrity of Horizon were
9 being raised by them, Second Sight.

10 A. Yes.

11 Q. In the last paragraph --

12 A. Not necessarily by them. Questions were being raised at
13 least in the presence of Second Sight, possibly by
14 Second Sight, or possibly both.

15 Q. I understand. You say in the last paragraph that
16 you're:

17 "... impressed beyond ... expectations with not only
18 how the investigations are proceeding, but of your
19 continuing support. [You could not] recall a more
20 important campaign, nor one where the end result has
21 been so consistently supported by all parties involved.
22 You have my gratitude and admiration for how the Post
23 Office is handling this."

24 You tell us in your witness statement that at the
25 early stages of the Second Sight investigation you

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1 Q. I think it's right to say that the Post Office did not
2 react well to this letter that you wrote them?

3 A. I think it is right to say that.

4 Q. Can we look at what you say about that in your witness
5 statement, please, at page 42, paragraph 80, please, the
6 foot of the page. You say:

7 "My letter caused strong pushback from the Post
8 Office, and on 19 March there was a meeting between
9 myself and Alice Perkins. It appears from a speaking
10 note that Janet Walker [your Chief of Staff] wrote for
11 me for a telephone call on 20 March 2013 between myself
12 and Ian Henderson that at a meeting on 19 March Alice
13 Perkins said amongst other things: that the Post Office
14 didn't believe anything was wrong with Horizon; that
15 they were very concerned that any opinion being formed
16 by Second Sight at this stage was being communicated;
17 that Second Sight should not be expressing an opinion,
18 not least as [Post Office] hadn't had a right of reply;
19 that there was a limit to the Post Office's willingness
20 to continue funding investigations; that it seemed that
21 there would be some sort of deadline for cases of the
22 end of February ... and that the Post Office would not
23 attend the meeting of 25 March but there would be
24 an open letter from the Post Office available for
25 distribution at that meeting; and that the Post Office

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1 believed -- and this is my summary not yours -- that the
2 Post Office was entering into the enterprise in good
3 faith.

4 A. Yes.

5 Q. Did that remain your belief?

6 A. By this stage, yes. By the time I wrote this letter,
7 I certainly did believe that.

8 Q. We'll come later to when seeds of doubt started to be
9 sown.

10 A. Yes.

11 Q. But can you identify, in summary, what those seeds were
12 and when they occurred?

13 A. The summary of the seeds of doubt arose through my
14 initial fears about the Post Office's approach to the
15 truth, in terms of telling people like Jo Hamilton that
16 "You're the only person that was involved". But let's
17 ride over that.

18 There was a degree of legal battlefield that arose.
19 There was a degree of delay in providing Second Sight
20 with information. There was a degree of delay in
21 providing the documents that the Post Office had
22 promised to give Second Sight, being absolutely open and
23 transparent, and yet they weren't. There was
24 a slowness, a secrecy, a general slowing everything down
25 that worried me.

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1 would expect to be ready to attend a meeting with MPs in
2 perhaps June."

3 Lord Arbuthnot, I don't understand. Can you help
4 me. I thought the Post Office had said they wanted
5 their systems, processes and data independently
6 assessed.

7 A. Yes, with absolute openness and transparency. I didn't
8 understand it either. I was a bit surprised because
9 I thought my letter to the Post Office of 7 March had
10 been rather a nice one, so ...

11 Q. They'd said that they were invested in securing the
12 truth and that they wished to be open and transparent
13 with subpostmasters and with the public and yet here was
14 the Chairman saying to you that the independent
15 investigators should not communicate their opinions that
16 their funding may be withdrawn and that they were
17 pulling out of a meeting?

18 A. Yes, which didn't sit well with the way that Second
19 Sight had been appointed, which was almost a joint
20 exercise between the Post Office and the MPs and the
21 JFSA, and yet it seems that the Post Office was saying
22 that Second Sight were not to talk to us, which seemed
23 to us to be odd and wrong.

24 Q. So the meeting went ahead with you, with other MPs, with
25 the JFSA, and with Second Sight, but without the Post

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1 Office?

2 A. Yes.

3 Q. We've got your speaking notes for that meeting, your

4 Chief of Staff's meetings of that meeting and Second

5 Sight's speaking notes. I just want to look at the last

6 of those, which is JARB0000047. These are the Second

7 Sight notes for the meeting of 25 March 2013.

8 There is a summary in the first, second, third and

9 fourth paragraphs. Then scroll down, please.

10 Then at the foot of the page, they, Second Sight,

11 recall that:

12 "The fast track review process had identified the

13 following 7 issues as being a significant feature in one

14 or more of the case submitted:

15 "1. Transaction anomalies following communications

16 or power failures;

17 "2. 'Rogue' transactions not ended by

18 [subpostmasters] or their staff;

19 "3. Missing or duplicated transactions associated

20 with postage labels, phone cards, Giro payments, ATMs or

21 cheques;

22 "4. Training and Support issues;

23 "5. Loss of transaction audit trail being available

24 to [subpostmasters];

25 "6. Accounting issues at the end of the trading

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1 work.

2 Q. It seems that, in turn, what was said at the meeting

3 caused concern with JFSA, and can we look, please, at

4 Mr Bates' letter of 1 April 2013, JARB0000049. This is

5 a letter from you to Mr Bates. He says:

6 "Having had the opportunity to reflect on the

7 meeting at Portcullis House [the one we're talking

8 about], I thought it important to convey to you the

9 concerns that both Kay Linnell and I took from the

10 Second Sight report and the briefing document they

11 produced for the meeting."

12 That's the one we've just looked at.

13 A. Yes.

14 Q. "Whilst every individual's case is extremely important

15 to that individual, it is also doubly so in the weight

16 that it adds to the systemic failures with Post Office

17 and their Horizon system. These are issues which we at

18 JFSA have been raising for years, and having worked

19 closely with Second Sight over the last few months, can

20 see that they too have independently arrived at the same

21 conclusions through their analysis of the cases.

22 "We can neither understand why Second Sight was so

23 reluctant to bring the systemic failures to the fore at

24 the meeting, nor see why the focus of the investigation

25 has not been now centred on them. These systemic

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1 period; and

2 "7. The contract between [the Post Office] and

3 [subpostmasters]."

4 If we go over the page, please. They said:

5 "The investigation is progressing well. A number of

6 difficult issues have been satisfactorily resolved and

7 an excellent working relationship has been established

8 with both JFSA and [Post Office]. Second Sight has

9 regular meetings with senior representatives of [the

10 Post Office] and is grateful for the support [the Post

11 Office] is providing. The investigation is complex and

12 involves looking at events that occurred over a long

13 period of time -- in some cases 7 or 8 years. We are

14 still at the evidence gathering stage, particularly for

15 cases submitted in the last few weeks, and it is too

16 early for us to reach even preliminary conclusions on

17 the matters under review. This is a fact based

18 investigation involving complex information technology

19 and it is important to allow all relevant parties to

20 submit evidence on the matters under review."

21 The seven features that we saw on page 1, did you

22 understand these to be established or findings by Second

23 Sight at that point or is that to be qualified by what's

24 said in this penultimate paragraph here?

25 A. I thought that they were things that required further

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1 failures are proven facts, and are at the root of most

2 of the [subpostmaster] cases. Although from the Second

3 Sight briefing document, it seems that they are only

4 going to be treated as an adjunct to the issue of the

5 cases, to the point where only the first three they list

6 may be featured in their forth coming report.

7 "The items I am referring to from their document are

8 [then he lists the seven of them].

9 "We fully appreciate more work has to be undertaken

10 to draw together the descriptions of each of the

11 systemic failures recognised so far, and the others

12 known about, but for whatever reason not appearing on

13 the list. Yet the work involved would be minor in

14 comparison to labouring through the individual cases

15 first. These systemic failures are also ... for others

16 to comprehend without the requirement of an in-depth

17 knowledge of the finer points ...

18 "These systemic failures should now become the

19 yardstick that the individual cases are measured

20 against. This approach would [be] quicker and far more

21 [effective] method of addressing the whole issue and

22 would minimise the information required from POL, which

23 is the main cause of the slow progress Second Sight has

24 made with the individual cases.

25 "There does seem to be far too much sensitivity in

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1 not requiring POL to address these systemic failures
2 now, rather than waiting until a report is produced
3 later in the year."

4 In your estimation at the time, were these fair
5 points that Mr Bates was making?
6 **A.** It was probably beyond my technical understanding of the
7 way Horizon worked but I thought that these were points
8 which certainly needed to be answered, both by Second
9 Sight and by the Post Office. There was, at some stage
10 a dispute about the meaning of the word "systemic" and
11 Second Sight used it eventually to mean a system-wide
12 set of problems, whereas Alan Bates was using it to mean
13 a problem with the system, wherever it struck, and the
14 Post Office grabbed the most favourable to them meaning
15 of the word "systemic", and Alan Bates pursued the least
16 favourable to the Post Office use of the word
17 "systemic".

18 **Q.** Did you gain any sense at this time of whether the Post
19 Office's intervention by the letter from Alice Perkins
20 and the refusal to attend the meeting, the strong push
21 back that you mentioned earlier, had itself had
22 an effect on the strength of view that Second Sight held
23 or at least the way it was prepared to present such
24 views?

25 **A.** I'm not sure exactly what you're asking there. I did

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1 an email exchange between them and Alan Bates under
2 paragraph 2:

3 "You have mentioned 'numerous miscarriages of
4 justice' and it's pretty clear that James has also
5 focused on that ... as has POL's top management. You,
6 Kay, Ian and I all know how much reliance has been
7 placed by the courts (Criminal and Civil) on [the Post
8 Office's] assurances (such as that 'there is no remote
9 access to the system or to individual branch terminals
10 which would allow accounting records to be manipulated
11 in any way'). As you know, Alan, several of the spot
12 reviews have presented what appears to be evidence that
13 completely undermines and disproves statements like
14 that. I am pretty certain that, in the event that even
15 one of those spot reviews (for example SR005 the
16 Bracknell Basement/Rudkin one) turns out to be
17 irrefutable, then James will completely earned the
18 implications, as I'm sure will POL's senior management."

19 Was that issue mentioned by you on the call to Paula
20 Vennells?

21 **A.** Well, it's hard to be sure of what was said, well,
22 10 years ago, in a call, but it was a very important
23 issue and I would have thought it probably was, yes.
24 Remote access would have completely undermined the Post
25 Office's position.

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1 think that this was the first time that the Post Office
2 had really objected to what Second Sight was doing and
3 that might well have a consequence on Second Sight.

4 **Q.** Thank you. I think that answers the question.

5 You had a telephone conference call with Paula
6 Vennells as a consequence of this, for which your Chief
7 of Staff prepared a briefing or speaking note. Can we
8 look at that, please. JARB0000052. The call is at the
9 request of the Post Office, following the meeting on
10 25 March:

11 "The Post Office is nervous that the MPs are wanting
12 individual cases resolved rather than following the
13 existing approach taken by Second Sight.

14 "An earlier meeting with Alice Perkins demonstrated
15 the concern that the Post Office had been shown no
16 evidence of problems with Horizon. Final para of this
17 note (Second Sight to Alan Bates) indicates that they
18 may have found something."

19 I should have said that you tell us in your witness
20 statement that you believe that the conversation with
21 Paula Vennells went much along the lines of this
22 briefing note.

23 Can we go to the second page, please. The foot of
24 the page, please. So you're here rehearsing --
25 Mrs Walker is rehearsing for you -- the contents of

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1 **Q.** Why so?

2 **A.** Because, if Fujitsu or the Post Office can manipulate
3 a subpostmaster's accounts without the subpostmaster
4 knowing about it, then how can you prosecute that
5 subpostmaster for something which could not be provably
6 down to the subpostmaster? It might have been an action
7 by the Post Office or by Fujitsu. It would, I think,
8 completely undermine the question of the stand of proof
9 required in a criminal trial.

10 **Q.** So, for you, was it an important or an unimportant
11 matter?

12 **A.** It was central to the entire business.

13 **Q.** So this isn't a record of the call, it's not a minute
14 made of the call, it's a briefing for the call?

15 **A.** Yes.

16 **Q.** In this part of it, it's not a narrative of what to say;
17 it's a recitation of an email of about ten days
18 before --

19 **A.** Yes.

20 **Q.** -- between Second Sight and Mr Bates, but referring to
21 the Bracknell basement/Rudkin Spot Review. Your
22 evidence as I understand it, is you believe that this
23 issue of remote access was addressed in the call with
24 Paula Vennells?

25 **A.** I think it would have been, yes.

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1 Q. Can you not go any further than that, in saying the
2 detail that, in fact, you mentioned?

3 A. I can't go any further than that, because it may well be
4 that, at this stage, the Bracknell basement/Rudkin issue
5 was something which Second Sight was still trying to get
6 final proof about. I can't remember whether at this
7 stage the Post Office was still denying that that
8 meeting had ever taken place and that Second Sight were
9 trying to get email evidence. I can't remember exactly
10 when that was resolved.

11 Q. Can we turn to a new document, please, POL00098379,
12 which is the Post Office's minute of the call.

13 SIR WYN WILLIAMS: When you say "new", Mr Beer, do you mean
14 very recently disclosed?

15 MR BEER: I mean new to Lord Arbuthnot.

16 SIR WYN WILLIAMS: Right. Fine. Just so that I am clear.
17 Thank you.

18 MR BEER: I don't think you had this when you made your
19 witness statement?

20 A. No, I didn't but I was shown it this morning before
21 I came in, and it -- I think it may show that -- if we
22 go down a bit, it may show that the Rudkin issue was
23 raised.

24 Q. Yes, so this is -- just to be clear, we've looked at
25 your briefing notes for the purposes of the call, we've

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1 Q. Why was that?

2 A. Because of the standard of proof required in a criminal
3 prosecution. You need to be sure that the criminal
4 activity has been done by a subpostmaster accused, as
5 opposed to having been done by somebody else.

6 Q. Then the sixth bullet point, which is linked to the
7 fourth, you're recorded as saying:

8 "... we should not go ahead [ie I think the Post
9 Office should not go ahead with prosecutions,
10 presumably] until [the Post Office] can move that there
11 is no remote access to the system or branch terminal
12 which can change the [subpostmaster's] account. (He did
13 not say so but I think [Second Sight] have suggested
14 this)."

15 Does that help you to recollect with how the
16 conversation went?

17 A. Well, if I -- I certainly wouldn't question that
18 I raised that, if this is what their minute says. No,
19 I must have raised it, as they say I did. I think
20 I would not have told Paula Vennells that Second Sight
21 had suggested it, but it was something that I think
22 Andrew Bridgen had been raising consistently because his
23 constituent was Michael Rudkin.

24 Q. But this, in any event, is a record of, I think,
25 Ms Vennells noting that Second Sight had suggested that

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1 seen the "Rudkin issue", I'll call it in summary,
2 mentioned in it, we've heard what your recollection is.

3 Can we look, please, at page 2 of the Post Office's note
4 of the call, and look four bullet points in. I think
5 that's a separate issue.

6 A. Yes, but if you look at six bullet points in, you'll get
7 to what you want, I think.

8 Q. Yes, you're quite right. Yes, I meant to ask about four
9 bullet points in because it's the run-up to the
10 conversation in bullet point 6. We can just start at 4:
11 "JFSA raised a concern with James that the Post
12 Office is continuing with prosecutions despite the
13 review taking place, predicated on the view that there
14 is 'nothing wrong with Horizon'. [You] did not think
15 that we should be prosecuting on the basis [ie that the
16 Post Office should be prosecuting on that basis]."

17 Then Ms Vennells then says:
18 "I think because [Second Sight] have made noises
19 about finding something."

20 She is recorded as promising to you to get back on
21 that point.

22 On that point, was it your view that the work on
23 Second Sight affected the propriety of continuing to
24 prosecute?

25 A. Yes.

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1 there could be remote access to the system or a branch
2 terminal which could change the subpostmaster's account?

3 A. She was saying that they might have done.

4 Q. Yes.

5 A. Yes.

6 Q. We've seen that one of the points that the Post Office
7 was taking at this stage in the narrative was that
8 Second Sight should not be saying anything to anyone,
9 unless and until the Post Office had had the opportunity
10 to respond to the points that Second Sight was putting
11 to the Post Office?

12 A. Yes.

13 Q. I just want to look at what Second Sight was saying to
14 you about that. JARB0000053. This is an email the next
15 month, on 12 June, from Ron Warrington of Second Sight,
16 and he says:

17 "I'll send a proper response to your latest email
18 later today ... I don't think we need your help in
19 getting [the Post Office] to respond to the spot
20 reviews. They are RESPONDING ... but not yet in a form
21 that will really WORK in our interim report or in the
22 8 July meeting. They are still -- understandably
23 I suppose -- incredibly defensive and nobody -- at the
24 levels producing the responses -- is ready to give
25 an inch. They probably fear it will be career death to

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concede any failings whatsoever. We have consistently and clearly asked for short, easy-to-understand, honest and complete answers to the assertions that we have put forward. What we are getting are highly technical, multi-page responses that will appear to many to have been crafted so as to avoid actually giving any answers to those assertions and allegations at all. Without wishing to burden you with the detail, the attached is a pretty good example ... and shows my exasperation in trying to get them to ANSWER THE BLASTED QUESTIONS."

Was this email that you received here and what Second Sight were then saying about the Post Office's approach, at this time, a recurrent theme?

A. I think it was, particularly the use of the word "defensive".

Q. You've addressed in your witness statement, it's paragraphs 100 to 105, alongside numerous contemporaneous documents exhibited to that part of the statement, the issues arising from the publication of the Second Sight Interim Report on 8 July 2013 and, save for one point, I'm not going to explore that. The exception is the role of Second Sight in relation to criminal cases. Can we just turn up paragraph 142 of your witness statement, please, which is on page 75.

We are jumping forwards significantly here, we are

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to the bottom of.

Q. The "they" in that sentence early on, "Any documents that they considered relevant", means any documents that Second Sight -- is that right?

A. Second Sight considered relevant.

Q. Can we look, can we go back in the chronology, then, to July 2013, and look at the notes of a meeting that you held in Parliament on 8 July 2013 after the publication of Second Sight Interim Report. It's POL00029664. I think this is a meeting after the publication that day of the interim report between Second Sight, Alan Bates, Kay Linnell, Shoosmiths and a number of MPs.

Can we look, please, at the bottom of page 3. Right at the bottom:

"Andrew Bridgen MP asked Second Sight if they believed the issues they had identified had an impact in relation to the historic convictions."

Then over the page, please:

"Second Sight said that was a legal question which they were not qualified to answer and they did not consider it was appropriate to express an opinion. They have to present facts and it is for others to consider the impact on any historic cases."

Firstly, would you agree with Second Sight's characterisation of the limitations of their

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into January 2014 but it's the background to the questions that I'm going to ask you. This is a conversation that happened with Paula Vennells on 28 January 2014. Then you say:

"... she then said that Second Sight would not be advising Post Office on criminal cases or prosecution policy as they were forensic accountants and not lawyers. I believe that at the time this struck me as wrong. It was at odds with what she had just said about not restricting Second Sight's ability to investigate the issues with Horizon. Accountants in their training and work have a great deal to do with criminal cases and prosecution."

And then there's some other material.

In relation to the first part of the Second Sight work, what was your understanding and expectation of the extent to which Second Sight could investigate cases that had resulted in criminal proceedings or a criminal conviction?

A. My understanding was that they could have the complete openness and transparency that Paula Vennells had promised me and access to any documents that they considered to be relevant, including documents that were confidential, in order to get to the bottom of the issues that the Post Office told us they wanted to get

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professional expertise?

A. I'm not sure I would, really. The key issue with the appointment of Second Sight was that they were going to have to look at a number of different issues -- computer programming, accountancy, the legal implications arising out of those things -- and the key issue was that they should be independent of the Post Office. And so I had rather greater faith in Second Sight's legal expertise than it seems they did and particularly since they had discovered a potential prosecution of Jo Hamilton on the basis of theft, when there was no evidence. They had raised that.

And that was an ethical issue which seemed to have passed by the Post Office lawyers, who ought to have picked it up. So Second Sight's limitations in their own minds, on their own availability, was not something that I would have accepted.

Q. As a separate issue, accepting the limitations that they themselves accepted, would that, in your view, have amounted to a proper bar in investigating the facts of any cases that had ended up as prosecutions or convictions?

A. No. I don't think -- I mean, what we had been promised was total transparency and total openness. Second Sight were the independent investigators going into the Post

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1 Office to achieve that total transparency and openness.
 2 They were the people to look into these things, and so
 3 I wasn't prepared to accept any bar on what they were
 4 looking at.

5 **Q.** Can I just take you to their engagement letter with the
 6 Post Office, please. POL00000213. This is moving on to
 7 the second part of the enterprise, the ICRMS, but may
 8 tell us something about the earlier part of the
 9 enterprise too. Can we look at page 6, please.
 10 Clause 5.1, if you scroll down.

11 "In providing the services, Second Sight shall:
 12 "act with the skill and care expected of qualified
 13 and experienced accountants; it is acknowledged that
 14 matters relating to criminal law and procedure are
 15 outside Second Sight's scope of expertise and
 16 accordingly shall not be required to give an opinion in
 17 relation to such matters ..."

18 Would you agree that, in the light of this letter of
 19 appointment, they should not offer expert opinion on
 20 matters of criminal law or procedure?

21 **A.** Well, this letter of appointment is made 1 July 2014 --
 22 **Q.** Yes.
 23 **A.** -- and that was close to the period at which this entire
 24 process broke down. I actually believe that accountants
 25 are pretty well able to deal with legal issues in the

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1 **Q.** Thank you. That can come down.
 2 The Post Office prepared a briefing for responding
 3 to the Second Sight Interim Report of the 8 July 2013.
 4 Can we look at that, please. FUJ00081852. Can we look,
 5 please, on page 9 at the bottom. Under "Spot Review 5",
 6 remember that was mentioned earlier the Rudkin basement
 7 issue:

8 "This Spot Review principally focuses on
 9 an assertion by Michael Rudkin that during a visit to
 10 Fujitsu's site at Bracknell on Tuesday, 19 August 2008,
 11 he observed an individual based in the basement of the
 12 building who demonstrated the ability to access 'live'
 13 branch data and directly adjust transactions on the ...
 14 system.

15 "Given the amount of time that has passed, neither
 16 [the Post Office] nor Fujitsu have any record of
 17 Mr Rudkin attending the Bracknell site.

18 "Post Office and Fujitsu have attempted to establish
 19 the Bracknell visitor logs for the day in question to
 20 verify Mr Rudkin's attendance and his contact on the
 21 day, however these records are not retained for as far
 22 back as 2008.

23 "Fujitsu have additionally made the effort to go
 24 through all email, documents and archived information to
 25 hand but do not have any information for Tuesday,

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1 same way as lawyers are pretty well able to deal with
 2 accountancy issues. I suspect that this letter of
 3 appointment -- I don't know whether Second Sight signed
 4 it or not, I don't know -- I can't remember when I first
 5 saw it. It may have been in relation to giving evidence
 6 in this --

7 **Q.** It is.
 8 **A.** Oh, right, okay. I don't know whether Second Sight
 9 signed it.
 10 **Q.** I think they did.
 11 **A.** They did.
 12 **Q.** You're right, Lord Arbuthnot, that perhaps oddly, at the
 13 beginning of the mediation process, there was no letter
 14 of appointment and the Post Office raised the issue of
 15 a letter of appointment towards the end of the process,
 16 and this was it.
 17 **A.** Oh well, I bet this was draft -- oh okay, right.
 18 **Q.** In any event, as to my earlier question, even accepting
 19 this, would you agree that any accepted limitation by
 20 Second Sight on their ability to offer an opinion on
 21 issues relating to criminal law and procedure should be
 22 a bar to them investigating cases that ended up in
 23 criminal proceedings or a conviction?
 24 **A.** Certainly not, that would be an illogical consequence of
 25 events.

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1 19 August 2008 that would suggest they had visitors to
 2 the site.
 3 "Further review into the Post Office work logs
 4 indicates that there were just three [Post Office] test
 5 managers present on site in Bracknell on 19 August 2008.
 6 None of them have any calendar records relating to
 7 a visit by Mr Rudkin.

8 "It has however been determined that in August 2008
 9 the basement of Fujitsu's building contained a Horizon
 10 test environment that would look very similar to a live
 11 Horizon environment. This environment was not
 12 physically or technologically connected to the live
 13 Horizon environment. It was therefore impossible for
 14 anyone in this room to have adjusted any live
 15 transaction records, though Mr Rudkin may have witnessed
 16 some form of adjustment to the test environment.

17 "This separation of test and live environments is
 18 designed to guarantee the integrity of Horizon data."

19 Arising from the Second Sight Interim Report and the
 20 Post Office's response to it, did you understand it
 21 then, that's July 2013, that the Post Office was denying
 22 that remote access to Horizon accounts was possible?

23 **A.** Yes.
 24 **Q.** Prior to the publication of the interim report, did
 25 Second Sight tell you anything about remote access to

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1 Horizon accounts?

2 **A.** I can't remember exactly when I heard about this very

3 odd business of Michael Rudkin visiting Fujitsu. But

4 I do believe that Second Sight, whether it was Ron

5 Warrington or Ian Henderson, told me that they were

6 trying to get to the bottom of it, that they were trying

7 to find evidence and that, without that evidence of

8 emails or calendar entries or whatever, they would find

9 it difficult to be absolutely definitive in their

10 interim report about there being remote access to

11 Horizon.

12 **Q.** Did Second Sight ever tell you of a conversation that

13 they said they had with Simon Baker of Post Office's IT

14 department on 22 May 2013 where, so say Second Sight,

15 Simon Baker had said that Fujitsu had come clean about

16 its ability remotely to access live data and to make

17 changes to it?

18 **A.** It seems unlikely that they would have told me about

19 that because I'd have gone stomping all over the place

20 if they had, I think. But I can't be absolutely sure.

21 **Q.** I think it follows that they, Second Sight, didn't tell

22 you that Mr Baker had, so said Second Sight, informed

23 Alwen Lyons and Susan Crichton of this --

24 **A.** I don't think they did.

25 **Q.** -- or of a conversation on 22 May, of which a recording

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1 passed on the evidence that Gareth Jenkins had given in

2 a string of cases that had resulted in the conviction

3 and in some cases imprisonment of subpostmasters?

4 **A.** Yes.

5 **Q.** Did you know that, shortly after the publication of the

6 Second Sight Interim Report, that the Post Office was

7 informed that that witness, Mr Jenkins, which it had

8 used to provide evidence in a series of prosecutions,

9 had failed to disclose to the court material which

10 undermined the opinions that he gave?

11 **A.** No.

12 **Q.** That the Post Office was advised that he hadn't complied

13 with his duties to the court?

14 **A.** No.

15 **Q.** That the Post Office was advised that his credibility as

16 an expert witness was fatally undermined?

17 **A.** No.

18 **Q.** And that the Post Office was advised that it, itself,

19 had been in breach of its duties as a prosecutor and

20 that there were, therefore, a number of convicted

21 subpostmasters to whom disclosure should have been given

22 but was not given?

23 **A.** No.

24 **Q.** In all of the conversations that you had with the Post

25 Office at this time, was there any mention of any of

79

1 exists, 2013, where this issue was further discussed?

2 **A.** I don't think they did.

3 **Q.** Aside from those conversations between Second Sight and

4 Post Office personnel, the Inquiry has heard a lot of

5 other evidence in relation to the remote access

6 capabilities of Fujitsu, including evidence from John

7 Simpkins, from Anne Chambers, from written policy

8 documents setting out the extent to which there existed

9 unrestricted and unaudited privileged access, in some

10 parts of Fujitsu, to Horizon data. What would your view

11 have been, had this material been disclosed to you in

12 mid-2013?

13 **A.** It would have been that there had been a large number of

14 miscarriages of justice, that the convictions that had

15 been secured by the Post Office were unsafe and that

16 most, if not all, of the Post Office's convictions of

17 subpostmasters should be re-examined in the forum

18 probably of the Criminal Cases Review Commission.

19 **Q.** You make the point in your witness statement that this,

20 8 July 2013, was the very time at which the Post Office

21 was probably commissioning advice from Simon Clarke,

22 an employed barrister at Cartwright King --

23 **A.** Yes.

24 **Q.** -- about the effect of the Second Sight Report and

25 indeed some other documents and information that he was

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1 those facts and matters?

2 **A.** No.

3 **Q.** Was there any hint that the Post Office was in receipt

4 of any advice or direction which ought to cause them to

5 examine the safety of previous convictions, their duties

6 of disclosure, or the reference of any cases to the

7 CCRC?

8 **A.** Quite the reverse.

9 **Q.** What was the reverse that was being said?

10 **A.** We were being told that the Horizon system continued to

11 be robust, that the convictions were safe, and that

12 there was no remote access.

13 **Q.** Was anything ever hinted at about the matters that I've

14 mentioned in all of the meetings, conversations, letters

15 and email exchanges that you had with everyone at the

16 Post Office, from Alice Perkins and Paula Vennells

17 downwards?

18 **A.** Not once.

19 **Q.** Were there convicted subpostmasters within the JFSA?

20 **A.** There were, yes.

21 **Q.** Were there convicted subpostmasters whom you were

22 pressing the case for?

23 **A.** Yes. Jo Hamilton was one of them.

24 **Q.** When was the first time that you learned that the Post

25 Office had been informed of the facts and matters that

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1 I've mentioned?

2 **A.** I think it was the 18 November 2020, when the Clarke

3 advice came up in the Court of Appeal's hearing to

4 overturn convictions of 39 subpostmasters.

5 **Q.** So seven and a bit years later?

6 **A.** Yes.

7 **Q.** Can we turn to the Mediation Scheme, which is the second

8 part of the Second Sight story --

9 **A.** Yes.

10 **Q.** -- first dealing with the setting up of it. You tell us

11 in paragraph 114 of your witness statement about

12 a meeting concerning the setting up of what became the

13 Mediation Scheme and refers to a minute from the Post

14 Office of that meeting. Can we turn to that, please,

15 POL00099354.

16 So I've rather blithely skipped over what we've just

17 discussed, which was that the Post Office, internally,

18 was being advised about breaches of duty, failures of

19 candour, breaches of its own duty as a prosecutor having

20 an impact or possible impact on the safety of

21 convictions, and none of that was revealed to you?

22 **A.** I did raise this with the Minister, Lord Callanan, on

23 20 November 2020. I was not blithe.

24 **Q.** No. Then, the worm had turned by November 2020?

25 **A.** Yes.

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1 between the MPs and the Post Office took place on

2 27 November 2014, they said, "Well, we don't see why

3 someone like Jo Hamilton should even be included in the

4 Mediation Scheme. She pleaded guilty, so she's

5 stuffed".

6 **Q.** If we just take this document down whilst we discuss

7 that, please.

8 What was your understanding, throughout the

9 Mediation Scheme until that point, as to whether Jo

10 Hamilton was somebody who should be able to benefit from

11 it?

12 **A.** Well, it was perfectly obvious to me that the Post

13 Office and I were agreeing that Jo Hamilton could be

14 included in the Mediation Scheme.

15 **Q.** What would you have done if, at the beginning, which

16 we're about to turn to, they'd said, "No, no, no, people

17 like Jo Hamilton can't be included"?

18 **A.** Well, I wouldn't have agreed to it.

19 **Q.** Why not?

20 **A.** Because I believed from the beginning that Jo Hamilton

21 had not committed the offences for which she had pleaded

22 guilty and so, clearly, there needed to be a proper

23 investigation, preferably with the help of Second Sight

24 but, in any event, with an independent element, into

25 what had gone wrong in her case, and there were lots of

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1 **Q.** Would you expect to have been told something back in

2 July 2013, not necessarily of the detail of the legal

3 advice that the Post Office was being given but about

4 the consequences of it?

5 **A.** Yes, but it's not just that I would expect to have been

6 told something. It would have been essential for the

7 subpostmasters who had been convicted to be told

8 something, because their convictions were potentially

9 unsafe.

10 **Q.** We're going to come in a moment to the setting up of the

11 Mediation Scheme and the operation of the Mediation

12 Scheme. In general terms, what did the Post Office do

13 in relation to that group of people who stood convicted

14 of a criminal offence in the Mediation Scheme?

15 **A.** In general terms they started by saying, yes, everybody

16 can join the Mediation Scheme and we'll try and get to

17 the bottom of their cases, which sounded to me to be

18 very good, "You can apply to the Mediation Scheme, we

19 may need to involve the CCRC or the Criminal Cases

20 Review Commission, but certainly you can apply". That

21 was what they began by saying but then, later on, what

22 they said was "If you've pleaded guilty or if you've

23 been convicted, then you must go to the back of the

24 queue".

25 But in the final meeting at which the bust up

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1 other MPs who were very active and who had constituents

2 in the same position. We wouldn't have agreed to

3 a Mediation Scheme which excluded those who'd pleaded

4 guilty or been found guilty in court.

5 **Q.** Can we turn to the setting up, then, of the scheme and

6 the document we were just looking at, POL00099354. If

7 we can just scan through, this is essentially the

8 meeting which led to the setting up of the Mediation

9 Scheme. You'll see that the people present are Paula

10 Vennells, you, Ron Warmington, Ian Henderson, Susan

11 Crichton, Mark Davies and Alwen Lyons.

12 We'll see that Ms Vennells welcomed everyone to the

13 meeting saying that they wanted to work collaboratively,

14 respond to learnings and put a process in place to move

15 the cases forward.

16 Then if you just scroll through that to yourself

17 and, if we scroll down, please, then over the page,

18 please. Quite a lot of practical and technical detail

19 there. Then carry on, please, scrolling --

20 **A.** Could you stop there?

21 **Q.** Yes.

22 **A.** At the top of the page you see:

23 "It was thought that Gareth Jenkins produced high

24 quality, and he may be able to help the process."

25 That's an interesting point. Sorry, carry on.

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1 Q. Yes, so this is -- I think, you're pointing out that
 2 this is eight days after the Post Office had received
 3 an Advice saying that he was discredited as a witness,
 4 couldn't be used ever in a future prosecution in
 5 a breach of duties to the court.
 6 A. That's what I'm pointing out.
 7 Q. In this minute, is there any suggestion that any class
 8 of people would be excluded from the scheme as
 9 a whole --
 10 A. No.
 11 Q. -- or that they would have restricted rights within
 12 it --
 13 A. No.
 14 Q. -- for example, that their case could not progress to
 15 mediation? Is that reflective of the fact that there
 16 was no such limitation?
 17 A. There was no such limitation.
 18 Q. At this stage, does it follow that you didn't understand
 19 that the Post Office saw any restriction in them
 20 entering or progressing through the scheme?
 21 A. Absolutely.
 22 Q. Can we look, please, at POL00146048. A letter to
 23 Mr Bates of 27 August 2013 from Angela van den Bogerd,
 24 we can see at the foot of the page. Then, if we scroll
 25 up, this a letter to Mr Bates of the JFSA about the

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1 think there's any suggestion in that pack that was sent
 2 alongside this letter of any such inclusion. Was any
 3 information fed to you from any other source at this
 4 time, that a whole class of people would be cut out from
 5 the benefits of the scheme?
 6 A. No.
 7 Q. You tell us in your witness statement -- no need to turn
 8 it up, it's paragraph 120 -- that on the announcement of
 9 the mediation, you did an interview outside Jo
 10 Hamilton's shop --
 11 A. Yes.
 12 Q. -- in South Warnborough?
 13 A. Yes.
 14 Q. The thought that the Post Office might exclude Jo
 15 Hamilton from the scheme didn't cross your mind for
 16 a moment at that time?
 17 A. No, it didn't.
 18 Q. You tell us in your statement that, around this time,
 19 you thought that the people you were dealing with in the
 20 Post Office were dealing with the matter in good
 21 faith --
 22 A. Yes.
 23 Q. -- and intended to work towards a resolution of all of
 24 the outstanding cases?
 25 A. Yes, that's what I thought.

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1 setting up of the scheme. Fourth paragraph:
 2 "In collaboration with [JFSA] and a group of MPs
 3 [led by you], Post Office established an Inquiry into
 4 Horizon. Second Sight was appointed to lead this
 5 Inquiry ..."
 6 The interim report is copied in or a link is given
 7 to it:
 8 "Post Office now wishes to offer a Scheme to
 9 subpostmasters so that individual subpostmasters have
 10 an opportunity to raise their concerns directly with
 11 Post Office. In partnership with subpostmasters, the
 12 JFSA and Second Sight and interested MPs, all sides can
 13 then work towards resolving these concerns.
 14 "[Enclosed is] a pack of documents describing how
 15 the scheme will work."
 16 I'm not going to go through all of those:
 17 "A postmaster not obliged to submit his/her case to
 18 the scheme ... their legal rights will remain ..."
 19 Then a deadline of 18 November 2013.
 20 Any suggestion in that of exclusion of a whole class
 21 of people --
 22 A. No.
 23 Q. -- or that they would have restricted rights?
 24 A. No.
 25 Q. We can look through the pack that was sent but I don't

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1 Q. Knowing what you know now, does that remain your view?
 2 A. No.
 3 Q. Why not?
 4 A. What I know now is that they had commissioned the Clarke
 5 advice.
 6 Q. I'm so sorry, the document can come down from the
 7 screen.
 8 A. Right. They had commissioned the Clarke advice. They
 9 knew that the evidence that had given rise to a number
 10 of prosecutions had led to those prosecutions being
 11 unsafe. They knew there were a large number of bugs in
 12 the system which they had not told MPs about. They were
 13 operating -- I never got to the bottom of Project
 14 Sparrow, but they were operating some sort of behind the
 15 scenes deception process which suggests to me now that
 16 they were stringing MPs along in order to preserve the
 17 robustness of Horizon, the existence of Horizon, and
 18 possibly the existence of the Post Office. That's what
 19 I know now. But I didn't know that at the time.
 20 Q. If we can turn up page 66 of your witness statement,
 21 please. You say:
 22 "I understand that during September 2013 Susan
 23 Crichton left the Post Office. I do not know why she
 24 left, but it may be important, because it was (I now
 25 see, looking back on it) around this time that the Post

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1 Office's approach changed. Their change of attitude may
2 have been because they had been expecting Second Sight
3 (whom Susan Crichton had recommended) to give Horizon
4 a clean bill of health, which Second Sight had not done.
5 The Post Office clearly did not like that."

6 125:

7 "Alternatively or additionally it may have been
8 partly because Susan Crichton's replacement, Chris
9 Aujard, brought a different tone to the Post Office's
10 dealings. I cannot exactly put my finger on it. I felt
11 uncomfortable with him and thought him uncommitted to
12 the process we were going through. I cannot at this
13 remove in time give details of what he said or did or in
14 which meetings to give rise to that feeling, but I do
15 remember thinking that things were somehow different --
16 less open, more combative -- because of him."

17 That can come down. Thank you.

18 You tell us in these paragraphs that the Post Office
19 did not like it that Second Sight had not given them
20 a clean bill of health. How did they make that known to
21 you?

22 A. Well, they portrayed Second Sight's interim report as
23 giving Horizon a clean bill of health when clearly it
24 hadn't, and that led me to think that they didn't like
25 what Second Sight had said about Horizon. But it's

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1 or, at least, information needed to be disclosed to
2 subpostmasters for them to question that issue?

3 A. Yes, I didn't know that.

4 Q. Are you able to point to any particular conversation or
5 communication that led to the impression that the Post
6 Office was becoming less open or more combative?

7 A. I can go through my witness statement to find some, but
8 it was a gradual impression rather than a -- rather than
9 this was the point, although September 2013 seemed to be
10 roughly the break point between when the Post Office was
11 trying to get to the bottom of any issues with Horizon,
12 and believing that there weren't any, and the later
13 period when they were trying to fail to answer Second
14 Sight's questions, or fail to disclose documents to
15 Second Sight, or fail to allow MPs any information about
16 what was going on with their constituents. So this was
17 roughly the break point.

18 Q. At the time did you draw any link between the extent to
19 which that conduct may be because of knowledge that
20 convictions may be unsafe?

21 A. No.

22 Q. In any event, the Mediation Scheme gets set up, and gets
23 up and running.

24 A. Yes.

25 Q. Sir Anthony Hooper is appointed as chairman of the

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1 really looking back on it that I think that they so
2 objected to what Second Sight had said and they
3 obviously later objected it to a great deal more in view
4 of what Second Sight said later.

5 Q. You tell us that Mr Aujard brought a different tone to
6 the Post Office's dealings. You can't put a finger on
7 it but things were less open and more combative because
8 of him? Was that immediately after he took over as
9 General Counsel?

10 A. No, I think it was a gradual impression that arose
11 because the Mediation Scheme gave rise to what I or
12 somebody else described a legal battlefield with him as
13 the sort of general commanding that process. So I think
14 it was gradual, rather than immediate, because I take
15 people as I find them, and I was prepared to give him
16 the benefit of the doubt to start with.

17 Q. Of course, at this time, September 2013, that is only
18 two months or so after the provision of the Simon Clarke
19 advice --

20 A. Yes.

21 Q. -- you didn't know at the time that the Post Office had
22 been told that some of its prosecution evidence was
23 tainted?

24 A. No, I didn't.

25 Q. Therefore, some of its prosecutions may have been unsafe

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1 Mediation Scheme and you deal with the process by which
2 he came to be identified and his appointment in detail
3 in your witness statement, again exhibiting many
4 documents, contemporaneous documents, backing up what
5 you say. Can I just pick out a couple of moments in the
6 narrative, please.

7 A. Yeah.

8 Q. Firstly, you tell us about a meeting you held in your
9 office with the Post Office on 28 January 2014, and
10 there's a Post Office minute of that meeting. It's
11 POL00026743. Can we see who is present: you; Alice
12 Perkins; Paula Vennells; Janet Walker, your Chief of
13 Staff; and David Oliver. Just to refresh your memory,
14 David Oliver was the programme manager for Project
15 Sparrow?

16 Did you know anything about Project Sparrow at the
17 time?

18 A. No, I didn't. I still don't know much, if anything,
19 about it because I haven't been into it, really.

20 Q. I just want to ask you about a specific point that's
21 recorded in these notes of this meeting on 28 January
22 2013. It's on page 3, please. Third paragraph,
23 beginning "AP":

24 "AP said that Post Office should have had a letter
25 of engagement in place with Second Sight from the start

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1 and that this [I should have said that the previous
2 discussion was about getting a letter of engagement out]
3 was now putting that issue right. [You] agreed that
4 there should have been a letter in place. [Paula
5 Vennells] suggested that if Second Sight's nervousness
6 was that Post Office was trying to restrict them from
7 raising issues she could assure [you] that the
8 engagement letter was not designed to restrict in any
9 way Second Sight's ability to investigate issues with
10 Horizon that were raised by applications to the scheme
11 ..."

12 Then there's some more text about the drafting of
13 the letter.

14 Did that kind of communication in the course of the
15 meeting, that there would be no restriction in any way
16 on Second Sight's ability to investigate issues with
17 Horizon that were raised by applicants of the scheme,
18 contribute to your belief that there was no restriction
19 or no restriction was to be introduced on Second Sight's
20 ability to investigate all and any issues with Horizon?

21 **A.** It did, except that she then went on to contradict
22 herself. But yes because, from the start, Second
23 Sight's had been promised access to any documents that
24 they, Second Sight, believed they needed and we, the
25 MPs, had been promised complete openness and

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1 the issues to be mediated?

2 **A.** Yes.

3 **Q.** Was it right that that point, full access and liberty to
4 examine and investigate all issues, were very important
5 to you?

6 **A.** Yes.

7 **Q.** Can we look, just before lunch, please, at POL00100222.

8 This is an email from your Chief of Staff on the
9 minute we've just looked at, ie asking for matters to be
10 included or recorded within them. Having checked over
11 the minute, Ms Walker responds on your behalf by saying:

12 "With regard to the minutes, James thinks they are
13 absolutely fine except for a few differences, which he
14 would like recorded."

15 Then point 2:

16 "[Paula Vennells] confirmed that if problems were
17 found with Horizon, that Second Sight were at liberty to
18 investigate -- in other words, there were no 'no go'
19 areas in the investigations."

20 Firstly, was that said at the meeting?

21 **A.** I believe it probably was and, if I was saying that the
22 minutes should be amended to include that, I think it
23 almost certainly was.

24 **Q.** Secondly, was it a matter of importance to you --

25 **A.** Oh, yes.

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1 transparency.

2 **Q.** This is a point that you make in your witness statement
3 on page 74, if we can turn that up, please. Page 74 at
4 the foot of the page, please.

5 The last three lines:

6 "It seems from the note [that's the note I've just
7 taken you to] that Paula Vennells told me that Second
8 Sight's engagement letter was not designed to restrict
9 in any way Second Sight's ability to investigate issues
10 with Horizon."

11 Then over the page.

12 "This was not the first time she had promised access
13 for Second Sight to any document or file that was
14 relevant their investigations."

15 Did you have, as a result of things that Paula
16 Vennells had said to you, an expectation that there well
17 up full openness and transparency?

18 **A.** Yes.

19 **Q.** From the start of the mediation, did you believe that
20 Second Sight would be given access to investigation
21 files?

22 **A.** Yes.

23 **Q.** Including if those investigation files were the very
24 files which contained data, the analysis of data, and
25 Post Office's views on such data that were relevant to

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1 **Q.** -- to establish that there were no "no-go" areas?

2 **A.** It was certainly a matter of importance, yes.

3 **Q.** Why so?

4 **A.** Because if there had been any no go areas, then the Post
5 Office would be able to hide potential issues of
6 miscarriages of justice.

7 **MR BEER:** Thank you very much, Lord Arbuthnot.

8 Sir, it is 1.00 pm.

9 **SIR WYN WILLIAMS:** Indeed it is. What time do you want to
10 restart, Mr Beer?

11 **MR BEER:** Can we say 1.50, please, sir.

12 **SIR WYN WILLIAMS:** Yes, by all means, that's acceptable to
13 everyone in the hearing room, I take it, including the
14 person who has the arduous job of transcribing.

15 **MR BEER:** Yes, she has just nodded very slightly.

16 **SIR WYN WILLIAMS:** Yes, I'm very sorry but I take it we are
17 under a little pressure of time today, Mr Beer?

18 **MR BEER:** We are, sir. I plan to ask Lord Arbuthnot
19 questions until approximately 2.30 and then to link in
20 with Sir Anthony Hooper, who Mr Blakey is questioning.

21 **SIR WYN WILLIAMS:** Fine. All right. See you at 1.50.

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

23 (1.00 pm)

24 (The Short Adjournment)

25 (1.50 pm)

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1 **MR BEER:** Good afternoon, sir, can you see and hear us?
 2 **SIR WYN WILLIAMS:** Yes, I can. Mr Beer, before we start,
 3 for no more than probably some seconds, Sir Anthony
 4 Hooper was visible to me. I don't know whether he's
 5 visible in the hearing room any more but, regardless of
 6 that, if he wants to listen to what's going on there's
 7 no problem about that, clearly. I just wanted to check
 8 whether you could see him?
 9 **MR BEER:** No, we can't, sir, and sorry to give you a fright.
 10 **SIR WYN WILLIAMS:** No problem. Thank you.
 11 **MR BEER:** Lord Arbuthnot, good afternoon.
 12 **A.** Hello.
 13 **Q.** You deal in paragraph 143 onwards, which is on page 75
 14 of your witness statement, right up until page 89,
 15 paragraph 184, of the events of February to early August
 16 2014, in terms of the Mediation Scheme. Again, what do
 17 you say is all cross-referenced to the contemporaneous
 18 material that you've exhibited and I'm not going to ask
 19 you in detail about that period.
 20 Overall, is it fair to say that the breakdown in the
 21 relationship between the JFSA and MPs on the one hand,
 22 and Post Office on the other, and the Post Office on the
 23 one hand and Second Sight on the other, began to emerge
 24 at that stage?
 25 **A.** Yes, it is.

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1 go through it all, it's over 20 pages in length and it
 2 speaks for itself. Can I just look at one part, please,
 3 page 22. Reading from the bottom, paragraph 22.1, the
 4 report deals with things under headings or themes, and
 5 there are headings of "Training", of "Contract Issues",
 6 and this is dealing here with "Post Office
 7 Investigations", and Second Sight say -- and to be
 8 clear, this is a report that goes to the Post Office,
 9 including to Paula Vennells and the then Chair of the
 10 Post Office, Alice Perkins:
 11 "As a result of our investigations we have
 12 established that Post Office's Investigation Team has,
 13 in many cases, failed to identify the underlying root
 14 cause of shortfalls prior to initiating civil recovery
 15 or criminal proceedings. This includes cases where
 16 applicants brought to the Auditors' or Investigators'
 17 attention their own suspicions as to the underlying root
 18 causes."
 19 Is that one of the paragraphs that you had in mind
 20 when you said that you would have drawn the conclusion,
 21 "Have the actions been taken against subpostmasters
 22 including litigious or prosecutorial, safe?"
 23 **A.** Yes, certainly it is.
 24 **Q.** "Many applicants [it continues] and almost all the
 25 Professional Advisers, assert that there was inadequate

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1 **Q.** Can I turn to the time when Second Sight produced part 2
 2 of its Initial Complaint Review and Mediation Scheme
 3 briefing report, that is the 21 August 2014 and, if it
 4 helps, can we turn up, please, paragraph 166 of your
 5 witness statement, on page 90, on the screen, please.
 6 **A.** Yes.
 7 **Q.** Paragraph 166, about the report of 21 August 2014, you
 8 say:
 9 "The report contains many points that were damning.
 10 Whether at the time I saw it I recognised quite how
 11 damning they were is less clear in my mind. There is no
 12 reference, for example, to the Post Office or Fujitsu
 13 being able to access Horizon remotely, something
 14 I remember being concerned about. But the question 'Is
 15 Horizon fit for purpose', is answered by Second Sight's
 16 conclusion -- no. Uppermost in my own mind was always
 17 the question, have the actions taken against these
 18 subpostmasters, whether disciplinary, litigious or
 19 prosecutory, been fair and are the results safe? The
 20 conclusion I would have drawn from the summary whenever
 21 I did see it was, 'Almost certainly not, and certainly
 22 not in every case'."
 23 Can we look, please, at the report itself.
 24 POL00030160. This is the report that you're talking
 25 about, the Part 2 Second Sight Report. I'm not going to

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1 investigation prior to suspension (without pay);
 2 termination; or civil/criminal action.
 3 "Based on the cases examined so far, Post Office's
 4 Investigators seem to have defaulted to seeking evidence
 5 that would support a charge of false accounting, rather
 6 than carrying out an investigation into the root cause
 7 of any suspected problems. Evidence to support a charge
 8 of false accounting is often easily obtained since, when
 9 confronted during interview with evidence of obviously
 10 over-stated cash figures, the accused person will often
 11 readily admit to falsifying the end of trading period
 12 accounts."
 13 Over the page:
 14 "With the exception of an interview conducted in
 15 accordance with [PACE] we note that the interviewee is
 16 not allowed to be legally represented, although they may
 17 be accompanied by a 'friend', albeit with very limited
 18 powers.
 19 "Interviews will usually be recorded and, when an
 20 admission has been made, this will virtually always
 21 trigger a 'Guilty' plea by the defendant and often
 22 an associated repayment proposal. As a result, Post
 23 Office Investigators seem to have found that recording
 24 admissions of false accounting was the key to achieving
 25 relatively rapid, and (to Post Office) inexpensive,

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1 asset recovery.
 2 "As a consequence of this, Post Office's
 3 Investigators seem to have de-emphasised the importance
 4 of unearthing the true root causes of the 'mysterious
 5 shortfalls' that applicants claimed to have covered.
 6 Even when faced with requests from subpostmasters for
 7 investigative help, this has often been refused.
 8 Regrettably, this refusal to provide investigative
 9 support is in line with the standard contract.
 10 "It is clear from comments made by applicants, that
 11 this is clearly contrary to their expectations and that
 12 they were unaware that, under [part of the contract],
 13 the Post Office Investigation Division does not have
 14 a mandate to provide general investigative support to
 15 subpostmasters.
 16 "Post Office's instructions to (and training of) its
 17 Investigators seems to have disregarded the possibility
 18 that the Horizon system could be in any way relevant to
 19 their investigations. A consequence of this flawed
 20 approach to investigations is that many opportunities
 21 for process improvements have been missed."
 22 Then last page -- sorry, I think that is the last
 23 page. Thank you very much.
 24 Is that included in your description of the report
 25 containing many conclusions that were damning?
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1 you referring to there?
 2 A. Well, particularly Paula Vennells. I can't remember
 3 precisely which meetings I had with Chris Aujard and
 4 Angela van den Bogerd but those were the people with
 5 whom I dealt with most; Alice Perkins to a certain
 6 extent as well.
 7 Q. Can we go to page 92 of your witness statement, please,
 8 paragraph 170. I'm not going to go to the letter
 9 because you summarise it here, that:
 10 "On 5 September 2014 Angela van den Bogerd wrote to
 11 Second Sight asking Second Sight to reconsider their
 12 recommendation that a particular case was suitable for
 13 mediation. The reason she gave boiled down to the fact
 14 that the applicant had pleaded guilty in court to false
 15 accounting and theft, so that there was no basis left
 16 for mediation."
 17 Then keeping on in the same paragraph, you say:
 18 "... if the same logic were applied to all of the
 19 cases where there had been guilty pleas, then the basis
 20 of the mediation scheme would have been fundamentally
 21 changed."
 22 Was this one of the aspects which led, ultimately,
 23 to the breakdown of the Mediation Scheme?
 24 A. Yes.
 25 Q. Paragraph 171. You tell us:
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1 A. Yes. It was an asset recovery process rather than
 2 an application for justice.
 3 Q. You tell us in your witness statement that by this time
 4 you'd come to trust Ron Warmington and Ian Henderson?
 5 A. Yes.
 6 Q. Your feeling about their approach was that they were
 7 straightforward, open, competent and experienced in the
 8 issues with which you were all dealing?
 9 A. Yes.
 10 Q. You had, by this stage, abandoned your initial suspicion
 11 of, at least, Ron Warmington's past friendship with
 12 Susan Crichton?
 13 A. Precisely.
 14 Q. You say in your witness statement:
 15 "At the same time, the Post Office personnel with
 16 whom I was dealing had become defensive, legalistic, and
 17 determined to keep from MPs information about which they
 18 had previously promised to be open. Where there was
 19 a dispute between Second Sight and the Post Office,
 20 I felt more inclined to favour Second Sight's version."
 21 A. Yes.
 22 Q. Sorry, that can come down. Thank you.
 23 Where you say that the Post Office personnel with
 24 whom you were dealing "had become defensive, legalistic,
 25 and determined to keep from MPs information", who were
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1 "It had always been obvious that the Mediation
 2 Scheme would not have been able to alter convictions in
 3 court."
 4 In the question you had asked in Parliament, if we
 5 go over the page, you said:
 6 "We must look after them and try and provide them
 7 with redress, perhaps through the [CCRC]."
 8 A. Yes.
 9 Q. Is it right, therefore, that you saw the Mediation
 10 Scheme not as a means of overturning or even
 11 questioning, by the words used by Second Sight,
 12 convictions themselves but providing an investigatory
 13 platform and uncovering material that might itself lead
 14 to a reference to the CCRC?
 15 A. Quite. It would give rise to further processes
 16 overturning miscarriages of justice.
 17 Q. Thank you. You deal in your witness statement, again
 18 supported by the contemporaneous material with the Post
 19 Office's response to Second Sight's second report. Can
 20 I just pick out some key passages, if I may.
 21 Paragraph 178 on page 95. The long and the short of it
 22 is summarised in paragraph 178: Post Office replied to
 23 the second report and said it was unable to endorse it?
 24 A. Yes.
 25 Q. What did you think, when the Post Office said that it
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1 was unable to endorse the report?

2 **A.** By this stage, I wasn't surprised because of the Post
3 Office's defensiveness, secrecy, legalism and the fact
4 that it seemed to be blocking information to go to
5 Second Sight, and the part 2 report was not kind to the
6 Post Office and the Post Office was going to get even
7 more defensive when it came out.

8 **Q.** You tell us in the second part of paragraph 179, which
9 is on the screen there, that, when you saw the reply,
10 you assumed from its tone that it had been drafted
11 mainly by Chris Aujard, as it struck you as
12 "unconvincing, defensive, offhand and designed to be
13 obstructive"?

14 **A.** Yes.

15 **Q.** Why did you associate this reply with Mr Aujard?

16 **A.** Because I considered him to be unconvincing, defensive,
17 offhand and obstructive.

18 **Q.** This all culminated in a meeting in your office at
19 Portcullis House on 17 November 2014. We can see that
20 from paragraph 198 on page 103. You referred earlier
21 today and to a meeting in which I think you said the MPs
22 "let rip", or some similar expression. Was this the
23 meeting you were referring to?

24 **A.** It is.

25 **Q.** Were there strongly expressed views by MPs at that

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1 acrimony."

2 Does that accurately reflect what happened?

3 **A.** It does, yes.

4 **Q.** Why did you think Angela van den Bogerd and Chris Aujard
5 were seeking to resile on the promises, as you saw it,
6 that had previously been given by Paula Vennells about
7 which issues could be investigated and access to which
8 documents would be given?

9 **A.** I thought at the time that they were worried that Second
10 Sight was actually uncovering something really crucial
11 about Horizon, that they were worried that Second Sight
12 was getting too close to the truth and that, if they
13 allowed Second Sight to go on uncovering these things,
14 it posed an existential threat to the future of Horizon
15 and that that, in turn, posed an existential threat to
16 the future of the Post Office. That's what I think
17 I thought they were doing and I still think that that's
18 what they were doing.

19 **Q.** So it was the conclusions that had been reached in this
20 second Second Sight Report that, in your view, were
21 fundamental to a sea change or a step change in the Post
22 Office's position?

23 **A.** Yes, although they'd begun before the second part of the
24 Second Sight Report came out.

25 **Q.** In paragraph 201 of your statement, which is on

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1 meeting?

2 **A.** Very strongly expressed views.

3 **Q.** To what effect?

4 **A.** To the effect that the MPs essentially broke off
5 relations with the Post Office and said that the Post
6 Office's behaviour had been such that we couldn't trust
7 the Post Office any more and that we weren't prepared to
8 take further part in the Mediation Scheme or
9 negotiations with the Post Office.

10 **Q.** We can see from 199, if we go over the page, please,
11 your memory of the meeting, and you say you felt:
12 "... it was controlled, on the Post Office side, by
13 Angela van den Bogerd and Chris Aujard. They said the
14 Post Office should exclude altogether from the Mediation
15 Scheme people who pleaded guilty -- a different
16 proposition from [an earlier one that had been made of]
17 being put to the back of the queue. [You] asked them
18 how they thought [you] would have supported a scheme
19 which excluded my constituent Jo Hamilton, to which they
20 had no answer."

21 For you, that was the final straw. You say:
22 "Paula Vennells seemed almost cowed by their
23 stronger personalities and said little. I told her she
24 was breaking her word. I sensed, rightly or wrongly,
25 that she felt ashamed. The meeting broke up in

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1 page 106, you say that shortly after that meeting Paula
2 Vennells wrote to you rejecting a proposition that there
3 should be a presumption in favour of Second Sight's
4 recommendation as to who should go forward for
5 mediation.

6 **A.** Yes.

7 **Q.** I think what you'd been suggesting is that, if Second
8 Sight suggested that an individual case should go
9 forward to mediation, then that case should
10 presumptively go forward to mediation?

11 **A.** Yes, well, MPs, when we'd gone in for the Mediation
12 Scheme in the first place, had expected that every case
13 would go forward to mediation, except for one or two
14 outliers, that might obviously have been a subpostmaster
15 trying it on.

16 **Q.** Did you see anything controversial in a proposition
17 that, if an independent investigator recommended that
18 a case should go to mediation, then the case should go
19 to mediation?

20 **A.** Nothing controversial, not least since the independent
21 investigator had been appointed and recommended by the
22 Post Office itself.

23 **Q.** Can we look at the Paula Vennells letter to you,
24 POL00101699. This is her letter to you of 28 November
25 2014. She says:

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1 "Thank you for the meeting in your office on
2 17 November. I am [setting out] the Post Office's
3 position on the proposition put forward ... that there
4 should be a 'general presumption' that Post Office will
5 agree, save in a few (undefined) exceptional cases, to
6 mediate all cases where this is the recommendation of
7 Second Sight, regardless of their merits and specific
8 circumstances.

9 "Having considered the proposition carefully and
10 having discussed it as promised with my Board, I have
11 concluded that I cannot agree to it."

12 You tell us in your witness statement that this gave
13 you a sleepless night or sleepless nights; is that
14 right?

15 A. Well, this is what it seems I told Alice Perkins, yes.
16 But I think the sleepless night came from the breakdown
17 of the whole process.

18 Q. So it wasn't specifically the rejection of this
19 proposal; it was more that you could see that the
20 writing was very clearly on the wall?

21 A. Yes.

22 Q. Can we look at your reply then, please, POL00101700.
23 This is your reply to Paula Vennells of 8 December 2014.
24 It's a long and detailed letter. I only want to look at
25 the conclusions, if I may, on page 3.

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1 to mediation on the ground that the [subpostmasters]
2 pleaded guilty.

3 "You put forward these arguments in secret, and when
4 MPs asked you in July how the mediation [scheme] was
5 going, you pleaded, in the interests of 'the integrity
6 of the Mediation Scheme', confidentiality.

7 Paragraph 18:

8 "Clearly the Post Office is aware of the Limitation
9 Act point set out ... above -- it has enough lawyers.
10 The Post Office could allay any suspicion that this was
11 a factor in the way it has been behaving by agreeing
12 that [it] will not take any time-barred limitation point
13 in resisting legal claims ... will you agree to this?"

14 I think the answer came back no --

15 A. It did.

16 Q. -- from Paula Vennells. You make the point in
17 paragraph 20 that you won't be standing at the next
18 general election and so some of the MPs have agreed that
19 Kevan Jones would take over your role in the group. You
20 say at the end of paragraph 20:

21 "In any event I could not continue negotiating with
22 you because I have lost faith in the Post Office Board's
23 commitment to a fair resolution of this issue. I shall
24 be pursuing the need for justice ... in other ways."

25 I think you made a press release on that day as

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1 A. Yes, I'm sorry it's so long.

2 Q. If we scroll down please under "Conclusions" from
3 paragraph 13 onwards, you begin a series of paragraphs
4 in the same way, "Despite" something:

5 "Despite the fact that Second Sight have identified
6 the issues of investigations and contracts giving rise
7 to concern ... the Post Office response of 22 September
8 stated, among other things, that contracts and Post
9 Office investigations were outside Second Sight's remit.

10 "Despite your agreement that the Mediation Scheme
11 was to be available to all [subpostmasters] whose cases
12 had been identified by Second Sight as giving rise to
13 concern ... in recent months Post Office has been
14 objecting to around 90% of cases going forward to
15 mediation ...

16 "Despite your agreement to fund the engagement of
17 professional advisers to support [subpostmasters] 'in
18 all relevant stages of the process' ... the Post Office
19 is attempting, in the absence of representation by those
20 professional advisers ... to have 90% of cases excluded
21 from mediation."

22 Over the page:

23 "Despite your agreement that those who have pleaded
24 guilty would be able to take advantage of the Mediation
25 Scheme ... the Post Office has objected to cases going

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1 well?

2 A. I think I did.

3 Q. POL00101690, under the heading "MPs lose faith in Post
4 Office Mediation Scheme", you're reported in the second
5 paragraph as saying:

6 "The scheme was set up to help our constituents seek
7 redress and maintain the Post Office's good reputation.
8 It is doing neither. It has ended up mired in legal
9 wrangling, with the Post Office objecting to most of the
10 cases even going into the mediation that the scheme was
11 designed to provide. I can no longer give it my
12 support. I shall now be pursuing justice for
13 subpostmasters in other ways."

14 A. Yes.

15 Q. Did that letter, the conclusions of the letter that you
16 wrote, and that part of the press release that I have
17 read to you, mark the withdrawal on your side of the
18 equation from MPs' engagement with the Post Office and
19 its Mediation Scheme?

20 A. Yes.

21 Q. Can I turn to the termination of the scheme by the Post
22 Office and look at page 137 of your witness statement.
23 You say that:

24 "On 10 March 2015 [you] heard via a Post Office
25 Press Release that the Post Office had sacked Second

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1 Sight and disbanded Sir Anthony Hooper's independent
 2 Working Group. [You] thought there was a strong risk
 3 that the Post Office would try to suppress [the]
 4 Briefing Report [that we have just read], so [you] wrote
 5 a letter to Paula Vennells making a Freedom of
 6 Information [Act] request ..."

7 Is it right that they replied to the Freedom of
 8 Information Act request saying it was exempt from
 9 disclosure but they were voluntarily going to give you
 10 a copy anyway?

11 **A.** Yes.

12 **Q.** Why did you think that the Post Office would try to
 13 suppress the report?

14 **A.** I thought they'd tried to suppress so much else, that
 15 I couldn't trust them to release that.

16 **Q.** Thank you. That can come down.

17 Now, although there was some desultory
 18 correspondence after this, I think the next major event,
 19 and for you personally -- it was a significant one --
 20 was the dissolution of Parliament on 30 March 2015 and
 21 your cessation on that day as an MP?

22 **A.** Yes.

23 **Q.** After that time, is it fair to say that your role in the
 24 investigation of Horizon and the Post Office's conduct
 25 changed?

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1 **Q.** You address, finally, your position on the Board of the
 2 Horizon Compensation Advisory Board --

3 **A.** Yes.

4 **Q.** -- and its efforts to secure redress?

5 **A.** Yes.

6 **Q.** I've galloped through those last topics, which cover
 7 a period of nearly eight years, at some pace.
 8 Lord Arbuthnot, is there anything else that you wish to
 9 say at this point concerning what has been described as
 10 a national scandal?

11 **A.** I think that with the help of this Inquiry, we are
 12 moving belatedly to the right place and so I'd like to
 13 say thank you.

14 **MR BEER:** Sir, from my perspective, they are the only
 15 questions that I have for Lord Arbuthnot. There are no
 16 questions from Core Participants.

17 **SIR WYN WILLIAMS:** Right.

18 Well, first of all, Lord Arbuthnot, I assume that
 19 there may be persons in the room who would like to give
 20 you the same sort of appreciation that I precluded them
 21 from doing yesterday in the case of Mr Bates, so I'm
 22 going to ask them to show similar restraint today but
 23 that does not mean that I cannot thank you profusely for
 24 the efforts you have put in and, in particular, your
 25 support for this Inquiry, because it should be known

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1 **A.** Yes, it is. I was no longer an MP and I was just sort
 2 of getting involved where I could, but that wasn't in
 3 many areas, because of the Group Litigation.

4 **Q.** You were ennobled in October 2015?

5 **A.** Yes.

6 **Q.** I think maybe you're downplaying a little bit your
 7 involvement after that time. You address in the balance
 8 of your witness statement a range of issues that you did
 9 have involvement in, in the eight years since then.

10 **A.** Yes.

11 **Q.** They include -- I'm just going to list them -- the Swift
 12 Review, paragraphs 277 to 279 of your witness statement;
 13 your involvement in and commentary on the Group
 14 Litigation, paragraphs 280 to 308; the emergence of the
 15 Clarke Advice and what you did when the Clarke Advice
 16 did emerge in November 2020, and you told us earlier
 17 that, immediately, you wrote to Lord Callanan, you wrote
 18 to the Speaker and you wrote to the Lord Speaker; and
 19 you give commentary on the governance of Post Office
 20 Limited, governance by the Government, in terms of its
 21 management and oversight of the company that it owns,
 22 and the approach that ought to be taken by Government to
 23 a body which is said to enjoy an arm's length
 24 relationship with the Government?

25 **A.** Yes.

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1 that you were one of the first people to engage with the
 2 non-statutory review, which was not welcomed by many
 3 people but you thought it appropriate to give it what
 4 assistance you could.

5 So throughout my involvement in this process, I have
 6 had nothing but help from you, for which I thank you
 7 very much.

8 **THE WITNESS:** Well, thank you, sir.

9 **MR BEER:** Sir, thank you. That's the end of
 10 Lord Arbuthnot's evidence. We're going to try something
 11 that we haven't done before, which is if I can ask for
 12 one of the ushers to escort Lord Arbuthnot from the room
 13 and switch remotely to Sir Anthony Hooper.

14 **SIR WYN WILLIAMS:** He's not far away, as I understand it.

15 **MR BEER:** I don't know whether that's true or not.

16 **SIR WYN WILLIAMS:** You don't know where he is, in other
 17 words?

18 **MR BEER:** No, partly, because it's all Mr Blake's area of
 19 responsibility.

20 **SIR WYN WILLIAMS:** Right.

21 **MR BEER:** If we can just keep everyone seated in the room
 22 for a moment, there's about a five-minute turnaround to
 23 get the screen installed, but we're doing it this way
 24 because there's no point in taking our extended break
 25 now, having only sat for 35 minutes.

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1 **SIR WYN WILLIAMS:** Sure.
 2 *(Pause in proceedings)*
 3 **MR BLAKE:** Good afternoon, sir, can you see and hear me?
 4 I should have said sir and sir. Thank you, sir.
 5 This afternoon's witness is Sir Anthony Hooper. You
 6 have granted, Sir Anthony permission to appear remotely
 7 from outside of this country.
 8 **SIR WYN WILLIAMS:** Yes, and I facetiously said to Mr Beer
 9 that Sir Anthony was not too far away when, of course,
 10 I meant the opposite, he is quite far away.
 11 **MR BLAKE:** He is, indeed.
 12 **SIR ANTHONY HOOPER (affirmed)**
 13 **Questioned by MR BLAKE**
 14 **MR BLAKE:** Thank you very much, Sir Anthony, you should have
 15 in front of you, on a screen or beside you, a witness
 16 statement --
 17 **A.** I do.
 18 **Q.** -- that has the unique reference number WITN00430100.
 19 That is dated 8 March of this year; is that correct?
 20 **A.** Yes, I have it before me.
 21 **Q.** Thank you very much. Can I ask you to turn to the fifth
 22 page, where there is a statement of truth.
 23 **A.** Yes.
 24 **Q.** Can you confirm that that is your signature?
 25 **A.** Yes.

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1 the whole of my career as a High Court judge and as
 2 a Court of Appeal judge.
 3 **Q.** Thank you. You were a High Court judge before you moved
 4 to the Court of Appeal, hearing both criminal and civil
 5 proceedings; is that correct?
 6 **A.** Yes.
 7 **Q.** Before that, you were a practising barrister?
 8 **A.** Yes.
 9 **Q.** You retired from the bench in 2012 after nearly 20 years
 10 on the bench?
 11 **A.** Yes.
 12 **Q.** Now, amongst other things, you are the Deputy Chairman
 13 of the Ethics Council of Ukraine?
 14 **A.** I am.
 15 **Q.** I am going to begin by looking at a document that
 16 pre-dates your appointment. Can we look at POL00158062,
 17 please. This is an email chain of 6 September 2013 and,
 18 if we scroll down to the bottom of this page, we have
 19 an email exchange between Paula Vennells and the Company
 20 Secretary, Alwen Lyons. We see there in the third
 21 paragraph it says:
 22 "Kay Linnell suggested Anthony Hooper, he does know
 23 and is interested in being considered, although we do
 24 not know how much he would cost."
 25 Do you recall being proposed for the role that you

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1 **Q.** Can you also confirm that that statement is true to the
 2 best of your knowledge and belief?
 3 **A.** Yes. Subject to two small corrections.
 4 **Q.** Thank you very much, shall we make those corrections
 5 now. Where are the corrections in your statement?
 6 **A.** Paragraph 7.
 7 **Q.** Yes.
 8 **A.** In the third line from the bottom, I wrote the figure
 9 25. Since I wrote that statement, I have seen evidence
 10 which suggests that the figure should be 15.
 11 **Q.** Thank you very much.
 12 **A.** In the last sentence I suggest -- I say that I thought
 13 that none of the mediations had been successful. That
 14 is true, that is what I thought, but I have again seen
 15 recently documentary evidence which suggests that some
 16 had been successful. If so, I knew nothing about it.
 17 **Q.** Thank you very much. That statement will be published
 18 on the Inquiry's website in due course and forms part of
 19 the Inquiry's evidence. I am going to ask you some
 20 supplementary questions this afternoon.
 21 You'll be well known to the lawyers in this room as
 22 a former Court of Appeal judge, and you also sat as part
 23 of that role in the Court of Appeal Criminal Division;
 24 is that correct?
 25 **A.** Yes, for seven or eight years. Well, for many -- for

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1 subsequently took up by Kay Linnell of the Justice for
 2 Subpostmasters Alliance?
 3 **A.** Yes.
 4 **Q.** Do you recall how it is that you came to be proposed in
 5 that way?
 6 **A.** I think I remember that Kay Linnell and I were on
 7 a professional body together and I think we discussed
 8 it.
 9 **Q.** Thank you very much. If we scroll up to the top, we
 10 have the response from Paula Vennells. She says:
 11 "Really helpful. From what I have heard about
 12 Hooper -- he sounds a good prospect, [especially] in
 13 view of who nominated him, provided we can be reassured
 14 that he will be even-handed because of that nomination
 15 provenance."
 16 If we could look at the bottom email, please, if we
 17 could scroll down from the bottom of the page to the
 18 next page, we're here in 6 September 2013, over the
 19 page, please. There's one other paragraph that I'd like
 20 to draw to your attention and that's the penultimate
 21 paragraph. Alwen Lyons says to Paula Vennells:
 22 "I know Susan [I think that's Susan Crichton, the
 23 General Counsel] thinks we have made a reasonable start
 24 but that the wrong chair in the eyes of the JFSA or JA
 25 [must be James Arbuthnot] would take us backwards, and

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1 if we are going to transition [Second Sight] out of the
2 equation a chair who is strong and will take a decision
3 based on facts whether it will be in POL's favour or not
4 would be a great asset."

5 Just looking at that paragraph, were you aware, when
6 you started, when you were approached for the position,
7 about the thinking regarding Second Sight and the
8 possibility that they might be transitioned out of the
9 equation.

10 A. Not at all.

11 Q. Would that, in any way, have affected the approach that
12 you took to the role?

13 A. Well, it would have made the whole mediation process
14 undoable, if I can use that word.

15 Q. Why was that?

16 A. Well, they were a central part of the process.

17 Q. Thank you. I'm going to move on to the terms of
18 reference for the Working Group that you chaired. Can
19 we look at POL00022307, please. Thank you. These are
20 the terms of reference for the Working Group. Very
21 briefly, can you just introduced the Working Group to
22 the Inquiry and just tell us what its purpose was?

23 A. Well, the background, of course, was the Second Sight
24 Report and earlier investigations and, if you look not
25 at this document but the other document which emanated

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1 then went to us, and to me, and to the members, but to
2 Second Sight, and Second Sight then prepared what was
3 ultimately to be called a CRR, a case final -- a case
4 report.

5 I can deal with the problems later but that was the
6 scheme and then there would be a decision as to whether
7 to mediate, the Second Sight would give its view as to
8 whether this was suitable for mediation, and then there
9 would be a vote on it. And there were only two members
10 of the scheme, namely the Post Office and the JFSA, in
11 the form of Mr Alan Bates, and so, if the two of them
12 couldn't agree, I had to reach a -- I had the deciding
13 vote, and we can look at that if you wish to do so, the
14 whole problem of the mediation.

15 Q. That's a very helpful introduction and, in light of
16 that, we can skip through the terms of reference quite
17 quickly. We have on our screens at the moment
18 paragraphs 1 and 2 which sets out the scope and the
19 members. If we scroll down the page, please, we have
20 the objectives of the overall scheme.

21 Then, over the page, we have the role of the Working
22 Group. At the bottom we have you named as the
23 independent chair, and then, over the page, please, as
24 you've just said, paragraph 7 sets out the
25 decision-making process where members shall attempt to

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1 from the Post Office they were saying that they believed
2 the Horizon system to be robust, but they were prepared
3 to hear from, through this scheme, from subpostmasters,
4 who took the view that it was not robust. It had
5 serious failings.

6 So it was a scheme designed to see whether or not
7 the complaints from many SPMs about the workings of
8 Horizon were substantiated or not.

9 Q. How would that relate to, for example, mediation?

10 A. Well, I think that was the second part of it, is that
11 I think the Post Office said, at least, that they wished
12 to settle or might wish to settle some of the claims, so
13 having gone through the procedure of the scheme, then
14 there was an opportunity to mediate. I mean, if I can
15 deal with it very, very briefly, we had about 150
16 applications, the applicants completed what was called
17 a case questionnaire. That was looked at by Second
18 Sight to see whether or not it contained sufficient
19 information for an investigation, and that sometimes was
20 sent back. That was often prepared by legal advisors
21 who received some funding for that from the Post Office.

22 If the Second Sight were happy with the case
23 questionnaire, we admitted them into the scheme. That
24 was followed by the Post Office carrying out
25 an investigation and producing a report. That report

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1 agree all decisions unanimously but if a decision can't
2 be reached then it goes to a vote and you had the
3 casting vote in the event of disagreement.

4 There's one paragraph I would like to ask you about
5 in respect of the terms of reference and that's
6 paragraph 2.4, which appears on the first page.

7 It says at 2.4:

8 "In conducting Working Group business, Post Office
9 may act in a manner that promotes its own interests.
10 Likewise, JFSA may act in a manner that promotes the
11 interests of applicants."

12 Are you able to assist us with how you understood
13 that provision?

14 A. I don't think I ever did understand it.

15 Q. Did you understand the process to be an adversarial
16 process, a cooperative process or something else, in
17 theory?

18 A. In theory a cooperative process.

19 Q. So paragraph 2.4 wasn't intended to set up some sort of
20 adversarial process with each side pursuing their own
21 interests?

22 A. No. It may have been explained to me at some stage why
23 it was there, but I have no recollection now why it was
24 there, and reading it, it doesn't make much sense to me.

25 It's pretty obvious that the Post Office are going to

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1 look after its own interests and the JFSA would do
 2 likewise.
 3 **Q.** We looked -- we started today in September 2013, when
 4 your name was first mentioned. These terms of
 5 reference, we'll see, were finalised in March 2014. In
 6 between your appointment and the finalisation of these
 7 terms of reference, what was your initial work? What
 8 did that involve?
 9 **A.** I don't think my work ever changed. I didn't know that
 10 I hadn't -- I had forgotten that these were much later,
 11 but the way I ran the scheme as the Chairman was exactly
 12 as I have described, and we started working as soon as
 13 we got knowing in what, October 2013, November.
 14 **Q.** Thank you very much. I'm going to take you to an email
 15 exchange in January 2014, so relatively early on in the
 16 scheme. Can we look at POL00301427, please. This is
 17 a discussion between lawyers at Cartwright King and Bond
 18 Dickinson can we please start by looking at page 4 -- 4
 19 and over to 5.
 20 It's 16 January 2014. This is a discussion between
 21 Harry Bowyer at Cartwright King and Andrew Parsons at
 22 Bond Dickinson and they're referring to various case
 23 studies. If we scroll down the page we can see the
 24 beginning of the chain actually starts with an email
 25 between Andrew Parsons and Martin Smith. Thank you very
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1 I think I said "Well, look, I'll do my best to see
 2 what -- see if I can give any help in this area", but
 3 I was really outside the terms of reference of the
 4 scheme.
 5 **Q.** Thank you. If we could scroll up, we see a response
 6 from Harry Bowyer and, in respect of a number of cases,
 7 he refers to the potential need for an expert to be
 8 instructed so we see there the case of El Kasaby, and he
 9 says:
 10 "Were this is an English case and I was prosecuting
 11 I would probably be happier with an expert instructed."
 12 If we scroll down, the case of Kaur, he says:
 13 "The only way out is an attack on Horizon for which
 14 we will need to instruct an expert."
 15 Then Darren King, he says:
 16 "Again the obvious way out is an attack on Horizon
 17 and an expert will be necessary."
 18 Thank you. Can we go on to the email before in the
 19 chain, that's on page 3, please. There's a response to
 20 those summaries from Andrew Parsons of Bond Dickinson.
 21 He says, as follows:
 22 "Would it be possible to incorporate these comments
 23 into the case summaries so that this information can be
 24 passed to Tony Hooper? This will probably need a little
 25 rewording/bit more contextual information given that
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1 much.
 2 It seems as though they're preparing case summaries
 3 for you in January 2014. What was the purpose of those
 4 case summaries?
 5 **A.** I think these are quite outside the scheme, if I'm right
 6 in remembering, and please may I remind you that this
 7 happened a long time ago. As I remember, there were
 8 about four cases in which -- which had gone past the
 9 charge stage and were to go to trial, and I obviously
 10 was concerned, not really in my position as a Chairman,
 11 but simply as someone who wanted to make sure that there
 12 were no wrongful convictions. So I think I asked to
 13 look at the case summary and I think I suggested that it
 14 would -- I would hope that these four cases would be
 15 dropped. That's my memory.
 16 **Q.** Thank you very much. Could we scroll up, please. That
 17 is consistent with this email that's currently on
 18 screen, where Andrew Parsons refers to, for example,
 19 four cases where:
 20 "... it would be useful to set out the next steps in
 21 the investigation process and when we expect a summons
 22 to be issued."
 23 **A.** I should add -- I'm sorry to interrupt you -- I should
 24 add that the JFSA was aware of these prosecutions, and
 25 was anxious, wanted to know what was going on, and
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1 Tony is not aware of the issue with the Horizon expert
 2 as yet."
 3 Now that appears to be a reference to the issues
 4 that had been identified relating to Gareth Jenkins and
 5 Mr Clarke's advice of the summer of 2013, which is well
 6 known to this Inquiry, and that advice raised issues
 7 with bugs, errors and defects that hadn't been disclosed
 8 by Mr Jenkins when giving his evidence.
 9 Were you aware at that stage, so January 2014, of
 10 any issue that the Post Office that with their Horizon
 11 expert?
 12 **A.** To the best of my recollection, I was never aware of the
 13 issue around Gareth and it wasn't until I read the
 14 papers sent to me for the purpose of making this witness
 15 statement that I learnt about him and Simon Clarke's
 16 advice, for example.
 17 **Q.** Would you have expected to have been told about that
 18 issue in the role that you had for the Working Group?
 19 **A.** Well, I think if there was going to be total
 20 transparency, I ought to have been told or the Working
 21 Party ought to have been told that they had abandoned
 22 a witness who had given evidence or made statements in
 23 a number of criminal cases and that they had abandoned
 24 him because he stated something that there were no
 25 problems with Horizon, which, as I understand it,
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1 reading the papers, was simply not true. So yes,
 2 I would have liked to have known it. I'm not sure how
 3 much I could have done with it but would like to have
 4 known it.

5 **Q.** If you had been told that on 21 January 2014, how would
 6 it have affected the work that you were undertaking in
 7 the scheme, for example in relation to convicted
 8 individuals, subpostmasters, and the mediation of those
 9 cases?

10 **A.** Yes, it -- I'm sure it would have done. I mean, we did
 11 look at convicted SPMs and, obviously, I suppose it
 12 would have helped me to know that. But it would depend
 13 a bit more on the facts of the individual case.

14 **Q.** Thank you. I'm going to look at some meeting notes.
 15 Can we start with POL00100335, please. This is a note
 16 of a meeting of 24 February 2014 with Paula Vennells and
 17 Chris Aujard of the Post Office. Can you assist us,
 18 paragraph 1 refers to it being an off-the-record
 19 meeting. Do you recall the background to this meeting,
 20 who asked for it and who asked for it to be off the
 21 record?

22 **A.** No.

23 **Q.** Were those kind of meetings with the Post Office
 24 typical, expected, or something else, for meetings to be
 25 one-on-one without, for example, the other members of

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1 Office scandal, came from reading Private Eye, Computer
 2 Weekly and, obviously, following what Lord Arbuthnot --
 3 now Lord Arbuthnot -- and his fellow MPs were saying.
 4 I had very knowledge other than that. So I wasn't in
 5 a position at the outset to say it would be a small
 6 amount or a large amount. But when you look at the
 7 figures involved, the one I mention in my statement,
 8 60,000, it wasn't likely to be a small payment.

9 **Q.** To what extent were costs matters that were raised by
 10 the Post Office in conversations you had with them over
 11 the years, the cost of the scheme?

12 **A.** Well, I -- I'm sure, from time to time, they complained
 13 about the cost of the scheme, but that wasn't the cause
 14 of our problems.

15 **Q.** We started today by looking at that reference to Second
 16 Sight and the possibility of taking them out of the
 17 equation. By the time of this meeting, the 24 February
 18 2014, can you assist us with the relationship between
 19 Second Sight and the Post Office, so far as you saw it?

20 **A.** I don't think it had really -- we're still in 2014. So
 21 I don't think it had really broken down at this stage.
 22 It broke down later. I told you how it worked. So the
 23 Post Office would produce an investigation report, and
 24 then Second Sight became disenchanted and very critical
 25 of those investigating reports and criticised them, and

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1 the --

2 **A.** Oh, no, I made it clear to the Working Group that I was,
 3 from time to time, meeting Paula Vennells.

4 **Q.** Thank you. If we could look at paragraph 2, I'm going
 5 to just read out some of the second half of that
 6 paragraph, it says there:

7 "It was also explained that the cost of the scheme
 8 was currently running at around £5 million, and that
 9 [Second Sight] had estimated the compensation costs
 10 could be up to £50 million. The scheme had therefore
 11 moved a long way from its initial positioning as
 12 something the outcome of which in many cases might be
 13 an apology and/or a small gratuitous payment."

14 What do you recall in relation to the reference
 15 there to the cost of the scheme being far greater than
 16 it had been anticipated?

17 **A.** Well, I think, again, from memory, conversations about
 18 a small gratuitous statement, I think I made it clear
 19 that it wouldn't -- it would be much more than a small
 20 gratuitous payment in some cases.

21 **Q.** Did you understand, when you took on the role, that it
 22 would be something less significant or more significant
 23 than had been anticipated?

24 **A.** Well, I mean, they were very early days when I took on
 25 the role, what I knew about the -- we now -- is the Post

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1 then we would send it back to the Post Office to try to
 2 improve. The other side of the coin was that, when
 3 Second Sight produced its case review report, the Post
 4 Office were very critical of the contents of the report.

5 I also was concerned, in the case of both the Post
 6 Office and the Second Sight Reports, that we weren't
 7 really looking at the loss. I wanted to follow the
 8 money. I wanted to know what was the loss and how could
 9 that loss have occurred. So working, in a sense,
 10 together, the reports gradually improved. But, as the
 11 Post Office became opposed, many of the Second Sight
 12 Reports they thought they were going too far out, they
 13 criticised the Second Sight. I mean, the one that's
 14 referred to in the papers is when Second Sight said
 15 false accounting is a less serious offence than theft,
 16 and that, I see in all the papers, led to all kinds of
 17 lawyers being involved but that's exactly what I'd said
 18 in a meeting.

19 So there were just -- conflicts gradually grew and
 20 grew and grew and grew, until we were finally closed
 21 down in March 2015. So I can't tell you at what stage
 22 it disintegrated it was slow disintegration.

23 **Q.** I'll be taking you through some of the meeting notes to
 24 see that disintegration. If we could start on this
 25 document and look down at paragraph 4, please. The

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1 discussion between yourself and Paula Vennells. You say
 2 there -- it says there that:
 3 "TH [that's yourself] agreed that [Second Sight]
 4 were very resource challenged, and it would be difficult
 5 for them to meet the current timetable."
 6 Can you assist us with the reference to resource
 7 challenges, please?
 8 A. Well, you will know better than I am. Second Sight were
 9 two people and then they brought in I think one,
 10 possibly more, assistants. We had 150 cases coming
 11 through. Two people who would find it very difficult to
 12 turnaround the case review reports as well as doing
 13 their work on the case questionnaires, in the time that
 14 we wanted them to do it.
 15 Q. Was that because there were more cases than anticipated?
 16 Or because Second Sight had been instructed with, for
 17 example, too few individuals assisting them?
 18 A. I can't tell you about the second. I'm sure we had much
 19 more work than was anticipated.
 20 Q. Then --
 21 A. They were a very small company and I praised them for
 22 all the work that they did and obviously I worked
 23 closely with them, but there was no way they could keep
 24 up.
 25 Q. Did the number of cases take you by surprise?
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1 Office, after an examination of their characters, would
 2 be stealing these sums of money.
 3 It didn't make sense, in particular because within
 4 a matter of days of any quote "alleged theft", they had
 5 to balance the books. It just never made sense. I made
 6 that point over and over again.
 7 Q. Can you assist us with how you made that point? Was it
 8 in discussions, one-to-one discussions, in groups?
 9 A. Yes, yes. But it was absolutely obvious.
 10 Q. Who did you communicate that to?
 11 A. Well, Paula Vennells and -- I've forgotten the
 12 Chairman's second name.
 13 Q. Was it Alice Perkins?
 14 A. Yes, that's right. Yeah. But it's why Lord Arbuthnot
 15 and the MPs got involved, because it didn't make sense.
 16 Q. Continuing, sticking with that paragraph:
 17 "Some concern was expressed by [Paula Vennells] and
 18 [Chris Aujard] that [Second Sight] were had not in their
 19 correspondence come across as independent, and may be
 20 unduly influenced by the need to satisfy certain MPs."
 21 Was that a view that was communicated to you?
 22 A. Apparently I -- was I at the meeting?
 23 Q. Yes, this was the meeting with you.
 24 A. Well, they may have been said. I would have refuted it
 25 completely. They were being very independent, they were
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1 A. Not really, in the sense that I just didn't know.
 2 I didn't know how many would come forward.
 3 Q. The paragraph continues:
 4 "That said, [your] view was that Second Sight were
 5 trying to be objective and that they had a difficult
 6 path to tread, in that in order to their job properly
 7 (In [your] view) they would need to express an opinion
 8 on the merits of each claim. In [your] view, this was
 9 something that they found hard to do."
 10 Just pausing there, can you assist us with that,
 11 please?
 12 A. These were very complex and difficult cases that we were
 13 looking at, and that they were looking at and,
 14 throughout the whole of the time of the mediation
 15 scheme, the Post Office were maintaining, over and over
 16 again, that the Horizon system was robust. There was
 17 nothing wrong with it. So when you were producing
 18 a report, when you're looking at an applicant's case,
 19 it's understandable that you would want to say something
 20 about the merits.
 21 As I say in my witness statement, I tried to make it
 22 clear to Paula Vennells and to the Chairman that the
 23 Post Office case didn't make sense, and I felt that
 24 throughout, and no doubt Second Sight did. It didn't
 25 make sense that reputable SPMs appointed by the Post
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1 just coming to conclusions which the Post Office didn't
 2 like.
 3 Q. Thank you. Paragraph 5, various options were discussed,
 4 and it seems as though the Post Office were suggesting
 5 number of different options: one was terminating the
 6 scheme; (ii) restructuring the scheme; (iii) augmenting
 7 Second Sight's resources, (iv) reworking the process in
 8 the scheme, and streamlining it.
 9 Then we move on, it says:
 10 "TH's strong contention was that [the Post Office]
 11 should take no precipitous action until such time as
 12 [Second Sight] had produced, say, five reports, and
 13 until we had seen their thematic report. He noted the
 14 adverse PR consequences of terminating the scheme and
 15 also offered to make himself available to talk to the
 16 Board to explain why he considered this approach
 17 appropriate, should that be necessary or desirable."
 18 Do you recall saying that? Is that a fair
 19 reflection of the words that you spoke?
 20 A. Very much so. Very much so I thought it was ridiculous
 21 to close down the scheme at this stage when we were
 22 still at the very early stages. You can see from that
 23 paragraph, Second Sight hadn't produced as many as five
 24 reports. We were waiting for that. So we're very early
 25 days and to close it down would have been ridiculous.
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1 Q. You are perhaps today more animated than that paragraph
 2 suggests. Is that because the paragraph is downplaying
 3 the words that you spoke, or were you more measured in
 4 your discussions that are expressed?
 5 A. I'm not -- I'm not always very -- I'm not always very
 6 measured.
 7 Q. Do you think, in that meeting, you spoke as forcefully
 8 as you are speaking today?
 9 A. I don't know. I'm prepared to take this strong
 10 contention. That's good enough. I was opposed to
 11 closing the scheme down at that early stage.
 12 Q. We note there that you have offered to talk to the board
 13 to explain. Were you ever taken up on that offer? Was
 14 it ever suggested to you that you could speak to the
 15 board?
 16 A. No, sadly I wasn't. I think, looking back at it all, it
 17 was a shame I didn't say I'd like to speak to the board.
 18 I'd like to give over to the board -- who I knew was
 19 giving Paula Vennells a hard time -- I'd like to get
 20 over to them the fundamental implausibility of the Post
 21 Office case.
 22 Q. You say they were giving Paula Vennells a hard time.
 23 What was your understanding of that?
 24 A. Well, I remember her saying, well, the board were
 25 looking for more, you know, were concerned about the

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1 criminal cases only when [you] made those comments."
 2 What did you have in mind when you made those
 3 comments?
 4 A. Both, both civil and criminal. If someone had been
 5 sued, what was the man who went to the High Court and
 6 was ordered to pay £300,000 of costs to the Post Office?
 7 I can't remember the exact case. But all those who had
 8 lost their livelihood, I didn't think it was the result
 9 was going to depend on some minute reading of
 10 a contract.
 11 Q. Did you make that clear in that meeting or in other
 12 meetings?
 13 A. I made it clear that there would probably have to be
 14 substantial payments. I mean, when one looks at the
 15 newspaper today, we're talking about over 500,000.
 16 Q. Was the advice from Bond Dickinson ever shared with you?
 17 Were you ever told that the Post Office expected to pay
 18 far less?
 19 A. Well, I've just obviously -- I don't remember.
 20 I probably was told that they had not expected to pay
 21 a lot. I was probably told that. I don't think I saw
 22 any Bond Dickinson advice, and I don't know how -- what
 23 they founded that advice on.
 24 Q. I'm going to move to a number of meetings of the Working
 25 Group. Can we start with POL00026656, please. We're

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1 cost, they didn't think it was going anywhere. Their
 2 view, Horizon was robust, there was nothing wrong with
 3 Horizon. These were all -- these cases had no merit.
 4 I'm putting it in very general terms. That was the
 5 feeling I got from her, whether rightly or wrongly.
 6 Q. Were any names mentioned in that regard?
 7 A. If they were, I certainly couldn't remember today.
 8 Q. Moving on to paragraph 7, it says:
 9 "The quantum of compensation payments was
 10 discussed."
 11 I think this is the paragraph that you were
 12 referring to earlier. It says that you noted that the
 13 applicants' questionnaires often painted a very
 14 distressing picture where there had been a loss of
 15 livelihood and other losses. Your view was that should
 16 the evidence show that the Post Office had not acted
 17 properly, then the amount of compensation payable could
 18 be quite material.
 19 It says:
 20 "[Note that] this contradicts the legal advice
 21 obtained by [the Post Office] from [Bond Dickinson]
 22 which categorically states that the maximum loss [the
 23 Post Office] could expect to pay would be limited to 3
 24 months 'pay' under the [subpostmaster's] contract. It
 25 was not entirely clear whether [you] had in mind

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1 now on March 2014.
 2 We see there, if we scroll down, that's when the
 3 terms of reference were agreed. Was it likely that
 4 there were several meetings before this meeting or was
 5 this the first official meeting?
 6 A. I would have thought there must have been meetings
 7 before March. I'd be very surprised if that was the
 8 first meeting.
 9 Q. Can we please turn to page 4, where there is reference
 10 to the Second Sight Report. So you've talked us through
 11 already the process that is involved, where there is
 12 a Post Office investigation report -- first
 13 a questionnaire then a Post Office investigation report,
 14 and then the final report is a Second Sight Report; is
 15 that correct?
 16 A. Yes. Bearing in mind that, as we processed --
 17 progressed, the -- we sent the report back to the Post
 18 Office to deal with the complaints made by Second Sight
 19 and we sensed the Second Sight Reports back to Second
 20 Sight to meet the complaints made by the Post Office.
 21 So it wasn't an easy, smooth process.
 22 Q. It says there:
 23 "The Working Group had agreed, as a temporary
 24 procedure for the first three or four Second Sight
 25 Reports, that it would review the reports alongside the

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1 Post Office investigation reports, to satisfy itself
 2 that the package of information would provide the
 3 mediator with what was necessary for a successful
 4 mediation."
 5 **A.** Yes.
 6 **Q.** Then it refers there to Second Sight Reports, and these
 7 are things that we will see over the course of this
 8 phase of the Inquiry, reference to M numbers. Those are
 9 the reports that are produced by Second Sight, are they?
 10 **A.** Yes.
 11 **Q.** Or the case reference --
 12 **A.** No, M was the number of the applicant.
 13 **Q.** Thank you, and --
 14 **A.** And I should add, I think it is clear somewhere in the
 15 papers, that it was not our task to look at merits.
 16 **Q.** It says there that:
 17 "As a result of a discussion, the Working Group
 18 greet that the Second Sight Reports need to be
 19 revisited", and it sets that out there.
 20 Can you give us your initial impressions of both the
 21 Second Sight Reports and the Post Office investigation
 22 reports as to their qualities?
 23 **A.** I think that's a very hard question. I wanted the
 24 Second Sight Reports, as it says there, in (a), to
 25 really concentrate on the losses and the surplus so that

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1 trying to hurry the process up but, being realistic, we
 2 had to give extensions, both to Post Office and you'll
 3 see also to Second Sight. I don't --
 4 **Q.** Absolutely. If we scroll down we can see comments from
 5 Alan Bates below -- it says "AB", I believe that's Alan
 6 Bates:
 7 "... noted the number of extensions being requested
 8 by Post Office and queried whether that was at odds with
 9 the approach being taken by professional advisers.
 10 [Angela van den Bogerd] is looking into how this process
 11 can be made more efficient, but some cases are taking
 12 longer to investigate due to the complexity of the
 13 issues raised."
 14 What did you recall --
 15 **A.** No, and the next -- sorry, if you could read the next
 16 sentence.
 17 **Q.** It says that you pointed out that the Working Group had
 18 not declined any extension request made by professional
 19 advisers, only required that such requests should be put
 20 to the Working Group to consider before the expiry of
 21 the deadline and, in that regard, the Post Office and
 22 professional advisors are being dealt with in an even
 23 manner. You say that:
 24 "... the Working Group will expect to see progress
 25 with Post Office investigations next week."

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1 the mediation -- the mediator could understand what was
 2 the amount of money involved. So I was stressing that.
 3 In the case of the Post Office reports I'm sure I was
 4 critical of those from time to time, as to not being
 5 clear as to what they were saying. But the Post Office
 6 reports, essentially, was "Nothing wrong with Horizon,
 7 this is either theft or carelessness".
 8 **Q.** Thank you.
 9 **A.** That was all -- I haven't got one in front of me and
 10 haven't looked at one for years but my memory of the
 11 last -- the conclusion was always there's nothing wrong
 12 with Horizon, Horizon robust, this must be either theft
 13 or some form of carelessness. Or ...
 14 **Q.** Can we turn to POL00026643, this is another meeting of
 15 the Working Group. We're now on 13 March 2014. That's,
 16 if you look over -- if we turn over the page it has the
 17 date there. On that page the second page, if we scroll
 18 down we can see the various cases and their status. It
 19 seems as though extensions had been granted in a large
 20 number of cases. And if we scroll, keep on controlling
 21 down --
 22 **A.** Let's just stop there for a moment. So that is M005,
 23 Investigation Report by the Post Office, extension
 24 granted, because they weren't ready to do it, that was
 25 not the first extension. We spent a lot of our time

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1 **A.** So that shows you that we were giving extensions to the
 2 professional advisers who were not keeping to our time
 3 limits, extensions to the Post Office and extensions to
 4 Second Sight.
 5 **Q.** In your view and to your recollection, were they fairly
 6 equal in terms of it was all parties equally seeking
 7 extensions? Did one seek more extensions than the
 8 other? Were you unhappy with one more than the other,
 9 or were they all equally in the same position?
 10 **A.** Well, at this stage, you're dealing with the
 11 investigation reports. As we move through the minutes,
 12 you'll see that the investigation reports were complete
 13 and then we were giving extensions to Second Sight.
 14 I don't think there was any question of favouring one
 15 rather than the other. We were just doing our best, all
 16 of us, to try to get these things complete.
 17 **Q.** Did the complexity take you or others by surprise, the
 18 length of time that was required?
 19 **A.** No, I don't think it did. Some of these cases went back
 20 to 2005/2006. So there was an absence of paperwork
 21 perhaps on both sides, where SPMs had lost paperwork,
 22 obviously, had given up. There was difficulties with
 23 the paperwork in the Post Office. Again, I mean the
 24 criticism, as we all know, is that when the SPMs
 25 originally made their complaints years ago about

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1 their -- this sudden loss that appeared, that that
2 wasn't properly investigated and that's almost certainly
3 right.

4 But the consequence was that when we came to look at
5 it there weren't the documents that one might have
6 expected to be there if they had been properly looked
7 at.

8 **Q.** So was one of the difficulties and one of the delays
9 caused by a failing in the original investigation by the
10 Post Office Investigators, rather than an investigation
11 during this mediation process?

12 **A.** Well, I know that now, because I've read the judgment of
13 Mr Justice Fraser, and I know that there were these
14 PEAKs and KELs available which were not looked at at the
15 time, error logs. I don't know if I knew that during
16 this -- during the Mediation Scheme and, obviously, I've
17 learnt a huge amount following my ending -- ending my
18 chairmanship.

19 **Q.** If we can scroll over to the next page, page 4, there's
20 one entry I'd like to ask you about it says there, the
21 first bullet point:

22 "AH had prepared a note setting out a proposed
23 structure for Second Sight's reports. The [Working
24 Group] discussed the note and agreed it was helpful."

25 So it seems as though you produced a note in order
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1 general framework paper should cover, so clearly his
2 faith in [Second Sight] is waning. Whilst we could
3 capitalise on this Paula is a bit worried [about]
4 forcing this point too much (ie we should let him draw
5 his own conclusions, he might start to rebel if he feels
6 he is being pushed in that direction)."

7 Is that a fair and accurate reflection of your
8 position, do you think they'll --

9 **A.** Not at all. Not at all. I did not think they were
10 substandard. I didn't think they were unsubstantiated.
11 I didn't -- my faith in SS was not waning. I just
12 thought the reports could be written more clearly.

13 **Q.** Do you recall a discussion with Paula Vennells on those
14 issues at all?

15 **A.** There probably was.

16 **Q.** Can you assist us with why you consider it may be that
17 there's a difference in opinion between the two of you
18 regarding that discussion?

19 **A.** I can't help you. I know there's one meeting where
20 I expressed -- I'm recorded as having expressed some
21 concern as the Second Sight going outside the ambit.
22 I don't remember why I said that. I don't remember what
23 led me to say that. But I had faith in Second Sight
24 right until the end. I just wanted them to make reports
25 that were more easily readable for the mediator.

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1 to assist Second Sight with the structure of their
2 reports?

3 **A.** Yes. It's to be helpful because if a -- I was looking
4 at it from the point of view of a mediator. A mediator
5 looking at a report wants to have it in a sort of
6 structured way, so that he or she can understand what
7 the issues are. Second Sight were extremely busy, they
8 were overloaded, and I was doing my bit to try to help
9 to get their reports in a way that would be easily
10 understandable and readable by the mediator.

11 **Q.** Thank you. Can we please look at an email that's
12 UKGI00002221. It's an email from Richard Callard of the
13 Shareholder Executive, dated 25 March. I'm just going
14 to read to you that first bit of that first paragraph,
15 which follows -- it's a read out of a meeting with Paula
16 Vennells, so between Paula Vennells and the Shareholder
17 Executive. It says:

18 "Apparently chair Tony Hooper has sent the Second
19 Sight Reports back to them to be rewritten -- he
20 considered them to be substandard and unsubstantiated
21 ..."

22 Then it says:

23 "... (not sure those were his precise words but the
24 sentiment was certainly there). And Tony Hooper has
25 also decided to give [Second Sight] his idea of what the
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1 **Q.** We saw --

2 **A.** And I wasn't concerned with the merits. Don't forget --
3 I doubt I would have said "unsubstantiated" because
4 I wasn't concerned with the merits; I was concerned with
5 the form.

6 **Q.** We saw at the very beginning of your evidence today that
7 mention to trying to transition Second Sight out of the
8 equation. By this stage, so March 2014, were you aware
9 of the Post Office's intentions towards the continuation
10 of Second Sight?

11 **A.** No, not at all. No, I didn't know that they -- no.
12 I mean, I knew that the Post Office were very unhappy
13 because they didn't like the conclusions that were being
14 drawn.

15 **Q.** Can we please look at UKGI00019286, please, and it's
16 letter of 16 April 2014 from Alan Bates to Jo Swinson,
17 the then Minister for Postal Affairs. He there
18 expresses some concerns about the progress of the
19 Initial Case Review and Mediation Scheme. If we perhaps
20 look at just a few extracts from the third page, we see
21 there it says:

22 "Yet to date, [the Post Office] has not finalised
23 a single case report to the point where it is ready for
24 the [Working Group] to consider its suitability for
25 being sent to Mediation, and realistically that could
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1 still be a considerable time off."

2 To what extent at that stage did you agree with the
3 words that were said there?

4 **A.** I'm assuming that Alan is right when he says they hadn't
5 finalised a single case report at that point but they
6 certainly did in 2014 and 2015, finalise many reports.

7 **Q.** Well, we'll see references in due course to matters
8 speeding up or progress being made but, at this
9 particular stage, so April 2014, so the spring of 2014,
10 did you have concerns about the speed of the Post Office
11 in producing their case reports?

12 **A.** Yes, of course I did. We all did. That's why we gave
13 them time limits, we granted extensions, we listened to
14 their (*unclear*), we put a considerable degree on -- of
15 pressure on the Post Office to finalise their reports,
16 as we were to do later, when we put considerable
17 pressure on Second Sight to finish theirs and, indeed,
18 as we did with the advisers, we put pressure on them to
19 bring the material that we needed.

20 **Q.** If we scroll down, please, to the fourth paragraph, he
21 says there:

22 "To me, and trying to be objective, the main hold up
23 is with [the Post Office]. At the time of writing, not
24 one case report by them has been complete and submitted
25 to Second Sight in a way that Second Sight can complete
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1 be thought that I agreed with Alan in the sense that
2 they were deliberately dragging their feet. That was
3 not the situation. There was too much work.

4 **Q.** Thank you. Can we look at POL00203701, please. This is
5 an email exchange with Second Sight in April and into
6 May of that year. If we start with the final page,
7 please, page 4. You seem there to be mediating between
8 Second Sight and others in the sense that you say
9 halfway through your email there that, as you've said
10 before, if they're dissatisfied with a Post Office
11 report, then they should explain that in their report
12 where they're dissatisfied and leave it to the mediator.
13 Can you assist us there with your concerns?

14 **A.** I think trying to speed things up. The danger was that
15 we'd just go back and forth. Second Sight would
16 criticise the Post Office report, then the Post Office
17 would look at it again and make a change, and then it
18 would come back again, and I think probably what I was
19 trying to do there was move things on by saying, look,
20 if you're not happy with it, explain why you're not
21 happy with it, and then leave it to the mediator.
22 I think I was trying to speed things up. That's,
23 I believe, what I was trying to do.

24 **Q.** If we scroll up we see a lengthy response from Ron
25 Warmington of Second Sight, and he explains, for
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1 its own Case Review Report. As [he] mentioned earlier,
2 [Post Office] first became aware of the details ... from
3 September 2013, but [they] are constantly seeking
4 extension", et cetera.

5 Then, if we scroll down to the penultimate
6 paragraph, he says:

7 "At a recent [Working Group] meeting chaired by
8 [you], 2 case reports that [the Post Office] were
9 preparing for submission to Second Sight, were analysed
10 in order to examine whether the format of the report met
11 the requirements ... During the in-depth discussion and
12 analysis of the data and evidence, it was abundantly
13 clear to me, and I think many others at the table, that
14 if any investigation had taken part at the actual time
15 of the incidents then the outcome would have been very
16 different in certainly one, if not both cases."

17 Was that a view that you shared at that point?

18 **A.** I can't remember about those two cases but it's
19 certainly a view I shared. But I'd like just to go back
20 to what you quote before. I did not feel, do not feel,
21 that the Post Office were dragging their feet in
22 preparing the reports. They were very difficult to
23 prepare. I often talked to Angela van den Bogerd and
24 others about the complexities, I tried to help, to see
25 how we could speed things up, but I would not like it to
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1 example, he gives a couple of different case references
2 on page 2. If we stop there, M054, if we look at the
3 very bottom of this page, he says that in that case --
4 if we scroll down, please, it's the very end of the page
5 now, so if we could scroll down a little more:

6 "This regrettable delay is a direct consequence of
7 [the Post Office] failing to conduct a proper
8 investigation, either at the time, or when preparing its
9 [investigation report]."

10 Then he refers to another one, M127, where the
11 report contains a lot of brand new material and much of
12 it poses new questions:

13 "... some of which, as it happens, we've already put
14 to the applicant, but there may need to be other
15 questions that will need to be answered."

16 Can you give us a sense of the various frustrations
17 on all sides with regards to the scheme and the speed at
18 which things were being actioned?

19 **A.** Yes, of course.

20 **Q.** If we look at the first page, you say to --

21 **A.** I mean, that page is just typical of the debates we were
22 having, and of the complications of trying to sort
23 things out.

24 **Q.** I think if we scroll to the first page you say that
25 you'd like to draw that specific email to the attention
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1 of the Working Group.

2 **A.** Yes, I -- yes, that's right. Didn't I put a copy of the

3 email before the Working Group so that we could discuss

4 it?

5 **Q.** Absolutely and, in fact, I'll take you to the minutes of

6 that Working Group, and that will be the final document

7 I take you to before we take our mid-afternoon break.

8 Can we just look at POL00043627, please. There are

9 a number of matters raised at this particular meeting in

10 May 2014. It begins by discussing the draft part one

11 report that had been tabled by Second Sight.

12 You can see there a number of generic points made by

13 the Post Office, they say:

14 "The starting point for the report did not ring true

15 as a draft was set up as a supporting document for the

16 thematic report and that was not the purpose of the

17 document.

18 "Opinions should be taken out of this document and

19 moved into the Second Sight thematic report."

20 The penultimate one says:

21 "There are sections of analysis and conjecture in

22 the document which need to be moved to the part 2

23 report, where again they will need to be supported by

24 evidence."

25 Can you give us a sense of the strength of the Post

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1 know it wasn't robust.

2 **Q.** We can very quickly look at the second item agenda over

3 the page, which is a case M022. It says there that:

4 "The Chair opened the discussion by inviting the

5 Working Group to comment on the report's style only and

6 not on content."

7 Below that it sets out various concerns that the

8 Post Office raised about that particular case study.

9 They say:

10 "The report was not of satisfactory quality."

11 If we scroll down they say:

12 "Neutral language needs to be used throughout the

13 whole document.

14 "The document needs to clearly balance the evidence

15 used without any counterpoint brought forward -- this is

16 often absent at the moment."

17 If we scroll down over the page, they say:

18 "Scope of the report goes beyond Second Sight's area

19 of expertise (for example commenting on whether a case

20 was suitable for police investigation)."

21 Is this is an example, as you've just said, of

22 a mindset that is -- assumes that there is no problem

23 with the system and, therefore, finds fault in the

24 underlying reports, or is there something else.

25 **A.** No, that's my view. If you take the view that there is

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1 Office's feeling towards that first draft report by

2 Second Sight?

3 **A.** It's accurately reflected there. They were unhappy with

4 it.

5 **Q.** What was your view?

6 **A.** I was an independent chairman, I was not in a position

7 to make an assessment. I was trying to be independent.

8 So I would want to listen to what Second Sight said

9 about it.

10 **Q.** Can you give us an idea of the atmosphere within the

11 meetings themselves by this stage and was there a sense

12 of --

13 **A.** No, I think generally civilised, generally. You know,

14 there was no shouting or arguing. People were making

15 their points. But, you know, we look at all this stuff

16 in great detail but the Post Office would not budge from

17 their position that the Horizon system was robust. If

18 you take that as your starting point, that there is

19 nothing wrong with Horizon, then anything which tends to

20 criticise the way that the Post Office handled

21 a particular case or how -- the evidence supporting

22 a particular applicant's case, it's going to be

23 criticised because it's got to be wrong. Why has it got

24 to be wrong? Because, in the view of the Post Office,

25 there's nothing wrong. The system is robust. We now

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1 nothing wrong with Horizon, then any criticisms of the

2 way that an applicant's case was handled are likely to

3 be not met with favour by the Post Office. What was not

4 happening, as I make clear in my report, as I understand

5 it, there was never an in-depth investigation of

6 Horizon. What we were doing here was looking at

7 individual cases. But because of the age of the cases,

8 sometimes, because of the many complications, you

9 weren't going to find the smoking gun in any individual

10 case. That was the problem throughout.

11 **Q.** Very briefly, just before per we break, if we scroll

12 down, we can see there, as you've said, the

13 correspondence between yourself and Second Sight is

14 referred to there.

15 **A.** Right.

16 **Q.** So that email chain --

17 **A.** It's exactly the other side of the picture.

18 **Q.** Yes. If we scroll down, you also addressed at that

19 meeting page 4, the bottom of page 4, the correspondence

20 between Alan Bates and the Minister, which we've just

21 been looking at as well.

22 The Post Office there seemed to raise a number of

23 concerns about that letter, if we scroll down, they felt

24 that he had broken the confidentiality, factual

25 inaccuracies, et cetera, and then Mr Bates comments on

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1 that below.

2 Second Sight comment below that. It says:

3 "In closing the Chair commented that he felt that
4 Alan had not been fair to Post Office over their
5 investigation reports and he would write to that
6 effect."

7 Can you assist us with that? I mean --

8 **A.** I did. I felt that and I told Alan that I thought that
9 he'd been a little unfair, not about -- we're not
10 talking here about the merits, we're talking about
11 procedure. I thought it was not fair to say that the
12 Post Office were unduly delaying their investigation
13 reports. I felt the Post Office were seeking, insofar
14 as each individual report is concerned, were seeking to
15 deal with it in the time that they needed. So I didn't
16 think Alan had been fair to them and I said that.

17 **Q.** There are --

18 **A.** I was right because, later on, the Second Sight had
19 huge -- we had to grant them numerous extensions
20 because, again, the amount of work that was involved but
21 this is nothing to do with the merits. This is all to
22 do with procedure.

23 **Q.** With regards to procedure, were the various positions
24 quite entrenched by that stage, or were --

25 **A.** Well, I spent my time over the, what, 18 months I was
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1 an entrenched view as to the robustness of Horizon and,
2 by the last day of the scheme, that view had simply
3 remained unchanged.

4 **A.** Absolutely.

5 **SIR WYN WILLIAMS:** Yeah, okay.

6 **MR BLAKE:** Thank you very much, sir.

7 Can we take our mid-afternoon break now and come
8 back at 3.45, please.

9 **SIR WYN WILLIAMS:** Yes, of course, thank you.

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

11 (3.34 pm)

12 (A short break)

13 (3.45 pm)

14 **MR BLAKE:** Sir, can you see and hear me?

15 **THE WITNESS:** I'd like to add something to my last answer in
16 reply to the Chairman's comment.

17 That approach affects everything. So, even if the
18 Post Office were to accept that the investigation could
19 have been done better back in 2006 or '10, when it was
20 done, it made no difference because Horizon was right.
21 So, even if they made the investigation, Horizon was
22 perfect, so it would have made no difference. And that
23 spills over into the criminal cases, which, as we know
24 from the decision of the Court of Appeal Criminal
25 Division, where prosecutors would make it a condition to
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1 chair, trying to resolve these issues as well as

2 I possibly could.

3 **Q.** What did you see as the barriers to resolving those
4 problems or the principal barrier to resolving those
5 problems?

6 **A.** The barrier was that the Post Office would not accept
7 any problems with Horizon, therefore nothing could
8 really happen. I mean we could look at an individual
9 case and say, well, maybe there ought to be some
10 compensation or a mediator could say that but, if you
11 don't accept any problems at all with Horizon, then how
12 can you resolve these individual cases?

13 Now it's not for me to say when Post Office realised
14 that there were, I read lots about it, at what stage
15 they knew what and how much they knew. That's nothing
16 to do with me. All I'm saying is that this Mediation
17 Scheme couldn't ultimately succeed because the Post
18 Office were saying there was no problem with Horizon.
19 And now we know, as I quote in my statement, the
20 admissions, for example, before the Court of Appeal
21 Criminal Division where Mr Altman, now King's Counsel,
22 admitted gross failures in the Horizon system. None of
23 that came out during the Mediation Scheme.

24 **SIR WYN WILLIAMS:** The impression I get, Sir Anthony, is
25 that, on day 1, shall we say, the Post Office had
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1 accepting a plea of false accounting, that there was no
2 criticism of the Post Office? Why? Because the Horizon
3 system was perfect. Thank you.

4 **Q.** Thank you very much. In light of the evidence you have
5 already given this afternoon I'm going to speed through
6 very quickly the rest of the chronology of the Working
7 Group, so we can move on to some small issues of
8 differences in legal opinions.

9 I'm going to start this afternoon by looking at
10 POL -- actually, let's start with UKGI00002385, please.
11 Very briefly look at an email from June 2014. This is
12 an email, internal email in the Shareholder Executive,
13 if we could scroll down. It discusses a board paper a
14 Post Office Board paper. I don't need to take you to
15 that board paper, for those that are keeping a note the
16 reference of the board paper itself is POL00205354.

17 Mr Batten says there:

18 "The paper references 'progress is picking up
19 pace'."

20 That's, I think, the evidence you've previously
21 given, that things sped up as time went on. He says:

22 "For POL [the Post Office] this is a catalyst for
23 change, but it presents a difficulty in terms of
24 handling (ie why is [the Post Office] changing now that
25 progress is finally being made, what are they hiding?)
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1 It also presumably makes it harder to secure
 2 Anthony Hooper's support for change -- particularly, as
 3 he suggests, 18 months is not unreasonable."
 4 Pausing there, were you aware, as at June 2014, of
 5 a plan to change the process or commitment by the Post
 6 Office or the Shareholder Executive to then change the
 7 process?

8 **A.** No, you've shown me a discussion I had with Paula
 9 Vennells in which mention of change was made but
 10 I didn't know that it went any further than
 11 a discussion. I certainly didn't know that any sort of
 12 tentative decisions were being made to make changes.

13 **Q.** Thank you. That continues to say:
 14 "Separately, November 2015 is after the election,
 15 which is enticing to ministers who can point to
 16 an established process between now and the election."
 17 Were you aware of any political dimensions to the
 18 continuation of the scheme?

19 **A.** Certainly not.

20 **Q.** Can we now, please, turn to POL00148863. We're now in
 21 August 2014. POL00148863. Thank you very much.
 22 I believe it should be 8863, POL00148863. Thank you
 23 very much.

24 This is an email from Rodric Williams to you --
 25 a Post Office lawyer to you, and it relates to the final
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1 report setting out the Post Office's position on the
 2 report."

3 It goes over the page to say:

4 "I therefore ask your consent to defer release of
 5 the report until next Thursday's Working Group call so
 6 that this resolution can be discussed and voted upon,
 7 which will provide Post Office with the opportunity to
 8 explain its position and, if appropriate, explore with
 9 the Working Group any potential alternatives."

10 Can you assist us with what you recall of this
 11 issue?

12 **A.** No. I think there's a minute which we can look at,
 13 where this was discussed. But ...

14 **Q.** Would you have seen it as within your remit as chair of
 15 that group to delay Second Sight's part 2 report?

16 **A.** Well, if I'm asked by the Post Office to delay it until
 17 a few days later, the Working Group, of course I would
 18 agree to that.

19 **Q.** I'll take you to a document that you may be referring
 20 to, it's POL00207914. It's an email that refers to what
 21 ultimately happened and it's the second substantive
 22 paragraph. If we can scroll down please, it says:

23 "Sir Anthony Hooper, despite our attempts to delay
 24 the issue of the report until the Working Group had
 25 an opportunity to discuss it (with a view to improving
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1 version of Second Sight's part two report, and he says
 2 there:

3 "Further to my email yesterday, we have now received
 4 the 'final' version of Second Sight's part 2 Report."

5 He says:

6 "The Report still includes matters that are beyond
 7 the scheme's scope", et cetera.

8 So Second Sight had produced a first version which
 9 had then be subject to feedback from the Post Office,
 10 and they have now produced what is said to be the final
 11 version. If we scroll down to the bottom of this page,
 12 please, he says as follows:

13 "I understand that the Working Group's Terms of
 14 Reference provide that where the Working Group cannot
 15 reach a unanimous decision, the Chair may define the
 16 point of disagreement and call a vote. As a unanimous
 17 decision over the report appears unlikely, Post Office
 18 respectfully requests that the Chair call for a vote on
 19 Thursday's call on the following resolution:

20 "1. That the report not be released as currently
 21 drafted;

22 "2. Alternatively, that if the report is to be
 23 released as currently drafted, that the Working Group
 24 notes Post Office will, as a party not a member of the
 25 Working Group, write to each applicant who receives the
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1 it), he decided that the report should be issued to
 2 those applicants and advisers whose cases, in the
 3 opinion of Second Sight are referenced to the content of
 4 the report. Consequently the report was sent to nine
 5 applicants", et cetera.

6 It says there that the Post Office wrote to the
 7 recipients of the report to advise them that the report
 8 was not endorsed by the Post Office.

9 **A.** But was the matter discussed at a Working Group?

10 **Q.** It doesn't seem to be, it's certainly not suggested in
 11 that email. Don't have --

12 **A.** I'm surprised it wasn't discussed at a Working Group
 13 before I took that decision but there it is. I may have
 14 done.

15 **Q.** Is there anything that you recall of that particular
 16 issue?

17 **A.** Well, I obviously recall the issue when I read about it.
 18 It was a very hot topic. But as you can see, I think,
 19 whether we had a vote or not, I simply can't remember.
 20 But I definitely made the decision that is outlined
 21 there.

22 **Q.** Do you recall why you made that decision?

23 **A.** Well, I wasn't to do with the merits. I was concerned
 24 with procedure. I was concerned that Second Sight, they
 25 produced their report, and that report goes out.
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1 Q. Did you have any concerns about the delay of the report
2 or a delay to the report?

3 A. I probably did. But I'd like -- I would obviously like
4 low look at a minute, if there is one, in which this was
5 discussed, and I can't remember.

6 Q. Can we please turn to UKGI00000032. We're moving
7 forward now to March 2015, and the end of --

8 A. The end, yes.

9 Q. -- the Working Group. This is a ministerial submission
10 to Jo Swinson, the then Minister. I'm just going to
11 read to you a few extracts from this submission. If we
12 scroll down, please, to the summary at 2 and 3, it says:

13 "It is becoming increasingly apparent that the
14 scheme is not working in the way it was intended ..."

15 A. Sorry, who is this from?

16 Q. From Laura Thompson, who is, I presume, an official
17 within the department.

18 A. Getting her information from the Post Office?

19 Q. Well, that's --

20 A. I presume. Not for --

21 Q. That's something I will ask you about.

22 A. Yes, all right.

23 Q. If we look at paragraph 2, the summary there that's
24 presented to the Minister, is:

25 "It is becoming increasingly apparent that the
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1 subpostmasters' contracts and [the Post Office's]
2 prosecutions policy, rather than focusing their efforts
3 on the individual cases they were appointed to
4 investigate."

5 If we scroll over the page, there are two more
6 paragraphs I will read, paragraph 4 and paragraph 5.
7 Paragraph 4 says:

8 "From [the Post Office's] point of view, the
9 investigation and Mediation Scheme has demonstrate that
10 there is no evidence of systemic flaws in Horizon and no
11 evidence that any of the convictions are unsafe. Where
12 [the Post Office] may have fallen down in individual
13 cases is on training and support, and they are
14 addressing those issues which have not already been
15 picked up."

16 Paragraph 5:

17 "[The Post Office's] board have agreed that,
18 effective from next week, they will announce that [the
19 Post Office] will adopt a presumption of mediating all
20 non-criminal cases remaining in the scheme (except in
21 some very exceptional circumstances). This will render
22 redundant the role of the Working Group so it will be
23 closed."

24 Looking at what I've just read, is that submission
25 to the Minister accurate or does it accurately reflect
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1 scheme is not working in the way it was intended and is
2 taking too long to progress to mediation for applicants.
3 [The Post Office] report (confidentially) that JFSA are
4 refusing to engage in the Working Group, certain MPs
5 have publicly withdrawn their support ... and both JFSA
6 and the MPs supporting them are increasingly critical of
7 [the Post Office]."

8 A. Can we take that please line by line?

9 Q. Because, of the time, I'd like to read you a few
10 paragraphs and then you can take it --

11 A. As long as you don't think I'm accepting that, what's
12 said there.

13 Q. Absolutely not. In fact, the question I'm going to ask
14 you at the end is the extent to which you accept that
15 it's accurate or not.

16 So perhaps we'll look at a few paragraphs, and then
17 we can revisit this particular page. Paragraph 3 says:

18 "Whilst the delays are due in some part to the
19 complexity of the cases and the depth of the
20 investigations by both [the Post Office] and Second
21 Sight, they also arise from pressure from JFSA, MPs and
22 Second Sight to widen the scope of the scheme given that
23 there has been no 'smoking gun' found to date on
24 Horizon. Second Sight are attempting to explore issues
25 outside their remit (or indeed expertise), such as
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1 the position, so far as you saw it, at that time?

2 A. Could you go back to paragraph 2, please?

3 Q. Absolutely.

4 A. The scheme was working as it was intended. It was
5 taking too long but we were dealing with the problem,
6 putting pressure on both Second Sight and the Post
7 Office to produce the reports that they had to produce.
8 It is not true that JFSA were refusing to engage in the
9 Working Group. What is true is that there was an issue
10 over mediation. The scheme envisaged that Second Sight
11 would produce their report, and then a decision would be
12 made by the Working Group as to whether it was suitable
13 for mediation.

14 I took the view, originally, that, because the Post
15 Office and the JFSA couldn't agree as members, that
16 I would opt for mediation if I thought that there was
17 a reasonable chance that mediation would succeed.

18 Alan Bates and JFSA persuaded me that that was
19 a wrong approach. I looked more carefully at the
20 origins of the scheme and what MPs had been told, and
21 I changed my test to a much wider test.

22 JFSA refused to take part in the discussions that
23 the rules required us to have as to whether or not there
24 should be mediation. So, effectively, they would absent
25 themselves from the room, which put a lot of pressure on
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me because I had to try to work out on my own without any submissions from them as to whether it was appropriate to go to mediation. That, as I recollect, is the only time in which they refused to engage, so it was a pretty minor matter and it was being resolved by me exercising a casting vote, and I think towards the end we were more often than not, I was deciding that it should go to mediation and give my written reasons for doing.

It's true to say, I'm sure, that MPs had publicly withdrawn their support and it's true to say that they were increasingly critical of POL. I accept that.

Paragraph 3, I find that difficult because, if you're looking at an individual case, then it's inevitable that you're going to look slightly wider. But you see there, there has been no smoking gun. So there was nothing that was strong enough to show that, as we now know, that Horizon was not a robust system and had many bugs and errors and allowed Fujitsu even to change things, change the entries. So I have some sympathy for Second Sight for widening it but that was a matter that could be controlled by me if I felt that they were going too far.

Paragraph 4 -- there you are -- "demonstrated ... no evidence of systemic flaws in Horizon". Therefore

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Horizon?

A. Yes. I mean, I think it was, because, if you look at the opening lines of the document, it was: the Post Office believe it's robust and there's nothing wrong with it; the postmasters don't agree; this scheme may help to find out which is right. But if you think of the amount of time it took before Mr Justice Fraser gave his last of his decisions, it's years later, 2019, after weeks of evidence.

Q. I'm going to move on now to some differences in opinion between yourself and the Post Office and their legal advisers. First, I want to deal with some initial observations on the scheme. Can we look at POL00116136. I'm afraid we're going to have to take these rather quickly.

A. Yes, too.

Q. If we look at -- over the page, number 4. Paragraph 4. This is prior to your appointment, so it's a meeting between yourself with Paula Vennells and there's discussion of your various attributes for the role. At (c) it says you suggested quite firmly that it might be more appropriate for cases that have been through the courts to be referred to the Criminal Cases Review Commission rather than go through the Mediation Scheme. Very briefly, what was your view as far as that was

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nothing, all convictions are safe, all of which we know now is to be completely rubbish, and the rest is announcing the closure. I was -- yes, go on.

Q. You say that from what you know now. From what you knew then and the various reports that you had seen, do you think it was fair and accurate to say that the investigation and Mediation Scheme had demonstrated that there is no evidence of systemic flaws in Horizon and no evidence that any of the convictions are unsafe?

A. Well, that's a difficult question. Number 1, the Post Office was saying Horizon -- there is no systemic flaws in Horizon. Therefore, it follows that there is no evidence that any of the convictions are unsafe. That's the Post Office view. It is right to say that we did not find the smoking gun. It was found by Mr Justice Fraser.

It was Mr Justice Fraser that looked at this in huge detail with Alan Bates, of course, being the lead claimant in the case. But it's right to say nothing came out which showed that -- we were looking at individual cases, so it wouldn't have happened. What we now know is that it was only by going right back into original data, error logs, et cetera.

Q. Was it the purpose of your schemes to identify whether there was or wasn't evidence of systemic flaws in

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concerned?

A. Well, I had not been involved in these cases at all. I've told you already what my state of knowledge was, and I thought at that time that probably convictions should go separate way. I changed my mind, we looked at many -- a number of conviction cases. So it's a sort of very first, if you like, view of something before I really got in to understand what was happening, and I didn't stick to that decision, and nor did the Post Office's.

Q. (e):

"In the context of a discussion on the outcomes from the mediation process, he observed that 'sorry was a good word!' -- we should be prepared to apologise to subpostmasters where appropriate."

Did you continue to hold that view?

A. I do. I've always held that view. I've held that view in so many different cases involving particularly governments who will not apologise at an early stage. Instead of saying, "I'm sorry, something went wrong", they continue to fight it out, often at huge cost to everybody.

Q. Can we look at POL00066817, please. It's an email from Martin Smith to Susan Crichton, to the General Counsel Post Office, and it refers to the note we've just looked

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1 at. In the second paragraph it assesses --
2 paragraph 4(c) that we've just been mentioning and he
3 says there:

4 "I do not get the feeling that he [that's you] are
5 suggesting that (all of) the criminal cases should be
6 sent to the CCRC rather than going through the review
7 process which we are presently conducting. I think his
8 suggestion is very much in line with the concerns
9 expressed by Brian Altman QC about the dangers of
10 allowing convicted people into the Mediation Scheme.
11 Brian's view was that convicted people should instead
12 exhaust such rights of appeal that are open to them."

13 Was that the reason that you took that view: that
14 convicted people should exhaust the Court of Appeal --

15 A. I didn't take the view. I changed my view.

16 Q. Was that your initial view though? Was it along the
17 same lines as that expressed by Mr Altman or a different
18 reason?

19 A. My initial view was expressed at a meeting when I hadn't
20 been appointed and knew very little about it.

21 Q. If we look down, please, it then addresses the issue of
22 the apology, and it says there:

23 "Brian expressed a concern that the slightest
24 apology to a convicted person or the payment of
25 compensation could indeed give rise to an appeal. He

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1 that, if someone had been wrongly convicted, that could
2 be dealt with.

3 Q. I'm going to --

4 A. I wasn't worried about all the sort of legalese as to
5 how the Court of Appeal would treat an apology. I'm
6 used to many cases where prosecutors have said, "We do
7 not resist the appeal against conviction", I'm used to
8 that. I've sat on many cases where prosecutors have
9 said, "We don't resist the appeal", and I would give
10 a short judgment explaining why I was -- the prosecutor
11 was right to take that view.

12 Q. I'm going to move on to another difference of opinion.
13 That relates to disclosure in ongoing prosecutions. Can
14 we please look at POL00125071, please. It's the second
15 page, please. It's an email from Andrew Parsons to
16 Martin Smith, copied in to Jarnail Singh, and he says as
17 follows:

18 "Are you generally reviewing these applications to
19 see if they give rise to any disclosable material
20 (I expect so -- but best to double check!)? This point
21 was raised by Tony Hooper at our meeting last Friday.
22 He also thought that it was 'obvious' that as part of
23 its disclosure duties, Post Office should be disclosing
24 anonymised details of each application in prosecutions
25 where Horizon is being questioned. In response, I sat

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1 was concerned that Misra [Seema Misra] would use the
2 Mediation Scheme to obtain some sort of concession to
3 allow her to appeal.

4 "I note from paragraph 4(e) Sir Anthony Hooper
5 observed that "sorry was a good word". If he intends to
6 use it in relation to any convicted person allowed into
7 the Mediation Scheme, the possibility of a successful
8 appeal may well be increased."

9 Can you assist us with your views as to what is
10 written there?

11 A. My view, and by at least the middle of 2014, was there
12 was likely to have been serious miscarriages of justice.
13 My initial view that it was very unlikely that these
14 people had stolen money remained. I wanted people who
15 were probably already left prison, people who had
16 suffered so badly, I wanted everyone to get on, identify
17 the miscarriages of justice by one route or another, get
18 their convictions quashed. That's what I wanted.

19 Q. And did you see any concern with giving an apology that
20 it might give rides to an appeal?

21 A. You'd apologise because I thought it was all wrong and,
22 therefore, there should be an appeal and the conviction
23 should be quashed. I didn't want the delay. We're all
24 aware of the terrible suffering of those who have been
25 convicted. My desire was to try to get things going so

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1 squarely on the fence and said that the applications
2 would be reviewed and proper disclosures made as
3 required."

4 Does that accurately reflect the advice you gave?

5 A. Yes. Let me explain what I was saying there. One of
6 the arguments that the Post Office used in many of their
7 investigating reports as I remember, is that there is
8 nothing wrong with Horizon and, if there was, we'd have
9 had lots of complaints. What I was saying is the very
10 fact that such a significant number of SPMs had raised
11 the issue of the robustness, the accuracy, et cetera, of
12 Horizon, was in itself a -- something that ought to be
13 disclosed. You couldn't keep on saying, "It's robust",
14 whereas there were probably hundreds of people who had
15 accounts of it not being robust. There's subpostmasters
16 saying "I had £2,000 on the screen, it disappeared.
17 I had 2,000, it doubled to 4,000". There were lots of
18 those cases.

19 Now, for the Post Office, that was easy. All they
20 said was "Horizon is robust, those people are wrong".
21 One of them is a trainer, I think, called Latiff(?), as
22 I subsequently learnt. But what I wanted to say was
23 that there were all these complaints. They can't all be
24 absolutely without merit. There must be some problem
25 with Horizon. If that be right, then applicants should

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1 know. That's what I was trying to say.
 2 And then I'm aware that there was lots of talk about
 3 how I was not following the Attorney General's
 4 Guidelines and this and that but, by all means, show
 5 them to me but I was actually trying to get -- make sure
 6 that -- the problem that I always thought was there,
 7 although I retained my independence as a mediator, as
 8 the Chairman, I always thought "Please, let's get on and
 9 solve these cases", because I was very fearful.
 10 We can talk about the whole issue of pleading guilty
 11 to false accounting, if you want me ask me questions
 12 about that and my views on that.
 13 Q. I will very briefly. Let's deal with that second point
 14 there that Second Sight believed they had lots of
 15 information that might be relevant and there's
 16 a discussion there of your advice about them not being
 17 under the Post Office's control for Second Sight --
 18 A. Yes, well, it turned out I was wrong there. Simon
 19 Clarke tells me, I read his -- I didn't read it at the
 20 time but I've read it since -- that POL had a duty to
 21 make enquiries of third parties. All I was interested
 22 in was getting the information out and, if the Second
 23 Sight did it, they'd do it quickly.
 24 Q. Can we please quickly look at POL00407733, and that's
 25 the Simon Clarke comments that you've just been
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1 disclosed.
 2 Q. Was it your view that the way to do that or a way to do
 3 that was by disclosing anonymised case studies that you
 4 had seen that questioned the reliability of Horizon?
 5 A. That's what I thought. Rightly or wrongly, that's what
 6 I thought.
 7 Q. Can we please look at POL00146859.
 8 A. I'm not saying that Simon Clarke is wrong and all the
 9 law stuff, but I was trying to get this thing going.
 10 There was -- we now know that my intuition that there
 11 were serious miscarriages of justice was right. We now
 12 know that. At that time, we didn't know -- but I wanted
 13 to do the best I could so that people would not die or
 14 go bankrupt or whatever it might be, that their
 15 convictions would be looked at. In fact, they weren't
 16 looked at until when, 20 -- I can't remember the date --
 17 '20?
 18 Q. Can we scroll down on this page, please. Again, it is,
 19 as you say, much the same. It's emails. This from
 20 Jarnail Singh from the Post Office and we have another
 21 one communicating what is said to be the advice of Brian
 22 Altman QC, regarding the disclosure obligations. What
 23 do you think caused the difference of approach between
 24 yourself and the Post Office, in respect of disclosure
 25 of information that had been brought to your attention?
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1 referring to.
 2 I mean, is the difference that we see here that
 3 you're giving advice as to what should be done and what
 4 is practical, as opposed to a strict legal position?
 5 A. I just wanted --
 6 Q. If we scroll down, sorry.
 7 A. I feared miscarriages of justice and I wanted everything
 8 to be done so that those people could have their
 9 convictions quashed before they died.
 10 Q. We see there in the second paragraph on the screen that
 11 Mr Clarke disagreed with the generalised approach to
 12 disclosure, and he says:
 13 "The correct position remains that it is the duty of
 14 the prosecutor to consider material in light of the test
 15 for disclosure and to disclose material that meets that
 16 test. The higher courts have long since deprecated the
 17 practice of throwing open the warehouse doors and
 18 closings everything in the prosecutor's possession."
 19 Was your advice to throw out the warehouse doors?
 20 A. No, it was not. That's an excuse used over and over
 21 again.
 22 Q. What is your view, then of the position taken with --
 23 A. The position is quite clear that things that could
 24 assist a convicted defendant to show that his conviction
 25 was wrong, or the conviction was unsafe, must be
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1 Why do you think the positions are so different?
 2 A. All I can say -- I don't think I can answer that
 3 question. Simon Clarke working for -- he was counsel.
 4 Brian Altman advising the Post Office. I don't think
 5 they saw things in the way that I did but that's their
 6 right.
 7 Q. What was the difference between you, then, in that
 8 approach?
 9 A. Well, I never saw these advices. I never saw Simon
 10 Clarke's advice. I never saw Brian Altman's advice.
 11 I've now read it and I doubt he would be saying what he
 12 says in those advices in the light of his later
 13 concessions before the Court of Appeal Criminal
 14 Division. But then everything seemed all right. There
 15 was nothing wrong with Horizon. There'd been no
 16 prosecutorial misbehaviour.
 17 Now we know that's all wrong. We know there was
 18 serious, serious faults with Horizon, and we know there
 19 was prosecutorial misbehaviour.
 20 Q. Did you expect the Post Office to be taking advice from
 21 external lawyers about points that you had made that
 22 we've been looking at?
 23 A. That's up to them.
 24 Q. I'm going to move on to 2014 and 2015, and this is the
 25 very final piece of advice, and different advice --
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1 **A.** False accounting and theft.
2 **Q.** Absolutely. That's POL00006368, please. In fact
3 there's one before false accounting and theft, and
4 that's the approach to mediation, and that's what we're
5 looking at. So two final points. One is the approach
6 to mediation and the second is the difference between
7 false accounting and --
8 **A.** Let's do the second one first.
9 **Q.** Okay. In that case, can I take you to POL00125777.
10 **A.** I mean, I can do it very simply. Second Sight said in
11 the report there's a difference between false accounting
12 and theft. They no doubt said it because I'd discussed
13 it with them and said. And then there's a great
14 advice -- huge, lengthy advices, as to whether that is
15 right or wrong. But we know it's right. If somebody is
16 charged with theft of 10,000 and he pleads not guilty to
17 theft and pleads guilty to false accounting, it is
18 a completely different offence, much less serious,
19 because the cause of the loss was not due to the SPM
20 stealing it. It must be due to some other clerical
21 error or something. SPMs would say it was down to
22 Horizon, but some of them weren't allowed to say that as
23 a condition of their plea, as we now know.
24 So, in real terms, anyone who has practised criminal
25 law knows that, if I'm charged with theft of 10,000 and
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1 to theft. If I plead guilty to theft and I'm in
2 an employee position, I'm in a breach of trust and the
3 sentencing guidelines almost certainly mean that I'm
4 going to have to go to prison.
5 If I plead to false accounting and say, "Really,
6 I covered it up because I thought it would all get right
7 later. I shouldn't have covered it up, I'm sorry I did
8 that", that's something which the judge is going to look
9 on as huge -- as mitigation.
10 So we can do all the advice and have pages on it
11 but, in real life, guilty to false accounting is
12 a sensible way for someone, whether he's innocent or
13 not, to get out of the situation.
14 **Q.** Can we look at page 3 of this advice, which quotes the
15 words that were set out in a letter to Second Sight on
16 this issue. The Post Office wrote to Second Sight and
17 said:
18 "The suggestion that the offence of false accounting
19 is a less serious offence to that of theft is incorrect.
20 Both offences are equal in law: both are offences of
21 dishonesty and both carry the same maximum sentence ..."
22 You have that letter. You have this advice. In
23 your view, what went wrong at the Post Office end to
24 have such a fundamentally different position to the one
25 that you've just explained to the Inquiry today?
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1 offered a plea to false accounting, I'll accept it,
2 because I'm going to go to prison for theft, and I'm not
3 going to go to prison for false -- normally.
4 Of course, if he's charged with false accounting of
5 500,000, that's a different matter. But on the facts of
6 these kinds of cases, a loss of 20,000, "Plead guilty to
7 false accounting, we'll drop the theft".
8 **Q.** Can we please look at POL00006366, and I had planned to
9 take you through various passages of this advice but
10 you've read the full advice, I think you've read it
11 quite recently.
12 **A.** Yes.
13 **Q.** This is the advice from Mr Altman on precisely that
14 issue.
15 **A.** It's a --
16 **Q.** Can you assist us with why you consider that it isn't
17 put in those stark terms that you've just given to the
18 Inquiry, in this advice?
19 **A.** Of course it's right. It's the same -- the penalty is
20 the same, seven years. You can look at sentencing
21 guidelines. You can read your -- but I practised
22 criminal law for 20 years, in the Crown Courts, in the
23 Magistrates Courts, and I know that a plea of guilty to
24 false accounting is normally going to lead to
25 a completely different sentence than if I plead guilty
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1 **A.** It's theoretical. It's not the real world and, if you
2 look at the real world, the real world is well described
3 in Jane McLeod's letter. You have a loss of money, you
4 have a false accounting, therefore you charge theft.
5 That's what she said in one of her letters. And people,
6 whether guilty or not, are likely to plead to false
7 accounting, they don't want to go to prison and, of
8 course, there was often a requirement to disgorge the
9 money, so it was a very simple and easy way of getting
10 your money back.
11 **Q.** The Chair --
12 **A.** We now know all those convictions are, by and large,
13 unsafe.
14 **Q.** The Chair has to make recommendations in due course and
15 there are those watching this Inquiry who are interested
16 in matters of legal ethics, et cetera. Why do you think
17 it is that a lawyer advising the Post Office doesn't say
18 exactly what you've said today, on the difference?
19 **A.** I don't think that's a fair -- I don't think I can
20 answer that question. I'll leave it to the Chairman.
21 **SIR WYN WILLIAMS:** Well, that's fine and I'm not going to
22 hide this. No doubt we'll hear from Mr Altman about his
23 real-life experience but I too have practised in Crown
24 Courts for many years and sat as a judge for many years,
25 and my real-life experience is exactly the same as
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1 Sir Anthony Hooper's.
 2 **MR BLAKE:** Thank you.
 3 I'm going to ask the very final questions now.
 4 I don't think I need to ask the difference of opinion in
 5 relation to the mediation of cases; that's set out in
 6 the documents.
 7 A question that's been raised by Core Participants,
 8 it relates to the retention of materials from your
 9 Working Group. Are you aware of any discussions with
 10 the Post Office about their retention of any
 11 documentation relating to the work that was being
 12 carried out?
 13 **A.** It might have been discussed. I certainly wouldn't
 14 remember today.
 15 **Q.** One thing that you --
 16 **A.** I would hope that they retained all the documents.
 17 That's what I would hope.
 18 **Q.** One of the matters that you've raised today is about
 19 following the money, and that was one of the core issues
 20 or approaches that you wanted to take. Were there
 21 issues with the production of accounts, for example,
 22 showing losses?
 23 **A.** I mean, there's the one about suspense accounts.
 24 I couldn't understand where the money had gone. If
 25 a subpostmaster found a loss of 2,000 and paid it out of
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1 Sir Anthony, it has been a whistlestop tour this
 2 afternoon. We have had, unfortunately, rather limited
 3 time but is there anything that you would like to add
 4 that we haven't addressed today?
 5 **A.** I don't know. It's the greatest scandal that I have
 6 ever seen in the criminal justice process. We've had
 7 many miscarriages of justice but nowhere as many as
 8 these. We need to re-evaluate how we approach criminal
 9 cases of this kind. Something went very, very wrong,
 10 and I don't envy the chairman's task in trying to find
 11 out how it all started. Something went very, very
 12 wrong.
 13 I think, in part, it's a much wider question and
 14 that is the obligation of a prosecutor. Because all
 15 that a prosecutor has to establish, in deciding whether
 16 to indict someone, apart from the public -- the good
 17 public -- test, is whether there is enough evidence to
 18 support a conviction. That is a very low threshold. It
 19 means that defence have to do a large amount of work to
 20 see whether there is some alternative to guilty.
 21 And with the decline in legal aid, with senior
 22 Members of the Bar who, in my day, practised -- the
 23 Criminal Bar -- and did so on legal aid, that's all gone
 24 now, or largely gone. I am very worried about the way
 25 in which we approach our criminal justice trials.
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1 his own pocket or her own pocket, which they did, or it
 2 was taken off future income, where had the money gone?
 3 And so I asked, started asking, towards the end of 2014,
 4 for suspense accounts because I thought that -- I knew
 5 that there were suspense accounts. I knew that
 6 profit -- Post Office, after three years, took out the
 7 profits of the suspense accounts and I wanted to know
 8 more about it.
 9 I got absolutely nowhere and nor did Second Sight.
 10 They repeated it again in 2016. So just because I'm
 11 interested, I read Mr Justice Fraser's decision, insofar
 12 as it related to suspense accounts, and he said that
 13 when it got to the civil proceedings, the Post Office
 14 pleaded that they didn't understand what suspense
 15 accounts were about, an approach which Mr Justice
 16 Fraser, in my view rightly, said -- disapproved of. So
 17 there's just one example. Where had the money gone?
 18 **Q.** Who is it that you had been asking, with regards to
 19 suspense accounts, as an example? You say --
 20 **A.** The Working Group -- you'll see it in the minutes, you
 21 can find it in the minutes, two or three cases where
 22 I said "What's happened?", and I was told it would take
 23 too long or they hadn't got it, or anything. It's just
 24 one example.
 25 **MR BLAKE:** Thank you very much.
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1 That's a much bigger question than perhaps needs to be
 2 resolved here.
 3 But, underlying all of this are the two -- the major
 4 defect of miscarriage of justice in the common law
 5 across the world, United States, Britain, is
 6 non-disclosure, over and over again. I don't know how
 7 many trials I did in the Court of Appeal Criminal
 8 Division relating to serious non-disclosure.
 9 Secondly, this notion that all that has to be shown
 10 by the prosecutor is a sufficient evidence upon which
 11 a jury could convict. Very much.
 12 **MR BLAKE:** Thank you very much.
 13 Sir, do you have any questions before we finish for
 14 the day?
 15 **SIR WYN WILLIAMS:** Thank you very much.
 16 Are there any questions from Core Participants?
 17 **MR BLAKE:** No, I don't believe so.
 18 **SIR WYN WILLIAMS:** Well, then, thank you very much,
 19 Sir Anthony, for making the time to write a witness
 20 statement and to appear to give evidence. I'm very
 21 grateful to you.
 22 **THE WITNESS:** Thank you, Mr Chairman.
 23 **SIR WYN WILLIAMS:** We will reconvene at 10.00 tomorrow
 24 morning, yes, Mr Blake?
 25 **MR BLAKE:** We will. Thank you very much, sir.
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1 SIR WYN WILLIAMS: Thank you.
2 (4.31 pm)
3 (The hearing adjourned until 10.00 am the following day)
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