

Friday, 3 February 2023

(10.00 am)

MR BEER: Good morning, sir. Can you see and hear me?

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

MR BEER: May I call Andrew Winn, please.

ANDREW FRANK WINN (affirmed)

Questioned by MR BEER

MR BEER: Good morning, Mr Winn. My name is Jason Beer and, as you know, I ask questions on behalf of the Inquiry.

Can you give us your full name, please?

A. Andrew Frank Winn.

Q. Thank you. Many thanks for coming to give evidence to the Inquiry today and for the provision of two witness statements. Can I deal with your first witness statement first, please. It should be in the hard copy bundle in front of you at tab A1. It's 24 pages in length and is dated 26 December 2022. Do you have that?

A. Yes.

Q. For the transcript the URN is WITN01090100. Can you go to the 24th page of it, please.

A. Yes.

Q. Is that your signature?

A. Yes.

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

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individual subpostmasters, as that will be a matter addressed in Phase 4 of the Inquiry, or in relation to investigations that took place after the scandal broke. That may be addressed in Phase 5 of the Inquiry and you may be recalled within it. There may be some questions that do touch on those matters but only where it's necessary to understand and explore your evidence on Phase 3 issues. Do you understand?

A. Yes.

Q. Thank you. Can I start with your background and experience. I think you worked for the Royal Mail Group and then the Post Office for 20 years between 1996 and 2016; is that right?

A. That's correct.

Q. Have you any professional qualifications that are relevant to the issues that we're considering today?

A. No.

Q. You say in your witness statement that you started working for the Post Office or Post Office Limited in around 2001. Before that time, what was your role within Royal Mail Group?

A. I started off as a postman, part-time postman. Then I worked in a management reporting role. Then I worked in an audit role and, from there, I moved into Post Office Limited.

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A. Yes.

Q. Thank you. A copy of that witness statement will be uploaded to the Inquiry's website and therefore I'm only going to ask you questions about selected parts of it. Can we turn to the second witness statement, please. That's four pages in length and was signed by you today. Can you look at the fourth page, please, and tell me whether that's your signature?

A. Just give me a moment. I'm struggling with my folder here. Sorry, where is it?

Q. I think it's immediately after the first witness statement.

A. Yes.

Q. Is that your signature on the fourth page?

A. Yes.

Q. The URN for that is WITN01090200. Are the contents of that witness statement true to the best of your knowledge and belief?

A. Yes.

Q. Thank you very much.

I'm going to ask you, Mr Winn, questions about the matters that arise in what we in the Inquiry are calling Phase 3 of the Inquiry.

I'm not going to ask you any detailed questions today about cases involving the prosecution of

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Q. What was the audit role?

A. Initially it was with Parcelforce, which largely involved checking out individual branches, depots, checking the records, et cetera, and then we moved into a group audit. It consolidated into a group audit and that would involve going into all the different areas of the business, usually in groups and carrying out audits of what was going on there.

Q. Before 2001, before you took up your role in the Post Office in 2001, did your role require you to have any involvement with the Horizon System?

A. No, I believe not.

Q. Before you took up your role in the Post Office in 2001, what did you know, if anything, about the Horizon System?

A. Nothing.

Q. If you can just maybe move forward slightly so that the microphones pick up your voice. You will see that the Chairman is listening remotely and the proceedings are broadcast and so it's really important that the microphones pick up what you say.

A. Okay, sorry.

Q. So the answer was "Nothing" I think.

A. Correct.

Q. Thank you. So does it follow that before you took up

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

23

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

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

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

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

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

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

1 correction, debt reporting and debt recovery area on the
 2 POL Network."
 3 Then thirdly:
 4 "Analyse and then recommend cost effective
 5 improvements to the way the correct end-to-end
 6 transaction correction, debt reporting and debt recovery
 7 operating processes work."
 8 So it's focused, is this right, on looking at the
 9 way that the systems were working at that time?
 10 **A.** Yes, it sounds very much as though that's -- I've been
 11 put in a role, I've had conversations with my boss and
 12 probably other people within P&BA, and pulled together
 13 a what do I think this role involves.
 14 **Q.** Not just what does it involve, but look at ways in which
 15 it could be changed, in order to make cost effective
 16 improvements --
 17 **A.** Yes.
 18 **Q.** -- to save money?
 19 **A.** I think everything you do, you're looking at working as
 20 efficiently as possible. I don't think it was
 21 particularly a brief to come in and find ways of cutting
 22 down our costs.
 23 **Q.** Now, the Inquiry's heard some evidence from a previous
 24 witness, Ms Susan Harding; do you remember her?
 25 **A.** Yes.

1 going to be trying to focus on and probably some things
 2 are going to become more important than others as we go
 3 along. But that's probably the list of to-dos that were
 4 being agreed.
 5 **Q.** What did you mean by the second bullet point "Branch
 6 Trading forces [transaction correction] acceptance"?
 7 **A.** So every month a branch is required to carry out
 8 a branch trading process where effectively they pulled
 9 everything together, ideally everything balances, they
 10 have a nice zero at the bottom and we move on to the
 11 next trading period.
 12 The transaction corrections can be issued at any
 13 time and there was a significant issue with the branches
 14 expressed particularly through the NFSP about -- well,
 15 sorry, just re-track a little bit. Branches used to,
 16 pre-Horizon days, used to balance weekly and it was
 17 still recommended to do a balance, not a complete
 18 balance but a kind of summary balance, to try and get
 19 a view of where they were, but the primary balance was
 20 held monthly.
 21 There was a kind of half-hearted -- what seemed to
 22 be a half-hearted claim that you only issue transaction
 23 corrections on a Tuesday so we get it on a Wednesday
 24 morning when we've got to do the balancing, and
 25 I actually did a bit of exercise to disprove that and it

1 **Q.** What do you remember her as, a role that she performed?
 2 **A.** She was actually my -- for a while in the network
 3 intervention team, we talked about earlier, the previous
 4 team that I was in.
 5 **Q.** She told the Chairman that subpostmasters were never
 6 forced to settle centrally. Can we just look at page 3
 7 of this document, please. You in the first bullet point
 8 ask "What is 'Settle Centrally'?" and then say:
 9 "Branch Trading forces [transaction correction]
 10 acceptance."
 11 **A.** Yes.
 12 **Q.** "Inadequate [transaction correction]
 13 evidence/instructions.
 14 "Unclear process.
 15 "Non-conformance not addressed.
 16 "New subpostmasters.
 17 "Aged/High Value/High Volume [transaction
 18 corrections]."
 19 Overall, without coming to the detail of each
 20 bullet point first, what are you speaking about? Can
 21 you explain what is being said in this slide of yours?
 22 **A.** I think I'm saying that I got into this role, I've had
 23 a look at what areas we can make improvements on and
 24 what is going to be priority ones, where it is a lack of
 25 understanding, and these are the kind of things I'm

1 turned out we did issue the most transaction corrections
 2 on a Tuesday. There may -- it wasn't significantly
 3 relevant compared to Wednesday or Thursdays.
 4 But on branch trading, on the monthly branch
 5 trading, everything kind of has to be cleaned up, so
 6 that would mean any transaction corrections that are
 7 outstanding needed to be accepted before you could roll
 8 into the next trading period.
 9 **Q.** By "accepted", you mean accepted by the subpostmaster?
 10 **A.** Yes.
 11 **Q.** So what is the bullet point is saying is that the action
 12 of branch trading, the monthly reconciliation process,
 13 is forcing subpostmasters to accept transaction
 14 corrections that the centre is putting to them?
 15 **A.** Yes.
 16 **Q.** Were you saying that's a good thing or a bad thing?
 17 **A.** I was saying it was -- I don't think it was a good
 18 thing.
 19 **Q.** Why wasn't it a good thing?
 20 **A.** Because branches would potentially walk in on
 21 a Wednesday morning of balance day, turn the Horizon on,
 22 first thing they see is a transaction correction come
 23 through, they know they have got a balance on the night,
 24 they've got to understand what the transaction
 25 correction is and, if it's particularly one that's

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

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

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

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

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

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

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

25 Why would you reject the idea of a dispute button

1 A. Yes.

2 Q. Your note continues:

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

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

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

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

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

18 Q. The note continues:

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

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

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

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

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

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

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

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

21 A. Sorry can you repeat that?

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

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

10 Q. On that last note you say:

11 "Robust dispute process is the answer."

12 A. Yes.

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

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

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

20 A. Fair, accurate, timely.

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

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

1 a batch, they might issue a consolidated transaction
 2 correction which showed the net effect of the bulk
 3 error.
 4 Both kind had kind of quite eloquently described
 5 their rationale behind what they were doing in terms of
 6 how the subpostmaster saw it, and I could totally
 7 understand -- it wasn't clear to me whether it was
 8 better for a subpostmaster to see everything on the one
 9 transaction correction or lots of different individual
 10 transaction corrections. So that was the issue with
 11 that one.
 12 A better example might be the Lottery team where
 13 there was a big issue accurately recording the Lottery
 14 and a lot of that was around the fact that Lottery was
 15 typically sold a lot on the retail side, as opposed to
 16 the Post Office side, and there was the problem of
 17 getting the data across to the Post Office side in time
 18 to be reported before cut-off time, which I think was
 19 7.00.
 20 So it was fine for the branch offices that
 21 everyone shut up at 5.30, everything was accounted for.
 22 Branches that their retail side particularly would be up
 23 until 10.00 at night were missing the cut-off.
 24 So what we found was that lots of branches were
 25 making lots of errors, which were really just timing
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1 below, please. Thank you.
 2 Looking at the notes below, these suggest that the
 3 Post Office, I think, was concerned about its own
 4 practices and the inconsistency of them towards
 5 transaction corrections, including the operation of back
 6 office systems including IMPACT; is that right?
 7 **A.** Yes, it looks like it.
 8 **Q.** We can see in the first note:
 9 "Varying [transaction correction] routines -- one
 10 of the clear ideals I had on setting out and from others
 11 who I spoke to was consistency."
 12 But then you noted:
 13 "But then most teams have completely different
 14 approaches to identifying errors and resolving them --
 15 and for good reasons."
 16 So was there an inconsistency of approach within
 17 P&BA to identifying errors and resolving them at
 18 Chesterfield?
 19 **A.** I don't think it was so much identifying and resolving
 20 them -- well, identifying them, I don't think was so
 21 much of an issue. I think it was more about -- if I can
 22 give one example, within I think it was the cheques team
 23 at the time where one duty would issue a transaction
 24 correction for every cheque error and another duty might
 25 issue a consolidated -- so if there was a problem with
 42

1 errors and we could have been in a situation of issuing
 2 every day a transaction correction and then the next day
 3 a transaction correction would be coming back which
 4 would compensate for the errors.
 5 **Q.** So cutting through it, what were the good reasons for
 6 the completely different approaches to identifying
 7 errors and resolving them?
 8 **A.** The different requirements and the different attributes
 9 or problems of the products and how the team saw best to
 10 deal with them.
 11 **Q.** This suggests that there was a difference between teams;
 12 is that right?
 13 **A.** In their approach but, essentially, the difference --
 14 the teams were doing the same thing. They were looking
 15 at an account, where there was -- where it wasn't
 16 netting off to zero and their kind of goal in life,
 17 I guess, was to get that account down to zero.
 18 **Q.** Moving a bullet point on underneath:
 19 "POLFS -- space/access to reference data/different
 20 transactions used by different teams."
 21 Can you shortly explain what POLFS was?
 22 **A.** POLFS, I think, was a name for Product & Branch
 23 Accounting.
 24 **Q.** Were you concerned about the limitations of or within
 25 Product & Branch Accounting, in being able to
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1 investigate errors and resolving them?
 2 **A.** I think -- I can't remember exactly when this was but --
 3 **Q.** January 2009?
 4 **A.** Okay. So at that point, there would be, in many of the
 5 teams, quite large backlogs and, clearly, if you have
 6 got a large backlog of work, you'd like more resource to
 7 help clear it but there were limitations.
 8 **Q.** I think that might be a different issue. Isn't this
 9 talking about the extent to which this back office team
 10 had access to all of the data generated by both the POL
 11 back office systems and by Horizon, for the purposes of
 12 an investigation into the validity of a transaction
 13 correction or a discrepancy?
 14 **A.** Their checking a transaction correction would be about
 15 what there is in POLFS. Sorry, POLFS is the Finance
 16 System, isn't it? Sorry, I do beg your pardon. It
 17 would be about what's in the Finance System not
 18 particularly what was on the Horizon System because the
 19 Horizon System should -- if this has happened on
 20 Horizon, then this data should then flow into this point
 21 within POLFS.
 22 **Q.** You are speaking to the limitations of POLFS here. What
 23 were the limitations of POLFS?
 24 **A.** I'm sorry, I can't recall what I was thinking of at that
 25 point.

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

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

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

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1 a limited number of products, then you won't be aware of
 2 what's going on there and if you're being told "Clear
 3 this account down", then you're not going to trot off to
 4 the other side of the room and have a conversation "Have
 5 you got a matching item to this, because I think" --
 6 some people will do that anyway; other people wouldn't.
 7 Q. In this sentence, were you reflecting the fact that in
 8 the team as you saw it there was no incentive to seek
 9 out corrections that had the effect of benefiting
 10 subpostmasters?
 11 A. I would say that's correct, yes.
 12 Q. Can we turn to page 6, please:
 13 "Key Recommendations -- Existing Processes."
 14 Under the third of them:
 15 "Define 'settle centrally'.
 16 Then scroll down to the notes, please, and the
 17 third point under your notes you say:
 18 "Define Settle Centrally -- legally they have
 19 accepted the debt. But would a court wear it? Need
 20 some assurances around it."
 21 Can you just explain what "settle centrally" was,
 22 please?
 23 A. Settle centrally was an option where a discrepancy arose
 24 either through accepting a transaction correction or as
 25 a cash balance at the end of the branch trading.

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1 Q. -- secondly, pay up by cheque; or, thirdly, settle
 2 centrally?
 3 A. Yes.
 4 Q. They were the only three options?
 5 A. I think multiple branches might have had a different way
 6 of doing it and, certainly, Crown Offices had
 7 a different approach. But your bog standard
 8 subpostmaster --
 9 Q. They were the three options?
 10 A. -- they were their options, yes.
 11 Q. So the first two involved the payment or the promise of
 12 payment of money through a cheque, yes?
 13 A. Yes.
 14 Q. The third option, settle centrally, you note:
 15 "... legally they [that's the subpostmasters] have
 16 accepted the debt."
 17 A. That was -- I've got no legal training whatsoever so
 18 that was my understanding of -- and also like the
 19 NFSP -- I think everybody's understanding was, if you
 20 accepted that TC, you have accepted it.
 21 Q. Where did you get that understanding; where did everyone
 22 get that understanding from?
 23 A. I couldn't specifically answer that.
 24 Q. If you had that understanding and everyone in P&BA had
 25 that understanding, did you communicate that to

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

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

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

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

25 A. Yes.

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1 subpostmasters or their representatives when they spoke
 2 to you, "But hold on, by asking to settle centrally you
 3 have legally accepted the debt"?
 4 A. No, I would never say that.
 5 Q. Why not, if that was your belief?
 6 A. Because that wasn't my -- my approach was to make sure
 7 that the subpostmasters and POL were treated correctly,
 8 that things were done correctly.
 9 Q. Why were you asking the question "would a court wear
 10 it"?
 11 A. Because of some of the problems that we've already
 12 discussed. Branches are obliged to settle -- to accept
 13 transaction corrections, which they may not think is
 14 proper to them at the time, to get -- okay, they might
 15 not want to pay the £200 straight away but they will
 16 settle centrally, which defers and gives them a chance
 17 to challenge. But my non-legal opinion is that, in
 18 a court of law, if a subpostmaster went into a court
 19 saying, "Look, I was forced to settle centrally, I had
 20 to settle centrally, the Post Office is now trying to
 21 recover this money, this is the evidence that I have
 22 that says it's not correct", in my view, the court would
 23 say, "Well, yeah, you're right, the Post Office is
 24 wrong".
 25 Q. You knew, I presume, that the IMPACT Programme had

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

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

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1 lay out their responsibilities as well as ours. How
 2 does a dispute become formal? They need to present
 3 evidence."

What does "dispute pre-DFR" mean, please?

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

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

But I would send -- potentially send an Excel
 spreadsheet to branches where they could look at the
 transactions in a better format than what Horizon
 reporting would come up and they could have a look and

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1 say if there's any transaction -- and I'd suggest "Look,
 2 you know, there's this transaction, is that going to be
 3 right; is this transaction going to be right? Have
 4 a look at this one or -- but have a look at them all,
 5 see if there's any transactions that you don't recognise
 6 that you think is suspicious, where there might be
 7 miskeying, have I missed anything?"
 8 Q. You were working only from the data that Horizon itself
 9 produced?
 10 A. Yes.
 11 Q. What if that data was wrong?
 12 A. Then I'd be looking for a branch to say something like,
 13 "The butcher always comes in at 3.30 and makes a cash
 14 deposit and there isn't one there". So we need to
 15 understand did the butcher actually come in that day or
 16 he did and there's no record of it on Horizon, or
 17 there's a transaction here which I don't recognise, that
 18 hasn't happened.
 19 I can't recall that actually happening.
 20 Q. Can we, just before the morning break, look at the last
 21 page of this document, please, page 7. The first bullet
 22 point:
 23 "Remove second reminder letter" and then look at
 24 the notes underneath:
 25 "Recovery -- remove one letter in process -- not
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1 right?
 2 MR BEER: Yes, please.
 3 SIR WYN WILLIAMS: Fine.
 4 (11.32 am)
 5 (A short break)
 6 (11.48 am)
 7 MR BEER: Good morning, sir. Can you see and hear me okay.
 8 SIR WYN WILLIAMS: Yes, I can thank you.
 9 MR BEER: Thank you very much.
 10 Mr Winn, I want to look at something called the
 11 receipts/payments mismatch book. Can we start by
 12 looking at POL00028838. Thank you very much.
 13 These appear to be notes about a meeting to
 14 discuss the receipts/payments mismatch bug. Can you see
 15 at the top "Receipts/Payments Mismatch issue notes"?
 16 A. Yes.
 17 Q. We can see that the attendees at a meeting to discuss
 18 the receipts and payments mismatch issue include you?
 19 A. Yes.
 20 Q. "Andrew Winn (AW) POL Finance". We can also see that
 21 Mr Jenkins from Fujitsu was there, yes?
 22 A. Yes.
 23 Q. Can I just deal with the date of this meeting first.
 24 This document is not dated and does not itself identify
 25 the date of the meeting but if we look at page 3 of the
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1 contractual and adds no value. People either pay up or
 2 hang out to DFR -- may as well get there."
 3 Were you by this saying that a step in the process
 4 should be removed so that you could get to debt recovery
 5 from the subpostmaster sooner rather than later?
 6 A. Yes.
 7 Q. Is that a reflection of pressure to recover, from
 8 subpostmasters, debts?
 9 A. No. No, I would say it was more a case of we'd done
 10 some analysis and found out that people paid the debts
 11 straight away, or once we sent a letter, they paid the
 12 debt. The second letter didn't make any difference.
 13 They obviously didn't get the second letter if
 14 they'd already paid. If they hadn't paid, they didn't
 15 start paying. So there was no benefit in sending that
 16 out. It saved resource within the team and, yes, it
 17 would have had an impact on the bottom line but it would
 18 have been pretty marginal.
 19 Q. And the "may as well get there", you're saying you may
 20 as well get to taking money from subpostmasters' wages
 21 sooner rather than later?
 22 A. Yes.
 23 MR BEER: Thank you very much. Can we take a break there
 24 for 15 minutes, please?
 25 SIR WYN WILLIAMS: Yes. So that takes us to 11.45; is that
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1 document, we can see in the second paragraph Fujitsu are
 2 writing a code fix which will stop the discrepancy
 3 disappearing, et cetera, et cetera, and then there are
 4 some dates mentioned of 4 October, that's 2010, and then
 5 a date of 11 October, 21 October, yes?
 6 A. Yes.
 7 Q. Then if we go to page 4, on this page and on the next
 8 page there are a series of actions. Would these be
 9 actions arising from the meeting?
 10 A. That would seem sensible.
 11 Q. You can see that there are target completion dates
 12 ranging between 6 and 8 October.
 13 A. Yes.
 14 Q. Would it follow from this that the meeting is likely to
 15 have taken place in September 2010 or early October
 16 2010?
 17 A. I'm not sure where the years come from. I'd say
 18 September certainly but -- have we seen the year?
 19 Q. We haven't seen a year but we know that this bug was
 20 only discovered in that year and therefore I'm taking
 21 that as the year.
 22 A. I've got nothing to argue with there.
 23 Q. Okay. Can we go back to page 1, please, and look at the
 24 nature of the receipts and payments mismatch bug. If we
 25 look at page 1, underneath the table, under the
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1 cross-heading "What is the issue?" it reads:
 2 "Discrepancies showing at the Horizon counter
 3 disappear when the branch follows certain process steps,
 4 but will still show within the back end branch account.
 5 This is currently impacting circa 40 Branches since
 6 migration onto Horizon Online, with an overall cash
 7 value of circa [£20,000] loss. This issue will only
 8 occur if a branch cancels the completion of the trading
 9 period, but within the same session continues to roll
 10 into a new balance period."

11 Then if we go on to page 2, please, in the middle
 12 in bold, I think it's in bold, anyway:

13 "Note the Branch will not get a prompt from the
 14 system to say there is a Receipts and Payments mismatch,
 15 therefore the Branch will believe they have balanced
 16 correctly."

17 Then under lastly "Impact" at the foot of the
 18 page, the first two bullet points:

19 "The branch has appeared to have balanced whereas
 20 in fact they could have a loss or a gain."

21 And:

22 "Our accounting systems will be out of sync with
 23 what is recorded at the branch."

24 Does all of the information in those three places
 25 accurately and fairly describe the nature of what was

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1 "I'm fine, I've got nothing to put in, take out,
 2 whatever. I've balanced to the penny, that's great,
 3 press rollover", and then a statement will roll out but
 4 whether it's actually reviewed in detail, I would say
 5 not.

6 I've got to apologise, I may be wrong on that, but
 7 that's my memory from the receipts and payments
 8 mismatch.

9 Q. Would you accept that the contemporaneous evidence
 10 suggests that it was believed that there wouldn't be
 11 anything in branch to show the branch that they had not
 12 balanced?

13 A. I think -- I'm surprised about that. I think the branch
 14 trading statements would show -- whether the branch
 15 would be able to interpret it as not balancing, I'm not
 16 sure. I couldn't say that. But I think branches would
 17 believe, from the branch trading process, they had
 18 balanced and I believe a lot of branches did not
 19 routinely check over their branch trading statements
 20 when it balanced. But that's --

21 Q. Just one final point at this. We could look at another
 22 place at the top of this page:

23 "Note at this point nothing feeds into POLSAP and
 24 Credence, so in effect the POLSAP and Credence shows
 25 discrepancy whereas the Horizon System in the branch

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1 then understood about the receipts and payments mismatch
 2 issue?

3 A. Yes, I think so, although my memory of the receipts and
 4 payments mismatch would be that the branch trading
 5 statements would show a compensating figure. I can't
 6 remember where it would be. It's not something I would
 7 expect branches to see and they would believe that
 8 they'd balanced correctly but, if my memory serves
 9 correct, on the branch trading statement there would be
 10 a value showing.

11 Q. If that memory is correct, why does this say the
 12 opposite?

13 A. That's a very good question, although it doesn't say
 14 anything about the branch trading statement.

15 Q. That would be the obvious place where a loss or a gain
 16 would be shown and this is saying that the branch won't
 17 get a prompt and the branch will believe they have
 18 balanced correctly and under "Impact:

19 "The branch appears to have balanced, whereas in
 20 fact they could have a gain or a loss."

21 A. I think my memory as it is would be that when you get,
 22 towards the end of your branch trading statements, your
 23 final kind of thing before rolling is to say "This is
 24 the balance" or "There is no balance". So I think that
 25 is the point that subpostmasters would look at and say

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1 doesn't. So the branch will then believe they have
 2 balanced."

3 Does that help you with some further -- a further
 4 contemporaneous record to suggest that the branch will
 5 believe they have balanced, whereas, in fact, they have
 6 not?

7 A. Yes, I would -- that does suggest it's not that I'm
 8 mistaken, it wasn't shown on the branch trading
 9 statement. My main recollection is that the balancing
 10 amount showed in a discrepancy account within POLSAP.
 11 So I would accept that it may not have shown, I'm
 12 mistaken on my memory of that.

13 Q. I understand, thank you.

14 Can we look at the date of discovery of the
 15 receipts and payments mismatch bug and can we look,
 16 please -- well, can you remember when you attended this
 17 meeting for how long the payments and mismatch bug had
 18 been discovered or was this the first that you became
 19 aware of it?

20 A. I must have been. I wouldn't have just gone to
 21 a meeting without knowing anything about it. So I must
 22 have known something beforehand.

23 Q. Can you remember from whom you learnt that?

24 A. No, sorry.

25 Q. Who would it be likely to be?

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1 A. Not sure.

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

3 The top paragraph:

4 "The Receipts and Payments mismatch will result in

5 an error code being generated which will allow Fujitsu

6 to isolate branches affected by this problem, although

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

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

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

10 due course."

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

12 that the problem first began in May and then what

13 response the Post Office got when it challenged Fujitsu

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

15 issues.

16 So firstly the date on which the problem was

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

18 would be just before Horizon Online was accepted in June

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

20 Horizon Online was accepted?

21 A. I don't remember exactly.

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

23 This record here suggests that the problem was

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

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

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

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

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

4 it?

5 A. Correct, yes.

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

7 ever given that information by Fujitsu?

8 A. No.

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

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

11 probably been around since day one?

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

13 Q. Turning to --

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

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

16 to what branches were affected by a receipts and

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

18 correct, the discrepancy would fall into the discrepancy

19 accounts within our team. My worry from that earlier

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

21 flying around into the wrong accounts, and what have

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

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

24 payments mismatch was that it sits there, they have

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

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

2 September/October time, yes?

3 A. Yes.

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

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

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

7 A. Sure.

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

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

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

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

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

13 attended the meeting that you attended, yes?

14 A. Yes.

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

16 page, at the foot of the page:

17 "Jon is easily able to reproduce the problem in

18 a development environment and we are planning to

19 recreate the scenario and attempt a fix in that

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

21 probably worth starting on the data extraction to

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

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

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

25 run the queries the better."

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

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

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

4 issue. So yes, that would worry me.

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

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

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

8 were previously looking at, which was POL00028838, and

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

10 again, in the second line:

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

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

13 will provide feedback in due course."

14 What was done within POL to question why Fujitsu

15 had not reported the problem whenever it began?

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

17 raising that question. I would guess that was someone

18 from the IT team within POL.

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

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

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

22 long to report the issue?

23 A. I would guess Ian Trundell.

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

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

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

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

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

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

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

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

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

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

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1 A. Yes.

2 Q. And the information would be relevant to anyone who had

3 had proceedings brought against them by POL for the

4 recovery of debts, civil recovery?

5 A. Yes.

6 Q. Or who had challenged POL --

7 A. Yes.

8 Q. -- in the courts.

9 Did anyone in the meeting discuss handing that

10 information over to the defence teams?

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

12 Q. When you attended this meeting in September/October

13 2010, I think you were already aware of the prosecution

14 of Seema Misra, weren't you?

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

16 Q. Can we look, please, at POL00055100. Can we look,

17 please, at the middle of the page. We can see this is

18 an email sent to you by Jon Longman on 27 July 2010,

19 concerning the prosecution of Seema Misra at Guildford

20 Crown Court, yes?

21 A. Yes.

22 Q. We're going to come to that in a moment but let's get

23 some context first. Can we look at page 2 of the

24 document, please, and then just scroll down. This is

25 an email from Issy Hogg, she is the defence solicitor,

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1 below following our telephone conversation of today."

2 Then go back to page 1, please, the foot of the

3 page, an email sent on behalf of Mr Singh to Jon

4 Longman. Can you remember who Jon Longman was?

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

6 Q. And Warwick Tatford, he was prosecution counsel in the

7 Seema Misra trial:

8 "I enclose a copy of an email received from Issy

9 Hogg, the defence solicitors of 22 July 2010, the

10 content of which is self-explanatory. Could you please

11 be kind enough to let me have your urgent instructions

12 as to the access and information she is requesting in

13 respect of the system in the Midlands and the operation

14 at Chesterfield and the errors logs. I will contact

15 Gareth Jenkins to find out what transpired at the

16 meeting with Charles McLachlan."

17 Then scroll up, please. We can see that on the

18 same day, about an hour later, Mr Longman forwarded the

19 email to you, yes?

20 A. Yes.

21 Q. Then we can see about 33 minutes later you reply, so at

22 12.13 that day, and you say:

23 "John

24 "Rod Ismay the head of P&BA is not happy at the

25 prospect of an open ended invite. He has asked the

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1 to Jarnail Singh. If we just scroll to the top of the

2 page, we can see on his signature block Jarnail Singh

3 was a senior officer in the Post Office's Criminal Law

4 Division, yes?

5 A. Yes, yes.

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

7 "Jarnail,

8 "As a result of the meeting that took place

9 between Charles McLachlan and Gareth Jenkins as directed

10 by the judge, we now need to have:

11 "access to the system in the Midlands where it

12 appears there are live, reproducible errors.

13 "access to the operations at Chesterfield to

14 understand how reconciliation and transaction

15 corrections are dealt with.

16 "access to the system change requests, Known Error

17 Log and new release documentation to understand what

18 problems have had to be fixed.

19 "Please you contact me with regard to these

20 issues. Please you respond [to an email address]."

21 Yes?

22 A. Yes.

23 Q. Then if we go further up the page, we can see

24 a forwarding:

25 "... please advise on the three points raised

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1 question of what are the legal parameters we are working

2 within. Simplistically if we refuse or impose

3 conditions do we lose the case? I think we need more

4 guidance on how something like this might reasonably

5 operate.

6 "I think Mark Burley would be the route into IT to

7 identify who might be best placed to deal with that

8 aspect."

9 This was a reply that was essentially your boss,

10 Rod Ismay, in P&BA, seeking to close down the disclosure

11 request as much as possible, wasn't it?

12 A. Yes.

13 Q. What reasons did he give to close down the disclosure

14 request as much as possible?

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

16 Q. What was the nature of his unhappiness about the

17 disclosure request?

18 A. I think he didn't feel as though it would produce

19 anything and create more questions than it would answer.

20 Q. What kind of questions would it create?

21 A. I can't recall. I don't think he specified. I think

22 that was probably a generic term or --

23 Q. Was it a generic reply "Don't let them have access to

24 systems or data that would reveal issues or problems

25 with our system"?

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

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

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

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

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

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

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1 refusing access that was sought by the defence?

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

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

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

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

13 A. That was never stated, no.

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

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

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

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

7 A. Yes.

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

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

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

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

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

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

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

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

4 A. Yes.

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

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

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

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

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

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

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

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

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1 question. That was Rod's view. I didn't have a strong
 2 enough view to argue against it.

3 Q. Were these requests by defence solicitors for access to
 4 systems and data on your mind when considering whether
 5 and how to communicate with affected subpostmasters and
 6 others the discovery of the receipts and payments
 7 mismatch bug in the September/October meeting?

8 A. No.

9 Q. Can we go back, please to Fujitsu 00081584. That's an
 10 errant reference. I'm going to stick with the version
 11 of the document I've been using, POL00028838, the second
 12 page, please. At the foot of the page under "impact",
 13 the third bullet point:

14 "If widely known, could cause a loss of confidence
 15 in the Horizon System by branches. Potential impact
 16 upon ongoing legal cases where branches are disputing
 17 the integrity of Horizon data."

18 This appears to be a record that those two things
 19 were brought into account at the meeting. Can I ask
 20 again: were the discussions over the defence requests
 21 for access to Horizon systems and data on your mind when
 22 considering whether to communicate with subpostmasters
 23 and others about the discovery of the receipts and
 24 payments mismatch bug?

25 A. No.

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1 A. Not that I'm aware of.

2 Q. If we just go on to page 6 of the document, this is the
 3 Gareth Jenkins document that we mentioned earlier. We
 4 know that this was sent on to the solicitor with the
 5 conduct of the Seema Misra prosecution, Jarnail Singh,
 6 on Friday, 8 October before her trial started on Monday,
 7 11 October.

8 We can see that if we just go to the foot of the
 9 page, please. Do you see the file string at the foot of
 10 the page showing the presence of the document in
 11 a Jarnail Singh folder and that it was printed on
 12 8 October?

13 A. Yes.

14 Q. I won't turn it up now but there's also an email. I'll
 15 give the reference for the transcript, POL00055410,
 16 which shows this document being sent to Mr Singh.

17 Was there discussion at the meeting of the need to
 18 disclose information that Mr Jenkins had to the
 19 prosecution solicitor in the Seema Misra case?

20 A. I don't recall. I don't recall that case being raised
 21 in this meeting.

22 Q. We know that neither Mr Singh nor Mr Jenkins disclosed
 23 information about the receipts and payments mismatch bug
 24 to Ms Misra's defence team or indeed to the court. Was
 25 that discussed in the course of the meeting, whether

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1 Q. What's this referring to then?

2 A. Sorry, I don't really understand which we're going.

3 Q. We've seen that at two points, once in July and once in
 4 September, you were involved in conversations over
 5 defence access to systems and data on behalf of
 6 a subpostmistress who said the data provided by Horizon
 7 is not accurate. You're in a meeting about data
 8 provided by Horizon not being accurate and there's
 9 a record saying it has a potential impact upon ongoing
 10 legal cases where branches are disputing the integrity
 11 of the Horizon data.

12 I'm asking you were the requests that you received
 13 for access on your mind when you were considering the
 14 potential impact on legal cases that's recorded at this
 15 meeting?

16 A. I would probably say no.

17 Q. Was the discussion at this meeting over whether
 18 Mr Jenkins was going to give evidence in Seema Misra's
 19 trial in October 2010?

20 A. I've no idea.

21 Q. Was anything said about the Seema Misra case in this
 22 meeting?

23 A. I wouldn't have thought so.

24 Q. Were any decisions made about the disclosure of the
 25 existence of the bug to the defence team?

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1 that information should be disclosed or not?

2 A. Again, I don't remember this ex-subpostmaster being
 3 mentioned in the meeting.

4 Q. Can we go to page 2 of the document, please, and look at
 5 the foot of the page. We've dealt with the first five
 6 bullet points. Can I deal with the last -- sorry, we've
 7 dead with the first four bullet points. Can we deal
 8 with the last, the fifth:

9 "It could provide branches ammunition to blame
 10 Horizon for future discrepancies."

11 Was that a consideration?

12 A. Yes.

13 Q. So disclosure could provide branches with ammunition to
 14 blame Horizon?

15 A. Yes.

16 Q. It would be accurate ammunition, though, wouldn't it?

17 A. It would be accurate in terms of there is a Horizon
 18 integrity impact which needs to be checked out before
 19 going forward. I would say that's reasonable, yes.

20 Q. So if the ammunition was an arrow, it would fly true and
 21 straight, wouldn't it?

22 A. If it was relevant to the branch, yes. I think if
 23 a branch had a discrepancy, they would be entitled to
 24 assume that before any type of prosecution, or anything
 25 like that, that it was checked that there were no error

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1 impacts on their accounts, yes.

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

3 namely, a discrepancy is being caused by the Horizon

4 System, not by the subpostmaster?

5 A. Yes.

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

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

8 it?

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

10 the receipts and payments mismatch could produce gains

11 or losses but --

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

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

14 was truly owing?

15 A. Yes.

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

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

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

19 fact faulty".

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

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

22 affected branches", the document reads:

23 "There are three potential solutions to apply to

24 the impacted branches. The group's recommendation is

25 that solution 2 should be progressed."

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

2 whenever Fujitsu changed branch data, the branch should

3 be informed?

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

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

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

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

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

9 here, then yes, very much so.

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

11 document here?

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

13 Q. Can you remember who made the suggestion?

14 A. No.

15 Q. Can you remember who rejected it?

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

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

18 of that meeting but the type of thinking that NBSC

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

20 tended to think in the same way as me.

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

22 the page. It's decided:

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

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

25 and then it's missing.

91

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

2 to solution 2. So solution 1:

3 "Alter the Horizon branch figure at the counter to

4 show the discrepancy. Fujitsu would have to manually

5 write an entry value to the local branch account.

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

7 trading period, they would have a discrepancy, which

8 they would have to bring to account.

9 "Risk -- this has significant data integrity

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

11 the branch system and could generate questions around

12 how the discrepancy was caused. The solution could have

13 moral implications of Post Office changing branch data

14 without informing the branch."

15 So summing up solution 1 is: the branch never

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

17 right?

18 A. That's fair, yes.

19 Q. What were the moral implications?

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

21 Q. Can you try and help us?

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

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

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

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

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

2 loss.

3 "Risk -- huge moral implications to the integrity

4 of the business, as there are agents that were

5 potentially due a cash gain on their system."

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

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

8 raising, isn't it?

9 A. That's right, yes.

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

11 it?

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

13 we're never seriously going to do it.

14 Q. Who made the suggestion?

15 A. I don't know.

16 Q. Who rejected it?

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

18 imagine.

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

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

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

22 a suggestion.

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

24 they?

25 A. Yes.

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

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

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

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

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

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

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

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

100

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

1 taken back in September/October 2010, we've seen the
 2 documents around that, may this suggest that the
 3 follow-up on the impact on branches was taken less
 4 seriously?
 5 **A.** I can't really say.
 6 **Q.** Did the Post Office take seriously the need to
 7 understand the full impact of this significant issue
 8 and, in particular, the impact on individual branches
 9 and subpostmasters and ensure that all affected branches
 10 were identified and there was a proper investigation?
 11 **A.** Yes, as far as I was aware.
 12 **Q.** Can we turn, please, to POL00098016. This continues the
 13 thread of discussion on the two outstanding queries on
 14 the receipts and payments mismatch bug and we're now
 15 ahead to April 2013. Can we go, please, to page 4 of
 16 the thread to begin it.
 17 At the foot of the page, please, you will see
 18 an email from David Wright, who was I think an IT
 19 service adviser in service management, and it's an email
 20 to Andy Dunks and Penny Thomas, Steve Bansal, Scott
 21 Somerside and to you?
 22 **A.** Yes.
 23 **Q.** It reads "Andy", and I don't think that's you, that's
 24 the Andy Dunks that that was addressed to; is that
 25 right?

103

1 Langfield), who can then get the Fujitsu Problem
 2 Management team to dig further."
 3 So this is correspondence under two years after
 4 the problem was discovered and there appears, would you
 5 agree, to have been some doubt as between Fujitsu and
 6 POL over which branches had been investigated as
 7 possibly impacted and which had not?
 8 **A.** Yes.
 9 **Q.** At the very least, no shared understanding of what had
 10 happened?
 11 **A.** Yes.
 12 **Q.** Who was responsible for investigating and understanding
 13 the extent of the problem and updating the branches
 14 affected?
 15 **A.** In terms of updating the branches, I would probably
 16 suggest that that was P&BA. In terms of investigating,
 17 I would imagine that would be the IT team.
 18 **Q.** But you have got in 2012 here Mr Jenkins saying that,
 19 according to the documents that he can access, there's
 20 a branch with a very large discrepancy -- two branches
 21 with a very large discrepancy and they don't seem to be
 22 included in the list. Would you regard that as
 23 problematic?
 24 **A.** Yes.
 25 **Q.** Given the seriousness with which the mismatch bug was
 102

1 **A.** I would think so, yes.
 2 **Q.** "Andrew Winn (Relationship Manager, Financial Service
 3 Centre) has requested Service Management assistance in
 4 reopening Fujitsu investigations for two outstanding
 5 enquiries he has been dealing with for our branches.
 6 "At our recent service review meeting held with
 7 Leighton Machin he suggested your names as the
 8 appropriate contacts. Gareth Jenkins has also been
 9 approached in the past.
 10 "I have attached some information previously
 11 sharing via email but if you need more detail to help
 12 you resolve these incidents, please approach Andy Winn
 13 direct."
 14 Then they give your details.
 15 Then if we go up the chain, please, to page 3
 16 we'll see that a chaser is sent on 22 February. Just
 17 scroll down, please. Keep going, please. Yes, that's
 18 it, 22 February:
 19 "Hi Leighton,
 20 "I've just picked up a reply from an enquiry
 21 I made to Andy Winn in our Finance Service Centre (he
 22 has been on leave) and disappointingly he has not heard
 23 anything from the contracts you suggested last month.
 24 "Can you escalate the enquiry on our behalf?"
 25 So that's essentially a chaser, would that be
 104

1 right, from somebody that worked to you, David Wright?
 2 **A.** I think I remember David vaguely, I think he might have
 3 been working in NBSC at that time but I'm not sure he
 4 wasn't in P&BA Or Finance Service Centre, as it was
 5 then.
 6 **Q.** You can see his signature block there and he appears to
 7 be based in Dearne House in Barnsley?
 8 **A.** Right, okay.
 9 **Q.** Does that mean he was working for you or not?
 10 **A.** No.
 11 **Q.** Anyway it's a chaser, and then if we go back to page 3,
 12 please, at the foot of the page, another chaser a month
 13 later on 5 March. It's not month later, it's the
 14 following month:
 15 "Hi Leighton
 16 "Were you able to escalate this on our behalf?"
 17 Then a reply from Fujitsu:
 18 "Apologies ... It seems it was not cascaded at the
 19 point of your last request (I will cascade it now!)
 20 "A response in one form or another will be
 21 provided by [close of play] Thursday."
 22 Then up to the bottom of page 2, please,
 23 Mr Wright:
 24 "Hi Leighton
 25 "Did a response get issued on Thursday? I have
 105

1 "I need to be clear that there is no unresolved
 2 problem in case either branch appears in the ongoing
 3 Horizon integrity review.
 4 "I know you have previously stated that a work
 5 plan was set up to do some further analysis on [one of
 6 the branches] but [the Post Office] requested this not
 7 to proceed but I need to understand why they disappeared
 8 from the resolved spreadsheet."
 9 So what you were doing, you were saying that
 10 there's an issue that's now two to three years old --
 11 **A.** Yes.
 12 **Q.** -- and there are two branches that are maybe affected in
 13 different ways but I want a resolution?
 14 **A.** Yes, I think from what I remember is that they were on
 15 an initial list, a kind of quite big list at the time,
 16 and Fujitsu said these have got an issue but they're not
 17 the same as the receipts and payments, so we need to
 18 separate them, if I remember correctly.
 19 **Q.** For one of them, you had made a deduction -- the Post
 20 Office had made a deduction from the SPM's remuneration?
 21 **A.** Yes. Well, that's what it reads there.
 22 **Q.** You say:
 23 "I need to be clear that there is no unresolved
 24 problem in case either branch appears in the ongoing
 25 Horizon integrity review."
 107

1 not received it -- did it just go to Andy?"
 2 Then up to the bottom of page 1, please, thank
 3 you. Steve Bansal to a collection of people including
 4 you:
 5 "... accept my apologies thought as I thought I'd
 6 sent this mail some weeks ago."
 7 He answers a query about Paystation transactions.
 8 Do you see that in his third paragraph?
 9 **A.** Yes.
 10 **Q.** "So to answer the question very Paystation
 11 transactions", which is something else, yes?
 12 **A.** Yes.
 13 **Q.** Then you reply that top of the page, if we go to the top
 14 of the page. On 16 April 2013, you say:
 15 "Hi Steve
 16 Yes it does ...
 17 "However I'm far more concerned about the
 18 outstanding enquiry relating to the receipts & payments
 19 problem back in 2010 where we have two branches[and you
 20 identify them] who appeared [to be] on the initial list
 21 of branches but not on the list of those resolved. We
 22 still have a large unexplained credit on one branch
 23 whilst we have recovered money from pay on the other
 24 despite them recording a significant surplus at the
 25 time.
 106

1 Why would you need to be clear that there's no
 2 unresolved problem for that purpose, rather than because
 3 in one case the subpostmaster might owe money and in the
 4 other case the subpostmaster is owed money.
 5 **A.** There would be no difference between the two. The issue
 6 needs to be resolved.
 7 **Q.** But why was it important in case either branch appears
 8 in the ongoing integrity review? Wouldn't it be a good
 9 enough reason that we've taken some money out of
 10 a subpostmaster's wages, perhaps wrongfully, that I need
 11 an answer?
 12 **A.** I would say any branch that we know has got a problem we
 13 need to resolve it as quickly as possible.
 14 **Q.** But we're two or three years on now?
 15 **A.** Yes.
 16 **Q.** Was it because the decks needed to be cleared because
 17 you didn't want cases like this showing up in the
 18 integrity review, as you call it?
 19 **A.** I don't think it was anything to do with debts, I think
 20 it was to do with branches like that shouldn't have
 21 issues that need resolving three weeks old, never mind
 22 three years.
 23 **Q.** So the bug was a significant issue for the Post Office?
 24 **A.** Yes.
 25 **Q.** It was covered in 2010 at some point. Was it causing
 108

1 you some considerable concern, even aside from the
 2 integrity review, that by 2013 you still didn't have
 3 a clear picture as to who was affected and how?
 4 **A.** No, because my belief was that if there was
 5 a discrepancy -- if the receipts and payments impacted
 6 a branch, then the balancing amount would land in our
 7 discrepancy account and we'd got the discrepancy account
 8 cleared down so that we could see any figure that was --
 9 because normally in a discrepancy account you would do
 10 your branch trading, money would go into the discrepancy
 11 account, the subpostmaster would pay it or we'd repay
 12 the postmaster, and that amount would clear down to
 13 zero. So basically the account, at that kind of time,
 14 in 2013, was very clean.
 15 So if any branch had a receipts and payments
 16 mismatch, we would see it eventually, not in
 17 a particularly timely manner, but we start seeing
 18 figures rolling forward.
 19 **Q.** Can I turn to a different issue. That document can come
 20 down, please.
 21 Can we look -- and this is to do with remote
 22 access -- at POL00023432. Can we look at the second
 23 page first, please. Just to explain, the reason I'm
 24 asking you these questions is because they concern your
 25 engagement with subpostmasters and your knowledge about
 109

1 "I have attached notes of the interview should you
 2 want to refer to them although they are rather long.
 3 There are two issues which the suspended subpostmaster,
 4 Graham Ward, raised ..."
 5 So just some context here, stopping at that point,
 6 Graham Ward was a subpostmaster at that branch, the
 7 Rivenhall branch, whose contract was terminated, we know
 8 whose appeal against contract termination was dismissed,
 9 who became one of the 555 Claimants in the Group
 10 Litigation and who is a Core Participant in this
 11 Inquiry. His evidence was read to the Chairman in the
 12 course of the Human Impact hearings last year.
 13 In short, he's a subpostmaster who lost his job,
 14 whose marriage broke down and who was left in debt with
 15 four young children.
 16 Now, Mr Lusher encloses the interview transcript
 17 and gives a summary. Let's read the summary together:
 18 "1. He claims that on a number of occasions
 19 figures have appeared in the cheques line of his
 20 account. He suspects these have been input into his
 21 account electronically without his knowledge or consent.
 22 He is certain that he has cleared and remmed out cheques
 23 in the correct way and tells me that cheques must be
 24 properly cleared on the system to progress to a new
 25 account."
 111

1 remote access. So the chain starts, and it's only a two
 2 email chain, from Mr Lusher -- can you see that at the
 3 foot of the page -- who is a contracts adviser in the
 4 network support team in Norwich.
 5 **A.** Yes.
 6 **Q.** Just explain shortly what that role involved.
 7 **A.** They are responsible for making sure that the contracts
 8 were applied to subpostmasters and for -- by the
 9 subpostmasters. They would be, if I remember right,
 10 responsible for signing off any debt recoveries, major
 11 debt recoveries. I never really saw a job description.
 12 But contracts managers, we were regularly -- they would
 13 be involved in becoming aware of debt and so there would
 14 be quite a lot of conversation, communication between
 15 contract managers and myself, some more than others.
 16 **Q.** If we go to the top of the page, we can see it's
 17 an email from Mr Lusher to you of 15 October 2008, and
 18 he says:
 19 "Hi Andrew
 20 "I spoke to you a few days ago about a suspension
 21 at Rivenhall. From our conversation, I believe that you
 22 had a good understanding of the problem and I would be
 23 grateful for further guidance. Rivenhall is a one
 24 position rural branch -- the only abnormal product being
 25 an ATM.
 110

1 Just stopping there, can you explain what you
 2 understand from what is being described there from
 3 Mr Ward's account?
 4 **A.** What he's saying is that he's seeing cheques appear on
 5 his cheque line that he doesn't believe he has taken and
 6 input to the Horizon System.
 7 **Q.** What does he seeing checks appearing on his cheque line
 8 mean?
 9 **A.** You can pull up a cheque holdings at any point which
 10 will show the values that have been input there and that
 11 will be what he's seeing.
 12 **Q.** He is saying that he has cleared and remmed the cheques.
 13 What does he mean by that?
 14 **A.** So at end of day you would -- well, not necessarily at
 15 the end of the day, when the postman arrives for, say,
 16 4.00, just before then you will look to see what cheques
 17 you've got, check them against your cheque line, make
 18 any adjustments if need be because people will make
 19 mistakes of pressing cash, like they do every time. So
 20 you need to introduce a cheque there. Rem out the
 21 cheques. I can't remember the order of it but basically
 22 you rem out the cheques which means you're dispatching
 23 them --
 24 **Q.** You handed the cheque over?
 25 **A.** That's what you're telling the system. That wouldn't --
 112

1 you'd do that at the same time but not precisely the
 2 same time and you would need to clear the cheque line,
 3 cheque account.
 4 Q. Ie I've received a cheque from somebody I've now passed
 5 the cheque on?
 6 A. That's right.
 7 Q. In physically pass the cheque on?
 8 A. Yes, that's what he's telling Horizon. There is a bit
 9 and I'm afraid I can't describe it properly but there is
 10 two elements to the process. One is the remming out of
 11 the cheques and the other one is to clear the cheque
 12 line. It sounds -- now it sounds -- there was some
 13 logic to it but, at the moment, I can't explain why rem
 14 out isn't there. But it did cause problems in terms of
 15 if you get distracted and you forget you are doing it
 16 and that can result in cheques appearing when you don't
 17 expect them to be.
 18 Q. What he is saying is that he's certain he has cleared
 19 and remmed out the cheques and yet there are some
 20 cheques appearing on his cheque line which suggests that
 21 he is still sitting on cheques?
 22 A. Yes.
 23 Q. He paragraph 2:
 24 "He has made good about £10,000 and not made good
 25 about £11,000 of the shortages which arise from these
 113

1 £200 example.
 2 A. Yes.
 3 Q. You would agree, I think, that this is a very serious
 4 issue being raised?
 5 A. Yes, if it's backed up, yes.
 6 Q. It's serious for the subpostmaster, would you agree,
 7 because on his account he's lost £10,000 of his own
 8 money, yes?
 9 A. Yes. Oh, yes.
 10 Q. The system is showing that he owes a further £11,000.
 11 It's serious for that reason, would you agree?
 12 A. Yes.
 13 Q. It's serious for him because he's been suspended?
 14 A. Yes.
 15 Q. And it's serious for him because his contract might be
 16 terminated and he would lose his job and his livelihood?
 17 A. Yes.
 18 Q. It's serious, would you agree, for the Post Office
 19 because if a subpostmaster's saying that the system
 20 that's used across the country has introduced a phantom
 21 sum into his cheque line of account, that's very
 22 serious?
 23 A. Yes.
 24 Q. If it's correct, it's a serious issue with the Horizon
 25 System?
 115

1 figures. He claims that because of the abnormal nature
 2 of these entries, the shortages have not just rolled
 3 over from one branch trading statement to the next, but
 4 have accumulated -- each being added to the last (eg if
 5 the account in period one showed a shortage of £100
 6 which was not made good, then the shortage shown in
 7 period 2 would be £200)."
 8 Then just scroll down a little bit:
 9 "The subpostmaster's contract remain suspended.
 10 I would be very grateful for your expert comment and
 11 advice."
 12 You would agree that the account summarised by
 13 Mr Lusher of what Mr Ward was saying was a clear and
 14 coherent one?
 15 A. It appears it, yes.
 16 Q. He's saying he has put £10,000 of his own money in
 17 already but he's not made good another £11,000 of
 18 loss --
 19 A. Yes.
 20 Q. -- and he's saying that the system's magnifying the
 21 loss, even without him doing anything by simply moving
 22 from one trading period to the next.
 23 A. Well, more than that. It's doubling up every trading
 24 period.
 25 Q. Yes it's magnifying, doubling up. He uses the £100 to
 114

1 A. Yes.
 2 Q. Can we turn to your response, please, page 1. You
 3 respond on 23 October, so his email was the 15th, this
 4 is 23 October 2008, and you say:
 5 "1. The only way POL can impact branch accounts
 6 remotely is via the transaction correction process."
 7 Reading a couple of sentences on -- sorry I will
 8 read the next sentence:
 9 "These have to be seared by the branch in the same
 10 way that in/out remittances are I guess. If we were
 11 able to do this, the integrity of the system would be
 12 flawed. Fujitsu have the ability to impact branch
 13 records via the message store but have extremely
 14 rigorous procedures in place to prevent adjustments
 15 being made without prior authorisation -- within POL and
 16 Fujitsu."
 17 Now, in your witness statement, you say that you
 18 were aware that Fujitsu had what you describe as remote
 19 access and this is an email suggesting you knew at least
 20 by 2008, yes?
 21 A. Yes.
 22 Q. And --
 23 A. I would say that my response there was a repetition of
 24 a -- I would imagine from this point I went to someone
 25 in Fujitsu or our IT side, asked them that question that
 116

1 Alan had posed and repeated it back there. I don't
 2 think that kind of would have come just from me.
 3 Q. Well, I was going to suggest this first part of
 4 paragraph 1 suggests some familiarity by you with
 5 Fujitsu's access controls, doesn't it?
 6 A. As a result of me -- Alan posed the question "Can we
 7 get -- can there be remote access" and I will have asked
 8 the question based on that question.
 9 Q. How had you satisfied yourself as to the security of the
 10 Fujitsu access controls?
 11 A. I don't think I did.
 12 Q. How could you be satisfied that they were being
 13 monitored effectively by Fujitsu?
 14 A. I couldn't.
 15 Q. We know from some evidence that a man called Richard
 16 Roll gave in the Group Litigation and indeed from
 17 documents disclosed by Fujitsu to us in this Inquiry,
 18 that Fujitsu's third line of support were routinely
 19 using their ability to go into the system in a way that
 20 was described by them as "off piste". Did you know
 21 about that?
 22 A. No.
 23 Q. That wasn't in accordance with the regularisation
 24 controls and protocols that were in place?
 25 A. Yes, I wasn't aware of that.

117

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

119

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

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

120

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

121

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

123

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

122

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

124

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

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

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

13 A. Isn't it?

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

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

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

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

3 A. No, no.

4 Q. But it's accurate.

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

6 Q. You assume that --

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

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

11 A. I believed he was --

12 Q. -- unless he prove otherwise?

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

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

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

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

22 A. Probably. It wasn't --

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

25 A. Yes, fair point.

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

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

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

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

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

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

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

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

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1 Q. What is the answer to it?

2 A. I don't know.

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

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

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

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

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

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

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

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

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1 "We've had a media inquiry from Retail Newsagent
 2 magazine; they have been talking to a subpostmaster who
 3 has said that his branch was closed in [September] 2008
 4 because of financial irregularities which he claims are
 5 the fault or Horizon.

6 "I am providing our stock line which states the
 7 system is robust but in case we get more questions on
 8 this please can you advise if you have any record of
 9 an investigation for this individual and any relevant
 10 details -- Graham Ward, Rivenhall Oak Stores & Post
 11 Office in Witham."

12 Can we go back over the page to page 1, please --
 13 the bottom half of the page, please. Michele Graves,
 14 the Executive Correspondence Manager for the Executive
 15 Correspondence Team, replies:

16 "I have been corresponding with Mr Ward for
 17 a while. You may recall he is on the spreadsheet
 18 I pulled together. I'll send over what I have. The
 19 issue is basically the same -- Horizon is at fault --
 20 and he has focused on some cheques despatched from his
 21 branch that [I think that's] then showed up on his
 22 cheque line. The termination went to appeal and the
 23 decision to terminate was upheld. Mr Ward's MP is
 24 Brooks Newmark who I believe has raised Parliamentary
 25 questions re Horizon integrity.

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

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1 A. I can't say.
 2 **MR BEER:** Yes, thank you very much, Mr Winn. Those are the
 3 only questions I ask at the moment.
 4 I wonder whether we might take a 15-minute break
 5 and then the questions for the Core Participants can
 6 commence at 3 pm?
 7 **SIR WYN WILLIAMS:** Yes, that's fine.
 8 **MR BEER:** Thank you very much, sir.
 9 **(2.47 pm)**
 10 **(A short break)**
 11 **(3.00 pm)**
 12 **MR BEER:** Sir, thank you. I think Mr Stein is going to ask
 13 questions first.
 14 **Questioned by MR STEIN**
 15 **MR STEIN:** Good afternoon, Mr Winn, my name is Sam Stein.
 16 I represent a large number of subpostmasters and
 17 mistresses.
 18 I am going to take you back, first of all, to the
 19 mismatch document, which I hope I've got the correct
 20 reference number to, which is POL00028838.
 21 Can we go to page 3, please. Mr Winn, you were
 22 taken to this document earlier on by Mr Beer who
 23 highlighted with you the various solutions that were
 24 discussed on this page. Frankie, can you highlight
 25 Solution One, please, in yellow -- thank you.

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1 the branch.
 2 Was this the first time that you'd learnt that
 3 Fujitsu could alter branch accounts?
 4 **A.** I don't know.
 5 **Q.** Well, it's a fairly significant issue to have come up in
 6 this particular meeting, bearing in mind you are dealing
 7 with Rivenhall; do you agree?
 8 **A.** Yes.
 9 **Q.** As an example did you say to yourself that we'd better
 10 do something about Rivenhall because this appears to be
 11 show that Mr Ward there may be right, that data there
 12 could be interfered with without his knowledge?
 13 **A.** I think there's a difference between entering data to
 14 resolve a problem rather than what implication was for
 15 Mr Ward of somebody introducing cheques for no apparent
 16 reason.
 17 **Q.** I see. Did you, in any way, investigate the issue that
 18 comes from this when you thought about Mr Ward's
 19 situation?
 20 **A.** No.
 21 **Q.** You understand the link, don't you?
 22 **A.** I do now, yes. I probably wouldn't have at that point.
 23 **Q.** I will take you to another document, please, which is
 24 POL00055410. Thank you. Further down the page please,
 25 Frankie, and this is a document you were shown just

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1 Now, let's just remind ourselves of what Solution
 2 One referred to, Mr Winn. Solution one was:
 3 "Alter the Horizon Branch figure at the counter to
 4 show the discrepancy. Fujitsu would have to manually
 5 write an entry value to the local branch account."
 6 Then it says:
 7 "IMPACT -- when the branch comes to complete next
 8 Trading Period they would have a discrepancy, which they
 9 would have to bring to account."
 10 Now under "RISK":
 11 "This has significant data integrity concerns and
 12 could lead to questions of 'tampering' with the branch
 13 system and could generate questions around how the
 14 discrepancy was caused. This solution could have moral
 15 implications of Post Office changing branch data without
 16 informing the branch."
 17 Now, you've just been asked before the short
 18 break, a few minutes ago, a number of questions about
 19 Rivenhall Post Office and about questions that related
 20 to interference with the data that was being seen by the
 21 postmaster there, Mr Ward, yes? At this particular
 22 meeting you are being told it is possible to tamper with
 23 branch office accounts and, indeed, the conclusion is,
 24 as regards that, that that could have moral implications
 25 of Post Office changing branch data without informing

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1 after the luncheon adjournment today, the one that is
 2 dated 8 October 2010 and Mr Beer took you to this and
 3 dealt with particular points.
 4 Can I take you to the second paragraph. So this
 5 is about the mismatch meeting notes:
 6 "The above includes Fujitsu's initial analysis and
 7 proposed solution/s."
 8 Can we scroll up to the above bit please, Frankie.
 9 So the attachments in relation to this email are
 10 the "ReceiptsPayments notes[version]5", which we believe
 11 are the mismatch notes that you have been asked a number
 12 of questions about and then, after the colon,
 13 highlighted there, "Lost Discrepancies", that's
 14 a document drafted by Mr Jenkins, okay.
 15 Let's go back to what we're seeing in the middle
 16 of this email. You said in your evidence today to the
 17 Chair of this Inquiry that you thought that Fujitsu had
 18 proposed the three solutions in the mismatch meeting
 19 notes?
 20 **A.** Yes.
 21 **Q.** Now, this particular email from Alan Simpson who
 22 attended that meeting is saying the above -- the above
 23 attachments -- includes Fujitsu's initial analysis and
 24 proposed solutions. Does that help you in your
 25 recollection that it was Fujitsu that had put forward

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1 the solutions that you have been taken to today?
 2 **A.** It supports what we were saying, yes.
 3 **Q.** Now, as regards those solutions, did anybody consider at
 4 the meetings in relation to the mismatch bug and
 5 software error, did anybody consider the legal
 6 implications of keeping information back from
 7 subpostmasters being prosecuted?
 8 **A.** I can't remember that being discussed, no.
 9 **Q.** As an example, did anybody suggest that might be
 10 a criminal offence of keeping that information back?
 11 **A.** No.
 12 **Q.** No?
 13 **A.** No.
 14 **Q.** Lastly in relation to this, the email is referring to:
 15 "The above includes Fujitsu's initial analysis and
 16 proposed solution/s, whilst the other documents the
 17 outputs from various meetings held this week."
 18 Let's take that apart into two bits. So it looks
 19 as though, regarding the mismatch discussions, that
 20 there were various meetings. Is that your recollection?
 21 **A.** I don't remember attending various meetings -- it may
 22 have been phone conferences rather than meetings.
 23 **Q.** Would it be normal for these meetings to have notes
 24 taken?
 25 **A.** Well, somebody would have been responsible, yes,

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1 there has been no re-occurrence to the phantom
 2 transactions but there still may be problems."
 3 Let's unpick what this all means. Romec the Royal
 4 Mail or Post Office engineers; is that correct?
 5 **A.** Yes.
 6 **Q.** This is referring to phantom transactions coming up on
 7 the screen; do you agree?
 8 **A.** Yes.
 9 **Q.** Phantom transactions in relation to the date of this
 10 particular entry seems to have gone back to quite early
 11 days of Legacy Horizon; do you agree?
 12 **A.** Yes.
 13 **Q.** Were you aware of phantom transactions as being
 14 a problem?
 15 **A.** No.
 16 **Q.** Do you remember speaking to Colleen Ingham, we think, in
 17 about 2004 about phantom or ghost transactions?
 18 **A.** No, sorry, no.
 19 **Q.** So help us a little bit further in relation to this.
 20 Bearing in mind that we're talking about phantom or
 21 ghost transactions appearing on a subpostmaster's
 22 screen, was this some information that would have been
 23 useful for your consideration in handling postmaster
 24 issues?
 25 **A.** Yes, I think it would be fair to say that when I left

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1 I believe so, yes.
 2 **Q.** Presumably, the end result of such meetings would be
 3 notes and minutes?
 4 **A.** Yes.
 5 **Q.** I am going to take you, please, to then a different
 6 document, which is POL00029224, page 5.
 7 If you can scroll down the page. This document,
 8 I am afraid, is difficult. We might be able to improve
 9 it by expanding it slightly, Frankie. Go further down
 10 the page, please, and again a little bit further down
 11 again. You will see at the bottom of that page, if we
 12 can highlight from "Information: Ki Barnes has called
 13 in", can we zero on that and expand and highlight.
 14 Now, this particular document, as you can see,
 15 it's 2001, it looks like, and the reference is to
 16 phantom transactions, okay?
 17 **A.** Mm-hm.
 18 **Q.** So I'll read what we have here. This is a record of
 19 this matter being dealt with as a PEAK, which is part of
 20 the system being used by Fujitsu:
 21 "I am unsure as to what to do with this call now.
 22 Romec have been to site and state that they have
 23 actually seen the phantom transactions, so it is not
 24 just the PM's word now. They have fitted suppressors to
 25 the kit but the PM is still having problems. As yet

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1 the business I didn't accept the concept of phantom
 2 transactions and that was in 2016.
 3 **Q.** Right. Now, in your evidence earlier on, when you were
 4 discussing matters with Mr Beer, you appeared to be
 5 familiar with the concept of phantom transactions being
 6 raised. You weren't saying to him "I don't know what
 7 you're talking about, Mr Beer". So when did you start
 8 to become aware of the topic of phantom transactions?
 9 **A.** I would have said it would be when Second Sight started
 10 their investigation but that kind of feels a bit too
 11 late, to be honest. So I probably heard the term before
 12 but I struggled with the concept of it.
 13 **Q.** Ms Ingham, who ran the Cockfield Post Office in County
 14 Durham recalls you speaking to her about ghost
 15 transactions in around 2004?
 16 **A.** 2004, okay.
 17 **Q.** Thinking back, do you think that's possible?
 18 **A.** I'm trying to think what role I'd be in in 2004.
 19 I guess that was in problem management, was it?
 20 **Q.** Very early days of that, we think.
 21 **A.** No, I don't know if I was in problem management then or
 22 in the Transaction Improvement Team, Network Improvement
 23 Team.
 24 **SIR WYN WILLIAMS:** If it helps, I think early on in your
 25 evidence you were referred to paragraph 1 of your

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1 witness statement where you suggested that you'd gone to
2 the problem management team in 2005 but, in fact, there
3 was a document which showed that you were there in 2003.

4 **A.** Okay.

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

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

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

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

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

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

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

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

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

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

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

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

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

24 **A.** Okay.

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

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1 "Thanks, Rod."

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

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

7 "Rod

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

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

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

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

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

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1 grateful.

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

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

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

8 "Andy

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

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

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

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

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

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

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

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

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1 particular email and then the starting point for the
 2 reference that I'm about to make is "If there is
 3 anything specific to investigate". Thank you.
 4 So the email is saying:
 5 "We are aware of the problems at the branch. The
 6 letter suggests she has done all the checks we (and
 7 NBSC) would have suggested. There is not a lot of value
 8 I can add as there is nothing recorded that would
 9 account for the different losses.
 10 "There are no transaction corrections that account
 11 for the losses or that should have compensated for them.
 12 She has already checked her transactional records and
 13 can see nothing so it is unlikely that customers are
 14 suddenly going to start alerting us to strange deposits
 15 into their accounts.
 16 "What may or may not be interesting is a [£1,000
 17 transaction correction] issued recently for a cash
 18 shortage in a rem to the cash centre. One would have
 19 thought that with the issues involved that a mistake
 20 like this would not have been made that realising. It
 21 is possible they did realise once the rem had gone but
 22 smacks of carelessness at least."
 23 Now, that level of judgement in relation to
 24 an investigation as regards this branch, which is
 25 suggesting that it's careless, is that in the same line
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1 investigation.
 2 Q. Then, lastly for my part, and I take you to another
 3 document POL00090726. Page 15 of this document first.
 4 Go a little bit further down the page so we can see the
 5 letter at the bottom, please.
 6 So we can see, Mr Winn, there's a letter from you
 7 to Mr Afzal?
 8 A. Yes.
 9 Q. So we're going back to the start of this letter and the
 10 date of it, please, if we just show that: 11 October
 11 2011.
 12 "Dear Mr Afzal
 13 "Re Branch Discrepancy
 14 "I'm sorry to learn that your branch has
 15 experienced connectivity problems in September. I'm
 16 afraid I don't think I am going to be able to help you."
 17 You go on to say this:
 18 "Some transactions will never be recoverable,
 19 eg stamp sales whilst others, eg card account
 20 withdrawals will be recoverable dependent upon the point
 21 at which the communications broke down. I appreciate it
 22 is difficult to know where you are if communications are
 23 lost."
 24 So Mr Winn, can we establish that in at least
 25 11 October 2011 your knowledge about connectivity
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1 as your views earlier, that this is a general view of
 2 the Post Office, that it's likely to be down to
 3 subpostmaster fault where there are issues?
 4 A. I don't think it particularly states that.
 5 Q. Then it goes on to say this:
 6 "If there is anything specific to investigate I am
 7 happy to. It may be worth getting something in writing
 8 from Fujitsu to confirm there is nothing that could have
 9 failed to have polled/software anomalies that will come
 10 back to bite us."
 11 Signed "Andy".
 12 Is that the right approach, Mr Winn?
 13 A. It feels sensible.
 14 Q. Does it?
 15 A. To me, yes.
 16 Q. What about a deeper investigation as to polling issues?
 17 A. Well, that would be Fujitsu who would do that.
 18 Q. Given at this stage, this is after the other issues that
 19 you had been made aware of, after the mismatch bug, such
 20 discussions in relation to that, you didn't think at
 21 this stage that the best thing to do would be to, in
 22 fact, properly investigate this?
 23 A. I thought it was -- obviously thought it was worth going
 24 back to Fujitsu to get a report on the polling issues
 25 but apart from that I couldn't see any other route for
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1 problems was that it could lose data?
 2 A. Yes.
 3 Q. Keep reading:
 4 "However there is a general principle that if
 5 a transaction receipt has not been produced by Horizon,
 6 the transaction has not completed and cash should not
 7 change hands until you are certain of the transaction
 8 status. Clearly if recovery takes a period of time, the
 9 customer may have left. If the transaction is seen to
 10 be recoverable, the option not to proceed with recovery
 11 should be chosen."
 12 Then you go on to say this:
 13 "Unfortunately I am not able to offer any relief
 14 to branches who may not have followed recovery
 15 procedures in full."
 16 So this is clearly a discussion about connectivity
 17 issues that may have caused a branch transaction
 18 difficulty; do you agree?
 19 A. Yes.
 20 Q. Why here are you saying that you are not able to help:
 21 "I'm sorry to learn your branch has experienced
 22 connectivity problems in September. I'm afraid I don't
 23 think I'm going to be able to help you."
 24 Why is that the attitude of the Post Office?
 25 A. I think there was a recovery process to follow. Quite
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1 why the -- if it wasn't followed properly, it could
 2 cause issues. That must have been a business decision
 3 that we're unable to resolve. I can't really remember
 4 it well enough, I'm afraid.
 5 Q. Let's be as generous as we can to the Post Office at
 6 this juncture. We've got connectivity issues being
 7 caused by the system that the Post Office branches have
 8 to use, okay. That's at least a large part of this
 9 problem. Why isn't the Post Office saying "Sorry to
 10 hear about that problem, obviously this at the very
 11 least is partly our fault, we will help come sort it out
 12 and repay your losses". Why isn't that happening?
 13 A. That sounds reasonable.
 14 Q. It does. Why wasn't it happening, Mr Winn?
 15 A. I can't say.
 16 Q. Can we go then to the page 14, please. Society
 17 14 October 2011 to Mr Afzal, Ferry Road Post Office.
 18 "Dear Mr Afzal.
 19 "Re Branch Discrepancy
 20 "I'm sorry doubt I don't think I can assist you
 21 any further. The process for disputing losses is via
 22 the helpline. As far as I can see there is no evidence
 23 of Horizon failure been presented which would generate
 24 an investigation."
 25 Then:

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1 manage any losses of connectivity. This does not
 2 represent Horizon failure and the business has been very
 3 clear that it will not compensate losses due to
 4 connectivity break down."
 5 Let's take that apart. What are the processes
 6 that were in place for branches to manage any losses of
 7 connectivity this way?
 8 A. I can't remember but they would be -- on the Horizon
 9 Help you would be able to put -- but once you got
 10 connectivity back, you could refer to them if you hadn't
 11 already got the knowledge of what to do.
 12 Q. Those processes clearly don't involve compensation, do
 13 they?
 14 A. No.
 15 Q. Because you clear that one up:
 16 "This does not represent Horizon failure and the
 17 business has been very clear that it will not compensate
 18 losses due to connectivity breakdown."
 19 Let's just understand what you mean by this. Why
 20 would the Post Office not compensate subpostmasters for
 21 issues caused by connection problems of the Horizon
 22 equipment?
 23 A. I cannot recall the process and how it was managed. I'm
 24 sorry.
 25 Q. As an example, was this directive from the Post Office?

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1 "There are processes in place for branches to
 2 manage any losses of connectivity. This does not
 3 represent Horizon failure and the business has been very
 4 clear that it will not compensate losses [due] to
 5 connectivity breakdown.
 6 "As such I cannot suggest who in Post Office
 7 Limited might take a different view and be able to help
 8 you."
 9 Then if we scroll down to the bottom, we will see
 10 it's signing my you:
 11 "Yours sincerely
 12 "Andrew Winn."
 13 So let's have a look at what you said then to
 14 Mr Afzal:
 15 "I'm sorry but I don't think I can assist you any
 16 further. The process for disputing losses is via the
 17 helpline."
 18 Which helpline did you mean?
 19 A. NBSC.
 20 Q. NBSC. So via the Post Office helpline, that's the only
 21 way that Mr Afzal should be able to dispute these
 22 matters?
 23 A. That was the designated route for IT problems, yes.
 24 Q. Then it goes on to say -- or you go on to say:
 25 "There are processes in place for branches to

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1 A. From the wording in my letter I've obviously been up and
 2 checked the business position at the time and reiterated
 3 what I've been told.
 4 Q. Is this you -- you were talking earlier about you
 5 settling into your job and getting better at it after
 6 a few years. Is this you having settled into the job
 7 and having got better at it after a few years, Mr Winn?
 8 A. That was the business rules which I'm following.
 9 Q. Which you are enforcing.
 10 A. Yes, I'm sorry the business rules weren't correct but --
 11 Q. Why do connection issues not represent Horizon failure?
 12 A. I would regard loss of connectivity as being like losing
 13 Wifi connection, the equivalent, as I understand
 14 nowadays. So I wouldn't understand it as Horizon being
 15 at fault. I'd understand it as the first links which
 16 you know, a lot of rural branches did suffer from
 17 connectivity issues. I mean, my interpretation was that
 18 that was not Horizon at fault but it might --
 19 Q. So it is just hard luck on subpostmasters; is that
 20 right, Mr Winn?
 21 A. Well, there's a process -- there was a process to follow
 22 to recover the transactions.
 23 Q. But to make sure that you are finished with the problem,
 24 you finish off by saying:
 25 "As such I cannot suggest who in Post Office might

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1 take a different view and be able to help you."
 2 So you're saying "That's it"?

3 **A.** That would imply that I checked with the people who
 4 I think might have a different view and already got
 5 their opinion.

6 **Q.** Excuse me one moment.
 7 Thank you, Mr Winn.
 8 Thank you, sir.

9 **SIR WYN WILLIAMS:** Thank you, Mr Stein.
 10 Anyone else?

11 **Questioned by MS PAGE**

12 **MS PAGE:** Yes, please, sir.
 13 If I can take us to a document which helps
 14 a little bit on the subject of phantom transactions.
 15 It's POL00093133. This is an email chain, which you're
 16 not actually copied in on but which makes a reference
 17 to you, which may assist. Could we start at the bottom,
 18 please, the last page in this so that we read up
 19 chronologically.
 20 Do you know either of these names Bethany or Sally
 21 Buchanan? They seem to be from Customer Service, if
 22 that means anything?

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

24 **Q.** What we've got here is Bethany saying:
 25 "Are you able to help me with this office or let
 153

1 and one or more customers have been given money they
 2 were not entitled to and have just kept it."
 3 So that is the start and if we go up then to
 4 response, there's a blank page so we need to go a little
 5 buyer thank you, and we can see that this is 27 June
 6 2003 from Terry Rudd in customer relations:
 7 "Thanks for raising this matter with us. An
 8 investigation has taken place with Julie Welsh, our
 9 contact at Fujitsu, and she accepts that the PM did call
 10 the Helpdesk to state that transactions were appearing
 11 on the sales stack, but kit was swapped out and the
 12 problem did not reoccur. As no further problems were
 13 reported, she thought that was the end of the matter.
 14 "As the losses occurred back in January,
 15 information relating to this branch has now been
 16 archived but your concerns have today been raised with
 17 the Problem Management Team who have more experience in
 18 dealing with phantom transactions. I am unsure which
 19 member of the team will be assigned to the case, but if
 20 you have any further questions, the Line Manager for the
 21 team is Andy Winn."
 22 Then it sets out a reference code for queries
 23 regarding this issue and signs off:
 24 "... Customer Relations [can't help] but I am sure
 25 Andy and his team will do their best to resolve this."
 155

1 me know who can help.
 2 "The office had a major software problem back in
 3 week 41 (January 2003). After numerous phone calls to
 4 NBSC and engineer visits to change cables, monitor
 5 et cetera, a software problem was identified and the
 6 processor changed. Apparently the screen would take on
 7 a mind of its own, jump screens, add items to the sales
 8 stack, et cetera. The office balanced £422.74 short
 9 that week, which is very unusual for the office -- they
 10 are normally within £20 each week.
 11 "The subpostmistress has waited for an error
 12 notice to come back, nothing has been received yet and
 13 I've checked with Chesterfield several times -- nothing
 14 so far. I have also checked the paperwork in the office
 15 for week 41, along with week 40 and week 42 and I can't
 16 find anything. Is there anything you can do at Dearne
 17 Valley ..."
 18 Is that the place where your premises were when
 19 you were in problem management?

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

21 **Q.** "... to have that week's work checked on the system to
 22 see if this has been caused by a systems fault. The
 23 only other thing I can think of is that if the system
 24 was going daft and putting things onto the sales stack,
 25 this wasn't picked up every time by the person serving
 154

1 So what we have there is an indication that
 2 phantom transactions were something sufficiently well
 3 known in your team that this was being specifically
 4 referred to you and your team?

5 **A.** Yes.

6 **Q.** Yes?

7 **A.** Yes.

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

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

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

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

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

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

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

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

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

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

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

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

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1 process in January --

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

3 document.

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

5 **A.** It sounds sensible.

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

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

8 asked our client subpostmasters who had experience of

9 running post offices before January 2009, when we asked

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

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

12 she was not aware that there was any dispute resolution

13 process whatsoever. Is it right that, prior to

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

15 process at all?

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

17 be correct, yes.

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

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

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

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

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

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

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

25 of evolved from there.

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

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

3 for you?

4 **A.** Yes.

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

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

7 topical when I first joined the team.

8 **Q.** Right.

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

10 think I was involved in any of the decisions around

11 suspension or anything.

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

13 known?

14 **A.** Yes.

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

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

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

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

19 which you might imagine bankrupted Mr Castleton. He

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

21 living, his family were treated like thieves and they

22 endured years of hardship.

23 What we now know from documents in this Inquiry,

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

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

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

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

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

4 it?

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

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

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

8 it was.

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

10 management or had you entered the realms of senior

11 management by this stage?

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

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

14 disputes?

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

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

17 suited to working within the whole Royal Mail Group.

18 **Q.** Why?

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

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

21 with the subpostmasters, I think.

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

23 your correspondence?

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

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

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

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

3 with legal advice, to pursue the claim:

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

5 defend the Horizon System and hopefully send a clear

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

7 and to deter others from raising similar allegations."

8 So that was the purpose. It was not ever

9 envisaged that the Post Office would actually get that

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

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

12 message to deter others.

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

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

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

16 like, to try to deter others?

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

18 probably the most high profile case at that time but

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

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

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

22 including one which --

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

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

25 case at all, Mr Winn?

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1 A. No, I don't.

2 **SIR WYN WILLIAMS:** I mean, I'm conscious that this is a very

3 sensitive case, Ms Page, but don't think it's

4 appropriate to use the witness just for you to read

5 extracts of other documents.

6 **MS PAGE:** I was just to about to come to the documents which

7 he is involved with, sir. So I hope that's.

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

9 **MS PAGE:** That was a scene setting, if you like.

10 The related case, if you like, which you were

11 involved with was a Mr Bilkhu. Does that ring any

12 bells?

13 A. No.

14 Q. So Mr Bilkhu issued a claim against POL but then

15 withdrew it because he was threatened with costs of

16 instructing an expert in the region of £1 million and he

17 told you about that. Do you remember?

18 A. No.

19 Q. Well we can perhaps then have a look at POL00001304 at

20 page 29, bottom of the page. This is from him to you.

21 We can perhaps go to the top of the page, just so that

22 you can see that. He was writing from Bowburn Post

23 Office and you can see there at the top, "Dear Mr Wynn",

24 he has obviously misspelt your name but the

25 correspondence shows that he had written to you and this

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1 the case can we resumed subject to legal niceties.

2 "In summary, the case was withdrawn [he is talking

3 about his case] because POL's legal team demanded that

4 Horizon accounts at Bowburn [Post Office] for the last

5 4 years be examined by a forensic accountant. The cost

6 (estimated at £1 million) be borne by me."

7 Reading that letter, does that not ring any bells?

8 A. No.

9 Q. The idea that the legal department would threaten

10 somebody with costs estimated at £1 million?

11 A. No.

12 Q. Looking back, do you think this is part of a culture of

13 using legal process to threaten subpostmasters?

14 A. It's quite possible, yes.

15 Q. Is that perhaps part of the sort of setting of what

16 we've seen in your own correspondence of this sort of

17 putting the burden of proof on the subpostmasters --

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

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

20 A. No, I don't think I've ever threatened anything like

21 that. I've tried to -- where I can see a way of

22 investigating/helping, I've tried to do that.

23 Q. Some very brief questions, if I may, on the document

24 which we've looked at quite a lot, the receipts and

25 payments mismatch meeting. I just want to look at the

171

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

2 you.

3 There's one thing that I'd like to just ask you

4 about before we go to the bottom. We see the reference

5 to -- he says:

6 "Your letter is ... a repeat of ... previous

7 letter and is similar in style to those I have received

8 from Michele Graves and Philippa Wright (Flag Case

9 Managers for Adam Crozier/Alan Cook)."

10 Do you know what a "flag case manager" was?

11 A. No.

12 Q. Do you know those names?

13 A. Alan Crozier and Alan Cook, yes. The two ladies, no.

14 I can't remember them.

15 Q. What about the two gentlemen?

16 A. They were heads of Post Office.

17 Q. They were seniors?

18 A. Well, they were executive directors.

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

20 them?

21 A. No.

22 Q. If we go a bit further down, we see that Mr Bilkhu tells

23 you, "In summary", it says:

24 "... POL may consider the matter closed [that's

25 his complaint] but I do not. According to my legal team

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1 first page of it again, if I may. It's POL00028838. If

2 we just look at those Post Office names, who would you

3 say was the most senior person there?

4 A. Ian Trundell, although Alan Simpson I don't know what

5 grade he was at.

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

7 A. Alan Simpson.

8 Q. All right.

9 A. Well, I'm guessing there. I don't actually know what

10 grade anyone was at.

11 Q. But your first reaction was that those were the two

12 senior people that meeting?

13 A. Yes.

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

15 Presumably Mr Ismay?

16 A. Yes.

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

18 A. I'm -- whether I've talked directly to Mr Ismay or

19 Mrs Bolsover, I'm not certain, but I would certainly

20 have fed back as part of normal communications.

21 Q. Thank you. The document can be taken down.

22 So you are saying you would have reported back to

23 Mr Ismay and Ms Bolsover; is that right?

24 A. Yes.

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

172

1 at, sir, if I may?

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

3 questions?

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

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

6 Ms Page.

7 **MS PAGE:** Thank you. If I can look then, please, at

8 POL00105280. If we could look at page 3 -- and I won't

9 take you through the whole history up to page 3. Page 3

10 sort of dives in.

11 This is in the summer of 2013, so this is post

12 receipts and payments mismatch bug and around the time

13 when Second Sight's work is pretty well known within

14 about Post Office, yes, and you're asking a contracts

15 manager -- this is a discussion with a contracts manager

16 having been in touch with a branch about a loss that

17 dates back ten years, and this is your putting three

18 possibilities for how to deal with it to the contracts

19 manager. You say:

20 "Hi Nigel, I don't actually disbelieve the branch

21 here but the claim that two sets of auditors have

22 recorded missing stock as being present is a bit scary.

23 Stamps are just pieces of paper at Swindon so there

24 would not have been a surplus at another branch.

25 "I can see three options. Pay up - we don't

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1 what's quite interesting is that the response from the

2 network manager says in paragraph 3 here:

3 "As you say, none of the options are particularly

4 appealing. I think the first option, making the SPMR

5 pay up, could open up a can of worms. I'm not sure that

6 the SPMR is a member of the NFSP but, given that the

7 amount involved represents a significant percentage of

8 his salary, I feel sure he would take this further.

9 This could put us in a position of trying to defend

10 ourselves against a charge that the auditors didn't do

11 their job properly and could potentially give the NFSP

12 or an MP some useful ammunition."

13 So it's again this idea really, isn't it, that

14 it's about the ammunition, it's about MPs, it's not

15 really about doing the right thing?

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

17 right thing.

18 **Q.** Well, you did do the right thing but, rather than just

19 doing the right thing, you're discounting other options

20 not on the grounds that they're wrong or because you

21 actually believe the branch but because it could

22 potentially give the NFSP or an MP some useful

23 ammunition?

24 **A.** And I think that would be true if we're saying that two

25 sets of audits were both incorrect. That's not the kind

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1 believe you. Create a phantom rem out, branches can now

2 invent ten year old errors that we have to let them off

3 on because we do not have any information about. Plus

4 Swindon will not pick up a phantom rem, so I can rem

5 stamps out and just sell them on my retail side."

6 I think that seems to be a suggestion that you're

7 making for a way to sort of balance it off. Is that how

8 I should read that?

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

10 yes.

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

12 "We believe you and we're making a gesture in

13 recognition of long years of accurate accounting and his

14 TC rate is excellent. However, this does leave huge

15 question marks over the audit process. None are

16 particularly appearing. Thoughts?"

17 First of all, it's a bit striking, isn't it, that

18 one of the options is "we don't believe you" when you've

19 actually said at the start of the email, "I don't

20 actually disbelieve the branch here"?

21 **A.** I think what I'm trying to do there is make the first

22 two look at what they were, totally unappealing options,

23 and the third one is where we're going.

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

25 If we go up to the next response, though, page 2,

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1 of thing you want to advertise particularly when you

2 don't know if that's the case.

3 **Q.** Well, you do know it's the case. That's the

4 investigation. That's what's happened.

5 **A.** Well, no, we don't. That was the problem with this

6 case, that we could understand what the guy was saying

7 but he's saying that two sets of auditors have come in,

8 audited the branch. He said there's an issue with these

9 which is going to get -- needs resolving. So the

10 auditors have said, "Okay, we'll assume that they're

11 there". If they weren't there, I mean, that's what an

12 auditor's job is -- to identify discrepancies. So for

13 two of them to go in and not, would suggest that any

14 audit cannot be relied upon.

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

16 **A.** I don't disbelieve the postmaster but I don't believe

17 that two auditors have not done their job properly. So

18 I'm left a little bit I don't know where we are anyway.

19 **Q.** Just one last, if I may, because this brings us up

20 a little bit more to date and it's POL00092640 and this

21 dates from 2015.

22 This seems to relate to what we've come to

23 understand were weekly Horizon meetings. These were

24 regular calls -- is that right -- with lawyers involved

25 as well, people from the security team. Do you remember

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1 a weekly Horizon meeting being instituted in around 2013
 2 and carrying on for some time apparently?
 3 **A.** I don't particularly remember it being a weekly meeting,
 4 though I accept that it could have been.
 5 **Q.** You do remember the Horizon meetings, do you?
 6 **A.** I remember being on Horizon meetings. Whether I was on
 7 the weekly ones or not I'm not certain.
 8 **Q.** Well, certainly in relation to this one, it's referring
 9 to one that's taken place in August of 2015 and it says:
 10 "As you will see there were numerous issues raised
 11 on the last call which are of concern."
 12 First of all, it says:
 13 "Andy Winn is still receiving requests to
 14 authorise FJ to correct problems."
 15 Presumably that's Fujitsu?
 16 **A.** Mm-hm.
 17 **Q.** And what I understand that to mean -- and you correct me
 18 if I'm wrong -- is that that's Fujitsu asking to go into
 19 Horizon to correct problems and you're authorising them
 20 to do so. Is that what's going on there? Is that the
 21 process?
 22 **A.** I'm not sure what Fujitsu wanted to do but, yes, it's
 23 asking me to authorise them to do something. I don't
 24 know what from here.
 25 **Q.** Well, we've actually got three issues that come up. The
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1 of joined up with that, but certainly as far as I was
 2 concerned that wouldn't be the case.
 3 **Q.** Then the paragraph below, just to finish off on this:
 4 "Andy Winn also raised the issue of a computer
 5 problem with Camelot for which a fix had been issued but
 6 pointed out that branches would encounter unexplained
 7 losses that Wednesday when they conducted their BTS
 8 procedure. He went on to explain that he had received
 9 an email from Fujitsu about an incident which had
 10 occurred in June. It was termed a 'major incident
 11 report' and related to a branch which had an incorrect
 12 discrepancy at the time of conducting a branch trading
 13 statement. The email suggested that information had
 14 been sent to POL. Andy Winn had not previously known
 15 about this issue and so asked to whom the information
 16 had been sent. He had no response.
 17 "Andy went on to say that he did not fully
 18 understand the issue and that a maximum of 247 branches
 19 would have been affected. 118 of those would have
 20 generated reports based on corrupted data. There was
 21 only one account in connection with which POL could have
 22 held someone responsible for the shortfall."
 23 So in 2015, following the receipts and payments
 24 mismatch bug, following the fact that Second Sight have
 25 become involved, following the fact that that means that
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1 first one is that they asked to do this when kit is
 2 removed from branches which can cause issues and then,
 3 secondly, there's the discontinued sessions issue which
 4 has gone on to explain further, and it talks about two
 5 new products which caused the system to disconnect and
 6 recovery scripts are failing.
 7 So these are two different things which seemingly
 8 they're having to go into the system to correct and
 9 you're having to sign off on the process. Is that
 10 something you recall doing?
 11 **A.** I would imagine -- I could see myself being the voice
 12 that would give POL approval, yes, if that makes sense.
 13 **Q.** It says in the latter part of that paragraph:
 14 "This is apparently standard business as usual and
 15 FJ seek authorisation to correct it. It is unclear at
 16 the present time whether or not there is process
 17 assurance and documentation. I do not know whether POL
 18 have full visibility of the actions of Fujitsu and the
 19 ways in which they correct the branch data."
 20 Does that ring a bell?
 21 **A.** It doesn't ring a bell but it makes sense to me.
 22 **Q.** That there wasn't really a process that was being
 23 followed?
 24 **A.** And that I was -- I think I, possibly naively, assumed
 25 that the IT department were the ones who would be kind
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1 it became apparent that the receipts and payments
 2 mismatch bug still hadn't been followed up properly,
 3 you're still having problems, aren't you, at POL with
 4 actually getting on top of and dealing with bugs that
 5 affect corrupted data?
 6 **A.** Is this a receipts and payments mismatch issue?
 7 **Q.** I don't believe it is. I believe it seems to be
 8 a different issue. But this is evidence, is not, that
 9 POL and Fujitsu are still not working through proper
 10 procedures --
 11 **A.** Yes, I think so, yes.
 12 **Q.** All right.
 13 **SIR WYN WILLIAMS:** Are you going to end on a high note,
 14 Ms Page?
 15 **MS PAGE:** Thank you, sir.
 16 **SIR WYN WILLIAMS:** Is that it, Mr Beer?
 17 **MR BEER:** Yes, sir. That concludes the questioning of
 18 Mr Winn.
 19 **SIR WYN WILLIAMS:** Thank you, Mr Winn, for coming to give
 20 evidence. It's been a long day clearly.
 21 **A.** It certainly has.
 22 **SIR WYN WILLIAMS:** I'm grateful to you that you came to give
 23 the answers to very many questions.
 24 **A.** I hope I could be some help.
 25 **SIR WYN WILLIAMS:** Thank you.
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1 **MR BEER:** Sir, thank you. I think that's us done now until
 2 Tuesday, 7 March when we will hear evidence from Liz
 3 Evans-Jones.
 4 **SIR WYN WILLIAMS:** Yes, all right. Thanks very much.
 5 **MR BEER:** Thank you, sir.
 6 **(4.10 pm)**
 7 **(Adjourned until Tuesday, 7 March 2023 at 10.00 am)**
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