

1 **Thursday, 27 July 2023**

2 **(09.58 am)**

3 **MS PRICE:** Good morning, sir. Can you see and hear

4 us?

5 **SIR WYN WILLIAMS:** I can indeed.

6 **MS PRICE:** May we continue, then, with the evidence

7 of Ms Helliwell?

8 **SIR WYN WILLIAMS:** Yes, of course.

9 **SUSANNE JANE HELLIWELL (continued)**

10 **Questioned by MS PRICE (continued)**

11 **MS PRICE:** Good morning, Ms Helliwell.

12 **A.** Good morning.

13 **Q.** We looked yesterday afternoon at counsel's

14 advice in the Cleveleys case, which was dated

15 26 July 2004. Then just before we adjourned, we

16 looked at the note of a conference call with

17 counsel attended by you, Mandy Talbot, Jan

18 Holmes and Keith Baines, at which further

19 evidence was discussed and a plan was made for

20 the production of statements from Jan Holmes and

21 Keith Baines.

22 **A.** Yes.

23 **Q.** May we have, please, that note on screen, the

24 reference is WITN04600310. We can see here the

25 date at the top left and that's 3 August 2004,

1

1 **Q.** His view, set out at paragraphs 37 and 40 of

2 that written advice -- we needn't go back to

3 them, we looked at them yesterday, but just in

4 summary -- was that it could be argued that any

5 implied term should extend only as far as the

6 obligation to take reasonable steps to provide

7 a computer system that was fit for purpose. Is

8 that a fair summary?

9 **A.** Yes, it is. I would say it is.

10 **Q.** The fact that system provided may have been

11 defective on this occasion, to use his words,

12 did not necessarily mean a breach of this

13 implied term, and his advice was that further

14 evidence should be adduced on behalf of the Post

15 Office that reasonable steps were indeed taken;

16 is that right?

17 **A.** Yes.

18 **Q.** It's against that backdrop, isn't it, that the

19 discussion of further evidence at the conference

20 was taking place?

21 **A.** Yes, it was, yeah.

22 **Q.** Looking, please, to just above the trial date in

23 this note, we see counsel's conclusion, that

24 first word is difficult to make out, but:

25 "... if goes to dispute, likely to find that

3

1 so eight days after counsel's advice was

2 produced. We can see about halfway down the

3 page the trial date, which was 16 to 18 August,

4 so less than a fortnight away.

5 **A.** Yes.

6 **Q.** My question for you yesterday, which prompted us

7 to go to this document, related to the purpose

8 of the further evidence which was obtained from

9 Jan Holmes and Keith Baines, namely the

10 statements of the 11 August 2004. We know that

11 counsel had advised the Post Office to abandon

12 its claim against Mrs Wolstenholme for apparent

13 losses in the sum of just over £25,000?

14 **A.** Yes, yes.

15 **Q.** And the advice was also to admit

16 Mrs Wolstenholme's claim of wrongful

17 termination; that's right, isn't it?

18 **A.** Yes, it is, yeah.

19 **Q.** He had advised, however, that there was

20 an argument to be made on one part of

21 Mrs Wolstenholme's counterclaim, the claim that

22 there was an implied term in the contract for

23 services that the computer system provided for

24 her use would be fit for purpose?

25 **A.** Yes.

2

1 computer system let JW down."

2 Then under "Tricky position", a bit further

3 down the page:

4 "We say she had difficulty operating and

5 calls to HSH were part of dealing with problems.

6 Beyond point of analysing her system. Aiming to

7 say that potentially implied terms to provide

8 system that worked and system in place to

9 support her."

10 Over the page, please:

11 "Extra evidence that can be introduced to

12 support this claim."

13 So it appears, doesn't it, that the evidence

14 to be obtained from Jan Holmes and Keith Baines

15 was intended to address the reasonable steps

16 taken to ensure the computer was fit for

17 purpose, the implied term point.

18 **A.** Yes, and the support given.

19 **Q.** Before we leave this document, can we look,

20 please, towards the bottom of this page. The

21 penultimate point here from KB; is that Keith

22 Baines?

23 **A.** Yes, I believe so.

24 **Q.** "During acceptance satisfied that if crashes

25 happen then transactions would not be lost."

4

1 So this what you were being told, isn't it,
 2 about the Post Office's understanding of the
 3 consequence of crashes for transactions at the
 4 point of acceptance.

5 **A.** Yes, that's what we were being told. Yes.

6 **Q.** That document can come down now. Thank you.

7 Following this conference call, you assisted
 8 Jan Holmes and Keith Baines to produce those
 9 statements that we've just discussed. In
 10 relation to Jan Holmes' statement, the reference
 11 in your statement for the Inquiry at
 12 paragraph 18 is, in fact, to a draft statement.
 13 We do now have the final version and, for the
 14 benefit of the transcript, that is WITN09020117.
 15 We need not display that document now.

16 Keith Baines's second witness statement,
 17 dated 11 August 2004, is at POL00118224. May we
 18 have this on screen, please.

19 Can you recall now what the process was for
 20 the drafting of these statements from Jan Holmes
 21 and Keith Baines?

22 **A.** In the case of Keith Baines, I would have had
 23 more involvement in the actual drafting,
 24 taking -- he would provide the information in
 25 a form that I would then adapt and put it in

5

1 provided the body of it and obviously again, the
 2 comments from myself, counsel, to deal with any
 3 amendments or any queries that we were looking
 4 at -- that we had.

5 **Q.** Could we look, please, further down the page,
 6 starting at paragraph 3 in this second statement
 7 of Keith Baines. We see here the evidence:

8 "The Horizon system was developed as
 9 a managed service by Fujitsu Services Limited,
 10 formerly ICL Pathway Limited who also provided
 11 the actual equipment. Notwithstanding this and
 12 as is the Post Office's usual practice in
 13 contracts for the development of complex IT
 14 services, the Post Office put in place a formal
 15 acceptance process to satisfy itself that the
 16 service was fit for purpose before allowing it
 17 to be widely deployed.

18 "The Post Office's required specification of
 19 the service provided by Fujitsu included
 20 requirements relating to the ease of use of the
 21 system, the stability of the system and the
 22 integrity of the financial information which it
 23 produces.

24 "The acceptance process of the system used
 25 a mixture of technical reviews, testing by

7

1 more of a witness statement form and obviously
 2 take further instructions from him on any points
 3 that I wasn't sure about or where I thought
 4 further information was required. And I think
 5 as I said yesterday, I base it on the
 6 information and documentation received from him,
 7 it would be approved. It would then be looked
 8 at by counsel and counsel would have his input
 9 and deal with any queries or amendments
 10 following that.

11 **Q.** Can we look, please -- apologies.

12 **A.** I was going to say that I think the position
 13 with Jan Holmes would have been slightly
 14 different, which I can explain if you want me
 15 to.

16 **Q.** Please do.

17 **A.** I think as I've said in my statement, obviously
 18 Fujitsu weren't our client. So my involvement
 19 with them was limited. I think, looking at Jan
 20 Holmes' statement, he produced the -- very much
 21 the narrative of it because it was very factual
 22 and sort of detailed about the system itself.
 23 And looking at the format of the text,
 24 I probably put in more just at the start of the
 25 statement and then the end of it, and then he

6

1 Fujitsu and by the Post Office and the operation
 2 of a live pilot stage in Post Office branches to
 3 confirm that each requirement was being met
 4 satisfactorily. I should state that this was
 5 not a 'rubber stamping' exercise, and that
 6 significant problems were found and remedied
 7 before the main 'rollout' was authorised.

8 "Whilst there were some problems with system
 9 stability during the early stages of the
 10 acceptance process, these were rectified, and
 11 a period of monitoring in pilot offices during
 12 October and November 1999 demonstrated that the
 13 rectification had been effective in reducing the
 14 incidents of reboot and related problems to
 15 an average rate of less than 4 per counter
 16 position per annum. Subsequent improvements by
 17 Fujitsu during the year 2000 reduced this to
 18 less than 3 per counter position per annum."

19 What were you told about the detail of the
 20 acceptance process being referred to here by
 21 Mr Baines?

22 **A.** My goodness, again, it's 19/20 years ago. I can
 23 only assume that I was told what was -- pretty
 24 much what was in his witness statement.

25 **Q.** Were you given any further detail beyond what is

8

1 here?

2 **A.** I just can't remember. I mean, to the best of
3 my recollection, these were quite -- they were
4 quite detailed and technical statements that
5 really the information came from -- very much
6 from the parties, the individuals who were
7 providing the statements. I may have asked
8 questions around that and got further
9 information but I just can't remember.

10 **Q.** We looked yesterday at Keith Baines' first
11 witness statement. May we have that on screen
12 again, please. It is POL00118250. Looking,
13 please, over the page to paragraph 5 of that
14 statement. In this first statement in 2003,
15 Mr Baines said this:
16 "Any faults that occurred in the Horizon
17 computer system were eliminated once they were
18 identified. Whilst it is possible for mistakes
19 to occur, this is usually through incorrect
20 inputting in the computer system in the office
21 affected by the mistake. All subpostmasters
22 were fully trained in the use of Horizon
23 equipment. The system was fully tested before
24 it was used by the Post Office and it is fit for
25 its purpose. The system itself does not create

9

1 reducing the incidents of reboot and related
2 problems to an average rate", and we see those
3 two rates provided there.

4 **A.** Mm. I can only assume that, at the time,
5 obviously he believed the statement in his first
6 witness statement to be true. Can I just have
7 a look at that sentence again, just so I can --

8 **Q.** In the first statement?

9 **A.** Yeah.

10 **Q.** That is POL00118250, over the page, please, to
11 paragraph 5.

12 **A.** It's not hugely different because he's saying
13 that the problems -- that there were faults but
14 they were eliminated, as opposed to rectified.

15 **Q.** I was referring, really, to the reduction
16 reference to incidents. So a reduction in
17 incidents to three per counter position
18 per annum?

19 **A.** He may not -- at that stage, we were looking at
20 it from a different perspective and he was then
21 asked to look into it in more detail. So it may
22 be that the further detail produced that
23 information, that he then provided in his second
24 statement.

25 **Q.** When you were assisting Mr Baines in drafting

11

1 losses as is claimed by Mrs Wolstenholme."

2 There seems to be a difference, does there
3 not, between what Mr Baines is saying at
4 paragraph 6 of his second statement that we've
5 just looked at, that rectification had been
6 effective in reducing the incidents of reboot
7 and related problems, and what is said here at
8 paragraph 5 in the first statement:
9 "Any faults that occurred in the Horizon
10 computer system were eliminated once they were
11 identified."
12 At the time you were involved in drafting
13 Mr Baines' second statement, did you have any
14 concerns that Mr Baines had not been full and
15 frank about the problems which had been
16 experienced with the Horizon System in his first
17 statement?

18 **A.** Could I just have a look at his second statement
19 again, the paragraph that you were referring to,
20 please?

21 **Q.** Of course. Looking back, please, to
22 POL00118224, and over the page, please, to
23 paragraph 6.
24 We see here, about three lines down:
25 "... the rectification had been effective in

10

1 his second statement, did he tell you about any
2 specific bugs, errors and defects which had been
3 identified in the Horizon System up to that
4 point?

5 **A.** Not that I can remember, no.

6 **Q.** That document can come down now. Thank you.
7 We know that this case did settle and that
8 the Post Office made a payment to
9 Mrs Wolstenholme. Were any formal concessions
10 made in the case before this settlement was
11 achieved?

12 **A.** This is the bit I really can't remember, and
13 I can't remember the terms on which the case was
14 settled. So I can't help you on that.

15 **Q.** Can you help us with whether the statements of
16 Jan Holmes and Keith Baines, dated 11 August
17 2004, were ever failed at court and served on
18 Mrs Wolstenholme?

19 **A.** I can't recall, no. I mean, as I say, I can't
20 recall. I've assumed that we perhaps settled it
21 actually on the day when we -- as the trial
22 started. But I have got no specific
23 recollection.

24 **Q.** It may follow from your answer -- your answers
25 you've just given -- but can you help us with

12

1 what the final settlement figure was in the
2 case?
3 **A.** No. No, when I read through these papers, I do
4 recall the £25,000 payment into court. So I do
5 recall that that was made, and then obviously
6 the Post Office would have had to have paid more
7 to settle it but I can't remember what the terms
8 were.

9 **Q.** The final document I would like to take you to,
10 please, is POL00095375. This is a letter from
11 Keith Baines to Colin Lenton-Smith, dated
12 5 February 2004. If we can just scroll down
13 a little, so we can see who it's from. Over the
14 page, please. This appears to be the letter
15 which Colin Lenton-Smith's Cleveleys letter and
16 appendix, which we looked at yesterday, was
17 responding to.

18 There is one point in particular I would
19 like to ask you about, the bottom paragraph on
20 the first page, please:

21 "The County Court instructed the parties
22 jointly to commission a report from an expert
23 approved by the Court. I enclose a copy of his
24 report. As you will see, the expert's opinion
25 is that the Horizon system installed at

13

1 think I was aware that the Post Office were
2 concerned about a precedent being set. That
3 probably came -- that came later.

4 **Q.** You say that came later. When later did you
5 become aware of that?

6 **A.** Um, well, I can say that I was specifically
7 aware of it in the run-up to the advice that we
8 got from Stefan Lewinski because that
9 prompted -- that was one of the matters that
10 prompted us to get the advice because of the
11 difficulties in the case and possible
12 consequences of the case -- of there being
13 a finding against the Post Office.

14 So I can certainly say in the run-up to
15 obtaining that advice and then having had that
16 advice and afterwards.

17 **Q.** At the time, were you aware of any other cases
18 involving the Post Office in which
19 subpostmasters were attributing apparent losses
20 to the Horizon System?

21 **A.** No, no, I wasn't. No, I wasn't aware of any
22 cases, no.

23 **Q.** If there were such cases, would you have
24 expected the Post Office to tell you about them?

25 **A.** I would have expected them to -- the Post Office

15

1 Cleveleys branch was defective and that the HSH
2 was more concerned with closing calls than
3 preventing recurrence of faults. As I'm sure
4 you will understand, Post Office is concerned by
5 these findings, not only in relation to this
6 particular case, but also because of any
7 precedent that this may set and that may be used
8 by Post Office's agents to support claims that
9 the Horizon System is causing errors in their
10 branch accounts."

11 Were you aware at the time of the Post
12 Office's concern to avoid a precedent being set,
13 that may be used by the Post Office's agents to
14 support claims that the Horizon System is
15 causing errors in their branch accounts?

16 **A.** What's the date of this letter again, sorry?

17 **Q.** This is 5 February 2004, so this is just after
18 Mr Coyne's opinion was produced.

19 **A.** I think at that stage I was -- the only thing
20 I was aware of was that the Post Office, the
21 people I was dealing with, were concerned by the
22 findings of the report and concerned that Jason
23 Coyne had reported on possible defects in the
24 system because, obviously, they hadn't believed
25 that to be the case. At this stage, I don't

14

1 to tell me that they had other ongoing cases in
2 which -- yeah, in which alleged defects --
3 defects with the system were being alleged.

4 **Q.** Would you have considered information relating
5 to such cases to be disclosable material in the
6 Cleveleys case?

7 **A.** It would depend on the nature of the
8 information. I'd have to see -- I'd have to
9 have a look at what information there was and
10 then take view on it from there.

11 **Q.** The losses alleged in this case by the Post
12 Office totalled over £25,000. If the Post
13 Office considered these were true losses, rather
14 than illusory ones, what was the Post Office's
15 explanation or favoured explanation for the
16 shortfall? Can you recall?

17 **A.** I can't specifically recall. I know that there
18 were suggestions about errors in inputting
19 information and the management of the system,
20 but I don't -- I can't specifically recall.

21 **SIR WYN WILLIAMS:** Sorry, as far as you were aware,
22 Ms Helliwell, did the Post Office in any witness
23 statement seek to explain the losses it was
24 alleging, ie to break down where the £25,000 had
25 come from and how it could be that that had been

16

1 lost?

2 **A.** Not from memory. I --

3 **SIR WYN WILLIAMS:** I mean, it's not there on the

4 face of the statements we've seen. I was just

5 wondering if you'd ever been party to

6 a discussion where they might have been, if you

7 like, trying to work out what had happened?

8 **A.** No, I don't recall being part of the discussion,

9 all I can say is that I would assume that we'd

10 have disclosed documents supporting those

11 losses. But, in terms of any discussion,

12 I can't recall being a party.

13 **SIR WYN WILLIAMS:** This isn't being critical of you

14 but, if I were to draw the conclusion, if I need

15 to, that, basically, what happened was Horizon

16 said £25,000 was missing so the Post Office just

17 accepted it, and it was up to the subpostmaster

18 to try to prove the opposite; is that fair?

19 **A.** I think that it would be fair to say that --

20 they would be asked to justify those losses and

21 how they were calculated.

22 **SIR WYN WILLIAMS:** Yes, well, what -- it may be that

23 we just haven't got all the documents, so

24 I don't want to be unfair in any way at all, but

25 there seems to be a complete absence of focus on

17

1 the bottom of that page. Apologies, I need to

2 give you a page number. Page 13 within the

3 trial bundle.

4 Looking towards the bottom of that at page,

5 please, paragraph 5:

6 "The Defendant's subpostmaster's account

7 shows an overall final loss in the sum of

8 £25,034.34 in respect of the period up to and

9 including 4 December 2000. An itemised

10 breakdown of this figure is attached at

11 pages 61-67. Suction sum remains outstanding to

12 date."

13 So, sir, there is a document that shows

14 some -- shows discrepancies, ultimately, on the

15 accounts.

16 **SIR WYN WILLIAMS:** What I was trying to get at, and

17 perhaps you could help me -- I'd forgotten about

18 this, so thank you for reminding me -- but is it

19 any more than the Horizon record?

20 **MS PRICE:** No, sir. That's my understanding. The

21 document, for the reference, starts at page 80

22 of that, using the external pagination of that

23 document we've been looked at.

24 **SIR WYN WILLIAMS:** All right. I'll look at that for

25 myself. Thank you. Yes.

19

1 what happened to the £25,000 in this case. All

2 that seems to have happened is that Horizon says

3 "There's a deficit in that amount, therefore

4 there must be, therefore you, Mrs Wolstenholme,

5 are reliable for it"?

6 **A.** I can see that that does -- that is how it looks

7 but we've not seen the list of documents or the

8 documents that were provided by the Post Office

9 that could -- I'm not saying they would -- have

10 supported how that loss was calculated and how

11 it came about.

12 **SIR WYN WILLIAMS:** Anyway. This isn't a memory test

13 for you.

14 **A.** No, I know. It's so hard.

15 **SIR WYN WILLIAMS:** As a solicitor acting for the

16 Post Office in this litigation, you don't

17 actually remember seeing any documents which

18 explained the losses; is that fair?

19 **A.** Yes, I don't. I mean, that's not saying that

20 there wouldn't be, because I'm sure I would have

21 asked for them because we'd have to substantiate

22 the losses and how they were claimed.

23 **MS PRICE:** Sir, for completeness, the Amended

24 Particulars of Claim, if we can have those on

25 screen, please. That's POL00118218, starting at

18

1 While I'm asking, the other question that

2 came into my mind, Ms Helliwell, was relating to

3 the questions that Ms Price asked you about the

4 differences in the wording between paragraphs 5

5 and 6 of Mr Baines's two statements, all right?

6 **A.** Yes.

7 **SIR WYN WILLIAMS:** I don't want to pursue the

8 difference in wording with you but, especially

9 in the second statement where he talks about

10 there being a reduction, as opposed to

11 an elimination, it did strike me that that is

12 information that could only have come from some

13 kind of document. It's not very likely that

14 Mr Baines was carrying that around in his head.

15 That's what I had in mind.

16 Do you recall any documents being made

17 available to you so that you could disclose them

18 in support of that witness statement?

19 **A.** I don't specifically recall any documents, no.

20 **SIR WYN WILLIAMS:** Because, on the face of it, would

21 you agree with me that, if you're going to

22 produce what would have been very late evidence

23 as in paragraph 6, giving quite an important

24 detail about a reduction in a problem, and

25 documents exist, you would have expected that

20

1 they would have been exhibited to the witness
 2 statement, wouldn't you?
 3 **A.** Yes, you would. Yes.
 4 **SIR WYN WILLIAMS:** Clearly that didn't happen on any
 5 view of it?
 6 **A.** Pardon, sir? Sorry, sir? What was that?
 7 **SIR WYN WILLIAMS:** On any view of it, that didn't
 8 happen?
 9 **A.** No, it didn't, no.
 10 **SIR WYN WILLIAMS:** Right. Thank you.
 11 Sorry, Ms Price, for jumping in like that.
 12 **MS PRICE:** Not at all. Thank you, sir.
 13 Did you understand there to be any desire on
 14 the part of the Post Office to get to the bottom
 15 of what might have gone wrong at the Cleveleys
 16 branch?
 17 **A.** Not from the people that I dealt with or spoke
 18 to. I think I said in my witness statement,
 19 I said in my evidence, that the people I dealt
 20 with were shocked and concerned by the findings
 21 of Jason Coyne's report and information that
 22 seemed to be coming to light.
 23 **Q.** Given the conclusions reached by Mr Coyne and
 24 the fairly stark advice received from counsel,
 25 did anyone within the Post Office or Fujitsu

1 Mr Coyne's report, was, going beyond the
 2 Cleveleys case?
 3 **A.** No, because at that stage, as far as we were
 4 concerned or possibly the Post Office, it could
 5 have just been isolated to that particular set
 6 of equipment, that system that was in use at
 7 that branch.
 8 **MS PRICE:** Ms Helliwell thank you very much. Those
 9 are all the questions that have.
 10 Sir, before turning to Core Participants, do
 11 you have any remaining questions for
 12 Ms Helliwell?
 13 **SIR WYN WILLIAMS:** No, thank you. As I said,
 14 I jumped in and asked them, so thanks very much.
 15 **MS PRICE:** I think there are some questions from the
 16 Hodge Jones & Allen team and the Howe+Co team,
 17 starting with the Hodge Jones & Allen team and
 18 Mr Henry.

Questioned by MR HENRY

20 **MR HENRY:** Thank you very much.
 21 Ms Helliwell, the fact that Mrs Wolstenholme
 22 was a litigant in person, she was representing
 23 herself, did that in any way influence the
 24 instructions you were given by your client?
 25 **A.** No. She had previously had solicitors as well,

1 express concern that the Horizon System might be
 2 causing illusory losses in the accounts of
 3 subpostmasters?
 4 **A.** I don't recall specific concerns being raised
 5 with me, apart from, you know, the concerns I've
 6 already referred to. I don't remember any other
 7 concerns raised about other accounts where that
 8 may or -- that may be attributable to the losses
 9 on those accounts, as well.
 10 **Q.** Did anyone suggest to you that there would be
 11 any form of investigation by the Post Office or
 12 Fujitsu to establish whether there was a basis
 13 for the suggestion that problems with the system
 14 might be causing apparent shortfalls in branch
 15 accounts?
 16 **A.** No, I don't recall that.
 17 **Q.** You said yesterday, Ms Helliwell, that you were
 18 shocked and concerned by Mr Coyne's report. Did
 19 you discuss the content of the report with your
 20 supervising partner?
 21 **A.** I would have done, because I had regular review
 22 meetings, so cases were discussed at those
 23 meetings.
 24 **Q.** Was there any consideration given by Weightmans
 25 to what the wider implications of this report,

1 hadn't she?
 2 **Q.** Sorry?
 3 **A.** She previously had solicitors and then she acted
 4 in person.
 5 **Q.** Yes. Why do you think that was?
 6 **A.** I assume finance, money.
 7 **Q.** Yes, exactly. So financial pressure. Did you
 8 or your client give any thought to the fact that
 9 she was a litigant in person?
 10 **A.** As a solicitor, you always give -- have some
 11 regards to the fact that someone is a litigant
 12 in person and obviously deal with them
 13 accordingly, that they don't have the same
 14 knowledge of the legal system.
 15 **Q.** Because I'm just -- if we might have a look,
 16 please, at POL00118221, please. I'd be very
 17 grateful if we could go to the internal
 18 pagination at page 208, please. There we can
 19 see your letter, which I -- obviously you must
 20 have an opportunity to read it to yourself.
 21 **A.** Yes.
 22 **Q.** When you have confirmed that you've read it to
 23 yourself, I'd like to take you to the response
 24 to your letter of 29 April, which is the
 25 following page, 209.

1 A. Okay.

2 Q. If we therefore go to 209. Again, if you would
3 be so kind as to just read that to yourself.

4 A. Yes.

5 Q. I mean, did you consider that you might have to,
6 given the fact that Mrs Wolstenholme was a
7 litigant in person, explain the court orders to
8 her, so that she was in no doubt of the
9 obligations upon her?

10 A. We had been at a hearing, and she'd been
11 present, and the District Judge had very clearly
12 explained what was required but I think then in
13 my next letter I may have clarified further
14 about the computer expert, I think, from
15 a further letter. And I think I simply sent her
16 the list of documents and the documents in
17 another letter, rather than her having to
18 request copies.

19 Q. Yes. You received instructions, since you
20 mention your further letter, if we could go to
21 internal documentation 211, please:
22 "Finally, as regards your request for the
23 call log details to Horizon from the period
24 June 2000 to November 2000, our client does not
25 have copies of these call log details and the

25

1 information I was receiving from the client.

2 Q. I see. Thank you.
3 Could I now turn to the issue of the single
4 joint expert, and you were asked by learned
5 Counsel to the Inquiry whether the statements of
6 Mr Holmes and Mr Baines were lodged with the
7 court and you could not say. But you accept the
8 principle, don't you, that with a single joint
9 expert, as we can see the order of the County
10 Court, single joint expert, it's vitally
11 important that they are only provided with
12 completely accurate information --

13 A. Yes.

14 Q. -- and that the information submitted to them
15 must be scrupulously checked to ensure that the
16 expert is not offering an opinion on a false
17 premise?

18 A. Mm.

19 Q. You agree?

20 A. Yes.

21 Q. Thank you.
22 When an adverse opinion, such as that
23 received from Mr Coyne was received and Fujitsu
24 employees sought to rebut it, did the Post
25 Office recognise that Mr Coyne's opinion was

27

1 only call log details in our client's possession
2 are those referred into item 10 of our client's
3 List."

4 Is that what you were told, that the Post
5 Office did not have call log details to the
6 Helpdesk from the period June 2000 to November
7 2000?

8 A. That's what I would have been told at the time
9 and that's why it was in that letter.

10 Q. So did you not question their apparent void in
11 document retention and recording of information?

12 A. I certainly would have done.

13 Q. What were you told?

14 A. Well, as far as the -- these call log details,
15 they were then actually produced, weren't they?

16 Q. So you were therefore, at that point, being
17 given misinformation?

18 A. It would appear so because they were
19 subsequently produced. Correct me if I'm wrong.

20 Q. Well, we'll come back to that if necessary,
21 but --

22 A. But my letter was based on information --

23 Q. Your evidence here is that this was
24 misinformation.

25 A. This letter, obviously this is based on the

26

1 independent and unbiased?

2 A. I can't specifically say that they did, but
3 I certainly saw his opinion as being independent
4 and unbiased, and I would have relayed that to
5 the client. He was a joint expert that was
6 instructed and we had no reason to consider
7 otherwise, that it would be other than unbiased.

8 Q. Mm. Can you recall, notwithstanding the advice
9 you believe you tendered to the Post Office, can
10 you recall whether they accepted Mr Coyne's
11 opinion or not?

12 A. Whether the Post Office accepted it?

13 Q. Yes.

14 A. It's just so hard to recall but I can just more
15 recall the concern and questioning of how -- you
16 know, of that opinion because it had come as
17 a complete surprise and shock to them, and
18 it's --

19 Q. Did they settle with good grace or did they, in
20 effect, very, very -- shall we put it
21 neutrally -- reluctantly settle this case?

22 A. From the -- certainly the people I dealt with,
23 they settled with good grace --

24 Q. Ah.

25 A. -- as opposed to it being reluctantly because

28

1 they had to accept that the evidence --
 2 **Q.** So it would follow, if they were settling it
 3 with good grace, that they would be persuaded of
 4 the merits of the unbiased and independent
 5 report and would want, therefore, to disseminate
 6 the information as widely as possible, given the
 7 risk to other subpostmasters, would it not?
 8 **A.** Could you just repeat that, please?
 9 **Q.** Well, it would follow, if they were settling it
 10 with good grace, that they would be very
 11 concerned as to the content of the independent
 12 and unbiased expert report and would want to
 13 disseminate the information so that there should
 14 be no risk presented to other subpostmasters?
 15 **A.** You would imagine that. The only qualification
 16 I would make is that this report was based on
 17 very limited information and documentation,
 18 and --
 19 **Q.** And who's responsible for that?
 20 **A.** Well, Fujitsu had -- you know, for whatever
 21 reason, the archiving provisions rules, which
 22 obviously had been changed by this time but
 23 there was certainly a feeling that the expert's
 24 report could have been -- could have been
 25 different, had there been a full set of

29

1 **A.** Mr Baines individually? Um ...
 2 **Q.** Yes.
 3 **A.** Yes, I can't recall that he did -- that he
 4 specifically said that, but ...
 5 **Q.** Can we have a quick look -- no, I'm going to
 6 move on.
 7 But he was the most senior person from the
 8 Post Office at that conference, wasn't he?
 9 **A.** Yes, Mandy Talbot was there though, wasn't she?
 10 **Q.** Yes, but he was a very senior member of the Post
 11 Office at that conference, wasn't he?
 12 **A.** Yes.
 13 **Q.** You would you agree that, at around that time of
 14 that conference, they wanted to avoid, and they
 15 were very particular about this, publicity
 16 concerning Mr Coyne's negative report?
 17 **A.** Yes.
 18 **Q.** Right. We know the fundamental issue was that
 19 Mr Coyne had concluded that Horizon was at
 20 fault. Pursuant to my earlier question when you
 21 said that the Post Office accepted that with
 22 good grace, do you accept now that the Post
 23 Office allowed themselves to become more
 24 concerned with suppressing that information than
 25 actually learning from it and addressing it?

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1 information available and data available.
 2 **Q.** I mean --
 3 **A.** There was no -- nobody knew that.
 4 **Q.** Surely, I mean, it is obvious, and I mean no
 5 disrespect to you in stating that it is obvious,
 6 that the Post Office did not want Mr Coyne's
 7 findings to be widely known or even narrowly
 8 known by anyone other than those involved in
 9 that case?
 10 **A.** I would accept that, yes.
 11 **Q.** Yes, and learned Counsel to the Inquiry asked
 12 you about the Post Office's concern to avoid
 13 publicity about Mr Coyne's negative report, did
 14 they not?
 15 **A.** Yes.
 16 **Q.** You stated that this was expressed at around the
 17 time of the conference with counsel, correct?
 18 **A.** Yes, it must have been the run-up to it and
 19 around the time, yes.
 20 **Q.** Yes. We know that Mr Baines was at that
 21 conference, don't we?
 22 **A.** Yes.
 23 **Q.** Would it be right to say that Mr Baines agreed
 24 that the Post Office should be seeking to avoid
 25 publicity?

30

1 **A.** That's a difficult question for me to answer
 2 because, at the time of my involvement, they
 3 were concerned to avoid publicity. But what
 4 they then did with that information moving
 5 forward and looking at other issues that
 6 I didn't know about, maybe that were ongoing
 7 with other subpostmasters, I wouldn't have been
 8 a party to that and how they --
 9 **Q.** I realise this is very difficult for you because
 10 of the lapse of time but, of course, you are
 11 relieved of your obligation, it wasn't your
 12 privilege, it's the client's privilege and it's
 13 been waived, you are relieved from the burden of
 14 professional legal privilege. Did you see it as
 15 any part of your job to warn the Post Office
 16 that it would be advisable to get to the bottom
 17 of this contentious issue, rather than
 18 suppressing it?
 19 **A.** I would have certainly advised that the report
 20 had to be taken very seriously and that
 21 questions needed to be asked.
 22 **Q.** Surely, they must have sought your counsel, your
 23 advice, on this, because it went to the heart of
 24 whether Horizon was safe?
 25 **A.** I can't say whether they sought my advice on

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1 that or what discussions we had. It's just so
 2 difficult to remember.
 3 **Q.** But you do recall that you would have advised
 4 them to take it seriously?
 5 **A.** Yes.
 6 **Q.** Yes.
 7 **A.** I would have --
 8 **Q.** I mean, surely, you're a commercial lawyer and
 9 a litigator. The reputational risk and the
 10 enormous damage to the Post Office must have
 11 featured in the considerations that centred upon
 12 this case?
 13 **A.** Yes, it would have featured but, again, at that
 14 time, we were looking at one isolated case. We
 15 didn't -- I didn't know if there were other
 16 cases ongoing.
 17 **Q.** Sorry?
 18 **A.** At that point, we were looking at this one
 19 individual case. Whether there were other cases
 20 ongoing at that time about -- with issues with
 21 the system, I don't know. And I think, as
 22 I mentioned earlier, although the report was
 23 very concerning, it had to be looked at in the
 24 context of would it have been any different, had
 25 all the data been available to Jason Coyne? His

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1 et cetera:
 2 "My observations considering the documents
 3 are as follows ..."
 4 Then if we could -- yes, thank you so much:
 5 "The statement from Ms Elaine Tagg, the
 6 Retail Network Manager of the Post Office, at
 7 paragraph 11, stated that:
 8 "Mrs Wolstenholme persisted in telephoning
 9 the Horizon System Helpdesk in relation to any
 10 problems which she had with the system
 11 generally, these problems related to the use and
 12 general operation of the system and were not
 13 technical problems relating to the system!."
 14 Then Mr Coyne opines:
 15 "This, in my opinion is not a true
 16 representation of the evidence that I have had
 17 access to. Of the 90 or so fault logs that
 18 I have reviewed, 63 of these are without doubt
 19 system related failures. Only 13 could be
 20 considered as Mrs Wolstenholme calling the wrong
 21 support helpdesk requesting answers to 'How do
 22 I ...?' type training questions."
 23 When you saw that, that must have been very
 24 troubling, mustn't it?
 25 **A.** Yes, because we would know that Mrs -- that

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1 report was based on very limited information.
 2 **Q.** Because of Fujitsu?
 3 **A.** Yes.
 4 **Q.** So you have, on the one hand, an independent and
 5 impartial and unbiased expert and, on the other
 6 hand, you have Fujitsu disputing it but also, so
 7 it appears, withholding information, correct?
 8 **A.** Well, I wouldn't say withholding information.
 9 The information had been archived -- had been
 10 deleted or destroyed after however long,
 11 18 months.
 12 **Q.** Well, deleted or destroyed, did that not raise
 13 a red flag?
 14 **A.** That the information had -- that it had been
 15 destroyed so soon? Yes.
 16 **Q.** Well, exactly, but also --
 17 **A.** And that was -- that had been changed already,
 18 hadn't it, to seven years or whatever, or six or
 19 seven years.
 20 **Q.** Can I now move, please, to Elaine Tagg --
 21 **A.** Yes.
 22 **Q.** -- and could we please go to WITN09020115. This
 23 is Mr Coyne's statement and if we could be so
 24 kind to go to page 2. It's just underneath that
 25 "more detailed examination", et cetera,

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1 Elaine Tagg was -- obviously she would be
 2 cross-examined on her witness statement and
 3 she'd have to deal with Mr Coyne's opinion.
 4 **Q.** Well, leaving aside her being cross-examined,
 5 what about the submission of a witness statement
 6 which is so manifestly wrong?
 7 **A.** In the opinion of the expert it is wrong, yeah.
 8 That's why it -- having looked at -- that's why
 9 we obtained the advice and -- from counsel on
 10 the evidence, because statements like that were
 11 a real cause for concern.
 12 **Q.** It wasn't just the opinion of the expert that
 13 she was wrong; even Jan Holmes said it would be
 14 hard to dispute that, didn't he?
 15 **A.** Yes.
 16 **Q.** I don't need to take you to it, thank you for
 17 your concession, but the reference is
 18 FUJ00121499 at page 3.
 19 **A.** Can I just have a look at that, please?
 20 **Q.** Of course, by all means. Yes. Do you see just
 21 the last line of that statement --
 22 **A.** Yes, I just wanted to remind myself.
 23 **Q.** Do you see it?
 24 **A.** Yes.
 25 **Q.** You're happy?

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1 A. Yes.

2 Q. Right. I think Mrs Wolstenholme brought this to
3 your attention in her letter which was received
4 on 2 February 2004. Did you -- because she was
5 suggesting actually that Elaine Tagg was, shall
6 we put the euphemism, not telling the truth.
7 Did you discuss the implications of providing
8 untruthful witness statements in legal
9 proceedings with your client?

10 A. Yes, I would have done.

11 Q. What did you say?

12 A. Again, it's hard to remember from so long ago,
13 but I would certainly have highlighted that as
14 a potential -- an error and potential
15 misstatement in Ms Tagg's statement.

16 Q. Could I ask you now about Mr Baines' direct
17 involvement. We know that he was involved in
18 the acceptance of Horizon and the many
19 significant problems that still existed when it
20 was rolled out I suggest he was aware of. When
21 you go to the first witness statement of the
22 late Mr Baines, which is POL00118250, and we go
23 to paragraph 5 -- and I want to make it clear,
24 Ms Helliwell, I'm not suggesting that you are
25 a party to any impropriety here because of

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1 statements; that's what your belief was?

2 A. Yes, and I think also I could tell from the
3 typeface of Mr Holmes' statement that it looked
4 a different point at the start and then as if
5 his information had pretty much been put in.
6 I'd have -- but then I do also -- with
7 Mr Baines' second statement, him and Mr Holmes,
8 I think as it's referred to in the notes of the
9 conference, and that they were working, yeah,
10 they were exchanging information, working on
11 their statements together as well.

12 Q. So they were a double act?

13 A. They were both providing information statements
14 and --

15 Q. In tandem?

16 A. -- I think they were liaising on that, yes.

17 Q. Yes, so they were working together, they were in
18 tandem, and --

19 A. And then --

20 Q. Yeah.

21 A. -- before it came to -- before it came to --

22 Q. Before it came to you?

23 A. Mm.

24 Q. That's precisely what I wanted to establish, in
25 fairness to you, lest it be thought that you

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1 course you rely, don't you, on the information
2 which you are provided with, don't you?

3 A. Absolutely, yeah.

4 Q. Yes. But nearly every sentence in paragraph 5
5 of his witness statement, first witness
6 statement, could have been contradicted, it
7 would appear, from his own personal knowledge,
8 from what we now know. You weren't aware of
9 that at the time?

10 A. Absolutely not, no.

11 Q. No. Counsel to the Inquiry took you to the
12 handwritten notes of the conference that led to
13 this statement being produced, in which it seems
14 that Mr Baines said he would be candid about
15 glitches. Do you remember that?

16 A. I think so, yes.

17 Q. Now, what I want to just try and help me with is
18 this, because you said this morning to learned
19 Counsel to the Inquiry that you believe you
20 would have had more involvement in the actual
21 drafting of Mr Baines's witness statements.
22 I think you drew a distinction because Mr Holmes
23 was Fujitsu, Mr Baines was Post Office,
24 therefore you'd have had more involvement in the
25 actual drafting of Mr Baines' witness

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1 were, you know, being the active drafter?

2 A. No, I wasn't (unclear) on that, no.

3 Q. No. You weren't because, in fact, there is
4 an email from Mr Baines about his second witness
5 statement copied to you, in which he says that
6 it was the detail behind the assertions on
7 paragraph 5 of his first witness statement --
8 what I'm trying to suggest is that he drafted it
9 without your assistance.

10 Could we go to, please, POL00118233. There
11 we are. I think this is copied to you, isn't
12 it?

13 A. Mm.

14 Q. Sent to Ms Talbot, copied to Mr Holmes, copied
15 to you:

16 "Enclosed is a statement covering Post
17 Office's approach ensuring that Horizon was
18 suitable for use for its intended uses and
19 users. I'm also copying this to Susanne
20 Helliwell. This in general, rather than
21 specific to Cleveleys, and in effect is the
22 detail behind some of the assertions in
23 paragraph 5 of my earlier witness statement ...
24 As agreed, I haven't attempted to put this into
25 the format required by the court."

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1 So, in other words, and I mean no disrespect
2 to you, but would it be the case that he drafted
3 his second witness statement and you put it in
4 to the appropriate format?
5 **A.** Yes, I would have put it into the appropriate
6 format and asked any -- raised any questions or
7 queries I had on the information he provided --
8 **Q.** Yes.
9 **A.** -- and sent it to counsel.
10 **Q.** Did he not in fact fax it to you, as well? Do
11 you recall that?
12 **A.** Gosh, I can't remember a fax.
13 **Q.** Let's have a look at --
14 **A.** I'm sure if there's a fax here, he did.
15 **Q.** Let's have look at POL00118224, please. That's
16 the second witness statement, and could we go
17 to -- we know about paragraph 6. I'm not going
18 to take you to that again but could we go to
19 page 8, please. We can see there that he sent
20 it to you, didn't he?
21 **A.** Yes, whether it was the --
22 **Q.** That was after you put it into the format and he
23 signed it; is that right?
24 **A.** Do we know that this is the format that he -- is
25 this him sending me his initial statement or is

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1 Mandy Talbot.
2 **Q.** You don't recall making any alterations to it?
3 I mean, how could you?
4 **A.** I can't -- I just can't recall. No.
5 **Q.** No. Could I, in conclusion -- in his second
6 witness statement he admits to significant
7 problems of acceptance, touches on the subject
8 of blue screens, but he completely ignores the
9 Acceptance Incident which centred upon
10 unreliable cash accounts, doesn't he?
11 **A.** Pardon -- you'd have to just take me to that.
12 **Q.** Within his second statement. He doesn't mention
13 anything to do with unreliable cash accounts.
14 He doesn't deal with a very critical Acceptance
15 Incident which centred upon unreliable cash
16 accounts. You, of course, unless you're told
17 about serious Acceptance Incidents, you can't be
18 presumed to know.
19 **A.** No, I can't be presumed to know.
20 **Q.** No. You can't say "Well, why haven't you
21 mentioned this?"
22 **A.** No.
23 **Q.** So you were very much dependent, weren't you, on
24 the information that was provided to you?
25 **A.** Yes, absolutely. And him and Jan Holmes were

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1 it -- because that was attached to the email.
2 **Q.** Yes, that was attached to the email --
3 **A.** Because this to me would be more that he signed
4 it and faxed it back to me because I'd need
5 a signed -- at that time, I don't think we
6 really did --
7 **Q.** It doesn't appear -- yes, it was signed. So
8 this is --
9 **A.** So this is after --
10 **Q.** After you formatted it --
11 **A.** This is probably after --
12 **Q.** Yes, you formatted it, by this time, and he
13 faxes it back. So perhaps that's not so
14 important but --
15 **A.** I think that's --
16 **Q.** But the first one shows --
17 **A.** The answer to what -- that this would have
18 been -- I assume that this would have been him
19 faxing his signed statement back to me.
20 **Q.** Yes.
21 **A.** I can't be certain but that's what I assume.
22 **Q.** Initially, it looks like he drafted this
23 statement without your assistance, doesn't it?
24 **A.** Yes, and it -- his -- it was attached to that
25 email that you just showed me that he sent to

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1 providing statements dealing purely with the
2 matters that we discussed in conference --
3 **Q.** Yes.
4 **A.** -- and to do with the point that was raised by
5 Mr Lewinsky in his advice and evidence in
6 quantum on the implied term issue.
7 **MR HENRY:** Well, thank you so much.
8 **A.** Thank you.
9 **SIR WYN WILLIAMS:** Thank you Mr Henry.
10 Sorry, can we --
11 **MS PRICE:** I understand Mr Jacobs has some
12 questions, sir. Did you want to proceed or did
13 you -- it depends a little on how long Mr Jacobs
14 will be?
15 **SIR WYN WILLIAMS:** I think I can encourage Mr Jacobs
16 to conclude his questions before a break,
17 I think. Let me put it that way, Mr Jacobs.
18 **MR JACOBS:** Thank you, sir. I'll endeavour to be
19 quick.

Questioned by MR JACOBS

21 **MR JACOBS:** I act for 157 subpostmasters, instructed
22 by Howe+Co, and want to ask you about a specific
23 point. Many of my clients, if not all of them,
24 feel that Post Office's attempts in 2004 to
25 suppress Jason Coyne's expert evidence and keep

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1 that out of the public domain amounted to
2 a cover-up of the failings in the Horizon
3 System, so I want to ask you about that.

4 You said in your answers this morning to
5 Ms Price that you became specifically aware that
6 the Post Office were worried about a precedent
7 being set in the run-up to receiving counsel's
8 advice; is that right?

9 **A.** Yes.

10 **Q.** And --

11 **A.** I would have been, because that's probably one
12 of the reasons that had prompted me -- I do
13 actually refer to getting his advice after we
14 received the report, but I know that over time,
15 I would have -- yeah, prompted -- become
16 concerned.

17 **Q.** You dealt with Mr Keith Baines quite a lot,
18 didn't you, in your dealings with the Post
19 Office in this case?

20 **A.** More from the purposes of witness evidence. My
21 main point of contact was Jim Cruise and then
22 Mandy Talbot.

23 **Q.** But you took instructions from Mr Baines in
24 relation to his first witness statement?

25 **A.** For his statements, yes, but in the general
45

1 branch accounts."

2 Now, what I want to ask you is: do you
3 accept, from having Post Office as your client,
4 that the precedent issue they were worried about
5 was that other subpostmasters would latch onto
6 the fact that Post Office knew and was aware,
7 and their own expert had told them, that the
8 Horizon System had deficiencies?

9 **A.** Yes, if they had issues with other agents.

10 I wasn't aware that they had issues with other
11 agents concerning accounts. And also, I'm not
12 actually sure that I would have been -- received
13 a copy of that letter at that time.

14 **Q.** No, of course. But you say in your evidence
15 that you were aware that Post Office were
16 concerned --

17 **A.** Yes.

18 **Q.** -- that Jason Coyne's report would set
19 a precedent.

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

21 **Q.** What I'm putting to you is that the reason for
22 that precedent concern was that the Post Office
23 didn't want other subpostmasters to get wind of
24 the fact that Post Office's own expert has said
25 that there were deficiencies in the Horizon
47

1 running of the case, it would be the legal team.

2 **Q.** In relation to the precedent being set point,
3 can I refer you to a document, POL00095375. Now
4 this -- we'll wait for it to come up on the
5 screen.

6 So this is a letter from Keith Baines to
7 Colin Lenton-Smith at Fujitsu, dated 5 February
8 2004. He says, if we could perhaps scroll down
9 to the paragraph where it begins "As you will
10 see". So yes, if we go up again, I'm sorry, to
11 the last paragraph on page 1. So it says:

12 "As you will see, the expert's opinion is
13 that the Horizon System installed at the
14 Cleveleys branch was defective and that the HSH
15 was more concerned with closing calls than
16 preventing recurrence of faults."

17 Now you've heard from Mr Coyne yesterday
18 about that:

19 "As I'm sure [can be understood] Post Office
20 is concerned by these findings, not only in
21 relation to this particular case, but also
22 because of any precedent that this may set [and
23 the important bit is this] and that may be used
24 by Post Office's agents to support claims that
25 the Horizon System is causing errors in their
46

1 System?

2 **A.** Yes, and at that time, it may not have been that
3 there were any -- as I say, I wasn't aware of
4 any other issues, but they wouldn't want that to
5 be set -- a precedent to be set for any future
6 issues should they arise.

7 **Q.** So is it fair to say, and you may or may not be
8 able to answer this question of course, that
9 Post Office were, from what you observed,
10 involved in covering up Horizon deficiencies
11 from subpostmasters from 2004?

12 **A.** I can't say that I was involved.

13 **Q.** But that was their precedent concern, wasn't it?

14 **A.** It wasn't a matter of covering up and
15 Mrs Wolstenholme could be very -- obviously she
16 was entitled to be very vocal and tell anybody
17 about this particular -- the County Court
18 proceedings, so she could have told anybody
19 about the findings of the report anyway. All
20 I know is that they were concerned about adverse
21 publicity and wouldn't wish for that to go
22 against them, you know, in terms of any future
23 potential claims.

24 **Q.** In any future cases?

25 **A.** Yes, but not that they were aware -- or I was
48

1 aware of any at that time.

2 **Q.** Thank you.

3 Um --

4 **A.** I think I also mentioned before as well that,

5 certainly, the people that I dealt with, you

6 know, one view was that this report was based on

7 just a very, very limited amount of

8 documentation and that, for all we knew, the

9 outcome of such a report could have been

10 different had he had access to all the data, but

11 that's just -- that was possibly something that

12 I got the impression from the legal team.

13 **Q.** Did you hear Mr Coyne give evidence yesterday?

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

15 **Q.** You said that one view was that his report was

16 limited because of him being given limited

17 information.

18 **A.** Mm, yes.

19 **Q.** But do you accept that there is another view,

20 which happens also to be Mr Coyne's view: that

21 it was a perfectly valid report?

22 **A.** Oh, absolutely, yeah. Yeah, based -- yeah, it

23 was a valid report based on the information he

24 had.

25 **Q.** Can I go to -- and I apologise for showing this

49

1 the autumn of 2003?

2 **A.** That's what I thought, sir, yes.

3 **MR JACOBS:** Thank you, sir.

4 **A.** So he'd have actually done this without the

5 benefit, you know, without having sight of

6 Mr Coyne's report.

7 **Q.** Were you concerned that the account that

8 Mr Baines was giving in that statement, were you

9 later concerned that that couldn't be borne out

10 after Mr Coyne's expert report came out?

11 **A.** I would have been because, again, that would

12 have prompted the -- even more so the need to

13 get counsel's advice on the evidence because

14 I had our statements, I had Mr Coyne's report

15 and it's how our witnesses could deal with those

16 statements in the context of the report from

17 Jason Coyne.

18 **Q.** You have said that you discussed these matters

19 with your supervising partner.

20 **A.** Mm.

21 **Q.** What was his name? Was that Neil Kelly, who you

22 mentioned before?

23 **A.** This is the -- this is probably what I struggle

24 to remember because, at the time, he was my

25 supervising partner but then we also had

51

1 one more time -- Mr Baines' first witness

2 statement paragraph 5.

3 **A.** Right.

4 **Q.** I will be very quick on this point. POL0095374.

5 You'll probably know this by heart now. Just

6 waiting for it to come on screen. Here we are.

7 So paragraph 5, please. Now, you'd

8 obviously read Mr Coyne's report at the time

9 that this was drafted. Were you concerned that

10 what Mr Baines was saying at paragraph 5 wasn't

11 actually true?

12 **A.** What was the date of this statement?

13 **Q.** Now I'm afraid I'm not able to help you with

14 that.

15 **A.** Oh. Can I -- can you go back to the top? To

16 the first --

17 **Q.** Let's go back to the top, shall we, please.

18 Again, it doesn't assist us.

19 **A.** Right. Can I just check, though, that --

20 weren't the first set of witness statements

21 served before Mr Coyne's report? I can't

22 remember.

23 **Q.** Well, if that's the case then that's the case.

24 **A.** I don't know, yeah --

25 **SIR WYN WILLIAMS:** I reckon that this statement is

50

1 a partner who was responsible for that

2 particular client, Post Office, and that could

3 have been David Jacks, who is referred to

4 earlier on. So I don't, you know, I may have

5 discussed it with both of them.

6 **Q.** So either or both of David Jacks or Neil Kelly?

7 **A.** Mm.

8 **Q.** Did Weightmans act for Post Office in other

9 cases that were ongoing against subpostmasters?

10 **A.** My understanding at the time was that they acted

11 more on the employment claims.

12 **Q.** All right.

13 **A.** But they would have done, obviously this is

14 a litigation matter, commercial litigation

15 matter. So they would have had some dealings

16 but then, as you saw, the proceedings were

17 started by Consignia, by the in-house team, and

18 that may be what had happened. Maybe that was

19 what had happened on the commercial litigation

20 side initially.

21 **Q.** Did Weightmans view Post Office as

22 a particularly big client or important client?

23 **A.** At the time they were but I remember more

24 specifically on the employment side more than

25 anything, but that's just my recollection at the

52

1 time.

2 **Q.** Do you think that Jason Coyne's report is

3 something that would have been disclosable in

4 any future proceedings in which your firm had

5 acted against -- had acted for Post Office

6 against subpostmasters?

7 **SIR WYN WILLIAMS:** I'm going to stop you there,

8 because there are so many possible permutations

9 that that's almost an impossible question --

10 **A.** That's a very difficult question to answer,

11 that.

12 **MR JACOBS:** All right. I'll withdraw that question.

13 Sir, I don't have any further questions to

14 ask. Thank you.

15 **SIR WYN WILLIAMS:** Thank you, Mr Jacobs.

16 Thank you, Ms Helliwell, for your evidence

17 to the Inquiry and your witness statement and

18 your forbearance in coming back this morning as

19 opposed to finishing your evidence yesterday

20 afternoon. I'm grateful to you.

21 **THE WITNESS:** It's a pleasure. Thank you.

22 **SIR WYN WILLIAMS:** So we'll take our morning break,

23 yes, Ms Price?

24 **MS PRICE:** Yes, sir. Mr Beer will be asking

25 questions of Mr Lenton-Smith next, so if we

53

1 investigation. Thank you also for previously

2 providing a witness statement. Can you open

3 that witness statement, please. I think it's

4 the first tab in the binder in front of you.

5 **A.** Yes.

6 **Q.** It's dated 22 May 2023 and, if you turn to

7 page 14, is there a signature?

8 **A.** There is a signature, yes.

9 **Q.** Is it yours?

10 **A.** It's my signature, yes.

11 **Q.** Are the contents of that statement true to the

12 best of your knowledge and belief?

13 **A.** They are, yes.

14 **Q.** For the transcript, the URN is WITN08590100. No

15 need to display that. I am going to ask you

16 some questions this morning and this afternoon

17 Mr Lenton-Smith, principally about your role in

18 the claim brought by Mrs Julie Wolstenholme, who

19 ran the Cleveleys post office in Lancashire, but

20 also some broader issues about the provision of

21 litigation support by Fujitsu, and in its

22 predecessor guise as ICL Pathway Limited, to the

23 Post Office.

24 **A.** Yes.

25 **Q.** Can I start with your background, please. You

55

1 could take a 10-minute break I think that takes

2 us to 11.30.

3 **SIR WYN WILLIAMS:** I think we'll have 15 minutes if

4 you don't mind.

5 **MS PRICE:** Of course.

6 **SIR WYN WILLIAMS:** Okay. 11.35, then.

7 **MS PRICE:** 11.35, sir.

8 **SIR WYN WILLIAMS:** Fine. Thank you.

9 (11.16 am)

10 (A short break)

11 (11.35 am)

12 **MR BEER:** Good morning, sir. Can you see and hear

13 me?

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

15 **MR BEER:** May I call Colin Lenton-Smith, please.

16 **SIR WYN WILLIAMS:** Of course.

17 **COLIN EDWARD LENTON-SMITH (sworn)**

18 **Questioned by MR BEER**

19 **MR BEER:** Good morning, Mr Lenton-Smith, my name is

20 Jason Beer and I ask questions on behalf of the

21 Inquiry. Can you give us your full name,

22 please?

23 **A.** Yes, it's Colin Edward Lenton-Smith.

24 **Q.** Thank you very much for coming to give evidence

25 to the Inquiry today and assisting us in our

54

1 tell us in your witness statement that you

2 qualified as a member of the Institute of

3 Chartered Accountants and worked in industry

4 from 1979; is that right?

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

6 **Q.** If you just move forward a little bit the

7 microphone will pick you up a bit better.

8 That's it. Thank you.

9 You joined ICL Computers, or ICL, in 1990 as

10 a commercial manager within the international

11 division; is that right?

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

13 **Q.** Was that preceded by some work in the IT

14 industry from about 1985?

15 **A.** Yes, I had worked for the computer company Wang

16 for four or five years previously before joining

17 ICL.

18 **Q.** You tell us that you worked for ICL Pathway

19 Limited from March 2001; is that right?

20 **A.** That's right, yes.

21 **Q.** Before then, had you had any involvement in the

22 project which became known as Horizon?

23 **A.** No, none at all.

24 **Q.** At that time, March 2001, you joined ICL Pathway

25 Limited as the Commercial and Finance Director?

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1 A. Yes, it wasn't a registered directorship in
 2 terms of registering at Companies House but it
 3 was a position given the seniority of the
 4 function, so it was leading the function of the
 5 commercial and the finance functions.
 6 Q. Did you take over in that position from Anthony
 7 Oppenheim?
 8 A. In that functional role yes, but not as
 9 a director of Pathway.
 10 Q. He was a director of Pathway, I think?
 11 A. I believe so.
 12 Q. Did you stay in that role as director until
 13 October 2007?
 14 A. I did, yes. Well, it changed. The role changed
 15 from being a finance and commercial
 16 responsibility to simply commercial.
 17 Q. What did you do after October 2007?
 18 A. I then worked for another multinational contract
 19 that Fujitsu had taken with an international
 20 company to manage that contract.
 21 Q. Until your retirement in, I think, September
 22 2018 --
 23 A. Yes.
 24 Q. -- did you have any further involvement with the
 25 Horizon Programme?

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1 at the specific three elements you described
 2 there, litigation support to the Post Office?
 3 A. Within numeric constraints. So I believe, just
 4 as I started, a number of audit requests were
 5 made available, a negotiated position that
 6 Fujitsu then -- or ICL Pathway then provided to
 7 Post Office. I think it was 50 around that
 8 time.
 9 Q. What about anything more fundamental than that?
 10 So rather than the number per month or year of
 11 packets of audit data, anything more fundamental
 12 in the contract, was it your understanding that
 13 the contract contained any such provisions?
 14 A. I think it was -- there was a letter from Martyn
 15 Bennett to Post Office, which I believe -- there
 16 was an agreement reached on limiting a general
 17 statement on provision of information to these
 18 number of requests, but I can't recall whether
 19 there was anything wider than that.
 20 Q. Okay. If we just go a the page to paragraph 4,
 21 you say, as the Commercial Director:
 22 "My role involved managing an autonomous
 23 finance team and a small commercial team to
 24 contract manage the Horizon contract with Post
 25 Office and to execute contract changes for [some

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1 A. None at all.
 2 Q. So we're principally interested in the period
 3 March 2001 until October 2007 --
 4 A. Right.
 5 Q. -- about six and a half years.
 6 A. Yes, that's correct.
 7 Q. If you can turn up your witness statement,
 8 please, WITN0590100, and look, please, on
 9 page 2, at the bottom of the page, paragraph 5.
 10 You say:
 11 "Regarding Post Office Limited, legal action
 12 against [subpostmasters], as part of the service
 13 for Horizon, Fujitsu provided support to [the
 14 Post Office] as and when required in the form of
 15 audit data, witness statements and if required,
 16 appearances in court. Outside of the standard
 17 service [the Post Office] may request Fujitsu to
 18 provide special assistance."
 19 So you say here that Fujitsu provided
 20 support in the form of audit data, witness
 21 statements and court appearances to support
 22 legal action against subpostmasters. Was it
 23 your understanding that that was part of the
 24 contract between the Post Office and Fujitsu,
 25 that required, in general terms, without looking

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1 things]."
 2 Yes?
 3 A. Yes, that's right.
 4 Q. So was your job essentially managing the
 5 contract?
 6 A. It was managing the contract, yes. Well, it was
 7 managing the contract from a commercial
 8 perspective, so that my opposite number in the
 9 Post Office, Keith Baines, we would have
 10 discussions about the points of the contract and
 11 these would be discussed or issues that were
 12 raised would be discussed through Commercial
 13 Forum, monthly, I believe, but periodically, to
 14 deal with issues that arose from the contract.
 15 Q. So at the time, you would have been very
 16 familiar with the terms of the contract between
 17 the Post Office and Fujitsu?
 18 A. Yes.
 19 Q. Can we look at, I think, the letter to which you
 20 were referring, FUJ00155527. Just forgive us
 21 a moment. Thank you.
 22 This is indeed a letter to Charles Leighton
 23 from Martyn Bennett. If we just look at the
 24 letter generally to start with and look at the
 25 foot of the second page -- thank you -- you'll

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1 see that it's written by Martyn Bennett, the
2 Quality Director within ICL.

3 Then go back to the first page. It's
4 written to Charles Leighton, the Internal Crime
5 Manager in Post Office, and it's dated
6 6 February 2001.

7 We'll see in a moment that this concerns
8 contractual provisions and, most specifically,
9 the Post Office's need to have Fujitsu staff
10 produce witness statements for the purposes of
11 legal proceedings. So this is dated February
12 2001, that's about a month before you took up
13 position; is that right?

14 **A.** That's right.

15 **Q.** Is that an issue with which you became familiar
16 when you took up your post?

17 **A.** I find it -- I'm finding it difficult to
18 remember that, specifically. Working backwards
19 from the fact that we had contracted for
20 a number of audit requests and that was
21 an ongoing discussion with Post Office
22 Commercial in terms of providing more --
23 increasing the number. There are, in the
24 minutes of the Commercial Forum later on, there
25 are points about increasing DWP support for --

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1 maybe that was passed over to other functions,
2 such as the audit manager, but I'm not sure
3 there was a specific Quality Director during my
4 time there.

5 **Q.** So he wasn't a part of your team, Mr Bennett?

6 **A.** Not part of my team, no. Part of the commercial
7 team -- not part of the commercial team.

8 **Q.** He was not part of the commercial team?

9 **A.** No.

10 **Q.** Was he working in the same office as you?

11 **A.** He may have been working in Feltham, which is
12 where we were based. But --

13 **Q.** That's what the letterhead suggests.

14 **A.** Yeah, but I don't recall him -- I think he must
15 have left that position around that -- around
16 March, because I just can't recall his being
17 around at the time.

18 **Q.** If we look at the foot of the second page,
19 please, we'll see to whom the letter was copied
20 and we'll see that it was copied to Tony
21 Oppenheim, your immediate predecessor?

22 **A.** Yes.

23 **Q.** Presumably you received some sort of handover
24 from Mr Oppenheim?

25 **A.** Yes, I did.

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1 support, litigation support. So I think it was
2 an ongoing position that we started at 50, which
3 I think is what this letter and I think Keith
4 Baines, one of his submissions refers to as 50,
5 but I think they increased over time. I can't
6 remember specifically the numbers we got to but
7 it was a topic for discussion.

8 **Q.** This is about witness statements --

9 **A.** Witness statements, yes.

10 **Q.** -- in particular, rather than the provision of
11 audit data.

12 **A.** Yeah.

13 **Q.** Was that an issue with which you became
14 involved, when you took up to post a month after
15 this letter was written?

16 **A.** Not specifically, no.

17 **Q.** Who -- we saw that Mr Bennett was described as
18 the Quality Director at ICL. Was he a person
19 who you knew within ICL?

20 **A.** No, he had left -- he left almost immediately
21 after I joined, and --

22 **Q.** What was the role of Quality Director? What
23 does that mean?

24 **A.** Well, it wasn't a -- it's not a function that
25 I recognise existing at the time. I recall that

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1 **Q.** Would that include passing over of files?

2 **A.** There would have been correspondence handed
3 over, yeah.

4 **Q.** So we can assume that this would -- you will
5 have no specific memory, but this is the kind of
6 thing that would be handed over?

7 **A.** Yeah, I mean if there's a copy of this letter,
8 a hard copy of this letter on file within the
9 commercial library of information, then I would
10 have had that copy.

11 **Q.** Can we go back to the first page, please. I am
12 going to spend a little time on the letter.

13 **A.** Okay.

14 **Q.** If I may, because this is a new document to the
15 Inquiry, received relatively recently, and I'm
16 going to, therefore, given the importance of the
17 issue, look at it carefully. You'll see the
18 heading is "Witness Statement Request", and
19 Mr Bennett says:

20 "I am writing to respond to the exchange of
21 emails between yourself and Graham Hooper
22 recently re your request for the provision of
23 witness statements."

24 Can you recall who Graham Hooper was?

25 **A.** Yes, I do, yes.

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1 Q. What was your recollection of the function that
 2 he performed?
 3 A. He worked with Jan Holmes in the audit area,
 4 which included the provision of witness
 5 statements.
 6 Q. Some of the documents have got him signed off,
 7 including in an email signature block, as
 8 a Security Manager within the Security Team at
 9 ICL?
 10 A. Okay, I can't --
 11 Q. Does that jog your memory?
 12 A. You've jogged my memory. I didn't remember
 13 offhand what it was, but I think clearly that
 14 was his role.
 15 Q. Was he someone that you dealt with on
 16 occasion --
 17 A. On occasion I --
 18 Q. -- given your role --
 19 A. Yes.
 20 Q. -- ie when an issue over the contract arose that
 21 concerned the function that he was performing?
 22 A. Yes. So if there was material to be gained --
 23 to be put together in response to a commercial
 24 issue that the commercial department in Post
 25 Office would have raised, then in formulating

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1 that POCL sees this requirement as an open-ended
 2 obligation on Pathway to produce information
 3 related 'witness statements' at POCL's request.
 4 This is not how we see it. The requirement is
 5 that relevant information produced by the
 6 Horizon System at POCL's request be admissible
 7 evidence in Court (which so far as such
 8 information in itself can be, it is) and capable
 9 of certification in accordance with PACE (or
 10 equivalent in Northern Ireland and Scotland).
 11 As you are no doubt aware, the relevant sections
 12 of PACE (s69 and s70) were repealed by the Youth
 13 Justice and Criminal Evidence Act 1999, which
 14 came into force on 14 April 2000."
 15 So having cited the relevant provision of
 16 the codified agreement -- I think he's citing
 17 from version 3 of the codified agreement
 18 there -- he sets out ICL's interpretation of the
 19 provision, which is that relevant information
 20 produced by Horizon should be admissible
 21 evidence in court and capable of certification.
 22 Do you recall that being ICL's interpretation of
 23 the relevant part of the contract?
 24 A. No. Not when this was written because it was
 25 before I started.

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1 the response, he might have been part of that,
 2 bringing that together, the information that we
 3 then responded back to Post Office with.
 4 Q. So this Mr Bennett, the Quality Director,
 5 writing to the Internal Crime Manager in the
 6 Post Office saying, "You've exchanged some
 7 emails between a Security Manager within us,
 8 ICL" ?
 9 A. Yes.
 10 Q. He says:
 11 "I believe that the relevant provision is
 12 Requirement 829/1 which states:
 13 ""The CONTRACTOR shall ensure that all
 14 relevant information produced by the POCL
 15 Service Infrastructure at the request of POCL
 16 shall be evidentially admissible and capable of
 17 certification in accordance with the Police and
 18 Criminal Evidence Act (PACE) 1984, the Police
 19 and Criminal Evidence (Northern Ireland) Order
 20 1989 and equivalent legislation covering
 21 Scotland'."
 22 So this mentions the relevant requirement in
 23 the contract?
 24 A. Yes.
 25 Q. "My concern [he says in the fourth paragraph] is

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1 Q. Did you discuss this issue with Tony Oppenheim
 2 when he left or as part of the handover?
 3 A. Not that I recall.
 4 Q. Did you ever have cause to look at this part of
 5 the contract in the coming months and years?
 6 A. Not that I recall.
 7 Q. Let's carry on, in substantive paragraph 5:
 8 "We have made our position with respect to
 9 requirement 829 clear on a number of occasions.
 10 However, given that you seem surprised by the
 11 stance taken by Graham Hooper, it may be of
 12 assistance if I set out some of the background.
 13 The issue of witness statements was discussed in
 14 meetings between Barry Proctor (then our
 15 Security Manager) ..."
 16 Do you remember Barry Proctor?
 17 A. No, I don't.
 18 Q. Bob Martin, recall him?
 19 A. No.
 20 Q. Paul Harvey, remember him?
 21 A. No.
 22 Q. "... in July 1999. It was made clear in those
 23 meetings that Pathway did not consider the
 24 production of witness statements to be included
 25 in the scope of the requirement. An Acceptance

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1 Incident (370) was raised by POCL (Bob Booth) on
 2 23 July 1999 and a clearance action for this
 3 incident was agreed as follows ..."

4 Can you recall what Acceptance Incidents
 5 were?

6 **A.** I think these were incidents that were raised
 7 during the acceptance process of the Horizon
 8 software.

9 **Q.** Do you recall anything more about what
 10 an Acceptance Incident, an AI, was?

11 **A.** No.

12 **Q.** In any event, the AI was agreed as follows:

13 "Pathway will provide PACE statements as
 14 necessary to support a fraud prosecution.
 15 Pathway will update the work required to produce
 16 draft witness statements when POCL have raised
 17 an appropriate Change Request, as indicated in
 18 the letter from Barry Proctor to Paul Harvey
 19 dated 8 June 1999. The reason why this is
 20 necessary is because Pathway has no contractual
 21 obligation to provide POCL with any evidence to
 22 support a prosecution'."

23 So these are all events that predated your
 24 time in your position, yes?

25 **A.** Yes.

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1 (as above). POCL has never submitted the
 2 required change [notice] hence my negative
 3 response to your request to Graham Hooper for
 4 draft witness statements."

5 When you joined, a month after this letter
 6 was written, did you know that the Post Office
 7 was supposed to have produced a change notice,
 8 ie tabling a change to the contract, but that it
 9 had failed to do so?

10 **A.** Not specifically. I can only surmise that it
 11 eventually did happen because the issue of
 12 witness statements became a change to the
 13 contract, so this point I was talking about, the
 14 limit of 50, would have been dealt with through
 15 a change request.

16 **Q.** So it's a separate issue, the provision of audit
 17 data. We're at the moment looking at the
 18 provision of witness statements.

19 **A.** Again, I can't specifically recall the change,
 20 but I can -- I believe that that would have
 21 happened in order to come to an agreement that
 22 we would produce, or that Fujitsu would produce
 23 witness statements, however numbered they
 24 were -- however numbered they were going to be,
 25 that would have been dealt with through a change

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1 **Q.** Did you know that the Post Office was supposed
 2 to produce a change notice to make provision for
 3 the production of witness statements?

4 **A.** Well, that would have been a natural change to
 5 the contract. So any change to the contract
 6 would have gone through the change control
 7 process and, if Post Office wanted to provide
 8 for that or request that, then they would have
 9 issued this change request, which would have
 10 gone through, impacting an assessment and come
 11 to a commercial arrangement, and that would then
 12 have been included -- drafted into the contract
 13 as a change.

14 **Q.** So what this is saying is that an Acceptance
 15 Incident was raised with agreed wording and,
 16 amongst that, it was agreed that, because the
 17 contract includes no obligation to provide the
 18 Post Office with any evidence to support
 19 a prosecution, it's necessary for the Post
 20 Office to raise a change to the contract through
 21 a change notice?

22 **A.** Yes, exactly.

23 **Q.** The letter continues:

24 "The statutory requirement for PACE
 25 statements and certification no longer exists

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1 request. So any change to the contract would
 2 have been done through a change control, through
 3 a change request, and then a change to the
 4 contract.

5 **Q.** In the answer before last you said, "I would
 6 surmise that" --

7 **A.** Well, I surmise it in the fact that I wasn't
 8 around when this was -- the fact that they
 9 had -- you're suggesting that they hadn't
 10 produced it or this letter says they hadn't
 11 produced it. I wasn't aware that they hadn't
 12 produced it and all I can suggest is that,
 13 because we were doing it later, that a change
 14 request would then have subsequently been
 15 issued, that we would have then impacted and
 16 then bought into the contract.

17 **Q.** Okay well, we'll look at the rest of the letter
 18 to see whether that follows at all because what
 19 we'll see is that there's a without-prejudice
 20 agreement to produce witness statements.
 21 I don't think we've got a change notice in any
 22 of the disclosure that we've got.

23 **A.** Really? Okay.

24 **Q.** You're essentially putting two and two together
 25 and saying they equal four because "We must have

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1 had a change notice because we produced witness
2 statements"?

3 **A.** That's what I'm saying, yes. That doesn't
4 necessarily follow but it's kind of a logical
5 path.

6 **Q.** Okay. The letter continues:

7 "In answer to your query as to what change
8 could be requested, the Change Request would
9 either be for a particular statement required by
10 POCL, or (which would appear the more sensible
11 option) to change Requirement 829 such that it
12 incorporates a more general obligation to
13 produce witness statements. Any such Change
14 Request would be subject to impact assessment
15 and costing in the usual way."

16 So what this is saying is that, "Because
17 there's a change to the contract here, we'll
18 have to assess its impact and work out how much
19 we're going to charge you for it"?

20 **A.** Yes.

21 **Q.** Mr Bennett continues:

22 "As things happened, [AI370] was not closed
23 on the basis of the clearance action referred to
24 above. It was closed instead, without
25 concession by Pathway, on the basis of agreement

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1 the AI was concerned with the production of
2 draft witness statements, it was actually closed
3 off by a different agreement relating to the
4 provision of audit data.

5 **A.** Yes.

6 **Q.** Therefore, the witness statement issue remained
7 outstanding?

8 **A.** Yes.

9 **Q.** He continues in the last paragraph:

10 "I trust that the above makes Pathway's
11 contractual position clear. In accordance with
12 your email to Graham Hooper of 10 January
13 stating that you 'would be happy to agree to
14 accept the cost to produce the Statements on
15 a "without Prejudice subject to Contract" basis
16 at this time, pending the outcome Commercial
17 discussions', Pathway is willing to provide
18 witness statements. However, I emphasise that
19 this is without prejudice to the above position
20 and Pathway does not accept that it is
21 contractually obliged to do so."

22 Were you aware of that without prejudice
23 agreement when you took over a month after this
24 letter was written?

25 **A.** I can't remember that specific detail.

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1 between POCL and Pathway concerning access to
2 audit information. The background to the audit
3 information agreement (as you are probably
4 aware) is that during the first few months of
5 2000 there was discussion and correspondence
6 about the requirement to produce audit
7 information to support investigations. This
8 culminated in agreement in principle being
9 reached at a meeting on 29 March 2000 that
10 Pathway would provide up to 50 audit data
11 extractions per annum for audit and security
12 investigation purposes, with a maximum of 7 in
13 any calendar month. The basis of the agreement
14 was described in more detail in my letter of
15 24 May 2000 to Keith Baines and confirmed
16 subsequently in connection with closure of
17 [AI370] in September 2000 ..."

18 He provided the documents:

19 "Pathway has been providing access to audit
20 information in accordance with the agreed limits
21 and other matters set out in that letter (in
22 relation to which, by way of further
23 confirmation of the agreed arrangement, Pathway
24 will raise a [change notice])."

25 So what he's saying here is that, although

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1 **Q.** Over the next six and a half years, were you
2 aware of any change in the contract, whether
3 raised by a change notice or otherwise, that
4 made specific provision for the production of
5 witness statements?

6 **A.** My memory is not good enough to remember
7 specific details about the witness statements.

8 **Q.** I understand. So let's move on, please, and see
9 what happened. Can we look, please, at
10 FUJ00121788. If we scroll down just a little
11 bit further, we can see this is a letter from
12 Mr Hooper, the Security Manager, dated
13 8 September -- if we just scroll up a little bit
14 please -- 2001, so when you're in post --

15 **A.** Yeah.

16 **Q.** -- to Mr Leighton, the Internal Crime Manager,
17 about the Higher Broughton Post Office, saying:

18 "Dear Charles

19 "Please find enclosed as requested a witness
20 statement in respect of Higher Broughton Post
21 Office. This has been produced under our
22 'without prejudice' agreement as outlined in
23 Martyn Bennett's letter to you of 6 February
24 2001.

25 "Thank you for your acceptance that POCL

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1 will be charged on a Time and Materials basis
 2 for this work."
 3 If we skip over the page we can see there is
 4 a witness statement --
 5 **A.** Yes.
 6 **Q.** -- and it goes on for pages and pages, okay?
 7 **A.** Yeah.
 8 **Q.** Going back to the first page, then. We can see
 9 that the witness statement is being produced
 10 under the without-prejudice agreement that's
 11 recorded in the letter of 6 February that we've
 12 just looked at.
 13 **A.** Yes.
 14 **Q.** As part of your commercial responsibilities were
 15 you aware that the Post Office had agreed to pay
 16 ICL on a time and materials basis --
 17 **A.** I do remember that, yes.
 18 **Q.** -- for support in pursuing prosecutions --
 19 **A.** Yes.
 20 **Q.** -- including the provision of witness
 21 statements?
 22 **A.** Yes.
 23 **Q.** Can you recall when into the process you
 24 discovered that?
 25 **A.** Can you see who is copied on this letter?

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1 non-criminal investigations, ie civil
 2 litigation?
 3 **A.** I can't recall whether there was a distinction.
 4 **Q.** Were you aware of any formal policy within
 5 Fujitsu or any protocol between Fujitsu and the
 6 Post Office that carried the arrangements that
 7 we see here into effect?
 8 **A.** No. I mean, there are quite a lot of
 9 documentation around the contract, contract
 10 reference documents, and various other
 11 documentation, and I can't specifically
 12 remember -- I mean, there's quite a lot of them.
 13 It was a long time since I've seen the list of
 14 such documentation. I didn't notice any in the
 15 bundles.
 16 **Q.** We've given you copies of the codified
 17 agreements that are relevant to this time, and
 18 I'll look at one of those just very briefly in
 19 a moment. What I'm essentially asking is: were
 20 you aware of any policy within Fujitsu that
 21 said, "We've taken on this function, these are
 22 the standards that are going to be applied,
 23 these are how those standards are going to be
 24 achieved, this who is going to do what and this
 25 is how we're going to do it"?

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1 **Q.** I don't think there's any copy, if you scroll
 2 down. I should say that there's lots of these
 3 letters throughout your period in office --
 4 **A.** Yes.
 5 **Q.** -- providing witness statements. This is just
 6 an example where Mr Hooper, or the author of the
 7 letter, says, "Here's a witness statement, I'm
 8 providing on the basis of the without-prejudice
 9 agreement in the letter of 6 February".
 10 **A.** Yes, I suspect that I would have been aware of
 11 the fact because, as a commercial issue, we'd
 12 have to charge -- the finance function was part
 13 of my function -- of my responsibility and,
 14 therefore, we would be responsible for billing
 15 the Post Office for the time and materials.
 16 **Q.** So what was happening was that ICL was providing
 17 litigation support, not pursuant to
 18 a contract -- because it argued that the
 19 contract didn't require it --
 20 **A.** Yes.
 21 **Q.** -- but pursuant to a without-prejudice agreement
 22 contained in a letter?
 23 **A.** Yes.
 24 **Q.** Were there any similar arrangements in place for
 25 the provision of litigation support for

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1 **A.** I couldn't -- I can't name a document
 2 specifically that would do that.
 3 **Q.** Would you expect there to be --
 4 **A.** I would expect there to be a document. My view
 5 of Pathway's internal documentation and controls
 6 was I thought it was very good. It was well
 7 documented -- all the processes were well
 8 documented. I would expect that Graham Hooper,
 9 as Security Manager, there would have been
 10 security policies and audit policies that
 11 Pathway would have followed, as a matter of
 12 course. It's not something that would be left
 13 floating, so there would be specific -- could
 14 well be a specific document. I would expect
 15 there to be a specific document within the
 16 library that would set out what we were going to
 17 do in this instance.
 18 **Q.** How it was going to be done and who was going to
 19 do it?
 20 **A.** Exactly.
 21 **Q.** Because, as you say, it can't just be left
 22 floating?
 23 **A.** No, it was a common methodology that there was
 24 such -- all the policies and procedures that
 25 followed were, I thought, in my view, well

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1 positioned as a controlling mechanism of how the
2 account was run.

3 **Q.** Can we look, then -- we're going to look at
4 three documents that perform a similar function,
5 if they had been either issued as operative
6 guidance or actually carried into effect. Can
7 we start, please, with FUJ00152140.

8 Again, I'm going to spend a little time on
9 this document as it's a new document for the
10 Inquiry, received by us after all of the
11 relevant witnesses in Phases 2 and 3 had given
12 their evidence. Can you see the title to the
13 document "Evidential Information -- Production,
14 Certification and Retention"?

15 **A.** Yes.

16 **Q.** That looks quite hopeful, doesn't it, in terms
17 of performing the function that you just spoke
18 about?

19 **A.** Yes.

20 **Q.** Then look at the "Abstract":

21 "A description of the process required to
22 demonstrate the integrity of a PACE certificate
23 and the associated declaration."

24 Again, that looks quite hopeful, doesn't it?

25 **A.** Yes, yes.

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1 **Q.** -- to which you would have had access?

2 **A.** Err ... I'm just pausing because I'm not sure
3 whether the library -- the library was
4 controlled by the project office and by the
5 change control functions. So it was part of the
6 documentation set that they managed. So it
7 would have been available on request but I'm not
8 sure that it was simply a document -- simply
9 a library that one could just dial up and look
10 at documents.

11 **Q.** How would you know whether to look for
12 a document in a library if you didn't have
13 access to the library?

14 **A.** It's a good question. I can't remember how the
15 library was managed. It was part of the
16 infrastructure sort of function that supported
17 software and services. It was the change
18 control function.

19 **Q.** Okay. I'll move on. Can we go to page 4,
20 please. We can see the "Introduction". There's
21 some three passages on this page that I'm going
22 to draw your attention to, that may suggest --
23 I'd like your view -- that this is a policy or
24 a process document that's about benefit payment
25 fraud prosecutions, not the prosecution of

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1 **Q.** If we scroll down, please, to see who it was
2 authored by, you'll see its status, first, is an
3 "Initial draft". I ought to have said the date
4 at the top right was 4 August 1988.
5 I appreciate these are before your time, by some
6 margin.

7 You'll see that it's authored by Barry
8 Proctor and the distribution includes Graham
9 King; Matthew Cooper, from Alliance & Leicester;
10 Graham Hooper, from Alliance & Leicester; Pete
11 Spence; Alan D'Alvarez; Christopher Billings;
12 Dave Campbell (ICL Outsourcing); Martyn Bennett
13 and the Library. This, of course, is a few
14 years before you took up your position and,
15 therefore, you're not mentioned at all.

16 Just a couple of questions. Do you recall
17 what ICL Outsourcing was?

18 **A.** Yes, I believe it was the procurement function
19 for Fujitsu at the time.

20 **Q.** So procuring --

21 **A.** Third-party services.

22 **Q.** You'll see that one of the places to which it
23 was distributed was a library. Was that
24 an intranet library --

25 **A.** It was an intranet library, yes.

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1 subpostmasters for theft or false accounting.

2 So can you see in the first sentence:

3 "Prima facie evidence to be presented for
4 benefit payment fraud prosecutions is obtained
5 solely from the ICL Pathway Fraud Case
6 Management System (FCMS). This computer output
7 is only admissible in evidence where special
8 conditions are satisfied. These conditions are
9 described in detail in Section 69 of [PACE] and
10 require ICL Pathway to provide 'honest'
11 certification of such computer-generated
12 evidence."

13 Would you agree that the first sentence
14 appears to restrict the coverage provided by
15 this document to benefit fraud payment
16 prosecutions?

17 **A.** Well, the topic is about benefit payment fraud
18 prosecutions, yes.

19 **Q.** Well, let's look under "Scope", then:

20 "This process describes the PACE
21 certification of computer evidence originating
22 within the ICL Pathway [FCMS] to support benefit
23 payment prosecutions."

24 The last part of that sentence again
25 suggests that this is all about benefit payment

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1 fraud prosecutions, wouldn't it?
 2 **A.** It would seem so, yes.
 3 **Q.** If we just scroll down to paragraph 4 at the
 4 bottom, under "Certification":
 5 "Irrespective of the number of fraud
 6 prosecutions that the ICL Pathway FCMS supports,
 7 a PACE certificate must be provided for each
 8 individual prosecution."
 9 So that's probably the third indication, the
 10 first part of that sentence, which again
 11 suggests that this document was all about fraud
 12 prosecutions involving benefit payments, agreed?
 13 **A.** It would seem so, yes.
 14 **Q.** So, on the face of it, not much to do with the
 15 prosecution of subpostmasters for theft by them
 16 or false accounting by them?
 17 **A.** On the face of it, yes.
 18 **Q.** Can we now look at a later iteration of the
 19 policy, please, FUJ00152142. You'll see that --
 20 and, again, this document is new to the Inquiry.
 21 Can you see that the title and the abstract are
 22 the same?
 23 **A.** Yes.
 24 **Q.** It's moved from being an initial draft to a
 25 draft?

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1 left-hand document was all about benefit payment
 2 fraud, that they've gone? So in the
 3 "Introduction", it says:
 4 "Prima facie evidence to be presented in
 5 support of criminal prosecutions ..."
 6 **A.** Yes.
 7 **Q.** So the restriction or limitation of benefit
 8 payment fraud prosecutions has gone.
 9 **A.** It has, yes.
 10 **Q.** Can you see, under "Scope", whereas the last
 11 line of the first paragraph of "Scope" suggested
 12 that the policy related to support benefit
 13 payment fraud prosecutions, in the third line of
 14 "Scope", that's been changed to "to support
 15 criminal prosecutions"?
 16 **A.** It has, yes.
 17 **Q.** Then, fourthly, under "Certification", whereas
 18 previously it mentioned "Irrespective of the
 19 number of fraud prosecutions", that's just been
 20 changed to:
 21 "PACE certificates may be required for each
 22 individual criminal prosecution ..."
 23 **A.** Indeed.
 24 **Q.** So it looks like the fraud, benefit fraud, has
 25 been stripped out?

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1 **A.** Yes.
 2 **Q.** The distribution list is broadly the same,
 3 albeit Dave Campbell at ICL Outsourcing has been
 4 changed to Les Fereday at ICL Outsourcing --
 5 **A.** Yes.
 6 **Q.** -- and I think Patrick Cattermole is added to
 7 the list. You'll see, top right, that it's
 8 dated 9 December 1998.
 9 **A.** Yes.
 10 **Q.** The first one was, remember, 4 August 1998, so
 11 we're four/five months on. Are any of those
 12 people on that list, the distribution list
 13 there, Post Office people, to your knowledge?
 14 **A.** Not that I'm aware of.
 15 **Q.** Again, we can see that it goes to the library.
 16 Now, can we look at two documents side by
 17 side, the relevant parts of them, please. On
 18 the left-hand side of the page can we have
 19 FUJ00152140 at page 4 and on the right-hand side
 20 of the page can we have the document we are on,
 21 FUJ00152142, also at page 4. Thank you.
 22 So left-hand side of the page, August;
 23 right-hand side of the page, December.
 24 Can you see in relation to the three points
 25 that I picked up earlier suggesting that the

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1 **A.** Yes, it does.
 2 **Q.** There's a couple of flies in the ointment to the
 3 suggestion that I'm making, that there's been
 4 a stripping out of the coverage of the policy,
 5 to remove the limitation on benefit fraud
 6 prosecutions. If we go over on the right-hand
 7 side of the page, one page to page 5, if you
 8 look at the bottom under paragraph 5:
 9 "In order to demonstrate the integrity of
 10 a Horizon PACE certificate for the Benefit
 11 Payment Service, it is necessary to describe the
 12 information", et cetera, et cetera?
 13 So that again seems to be focused on benefit
 14 payments, doesn't it?
 15 **A.** Yes.
 16 **Q.** Then if you go over the page on the right-hand
 17 side again, there's a diagram -- and these
 18 appeared in the earlier iteration in exactly the
 19 same way. You'll see there's a diagram of
 20 information flow, and can you see that it starts
 21 with CAPS, which was a Benefits Agency payment
 22 system.
 23 **A.** Yes, I can see that.
 24 **Q.** So not completely clear because there are two
 25 residual mentions of Benefits Agency payments,

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1 therefore suggesting that the policy might be
2 focused on fraud prosecutions, agreed?

3 **A.** Yes.

4 **Q.** Overall, would you agree that this tends to
5 suggest that this later iteration of the policy
6 was broader in its coverage?

7 **A.** It would seem it was heading that way, even if
8 there were flies in the ointment. But this was
9 still a draft, wasn't it?

10 **Q.** It was still a draft. Can we see what the
11 substance of the policy says, and I'm going to
12 use the later version, the one on the right-hand
13 side to do this, so we can lose the one on the
14 left, please.

15 Thank you. Then if we can blow up
16 underneath the diagram. The policy says:

17 "Given the size and complexity of the
18 Horizon system, it is conceivable that the
19 integrity of the PACE certificate will be
20 challenged by Counsel in order to discredit
21 a prosecution. If it is not possible to
22 demonstrate the certificate's integrity to the
23 Court's satisfaction, a very dangerous precedent
24 will have been set and all subsequent
25 prosecutions will be automatically jeopardised.

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1 ICL Pathway can produce evidence to support
2 these statements.

3 "Traditionally, PACE certificates are signed
4 by a senior member of the Computer Operations
5 staff responsible for managing the computer
6 installation and its associated networks. ICL
7 Outsourcing performs this role as a managed
8 service for ICL Pathway, and it is assumed that
9 the information required for their assurance is
10 available to them in day-to-day operational
11 documentation and as management information ..."

12 Then there's a note to Les Fereday to
13 provide more appropriate wording:

14 "The certificate (see example at appendix A)
15 contains a declaration including the statement
16 'I sign this certificate knowing that I shall be
17 liable for prosecution if I have stated in it
18 anything which I know to be false or do not
19 believe to be true', it is therefore in his
20 rational self-interest to ensure (a) that the
21 logs are adequately comprehensive and (b) that
22 they are investigated thoroughly."

23 Just pause a moment, there's some movement
24 going on to my right. I just need to check out
25 what's going on.

91

1 However, the corollary is also true and
2 a successful demonstration of honest
3 certification will stand all subsequent
4 prosecutions in good stead."

5 It continues, in the light of those
6 warnings, to say:

7 "Comprehensive records pertaining to the
8 site(s), services and individuals concerned
9 should be able to produced at all ... times.
10 These records will serve to show that the
11 relevant services were available at all material
12 times, were operating properly and had not been
13 used inappropriately."

14 So looking at those two paragraphs together,
15 would you agree that this was suggesting that
16 the person who signs the certificate must be
17 able to produce evidence to support what they
18 were certifying?

19 **A.** Yes.

20 **Q.** It was said that it was -- forgive me a moment.

21 If we go further up to page 4, please.

22 Sorry, to page 5. The policy says in the first
23 paragraph:

24 "It is therefore vitally important that
25 whoever signs the PACE declaration on behalf of

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1 So, it says that it is vitally important
2 that the person who signs the certificate must
3 be able to produce evidence to support what
4 they're certifying, yes?

5 **A.** Yes.

6 **Q.** You can't just sign a certificate. You've got
7 to be able, if you're challenged, to produce
8 secondary evidence to support what you're
9 saying, is what this policy is suggesting?

10 **A.** It is.

11 **Q.** Then it says:

12 "Traditionally PACE certificates are signed
13 by a senior member of the Computer Operations
14 staff", with a capital "C" and capital "O".

15 Who were Computer Operations?

16 **A.** I couldn't tell you.

17 **Q.** Have you any idea?

18 **A.** Possibly the service function, because it
19 relates to managing the computer installation
20 and its associated networks. So --

21 **Q.** We know in due course that people from the third
22 tier of support, the SSC, provided some witness
23 statements and some analysts in the security
24 department provided witness statements. Are
25 either of those within the description of

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1 Computer Operations staff?
 2 **A.** Potentially. I'm trying to -- it's really where
 3 the functions sat or they sat across, so it's --
 4 so statements that were signed by -- you saw
 5 Graham Hooper and we've seen Jan Holmes, would
 6 have sat across a -- not a definition but
 7 a title of Computer Operations, I guess, within
 8 the Computer Operations.
 9 **Q.** It continues in the last paragraph there, having
 10 set out what the declaration on the witness
 11 statement says, that it is:
 12 "... in his [I think that's going to be the
 13 author of the statement] rational self-interest
 14 to ensure that (a) logs are adequately
 15 comprehensive and (b) that they are investigated
 16 thoroughly."
 17 Would you agree that that is common sense --
 18 **A.** Yes.
 19 **Q.** -- and that it contemplates the production of
 20 logs?
 21 **A.** It would suggest that logs are available.
 22 **Q.** Yes, and logs that have been investigated
 23 thoroughly --
 24 **A.** Yes.
 25 **Q.** -- not just produced. They've been investigated
 93

1 never required, but it may have appeared in some
 2 other form, in terms of the production of
 3 witness statements.
 4 **Q.** Can we go on, please, to page 6, and scroll
 5 down, please, to where we left off:
 6 "This secondary evidence should include, but
 7 is not restricted to, the following ..."
 8 Then there's a series of bullet points. So
 9 this is saying that behind the certificate
 10 should be kept some comprehensive records, which
 11 is described as secondary evidence, and they
 12 should include an external auditor's certificate
 13 of data integrity.
 14 Were you ever aware of external auditors
 15 providing certificates of the integrity of
 16 Horizon data?
 17 **A.** I can't say one way or the other. If they were,
 18 it may well have been arranged at a -- at this
 19 operational level in the production of the
 20 statements. But I can't specifically recall an
 21 external auditor. That doesn't mean to say it
 22 didn't happen.
 23 **Q.** But you'll see, certainly at this time, the
 24 policy that was being proposed, when Section 69
 25 and 70 of PACE were in force, was that there
 95

1 thoroughly before they are produced?
 2 **A.** Into signing the certificate, yes.
 3 **Q.** Would you agree that this document is a document
 4 that ought to be shown to or explained to anyone
 5 who produced a witness statement for Fujitsu in
 6 a criminal prosecution or civil proceedings?
 7 **A.** To the extent that this -- that PACE
 8 certificates were required, yes.
 9 **Q.** Would you agree that its terms should have been
 10 complied with?
 11 **A.** If it became a version 1.0 published document,
 12 yes.
 13 **Q.** We're going to see that that never happened,
 14 that it never became a 1.0. Do you know why it
 15 wouldn't happen? What would stand in the way?
 16 **A.** Well, wasn't the Martyn Bennett letter referring
 17 to the fact that PACE certificates weren't
 18 required?
 19 **Q.** So do you know that that is the reason why --
 20 **A.** I don't --
 21 **Q.** -- it never became a 1.0?
 22 **A.** I can't specifically say that but I can
 23 assume -- well, I can come to that conclusion
 24 that because PACE certificates were not
 25 required, this particular policy never -- was
 94

1 should be an external auditor's certificate of
 2 data integrity?
 3 **A.** Yes.
 4 **Q.** Can you recall any discussion that followed the
 5 repeal of Section 69 of PACE about the
 6 continuing necessity for an external auditor's
 7 certificate of data integrity?
 8 **A.** It wasn't dealt with at a commercial level, as
 9 a commercial matter.
 10 **Q.** If there was a cost involved in that, that's
 11 something that would have bubbled up to your
 12 level, wouldn't it?
 13 **A.** Yes, I'm getting to that point, that I can't
 14 recall whether we actually paid -- I mean the
 15 level of detail, you know, number of suppliers
 16 that we -- payments that we would have made over
 17 the years, over the time, I can't specifically
 18 recall a -- whether we did or whether we didn't.
 19 **Q.** Secondly:
 20 "Logs of calls to the Horizon System
 21 Helpdesk and the Payment Card Helpline detailing
 22 incidents of error, inaccuracy or value function
 23 pertaining to the sites, equipment, services and
 24 individuals concerned ..."
 25 I'm going to skip over the next couple and
 96

1 go over the page, please, and the last bullet
 2 point. The secondary evidence should include:
 3 "Testimony from expert witnesses stating
 4 that, in their experience, similar incidents
 5 have never happened or, if they had, they would
 6 be reflected in the relevant audit log."
 7 Can you recall when you joined, whether that
 8 was something that occurred, namely ICL, when it
 9 produced any certificates or witness statements
 10 supporting a criminal prosecution, would also
 11 seek, as part of the secondary evidence,
 12 testimony from expert witnesses stating in their
 13 experience similar incidents had never happened
 14 or, if they had, they'd be reflected in the
 15 relevant audit log?
 16 **A.** No, I can't.
 17 **Q.** Can we move on, please, and look at FUJ00152171.
 18 So this is the third in the trilogy of documents
 19 that I wanted to show you. You'll see that this
 20 is dated 30 January 2001. It's a version 0.1
 21 and therefore a draft. If we see that the title
 22 has changed to "Production of System Information
 23 for Evidential Purposes", the abstract is:
 24 "Requirements and procedure for the
 25 production of evidential information to support
 97

1 et cetera.
 2 You'll remember that from the last document
 3 we looked at.
 4 **A.** Yes.
 5 **Q.** "The certificate (see example at Appendix A)
 6 ..."
 7 We'll come back to that because, in fact,
 8 Appendix A does not include a sample
 9 declaration. Then it sets out the sample
 10 declaration and then, if we go over the page,
 11 please, 4.2:
 12 "The manager of the ICL Pathway Fraud Risk
 13 Management team, or his deputy, will advise
 14 a nominated member of ICL Outsourcing of the
 15 relevant dates and times for which a PACE
 16 certificate is required."
 17 So it is mentioning PACE in these parts:
 18 "The ... nominee will consult operational
 19 records pertaining to computer and network
 20 operations on the dates and times advised, in
 21 order to satisfy himself that a certificate can
 22 be signed with confidence. A statement should
 23 accompany the certificate to the effect that
 24 additional (supporting) evidence to uphold the
 25 certificate can be produced ... To offer all the
 99

1 potential prosecutions and procedure for the
 2 creation of Witness Statements."
 3 It seems to have been written by Graham
 4 Hooper. Distribution: ICL Pathway Library,
 5 Graham Hooper, Chris Billings. So this is
 6 January 2001, just before you joined, a slightly
 7 different title and abstract to what we saw
 8 earlier, and this is a procedure document,
 9 whereas the last ones were described as process
 10 documents.
 11 Can we go, please, to page 4. We can see in
 12 paragraph 1 that the mentions of PACE have been
 13 stripped out.
 14 **A.** Yes.
 15 **Q.** Would you agree that this tends to suggest that
 16 this policy document is applicable to all
 17 criminal prosecutions in which ICL are involved?
 18 **A.** Yes.
 19 **Q.** Looking at "Scope", again, mention here of PACE
 20 and, indeed, of benefit fraud prosecutions not
 21 included. Then under 4.0 "Certification", this
 22 draft policy reads:
 23 "Traditionally PACE certificates are signed
 24 by a senior member of the Computer Operations
 25 staff responsible for managing", et cetera,
 98

1 evidence without it being requested would only
 2 serve to flood the courtroom with
 3 documentation."
 4 Then "Supporting Evidence" gets its own
 5 heading under 5.0. There's the passage about it
 6 being conceivable that the integrity of the PACE
 7 certificate will be challenged. Comprehensive
 8 records must be available to be produced, as
 9 before and they're set out, including the
 10 external auditor's certificate of data
 11 integrity. Then, over the page, we'll see
 12 exactly the same as before.
 13 **A.** Yes.
 14 **Q.** Now, you'll remember that it said that the PACE
 15 certificate was in Appendix A?
 16 **A.** Yes.
 17 **Q.** If we go over the page, please, we can see what
 18 Appendix A is and, in fact, it's not a PACE
 19 certificate at all; it's a witness statement --
 20 **A.** Yes.
 21 **Q.** -- a blank witness statement in terms of date
 22 and author.
 23 If we just scroll through very slowly, you
 24 can see it's like a template to be written by
 25 a security analyst, and it's describing the
 100

1 balancing process, and then later, the
2 extraction of documents.

3 Then, over the page, please, and then over
4 the page again. There's an interesting line at
5 the top of this third page:

6 "The integrity of audit data is guaranteed
7 at all times from its origination, storage and
8 retrieval to subsequent despatch to the
9 requester. Controls have been established that
10 provide assurances to Post Office Internal Audit
11 that this integrity is maintained."

12 So a draft witness statement, rather than
13 a certificate.

14 **A.** Certainly.

15 **Q.** So would you agree that post the repeal of
16 Section 69 of PACE, the draft policy appears to
17 have changed and, although there's some language
18 that refers to PACE certification, the draft
19 policy is suggesting that everything that has
20 been said before in the drafts obtains but now
21 we will produce a witness statement rather than
22 a PACE certificate?

23 **A.** It would appear so, yes.

24 **Q.** Do you know why this would not be carried into
25 effect, would not ever become version 1.0?

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1 **MR BEER:** Good afternoon, sir, can you see and hear
2 me?

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

4 **MR BEER:** Thank you. Mr Lenton-Smith, we were about
5 to turn to the Cleveleys case. I'm going to
6 attempt to deal with matters chronologically.
7 Can we start, please, with what happened on
8 20 August 2003 by looking at FUJ00121482.

9 We can see here, looking at the bottom part
10 of the email first, an email from Jan Holmes to
11 you of 20 August --

12 **A.** Yes.

13 **Q.** -- 2003. We can see the subject matter is
14 "Cleverleys", as he's described it, "Horizon
15 Equipment".

16 To your knowledge, to your memory, was this
17 your first involvement in the Cleveleys case.

18 **A.** I believe so. I mean, I haven't got any other
19 documentary evidence to suggest that.

20 **Q.** Nor have we.

21 **A.** No. Okay.

22 **Q.** What role did Jan Holmes perform at this time?

23 **A.** I believe he was the audit manager. I'm not
24 sure what his title is, I can --

25 **Q.** If we flip over the page we can see his

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1 **A.** You're telling me it didn't become?

2 **Q.** Correct.

3 **A.** I can't say, unless there was another document,
4 another document which dealt with production of
5 witness statements.

6 **Q.** We haven't been given one. You would agree,
7 wouldn't you, and I think you, in fact, did
8 earlier, that it would be important to have
9 a policy that carried the contractual
10 requirement or the without-prejudice agreement
11 into effect, that told people within Fujitsu how
12 it was going to be done?

13 **A.** Yes, I -- that's what I said.

14 **Q.** Can you think of a good reason why a policy like
15 this would not be carried into effect?

16 **A.** I can't think of a good reason.

17 **MR BEER:** Sir, we're about to turn to the Cleveleys
18 case. I wonder whether that would be a good
19 moment for lunch and perhaps come back at 1.45?

20 **SIR WYN WILLIAMS:** That's fine, Mr Beer. Yes.

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

22 **SIR WYN WILLIAMS:** 1.45.

23 (12.44 pm)

(The Short Adjournment)

24 (1.45 pm)

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1 signature block, describes himself as
2 a Programme Assurance Manager. What's one of
3 those?

4 **A.** Effectively to ensure kind of the overall
5 integrity of the programme.

6 **Q.** Back to the first page, please. What
7 relationship therefore, professional
8 relationship, did Jan Holmes have to you or with
9 you?

10 **A.** Okay, so he was a colleague not within the
11 commercial function, but matters that dealt
12 with -- that he came across that were of
13 a commercial nature or had been flagged up by
14 Post Office as of commercial nature, would come
15 to me and we would discuss these, the points, or
16 take them forward.

17 **Q.** Therefore, did you work quite closely with him
18 when the occasion --

19 **A.** Yes.

20 **Q.** -- arose?

21 **A.** Yes.

22 **Q.** Reading the email:

23 "Colin

24 "Nothing is as clear as it seems. I have
25 some papers faxed over from [Post Office] and

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1 this is my proposed reply. I've had it
2 'technically' checked by Mik."
3 Just stopping there, would you understand
4 that to be a reference to Mik Peach?

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

6 **Q.** "Are you happy with it? Jim is Jim Cruise with
7 [Post Office] Legal Services their in-house
8 sollies", ie solicitors.

9 **A.** Yes.

10 **Q.** Then he sets out a draft email. If we scroll
11 down, please:

12 "Jim,

13 "For clarification I am not part of
14 Fujitsu's legal department. My role in Post
15 Office Account is restricted to assisting Post
16 Office with litigation support as and when it is
17 required."

18 Does that accurately describe his role?

19 **A.** I think it's part of his role.

20 **Q.** And --

21 **A.** I think his role was wider than that but, within
22 his function, within his job, that's what he
23 did.

24 **Q.** So relevantly, it was his role?

25 **A.** Yes.

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1 Can we start, please, with POL00118218.
2 This is part of the trial bundle for the claim
3 between the Post Office and Julie Wolstenholme;
4 do you see that?

5 **A.** Yes.

6 **Q.** If we go, please, to page 10 and look at
7 paragraph 14. This is part of what's called the
8 Defence and Counterclaim, so it's
9 Mrs Wolstenholme's defence to the claim that the
10 Post Office brought against her for delivery up
11 of computer equipment. She says:
12 "... it was an implied term of the contract
13 between the [Post Office] and [Julie
14 Wolstenholme] that the computer system provided
15 by the [Post Office] would be fit for its
16 purpose and the [Post Office] is in breach of
17 this term in that the computer systems provided
18 was unfit for its purpose and the [Post Office]
19 failed to ensure that the system was working
20 adequately. [Julie Wolstenholme] has supplied
21 the [Post Office] with details of the persistent
22 inadequacies of the said computer system."

23 We'll see that the date of that document is
24 6 June 2001. So it seems from this that the
25 operation and adequacy of the Horizon System was

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1 **Q.** Relevantly to this --

2 **A.** Yes.

3 **Q.** -- issue?

4 **A.** Yes.

5 **Q.** "Thanks for the papers. I've done some
6 preliminary work and, perhaps inevitably, the
7 picture is not as clear as we might wish.

8 "Let me start with the easy stuff:

9 "1. We will have no record of any
10 transaction data from Cleveleys dated before
11 November 2000 in the central audit archive since
12 this is automatically deleted 18 months from the
13 date that it is written. So, if 30th November
14 was the last active day for the Counter ..."

15 Just stopping there, that was the last
16 active day for Julie Wolstenholme's employment
17 and operation of the counter:

18 "... that data would have been deleted on or
19 about 30th May 2002.

20 "2. Similarly, there will be no Helpdesk
21 logs since these are also deleted after
22 18 months."

23 Just pausing there, can I look at some
24 documents that predated this to work out what
25 had happened in this claim.

106

1 in issue in the proceedings from the beginning
2 of June 2001; can you see that?

3 **A.** I can see that, yes.

4 **Q.** If we go forwards to page 95, please, and look
5 at paragraph 4. This is the Post Office's
6 response to what was said in the document I've
7 just shown you and it says:

8 "It is denied that said computer system was
9 unfit for its purpose and it is averred that the
10 same worked adequately."

11 Then if we go forwards to page 99, please.
12 This is an order of the court of 21 August 2001.
13 If we just look at paragraph 3:

14 "Each party do give standard disclosure to
15 the other by serving copies with a disclosure
16 statement by ... 21 October 2001."

17 Now, you wouldn't have seen any of these
18 documents at the time; is that right?

19 **A.** In 2001?

20 **Q.** Correct.

21 **A.** No, I haven't seen these documents, no.

22 **Q.** You would agree, I think, looking at them now,
23 that the operation and adequacy of the Horizon
24 System appears to have been an issue between the
25 Post Office, on the one hand, and

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1 Mrs Wolstenholme, on the other?
 2 **A.** That's what she claims, yes.
 3 **Q.** Well, that's what the document --
 4 **A.** Says, yes.
 5 **Q.** Yes. She claimed it, the Post Office denied it.
 6 **A.** Yes.
 7 **Q.** At that time, mid-2001, if Horizon data was kept
 8 for 18 months, that would include all of the
 9 relevant data from Horizon relating to the
 10 Cleveleys branch in the period February to
 11 November 2000, wouldn't it?
 12 **A.** It would have not been deleted in --
 13 **Q.** It would have not been deleted?
 14 **A.** -- in the 18 months, yes.
 15 **Q.** In that 18 months. The relevant period in the
 16 claim, I should have said, is between February
 17 2000 and November 2000.
 18 **A.** Yes.
 19 **Q.** In the light of those documents, would you
 20 expect the Post Office to approach Fujitsu to
 21 seek such data?
 22 **A.** In any other instance, one would have expected
 23 that to happen, yes.
 24 **Q.** Ie "The period is February to November 2000, we
 25 know there's an 18-month deletion policy, we had
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1 conversation wouldn't go anywhere.
 2 **Q.** Would there have been no point in such
 3 a conversation?
 4 **A.** There might have been a point of the
 5 conversation but, by that time -- by 2003, when
 6 I was involved and subsequently when Keith
 7 Baines wrote to me, it was a *fait accompli*. The
 8 data had gone. So they were looking for other
 9 ways to try to validate the Horizon System or
 10 refute the allegations from -- that were being
 11 made against it.
 12 **Q.** Thank you. That document can come down and we
 13 can go back to FUJ00121482. This is the email.
 14 Scroll down, please. So we dealt with
 15 paragraph 1 about the deletion. Paragraph 2:
 16 "Similarly, there will be no Helpdesk logs
 17 since these are also deleted after 18 months."
 18 Do you know whether that's true or false?
 19 **A.** I don't know.
 20 **Q.** Did you see in the claim Helpdesk logs produced,
 21 in order for Mr Coyne to opine on their
 22 contents?
 23 **A.** I can't remember, I'd have to go -- I'd have to
 24 look at their respective -- his report and our
 25 commentary on his report.
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1 better ask Fujitsu to not delete or destroy the
 2 data"?)
 3 **A.** Yes.
 4 **Q.** Did you ever come to know why the Post Office
 5 did not ask that of Fujitsu?
 6 **A.** No, I don't know why they didn't. I think in
 7 some of the documentation Jan Holmes' part of
 8 the issue was that it took such a long time to
 9 get Fujitsu engaged in providing information,
 10 that by that time it was too late.
 11 **Q.** As we've said, the first involvement that we can
 12 trace certainly for you, was the email of
 13 20 August 2003?
 14 **A.** Which was after the date.
 15 **Q.** Which was too late?
 16 **A.** Too late.
 17 **Q.** But you later, I think, came to learn of the
 18 failure of the Post Office to ask Fujitsu to not
 19 delete or destroy of the data. Was there any
 20 conversation between Fujitsu and the Post Office
 21 about how this had come to pass? How this state
 22 of affairs had occurred?
 23 **A.** No, by which time, I think it was almost
 24 a pointless conversation because they knew it
 25 had been deleted and, therefore, the
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1 **Q.** Okay, well, we'll get to that in the chronology
 2 but keep that in mind. Mr Holmes says that
 3 records of transactions cannot be retrieved if
 4 a counter has been switched off for 35 days.
 5 Did you know whether that was accurate or not?
 6 **A.** I believed it was around a month, that the
 7 transactions would sit on the counter for
 8 a month.
 9 **Q.** Paragraph 4, Mr Holmes says:
 10 "Under no circumstances would we allow a 3rd
 11 party direct access to a counter. The file
 12 store is encrypted and for a 3rd party to make
 13 sense of the data we would have to release to
 14 them details of the encryption key. This we
 15 would not do."
 16 So the third party access, who did you
 17 understand that to refer to?
 18 **A.** I'm not sure because I haven't got the faxed
 19 questions that had come in from Post Office as
 20 to what this is answering. So I'm not sure who
 21 he's referring to in terms of a third party. At
 22 that point it wasn't an expert, I don't think.
 23 **Q.** If we go further down, on the page, please:
 24 "How we can help:
 25 "1. If this is to be pursued then the work
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1 would have to be undertaken by our technical
2 specialists in Bracknell, possibly with the 3rd
3 party in attendance as an observer. Said 3rd
4 party would require to be security cleared
5 before being allowed access?"

6 Again, does that help you to understand what
7 was being sought here, who the third party might
8 be?

9 **A.** I'm not sure who the third party would be.

10 **Q.** Again, if we can pause this for the moment and
11 jump ahead a little and look at something that
12 was written later about this stage in the
13 episode, can we look at FUJ00121485. This is
14 just to date the document that we're about to
15 look at. It's six or seven months later. It's
16 an email from Jan Holmes to you and he says
17 that:

18 "Colin,

19 "[It's an] Early view of where I am with
20 a reply to Keith's letter."

21 We're going to come back to that when we get
22 to it but, in the course of this, he says
23 something about "this early stage". If we can
24 go back to FUJ00121486, thank you. This is the
25 attachment to the email, so we can treat this as

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1 "On 20 August a fax was received from [Post
2 Office] explaining the situation and requesting
3 a Witness Statement to the effect that there was
4 nothing on the equipment that would assist the
5 [postmaster] in her claim and that it should be
6 returned.

7 "The following day I replied, by email,
8 stating that I was loath to produce a Witness
9 Statement at this stage but explaining what
10 information existed on the equipment, what would
11 happen if it was switched on and that we would
12 not allow 3rd parties access. I also explained
13 how we could help POL. I received no reply to
14 this email."

15 Again, from that, does it appear that not
16 only was your first involvement in August 2003
17 but Mr Holmes' first involvement was 2003.

18 **A.** Yes, in response to the fax.

19 **Q.** Does that again accord with your recollection
20 that the first involvement of Fujitsu was only
21 in August 2003?

22 **A.** Yes.

23 **Q.** That highlighted paragraph there, the last one,
24 that "The following day I replied with
25 an email", that looks like the email that we've

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1 being February 2004 --

2 **A.** Yes.

3 **Q.** -- 18 February 2004. It's the "Background"
4 section. Mr Holmes says:

5 "POL have been in dispute with [postmaster]
6 of this Outlet since mid-2000. Essentially,
7 [Post Office] have made a claim against the
8 [postmaster] for losses at the Outlet, against
9 which she had counter-claimed that the problem
10 was caused by the Horizon System and she was
11 refusing to release the equipment as she
12 believed an examination of it would vindicate
13 her. A court order was made on 19 February 2003
14 that a computer expert examine the equipment.

15 "POA's first involvement ..."

16 I think that essentially means Fujitsu's.

17 **A.** Post Office Account, yes.

18 **Q.** "[Fujitsu's] first involvement was a request
19 made 8 August 2003 by [Post Office] that we
20 provide a Witness Statement 'about the Horizon
21 equipment and what it contains (or doesn't) and
22 give [Mrs Wolstenholme] a chance to object'.
23 [Post Office] wanted the Court to overturn the
24 Court Order so that [the Post Office] could
25 recover the equipment.

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1 just looked at, doesn't it? The one saying,
2 "The following day I replied", that looks like
3 the draft we just looked at, doesn't it?

4 **A.** Can we look at the email again?

5 **Q.** Sure. You will see that he doesn't say that
6 he's loath to produce a witness statement.
7 FUJ00121482. Yes, thank you. Scroll down
8 please, at the draft.

9 **A.** On the next page, does it go on?

10 **Q.** Yes, thank you.

11 **A.** No. Back again, sorry. So "How we can help".

12 **Q.** Sorry?

13 **A.** I was just looking at "How we can help".

14 I can't see a reference to the fact that we're
15 not going to produce a witness statement.

16 **Q.** No. Do you know why Mr Holmes would have been
17 loath to produce a witness statement?

18 **A.** At this stage, he says. No idea.

19 **Q.** We saw from the document we just looked at that
20 Mr Holmes added "After I sent this reply, there
21 was no reply from the Post Office".

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

23 **Q.** Does that accord with your recollection, that
24 the Post Office didn't reply?

25 **A.** I-- well, I don't know that because he sent it

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1 to -- who did he send this to in Post Office?
 2 **Q.** We can look at the actual email sent,
 3 WITN04600202.
 4 **A.** To Jim Cruise. So I wasn't copied on it, so
 5 I don't -- I'm not aware --
 6 **Q.** You wouldn't know whether --
 7 **A.** I wouldn't know he got a copy -- whether he got
 8 a response or not.
 9 **Q.** That's the final email sent, and it's the -- the
 10 addition is second paragraph, second sentence:
 11 "Under the circumstances it might be best to
 12 fully understand the position before I commit to
 13 writing a Witness Statement that you may later
 14 [rely on] in Court."
 15 **A.** Yes, okay, so that's kind of a toned down
 16 version of his internal statement, "I'm loath to
 17 produce a statement".
 18 **Q.** So this is the email that was, in fact, sent to
 19 Jim Cruise, the lawyer at the Post Office on
 20 21 August 2003. Let's assume that there was no
 21 reply. The next stage in the process is in
 22 2004, in February. Can we move to POL00095375.
 23 I think this is a letter you've referred to
 24 already. It's a letter to you from Keith
 25 Baines.

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1 her fault and she wants the computer equipment
 2 to be examined by an expert witness before she
 3 will agree to its release to Fujitsu Services
 4 from her premises.
 5 "The County Court instructed the parties
 6 jointly to commission a report from an expert
 7 approved by the court. I enclose a copy of his
 8 report. As you will see, the expert's opinion
 9 is that the Horizon System installed at
 10 Cleveleys branch was defective and that the HSH
 11 was more concerned with closing calls than
 12 preventing recurrence of faults. As I'm sure
 13 you will understand, Post Office is concerned by
 14 these findings, not only in relation to this
 15 particular case, but also because of any
 16 precedent that this may set and that may be used
 17 by Post Office's agents to support claims that
 18 the Horizon System is causing errors in their
 19 branch accounts.
 20 "Please can you advise me of Fujitsu
 21 Services' view of the main points in the report
 22 and, if you do not agree with them, please can
 23 you suggest what information or advice Fujitsu
 24 Services can provide to the expert that might
 25 lead him to change his findings.

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1 **A.** That's right.
 2 **Q.** If we look at the second page, please. We can
 3 see it's from Keith Baines, Contract Manager.
 4 Back to the first page, 5 February 2004:
 5 "Dear Colin
 6 "You may be aware of the above case which
 7 relates (among other matters) to the recovery by
 8 Post Office Limited of some Horizon equipment
 9 belonging to Fujitsu Services which a former
 10 subpostmistress at Cleveleys post office branch
 11 (Mrs Wolstenholme) has refused to return. There
 12 has been previous correspondence with Jan Holmes
 13 of Fujitsu ... relating to this case."
 14 That's presumably a reference to the August
 15 2003 exchange of emails?
 16 **A.** Yes.
 17 **Q.** "Mrs Wolstenholme has counterclaimed against the
 18 Post Office, and the essence of her claim is
 19 that deficiencies in the Horizon System and in
 20 the service provided by the HSH resulted in her
 21 incurring costs and losing income because of the
 22 waste of her time. She is claiming that the
 23 Horizon System itself has caused losses in the
 24 sub post office accounts which [Post Office
 25 Limited] is claiming against her as being due to

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1 "An early response would be appreciated."
 2 When you got this, presumably you realised
 3 that there'd had been no correspondence between
 4 August 2003 and now, February 2004?
 5 **A.** Correct.
 6 **Q.** This was a potentially commercially sensitive
 7 matter for both the Post Office and Fujitsu,
 8 wasn't it?
 9 **A.** Yes.
 10 **Q.** Were you aware at this time that any other post
 11 offices or subpostmasters were claiming that the
 12 Horizon System was causing errors in their
 13 branch accounts?
 14 **A.** I can't specifically say whether there were at
 15 the time. All I know -- all I can state is what
 16 I've put in my witness statement, is that
 17 I think, at a commercial level, there were very
 18 few that were raised between Keith Baines and
 19 myself where he required commercial --
 20 additional commercial discussions that -- beyond
 21 what was happening at the operational level, in
 22 terms of witness support. Very few over the
 23 seven years.
 24 **Q.** You put it, I think, at less than five?
 25 **A.** Less than five, yes. I mean, over the time

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1 I was with -- on Post Office Account.
 2 **Q.** For that six and a half year period?
 3 **A.** Yeah.
 4 **Q.** Were you aware, by this time, February 2004,
 5 that there had been Acceptance Incidents
 6 relating to accounting integrity and
 7 discrepancies that had emerged during
 8 development into rollout and had persisted even
 9 after rollout?
 10 **A.** No.
 11 **Q.** Were you aware at this time of the work that
 12 something called the EPOSS Taskforce had carried
 13 out during the development of Horizon and
 14 subsequent management decisions taken as to the
 15 ongoing Electronic Point of Sale, the EPOS
 16 System problem?
 17 **A.** No.
 18 **Q.** When you became responsible for managing the
 19 contract, from March 2001, would you not look
 20 back at what had occurred to lead you and Post
 21 Office to that point, in terms of contractual
 22 amendments, changes that had been made to the
 23 contract because of, for example, Acceptance
 24 Incidents?
 25 **A.** There's two things, I think, to say -- is that

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1 **Q.** So to summarise, your position is that, because
 2 it had been through acceptance, the system must
 3 be working sufficiently well --
 4 **A.** Yes.
 5 **Q.** -- save that it was a large and complex system
 6 and therefore there would inevitably be
 7 glitches?
 8 **A.** Yes.
 9 **Q.** Nothing greater than that?
 10 **A.** No.
 11 **Q.** Had you been, by February 2004, informed of
 12 something called the Callendar Square bug?
 13 **A.** No.
 14 **Q.** Had you ever heard of that?
 15 **A.** Never heard of it.
 16 **Q.** Had you, by 2004, been told about something
 17 called the lock bug --
 18 **A.** No.
 19 **Q.** -- or the outstanding lock on the run?
 20 **A.** No.
 21 **Q.** Had you, by 2004, been told about the data tree
 22 build failure bug?
 23 **A.** No.
 24 **Q.** Had you been told about the Girobank
 25 discrepancies bug?

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1 I think the position I was in mirrored what
 2 Keith Baines had reflected in his witness
 3 statement, was to say that the system had gone
 4 through acceptance. It had been accepted by
 5 Post Office, gone through acceptance tests by
 6 Post Office. It was found to be working and it
 7 was rolled out, and that was kind of the
 8 position overall. It was understood that within
 9 an IT system at this stage of this size that
 10 issues would arise, they'd have can be
 11 corrected. It's in the nature of software that
 12 it was going to have issues that would be
 13 corrected. But it was the -- then the degree of
 14 impact that that would have.

15 But, certainly, the position from
 16 a commercial perspective, it may be that was
 17 what we felt at the time, and mirrored exactly
 18 what I felt and what Keith felt, that, actually,
 19 the system was working. It was not an issue.
 20 There were no issues that significantly
 21 issued -- or significantly caused problems, and
 22 that was the stance. That was where -- how we
 23 were supporting Post Office, in terms of
 24 providing data to them to substantiate any
 25 issues.

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1 **A.** No.
 2 **Q.** Had you been told about the counter replacement
 3 bug?
 4 **A.** No.
 5 **Q.** These are all bugs that the High Court was
 6 subsequently to find existed and predated, in
 7 part, 2004?
 8 **A.** Right.
 9 **Q.** You hadn't been told about any of those?
 10 **A.** No.
 11 **Q.** Would you expect to be told about those: bugs,
 12 fundamental bugs in the Horizon System that
 13 either were capable of or did cause
 14 discrepancies in postmaster accounts?
 15 **A.** I think if it had become an issue of concern
 16 between Post Office and Fujitsu, that this would
 17 have been raised at a number of forum. But I'm
 18 not aware that that happened.
 19 **Q.** That can come down off the screen. Thank you.
 20 Taking a step back, at this point, the
 21 position was as follows, wasn't it: the court
 22 had said there should be a jointly instructed
 23 expert?
 24 **A.** Mm-hm.
 25 **Q.** An expert had been jointly instructed by the

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1 Post Office and Mrs Wolstenholme --
 2 **A.** Yes.
 3 **Q.** -- and he had produced a report that suggested
 4 that the discrepancies about which
 5 Mrs Wolstenholme complained may well be as
 6 a result of defects in Horizon?
 7 **A.** I believe that's what it says. I can't
 8 remember. It was only recently I got his
 9 report.
 10 **Q.** I'm sorry, it was only recently?
 11 **A.** It was in the bundle, his report --
 12 **Q.** Yes, but of course you got it back in 2004,
 13 didn't you?
 14 **A.** I got it in 2004 but I couldn't precisely
 15 remember what he said, other than how we
 16 responded to it.
 17 **Q.** Were you aware at this time that the Post Office
 18 was prosecuting subpostmasters?
 19 **A.** I was aware of one or -- of these instances that
 20 there was anything -- there was a great number
 21 of them.
 22 **Q.** I think the figures are between 2000 and 2015.
 23 **A.** Right.
 24 **Q.** So the entire period some 844, resulting in some
 25 705 convictions?

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1 is concerned by these findings, not only in
 2 relation to this particular case, but also
 3 because of any precedent that this may set and
 4 that may be used by Post Office's agents to
 5 support claims that the Horizon System is
 6 causing errors in their branch accounts."
 7 Did you gain any sense at this time that the
 8 Post Office was seeking to cover up any defects
 9 in Horizon --
 10 **A.** No.
 11 **Q.** -- because admitting the contrary might be
 12 rather difficult, in the round?
 13 **A.** No.
 14 **Q.** That if the system was found to not be reliable,
 15 then it couldn't be used to trade and that might
 16 lead to significant financial impacts on the
 17 Post Office as a whole?
 18 **A.** No.
 19 **Q.** Was it ever expressed to you that Horizon and
 20 the continued operation of Horizon was essential
 21 to the maintenance of a substantial number of
 22 Post Office branches, in particular rural
 23 branches?
 24 **A.** Well, it was always -- clearly, it was always
 25 the objective that there was a working system

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1 **A.** Yes. So I was not aware of the depth and
 2 intensity of their activity. As I said, the
 3 only ones that came up to me through Keith,
 4 through the commercial function, were a minimal
 5 number.
 6 **Q.** Why did some come up to you?
 7 **A.** It's difficult to remember. I can't remember
 8 the specific -- I know there were a few, as
 9 mentioned. Why there was -- why they were
 10 there, I can't remember. I'm trying to remember
 11 but I can't remember.
 12 **Q.** Why might they come up to you as the contract
 13 manager?
 14 **A.** Because there was either an obligation or
 15 perhaps something that we were not fulfilling or
 16 they wanted to ask for additional assistance
 17 that was beyond the scope or maybe witness
 18 statements, which were beyond -- perhaps were
 19 getting more frequent, or perhaps the number of
 20 data extractions were beyond the limits that
 21 they had -- we had agreed.
 22 **Q.** If we go back to the letter from Mr Baines to
 23 you, POL00095375. Look at the last paragraph on
 24 the first page and the last sentence:
 25 "As I'm sure you'll understand, Post Office

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1 that would support communities.
 2 **Q.** I'm looking at it the other way around: that it
 3 was said that the existence and continuing
 4 operation of Horizon was essential to the
 5 maintenance of the full Post Office estate. If
 6 there were problems with the integrity of it,
 7 that represented --
 8 **A.** It was never --
 9 **Q.** -- an existential threat.
 10 **A.** It was never put forward like that.
 11 **Q.** So here they're raising, in this last paragraph,
 12 if we just go back, please, the Post Office,
 13 a twofold concern: (1) the impact on the case
 14 and, secondly, the use by others of the report
 15 to say that Horizon is causing errors, yes?
 16 **A.** Yes.
 17 **Q.** They are the two things that are pointed out?
 18 **A.** Yes.
 19 **Q.** The one thing that isn't said in the letter is
 20 the Post Office is concerned by this report
 21 because it might be right?
 22 **A.** No, because I think, even going back to Keith
 23 Baines' Witness Statement, it didn't occur that
 24 it wasn't. It was -- the statement was that it
 25 was working and, therefore, it could not have

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1 been anything to do with Horizon.
 2 **Q.** So the one thing that we don't see in this
 3 letter is "The Post Office is concerned because
 4 an independent expert commissioned jointly by us
 5 has pointed out defects in the Horizon System.
 6 He might be right and we're operating a computer
 7 system that may be faulty". You're saying that
 8 that wouldn't have occurred to the Post Office
 9 in your view, because of an unshakable belief in
 10 the system?
 11 **A.** Well, there was that but also, I think, they
 12 wanted us to respond to the expert's report to
 13 try to balance what we thought -- what both of
 14 us thought were inaccuracies or perhaps issues
 15 with the report. And, therefore, as it stood,
 16 it was not something that needed -- they wanted
 17 to cause a precedent.
 18 **Q.** But they don't say in this letter there's
 19 anything inaccurate in the report, do they?
 20 **A.** They say -- well, he says that the expert -- no,
 21 he's talking about the expert's opinion that
 22 there is an issue with the system and the HSH.
 23 So he's asking us to respond to those comments.
 24 **Q.** But he's not asking you to respond in a neutral
 25 way, is he?

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1 you can see between us and the Post Office,
 2 regarding the report, was trying to create what
 3 we thought was a more balanced position on it,
 4 rather than letting the expert's opinion stand
 5 as it stood, which we felt didn't -- hadn't gone
 6 into enough detail around the system to give it
 7 full credibility.
 8 **Q.** Can we move forwards, please, and look at
 9 FUJ00121486. This is the report that Jan Holmes
 10 sent to you on 18 February 2004. Remember,
 11 I showed you the email before.
 12 **A.** Yeah.
 13 **Q.** If we pick up where we left off, we left off
 14 above "The Expert's Opinion", at the foot of the
 15 page. So this is Jan Holmes's response or
 16 commentary upon Mr Coyne's report.
 17 **A.** Yes.
 18 **Q.** Did you ask Mr Holmes to look at this?
 19 **A.** Yes, so in response to Keith's Baines' letter,
 20 we would have then discussed this.
 21 **Q.** Can you recall what your instructions were to
 22 Mr Holmes?
 23 **A.** To take -- to review the expert's report.
 24 **Q.** Were they loaded in any way or were they simply
 25 to look into it and report back?

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1 **A.** Neutral?
 2 **Q.** "Please tell us whether the expert is right or
 3 not"?
 4 **A.** No, he's not asking that. Just "Please
 5 comment".
 6 **Q.** Would you agree that the way this is written is
 7 rather myopic -- narrow in perspective?
 8 **A.** It feels as though it is one of concern. You
 9 know, "surely not".
 10 **Q.** Was that an attitude that was prevalent in your
 11 dealings with the Post Office?
 12 **A.** In the reliance on the system?
 13 **Q.** Yes.
 14 **A.** Yes. Well, from a commercial perspective, from
 15 the commercial function, yes.
 16 **Q.** Did you ever get the sense that the Post Office
 17 thought that it must defend the system at all
 18 costs because, if it didn't, then the viability
 19 of the Post Office Counters business was at
 20 risk?
 21 **A.** I think they were looking for assurance that the
 22 system was correct.
 23 **Q.** Not independence and neutrality as to whether
 24 the system contained errors?
 25 **A.** I think there was a -- I think the dialogue that

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1 **A.** No, I don't -- I wouldn't say that we were
 2 loaded. I wouldn't want to do that. So I think
 3 we would say that we were trying to produce
 4 a balanced response.
 5 **Q.** Let's look at what Mr Holmes's opinion or
 6 comments on the opinion were. He says:
 7 "Taking each opinion as it occurs in the
 8 report I would offer the following by means of
 9 explanation, confirmation or refutation."
 10 First heading "'Reasonableness' of calls to
 11 HSH":
 12 "The Expert was unable to make direct
 13 comparisons between similar Outlets due to the
 14 absence of records. While this was true of
 15 audit data formally available to POL, [Fujitsu]
 16 are able to review an unregulated archive of
 17 records of the other installed 6 Counter Outlets
 18 over a comparable period. The table below shows
 19 the output from that analysis ..."
 20 Then if we go over the page to the analysis,
 21 you can see that Cleveleys is in the fifth and
 22 sixth row. Cleveleys [1] is all reports to the
 23 HSH and Cleveleys [2] is if you strip out calls
 24 to the HSH in the course of rollout; do you see
 25 that? Do you see 1 and 2?

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1 A. I see 1 and 2, yes.
 2 Q. There's an explanation at the foot of the page
 3 if we just scroll down.
 4 A. Yes, yes.
 5 Q. So if we go up, please. You'll see that,
 6 assuming that it's appropriate to strip out the
 7 calls during rollout, Cleveleys has a total of
 8 85 calls, and I think that puts it right at the
 9 top, doesn't it? It's the third highest?
 10 A. Yes.
 11 Q. Showing 85 calls in a 10-month period?
 12 A. Yes.
 13 Q. So quite a high number of calls asking for help?
 14 A. Quite a lot, yes.
 15 Q. So Cleveleys was third highest and broadly
 16 comparable with other outlets, wasn't it?
 17 That's what it shows?
 18 A. Yes, I mean, I can't analyse the ratios of all
 19 the different types of calls, but yes.
 20 Q. If we scroll down, we can see what Mr Holmes
 21 thought of it:
 22 "Discounting Rollout Helpdesk calls, which
 23 should have not been addressed to the HSH, it
 24 can be said that in terms of total calls made
 25 (3rd highest from 12) [percentage] that were
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1 would be hard to dispute the opinion of the
 2 Expert."
 3 A. Yeah.
 4 Q. Then over the page --
 5 A. That was the statement from somebody else,
 6 wasn't it?
 7 Q. Yes, he's quoting Elaine Tagg.
 8 A. Elaine, yes.
 9 Q. Thank you. "Operator advice to 'Reboot'",
 10 you'll see what Mr Holmes says. Then in his
 11 second paragraph, Mr Holmes says:
 12 "In this context the opinion of the Expert,
 13 that 'this instruction treats the effect and not
 14 the cause' is correct."
 15 A. Yes.
 16 Q. But it is incorrect to assume that no further
 17 work is being done?
 18 A. Yes.
 19 Q. Under Mr Coyne's heading of "Defective
 20 Equipment":
 21 "The criticism that the technology installed
 22 at Cleveleys was 'clearly defective' is
 23 subjective and based on the raising of 70 HSH
 24 calls over a 10-month period. There is no
 25 attempt to substantiate the claim nor to draw
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1 non-Advice & Guidance (4th highest) and the
 2 [percentage] that were Software based (5th
 3 highest), Cleveleys numbers are broadly
 4 comparable with the group of Outlets."
 5 What did that say to you? What's it
 6 supposed to show?
 7 A. There was nothing particularly standing out,
 8 differentiating Cleveleys from anything else.
 9 Q. They were all getting a high number of calls?
 10 A. Well, I don't know whether they're high or not.
 11 They're just a number of calls. I don't know
 12 whether they're respectively high or not.
 13 Q. Wouldn't you want to know that to draw anything
 14 from it?
 15 A. Well, on the basis that other outlets were not
 16 reporting problems or that we -- at least Post
 17 Office was not dealing with commercial, in terms
 18 of prosecution or then it was broadly the noise
 19 level of the system. So there was nothing
 20 significantly about Cleveleys compared to
 21 anything else.
 22 Q. Anyway, we can see what Mr Holmes said at the
 23 foot of the page:
 24 "Based on the analysis [last line], and
 25 without analysing each and every call record it
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1 any comparisons with external benchmarks."
 2 Whereas this report does compare it with
 3 some other benchmarks and finds that it's
 4 broadly comparable?
 5 A. Yes.
 6 Q. Then "Summary":
 7 "It's difficult to comment on the statement
 8 made by the Expert in this part of his [report
 9 about worrying discrepancies] although he is
 10 alluding to the fact that system errors may be
 11 responsible for this.
 12 "This ... has been put forward by a number
 13 of [postmasters] in the past ... and each time
 14 it has fallen when confronted by transaction
 15 data ..."
 16 This is hardly a withering attack on the
 17 expert, is it?
 18 A. No.
 19 Q. For the most part he says, "We can't really
 20 argue with what he says"?
 21 A. Correct.
 22 Q. In particular, "Because we haven't got the
 23 underlying data, we can't argue with what he
 24 says"?
 25 A. Yes, that's right.
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1 Q. There's no arguing about the qualifications of
 2 the expert?
 3 A. No.
 4 Q. He's not inappropriately qualified or --
 5 A. No, no.
 6 Q. -- inexpert?
 7 A. No, not at all.
 8 Q. There is no quibble on his figures?
 9 A. No.
 10 Q. The figures that he does give are comparable to
 11 other branches and there is no arguing with his
 12 general approach?
 13 A. No.
 14 Q. Can we look, please, at FUJ00121490. If we see
 15 the foot of the page, thank you, we've got
 16 Mr Holmes' email to you of 18th, and then your
 17 email, eight minutes later in the morning; can
 18 you see that?
 19 A. Yes, I can.
 20 Q. "Jan, do we have the data/response that we/POL
 21 have used before which has countered the PM
 22 system problem allegation?
 23 "Colin."
 24 You're picking up that last paragraph,
 25 aren't you, there?"

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1 "In respect of the earlier correspondence
 2 between Jan Holmes ... and Jim Cruise ... we
 3 would be prepared to discuss this further if
 4 this would help progress the situation."
 5 Again, I think that's a reference back to
 6 the August 2003 correspondence?
 7 A. Yes.
 8 Q. If we go over the page, please, to see the
 9 appendix, to see what has now become of
 10 Mr Holmes' report. Can you see it says, "Basis
 11 of Response"?
 12 A. Yes.
 13 Q. "Before addressing individual points from the
 14 Expert's report there are two key areas of
 15 understanding to be established; the first is
 16 the function and objectives of [HSH], the second
 17 is the way that the Horizon System handles
 18 transactions should a reboot be required partway
 19 through a customer [service]."
 20 Under the heading "Horizon System Helpdesk",
 21 there's an explanation of it being the first
 22 line support, and then, in the second paragraph,
 23 the one beginning "Depending on", there's
 24 an explanation of the second, third, and fourth
 25 line supports. Then in the last sentence, three

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1 A. I'm picking up the last paragraph, yes.
 2 Q. Why was your first reaction to seek the data and
 3 response that had previously been deployed
 4 successfully to counter the postmasters' system
 5 problem allegation?
 6 A. I think it was because the expert's report was
 7 an allegation and so we had responded to that,
 8 and, you know, it was an allegation without any
 9 evidence, therefore did we have any evidence?
 10 Q. Can we move forwards then, to FUJ00121512. This
 11 is a copy of the final report that you sent to
 12 Mr Baines, we're now on 20 February. If we see
 13 the foot of the page, your letter to him. Then
 14 up at the top of the page, dated 20 February:
 15 "Dear Keith
 16 "I'm writing in response to your letter of
 17 [you say 6 February, I think it was 5 February]
 18 and note Post Office's concern in respect of the
 19 Expert's opinion that the Horizon System
 20 installed at Cleveleys branch was defective and
 21 that the HSH was more concerned with closing
 22 calls than preventing recurrence of faults.
 23 "An Appendix is attached which sets out
 24 Fujitsu Services' view of and response to the
 25 main points in the Expert's report."

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1 lines from the bottom of that paragraph it says:
 2 "... rebooting the Counter often meets that
 3 objective, this does not mean that a problem is
 4 closed at that point in time, as a detailed
 5 scrutiny of overall problem management process
 6 would reveal."
 7 Then under the heading "Transaction Handling
 8 on Reboot", there's an explanation of what
 9 happens if a postmaster reboots. If we look at
 10 the foot of the page, it is said that:
 11 "If a Session is interrupted pre-settlement,
 12 perhaps through a fault that requires a reboot,
 13 the Session -- and consequently the Session
 14 Stack -- is not maintained and has to be
 15 restarted once the system has been returned to
 16 the postmaster. In 2000 the only exception to
 17 this were Automated Payment transactions."
 18 Then the next paragraph:
 19 "Simply put, the design of the system
 20 precludes the possibility of a Session Stack
 21 being partially, or doubly committed and thus
 22 accounting errors cannot be introduced through
 23 a system crash or forced reboot."
 24 Then the table is reproduced, if we scroll
 25 down under "The Expert's Opinion", yes?

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1 **A.** Yes.

2 **Q.** Over the page, please. A line has been added
3 after "Cleveleys numbers are broadly comparable
4 with the group of Outlets", namely:
5 "It is worth noting that Fujitsu Services is
6 not aware of similar complaints or claims being
7 made from other Outlets in the above list, some
8 of which have higher call profiles than
9 Cleveleys."
10 Did you understand that to mean that we've
11 picked eight or ten other branches and we are
12 not aware of any problems or complaints of
13 a similar nature being raised from them, or was
14 it more broadly there are no similar complaints
15 to the ones raised by Mrs Wolstenholme ever
16 having been made to Cleveleys?
17 **A.** I think he's referring to the above list.
18 **Q.** Why wouldn't you address whether problems of
19 a similar type or complaints of a similar type
20 being made by any other branch?
21 **A.** I couldn't say.
22 **Q.** Wouldn't that be the fair thing to do, rather
23 than pick ten and say, "We haven't had any
24 similar complaints from them, we're not going to
25 tell you about any similar complaints from the
141

1 that we saw. "Summary: Defective Equipment",
2 I think that's the same as the previous draft.
3 Do you remember the passage from Elaine
4 Tagg's witness statement?
5 **A.** Yes.
6 **Q.** That seems to have been omitted. Do you
7 remember the passage from her witness statement?
8 If we just look at FUJ00121486. Second page at
9 the foot, "Statement by Ms Elaine Tagg". You
10 rightly corrected me that this was her speaking
11 and not Mr Holmes:
12 "A total of 101 HSH calls were raised
13 between [9 February] (install date) and
14 [20 November 2000] (termination date) of which
15 15 are classified as Advice and Guidance and 16
16 are to do with the Rollout itself. Based on the
17 analysis, and without analysing each and every
18 call record it would be hard to dispute the
19 opinion of the Expert."
20 If we just go back to FUJ00121512, page 2,
21 and then 3, and then 4, and then 5, it's been
22 cut. Do you know why that was?
23 **A.** Can we go back to the previous page?
24 **Q.** Previous page on here? Yes. Please do scroll
25 down, Frankie.
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1 other 17,000 branches"?

2 **A.** Possibly this analysis was about comparable
3 outlets. So I think it was looking at system
4 problems from comparable outlets, rather than
5 everything else. If it was everywhere else,
6 17,000 outlets, I think the volumes, if there
7 had been such issues, would have been much worse
8 and would have been escalated anyway.
9 **Q.** But there's none of that referenced in here.
10 I mean we know now that the things of which
11 Mrs Wolstenholme complains -- blue screening,
12 balances, double counting on a reboot, money
13 disappearing on a reboot -- was a complaint that
14 many, many postmasters made to Fujitsu. What
15 this appendix does is it picks ten and says, "We
16 haven't had any complaints from them". Do you
17 know why the full picture wasn't revealed?
18 **A.** I couldn't say.
19 **Q.** If we carry on looking at this page, you'll see
20 that, under a series of headings, "Operator
21 advice to 'Reboot':
22 "In this context the opinion of the Expert
23 that 'this instruction treats the effect and not
24 the cause' is correct."
25 Then exactly the same as the previous draft
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1 **A.** So her comment was about HSH calls, wasn't it?
2 **Q.** Yes, and it being difficult to refute what the
3 expert says.
4 **A.** Just go up a little bit.
5 **Q.** Yes.
6 **A.** I'm not sure whether it added anything having it
7 in or taking it out.
8 **Q.** You don't think it made any material difference?
9 **A.** No.
10 **Q.** Why?
11 **A.** Because we're saying it's broadly comparable
12 with everything -- you know, whatever's
13 happening at Cleveleys is broadly in line, and
14 that's what she's saying, effectively.
15 **Q.** Okay, go to the last page, please. The
16 "Conclusion" is now:
17 "The report presented by the expert is based
18 on a simple analysis of HSH records and not
19 a detailed understanding of how the ... system
20 works, or even the prime objectives of the ...
21 Helpdesk. Consequently the opinions expressed
22 in the report, while not always incorrect, do
23 not present the whole story and are presented
24 from a single perspective."
25 What had led to the hardening up of this
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1 report, compared to the first version we looked
2 at?
3 **A.** So, of course, the previous versions were
4 internal versions. I think we were trying to
5 get to the position where we might try and
6 expand the analysis and understanding of the
7 expert and whether, in fact, this was -- if
8 there were elements that we didn't quite agree
9 with, while we're saying that they're not always
10 correct, they don't present the whole story that
11 a balanced report could and should do.
12 **Q.** We're moving forwards now and we're going to end
13 at a point when Fujitsu accused him of bias,
14 essentially, of lacking impartiality. That's
15 where we're going to end up in the questions in
16 about 45 minutes' time. What I'm asking now is
17 what had led to this hardening up of a position?
18 There was the internal document, which didn't
19 question his qualifications, didn't really
20 question his methodology and said, "We're in the
21 same position as him: we haven't got that much
22 data to go on, we can't really question what he
23 says".
24 Now, that's being ratcheted up a bit, isn't
25 it? They do not present the whole story, they

1 Coyne of Best Practice Group has been sent to
2 him and his reply is attached. He has not taken
3 on board any of the points made and has not
4 revised his report at all.
5 "I would welcome any further points you have
6 to make on his further report but it seems to me
7 that his report cannot be accepted by [the Post
8 Office] and that an application needs to be made
9 to the court for Fujitsu to give evidence about
10 the Horizon System and its working in view of
11 the stance taken by the expert witness."
12 Then if we can go to FUJ00121535. This is
13 Mr Coyne's reply. Under the heading "Horizon
14 System Helpdesk", he says:
15 "... this is a matter for the Post Office
16 and Fujitsu", ie describing the system of
17 escalating help and service desks:
18 "[But] nothing contained within this section
19 of the letter alters my current opinion.
20 "Transaction Handling on Reboot.
21 "Whilst this section is helpful and assists
22 my understanding ... it would not be proper of
23 me to alter my opinion based on this
24 explanation, the supporting evidence of which
25 has been destroyed.

1 are presented from a single perspective.
2 I don't know what that means, but it seems
3 rather critical, doesn't it?
4 **A.** Yes, it's critical of the report.
5 **Q.** So what had led to the hardening up?
6 **A.** It can only be -- well, I'm not absolutely sure.
7 I don't absolutely remember but, of course,
8 Fujitsu is trying to defend Horizon, all the
9 systems that go around it, support systems and
10 everything else and, therefore, we trying to
11 position it -- to put a position to Post Office
12 that we want to present the whole story.
13 **Q.** Can we move on, please. FUJ00121533. This is
14 an email of 4 March and what we're going to see
15 is, in this chain, you getting back the expert's
16 response to your response.
17 **A.** Yes.
18 **Q.** So this is the Post Office lawyer, Jim Cruise,
19 sending you and others an attachment. Then if
20 we go to FUJ00121534, we can see what the
21 attachment is. It's an email which itself had
22 an attachment, and this is the response from
23 Susanne Helliwell, the solicitor at Weightmans',
24 Secretary:
25 "The response to the initial report of Jason

1 "Reasonableness of calls.
2 "It has always been my expressed position
3 that direct comparisons of calls to HSH are
4 required and your clients position that they
5 have been destroyed, barring direct comparison,
6 and that I should give opinion on the surviving
7 material that is available ...
8 "Now it seems that your client has located
9 data that they believe enables comparison.
10 Although the raw data has not been made
11 available to me they say it displays that
12 Cleveleys is 'broadly comparable'. As I do not
13 have the raw data I am unable to say if my
14 opinion is effected or not."
15 At the foot of the page he says:
16 "... all of these issue factors are
17 significantly higher for Cleveleys than the
18 respective mean which is inconsistent with the
19 statement of broadly comparable when considering
20 these measurements."
21 Then over the page:
22 "Although I must stress that no raw data has
23 been presented so I am disadvantaged, is it your
24 clients intention to rely upon this data sample
25 referred to in this letter?"

1 Next two paragraphs I can skip over,
 2 "Worrying discrepancies":
 3 "I'm unsure how this can be resolved as the
 4 documentation suggests the [postmaster] reported
 5 discrepancies that seem to fall after a reported
 6 upgrade ...
 7 "In short, to answer the question posed in
 8 your letter, No my opinion, currently, remains
 9 as state in my original note."
 10 So this is a pretty firm reply from the
 11 independent expert, isn't it?
 12 **A.** It is.
 13 **Q.** Did you think it called for a rethink by
 14 Fujitsu?
 15 **A.** I think we waited for Post Office to see what
 16 their instruction was going to be and how they
 17 wanted us to support them.
 18 **Q.** Was there ever any discussion of bringing in
 19 somebody else, somebody independent of Fujitsu
 20 to look at what this expert was saying, to see
 21 whether it was entirely off the wall or there
 22 may actually be substance in it?
 23 **A.** Not with me.
 24 **Q.** Were you aware of any discussions amongst other
 25 people?

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1 "I've done a bit more to this but if
 2 I continue I fear I might call him a git, or
 3 something worse."
 4 Did you take that to be a good sign of
 5 objectivity of thought?
 6 **A.** I think I just took it as being a moment of
 7 irritation.
 8 **Q.** Why would you be irritated? Why would he be
 9 irritated?
 10 **A.** I don't know.
 11 **Q.** Why did you take it to be a moment of
 12 irritation?
 13 **A.** I think I ignored it.
 14 **Q.** Why?
 15 **A.** Well, he was going on holiday and he was trying
 16 to do something to get something out, and what
 17 have you, so I think we -- it was just in the
 18 heat of the moment.
 19 **Q.** No, he's been on holiday. This is when he's
 20 come back?
 21 **A.** Oh, sorry.
 22 **Q.** He went on holiday on the 4th and said, "These
 23 are my initial thoughts".
 24 **A.** I'm not sure. I don't know why he's irritated
 25 by it.

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1 **A.** I'm not aware of any other -- I don't know.
 2 I couldn't say yes or no.
 3 **Q.** You were disappointed with this response from
 4 the expert, weren't you?
 5 **A.** Yes.
 6 **Q.** If we look, please, at FUJ00121549, in fact we'd
 7 better look at FUJ00121541, first, thank you.
 8 4 March, same day at 11.30, you send Mr Holmes
 9 the disappointing response from the expert.
 10 Yes?
 11 **A.** Yes.
 12 **Q.** If we then go to FUJ00121549, he replies at
 13 1.45, so 2 hours 15 minutes later, attaching his
 14 initial thoughts. Then if we go to FUJ00121550,
 15 this is Mr Holmes's initial response. I'm not
 16 going to go through all of this but would
 17 a summary be, "We need to try to get the expert
 18 in to Fujitsu premises to see whether we can get
 19 him to alter his opinion"?
 20 **A.** Yes.
 21 **Q.** Mr Holmes then goes on holiday for a week, and
 22 produces a final version of this document,
 23 FUJ00121557. This is now dated 11 March and is
 24 the final version. I should have shown you the
 25 covering email, thank you:

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1 **Q.** He's come back on the 11th after a week,
 2 presumably being refreshed, thinking that --
 3 **A.** Sure. I don't know why he's irritated by it.
 4 **Q.** -- the expert is a git?
 5 **A.** Well, I don't know.
 6 **Q.** Is this emblematic of what was really going on
 7 within Fujitsu --
 8 **A.** No.
 9 **Q.** -- people that criticise us are to be condemned?
 10 **A.** No.
 11 **Q.** People that have the temerity to question the
 12 quality of our product are to be condemned?
 13 **A.** No.
 14 **Q.** Let's look at the substance of what he said.
 15 FUJ00121558, please. I'm going to take this
 16 shortly. You have seen this. It has been
 17 disclosed to you. You've read it.
 18 **A.** Yes.
 19 **Q.** Would you agree that the suggestion that "Let's
 20 have him in and see whether we can get him to
 21 alter his view" has gone and that, in its place,
 22 is essentially a hardening up still further of
 23 the position against the expert? If you want to
 24 take a moment to read it all, then please do.
 25 **A.** No. So I think we were trying to provide

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1 further information and clarity to the expert,
 2 to provide him with the access to the data and
 3 the records that we said we had and he said he
 4 hadn't got access to.

5 **Q.** Okay. If we move on, please, to FUJ00121561.
 6 The next day, 12 March, Mr Holmes emails you,
 7 setting out at the bottom of the page, if we
 8 just scroll down, a draft email for you to
 9 consider. Then go back to the top of the page.
 10 He says:

11 "Colin,
 12 "Draft email to Jim Cruise for you to
 13 consider. I've transferred the contentious
 14 statements from the paper to the email because
 15 it's not in our interests to piss the Expert
 16 off. That said it has to be pointed out to Jim
 17 that his report is far from impartial ..."

18 Did you agree with that, that the expert's
 19 report was not impartial?

20 **A.** I'm not sure about "far from impartial".

21 **Q.** What about a little bit from impartial?

22 **A.** Well, I think a little bit from impartial, yes.

23 **Q.** Why was he not impartial?

24 **A.** Because I think the -- having read the report
 25 again, I thought it was quite high level.

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1 **Q.** Why hadn't you had that opportunity?

2 **A.** Because we had only invited -- through Post
 3 Office, we'd invited the expert to Fujitsu's
 4 premises to review the data. So it was
 5 an invitation to Post Office to carry that
 6 forward.

7 **Q.** Well, that was on the internal draft. That
 8 never got sent, did it? "Let's get him in",
 9 that draft.

10 **A.** No, at the top of the last one, it said, "We
 11 even invited him to Bracknell" or --

12 **Q.** That one?

13 **A.** Yeah.

14 **Q.** Did you think that was the solution to the
 15 problem?

16 **A.** I thought it might help.

17 **Q.** Scrolling down on this page, just before we take
 18 the break, you'll see in the draft, you'll see
 19 in the draft email it says in the third
 20 paragraph of the draft email:

21 "The attached paper provides detailed
 22 feedback to his reply but in truth we can only
 23 reiterate what has been already said. Given
 24 that he has assumed the moral high ground, and
 25 appears not to want to shift his position, the

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1 **Q.** Does that make somebody impartial?

2 **A.** Yes.

3 **Q.** Why?

4 **A.** Well, not that the -- the brevity of it doesn't
 5 make it impartial.

6 **Q.** He continues:

7 "... in truth, we have a problem because
 8 there is little we can do to dispel some of his
 9 assertions other than say 'rubbish'. We can't
 10 demonstrate that everything worked correctly
 11 because we don't have the data. In addition,
 12 any proving that we do now is at a 2004 system
 13 baseline and not a 2000 baseline. POL have to
 14 decide what they want to see happening here.
 15 I understand the reputational aspects of the
 16 situation but I fear that POA [that's Fujitsu]
 17 are on the back foot."

18 **A.** Yes.

19 **Q.** Why did he think that Fujitsu was on the back
 20 foot?

21 **A.** Because we hadn't had the opportunity to try to
 22 provide additional material to the expert.

23 **Q.** You hadn't had the opportunity to?

24 **A.** Provide the data that we had come up with to
 25 the -- which the expert said he hasn't got.

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1 next step is to make available to him the
 2 people, data and resources at Post Office
 3 Account and allow him to address his doubts to
 4 the true experts and practitioners."

5 You approved this and it went out in this
 6 form, correct?

7 **A.** Yes.

8 **Q.** Mr Holmes is suggesting that Mr Coyne be allowed
 9 to address his doubts to the "true experts".
 10 Did you think that Mr Coyne was not a true
 11 expert?

12 **A.** So Mr Coyne was an IT expert and not a Horizon
 13 expert.

14 **Q.** So you didn't think he was a true expert?

15 **A.** No, I didn't say that.

16 **Q.** He wasn't sufficiently expert in Horizon?

17 **A.** Correct.

18 **Q.** So the "true experts" were located only within
 19 the Fujitsu premises at Bracknell, were they?

20 **A.** They would only -- the ones who would know --
 21 well, not necessarily, but mostly that they
 22 would know the system and the processes that
 23 went around it.

24 **Q.** It continues:

25 "In conclusion it has to be said that his

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1 analysis of the situation is at best selective
 2 and at worst simply wrong, and his conclusions
 3 are partial."
 4 So again, accusing him of lacking
 5 impartiality, yes? You understand what
 6 partiality means, don't you?
 7 **A.** Yes.
 8 **Q.** Favouring one size in the dispute over the
 9 other?
 10 **A.** Yes.
 11 **Q.** In other words, are you being biased?
 12 **A.** Yes.
 13 **Q.** On what evidence were you happy to sign this
 14 off, that the independent expert was biased?
 15 **A.** Probably because of his -- his responses were
 16 unshifting.
 17 **Q.** Un?
 18 **A.** Unshifting.
 19 **Q.** So somebody who doesn't move from their opinion
 20 is biased?
 21 **A.** No, what I've said is what I've said.
 22 Potentially, I go back to this data available --
 23 availability, it's kind of a cross between
 24 the -- and the email -- the email chain, really,
 25 here, that the data that was available was
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1 afternoon break now until 3.20.
 2 **SIR WYN WILLIAMS:** Yes, certainly.
 3 **MR BEER:** If it helps, I'll conclude by 4.00,
 4 allowing some time for other Core Participants
 5 to ask questions if they wish.
 6 **SIR WYN WILLIAMS:** All right, fine.
 7 **MR BEER:** Thank you. 3.20.
 8 (3.05 pm)
 9 (A short break)
 10 (3.20 pm)
 11 **MR BEER:** Good afternoon, sir. Can you see and hear
 12 us?
 13 **SIR WYN WILLIAMS:** Yes, I can, thank you.
 14 **MR BEER:** Thank you.
 15 Mr Lenton-Smith, can we turn to FUJ00121602,
 16 please. We've now moved forward to April 2004,
 17 and there's an email from Jim Cruise at the foot
 18 of the page to Jan Holmes and Keith Baines,
 19 which is forwarded by Jan Holmes on the same day
 20 to you. Can you see that?
 21 **A.** Yes, I can.
 22 **Q.** In the email from Jim Cruise, he says:
 23 "The latest development in this case is that
 24 POL have written off the losses of just over
 25 £25,000 at the above SPO and have increased
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1 offered, the visits were offered and, you know,
 2 from our particular position, he has his own
 3 view -- his view, and not necessarily -- we're
 4 saying that maybe his conclusions are partial.
 5 Okay. You know, that's his view.
 6 We said that he was not -- we didn't think
 7 he was completely correct, so that in which
 8 instance that must be that he must be partial.
 9 **Q.** So somebody who is incorrect is always partial
 10 and therefore biased?
 11 **A.** You can come to conclusions from data that is
 12 not complete.
 13 **Q.** Does that make you partial and therefore biased?
 14 **A.** It may not make you partial but it may make you
 15 biased.
 16 **Q.** Was the thought process that you have just
 17 explained to us one that was common within
 18 practitioners within Fujitsu, who were
 19 discussing this issue?
 20 **A.** So within the practitioners who were discussing
 21 it in Fujitsu, I think we were trying to make
 22 all opportunities available in order to come up
 23 with a rounded position.
 24 **MR BEER:** Yes, thank you.
 25 Sir, I wonder whether we could take the
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1 their payment-in to court to £25,000 ...
 2 "The hope is that she will accept the
 3 increased payment-in and the case will be
 4 concluded. If she does not and persists with
 5 her counterclaim, and she has indicated that she
 6 is looking for a figure of £187,500 so she may
 7 not settle, she is on increased risk as to the
 8 costs in the case if she does not beat the
 9 payment-in at trial. As [Post Office] is no
 10 longer pursuing her for losses, I hope that she
 11 will be left to pay any further evidence/reports
 12 from the expert witness, which should be
 13 a further discouragement for her."
 14 So that was updating you in April and if we
 15 move on to FUJ00121637, an email directly to you
 16 from Jan Holmes of 7 June 2004, with the subject
 17 of "Cleveleys". He says:
 18 "I've just updated myself with the latest on
 19 this case and the news is not good.
 20 "Jim Cruise has taken early retirement so
 21 I ended up speaking to Mandy Talbot, who was his
 22 boss. The [postmaster] rejected the offer that
 23 was made to her some time ago and a trial date
 24 has been set for August ... The [Post Office]
 25 are still taking advice as to how best to deal
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1 with this and Mandy's view/belief was that the
2 safest way to manage this is to throw money at
3 it and get a confidentiality agreement signed.
4 She is not happy with the 'Experts' report as
5 she considers it to be not well balanced and
6 wants, if possible, to keep it out of the public
7 domain. This is unlikely to happen if it goes
8 to Court.

9 "She was talking about taking the option to
10 admit the report and concede that the contents
11 are an accurate reflection of what happened (the
12 HSH transcripts are an accurate reflection of
13 what happened it's just the 'Expert' opinion is
14 the problem). The liability question is removed
15 and then it's just about 'how much [money] to go
16 away and keep your mouth shut'.

17 "One concern I have is while they've been
18 dickered about waiting for guidance from their
19 agents, the trial date has been set and it is
20 now too late for them to enter a Witness
21 Statement that might further repudiate the
22 Expert's original report. This means that their
23 Counsel might have to have thorough briefing, by
24 us, before going to Court.

25 "Do we need to involve Masons at this
161

1 **A.** It was his question to me, so he's not
2 a commercial person. He's just asking me
3 a question.
4 **Q.** Yes, what did you think of the suggestion?
5 **A.** Do we have my response to him? No. So this is
6 just an update and that didn't go any further
7 than that.
8 **Q.** Do you think it was necessary to involve
9 solicitors?
10 **A.** No.
11 **Q.** What did you think as to the strategic of paying
12 Mrs Wolstenholme enough money to "keep your
13 mouth shut"?
14 **A.** So, remember, Fujitsu was a supplier to Post
15 Office, maybe a big supplier. So we are a third
16 party, effectively, who -- we don't get involved
17 in persuading or suggesting to our clients how
18 they should conduct their legal matters.
19 **Q.** Was there any sense at this stage -- did you
20 pick up any sense from Mr Holmes at this
21 stage -- that the Post Office might be trying to
22 blame Fujitsu for being in this position?
23 **A.** No.
24 **Q.** Can we look, please, at FUJ00121668. This is
25 an email to you from Mr Holmes of the following
163

1 stage?"

2 Did the contents of this email reflect your
3 understanding of POL's principal desire, namely
4 to keep the adverse expert's report out of the
5 public domain?

6 **A.** I didn't know what POL's objective was.

7 **Q.** Did you engage in any telephone discussion with
8 anyone at POL, Keith Baines, for example --

9 **A.** No.

10 **Q.** -- about this case?

11 **A.** No.

12 **Q.** Who were Masons?

13 **A.** Pinsent Masons, solicitors.

14 **Q.** Why would it be necessary to involve a firm of
15 solicitors at that stage?

16 **A.** I think this is just Jan's question to me, high
17 level question, internally. I don't think we
18 did.

19 **Q.** What was the risk for Fujitsu in this process?

20 **A.** In what process?

21 **Q.** A claim was being brought by the Post Office
22 against one of its former subpostmistresses, she
23 had counterclaimed, what's the risk to Fujitsu?

24 **A.** On that basis, none.

25 **Q.** Why might you involve solicitors?
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1 month:

2 "The PO Legal person, Mandy Talbot, is on
3 holiday today but will be back on Monday ...

4 "I've also spoken to Keith Baines who
5 alluded to a number of other calls that he was
6 going to have to make on the case but didn't
7 pass any details to me. He said that Dave Smith
8 would be speaking to Ian on the subject ..."

9 Can you help us who this Dave Smith referred
10 to here is?

11 **A.** Dave Smith was the lead in Post Office for
12 effectively managing the Horizon System.

13 **Q.** Who would Ian be?

14 **A.** Ian Lamb.

15 **Q.** What role did Ian Lamb perform?

16 **A.** He was the Managing Director, effectively, of
17 Post Office Account.

18 **Q.** In Fujitsu?

19 **A.** In Fujitsu.

20 **Q.** So a high level discussion --

21 **A.** Yeah.

22 **Q.** -- at proper director level?

23 **A.** Director level, yeah. Although I don't think
24 Ian was, in fact, a director, a registered
25 director as such.
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1 Q. He continues:
2 "... it seems that Dave believes 'we' (not
3 sure whether that's the Royal we or just us)
4 have conceded what 'we' should not have done and
5 POL are now in a difficult position. Given our
6 late involvement by POL I trust he's not trying
7 to park it all on us."

8 That's what I was referring to a moment ago
9 when I asked whether you had any sense from
10 Mr Holmes that POL would be trying to blame
11 Fujitsu for being in the position they were in.

12 A. No, I don't believe so. I don't read it like
13 that. I think this is Ian -- this is Jan's
14 interpretation of a conversation but this is,
15 you know, a fourth-hand conversation between
16 Dave Smith and Ian, and Dave Smith and Keith
17 Baines, and Keith Baines and Jan Holmes, and
18 then me, so I think it must -- you know, it
19 could -- it's kind of hearsay, really.

20 Q. Can we move forwards, please. FUJ00121724.
21 We're now in the next month, August, on the
22 20 August, an email from Jan Holmes to you and
23 Bill Mitchell; can you see that?

24 A. Yes.

25 Q. What role did Bill Mitchell perform?
165

1 Fujitsu providing litigation support to Post
2 Office?

3 A. Could be either -- could be that, I don't know.
4 I couldn't say.

5 Q. It's difficult to say, isn't it --

6 A. Yes.

7 Q. -- through that fantastic use of the word
8 "around"? He continues:

9 "1. Although Cleveleys may appear to be
10 closed it could be construed that [Post Office]
11 bought off Mrs Wolstenholme rather than defend
12 their system."

13 Do you agree with the suggestion that it
14 appeared or may appear that Post Office had
15 bought off Mrs Wolstenholme rather than defend
16 their system?

17 A. Again, I'd go back to the comment before. It's
18 simply down to Post Office how they would have
19 defended their legal cases, effectively, and
20 whether they decided to settle out of court or
21 go to court is a matter for them.

22 Q. That's an answer to a different question, namely
23 whose responsibility and function is it to
24 decide whether or not Post Office defend or
25 settle cases? The answer is the one you've just
167

1 A. I'm not sure. I think there is a witness
2 statement from him in the bundle and I'd have to
3 refer to that to --

4 Q. Okay, you can't remember now?

5 A. I can't remember his role, no.

6 Q. The title is risk position on litigation
7 support.

8 A. He -- well, he could have been -- he could have
9 been the Risk Manager, I guess, but I'd have to
10 go and check that.

11 Q. He says:

12 "Colin, Bill.

13 "Following on from the Cleveleys outcome,
14 what looks like the reappearance of Shobnall
15 Road and the possible outcome of that case
16 I believe we should consider a risk position
17 around litigation support."

18 What do you understand "a risk position
19 around litigation support" to mean?

20 A. So my initial -- I mean, I can't remember
21 precisely 2004, but I think it would be
22 assessing to see whether we needed -- whether
23 Fujitsu needed litigation support, if there was
24 a risk in trying to defend the system.

25 Q. Oh, I see, rather than assessing the risk of
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1 given: it's a matter for Post Office.

2 My question was a different one. Did you
3 agree with the suggestion that it may appear
4 that the Post Office had bought Mrs Wolstenholme
5 off, rather than defend their system?

6 A. I don't think it's for me, on behalf of Fujitsu,
7 to construe anything for them, why they -- how
8 they defended their case.

9 Q. Mr Holmes continues in his email to you:

10 "Even if a gagging order is placed on the
11 woman ..."

12 I think "the woman" is Julie Wolstenholme,
13 yes?

14 A. Yes.

15 Q. "... she apparently had a gaggle ..."

16 I think a "gaggle" here in this context
17 means a group of disorderly people, rather than
18 a flock of geese, agreed?

19 A. Mm-hm.

20 Q. "... lined up to support her case and they [may
21 well be aware] of what the final outcome was."

22 Is that how Fujitsu viewed matters, that the
23 subpostmistress was to be referred to as "the
24 woman" --

25 A. No.

1 Q. -- who had a "gaggle", a disorderly group of
 2 people, surrounding her?
 3 A. No.
 4 Q. He continues:
 5 "I'm sure they will not be keeping quiet.
 6 It is not clear why Post Office chose to settle
 7 rather than fight although I suspect they
 8 realised that to expose the HSH transcripts in
 9 Court would not help their case -- personally
 10 I can understand that position."
 11 Why would exposure of the HSH transcripts in
 12 court not help their case?
 13 A. Oh, I don't know, I don't think it would.
 14 I think -- I don't think it undermines the case.
 15 Q. So the revelation of 85 transcripts of
 16 Mrs Wolstenholme calling over a 10-month period,
 17 setting out a succession of recurring problems,
 18 causing unexplained discrepancies and balancing
 19 errors, would have helped their case, would it?
 20 A. No.
 21 Q. So what he's saying is right, isn't it,
 22 Mr Holmes (*sic*)?
 23 A. What Mr Holmes is saying is right, yes.
 24 Q. Exposing the transcripts wouldn't have helped
 25 their case?

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1 A. Yes.
 2 Q. Why would revelations of transcripts therefore,
 3 if that was true, not help the Post Office's
 4 case?
 5 A. Well, I've got nothing to compare -- I don't
 6 know what the transcripts said. You told me
 7 that there are number of pages, but I don't know
 8 whether they're comparable to the other
 9 transcripts of the other examples that were
 10 shown in the table.
 11 Q. According to Mr Holmes, the number of them were.
 12 A. There were comparable number of calls, so the
 13 transcripts were probably comparable.
 14 Q. I don't understand, you see, the reports that he
 15 was giving to you, a version of which you sent
 16 on, was saying to the Post Office "There's
 17 nothing to see here with these HSH calls".
 18 A. Exactly, yes.
 19 Q. Yet here, you're discussing internally, "I can
 20 completely understand, I can understand that
 21 public revelation of the transcripts in court
 22 won't help the Post Office's case". It doesn't
 23 add up, does it?
 24 A. So it's kind of -- I'm in speculation here, so
 25 I've got nothing to substantiate it. But

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1 A. It wouldn't have done, no.
 2 Q. No. He's right, isn't he?
 3 A. He's right.
 4 Q. By throwing money at the problem, buying "the
 5 woman" off, with or without a gagging order, the
 6 Post Office were ensuring that what was revealed
 7 by these transcripts was not likely known,
 8 wasn't it?
 9 A. It would appear so.
 10 Q. He continues in paragraph 2 --
 11 A. I mean, that's his language, not mine.
 12 Q. Did you write back to him and say --
 13 A. I don't know, is there another email?
 14 Q. No.
 15 A. No. I don't know.
 16 Q. Can you help us with this: we've seen the
 17 earlier report from Mr Holmes to you commenting
 18 on Mr Coyne's document, and then we've seen the
 19 version that was sent to the Post Office. In
 20 both of those, it was said that the number and
 21 nature of the calls were all perfectly normal,
 22 that they weren't indicative of any system
 23 problem and that, in general terms, they were
 24 usual in the operation of a complex computer
 25 system?

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1 I don't know whether there's anything
 2 significant about the HSH transcripts for
 3 Cleveleys, compared to the HSH transcripts for
 4 the other examples that were in the table. So
 5 I can't comment whether it's just the extent of
 6 transcripts is an issue or whether there is
 7 anything more significant than that.
 8 Q. He continues:
 9 "Shobnall Road has come back."
 10 Do you know what Shobnall Road was?
 11 A. I assume it was another Post Office.
 12 Q. "Bill has apparently been asked to provide
 13 a Witness Statement to the effect that nothing
 14 contained in the HSH calls over the period in
 15 question could have caused, or be described as,
 16 a system malfunction. I'm attaching a brief
 17 analysis of the HSH transcripts that I did in
 18 April. Comments made by engineers that
 19 'keyboards can cause phantom transactions' do
 20 not help the Post Office's position. I suspect
 21 that we cannot make the statement required ..."
 22 That's the statement that nothing contained
 23 in the calls over the period in question could
 24 have caused or be described as a system
 25 malfunction.

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1 A. Yes.

2 Q. "... and when [Post Office] read the transcripts
3 in detail they may well think that they could
4 not submit them anyway.

5 "3. How many more Cleveleys and Shobnall
6 Road howlers exist in the HSH archive? Two out
7 of two is a bit of a worry.

8 "4. How long before Post Office realise
9 that they cannot rely on HSH transcripts to
10 counter claims made by postmasters that they
11 want to prosecute, or have to defend against
12 claims of wrongful dismissal, and seek to
13 recover settlement costs from Fujitsu?

14 "I think this warrants a bit more thought."

15 Was a bit more thought given, after receipt
16 of this email, to your recollection?

17 A. There was the report that was an internal report
18 which was written about the Cleveleys case.

19 Q. Yes, the September 2004 report?

20 A. Yes.

21 Q. That doesn't really make any recommendations,
22 does it?

23 A. No.

24 Q. It's just a straight up and down narration of
25 what happened?

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1 a request for assistance from Post Office
2 counsel. Do you know what that was?

3 A. No, I can't.

4 Q. Is the Post Office and their counsel helping
5 Fujitsu update its internal report?

6 A. Well, we haven't got previous versions.

7 Q. No.

8 A. I can't remember.

9 Q. If we go to page 4, please, and look under "The
10 Expert's Report", the report says:

11 "The Expert, who was supposed to be jointly
12 appointed ..."

13 To your recollection, was he jointly
14 appointed, ie by Post Office and not
15 Mrs Wolstenholme.

16 A. I believe so. The court appointed him, didn't
17 it? Requested it, I believe so.

18 Q. It's just the use of the language "He was
19 supposed to be jointly appointed". Was there
20 any suggestion that he wasn't jointly appointed
21 and he was only appointed by Mrs Wolstenholme
22 and the Post Office didn't have anything to do
23 with it?

24 A. I can't comment on it.

25 Q. Over the page, please. Third paragraph:

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1 A. It -- yeah.

2 Q. But I'm talking about whether this opportunity
3 was seized to grip the problems that had been
4 revealed?

5 A. So, on the face of it, none of this is
6 a commercial issue, in other words affecting
7 discussion between Post Office Commercial and
8 Fujitsu. It's kind of an operational matter
9 dealt with through the service organisation. So
10 any taking forward of these issues would have
11 been done at that level.

12 Q. Can we look at that report, please.

13 FUJ00121747. You'll see this is dated
14 1 September, it's written by Jan Holmes and at
15 the foot of the page you gave approval for it?

16 A. Yes.

17 Q. In the abstract it states that it:

18 "... describes the involvement of Fujitsu
19 ... with Post Office Security Investigation in
20 the matter of Cleveleys post office and the
21 dispute between the Post Office and the
22 postmaster."

23 If we look at the second page, please. It
24 appears to have been initially drafted on
25 29 March and then updated on 3 August following

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1 "We have offered to host him at any of our
2 locations so he can analyse HSH data directly,
3 speak to the experts and walk through the
4 problem management cycle for himself. He will
5 not have seen this offer since it was contained
6 in the email that accompanied our final response
7 and this has not been passed on to the Expert
8 pending the outcome of an out-of-court
9 settlement by [Post Office] to the
10 [postmaster]."

11 So it was known by you within Fujitsu that
12 the offer to the expert to come and visit the
13 premises and meet the real experts had not got
14 through to him?

15 A. So it had -- so it transpired, yes.

16 Q. Wasn't that the basis of some of your criticism
17 earlier, that he hadn't taken up the offer?

18 A. No, I said he had not been able to take up the
19 offer.

20 Q. Because it had never been made to him?

21 A. Yes, we had made it -- I said we had made it to
22 Post Office to pass on to him.

23 **SIR WYN WILLIAMS:** I've got this right, I think.
24 You made the suggestion that various offers
25 should be made to the expert, put them to Post

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1 Office, but Post Office never put them to the
 2 expert; is that correct?
 3 **A.** That's correct sir, yes.
 4 **MR BEER:** Thank you.
 5 Can we lastly turn to FUJ00121636. These
 6 are the minutes of a meeting called the Horizon
 7 Commercial Forum held on 28 April 2004, jointly
 8 between the Post Office and Fujitsu. Can you
 9 explain what the Horizon Commercial Forum was,
 10 please?
 11 **A.** Yes. So this was the two commercial Teams
 12 meeting periodically, I think monthly, or
 13 thereabouts, to review ongoing commercial issues
 14 coming out of the contract and financial matters
 15 coming out of the contract to do with invoicing
 16 and various other matters like that. So it was
 17 an ongoing set of minutes on discussions taken,
 18 actions taken, noted and a follow-up of actions.
 19 **Q.** We can see that there's three from each party
 20 present, three members of each party present --
 21 **A.** Yes.
 22 **Q.** -- one of which is you?
 23 **A.** Yes. That's right.
 24 **Q.** How frequently did the Commercial Forum meet?
 25 **A.** I was going to say monthly, but it's probably
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1 that email.
 2 **A.** I thought in that document we had said that, in
 3 my witness statement, we put that KB advised
 4 that Post Office were trying to negotiate
 5 a settlement at the time, they suggested
 6 a discussion should be held with both parties at
 7 some future time to understand how the situation
 8 regarding the expert could be avoided in the
 9 future. That was that.
 10 **Q.** Yes, if you just look at page 3.
 11 **A.** Yes.
 12 **Q.** So if we go back to FUJ00121636, and look at
 13 page 3, and look at the third box down. There's
 14 the passage that you're just referring to:
 15 "KB advised that the Post Office were trying
 16 to negotiate a settlement with regard to the
 17 Julie Wolstenholme case.
 18 "[Keith Baines] further suggested that
 19 a discussion should be held between both parties
 20 at some future date to understand how the
 21 situation regarding the 'Expert' could be
 22 avoided in the future."
 23 **A.** Right.
 24 **Q.** That seems to be a suggestion, would you agree,
 25 that Fujitsu and POL need to discuss how
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1 there or thereabouts. Monthly or two monthly,
 2 but frequently.
 3 **Q.** Can we turn, please, to page 5, and look three
 4 rows from the bottom:
 5 "KB, [that's Keith Baines] suggested that
 6 when the 'Cleveleys' court case had been
 7 concluded, a review is undertaken to find
 8 improvements in information storage for future
 9 cases."
 10 **A.** Yes.
 11 **Q.** Was such a review undertaken?
 12 **A.** I don't remember specifically, unless we have
 13 access to the subsequent minutes of the Forum
 14 beyond this.
 15 **Q.** To your knowledge, was there ever anything more
 16 broadly contemplated, rather than a review about
 17 storage of information but a review of the
 18 substance of what the independent expert had
 19 said?
 20 **A.** This is the final version of 16, is it?
 21 **Q.** Yes. If we go to FUJ00121632, this is the email
 22 distributing the "Commercial Forum Minutes No 16
 23 (Final)". If we scroll down, please. It says,
 24 "Pam, please find 'final' minutes attached", and
 25 the document I've shown you was an attachment to
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1 an expert like this might be appointed in the
 2 future, and how we could avoid getting an expert
 3 like this rather than examining the substance of
 4 what the expert said and seeing whether it might
 5 be accurate or not, which is what I was asking
 6 about?
 7 **A.** Yeah, so I think it's reliance on non-expert
 8 data, so not relying on an expert.
 9 **Q.** What did you understand that the discussion in
 10 the future between both parties to be about --
 11 **A.** Ensure that there was enough data evidence to
 12 support the system, given the context of how
 13 Commercial Fujitsu and Commercial Post Office
 14 viewed the system at the time.
 15 **Q.** Did that happen?
 16 **A.** As I say, I'd have to go back to the subsequent
 17 minutes after 16 to review what happened to that
 18 action point.
 19 **Q.** You've got no independent recollection. We've
 20 got the minutes.
 21 **A.** If you have the minutes -- I don't know but,
 22 I mean, if you can share the minutes.
 23 **Q.** Well, the subsequent minutes don't translate
 24 that action into an action.
 25 **A.** Potentially, I think that the matter passed
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1 away, in other words there wasn't the
2 requirement for the expert because the number of
3 instances that were raised at a commercial level
4 in terms of prosecutions was so few.

5 **Q.** What about the fact that the Post Office was
6 using the self-same system as the basis for
7 prosecuting people?

8 **A.** Can you just repeat the question?

9 **Q.** Yes. What about the fact that the Post Office
10 was using the self-same system, Horizon, and the
11 data that it produced, as the basis for
12 prosecutions? Did anyone mention that in this
13 context, "We've had an expert report from
14 somebody, we don't much like it, but we ought to
15 check somehow to see whether what he's saying
16 might have substance because we're using this
17 system to prosecute people, some of whom are
18 going to go to prison, some of whom -- families
19 are going to be broken up, some of whom are not
20 going to see their children".

21 **A.** I understand that. I understand all of that.
22 But at this point in time, I think there was
23 just reliance on the system. I go back to the
24 witness statements, you know, the commercial
25 view was the system was reliable.

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1 to capacity limits of Fujitsu ... could purchase
2 others at additional cost. The system would
3 have been fully checked before being issued at
4 Cleveleys ...

5 "Every branch has the same type of equipment
6 ..."

7 (5), and I think this is the paragraph that
8 you're referring to:

9 "Any faults that occurred in the Horizon
10 System were eliminated once they were
11 identified. Whilst it is possible for mistakes
12 to occur, this usually through incorrect
13 inputting to the computer system in the office
14 affected by the mistake. All subpostmasters
15 were fully trained in the use of the Horizon
16 equipment. The system was fully tested before
17 it was used by the Post Office and it is fit for
18 its purpose. The system itself does not create
19 losses as is claimed by Mrs Wolstenholme."

20 Is that the long and the short of what you
21 describe as the commercial view?

22 **A.** Yes.

23 **MR BEER:** Mr Lenton-Smith, thank you very much.
24 They're the only questions I ask.

25 I think there are some questions from
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1 **Q.** What was that view based on?

2 **A.** Based on the fact that they had produced data --
3 or they hadn't come up to commercial, there had
4 been instances where they had used the system's
5 data to show that transactions were not -- that
6 the system was correct.

7 **Q.** I think what you're referring to here is, in
8 particular, Mr Baines's witness statement; is
9 that right?

10 **A.** Partially that but also the point that there
11 were, in discussions we've had earlier on from
12 Jan Holmes, was that in the past, that the use
13 of transaction data had been successfully used
14 in prosecutions.

15 **Q.** So if we just look at -- given that you've
16 mentioned it couple of times -- what Mr Baines
17 said. It's POL00118219. It's page 3. It's
18 a rather short witness statement, if we scroll
19 down. He says who he is in paragraph 1. He
20 says that the contents are true to the best of
21 his knowledge in 2. He explains Horizon in 3.

22 Over the page, please. He says:
23 "Before January 2003, the Post Office was
24 about 50 audit extraction requests per year
25 within the fixed price of a service and, subject

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1 Mr Jacobs and not from Mr Henry or Ms Patrick.
2 So just one set of questions from Core
3 Participants, if you just wait there.

4 **SIR WYN WILLIAMS:** Over to you, Mr Jacobs.

Questioned by MR JACOBS

6 **MR JACOBS:** Thank you, sir.

7 Mr Lenton-Smith, I represent 157

8 subpostmasters and I'm instructed by Howe+Co.

9 I want to ask you about the Post Office's
10 objectives in relation to Mr Coyne's evidence.
11 Now, you were taken to -- we don't need to turn
12 it up again -- a letter from Jan Holmes to you,
13 dated 7 June 2004, in which Jan Holmes told you
14 what Mandy Talbot's view was, that the Post
15 Office view was the safest thing to do was to
16 throw money at it get a confidentiality
17 agreement and "how much to go away and keep your
18 mouth shut"; do you recall that?

19 **A.** Mm-hm.

20 **Q.** When you were asked about it, you said that you
21 didn't know what Post Office's objectives were.
22 Can I ask you to look at a document which you've
23 already seen today and which Ms Helliwell looked
24 at earlier on. It's POL00095375.

25 If we can go down to the bottom of the first
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1 page, and here we have Mr Baines saying to you,
2 in relation to the expert opinion:

3 "As I'm sure you will understand, Post
4 Office is concerned by these findings, not only
5 in relation to this particular case, but also
6 because of any precedent that this may set and
7 that may be used by Post Office's agents
8 [subpostmasters] to support claims that the
9 Horizon System is causing errors in their branch
10 accounts."

11 So is it right to say that Mr Baines, in
12 this letter, was telling you that Post Office's
13 objectives in relation to Mr Coyne's evidence
14 was to keep this away from the "gaggle", as they
15 were subsequently described, of subpostmasters,
16 so that they wouldn't be able to defend
17 themselves against allegations that concern
18 alleged shortfalls generated by Horizon?

19 **A.** Can you go back to the previous page, please?

20 **Q.** Yes. The highlighted section:

21 "... Post Office is concerned by these
22 findings, not only in relation to this
23 particular case, but also because of any
24 precedent that this may set ..."

25 **A.** So this is in the absence of transaction data,
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1 Holmes' draft response to you, I believe, in
2 respect of the letter that Keith Baines wrote to
3 you that we just looked at. We see some more
4 about precedent here but it's more specific. So
5 it says:

6 "POL are concerned that the Expert's opinion
7 (that the system was at fault) might set
8 a precedent against future ... prosecutions."

9 So it's quite clear, isn't it, that both
10 Mr Holmes and you knew what Post Office's
11 objections were, or objectives amounted to, in
12 respect of the expert report? It didn't want
13 this being used by subpostmasters in relation to
14 defending themselves in prosecutions?

15 **A.** So the expert report as it stood, which he
16 hasn't changed and which we were unable to
17 persuade Post Office to provide him more data,
18 was the *de facto* basis that would be set as the
19 precedent --

20 **Q.** Do you accept --

21 **A.** -- or a precedent.

22 **Q.** -- that is a very serious issue. As Mr Beer has
23 said: people were being prosecuted --

24 **A.** I understand.

25 **Q.** -- they were being put in prison, were not
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1 that was thought that would have substantiated
2 the Post Office's position and, in the absence
3 of that, we have a report which Post Office
4 subsequently found unacceptable but that, in
5 itself, as it is published, would cause
6 a precedent to be set, in other words reliance
7 on an expert's --

8 **Q.** Yes, we heard evidence from -- and I don't know
9 if you heard, but Mr Coyne give evidence
10 yesterday. He stood by his report. He stood by
11 his report at the time. There was a report
12 which the Post Office didn't accept.

13 **A.** Yes.

14 **Q.** But it was capable of being used by
15 subpostmasters to defend themselves against the
16 Post Office when the Post Office bought actions
17 in relation to shortfalls; that's right, isn't
18 it?

19 **A.** I would have thought so, if it was in the public
20 domain, yes.

21 **Q.** Then if we could also turn to FUJ00121486.
22 We'll wait for it to come up on the screen. If
23 we can go to the section that says,
24 "Background", and it's right at the bottom
25 there, it's the last paragraph. So this is Jan
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1 seeing their children. You were asked earlier
2 on in your evidence today why didn't Fujitsu
3 have a rethink, given that, at least on one
4 view, what the expert was saying was right, and
5 we know, don't we, that what he said about blue
6 screening, money vanishing on reboot, that that
7 all came to pass. We know that it ultimately
8 was right?

9 **A.** Yes, but we're talking about at the time, so
10 this is -- we're talking about 2004.

11 **Q.** Yeah.

12 **A.** What came to pass in the future, we obviously
13 weren't aware of. The fact that there were
14 technical issues around -- I can't comment
15 because I wasn't a technical person but I think
16 in the statement Jan Holmes has made the point
17 that when -- as the technical issues arose, they
18 were being dealt with through the Fujitsu
19 support system.

20 **Q.** But don't you think that it would have been best
21 practice, instead of calling the expert a "git",
22 which Mr Holmes did, instead of trying to
23 dismiss what he'd said, to have a review based
24 on the potential at the time that this, that
25 what Mr Coyne was saying could be right, as it
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1 subsequently turned out to be?

2 **A.** So I'm not aware of what activities took place
3 within the service function to take on board
4 those comments. You talked about the blue
5 screens, which I think they said were being
6 rectified or any other issues that had been
7 raised in his report, so that that would be
8 a one for record of the service function and/or
9 software development to come up with or may have
10 dealt with. But, at a commercial level, these
11 matters would not arise because they were not of
12 a commercial issue.

13 **Q.** Why didn't you, just as a matter of good
14 practice, have a rethink about the Horizon
15 System as a result of the issues that the expert
16 had raised?

17 **A.** I don't know that we didn't.

18 **Q.** Well, you said you didn't?

19 **A.** I don't know. I didn't personally. I'm talking
20 about me personally. I didn't. But I'm not
21 sure whether the functions that were --
22 surrounded the system did.

23 **Q.** Well, we know that in September 2004 there was
24 a review of the Cleveleys case and that there
25 were no recommendations made. So nothing was
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1 failing to respond appropriately to Mr Coyne
2 were complicit in this cover-up, in failing to
3 undertake a review and in seeking to dismiss,
4 rather than investigate?

5 **A.** As I said, I don't know whether we didn't do
6 that. I mean there may not have been
7 recommendations in the internal report on the
8 Cleveleys case but I can't comment, and we
9 have -- but we have described that, as a result
10 of particular issues, they were pushed through
11 the first, second, third and fourth line of
12 support issues and to rectify some of it -- to
13 rectify some of the issues. So I can't say that
14 they were not acted upon. There's no evidence
15 to say that they were not acted upon.

16 **MR JACOBS:** Well, thank you, I might just have some
17 further questions for you.
18 No, I haven't. That all I have for you.
19 Thank you.

20 **THE WITNESS:** Thank you.

21 **Questioned by SIR WYN WILLIAMS**

22 **SIR WYN WILLIAMS:** The impression I get,
23 Mr Lenton-Smith, is that you consider -- and for
24 all I know at the moment, you may be right --
25 that it would not have been for you personally
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1 done; is that fair?

2 **A.** On the basis that nothing was -- happened --
3 nothing -- no recommendations came out of the
4 Cleveleys report, potentially.

5 **Q.** My clients take the view that, when one looks at
6 the views of Mandy Talbot, when one looks at the
7 correspondence that we've looked at between
8 Mr Holmes and yourself, it's quite clear that
9 Post Office were seeking to cover up their own
10 expert opinion that showed that Horizon was
11 defective because they didn't want that to get
12 out to subpostmasters. Do you accept that's
13 a fair summary of what Post Office were doing at
14 the time?

15 **A.** He didn't conclude that the system was
16 defective. He construed that it might be
17 defective but he didn't have proof to say that
18 it was defective. But -- sorry, just say your
19 question again, sorry?

20 **Q.** My question to you is that Post Office were
21 seeking to cover up the expert report because
22 they didn't want subpostmasters to find out what
23 Mr Coyne had found.

24 **A.** I can't really comment on that.

25 **Q.** I have to suggest to you that your actions in
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1 or your department to take forward
2 an investigation of the extent to which
3 Mr Coyne's opinions might be valid, all right?

4 **A.** Yes.

5 **SIR WYN WILLIAMS:** Tell me whether you think there
6 was a department or a person within Fujitsu who
7 would have been charged to take forward such
8 an investigation if it was carried out? In
9 other words, can you point me in the right
10 direction so that I can investigate whether the
11 appropriate person in Fujitsu carried out any
12 investigation?

13 **A.** So I think within the service infrastructure,
14 service department, that managed the first,
15 second and third line support functions, the
16 Service Director may well have -- is possibly
17 the person to whom they -- those corrective
18 measures should have been applied. Any software
19 development, bugs, issues, which I'm sure you've
20 been through, would fall to the software
21 development, Software Services Director.

22 **SIR WYN WILLIAMS:** So I don't want to make this too
23 simplistic but through Mr Holmes -- and
24 Mr Holmes is a technical man, isn't he?

25 **A.** Yes.
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1 **SIR WYN WILLIAMS:** Through Mr Holmes, if Fujitsu
 2 wanted to, they would be able to ascertain
 3 sufficient information about the expert's
 4 opinion and then, through Mr Holmes, engage the
 5 right people in Fujitsu to carry out such
 6 investigation as was necessary, in order to
 7 validate or disprove what the expert had been
 8 saying.
 9 **A.** Yes.
 10 **Q.** So I understand it could have been done and
 11 I understand your evidence to be that you don't
 12 know if it was done?
 13 **A.** That's correct.
 14 **SIR WYN WILLIAMS:** Right. Thank you very much.
 15 Thanks for coming to give evidence to me,
 16 and thanks for the witness statement.
 17 **THE WITNESS:** Thank you.
 18 **MR BEER:** Thank you, sir, that's all of our evidence
 19 today. We resume I think at 10.00 tomorrow.
 20 **SIR WYN WILLIAMS:** You gave me a shock then,
 21 Mr Beer.
 22 **MR BEER:** It would have had given Mr Blake a shock
 23 too because he's asking the questions tomorrow.
 24 **SIR WYN WILLIAMS:** So it's just Mr Holmes tomorrow,
 25 is it?

1 **MR BEER:** It is, yes, thank you.
 2 **SIR WYN WILLIAMS:** All right, 10.00 tomorrow.
 3 (4.10 pm)
 4 (The hearing adjourned until 10.00 am
 5 the following day)
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1 **I N D E X**

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