

Wednesday, 5 July 2023

1
2 (10.15 am)
3 MR BEER: Good morning, sir, can you see and hear
4 us?
5 SIR WYN WILLIAMS: I can, yes.
6 MR BEER: Thank you, may I call Mr Marsh, please.
7 SIR WYN WILLIAMS: Of course, yes.
8 ANTHONY NICHOLAS STEWART MARSH (affirmed)
9 Questioned by MR BEER
10 MR BEER: Good morning, Mr Marsh. My name is Jason
11 Beer, as you know, and I ask questions on behalf
12 of the Inquiry. Can you give us your full name,
13 please?
14 A. Anthony Nicholas Stewart Marsh.
15 Q. Thank you very much for coming to the Inquiry
16 today to assist us in our work, and also for
17 providing a long and detailed witness statement
18 to help the Inquiry in its investigation. You
19 should have in front of you a hard copy of that
20 witness statement. It's in your name and dated
21 27 April 2023. If you turn to the last page of
22 it, which is page 42, is that your signature?
23 A. I've done that and it is my signature, yes.
24 Q. Are the contents of that witness statement true
25 to the best of your knowledge and belief?

1

1 officer --
2 A. I did, yes.
3 Q. -- and performed thereafter a range of
4 operational roles over the next 14 years, rising
5 to the rank of Head of Revenue Protection in
6 what was then called the Post Office Security
7 and Investigation Service; is that right?
8 A. That's correct, yes.
9 Q. In September 1999, you became Head of Security?
10 A. I became Head of Security for what was at the
11 time known as Post Office Network, yes.
12 Q. A position you remained in until December 2006?
13 A. That's correct.
14 Q. It's that period of time, seven years or so, as
15 Head of Security, that the Inquiry is
16 principally interested in, and you'll understand
17 why. It's because it spans the introduction of
18 the Horizon System --
19 A. Indeed.
20 Q. -- 1999 to 2006, and it encompasses the period
21 of time when the first prosecutions based on the
22 Horizon System took place?
23 A. As I understand it, yes.
24 Q. It's a substantial period of time, as well,
25 seven years of the 13 or so years in which

3

1 A. They are.
2 Q. For the transcript -- it needn't be displayed --
3 the URN of that witness statement is
4 WITN06900100.
5 I'm only going to ask you questions today
6 about issues which arise in Phase 4 of the
7 Inquiry, principally concerning policy,
8 procedure, practice and doctrine of the Post
9 Office in the investigation and prosecution of
10 alleged offenders; do you understand?
11 A. Yes.
12 Q. In terms of your background, you, I think,
13 joined the Post Office in 1981; is that right?
14 A. That's correct.
15 Q. As a postman?
16 A. Indeed.
17 Q. Was that effectively straight from school?
18 A. More or less, yes.
19 Q. You became a counter clerk in 1983?
20 A. That's correct.
21 Q. You then joined the Post Office Investigation
22 Department, POID, in 1985, is that right,
23 September 1985?
24 A. That's right, yes.
25 Q. You joined, I think, as an investigation

2

1 subpostmasters were convicted of criminal
2 offences based on data generated by Horizon.
3 Before we get to that, can we just roll back.
4 Your role as an investigation officer, from 1985
5 to 1999, working in the Post Office
6 Investigations Department. What was your role?
7 A. My role was to investigate a wide range of
8 crimes against the Post Office committed by
9 employees, by subpostmasters or their employees
10 and, occasionally, by members of the public or
11 customers.
12 Q. What was the proportion, in general terms, of
13 staff, using that umbrella term, "suspected
14 crime", versus members of the public suspected
15 crime?
16 A. Oh, it was very much more about staff. In later
17 years we perhaps focused more on revenue fraud
18 but at the time when I joined, we were looking
19 very much, and predominantly at postmen stealing
20 from the post, less so counter clerks and, less
21 so again, subpostmasters.
22 Q. Did you, in that period of time of 14 or so
23 years, investigate cases of subpostmasters,
24 counter clerks and other employees of Crown
25 branches committing suspected criminal offences?

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1 **A.** I did yes.
 2 **Q.** What was the nature of your role as
 3 an investigator? What did you do?
 4 **A.** Literally, I investigated -- so from the point
 5 in time at which the suspicion was raised by
 6 either circumstance or by line management or
 7 possibly even by the receipt of information that
 8 a crime had been committed, that would be
 9 allocated to an appropriate investigator and, at
 10 the time, we were geographically based -- so
 11 I worked in north London, for the majority of
 12 the time that I was an investigation officer --
 13 and I would undertake an investigation in much
 14 the same way as a police officer in the CID
 15 would.
 16 I would follow leads, I would look at
 17 evidence, paper evidence in those days, usually.
 18 I would interview people, take statements, and
 19 the aim was to obtain all possible evidence, so
 20 that is to say evidence that supported
 21 an allegation that I was pursuing but, at the
 22 same time, evidence that might in some way
 23 undermine that allegation and all evidence that
 24 might mitigate the circumstances that
 25 I discovered.

5

1 expected to assure the quality of investigations
 2 that took place.
 3 **Q.** How was quality assurance undertaken by the
 4 SIOs?
 5 **A.** Every region -- the term we used was "mump", and
 6 it's a very old term that meant beggar, and the
 7 reason we used that term was because the
 8 individual doing that job, and it was a job that
 9 everybody did on rotation earned no travel or
 10 subsistence expenses. It's just a word we use.
 11 So they had a casework manager working for
 12 them. At regular intervals cases would need to
 13 be sent into the casework manager, so you would
 14 update on the progress of an Inquiry. You would
 15 update -- you were required to update when you
 16 had interviewed a suspect and you were required
 17 to get that update in within two weeks, and we
 18 used to aim to do so within a matter of days.
 19 At that point, the quality of both investigation
 20 and interview would be assessed and usually, at
 21 that point, the case would then make its way for
 22 the first time to one of the Post Office's
 23 lawyers in the Legal Services team who would
 24 assess progress to date, give advice on any
 25 further investigation that was required and,

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1 **Q.** Were you part of a team?
 2 **A.** I was, yeah.
 3 **Q.** How many were in the team, roughly?
 4 **A.** Well, overall in the POID at that time there
 5 were about 100 investigation officers. We were
 6 split into regions and I think, off the top of
 7 my head, that was nine regions. So there would
 8 be something of the order of 11 or 12
 9 investigators -- investigation officers with
 10 a senior investigation officer at the head.
 11 **Q.** Was that the manager of the regional team,
 12 the --
 13 **A.** Yes, the regional manager, indeed, as that
 14 person was known, was known in those days as
 15 an SIO, Senior Investigation Officer.
 16 **Q.** Did they have more senior investigatory
 17 responsibilities or was their job mainly as
 18 a manager of people?
 19 **A.** They did have more senior investigatory
 20 responsibilities. So in a very sensitive case
 21 or a case involving more senior personnel, you'd
 22 normally get a Senior Investigation Officer
 23 leading that. They were predominantly
 24 supervisory and, whilst they were leaders of the
 25 team, they were also the individuals who were

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1 indeed, if the investigation had been adequate
 2 and successful, would give advice on possible
 3 prosecution.
 4 **Q.** Who would decide whether an individual was or
 5 was not to be prosecuted?
 6 **A.** So at all times, at all stages in my career, in
 7 all of the roles that I did, it would be
 8 a member of the business line management for the
 9 offender, or the suspect, who would make that
 10 decision.
 11 **Q.** So if we just break that down: for
 12 a subpostmaster, who would be that business
 13 manager?
 14 **A.** For a subpostmaster it would be a person --
 15 they've had a lot of names over the years, but
 16 the term that I best recollect myself is the
 17 Retail Network or Retail Line Manager, and
 18 that's the first line manager for a cluster of
 19 post offices -- at one time a cluster which
 20 would include both Crown and sub post offices.
 21 Later, I believe, Retail Network Managers
 22 managed either sub or Crown offices.
 23 **Q.** So would that be somebody who the subpostmaster
 24 would be familiar with on a daily or maybe
 25 weekly basis as their line manager?

8

1 **A.** It would normally be the subpostmaster's primary
 2 point of contact with the business, primary
 3 human point of contact with the business, yes.
 4 **Q.** At all times, they took the decision on
 5 prosecution?
 6 **A.** Sorry. At all times, they or somebody within
 7 their line -- and by "within their line" I mean
 8 somebody more senior than them -- would take
 9 that prosecution decision, yes. It wasn't
 10 a decision taken by the investigator. It wasn't
 11 a decision taken by anybody within the
 12 investigation team and it wasn't a decision
 13 taken by the lawyer.
 14 **Q.** You said that sometimes it might be more senior
 15 than that business manager. In what
 16 circumstances might a more senior person than
 17 the business manager end up taking the
 18 prosecutorial decision?
 19 **A.** I can remember circumstances where the first
 20 line manager felt uncomfortable making that
 21 decision. It wasn't something that they'd
 22 signed up to do. And, indeed, you know, it was
 23 a very rare event. We didn't prosecute a vast
 24 number of people in each year so many line
 25 managers would not, in a year -- or indeed

1 **A.** Not in -- well, initially I -- I mean, each of
 2 the investigators had a team of local staff. So
 3 I did have local staff members who did the, if
 4 you will, the running for me, who went and, you
 5 know, got forms and found out information and
 6 found out when people were on duty, and things
 7 like that. So I did manage people at a lower
 8 level. Obviously, as my career progressed,
 9 I managed larger and larger teams of
 10 investigators.
 11 **Q.** What were these people at a lower level called?
 12 **A.** They were called Officers in Confidence and it
 13 was a posting in a local office, which would go
 14 to a volunteer, perhaps somebody who was
 15 thinking about trying to join the Post Office
 16 Investigation Department, and it gave them
 17 a chance for a few years to work alongside
 18 investigators, understand what it was we did and
 19 there was a certain cachet for some people to
 20 doing that job.
 21 **Q.** Why were they called Officers in Confidence?
 22 **A.** Because that was exactly what they did. They
 23 were officers in the local office. The role
 24 that they undertook was in confidence and so,
 25 confidentially, they would go out and find out

1 occasionally, you know, in their entire
 2 career -- come across what was known, in those
 3 days, as an ID case. So some people didn't feel
 4 comfortable taking that decision, and the
 5 natural process then was to encourage them to
 6 bump it up to their -- to somebody more senior
 7 than them but somebody within their line.
 8 **Q.** Why did they feel uncomfortable?
 9 **A.** I would be making assumptions now but, as I say,
 10 I think, from some of the feedback I've had,
 11 some people felt it was not a role that they had
 12 necessarily signed up to do and it has a very --
 13 obviously has a very significant impact,
 14 prosecution, on somebody who they may have known
 15 well and may have felt friendly towards, you
 16 know. By no means -- indeed, very few of our
 17 offenders, employee offenders or agent
 18 offenders, were difficult or unpleasant people.
 19 Circumstances often conspired to put them in
 20 that decision but I could understand why it
 21 would be difficult for their line managers
 22 perhaps to think of them as a person who's
 23 committed a crime.
 24 **Q.** Did you manage anyone in this period when you
 25 were an investigator?

1 information for us, get hold of -- I'm
 2 thinking -- I mean, more frequently this was
 3 obviously to do with postmen rather than counter
 4 clerks or subpostmasters, but they would get
 5 signing on sheets to demonstrate when people
 6 were on duty, a lot of other documentation, the
 7 kind of things that were the start point for
 8 most investigations.
 9 **Q.** By 1998, you had been promoted to the position
 10 of Head of Revenue Protection?
 11 **A.** That's correct.
 12 **Q.** What was the job of revenue protection?
 13 **A.** Well, Revenue Protection was the team that
 14 looked outside Royal Mail -- no, I think we were
 15 still called the Post Office at the time --
 16 looked outside the Post Office at customers,
 17 usually businesses, that were in one way or
 18 another defrauding Royal Mail.
 19 **Q.** What did your job as Head of Revenue Protection
 20 involve?
 21 **A.** It involved leading a team of very experienced
 22 investigators who worked frequently with police
 23 forces around the country. We would --
 24 information came in to us from a variety of
 25 sources. We had a lot of Revenue Protection

1 personnel on the ground. These were postmen
2 with the particular role of weighing the mail as
3 it came in, amongst other things, and, you know,
4 if what they were seeing didn't accord with the
5 statements being made by business customers and
6 with the payments being made by business
7 customers, then many efforts would be made to
8 rectify a situation before it was passed across
9 to us.

10 But where there was evidence of attempts to
11 hide activities that were benefiting the
12 business and costing the Post Office money, or
13 where it was suggested that some of our own
14 staff might have been corrupted, and that did
15 happen on occasion, then we would mount
16 an investigation and the aim of the
17 investigation would be to identify the
18 offenders, both internal and external, and
19 frequently to charge a conspiracy against the
20 Post Office.

21 **Q.** Can I just ask you to slow down your delivery
22 a little.

23 **A.** Sorry, yes.

24 **Q.** There's a shorthand writer who takes a note of
25 what you say and it's important that she is able

13

1 reorganisation process called Shaping for
2 Competitive Success. This had created the
3 business unit that I was initially appointed to,
4 which was called Post Office Network, and
5 alongside that another business unit called
6 Network Banking and that was the business unit
7 that owned all of the products that were sold in
8 post offices, all the products barring stamps,
9 which were still owned by the Letters side --
10 it's very complicated, I shall try to keep it
11 simple.

12 Post Office Network was organised into three
13 regions: East, West and North. When I went in,
14 I appointed three people to be -- sorry, they
15 were called "territories" because I appointed
16 three people to be Territorial Security Managers
17 to these three territories. And at the time,
18 I had been bequeathed, by the team that created
19 Post Office Network, an operation which involved
20 essentially everybody being expected to do
21 everything. So although, within that team of
22 250 people, I had people who had primarily been
23 investigators, people who had primarily been
24 security managers, people who had primarily been
25 technical security managers, they were all sort

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1 to keep up.

2 **A.** Certainly.

3 **Q.** At this stage, when you were head of Revenue
4 Protection, did any of your responsibilities
5 extend to the investigation of subpostmasters or
6 counter clerks?

7 **A.** No. It's just possible that there might have
8 been one or two investigations that involved
9 mail being left at a sub post office but, in
10 essence, no. This was a Royal Mail or a letters
11 operations oriented role.

12 **Q.** From 1999 to 2006, you became Head of Security
13 for the Post Office Network.

14 **A.** That's correct.

15 **Q.** How many people did you manage in that function?

16 **A.** From memory, I -- when I took that team over, we
17 had something of the order of 250 people at the
18 outset.

19 **Q.** Were they still arranged by reference to the
20 nine regions, nine or so regions, that you
21 mentioned earlier?

22 **A.** They were arranged by that time in three -- you
23 might call them super regions, I think. Three
24 large regions that had been -- the whole of the
25 Post Office had been through a massive

14

1 of lumped together and, if I can second-guess
2 one of the next questions you're going to ask,
3 within about a year to 18 months, I restructured
4 that team so that we had an investigation or
5 criminal investigation team, an external crime
6 team and a physical security team, and then some
7 administrative functions around that.

8 **Q.** Thank you. If we can just turn to page 4 of
9 your witness statement, please, which is
10 WITN06900100. Thank you. Page 4 of the witness
11 statement. It'll come up on the screen for you.

12 **A.** Yes.

13 **Q.** Look at the foot of paragraph 5. You're being
14 asked in paragraph 5 about Horizon and a meeting
15 being held in October 1999.

16 **A.** Yes.

17 **Q.** About halfway through, so about ten lines in,
18 you say:

19 "... but in more general terms I believe
20 that, as the initial iteration of Horizon was
21 an automation of much of the accounting and
22 balancing process for branch and sub post
23 offices, the impact was expected to be
24 a variation in where evidence on stock, cash and
25 accounting reports for an office would come

16

1 from, from hand-complete paper records to
 2 computer-stored data, which would be produced by
 3 the Horizon System ..."

4 Then you say this:

5 "... although I did not know then nor did
 6 I ever learn exactly how evidence from Horizon
 7 was obtained."

8 **A.** Yes.

9 **Q.** If we can just move forwards, please, to page 35
 10 of your witness statement and look at
 11 paragraph 59. You say:

12 "I have been asked 'For the period of time
 13 you held relevant roles, please explain the
 14 process for requesting Horizon data from Fujitsu
 15 and how that process changed over time'."

16 You answer:

17 "I can say that at no point in my time at
 18 POL did I have any requirement to request
 19 Horizon data from Fujitsu, that I never
 20 requested data from Fujitsu and that I cannot
 21 explain anything about the process or how it may
 22 have changed over time."

23 Presumably in the period between 1999 and
 24 2006, when you were Head of Security, you were
 25 aware of the introduction of the Horizon System.

17

1 you knew about obtaining of evidence by members
 2 of your team from Horizon in order to progress
 3 investigations and found prosecutions.

4 That can come down from the screen now.

5 Would you agree that the use of the Horizon
 6 System was going to involve a very substantial
 7 change to the method of working for postmasters
 8 and counter clerks within branches.

9 **A.** Right. As I understood it at that time, the
 10 initial iteration of Horizon was, as far as
 11 possible, a sort of cut and paste, almost, from
 12 the paper accounting process. So you're
 13 absolutely right that, obviously, having
 14 a screen, a touchscreen, in front of you and
 15 a keyboard was very, very different to lots of
 16 bits of paper and a hand date stamp. But as
 17 I understand it, most of the processes -- as
 18 I understand it, most of the processes initially
 19 were very similar. What people were being
 20 taught was essentially where to find things on
 21 the Horizon System.

22 **Q.** So do you agree or disagree with my suggestion
 23 that the introduction of Horizon was going to
 24 involve a substantial change to the method of
 25 working?

19

1 **A.** Absolutely. All I'm trying to point out in
 2 those two paragraphs is that because I, by that
 3 stage, was responsible for a much wider range of
 4 accountabilities in Post Office Network/Post
 5 Office Limited, and because I had two -- one
 6 after the other -- very effective senior
 7 managers as heads of the investigation team,
 8 I never really needed to get hands-on in the
 9 investigation space. And one of the things
 10 I never had to do was, other than when -- all
 11 managers in the Post Office would go and help
 12 out at Christmas. So for several years,
 13 I helped out for a week or two on the counter at
 14 Christmas. I have actually used the Horizon
 15 System as though I were a counter clerk and
 16 I know what it looks like, but I've never had to
 17 do anything investigative with the system.

18 **Q.** I'm not at the moment focusing on any
 19 investigation you yourself would have conducted
 20 because I suspect you conducted no
 21 investigations --

22 **A.** Indeed.

23 **Q.** -- when you were Head of Security for this
 24 seven-year period. My questions that follow
 25 were all focused on what, as Head of Security,

18

1 **A.** Well, it unquestionably did, but I think what
 2 I'm trying to just emphasise, from my position
 3 of understanding, is I don't think that the
 4 operational processors, the way in which cash
 5 was brought to account, the way in which stock
 6 was checked and things like that, I don't think
 7 they changed significantly at the beginning, no.

8 **Q.** Would you agree with this then: that the
 9 introduction of Horizon was going to present
 10 a fundamental change for the Security Department
 11 as to the sources of evidence that it might
 12 obtain to investigate offenders suspected of
 13 fraud, theft or false accounting?

14 **A.** Yes. From just getting hold of the paper
 15 balancing sheets prior to Horizon, I know that
 16 my investigators had to, in some manner, obtain
 17 the data and the printouts from Horizon relating
 18 to an office and its balancing, sort of its
 19 balancing processes.

20 **Q.** What preparation did the Security Department
 21 make under your leadership for the introduction
 22 of Horizon?

23 **A.** As far as I recollect, there was training given
 24 to our investigators, both in how Horizon itself
 25 worked and also in the methods by which they

20

1 would obtain data, and the particular data which
2 they could obtain, and -- I don't know whether
3 there was data they couldn't obtain but,
4 essentially, what data they could expect to be
5 able to garner from the system.

6 **Q.** Who delivered that training?

7 **A.** I believe that arrangements were made for --
8 there was a training team, so there were a team
9 of trainers within the Horizon Programme itself,
10 who were training counter clerks and
11 subpostmasters, and I believe that training was
12 given to members of my team by members of that
13 team.

14 **Q.** Those trainers, who were training subpostmasters
15 and counter clerks, also trained members of your
16 team, the 100 or so, in the data that they could
17 obtain and the data they could not obtain; is
18 that right?

19 **A.** You are getting into a level of detail now where
20 I'm going to have to make an assumption and say
21 I believe so, yes, but I have no direct
22 experience myself of that training.

23 **Q.** Was this not a big issue for the Security
24 Department at the time, involving fundamental
25 change, in which you would have involved

21

1 the time, were aware of the requirements that we
2 had from Horizon.

3 **Q.** But the position was that you, as Head of
4 Security, didn't know anything about the process
5 yourself, what data was obtainable, from whom it
6 was obtainable, what data was not obtainable,
7 and why, and how any of those things changed
8 over time?

9 **A.** That's correct, yeah. I had a very wide range
10 of responsibilities and that was one that seemed
11 to me, at the time, to be going well and didn't
12 need my direct involvement.

13 **Q.** On what evidence did it seem to you to be going
14 well, the obtaining of data from the Horizon
15 System, to investigate and then prosecute
16 subpostmasters?

17 **A.** On the basis that I was not getting feedback
18 that it was not going well.

19 **Q.** So silence?

20 **A.** It wasn't silence because I spoke with my
21 security leaders and with, subsequently, my Head
22 of Investigation regularly. So it wasn't
23 silence but it was confidence that they could
24 get access to the data that they needed.

25 **Q.** Would you agree, looking back, that what should

23

1 yourself?

2 **A.** It was something which I certainly made sure
3 that my direct report, as head of
4 investigations, Phil Gerrish -- well, initially
5 the territorial security managers, and then
6 subsequently Phil Gerrish, as Head of
7 Investigations, were comfortable that things
8 were progressing in the right direction.

9 **Q.** What steps did you take to ensure that the
10 process of obtaining data was reliable and
11 sound?

12 **A.** No specific steps. It was very much part of the
13 programme and we did have people who were
14 working alongside the programme at various
15 points to make sure that the information --
16 well, yes, to make sure the information that we
17 required was available to us.

18 **Q.** How did that process go about, ie how did you
19 establish what information you required?

20 **A.** There were workshops that took place and members
21 of the investigation team. And, indeed, prior
22 to my arrival in 1999, various members of
23 various security teams had been part of these
24 workshops to make sure that the Horizon
25 Programme and ICL Pathway, as it was known at

22

1 happen is that there should be a series of
2 written protocols or policies that describe the
3 full suite of data that the Horizon System
4 produces, its retention periods, how it is to be
5 obtained, where it is to be obtained from, who
6 is the gatekeeper for the obtaining of it,
7 whether a fee is to be payable to the company
8 that runs the computer system for the obtaining
9 of that data, whether permissions are needed,
10 which forms are to be filled out, whether
11 there's a quality assurance process -- those
12 kind of things?

13 **A.** Yes, and it's my belief that those kind of
14 things were in existence, yes.

15 **Q.** Amongst, I think, the 54 million documents that
16 the Post Office has said that it has in its
17 document universe, and I think amongst the
18 117,000 of them that it's given to us, we
19 haven't got any of those things. Would that
20 surprise you?

21 **A.** Well, based on discussions that I've had with
22 the Inquiry Team about documents that I knew to
23 exist that have not been made available to the
24 Inquiry, it doesn't surprise me that you don't
25 have access to those documents, no. There was

24

1 a process within all of the business units of
2 the Post Office/Consignia/Royal Mail, to make
3 sure that documents that people were relying on
4 to do their jobs were up to date.

5 One of the side effects of that is that
6 older documents will have been archived and it
7 sounds to me, from what I've heard from the
8 Inquiry, that many of the archived documents
9 have not been -- are not available or have not
10 been made available yet.

11 **Q.** Just to be clear, when you say what you've heard
12 from the Inquiry, you've been provided with
13 a copy of the report of Duncan Atkinson KC, yes?

14 **A.** Yes, that's right, yes. That's in a slightly
15 different context but it's clear to me that
16 a report that was written had to be written
17 without access to the full suite of documents
18 that I'm aware existed.

19 **Q.** We're going to go on and discuss that later on
20 today, policy documents that you say that did
21 exist that addressed the issues that Mr Atkinson
22 says are defects or failures in POL's policies
23 and processes?

24 **A.** Yes.

25 **Q.** Going back to the Horizon data, can we look,
25

1 worked in any investigative context with Horizon
2 and so I didn't have any need to know exactly
3 what documentation it was that my investigators
4 relied upon.

5 **Q.** That can come down. Thank you. You've said
6 that others amongst the 100 had the
7 responsibility for attending training and
8 workshops that mirrored the needs of the
9 introduction of the Horizon System. Who were
10 the, underneath you, most senior managers within
11 the investigation division that attended such
12 workshops, had such training and attended to the
13 issues that I've mentioned?

14 **A.** My first Head of Investigation was Phil, Philip
15 Gerrish, he was followed by Tony Utting and they
16 then had a number of team leaders below them,
17 and I honestly wouldn't wish to try to come up
18 with all the names of the team leaders. But we
19 had geographically-based teams with a team
20 leader and then what you might call frontline
21 investigators beneath them.

22 **Q.** Amongst those, the team leaders or those above
23 them, Mr Gerrish and his successor, who had
24 responsibility for engaging with those on the
25 Horizon Programme and, potentially, Fujitsu over
27

1 please, at paragraph 60 of your witness
2 statement, which is on page 36. Paragraph 60,
3 it's the top paragraph. You say:

4 "I have been asked 'What were ARQ logs and
5 what did you understand their use to be? What
6 other logs were you aware of and how did they
7 differ?'"

8 You say:

9 "I can say that I have no idea of what ARQ
10 logs are, nor am I aware of any other logs in
11 respect of Horizon."

12 We now know ARQ logs to have been, amongst
13 the security and investigation teams,
14 a well-known and understood source of
15 information, including in relation to error
16 control. How is it that in your role as Head of
17 Security, you didn't know about a key source or
18 at least a potentially key source of evidence
19 that could aid an investigation.

20 **A.** Because I was not working at that level of
21 detail. So I had presumed that that might well
22 be what they were but I didn't want to make that
23 presumption in a statement which I have to say
24 is true to the best of my knowledge. I have
25 never worked with ARQ logs, as I say, I've never
26

1 this fundamental change of a source of evidence
2 for investigation that Horizon heralded?

3 **A.** I couldn't give you a name other than Phil
4 Gerrish and then Tony Utting.

5 **Q.** Can you remember the periods of time for which
6 they held that role underneath yours?

7 **A.** Well, Phil was appointed by me, initially to the
8 Eastern -- I think I said territorial, and
9 actually it is Regional Security Manager role in
10 1999 and was always, as it were, my lead on
11 investigations. And then somewhere between 2000
12 and 2001, when I restructured the team, he
13 became the Head of Investigations or the
14 National Crime and Investigations Manager, and
15 I believe he left around about 2003 or 2004 to
16 take up a role in Royal Mail Group Security as
17 Director of Investigations, at which point Tony
18 Utting was appointed. And Tony, up to that
19 point, had been Phil Gerrish's deputy.

20 **Q.** Were you aware of provisions within the contract
21 between Post Office and Fujitsu that regulated
22 the circumstances in which, and the nature and
23 extent of which, data produced by the Horizon
24 System had to be provided by Fujitsu to the Post
25 Office?
28

1 A. Yeah, latterly, or at least I couldn't say when
2 I became aware but, at a certain point in time,
3 I became aware that there was a cap on the
4 amount of data in a year that my team could call
5 for, and I recollect having a discussion with my
6 then boss, the Operations Director, and just
7 making it clear if -- and the cap was not
8 absolute. From that point beyond the cap, we
9 would have to pay for any data that we required
10 and just making it clear that, if we required
11 data, we would have to find the money to pay for
12 it because we could not operate effectively
13 without access to that data.

14 Q. Is that the only provision of which you became
15 aware in this seven-year period the cap issue
16 and the money issue, rather than obligations in
17 the contract placed on Fujitsu as to the nature
18 of the data that it had to produce and its
19 suitability for use in court?

20 A. Well, I think that was always a principle, that
21 the data that they produced had to be suitable
22 for production in court. There's no question
23 about what that whatsoever.

24 Q. What developed policies existed to ensure that
25 Fujitsu did produce data that was, using the

29

1 was pitched.

2 A. Okay, yeah.

3 Q. We know that occasionally we have to prosecute
4 our subpostmasters and counter clerks. What
5 data is available to allow us to investigate
6 them, how will it be produced and does it
7 withstand the rigours, the evidential scrutiny,
8 that a criminal court, or indeed a civil court,
9 may apply to it?

10 That requires you to get involved, not to
11 sit back and wait for somebody to tell you that
12 there's a problem, doesn't it?

13 A. Well, not when the presumption -- and let's be
14 clear. At the outset -- because I think this
15 changed in mid-2000, at the outset, ICL Pathway
16 would have been required under the Police and
17 Criminal Evidence Act to produce a statement as
18 to the proper functioning of the system, and
19 I believe that such statements were produced
20 and, indeed -- and again, one of the questions
21 I asked was whether case papers could be
22 provided in some cases that had been raised with
23 me, but I understand they're not, they haven't
24 been made available to the Inquiry, so I can't
25 check this.

31

1 neutral word that I picked, "suitable" for use
2 in court?

3 A. All of this was part of the programme management
4 of ICL Pathway and then Fujitsu by the Horizon
5 Programme within Post Office Limited.

6 Q. But you were the Head of Security at the very
7 time that this was happening?

8 A. Mm.

9 Q. Did you not have a key role to perform?

10 A. Well, I'm not sure -- I think the key roll that
11 I would have had would have been -- and I'm sure
12 we're going to come on to this -- if I had had
13 any concerns or suspicions that there was
14 anything amiss with the evidence that was being
15 produced, if I was getting feedback either from
16 my own team or anywhere else within the
17 business, that either there was an absence of
18 information or that the information was in some
19 way questionable, but that wasn't the case.

20 Q. Doesn't that put the issue entirely around the
21 wrong way, Mr Marsh: that a fundamental change
22 in the way subpostmasters conduct their
23 business, and therefore the data that's
24 available to hold them to account, is going to
25 occur? It's a change in a generation, is how it

30

1 But I believe that similar statements were
2 produced by ICL Pathway and Fujitsu employees,
3 after the PACE requirements were rescinded, as
4 to the proper operation of the system. So that
5 was a source of assurance that the system was
6 working well and that the information that was
7 being provided by it was, as you said, suitable
8 for a presentation in court.

9 Q. Can I understand the effect of what you've just
10 said there, are you saying that because before
11 the repeal of section 69 of PACE, Fujitsu
12 employees signed a statement saying, as you put
13 it, that the computer is functioning properly,
14 and they continued to do so after the repeal of
15 section 69 of PACE, that was your assurance?

16 A. At no point in time was it raised with me,
17 within my team or elsewhere, that there was
18 an issue with the continuation of presentation
19 of data from Horizon. Had there been, I would
20 have taken suitable action.

21 Q. But wouldn't you want, as an investigator, to
22 find out what data does Horizon produce? Where
23 is it stored? How are they signing these
24 statements off saying that the system is working
25 well and satisfactorily and that the data that

32

1 is produced is reliable?
 2 **A.** Let me be clear, from a personal perspective,
 3 one of the parts of my job over the years that
 4 I have most enjoyed and gained most satisfaction
 5 from, was investigation. When I came into Post
 6 Office Network and then Post Office Limited,
 7 I had the responsibility for the safety and
 8 security -- safety from crime and security -- of
 9 65,000 or 70,000 employees, the majority of them
 10 in frontline customer-facing or public-facing
 11 roles, the protection of phenomenal amounts of
 12 cash.

13 All I'm trying to say is I had a great
 14 deal -- there was a lot going on in the security
 15 space that was not going well and that needed my
 16 attention and, as far as I was aware, the
 17 investigation team, the management and the
 18 investigation team, and the access that they had
 19 to data, was one of the things that was going
 20 relatively well. And so I -- you know, I would
 21 have loved, I'm sure, to have spent more time
 22 from a purely personal interest perspective,
 23 looking at it but I had a lot of other things
 24 that I had to keep on top of.

25 **Q.** What was more important than the prosecution of
 33

1 time, the majority of -- up to the completion of
 2 the rollout, the majority of offices were not
 3 yet Horizon offices.

4 **Q.** Are you saying for the majority of years
 5 between --

6 **A.** Statistically that doesn't work, does it?
 7 Between the point when Horizon started rolling
 8 out in, I think, 2000, and a point in time
 9 beyond that -- I don't know, the Inquiry might,
 10 I suspect it was around 2003 or 2004 -- we went
 11 from a very small minority of offices having
 12 Horizon to ultimately all the offices having
 13 Horizon. But for quite a period of time, the
 14 majority of offices were not Horizon offices.

15 **Q.** Are you giving that as a reason why wasn't
 16 necessary for you to have any training in the
 17 use and operation of Horizon, and find out
 18 anything about the data that it produced, and
 19 its suitability for use in criminal proceedings?

20 **A.** No. Not -- but not specifically. What I'm
 21 trying to indicate is it wasn't a sort of Big
 22 Bang. It was something going on gradually in
 23 the background, overseen by a very large --
 24 I mean a lot of senior managers in Post Office
 25 Limited had a stake in Horizon working well,
 35

1 subpostmasters?

2 **A.** Nothing is more important than ensuring that,
 3 where a prosecution takes place, this is done
 4 fairly and objectively, and that it is not --
 5 well, that it is just that: fair and objective
 6 and just. So let me say absolutely, at this
 7 point, I have always believed that but, at the
 8 times that we're talking about, I had nothing to
 9 make me think that these investigations were not
 10 taking place properly, suitably and fairly and
 11 justly.

12 **Q.** Did you have any training in the use and
 13 operation of Horizon?

14 **A.** Not at the time, not in the early days, no. So
 15 when I said I worked on the counter as a senior
 16 manager helping out at Christmas, one of these
 17 sort of, you know, go back to the shop floor
 18 things, that was in the latter years. So that
 19 was sort of 2003, 2004 and later. In the early
 20 days, there wasn't -- you know, the vast
 21 majority of offices were still operating on
 22 paper balancing.

23 Obviously, the rollout of Horizon, I don't
 24 know exactly how long that took but it certainly
 25 took several years and so, for the majority of
 34

1 obviously, all of the Network team, all the
 2 Product team.

3 I had a similar stake in it and the
 4 individual running the programme was part of the
 5 Operations Directorate team that I was part of
 6 for several years. So the feedback that the
 7 Operations team got, from a gentleman called
 8 Dave Smith -- not the Dave Smith who was the CEO
 9 but Dave "IT" Smith -- it was always positive.
 10 Always gave us to understand that the rollout
 11 was going well and, certainly, at no point in
 12 the time that I was at Post Office Limited, did
 13 I hear any concerns about the quality of data
 14 within the system or the quality of data
 15 produced by the system. And that's from within
 16 my own team or elsewhere within the business.

17 You know, there was a very positive feeling,
 18 if you will, that was promulgated throughout the
 19 business.

20 **Q.** Were you not made aware of acceptance issues,
 21 ie whether Horizon was performing as expected in
 22 accordance with the requirements of the contract
 23 during the development of Horizon?

24 **A.** I don't remember that, no.

25 **Q.** Were you not made aware of a series of
 36

1 significant acceptance issues during the rollout
 2 of Horizon?
 3 **A.** No.
 4 **Q.** Were you not made aware that the rollout had to
 5 be paused because of such serious issues?
 6 **A.** Not specifically, no. No. I mean, these may
 7 well have been things that came up, but all
 8 I can say is, had anything been raised that
 9 would have caused me concerns about the quality
 10 of the evidence that we were obtaining and
 11 relying upon, I can absolutely state that
 12 I would have become involved and that I would
 13 have taken steps to ensure that there was no
 14 risk whatsoever of us providing evidence or
 15 providing data as evidence that did not meet
 16 proper standards of evidential admissibility.
 17 **Q.** So what's, in your assessment, looking back
 18 here, generally, gone wrong? We now know that
 19 under your watch, on your watch, a number of
 20 people were wrongfully convicted, many of whom
 21 were sent to prison, on the basis of data that
 22 either was or may have been unreliable, and the
 23 unreliability of which wasn't disclosed to
 24 criminal courts. How has that come about?
 25 **A.** Could I ask one question first? Because again
 37

1 to court.
 2 **Q.** Why do you make that confident assertion?
 3 **A.** Just because I --
 4 **Q.** Because they were good people?
 5 **A.** They were good people.
 6 **Q.** Is that what it amounts to?
 7 **A.** But more to the point, I think the approach that
 8 we had to everything was one of problem
 9 solution. So if this had come up at that stage,
 10 at any stage, but what I would consider to be
 11 an early stage, what we would have wanted to do
 12 is to get into the problem, understand it and
 13 see whether there was something we could do to
 14 remedy it, to remediate the situation.
 15 **Q.** To whom did you report as Head of Security?
 16 **A.** So initially, when I joined Post Office Network
 17 I was reporting to Alan Barrie, who was the
 18 Operations Director. When Alan left,
 19 I reported -- and the business was
 20 substantially -- the shape of the business was
 21 substantially changed, I reported to David
 22 Miller who was the Chief Operating Officer.
 23 After that, I reported -- there was another
 24 restructure within Dave's team and I reported to
 25 a gentleman called Byron Roberts. We had just
 39

1 it's a question I've asked and haven't had
 2 an answer to, and it doesn't change the nature
 3 of the issue but I don't know how many of the
 4 prosecutions that have been properly quashed
 5 actually resulted from investigations in the
 6 time that I --
 7 **Q.** It's in double figures.
 8 **A.** Pardon?
 9 **Q.** It's in double figures.
 10 **A.** It's only because I had not been able to get
 11 that information up to now.
 12 Clearly, what went wrong was that, at some
 13 point in time, somewhere within ICL Pathway or
 14 Fujitsu or Post Office Limited, or more than one
 15 of those entities, people were aware that there
 16 was something amiss with the system and they did
 17 not make that fact known sufficiently widely
 18 that it became known to me or to any of the
 19 people in my team who were obtaining this data
 20 as evidence and submitting it to court.
 21 I do not believe that anybody working within
 22 my team, in the period 1999 to 2006, knowingly
 23 submitted evidence that was unsustainable or
 24 questionable or, you know, where there was any
 25 suspicion that it was not accurate, knowingly,
 38

1 taken over responsibility for cash handling from
 2 the Cash in Transit Network and Byron was the
 3 Managing Director of that, and that was the area
 4 where we felt security needed the most focus at
 5 that point. And then relatively briefly before
 6 I left, I reported to a chap called Ric Francis,
 7 who was, I believe, another Operations Director.
 8 **Q.** So you reported always to a board director?
 9 **A.** So I reported always to -- not a board, but to
 10 an Executive Team member, that's right, yes.
 11 **Q.** Did you attend board meetings?
 12 **A.** No. I -- certainly not regularly -- I believe
 13 that I had attended one or two board meetings.
 14 I had a very large programme called ISIS,
 15 Improving Security in Suboffices, which was
 16 spending around £30 million over a period of
 17 years and I had to account for that on an annual
 18 basis, but that, from memory, was probably the
 19 only time I went to the board.
 20 **Q.** Does it follow that you never reported to the
 21 board in your seven years about the
 22 investigation of subpostmasters and counter
 23 clerks?
 24 **A.** I don't recollect doing that. If you're going
 25 to bring up a document that says I did, I won't
 40

1 dispute it, but I don't recollect going to the
 2 Board of Post Office Limited with that,
 3 obviously the operations team and, from time to
 4 time, the Executive Team.
 5 I was -- I and my team were responsible for
 6 another very significant change in the nature of
 7 post offices, sub and Crown, when we established
 8 a programme to take the screens out and to move
 9 the screenless working, and that was something
 10 which I had to pilot through with the Executive
 11 Team on a number of occasions. But I reported,
 12 I wrote an annual report, I believe, that used
 13 to give details of the level of prosecutions
 14 that had taken place, but I don't believe that
 15 I ever needed to stand up and give any
 16 significant detail about that.
 17 **Q.** Okay, can we turn to some of the detail now,
 18 then, please. Can we turn up page 2 of your
 19 witness statement, please, and it's paragraph 3.
 20 It's the bottom part of the page, please. Do
 21 you see at the bottom part of the page, on the
 22 right-hand side, it says, "I was responsible for
 23 the work of a team of"?
 24 **A.** Yes.
 25 **Q.** You're here speaking about your role as Head of
 41

1 Office was a -- the Post Office Investigation
 2 Division was a statutory non-police law
 3 enforcement agency.
 4 **A.** Yeah.
 5 **Q.** Which statute established the Post Office
 6 Investigation Division as a statutory law
 7 enforcement --
 8 **A.** It's a form of words that has always stuck in my
 9 mind, so I'm merely repeating to you a form of
 10 words that I know within the files of the Group
 11 Security Director, of whom I was one. There was
 12 a circular -- sorry, there was a minute, a memo
 13 or a letter from the Home Office back in the
 14 early 1980s that said this. And it certainly
 15 isn't the case any longer and, gradually, over
 16 the years that I was Group Security Director, as
 17 Royal Mail moved towards and then was
 18 privatised, a lot of these powers and
 19 authorities that we had were removed.
 20 But at that point in time, when I was in
 21 Post Office Limited, as far as we were aware,
 22 the Home Office recognised our investigators.
 23 And, for example, there was --
 24 **Q.** Hold on. What do you mean, they "recognised"
 25 them?
 43

1 Security and you say:
 2 "I was responsible for the work of a team of
 3 Home Office recognised investigators and for
 4 ensuring their compliance with standards for
 5 operating that complied with relevant laws and
 6 regulations and with policies and standards set
 7 by the Post Office", et cetera, et cetera.
 8 **A.** Yes.
 9 **Q.** You say here that the members of your team were
 10 Home Office-recognised investigators. What did
 11 the Home Office recognise in the investigators?
 12 **A.** Well, I go back in saying this to a document
 13 that I had in my possession when I was the Group
 14 Security Director in Royal Mail, several years
 15 later, from the early 1980s, when the Home
 16 Office, in response to a question in Parliament,
 17 had answered that the Post Office Investigation
 18 Department, as it was, is a statutory non-police
 19 law enforcement agency, and, subsequent to that
 20 in a number of pieces of legislation, the Post
 21 Office was recognised as one of the agencies,
 22 for example, that had access to the Police
 23 National Computer or that certain powers
 24 accorded to it in terms of acquisition of data.
 25 **Q.** Just stopping there. You said that the Post
 42

1 **A.** I was just going to say, one of the ways in
 2 which they recognised it was that there was
 3 a Home Office circular in custody suites which
 4 advised custody officers that Post Office
 5 investigators had right of access to custody
 6 suites in the circumstances where a person that
 7 they were investigating had been arrested.
 8 **Q.** Okay, so you could get into custody suites.
 9 Anything else?
 10 **A.** No -- it's a term that for me stemmed -- and we
 11 had used many times -- that stemmed from this
 12 notification from the Home Office in the early
 13 1980s.
 14 **Q.** But you've included it because it makes you
 15 sound professional, doesn't it?
 16 **A.** I've included it because it was the way in which
 17 we viewed ourselves.
 18 **Q.** As professional?
 19 **A.** I believe we were professional, yes.
 20 **Q.** What does it actually mean? What does "Home
 21 Office-recognised investigators" actually mean?
 22 **A.** I suppose it really means anything at all
 23 because anybody can bring a private prosecution,
 24 and that was what the Post Office did. It
 25 brought private prosecutions. But, as I say,
 44

1 because we had, amongst other things, two-way
 2 access to the Police National Computer, so we
 3 input data to the Police National Computer and
 4 we were allowed to gather data from the Police
 5 National Computer, because as the Interception
 6 of Communications Act and other Acts were
 7 brought in -- and, sorry, the Regulation of
 8 Investigatory Powers Act -- we were allowed to
 9 acquire certain communications data.

10 Because we were controlled, we were
 11 essentially required to apply the principles of
 12 the Regulation of Investigatory Powers Act when
 13 conducting surveillance, so we accepted all of
 14 the requirements, the onerous requirements, if
 15 you will, of being professional investigators,
 16 we viewed ourselves in those terms.

17 **Q.** But we shouldn't read from this that the Home
 18 Office set a syllabus that was followed by
 19 examination, that was followed by a certificate,
 20 that there was a process of renewal or refresher
 21 recognition, that there were different levels of
 22 recognition, anything like that?

23 **A.** No, and I wasn't trying to suggest that, no.

24 **Q.** Can we turn, please, to LCAS0000124. You'll see
 25 this is a document entitled, "A brief History of

1 **Q.** Yeah, the copyright notice doesn't contain
 2 a date.

3 **A.** Sorry. Well, in that case, it would be midway,
 4 I would have thought, between 2008 and 2017.

5 **Q.** Can we turn to page 5, please, and look at the
 6 second paragraph, the one beginning "In 1908".
 7 You say:

8 "In 1908 the unit once again changed the
 9 name to the Investigation Branch, usually
 10 shortened to The IB. In 1934 the General Post
 11 Office underwent a radical reorganisation and in
 12 1935 the Investigation Branch became one of the
 13 administrative departments of the new
 14 Headquarters structure of the GPO. In 1967 the
 15 Investigation Branch became known as the
 16 Investigation Division and shortly after this,
 17 as the Post Office Investigation Department or
 18 POID."

19 Then you say this:

20 "POID's staff of civilian detectives were
 21 deployed with the approval of Parliament, the
 22 Home Office and the Courts."

23 What Parliamentary approval was there of the
 24 deployment of civilian detectives?

25 **A.** Well, as I say, the Home Office document that

1 Investigations, Prosecutions and Security in
 2 Royal Mail".

3 **A.** Indeed.

4 **Q.** I think you co-authored this?

5 **A.** I did. I pulled this together from data from --
 6 or information from within Royal Mail, the Post
 7 Office, and also with considerable assistance
 8 from a gentleman called Alan Baxter, who had
 9 been a senior officer in POID and was
 10 researching the history of investigations,
 11 prosecutions and security in Royal Mail after he
 12 retired. And this was produced, actually, as
 13 a second document in answer to a Freedom of
 14 Information Act Request, which asked just that
 15 question. I had produced an earlier document in
 16 which Alan Baxter, who had read it on a website,
 17 had said there were some inaccuracies and he had
 18 assisted me by giving me the information to
 19 produce this.

20 **Q.** When was it produced?

21 **A.** During the -- if you go to the bottom there is
 22 a copyright certificate and I think that
 23 probably gives the date but it was during the
 24 time that I was the Group Security Director, so
 25 at some point between 2008 and 2017.

1 I mentioned to you earlier, came about because
 2 somebody, a member of the Government, had
 3 answered a question in the early 1980s, which
 4 was written into Hansard, that essentially
 5 described the Post Office Investigation
 6 Department or Division, as a statutory
 7 non-police law enforcement agency.

8 So in that sense, we were known to
 9 Parliament and we were certainly known to the
 10 Home Office and, obviously, because we
 11 prosecuted regularly and it was Post Office and
 12 Royal Mail lawyers who prosecuted, we were known
 13 to the courts.

14 **Q.** You say that staff of civilian detectives are
 15 deployed with the approval of the courts. Which
 16 court gave approval?

17 **A.** I'm sorry, all I can say is that when I stood up
 18 as an investigation officer and gave evidence to
 19 the court, that evidence was accepted and the
 20 same thing applied year on year over the time
 21 that I was responsible for investigation teams.
 22 So I'm not quite sure how a court would give
 23 formal approval, other than in accepting the
 24 investigator as a person qualified to give
 25 evidence, as we did, in support of our

1 prosecutions.
 2 **Q.** Can we go to page 8 of your witness statement,
 3 please. Paragraph 13. You say in paragraph 13:
 4 "I have been asked 'Please explain why Royal
 5 Mail Group Limited (before the separation of the
 6 Post Office) and later POL (after the
 7 separation) had a practice of bringing private
 8 prosecutions against its agents/staff where they
 9 were suspected of financial crime, rather than
 10 referring matters to the police [and the] CPS."

11 Then you're referred, for your assistance to
 12 that document. If we scroll down the page,
 13 please, about six lines from the bottom, you
 14 say:

15 "In essence the answer is that since the
 16 mid-17th century, the General Post Office and
 17 all of its successors had resourced and managed
 18 the investigation and prosecution of offences
 19 and offenders against its businesses and people.
 20 The knowledge and expertise within the
 21 investigation teams was valued by the Post
 22 Office and Royal Mail businesses and there was
 23 a belief that the existence of the investigation
 24 function had a strong deterrent effect, reducing
 25 the likelihood of the commission of crime by

1 about the job I did, and particularly the
 2 investigative and prosecutorial side of it was
 3 that the vast, vast majority of our staff -- and
 4 that's, you know, employees, subpostmasters,
 5 agents, postmen, counter clerk, were honest,
 6 absolutely magnificent people. And, to be
 7 honest, even where we found there was
 8 dishonesty, again, in the vast majority of
 9 cases, there was usually significant mitigation
 10 that, you know, helped us to understand why this
 11 took place.

12 So no, I don't think there was any -- there
 13 certainly wasn't an increased concern. You
 14 know, we always wanted there to be as little
 15 crime and fraud within all of the business units
 16 of the Post Office and Royal Mail as possible.
 17 Many of the crimes that we investigated impacted
 18 directly on customers and there were ways in
 19 which some of the crimes committed by counter
 20 clerks and subpostmasters would have impacted
 21 upon individual customers and, obviously, the
 22 loss of funds through fraud -- and at all times,
 23 Post Office Limited funds were public funds --
 24 was to be avoided, you know, however possible.

25 And I know there's a lot of debate,

1 both employees and agents and by outside
 2 offenders."

3 So, in answer to the question "Why did Post
 4 Office act as a private investigator and
 5 prosecutor rather than referring cases to the
 6 police and the CPS", you give three answers:
 7 first, history --

8 **A.** Indeed.

9 **Q.** -- it had always been done that way; secondly,
 10 the knowledge and expertise which you say the
 11 investigations teams had was valued by the Post
 12 Office and RMG; and, third, that there was
 13 a belief that having this internal investigative
 14 and prosecutorial capacity had a deterrent
 15 effect on staff, ie it actually reduced the
 16 likelihood of them committing crime?

17 **A.** Absolutely. Yes.

18 **Q.** I want to explore that third one. Was it right
 19 that concern about staff, fraud and theft, was
 20 a heightened one and ran deeply within the
 21 senior management team and down from 1999
 22 onwards?

23 **A.** No. I would not say it was heightened. I mean,
 24 one of the phrases with which I prefaced then,
 25 and even since retirement, anything I ever said

1 potentially, about whether prosecution is
 2 an effective deterrent, and I'm not entirely
 3 convinced myself, but it was a process that
 4 we -- you know, that I had inherited and it was
 5 something that I was inducted into when I joined
 6 the Investigation Department, POID, and
 7 a process that we all felt certainly contributed
 8 to the overall security of the Post Office and
 9 its assets and customer assets over the years.

10 Sorry, that's rather wordy but that's to try
 11 to get that sort of the logic there behind it
 12 across to you.

13 **Q.** That document can come down. Thank you. Did
 14 you know that during the procurement and
 15 development of the Horizon IT System, it was
 16 made clear by the Post Office that one of the
 17 key objectives was the reduction of fraud, theft
 18 and false accounting by its staff?

19 **A.** I suspect that I knew that. Obviously, the
 20 procurement of the system took place long before
 21 I moved into Post Office Limited. I mean, I can
 22 remember having that discussion with people and
 23 pointing out that something that automated
 24 processes that, you know, essentially automated
 25 much the same processes that were being used on

1 paper wasn't likely to make any significant
2 changes to the level of -- to the fundamental
3 level of criminality. It might, if it gave us
4 access to more data, more information, it might
5 have improved the speed with which investigators
6 could respond. And I think, you know,
7 obviously, when I also became responsible for
8 the audit team, it may have given access to more
9 information for the auditors.

10 **Q.** Did you ever believe that, in order to ensure
11 the deterrent value of which you spoke in your
12 witness statement, the security team had to act
13 and had to be seen to be acting in a certain way
14 in its dealings with subpostmasters, namely by
15 acting firmly, harshly and uncompromisingly in
16 its dealings with them?

17 **A.** No. In fact, I would say literally the opposite
18 of that. I always found and I always taught --
19 I wasn't a trainer but I always told people that
20 the way you deal with anybody, whatever their
21 situation, whatever they are suspected of -- if
22 we're talking about suspects -- is fairly and
23 justly and certainly not firmly or robustly.

24 I don't think that ever helped anybody. And
25 it's not a behaviour type that I would have

53

1 distressing experience. That goes without
2 saying. I think after the event, some people
3 perhaps, you know, carried a slightly different
4 perspective to what actually happened.

5 Sorry, I could go on, but yeah.

6 **Q.** When you were Head of Security, did you
7 consciously understand -- and by that I mean
8 positively and deliberately recognise -- that
9 the Post Office was unusual, in that it was the
10 alleged victim of crimes that it was
11 investigating, it investigated such suspected
12 crimes itself and then it decided whether to
13 prosecute such suspected crimes itself?

14 **A.** I very much did. I understood that and always,
15 personally and with those working for me, tried
16 to make it clear that, you know, that we must
17 not take on a mantle of judge, jury and
18 executioner. We had a single role and that was
19 to gather all the available evidence,
20 positive -- or in support of the suspicions that
21 we held, against those suspicions and, as I said
22 before, in mitigation, and it was our job then
23 to pass those on to a function which I always
24 felt kept itself properly independent of the
25 investigation function, the criminal law team in

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1 wished to hear about or tolerated.

2 **Q.** Did you ever hear amongst the subpostmaster
3 community a view expressed that the Security
4 Team enjoyed the reputation of being harsh and
5 uncompromising.

6 **A.** I used to meet regularly with the National
7 Federation of SubPostmasters, and particularly
8 with Colin Baker and John Peberdy, both of whom
9 I think have been your witnesses, and this was
10 a view that Colin Baker and John Peberdy would
11 regularly express to me and I would regularly
12 challenge it and we would regularly discuss and
13 I was absolutely clear that, if they ever came
14 to me with the a specific case where someone
15 could demonstrate that something untoward had
16 happened, perhaps outside of the interview or
17 something like that, that I would take action
18 against it. That information was never brought
19 to me.

20 So it was a regular thing. And, I have to
21 say, from my own experience as an investigator,
22 it can never be pleasant to be a person
23 suspected of a crime, whether you've committed
24 that crime or not and no matter how kindly the
25 investigator treats you, it's still a very, very

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1 the Legal Services Department, to advise, and
2 then, throughout my career, decisions on
3 prosecutions, in any of the teams for which
4 I was responsible, were made by the line
5 management of the people suspected --

6 **Q.** They are also Post Office people, aren't they?

7 **A.** They are also Post Office people. That is true.
8 I mean, you couldn't go -- you know, with the
9 structure that we had and the approach that we
10 had, everybody was within the Post Office. That
11 is true.

12 **Q.** So you've used the idiom "judge, jury and
13 executioner"?

14 **A.** Yeah.

15 **Q.** You presumably understood at the time that our
16 legal system is designed, certainly the criminal
17 justice part of it, is designed to distribute
18 power among a wide range of authorities, and it
19 is unusual to have a single judge, jury and
20 executioner?

21 **A.** It is unusual to have a single organisation
22 which investigates and prosecutes, that's true.
23 Yes, I mean, the CPS was set up to take that
24 closeness away from the police and,
25 subsequently, Her Majesty's Revenue and Customs

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1 also letters their authority to prosecute, you
 2 know, and there are some very small
 3 organisations which still do it, like the RSPCA.
 4 **Q.** Was that widely recognised, the unusual nature
 5 of being victim, investigator and prosecutor,
 6 within the security team?
 7 **A.** I hope it was.
 8 **Q.** No, was it?
 9 **A.** It was by me and that was a position
 10 I promulgated so I wanted everybody to
 11 understand that it was an unusual situation and,
 12 for that reason and because of the potential for
 13 scrutiny -- I never envisaged something like
 14 this, but because of the potential of scrutiny,
 15 by, for example, the Court of Appeal, it was
 16 very important that we make every effort to
 17 ensure that we were, and could demonstrate
 18 visibly that we were, as independent -- that the
 19 separate elements of the investigation and
 20 prosecution process were as independent from
 21 each other as they reasonably could be.
 22 **Q.** Was it, to your knowledge, ie this unusual
 23 status of victim, investigator and prosecutor,
 24 recognised amongst senior executives within the
 25 Post Office?

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1 account of it being simultaneously victim,
 2 investigator and prosecutor.
 3 Firstly, to your knowledge, was that ever
 4 recognised, acknowledged, in any written policy
 5 document of Post Office Limited?
 6 **A.** Of Post Office? I don't know. I honestly
 7 couldn't say.
 8 **Q.** Is in a policy? We've looked at all of them --
 9 **A.** Yeah.
 10 **Q.** -- I can't see it.
 11 **A.** No, I --
 12 **Q.** "Front and centre, we are a victim, we are
 13 an investigator, we are a prosecutor. This
 14 creates risks. These are the risks that we need
 15 to be aware of and, therefore, these are the
 16 steps that we are taking to guard against them
 17 or to mitigate them."
 18 **A.** Yeah.
 19 **Q.** Was that ever done?
 20 **A.** As I say, I could always have articulated that
 21 fact. I don't recollect it being in a policy
 22 document that I generated, no.
 23 **Q.** Why not?
 24 **A.** I think, as I say, because I could -- well, let
 25 me also make a point here that, during the time

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1 **A.** Well, if I spoke to people about us, it was
 2 a fact I made known to them, so it would very
 3 much depend, I suppose, on whether they would
 4 have cause to have their ear bent by me at any
 5 point in time.
 6 **Q.** What about at board level, can you remember any
 7 discussions at board level about POL, the Post
 8 Office, holding this unusual status?
 9 **A.** Well, as I said, I never presented to the Board
 10 of Post Office Limited and it was only after my
 11 time at Post Office Limited that I became the
 12 Group Security Director and presented to the
 13 board. But it was certainly a matter that I
 14 went through, on the first occasion in 2008,
 15 probably 2009, that I presented my first group
 16 board report, that I ran through this sort of
 17 unique structure that we had, because there were
 18 some new non-exec directors who it was felt
 19 would benefit from that. But I'm talking about
 20 the Royal Mail Group and almost, by that time,
 21 separate from the Post Office.
 22 **Q.** I'm going to ask you, in general terms to start
 23 with, in a series of questions, what, if
 24 anything, was done by the Post Office in
 25 recognition of the risks that may arise on

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1 that I was the Head of Security for Post Office
 2 Limited, I didn't actually generate the policies
 3 by which Post Office Limited lived. We were
 4 a business unit within Consignia and then Royal
 5 Mail, and I deferred to my predecessor as Group
 6 Security Director, Andrew Wilson, on all matters
 7 of policy and to the policy team on matters of
 8 process and procedure. So, at the time, between
 9 1999 and 2006, that I was the Head of Security,
 10 all policy, process and procedure would come
 11 from the Royal Mail Group Security Team with
 12 considerable input from my team. So it wasn't
 13 being done to us, it was being done with us, but
 14 all of these documents were generated centrally.
 15 As far as possible, we lived by the policies
 16 that applied to all investigators across the
 17 whole of the group and, where there were
 18 specifics, then usually, within a policy
 19 document, it would make reference to specific
 20 circumstances they'd obtained for Post Office
 21 Limited.
 22 **Q.** Are you saying by that answer it's somebody
 23 else's fault?
 24 **A.** No, I'm not saying it's somebody else's fault.
 25 All I'm saying is that -- you asked me whether

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1 a policy was produced within Post Office
2 Limited. I'm just trying to explain. I didn't
3 generate policies within Post Office Limited
4 myself. But I and my team certainly contributed
5 to policies that were generated by the group
6 and, therefore, I am, you know, partly
7 responsible for the absence of that statement
8 within a policy produced for the whole group.

9 **Q.** Was this unusual position of victim,
10 investigator and prosecutor ever brought into
11 account in the formulation of the content of the
12 Post Office's written policies between 1999 and
13 2006, to your knowledge?

14 **A.** It was certainly in the mind of those who
15 drafted those policies. It may not have been
16 specifically referenced.

17 **MR BEER:** Thank you, sir. That would be
18 an appropriate moment, if it's convenient to
19 you, to take a break for 15 minutes until just
20 after -- in fact, until 11.50, sir.

21 **SIR WYN WILLIAMS:** Well, it is convenient but
22 there's something that's been playing in my mind
23 that I think I'd like to articulate now, in case
24 I forget to do it later on this morning or this
25 afternoon. Mr Marsh, Mr Beer asked you about
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1 that we felt was properly brought, then the
2 solicitor in Legal Services with the barrister
3 who had taken -- who had actually led the case
4 for us in court -- would produce a report that
5 would come back to the Head of Investigations,
6 and I don't recollect personally needing to go
7 through any of these reports, and I would have
8 done so if there were significant criticism of
9 the approach that Post Office Limited had taken
10 or of officers, of their behaviour, of the way
11 in which they comported themselves or the way in
12 which evidence had been gathered or presented.

13 I don't recollect that, sir. But we would
14 learn, as a point of principle, any acquittal,
15 the report on that acquittal would go to the
16 Head of Investigations and, if there were
17 learning -- if there were matters from which we
18 should learn, then I believe we would learn from
19 those.

20 **SIR WYN WILLIAMS:** All right. So really, there are
21 two possibilities that I need to think about.
22 One is: do those reports still exist? Well,
23 it's a long time ago, we might find it difficult
24 to find them, we'll have to see. But, secondly,
25 you -- can I be clear that you are clear that,
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1 30 minutes ago some questions about what turned
2 out to be wrongful convictions in the period
3 leading up to about 2006. He said -- and you
4 gave the answers, and I don't want to pursue
5 that with you. It's kind of a corollary of
6 that. The Inquiry is aware that in that same
7 period, say 2000 at the earliest, 2006 at the
8 latest, there were a small number of cases where
9 people were acquitted. All right?

10 **A.** Yes, sir.

11 **SIR WYN WILLIAMS:** What I wondered was, what steps
12 or processes were there in place to judge why
13 that had happened? Because, from your point of
14 view, and I don't mean your personal point of
15 view, I mean the Post Office point of view, that
16 was a case that had gone wrong, so to speak,
17 where you might have wanted to learn lessons
18 from it and it also related to this new computer
19 system. So can you tell me whether there was
20 any process in place to investigate cases where
21 people were actually acquitted?

22 When I say investigated, to look at the
23 reasons they had been acquitted, so far as you
24 could tell from the trial process.

25 **A.** Well, whenever there was an acquittal in a case
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1 at least at the time, documents should have
2 existed which would have looked into the reasons
3 for someone being acquitted?

4 **A.** Yes, sir. Certainly, I believe that in the
5 case -- in every case of an acquittal, there
6 would be a more detailed report provided by
7 counsel, who was leading for us, and possibly
8 added to by the Legal Services solicitor, and
9 that would be made known to the investigator and
10 to the Head of Investigation and particularly to
11 the Head of Investigation if there were any
12 criticism of the Post Office or of any witness
13 for the Post Office.

14 **SIR WYN WILLIAMS:** So would I be right in thinking
15 that it must follow from that that, if in those
16 early days, the defendant in the particular case
17 had raised as his or her defence, "I didn't do
18 anything wrong, it must have been the computer",
19 that would have been reported to the Post Office
20 and they would have known that that was the
21 basis of the defence?

22 **A.** I am sure that would have been the case, sir,
23 yes.

24 **SIR WYN WILLIAMS:** When I say "reported to Post
25 Office", I don't just mean that the individual
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1 people involved in the case would know of it, it
 2 would have or should have gone up the chain.
 3 **A.** Absolutely, sir. As I said earlier in my
 4 evidence, in the event that we had been made
 5 aware of any sustainable suspicions about the
 6 quality of the evidence coming out to the
 7 system, I would have -- I've no doubt that the
 8 first thing that we would have done would have
 9 been to go back to the programme team, and to
 10 ICL Pathway or Fujitsu, to understand exactly
 11 I what was going wrong and, as far as I am
 12 aware, that was not the case between 2000 and
 13 2006, sir.

14 **SIR WYN WILLIAMS:** All right, thank you very much.
 15 Sorry to prolong the session.

16 Do we need a further five minutes, Mr Beer?

17 **MR BEER:** Yes, please, maybe 11.55, sir.

18 **SIR WYN WILLIAMS:** Okay, fine.

19 **MR BEER:** Thank you.

20 (11.37 am)

21 (A short break)

22 (11.56 am)

23 **MR BEER:** Sir, good morning still, just. Can you
 24 see and hear us?

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

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1 Committee?

2 **A.** It was the committee of all of the Heads of
 3 Security for the various businesses. So
 4 I wasn't on that committee at that time. But it
 5 would have had the Head of Security for Royal
 6 Mail, Head of Security for Post Office Counters
 7 POCL Limited, head of Security for Parcelforce
 8 and one or two others on it.

9 **Q.** Was Revenue Protection represented on it
 10 separately?

11 **A.** I don't recollect being on it. Sorry, when
 12 I said I worked directly to Andrew, I didn't.
 13 I worked, actually, directly to the Operations,
 14 Head of Operations in the Group Security team so
 15 I was one below that committee at that time.

16 **Q.** "Within Royal Mail [it continues], Directors
 17 Personnel Network has also endorsed it and it is
 18 now submitted to become Post Office policy."

19 **A.** Yeah.

20 **Q.** What does that mean "Directors Personnel
 21 Network"?

22 **A.** Well, there were Directors of Personnel for
 23 various parts of Royal Mail, for territories,
 24 which is what Royal Mail had, for regions and --
 25 which is what Post Office Counters Limited had,

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1 **MR BEER:** Thank you very much.

2 Mr Marsh, can we look, please, at
 3 POL00030659. This is a document entitled "Post
 4 Office Internal Prosecution Policy
 5 (Dishonesty)". If we go to the last page of it,
 6 which is page 4, and scroll down, please, we can
 7 see that it is written by or signed off by
 8 Andrew Wilson, who you mentioned earlier.

9 **A.** Yeah.

10 **Q.** It's dated December 1997, so I think at this
 11 time you would have been working in or heading
 12 the Revenue Protection team?

13 **A.** That's right and working directly to Andrew
 14 Wilson, yes.

15 **Q.** So is this a policy of which you would have been
 16 familiar at the time?

17 **A.** Yes.

18 **Q.** If we go back to page 1, please. It says:

19 "This paper proposes a rationale for a Post
 20 Office prosecution policy as it applies to its
 21 own employees and agents. It's been endorsed by
 22 the Group Security Committee which includes
 23 security representatives from all businesses and
 24 the Legal Services Department."

25 Can you help us, what was the Group Security

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1 for Parcelforce, and they had a network where
 2 they all met.

3 **Q.** Moving to paragraph 2, "Current Policy":

4 "There is no single statement of current
 5 policy ..."

6 Just stopping there, does that accord with
 7 your recollection that this would have been the
 8 first time that a Post Office prosecution policy
 9 for its own staff had been reduced to writing?

10 **A.** Reduced to a single set of pages, as it were,
 11 yes. I imagine so.

12 **Q.** It continues:

13 "... but it can be summed up as normally to
 14 prosecute all breaches of the criminal law by
 15 employees which affect the Post Office and which
 16 involve dishonesty."

17 The way that's written involves
 18 a presumption, doesn't it, that a criminal
 19 offence actually has been committed and has been
 20 committed by the employee concerned? It doesn't
 21 speak in terms of an alleged offender or
 22 a suspect or?

23 **A.** No, it doesn't, you're right.

24 **Q.** Is it right that, at that time, end of 1997 --

25 I'll ask it in a different way. What was the

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1 stimulus for a policy, given that the Post
 2 Office had been prosecuting for hundreds of
 3 years?
 4 **A.** Essentially, I think we were trying to become
 5 more structured and organised in everything that
 6 we did. So across the whole of what was then
 7 the Post Office, we were trying to understand
 8 what happened, why things happened, whether they
 9 should continue to happen and what the policy
 10 should be. I've mentioned in one of my notes,
 11 feeding back to the Inquiry, that within the
 12 Post Office/Royal Mail/Consignia, et cetera, we
 13 were developing a structure of documents,
 14 a hierarchy of documents that ran policy,
 15 process, procedure, where policy was
 16 a relatively short document that would
 17 articulate an overarching aim or objective, the
 18 process was essentially on a business-wide basis
 19 how things would happen, and the procedure were
 20 the sorts of things that would happen, you know,
 21 on the frontline, so how postmen would work, so
 22 counter clerks would work and, indeed, how
 23 investigators would work.

24 And this is a part of that massive shift
 25 within the business to become more businesslike,

1 Did that reflect, to your mind, the
 2 prosecution policy that existed in 1997?
 3 **A.** Well, I mean it did but, obviously, the -- I'm
 4 not sure if the Code for Crown Prosecutors --
 5 yes, the Code for Crown Prosecutors was in place
 6 then.
 7 **Q.** Very much so.
 8 **A.** Yes, exactly. So I mean point (iv) really could
 9 have been worded much more simply to say that
 10 the Legal Services Department, as public
 11 prosecutors, have a responsibility to apply the
 12 code and the full test, and that will help to
 13 decide whether a prosecution should proceed or
 14 not. So, but, yes, I mean, essentially that's
 15 the policy as I would understand it at the time.

16 **Q.** Then it continues:
 17 "Legal Services Department provide advice in
 18 each case as to whether or not a prosecution is
 19 merited, taking account of the factors set out
 20 above."

21 Does that reflect the fact that, to your
 22 knowledge, it was the function of the Legal
 23 Services Department to advise on what might be
 24 described as public interest factors because
 25 that's what from (i), (ii) and (iii) are --

1 less like a government department and more like
 2 a business, and understanding all the things we
 3 did and, in so doing, probably ask the question:
 4 should we do so? So I think the Security --
 5 Group Security Committee would have asked is
 6 this the right thing to do and should we
 7 continue to do so? And, undoubtedly, more --
 8 well, with more remove and objectivity, the
 9 Directors Personnel Network would have asked the
 10 same question.

11 **Q.** It continues that there are exceptions to this
 12 presumption of prosecution for:

13 "i. Minor instances of wilful delay,
 14 ie a small number of items for less than
 15 24 hours.

16 "ii. Relatively minor, out of character
 17 actions by long serving police of good
 18 reputation committed during periods of intense
 19 personal stress.

20 "iii. Relatively minor cases which would
 21 expose the Post Office to embarrassing public
 22 criticism.

23 "iv. Cases where Legal Services Department
 24 advise that the prosecution is unlikely to
 25 succeed."

1 **A.** Yeah.

2 **Q.** -- in very broad terms, as well as providing
 3 advice on evidential prospects of success?

4 **A.** I think, yeah, but, to be absolutely clear, it
 5 was absolutely the duty of Legal Services to
 6 provide advice on the appropriateness -- well,
 7 of the likelihood of the prosecution succeeding,
 8 and to give their advice on public interest, and
 9 if their advice is that it would not be in the
 10 public interest, I would have been extremely
 11 surprised if anybody would have attempted to
 12 continue and to proceed to prosecution.

13 But the line manager who made the ultimate
 14 decision was a second back stop, if you will, on
 15 the public interest and business interest issue.
 16 So, you know, it wasn't -- it was Legal Services
 17 with another person, who was as remote from and
 18 objective as it is possible to be, within
 19 a single organisation to make that decision.

20 **Q.** Continuing to paragraph 3, scrolling down. "The
 21 Case for Prosecution", and this, so we know what
 22 it is, appears to be a discussion as to the
 23 reasons why the Post Office should retain its
 24 prosecutorial function.

25 **A.** Yeah.

1 **Q.** "The Post Office's prosecution policy appears to
2 have evolved over a considerable period of time
3 with little formal evaluation or review. Given
4 there is no formal rationale, the principles
5 underlying prosecution have been identified as
6 follows:

7 "To act as a deterrent.

8 "To serve the public interest.

9 "Neither of these can be accurately
10 evaluated, although they cannot be disregarded in
11 a review of this nature. There can be no doubt
12 that prosecution can be a deterrent, but only if
13 potential offenders believe that they will be
14 caught. Equally, in some instances, loss of
15 a job might be seen as a greater deterrent than
16 prosecution, particularly if prosecution is not
17 thought likely to lead to particularly serious
18 consequences (eg bound over or community
19 service). Ultimately, individual mindsets and
20 circumstances are the key to prosecution having
21 a deterrent effect. In the area of
22 prosecutions, serving the public interest is
23 an even more nebulous notion, although not one
24 which can be disregarded. It is still the case
25 that courts take certain crimes by Post Office

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1 that required to achieve dismissal, the need to
2 retain or hire lawyers to effect prosecutions
3 and the need for investigators to attend court
4 to give evidence.

5 "In general terms, the publicity around
6 crime in the Post Office, even if the report
7 concerns the successful apprehension of the
8 offenders, represents adverse publicity. While
9 it might be argued that it is better to be seen
10 to be doing something about internal crime, the
11 evidence indicates that most customers do not
12 perceive it as an issue until it is reported.

13 "The adverse effect on [industrial
14 relations] is caused by what is frequently
15 perceived as an over vigorous reaction to issues
16 such as wilful delay. Although rarely
17 a flashpoint in itself, it contributes to
18 a background feeling of resentment."

19 You will see this discussion of the case for
20 and against prosecution doesn't contain any
21 recognition of the fact that risks arise by
22 reason of an organisation being victim,
23 investigator and prosecutor -- judge, jury and
24 executioner -- does it?

25 **A.** It doesn't, no.

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1 employees particularly seriously (eg theft of
2 mail) and judges and magistrates frequently
3 comment on the responsibility that our employees
4 bear and the breach of trust that is created by
5 theft. Although there is no formal definition
6 of 'the public interest', it seems reasonable to
7 assume that it requires the prosecution of
8 dishonest individuals of a criminal
9 disposition."

10 The author then continues to discuss the
11 case against prosecution:

12 "The case against prosecution is easier to
13 quantify than the case for, although this does
14 not necessarily make it more valid. The
15 negative side of prosecution can be summarised
16 as follows:

17 "Costs.

18 "Adverse publicity.

19 "Adverse IR ..."

20 Does that mean "industrial relations"?

21 **A.** It does.

22 **Q.** "... consequences.

23 "Costs are incurred through the need to
24 gather evidence to the standard required for
25 criminal prosecution, which is far higher than

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1 **Q.** You said earlier that you thought that was
2 widely recognised. Why wouldn't it be
3 recognised in a document like this, the very
4 purpose of which is to discuss the case for and
5 against prosecution?

6 **A.** I honestly couldn't say why it didn't go into
7 that document. I didn't write it. My thoughts
8 may have contributed at some point in time.
9 I knew Andrew well. But I don't know why that
10 specifically wouldn't have come up and, perhaps,
11 it was not considered as widely as an issue in
12 1997 as perhaps we would have done later and we
13 clearly are doing now.

14 **Q.** Plainly, now we are --

15 **A.** Yes.

16 **Q.** -- because we know what went wrong.

17 **A.** For obvious reasons, yes.

18 **Q.** I'm just trying to test what you said earlier,
19 that it was widely recognised that there were
20 risks in being victim, investigator, prosecutor,
21 and that steps were made to address them, to
22 mitigate them, to eliminate them?

23 **A.** I mean, all I can say is it was for me --

24 I understood, you know, why the structural
25 changes that came about with the Police and

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1 Criminal Evidence Act and the establishment of
 2 the Crown Prosecution Service, why they
 3 happened. People told me the stories of, you
 4 know, of the partiality of police prosecutors,
 5 and the reason why they'd been separated. So
 6 I personally was aware of that and it was
 7 something that I would discuss with people from
 8 time to time. But why it didn't appear in this
 9 document, I honestly can't say.
 10 **Q.** Foot of the page, please. Paragraph 5.
 11 "Proposed Rationale for Prosecution":
 12 "Work which has already been carried out
 13 into the profiling of internal offenders within
 14 Royal Mail enables a rationale for prosecution
 15 to be constructed which can inform policy
 16 development. In broad terms, offenders can be
 17 placed into one of three categories as follows:
 18 "Criminal.
 19 "Irresponsible.
 20 "Irrational."
 21 Then the policy goes on to try to explain
 22 that categorisation.
 23 What was the work that had been carried out
 24 into the profiling of offenders?
 25 **A.** I know that two people from the Investigation
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1 deemed to serve the public interest. Other
 2 wrongdoings will normally be dealt with via the
 3 discipline code."
 4 Again, the way that's written is it presumes
 5 that the person is guilty, doesn't it?
 6 **A.** I don't think it does. Could we scroll up to
 7 the beginning of that again?
 8 **Q.** Yes, we can look at both pages at the same time,
 9 I think.
 10 **A.** Right.
 11 **Q.** "The Post Office's policy is normally to
 12 prosecute those of its employees ... who commit
 13 acts of dishonesty."
 14 It presumes it's already established,
 15 doesn't it?
 16 **A.** I think the point about prosecution is that we
 17 are -- I mean, we would -- the person writing
 18 this document, and I would certainly know, that
 19 we are alleging that a person has committed
 20 a dishonest act and we are taking that person
 21 before a court, a Magistrates' or a Crown Court,
 22 who will ultimately decide that for us. So it
 23 honestly does not -- if the wording is clumsy,
 24 then the wording is clumsy. I do not believe
 25 that that gives any suggestion, certainly
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1 Department went and did masters in areas of
 2 criminal -- areas of research into criminality
 3 at about this time and I think one of them did
 4 do some work on offender profiling, the sort of
 5 thing that told us there was a risk between
 6 nought and six months and that another strange
 7 spike arose around about the five-year mark, in
 8 terms of employment. That was one thing that
 9 I remember came out of it.
 10 I'm not sure quite how detailed any other --
 11 quite what other details came out of that work
 12 but, as I say, that, as I recollect it, is
 13 something that took place. Two people were
 14 sponsored to do masters, one of whom I think
 15 looked at offender profiling.
 16 **Q.** At the foot of this page, the policy states:
 17 "From the above, it is possible to formulate
 18 a prosecution policy as follows.
 19 "The Post Office's policy is normally to
 20 prosecute those of its employees or agents who
 21 commit acts of dishonesty against the Post
 22 Office for the purpose of illegally acquiring
 23 Post Office property or assets, or the property
 24 or assets of Post Office customers and clients
 25 while in Post Office custody, where this is
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1 I don't think it would have been in Andrew
 2 Wilson's mind and it wouldn't be in my mind,
 3 that people are guilty before the court has
 4 found them guilty.
 5 **Q.** That's what I'm exploring.
 6 **A.** I know you are and that's what I think I can --
 7 if I can therefore make this absolutely clear,
 8 that was never a position that I held or
 9 adopted. We investigated. The evidence may
 10 well have appeared to us to be overwhelming and
 11 the lawyer in Legal Services who advised may
 12 well have said that there is a very strong
 13 possibility of conviction. All of these things
 14 would go to make us feel that the person is
 15 quite likely to have committed the acts, you
 16 know, with which we're charging them.
 17 But that's not our job. It is the job of
 18 the court to decide, or for the person to say to
 19 the court that they admit that they're guilty
 20 and, until that's happened, a person is
 21 a suspect and not guilty, not a criminal.
 22 I hope that helps.
 23 That is and always has been my own position
 24 and it is and always has been the position that
 25 I would expect people working for me to adopt.
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1 Q. I'm exploring whether that's reflected in any
 2 single document --
 3 A. I appreciate that, yes.
 4 Q. -- or whether, alternatively, the documents
 5 display a different mindset, namely
 6 a presumption of guilt.
 7 A. Okay.
 8 Q. Can we look, please, at paragraph 6 on the
 9 fourth page. Thank you. "The Prosecution
 10 Process:
 11 "In order to streamline the process and to
 12 facilitate a consistent approach, it is
 13 recommended that a single point within the
 14 Personnel Department of each Business Unit
 15 should make decisions on prosecutions, following
 16 advice from the Legal Services Department as to
 17 the likelihood of success and the potential for
 18 embarrassment to be caused to the Post Office."
 19 This policy suggests that there was to be
 20 a single decision-maker within each personnel
 21 department of a business unit, not essentially
 22 the line manager --
 23 A. Yeah.
 24 Q. -- of the individual concerned. Was that
 25 carried into practice?

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1 Post Office Limited in those areas, it might
 2 well have still been the HORN, the Head of
 3 Retail Network, the person above the Retail
 4 Network Manager, making the decisions. But
 5 there would have been one personnel unit
 6 ultimately for this region, which was one-third
 7 of the country.
 8 Q. So by this time, it was the policy that a human
 9 resources and HR professional within a personnel
 10 department would take the prosecutorial
 11 function?
 12 A. Honestly, without access to documents from that
 13 time --
 14 Q. We're looking at the document.
 15 A. Well, this is a policy document put together by
 16 the Group Security Director for Royal Mail or
 17 for Post Office Group, I think it was at the
 18 time, the group within the Post Office at the
 19 time. Whether that came -- it says it is
 20 recommended. Now, what I'm saying to you is
 21 I do recollect that that became an approach that
 22 was proposed and, you know, and welcomed
 23 certainly by some of the retail line managers
 24 who found it onerous to make those decisions.
 25 But I wouldn't say for sure whether that applied

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1 A. Yeah, to be fair, when I was talking to you
 2 about line manager, I'm probably talking more
 3 about the time when I was an investigator myself
 4 and my own direct experiences and, thinking
 5 about it, there probably -- increasingly, there
 6 was a single point of contact within a personnel
 7 department for a business unit that would make
 8 decisions.
 9 Q. What does "business unit" refer to?
 10 A. Well, at the time when Andrew wrote this, there
 11 would be about more than 20 of them. We'd gone
 12 through a restructuring and we were -- there
 13 were a great many business areas, but --
 14 Q. What about a subpostmaster in a village in East
 15 Anglia? What's their business unit?
 16 A. A subpostmaster in a village in East Anglia, by
 17 the time I was Head of Security in Post Office
 18 Limited, would have been part of the Eastern
 19 Region, and therefore within the Eastern Region
 20 there might either have been -- there might well
 21 have been one point -- I honestly couldn't say.
 22 There might well have been one point of contact,
 23 there might have been more than one point of
 24 contact because it was a very large area, or it
 25 might well have been that, in that area -- in

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1 across the whole of the Post Office Limited or
 2 indeed the whole of the Royal Mail Group.
 3 Q. Whoever the person was, did they receive any
 4 training, to your knowledge, on how to take
 5 prosecutorial decisions?
 6 A. Right. Given that I don't know who the person
 7 was and whether they actually existed, I don't
 8 know. But what I do know is that Legal Services
 9 did use to run training sessions for personnel
 10 managers so that they could understand the ambit
 11 of the decision that they were making or that
 12 perhaps others within their business unit were
 13 making and could, you know, assist people in
 14 understanding exactly what the requirements
 15 were.
 16 That said, within each advice, it was made
 17 clear exactly what decision was required.
 18 Q. It may have made clear what decision was
 19 required. I'm asking about whether training was
 20 given to the person who was to make the
 21 decision?
 22 A. As I say, I, from memory, Legal Services
 23 certainly did provide training to personnel
 24 units. So, probably, as we went forward in
 25 time, this process became more clearly defined

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1 and more consistent.

2 **Q.** Can we turn to POL00030578. Thank you. If we
3 see the title of this document is "SO2", what
4 does that refer to?

5 If you can't remember --

6 **A.** I'm just thinking. I think it's probably
7 "Security Operations 2" or something like that.
8 Or it's "S02", Security zero two policy.
9 I don't know for sure, though. As I said to
10 you, all of these policy documents were held
11 within a variety of different databases over the
12 years and they would have had serial numbers.

13 **Q.** "... Royal Mail Group Limited Criminal
14 Investigation and Prosecution Policy."
15 If we look at the foot of the page, please,
16 a bit further down, on this page and every page,
17 it's dated 1 December 2007.

18 **A.** Yes.

19 **Q.** This is at a time when you'd ceased to be Head
20 of Security?

21 **A.** That's correct. I would at this time have been
22 the General Manager Security for Royal Mail
23 Letters Operations.

24 **Q.** But if we look, please, at page 5 of the
25 document and look at box 9, under "Assurance

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1 existence with broadly the same details in it,
2 in 2005, a date when we definitely assured it.

3 **Q.** What does "assurance" mean, why are you listed
4 as an assuree or an assurer?

5 **A.** It means at a point when the document was in
6 draft it would have been sent to me, I would
7 have read it and, quite possibly, shared it with
8 senior members of my team who might be impacted,
9 got any feedback from them, send it back, and
10 then a final version would have been produced
11 that would either have had my feedback in it or
12 I would have been told why my feedback was not
13 going to go into it.

14 **Q.** To what extent did such assurance include
15 assessing whether the policy was in accordance
16 with applicable investigation and prosecution
17 standards of the day?

18 **A.** To be honest, I think we can be absolutely
19 confident about that because Ray Pratt, the
20 author, who I don't, to be honest -- it said
21 Head of Criminal Investigation, to be honest,
22 Ray Pratt was Head of Policy in Criminal
23 Investigations. If Ray Pratt had written it,
24 then we could be absolutely confident that it
25 was coherent with all the other documents

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1 Details", your name, along with some others with
2 whom we're familiar or are going to become
3 familiar, such as Mr Wilson and Mr Scott --

4 **A.** Yeah.

5 **Q.** -- appear. You'll see it then says, "Business
6 Unit, Royal Mail Group", and "Assurance Date,
7 October 2005". What does "Assurance Date" and
8 assurance date of October 2005 mean?

9 **A.** I'm guessing, not unlike a document that you
10 looked at with Mr Ferlinc yesterday, that what
11 it means is that somebody failed to update
12 a document. So I think, if this says
13 "Review" -- if this last updated
14 December 2007 -- I mean, unless the only thing
15 that has happened here is that exactly the same
16 wording has been put into a different format,
17 which is possible, in which case it wouldn't
18 have needed to come back to us, if there's been
19 any change in wording then that would be
20 an oversight and it would have come back round
21 to us.

22 **Q.** Do I take from that answer that this document is
23 a 2005 document, it's --

24 **A.** Well, no, this document is clearly a 2007
25 document. Clearly, there was a document in

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1 because it was -- one of the things he did and
2 did extremely well, was to ensure the coherency
3 of our full policy set across this area.

4 **Q.** I wasn't asking about coherence with other
5 documents; I was asking about whether assurance
6 was in accordance with the applicable
7 investigation and prosecution standards of the
8 day, ie the law of England and Wales?

9 **A.** Well, we would have formed part of that
10 assurance but to be fair, Rob G Wilson, as
11 you're aware, was the head of Legal Services at
12 that time. So that would have been a specific
13 area that he would have input on that the policy
14 was or was not in keeping -- in accordance with
15 relevant statutes and regulations on
16 prosecution.

17 **Q.** When a policy like this was written, was it ever
18 the practice of the Post Office to procure
19 external legal advice?

20 **A.** If that were the case, that would have happened
21 via Rob Wilson, yeah.

22 **Q.** Would it be reflected in the document?

23 **A.** I wouldn't have thought it would be reflected in
24 the document. I would have thought if you'd
25 been able to ask Ray Pratt around about that

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1 time, he would have had all of the feedback that
 2 he'd had, and it would probably have been
 3 reflected in that feedback.

4 **Q.** Can we just hold that policy in mind for
 5 a moment and look at paragraph 20 of your
 6 witness statement, which is on page 13, at the
 7 foot of the page, and you say:

8 "I have been asked what legislation,
 9 policies, guidance and/or principles governed
 10 the conduct of investigations by the Security
 11 team during the period I worked within it and
 12 how this changed over the period I held relevant
 13 roles within it?"

14 You say:

15 "I can say that the primary legislation that
 16 governed POL and indeed all of [Royal Mail
 17 Group's] approach to investigations was the
 18 Police and Criminal Evidence Act 1984, together
 19 with its various Codes of Practice. In addition
 20 surveillance and associated acquisition of data,
 21 which took place far less frequently in POL than
 22 in other parts of Royal Mail, was governed by
 23 the Regulation of Investigatory Power Act 2000,
 24 and aspects of the prosecutions brought by Post
 25 Office Limited and Royal Mail were subject to

1 parts that were relevant to the way in which we
 2 investigated and the way in which we
 3 interviewed, were the procedures that people had
 4 to follow because they were the law of the land
 5 and, you know, we could not override them. They
 6 would override anything else that we may wish to
 7 say or do.

8 **Q.** Let's just look at the policy, then. If we
 9 scroll down to the bottom half of the page under
 10 "Conduct of Investigations", if you scroll down
 11 a bit more. Thank you. 3.1.4, "Conduct of
 12 investigations":

13 "The conduct, course and progress of
 14 an investigation will be a matter for the
 15 investigators as long as it is within the law,
 16 rules and priorities of the business.
 17 Investigators will ultimately report to the
 18 Director of Security with regard to the conduct
 19 of criminal investigations."

20 This doesn't give any assistance at all to
 21 investigators, does it?

22 **A.** It's not designed to, literally not designed to.
 23 This document is a policy document aimed at the
 24 higher echelons of the Post Office/Royal Mail.
 25 So below this, as I've said to you, at that

1 the Criminal Procedures and Investigations Act
 2 1996. Following the development of the
 3 Financial Investigation Unit the Proceeds of
 4 Crime Act 2002 governed parts of the
 5 investigation of specific cases in which
 6 recovery of proceeds of crime were sought."

7 Stopping there, if we can go back to the
 8 policy, please, at POL00030578. Were the kinds
 9 of legislative and code-based instruments that
 10 you have mentioned in your paragraph 20 intended
 11 to be carried into effect through a policy such
 12 as this?

13 **A.** Through the processes and procedures that sat
 14 below a policy such as this. I think
 15 I explained to you, the point about the policy
 16 was to articulate at a very high level the aims
 17 and objectives of the organisation in a given
 18 area, and that's what this policy document seeks
 19 to do. Below this document, and sort of more
 20 accessible to investigators and others, would be
 21 the processes and then the procedures and, as
 22 I said in, I think, part of my feedback, the
 23 codes of practice for PACE -- for the Police and
 24 Criminal Evidence Act -- were essentially part
 25 of our procedures. Not all of them, but those

1 time, 2007, there would probably have been
 2 a Lotus Notes database on which there would have
 3 been a very significant number of process and
 4 procedural documents covering every aspect of
 5 investigations, and those would link to the
 6 training that people would have when they came
 7 in as investigators. So -- and, you know --

8 **Q.** All this says is that the conduct of
 9 investigators is a matter for the investigators.

10 **A.** The conduct, course and progress of
 11 investigation was just that, a matter for the
 12 investigator, provided it's within the law the
 13 rules and the priorities, and the law as we
 14 understand it, is PACE, CPIA and other laws.
 15 The rules were very much about the way in which
 16 people were treated and the rights of access to
 17 information, things like that, all of which
 18 would have been laid out as policy -- as process
 19 and procedure, and the current processes and
 20 procedure would have been trained to new
 21 entrants and would have been promulgated to
 22 serving investigators via a variety of different
 23 systems.

24 But, as I said to you, the circular process,
 25 the sending of circulars, initially physically

1 and, by this time by email, meant that people
2 were -- had a duty to bring themselves up to
3 date with any changes in the law or in process
4 or procedure. But each individual investigation
5 was different and you couldn't specify how
6 an investigation should be conducted.

7 **Q.** Can we go over the page, please, to 3.1.6.

8 "Prosecuting Criminals":

9 "This policy supports the Code of Business
10 Standards in normally prosecuting those who
11 commit theft or fraud and where appropriate
12 offences under the Postal Services Act 2000
13 Sections 83 and 84.

14 "Criminal investigations will be conducted
15 in accordance with the procedures and to the
16 standards required by legislation, case law and
17 the courts."

18 Again, looking at this paragraph,
19 "Prosecuting Criminals", the heading and text
20 underneath it rather assumes it has already been
21 established that the person suspected of
22 committing a crime is guilty of it, doesn't it?
23 They are a criminal?

24 **A.** I absolutely agree with you that it is
25 prosecuting suspects and the policy supports the

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1 committed. Your job was to investigate
2 suspected offences to work out whether
3 an offence had even been committed?
4 **A.** No, to be fair in the majority -- leaving
5 aside -- I suppose in many ways, yes,
6 specifically those cases that are relevant to
7 this Inquiry, that is right, because,
8 ultimately, it's been adjudged that the offences
9 haven't been committed or the evidence is unsafe
10 to support the convictions that took place. In
11 a great many cases that I was talking about in
12 the statement, it was perfectly clear that
13 an offence had been committed, that mail had
14 been stolen, you know, often stolen, torn apart,
15 discarded. You know, we had the evidence that
16 indicated that a crime had been committed. We
17 were looking for the person who had committed it
18 but there was no doubt that a crime had been
19 committed.

20 **Q.** Is what we've seen in these policy documents and
21 your witness statement here really revelation of
22 an attitude of mind held by you and others in
23 the security team: if there's a loss shown on
24 the system, the postmaster must be guilty of
25 theft, fraud or false accounting?

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1 code of business standards in normally
2 prosecuting those who are suspected of
3 committing theft or fraud. It is clumsy
4 language. I genuinely do not believe that the
5 language is indicative of a mindset.

6 **Q.** Can we look at paragraph 3 of your witness
7 statement, please, which is on page 2. You say:

8 "As an Investigation Officer in POID I was
9 responsible for undertaking investigations into
10 a range of theft and fraud crimes committed
11 against the Post Office by staff members ..."

12 You do the same thing there, don't you?

13 **A.** I do. But I think what I would say is I am
14 writing that statement at many years removed and
15 beyond that point in time. So, in essence,
16 I know that the people who were prosecuted and
17 convicted, you know, were adjudged by the court
18 to have committed those offences. But you're
19 right, I could have phrased that slightly
20 differently and said that I was responsible for
21 undertaking investigations into a range of
22 thefts and fraud acts and into those suspected
23 of committing them.

24 **Q.** It wasn't your job at all to investigate crimes
25 that had already been established to have been

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1 **A.** Well, no, can I be absolutely clear, that is not
2 the case at all. At no point in time would
3 I ever have said that. Subpostmasters lost
4 money all the time and, you know, in the vast
5 majority of cases, certainly, they were not
6 guilty themselves. So money could go missing --
7 you heard Martin Ferline yesterday describe some
8 of the sub post offices that, as
9 an investigator, I would have gone into years
10 before that his auditors went into. Some were
11 absolute examples of good practice. Others were
12 the opposite and, you know -- and in those
13 cases, often losses would occur because people
14 weren't applying the processes properly,
15 possibly they'd been taken advantage of by
16 members of their staff, possibly they'd been
17 taken advantage of by members of the public if
18 hatches had been left up or money had been
19 placed somehow where it could be taken without
20 anyone being aware of it.

21 So we were well aware that a loss frequently
22 was not a criminal act on the part of the
23 subpostmaster or anybody at the Post Office and
24 often was not a criminal act at all. It was
25 an act of -- you know, it was something that

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1 occurred as a result of perhaps poor application
2 of procedures. Clearly, at the time, we were
3 not aware that there was any possibility that
4 the system might also be causing losses but we
5 didn't approach losses on the basis that a crime
6 had already been committed. That was something
7 that we needed to establish.

8 **Q.** Can we turn to paragraph 24 of your witness
9 statement, please, which is on page 16. You
10 say, paragraph 24:

11 "I have been asked how RMG/Post Office
12 policy and practice regarding investigation and
13 prosecution of Crown Office employees differed
14 from the policy and practice regarding
15 investigation and prosecution of
16 [subpostmasters], if at all, and whether this
17 changed over the period of time that I held
18 relevant roles?"

19 You say:

20 "I would say that there was no significant
21 difference in policy or practice, in the
22 investigation or prosecution of suspects during
23 the time that I was Head of Security at POL.
24 The investigative processes differed slightly in
25 every case, whether employee or agent, but the

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1 that will make that point clear and I'm
2 certainly confident that the training that was
3 given to people upon their sort of initial
4 joining of the security team would have made
5 that point absolutely clear.

6 **Q.** You know that by this time, ie 1999 to 2006, the
7 code issued pursuant to the Criminal Procedure
8 and Investigations Act 1996, the CPIA code --

9 **A.** Yes.

10 **Q.** -- was in force provided, amongst other things,
11 that in conducting an investigation,
12 an investigator should pursue all reasonable
13 lines of enquiry, whether these point towards or
14 away from the suspect --

15 **A.** Yeah, absolutely.

16 **Q.** -- and that obligation was written into the code
17 from its very first iteration. It remained
18 there throughout the period that we're looking
19 at, do you agree?

20 **A.** I do but, as I say, this is a position that
21 I personally held and promulgated to my team
22 members from much earlier than that. So, you
23 know, it's a point of view that I have always
24 held.

25 **Q.** I'm asking, are you aware of any policy or

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1 ultimate aim was always to fully and fairly
2 investigate a suspected or alleged crime. The
3 principal objective would be to gather all
4 available evidence, whether in support of the
5 allegation, counter to it or in mitigation.
6 This would be key to enabling the relevant line
7 manager to make appropriate decisions on
8 discipline or contractual status", et cetera.

9 **A.** Yeah.

10 **Q.** That's something that you said earlier in your
11 evidence today: that the job of an investigator
12 was to secure and then to analyse evidence,
13 whether it pointed towards, in support of the
14 allegation, was contrary to the allegation or
15 might be a mitigation of the allegation, yes?

16 **A.** Yes.

17 **Q.** Are you aware of any policy documents where that
18 fair and balanced approach was written into
19 guidance to investigators?

20 **A.** Well, as I said, policy documents, documents
21 with the title "Policy" would not have had that
22 level of detail. I firmly believe that there
23 were process and procedure documents that have
24 not been made available to the Inquiry and,
25 therefore, haven't been made available to me

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1 procedure documents in which that was reflected?

2 **A.** I am saying to you I firmly believe that there
3 were such documents at a lower level within the
4 Royal Mail Group security compendium of
5 processes and procedures and, if we could see
6 those, we would be able to see that written in
7 there and, certainly, that it formed part of the
8 training that was given to new recruits, however
9 they came in to the teams.

10 Between '99 and 2006, if they were joining
11 my Post Office Limited team, they would have
12 been trained by the Royal Mail Group Security --
13 Group Security Training wing and, obviously,
14 that training wing then worked for me after
15 I left and became the Group Security Director.
16 But, you know, that would have formed part of
17 the training given, and certainly part of
18 training notes, and I firmly believe it would
19 have formed part of the process and procedure
20 documents that they would also have been
21 expected to comply with.

22 **Q.** Can we look at a document with which we have
23 recently been provided by the Post Office.
24 POL00038452. Thank you. You'll see this is
25 entitled "Post Office Limited Security

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1 Operations Team Compliance", it's got the Post
 2 Office emblem on the top-left side and the
 3 document is a "Guide to the Preparation and
 4 Layout of Investigation Red Label Case Files,
 5 Offender Reports and Discipline Reports".
 6 I think you mentioned offender reports earlier;
 7 is that right?
 8 **A.** Yes, yeah.
 9 **Q.** This document is undated and there's presently
 10 work under way to establish whether this
 11 document or the limits of the period in which
 12 this document and the suite of documents of
 13 which it formed a part was in operation?
 14 **A.** Well, I can tell you with confidence that it
 15 post-dates my time at Post Office Limited
 16 because Security Operations team wasn't a term
 17 that I used. And, in fact, we didn't generate
 18 our own documents that we badged Post Office
 19 Limited because, as I said, we were part of the
 20 Royal Mail Group security community so the
 21 documents on which we depended, in the main,
 22 were Royal Mail Group documents, so this is
 23 after 19 -- after 2006.
 24 **Q.** We've been told so far by the Post Office that
 25 it was in circulation from at least 2008, and

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1 detailed everything that the investigator had
 2 established surrounding the alleged offences,
 3 and about the suspect offender, and within it,
 4 it would make comments about security
 5 weaknesses, security procedural failings, other
 6 procedural failings, and it would make
 7 detailed -- well, it would make a detailed
 8 statement about the attitude of the suspect when
 9 they were interviewed, about any likely
 10 mitigation, and so on.

11 It was a full report, it was designed to go
 12 through the casework management team but
 13 straight to Legal Services, and Legal Services
 14 having taken -- and it was directed to them and,
 15 therefore, it was viewed as then having
 16 privilege, having legal privilege, being
 17 a report between the investigator and the
 18 lawyer. The discipline report was a subset of
 19 that information, and it wouldn't have things in
 20 it, such as security weaknesses, and so on.

21 And the discipline report was used at -- and
 22 was used in the discipline case with the
 23 suspect, particularly if the suspect was going
 24 to be dismissed or if their contract for
 25 services, as a subpostmaster had, was going to

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1 emails suggest that it was in circulation at
 2 least up until 2016.
 3 **A.** Mm-hm.
 4 **Q.** I just want to see whether any to the contents
 5 of it reflect practice earlier on or whether
 6 things have changed, as the Post Office evolved.
 7 Do you recognise the phrase "Red Label Case
 8 Files"?
 9 **A.** Absolutely, yeah, it's a very simple point.
 10 Any -- and you may well wish to take issue with
 11 the term "offender", "report and offender file"
 12 but those were the terms we used "suspect
 13 offender report" and "suspect offender file"
 14 might be a better term but any file --
 15 **Q.** You've anticipated where I'm going. It's
 16 another bit of language, isn't it?
 17 **A.** It is another bit of language but the red label
 18 was literally that. It said "urgent today" and
 19 it meant whenever it landed on your desk you
 20 dealt with a red label case before anything
 21 else, other than other red label cases.
 22 **Q.** Can you describe what an offender report and
 23 a discipline report were, in general terms,
 24 please?
 25 **A.** Yeah. An offender report was a full report

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1 be terminated and the report, the discipline
 2 report, would often be given to them. But it
 3 would be lacking certain information that was
 4 directed to the lawyer, who was advising on the
 5 potential prosecution.
 6 **Q.** That's what I want to ask you about in a moment.
 7 Just to get the distinction clear, offender
 8 report was confidential, was not going to get
 9 disclosed to the suspect?
 10 **A.** No.
 11 **Q.** It was badged up as enjoying legal professional
 12 privilege because it was being written to
 13 a lawyer for advice?
 14 **A.** Yes.
 15 **Q.** Suspect -- sorry, discipline report disclosed to
 16 the suspect?
 17 **A.** The discipline report would come out of the --
 18 of one of the appendices of the case file, these
 19 are like literally the physical stuff -- would
 20 come out of one of the appendices of the case
 21 file and would be sent to the relevant line
 22 manager and this was not to do with making
 23 a decision on prosecution; this was to do with
 24 making a decision on continued employment or
 25 continued contract for services.

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1 Q. If we go to page 3, please, we should probably
 2 go to the foot of page 2 first, just last line
 3 on the foot of page 2. Keep going down a little
 4 bit please. Thank you:
 5 "The aim of this document is to give
 6 guidance to Security Operations Managers and
 7 Team Leaders on the current compliance standards
 8 for the preparation of red label case offender
 9 reports and discipline reports."
 10 A. Yes.
 11 Q. Does that reflect the fact that there were
 12 compliance checks made by team leaders and
 13 managers?
 14 A. It reflects what I now understand was taking
 15 place in Post Office Limited after 1 or
 16 2 January 2007. I mean, let's be clear, there
 17 were -- essentially, the casework management
 18 team were a compliance or an assurance team.
 19 I used to think of them as assurance rather than
 20 compliance. Their aim was supportive and was to
 21 make sure that people understood what they
 22 should be doing and to make sure they were doing
 23 it to the best of their ability and, if they
 24 weren't, to support, counsel and mentor.
 25 Compliance I think, which is something which
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1 to page 4, we then see what the discipline
 2 report should include, yes?
 3 A. Yes.
 4 Q. At 2.14, just like we saw at 1.24, it says:
 5 "Details of failures in security,
 6 supervision, procedures and product integrity."
 7 That's contrary to what you said --
 8 A. That's contrary to what I said, yes. I'm sorry
 9 I thought that was something --
 10 Q. No, I think you'll be proved to be right when we
 11 look at the substance of the document.
 12 A. Right.
 13 Q. But, in any event, at least the template here,
 14 the outline, suggests that details of failures
 15 in, amongst other things, product integrity
 16 should be included in the discipline report.
 17 If we go over the page to page 5, please.
 18 This appears, would you agree, to be a template
 19 for --
 20 A. It's not dissimilar to the one that I was given
 21 in 1985 when I joined the POID. The format
 22 didn't change a great deal over the many years.
 23 I mean, it had been developed over many years
 24 and it was a good way of getting all the
 25 information necessary for everybody to make
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1 I have obviously been involved in a lot in Royal
 2 Mail over the years, is something a little bit
 3 harder edged, and that wasn't an approach within
 4 the team when I was there.
 5 Q. Can we look at the rest of this page, then. The
 6 contents of the offender report are set out
 7 under a series of subheadings. Under the
 8 subheading of preamble, it must have a header
 9 and footer. The preamble should be in
 10 accordance with the policy template. The
 11 correct heading must be included and then the
 12 offender report should have an investigation
 13 background.
 14 A. Yeah.
 15 Q. Then it should have details of the interview and
 16 then what happened post-interview; do you see
 17 that?
 18 A. Yeah.
 19 Q. If we scroll down to the bottom of the page, the
 20 contents list required, amongst other things,
 21 paragraph 1.24:
 22 "Details of failures in security,
 23 supervision, procedures and product integrity."
 24 Just hold that thought for the moment.
 25 We'll come back to it. If we go over the page
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1 their decisions in a structure that everybody
 2 would recognise.
 3 Q. It is essentially like a file front sheet?
 4 A. It's just that, yeah, or a report front sheet.
 5 Q. Yes, report front sheet. If we look at what
 6 should be included, name, rank, office, age,
 7 service, et cetera, and then, on the right-hand
 8 side "Identification Code: (Numbers 1 to 7
 9 only)". Again, if we just remember that for
 10 a little later on, please.
 11 If we scroll through the document, please.
 12 We'll see the other information that should be
 13 included and then carry on scrolling, please.
 14 Then it ends and we then get some guidance under
 15 "Investigation Background", which was, if you
 16 remember, one of the subheadings --
 17 A. Yes.
 18 Q. -- for the offender report. If we carry on
 19 scrolling, we see guidance about each of the
 20 subheadings --
 21 A. Yeah.
 22 Q. -- that should be included. Carry on scrolling,
 23 and keep scrolling, and keep scrolling, and
 24 scroll right up until we get to paragraph 1.24,
 25 which is at the top of page 10.
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1 I just want to spend a little time on this
2 before lunch because this is, I think, new for
3 the Inquiry and may be significant:

4 "Details of failures in security,
5 supervision, procedures and product integrity."

6 If we just read it together to start with:

7 "This must be a comprehensive list of all
8 identified failures in security, supervision,
9 procedures and product integrity it must be
10 highlighted [in] bold in the report. Where the
11 security manager concludes that there are no
12 failures in security, supervision, procedures
13 and product integrity a statement to this effect
14 should be made and highlighted in bold.

15 "The 'Procedural Failings' form ... should
16 also be completed within 48 hours and circulated
17 to relevant Stakeholders. One of the
18 Stakeholders is Crime Risk, who are responsible
19 for capturing emerging crime trends and/or
20 prevalent failings that contribute to fraud
21 within the business."

22 So this is saying, in the legally privileged
23 document, details of, amongst other things,
24 failures in product integrity, should be
25 included?

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1 criminal elements of the enquiry, as well as
2 being potentially damaging to the reputation or
3 security of the business. If you are in any
4 doubt as to the appropriateness of inclusion or
5 exclusion you must discuss with your Team
6 Leader."

7 Reading those paragraphs together, 1.24 and
8 now 2.15, do you see any particular problem with
9 them?

10 **A.** Well, I certainly do when it says, "Significant
11 failures that may affect the successful
12 likelihood of any criminal action". I mean that
13 is -- clearly, in the suspect offender report
14 which goes to the Legal Services, all of this
15 information must be disclosed. And although
16 this is a document which post-dates me and
17 relates to Post Office Limited, there was
18 a similar set of circumstances in Royal Mail
19 Group where there was caution -- they wanted
20 caution to be taken about just how much detail
21 was shared in the discipline report that went
22 directly to the offender about security
23 weaknesses, product weaknesses that might be
24 exploited much more widely by people in the
25 community, particularly those which we might not

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1 **A.** Yeah.

2 **Q.** Can we go forwards, please, to paragraph 2.15 on
3 the foot of page 12. This is under the heading
4 earlier on, the "Discipline Report" we're now
5 dealing with?

6 **A.** Yes.

7 **Q.** "Details of failures in security, supervision,
8 procedures and product integrity.

9 "This must be a comprehensive list of all
10 failures in security, supervision, procedures
11 and product integrity it must be highlighted
12 [in] bold in the report. Where the Security
13 Manager concludes that there are no failures
14 a statement to this effect should be made and
15 highlighted in bold."

16 Then over the page, please, top of the next
17 page:

18 "Significant failures that may affect the
19 successful likelihood of any criminal action
20 and/or cause significant damage to the business
21 must be confined, solely, to the confidential
22 offender report. Care must be exercised when
23 including failures within the Discipline Report
24 as obviously this is disclosed to the suspect
25 offender and may have ramifications on both the

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1 immediately be able to rectify.

2 So that's the logic there. I can see the
3 problem and, certainly, I don't think even in
4 this report there was an objective to prevent
5 these issues being taken into account when
6 considering whether to prosecute or not, but it
7 was -- there was a degree of caution taken about
8 how much detail was provided about security or
9 product weaknesses in a report that was going to
10 go straight to the suspect as part of their
11 discipline procedure.

12 **Q.** Mr Marsh, it's saying, "If there are facts and
13 matters which undermine the prospects of
14 success, they must be confined solely to the
15 confidential offender report", doesn't it?

16 **A.** It does, and I feel uncomfortable about that
17 wording but, certainly --

18 **Q.** So facts which support a suspect's defence or
19 which undermine the allegation against him must
20 be kept confidential, is what this document is
21 saying, isn't it?

22 **A.** No, sir. What it's saying is that they must go
23 to the lawyer, upon whom there is a duty of
24 disclosure so there is no question whatsoever
25 that that information will not find its way,

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1 having been considered by the lawyer, through to
 2 the suspect's legal team, if a decision is made
 3 to prosecute. Similarly, it would be a matter
 4 entirely for the manager taking disciplinary
 5 action to decide to what extent this information
 6 was released to the -- still use the term
 7 "suspect" but the person whom, you know, over
 8 which the discipline was being taken but --
 9 **Q.** It doesn't say that at all, does it? It doesn't
 10 say, "And then there must be consideration given
 11 to releasing to the suspect any facts and
 12 matters which undermine the case against them"?
 13 **A.** No, I'm sorry. I'm probably going way outside
 14 my remit. I'm trying to interpret something
 15 which is not my document, isn't a document that
 16 I had any involvement in the preparation or
 17 assurance of and don't necessarily feel
 18 comfortable with. But I'm trying to help the
 19 Inquiry to understand exactly what the document
 20 was attempting to achieve and I think I should
 21 leave it there.
 22 **Q.** This is writing into a policy as bold as brass,
 23 in black and white "Don't tell a suspect
 24 anything about the case against them that might
 25 undermine it", isn't it?

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1 significance that not only should it have been
 2 known by the investigation team and made known
 3 to the lawyers in any prosecutions but it should
 4 also have been made known -- we're talking about
 5 subpostmasters, so it's not discipline but it's
 6 the contract, the Retail Network Manager who
 7 considered their contract, it should have been
 8 known to that person, if it was known to the
 9 investigator, and if it was known within Royal
 10 Mail -- sorry, within Post Office Limited.

11 **MR BEER:** Thank you. Sir, it's just 1.00. Unless
 12 you had any questions of Mr Marsh arising so
 13 far, could I ask that we break until 2.00?

14 **SIR WYN WILLIAMS:** Yes, of course. We will break
 15 until 2.00.

16 **MR BEER:** Thank you very much.

17 **SIR WYN WILLIAMS:** Mr Marsh, I think you know that
 18 you shouldn't discuss your evidence but I'd just
 19 better remind you. All right?

20 **THE WITNESS:** Thank you, sir.

21 (1.01 pm)

22 (The Short Adjournment)

23 (2.00 pm)

24 **MR BEER:** Good afternoon, sir, can you see and hear
 25 us?

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1 **A.** Can I just clarify, for my own sort of knowledge
 2 here, this second part that we're looking at
 3 relates to the discipline report?

4 **Q.** Yes.

5 **A.** Yeah. So, as I say, there had long been
 6 a principle of not disclosing too much detail
 7 about weaknesses for fear that those weaknesses
 8 would be exploited much more widely. That is in
 9 discipline terms and not in any sense in terms
 10 of the criminal or the prosecution action that
 11 might be taken.

12 **Q.** Would you understand --

13 **A.** I'm not defending it -- sorry, I'm not defending
 14 it; I'm trying to help you to understand it.
 15 That's all.

16 **Q.** Would you, in helping us to understand it,
 17 understand the instruction not to reveal
 18 failures in product integrity to extend to any
 19 failures in the product which was Horizon's
 20 integrity?

21 **A.** No. That's -- I would not take -- I would not
 22 consider that to be an appropriate position for
 23 anybody to adopt, either in my team, you know,
 24 in the time when I was there, or after that.
 25 That is clearly a matter of such absolute

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1 **SIR WYN WILLIAMS:** Yes, thank you very much.

2 **MR BEER:** Thank you very much.

3 Mr Marsh, if we can continue, please. Was
 4 it your understanding that, in the course of
 5 an investigation, Post Office investigators may
 6 have occasion to involve the police service?

7 **A.** Yes, that's --

8 **Q.** In what circumstances?

9 **A.** In the circumstances where it was felt that
 10 a search would be required and that the suspect
 11 may not be willing to allow that search. In the
 12 circumstances where -- and this is involving the
 13 police in advance -- where it was believed that
 14 the suspect may not be willing to attend
 15 voluntarily for an interview or something like
 16 that, and also in circumstances where, for one
 17 reason or another, it's necessary for them to
 18 effect a citizen's arrest on a suspect, again
 19 usually because they couldn't undertake a search
 20 or something like that, at which point they
 21 would then do so but, of course, not being
 22 police officers, we couldn't then move or remove
 23 a suspect so we would have to wait for police
 24 officers to attend.

25 **Q.** Did Post Office investigators rely on the police

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1 service in order to get access to the Police
2 National Computer in order to either read
3 information on it, or to enter data into it, or
4 could they do that themselves?

5 **A.** No -- well, they couldn't do it themselves but
6 essentially Royal Mail Group or its predecessor
7 organisations had right of access to the PNC for
8 a variety of purposes and, although we lost
9 a number of those rights with privatisation, the
10 fundamental right to access the PNC, to put
11 suspect or offender details onto it and to get
12 details of people who were already on there
13 remained. Certainly up to the point when I left
14 in 2017.

15 **Q.** So it wasn't read-only access; they could make
16 entries centrally to the PNC or amend entries?

17 **A.** Centrally, about half a dozen people at most
18 were trained and vetted to do so, that's right.

19 **Q.** In order for them to do that, did they have to
20 be passed information by an investigator --

21 **A.** Yes.

22 **Q.** -- in order to enter the data up?

23 **A.** That's right, yeah.

24 **Q.** What information would an investigator pass to
25 the -- I'm going to call them the Post Office

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1 non-appearance. In those circumstances, I think
2 it's actually the court or the police officer
3 attached to the court that makes that entry.

4 If we wanted somebody circulated then
5 somebody, an investigator, would have gone into
6 a police station by arrangement, would have
7 reported the crime we were investigating and
8 would therefore have arranged for that person to
9 be circulated as wanted. So there were things
10 that we could do but not through our own
11 terminals.

12 **Q.** Going back to the provision of information to
13 the police service by the Post Office centrally
14 post-conviction, that information you said was
15 drawn from the offender report, a template for
16 the first page of which we saw before lunch?

17 **A.** That's correct.

18 **Q.** In order to provide the police service with
19 information to be entered onto the PNC or to
20 enter information onto the PNC, one must conform
21 to the standards set by the PNC, presumably?

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

23 **Q.** Was there any policy or practice within the Post
24 Office or the Royal Mail Group that you're aware
25 of that required investigators to record the

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1 PNC people, in the course of an investigation
2 and at what stages?

3 **A.** Well, it wouldn't be in the course of
4 an investigation. Although the necessary
5 information to put a person onto the PNC as
6 an offender would be gathered by the
7 investigator and would be present in the
8 preamble to the report we looked at, it's my
9 belief that, actually, we didn't make an entry
10 to the PNC until a person had been convicted,
11 and only after conviction would we make that
12 entry, using the offender report -- well, using
13 the information drawn from the offender report.

14 **Q.** So unlike the police service, when somebody was
15 circulated as wanted, as outstanding on
16 a warrant for arrest, charged, all
17 pre-conviction stages where entries may be made
18 on to the PNC, that didn't occur. It was only
19 post-conviction?

20 **A.** Yeah, I -- that's my belief. Again, it's one of
21 the many jobs within my team that I didn't do
22 myself but, from memory, that's my belief, yes,
23 that we wouldn't make that entry. When you talk
24 about circulated, I mean, obviously, one goes to
25 court to get a warrant in the event of

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1 racial or ethnic origin of those whom they
2 investigated?

3 **A.** There was a requirement to do so using the term
4 "identity code" because it was not possible to
5 put a person onto the Police National Computer
6 without either giving one of six numerical codes
7 that, in a very crude way, defined the person's
8 identity code and it was a term -- well, these
9 codes were previously known as "ethnic groups"
10 and they were definitely neither ethnic nor
11 groups of people but the term "identity code"
12 was used 1 to 6, and then the seventh code
13 number, which oddly enough was 9, where it was
14 "Not known" or "Other".

15 And yeah, as I say, you couldn't put
16 a person on to the PNC without either giving
17 them a code 1 to 6, or without giving them
18 a code 9.

19 **Q.** Presumably the Post Office would therefore wish
20 to know from the police what those codes were,
21 and how any further guidance on who fell within
22 which group was to be applied?

23 **A.** Yes. So the Post Office -- this is the early --
24 the Post Office/Consignia/Royal Mail, through
25 the Home Office, had always had details in

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1 extremely neutral terms of what the description
2 of those code numbers was, and those appeared on
3 the form that the PNC inputters used and were
4 available to investigators for information so
5 that they knew what IC number to accord to a
6 suspect.

7 **Q.** Because you'd need to know what the IC codes
8 were and how they were understood by the
9 operators of the Police National Computer before
10 you could, in the Post Office, provide them with
11 the data?

12 **A.** There's got to be a consistency otherwise the --

13 **Q.** The whole system is useless?

14 **A.** Exactly, yes.

15 **Q.** You remember that, as part of the file front
16 sheet document I showed you earlier -- I'm not
17 going to bring it back up now, I asked us all to
18 remember it -- it said, "ID code" or
19 "identification code"?

20 **A.** Yes.

21 **Q.** It said 1 to 7 in brackets afterwards. Was that
22 the space on the front page of the file, the
23 offender report, that the identity code of the
24 suspect was written?

25 **A.** That was, yeah. That's correct.

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1 of documents drawing directly on the Home Office
2 terminology to identify the code numbers, which,
3 as I said are 1 to 6 and then 9, and they
4 certainly didn't use -- they didn't give the
5 sort of "ie", which I presume actually should be
6 "eg", underneath the different descriptions.
7 They certainly didn't give a description such as
8 the one at number 3.

9 There is a standard set of terminology used
10 by the Home Office, by police services, by
11 anybody in this line of work and, as I say, it's
12 a very crude and, I think, outdated system, but
13 it's required for the PNC, and I have no idea
14 why somebody would feel it necessary to
15 interpret the neutral terms in this way.

16 **Q.** Putting aside the racist and offensive language
17 within the document for one moment, it makes no
18 sense, does it, because you're contributing
19 information to the Police National Computer for
20 use of Law Enforcement UK Plc in the future, and
21 it's got to be consistent with how everyone else
22 understands the identity codes?

23 **A.** No, it makes no sense whatsoever. The terms, as
24 the Home Office used them, had no need of
25 interpretation and, as I say, certainly not the

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1 **Q.** Is it from there that the Post Office centrally
2 would provide -- or would take information in
3 order to provide to the PNC in the event of
4 a conviction?

5 **A.** I believe so, yes.

6 **Q.** As part of the same suite of documents, as the
7 guide to the preparation and layout of
8 investigation red label case files that I showed
9 you before lunch, was a document -- which
10 I would ask to be shown, which is POL00115674.

11 Thank you.

12 Have you seen this document before?

13 **A.** Only yesterday, when I observed Mr Ferlinc
14 giving evidence. I'd read press reports about
15 it being presented through a FOIR earlier.

16 **Q.** Did you see it during the course of your career
17 within the Post Office?

18 **A.** I certainly did not, no.

19 **Q.** Are you aware of a document similar to it
20 circulating within the Security Team, either of
21 the Post Office or Royal Mail Group, giving
22 guidance to investigators on how to fill out the
23 bit of the file template which requires them to
24 state the identity code of a suspect?

25 **A.** Over the years there have probably been a number

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1 word that's used at number 3.

2 **Q.** Although the Post Office is currently
3 investigating the origins and the period over
4 which this document was within circulation
5 within the security team, information provided
6 to date suggests that it was circulating within
7 the security team between 2008 and 2016. Do you
8 know who would draw up a document like this?

9 **A.** I don't. I mean, you know, I would have to
10 assume that a document like this would receive
11 some sort of assurance at some senior level in
12 the team, whether it was drawn up by somebody
13 senior within the team -- I've no idea. As
14 I say, I've no idea why anybody would feel the
15 need to do this, other than for racist purposes,
16 and I cannot imagine how it got through any sort
17 of reasonable assurance process.

18 **Q.** So it's got seven ID codes on it, each of which
19 is said to relate to a type of person. You'll
20 see that, for example, "White skinned European
21 types" at number 1 is defined, in fact, by
22 a series of countries --

23 **A.** Yeah.

24 **Q.** -- or nationalities. So white people are
25 presumed to be British?

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- 1 **A.** Which is nonsense. British people can be from
 2 any ethnic grouping just as, you know, French,
 3 German, Swedes might be. As I say, it makes
 4 absolutely no sense whatsoever from any sort of
 5 operational perspective and it is deeply
 6 offensive. I can't imagine why anybody would do
 7 this, other than some sort of dog whistle
 8 racism.
- 9 **Q.** That category 1 wouldn't accommodate somebody
 10 like me, would it? I'm British.
- 11 **A.** Like I say --
- 12 **Q.** I've got brown skin.
- 13 **A.** It's an extremely crude system. There is
 14 a better system in place employed by the Met
 15 Police, a 16-point self-description, so
 16 a suspect is asked to self-describe themselves.
 17 But you're right, this system here, if somebody
 18 had to make a judgement, yeah, you wouldn't be
 19 accommodated in category 1.
- 20 **Q.** Yet I'd like to be defined as British. I've got
 21 a passport and there are other things that
 22 I could point to to demonstrate my Britishness
 23 but I wouldn't fall within category 1, would
 24 I --
- 25 **A.** No, no.

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- 1 I probably had a bit of a reputation for being
 2 extremely sensitive about these sorts of things.
 3 And, frankly, I wouldn't have tolerated it. And
 4 something like this would have required someone
 5 to go and get very severely re-educated and
 6 probably I would have considered that a person
 7 who could produce a document like this and put
 8 it forward could not work within the security
 9 team, because we were a team that were
 10 particularly sensitive to allegations of bias,
 11 partiality and racism, and we couldn't have
 12 somebody who could consider this to be
 13 acceptable.
- 14 So I wouldn't say for a minute that we
 15 didn't have, within the team, one or two racists
 16 but -- you know, because that's
 17 an inevitability, but I can't think of anybody
 18 who would have dared to produce something like
 19 this working for me.
- 20 **Q.** Did you work with or did he work for you, Dave
 21 Posnett?
- 22 **A.** I believe he did. I couldn't honestly say knew
 23 him well but I recognise the name. Yes.
- 24 **Q.** What was your opinion of him as an investigator?
- 25 **A.** Well, as I say, I honestly -- I think he was

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- 1 **Q.** -- because of my skin colour?
- 2 **A.** You know, this stems, if you take it back to the
 3 days when it was called an ethnic group, it
 4 stemmed from the need over the police radio to
 5 give a number. I don't quite know whether they
 6 need to give number, but anyway, to give
 7 a number for somebody in pursuit of someone,
 8 gave them an opportunity to narrow down the look
 9 of the person they were following.
- 10 It was crude then, it's crude now. I am
 11 very much surprised that the PNC -- well,
 12 certainly by the time I left they were still
 13 using these codes. I was surprised in 2017 that
 14 they hadn't got round to putting something much
 15 better in place, other than the fact that all
 16 the previous records would bear the old data.
 17 But yeah, no, it's --
- 18 **Q.** So ID code 2, just to deal with this shortly
 19 then, mixes up skin colour with nationality --
- 20 **A.** Yeah.
- 21 **Q.** -- as well, doesn't it? In relation to category
 22 3, "Negroid types", is that language which was
 23 within use in the Post Office and Royal Mail
 24 when you worked within it, within them?
- 25 **A.** No. Put it this way, never within my hearing.

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- 1 well thought of as an investigator but I didn't
 2 know the individual particularly well myself.
- 3 **Q.** ID code 5 refers to:
 4 "Chinese/Japanese Types
 5 "ie, Malaya, Japanese, Philippino [*sic*],
 6 Burmese, Siamese, Mongolia, et cetera."
 7 This is referring to people who are Siamese.
 8 I think you'll probably remember --
- 9 **A.** I might just about remember Siam but I think --
- 10 **Q.** 1939, it was.
- 11 **A.** That's right. Well, in fact, I wouldn't
 12 remember it personally but I remember the term
 13 being used, yes.
- 14 **Q.** It became Thailand.
- 15 **A.** Thailand, yes.
- 16 **Q.** ID code 6, "Arabian/Egyptian Types", are
 17 referred to in contrast to "Negroid Types".
 18 You'll see "Negroid Types" includes African
 19 amongst its subcategory or its definition.
 20 That's in contrast to North Africans within
 21 Arabian types.
- 22 So you never saw this document and you're
 23 expressing amazement to the Inquiry that it was
 24 ever written and never challenged, so far as we
 25 can tell at the moment?

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1 A. Mm.

2 Q. I think you've told us that it doesn't make
3 sense why it would be used --

4 A. No, I mean --

5 Q. -- because the subcategories aren't in line with
6 what the police service were using?

7 A. Well, exactly. They don't really. I mean, the
8 language is abhorrent but the detail is
9 misleading. So I think it would be very
10 unhelpful indeed if something like that were
11 being provided to individuals -- well, of any
12 sort but I mean individuals who hadn't seen the
13 proper definitions as produced by the Home
14 Office.

15 Q. Okay, that can come down. Thank you. Can we
16 turn, please, to POL00088867. You'll see that
17 this is the front sheet -- we'll come on to the
18 actual document itself -- to a document, the
19 title of which is "Liability for Losses Policy
20 (for agency branches)"; can you see that?

21 A. I can see that, yes.

22 Q. The version control suggests that it's version
23 1.7 of --

24 A. I think we know from looking further down that
25 it's version 2 and that, again, looks to me like
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1 you are responsible and accountable for its
2 terms?

3 A. That's right, yeah.

4 Q. We see under "Approval" that business input,
5 there's a series of names, and then under
6 "Assurance" you're listed by your name and your
7 title.

8 A. Yes.

9 Q. Then under "Authorisation" you're listed by
10 title.

11 A. Yes.

12 Q. So what does, as well as being the owner of
13 a policy, it denote that you gave assurance for
14 or to the policy?

15 A. Well, it meant that I went through the policy
16 after all of the input, all the business input
17 had gone in from all of these people, Martin
18 would have collated all of this together and
19 undoubtedly shown me a draft -- well, I'm not
20 convinced that there was a significant change in
21 this document from previous documents. Within
22 the bundle, there is a document that goes back
23 to 1998, which is broadly similar but there were
24 some minor wording changes and I will have gone
25 through the document and satisfied myself that
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1 a piece of -- you know, something that should
2 have been updated and wasn't.

3 Q. Yes, I mean, you're referring, if we go over the
4 page, please, to the last box --

5 A. The fact that as part of the progress we've
6 actually got a 2.0 suggests to me that this is
7 version 2.

8 Q. Then if we go back, please, putting that sloppy
9 drafting to one side, we can see that Mr Ferlinc
10 wrote it and you are the owner of it.

11 A. That's correct.

12 Q. What does being the owner of a policy entail?

13 A. I suppose ultimately accountability for the
14 policy. Essentially, it means it's a policy
15 which emanates from a team that I was in charge
16 of, although I know -- I don't want to sort of
17 second-guess your next questions but I know
18 we're going to come on to the issue of the
19 contractual liability for losses, and that
20 itself stems from the subpostmaster's contract.

21 So in a way, this is an interpretation of
22 the liability that is clearly sort of laid out
23 in the contract that subpostmasters signed with
24 Post Office Limited.

25 Q. So the short answer is, as owner of the policy,
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1 I was happy for that document to be published in
2 my name.

3 Q. Just for the transcript and for the future --
4 there is no need to show it now -- the document
5 from November 1998 that I think you're referring
6 to is POL00088094.

7 A. Yes, and my point is that some critical pieces
8 of wording in this document actually sort of
9 exist in that document that pre-dated my joining
10 Post Office Limited.

11 Q. Why are you mentioning that?

12 A. I just think it's worth noting.

13 Q. Yes, but why?

14 A. Because I know that you're going to go on
15 about -- go on to question me about the element
16 about liability.

17 Q. So you are sort of getting in first and saying,
18 "I inherited a policy"?

19 A. I'm sorry, I shouldn't do that, right.

20 Q. I just want to know. Is that what was about to
21 come, "I inherited a policy"?

22 A. I'm not saying I didn't own that policy, I just
23 wanted to demonstrate the fact that, you know,
24 the policy -- the principles within this policy
25 are, you know, long-term. They have been the
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1 principles within Post Office Limited, POCL,
2 Post Office Counters Limited, the predecessor,
3 for many years.

4 **Q.** Thank you. Can we look at page 8, please, and
5 under section 6 "Horizon Issues". I think you
6 will be familiar with this because you were
7 watching all of Mr Ferlinc's evidence yesterday.
8 Section 6, Horizon Issues, I'll read it out
9 first:

10 "If an agent feels that an error has
11 occurred via the Horizon system, it is essential
12 that this be reported to the Horizon System
13 Helpdesk. The [Horizon System Helpdesk] will
14 only consider the incident for further
15 investigation if the branch has evidence of
16 a system fault. If no evidence is available,
17 the case will not be investigated, and the agent
18 will be held responsible for making good the
19 loss.
20 "System faults are very rare and are
21 normally identified after a full investigation
22 has been undertaken. All known system errors
23 are managed through Network Support Problem
24 Management. Access to Problem Management is via
25 the [Network Banking Support Centre]. If the

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1 **A.** No, absolutely.

2 **Q.** It was all working perfectly?

3 **A.** Well, no, I'm not saying it was working
4 perfectly. All I'm saying is --

5 **Q.** Your understanding was?

6 **A.** My understanding was, yes.

7 **Q.** So you think Horizon Issues got its own section
8 because Horizon was new?

9 **A.** I don't think Horizon Issues got its own
10 section -- yes, I think so. I don't believe
11 there was anything underhand or untoward about
12 that section being placed in this policy
13 document at this time.

14 **Q.** The second sentence of the first paragraph:

15 "The [Horizon System Helpdesk] will only
16 consider the incident for further investigation
17 if the branch has evidence of a system fault.
18 If no evidence is available, the case will not
19 be investigated and the agent will be held
20 responsible for making good the loss."

21 Would you agree that the effect of this Post
22 Office policy is that it is saying that it will
23 only investigate, if there is a Horizon System
24 fault, if there is already evidence of a Horizon
25 System fault?

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1 agent feels that the issue is not being resolved
2 they should flag the issue up with [Network
3 Banking Support Centre]. If a known system
4 error has caused a shortage, the agent should be
5 given authority to hold the loss in suspense
6 until the system error has been reconciled and
7 an error notice issued."

8 Do you know why this section was separated
9 out and Horizon got its own section?

10 **A.** I don't know. So I would be making
11 an assumption here, but my assumption would be,
12 because Horizon was a relatively new issue
13 for -- relatively -- you know, a relatively
14 recent change in process and procedure within
15 Post Office Limited, it was something that
16 needed referring to separately.

17 **Q.** It wasn't that there were known issues with
18 Horizon?

19 **A.** I was not aware of any known issues with
20 Horizon.

21 **Q.** Yes, you tell us in your witness statement that,
22 throughout the entirety of your time, right
23 until you left Royal Mail Group, I think, you
24 weren't aware of any issues with the Horizon
25 System?

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1 **A.** Mm. I would agree that that's the way it
2 sounds, and I -- yeah.

3 **Q.** That's problematic, isn't it?

4 **A.** It's problematic, yeah.

5 **Q.** Why is it problematic?

6 **A.** Well, it's problematic -- I mean, it's
7 problematic because it confers upon the
8 subpostmaster -- or whoever, but the -- sorry,
9 the subpostmaster in this case -- a duty, if you
10 will, or, you know, a responsibility to know
11 about, to be able to articulate, what a Horizon
12 system fault might be. I'm trying to avoid
13 getting into the areas of supposition here.
14 I presume that the thinking at the time was that
15 a system fault would be -- would manifest on
16 a widespread basis. I think our experiences, as
17 people within Royal Mail, of very large
18 systems -- and we had several very large systems
19 within Royal Mail -- was, when there was
20 a system fault, generally speaking it was quite
21 visible and, usually, you know, it impacted
22 quite widely and the technicians would know
23 about it and would be getting on with dealing
24 with it.

25 And I suspect that in this case, our

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1 expectation would be that, whether or not
2 somebody was able to report evidence of a system
3 fault upfront, as it were, if there were
4 a system fault, it would become evident quite
5 quickly and we would be able to capture any
6 early victims of faults within -- you know,
7 within the rectification of that fault. I know
8 that's --

9 **Q.** It doesn't even say that, does it?

10 **A.** No, it doesn't. I'm trying to, you know --

11 **Q.** It doesn't say "If a subpostmaster says that
12 an error has occurred because of the Horizon
13 System, we will check to see whether there are
14 any known system faults. We will look at the
15 other branches. We will see whether it's
16 manifested itself". Instead it points the
17 finger back at him or her, doesn't it, and say,
18 "It's only if they, the branch, has evidence of
19 the fault, will it be investigated". So "Only
20 if there is evidence of a fault, will we
21 investigate if there is evidence of a fault".

22 **A.** Mm.

23 **Q.** It's just nonsense on stilts, isn't it?

24 **A.** I wouldn't go that far but I would say it
25 certainly is not a particularly balanced way to

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1 agent is responsible for all losses caused
2 through his own negligence, carelessness or
3 error. He is also responsible for losses caused
4 by the actions of any assistants, managers or
5 relief personnel employed by him."

6 Then this:

7 "This policy, consistent with the
8 contractual relationships between Post Office
9 Limited and its agents, is designed to clarify
10 circumstances where mitigation may be
11 appropriate and to provide a clear framework to
12 handle individual cases."

13 Is what that's saying, that where we later
14 write in the policy that the Helpdesk will only
15 consider an incident for investigation if the
16 branch has evidence, pre-existing evidence, of
17 a system fault, that that's consistent with the
18 contractual provisions which say an agent is
19 responsible for all losses, unless caused by
20 their own negligence, carelessness or error?
21 It's drawing a link between them, isn't it,
22 where it says "this policy, consistent with
23 contractual relationships between Post Office
24 and agents".

25 **A.** Well, I think that paragraph is accurate.

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1 approach the possibility of system faults within
2 the Horizon System.

3 **Q.** The agent doesn't have right of access to the
4 message store, do they?

5 **A.** I don't know what the message store is but
6 I mean the agent has very limited rights beyond
7 those of a person running a branch, that's
8 right.

9 **Q.** The agent doesn't have access to Horizon log
10 files, do they? The agent can't pull up the ARQ
11 data, can they?

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

13 **Q.** How are they going to come up with evidence of
14 a system fault?

15 **A.** No, I accept that. I don't see how they can.
16 I can see how, if a system fault takes place and
17 it affects branches more widely than it's
18 feasible that they would understand that they
19 were part of a network of people affected by
20 a certain system fault but, as the first person
21 to report one, it's difficult to imagine how
22 they could do that.

23 **Q.** If we go back, please, to page 4, and look
24 halfway down. The section starting:

25 "From a purely contractual perspective, the

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1 I think where the policy document falls down is
2 that it's a sort of circular argument about the
3 Horizon System, which is that for you to report
4 a system fault, you've got to know there's
5 a system fault. But if we don't know there's
6 a system fault, you can't report the system
7 fault. That, I think, is where that -- the
8 section we've been looking at before definitely
9 falls down.

10 **Q.** Is what we see written -- if we go back please
11 to page 8 and the first paragraph under
12 section 6, is what we see written there another
13 way, a different way, of expressing a statement
14 that "Horizon is robust, Horizon is infallible.
15 Unless you can show, unless you have evidence
16 that there is a system fault, there is no system
17 fault"?

18 **A.** I think that is a fair assessment, yes. As
19 I have said earlier and as you heard Martin
20 Ferlinc say yesterday, we -- it was a strongly
21 held belief and position within Post Office
22 Limited that Horizon was a robust system working
23 well. There was certainly no information
24 shared, you know, either widely, narrowly, if
25 you will, with those who might need to know it,

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1 like myself and Martin or indeed, you know,
2 a matter of gossip or anything like that, about
3 there being problems with the Horizon System.

4 Had anything like that come up, either
5 officially or merely, as I say, as gossip, it's
6 something I would have looked into. But there
7 was probably a degree of groupthink of accepting
8 the position that was advanced, which was that
9 Horizon was robust and operating well. As
10 I said, I'm sort of -- my own position on this,
11 had you asked me before all of this came out is,
12 I would have an expectation that a large system
13 like that would either function well or not
14 function.

15 **Q.** The second paragraph here:

16 "System faults are very rare and are
17 normally identified after a full investigation
18 has been undertaken."

19 Where did the information come from that
20 system faults were very rare?

21 **A.** No one ever suggested to me that there were
22 system faults so, as I said, I didn't write this
23 but I assured it so I certainly, having read it,
24 I would have been comfortable with the content
25 of this policy but I didn't write it and

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1 I was asking you questions about:

2 "System faults are very rare and are
3 normally identified after a full investigation
4 has been undertaken."

5 The Inquiry has heard from a range of
6 subpostmasters, a large range of subpostmasters,
7 and indeed their families, that the attitude of
8 investigators to them was that if they raised
9 the suggestion that the fault with the finances
10 or the discrepancy in the accounts was a fault
11 with the Horizon System, rather than them
12 stealing the money, the response was "That is
13 not something we have heard before. You're the
14 only person who has said that".

15 Would that reflect what is written up here,
16 namely that system faults are very rare?

17 **A.** I don't think that this document would be
18 a document from which the investigators were
19 taking a lead but I think it would accord with
20 the general belief in the business that the
21 Horizon System was robust. I mean, I'd like to
22 think that, if an investigator heard the same
23 story about the same type of loss more than
24 once, they would have the common sense to raise
25 it but I suspect that they, like myself, had

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1 I suspect, as Mr Ferlinc said yesterday, it was
2 something that was vouchsafed to him probably
3 from within the Horizon Programme itself.
4 I don't think we would have written this off our
5 own bat. I think we would have taken input and
6 I imagine one of the business inputs names would
7 have been somebody from the Horizon Programme,
8 although I couldn't tell you from those names
9 which one.

10 **MR BEER:** Sir, there is a document issue that I need
11 to attend and to I wonder whether we might take
12 a short break now. Thank you very much now.
13 I can see you can't unmute but message received.
14 Thank you.

15 Can we say maybe 15 minutes. Thank you.

16 (2.34 pm)

(A short break)

17

18

19 (2.51 pm)

20 **MR BEER:** Good afternoon, can you see and hear me?

21 **SIR WYN WILLIAMS:** Yes, I can.

22 **MS PAGE:** Thank you very much, sir, we were looking
23 Mr Marsh at POL00088867.

24 Thank you. Can we go to page 8 of the
25 document, please, the second paragraph which

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1 absorbed a very strong belief from the business
2 that the Horizon System was robust.

3 **Q.** You absorbing a strong belief from the business
4 about the robustness of Horizon, you now know,
5 I think, and it's been found by the High Court,
6 and this Inquiry is to adopt the findings --

7 **A.** Yes.

8 **Q.** -- that the Horizon System was, both in its
9 original form, Legacy and Horizon Online,
10 afflicted by a series of bugs, errors and
11 defects which either had the potential to cause
12 or did cause shortfalls in the postmasters'
13 accounts?

14 **A.** Yes, I accept that.

15 **Q.** What was the system for ensuring that you and
16 your investigators knew about that at the time?

17 **A.** I cannot say because it didn't happen. But
18 I presume that if there were any weakness in the
19 system that was identified and admitted, then my
20 investigators, who regularly were in contact
21 with ICL Pathway and Fujitsu, and other team
22 members who were actually in contact with the
23 Horizon programme, would have been made aware of
24 it.

25 **Q.** Was there any formalised process in place that,

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1 for the purposes of country-wide investigations,
2 retained database or a spreadsheet or even
3 a running log for the purposes of investigations
4 of bugs, errors and defects that cause or may
5 cause discrepancies?

6 **A.** Well, there wasn't because there hadn't been
7 a report made, as far as I'm aware. Again, let
8 me say, as far as I'm aware there wasn't
9 because, as far as I'm aware, there hadn't been
10 such reports made and accepted and validated
11 within Post Office Limited and I recognise that
12 is clearly a failing of the circumstances in
13 Post Office Limited at the time, that everybody
14 had a groupthink that the Horizon System was
15 robust. And, certainly, I think, had any
16 information come to us about a first bug in the
17 system, then we would have developed a process
18 to ensure that we captured details of any
19 further bugs.

20 But, to the best of my knowledge, nothing
21 happened to trigger any suspicions that there
22 might be problems with the Horizon System.

23 **Q.** This document, in its first paragraph here,
24 says:

25 "The HSH will only consider the incident for
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1 captured within their system. But I didn't --
2 you know, I had nothing to do with running the
3 Network Business Support Centre, I just happened
4 to know from having discussed that with the
5 people that did.

6 **Q.** What about putting in place a system in advance,
7 "We're running an incredibly complicated
8 computer system here, everyone in IT that you
9 speak to says that it will have bugs, errors and
10 defects in it, which will have the potential
11 to" --

12 **A.** No, I'm sorry. No, everyone I speak to --

13 **Q.** Says it will be perfect all the time?

14 **A.** Well, I don't think they would necessarily have
15 said that but they certainly weren't advancing
16 the viewpoint that there would be all sorts of
17 bugs, errors and issues.

18 **Q.** You see, Mr Marsh, we've had a succession of
19 people come in and out of this Inquiry room to
20 say exactly that, "Don't worry about the bugs,
21 errors and defects, they're present in every IT
22 system".

23 **A.** Right.

24 **Q.** "Everyone knows that", they've told us, "and
25 therefore the bugs, errors and defects that
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1 further investigation if the branch has evidence
2 of a system fault."

3 Who was the Horizon System Helpdesk run by?

4 **A.** I don't know. I suspect that was either Fujitsu
5 or it was a specialist tier at the NBSC, the
6 Network Business Support Centre. I couldn't say
7 which one.

8 **Q.** Was there a system in place for recording issues
9 raised and complaints made about the integrity
10 of the Horizon System for the purposes of
11 disclosure in criminal proceedings?

12 **A.** No, there wasn't such a system. There was, to
13 answer part of that question -- well, the
14 Network Business Support Centre had a very
15 effective system for capturing details of any
16 issues that were raised with them, not just
17 Horizon, any issues at all that were raised with
18 them, which is how they tended to get on top of
19 problems with products and things like that
20 fairly quickly, because they would pick up the
21 fact that there were two, three, four, half
22 a dozen reports made.

23 So I would have thought, within the Network
24 Business Support Centre, if these sorts of
25 issues were being raised, they should have been
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1 you're seeing, nothing to worry about". Was
2 there not, at a design level, right at the
3 beginning, thought given to "We're introducing
4 a big system here, it's very complicated, it
5 runs billions of transactions, it's foreseeable
6 that there will be faults with it, we need to
7 record those because they might have a modest
8 impact on our investigations. There might be
9 an occasion, just once in the next decade, when
10 it's the computer's fault and not the
11 individual's"?

12 **A.** Well, that -- I hate to use the term "in
13 hindsight" but in hindsight you're right. What
14 I would say is had anybody given us that initial
15 trigger to tell us that there was a first bug
16 with the system which affected an office which
17 caused a loss that we might have investigated,
18 we might be investigating or have investigated,
19 we would undoubtedly have put such a system in
20 place. So I know that that's a little bit
21 retrospective but we would have done that, had
22 we had any indication that there was such
23 a problem. To the best of my knowledge, we
24 never had that indication, so it is an admission
25 that we didn't have, essentially, an empty
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1 database waiting to capture details of any bugs
 2 or system issues, but I would have expected Post
 3 Office Limited to have acted in a way different
 4 to the way we now know it did act and to have
 5 been open about problems so we could have
 6 responded to them, rather than to hide them.
 7 And Fujitsu, you know, both the relevant parts
 8 of both businesses.

9 **Q.** Who do you understand to have been doing the
 10 hiding?

11 **A.** Well, I only understand from the reports that
 12 I've read that it's certainly Fujitsu and
 13 I wonder whether, within Post Office Limited,
 14 there may have been people who were also aware.
 15 But I don't know, I -- you know, as I say,
 16 I knew nothing about this when I was at Post
 17 Office Limited and I have no recollection of the
 18 issues being raised when I continued to work in
 19 Royal Mail Group.

20 **Q.** Have you spoken to any of your friends and
 21 colleagues from the time, ie between 1999 and
 22 2007 to say, "Hey, look, what went wrong here?"
 23 I feel a modicum of responsibility that many
 24 people have been wrongly convicted, I feel
 25 a modicum of responsibility that some people

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1 please.

2 **MR BEER:** I'll say that out loud so that other
 3 people and the Chairman can hear. The wifi has
 4 dropped out of the building, or at least the
 5 room that we're in. The transcriber is
 6 continuing to make a continuous record of the
 7 proceedings and, therefore, that will be
 8 available at the end of the day. There's just
 9 no live time transcription. Subject to anything
 10 you would say, sir, I propose to continue.

11 **SIR WYN WILLIAMS:** We always do continue in these
 12 circumstances, don't we?

13 **MR BEER:** Yes, thank you.

14 Looking at the bottom of the second page,
 15 you'll see this is an email from, I think, Clive
 16 Read to Ruth Holleran, to you and copied to Sue
 17 Harding; can you see that? Can you help us with
 18 who Clive Read was and what his position was at
 19 about this time, January 2004?

20 **A.** I can't. I think it was to do with the Horizon
 21 project or to do with a programme around the
 22 Horizon project. I honestly don't know. I'm
 23 only taking that in context from the email that
 24 I've seen.

25 **Q.** Okay, if we just go to the second of the chain,

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1 went to prison. I want to find out what went
 2 wrong. Do you know what went wrong?"

3 **A.** Do you mean have I asked them?

4 **Q.** Yes, have you asked them?

5 **A.** I have spoken -- I don't speak to a great many
 6 of my former colleagues in Post Office Limited.
 7 That was a lot further back in my career than
 8 the last 10 years at Royal Mail Group but I have
 9 spoken to people. I haven't come across anybody
 10 who I knew, or who worked for me at that time,
 11 who has any knowledge whatsoever, who says that
 12 they had any knowledge of the issues. So the
 13 only answer to the question "What went wrong"
 14 that we have at the moment is what we pick up
 15 from the reports from the Inquiry, and those
 16 around the Inquiry, in the press and other
 17 media.

18 You know, I haven't come across -- I haven't
 19 searched for it because I was pretty sure I was
 20 going to be called as a witness but haven't come
 21 across anybody in the course of socialising who
 22 has said "Oh, I know what went wrong" or "I knew
 23 about that".

24 **Q.** Can we look, please, at FUJ00126036. Can we
 25 look, please, at the bottom of the second page,

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1 page 4. We can see his signature block, he was
 2 the Chief Systems Architect within POL.

3 **A.** So he was front and centre for all major
 4 information systems projects.

5 **Q.** One of the things he's dealing with is the
 6 IMPACT Programme, which you will recall and
 7 which you've spoken about in your witness
 8 statement.

9 **A.** Yes.

10 **Q.** He says, if we go to the top of page 3, please:
 11 "As you know we are currently in the middle
 12 of requirements workshops on the final phase of
 13 the IMPACT Programme. Although we have
 14 a scheduled Stakeholder meeting early in
 15 February, given tight timescales there are some
 16 emerging concerns which I think I need to flag
 17 up."

18 Then he sets out suspense account threshold
 19 and if we go to 2, his second heading, "Suspense
 20 Account Authorisation:
 21 "The current assumed position is that
 22 subject to the threshold above, the requirement
 23 to seek telephone authorisation for posting
 24 variances to Suspense would cease, on the
 25 understanding that improved timeliness and

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1 visibility of office liabilities (next day,
 2 single view of office cash and liability) would
 3 provide sufficient control (given that currently
 4 there is a two-week lag between suspense
 5 postings and visibility of these centrally).
 6 "The Operations and Security view was that
 7 removal of this control would declare 'open
 8 season' on the use of Suspense postings, leading
 9 to loss of financial control, spiralling
 10 non-conformity, etc."
 11 Then if we can look at your reply, please.
 12 If we scroll down please. Thank you. Second
 13 paragraph, you say:
 14 "Clive ...
 15 "On the suspense account issue, I'm afraid
 16 I share the same belief as mine as other Ops
 17 reps, if there is no independent control and
 18 authorisation process for the use of suspense
 19 accounts then postings will rapidly increase to
 20 unacceptable levels. Irrespective of our
 21 aspirations for a simplified process to support
 22 commercially minded agents I believe that many
 23 of those from a more historic mindset will
 24 exploit the facility, creating a large parcel of
 25 manual work for someone, NBSC or Retail Line, to
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1 me very concerned was the retention of
 2 a suspense account without any controls around
 3 it. So the suspense account -- and I had to
 4 remind myself of this as I was producing my
 5 statement -- the point about the suspense
 6 account was if you balance your sub post office
 7 and find there's a £1,000 shortage and you've
 8 gone through absolutely everything in the
 9 office, so it's not an error that you've made in
 10 the office -- and this I both pre- and
 11 post-Horizon -- you, at that point in time, you
 12 were not allowed to balance the office until
 13 you'd made contact with the NBSC, you'd recorded
 14 this loss with them, and they gave you authority
 15 to put the loss -- to record the loss on your
 16 balance sheet, or I presume they gave you some
 17 sort of code or something for Horizon, I don't
 18 know about that.
 19 My concern was the proposal was that,
 20 effectively, they get a button, this -- I think
 21 was "Settled Centrally" button, which would
 22 enable them to take a loss of any size and put
 23 it into a central account. They balanced that
 24 night, which was a good thing, obviously, but
 25 there was no process in place.
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1 do to agree terms to reduce each individual
 2 posting."
 3 Then reading on, you say:
 4 "Given the overall project should simplify
 5 reconciliation and settlement significantly and
 6 should therefore mean that errors will be
 7 identified more rapidly and will be even more
 8 clearly the fault and responsibility of the
 9 agent, is there any reason to have a suspense
 10 facility at all? This might mean that in
 11 extreme cases the agent would need to contact
 12 the retail line or NBSC and negotiate a 'loan'
 13 (at some level of interest?) to cover very high
 14 values of loss but in most cases the agent
 15 should be sufficiently capitalised to cover
 16 ordinary variations, particularly the
 17 opportunity were offered to make good losses via
 18 credit card, thereby enabling them to tap into
 19 up to 56 days of interest free credit
 20 (a facility favoured by the NFSP despite my
 21 early misgivings)."
 22 So you, I think from this, were in favour of
 23 removal of the suspense account facility?
 24 A. No. Just to be clear, I wasn't in favour of
 25 removal of the suspense account. But what made
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1 The idea of "settle centrally" meant "I put
 2 this £1,000 into a central account and probably
 3 I put a £1,000 cheque into the till that day".
 4 But we knew that a lot of subpostmasters were
 5 not sufficiently capitalised to do that and it
 6 was going to cause a problem and the point is,
 7 as things stood pre-this email -- or at least
 8 sort of before the changes that they wanted to
 9 make -- there was a control mechanism, the NBSC
 10 had to take a view and have a discussion with
 11 the subpostmaster about how they would handle
 12 the loss.
 13 So I wasn't in favour of removal of the
 14 suspense account but what I really wasn't in
 15 favour of was this halfway house of a suspense
 16 account with no controls around it.
 17 Q. Who were you referring to, what did you mean by
 18 "those of a more historic mindset will exploit
 19 the facility"?
 20 A. Obviously, a lot of the subpostmasters that we
 21 had -- well, I'd taken on the audit team, we'd
 22 taken on the audit team, I'd taken on the losses
 23 policy and had to learn a lot about
 24 subpostmasters, which I already knew, but in
 25 a way, learn about the behaviour of
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1 subpostmasters that was definitely non-criminal,
2 that involved losses. And, obviously, for one
3 reason or another, quite a lot of subpostmasters
4 suffered losses on their balancing night, and
5 frequently, these were losses that would come
6 back. They had accidentally handed a cheque
7 back when they were taxing something a vehicle,
8 and perhaps taxing a large number of HGVs, which
9 could run to tens of thousands of pounds. These
10 sorts of things happened all the time and, if
11 they were able to say, "I know there this loss
12 is" to the NBSC, then they could record it.

13 There were some subpostmasters whose
14 attention to detail was not sufficient and who
15 ran up quite a lot of losses, large or small,
16 and tended to find ways to get them put into the
17 suspense account and then leave them there.
18 And, you know, and need to be chased to get them
19 cleared and that was an onerous job for the
20 Retail Line. And all I was suggesting was that
21 some people, without the control of having to
22 explain to the NBSC how the loss had occurred,
23 would be more likely to make use of that
24 facility and therefore cause work, more work for
25 somebody.

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1 likely to be somehow in the domain of the
2 subpostmaster.
3 **Q.** Therefore, the subpostmaster should take out
4 a loan on the credit card to pay for it?
5 **A.** No, what I'm saying there is there was a real
6 problem with subpostmasters that had been
7 building up for many years. If you went back
8 20 years before this, it was a very remunerative
9 job, you know, business, owning a subpostmaster
10 and, over the years, as things like pensions had
11 gone into bank accounts and the DWP had stopped
12 paying unemployment benefit through Post Offices
13 and giro cheques weren't paid through post
14 offices, the remuneration to subpostmasters had
15 gone down and down and down and I was very
16 sympathetic to them about this and they had
17 gone -- it had gone from being a business where
18 they could absorb losses if they happened,
19 because their income from the business was very,
20 very significant, to a business where they were
21 basically running sub post offices, in many
22 cases, as a means of attracting customers into
23 their other private business. And their margins
24 were much narrower.

25 So I think we had had a number of

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1 **Q.** Why would the overall project result in errors
2 that would be even more clearly the fault of the
3 agent?

4 **A.** I -- I mean, that's not good wording on my part,
5 clearly. I think the point, essentially, was
6 I was still buying the line that we would have
7 fewer errors -- well, I mean, essentially, Post
8 Office Limited didn't make a great many errors
9 itself that impacted upon subpostmasters, in
10 what you might call the manual environment.

11 There were challenges to remittances from
12 time to time so, if we remitted £10,000 to
13 an office and they said they'd received £5,000,
14 that would be a matter for debate and
15 negotiation, except for the fact that around
16 about the same time, we'd automated the cash
17 centres, so we actually knew exactly what we had
18 sent out, there was a video record of it, so we
19 were sort of engineering errors out of our own
20 supply chain and, therefore, my belief at the
21 time was that hopefully the number of errors
22 would go down, but the responsibility for those
23 errors should not be Post Office Limited's. We
24 should be running a very tight ship and,
25 therefore, if errors occurred, they're more

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1 discussions about, you know, the people who
2 owned the subpostmasters' contract did not want
3 to change the contract and the liability within
4 the contract. So a method had to be found to
5 enable the agents to manage any losses that were
6 their liability, without it impacting too
7 seriously or too immediately upon them and their
8 business. So the possibility of, in inverted
9 commas, a loan (at some level of interest), was
10 one possibility and, as I say, I wasn't
11 particularly comfortable about what the NFSP had
12 suggested about allowing the use of credit
13 cards, because, you know, I'd seen in other
14 areas, ways in which people had got themselves
15 into trouble with credit cards. But it was
16 a means by which subpostmasters could possibly
17 have dealt with their losses.

18 **Q.** Last topic please. Can we have on the screen
19 HOCO0000001, please. Thank you. I'm going to
20 ask you a series of questions now about the
21 repeal of Section 69 of the Police and Criminal
22 Evidence Act 1984. This is a letter written in
23 1995, July 1995, from the Post Office to the Law
24 Commission. What function were you performing
25 in at this time, July '95?

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1 A. I was probably the regional manager for South
2 East Region in the Post Office Security
3 Investigation Service, I think, at that time.

4 Q. I think you would have been aware of the fact,
5 then, that Section 69 of PACE covered or
6 governed the admissibility of computer evidence
7 in court proceedings --

8 A. Yeah.

9 Q. -- and that such evidence was only admissible in
10 criminal proceedings if it could be shown that
11 there were no reasonable grounds for believing
12 that the evidence was inaccurate because of
13 improper use of the computer --

14 A. Indeed.

15 Q. -- and, at all material times, the computer was
16 working properly or, if not, that any aspect of
17 the computer that was not working properly did
18 not affect the production of the evidence. I've
19 summarised it.

20 If we can scroll down, please. We see that
21 the letter is written by the Post Office's Head
22 of Criminal Law division and, in their third
23 paragraph, they say:

24 "In practice, the operation of Section 69 of
25 the 1984 Act is somewhat onerous from
161

1 statement.

2 Q. What trouble did you have in finding such
3 a person?

4 A. It was -- I can remember, with the Department of
5 Employment, producing a document, producing
6 a schedule for us and, you know, when quite
7 properly, probably I think the same lawyer,
8 asked for a Section 69 statement, spending
9 a very long time chasing them to find a person
10 who felt that they were technically competent to
11 give that statement. So --

12 Q. So when Horizon was introduced in 1999 and you
13 were Head of Security, presumably you turned
14 your mind to how on Earth are we going to find
15 a person that can give us a Section 69
16 certificate --

17 A. I think that was --

18 Q. -- or statement --

19 A. Yeah, I mean, I do think that was one of the
20 things that had already been addressed by one of
21 the people in my team who'd been involved in
22 discussions with Fujitsu.

23 Q. Who was that?

24 A. Who was the person?

25 Q. Yes.

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1 a prosecution viewpoint. I consider that
2 computer evidence is, in principle, no different
3 from any other sort of evidence and it should,
4 in general terms, be admissible so that any
5 argument in Court would relate to its weight
6 rather than its admissibility. I therefore
7 consider that there should be a presumption that
8 the machine is in working order, etc, and that
9 if the Defence wish to argue otherwise, then
10 clearly, they should be able to do so. At
11 present, I therefore consider the evidential
12 requirements to be far too strict and can hamper
13 prosecutions."

14 Did you have any involvement, whether as
15 part of a review, a survey and obtaining of
16 opinions, amongst investigators, that led to
17 this view being expressed?

18 A. I don't think I did, no. No.

19 Q. Is it a view that you would have agreed with as
20 an investigator?

21 A. I think, generally -- I think certainly at the
22 time -- because the big problem as
23 an investigator that we always had with
24 Section 69 was finding somebody who knew enough
25 about a computer to be able to give that
162

1 A. I think Tony Utting had been involved in that.

2 Q. What had been the product of his involvement in
3 that issue --

4 A. Well, I think we had at least one person who was
5 listed as a competent authority to give such
6 a statement, both, you know, when Section 69 was
7 in place, and if we required a statement in
8 future, post-Section 69, regarding the good
9 operating of the -- the good operation of the
10 Horizon System.

11 Q. Did you know who that person was?

12 A. Not at the time. I mean, I think I could tell
13 you now that it --

14 Q. Who is the person you understand it to be?

15 A. I understand it to be Gareth, is it, Jenkins?

16 Q. There is a person called Gareth Jenkins, yes?

17 A. I think that's the person but, I have to say,
18 I've sort of picked that up so it might be
19 a false memory, as it were, that I've picked up
20 from going through the documents that I've
21 needed to go through for my statement.

22 Q. I just want to press you on that a little, then.
23 When you took over in 1999, you are saying that
24 Mr Utting had gone through a process of
25 establishing how --

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1 **A.** Let me step back, sorry. A person within the
 2 team, so I would rather not say it was Mr Utting
 3 because I don't know for sure. But within the
 4 team, that aspect of things was already in hand
 5 and I believe that we had a touch point, contact
 6 point, within Horizon. And I think, again, it
 7 would be wrong for me to firmly say that
 8 I thought it was the individual, Gareth Jenkins,
 9 that I named. So all I can say to you at this
 10 point in time is that it had been dealt with in
 11 the team, it was something which was not
 12 problematic, but I --

13 **Q.** What was your understanding of how it had been
 14 dealt with in the team?

15 **A.** Well, that we had made clear what the
 16 requirements of Section 69 were to, as they were
 17 at the time, ICL Pathway, and that ICL Pathway
 18 had made clear that they had a person who were
 19 able to provide that statement.

20 **Q.** What involvement did you have in this? Did you
 21 see any material --

22 **A.** No.

23 **Q.** -- that established that the Post Office had
 24 made clear to ICL Pathway what the requirements
 25 of Section 69 were and had been in turn told by

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1 different because, you know, there were so many
 2 amateur, if I can use that term, amateur
 3 experts, if you will, in IT generally, even in
 4 quite large businesses. It was the person who
 5 had a Sinclair ZX80 at home, who became the
 6 first person to look after the first computer
 7 and seemed to kind of morph into the person in
 8 charge of IT. And when you tried to kind of get
 9 a proper statement, a Section 69 statement from
 10 that person, they were unable to effectively
 11 describe why they should be the person giving
 12 it. So it was problematic.

13 **Q.** Section 69 of PACE was repealed on 14 April
 14 2000 --

15 **A.** Yes.

16 **Q.** -- by the enactment of the Section 60 of the
 17 Youth and Criminal Justice Act 1999 and the
 18 effect of that appeal was that the common law
 19 presumption became applicable, namely
 20 a presumption that the computer producing the
 21 relevant evidential record was working properly
 22 at the material time. The effect of this was to
 23 shift the burden, such that an evidential record
 24 was automatically admissible unless evidence
 25 that was admissible could be produced to the

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1 ICL Pathway how those requirements were going to
 2 be satisfied?

3 **A.** No. I don't remember seeing any such
 4 documentation and, again, I'm going to say that
 5 I would only expect to see documents like that
 6 in a situation where there was a problem, not in
 7 a situation where everything appeared to be
 8 going forward as it should do.

9 **Q.** So you would agree with the general view
 10 expressed in the second part of this letter that
 11 the evidential requirements of Section 69 were
 12 too strict and could make it difficult to
 13 prosecute?

14 **A.** Look, I think I would definitely -- I mean, this
 15 is again the benefit of hindsight. I think
 16 I would definitely agree with the second part of
 17 that statement. That it certainly was, from
 18 an operational perspective, hard work sometimes
 19 getting a person to come up with -- or finding
 20 the right person to provide that evidence.
 21 Whether I would say now -- I don't think I would
 22 say now that they were too strict. I think it
 23 was probably a good discipline.

24 I think even at the time I probably thought
 25 it was quite a good discipline. It was just

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1 contrary.

2 Was the effect of all that, the repeal of
 3 Section 69, to enable the Post Office more
 4 easily to prosecute subpostmasters?

5 **A.** No, I don't think it was to make it -- to enable
 6 the Post Office more easily to prosecute
 7 subpostmasters because, as I say in this case,
 8 I firmly believe that we would have been given
 9 the necessary Section 69 statement if we asked
 10 for it. And we would ask for it in the belief
 11 that, if it were given, with the certificate at
 12 the top of the statement, from the person saying
 13 that if they said in it anything which they knew
 14 to be false or did not believe to be true, they
 15 could be prosecuted, that that would be
 16 a sufficient preventative to them saying
 17 anything to us that they knew to be false or
 18 didn't believe to be true.

19 So I don't think it particularly helped us.
 20 I think that when the Head of Criminal Law
 21 Division sent that view in to the Law
 22 Commission, I don't think that he was at
 23 variance with any of the other prosecuting
 24 authorities in the country, really. And it may
 25 have made life simpler in some other areas of

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1 Royal Mail, perhaps. But it didn't actually,
2 materially alter our ability to use evidence
3 from Horizon.

4 **MR BEER:** Mr Marsh, thank you very much. Those are
5 the only questions that I ask.

6 I think there are some questions from the
7 Hodge Jones & Allen team and some questions from
8 Howe+Co team. So I think Hodge Jones & Allen
9 first, please.

10 So if you just wait there, there will be
11 some more questions.

12 **Questioned by MS PAGE**

13 **MS PAGE:** Mr Marsh, I act for number of the
14 subpostmasters and the first thing I would like
15 to do is ask if we could have document
16 WITN05970148. This document, when it comes up,
17 is an agenda for, as we can see, the Horizon
18 management of security in the live environment.
19 As far as I know, we don't have minutes for this
20 meeting, so we only have this rather skeletal
21 description of it but, as we can see, you're
22 invited to it and we can also see that a number
23 of other people are invited to it which you may
24 be able to help us with: Len Clay?

25 **A.** Worked for me, was a technical physical security
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1 connection with quite a lot of IT sort of
2 issues. Business Service Management: can you
3 tell us what you think he was doing at that
4 time?

5 **A.** Yeah, I'm guessing -- I might be mixing him up
6 with somebody else. I thought he was something
7 to do with the NBSC, to be honest, but Business
8 Service Management, I think, probably may well
9 have sat within the NBSC and it was just about
10 making sure that everything was in place
11 necessary to keep post offices running.

12 **Q.** Right. Well, John Meagher and Jeremy Folkes, we
13 can see, are both people who were in Horizon
14 product assurance.

15 **A.** Yeah.

16 **Q.** Indeed, we've heard from Jeremy Folkes that he
17 was involved in trying to ensure that Horizon
18 data would meet POL's prosecution requirements?

19 **A.** Oh, right, good.

20 **Q.** Yes.

21 **A.** Yeah.

22 **Q.** If we go down, we can just see in very broad
23 terms, I think, what the meeting was about. It
24 says understanding "Work areas":

25 "Security Incident Management (including
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1 expert.

2 **Q.** Derek Pratt?

3 **A.** Almost certainly the person I ought to have
4 named rather than Tony Utting, I suspect, when
5 I talked about the person who had involvement
6 with Horizon.

7 **Q.** When you say had involvement with Horizon --

8 **A.** Well, sorry, we'll see when we look at this.

9 I haven't seen this before -- well, I haven't
10 seen it since 1999 but Derek Pratt worked for me
11 and was the leader of my admin team but was
12 himself an experienced investigator.

13 **Q.** When you referred to Horizon issues, were you
14 talking about exactly what you've just been
15 talking about with Mr Beer?

16 **A.** Yeah, I mean, again, I couldn't say for sure.

17 Let's see what it says in this note here but it
18 may well be it was Derek Pratt rather than Tony
19 Utting or may well be a third person.

20 **Q.** Then we've got David McLaughlin. Do you
21 remember that name?

22 **A.** David I knew, and David worked for me many years
23 later. I'm not quite sure what he was doing
24 then, but yes.

25 **Q.** Then Dave Hulbert is a name we've heard in
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1 liaison with/escalation from Pathway).

2 "Security Compliance (eg physical security,
3 cryptographic security etc).

4 "Ongoing risk assessment ...

5 "Liaison with other [Post Office] security
6 interests and other authorities (eg threat
7 assessments ...)

8 "Security viewpoint for Change Management.

9 "Staff Vetting (for ICL Pathway).

10 "Fraud Investigations interface.

11 "Security 'point of contact' for Pathway."

12 **A.** Yes.

13 **Q.** So it seems to be covering quite a range of
14 Horizon Issues and, in particular, fraud
15 investigations interface suggests, does it not,
16 some discussion around the getting hold of --

17 **A.** It certainly suggests the sort of discussion
18 that Mr Beer and I were just talking about, in
19 terms of who made contact with Horizon to get,
20 amongst other things, a Section 69 statement,
21 yes.

22 **Q.** So maybe a Section 69 statement but also the
23 kind of material that would underpin the
24 Section 69 statement?

25 **A.** Yes.

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1 Q. In other words, the very evidence that you were
2 going to rely on for Horizon?
3 A. Yes.
4 Q. So it looks as if here at least, you were indeed
5 involved in those discussions. It's somewhat in
6 contrast, would you not say, with what you told
7 us earlier with not really understanding
8 anything about the ARQ process or what that was
9 about.
10 A. I'm going to just say, if you just roll up the
11 document for a moment, you'll see that this
12 document refers to a meeting less than a month
13 after I arrived at Post Office Limited, and, you
14 know, I was going to about half a dozen meetings
15 a day about things all -- about a lot of things
16 that I was trying to get a grip on. This was
17 only one of them.
18 At this time I don't think that Horizon had
19 started to roll out other than on a test basis.
20 You know, I am sure I was there and I'm sure,
21 while I was in that meeting, I paid attention
22 and I'm sure that I delegated both to Len Clay
23 and Derek Pratt as appropriate, and to other
24 people from outside. I don't remember anything
25 about it and I don't remember terms that were
173

1 if there's anything I can do to help, I want to
2 do it. I mean, this is a dreadful situation.
3 It's a dreadful situation. I feel that it is
4 a dreadful situation to have been involved in,
5 even unknowingly, so if I could help you,
6 I would help you. But I -- it's not as though
7 I could even make -- you know, you've heard me
8 say I'll try to make some assumptions or
9 suppositions to Mr Beer to help fill in the
10 gaps. I can't with this.
11 It was at a point in my joining Post Office
12 Limited or Post Office Network when I just had
13 a vast amount of other things going on and I'm
14 not trying to distance myself from it.
15 Q. Thank you. That document can come down.
16 Have you listened to the Human Impact
17 evidence on the way people were treated by your
18 investigators?
19 A. I have listened to some of it, not all of it,
20 yes.
21 Q. Well, I'm going to go through one account with
22 you because it dates from 2001 so it was
23 an investigation that happened on your watch.
24 If we could have INQ00001035, please.
25 A. I probably have read this one, this is --
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1 used then.
2 And certainly Horizon, because it wasn't
3 an immediate issue at that time, was something
4 that I made sure that other people were properly
5 dealing with because this is -- it sounds like
6 an excuse -- when I came into Post Office
7 Limited as the new Head of Security, the
8 previous Head of Security had gone sick about
9 three months earlier, nothing whatsoever had
10 happen during that three-month period,
11 I literally walked into a room full of filing
12 cabinets, no form of handover at all, and I was
13 working very hard to pick up on what was going
14 on, on a much wider basis than Horizon.
15 So I really apologise for not being able to
16 give you the level of detail you might wish, but
17 I wasn't sort of hiding anything when I said
18 I -- none of these things meant anything to me.
19 Horizon was one of those things that I delegated
20 to others to deal with because I had, at that
21 time, more urgent issues coming up.
22 Q. Is it a case of distancing yourself from
23 something which has become a burning platform?
24 A. Seriously, it's not. I mean, I said to many
25 people on the Inquiry over the last few months,
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1 Q. Tracy Felstead's?
2 A. That's right, yes.
3 Q. If we go to page 4, then when we get to page 4
4 if we scroll down to page 14 on the internal
5 numbering, thank you. I'll just read from
6 line 22, and this is about the interview that
7 she had:
8 "What did they ask you and what did you
9 say?"
10 This I the question being put to Tracy
11 Felstead:
12 "They asked me where the gone had gone, what
13 I'd done with the money. Never at any stage was
14 it, 'What do you think has happened, was there
15 any reason for this to happen?' It was very
16 much that I was being asked constantly what have
17 I done with the money, "Where has the money
18 gone?" I was being accused from day dot.
19 "Question: What did you say?
20 "Answer: There wasn't much I could say,
21 apart from I don't know where the money's gone,
22 I don't have the money. How do you explain
23 something if you don't understand it yourself?
24 "Question: Did something else then happen
25 involving the Post Office a little while after
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1 the interview with the two Post Office
 2 employees?
 3 **"Answer:** Yes. So then I was put on leave.
 4 I was asked to leave the Post Office. I was
 5 suspended while there was further investigation,
 6 I was told, taking place. And then it was a few
 7 weeks after at -- it was -- I can't even
 8 remember the time, really early in the morning.
 9 I was staying at my mother-in-law's and the
 10 door -- I wasn't actually there but I had
 11 a call. I'd gone out early that day with some
 12 friends and the Post Office investigators were
 13 at my mother-in-law's door with two police
 14 officers to take me to the local police station
 15 to interview me.
 16 **"Question:** Which was Peckham, I think,
 17 wasn't it?
 18 **"Answer:** Yes, Peckham police station, yes.
 19 **"Question:** Were you taken to Peckham police
 20 station?
 21 **"Answer:** I wasn't there at the time, but
 22 I gladly went to Peckham police station of my
 23 own accord and, at this stage, I then asked for
 24 legal representation because, obviously going to
 25 a police station is -- you know, I thought 'This
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1 had gone. I couldn't explain anything and I was
 2 just constantly being asked, 'Did you pay for
 3 your family to go on holiday? What did you
 4 spend the money on?' And it just kept going on
 5 and then, in the end, my solicitor said, 'Just
 6 say "no comment"' because they're not asking
 7 questions, they're just interrogating me.
 8 **"Question:** When the Court of Appeal came to
 9 look at the matter all those years later in
 10 April 2021 in its judgment, the Court of Appeal
 11 records that your record of interview says that
 12 you were asked questions including 'Can you
 13 demonstrate how you did not steal the money?'
 14 **"Answer:** Yes.
 15 **"Question:** Do you remember those kinds of
 16 questions?
 17 **"Answer:** Yes.
 18 **"Question:** You were asked whether you could
 19 satisfy the officers that you didn't have
 20 responsibility for the £11,000 that was said to
 21 be missing?
 22 **"Answer:** Yes.
 23 **"Question:** So you were being asked to prove
 24 how you had not committed a crime?
 25 **"Answer:** Yes."
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1 is serious now'.
 2 **"Question:** It had escalated?
 3 **"Answer:** It had, yes -- very quickly.
 4 **"Question:** Can you remember -- were you
 5 interviewed at the police station?
 6 **"Answer:** I was.
 7 **"Question:** I don't think you were arrested,
 8 were you?
 9 **"Answer:** No, I weren't, no.
 10 **"Question:** You were interviewed under
 11 caution voluntarily?
 12 **"Answer:** Yes, I was interviewed. The
 13 police had nothing to do with this. I was
 14 interviewed by the same two investigating
 15 officers from the Post Office.
 16 **"Question:** By the same two you, mean the
 17 ones from a few weeks before?
 18 **"Answer:** The ones from the previous
 19 interview, yes.
 20 **"Question:** What was the interview like?
 21 **"Answer:** It was horrendous. The only way
 22 I can explain it is that I felt bullied. There
 23 was no -- I was a young girl. I was in a police
 24 station. I couldn't justify where this money
 25 had gone because I didn't know where the money
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1 What do you make of that?
 2 **A.** It sounds like a very difficult and unpleasant
 3 experience for a person who at the time was
 4 a very young individual, and this is one of
 5 those cases where I did ask if any of the case
 6 papers were available so I could -- I thought it
 7 might come up and I wanted to look at it to see
 8 if I could understand the context.
 9 I mean, I can understand a certain context
 10 here because, from the way it's articulated, it
 11 sounds as though a stock that this lady had been
 12 working from had been put away, recording
 13 a certain amount of money in it, and when the
 14 officer in charge took that stock out for
 15 somebody else to use, which the person may not
 16 have expected to happen, there was less money
 17 than was recorded there. The amount of money
 18 was necessary to make it balance.
 19 This was an offence that happens from time
 20 to time and it's an example of one of the few
 21 offences where we don't tend to have -- well,
 22 not so much corroboration -- we don't tend to
 23 have a series of events. We just have the one
 24 event. Well --
 25 **Q.** Well, I can help you with that. This offence
 180

1 arose from Horizon losses which had developed
2 between December 2000 through to February 2001.
3 **A.** I'm sorry, let me change my language there.
4 What the investigators thought they were dealing
5 with at that time looked like an offence that we
6 have dealt with in the past before Horizon
7 existed, where a person had taken money out of
8 a till, put it away in the safe expecting a week
9 or two later when they came back from holiday
10 that they would be the person to take that till
11 out and being caught out by it being used by
12 somebody else.

13 I think, from the way that reads, they did
14 not behave as I would have wished them to behave
15 because they were dealing with a very difficult
16 interview where, essentially, there was one
17 single event and they would basically say to
18 a person "There is no other explanation that we
19 can come up" --

20 **Q.** Well, there wasn't one single event. That's my
21 point. These were Horizon losses which
22 developed over a number of months?

23 **A.** That's not how I read it. How I read it was
24 that the fundamental issue is that a till was
25 put away, recording, for example, £30,000 in it,
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1 Horizon and that they were, frankly, bullying
2 and expecting somebody to disprove that they'd
3 committed a crime?

4 **A.** I don't think I can accept responsibility for
5 the fact that we did not know about the problems
6 with Horizon. I will accept responsibility for
7 the fact that I clearly had investigators
8 working for me who did not behave with the sort
9 of -- or did not treat the suspect with the
10 respect and care that she deserved. So I accept
11 that people working for me behaved
12 inappropriately with the suspect.

13 I don't honestly think we -- we knew nothing
14 about Horizon, so I cannot -- you know, we were
15 dealing with a case which I believe the
16 investigators thought they understood but they
17 went about investigating it in a way that was
18 inappropriate.

19 **Q.** Thank you. That document can come down.

20 In your annual reports on the numbers of
21 prosecutions, did you break down prosecutions so
22 you'd be able to see how many prosecutions were
23 of subpostmasters?

24 **A.** Yes.

25 **Q.** Did that number go up or down over the years you
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1 and when it was taken out, not by the lady who
2 put it away, it only had --

3 **Q.** That's simply not what happened. That's not
4 this case.

5 **A.** Sorry, I must have misread these -- whatever
6 happened -- listen, whatever happened, that does
7 not sound like --

8 **SIR WYN WILLIAMS:** Hang on, excuse me both of you.
9 I don't think we can, in effect, delve into the
10 particular factual circumstances which happened
11 so long ago. The plain fact is that the Court
12 of Appeal quashed this conviction because it was
13 a Horizon case, Mr Marsh, all right?

14 **A.** I absolutely agree, sir.

15 **SIR WYN WILLIAMS:** So I just don't think it will
16 help me for you to try and explain why the
17 investigators may that have adopted the line
18 they did. The complaint is simply that they did
19 adopt that line.

20 **A.** And other than try to provide context, sir, all
21 I can say is I accept that, and they should not
22 that have done, and I apologise.

23 **SIR WYN WILLIAMS:** Right, fine.

24 **MS PAGE:** Do you accept responsibility for the fact
25 that your investigators were so unprepared for
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1 were in charge?

2 **A.** It certainly -- it went up over the year, the
3 years when I was in charge, compared to the few
4 years prior to that, because there had been
5 three years prior to my taking over, when POID,
6 my old central team, had stopped investigating,
7 we had -- we were not investigating, we'd handed
8 some investigators over to Post Office Counters
9 limited and, within Post Office Counters
10 Limited, there had been a degree of laxity and
11 one of the ways in which that demonstrated
12 itself was people just not getting on
13 investigating cases.

14 So the numbers that were investigated and
15 prosecuted after I arrived, the higher numbers,
16 has more to do with the lower numbers before
17 I was there. And you will see -- and I'm not
18 sure I necessarily trust the numbers that have
19 come out. I think there has been a lot of data
20 lost over the years but there appears to be
21 a dip shortly before 1999 when we took over --
22 you know, I think, again, an improvement in the
23 efficiency of the investigation team, from
24 around about 2001, after we changed the
25 structure again, and made it a national team of
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1 investigators.

2 And I recognise that my national team of
3 investigators were working without all the
4 information they needed to do their job properly
5 but they were doing their jobs properly and
6 professionally as they understood them at that
7 time and that, I think, would be why the numbers
8 may have increased.

9 **Q.** Did they increase between 2000 and the later
10 years, as more post offices became Horizon post
11 offices?

12 **A.** I don't think so. I mean, I haven't got the
13 data in front of me at the moment. Do you think
14 so?

15 **Q.** Because, as a sort of a curious person, you
16 might wonder, mightn't you, whether an increase
17 in investigations and prosecutions during that
18 time was a consequence of Horizon?

19 **A.** I mean, I genuinely think -- but the data that
20 the Inquiry were able to share with me, which
21 was very partial, it doesn't support this
22 position but I actually think we reached a sort
23 of a level in 1999, 2000, 2001, and that was
24 based on the number of investigators I had.
25 From that point onwards, I was subject, as
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1 being drawn on those Freedom of Information Act
2 replies, in part because of acknowledgements
3 within some but not other of the replies, that
4 the data particularly pre-1999 was incomplete
5 and unreliable, and as to variants between
6 whether the number of investigations brought was
7 the relevant figure, and the number of
8 convictions obtained was the relevant figure.

9 Additionally, the Inquiry had previously
10 written to the Post Office asking for
11 compendious data on this issue, and we're
12 presently waiting in an evidential form, namely
13 via a witness, some evidence on this very issue,
14 because we thought it was unsafe to proceed on
15 the basis of data that appeared to be inaccurate
16 or incomplete.

17 The second reason for intervening is that
18 this wasn't one of the HJA questions for which
19 permission was sought, less still granted, so
20 I think it's probably best, for both of those
21 reasons, that this comes to an end now.

22 **MS PAGE:** Thank you, Mr Beer.

23 I'll move on then. The last question is
24 this: you say that the aim of your
25 investigations was for all cases to be fully and
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1 everybody else in Post Office Limited was, to
2 regular headcount reductions, 10 per cent here,
3 20 per cent there. We had fewer and fewer
4 investigators. The evidential requirements to
5 take cases to court always increased, they never
6 decreased. So the time it took an investigator
7 to put a case together, you know, it was longer.

8 So I think, actually, if we had all of the
9 numbers we would see the numbers of prosecutions
10 overall dropped off.

11 **MR BEER:** Sir, can I intervene --

12 **SIR WYN WILLIAMS:** Yes.

13 **MR BEER:** -- can you see and hear me -- on two
14 bases?

15 Firstly, Mr Whittam, on behalf of Fujitsu,
16 asked a series of Rule 10 questions, questions
17 pursuant to Rule 10, having produced some
18 Freedom of Information Act replies that the Post
19 Office had given over the years. There were
20 five of them and a transcript of evidence or
21 submissions of Mr Altman Queen's Counsel in the
22 Court of Appeal Criminal Division, also giving
23 some information as to numbers of prosecutions.

24 That data appeared in conflict internally,
25 ie no safe conclusions to us appeared capable of
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1 fairly investigated and to gather all evidence
2 whether in support of the allegation against it
3 or in mitigation. That's something that Mr Beer
4 has already taken you to in your statement.

5 **A.** Absolutely.

6 **Q.** And what we do know from the pattern of
7 prosecutions over the years, including the years
8 that you were in charge but also subsequently,
9 is that investigators in your department would
10 gather the evidence which supported the
11 allegation from Horizon, the ARQ data, but they
12 would not gather any evidence which might show
13 that Horizon was not robust, such as evidence of
14 flaws or defects, even if that was explicitly
15 raised, as it was in many cases.

16 So in many cases, it seems that your
17 investigators abjectly failed in their aim that
18 you stated for them; would you accept that?

19 **A.** I have no evidence before me about the -- about
20 investigators failing to take account of
21 information on bugs or system errors. If that
22 is the case, there could be no doubt that they
23 did not fully and fairly investigate the
24 allegations that they were looking at.

25 So all I'm saying is, I haven't seen
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1 anything within any of the documents that I've
2 been shown, and I have no personal experience
3 of, you know -- I have not been told that before
4 now. If it is the case then they did not too
5 their jobs properly. That is true.

6 **MS PAGE:** Thank you. Those are my questions.

7 **SIR WYN WILLIAMS:** Thank you, Ms Page. Is it
8 Mr Stein or Mr Jacobs?

9 **MR STEIN:** Mr Stein, sir.

10 **Questioned by MR STEIN**

11 **MR STEIN:** Mr Marsh, I represent a large number of
12 postmasters and mistresses and I'm instructed by
13 a firm called Howe+Co. I'm going to take you
14 back to a document that you've looked at. It
15 has a reference POL00088867. Page 1 of that
16 document, please. Now, you looked at this
17 document with Mr Beer and, if we just centre
18 ourselves on it. We've got the date about the
19 fourth line down, which is September 2003, and
20 it says there, "Replaces all previous versions";
21 do you see that, Mr Marsh?

22 **A.** I can.

23 **Q.** Okay. We know the author of this, who gave
24 evidence yesterday, and we know the owner is
25 yourself. If we just scroll down a little bit

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1 **Q.** What's the point of having this document if it
2 doesn't go to the people you've just mentioned,
3 which are the branch -- the SPM line managers?

4 **A.** By this time, documents like this tended to be
5 held centrally on the intranet and they were
6 there for people to consult, so I'm really only
7 sort of raising the point that rather than go
8 to, people went to it.

9 **Q.** All right. Well, thank you for, I think,
10 defending the line managers. The agents. Who
11 is next? Who are the agents?

12 **A.** Well, it's hard to say really. I wonder if that
13 should read "Retail Line [comma]" -- well, it
14 does read "Retail Line [comma] Agents", but
15 I wonder, essentially, if what it means is the
16 Retail Line for agents because I'm sure that we
17 would not have specifically shared this
18 document -- there was no mechanism to share this
19 document with agents, ie -- agents are
20 subpostmasters.

21 So agents are a subpostmaster of
22 an individual sub office or the nominee
23 subpostmaster of a large number of officers,
24 they're all referred -- they were all referred
25 to as agents at the time. But my suspicion

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1 further we see then the "Audience", and I want
2 to go through -- I'm sorry, my fault. Under
3 "Audience" back up the page, very grateful.

4 So next to "Audience", we've got:

5 "Retail Line, Agents, NBSC, Transaction
6 Processing, Finance, Security Personnel."

7 Just help us a little bit further in
8 relation to this document. Who is the Retail
9 Line?

10 **A.** The Retail Line are the management of all Post
11 Office branches, I guess at every level right up
12 to the Director of Network, Network Director.

13 **Q.** Right, okay. So it goes to all branch managers?

14 **A.** I don't necessarily know whether the document
15 will have been -- no, no, no, not branch
16 manager, sorry. The next level up. So the
17 managers of the managers of branches and the
18 Retail Network Manager, who would be the contact
19 point for subpostmasters. But I wouldn't say it
20 necessarily goes to all of them. When we say
21 "audience" what we mean, essentially, it's being
22 written with the expectation that they may read
23 it or need to read it.

24 **Q.** So it goes to them?

25 **A.** Well, it could go to them, yeah.

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1 there is that should perhaps have been "[hyphen]
2 agents" or "[colon] agents", or something like
3 that. Because we wouldn't have been sharing
4 this document with agents and there wouldn't
5 have been a mechanism for them to access it.

6 **Q.** Why not share this with subpostmasters? What's
7 the problem in this --

8 **A.** I don't think there would be a problem with it,
9 I just don't think that there was a mechanism
10 for it to happen.

11 **Q.** What you've just said, you don't think you would
12 have shared it, so what's the problem in sharing
13 this?

14 **A.** I'm not saying there was a problem. I'm merely
15 saying, rather like saying the audience could go
16 to it, rather than it going to them, I don't
17 think agents would have had the mechanism to go
18 to it because it would have been held on
19 an intranet within the Post Office IT system,
20 which the agents themselves didn't have access
21 to.

22 **Q.** To let's try it again. It's your evidence,
23 Mr Marsh. You're the one saying you don't think
24 this would have gone?

25 **A.** Yeah.

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1 Q. What's the problem? Why shouldn't
2 a subpostmaster have an interest in reading this
3 particular document?

4 A. Just to be absolutely clear, I am not saying
5 they shouldn't, I am trying to explain that
6 I don't think they would have because I cannot
7 picture, at that time, that there would be
8 a mechanism to do so. So I'm not saying we
9 would have prevented them from having access,
10 just that I don't want you to think that every
11 agent in the country would automatically have
12 received a copy of this as soon as it was
13 assured.

14 Q. You don't think, as an example, that
15 a subpostmaster should be told very directly, by
16 essentially its boss, the subpostmaster's boss,
17 that they're going to be held liable for all
18 losses, whether it's a system fault or not? You
19 don't think they should just be told that?

20 A. Whether I think that or now, I'm trying to
21 explain to you what I think happened at the time
22 and I don't think they would have had this
23 policy document shared directly with them.

24 Q. At the time, let's just unpack that. At the
25 time, which is 2003, what would have been the
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1 operated by Fujitsu; is that correct or not?

2 A. Are we talking about the Horizon System
3 Helpdesk?

4 Q. Yes.

5 A. What I said, and I'm in the same position now as
6 I was then, is I don't know whether the HSH was
7 operated by Fujitsu or by Post Office Limited.

8 Q. How long were you in post?

9 A. I was in post for six and a quarter years.

10 Q. At no time did it cross your mind to figure out
11 the answer to that question: who on earth is
12 operating this helpline?

13 A. I wasn't responsible for the helpline and,
14 again, it was one of those things I had not
15 heard at the time -- and, indeed, I don't know
16 whether it is the case that there was anything
17 problematic with the helpline but it was way
18 outside of my area of responsibility.

19 Q. Okay. Transaction Processing.

20 A. Yes.

21 Q. Who is that?

22 A. It is a team of people in Chesterfield who
23 literally do what it says. So from 19 -- or
24 from prior to 1999, what they were doing was
25 a very manual job where they were literally
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1 problem in just telling subpostmasters the exact
2 contents of this document?

3 A. None whatsoever.

4 Q. Right. There was no provision though, as you
5 are making very clear, for them to be given
6 a copy of this document --

7 A. The provision could well have been via the
8 "Retail Line [hyphen or colon] Agents". But I'm
9 not able to tell you whether or not that
10 happened.

11 Q. Right. NBSC. You know what that means, don't
12 you?

13 A. The Network Business Support Centre.

14 Q. Right. Now, Network Business Support Centre,
15 that's the internal Post Office support centre
16 including a helpline; is that right?

17 A. That's the two-tier helpline at Dearne House
18 near Doncaster, yes.

19 Q. Right, okay, you were answering questions from
20 Mr Beer earlier about the different types of
21 Helpdesk and you appeared to be uncertain. So
22 you're aware of the Helpdesk that is operated by
23 the Post Office, yes?

24 A. Yes.

25 Q. You're also aware of a Helpdesk system that's
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1 taking bits of paper and collating them and
2 making sure that the right clients were settled
3 suitably, and that was something which gradually
4 migrated into the automated environment.

5 Q. I think we can imagine what finance means,
6 that's, essentially, the money team; is that
7 right?

8 A. That's the money team, yes.

9 Q. Okay. Security personnel?

10 A. Would be people working for me and their access
11 to this would have been via our own intranet
12 site and they would have been made aware,
13 I imagine, at the point when this was assured
14 that there had been an update to this policy.

15 Q. Help us understand a bit more. Your team, you
16 embody that as the Head of Security?

17 A. Yes.

18 Q. That covers investigations; is that correct?

19 A. At this point in time, I think this is probably
20 actually the version 2 in January 2004. At this
21 point in time, that would have included -- so
22 that would have been the investigation team, the
23 external crime team, the physical security team,
24 who were the technical experts, the audit team
25 under Martin Ferlinc, and then an admin team --
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1 oh, sorry, and a commercial security team, as
 2 well.
 3 **Q.** Right so this document is going out, either
 4 physically or on intranet, to all parts of the
 5 managerial system managing the subpostmaster
 6 system, it's going to the internal operated
 7 helpline from the Post Office and it's going to
 8 all of the security, in other words
 9 investigation staff, yes?
 10 **A.** Well, they are -- I think they're recognised as
 11 the audience. Then again it's not going to. It
 12 is available to and on the --
 13 **Q.** Assuming their doing their job, it is going to
 14 them and they are reading it?
 15 **A.** Yes.
 16 **Q.** Right, okay. We know that this is drafted by
 17 the Martin Ferlinc, National Audit and
 18 Inspections Manager. So it's got his group, if
 19 you like, involved as well?
 20 **A.** Yeah.
 21 **Q.** Right okay. So that's quite wide coverage of
 22 this particular policy going out at that time.
 23 And around this time, were you aware of the
 24 IMPACT Programme that was being put together by
 25 Ms Harding?

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1 does that sound right?
 2 **A.** Sorry, yes, I'm just finding that in the
 3 paragraph. Yes, absolutely, yes.
 4 **Q.** Okay, and it goes on to say:
 5 "If a known system error has caused
 6 a shortage, the agent should be given authority
 7 to hold the loss in suspense until the system
 8 error has been reconciled and an error notice
 9 issued."
 10 So if we put these two together, these
 11 two paragraphs, it says this: if an agent feels
 12 that an error has occurred via the Horizon
 13 System, it is essential that this be reported to
 14 the Horizon Helpdesk, the HSH.
 15 **A.** Yes.
 16 **Q.** We both agree, do we, that the HSH was operated
 17 by somebody?
 18 **A.** Yes, two groups of people, one of whom --
 19 **Q.** Exactly, there's the Post Office and then
 20 Fujitsu.
 21 **A.** That's right.
 22 **Q.** So it's likely to be one of those two, isn't it?
 23 **A.** One or other.
 24 **Q.** If we almost use a process of elimination, here
 25 it then says, in the second paragraph,

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1 **A.** I am now aware and I probably was at the time,
 2 and if you'd asked me this before the Inquiry
 3 contacted me, I wouldn't have been able to
 4 recall that but, yes, I'm aware now, I've seen
 5 documents.
 6 **Q.** Because it is around this time that she starts
 7 the programme of putting together what becomes
 8 the IMPACT policy, which is then implemented
 9 about 2005/2006?
 10 **A.** Yeah.
 11 **Q.** Okay. Now, can we go to page 8, please, of this
 12 document. Right.
 13 Section 6, Horizon losses. Now, you've gone
 14 through this with Mr Beer, I don't intend to
 15 repeat that. You can see the second paragraph
 16 that:
 17 "System faults are very rare [it says here]
 18 and are normally identified after full
 19 investigation has been undertaken."
 20 Now, the second paragraph goes on, the last
 21 couple of sentences:
 22 "If the agent feels that the issue is not
 23 being resolved, they should flag the issue up
 24 with the NBSC."
 25 Now, that's the help Post Office helpline;

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1 a reference to the NBSC, there are two groups of
 2 people, help people, that an individual SPM can
 3 report to --
 4 **A.** Yes.
 5 **Q.** -- if they feel there's a system error, yes?
 6 **A.** Yes.
 7 **Q.** So do we understand that this tells us that
 8 agents may have system errors?
 9 **A.** I think we were aware of the fact that there
 10 could be system errors and that there needed to
 11 be a process, and this is a not very good
 12 process, for reasons that we've already explored
 13 with Mr Beer, it's a circular process that
 14 doesn't seem to help subpostmasters in the way
 15 that it should have done.
 16 **Q.** Right. There's emphasis, isn't there, on the
 17 knowledge that there is the possibility of
 18 an error because of the last sentence:
 19 "If a known system error has caused a
 20 shortage, the agent should be given authority to
 21 hold the loss in suspense until the system error
 22 has been reconciled and an error notice issued."
 23 Yes?
 24 **A.** Absolutely, yes.
 25 **Q.** So that tells us two things: first of all, that

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1 there's acknowledgement there that system errors
2 can cause shortages, yes?

3 **A.** Yes.

4 **Q.** Yes. Secondly, that there needs to be a system,
5 therefore, for where system errors cause
6 a shortage and that is put the shortage in
7 suspense?

8 **A.** Yes.

9 **Q.** So it tells us those two things. Right.

10 Now, a number of answers to Mr Beer were
11 along the lines of, if you were aware of a first
12 bug in the system, then you'd have caused all
13 sorts of things to take place: you'd have made
14 sure there was an understanding what was
15 happening, checks maybe weekly, monthly, as to
16 what's going on in the system.

17 Now, this document in 2003 is talking about
18 known possible errors in the system, Mr Marsh.

19 **A.** It's talking about the possibility of them.

20 I mean, in a way, it is actually noting, as
21 I sort of -- as I said to Mr Beer -- or the
22 thing I said to Mr Beer wasn't in place, which
23 is a process, you know, for us to note system
24 bugs. I mean, it's not a good process but it's
25 a process. Essentially, there are two routes by
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1 investigations had taken place, because, had we
2 known about this at an early stage, yes, we
3 might have had to make an admission to the court
4 about a number of investigations leading to
5 prosecutions that had taken place, using
6 evidence that was not now considered to be safe,
7 but I would like to think -- I'd like to think
8 that, had this information come forward, we
9 would have been able to -- or Fujitsu would have
10 been able to do something to render that
11 information once again acceptable as evidence.

12 So I think, you know, not only -- the worst
13 of this is a great many people have suffered
14 injury, trauma and distress. But it's all for
15 such a stupid reason because, had this come out
16 as soon as somebody somewhere knew about it, we
17 were problem solvers, we would have got on and
18 solved the problem. So, in hiding it, they did
19 absolutely no -- they did damage to a lot of
20 people and no favours to anybody.

21 **Q.** Right. Let's go back to where we started. You
22 say you were interested in the fair
23 investigation and fair prosecution of
24 subpostmasters.

25 **A.** Yes.

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1 which a subpostmaster should have been able to
2 report system bugs which would have informed the
3 security team, amongst many others, and that's
4 either the Horizon System Helpdesk or the NBSC
5 and, as I have learnt, and obviously the Inquiry
6 learnt and the Appeal Court learnt sometime ago,
7 these processes did not work.

8 And so the belief that I held, in all good
9 faith, that nothing had been reported during the
10 time period that I was Head of Security, about
11 bugs and system errors -- well, I'm not saying
12 that anything necessarily had been reported but
13 it sounds as though we'd made it quite difficult
14 to report, and it only took the HSH and the NBSC
15 to not take note or possibly -- and I'm only --
16 well -- and, you know, to not take note of that
17 for these -- for this information not to find
18 its way through.

19 **Q.** You were interested in fairly investigating and
20 prosecuting --

21 **A.** I was very interested in fairly investigating
22 and prosecuting and, if the issue had been
23 raised with me, you know, I would have insisted
24 that it were investigated, irrespective of the
25 impact retrospectively on however many
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1 **Q.** Yes. That's a yes, putting everything else
2 aside.

3 **A.** Yes.

4 **Q.** Okay. Now, in terms of that investigation you
5 are -- you were Head of Security, you were in
6 control, generally, of investigations?

7 **A.** Yes.

8 **Q.** Yes, okay. You're prepared to take, if you
9 like -- you know, you're the boss, in relation
10 to this aspect of things.

11 **A.** Absolutely yes.

12 **Q.** You're prepared to take the rap, yes? All
13 right. Let's find out a bit more from you about
14 what you didn't do. Help us understand this
15 a little bit more. In terms of those fair
16 investigations, you're aware of this odd body
17 called the HSH but you're not entirely certain
18 where it exists, whether that's Fujitsu or POL.
19 Do you not think it would have been sensible to
20 perhaps work that one out: is this a Fujitsu
21 system or is this a POL system?

22 Do you not think, in terms of your fair
23 investigations, just getting the answer to that
24 simple question, Mr Marsh, might have been
25 helpful?

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1 **A.** No, at my level, I don't think that adds any
 2 value at all, unless I believed that at some
 3 point lower down, at my Head of Investigations
 4 level or below that, there was something amiss.
 5 So if I felt there was something amiss, then
 6 I would have been, as the saying goes, all over
 7 it. But I didn't think there was something
 8 amiss. My understanding was that things were
 9 going well. It was not an area in which
 10 I needed to have that level of detailed
 11 knowledge. Because I would never have been in
 12 direct contact with the HSH.

13 **Q.** You never bothered to even try and make contact,
 14 Mr Marsh. You never got any of your
 15 investigators to make contact with the HSH. You
 16 weren't even sure --

17 **A.** Stop. No, you cannot assume --

18 **Q.** Sorry. Mr Marsh, both of us in error there. My
 19 fault.

20 Did you ever, via an investigator, try and
 21 find out what on earth is going on with the HSH?

22 **A.** I did not. But that does not mean that my
 23 investigators were not at various levels in
 24 contact with ICL Pathway and Fujitsu and with
 25 the Horizon Programme, and satisfying
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1 committed an offence, yes?

2 **A.** Yes.

3 **Q.** And investigations -- are you aware they are
 4 meant to be investigations that point in the
 5 direction of any evidence that someone has
 6 committed an offence or whether they haven't?
 7 In other words --

8 **A.** I've repeatedly, you know, and pre-emptively
 9 made that point, that I am well aware of that
 10 and that was the basis on which I wanted to see
 11 my investigators operate.

12 **Q.** Then how was it embodied within the
 13 investigation system that there was a check on
 14 complaints, difficulties, problems with the
 15 Horizon System going to the Helpdesk? How was
 16 that done. If you're saying, essentially, there
 17 was no policies --

18 **A.** No, again, you see, I'm not saying there's no
 19 policy. What I've said is I would expect there
 20 to have been processes that would have ensured
 21 that we knew about this but the documentation
 22 that I have been given access to, 20 or so years
 23 after I was last at Post Office Limited, as
 24 Mr Beer has said, is partial.

25 So I'm -- I have said on a number of
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1 themselves, as they went through investigations
 2 and at a policy level, that things were going as
 3 they should be and that there were no issues
 4 that we needed to investigate.

5 **Q.** Have you found a policy that says to agents or
 6 the security department, "Let's make sure we
 7 know what's going on with HSH"?

8 **A.** No.

9 **Q.** No. Now, Mr Marsh you've said repeatedly that
 10 you were essentially waiting for somebody to
 11 knock on your door to tell you there was
 12 a problem. This document says there's
 13 a problem?

14 **A.** No, it doesn't. No. Let's be quite clear about
 15 that. This document does not say that there's
 16 a problem. This document outlines what -- the
 17 steps that would need to be taken, if the
 18 suggestion was that there were a problem. But
 19 it does not say -- this document was not drafted
 20 on the basis that there was a problem because
 21 had that, been the basis on which it were
 22 drafted, Mr Ferlinc and I would have dealt with
 23 it.

24 **Q.** Investigations are meant to be investigations
 25 into the question of whether somebody has
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1 occasions that there are areas in which I think
 2 there were very much were policy documents.
 3 Now, I'm not saying that there was necessarily
 4 a policy document, but I will say I firmly
 5 believe that there would have been a process of
 6 some sort that would have ensured that the
 7 minute anything became known via the HSH,
 8 whoever controlled it, or via the NBSC, that
 9 materially impacted upon evidence that we were
 10 getting from Horizon, we would have been made --
 11 that would have been made known to us.

12 But I cannot present you with a document
 13 because I am seven years retired from Royal Mail
 14 and what is it, 13 years gone -- no more than
 15 that, sorry -- 16 years gone from Post Office
 16 Limited. I have no access to -- you know, if
 17 I were appearing in front of you as a Post
 18 Office Limited manager, I would have expected
 19 a team to be running around for weeks beforehand
 20 gathering together all of the materials so
 21 I could answer these sorts of questions, if
 22 indeed that material still exists. But a lot of
 23 it did, and it's unfortunately not available
 24 now.

25 And I do apologise for -- well, I apologise
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1 for the fact that I can't be more absolute in my
 2 statements but, no, I am confident that there
 3 would have been a process to ensure, if anything
 4 were known about the Horizon System, it would
 5 have come to us, along with a great many other
 6 departments in POL, immediately.

7 **Q.** Tell us what you did wrong, Mr Marsh.

8 **A.** Tell me what exactly it is you're --

9 **Q.** You know what's happened here. People have been
 10 prosecuted that shouldn't have been prosecuted.
 11 That was under your watch, under your period of
 12 time. What did you do wrong? What's your
 13 failings?

14 **A.** Clearly I did not ask the right questions of the
 15 right people but, I mean, I have no recollection
 16 of asking. I don't think I ever said to anybody
 17 "Listen, there must be some system failings
 18 because there's no such thing as a system that
 19 doesn't have failings". So I certainly think
 20 that I am guilty of essentially absorbing the
 21 groupthink within Post Office Limited, that this
 22 was a good, solid and robust system, and that,
 23 you know, there was nothing wrong with it at the
 24 times that we spoke about it, and that we had
 25 processes that would ensure that we would be

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1 details. So I moved on 2 January 2007 to become
 2 the General Manager Security for Royal Mail
 3 Letters. Nothing to do with Post Office Limited
 4 whatsoever, and then, yes, in 2008 I became the
 5 Group Security Director. In --

6 **Q.** You're going to get me into trouble for taking
 7 too long if you continue talking, Mr Marsh.

8 **A.** I'll do this quickly. I apologise, sir. Right,
 9 Mr Scott --

10 **Q.** No, let me ask you the questions first. I'll
 11 ask you about Mr Scott in a second but just let
 12 me ask you about one document which is
 13 POL00030786, and that's POL00030786, page 1 of
 14 that, and this is an owner for you -- if you
 15 would, if you could just scroll down slightly.
 16 This is the policy on crime and investigation
 17 and you're the owner of this --

18 **A.** Yes.

19 **Q.** -- created in September 2008, and still the
 20 owner in 2011?

21 **A.** Yes.

22 **Q.** Yes. Okay. Could we go to page 4 of this
 23 document which outlines your role as Group
 24 Security Director under this policy. It's at
 25 paragraph 5. So if we could just scroll down on

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1 made aware. So naivety, if you will.

2 But certainly nothing with any form of
 3 intent. I did not know about the problems with
 4 the Horizon System and, had I known about them
 5 and had I known about them as early as it might
 6 have been possible to know about them, I'd like
 7 to think that a lot of the distress and trauma
 8 caused to people might not have happened or
 9 would not have happened.

10 **SIR WYN WILLIAMS:** Is that it, Mr Stein?

11 **MR STEIN:** Yes, sir.

12 **MR BEER:** Sir, in fact, there is one question from
 13 Mr Moloney, which will be a very short one.

14 **SIR WYN WILLIAMS:** Are you saying that Mr Beer?

15 **MS SCOTT:** No, he has said that to me.

16 **Questioned by MR MOLONEY**

17 **MR MOLONEY:** I don't lie, sir!

18 Mr Marsh, I just want to understand the
 19 relationship between you and Mr Scott, who is
 20 going to give evidence later. Do you
 21 understand?

22 **A.** Yeah.

23 **Q.** Okay, because you moved to be the Group Security
 24 Director for Royal Mail Group from 2008.

25 **A.** Let's take it back and I'll give you the

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1 this page, and we see all of your
 2 responsibilities under 5.2:

3 "The Group Security Director has
 4 a responsibility to ..."

5 Then it goes on 5.2.1:

6 "Ensure that appropriate structures are in
 7 place to enable the prompt and thorough
 8 investigation of any allegation of criminal
 9 offences committed by employees, agents or
 10 members of the public.

11 "Establish an effective crime response plan,
 12 commensurate with the level of crime risk
 13 identified as facing Royal Mail Group at a given
 14 point."

15 Then under 5.2.3, the various appropriate
 16 mechanisms that you're required to establish:

17 "Report levels of crime risk.
 18 "... significant incidents to the Board ...
 19 "... remedial actions to prevent or deter
 20 further crime.

21 "Engage with the Corporate Risk Management
 22 Committee, Audit & Risk Committee and the Mail
 23 Integrity Group on matters of Crime Risk and
 24 Mails Integrity."

25 Those were your responsibilities as Group

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1 Security Director from 2008 when the policy was
 2 created and still here in 2011.

3 **A.** Yes.

4 **Q.** Yes. Now, if I can ask you, did you have any
 5 management or oversight role in relation to John
 6 Scott at POL during those times?

7 **A.** No, I didn't, no.

8 **Q.** Right. Was there any relationship between you
 9 in practice during those times?

10 **A.** It wasn't a good relationship. Shortly after
 11 I had left POL, Ric Francis, who was -- had been
 12 my boss very briefly and was then John Scott's
 13 boss when John was appointed as my successor as
 14 Head of Security, essentially said to me that
 15 POL was, even at that point in time, was
 16 preparing itself for -- I don't know whether he
 17 said separation or a greater independence, but
 18 some sort of, you know, parting of the ways from
 19 Royal Mail and POL, and that he would like to
 20 see John Scott left to his own devices to get on
 21 and run the department, run the team as he
 22 wished to. And, from that point on, I adopted
 23 an approach which essentially ensured that all
 24 of the resources that Post Office Limited could
 25 need were available from Royal Mail Group. We
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1 separation, so there was a piece of work going
 2 on to ensure that any documentation that we had
 3 or had generated within Group Security that POL
 4 might need was available for them to take away
 5 and rebadge as they wished to. But I'm afraid
 6 that's about as far as it went and, of course,
 7 what I knew was how heavily the team in POL had
 8 been reduced in headcount, much as my own team
 9 in Group Security was. So on both sides of the
 10 fence, we were losing staff every few months,
 11 you know, to another review and a headcount
 12 reduction. It did make life very difficult.

13 **Q.** Would it be fair to say, then -- and this is my
 14 last question, would it be fair to say then that
 15 there were stresses within security during that
 16 time?

17 **A.** Yes, I mean there were tensions between Post
 18 Office Limited Security and Royal Mail Group
 19 Security, but there were stresses on both sides
 20 of that divide, if you will, because all of us
 21 were continuing to try to do as much as we used
 22 to do, and this isn't just investigation, this
 23 is a huge amount of physical security, process
 24 security, protection of individuals, and so on,
 25 with less and less resource. So it, you know,
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1 made very few requests from POL and those
 2 requests that we did make were rarely answered
 3 effectively.

4 It wasn't, as I say, a great working
 5 relationship and I regretted that. And quite
 6 a number of people in POL, when we had vacancies
 7 on the Royal Mail side, sought to leave POL and
 8 come across to Royal Mail, as investigators or
 9 security managers.

10 **Q.** So far as these responsibilities were concerned,
 11 you didn't feel that, so far as your point in
 12 the group, that that necessarily meant you had
 13 any responsibility for what went on within POL?

14 **A.** I had discussed the situation with a person that
 15 I work for and, you know, we concluded that it
 16 would be difficult. So I don't dispute exactly
 17 what that says there, that the Group Security
 18 Director has responsibilities. And, certainly,
 19 2008/2009, I did try to assist John Scott to
 20 make sure he had always necessary resource and
 21 all the advice needed. He didn't really welcome
 22 advice from me.

23 By the time we got to 2011 and when this
 24 document is dated, we were all -- I mean, the
 25 two businesses were working very much towards
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1 it was difficult.

2 **Q.** Did you feel you were under-resourced in
 3 security?

4 **A.** I did feel that and I made that point clear very
 5 many times, yes. So, you know, that will be on
 6 record in a number of places, I'm sure.

7 **Q.** So far as Mr Scott is concerned, I can't ask you
 8 to speak for Mr Scott, but did you get the
 9 impression that Mr Scott felt he was
 10 under-resourced in security?

11 **A.** I never had that level of discussion with him
 12 after we parted ways but, if you asked me,
 13 I would have said that of the level he got down
 14 to was definitely less resource than reasonably
 15 was required to do the jobs that I thought were
 16 probably still necessary in Post Office Limited.

17 **MR MOLONEY:** Thank you very much, Mr Marsh.
 18 Thank you very much, sir, for allowing me to
 19 ask those questions.

20 **SIR WYN WILLIAMS:** All right. So I take it,
 21 Mr Beer, that's the end of the questioning of
 22 Mr Marsh?

23 **MR BEER:** Yes, it is, sir.

24 **SIR WYN WILLIAMS:** Thank you, Mr Marsh, for your
 25 detailed witness statement and for spending
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1 a good deal of time today answering very many
 2 questions. I'm grateful to you.
 3 **THE WITNESS:** Thank you, sir.
 4 **SIR WYN WILLIAMS:** 10.00 tomorrow morning?
 5 **MR BEER:** Yes, that's right, with Mr Jenkins.
 6 **SIR WYN WILLIAMS:** Right, all right then.
 7 **MR BEER:** Thank you very much, sir.
 8 **(4.18 pm)**
 9 **(The hearing adjourned until**
 10 **10.00 am the following day)**
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