

Friday, 12 April 2024

1
2 (9.30 am)
3 **MR STEVENS:** Good morning, sir, can you see and hear me?
4 **SIR WYN WILLIAMS:** Yes, thank you very much.
5 **MR STEVENS:** We're to hear from Mr Cook this morning, sir.
6 **SIR WYN WILLIAMS:** Yes, before Mr Cook is sworn, can I thank
7 him for agreeing to appear at 9.30 at very short notice.
8 It's of help to the Inquiry, Mr Cook, so thank you very
9 much.
10 **THE WITNESS:** You're more than welcome. Thank you, sir.
11 **ALAN RONALD COOK (affirmed)**
12 **Questioned by MR STEVENS**
13 **Q.** Mr Cook, my name is Sam Stevens and I ask questions on
14 behalf of the Inquiry. Could I ask you to state your
15 full name please?
16 **A.** Alan Ronald Cook.
17 **Q.** Thank you for giving evidence to the Inquiry today. In
18 front of you there should be a witness statement --
19 **A.** Yes.
20 **Q.** -- that runs to 106 paragraphs. Do you have that in
21 front of you?
22 **A.** I do.
23 **Q.** For the record, the document reference number is
24 WITN00190100. Before I ask you to turn to your
25 signature, could we please turn to paragraph 89, which

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1 **Q.** But you've since received further documents that show
2 that there were further letters sent?
3 **A.** Correct, correct.
4 **Q.** Subject to well -- no, before we do that, can I ask you,
5 please, to turn to page 36.
6 **A.** Yes.
7 **Q.** Is that your signature?
8 **A.** It is.
9 **Q.** Are the facts stated in that witness statement true to
10 the best of your knowledge and belief.
11 **A.** They are.
12 **Q.** Thank you. That stands as your evidence in the Inquiry,
13 and I'm going to can you some questions about it.
14 Very briefly, in terms of your background, you were
15 appointed as a Non-Executive Director of Post Office
16 Limited on 23 February 2005?
17 **A.** Mm-hm.
18 **Q.** You nodded yes.
19 **A.** Yes, sorry.
20 **Q.** In your statement, you describe having a long and varied
21 career in public and private sectors -- another nod?
22 **A.** Yes, indeed.
23 **Q.** You were Chief Executive Officer of National Savings and
24 Investments from September 2002?
25 **A.** Correct.

3

1 is on page 30 of the statement.
2 **A.** Yes.
3 **Q.** I understand there's a point of clarification you wish
4 to make in respect of that paragraph?
5 **A.** There is, indeed, but I wonder, Mr Smith (*sic*), before
6 we get started, I'd like to put on record most strongly
7 my personal apology and sympathies with all
8 subpostmasters, their families, and those affected by
9 this. As we get into the conversation, obviously there
10 will be an opportunity for me to elaborate but it just
11 felt to me that was an important thing for me to say
12 upfront.
13 In terms of paragraph 89, it cites a couple of
14 letters that I had received from MPs, which was correct
15 at the time, or I believed to be correct at the time
16 I wrote this, but since the document was submitted, some
17 further documents have been released by the Inquiry
18 which show that there were three more cases. So that --
19 it was correct at the time and I'm just seeking to
20 clarify that, you know, that there's nothing wrong with
21 the statement as it stood then but there have been three
22 cases identified since.
23 **Q.** So at the time you signed the statement you believed
24 paragraph 89 to be true?
25 **A.** Correct.

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1 **Q.** Now, you held that role whilst you were a Non-Executive
2 Director of Post Office Limited; is that right?
3 **A.** Correct.
4 **Q.** But in March 2006, you were appointed as Managing
5 Director of Post Office Limited?
6 **A.** Correct.
7 **Q.** At that point, you stepped down from National Savings
8 and Investment Bank?
9 **A.** Correct.
10 **Q.** We don't need to turn it up but in your witness
11 statement you refer to the role of Non-Executive
12 Director and you say that you had a duty to challenge
13 management on any aspect of the business and their
14 proposed approach to both the running of the business
15 and the direction in which Post Office Limited was being
16 taken; and you still agree with that?
17 **A.** I do.
18 **Q.** In order to carry out that duty effectively, you would
19 need to know, broadly, what the Post Office's operations
20 were, wouldn't you?
21 **A.** Correct.
22 **Q.** How were you introduced or inducted to the business when
23 you became a Non-Executive Director?
24 **A.** So, as I have explained in my statement, I had quite
25 a bit of dealings with Post Office to becoming

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1 a Non-Executive Director because the Post Office was the
2 primary distribution channel for the National Savings
3 and Investments products, so that's how I got to know
4 some of the people at the Post Office. However, it's
5 a different order of magnitude if you become a board
6 member. So they've set up a programme for me, going
7 around visiting a number of branches, visiting heads of
8 different functions inside the building, and so that
9 it -- I mean, it lasted for several months, to be
10 honest, on and off.

11 Obviously, this was not a full-time role, because
12 I had a full-time role with National Savings, who were
13 happy to allow me to do this but -- so it was
14 a reasonably comprehensive induction.

15 **Q.** Do you remember getting any talks or induction sessions
16 from the Legal Department at Post Office Limited?

17 **A.** I can't remember, I can't remember a particular event or
18 a particular person that I saw. I would probably have
19 been updated by that area from the Finance Director,
20 Peter Corbett, would be my recollection.

21 **Q.** When you sat as a Non-Executive Director, did you apply
22 or take into account any codes relevant to corporate
23 governance and management?

24 **A.** This is the first time I had been a Non-Executive
25 Director; I had been on boards that had Non-Executive

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1 feature. So there were more people in the room that
2 were independent than were employed.

3 This -- the Post Office Board was the other way
4 round. So the -- it was primarily the senior management
5 team, Sir Mike Hodgkinson, who you saw yesterday, who
6 was the Chairman, was a non-executive. There was Brian
7 Goggin, who was the Chief Exec of Bank of Ireland, and
8 then myself. So both of us, both of the two independent
9 directors, had also business relationships with the Post
10 Office, if you see what I mean.

11 **Q.** What you refer to it as being outnumbered and it being
12 the other way around on Post Office Limited Board --

13 **A.** Yeah.

14 **Q.** -- to what extent did that affect the adequacy of the
15 corporate governance or oversight?

16 **A.** I think corporate governance is better performed if the
17 non-executives are greater in number than the
18 executives, if you see what I mean. That doesn't mean
19 to say it's no good but I think it would be of a higher
20 standard with more independents on the board.

21 **Q.** Why weren't there more independents on Post Office
22 Limited Board?

23 **A.** Not known to me. What I would say is that that Board
24 was a subsidiary to the Royal Mail Holdings Board where,
25 yes, indeed, the independents were in the majority. So,

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1 Directors on them. The corporate governance code --
2 I've gone on in later life to spend a lot of time
3 working on boards, so I would confess much more expert
4 now than I was then. But, certainly, I was well aware
5 of my overall responsibilities in terms of challenging
6 management. I was aware that I was not the decision
7 maker and that I had to contribute to the conversation
8 and, you know, express reservations, if I felt so
9 inclined, or supportive comments, if it felt to be the
10 right thing to do.

11 **Q.** Just to clarify your evidence, when you were
12 Non-Executive Director do you think you would have
13 applied the Financial Reporting Council Corporate Code
14 or not?

15 **A.** Oh, yes, yes.

16 **Q.** In your view, were your expectations for the standards
17 of corporate governance in a publicly owned company like
18 Post Office Limited different to your expectations for
19 a publicly listed company?

20 **A.** Well, they were -- it is different. It was different.
21 I had a board at National Savings and Investments, which
22 I sat on as the Chief Executive, rather than
23 a Non-Executive Director. But, on that National Savings
24 and Investments board, I was outnumbered by the
25 non-executives, deliberately, that would be a typical

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1 you know, I think, technically, if you looked at it, it
2 was okay because the Royal Mail parent had that
3 independence.

4 **Q.** To what extent were you involved with the Royal Mail
5 business whilst you were a Non-Executive Director?

6 **A.** Very little, really. Well, I would go -- as part of my
7 induction, I might have gone to the some of the
8 functions that sat in Royal Mail working for the Post
9 Office, for example, but in terms of the business
10 activities of Royal Mail, then I didn't get very
11 involved in that at all.

12 **Q.** Looking at responsibilities, would you agree that the
13 Post Office Limited Board was responsible for oversight
14 of the operations of the Post Office business?

15 **A.** Correct, yes.

16 **Q.** Do you agree with this: that the identification,
17 analysis and management of risk is very important to
18 running a company?

19 **A.** Indeed.

20 **Q.** Do you accept that Post Office Limited or the Board of
21 Post Office Limited was responsible for overseeing how
22 the Executive Team identified, analysed and managed
23 risk?

24 **A.** Correct, yes.

25 **Q.** Let's go to your appointment as Managing Director, March

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1 2006, and please could we bring up the witness statement
2 at page 16, paragraph 46. You set out the background to
3 you becoming or being appointed as Managing Director and
4 you say at the bottom half:

5 "I therefore accepted the role of Managing Director
6 with the understanding that I would have full
7 accountability and responsibility for the Post Office
8 Limited business but that I would be dependent on Royal
9 Mail Group for delivery or oversight of certain
10 functions. For example, HR, legal, finance and IT."

11 Are you effectively saying you have ultimate
12 executive accountability for the operations of the Post
13 Office Limited company but you're not responsible for
14 the services provided by Royal Mail Group?

15 A. I have accountability, yes, but the responsibility
16 wasn't direct.

17 Q. What do you mean by that?

18 A. The people that were doing that work did not work for me
19 or somebody that worked for me.

20 Q. Which people are you referring to?

21 A. In those shared service functions: HR, Legal, Finance
22 and IT.

23 Q. So where Royal Mail Group are providing it, you're not
24 responsible for those people; is that what you're
25 saying?

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1 same level of accountability that David had had? And
2 I was persuaded during these conversations, in the build
3 up, that it would work. I felt rather embarrassed that
4 I'd sort of confessed any ego over a job title. It
5 wasn't about the job title, it was about the
6 accountability.

7 Q. And accountability you accepted?

8 A. Yes, yes.

9 Q. You earlier referred to -- when asked about legal being
10 a group function -- legal being centralised in other
11 group companies?

12 A. Mm.

13 Q. Are you aware of another group of companies where legal
14 is centralised, at the group level or the parent level,
15 and the subsidiary carries out or is responsible for
16 prosecuting members of its own workforce?

17 A. No, I'm sure not.

18 Q. Do you think Post Office Limited would have benefited
19 from its own legal team?

20 A. Well, I would have liked its own legal team, I would
21 have felt happier, I would have felt more accountable.
22 I'm not saying to you that the problems would have been
23 unearthed massively quicker as a result but I would have
24 been closer to the issue.

25 Q. What was stopping you from having your own legal team?

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1 A. Yes, that's right, yes. I'm not saying I'm not
2 responsible for the issues but the people were --

3 Q. Yes, the people, yes.

4 A. -- not paying rations(?), Post Office employees, if you
5 see what I mean.

6 Q. What was your view on Legal being a group function?

7 A. In large groups, it's not uncommon because, if you
8 centralise, you know, a specialist expertise, you can
9 probably get a higher standard group by having them
10 central and building a career for lawyers or HR or
11 Finance, or whatever it is.

12 I was a little reluctant when I was being offered
13 the job because I would prefer to have had my arms
14 around everything. On the other hand, as I say in my
15 witness statement, it was sort of an -- I understood the
16 aspiration from a Royal Mail Group perspective why it
17 would be sensible to achieve those synergies by having
18 specialist functions centralised and, in the
19 conversations I was having about being appointed, when
20 I was offered the role, I was sort of exercised -- this
21 may sound like ego and it's not meant to be at all --
22 I was exercised by the fact that David Mills, my
23 predecessor, was the Chief Executive of the Post Office
24 and I was being offered the job of Managing Director.

25 And so my suspicion was: was I going to have the

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1 A. Well, it was not the proposed organisational structure,
2 so it wasn't -- it was a non-negotiable when I was being
3 appointed.

4 Q. When you were on -- as Managing Director, you sat on the
5 Royal Mail Board.

6 A. Correct.

7 Q. Did that mean you had some oversight of Royal Mail's
8 Legal Department?

9 A. And that's how I got my head round this structure being
10 okay, was, at the end of the day, it's not like I wasn't
11 going to be on the board of Royal Mail Holdings, which
12 I was. Obviously, that's high up, but the Board, as I'd
13 said earlier, was in the majority of non-execs and then
14 there were four business unit heads effectively, the
15 Royal Mail Letters business, Parcelforce, GLS -- which
16 was a European parcels business -- and Post Office. So
17 I was one of four.

18 Q. Can we turn, please, in your statement, page 7,
19 paragraph 24. You say in the middle:

20 "However, over time, I came to realise that the
21 Board's [and you're referring to the Post Office Limited
22 Board] scope was not as broad as I would have expected."

23 How did the Board's scope not match with your
24 expectations?

25 A. Well, an example would be that the Audit Committee that

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1 existed was the Royal Mail Holdings Audit Committee, and
 2 hung off the Royal Mail Holdings Board. There was no
 3 audit committee for the Post Office Limited Board. So
 4 that's just an example of the scope that reliance was
 5 placed on Royal Mail Holdings governance, as well as
 6 Post Office Limited governance. Otherwise, for example,
 7 producing the annual results and having the accounts
 8 audited was a process that would have been run through
 9 an Audit Committee and that Audit Committee was at the
 10 Royal Mail Holdings level, which I freely accept I was
 11 on the board of Royal Mail Holdings but I'm just saying
 12 it's -- from a Post Office Limited Board's perspective,
 13 they were -- they weren't the accountable party.

14 **Q.** You're talking about the Audit Committee there but, in
 15 terms of how you could oversee the operations of the
 16 business on a day-to-day level, were you satisfied that
 17 the Post Office Board had sufficient scope to do that
 18 that task adequately?

19 **A.** Yes, yes.

20 **Q.** You say in your witness statement -- we don't need to
 21 turn it up -- that there was a Risk and Compliance
 22 Committee?

23 **A.** Mm-hm.

24 **Q.** Now, as I understand it, the Risk and Compliance
 25 Committee sat below the Post Office Limited Board?

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1 that the business investigated theft, fraud and false
 2 accounting --

3 **A.** Yeah.

4 **Q.** -- but you thought that it went to another agency for
 5 the prosecution of the --

6 **A.** The expressions that you would typically see were things
 7 like the case went to court, and it was -- you know, and
 8 I now know, because I've pored all over this and checked
 9 all the figures, that about a third went down that route
 10 but two-thirds were the Post Office taking the decision
 11 to prosecute themselves.

12 **Q.** We're going to come to that part of your evidence
 13 shortly.

14 **A.** Yeah.

15 **Q.** You now know that, whilst you were a Non-Executive
 16 Director and Managing Director, that the Post Office
 17 alleged to be the victim of crimes, it investigated
 18 those crimes itself and decided whether to prosecute?

19 **A.** I too, yes.

20 **Q.** Do you accept that a company's involvement in
 21 prosecutions such as that inherently creates risk for
 22 the company?

23 **A.** Yes, I think it must.

24 **Q.** What do you think those risks are?

25 **A.** Well, I think, if somewhere that is not the organisation

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1 **A.** Correct.

2 **Q.** Was it a formal subcommittee of the Board or
 3 an Executive Committee?

4 **A.** Well, it was a formal subcommittee of the Board but it
 5 was primarily comprising of executives, as I explained
 6 earlier, yeah.

7 **Q.** So, in those circumstances, would you accept that it's
 8 good governance for the minutes of those committee
 9 meetings to be submitted and reviewed by the Board?

10 **A.** It would be, yes.

11 **Q.** I want to turn now to Post Office prosecutorial role.

12 **A.** Mm-hm.

13 **Q.** Now, obviously, one of the issues the Inquiry is
 14 examining is how that role was overseen. Now, your
 15 evidence, which we will come to shortly, is that you
 16 were unaware that Post Office was involved in the
 17 prosecution of subpostmasters until May 2009?

18 **A.** No, that's not quite right. I was unaware that the Post
 19 Office were the prosecuting authority, if you see what
 20 I mean. I knew there were court cases but I didn't
 21 realise that Post Office, in about two-thirds of the
 22 cases, had initiated the prosecution as opposed to, you
 23 know, the DPP or the police or whatever, just to
 24 clarify --

25 **Q.** So to clarify that, you're saying that you were aware

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1 in question is making the call to -- it's all about
 2 independence. It's making the call to prosecute, then
 3 one would go into that with a greater degree of comfort.
 4 It doesn't mean that the case would be won or lost. It
 5 just means that there was probably a higher bar to be
 6 cleared before a prosecution was initiated.

7 Now, a lot of the evidence in these cases was on the
 8 face of it quite compelling. But that's not really the
 9 point. The point is how much independence is there in
 10 the thought process?

11 **Q.** You say you weren't aware of Post Office's position as
 12 making decisions on whether to prosecute. Assuming you
 13 had been, while you were Managing Director, the risks
 14 you've described, would you have foreseen those at the
 15 time?

16 **A.** I would have been uncomfortable because I would not have
 17 encountered that before. So I would have probed the
 18 principle and, you know, it would be hypothetical for me
 19 to say what might have happened but it's an area that
 20 I might have gone down to say "Well, how then -- how
 21 then do we -- are we comfortable that we're doing this
 22 and, if the power is the power, what level of
 23 independence could we build into that decision-making
 24 process inside the Post Office?"

25 So, you know, the Post Office had many strands to

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1 it. I don't know whether this was the case but I would
 2 have, at the very least, looked for line manager
 3 sign-off, you know, in the Operations area rather than
 4 the Legal area, so it wouldn't be something that just
 5 legal would do. But that's all hypothetical, probably
 6 not helpful, to be honest.

7 **Q.** Yes, well, let's turn to look at your actual knowledge
 8 and what you say in your witness statement. Can we go
 9 to page 21, please, of the statement, and paragraph 59.
 10 It talks about the Risk and Compliance Committee and,
 11 about five lines down, you say:

12 "To the best of my knowledge, the Risk and
 13 Compliance Committee was not given any information or
 14 reporting, nor did it have any oversight of the
 15 prosecution of SPMs. As a result, I did not take any
 16 steps, as a member of the Risk and Compliance Committee,
 17 to ensure that POL was acting in compliance with its
 18 legal obligations in relation to those prosecutions and
 19 civil proceedings against SPMs. I was not aware that
 20 they were taking place."

21 **A.** Correct.

22 **Q.** So where you say you were not aware they were taking
 23 place, what precisely do you mean?

24 **A.** It's probably not sufficiently precise. I knew there
 25 were prosecutions but prosecutions by the Post Office,

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1 prosecution"; is that it?

2 **A.** That is correct, and it may be that they assumed I knew
 3 that.

4 **SIR WYN WILLIAMS:** Well, there may have been many
 5 assumptions, but that's the state of --

6 **A.** That was --

7 **SIR WYN WILLIAMS:** -- play, as far as your evidence is
 8 concerned?

9 **A.** Yes, that's right. That was the point I was trying to
 10 get across. It's quite subtle but it's very important.

11 **MR STEVENS:** Can we look, please, at the -- well,
 12 POL00021418. This is a note of the Risk and Compliance
 13 Committee meeting on 29 September 2005. You'll see at
 14 the bottom your apologies, which means you weren't in
 15 attendance.

16 **A.** Correct.

17 **Q.** Do you remember reading these minutes?

18 **A.** I don't. I mean, this was 18 years ago, whatever,
 19 I don't remember. I'm sure I would have been sent them.
 20 I did not typically -- while I was a non-exec, I did not
 21 typically attend this Risk and Compliance meeting and
 22 I didn't realise I was -- I mean, obviously, I must have
 23 had the minutes but I didn't realise I was being
 24 recorded as not in attendance but I would have received
 25 the papers, I'm sure.

19

1 as opposed to from somewhere else, was what I was
 2 talking about.

3 **Q.** So what did you think happened in terms of -- who did
 4 you think did the investigation?

5 **A.** Oh, Post Office, there was an Investigation Team. They
 6 did the investigation. As I said, expressions were used
 7 like "This is going to court". I had assumed that the
 8 police/DPP had been involved -- I mean, I shouldn't have
 9 presumed but I did presume, sadly -- and that we were
 10 then -- it had gone to court, was the expression used.

11 I had not encountered the notion of an organisation
 12 that could make that decision on its own and I suppose
 13 I had too much assumed knowledge and, you know, when you
 14 see the words that were written, I can see why
 15 I still -- that view still perpetuated in my mind
 16 because it didn't overtly say, "We have taken the
 17 decision to prosecute".

18 So one of my regrets, that I didn't pick up on that
 19 earlier.

20 **SIR WYN WILLIAMS:** As I understand it, it follows from what
 21 you're saying that, when you became the Managing
 22 Director, no one within the company, Post Office
 23 Limited, thought it necessary to tell you "And by the
 24 way, we prosecute people in the sense that we don't just
 25 investigate them but we initiate and conduct the

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1 **Q.** Would you have read them?

2 **A.** Yes. I'm a voracious reader.

3 **Q.** Could you please turn to page 6, and the bottom of the
 4 page, please. Under "Updates on major incidents", it
 5 says:

6 "Post Office Limited has a principle of undertaking
 7 criminal prosecutions for all cases where it is in the
 8 public interest, but noting that likelihood of recovery
 9 and circumstances of the defendants and the victims may
 10 be relevant to that decision."

11 That's saying in terms that the Post Office made
 12 decisions to prosecute, isn't it?

13 **A.** It does. It's not how I read it. This is my regret.
 14 I mean, there was a sort of, I don't know, a sort of
 15 high and mighty, tone sometimes there, and people,
 16 I don't know, it fed a sense of self-importance. It
 17 never occurred to me, reading that, that the Post Office
 18 was the sole arbiter of whether or not that criminal
 19 prosecution would proceed. I felt what they were saying
 20 was "We agree it's proceeding" but somewhere else had to
 21 agree to it going ahead.

22 **Q.** Where did you get that assumption from, that it was
 23 somewhere else?

24 **A.** I had never come across a situation before where
 25 a trading entity could initiate criminal prosecutions

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1 themselves, so I am not blaming others for this. It's
 2 my misunderstanding but I just had not encountered that
 3 type of situation, and I would have just read those in
 4 the vein of "We agree it should be done".

5 **Q.** Do you think you should have known that Post Office was
 6 making those decisions?

7 **A.** I think I should, yes, and that's -- clearly there are
 8 many regrets on many aspects of this but that is one of
 9 mine, that I didn't understand -- I was going to call it
 10 a subtlety, that would be an insult, it's not
 11 a subtlety, it's really important -- but it was
 12 a different nuance on it.

13 **Q.** Could we, please, turn to POL00021421. This is another
 14 Risk and Compliance Committee meeting on 6 September
 15 2006. At this point, we see that you're in attendance
 16 as a member?

17 **A.** Because I was then the Managing Director, yeah. I think
 18 Sir Mike Hodgkinson talked yesterday about the debate
 19 about the appropriateness of me being there or not as
 20 an executive but I felt quite strongly that this would
 21 be a committee that I should attend as Managing
 22 Director.

23 **Q.** Why was that?

24 **A.** It's something I've done in all the companies that I've
 25 chaired or been involved in since I always go to the

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1 to. So there was a constant stream, these investigation
 2 reports would have a whole range of issues, you know,
 3 for example, I don't know, travel money cards or we were
 4 issuing cash on plastic, which seemed a very innovative
 5 thing at the time, believe it or not, considering how we
 6 all behave today, but there was a lot of potential fraud
 7 to investigate.

8 **Q.** But you knew that they investigated allegations of fraud
 9 within sub post offices?

10 **A.** Yes, yes, or even in Crown Offices or franchise offices,
 11 yeah.

12 **Q.** Did you know that was part of the Security Team?

13 **A.** Yes.

14 **Q.** In terms of reporting lines, what was your relationship
 15 to the Security Team?

16 **A.** They reported through the Operations Director. I can't
 17 remember how many layers but, ultimately, the Operations
 18 Director was responsible for that and the Operations
 19 Director reported to me.

20 **Q.** Did you ever have discussions with members of the
 21 Security Team outside of the Risk and Compliance
 22 meetings?

23 **A.** I would have thought so. If you're going to follow up
 24 with a question of what was one of those meetings,
 25 I would struggle to remember, to be honest. But I was

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1 Risk and Compliance Committee, because that's where
 2 a lot of the detail is and, putting it crudely, that's
 3 where the risks lie. And I've always worked in
 4 regulated businesses, so the word "compliance" is quite
 5 important because you're working to a set of statutory
 6 rules for many of the different products that we were
 7 selling, so compliance with those rules feels like
 8 a really important thing for the boss to have his head
 9 round.

10 **Q.** Could we turn, please, to page 4 and go to the bottom of
 11 the document, and it says, "Investigation Activity
 12 Period 5 Report", and it refers to Dave Pardoe
 13 presenting the key points from the monthly Investigation
 14 Team. Do you recall who Dave Pardoe was?

15 **A.** Well, I assume he was a member of the investigation --
 16 I recognise the name but I can't see him in my mind's
 17 eye and I assume he was on the Investigation Team,
 18 I don't know.

19 **Q.** What do you think the Investigation Team did?

20 **A.** Well, they investigated all aspects of fraud and, just
 21 to make it plain, more cash went through the Post Office
 22 organisation than any other organisation, you know,
 23 80 billion a year. The potential for fraud was endless.
 24 But the fraud I'm talking about is what the customers
 25 were up to, not particularly about what staff were up

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1 quite a visible boss, I think, and so I would make it my
 2 business, if it was possible. If somebody had written
 3 me something from inside the organisation, my tendency
 4 would be to get up and go and find that person and talk
 5 to them about it, and that visibility, I think, was good
 6 that I was always walking round the building on the days
 7 that I wasn't out in the network, and then you connect
 8 better with people. So I'm sure I had contact but
 9 couldn't give you an example, to be frank.

10 **Q.** But with that visibility and the likelihood of talking
 11 to them, your evidence is still that, at no point in the
 12 years that you were a Managing Director, anyone in the
 13 Security or Investigation Team raised the fact that they
 14 made decision to prosecute?

15 **A.** I -- well, that is my position, definitely. I think
 16 it's sometimes what's said and what's heard, and the
 17 problem that I was bringing to the piece was I just had
 18 a presumption and I didn't hear something sufficiently
 19 categoric to say "What, you mean we decide on our own
 20 and no one can stop us?" I never asked that question.
 21 Well, when I say I never asked, I did obviously when we
 22 got to the Computer Weekly article, which we'll get to
 23 but, prior to that point, I had gone through not picking
 24 up that. And I'm not blaming them for not spelling it
 25 out enough; to be frank, I'm blaming me for not picking

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1 up on it.

2 So people can say things and they feel that's okay,

3 he was okay with that. Well, I wasn't okay with it;

4 I just didn't really appreciate what was meant.

5 **Q.** Can we bring the same document back up, please. Still

6 on page 4, please. It goes on to say what was in the

7 report. It says:

8 "In particular, the report focused on the Accrington

9 DMB ..."

10 That's directly managed branch, is it?

11 **A.** Yes.

12 **Q.** "... £600,000 fraud, successes using Proceeds of Crime

13 Act ..."

14 What does that mean to you?

15 **A.** I don't really know, to be honest.

16 **Q.** Was it the case that you were discussing the Post Office

17 Limited using the Proceeds of Crime Act to --

18 **A.** Yes, so if that's coded speak for Post Office making

19 prosecutions, then so be it. That's not necessarily

20 what I read it as.

21 **Q.** That's not what I'm putting to you.

22 **A.** Okay.

23 **Q.** I'm putting to you had that refers to a discussion of

24 Post Office Limited using the Proceeds of Crime Act to

25 recover funds from persons it accuses of theft or fraud.

25

1 **Q.** Yes. Before we move on, the second paragraph on 3.2

2 refers to concerns about checks and appropriate method

3 of payment, and it says:

4 "Likewise, issues were raised with the ... Instant

5 Access Saver Account and travel cards offers, in

6 themselves solid offers that are spoilt by branch

7 non-conformance."

8 It says:

9 "Alan voiced an opinion that he was against

10 modifying an offer (to the detriment of the customer) in

11 order to force branch conformance and would rather

12 expect steps to be taken to drive conformance -- by

13 sanction if necessary."

14 **A.** Yes.

15 **Q.** What sanction is that referring to?

16 **A.** That doesn't really sound like me but, yeah, it would

17 be -- if we were just -- if we had to stop -- and don't

18 forget cheques were still a big thing back then -- if we

19 had to stop taking cheques because we had people who

20 couldn't handle the cheque correctly, that seemed

21 disadvantageous to customers. So what we needed to do

22 was to find a way of making sure that we followed the

23 right procedures.

24 Now, very often, I have to say, the challenge was

25 the procedure was cumbersome in the first place. So it

27

1 **A.** Okay, yeah.

2 **Q.** Would that have happened; would that conversation have

3 happened?

4 **A.** Well, it's in a report that I would have received.

5 **Q.** Well, you were at this meeting.

6 **A.** Yeah.

7 **Q.** Yeah.

8 **A.** I can't remember the conversation, obviously, all that

9 time ago, but --

10 **Q.** It says:

11 "... and the better targeting of audit resource on

12 dishonest branches."

13 Dishonest branches, that's referring to

14 subpostmasters accused of theft, fraud and false

15 accounting, isn't it?

16 **A.** Yes, it is, yes. Well, I don't think it's just

17 subpostmasters. But, you know, if there's -- if there

18 were problems with a branch, there were many different

19 types of branches. I mean, a significant quantity of

20 the branches were franchised to supermarket chains and

21 high street retails, you know, so there were -- there

22 was a group of directly managed branches where the staff

23 in them worked for me. There was a large tranche of

24 branches that were partnerships with other retail

25 organisations, and then there were subpostmasters.

26

1 is harder to conform if the process is complicated. So

2 I spent many years in customer operations, it's the line

3 I grew up in, and you can engineer these problems out by

4 changing processes and procedures, and you can't make

5 them foolproof, but you can design, if you're not

6 careful, processes that make it more likely that people

7 will make mistakes.

8 And I did -- one of the things I did, as part of my

9 induction when I became Managing Director, rather than

10 Chief Exec was, I did the Horizon, the fast version of

11 the Horizon training course, and I went and worked at my

12 okay Crown Office for a day, which was probably one of

13 my most stressful days at the Post Office but it showed

14 to me that it was a complicated thing to do.

15 **Q.** Okay. I want to show you another document, please.

16 It's POL00048361. This was a document that was given to

17 you this morning.

18 **A.** Oh, right, yes.

19 **Q.** So this is "Investigation Team Report Period 9, December

20 2006". In the top left it says, "POL ET". That's the

21 Post Office Limited Executive Team, isn't it?

22 **A.** Yes, yes.

23 **Q.** These are the types of reports we were referring to in

24 the last set of minutes --

25 **A.** Correct.

28

1 Q. -- which would be sent to you?
 2 A. Yeah, yeah.
 3 Q. You see in the top right, it says it's from Tony Utting
 4 with the job title National Investigation Manager?
 5 A. Mm-hm.
 6 Q. Do you remember working with Mr Utting?
 7 A. I don't, to be honest. I recognise the name. It
 8 depends what you mean by remembering working with him,
 9 I knew the name but I can't place him now after all
 10 these years.
 11 Q. When Mr Utting gave evidence to the Inquiry, he said
 12 that he had acted as Designated Prosecution Authority to
 13 make decisions on prosecutions?
 14 A. Right.
 15 Q. I assume you can't agree or disagree with that?
 16 A. No, that's the first I've heard of it. Yeah.
 17 Q. If we look down below what the investigation -- it says,
 18 "Investigation Team Report", the title there, and it
 19 says beneath that:
 20 "The principle *[sic]* aims of the Investigation Team
 21 are to stop criminal offences taking place, apprehend
 22 and prosecute those who commit offences against us in
 23 order to maximise our recovery and reduce loss to [Post
 24 Office Limited] and its clients through the
 25 identification of areas of weakness", and it goes on.

29

1 You would have seen this at the time, wouldn't you?
 2 A. Yes. Sorry, the screen has gone blank, actually.
 3 Q. Yes, it's just --
 4 A. Okay, right.
 5 Q. £48,000, that's a significant loss to the business,
 6 isn't it?
 7 A. Yes.
 8 Q. The idea of these investigation reps is that you get
 9 them on a monthly basis; is that right?
 10 A. Mm-hm, yeah, yeah.
 11 Q. It enables the Executive Team to trace through from the
 12 point of a loss is, found right through to the outcome
 13 of the case; correct?
 14 A. Mm-hm, yes. Sorry.
 15 Q. Is it not the case that whilst this case was going
 16 through when you received updates on it, at some point,
 17 you would have been told that a decision had been made
 18 to prosecute?
 19 A. Well, I think not, really. I don't think that's the
 20 case. These cases were reported on, and if they went --
 21 as I said, the terminology, and it's even used in that
 22 particular paper, "went to court" --
 23 Q. Well, they went to court --
 24 A. Yes.
 25 Q. Even if the Post Office made the decision, the case went

31

1 A. Yeah.
 2 Q. Again, this is saying in terms that Post Office Limited
 3 prosecuted people, isn't it?
 4 A. Yes. No, no, it's the same point. I do understand and
 5 accept the point. I still didn't take out of it that we
 6 were the final decider in so many cases to prosecute.
 7 This report, I saw it this morning, it just reminds me
 8 of the scale of activity in an organisation that handles
 9 so much cash. So there's so many things, if you look,
 10 here about the different types of product, the risk of
 11 fraud and, primarily to me, when I was hearing the word
 12 "fraud", I was thinking it was we or the Bank of Ireland
 13 was being defrauded by customers. And, you know, very
 14 often it was but there was another dimension which was
 15 staff as well.
 16 Q. If we turn to page 3, please, and the second paragraph.
 17 Sir, I'm sure I'm going to get this wrong, I think
 18 it's Gaerwen Post Office branch. I can see a wry smile,
 19 I probably have got that wrong, but anyway.
 20 But this refers to the prosecution of Noel Thomas,
 21 a Core Participant in these proceedings, and it said:
 22 "The subpostmaster pleaded guilty to false
 23 accounting by inflating his cash account by
 24 approximately £48,000."
 25 It goes on to describe the case.

30

1 to court?
 2 A. Well, those two things don't quite go together. So it
 3 went to court. I had not assumed that we had made -- we
 4 might have wanted it to go to court but I didn't realise
 5 that we had the power, back then, to take it to court,
 6 regardless of what anybody else might think.
 7 Q. If Post Office Limited had been dealing with the CPS or
 8 the police to handle these types of cases, would that
 9 have been described within the CPS that was
 10 a stakeholder?
 11 A. Well, about 30 per cent of them went down that route,
 12 I understand. I never saw a differentiation, nobody
 13 ever -- you know, it wasn't who decided as it went to
 14 court. And, as I say, I now understand, I sat and
 15 worked it out the other evening, just under 30 per cent
 16 meant that route, so the majority were the Post Office
 17 making that call. But I had not appreciated that at the
 18 time, until late in 2009.
 19 Q. Well, we'll come to late in 2009 shortly.
 20 How do you think that prosecutions were overseen in
 21 Post Office?
 22 A. By the Investigation Team.
 23 Q. So is it effectively that what -- is your evidence,
 24 effectively that the Investigation Team and the Security
 25 Team maybe ran the investigations but at board level.

32

1 There was no oversight --

2 **A.** Well, it reported up through the Operations Director.

3 But we wouldn't have been progressing each case at board

4 level because the organisation was just too large, it

5 just wouldn't be looking at individual cases. If

6 something notable happened, and that Welsh one was

7 notable, I guess, and it got its whole paragraph. But

8 when I would have read that, I would have seen that the

9 postmaster pleaded guilty.

10 My concern now, I understand it, is that postmasters

11 were being advised to plead guilty even if they thought

12 they weren't, in order to reduce --

13 **Q.** We're looking at the decision on prosecution.

14 **A.** Yeah, okay. Sorry, I digress.

15 **Q.** Let's look at things in another way.

16 **A.** Yes.

17 **Q.** Are you aware that the central legal department in Royal

18 Mail Group provided legal advice on the prosecutions?

19 **A.** I assumed they did, yes. I took comfort from the fact

20 they were there.

21 **Q.** So you knew that Royal Mail Legal had some involvement?

22 **A.** Yes.

23 **Q.** What did you think they were doing?

24 **A.** Well, it's not an unusual governance structure to have

25 a large central support function that's providing

33

1 **Q.** Why did you think that?

2 **A.** Because they were responsible for the legal function.

3 **Q.** I'm going to go back to the hypothetical where we

4 started earlier. If you were aware, assume you were

5 aware, that Post Office Limited were making the

6 decisions to prosecute, yes --

7 **A.** Yes.

8 **Q.** -- would you have sought to get a legal function within

9 Post Office Limited?

10 **A.** Well, the latter wasn't an option because that had been

11 debated when I first was offered the role. But I would

12 have -- if I had discovered that back then, as I think

13 I've already said, I would have then looked at how we

14 could put safety checks in, and whatever, but it would

15 be something that I would have reviewed with the Group

16 Legal Director.

17 **Q.** With hindsight, do you think relying on the Group Legal

18 Department was effectively putting that advice too high

19 up the chain?

20 **A.** Well, I think it was a mistake on my part. You know,

21 I'd -- I shouldn't have allowed the organisational

22 structure to give me any sense of less of

23 an accountability because I was accountable. But no,

24 I don't think -- this was quite a big deal. I think it

25 would be right and justifiable for me to be talking to

35

1 a service to two or three different business units in

2 a group, and one of the -- and, for one of those

3 business units, there would be a more senior person,

4 lawyer or accountant or whatever, that would establish

5 a close relationship with the business unit. But their

6 main boss would be the central function.

7 Now, if you're in that business unit, you take some

8 comfort from the fact that there's a more high power

9 individual in Royal Mail Group that is exercising

10 technical oversight over what those people are doing.

11 **Q.** What did you think they were taking oversight of, for

12 you to gain any comfort?

13 **A.** The quality of the legal decisions being made.

14 **Q.** What were the legal decisions being made?

15 **A.** Well, there was a whole variety of things, we had, you

16 know, fraud on Post Office Card Account. There was

17 loads of activity going on that was nothing to do with

18 the Horizon issues and subpostmasters.

19 **Q.** Right. So let's focus purely on the decision to

20 prosecute. Did you realise that -- sorry, let's make it

21 broader than that -- the investigation of subpostmasters

22 for theft, fraud and false accounting and the subsequent

23 prosecution, did you think that the Royal Mail Group

24 Legal Department had any involvement in that?

25 **A.** I would have thought they'd had oversight, yes.

34

1 the Group Legal Director and seeking personal assurance

2 from him that he was comfortable with what they were

3 doing.

4 **MR STEVENS:** Sir, I'm going to move on to another topic,

5 I know it's slightly early, but I wonder thought if it

6 might be more sensible to have a break there and then

7 have a longer break until we swap.

8 **SIR WYN WILLIAMS:** Yes, however you wish to pursue it,

9 Mr Stevens. What time shall we start again?

10 **MR STEVENS:** 10.35?

11 **SIR WYN WILLIAMS:** Fine.

12 **(10.22 am)**

13 **(A short break)**

14 **(10.38 am)**

15 **MR STEVENS:** Sir, can you see and hear me?

16 **SIR WYN WILLIAMS:** Yes, thank you, yes.

17 **MR STEVENS:** I'm apologise, I'm going to have to go back to

18 the topic I was just covering. We've given a new

19 document to Mr Cook, which he hasn't, I don't think,

20 seen before, at least not -- I shouldn't say that: he

21 hadn't seen recently. Can I turn that up now, please,

22 it's WITN01820101. Can we go to page 6, please.

23 Mr Cook, this is a letter dated 3 September 2008, to

24 Mr Sabet. Have you seen this recently?

25 **A.** Five minutes ago, yeah.

36

1 Q. If we can go to the end of the letter, please, on the
2 other page. It says, "Yours sincerely" and then we've
3 redacted that but it says, "Alan Cook". Did you sign
4 this letter?

5 A. I would assume so, yeah.

6 Q. Could we go, please, back to page 1 -- I'm so sorry,
7 page 6; I meant page 1 of the letter. That's very
8 misleading of me. Can we go to the bottom, please.
9 Thank you.

10 So it's referring to previous correspondence about
11 disputed accounting errors. It refers to audits and
12 identified shortages totalling £50,000 -- sorry,
13 £50,619.17, and an outstanding recovery.

14 The last paragraph says:

15 "In terms of the decision to issue court
16 proceedings, the investigations undertaken by the Post
17 Office Security Team are to decide whether there is
18 a criminal case to answer. This is independent from any
19 action that may be taken by the Contracts team, whose
20 role is to focus on contractual related issues only.
21 I believe that Carol Ballan, Contracts Manager, has made
22 this differentiation quite clear during one of the
23 several conversations she has had with you over the past
24 few months.

25 "It gives me no pleasure to write a letter such as

37

1 A. There would have been a file of papers with this,
2 typically, so there would have been -- I forget the
3 beginning. Was this responding to a letter from
4 Mr Sabet? I can't remember.

5 Q. Yes.

6 A. Yes, so there would have been his letter, a report from
7 the relevant part of the organisation and this letter to
8 sign, and they would have drafted the letter.

9 Q. Over the course of working there for number of years, in
10 responding to this letter, you would have known,
11 wouldn't you, that Post Office Limited made the decision
12 to prosecute in some cases?

13 A. I didn't appreciate it was their sole decision.
14 Clearly, we would have had to have decided it wanted to
15 happen but I still felt that it wasn't the Post Office's
16 power to do so. So it's the same point that I was
17 making before the break.

18 Q. I'll move on. I want to look at knowledge of Horizon,
19 please. Could we take your witness statement at page 8,
20 paragraph 27. Paragraph 27 talks about knowledge of
21 Horizon as a Non-Executive Director and I think it's
22 about roughly eight lines down, you say:

23 "I recall asking about reliability in terms of
24 system availability and accuracy."

25 What do you mean by system availability and

39

1 this and I am truly sorry for any impact this situation
2 may have had on your family. At the same time, I am
3 mindful that the cash and stock we are accountable for
4 are public funds. The decision to issue legal
5 proceedings is never taken lightly. The alleged
6 offences of fraud against you are, however, of
7 a sufficiently serious nature to support that this is
8 the correct course of action to take. That decision,
9 therefore, remains unchanged."

10 Therefore, this shows, doesn't it, that you were
11 aware that it was the Post Office Security Team that
12 made decisions on whether or not there was a criminal
13 case to answer.

14 A. Well, this is another example of the same thing. That
15 is not how I read it and we -- clearly, we wouldn't have
16 wanted anyone prosecuted where we didn't believe we
17 wanted to prosecute but I didn't believe that we were
18 the only party that made that possible, if you see what
19 I mean.

20 Q. Mr Cook, before you sign letters you presumably satisfy
21 yourself that they're accurate?

22 A. Yeah, well, it's how I read it at the time, yes.

23 Q. You say you satisfy yourself that they're accurate --

24 A. Yes.

25 Q. -- then how would you have done that in this case?

38

1 accuracy?

2 A. In terms of was it there when it was meant to be there,
3 if you see what I mean. So when the day started, if you
4 turned the thing on, was it available? And, in fact,
5 later on in my time there, that did become an issue,
6 where the system wasn't available, and a lot of the work
7 of the subsequent development of Horizon was to make it
8 run faster, more efficiently and definitely finish all
9 its overnight processing before it needed to come up in
10 the morning. So that's availability and then that it
11 all worked and the screens didn't lock and all that sort
12 of stuff.

13 Q. And it produced accurate accounts?

14 A. Sorry?

15 Q. And it produced accurate accounts?

16 A. Yes, yes. But accuracy was a much broader term than
17 just the accounts. It was obviously, you know, did it
18 perform correctly? If I'm doing a road tax disc, when
19 I press this button, does it produce the right road tax
20 disc, for example?

21 Q. You go on to say:

22 "Availability seemed to be good and I was assured at
23 the time that there were no critical bugs or defects."

24 Who assured you?

25 A. Well, I can't name individuals but, when I was doing my

40

1 rounds, I was in -- walked -- not walked but met with
 2 people in the Operations area and got demonstrations,
 3 certainly one of the two David Smiths would have been
 4 one of the people that I sat down with, the IT guy, to
 5 talk me through the system, its history, its current
 6 level of performance. This was in an environment where
 7 the accuracy of the system was not really in question
 8 but there were issues about, as I say, its oversight
 9 performance and its available.

10 **Q.** Can we just jog on to page 15, please, and paragraph 42.
 11 There you say:
 12 "I have been asked whether I was ever told that
 13 there were no systemic issues with the Horizon or
 14 problem with integrity prior to February 2009."
 15 You say:
 16 "I do not recall being told at any time, whilst
 17 a [Non-Executive Director], that there were or were not
 18 systemic issues with Horizon or problems with
 19 integrity."
 20 So are you talking about something different here to
 21 when you said earlier you were assured on its accuracy?

22 **A.** Well, no, this is -- this was about while I was a NED,
 23 so it was the first 12 months that I was involved in the
 24 Post Office, and the level of briefing I got as
 25 a non-exec was less than I received when I became

41

1 Operating Officer. What it did you know of his
 2 background?

3 **A.** Well, I'd never met him before I joined and he had been
 4 at the Post Office for many, many years and seemed to be
 5 the font of all knowledge, if you see what I mean.
 6 Seemed a respected guy. When I arrived -- sorry, this
 7 when I'm a non-exec, that's right. So he was the Chief
 8 Operating Officer. By the time I was approached to
 9 join, he had indicated his decision to retire, so
 10 I didn't really work with him as an executive but I did
 11 work with him.

12 **Q.** You said he was the font of all knowledge --
 13 **A.** Yeah.
 14 **Q.** -- did that include on Horizon?
 15 **A.** Well, I don't think he was an IT specialist but he would
 16 have had all the history, yeah, he was a knowledgeable
 17 guy.
 18 **Q.** Were you aware he was heavily involved in the pilot of
 19 Horizon?
 20 **A.** I wasn't specifically, no. It wouldn't surprise me but
 21 I didn't know that.
 22 **Q.** Can we turn, please, to page 6, and if we could go down
 23 so that -- that's perfect, thank you.

24 Now, this is a discussion on Horizon Next Generation
 25 which we've been calling Horizon Online. I don't want

43

1 Managing Director and I think this paragraph is talking
 2 about was I told whether or not there were systemic
 3 issues. It was a problem that didn't come up in my
 4 briefing.

5 **Q.** So you were told it was accurate; is that right?
 6 **A.** Well, what I was saying there was that accuracy was not
 7 flagged as an issue.
 8 **Q.** Right.
 9 **A.** Yeah.
 10 **Q.** So, effectively, accuracy and integrity, when you were
 11 a NED, were a non-issue?
 12 **A.** Assumed to be okay, yes.
 13 **Q.** That document can come down. Thank you. Could we
 14 please bring up POL00021487. This is a minute of the
 15 Board meeting of Post Office Limited on 23 February
 16 2005. That was your first Board meeting you attended as
 17 a Non-Executive Director, wasn't it?
 18 **A.** Yes, it must have been, yeah.
 19 **Q.** Looking at the attendance list, who there was
 20 responsible or had expertise in IT?
 21 **A.** Well, it would be Ric Francis as the Operations --
 22 **Q.** Ric Francis?
 23 **A.** Yeah. So people like David Smith, that I referred to
 24 a moment ago, worked for Ric Francis.
 25 **Q.** On the meeting was David Miller, as well, Chief

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1 to cover Horizon Online now. I want to look at (f),
 2 where it says:
 3 "Assurance was provided to the Board that the new
 4 system would have at least a similar standard of current
 5 capability."
 6 Do you recall there being any discussion on the
 7 adequacy of what's called Legacy Horizon, the model of
 8 Horizon that was running at the time.

9 **A.** No, my -- obviously, this was my first meeting but my
 10 impression was there was a level of contentment with the
 11 functionality of the system but not its running cost
 12 and, occasionally, its availability. So I believe this
 13 Next Generation proposal was about making it cheaper and
 14 faster to run. You make it faster, you make it cheaper,
 15 but -- and so the guarantee that was being given was
 16 that it wouldn't reduce the level of capability. There
 17 would be no point making it run faster and cheaper if,
 18 in fact, there were things that we used to be able to do
 19 that we couldn't do any more.

20 **Q.** Was there anyone on the board asking probing questions
 21 as to the capability or the adequacy of the systems?
 22 **A.** Well, my impression, attending this board meeting -- my
 23 very first one -- was that we were treading ground that
 24 everybody in the room had already discussed, apart from
 25 me, because the vast majority of people on that meeting

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1 were the management team. So I'm sure they would have
 2 debated it before it came in. So if there was challenge
 3 within the management team, I didn't see it. That
 4 didn't mean it didn't happen at an earlier meeting. But
 5 the only people I suspect that were looking at this at
 6 that meeting for the first time would have been,
 7 I assume -- I can't remember the attendees -- but Mike
 8 Hodgkinson, I assume, would have been there, myself and
 9 Brian Goggin, if he was there, would have been there
 10 would have been the only people that were seeing it for
 11 the first time, if you see what I mean.

12 **Q.** Was it not precisely your role as a Non-Executive
 13 Director to challenge --

14 **A.** It was, it was.

15 **Q.** The --

16 **A.** It was my first meeting. I can't remember what I asked
 17 but I remember and I've commented in my witness
 18 statement that one of the things I would have imagined
 19 I would have commented on is that, if you're trying to
 20 make the system run faster and more slickly, it is quite
 21 dangerous to try to start changing the functionality at
 22 the same time, right, because the way you test it is to
 23 produce "Does this run faster, cheaper and quicker, and
 24 does it give you the same answer?" If you start
 25 changing the functionality at the same time it makes

45

1 "IMPACT and the POLFS accounting system has moved on
 2 significantly since the last report to the Risk and
 3 Compliance Committee.

4 "The system is not yet processing all transactions
 5 correctly and so the end state of POLFS ledgers which
 6 automatically interface to the main business account has
 7 not yet been achieved."

8 Do you recall reading that and can you tell us what
 9 your views on it were?

10 **A.** I don't remember specifically. I can't interpret from
 11 that, is that something that's in a testing phase or is
 12 it something that's meant to be in production?

13 **Q.** Well, do you remember what your views --

14 **A.** No, what I'm saying is I don't remember what I might
 15 have said -- well, I didn't say anything because
 16 obviously I wasn't at the meeting but, if I read that,
 17 I would be -- my first question would be "I can't tell
 18 from that paragraph whether this is something that's in
 19 production and being used or it's results of testing
 20 that they're working on". Because it talks about --
 21 it's "moved on significantly since the last report" sort
 22 of implies that these are test results but I don't know.

23 **Q.** So you would have needed to follow up a bit further?

24 **A.** Yeah, I wouldn't have understood that.

25 **Q.** We'll move on to a different topic, please.

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1 interpreting the test results more difficult.

2 Now, of course, the problem is that relies on the
 3 fact that you are comfortable with the functionality
 4 that is already in place. So any counsel I would have
 5 offered would have been on the assumption that the
 6 system functionality was sufficient, was that we should
 7 try not to change the system functionality and focus on
 8 the real objective which, was to get the thing to run
 9 faster and cheaper.

10 **Q.** Please can we turn to POL00021420. It's another Risk
 11 and Compliance meeting, 22 March 2006. So you would
 12 have been Managing Director at that point?

13 **A.** By a few days, yes. The conversation about me being
 14 a regular attendee took place between this meeting and
 15 the next one; and the next one is the one you've already
 16 showed us as me being present. But, yes, I was not
 17 present at this one.

18 **Q.** So you were not present but, again, you missing read the
 19 minutes?

20 **A.** I'm sure, yeah. Well, definitely, because I was in post
 21 by then.

22 **Q.** Could we turn to page 8, please, I believe. Yeah,
 23 page 8. There's an appendix to this concerning the
 24 IMPACT Programme, which the Inquiry has heard
 25 significant amounts of evidence on. It says:

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1 POL00081928. If we could turn to page 13, please. If
 2 we could go to the email at the bottom, please. Thank
 3 you. It's there. That's perfect, thanks, because we
 4 see --

5 It's one of these very unhelpful email print-offs
 6 where we see that it's to Shaun Turner on the 11 January
 7 2006, subject "Callendar Square".

8 Over the page --

9 **A.** Oh, I see. Sorry, yeah.

10 **Q.** It says that:

11 "The [subpostmaster] has reported that he is again
 12 experiencing problems with transfers, [5 January 2006]
 13 which resulted in a loss of around £43,000 which has
 14 subsequently rectified itself. I know that the
 15 [subpostmaster] has reported this to Horizon Support,
 16 who have come up back to them stating that they cannot
 17 find any problem."

18 If we could then turn to page 6, please. If we can
 19 go down to the second email in the chain, thank you.
 20 This is an email the Inquiry has seen before. It's from
 21 Anne Chambers to Mike Stewart, both within Fujitsu, and
 22 it refers to the same issue, Callendar Square. Second
 23 paragraph says:

24 "Haven't looked at the recent evidence, but I know
 25 in the past this site had hit the Riposte lock problem 2

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1 or 3 times within a few weeks. This problem has been
 2 around for years and affects a number of sites most
 3 weeks, and finally Escher say they have done something
 4 about it. I am interested in whether they really have
 5 fixed it which is why I left the call open -- to remind
 6 me to check over the whole estate once S90 is live."

7 So this is a problem that appears to have caused
 8 a discrepancy, a significant discrepancy?

9 A. Mm-hm, and these are both Fujitsu people, you say?

10 Q. These are Fujitsu people, yes.

11 A. Yes.

12 Q. Do you accept it's a problem that caused a significant
 13 discrepancy?

14 A. Well, I don't know. I've only -- I'm just reading this.
 15 I assume it must have done. I've never heard of the
 16 Riposte lock problem before.

17 Q. Well, let me put it this way: if there was a problem,
 18 which had the potential to cause discrepancy of over
 19 £40,000 --

20 A. Oh, I see, because it relates to the email -- yes, okay,
 21 yeah.

22 Q. -- and it had been around for years, affects a number of
 23 sites most weeks, that's a significant concern, isn't
 24 it?

25 A. Yeah. I don't know if that problem is the same as the

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1 meeting on 20 April 2006. If you can just get the
 2 entire attendance list in there, please.

3 Looking down that, in terms of IT people, you
 4 earlier identified Ric Francis.

5 A. Mm-hm.

6 Q. Is there anyone else who had an IT background there?

7 A. Not -- there doesn't seem to be anybody that works for
 8 Ric -- that worked for Ric, that is in the attendance
 9 list so, no, I don't think so.

10 Q. Can we go to page 10, please, and down to the
 11 "Operations Report" section. It says, "Horizon S90
 12 release".

13 So do you remember we saw in the last email it says
 14 that the problem would be fixed with S90.

15 A. Yeah, yeah.

16 Q. It says "This release would", and it lists a number to
 17 things it would do: (i) transfer Bureau debit/credit
 18 card transactions; more to do with debit and credit
 19 cards; some generic payments; and then (iv):

20 "Provide for a plethora of change requests across
 21 a variety of existing capabilities."

22 Did the board interrogate what those changes would
 23 be?

24 A. Well, I can't remember but that would be something
 25 I would normally challenge. You know, a plethora of

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1 discrepancy, but --

2 Q. It's the same email, as I say -- you see at the top
 3 Callendar Square?

4 A. All I'm saying is I don't know if that has produced --

5 Q. I see.

6 A. -- the discrepancy.

7 Q. If we can go up in the chain, please. Sorry, just to
 8 the top, if you can go down a little bit, please.
 9 There's perfect, thank you.

10 That email is forwarded by Mike Stewart to Lynne
 11 Fallowfield, who is at the Post Office. It says:

12 "Lynne, I was waiting for an update on ... Callendar
 13 Square. See the email chain below."

14 It goes on to say:

15 "I think I am inclined as per this issue to wait and
 16 see if all these branches are ok after the S90 counter
 17 roll starts 4th after the pilot this week."

18 That document can come down for the moment.

19 You said you weren't aware of the Riposte lock
 20 issue.

21 A. Yeah.

22 Q. Were you ever aware of an issue at Callendar Square when
 23 you were Managing Director?

24 A. No, I don't -- well, I don't recall. I don't recall.

25 Q. Could we please bring up POL00032210. It's a Board

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1 change requests is -- you get great detail on the first
 2 three and I'm sure they're bigger, and I'm sure those
 3 things will be individually smaller but, if it's
 4 a plethora of them, to use the word then, that suggests
 5 it would require probing. But I don't recall the
 6 conversation I'm just reading it cold here.

7 Q. Based on how the minutes were created at Post Office
 8 Limited, if there had been challenges, would they have
 9 been recorded in the minutes?

10 A. I'd have hoped so.

11 Q. So do I take it from that -- well, what is your
 12 evidence: do you think it was challenged or it wasn't?

13 A. Well, there's no evidence of it being challenged.

14 That's --

15 Q. Why wouldn't it have been challenged?

16 A. I don't know. There could have been some reassuring
 17 words when the thing was presented that saw off
 18 challenge and this is how the person doing the minutes
 19 chose to summarise the conversation. But, I mean,
 20 I literally do not remember the conversation. But there
 21 is clearly no documentary evidence that that fourth
 22 bullet point was probed.

23 Q. Do you think if there was a non-exec on the board with
 24 IT experience, that might have been challenged --

25 A. Yes.

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1 Q. -- or is more likely to have been challenged?
 2 A. Yes, and, interestingly, in roles more recently, it's
 3 become much more common for IT, senior or sort of -- or
 4 recently retired senior IT people to join boards of all
 5 sorts of businesses. So I chaired a small bank and we
 6 had an IT professional on the board. It was always
 7 a struggle for him because he wasn't a banker. But
 8 actually he was there because he was an IT person and
 9 provided useful, independent challenge. But there was
 10 no such person on the board at this time, other than
 11 employees.
 12 Q. Executive members?
 13 A. Yes, executives, that's right, yes.
 14 Q. Did you feel sufficiently able to challenge the
 15 executive?
 16 A. I felt able to challenge the executive to a level that
 17 was comparable with my experience but I wasn't
 18 purporting to be an expert in every functional activity.
 19 So I had a bias in my personal background which said
 20 I was an operations-type guy in my early years, not IT,
 21 but, you know, processing, operations. I spent all my
 22 time in Financial Services and they were all the reasons
 23 why people felt I would be worth having on the board.
 24 But I wouldn't be able to -- and I did actually, for
 25 a period, at the Prudential, run -- responsible for IT,

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1 Q. It provided the data from which the statutory and
 2 management accounts would be compiled?
 3 A. Yeah.
 4 Q. As a director, you had to have confidence in that data
 5 to be able to sign off on the management and statutory
 6 accounts?
 7 A. Yeah.
 8 Q. So it follows, does it not, that you needed to be in
 9 a position to satisfy yourself that the IT system that
 10 generated the data was sufficiently robust and reliable?
 11 A. Correct, and one of the ways any board would get that
 12 level of comfort is from the external auditors, and the
 13 external auditors would come in and they would run
 14 software against the system that was, you know, the
 15 primary driver of the business, and would run their own
 16 reconciliations to make sure does it add up this way,
 17 dare I say it, and does it add up that way, and does the
 18 answer come the same and they'd have run -- and it's
 19 sort of propriety software that's used by auditing firms
 20 to validate the financial integrity of the system they
 21 are auditing.
 22 Q. That type of audit has the concept of materiality,
 23 doesn't it?
 24 A. Yes, it would.
 25 Q. Can you just explain what that is?

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1 but I had an IT Director supplied by Accenture that
 2 reported to me, so I wouldn't have been a detailed
 3 specialist.
 4 Q. At any point did you ask for more support with IT to be
 5 able to challenge the executive in a more adequate way?
 6 A. Well, the point was that the -- there wasn't an appetite
 7 to have other non-execs on the Post Office Limited
 8 Board, and we did have the Group IT Director sitting on
 9 the Royal Mail Holdings Board and, as I said, what was
 10 happening was these things were going up to Royal Mail
 11 Holdings Board, and there was more challenge available
 12 there, there was a Group legal director, there was
 13 a Group IT Director and, whilst they were employees,
 14 they weren't branded just Post Office. So there was
 15 a level of independence in their interrogation.
 16 And I don't think -- I have to say I didn't ask but
 17 I didn't ask because I didn't expect the organisation
 18 would want me to be looking for independent non-execs to
 19 go on the Post Office Limited Board.
 20 Q. Let's stand back a bit. Horizon obviously records
 21 transactions for the Post Office business, yes?
 22 A. Say that again.
 23 Q. Horizon records transactions for the Post Office
 24 business?
 25 A. Yes.

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1 A. So it wouldn't have to reconcile to the penny but it
 2 would have to, you know -- but we're not told about the
 3 penny in these instances here, are we? We're, you know,
 4 it's -- so, so you would -- you should -- it's a pretty
 5 reliable way of proving whether or not a system is
 6 reconciling.
 7 Q. That works, as you say, for statutory accounts --
 8 A. Yeah.
 9 Q. -- in terms of the subpostmaster who may be facing a --
 10 A. No, I was just asking your question on accounts.
 11 Q. And I am asking another one.
 12 A. Okay, yes, I agree, yes.
 13 Q. It doesn't help the subpostmaster who --
 14 A. If you're the rounding error, right, that's no joke. So
 15 every single one needs to work, because there could be
 16 compensating errors, for example.
 17 Q. Was anyone on the board thinking of the reliability of
 18 the Horizon IT System from that perspective, the
 19 subpostmaster's perspective?
 20 A. I think Ric Francis was focused on his user community.
 21 He wouldn't have been thinking just about
 22 subpostmasters; he'd have been thinking about all
 23 people, all types of branch that used Horizon to process
 24 transactions. There were two audiences, really. What
 25 did Horizon feel like for the person on the counter that

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1 was performing the transaction, who might actually work
2 for a subpostmaster? But also what did it feel like for
3 the customer, who is the other side of the counter,
4 receiving whatever, you know, it is they're purchasing?

5 **Q.** So that's Ric Francis.

6 **A.** Yeah.

7 **Q.** In terms of you as a Managing Director, did you think
8 about it from the subpostmaster's perspective of how --

9 **A.** Yes, I did, yeah. I had -- it's only slight digression
10 but certainly when I arrived, I felt the -- that the
11 subpostmaster community felt unloved, to a degree, by
12 Post Office Limited, and one of the -- one of my early
13 objectives was to try to get close to the subpostmaster
14 community and try and resolve that. One of the first
15 things I did was establish a strong relationship with
16 the chap who was then the Federation's top guy, and the
17 top team, and I started --

18 **Q.** Can you just say for clarity -- can you give a name,
19 please?

20 **A.** Colin Baker his name was, sorry. And then I started
21 a programme of visits -- which, in the end, I did for
22 the entire three years and ten months that I was
23 there -- of going out, and I would -- on a Friday, and
24 I would pick a part of the country and then I would say
25 to the Fed and I would say to the regional manager in

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1 was sold and why she couldn't be bothered to sell it
2 because of the torturous process that was followed,
3 following which we changed it.

4 **Q.** Well, let -- so those are individual -- was there
5 anything else you did, other than those visits, to try
6 to understand how subpostmasters found the Horizon IT
7 System?

8 **A.** Well, I wasn't just talking about the Horizon IT System;
9 I was talking about the business as a whole.

10 **Q.** No, but my question is about just the Horizon IT System.

11 **A.** Well, my primary focus was on the Federation, so I used
12 the Federation as, you know, the mouthpiece of
13 subpostmasters to provide input, and then there was a--
14 there was -- on the staff, there was someone that ran
15 the Crown Offices. So I looked at the Federation, the
16 Crown Offices and the franchise branches.

17 **Q.** Just so I've got this clear, during your period as
18 Managing Director, you had your 250 or so visits to
19 branches themselves and then, in terms of further
20 subpostmaster feedback, that was effectively filtered
21 through the NFSP?

22 **A.** Yes, yes, filtered sounds a bit harsh, but yes.

23 **Q.** Well, sorry, it came through the NFSP?

24 **A.** It came through the NFSP. They were -- you know, they
25 were always forthright, vociferous, friendly, it wasn't

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1 the area, "I've got time to visit five branches, give me
2 a list of branches that I can go and visit", and I went
3 randomly and visited them.

4 That was the biggest source of information. Oh,
5 and, just to be plain, it wasn't just subpostmasters;
6 I visited Crown Offices and franchise branches as well.
7 But that was my attempt to keep my feet on the ground as
8 to what the organisation was thinking and worrying
9 about, and, for those subpostmasters in the room, you'll
10 guess, I got plenty of feedback, right, and --

11 **Q.** On that, if I may --

12 **A.** Sorry.

13 **Q.** -- you say in your statement you think you visited about
14 250 branches over a period of years.

15 **A.** Yeah, yeah.

16 **Q.** Without criticising -- I'm not criticising the effort --
17 but, in terms of getting feedback from how users found
18 the Horizon IT System, that was a very, very small
19 proportion of the number of users using it, wasn't it?

20 **A.** Well, all the numbers in the Post Office are very large,
21 right, so you do what you can do. All I can say is that
22 I found the visits illuminating. I can remember being
23 in one village that will be nameless and the
24 subpostmistress took me back into her kitchen behind the
25 shop and went through the process of how car insurance

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1 antagonistic. Colin Baker, in particular, went out of
2 his way to welcome me into the family, if you see what
3 I mean. My wife and I used to go to Federation dinners
4 and all this sort of stuff. It was important to me to
5 get close to the community that was servicing our
6 customers.

7 **Q.** While we are on this, I want to come to what the
8 Inquiry's termed as "responding to the emerging
9 scandal". Can we please look at POL00027890.

10 This a letter, in your statement you've described it
11 as the Porteous Letter. It's sent, we see at the top
12 right -- it's Pat McFadden MP, then Minister for
13 Employment Relations and Postal Affairs.

14 **A.** Yeah.

15 **Q.** It includes correspondence from Brian Binley MP, who, in
16 turn, includes an email from Rebecca Thomson.

17 **A.** Yeah.

18 **Q.** Can we look at the email, please. It's page 3
19 I believe. This is an email dated 10 February 2009 but,
20 as I said before, you only received it on 7 May --

21 **A.** Yeah.

22 **Q.** -- according to the stamp. It refers to speaking to:

23 "... several current and former subpostmasters, who
24 say that random flaws in the IT are causing deficits in
25 their weekly accounts, sometimes thousands of pounds at

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1 a time. The complaint is that, instead of listening to
 2 their problems and investigating the software or
 3 equipment, the Post Office is making them pay back this
 4 money without any investigation into what is going
 5 wrong."
 6 It continues as such.
 7 Do you recall receiving this and reading it?
 8 A. Yes, well, this was the moment, right. Now, strangely,
 9 I saw the article from Computer Weekly before I saw
 10 this, only because, as you remarked, the letter was date
 11 stamped in 7 May. It went out with a deadline -- if
 12 anything came in from Pat McFadden, it was dealt with
 13 quick -- for me to reply about a week later but, in that
 14 week, the Computer Weekly article came out so we're only
 15 talking about a couple of days but the reality is I saw
 16 the Computer Weekly article before I saw this
 17 correspondence and, actually, I didn't particularly put
 18 the two together because my head was full of the
 19 Computer Weekly article.
 20 Q. Yes, we'll come to that shortly.
 21 A. Yes.
 22 Q. That email can come down. At paragraph 79, page 27 of
 23 your witness statement -- it doesn't need to be turned
 24 up -- you say that, when you received that letter, you
 25 indicated to Michele Graves, Executive Correspondence

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1 The *Castleton* trial, the *Post Office v Castleton*,
 2 was heard while you were Managing Director.
 3 A. Apparently so.
 4 Q. You say you were unaware of it?
 5 A. I was unaware.
 6 Q. £321,000 or money -- that amounted to significant debt
 7 to be owed, isn't it? So, in other words, the legal
 8 costs that Post Office spent in pursuing that claim was
 9 significant?
 10 A. Sorry, just to be clear, when I say I was unaware about
 11 this particular case, but we have seen earlier the
 12 reports that were being issued but they were summarised
 13 reports with totals on them. So I'm sure this case
 14 would have been in there but it may not have been
 15 separately identifiable.
 16 Q. So you might not have known the name Lee Castleton?
 17 A. That's right, yeah.
 18 Q. But you --
 19 A. I can't remember, but there was reporting. So I, you
 20 know, which we've seen already this morning.
 21 Q. Did you not think to ask why there was such
 22 a significant legal spend on one case?
 23 A. I just don't recall. I can't --
 24 Q. Do you think why you wouldn't ask that?
 25 A. I can't think why I wouldn't, and so either it was

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1 Manager, that you would like the matter thoroughly
 2 investigated?
 3 A. Yeah.
 4 Q. Okay. Can we look then at the Computer Weekly article
 5 now, please. That is POL00041564. As you say, the
 6 article is by Rebecca Thomson in Computer Weekly. If we
 7 could go down slightly, please. Thank you. It refers
 8 to the case of Lee Castleton, and -- I'll ask this
 9 first: were you aware of Lee Castleton before reading
 10 this article?
 11 A. No.
 12 Q. It states that:
 13 "[He] was declared bankrupt after he refused to pay
 14 the Post Office £27,000 ...
 15 "Castleton insists he did not owe the money --
 16 although it showed as a loss on the Post Office's
 17 Horizon system, which is used by postmasters to do their
 18 accounting. He is one of several postmasters to come
 19 across losses they could not explain."
 20 If you could turn over the page, please. The second
 21 paragraph says:
 22 "Having lost the case, Castleton was left with costs
 23 of £321,000. In 2007, he filed for bankruptcy. 'I was
 24 in too deep -- I see that now. The whole thing has been
 25 heartbreaking', he says."

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1 a mistake on my part or it wasn't in the report.
 2 I don't know. Put it this way: this article was a shock
 3 to me. Should it have been a shock to me? No, it
 4 shouldn't have been. But it was.
 5 Q. That can come down. Thank you.
 6 That's 11th May. You say in your statement, and
 7 you've already alluded to it, in fact make can bring it
 8 up. Please can we go to page 28, paragraph 85 of the
 9 statement. At the bottom, you say:
 10 "... at the time, I did not connect the Computer
 11 Weekly Article to the complaint raised in the Porteous
 12 Letter."
 13 A. Yes, if I could just expand it, when I wrote that,
 14 I hadn't worked out that overlap. I hadn't spotted the
 15 date stamp on the letter, so the reason I didn't connect
 16 it was the Computer Weekly article was the first thing
 17 I read, not the complaint, if you see what I mean.
 18 Q. It is your evidence now that you did connect the two?
 19 A. Well, I connected it afterwards, what I'm saying is when
 20 I saw the Computer Weekly article, I hadn't seen the
 21 complaint case.
 22 Q. So do you think when you read the complaint after the
 23 Computer Weekly article, you would have connected the
 24 two?
 25 A. I can't remember, I mustn't claim things I can't

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1 actually remember, but it seems likely. But ...

2 **Q.** Can we turn, please, to POL00141142. If we can go to
3 page 2, please, and to the bottom.

4 This is an email from Dave Posnett. Now, we see
5 there that the email looks to be dated 05/10/2009.

6 **A.** Yeah.

7 **Q.** Immediately above, it's 20/10/2009 and, if we can go --
8 just go up slightly, please, there should be a date
9 stamp. It might be on the other page, sorry. Can we go
10 to the bottom of page 1, please. It gets quite
11 confusing because you've got 05/10 and then, further up,
12 02/10. The question I have is, in October 2009, are you
13 aware of any investigation that was requested into
14 Horizon integrity issues?

15 **A.** Yes, because it post-dates the Computer Weekly article.

16 **Q.** So you think this all leads from the Computer Weekly --

17 **A.** Yes, I would have thought so, yeah. I don't equally
18 understand the dates because they appear to be in the
19 wrong order but it's October. It sort of doesn't really
20 matter, I suspect.

21 **Q.** If we can now please turn to POL00158368. Could we go
22 to page 23, please. Down to the bottom, please, thank
23 you. It's an email from Michael Rudkin. Do you
24 remember Michael Rudkin?

25 **A.** Yes, I recognise the name, yes. Although, obviously,

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1 Were you seeing this as a significant and escalating
2 issue?

3 **A.** I was then, yes. Hence my -- well, I then expressed in
4 the next sentence my confusion as to why but, yes,
5 I accepted that we had an issue.

6 **Q.** Were you connecting the various Horizon challenges at
7 that point, so the Porteous Letter, the Computer
8 Weekly --

9 **A.** Yeah, that's right, yeah, this is -- this was around
10 that time that it came to the fore for me, if you see
11 what I mean.

12 **Q.** You go on to say:

13 "My instincts tell that, in a recession, subbies
14 with their hand in the till choose to blame the
15 technology when they are found to be short of cash."

16 Why was your instinct to think that subpostmasters
17 who alleged that Horizon caused shortfalls were stealing
18 from the Post Office?

19 **A.** Well, that's an expression I'll regret for the rest of
20 my life, so it was an inappropriate thing to put in
21 an email, not in line with my view of subpostmasters.
22 But one of the often cited problems was, at this time,
23 Mike Hodgkinson talked sort of quite eloquently about
24 the challenges that Post Office had faced in --
25 financial challenges and the danger is that we only

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1 I've read this stuff but, before that, I recognised his
2 name. I think he was Federation connected in some way.

3 **Q.** It says:

4 "See attachment!!!

5 "I presume you have already seen the article in the
6 convenience store magazine."

7 Then there's a bullet point, and the next paragraph
8 goes on to say:

9 "This should also minimise adverse publicity to our
10 industry which is already receiving enough bad press at
11 the moment. Currently, the BBC, Panorama and Watch Dog
12 researches are digging the dirt here in Leicestershire."

13 If we can then go up to see the forwarding email,
14 please, I think it's on the beginning of the next page.

15 Thank you. Yes, the Alan Cook email, thank you. So
16 this is 15 October. You send an email to Mary Fagan.

17 Do you remember who Mary Fagan was?

18 **A.** I definitely do, I definitely remember this email.

19 **Q.** Who is Mary Fagan?

20 **A.** She was the -- well, the PR Officer for the Royal Mail
21 Group.

22 **Q.** It says in the second paragraph:

23 "For some strange reason there is a steady
24 building nervousness about the accuracy of the Horizon
25 system and the press are on it as well now."

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1 think about the profit or not that Post Office Limited
2 were making but I always used to say "We haven't got one
3 bottom line here, we've got 12,001 bottom lines", and,
4 if the Post Office isn't working, then it isn't working
5 for subpostmasters.

6 You know, they've probably got a shop with a sub
7 post office in it, that sub post office needs to produce
8 enough profit for them to make it worth having it there
9 at all. And so, getting the business profitable again
10 meant getting it profitable again for subpostmasters.

11 We had been through a few years when I joined when
12 I don't think the Post Office earnings for
13 subpostmasters were worth the effort they had been
14 putting in, and so that was -- and so I think a number
15 of them were struggling and, when we ran the branch
16 closure programme, was an aim to reduce the number of
17 offices, such that -- and then the same traffic would
18 come through a smaller number of post offices and they
19 would be more profitable, which, of course, is what
20 happened.

21 **Q.** You're talking in a different context there --

22 **A.** Yes, I sort of digressed, I'm sorry.

23 **Q.** Because what's happened here is you've faced challenges
24 by subpostmasters --

25 **A.** Yeah.

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1 Q. -- saying that the system is faulty, and saying that
 2 it's caused shortages, correct?
 3 A. *(No audible answer)*
 4 Q. In perhaps an unguarded comment, you've put that the
 5 instincts were for it to effectively be that the
 6 subpostmasters were stealing and then blaming the
 7 technology. Does that represent your actual views at
 8 the time?
 9 A. No, but it was said, it was --
 10 Q. Why did you say it if it wasn't your views?
 11 A. Well, I had a friendly informal relationship with Mary
 12 Fagan and, it was just an email, I shouldn't have --
 13 it's just an email I shouldn't have written but it was
 14 important to me that she understood exactly where we
 15 were at. But she was a Royal Mail person and it was one
 16 of the areas where I was very, very happy with the
 17 support got it from Royal Mail, so she was very helpful
 18 to me, she was a sounding board and I was probably more
 19 open and frank with what I was thinking with her, than
 20 many other people.
 21 She was also in a different building, which meant
 22 that we swapped emails a lot. And so, as I say, I --
 23 that sentiment was expressed, what I wrote in that email
 24 was unacceptable.
 25 **SIR WYN WILLIAMS:** It wasn't just to her, was it? It was to
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1 at this point into the allegations?
 2 A. Well, I -- the first step seemed to be to investigate it
 3 ourselves. So that was what we did and we referred to
 4 the correspondence a few minutes ago where that process
 5 of, I forget the expression, integrity or whatever it
 6 was, was used, was -- you know, we needed to examine it
 7 ourselves and ask ourselves what could be wrong.
 8 Q. Well, what steps did you take to oversee that
 9 investigation?
 10 A. Well, I asked for the investigation to be done, I was
 11 keen to know who would do it.
 12 Q. Who did it?
 13 A. Andy McLean, who reported to Ric Francis. The reason
 14 I wanted to know who to do it was what did I think of
 15 the person that was going to do it and Andy was a, you
 16 know, no nonsense, knowledgeable guy who, to my mind,
 17 would, you know, speak out if he needed to.
 18 I suspect -- one of the problems, I think, is that
 19 we were still, I think, investigating the cases that had
 20 been highlighted, as opposed to the whole thing, if you
 21 see what I mean. So there -- I still thought we've got
 22 these cases that have got wrong, we've got to find out
 23 the answer.
 24 Q. But what stopped you from getting an external body in to
 25 do that?

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1 Mr David Smith as well?
 2 A. Yeah, quite. Yes.
 3 **SIR WYN WILLIAMS:** Was it your view at the time that he
 4 would have shared your view?
 5 A. I don't know, to be honest. It was regrettable,
 6 I was -- it was like I was just chatting to her in the
 7 corridor but, as you say, sir, it was actually -- there
 8 were other people on the copy list.
 9 **MR STEVENS:** You said earlier that you were very shocked
 10 when you read the Computer Weekly article, correct?
 11 A. Yes, yes.
 12 Q. You'd received several letters from MPs, making the same
 13 complaints?
 14 A. Afterwards, yes.
 15 Q. Yes?
 16 A. Yes, yes.
 17 Q. But there was, I think, a body of opinion growing
 18 here --
 19 A. Yeah.
 20 Q. -- or at least a body of complaints, I should say --
 21 A. Yes.
 22 Q. -- and you say at this point you saw it as escalating
 23 and significant?
 24 A. Yes.
 25 Q. Why didn't you arrange for an independent investigation
 70

1 A. Well, nothing stopped me. I felt we should do the
 2 internal review first. Now, it is complicated by the
 3 fact that I left the business a few months afterwards
 4 but, at that stage, it -- you know, you wouldn't get in,
 5 an external review until you'd asked your own people to
 6 investigate.
 7 Q. So was your thinking that the -- you'd do an internal
 8 review first and then, from there, determine whether
 9 an external review was necessary?
 10 A. Yes, but I had no particular expectation of what would
 11 be found, because, at that stage I thought we were
 12 talking about a handful of cases, and it could have been
 13 a different problem for each one. Now, I have to be
 14 honest, by the time it all came out, I don't know what
 15 the problem was, but it was clearly wider than the cases
 16 that had been highlighted to me.
 17 Q. Could we bring back up, please, POL00141142. Thank you.
 18 That's an email from Dave Posnett on 20 October 2009, so
 19 five days after your email which we were just at.
 20 You're not in copy.
 21 A. No.
 22 Q. It refers to some conference calls. It says:
 23 "David Smith phoned me last week -- asked me a few
 24 questions, and indicated that Alan Cook is asking for
 25 more robust defence of Horizon."
 72

1 Were you asking for a defence of Horizon, rather
 2 than an investigation into its integrity.
 3 **A.** Definitely not looking for a robust defence. Just
 4 looking for answers.
 5 One of the perils of being the boss is that people
 6 use your name to get things done and, you know, it --
 7 I would have responded to that if I'd been copied and
 8 said "That's not what we're after".
 9 **Q.** Dave Posnett could have used your name and said, "Alan
 10 Cook is asking for an independent review of Horizon" or
 11 "Alan Cook is asking for a review into its integrity";
 12 what was put was, "Alan Cook is asking for a more" --
 13 **A.** Yes, I know.
 14 **Q.** -- "robust defence of Horizon".
 15 Are you saying those words didn't come from you?
 16 **A.** I wouldn't have said that, I'd have said -- "Robust" was
 17 a word I used, which I meant thorough and vigorous, but
 18 "defence" wouldn't have been a word I'd use.
 19 **Q.** You'd use "robust" to mean thorough?
 20 **A.** Yes, but defence is a different point. At this stage,
 21 there was the Computer Weekly article and a few
 22 complaints on specific cases, and I was more than
 23 prepared to believe that the answer would be different
 24 to each of them and that the answer wasn't that there's
 25 nothing wrong. But, obviously, that's the stance that

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1 up, please. That was the response, the end of the
 2 response which we referred to, and you're forwarding it
 3 saying:
 4 "We should therefore be careful of approaching him
 5 for further info without talking to Paula first."
 6 Who are you referring to there?
 7 **A.** Paula Vennells.
 8 **Q.** Paula Vennells?
 9 **A.** Yeah.
 10 **Q.** Why did you need to talk to Paula Vennells first?
 11 **A.** I'm not sure, really. I obviously thought it was a good
 12 idea at the time, but this was a network issue, and she
 13 was responsible for the network. So I didn't want to --
 14 there were two lines I could go down. I could go down
 15 the Operations Director line, responsible for the
 16 technology, or I could go down the network line, which
 17 was Paula. And we were focusing, I was focusing too
 18 much on the Operations line and Paula needed to be
 19 brought into the picture.
 20 **Q.** Could we go to the page before, please, just to see the
 21 email chain. Thank you. Just carry on going up please.
 22 So that email, which was on 15 October, is forwarded by
 23 Ruth Barker to Paula Vennells on 5 November. We then
 24 see the next day Paula Vennells replies to Ruth Barker
 25 and you're in copy.

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1 the organisation took in the event.
 2 **Q.** The manner of the investigation or how you chose to
 3 respond to these allegations, was that influenced by
 4 your instinctive view which we went to earlier about the
 5 subpostmasters raising --
 6 **A.** No, it wasn't, actually. My belief would be that we
 7 would find things that were wrong. I'll put it another
 8 way: we would find things that were not the fault of the
 9 people running those Post Office branches. Now, it
 10 could have been the procedures they were required to
 11 follow, it wouldn't necessarily have to be the
 12 technology, but it seemed to me unlikely to have --
 13 I know it wasn't loads -- but that many cases -- what
 14 was it, seven, nine or ten cases -- that are all coming
 15 to my attention at the same time; sounded like there was
 16 a problem.
 17 **Q.** So what happened to the review?
 18 **A.** Well, I have difficulty in remembering. I think it went
 19 on past my departure.
 20 **Q.** Sorry, I missed that.
 21 **A.** I think it went on past my departure.
 22 **Q.** Can we go back then please to POL00158368. I think it's
 23 page 22. No, sorry. The next page. My apologies. So
 24 we've got the Michael Rudkin email we went to at the
 25 start at the bottom there. Then, if we go, if we can go

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1 **A.** Yeah.
 2 **Q.** It says:
 3 "Ruth, the attachment needs to be in email format,
 4 please -- Alan and I are out of the office and so need
 5 to view it on BlackBerrys.
 6 "Also, we need the original email; what was attached
 7 looked more like a PowerPoint of a press cutting."
 8 Do you recall what conversation you had with Paula
 9 Vennells about this email?
 10 **A.** I don't, actually, no, sorry.
 11 **Q.** Do you remember discussing anything to do with
 12 an investigation into these issues with Paula Vennells?
 13 **A.** I issued the investigation request down the sort of
 14 Operations line, if you see what I mean. So -- because,
 15 because I was seeing it as a technology issue. It was
 16 the reference to the Federation which meant I felt Paula
 17 should be in the loop, plus it was her branches, if you
 18 like, that we were dealing with questions from.
 19 **Q.** In your statement, you say at paragraph 101 that:
 20 "I gave notice of my resignation to Adam Crozier
 21 around late October or early November of 2009, and it
 22 was accepted."
 23 **A.** Yeah.
 24 **Q.** So around the time that you forwarded this email -- or
 25 sorry not you -- the email was forwarded to Paula

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1 Vennells?
 2 A. Yes, it would have been that sort of --
 3 Q. So do you think at that time you were -- you had
 4 resigned or were thinking about it?
 5 A. Well, it's embarrassing that I can't tell you the actual
 6 date but, I mean, I kept all the correspondence but
 7 I kept it for the seven years for the tax purposes and
 8 then binned it all. So I can't remember the exact date,
 9 but I would have said it was -- well, I can't say more
 10 than what I put in the statement, really. It was late
 11 October or early November that I went to see Adam, and
 12 said, "I'd like to resign". I said "I'd like to see out
 13 the financial year, because one of my criteria for
 14 success was would the business get back into profit, and
 15 we wanted the end of the year, and he asked me to not
 16 say anything until the New Year.
 17 Now, following that, I then realised that, if I said
 18 something at the beginning of the New Year, that
 19 Parliament would be in recess and Pat McFadden, who was
 20 the Minister, I was very supportive of, he'd worked
 21 quite closely with me so I rang Adam and said, "Can
 22 I tell Pat before Parliament recesses?" So I rang Pat
 23 McFadden in December and told him and then I told my top
 24 team on 4 January, so --
 25 Q. That was the public position, effectively, or

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1 would be my guess.
 2 Q. But does it imply that you were -- because she's
 3 requested this email with you in copy, does it imply
 4 that you were working on it together or discussing it
 5 together?
 6 A. Yes, I'm sure we would have done, but it --
 7 Q. So my question is, why, at this stage, were you
 8 discussing it with Paula Vennells?
 9 A. Well, for the reasons I said: this was an important
 10 issue and she needed to be aware of it.
 11 Q. I'll leave that.
 12 I'll move on. I'm going to go back in the
 13 chronology slightly as my last topic, on the IMPACT
 14 Programme. Do you recall what the IMPACT Programme was?
 15 A. Yes, yes.
 16 Q. So it was a major change to the accounting procedures,
 17 effectively?
 18 A. Correct, yeah.
 19 Q. Before the IMPACT Programme, subpostmasters would
 20 balance a cash account, correct?
 21 A. Yes.
 22 Q. Yes. That cash account would be completed at the end --
 23 well, not at the end, on a Wednesday on a weekly basis,
 24 yes?
 25 A. I couldn't have told you that, but it sounds right, yes.

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1 am I misunderstanding you?
 2 A. Yes, so it -- so it went public after -- I told the top
 3 team, then there was an internal communication, and we
 4 told the world, as it were, that I was going.
 5 Q. Standing back, why do you think you were on the
 6 6 November speaking about your email of 15 October with
 7 Paula Vennells?
 8 A. Why do I -- sorry, say that again?
 9 Q. Let's bring the email back up. POL00158368.
 10 A. I wasn't planning on leaving until the end of March,
 11 that's not how it transpired. So I -- me resigning
 12 wouldn't change my behaviour.
 13 Q. Can we go to page -- I think it's page 22. So we have
 14 the email at the bottom on 15 October 2009.
 15 A. Mm-hm.
 16 Q. Then at the top is Paula Vennells, 6 November, in which
 17 you're copied.
 18 A. Yeah.
 19 Q. It says:
 20 "Ruth, the attachment needs to in email format
 21 please -- Alan and I are out of the office ..."
 22 A. Yeah.
 23 Q. So it's implied the two of you are together?
 24 A. No, not necessarily. We didn't go out together much at
 25 all. No, we'd be in different parts of the network

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1 Q. Do you remember the change that came about because of
 2 the IMPACT Programme?
 3 A. I probably don't, to be honest. You have a point, but
 4 I'll --
 5 Q. Well, before the IMPACT Programme, if a subpostmaster
 6 balanced their books and had a discrepancy which they
 7 couldn't explain --
 8 A. Oh, this is the rolling forward the discrepancy?
 9 Q. -- they were able to ask for authorisation to put it in
 10 a suspense account?
 11 A. Yeah.
 12 Q. Correct --
 13 A. I've learnt this since, yes. I've learnt this by
 14 reading all the correspondence, yeah.
 15 Q. -- and then roll over into the next --
 16 A. Yeah.
 17 Q. -- trading period while it was investigated. Following
 18 the IMPACT Programme, rather than weekly, the
 19 subpostmasters had to balance every four or five weeks,
 20 yes?
 21 A. Yes.
 22 Q. If there was a discrepancy that they couldn't explain
 23 they no longer could keep it in a suspense account and
 24 roll into the next trading period, correct?
 25 They had to -- Post Office sought debt recovery from

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1 them at the end of the trading period or it could be
 2 settled essentially and paid off in due course?
 3 A. Mm, mm.
 4 Q. Could we turn please to POL00032147. This is a meeting
 5 on the -- board meeting, sorry, on 17th August. You'll
 6 see third line down, you're there as a Non-Executive
 7 Director?
 8 A. Yeah.
 9 Q. If we turn to page 7, please, if we could go down to the
 10 "IMPACT Programme", thank you. (b), it says:
 11 "The objective of the programme was to save costs,
 12 replace obsolete back office systems, improve branch and
 13 client accounting, improve debt recovery ..."
 14 When it says "debt recovery", from whom were those
 15 debts being recovered?
 16 A. From subpostmasters, Crown Offices, franchisees.
 17 I assume that's what it meant. I mean, this was -- we
 18 had a finance function in Chesterfield and, in my head,
 19 when we were in this meeting, this was new technology
 20 for Chesterfield which flowed out into the branches.
 21 Q. Yes, but the Board is effectively discussing how it can
 22 get improved debt recovery from maybe others, but from
 23 subpostmasters?
 24 A. Amongst other things, yes.
 25 Q. And --

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1 top, in (f), it says:
 2 "Planned completion of the new finance system was
 3 24 August 2005. A branch trading pilot would commence
 4 14 September, and full branch rollout was planned for
 5 30 November ..."
 6 Those words "branch trading pilot", branch trading,
 7 that's the specific terminology used for balancing and
 8 trading periods, isn't it?
 9 A. I would assume so, yes. Yes, it's probably -- there's
 10 probably a word missing. It might have been branch
 11 trading statement or something, I don't know, but --
 12 Q. In your statement -- we don't need to turn it up, but
 13 it's page 13, the top paragraph -- you refer to the
 14 IMPACT Programme. My understanding of your evidence is
 15 you weren't -- or your evidence is you weren't told that
 16 the ability to put discrepancies into the suspense
 17 account was taken away; is that --
 18 A. No, I didn't know that then, no.
 19 Q. Is your evidence it wasn't discussed at that Board
 20 meeting?
 21 A. Yes, I certainly don't recall it. I mean, I was then,
 22 in quotes, "just" a non-exec, so it was an item of
 23 detail which they probably felt they didn't need to
 24 share. Subsequent knowledge indicates that that was
 25 quite an important development, really.

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1 A. No, it is to save time in branches, as well, it was
 2 a very labour intensive process, so this was --
 3 Q. But this was for the benefit of Post Office Limited?
 4 A. And saves time in branches, which is of benefit to all
 5 branches. But it --
 6 Q. At (e), Mr Corbett speaks, it says, "The rollout was not
 7 expected to be 'noise free'", and one of the risks was
 8 concern regarding debt recovery. Do you remember what
 9 that concern was?
 10 A. No, I don't. I remember the higher call volumes. As
 11 I said, this was about the Chesterfield operation and
 12 that new procedures would generate a lot more phone
 13 calls from people coming to terms with, you know, the
 14 different procedures. As is often the case with these
 15 things, you introduce a labour saving device but there's
 16 a bump to get through when people are coming to terms
 17 with new procedures or different buttons to press on the
 18 system or whatever, that produces more activity, more
 19 mistakes for a while, and then things settle down.
 20 So I think what Peter was highlighting in general is
 21 this was quite material change, and there would be
 22 a disruption, as a result of it, and he then goes on to
 23 outline what risk mitigants he'd got in place to counter
 24 it.
 25 Q. If we can turn over the page, please, thank you. At the

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1 Q. Could we look, please, at POL00021419. It's a Risk and
 2 Compliance note. It's your apologies, because you're
 3 not in attendance?
 4 A. This the non-exec period yes, that's right.
 5 Q. Yes.
 6 A. Yes.
 7 Q. But you would have read the minutes?
 8 A. Yes, I would have hoped so.
 9 Q. Can we turn to page 5, please. It talks about the
 10 IMPACT -- the programme status, "several problems but
 11 workarounds are in place for servicing clients", and
 12 there were issues with system response times, mapping
 13 and systems.
 14 If we go down, please, to "3.4 Branch Audit
 15 findings", you've got:
 16 "Positive action has been taken through Branch
 17 Control since last year. This has reduced the incidence
 18 of 'suspense accounts' being abused to conceal fraud.
 19 However, there is an increase in the number of losses
 20 covered up by inflating cash figures. IMPACT will in
 21 the longer term improve MI here ..."
 22 What does "MI" stand for?
 23 A. Management information.
 24 Q. "... but short-term action is needed between teams
 25 involved in cash to improve the analysis and 'clean up'

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1 of data."

2 Was the board implementing the IMPACT Programme

3 precisely to avoid subpostmasters using the suspense

4 account?

5 **A.** No. That would be -- this was a major piece of

6 expenditure. This was about upgrading the financial --

7 I mean, obviously it was all initiated before I joined

8 but it was about equipping Chesterfield correctly to do

9 the finances and how that flowed through, you know, into

10 the branches of all types. So there was, there was

11 nothing -- that would have not been the motive.

12 **Q.** Did anyone, whenever you were in any discussion about

13 the IMPACT Programme, question how it would affect

14 subpostmasters?

15 **A.** I don't recall a conversation like that and, you know,

16 interestingly, the way I'm talking, I had this

17 impression it was more about computerising Chesterfield,

18 but not without consequence in branches because that's

19 where the money was coming from, but it wasn't the

20 objective, if you see what I mean.

21 **MR STEVENS:** Sir, that's my questions. If I may just take

22 a moment to confer with Ms Price on a matter?

23 **SIR WYN WILLIAMS:** Yes. *(Pause)*

24 **MR STEVENS:** Thank you, sir. I understand that two sets of

25 Core Participants wish to ask some questions. I'm told

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1 First page, please. Thank you. If we look, please, at

2 the very top of that document, we see it says:

3 "Post Office Limited Investigation Team Monthly

4 Report."

5 We get from that that you got these monthly.

6 **A.** Mm-hm.

7 **Q.** It says "Confidential", and it then goes on to say to

8 who it was written: POL ET -- let's move on from that

9 for the moment; Director Security Corporate; Head of

10 Investigations Corporate; Head of Criminal Law; Head of

11 Security Post Office Limited.

12 Let's just go through that. At that time, the Head

13 of Criminal Law was Rob Wilson, a solicitor; do you

14 remember him?

15 **A.** No, I don't, I'm afraid.

16 **Q.** No? What did you think the Criminal Law Team did within

17 the Post Office?

18 **A.** Well, it looks like it's at Royal Mail, isn't it? It

19 says Corporate Head.

20 **Q.** What do you think the Criminal Law Team did, Royal Mail

21 or Post Office?

22 **A.** Well, they would have been involved with these

23 prosecutions, I guess.

24 **Q.** Involved with the prosecutions?

25 **A.** Yes.

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1 that they will be five minutes each.

2 **SIR WYN WILLIAMS:** Okay, let them ask their questions, then.

3 **Questioned by MR STEIN**

4 **MR STEIN:** Mr Cook, my name is Sam Stein I represent a large

5 number of subpostmasters and mistresses, I am instructed

6 by Howe+Co.

7 Did you watch the evidence of Sir Michael Hodgkinson

8 yesterday?

9 **A.** I did, yes.

10 **Q.** You seemed to use the term "prosecuting authority",

11 which I assume you took from the evidence of Sir Michael

12 yesterday?

13 **A.** I did, yes.

14 **Q.** You understood the word prosecuting authority from his

15 evidence yesterday --

16 **A.** Yes.

17 **Q.** -- the term you used?

18 **A.** Yes.

19 **Q.** You are aware that later on in your term, as Managing

20 Director, that you were the Prosecution Authority for

21 the Post Office; is that correct?

22 **A.** Well, as I've already explained, but my view of that

23 changed during my time.

24 **Q.** Right. Well, let's have a quick look at that then,

25 please. Can we go to the document which is POL00048361.

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1 **Q.** Yes?

2 **A.** Yes.

3 **Q.** Right. So this document in 2006, in reference to you,

4 because you were part of looking at this sort of

5 material; head of Criminal Law, Rob Wilson, still

6 doesn't ring a bell?

7 **A.** No, it doesn't, I'm afraid. Sorry.

8 **Q.** Okay. The Investigation Team that clearly this is in

9 relation to, this monthly report, shall we have a quick

10 look at what's going on with that? Middle of the page

11 there, you see in the document we've got on the screen,

12 "Investigation Team Report Period 9 -- December 2006":

13 "The [principal] aims of the Investigation Team are

14 to stop criminal offences taking place, apprehend and

15 prosecute those who commit offences against us in order

16 to maximise our recovery and reduce loss to POL and its

17 clients through the identification of areas of weakness

18 throughout the business both operationally and within

19 our product offerings."

20 It does appear, on the face of this document, that

21 you've got information that there's a Criminal Law Team

22 that's operating within the business and, secondly,

23 an Investigation Team, with aims of stopping criminal

24 offences taking place, apprehending and prosecuting

25 people.

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1 A. Yeah, well look at item 1, it's all about postal order
 2 cashback offers and the fraud losses that we were
 3 experienced, as a result. That was nothing to do with
 4 subpostmasters. This --
 5 Q. What did you think when it refers --
 6 A. It's customer fraud.
 7 Q. What do you think --
 8 A. We call them "scams" today but, you know, this is what
 9 it was there for. There was -- there's always going to
 10 be lots of criminal activity around an organisation that
 11 creates a lot of money. That doesn't mean it's the
 12 subpostmaster's fault.
 13 Q. So you had reports in relation to subpostmasters that
 14 were being prosecuted --
 15 A. Mm-hm.
 16 Q. -- and that there was the involvement of
 17 an Investigation Team; is that correct?
 18 A. Yeah.
 19 Q. So you had oversight of an Investigation Team that
 20 investigated subpostmasters; is that correct?
 21 A. It is.
 22 Q. Right, and we can now see that there was a Criminal Law
 23 Team engaged as well, yes?
 24 A. Yes.
 25 Q. Right.

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1 A. Yeah, you're right, you're right, we did have the
 2 numbers in that report, yeah.
 3 Q. Then it goes on to say:
 4 "In total, 31 new investigation cases were raised
 5 during the period, with a current loss of £245,000."
 6 That's not the same as prosecutions, obviously but
 7 there were cases that were being looked at.
 8 Q. Next:
 9 "At present, the team is dealing with 248 ongoing
 10 investigations with a loss value of in excess of
 11 [£9 million] of these 80 are currently going through the
 12 courts."
 13 A. Yeah.
 14 Q. So you're getting these sorts of reports monthly, there
 15 were discussions involving the investigation operation,
 16 and discussions and information regarding cases being
 17 prosecuted and losses. You had all of the information
 18 that was possible to have, to actually have governance
 19 over this area, didn't you, Mr Cook?
 20 A. I had the relevant information there. I certainly --
 21 well, I've already said that I could have done more,
 22 but --
 23 Q. Well, then let's go over the page. We can see, at the
 24 bottom of page 2, it says:
 25 "Also provided is a summary of major enquiries

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1 A. But it's broader than just subpostmasters.
 2 Q. Well, let's just stay with subpostmasters for the moment
 3 because you may have noticed that this Inquiry is about
 4 subpostmasters.
 5 A. Yes, I have noticed that.
 6 Q. All right?
 7 A. I have noticed that.
 8 Q. Right, well let's then move on and have a look and think
 9 about what was happening to subpostmasters being
 10 investigated by the Investigation Team operating under
 11 your Managing Director directorial responsibilities,
 12 yes?
 13 A. Mm.
 14 Q. Okay? Did you, as an example, consider the numbers of
 15 cases that were being prosecuted?
 16 A. I didn't have the total number that was being pursued
 17 no.
 18 Q. Okay, let's go to the bottom of page 2, please, of the
 19 same document. Look, please, at 2.0.
 20 A. Yeah.
 21 Q. "Investigation Operations: This month's recovery figure
 22 is £63,000. Period 9 case raise figures for
 23 deficiencies at audit alone were £140K."
 24 Where it says "raise figures for deficiencies at
 25 audit", what did you think that meant?

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1 ongoing."
 2 Top of page 3, please, same document.
 3 We can see across there it looks like Excel
 4 documents that are being referred to, ignore the first
 5 one, "Over 100K Live cases", which appears to be no
 6 doubt a list of the cases worth over £100,000, all
 7 right?
 8 Then underneath that, you have then got references
 9 to 4.0, "Financial Investigations", as regards two Post
 10 Office branches.
 11 So the information you were getting was pretty
 12 comprehensive regarding the ongoing investigation and
 13 conduct of prosecutions as they've been going onwards
 14 under your time at the Post Office, wasn't it, Mr Cook.
 15 A. It was, but I -- I don't wish to let the impression be
 16 created that this was there to chase subpostmasters.
 17 This was there to chase fraud in general.
 18 Q. Okay, well, let's just say, as I've said before, we'll
 19 stick with subpostmasters, if you don't mind.
 20 A. Yes, but I need to make sure that context is understood.
 21 Q. Paragraph 59 of your statement --
 22 A. Thank you.
 23 Q. Yes, Mr Cook?
 24 A. I said thank you for acknowledging my comment.
 25 Q. Paragraph 59 of your statement, you say this:

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1 "To the best of my knowledge, the Risk and
2 Compliance Committee was not given any information or
3 reporting, nor did I have any oversight of the
4 prosecution of SPMs. As a result, I did not take any
5 steps as a member of the Risk and Compliance Committee
6 to ensure that POL was acting in compliance with its
7 legal obligations in relation to those prosecutions and
8 civil proceedings against SPMs. I was not aware they
9 were taking place."

10 It is just a straight out lie, isn't it, Mr Cook?

11 **A.** The point I was trying to make was about the initiation
12 of prosecutions. I have -- I have had repeatedly
13 acknowledged that there were cases under investigation
14 and that I was aware there were cases under
15 investigation.

16 **Q.** What you're saying in your statement is this: you did
17 not take any steps as a member of the Risk and
18 Compliance Committee to ensure that POL was acting in
19 compliance with its legal obligations in relation to
20 those prosecutions and civil proceedings against SPMs,
21 "I was not aware they were taking place".

22 Well, first of all you do agree you were aware they
23 were taking place --

24 **A.** Mm.

25 **Q.** -- and, secondly, in your statement you're pretending

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1 **A.** Mm.

2 **Q.** She'd been jailed on the lie, Mr Cook, that Horizon was
3 infallible. But you say you had no idea that these
4 prosecutions were being instituted in your name; is that
5 right?

6 **A.** No, well, I knew there were prosecutions.

7 **Q.** She pleaded guilty to false accounting only because
8 she'd been told that, if she did not, the Post Office
9 would prosecute and pursue her for theft.

10 **A.** Mm.

11 **Q.** She hadn't stolen a penny, Mr Cook. All of this was
12 being done in your name and yet you claim you didn't
13 know?

14 **A.** I just can't be more apologetic. It is -- it's --

15 **Q.** Mrs Skinner was the mother of two young children.
16 Wrongly accused of theft, she was told that if she
17 pleaded to false accounting as an alternative to that
18 baseless theft charge, she wouldn't go to prison. Now,
19 this was common practice by the Post Office: charge
20 theft and accept a plea to false accounting. Were you
21 aware of that stratagem, Mr Cook?

22 **A.** No, in fact worse than that, I -- when I had reports
23 about them and the individual had pleaded guilty, then
24 I thought we must have been in the right. I did not
25 appreciate that what was going on.

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1 that you weren't aware to avoid the implication, which
2 you needed oversight of the things?

3 **A.** No --

4 **Q.** That's simply not true, is it --

5 **A.** That was not my intention.

6 **Q.** Then why did you write that in your statement, Mr Cook?

7 **A.** Well, I believed it at the time, certainly.

8 **SIR WYN WILLIAMS:** Is that it, Mr --

9 **MR STEIN:** One moment.

10 Thank you, sir.

11 **SIR WYN WILLIAMS:** Right. Who is next?

12 **MR HENRY:** I am, sir. Mr Henry.

13 Questioned by MR HENRY

14 **MR HENRY:** Hello, Mr Cook, 17 years ago on 12 April 2007,
15 you were the Managing Director of the Post Office,
16 weren't you?

17 **A.** I was.

18 **Q.** You probably have no idea what you were doing that day,
19 I suppose?

20 **A.** No, I'm sure not.

21 **Q.** But Mrs Janet Skinner, who sits to my right, whom you
22 can see here, knows exactly what was happening to her
23 that day because on 12 April 2007 she was being released
24 from prison, having served a nine-month sentence for
25 false accounting.

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1 **Q.** So this stratagem was reinforcing your ignorance and the
2 general prejudice that these subpostmasters had their
3 hand in the till; is that right?

4 **A.** In the particular cases where the individual pleaded
5 guilty, I had assumed that they believed they were
6 guilty. It didn't occur to me at the time that that was
7 recommended to them by their lawyers for want of a --

8 **Q.** It was the most profound structural injustice.

9 **A.** Yeah, I agree.

10 **Q.** An unmeritorious charge of theft was being used as
11 a jemmy or sledge-hammer to force a plea or to crush
12 subpostmasters into submission.

13 **A.** I don't know if that was a deliberate strategy by the
14 Post Office but that's how it manifested itself and it's
15 unacceptable.

16 **Q.** It was a strategy and you ought to have been aware of
17 that strategy; do you accept that now, not with
18 hindsight, but what you ought to have known at the time?

19 **A.** I did not know that at the time -- I --

20 **Q.** Well, you ought to have known it at the time, Mr Cook;
21 do you accept that?

22 **A.** Yes, I do accept I ought to have known it. I didn't
23 know it. It would be nothing that I would ever
24 willingly want to do.

25 **Q.** Now, of course, it didn't do Mrs Skinner any good

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1 because she was sent to custody all the same, nine
 2 months' imprisonment. But before she was imprisoned,
 3 like so many subpostmasters, she'd suffered fictional
 4 Horizon shortfalls and had made 116 calls to the
 5 National Business Support Centre helpline complaining
 6 about balancing faults in the 18 months before she was
 7 dismissed, wrongly dismissed, Mr Cook --
 8 **A.** Yeah.
 9 **Q.** -- because your auditors thought she'd had her hand in
 10 the till. Are you proud of presiding over that culture?
 11 **A.** Definitely not, no.
 12 **Q.** Do you accept that the ultimate responsibility for her
 13 torment lay with you, as Managing Director of the Post
 14 Office?
 15 **A.** It did, yeah. I was the Managing Director so I was
 16 ultimately accountable. Whether I was aware is another
 17 matter and, if I wasn't aware, I should have been aware.
 18 **Q.** Right. But, as you have claimed, you maintain that you
 19 had no idea that these prosecutions were actually being
 20 instituted in your name?
 21 **A.** I'd no -- well, nearly correct. What I was saying was
 22 that I had no idea that the Post -- up until the
 23 Computer Weekly article, that the Post Office could
 24 initiate those without having to seek approval from any
 25 other party or body, so there was no moderating
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1 should have been on top of it and I wasn't. There's
 2 nothing more I can say. This will be with you for the
 3 rest of your life; it will be with me for the rest of my
 4 life.
 5 **SIR WYN WILLIAMS:** Thank you, Mr Henry.
 6 I've just got a few questions, Mr Cook.
 7 **A.** Yes.
 8 **Questioned by SIR WYN WILLIAMS**
 9 **SIR WYN WILLIAMS:** I'd like to go back to the instruction
 10 you issued to Mr McLean to carry out an investigation.
 11 **A.** Oh, yes, yeah.
 12 **SIR WYN WILLIAMS:** I use the word "investigation" just in
 13 a neutral sense. I'd like paragraph 79 on page 27 of
 14 your witness statement to be put up on the screen,
 15 please. It's WITN00190100. Thank you.
 16 Now, if you'd just like to refresh your memory by
 17 just scanning that for the moment.
 18 **A.** Yes, I have. I have, thank you.
 19 **SIR WYN WILLIAMS:** That's fine. Well, then these are my
 20 questions: you have told me that, in early May 2009,
 21 this possibility that there were a number of cases
 22 involving a challenge to Horizon came as a bit of a bolt
 23 out of the blue for you?
 24 **A.** Yeah.
 25 **SIR WYN WILLIAMS:** Yeah?
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1 influence. That is what I was not aware of.
 2 **Q.** Now, those prosecutions, the Court of Appeal Criminal
 3 Division stated, should never have been brought because
 4 they were an affront to the conscience of the court.
 5 What do you have to say for yourself about that, sir?
 6 **A.** Well, all I can do is repeat what I said at the
 7 beginning, is I just apologise unreservedly. I'm not
 8 the sort of guy that is malicious or would want to do
 9 harm to anyone but it was -- and I was not aware, but
 10 it -- that is not an excuse, it's an explanation.
 11 There's no excuse for the fact that this happened and it
 12 was on my watch. And, you know, this is what this
 13 Inquiry is about, is to establish how that could have
 14 happened and I've tried my honest best to portray
 15 exactly what I recall happening many, many years ago,
 16 and but it's not acceptable. It's not acceptable.
 17 **Q.** Finally, do you have anything by way of a personal
 18 direct apology that you would like to say to
 19 Mrs Skinner?
 20 **A.** I would. I would love to talk to her afterwards but you
 21 may not want to, but I can only apologise on behalf of
 22 the whole organisation for the way that you were
 23 treated. It was disgraceful. I can only apologise
 24 personally that, whilst I had not heard of your case,
 25 I am nevertheless -- I have an accountability that
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1 **A.** Yes.
 2 **SIR WYN WILLIAMS:** And your first reaction was to instruct
 3 Mr McLean to investigate and you did so because you
 4 thought highly of him --
 5 **A.** Yes.
 6 **SIR WYN WILLIAMS:** -- you say in your statement. But then,
 7 reading the rest of that paragraph, it seems to me at
 8 least, and this is what I want your help with, that this
 9 inquiry just petered out because what you say is:
 10 "I was assured at that time that the Horizon system
 11 was functioning normally [but] I do not recall the
 12 detailed of Mr McLean's investigation, nor have I been
 13 provided with any documents relating to the
 14 investigation by the Inquiry."
 15 Now, breaking that down, it may be that you're
 16 saying that either Mr McLean or someone on his behalf
 17 said to you orally "Everything is fine" but, apart from
 18 that, there doesn't appear to be any document or report
 19 or anything else that you have seen which actually gives
 20 us the result of Mr McLean's investigation; is that as
 21 you understand it?
 22 **A.** I agree, sir, yes. I wouldn't have settled for
 23 "everything's fine" but I haven't been able to --
 24 I haven't been given any history or documentation that
 25 shows what he produced. I can't remember what the
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1 response was but I wouldn't have been able to carry on
2 without, you know, an investigation and I think we saw,
3 during the course of my evidence, that there was still
4 quite a lot of activity going on some time later.

5 So I believe that was the moment that the
6 organisation started examining itself but, as we've come
7 to learn, there were many people that wanted to just
8 prove that it was okay, put it that way.

9 **SIR WYN WILLIAMS:** Yes, but my understanding is that you
10 didn't actually leave Post Office until early the
11 following year?

12 **A.** Yes, about the end of January. That's right. Yes.

13 **SIR WYN WILLIAMS:** So approximately seven/eight months after
14 you had instigated an investigation by Mr McLean?

15 Forgive me if this sounds critical, and perhaps it
16 is critical, but there doesn't appear to be any urgency
17 on your part to get an answer from him, if you allowed
18 eight months to go by?

19 **A.** Well, I think we've seen evidence of activity still
20 going on in October/November but I just -- you know,
21 I just cannot recollect seeing a final report and I'd
22 love to be able to say that but I'm only going to say
23 what I completely clearly remember.

24 **SIR WYN WILLIAMS:** Yes.

25 **A.** I am -- throughout this process, as documents have
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1 all right?

2 **A.** Mm.

3 **SIR WYN WILLIAMS:** Post Office instigated proceedings
4 against Mr Castleton for approximately -- the figure
5 doesn't matter -- but approximately £25,000, said to be
6 a shortfall as evidenced by data from Horizon.
7 Mr Castleton defended it on the basis that there was no
8 shortfall and this was all the fault of the computer,
9 all right?

10 **A.** Mm-hm.

11 **SIR WYN WILLIAMS:** It gradually it grew from being what
12 might be called a fairly conventional action for the
13 recovery of a debt into a potential large-scale argument
14 about whether or not Horizon was reliable; okay? And
15 this was all unfolding in the first eight/nine/ten
16 months of you being Managing Director, but none of this
17 got to you, from what you told me?

18 **A.** No, I mean the learnings from this are -- sorry, go on.

19 **SIR WYN WILLIAMS:** Anyway, so let me carry on. There came
20 a point in time when the very experienced barrister who
21 was acting for the Post Office told the experienced
22 solicitor who'd instructed him, who in turn told the
23 Legal Department of the Post Office, that the costs
24 involved in this case were grossly out of proportion to
25 what you were trying to get from Mr Castleton and they
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1 emerged, it fills in the picture for me, it helps me
2 remember. So I remember the story, I have difficulty
3 remembering the order and the dates. So I remember
4 moments. The Computer Weekly article was a moment,
5 right, that had a big impact on me, but I can't --
6 without evidence sort of being produced, I can't point
7 to what happened next, which is why I wrote the witness
8 statement as I did, because I can't claim something that
9 I can't remember.

10 **SIR WYN WILLIAMS:** But can I take it that you have no memory
11 of Mr McLean producing a written report before you left
12 your position as Managing Director?

13 **A.** I find that difficult to believe that there wasn't one,
14 but I can't remember it and I haven't seen anything.

15 **SIR WYN WILLIAMS:** All right. Thank you very much.

16 Now, sorry to prolong it, but there's one further
17 short series of questions about the case that was
18 referred to in the Computer Weekly article, and that's
19 the case of Mr Castleton. All right?

20 **A.** Yeah.

21 **SIR WYN WILLIAMS:** You'd said that you had no idea of
22 Mr Castleton's case, certainly the name Castleton, until
23 you read that article. I just want to ask you about the
24 process for making decisions when the Post Office was
25 involved in quite high profile, High Court litigation,
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1 ought to think seriously about whether it was worth
2 spending all that money, all right?

3 But, in the end, all that money was spent so that
4 the total amount of the debt and the costs came to well
5 over £300,000.

6 **A.** Yeah.

7 **SIR WYN WILLIAMS:** Well, what I want to ask you about is
8 what was the process, back in 2006, for authorising the
9 expenditure of those sums of money in the Post Office?

10 **A.** Yeah, and that was what I was about to prematurely talk
11 about. I mean, there's an irony, isn't it, that, if
12 somebody in the organisation wanted to buy a piece of
13 equipment, they'd probably have to get umpteen forms
14 signed in order to be able to spend the money and yet,
15 somehow or other, these spend decisions were being made
16 in that prosecution, and there should have been a set of
17 delegated authorities that said, "You're authorised to
18 spend up to this much money", and because one of the
19 issues is a case starts off -- as you've explained,
20 a case start off modest and becomes big, so not only
21 should they require sign-off from an expenditure
22 perspective, there should be a cap on how far it can go
23 without coming back and asking for more.

24 Clearly, that was not in place and -- and it
25 certainly -- they certainly did not come to me for
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1 approval. So we had delegated authorities in place that
 2 would allow people below me, and this would have
 3 probably lied with -- Paula Vennells as the Network
 4 Director, would have been able to sign that off.
 5 **SIR WYN WILLIAMS:** Right. So what it amounts to is that
 6 there would have been a person within the Post Office
 7 organisation who would have had authority to sign off --
 8 **A.** Correct --
 9 **SIR WYN WILLIAMS:** -- spending the money without taking it
 10 either to you or to the Board --
 11 **A.** Correct.
 12 **SIR WYN WILLIAMS:** -- and so did you tell me that most
 13 likely person was Paula Vennells?
 14 **A.** Yes, I think so.
 15 **SIR WYN WILLIAMS:** All right. Thank you very much.
 16 **A.** Of the legal function would have thought approval from
 17 the business and the business in this case would have
 18 been the person that ran the branches.
 19 **SIR WYN WILLIAMS:** All right. Thank you.
 20 **A.** Thank you.
 21 **SIR WYN WILLIAMS:** Thank you very much, Mr Cook for
 22 providing your witness statement, and for coming to give
 23 evidence to the Inquiry this morning. I'm grateful to
 24 you.
 25 **THE WITNESS:** Thank you. Thank you, sir.

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1 please, with your witness statement. The URN is
 2 WITN04390100. You should have a hard copy in front of
 3 you. It's 34 pages long, excluding the exhibits pages,
 4 and is dated 28 February 2024. If you turn to page 34,
 5 is that your signature?
 6 **A.** It is, yes.
 7 **Q.** Are the contents of it true to the best of your
 8 knowledge and belief?
 9 **A.** They are indeed.
 10 **Q.** Thank you. I'm not going to ask you questions about all
 11 elements of the witness statement, it stands as your
 12 evidence, and is being made available on the Inquiry's
 13 website. Can I start with your background, please.
 14 Between February 2003 and April 2010, so for just over
 15 seven years, you were a Director and Chief Executive
 16 Officer of Royal Mail Group --
 17 **A.** That's correct.
 18 **Q.** -- and a Director of Royal Mail Holdings --
 19 **A.** Yes.
 20 **Q.** -- the first being a limited company and the second
 21 a Plc?
 22 **A.** Yes.
 23 **Q.** Before joining Royal Mail, you held senior roles in
 24 Saatchi & Saatchi from 1988 to 1999; is that right?
 25 **A.** 1995 -- well, I started there in 1988, all the way

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1 **SIR WYN WILLIAMS:** So Mr Stevens, how are we proceeding
 2 next?
 3 **MR STEVENS:** I think Mr Beer's preference is to switch
 4 witnesses immediately, if we can, and make a start now.
 5 **SIR WYN WILLIAMS:** Certainly, by all means I'll sit here
 6 quietly until you do it, if you like.
 7 **MR STEVENS:** I'm sorry sir, we may need a short break. The
 8 transcriber needs a short break.
 9 **SIR WYN WILLIAMS:** Yes, sure. 12.35, ten minutes?
 10 **MR STEVENS:** Yes, that's fine. Thank you, sir.
 11 (12.25 pm)
 12 (A short break)
 13 (12.35 pm)
 14 **MR BEER:** Good afternoon, sir, can you see and hear me?
 15 **SIR WYN WILLIAMS:** Yes, thank you.
 16 **MR BEER:** May I call Adam Crozier, please.
 17 **ADAM ALEXANDER CROZIER (affirmed)**
 18 **Questioned by MR BEER**
 19 **MR BEER:** Good afternoon, Mr Crozier. My name is Jason Beer
 20 and I ask questions on behalf of the Inquiry. Can you
 21 tell us your full name, please?
 22 **A.** Adam Alexander Crozier.
 23 **Q.** Thank you very much for previously providing a witness
 24 statement to the Inquiry and for giving evidence today
 25 to assist us in our investigation. Can we start,

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1 through to 1999, yes.
 2 **Q.** Yes, I think that's what I said, '88 to '99 --
 3 **A.** Sorry.
 4 **Q.** -- but the last four years as a Joint Chief Exec?
 5 **A.** Correct.
 6 **Q.** Then you served until 2003 -- ie immediately before
 7 joining the Royal Mail Group -- as the Chief Executive
 8 of the Football Association?
 9 **A.** Correct.
 10 **Q.** Can I start, please, looking at the corporate structure
 11 of Royal Mail, and I'm going to try and summarise and
 12 see whether you agree, in the interests of time, with
 13 the summary. First, there was a parent company, Royal
 14 Mail Holdings Plc?
 15 **A.** Yes.
 16 **Q.** That was wholly and directly owned by the single
 17 shareholder, the Government?
 18 **A.** Yes.
 19 **Q.** Royal Mail Holdings Plc had its own board?
 20 **A.** Correct.
 21 **Q.** It had its own Management Board?
 22 **A.** Correct.
 23 **Q.** You attended all Royal Mail Holdings Plc Board meetings
 24 and you sat on the Management Board?
 25 **A.** That's correct.

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1 Q. The Chairman of Royal Mail Holdings Plc, in your tenure,
 2 was firstly Allan Leighton, between 2002 and 2008; is
 3 that right?
 4 A. That's correct.
 5 Q. Then Donald Brydon from 2009 onwards?
 6 A. Yes.
 7 Q. Royal Mail Holdings Plc's Board, I'm going to call that
 8 the main board, the main board had its own Audit and
 9 Risk Committee --
 10 A. Yes.
 11 Q. -- upon which you sat?
 12 A. Yes, attended, yes.
 13 Q. Yes, were you a member of it or were you an attendee?
 14 A. I think I was an attendee, actually.
 15 Q. Just for those not steeped in corporate governance, the
 16 difference between being a member of a Committee and
 17 an attendee is?
 18 A. I think the members were all Non-Exec Directors.
 19 Q. Can we move on in the summary. There were a range of
 20 separate businesses within the Royal Mail and they were
 21 separated out in different ways, some of them being
 22 subsidiaries of Royal Mail, and others not; is that
 23 right?
 24 A. Yes.
 25 Q. Post Office Limited was one of those entities and that

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1 A. Yes.
 2 Q. The Post Office Limited had its own Risk and Compliance
 3 Committee?
 4 A. That's right.
 5 Q. Now, I think, in one way or another, I've taken all of
 6 those points from your witness statement; you make all
 7 of those points in one way or another in your witness
 8 statement. Taking all of those points together, are you
 9 effectively saying, in your witness statement, that
 10 within Royal Mail Holdings Plc's group of separate
 11 business units, the Post Office had a relatively high
 12 degree of autonomy from Royal Mail Group?
 13 A. Yes, under its delegated powers of authority.
 14 Q. Of the business units within the Group, did the Post
 15 Office enjoy the greatest level of autonomy?
 16 A. Yes, it did. It was the only one with its own
 17 governance set-up.
 18 Q. I missed the last word, the only one with its own
 19 governance set-up?
 20 A. Set-up, yes, sorry.
 21 Q. Why was it that it enjoyed the greatest level of
 22 autonomy from Royal Mail?
 23 A. I think it was -- it goes right back to when -- the 2000
 24 Act, the Postal Act, where the Government set up the
 25 company and it had two very different objectives. For

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1 was a separate legal entity; is that right?
 2 A. That's correct.
 3 Q. That was Post Office Limited?
 4 A. Yes.
 5 Q. Post Office Limited had its own board?
 6 A. It did.
 7 Q. It had its own Chairman?
 8 A. It did.
 9 Q. In your tenure, they were Sir Michael Hodgkinson, from
 10 whom we heard yesterday, and then from 2009, Donald
 11 Brydon?
 12 A. That's right.
 13 Q. I think that means that Mr Brydon, from 2009, was
 14 Chairman of both Royal Mail Holdings Plc and Post Office
 15 Limited?
 16 A. Yes, he was.
 17 Q. The Post Office had its own Managing Director or CEO,
 18 the title changed?
 19 A. That's correct.
 20 Q. In your tenure, that was David Mills, from whom we hear
 21 next week, and then, from 2006, Alan Cook from whom we
 22 have just heard?
 23 A. Yes.
 24 Q. That person, the MD or the CEO, sat on both the Royal
 25 Mail Holdings Plc and the Royal Mail Management Board?

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1 Royal Mail it was to be modernised and be a commercial
 2 company in a market that was to be opened up to
 3 competition and, on the Post Office side, it was to try
 4 to become a sustainable public service, so two very
 5 different objectives, and that separate governance ran
 6 right through to them also having their own direct
 7 relationship with the shareholder and, within the
 8 Shareholder Executive, a different team within that
 9 team.
 10 Q. Thank you. Was the result of that that you, as CEO of
 11 Royal Mail, placed very substantial reliance on the Post
 12 Office Board and the Post Office Executive Team in the
 13 running of Post Office Limited?
 14 A. I did indeed, and it's partly why both the Chairman and
 15 the CEO of the Post Office also sat on the Holdings
 16 Board, the Chairman of Royal Mail sat on the Post Office
 17 Board and the other piece of glue was the Company
 18 Secretary who sat on both. But what it did mean,
 19 through those delegated authorities, was that the Post
 20 Office largely was able to go about its business,
 21 without reference to the Royal Mail Board, other than on
 22 two really key things: one was on funding, which
 23 fundamentally impacted on the solvency of the whole
 24 group; and, secondly, on certain major, multi-year
 25 contracts where it took it beyond its delegated

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1 authority limits.

2 Q. I think later we'll come on to the fact that the Fujitsu

3 contract was one of those?

4 A. It was indeed, yes.

5 Q. Looking back now, do you think there should have been

6 maybe a third added to the list of things that the Post

7 Office ought to have come back to Royal Mail Holdings

8 more and more frequently on, namely the conduct of

9 investigations and criminal prosecutions?

10 A. Not at the time, no. I certainly thought that all the

11 correct checks and balances were in place, both in terms

12 of internal and external audit, in terms of internal and

13 external legal advice, there was the POL Risk Committee,

14 the POL Exec Committee and the POL Board and, through

15 all those checks and balances, I think there was some

16 confidence that things were working and, certainly, no

17 one in that chain at any stage expressed any concerns

18 about the conduct in the area you've just mentioned.

19 Q. If Royal Mail and you within Royal Mail was reliant on

20 the Post Office to represent Post Office matters,

21 whether in the Management Board or the main board of

22 Royal Mail, if they did not raise or mention any issues

23 to you of concern or which were problematic, was there

24 any mechanism by which you and Royal Mail could find out

25 about such issues?

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1 up a properly functioning internal audit unit, which was

2 of course one of the ways that we could also find out

3 what was happening elsewhere in the group, and we

4 strengthened that. We created a whole risk agenda in

5 the business, where we got, from the ground up, people

6 to let everyone know what their key risks were. They

7 looked at that risk register, that risk register was

8 debated at the executive --

9 Q. Just stopping you there --

10 A. Of course.

11 Q. -- can you recall whether the conduct of prosecutions

12 and the possibility of bringing subpostmasters to

13 justice, including by imprisoning them, and the issues

14 that arise when conducting prosecutions, was on the

15 Royal Mail Holdings risk register?

16 A. I don't believe so and I don't believe I recall seeing

17 it on the Post Office register, no.

18 Q. Is that a failing?

19 A. With the benefit of hindsight, yes.

20 Q. Ie conducting an activity which is unusual for the

21 company, would you agree?

22 A. Yes.

23 Q. An activity that, of itself, carries unusual risks?

24 A. Indeed.

25 Q. Would you agree that that unusual activity would require

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1 A. Of course. Well, of course there was the structure

2 I just mentioned of all the checks and balances, which

3 I won't go through again --

4 Q. But the checks and balances you mentioned were within

5 the Post Office?

6 A. They were, but on top --

7 Q. I'm talking about the checks and balances in you

8 learning about things that they didn't want to tell you

9 about?

10 A. Yeah, well, first of all, there were constant one-to-one

11 meetings with the CEO of the Post Office.

12 Q. Just stopping you there, Mr Crozier, does that place

13 a high burden on the Managing Director or CEO of Post

14 Office Limited to be open and transparent with Royal

15 Mail Holdings and, in particular, with you? So --

16 A. Both myself and the Board, yes, absolutely. You know,

17 there was constant -- the whole company, because of what

18 we inherited, effectively, on the Royal Mail side,

19 a broken company that hadn't been invested in for

20 a decade, hadn't hit its quality of services, was the

21 least modernised postal company in Europe, what that

22 meant was, on the Royal Mail side, there was no option

23 other than to be fundamentally transparent in the fact

24 that most of what we inherited wasn't working.

25 And that encouraged a lot of transparency and we set

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1 a different type of supervision and oversight because it

2 brings the company into contact with the criminal

3 justice system?

4 A. Yes, and that's why there were lots of checks and

5 balances around the internal and external legal advice,

6 and it's --

7 Q. Sorry, say that again? That's why there were lots of

8 checks and balances around the --

9 A. Internal and external legal advice.

10 Q. What do you mean by that?

11 A. Well, we had lots of external lawyers involved with the

12 company. We also had prosecutions on the Royal Mail

13 side, as I'm sure you know, and there, there were

14 multiple interactions, much more straightforward things

15 with police and Crown Prosecution Services.

16 Q. What external lawyers are you referring to that gave

17 comfort in the prosecution of subpostmasters?

18 A. I don't recall which ones the Post Office used at the

19 time, I'm sorry.

20 Q. Did you think at the time that prosecutions of

21 subpostmasters were conducted by external lawyers?

22 A. I believe they had a big role in that, yes.

23 Q. By "conducted", do you mean the person standing up in

24 court, ie the barrister or employed barrister or

25 a solicitor with rights of audience, or do you mean

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1 conducted the whole thing?

2 **A.** I am not sure.

3 **Q.** Okay. Was there a way for people within the Post Office

4 to report issues to you or to the Royal Mail Board if

5 the Post Office MD or CEO was not inclined to do so?

6 **A.** Yes, through a function called -- well, we had

7 whistleblowing in operation and we also -- which we

8 constantly updated and tried to improve, and we also had

9 a survey called Have Your Say, which was entirely

10 anonymous and allowed people to effectively give us

11 whatever feedback they thought would be helpful.

12 **Q.** Was that effectively a department or a business

13 function, both of those things?

14 **A.** A team ran both of those things, yes, and two different

15 teams, actually.

16 **Q.** How were the complaints or issues raised from that fed

17 through to you, if at all?

18 **A.** The Have Your Say results, initially they were done

19 annually, we then moved to doing them every month,

20 a section every month and those were reviewed by the

21 business units, by the Management Team, by the Audit

22 Committee and, indeed, by the Board.

23 **Q.** In each of those three cases within Royal Mail, rather

24 than Post Office doing it?

25 **A.** Well, I think they did their own when it was reviewed by

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1 in March or April 2006, and partly -- well, in fact,

2 only because those two meetings were very strongly about

3 the latest negotiations with Government around the

4 subsidy to ensure that we were able to sign the company

5 off as a going concern.

6 **Q.** You say in your statement -- no need to turn it up, it's

7 paragraph 27 -- that you attended those meetings because

8 they were in relation to matters of shared interest.

9 **A.** Yes.

10 **Q.** So why was it that you attended two board meetings of

11 the Post Office Board in your seven and a bit years as

12 CEO?

13 **A.** For a number of different reasons. Number 1, when

14 I arrived, the CEO of the Post Office was David Mills,

15 who reported directly to Allan Leighton, the Chair of

16 Royal Mail. So I was not involved in the running of the

17 Post Office. That was a direct line relationship. And

18 when it switched to Alan Cook, Alan had a slightly more

19 normal dual reporting, which was obviously to the Board

20 of the Post Office and the Chairman of the Post Office

21 on the one hand, and then to me with regards to how Post

22 Office interfaced with the Royal Mail Group, for

23 instance funding or the commercial relationship between

24 the two companies.

And I was advised by the Company Secretary that it

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1 their business units, so I'm assuming they did that with

2 theirs. I'm not sure, I genuinely can't recall,

3 whether -- Have Your Say for the Post Office obviously

4 covered all the people who worked for the Post Office as

5 personnel, and that would include people in the Crown

6 Offices. They often talked about doing a separate one

7 for the agents but I'm not -- or the subpostmasters.

8 I'm not sure if they ever did that or not. I genuinely

9 can't recall.

10 **Q.** But I've taken from your evidence there that that was,

11 in each case, a Post Office-run function --

12 **A.** Yes, it was, yes.

13 **Q.** -- and the results of it were looked at analysed by the

14 Post Office?

15 **A.** Correct, and then on to the Post Office Board.

16 **Q.** I'm looking for something that jumped from the agents,

17 as you called them, the subpostmasters, to you and your

18 Board. Was there a facility to do that, without going

19 through either of those mechanisms that the Post Office

20 managed?

21 **A.** I don't believe there was, no.

22 **Q.** I think it's right that you made limit appearances at

23 Post Office Limited Board meetings; is that right?

24 **A.** I think it was two, which were both in between David

25 Mills leaving at the end of 2005, and Alan Cook arriving

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1 was -- that both the shareholder and the Board wanted

2 the two things kept separate and, therefore, I shouldn't

3 be on that Board.

4 **Q.** We've spoken about the responsibility on Post Office

5 Executive Team and its Board to refer things up to Royal

6 Mail Management Board and the main board, were there any

7 mechanisms for other main board members or Management

8 Board members to, as it were, go down into the Post

9 Office Board to take a look at what was going on?

10 **A.** Yes, there were. So because what we were trying to do

11 was a very big people and cultural transformation and,

12 certainly on the Royal Mail side, a huge technology

13 revolution in terms of putting in sorting machines and

14 tracking and tracing for parcels, and what have you,

15 very unusually, we had our Group HR Director on the

16 Board of the Royal Mail, and the Group Technology

17 Director on the Board of the Royal Mail, and obviously

18 those also had tentacles into the Post Office in terms

19 of people and technology.

20 Equally, Allan Leighton, who was Chair of Royal

21 Mail, was also on the Post Office Board, and the Company

22 Secretary, Jonathan Evans, was Company Secretary on the

23 Royal Mail Board and attended all the POL Boards as

24 well.

25 **Q.** So were the principal links between the two through

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1 Mr Leighton and Mr Evans?
2 A. Correct.
3 Q. Can we look, please, at POL00362335, page 20, please.
4 Can we rotate it, please, 90 degrees clockwise.
5 We can't, I'm told.
6 I can't date this because it comes within a loosely
7 assembled pack of papers --
8 A. Right.
9 Q. -- and it's not dated itself. But, given it's got the
10 Chairman of the Plc as Allan Leighton, and David Mills
11 as CEO of Post Office, it must be before 2006, right?
12 A. Yes.
13 Q. As we see at the top, the Chairman is Allan Leighton.
14 The deputy chairman, Elmar Toime --
15 A. Yes.
16 Q. Off to the left, the Company Secretary of Royal Mail
17 Holdings is Jonathan Evans.
18 A. Mm-hm.
19 Q. The Chief Executive of Royal Mail, you. Then a line
20 round to company-wide functions from you?
21 A. Yes.
22 Q. Then two direct responsibilities, Parcelforce Worldwide
23 and Logistics to you, yes?
24 A. Yes.
25 Q. Then on the right-hand side, we see -- sorry, we should

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1 a better phase -- a first among equals so was
2 effectively the lead executive.
3 Q. So this diagram represents or should be taken to
4 represent issues arising from David Mills, the Chief
5 Executive of the Post Office, coming through you?
6 A. No.
7 Q. No?
8 A. No, not at all. No. As I said, he reported directly to
9 Allan Leighton.
10 Q. What does the line above the Chief Executive, Post
11 Office Limited, David Mills, that comes up and goes
12 across the page and comes back down to you, mean?
13 A. I think that's just the way these things are drawn.
14 It's -- it -- very clearly, all three of us directly
15 reported individually into Allan Leighton.
16 Q. So we should take this to mean that you, at this time,
17 had no role; you're on the opposite side of the
18 diagram --
19 A. Correct.
20 Q. -- and nothing in relation to the Post Office passed
21 through you or, indeed, any other part of Royal Mail
22 Holdings, except insofar as it went straight to the
23 Chairman?
24 A. Correct.
25 Q. Thank you. That can come down.

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1 have worked our way across the business unit,
2 Parcelforce, Logistics, Royal Mail Letters, GLS, Royal
3 Mail International and then, on the right-hand side,
4 Post Office Limited.
5 A. Yes.
6 Q. That has obviously David Mills as the Chief Executive at
7 this time. It has a line into, I think, Allan Leighton,
8 the Chairman of Royal Mail Holdings Plc; that would be
9 correct, wouldn't it?
10 A. That would be correct, yes.
11 Q. Not to the Deputy Chairman?
12 A. No.
13 Q. That would be correct?
14 A. Yes.
15 Q. Not into Jonathan Evans?
16 A. No.
17 Q. That's correct as well, is it?
18 A. Also correct, yes.
19 Q. Then, I think, the line goes across to you; would that
20 be correct?
21 A. In the sense that I reported in to Allan Leighton, yes.
22 Q. I see.
23 A. Yeah. So all three, myself, Elmar and David, all
24 reported indirectly to Allan and Elmar, as the Executive
25 Deputy Chairman, was in effect -- I can't think of

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1 Is that a reflection of the great autonomy that the
2 Post Office enjoyed?
3 A. Yes.
4 Q. You told us a moment ago that you think you attended two
5 meetings of the Post Office Board. When you didn't
6 attend, did you receive minutes of the Post Office
7 Board?
8 A. Yes, the Royal Mail Holdings Board received minutes from
9 each of the operating companies -- were included in the
10 board pack.
11 Q. You said Royal Mail Holdings received them. Did you
12 personally receive the minutes of the Post Office Board?
13 A. Yes, as a Director of Royal Mail Holdings, yes, sorry.
14 Q. Did you receive the minutes of the Post Office Limited
15 committees?
16 A. No, I don't think we did. I think --
17 Q. I'm thinking in particular of the Audit and Risk
18 Committee?
19 A. The Audit and Risk Committee, I think if there was
20 a poor audit that went to the Royal Mail Audit Committee
21 meeting, for further looking and work, I'm not sure if
22 they always received the minutes of the Risk Committee,
23 no.
24 Q. You personally didn't always receive the minutes of the
25 Post Office Limited Audit and Risk Committee?

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1 A. I definitely did not, no, as far as I recall, I don't
 2 think.
 3 Q. So can we look at an example of the meeting of the Post
 4 Office Limited Board that you did attend?
 5 A. Yes.
 6 Q. POL00021492. We can see that it's Post Office Limited
 7 Board Meeting, 20 April 2006.
 8 A. Yes.
 9 Q. We can see those who are members of the Committee who
 10 are present and we can see in attendance, second down,
 11 is you?
 12 A. That's correct, yes.
 13 Q. Can we look, please, at page 4. We can see that the
 14 solvency of the Post Office was being addressed?
 15 A. Yes.
 16 Q. Does that reflect the point that you made earlier, that
 17 the very financial viability and existence of the Post
 18 Office was of a critical concern to you?
 19 A. It was, and it didn't just impact the Post Office but,
 20 obviously, because of its scale, it impacted the
 21 solvency of the Group as a whole, and the Group's
 22 ability to sign its accounts as a going concern.
 23 Q. Mr Corbett is recorded as outlining the company's
 24 current financial position in further detail. It was
 25 clear that the company was insolvent and that, in the

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1 If you just read that to yourself. Then under (c),
 2 an issue of the network resilience was raised.
 3 Am I right in thinking that you would have picked
 4 these things up, in a sense, by chance because you were
 5 at this meeting?
 6 A. That's correct.
 7 Q. Save for picking things like this, which are about
 8 Horizon and network resilience, up by chance, were you
 9 entirely reliant on the information pushed up the line
 10 to you, whether from the MD or CEO of the Post Office,
 11 or from the Company Secretary?
 12 A. Yes, or if anything was brought to my attention by the
 13 Group Technology Director.
 14 Q. How would that occur?
 15 A. He -- the IT Director in the Post Office would have
 16 reported to the CEO of the Post Office. That was a --
 17 sorry, it's management speak, but a hard line
 18 relationship.
 19 Q. Yes.
 20 A. But the Group Technology Director who was largely
 21 focused on driving through this automation and
 22 modernisation of Royal Mail was also there for advice
 23 and help to the Post Office Technology Team if required.
 24 Q. So, if, as we now know there to be the case, there were,
 25 putting it neutrally, issues with the Horizon

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1 absence of support from its parent company or ultimate
 2 shareholder -- that's the Government --
 3 A. Correct.
 4 Q. -- it would be unable to meet its debts as they fell due
 5 over the foreseeable future.
 6 It was reported to the Board that the Government had
 7 agreed in principle, with the support of Royal Mail, to
 8 write a letter to the company, under which the
 9 Government acknowledged the solvency issues facing the
 10 directors of the company and directors were prepared to
 11 continue trading on a going concern basis only on the
 12 basis of the following support.
 13 If we scroll down, we can see that it's set out.
 14 A. Yeah.
 15 Q. So was that why you were attending this meeting --
 16 A. It was, yes.
 17 Q. -- because it's a solvency of the Post Office issue,
 18 which, in turn, affects the accounting and potential
 19 viability of Royal Mail Group?
 20 A. Indeed.
 21 Q. Can we go on, please, to page 10. If we scroll down,
 22 please, we can see there's an Operations Report, and
 23 a document will have been produced, and then it's
 24 summarised, the "Horizon S90 Release". There's a four
 25 point explanation of what the Horizon S90 release was.

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1 technology, would you have expected, or was the system
 2 that the POL IT structure, the Post Office IT structure,
 3 would have pushed those issues up for your attention and
 4 for the Royal Mail Group Board's attention through the
 5 Group IT Director route?
 6 A. First of all, I don't recall the POL IT team ever doing
 7 that. That's the first thing to say. Second of all,
 8 I would have expected them to raise it with the POL
 9 Executive Team, first of all, that was the reporting
 10 lines; they were running and controlling the Post Office
 11 and they had responsibility for Horizon. If they needed
 12 some technical expertise, yes, I would have expected
 13 them to speak to the Group Technology Director, but if
 14 there were any real issues, that was why both the CEO of
 15 Post Office and Chairman of Post Office were on the
 16 Group Board -- was to enable them to have a direct line
 17 to relay any issues in Post Office to the rest of the
 18 board.
 19 Q. In paragraph 11 of your witness statement, which is on
 20 page 4, if we can turn that up, please --
 21 paragraph 11 -- you say, whilst you've tried to address
 22 as best you can your recollection of the corporate
 23 structure:
 24 "... I must stress that my responses are not in any
 25 way intended to detract from the fact that it is clear

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1 to me now that this structure did not help facilitate
2 vital information regarding Horizon and the conduct of
3 criminal proceedings reaching me or the board of Royal
4 Mail as it should have done."

5 There is no need to turn it up but you make
6 precisely the same point in paragraph 98.1 of your
7 witness statement on page 33.

8 Before getting into the detail, can we address first
9 what you say is clear to you now but was not clear to
10 you presumably at the time. Firstly, what in the
11 corporate structure prevented or did not facilitate
12 vital information from reaching you and the Board?

13 A. I think it was -- if I may expand a little, I think it
14 was -- this is a reflection, trying to help, in the
15 sense of what could have gone wrong here. I should
16 stress, at the time, actually it made perfect sense to
17 me because the two companies had been set up with such
18 a different objective, one in an entirely commercial
19 market, one really trying to become a sustainable public
20 service; and one that needed to modernise at enormous
21 speed, as it opened up to competition, and the other one
22 that absolutely had difficult issues in terms of
23 managing the size of the network, but largely through
24 the same business, if you like, as it had previously
25 had, albeit with less Government revenue and more

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1 structure to the provision of information to Royal Mail?

2 A. I think just because, internally, it was very clear that
3 people worked for the Post Office or the rest of the
4 Group, I think it just generated that sense of two
5 different companies, and I think the structure just,
6 again, benefit of hindsight, I think it didn't allow for
7 the easy flow of information.

8 Q. What was the vital information about Horizon which the
9 structure of the companies prevented you from being told
10 about?

11 A. As far as I recall, I don't remember anyone in the Post
12 Office governance system, whether that's the Board, the
13 Risk Committee, the Exec Team, the General Counsel, the
14 Legal Teams, most importantly the Operations and IT
15 Teams who owned Horizon, I don't remember any of those
16 people flagging up any concerns in that system.

17 Q. What --

18 A. I don't know whether they flagged it internally but it
19 never reached the Holdings Board.

20 Q. What was the vital information about the conduct of
21 criminal proceedings which the structure prevented you
22 from being told about?

23 A. I think for me, I'm not a lawyer, obviously, but it's
24 clear to me that, central to all of this, is the issue
25 of disclosure. I noted more recently the judgments of

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1 financial services revenue.

2 I think the issue, looking back, that I could see,
3 that was unhelpful was actually one in the way in which
4 it impacted on the two attitudes or cultures of the two
5 companies, which is that, in Royal Mail, because
6 everything, as I said earlier, was fundamentally broken,
7 everyone on the Board was aware of that. The starting
8 position was everything didn't work and, therefore,
9 there was no option but total, utter transparency
10 because if anyone had brought a presentation saying
11 everything is fine, they wouldn't have been believed.

12 So it was all about getting everything out on the
13 table, transparently dealing with it and trying to make
14 progress.

15 I worry, with the benefit of hindsight, that,
16 because POL didn't have that same burning bridge, for
17 want of a better phrase, that that same transparency
18 didn't allow information to flow up through that
19 governance system on its own and that, potentially, the
20 separation of the two aided and abetted people not
21 getting at that information.

22 Q. Here, you point to the corporate structure prevented or
23 didn't help facilitate. What about the corporate
24 structure, rather than the culture within each
25 organisation? What acted as a bar in the corporate

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1 the Appeals Court and, clearly, there were some material
2 deficiencies with the disclosure process. That seems
3 very, very clear.

4 Q. What was it about the structure that prevented or did
5 not help facilitate information about the conduct of
6 criminal proceedings from reaching you? We're going to
7 come on to it after lunch but the proceedings were
8 instituted, pursued and completed by a Legal Team that
9 sat within Royal Mail Holdings, not the Post Office.

10 A. Yeah, working with the Post Office team, and I don't
11 recall the Company Secretary, Jonathan Evans, who had
12 responsibility for that area, talking about that at any
13 of the Holdings Board meetings.

14 Q. That's a separate issue, Mr Crozier, whether in fact he
15 talked about it. What was it about the structure that
16 did not help facilitate, as you say, information about
17 the conduct of criminal proceedings reaching the Board
18 of Royal Mail?

19 A. I'm not sure I mentioned anything about the structures
20 specifically with regards to that question.

21 Q. It's this sentence here that's on the screen:

22 "... it is clear to me now that this structure did
23 not help ... vital information regarding ... the conduct
24 of criminal proceedings reaching me ..."

25 What about the structure prevented information about

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1 criminal proceedings reaching you or the Board.
2 **A.** I think I was meaning more with regards to the Horizon
3 than the proceedings themselves.
4 **MR BEER:** Sir, that's an appropriate moment to break, if we
5 may. It's quarter past now. I wonder whether you'd
6 mind breaking until 2.05.
7 **SIR WYN WILLIAMS:** Yes, that's fine.
8 **MR BEER:** Thank you very much.
9 (1.16 pm)
10 (The Short Adjournment)
11 (2.05 pm)
12 **MR BEER:** Sir, good afternoon can you see and hear us?
13 **SIR WYN WILLIAMS:** Yes, I can. Thank you.
14 **MR BEER:** Good afternoon, Mr Crozier. Can I pick up where
15 I left off.
16 **SIR WYN WILLIAMS:** Before you do, I understand that you
17 would like me to sit until 3.45 this afternoon, which
18 I'm prepared to do but, at about 3.00, I'd like you to
19 check with the transcriber whether or not she needs
20 a break or whether we can go on until 3.45 without
21 a break.
22 **MR BEER:** Thank you, sir. I'll do that.
23 Mr Crozier before lunch, you spoke about the
24 autonomy that the Post Office enjoyed from Royal Mail.
25 Was it not patent or obvious from the structure of the

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1 external audit or review of the Post Office's
2 prosecutorial function?
3 **A.** I don't believe so, no.
4 **Q.** Are you aware of any form of internal audit of the Post
5 Office's prosecutorial function in your seven-year
6 period?
7 **A.** I don't recall.
8 **Q.** Can I start by looking at the responsibilities of
9 a director of a business or of a CEO; would those duties
10 include a director's duty to the accuracy of accounting
11 information and accounting records?
12 **A.** Yes, it would.
13 **Q.** Taking it shortly, is it right that company law requires
14 directors to prepare accounts for each financial year
15 which give a true and fair view of the state of affairs
16 of the company and, indeed, of a group, if it's within
17 a group, and of the profit and loss of the group for
18 that relevant period?
19 **A.** That's correct, yes.
20 **Q.** Does a director have to have confidence in the figures
21 being produced in respect of a business's profit and
22 loss before they can take a definitive view on the
23 financial statements of the business?
24 **A.** Yes, they do.
25 **Q.** If there are any doubts about the integrity of the

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1 organisation and the autonomy that the Post Office
2 enjoyed, that there was a significant risk for issues
3 that the Post Office did not wish to raise with Royal
4 Mail to go unnoticed by Royal Mail?
5 **A.** That was the purpose of ensuring that the Chief
6 Executive, the Chairman and the Company Secretary of
7 Post Office were on the Royal Mail Holdings Board as
8 I understand it. That was a decision before I arrived.
9 Of course, we built up a strong internal audit function,
10 which was able to go anywhere in the company, and their
11 audit plan was checked by the Holdings Board, the Audit
12 Committee and the Exec Team. And also there was
13 external audit, who similarly were involved in the --
14 right across the company and, again, had the ability to
15 go anywhere and look at anything, and I met regularly,
16 and privately, with internal audit and external audit,
17 and was able to check privately whether there were any
18 concerns that they had.
19 **Q.** In your seven years, are you aware of any external audit
20 of the Horizon system?
21 **A.** External, do you mean external in terms of Ernst &
22 Young, as in financial auditors, sorry?
23 **Q.** No, any form of out of the Horizon system?
24 **A.** No, I don't think I am no.
25 **Q.** In your seven years, are you aware of any form of

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1 figures which are produced in the accounts of
2 a business, that would be a matter of significant
3 concern for any director of the business?
4 **A.** Yes, it would.
5 **Q.** Accounting integrity, or concerns over accounting
6 integrity, would be a significant issue, would you
7 agree, for the director, irrespective of whether the
8 business was a unitary enterprise or franchised across
9 ten or 1,000 outlets?
10 **A.** Under the combined codes, you had the same duties as
11 a director, yes.
12 **Q.** Would you, as CEO, expect any concerns or even
13 allegations about concerns that the accounting integrity
14 of a business was lacking or problematic to be escalated
15 to you and then to the main board?
16 **A.** Yes, either from the external auditors, the financial
17 community, both within POL, or the group Chief Financial
18 Officer, or the internal Audit Team. If they had any
19 concerns, I would have expected them, if it occurred
20 within POL, to report that to the POL Board but also to
21 the Holdings Board and the Audit Committee, yes.
22 **Q.** Is the CEO responsible for ensuring that the board to
23 whom they report is fully briefed on the reliability of
24 accounting systems that are used to support the figures
25 for the business?

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1 A. Generally speaking, that would be led by the CFO but
 2 supported by the Chief Executive, yes.
 3 Q. In the case of a group such as Royal Mail, would that
 4 include responsibility for the oversight of business
 5 units, such as the Post Office?
 6 A. Under our structure, that was -- as I've explained
 7 before, that was a separate reporting function in to the
 8 Holdings Board. Obviously, the financial numbers were
 9 collated by the Group Chief Financial Officer, yes.
 10 Q. What were your line management responsibilities?
 11 A. Generally speaking? So -- well they changed over
 12 a period of time, as I think I say in my statement.
 13 I was the -- initially responsible for Parcelforce and
 14 Royal Mail Logistics, which were two businesses at that
 15 time, also involved in GLS, so the parcel side, and
 16 I was responsible for trying to help modernise the
 17 Letters business. I had Marketing, Finance, and Group
 18 Technology, which, as I said before, was very focused on
 19 the huge job we had to do to modernise the Royal Mail
 20 Letters business, in terms of sorting machines,
 21 automating machines, tracking and trace capability, so
 22 that we could build a parcels business that would allow
 23 the business to compete in the future.
 24 Q. It's my fault for a poor question. Can we look at it
 25 the other way round: did any of your line management

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1 Q. In what capacity was Jonathan Evans directly line
 2 managing that person, as the Company Secretary of Post
 3 Office or of Royal Mail Group?
 4 A. I'm not sure I recall, to be honest.
 5 Q. Who had line management responsibility for the head of
 6 Product Branch & Accounting within the Post Office?
 7 A. That would have been the Post Office CFO.
 8 Q. Any oversight of that function from within Royal Mail
 9 Group?
 10 A. That would have come from the Group CFO, which was
 11 Marisa Cassoni and, in the latter years, Ian Duncan.
 12 Q. Who had line management responsibility in respect of the
 13 Head of Legal services within Royal Mail Group?
 14 A. That was Jonathan Evans, Company Secretary.
 15 Q. Who had line management responsibility for the General
 16 Counsel within Royal Mail.
 17 A. Jonathan Evans, the Company Secretary.
 18 Q. The Head of IT in the Post Office?
 19 A. Would have reported in to the Chief Executive of the
 20 Post Office.
 21 Q. Any line, whether direct or dotted, back to Royal Mail
 22 Holdings?
 23 A. Dotted for skilled advice, for want of a better phrase,
 24 to the Group Technology Director.
 25 Q. But that's in respect of advice?

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1 responsibilities include responsibility for any senior
 2 executives within the Post Office?
 3 A. Between 2000 and the end of 2005, when David Mills left,
 4 no. From 2006, when Alan Cook took over from David, as
 5 I said earlier, he had dual reporting from me on group
 6 issues, with regards to things like funding and budgets
 7 and the commercial relationship between the Post Office
 8 and Royal Mail, which, of course, was huge, but also he
 9 had a direct reporting line into the Chairman of the
 10 Post Office and the Post Office Board, as you would
 11 imagine.
 12 Q. After 2006, and other than in relation to Mr Cook, did
 13 any of the people within the Post Office Senior
 14 Executive Team report to you?
 15 A. No, I don't think so, no.
 16 Q. Can you help us with line management responsibility for
 17 the following people: the Head of Security within the
 18 Post Office?
 19 A. I believe they reported in to Jonathan Evans.
 20 Q. Did --
 21 A. The company Secretary, sorry.
 22 Q. The Company Secretary --
 23 A. Yes.
 24 Q. -- of Royal Mail Group?
 25 A. And Post Office, yes.

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1 A. Yes, they reported to the Chief Executive of the Post
 2 Office.
 3 Q. So the function stayed within Post Office?
 4 A. Yes.
 5 Q. Can I look at issues in a different way, namely which
 6 parts of the business had responsibility and oversight
 7 for certain activities, conduct or functions --
 8 A. Okay.
 9 Q. -- rather than looking at the people involved. Can we
 10 turn up page 14 of your witness statement, please, at
 11 paragraph 41.1. You say:
 12 "Oversight for criminal prosecutions and civil
 13 proceedings brought by [the Post Office] would have sat
 14 with [the Post Office] Legal Team, and oversight for
 15 prosecutions brought on behalf of the rest of the Group
 16 would have sat within the Group Legal Team."
 17 Then you say:
 18 "I believe that both legal teams would have been
 19 under the supervision of the Company Secretary, Jonathan
 20 Evans."
 21 Were you not aware that, in fact, there was no Post
 22 Office Legal team, it had no separate legal in-house
 23 function and that civil and criminal proceedings were
 24 brought by lawyers within the Royal Mail Group Legal
 25 Team.

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1 A. I was not, no.
 2 Q. So lawyers from within the Group gave advice on
 3 prosecutions, they made decisions about prosecutions and
 4 within prosecutions, and they conducted the proceedings,
 5 not any Post Office lawyers. You didn't know that?
 6 A. Was that throughout the whole period or --
 7 Q. Yes.
 8 A. And I -- I'm sorry --
 9 Q. Throughout the whole of your period.
 10 A. My period?
 11 Q. Yes.
 12 A. I was not aware of that, no.
 13 Q. Given the facts that I've just described, that would
 14 mean, is this right, that your Board had
 15 a responsibility for the conduct of a team of lawyers
 16 within Royal Mail Group who were acting on behalf of the
 17 Post Office, rather than the Post Office Board having
 18 such a responsibility for them, wouldn't it?
 19 A. In part yes, but also, they would be doing that at the
 20 behest of the Post Office team who owned Horizon and any
 21 issues deriving out of that.
 22 Q. Well, they might be their clients.
 23 A. Yes.
 24 Q. Post Office Limited might be their client?
 25 A. Yes, sorry, yes.

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1 accounts, or for the recovery of such alleged shortfalls
 2 through the use of civil proceedings."
 3 Then over the page to 87:
 4 "To the best of my knowledge, I do not recall
 5 reports of the number of prosecutions being brought by
 6 [Post Office] against subpostmasters being escalated to
 7 me, nor the fact that there were systemic issues
 8 impacting the Horizon system."
 9 I just want to test what you said in those three
 10 paragraphs there about your lack of knowledge about
 11 these activities of the Post Office. Can we start,
 12 please, by looking at RMG00000006. I think that should
 13 be, in my version there, upright. Thank you. If we can
 14 go back to page 1, please. Right.
 15 Sorry, you're going to have to tilt your head to the
 16 side. Can you see that these are minutes of an Audit
 17 and Risk Committee of the 11 November 2003.
 18 A. I can, yes.
 19 Q. Can you see that you were in attendance?
 20 A. Yes, I do.
 21 Q. I think you're the third person down in the "In
 22 Attendance". Then if we go, please, to page 5, please.
 23 Scroll down, please. Thank you. A security report.
 24 A. Yes.
 25 Q. The security report was received, so that's a document

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1 Q. I'm talking about responsibility for the conduct and
 2 work of the lawyers. That fell, if I'm right, to Royal
 3 Mail Group to manage and oversee?
 4 A. My understanding at the time was that that was also
 5 under the supervision of the Company Secretary at the
 6 Post Office, in conjunction with the Royal Mail, and
 7 they used, I thought, a mix of Post Office Legal team,
 8 augmented by Royal Mail Legal Team and outside legal
 9 people, as well. That was my understanding.
 10 Q. So be it. Can we turn up page 28 of your witness
 11 statement, please. Look to start at paragraph 83. You
 12 say:
 13 "Generally speaking, responsibility for criminal
 14 prosecutions which [the Post Office] brought would have
 15 sat under the relevant [Post Office] Executive Team
 16 members under the oversight of [the Post Office]
 17 Executive Team as a whole, the [Post Office] Risk and
 18 Compliance Committee and [the Post Office] Board."
 19 Then if we go on to 84, you say:
 20 "In response to the questions I have been asked by
 21 the Inquiry, I should add that I do not recall having
 22 involvement in or knowledge of the oversight of
 23 investigations and prosecutions brought by [the Post
 24 Office] against subpostmasters, either for theft, fraud
 25 and false accounting for alleged shortfalls in branch

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1 that's tabled for the meeting and, in particular, the
 2 following was noted:
 3 "Royal Mail personnel related crime cost the
 4 business approximately £26 million per year. In 2002/03
 5 the company had prosecuted 324 people, cautioned 108
 6 others, recommended 47 cases to the Procurator Fiscal
 7 and taken legal action in a further 43 cases. These
 8 were noted as minimum figures, since there may also be
 9 cases where local action is taken to deal with
 10 offenders."
 11 This is relatively early in your tenure, is that
 12 right, you took your post in April 2003, and this is
 13 November 2003?
 14 A. I think it was February 2003, I started, sorry.
 15 Q. So eight or so months after you took up post. So, from
 16 this point onwards, you would have known that the
 17 company was prosecuting a vast number of people each
 18 year?
 19 A. Yes, but it refers to Royal Mail personnel. We wouldn't
 20 have described subpostmasters as Royal Mail personnel,
 21 so obviously I don't recall this particular meeting,
 22 it's a very long time ago but I think by the description
 23 here I would say that was very much focused on Royal
 24 Mail personnel, both full time and casual workers.
 25 Q. You think this figure here does not include any

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1 prosecutions of Post Office employees --
 2 A. I don't think so I don't think --
 3 Q. -- or subpostmasters?
 4 A. I don't believe so no.
 5 Q. Why was that not reported to the group?
 6 A. I don't know.
 7 Q. Can you assist?
 8 A. I beg your pardon?
 9 Q. Can you assist?
 10 A. Sorry, I don't know.
 11 Q. Why would you have wanted to or why was it necessary to
 12 be told about the number of people that Royal Mail were
 13 prosecuting --
 14 A. Oh I see, I'm so sorry.
 15 Q. -- but not of the Post Office?
 16 A. Because, at this time, we were having a lot of problems
 17 in Royal Mail, both in terms of theft of things like
 18 credit cards out of the post, which was obviously
 19 severely denting confidence in the post and, indeed, of
 20 the companies that used it. There was a lot of mail --
 21 one of the reasons we were failing quality of service
 22 targets is a lot of mail wasn't being delivered, it was
 23 either being dumped or hoarded, so a whole host of
 24 reasons in terms of why what we used to call -- it was
 25 a programme run by ourselves, very much monitored by
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1 terms of theft and various other things, like hoarding
 2 or dumping, that those were very often done in
 3 conjunction with the police and other authorities. As
 4 far as --
 5 Q. So you're saying that these prosecutions that you're
 6 reading about here, you understood to be independently
 7 prosecuted, rather than prosecuted by the Royal Mail?
 8 A. A mix, I think.
 9 Q. In any event, for the proportion that were prosecuted by
 10 the Royal Mail, would you agree that that activity
 11 requires a special kind of a supervision and oversight?
 12 A. Yes, much more expert than I would claim to have.
 13 Q. Would you agree that it requires particular care where
 14 the company is the alleged victim of the crime, where
 15 the company investigates, whether it's the victim of the
 16 crime, and then decides whether to prosecute?
 17 A. Yes.
 18 Q. A phrase that's been described in the past as judge,
 19 jury and executioner?
 20 A. Right.
 21 Q. What special supervision and oversight of such
 22 an activity would you say was required?
 23 A. I would have thought the supervision of the experts,
 24 both internal and external qualified lawyers, legal
 25 advice, the General Counsel, the Company Secretary and,
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1 Postcomm and Postwatch called Mail Integrity, which was
 2 all about the integrity of the mail itself.
 3 Q. In any event, through this route, you would have known
 4 about the Royal Mail's prosecutorial activities?
 5 A. Yes, indeed, yes.
 6 Q. Would you get regular updates of the number of people
 7 prosecuted in a year, the amount of loss estimated by
 8 the criminal activities of Royal Mail Group employees or
 9 other individuals, and the amount recovered?
 10 A. I'm not sure I'd use the word "regular" but there were
 11 updates in terms of prosecution -- investigations and
 12 prosecution of staff that reached -- obviously came to
 13 the fore around the time of the Channel 4 Dispatches
 14 programme, which was in April 2004, which was obviously
 15 a very big and not good event for the company, which
 16 highlighted, through secret camera filming, all sorts of
 17 very bad practices going on in delivery offices and mail
 18 centres.
 19 Q. Would you agree -- I think you did agree before lunch --
 20 that prosecuting before the criminal courts is
 21 an unusual activity for a company to undertake?
 22 A. It is. Although I believed, and I think I'm right but,
 23 you know, I'm not a lawyer and I'm not the expert, but
 24 I think, because the ones on the Royal Mail side were --
 25 I hesitate the use the words more straightforward, in
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1 of course, any audit people looking at any of the issues
 2 that arose.
 3 Q. What about things like ensuring there's a separation of
 4 functions?
 5 A. As I said, the legal process is not my area of
 6 expertise.
 7 Q. What about things such as the independence of decision
 8 makers?
 9 A. Yes, I would have thought so, yes.
 10 Q. What about things such as intrusive supervision and
 11 regular audits and reviews of the way in which the
 12 company is conducting its prosecutorial functions?
 13 A. Yes.
 14 Q. What about special attention being paid to who you're
 15 recruiting to investigate alleged crimes against the
 16 mail?
 17 A. Yes, I would have thought so. I assumed that all of the
 18 people in the teams were proper, qualified lawyers.
 19 Q. Is the truth of the matter that you, in your position,
 20 did not have any developed understanding of the extent
 21 to which Royal Mail prosecuted or the way in which the
 22 things that I've just mentioned were or were not carried
 23 into effect?
 24 A. No, as I've said earlier, I'm not a lawyer and I'm not
 25 a -- I would not claim that that is my area of
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1 expertise, no.

2 **Q.** Can we look, please, at RMG00000008, please. This is
3 the following year. You can see that it's 24 May 2004
4 and it's a minute of the Audit and Risk Committee of
5 Royal Mail Holdings. You are shown in attendance third
6 down?

7 **A.** Yes.

8 **Q.** Can we go to page 6, please. Under the heading
9 "Protecting Royal Mail assets":
10 "[Mr] Wilson, Director of Security, attended for
11 this item, The Committee noted that Royal Mail was
12 inherently vulnerable as a business to attacks on its
13 assets, whether through fraud or other events ... The
14 committee noted:
15 "The key activity of the business in protecting
16 Royal Mail's assets and pipeline, including increased
17 focus on fraud investigations, protection of information
18 and the level of prosecutions. Separate discussions had
19 taken place and action plans had been developed to
20 address the issues highlighted recently in the
21 Dispatches programme [that you mentioned a moment ago]."

22 **A.** Yeah.

23 **Q.** "The company had made 299 prosecutions last year. John
24 Neill asked if the policy on prosecutions was clear and
25 what level of resources will be required to improve the

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1 harm, particularly on the casual side.

2 And I should stress, by the way, that makes it sound
3 like there were lots of people at Royal Mail who were
4 bad people. Actually, there were lots of wonderful
5 people in that organisation and the vast, vast majority
6 were terrific people but, clearly, we had a problem here
7 and we had to ensure that those people who were joining
8 the organisation were ones that we had done the proper
9 checks on as a way of cutting down on the level of crime
10 that was being committed on the company and, indeed,
11 therefore the citizens of the UK.

12 **Q.** My question was: why have we seen discussion in the main
13 board and in this committee of the numbers of
14 prosecutions, you say, brought by Royal Mail, and about
15 prosecutorial policy here, being referenced to the
16 committee. But, on your account, none of this relates
17 to the Post Office?

18 **A.** No.

19 **Q.** Why was that not considered by either the committee or
20 the main board of Royal Mail?

21 **A.** I don't know. Because we had gone through that very
22 difficult and bad experience in Royal Mail, I think this
23 was part of, I guess, what I mentioned earlier, about
24 therefore being very transparent about the issues we
25 were trying to deal with on the Letters side of the

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1 prosecution rate. [Mr] Wilson did not feel that
2 an increase in resource was necessary or likely to be
3 effective ... the company had identified a problem in
4 recruiting people in cities where criminal activity was
5 at higher levels."

6 This is a discussion about protecting Royal Mail
7 assets and prosecutions?

8 **A.** Yes.

9 **Q.** Again, there's a note of the number of prosecutions made
10 in the previous year. Again, in your view, does this
11 relate and only relate to Royal Mail prosecutions and
12 not include, within the figure, Post Office?

13 **A.** I think so, yes.

14 **Q.** Again, why were the Post Office prosecutions and the
15 conduct of those not being sent up to the Royal Mail
16 Board, which you've said already, but also to this Audit
17 and Risk Committee?

18 **A.** Well, the headline says, "Protecting Royal Mail Assets",
19 so, not knowing what the conversation was at a previous
20 meeting, but it could be that this is a follow-up to the
21 Dispatches thing. One of the things we did
22 post-Dispatches was managed to get agreement from the
23 Government to allow us to check the criminal records of
24 anyone that was joining Royal Mail because we had
25 an issue with bringing people in who were there to do us

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1 business, so this would have been brought forward by the
2 Letters Team to try to create that understanding of what
3 we were dealing with, clearly, for whatever reason, and
4 I don't recall why that same drive wasn't there from the
5 Post Office team.

6 **Q.** Can we look thirdly, we've -- looked at the Board, we've
7 looked at the Committee. Can I look at a third
8 potential source of oversight --

9 **A.** Of course.

10 **Q.** -- the Management Board, please? RMG00000031, please.
11 If we just blow up the top part, thank you. This is the
12 Royal Mail Management Board which sat, essentially,
13 underneath the Royal Mail Holdings Plc main board as
14 I've called it; is that right?

15 **A.** That's correct, yes.

16 **Q.** It's for Tuesday, 20 January 2004, the minute, and you
17 are present, and you're shown as a person present
18 because you are a member of this Board?

19 **A.** Correct.

20 **Q.** Could we look, please, at page 5., and scroll down to
21 "Prosecution Policy, RMM(04)94", I think that's the
22 title of the paper:

23 "The Management Board received a paper which updated
24 the Board on current levels of legal expenditure and
25 seeking endorsement for a change in priorities and

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1 considered which activities might be assessed or reduced
 2 without significant risk to the business in order to
 3 facilitate further headcount reduction. The Management
 4 Board:
 5 "Noted the balance between further headcount
 6 reductions in Legal Services and increasing external
 7 legal costs was being carefully managed;
 8 "Endorsed the prioritisation of the resource used in
 9 criminal prosecutions by the Company. The Company's
 10 public position of having a strict policy towards
 11 offenders would not be altered by this. [Mr] Evans
 12 would investigate the possibility of increasing Police
 13 and CPS involvement and report back to the Management
 14 Board on the outcome of these investigations ..."
 15 Then two action points are noted.
 16 Would you say again this is about and only about
 17 Royal Mail prosecutions?
 18 **A.** I believe so, yes, for two reasons. You will have
 19 noticed on a lot of the -- well, hopefully all of the
 20 minutes that you see, we had a policy of asking the team
 21 responsible to come to a meeting to present things, and
 22 you'll notice from the front page that you put up,
 23 there's no one from the Post Office in that --
 24 **Q.** Go back to page 1, please. If we scroll down, we'll see
 25 the others attending, which is, I think, where they
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1 the Post Office was not the subject of any scrutiny in
 2 or by the three mechanisms that we've just looked at:
 3 Board, Risk Committee or Management Board?
 4 **A.** I'm assuming that's because the Post Office -- if you
 5 remember I think there was a question, which is
 6 somewhere in my statement, around who set the agendas
 7 for the meetings. I think, as I mentioned earlier, at
 8 Royal Mail we were really pushing things forward and
 9 trying to improve things and deal with things very
 10 openly and transparently. If POL at that stage had been
 11 asked thorough the Chairman or the Chief Executive if
 12 they wanted any items raised at the Holdings Board then
 13 they would put those forward, obviously Mr Leighton was
 14 also on the POL Board itself and I guess that would have
 15 been because they didn't volunteer this issue as being
 16 one that they wanted to be discussed in that forum.
 17 At the Management Board, that was really about where
 18 the two companies came together in a sort of trading and
 19 commercial agreement, as I said earlier.
 20 **Q.** Would another way of describing it be that you let them
 21 get on with it?
 22 **A.** I wouldn't have put it that way but I understand why you
 23 might take that reference.
 24 **Q.** Do you ever remember receiving reports about the conduct
 25 of prosecutions by Royal Mail lawyers on behalf of the
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1 would appear if they were there?
 2 **A.** Yes.
 3 **Q.** Thank you.
 4 **A.** Yes.
 5 **Q.** You're making the point that there's no Post Office --
 6 **A.** There's no Post Office there and, if you look at David
 7 Mills', who was the Chief Executive of Post Office's
 8 attendance, he didn't join until quite a bit after that
 9 topic and I don't think there's any way we would have
 10 taken that topic if it involved the Post Office without
 11 him there and without any representative of the Post
 12 Office there.
 13 **Q.** Does that -- again, that can come down, thank you --
 14 **A.** To the best of my memory.
 15 **Q.** Does that, again, reflect the fact that just like the
 16 main board, just like the Audit and Risk Committee, the
 17 Management Board did not oversee or supervise in any way
 18 the conduct of prosecutions by Post Office Limited --
 19 **A.** No.
 20 **Q.** -- even though such prosecutions were being conducted by
 21 Royal Mail lawyers?
 22 **A.** Yes, on behalf of the Post Office. And, again, I should
 23 say, that's not my memory but, obviously, I completely
 24 take what you're saying as read.
 25 **Q.** Why was it the case that this prosecutorial activity of
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1 Post Office?
 2 **A.** No, I don't.
 3 **Q.** Do you think, looking back with hindsight, this is
 4 an activity that ought to have been the subject of
 5 oversight and supervision by one or more of the three
 6 boards or committees that I've just mentioned?
 7 **A.** With the benefit of hindsight, yes, I do.
 8 **Q.** To what extent is that issue that we've identified the
 9 product of the structural difficulties that you
 10 identified in paragraph 11 of your witness statement?
 11 **A.** As I said, my -- again, looking back with hindsight,
 12 I think that was one of my concerns, that, in this
 13 structure, it allowed things to potentially appear in
 14 the cracks for want of a better phrase, because I can't
 15 think of a better one right now.
 16 **Q.** What information ought the Royal Mail Board, its
 17 Management Board or its Risk Committee to have received
 18 from Post Office Limited about the conduct of
 19 prosecutions?
 20 **A.** Probably similar to what we've seen on Letters, which is
 21 an explanation of what was going on and to what degree.
 22 **Q.** We've seen that, in one of the minutes, that the Board
 23 was exercising some control, was either turning the dial
 24 up or turning it down on the extent to which an active
 25 prosecution policy should be pursued. Would that be
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1 a function of Royal Mail Group Board over the Post
 2 Office that it ought to have performed?
 3 **A.** Again, I think the level of awareness of this, because
 4 of the lack of communication from the Post Office, was
 5 probably very low.
 6 **Q.** Where does the responsibility for the lack of
 7 communication from the Post Office fall?
 8 **A.** I think you would have to say for the Post Office Chief
 9 Executive and the Chairman.
 10 **Q.** That's --
 11 **A.** That assumes, by the way -- sorry, beg your pardon --
 12 **Q.** I think we're about to say the same thing. That assumes
 13 that they knew?
 14 **A.** Exactly that and, you know, obviously, I don't know
 15 whether they did or not. My assumption is that they
 16 didn't but I guess that's one of the roles of the
 17 Inquiry, is to figure that out.
 18 **Q.** As well as responsibility potentially resting with Post
 19 Office's Chief Executive and Chairman, does
 20 responsibility not rest with Royal Mail for designing
 21 a structure in which none of its systems of oversight
 22 picked up that this prosecutorial activity was even
 23 going on, on your account?
 24 **A.** I think it is a matter of real regret that all of those
 25 checks and balances, the governance systems in both

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1 prosecutions are concerned?
 2 **A.** I think that -- because he reported to the Company
 3 Secretary, I think his role would have been reviewed by
 4 the Company Secretary, in terms of performance.
 5 **Q.** So the answer I think is, for you personally, none, but
 6 that's because it was Mr Evans' responsibility?
 7 **A.** That's correct.
 8 **Q.** You tell us in your witness statement -- no need to turn
 9 it up, it's paragraph 43 -- that you trusted the
 10 Managing Director/CEO of the Post Office, and the Chair,
 11 to raise any significant systemic or reputational issues
 12 relevant to the Post Office that would have had
 13 an impact on the Group, either at the Royal Mail
 14 Management Board meetings or the main board meetings; is
 15 that right?
 16 **A.** Yes.
 17 **Q.** When you say you trusted, do you mean you assumed that
 18 they would?
 19 **A.** Not just that. I mean, obviously, I assumed there's
 20 good people in the senior position very qualified for
 21 the roles, that they would volunteer those issues but,
 22 as you can tell in many places in my statement, I made
 23 it very clear that our style of management from the
 24 Board down was to go looking for problems. We were
 25 fixing things across the business. I clearly wish we

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1 companies, failed, as well as internal audit, external
 2 audit, all the checks and balances that were put in
 3 failed to surface this issue out of the Post Office to
 4 a wider set of people.
 5 **Q.** What was the level of your contact with Royal Mail's
 6 General Counsel?
 7 **A.** Mostly through the Company Secretary but, from time to
 8 time, separately.
 9 **Q.** Did you ever explore with the General Counsel the extent
 10 to which he or she had involvement in the prosecutorial
 11 activities of the Post Office?
 12 **A.** I did not, no.
 13 **Q.** Did you ever explore with such General Counsel how they
 14 ensured adequate resources were available to ensure
 15 effective oversight of the Post Office's own legal and
 16 regulatory obligations?
 17 **A.** It was quite a regular question, at most audit
 18 committees, to the various teams through Jonathan in
 19 Legal and internal Audit, you know, "Have you got enough
 20 people to do the job that you need to do?" That would
 21 be a question that would be regularly asked.
 22 **Q.** What steps, if any, did the Royal Mail Board or you take
 23 to ensure that the role of General Counsel was
 24 effectively discharged, so as to ensure compliance path
 25 Post Office with its legal obligations, so far as

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1 had known about this, because I think when I look at
 2 collectively what we were tackling, I'm sure we would
 3 have done it if we were aware of it and, unfortunately,
 4 which is a huge regret, we weren't.
 5 **Q.** So you and your Board and your Management Board, you
 6 tell us actively sought out problematic areas?
 7 **A.** Yes.
 8 **Q.** Not only was this one not found, those within Post
 9 Office did not escalate it to you or your Board?
 10 **A.** They did not.
 11 **Q.** How would you define an issue that had "significant
 12 systemic or reputational issues relevant to the Post
 13 Office", ie what was the threshold that needed to be
 14 crossed in order for an issue to be escalated to you?
 15 **A.** I think something that would genuinely impact the
 16 performance of the company that would also have
 17 an impact on the group itself, whether that was
 18 financially or reputationally.
 19 **Q.** How was that made clear or communicated to the Post
 20 Office Executive Team so that they would know -- for
 21 example, the issues with which we are dealing -- whether
 22 they fell on the "escalate" or "do not escalate" side of
 23 the line?
 24 **A.** Yeah, I don't think there would have been many Board
 25 meetings without the Chairman and the Non-Exec Directors

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1 and the Executive in the space of myself saying that we
 2 needed to try to get to the bottom of all the issues.
 3 It all started with inheriting a company in severe
 4 trouble and we asked people, at all times, to be open,
 5 transparent and for bad news to travel very fast. We
 6 went looking for that. If I take an example, which is
 7 in my statement, in the Letters business, you know,
 8 myself and the Chairman would meet with thousands of
 9 frontline delivery office managers on a regular basis.
 10 We would get them to tell us everything that they
 11 felt was wrong with the business, issues they needed
 12 fixing. We'd go away, we'd come back the next time,
 13 we'd tell them what we'd done in terms of fixing it and
 14 we'd ask them what we needed to tackle next.
 15 So all of those issues were just about trying to
 16 make progress in a company that was starting from
 17 a very, very terrible position.
 18 **Q.** Were you relying on the judgement and discretion of the
 19 CEO and the Chair within the Post Office to raise
 20 matters which they thought ought to be before the Board?
 21 **A.** Yes.
 22 **Q.** Do you know what steps they took to motivate or
 23 encourage their staff towards openness and
 24 accountability and transparency in your period of
 25 office?

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1 was increasingly inhabiting. So I think there was
 2 a sort of difference in outlook, there was a difference
 3 in the objective of the two companies and, as I said
 4 earlier, I think all the separation things which, in
 5 many ways, made sense, in terms of those different
 6 futures, I think also probably exacerbated some of those
 7 feelings of we're different.
 8 **Q.** We've heard evidence in the Inquiry from more than one
 9 person that they took decisions not to escalate concerns
 10 about Horizon or the way that cases were prosecuted
 11 because the Post Office was a highly politicised
 12 organisation, it was very hierarchical, they would have
 13 been seen, for example, as stepping out of line if they
 14 had delivered such a message, that it wouldn't have been
 15 good for their career, and they chose unconsciously to
 16 protect themselves. Was that a culture of which you
 17 were aware, within the Post Office at the time?
 18 **A.** I'm very sorry to hear that. I mean, I certainly
 19 encouraged the complete opposite. I wanted people to be
 20 open. We encouraged people to be open. It's actually
 21 partly why we created Have Your Say, it's why it was
 22 anonymous, and I regret if that was the case within Post
 23 Office but there were other ways anonymously to get
 24 information to people if people were concerned.

There was also whistleblowing too, but I think Have

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1 **A.** I think Sir Mike Hodgkinson, I think, set up the Risk
 2 Committee there and Chaired it himself. I think he
 3 tried to install the right attitudes. Obviously,
 4 I wasn't in any of those meetings, I wasn't in the POL
 5 Board meeting other than on the two occasions I think
 6 that we spoke about earlier, so I was never seeing that
 7 firsthand.
 8 **Q.** You've mentioned that there was a fundamental difference
 9 in culture between Royal Mail and Post Office and that
 10 related, in particular, to openness; is that right?
 11 **A.** I'm not sure if I -- you might correct me and say I used
 12 the word "fundamental" but, certainly, I thought there
 13 was a real difference in --
 14 **Q.** A real difference, okay.
 15 **A.** Yes.
 16 **Q.** In what did that have its origins?
 17 **A.** I don't -- obviously, this is looking back with
 18 hindsight.
 19 **Q.** Well, my next question was going to be: was it obvious
 20 at the time?
 21 **A.** Not obvious in that sense but I think the Post Office,
 22 I think, internally within the Post Office, always
 23 thought of themselves as a different organisation, the
 24 public service, the face of Government, and felt that
 25 that was very different from the space that Royal Mail

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1 Your Say was another way of doing that, so there was
 2 more than one route to be able to do that.
 3 **Q.** You say that you trusted Mr Cook, when he was Managing
 4 Director, to raise systemic or reputational issues that
 5 had been devolved to POL, such as concerning legal or IT
 6 functions, to you and to the main board; is that right?
 7 **A.** I did, yes.
 8 **Q.** Have you had any reaction or how do you feel about
 9 Mr Cook's claim that, in his period of office, he did
 10 not even know that the Post Office had a prosecutorial
 11 function until 2009, ie until the Computer Weekly
 12 article, despite having been Managing Director of the
 13 Post Office since 2006 and a Non-Executive Director for
 14 years before then?
 15 **A.** I would find that surprising.
 16 **Q.** He has told the Inquiry that, although he had
 17 conversations with the Head of Security about fraud,
 18 about liaison with the police, he remained in the dark
 19 about the prosecutorial function. At the time, did he
 20 strike you as a man who was so out of touch with the
 21 business that he was running, that he wouldn't know that
 22 one of its functions was to prosecute its own staff,
 23 resulting in many of them being sent to prison?
 24 **A.** He certainly always gave the impression of someone who
 25 was very much in control of his brief. His particular

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1 area of expertise was in Financial Services, which was
 2 including his previous role. And, obviously, that
 3 was -- given the amount of Government revenue that had
 4 been lost, both the through the loss of benefits
 5 payments and the forthcoming loss of the POL card,
 6 Financial Services was one of the few ways that the Post
 7 Office could fill that revenue gap. So he was brought
 8 in specifically with that skill. I do know that he
 9 spent -- I remember him always saying how much time he
 10 spent with subpostmasters, with the NFSP, and he never
 11 gave the impression to either myself or indeed the
 12 board, in fairness, of being anything other than in
 13 control of that brief.

14 **Q.** You tell us in your witness statement that, as you have
 15 done today, that Mr Jonathan Evans, the Company
 16 Secretary, sat on both boards, the main board and Post
 17 Office Limited Board, correct?

18 **A.** He did, yes.

19 **Q.** Was his role, by sitting on both of those boards,
 20 expected to be one which exercised any particular
 21 function across both businesses, ie by reason of sitting
 22 on both boards?

23 **A.** Well, as you know, the Company Secretary has a slightly
 24 different role in the sense of not being part of
 25 a management team, if you like, effectively they report

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1 therefore, relatively established when you arrived in
 2 2003?

3 **A.** When I say I recall, I now recall because I've read all
 4 this stuff. When I arrived, it was just the system that
 5 the Post Office used.

6 **Q.** Were you, therefore, not aware of the history of the
 7 procurement for the contracting about and development
 8 of, Horizon when you arrived?

9 **A.** Not in the slightest, no. It would be quite unusual for
 10 someone to arrive and people to take them back
 11 eight years, five years, whatever. So no, not --

12 **Q.** I want to ask you about the extent to which any of that
 13 back history was revealed to you. Were you aware of the
 14 collapse of the wider contract between the Post Office,
 15 Fujitsu -- then called ICL -- and the Benefits Agency?

16 **A.** No.

17 **Q.** That was a matter of quite some controversy in the late
 18 '90s, before you joined Royal Mail. That was something
 19 of which you were unaware?

20 **A.** No.

21 **Q.** Were you aware of or told about on arrival the issue of
 22 the withdrawal of the Benefits Payment Card, and
 23 therefore the Benefits Agency, from a joint programme
 24 with the Post Office, which was seen as an existential
 25 crisis for the Post Office?

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1 to the board and to the Chairman in a more independent
 2 way. Jonathan also had a huge history with the company,
 3 and so he played that sort of role of understanding the
 4 history, both sides of the business, and was trusted by
 5 everyone on the board, whether that was the Holdings
 6 Board or indeed the Post Office Board.

7 **Q.** My question is more was it by design, ie with a purpose,
 8 or an outcome in mind, that he sat on both boards?

9 **A.** I think it was to ensure there was more glue there
 10 across the two. Again, that's something that had been
 11 decided quite a while before I arrived, but was there
 12 and in place when I arrived, and seemed to work very
 13 well.

14 **Q.** He was the line manager, essentially, of the Legal
 15 Services team within the Royal Mail Holdings?

16 **A.** Yes, he was.

17 **Q.** Can you say whether or not that played any part in the
 18 decision that he should be Company Secretary of both
 19 organisations and should sit on both boards?

20 **A.** I genuinely don't know, partly because the decision had
 21 been made quite some time before I arrived, I'm sorry.

22 **Q.** Can we turn, please, to your knowledge of Horizon. You
 23 tell us in your witness statement that you recall that
 24 the system was first piloted in 1995, and rolled out in
 25 2000 with further development thereafter and was,

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1 **A.** No. You don't mean that when they decided to no longer
 2 pay benefits --

3 **Q.** Yes.

4 **A.** -- through the Post Office, do you?

5 **Q.** Yes.

6 **A.** I was aware of that because, obviously, that was
 7 a dramatic loss of revenue for the Post Office, which
 8 actually caused a lot of the initial subsidies to be
 9 required from the Government.

10 **Q.** Was that linked in your briefings or your readings in,
 11 in any way, with originally the Benefits Agency being
 12 part of a joint programme --

13 **A.** No, that was.

14 **Q.** -- to procure the system?

15 **A.** That was entirely linked to the fact that this was
 16 coming from the DWP, Department for Work and Pensions,
 17 which was -- their role, not surprisingly, was to get
 18 value for money in terms of the public purse, and,
 19 effectively, the cost, as it was described to me, the
 20 cost of providing a benefits payment to a particular
 21 individual through the Post Office, I don't remember the
 22 exact figures, but roughly speaking might be £1 and, if
 23 it was done directly into the bank account, it might be
 24 a matter of 5p or 6p.

25 So, from a spending taxpayers money wisely point of

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1 view, that was a change that they felt they had to make.
 2 So, in that sense, the Government was both causing
 3 the -- inadvertently causing the difficulty of taking
 4 a lot of money away from the Post Office, and the
 5 subpostmasters, but then was also trying to solve the
 6 problem in another part of the field by providing
 7 a subsidiary to help allow the company to continue to
 8 trade.

9 **Q.** You weren't told or didn't read about, on joining the
 10 company, that part of the equation for the DWP opting
 11 for direct payments was that they had lost trust in
 12 Fujitsu, ICL Pathway, and the quality and reliability of
 13 the computer system that they were selling?

14 **A.** As it was told to me, it was all about the costs benefit
 15 analysis for them and the use of public money.

16 **Q.** Were you told about a political decision having been
 17 made, that the Post Office had to take the Horizon
 18 system from Fujitsu, against many of its employees
 19 wishes --

20 **A.** No.

21 **Q.** -- because they too thought that it lacked, and its
 22 supplier lacked, credibility and reliability?

23 **A.** No, I -- when was that? Was that --

24 **Q.** That carried on for many, many years.

25 **A.** Okay, well, I'm not aware, no.

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1 a tendency just to get on with things, and not look
 2 back.

3 **Q.** So Horizon was relatively well established by 2003 --

4 **A.** Yes.

5 **Q.** -- and was working?

6 **A.** As far as I was aware, yes.

7 **Q.** Did nobody brief you about the rather problematic birth
 8 that it had had?

9 **A.** No.

10 **Q.** At any of the future meetings that you attended, did any
 11 of those who had been in post at the time of the rather
 12 difficult development of Horizon -- for example David
 13 Miller or Jonathan Evans -- ever tell you about those
 14 issues?

15 **A.** Jonathan did not and part of my briefing when I arrived
 16 at the company was meeting Dave Miller, and I do not
 17 believe he mentioned it at all.

18 **Q.** Would you agree that the Horizon system was one on which
 19 the effective and efficient running of the business was
 20 greatly dependent?

21 **A.** Yes, I would.

22 **Q.** It was a business critical system?

23 **A.** Yes.

24 **Q.** But what steps did the main board take in your
 25 seven-year period to ensure that it was running reliably

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1 **Q.** Okay.

2 **A.** Long before my time, I assume.

3 **Q.** When the system was being developed, tested and then
 4 rolled out, there were a series of so-called Acceptance
 5 Incidents -- ie problems or issues with the system or
 6 with processes -- that contractual provisions regulated
 7 as to whether they needed to be solved before a national
 8 rollout. Were you briefed about that process: the
 9 Acceptance Incidents issue?

10 **A.** No.

11 **Q.** Were you aware of the autumn 2000 National Audit Office
 12 report, which criticised Post Office Management and
 13 indeed the Government in the management of the
 14 arrangements in the contractual history for the
 15 procurement of Horizon?

16 **A.** No.

17 **Q.** When you took up your role in 2003, did you have any
 18 appreciation at all, or were you briefed about, any
 19 issues with the contracting for, development of and
 20 rolling out of horizon?

21 **A.** No, as I arrived, the system had effectively been rolled
 22 out and people were, as far as I was aware, just dealing
 23 with that as the system the company had used. And
 24 organisations in my experience do have a habit of, once
 25 they're up and running with something, there's

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1 and with integrity?

2 **A.** I don't recall exactly but I would have -- I would
 3 naturally assume that it will have been part of the
 4 internal audit plan.

5 **Q.** Can you recall whether any such steps were taken by the
 6 Management Board or the Risk Committee?

7 **A.** Well, the -- the internal audit plan would all be
 8 approved and come to the Management Board and the Audit
 9 Committee and the Board for debate.

10 **Q.** Are you aware of an internal audit conducting any
 11 review, or investigation in your seven years, of the
 12 reliability and accuracy of the data that Horizon
 13 produced?

14 **A.** I genuinely can't remember, sorry.

15 **Q.** Would Internal Audit, if they did conduct such
 16 an investigation or a review, be the appropriate people
 17 to do so?

18 **A.** Yes.

19 **Q.** What skills did Internal Audit, so far as the operation
 20 of a computer system, have?

21 **A.** Well, it's a financial accounting system, they have
 22 those skills and abilities. That's what good Audit
 23 Teams do. They know how to get under the skin of
 24 projects like that and to understand how the mechanics
 25 of the system worked, if they were concerned about

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1 anything like that, they would have the ability to call
2 in further expertise in any particular area and then to
3 bring forward a report.

4 And, as I said earlier, we encouraged -- you will
5 have noticed on some of the papers, certainly, I know
6 the ones that were sent to me, that our internal audit
7 reports were pretty brutal, and we asked them to be that
8 way because we wanted to understand, you know, the worst
9 of what we were dealing with.

10 As to when and if they did one on Horizon, as I said
11 earlier, I genuinely can't remember. I would have
12 thought so, on the grounds of over those years, and
13 an important issue, but I don't remember the individual
14 report, I'm very sorry.

15 **MR BEER:** Sir, I've sailed past 3.00.

16 **SIR WYN WILLIAMS:** How is the transcriber faring?

17 **MR BEER:** I think she said she wanted a 10-minute break.

18 **SIR WYN WILLIAMS:** Yeah, okay. So we'll begin again at
19 3.15 -- yes, 3.15.

20 **MR BEER:** Thank you, sir.

21 (3.06 pm)

22 (A short break)

23 (3.15 pm)

24 **MR BEER:** Good afternoon, sir. Can you see and hear us?

25 **SIR WYN WILLIAMS:** Yes, thank you.

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1 numbers, in the work that they were doing for half year
2 and full year audits. Just in case I misunderstood you
3 in thinking that was an outside specific look at
4 Horizon. That is all. If it's a needless
5 clarification, I'm sorry.

6 **Q.** It's certainly not needless at all because we have seen
7 the audits and the extent to which they do undertake
8 that function, and that's a very open question.

9 **A.** Okay.

10 **Q.** Why did you believe that external auditors, as part of
11 their external accounting audit function, would assess
12 the reliability of the Horizon system?

13 **A.** Well, they would be looking at the numbers and the
14 quality of the numbers and the consistency of the
15 numbers that they were looking at, so I assume they
16 would be cross-checking all of that all of the time.

17 **Q.** So does it amount to this: you would expect that, if
18 they are to sign off the accounts, in circumstances
19 where the data within them is produced by a computer
20 system, that they would make some enquiries and conduct
21 some investigation on an annual basis into the
22 reliability of the data itself?

23 **A.** I would have thought so. Again, I'm a layman on this,
24 but I would have thought so.

25 **Q.** Was anything ever said or shown to you, so far as you

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1 **MR BEER:** Thank you.

2 Mr Crozier, you address in your witness statement,
3 no need to turn it up, paragraph 63 to 65, issues of
4 knowledge of bugs, errors and defects in Horizon. Is
5 the short summary this: that at no time did anyone
6 within the Post Office Executive Team, or its Board,
7 draw your attention or, so far as you're aware, your
8 board's attention, to any bugs, errors or defects in
9 Horizon.

10 **A.** As far as I recall, they did not. Could I just mention
11 one more point? If I may.

12 **Q.** Yes, of course.

13 **A.** Just, in case I misunderstood an earlier question, you
14 asked me about external audit of the Horizon system,
15 obviously the external auditors were constantly testing,
16 when they were reviewing the accounts and the numbers at
17 the half year and the full year, that the system was
18 working as it should work.

19 **Q.** Just stopping you there, if I may, without wishing to
20 probe on a clarification point raised, you said
21 obviously the external auditors were examining the
22 operation of Horizon. Why was that obvious to you?

23 **A.** Oh, sorry. Just a word, sorry. No particular meaning.
24 I just meant, in the sense of, obviously, they would be
25 checking the quality of earnings, the quality of the

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1 can now recall, that suggested that that is what they,
2 in fact, did?

3 **A.** Nothing that was shown to me suggests that they had
4 a concern about the quality of the numbers.

5 **Q.** Was anything shown to you to suggest, so far as you can
6 now recall, that their audit, in fact, involved any
7 examination of the integrity of the Horizon system?

8 **A.** I don't recall, sorry.

9 **Q.** Can we turn back then to the bugs, errors and defects
10 issue?

11 **A.** Yes.

12 **Q.** I think it remains the case that you say that, in your
13 seven-year tenure, at no time did the Post Office draw
14 your attention to any bugs, errors and defects in the
15 Horizon system?

16 **A.** No, and the Operations Team, whether that was David
17 Miller, Ric Francis or Paula Vennells, they attended
18 lots of different meetings. I do not recall them doing
19 that, no.

20 **Q.** You, I think, probably know now, in general terms, that,
21 as a result of the findings of a series of court cases,
22 it has been established that, within the period 2000 to
23 2010 -- so including your period of office from 2003 to
24 2010 -- there were a series of bugs, errors and defects
25 in the Horizon system, of which the Post Office knew and

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1 which either caused or were capable of causing financial
 2 irregularities and balancing problems?
 3 **A.** I am now aware of that, yes.
 4 **Q.** Would you expect the people within the Post Office who
 5 you have just listed, if they had been aware of them, to
 6 draw them to you and your Board's attention?
 7 **A.** I would have expected them in the first instance to draw
 8 them to the attention of the Post Office Exec Team and
 9 Board and absolutely, yes, to, if they were serious and
 10 systematic, to the Management Team and the Holdings
 11 Board, yes.
 12 **Q.** So you would have expected it not to have been a direct
 13 communication to you but to have gone through the Post
 14 Office Board route; is that right?
 15 **A.** Well, to simplify it, I would have expected them to tell
 16 the Post Office Chief Executive, and I would have
 17 expected the Post Office Chief Executive to tell the
 18 Board and myself very quickly and simultaneously.
 19 **Q.** Did you know about a Post Office stock line on Horizon,
 20 namely one in which it was said that the "system is
 21 robust"?
 22 **A.** Only from what the Inquiry has sent me in terms of some
 23 of the responses sent by Alan Cook to various parties.
 24 **Q.** I think you're referring to some internal Post Office
 25 emails, which refer to what I've just said as being our

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1 any just secured state subsidy to bring it barely into
 2 profitability; is that right?
 3 **A.** I think it finally came through after I left, some time
 4 later in 2010, I believe.
 5 **Q.** Had the securing of that state subsidy been a major
 6 issue for most of your period of time in office?
 7 **A.** I think there were three occasions, I think, when that
 8 became an enormous debate. Probably one of the biggest
 9 was around 2006 because, at that point, they'd announced
 10 that the Post Office Card Account was also going, so
 11 there was -- in terms of looking forward and going
 12 concern basis, there was yet more revenue going to be
 13 disappearing from the Post Office and that required --
 14 I think, part of the agreement then was a particular
 15 subsidy, I can't remember the exact number, but it also
 16 meant a reduction in the number of post offices by
 17 around 2,500, I think.

18 So, from a Post Office point of view, you know, for
 19 almost every subpostmaster, an issue was the declining
 20 income and the closures of the Post Office, and I think
 21 for MPs, for Select Committees, for Government, that
 22 almost took over the whole agenda for the Post Office,
 23 and at roughly the same time there was a thing called
 24 the Hooper review, which was an independent Government
 25 review, which they adopted, which came up with four

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1 stock line?
 2 **A.** Yeah, okay.
 3 **Q.** Firstly --
 4 **A.** I was not aware of that, no, sorry.
 5 **Q.** Okay. Were you aware of, had you heard the phrase when
 6 you were in office, that the Post Office believes that
 7 its system is "robust and has integrity"?
 8 **A.** I certainly never heard -- I didn't hear that statement
 9 but I never heard anyone say that it wasn't.
 10 **Q.** So you hadn't, as you recall, heard the stock line nor
 11 did you know it was called a stock line?
 12 **A.** No, sorry.
 13 **Q.** Is that because, from your perspective, the integrity or
 14 lack of it in Horizon wasn't in issue?
 15 **A.** It wasn't an issue that was being flagged up by anyone
 16 in that sort of chain of checks and balances that
 17 I outlined earlier, no.
 18 **Q.** If Horizon's integrity was in question, but a stock line
 19 was being used in which it was said that it was robust,
 20 that would be a serious matter for not only the Post
 21 Office but for Royal Mail Group, wouldn't it?
 22 **A.** It would indeed, and it would also be entirely wrong.
 23 **Q.** I'm sorry?
 24 **A.** It would indeed.
 25 **Q.** In late 2009 and early 2010, I think the business had

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1 things: (1) that the Royal Mail should be allowed
 2 private capital; (2) that the Post Office should stay in
 3 public ownership; (3) there should be a change in
 4 regulator; and (4), Government should look to try and
 5 take care of the Post Office pension.
 6 The code for outside capital was actually that was
 7 a request from the shareholder to try to look to see if
 8 Royal Mail could be sold, in part or in whole, to
 9 another European player or private equity.
 10 **Q.** Would you agree that the significance of the dire
 11 financial situation of the business, the Post Office
 12 business, would have been apparent to everyone in the
 13 Post Office Executive Teams throughout your time in
 14 post?
 15 **A.** Most certainly.
 16 **Q.** Would you agree that, if any, question marks over the
 17 integrity of Horizon and the data it produced would be
 18 a very significant matter not only for the Post Office
 19 but also for the shareholder?
 20 **A.** It would.
 21 **Q.** In part, because that shareholder was also responsible
 22 for the investment by way of the subsidy?
 23 **A.** Indeed.
 24 **Q.** You say that Royal Mail met with the shareholder -- the
 25 Shareholder Executive, ShEx -- on a roughly quarterly

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1 basis?

2 **A.** Yes.

3 **Q.** When you were providing feedback and updates to the

4 Government through the Shareholder Executive, were you

5 entirely reliant, if the matter concerned the Post

6 Office, on the information that the Post Office Board

7 and Chief Executive relayed to you?

8 **A.** The conversations that we had with the Shareholder

9 Executive, as the Royal Mail Management Team, were

10 mostly around, I think -- if I can find the right space

11 in my statement -- were around the financial performance

12 of the company, how far we were getting with our

13 modernisation programme, relationships with the unions,

14 and of course questions of ownership. I've mentioned

15 one around the potential sale of or in part of Royal

16 Mail, there was another large debate where myself and

17 Allan Leighton and the Board, we wanted to try to turn

18 Royal Mail into, in shorthand, a John Lewis partnership.

19 We wanted 20 per cent of the company to be owned by our

20 people, and I include in that subpostmasters.

21 We valued the subpostmasters, Allan, as

22 an ex-retailer, understood the importance of frontline

23 managers, and we want to the subpostmasters, actually,

24 to have an ownership of the Post Office. So we

25 discussed things like that but, obviously, we discussed

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1 very carefully done from a Royal Mail point of view,

2 those had to be commercial loans at competitive rates,

3 and --

4 **Q.** Cutting through it, Mr Crozier, were they entitled to

5 attend?

6 **A.** They were absolutely entitled to attend.

7 **Q.** Every meeting?

8 **A.** Yes, sorry, but rarely did, save for those really big

9 topics, of funding, solvency and ownership.

10 **Q.** That was their choice; is that right?

11 **A.** That was their choice, yes.

12 **Q.** What about attendance by the Shareholder Executive at

13 Post Office Board meetings?

14 **A.** During my time, they did not do that nor did they have

15 a representative on the board during my time, no.

16 **Q.** What was the reason for that?

17 **A.** I don't know. You'd have to ask them.

18 **Q.** Finally then, please, you tell us in your witness

19 statement that your objective in your period of office

20 was to deliver a better group for all stakeholders, and

21 would you agree that, so far as this Inquiry is

22 concerned, that objective would include treating

23 subpostmasters as trusted trading partners --

24 **A.** I would indeed.

25 **Q.** -- not assuming that they were on the take or some of

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1 funding.

2 At the same time, the Post Office had very regular

3 meetings with Shareholder Executive but a separate team

4 within that, and that was the constant day-to-day on

5 Post Office business, closure programmes, revenue, all

6 of those things, so there was sort of parallel, if you

7 like, conversations going on.

8 **Q.** Was anyone from Royal Mail Group present at any of those

9 meetings or communications between the Shareholder

10 Executive and the Post Office?

11 **A.** No doubt some, but probably not all, and some would have

12 been Jonathan Evans, I think.

13 **Q.** So there were, as you've described it, essentially two

14 parallel routes back to Government?

15 **A.** Correct, yes.

16 **Q.** You tell us in your statement that the Shareholder

17 Executive rarely attended Royal Mail Board Holdings; is

18 that right?

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

20 **Q.** Why was that?

21 **A.** Well, the times I can remember them attending were, to

22 be honest, the things I've mentioned, which were around

23 potential ownership changes, were around the solvency

24 debate and the subsidies. That always had to be --

25 I mean, another degree of separation was that had to be

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1 them were on the take?

2 **A.** No, I think some of the language I've heard over the

3 last few weeks is deplorable.

4 **Q.** Were you aware of the removal of the facility for

5 subpostmasters to query losses that were attributable to

6 them by the computer system?

7 **A.** No, I have wracked my brain on that and I genuinely

8 don't remember that coming to the Board, no.

9 **Q.** Would you agree that the removal of that function was

10 inconsistent with treating them as trusted trading

11 partners?

12 **A.** I don't know the detail of it. From the sounds of it,

13 I would have agreed with you.

14 **Q.** It was a form of requiring them to pay for all losses

15 attributed to their branch by a computer without the

16 facility for them to query or even to investigate how

17 that loss had occurred.

18 You, I suspect, have read some of the judgments of

19 the courts of the past few years --

20 **A.** Yes, I have.

21 **Q.** -- concerning the Horizon system?

22 **A.** They've made it very clear in terms of the failures, in

23 terms of disclosure.

24 **Q.** In particular, the Horizon Issues judgment of 2019 sets

25 out a series -- and it's into double figures -- of

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1 defects in Horizon, which were prevalent and were known
 2 about by the Post Office during your seven-year tenure.
 3 Looking back, who is responsible for the fact that
 4 none of that, on your account, was escalated to you or
 5 your Board?
 6 **A.** I'm not sure it's fair or right for me to speculate on
 7 something as important as this. All I can say, from
 8 what I remember at the time, was that it did not get up
 9 to the areas that I've mentioned earlier. Looking back
 10 with hindsight now, clearly, at a certain level of -- in
 11 the Post Office, it went no further.
 12 **Q.** This happened, in a sense, on your watch?
 13 **A.** Yes, it did.
 14 **Q.** You must have had a period of self-reflection and
 15 thought: what went wrong? What conclusions, if any, did
 16 you arrive at?
 17 **A.** I mentioned in my statement, you know, I can genuinely
 18 say it's one of the toughest jobs I've ever done, from
 19 a terrible starting point and the degree of difficulty
 20 in making change in the Royal Mail.
 21 I do look back and wonder, as we talked about
 22 extensively earlier, whether the structure exacerbated
 23 the problems, for want of a better word. I can see that
 24 there was a lack of transparency now in the Post Office.
 25 I had assumed they were making the same strides that we

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1 **Q.** Prosecutions were referred to in those minutes, numbers
 2 of prosecutions, cost to the business, and so on. Your
 3 view was that the discussions to which those entries
 4 referred must have related solely to Royal Mail
 5 prosecutions.
 6 **A.** I think so, yes.
 7 **Q.** One of the reasons for that was that nobody from Post
 8 Office was present at the meeting when they were
 9 discussed?
 10 **A.** It was also because they were referred to as Royal Mail
 11 personnel, if I remember, and that's not how
 12 subpostmasters would be referred to in the Royal Mail.
 13 **Q.** I see. At the time of the meeting about which those
 14 minutes were prepared, was it Post Office Legal
 15 Department that conducted Post Office prosecutions or
 16 Royal Mail?
 17 **A.** I thought it was Post Office.
 18 **Q.** If I suggested to you that Post Office only took over
 19 prosecutions after separation of Royal Mail Holdings and
 20 Post Office Limited in 2012, would you be able to
 21 disagree?
 22 **A.** I don't recall. I'm not sure I'd be able to disagree,
 23 no.
 24 **Q.** Right. So you don't know who was responsible, you're
 25 not sure who was responsible for Post Office

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1 were in the rest of the company and, you know, at the
 2 time, what I don't understand now is why people -- it
 3 seems like a perfectly normal thing for me to do is, if
 4 you were worried about the performance or if you thought
 5 there were issues, why you wouldn't get someone from the
 6 outside in to look at that and give you a genuine, open,
 7 independent view of what the problem was.
 8 And I can see that those were mistakes and whilst
 9 I used to like to look back on my time as it being very
 10 hard but we made a lot of progress, clearly, it's
 11 impossible to do that now without feeling that it's in
 12 large part tainted by this, for obvious reasons.
 13 **MR BEER:** Thank you, Mr Crozier. Those are the questions
 14 I ask.
 15 Sir, there are two lots of Core Participant
 16 questions of no more than five minutes each.
 17 I think we'll start with Mr Moloney if that's
 18 possible.
 19 **Questioned by MR MOLONEY**
 20 **MR MOLONEY:** Thank you, sir. Mr Crozier, just two matters,
 21 please.
 22 Early in the questioning of you by Mr Beer this
 23 afternoon, you were taken to Audit Risk and Compliance
 24 Committee minutes, do you remember?
 25 **A.** Yes.

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1 prosecutions at the time at which those minutes were
 2 prepared?
 3 **A.** Well, I assume the client would have been -- well, those
 4 minutes, I think, referred to Royal Mail. So just to
 5 make sure I understand the question, if you're asking me
 6 who was responsible for the Post Office, obviously the
 7 Post Office was the client.
 8 **Q.** Right.
 9 **A.** Where they were sourcing that legal help from, I had
 10 always assumed it was partly internal, partly through
 11 a bit of Royal Mail resource and, obviously, external
 12 resource too, as far as I can recall.
 13 **Q.** Thank you.
 14 You've just agreed with Mr Beer that Post Office was
 15 facing real financial difficulty on your watch.
 16 **A.** Yes.
 17 **Q.** Yes. Insolvency was in issue?
 18 **A.** From before I joined and during the time I was there,
 19 yes.
 20 **Q.** You agreed that those were factors that everyone in the
 21 business would have been well aware of?
 22 **A.** Yes, I believe so, yes.
 23 **Q.** Anyone who read the annual reports or the press, indeed?
 24 **A.** Yes.
 25 **Q.** You agreed that Horizon was a business critical system?

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1 A. Yes.

2 Q. If Horizon were to fail because it lacked integrity and

3 you had to start from scratch, it would have heightened,

4 even more so, the commercial survival of the Post Office

5 at that time, wouldn't it?

6 A. Yes, it would but that would have had to be faced into,

7 if there was a problem there because, you know, frankly

8 the issues we were facing on Royal Mail were, in terms

9 of cost and investment, far greater than that would have

10 been, so it would have had to have been faced into, and

11 the Post Office, as actually in fairness the Government

12 showed, was not something that the Government was ever

13 preparing to allow to truly fail. It was more

14 a question of what was appropriate in terms of the

15 revenue that was genuinely there versus the desire to

16 obviously allow the Post Office to continue its really

17 valued role as part of the social fabric of the UK,

18 particularly for certain segments of the population.

19 Q. In hindsight though, do you think that, essentially, the

20 existential problems that would have arisen around the

21 failure of Horizon would have been a disincentive to

22 those who'd been present at the difficult birth of

23 Horizon to, as it were, escalate that up, in terms of

24 telling you what went wrong in the early days and what

25 problems there'd been with Horizon in its development

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1 were giving to Mr Beer you said this, you said that, if

2 you were worried about the performance, if you thought

3 there were issues, why wouldn't you get someone from

4 outside in to look at that and give you a genuine

5 independent view of what the problem was? Mr Beer was

6 asking you questions about difficulties add failures in

7 the Horizon system.

8 Mr Crozier, there were people who were raising

9 queries about the performance of Horizon. They were

10 subpostmasters/mistresses, they were trying to do that

11 in the time that you were in charge by phoning the

12 helpline and saying, "We've got a problem, this thing's

13 got a shortfall. It's not my fault. There's something

14 wrong with the machine".

15 Do you know what they were told, Mr Crozier, during

16 your period? They were told to pay up, pay up for that

17 supposed shortfall. So people did raise problems with

18 Horizon system, they were the subpostmasters that were

19 under your care; what do you think about that?

20 A. I think that's obviously entirely wrong. I would have

21 expected -- I thought and would have expected that when

22 people raised issues, these would be openly and fairly

23 looked at. I know, from the evidence I've been sent,

24 that people sent letters which the Post Office team

25 replied to. I always assume, because I do it myself --

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1 and rollout before you arrived?

2 A. I'm not sure I do agree with that, if I'm being honest.

3 You know, I wasn't aware that Horizon had had this very

4 difficult birth, for want of a better phrase, but all IT

5 systems constantly need improving and fixing, and the

6 company in full mode was trying to fix everything. And

7 I do like to think -- I know this is incredibly easy to

8 say now, I hasten to add -- that if we had been aware

9 that there was a real issue that needed fixing I think

10 collectively people would have figured out a way to

11 tackle that and I think that case would have had to have

12 been made by the Government because, in the end, it

13 would have been more important to get it right.

14 So I still believe, whatever the difficulties, if

15 people genuinely felt there were problems, they should

16 have said something.

17 Q. If people knew of the problems before you arrived --

18 A. Yeah.

19 Q. -- should they have said something about that to you?

20 A. I certainly wish they had.

21 MR MOLONEY: Thank you, Mr Crozier.

Questioned by MR STEIN

23 MR STEIN: Mr Crozier, I represent a large number of

24 subpostmasters and mistresses.

25 Towards the end of the evidence and the answers you

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1 I wouldn't send or sign a letter that I didn't believe

2 in, so I assumed that people will check those things out

3 properly, and I assumed that they would handle those

4 professionally and openly and ensure that any issues

5 that were raised were investigated properly.

6 Q. You probably heard, Mr Crozier, that what happened was

7 that, because subpostmasters and mistresses were being

8 told to pay up -- it's your contractual duty, they were

9 told, to pay up -- and many of them did, paying out for

10 shortfalls that were certainly not their fault. They

11 got that money from their own pockets, they got that

12 money sometimes from borrowing from friends, some, you

13 may recall, got that money from their kids' piggy banks,

14 others got money from loan sharks at extortionate

15 interest rates, tipping them into financial chaos and

16 bankruptcy.

17 Now, help us please understand what happened to that

18 money when it was paid in? Was it properly accounted

19 for, this money paid into balance supposed shortfalls?

20 A. I assume it was, through the financial team.

21 Q. Was it accounted for as profit?

22 A. I don't know.

23 Q. Well, the very early part of the questions being asked

24 by Mr Beer, he asked you a number of questions about the

25 corporate directorial responsibility and part of the

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1 director's responsibility is a responsibility over the
 2 accounts of a business; is that agreed?
 3 **A.** Yes, it is.
 4 **Q.** It is. It would be wholly wrong, would you agree, to
 5 account for a payment for a shortfall as profit; do you
 6 agree with that?
 7 **A.** I'm not an accounting expert, so no, I don't --
 8 I wouldn't know exactly how you would account for
 9 different payments in different --
 10 **Q.** Your background is you have a business qualification,
 11 I believe --
 12 **A.** I do, I do.
 13 **Q.** -- and you've obviously worked at senior levels --
 14 **A.** I have but --
 15 **Q.** -- and you have an understanding of accounts, don't you,
 16 and you have a responsibility to read those accounts,
 17 don't you?
 18 **A.** I do.
 19 **Q.** Yes, one of the accounts kept by a business is the
 20 profit and loss account; do you agree?
 21 **A.** It is.
 22 **Q.** Right, so money being paid in by a subpostmaster on
 23 being told "You need to pay up, for a supposed
 24 shortfall", is that a profit, Mr Crozier?
 25 Machine is saying "There's something wrong here,"
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1 at Post Office and the Royal Mail --
 2 **Q.** Forgive me for interrupting you.
 3 **A.** It's okay.
 4 **Q.** Because this period of time we're talking about, which
 5 Mr Beer has emphasised, was a period of time for the
 6 Post Office and RMG where the business was financially
 7 in trouble?
 8 **A.** Indeed.
 9 **Q.** It was a period of time whereby Post Office branches and
 10 numbers of them were being cut, yes?
 11 **A.** Yes.
 12 **Q.** So the question of these costs, costs being put in these
 13 accounts, would have been under some scrutiny, wouldn't
 14 they?
 15 **A.** Yes, they would. There was reference to some of them in
 16 the papers that have been sent through, yes.
 17 **Q.** So one of the ways to get information about what is
 18 happening within the business will have been through the
 19 scrutiny of accounts; do you agree?
 20 **A.** Yes.
 21 **Q.** If money has been taken from subpostmasters for errors
 22 made by the Horizon system and been put into the profit
 23 accounts of Post Office, that would be wrong and
 24 dishonest, wouldn't it, Mr Crozier?
 25 **A.** Well, I don't know if it was, so it's difficult for me
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1 there's £100,000 wrong". That subpostmaster, using my
 2 example, is then paying that large sum of money in. Is
 3 that actually meant to be recorded as a profit,
 4 Mr Crozier?
 5 **A.** I suppose it depends what it's replacing. I don't know.
 6 **Q.** Shouldn't it be on the balance sheet? Because, in
 7 theory, it's creating the opposite side to the loss?
 8 **A.** I assume so, yes.
 9 **Q.** Yes. That's where it should be. Now, the Directors of
 10 Post Office Limited should have had their eye on these
 11 accounts, shouldn't they?
 12 **A.** Yes.
 13 **Q.** The second reason for them to have eye on the accounts
 14 is on the costs of the legal actions being taken against
 15 subpostmasters, do you agree?
 16 **A.** I would agree, yes.
 17 **Q.** Because that's a way of looking at and tracking the
 18 money that was being paid for the expensive costs of
 19 taking people to court, or the cleaners.
 20 Now, those directors, including yourself, from the
 21 RMG Board level, did you pay attention to the costs, the
 22 legal costs being spent on those people being
 23 prosecuted, the legal costs of those people being taken
 24 to the civil courts?
 25 **A.** They would have been taken in the round, I suspect, both
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1 to comment.
 2 **Q.** If it was, Mr Crozier it would be wrong and dishonest,
 3 wouldn't it?
 4 **A.** On the face of it, yes, but, again, I don't know how
 5 that was treated.
 6 **Q.** Lastly, you heard the evidence of Lord Justice Hooper,
 7 who gave evidence earlier this week, he said that, on
 8 a number of occasions when he was trying to investigate
 9 such matters, he asked for the accounts, tried to find
 10 out where the money went and he never got a satisfactory
 11 answer. He never saw those accounts. Do you know why?
 12 **A.** When was this, sorry?
 13 **Q.** This was later on after your time?
 14 **A.** Okay.
 15 **Q.** He was after the very sorts of accounts that I've been
 16 describing.
 17 **A.** Right.
 18 **Q.** Do you know why he wasn't given those accounts?
 19 **SIR WYN WILLIAMS:** I don't see how Mr Crozier can possibly
 20 answer that, since he had gone four years previously.
 21 **MR STEIN:** I understand, sir, you're right.
 22 Where were those accounts kept, Mr Crozier? The
 23 accounts that relate to profit and loss and balance
 24 sheets? Where were they kept; were they kept at
 25 Chesterfield?
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1 **A.** Well, obviously all the information was also held at the
 2 Head Office.
 3 **Q.** Now, so far, we've heard from a number of people in
 4 relation to POL and RMG and it appears that nobody took
 5 responsibility for the prosecution of subpostmasters,
 6 nobody took oversight of it, nobody at all. Are you
 7 proud of that?
 8 **A.** No.
 9 **Q.** How much were you paid during your period of time as
 10 chair of RMG?
 11 **A.** I'd need to look back. I don't know; I'm sure it's
 12 absolutely available in all the annual reports.
 13 **Q.** It's in millions, isn't it, Mr Crozier?
 14 **A.** Yes, it probably is, yes.
 15 **MR STEIN:** Thank you.
 16 **SIR WYN WILLIAMS:** Thank you, Mr Crozier.
 17 That brings to an end today's session. We will
 18 resume again --
 19 Oh, sorry, I should formally thank you for your
 20 witness statement and thank you for answering so many
 21 questions during the course of today.
 22 So we'll resume, again, at 10.00 on Tuesday,
 23 I think, with Mr Miller, is it, Mr Beer?
 24 **MR BEER:** That's right, we've got David Miller first and
 25 then David Mills second.

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1 **SIR WYN WILLIAMS:** How squeezed are we for time? We have
 2 two witnesses and it's becoming clear to me that two
 3 witnesses is a stretch, on occasions, in one day.
 4 **MR BEER:** Yes, we'll review that, sir, in the light of
 5 experience.
 6 **SIR WYN WILLIAMS:** Thank you. See you all on Tuesday.
 7 **MR BEER:** Thank you very much, sir.
 8 (3.48 pm)

(The hearing adjourned until 10.00 am
 on Tuesday, 16 April 2024)

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