

Tuesday, 19 September 2023

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(9.06 pm)

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

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

**MR BEER:** Sir, before we move to call Helen Rose, can I say something briefly about ongoing disclosure?

**SIR WYN WILLIAMS:** Of course.

**MR BEER:** As everyone will know, following the hearing held on 5 September this year, you decided that the Inquiry could commence hearing from Phase 4 witnesses today and you subsequently issued a statement giving further directions. As has been made clear on previous occasions when the Inquiry has addressing the issue of late disclosure, all of those interested in the work of the Inquiry, including but not limited to witnesses and Core Participants, should understand that the fact that the Inquiry has decided to continue to hear evidence does not mean that the witnesses from whom evidence is about to be taken will be giving evidence just once.

The Inquiry will not hesitate to request

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of the Inquiry.

Many but not all of these documents have been provided in response to the three disclosure failings that you identified following the disclosure hearing held on 4 July, namely search terms, family documents and deduplication.

These documents relate to a range of requests made by the Inquiry to the Post Office dating back to 8 October 2021 and running up until 5 June 2023.

It follows from what I've said that a high number of potentially relevant documents have been disclosed in the recent past by the Post Office and many of them are presently being processed by the Inquiry, albeit a large number of them appear to be duplicates of material already disclosed to the Inquiry.

As I've said, no one should be surprised if witnesses have to be re-called as a consequence of this and other disclosure issues.

Sir, you're still on mute.

**SIR WYN WILLIAMS:** Thank you, Mr Beer. I don't propose to add to what you've said but I certainly endorse it.

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a further witness statement or statements from witnesses and call witnesses back to give evidence in the event that sufficiently relevant material is either disclosed before the witness gives evidence but the Inquiry has not had the opportunity to process it or such evidence is disclosed after a witness gives evidence.

This is not only to ensure that all sufficiently relevant material is put to witnesses but also in fairness to witnesses, so that they have the opportunity to address all sufficiently relevant material.

To put into context what I've just said, I should say that since 3 July this year, so just before the first disclosure hearing, the Post Office has disclosed approximately 23,000 potentially relevant documents to the Inquiry. This included disclosures right up until the end of last week with 1,500 documents coming in on Thursday and 1,500 documents coming in on Friday of last week.

Of those approximately 23,000 documents, on the basis of how the Post Office has categorised them when disclosing them, approximately 15,200 are said by the Post Office to relate to Phase 4

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**MR BEER:** Thank you. Just so everyone knows, we propose to sit until 1.30 pm today, rather than the 2.00 pm that was advertised.

**SIR WYN WILLIAMS:** That, I have to confess, is due to my personal circumstances so I apologise for that.

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

Might I therefore call -- and she's giving evidence remotely -- Helen Rose, please.

**SIR WYN WILLIAMS:** Of course, yes.

**HELEN ROSE (affirmed)**

**Questioned by MR BEER**

**MR BEER:** Thank you very much. Mrs Rose, my name is Jason Beer, as you know, and I ask questions on behalf of the Inquiry. Can you give us your full name, please.

**A.** Helen Rose.

**Q.** Thank you for attending remotely to assist the Inquiry in its work and for previously providing a witness statement to the Inquiry. You should have in front of you a hard copy of that witness statement. It's in your name and dated 10 May 2023. If you turn to the last page of it, which is page 9, there's a signature. Is that your signature?

4

1 A. It is, yes.  
 2 Q. Are the contents of that statement true to the  
 3 best of your knowledge and belief?  
 4 A. Yes.  
 5 Q. For the purposes of the transcript, the URN is  
 6 WITN00790100. That need not be displayed.  
 7 Can I start by asking you some questions  
 8 about your career qualifications and experience.  
 9 You joined the Post Office in 1997; is that  
 10 right?  
 11 A. Correct, yes.  
 12 Q. Did you have any professional qualifications  
 13 prior to joining the Post Office?  
 14 A. No.  
 15 Q. Having joined in 1997, you worked in what you  
 16 describe in your witness statement as head  
 17 office branches. Can you describe what a head  
 18 office branch is, please?  
 19 A. It was the Post Office Counters but it was in  
 20 main branches, the Crown Offices.  
 21 Q. So what we know as Crown Office branches?  
 22 A. Correct, yeah.  
 23 Q. Whereabouts were you based?  
 24 A. I was based at Huddersfield.  
 25 Q. What responsibilities did your role entail when

5

1 remained an auditor for five years until 2004;  
 2 is that right?  
 3 A. That's correct, yeah.  
 4 Q. Did you have any qualifications to be  
 5 an auditor?  
 6 A. No.  
 7 Q. Did you receive any training to be an auditor?  
 8 A. I believe it was on-the-job training.  
 9 Q. Did you have any training on the operation of  
 10 the Horizon System?  
 11 A. I can't remember whether we did any courses or  
 12 whether it was, again, on-the-job training with  
 13 the system.  
 14 Q. Did any on-the-job training as an auditor, or  
 15 indeed later as an investigator, include any  
 16 discussion of any bugs, errors or defects in the  
 17 Horizon System?  
 18 A. Not that I can remember, no.  
 19 Q. Did your training as an auditor on the job or  
 20 later as an investigator include any discussion  
 21 about the role of Fujitsu in providing support  
 22 for the correction of any bugs, errors or  
 23 defects in the system?  
 24 A. Not that I can recall, no.  
 25 Q. When you were an auditor, where were you based?

7

1 you were working in the Crown Office branch?  
 2 A. Serving customers, dealing -- I think it did  
 3 eventually go on to Horizon. I can't confirm if  
 4 it was Horizon when I started at the Crown  
 5 Office.  
 6 Q. Okay, so you were working on the counters,  
 7 essentially?  
 8 A. Correct.  
 9 Q. I think you remained there until 1999 when you  
 10 became an auditor; is that right?  
 11 A. Correct, yes.  
 12 Q. If that chronology is right, I think it follows  
 13 that you wouldn't have worked with Horizon  
 14 before moving to become an auditor because it  
 15 hadn't --  
 16 A. No.  
 17 Q. -- been rolled out by 1999?  
 18 A. No.  
 19 Q. What if any knowledge did you have of the  
 20 Horizon System when you worked on the counters  
 21 in the Huddersfield Crown Office?  
 22 A. I can't remember the system back then. It was  
 23 a computerised system but I couldn't tell you  
 24 which it was.  
 25 Q. In any event, you became an auditor in 1999 and

6

1 A. Leeds.  
 2 Q. Did you have a geographical area of coverage?  
 3 A. Yes.  
 4 Q. What was that area?  
 5 A. From memory, it was the northeast, so I seem to  
 6 think it was from Lincoln, potentially up to the  
 7 Scottish border and across to the east side of  
 8 Manchester.  
 9 Q. Thank you. What did your responsibilities  
 10 entail when you were an auditor for those five  
 11 years?  
 12 A. It would have been -- given a list of offices to  
 13 visit and confirm cash and stock at branches.  
 14 Q. What do you mean by confirm cash and stock at  
 15 branches?  
 16 A. From memory, attending a branch and just  
 17 ensuring the assets were on site.  
 18 Q. So was it essentially a counting function?  
 19 A. Yes, basically, yes.  
 20 Q. If there were discrepancies, did your role as  
 21 an auditor involve investigating why the  
 22 discrepancies had arisen?  
 23 A. Not that I can recall. If it was clear that you  
 24 could see where the error was made, I would  
 25 obviously report that. But no, no, it would be

8

1 passed up the line.

2 **Q.** Did your role as an auditor involve

3 consideration of whether the Horizon System was

4 responsible for any discrepancies in accounts or

5 figures?

6 **A.** No, I wouldn't have thought so, no.

7 **Q.** In the witness statement you gave in the Lee

8 Castleton trial -- I'm not going to turn it up

9 at the moment, I'm just going to give the

10 reference, it's POL00082945, page 2,

11 paragraph 4 -- you said that you carried out at

12 least one audit every day, sometimes two or

13 three audits a day, sometimes four, and that, in

14 this five-year period, you completed well over

15 1,400 audits. Is that accurate?

16 **A.** From memory, yes.

17 **Q.** In those 1,400 audits, what audit information

18 held by Fujitsu would you have ordinarily

19 accessed when carrying out your audit?

20 **A.** As an auditor, none.

21 **Q.** To whom did you report at this time?

22 **A.** I can't remember my first line manager.

23 I believe my line manager at some point in

24 auditing was John Jenkinson but, sorry, I can't

25 remember any other names.

9

1 **A.** I can't remember whether there was a system that

2 we could download it on. We had to go in and

3 look at the actual -- when you visited the

4 office. Sorry, I haven't got very much

5 recollection from then.

6 **Q.** By this time, had you received any specialist

7 training in the operation of the Horizon System?

8 **A.** Not that I can recall, no.

9 **Q.** Had you received any training in the operation

10 of the Horizon System by this time?

11 **A.** Other than gaining experience in the years of

12 auditing and not that I can recall, no.

13 **Q.** Between 2006 and 2016, you say in your statement

14 that you undertook a range of analytical roles;

15 is that right?

16 **A.** Correct, yes.

17 **Q.** Until you left the Post Office in 2016?

18 **A.** Yes.

19 **Q.** I wonder whether we could look at some

20 documents, please, to try to jog your memory as

21 to what some of those analytical roles were.

22 Can we start, please, and it'll come up on the

23 screen in front of you, Mrs Rose, POL00104906.

24 Can you see this is a document entitled

25 "Fraud & Conformance Team, Team Leader

11

1 **Q.** That's all right. How many people were in your

2 audit team?

3 **A.** Oh, wow. There were a few different audit

4 teams. I'm going to hazard a guess at six,

5 I think, but that probably changed on and off.

6 **Q.** Between 2004 -- so for two years -- and 2006,

7 you became an investigator in the Security team;

8 is that right?

9 **A.** That's right yes.

10 **Q.** Where were you based?

11 **A.** Sheffield.

12 **Q.** What responsibilities did your role as

13 an investigator within the Security team entail?

14 **A.** From memory, it would have been -- you would

15 have been a case to look into to try to

16 understand what had happened in that case.

17 **Q.** How would you understand what had happened in

18 that case?

19 **A.** That would have been more looking at

20 transactions, findings, results from previous

21 audits. I'm sorry, I don't remember an awful

22 lot in that role.

23 **Q.** When you say that it would involve looking at

24 transactions, how would you look at

25 transactions?

10

1 Handover", 3 March 2012?

2 **A.** Mm-hm.

3 **Q.** So this would have been well into your role as

4 an analyst or undertaking analytical work in the

5 Security team, yes?

6 **A.** Yes.

7 **Q.** Can you remember what the Fraud and Conformance

8 team was?

9 **A.** Not specifically, no. I know it was a team in

10 Chesterfield but other than that, no.

11 **Q.** Were you a part of it?

12 **A.** Sorry?

13 **Q.** Were you a part of it, the Fraud and Conformance

14 team?

15 **A.** I don't think so.

16 **Q.** Can we turn to page 3, please. Looking at "Team

17 Purpose":

18 "Since 2008 additional agency resource has

19 been used on the team to enable detailed Branch

20 Investigation. This resource has been utilised

21 to check branch accounting activity and has been

22 used to identify new fraudulent indicators. It

23 has also been used to support elements of the

24 Santander contract with POL to address

25 non-conformance and identify fraud relating to

12

1 Green giro transactions and despatch."  
 2 Was what is described there part of your  
 3 role?  
 4 **A.** Prior to this, yes, but I can't remember the  
 5 details, I'm sorry.  
 6 **Q.** When you say "prior to this", prior to March  
 7 2012? What do you mean, "prior to this"?  
 8 **A.** Prior to that date. I used to look at data  
 9 at -- I can't remember which data -- to identify  
 10 any fraudulent indicators or compliance that --  
 11 I'm sorry, I don't have an awful lot of memory  
 12 on that.  
 13 **Q.** Can we look at page 9 of the document, please.  
 14 There's a table that lasts in summary form  
 15 a couple of pages and then in many more pages in  
 16 detail, called "Fraud Indicators Summary"?  
 17 **A.** Mm-hm.  
 18 **Q.** You'll see down the left-hand side there is  
 19 a list of indicators, cash, scratchcard stock,  
 20 or cheques, a level of risk, and then a method  
 21 of detection?  
 22 **A.** Yes.  
 23 **Q.** You're, for the first and third on there, cash  
 24 and cheques, said to be a useful contact. Can  
 25 you see that?

13

1 **A.** I honestly couldn't remember. Advice on,  
 2 I would guess, where to look for things. But  
 3 I can't remember the systems, I'm sorry.  
 4 **Q.** Can we turn to page 23, please. There's a list  
 5 of "Key Contacts from around the business"  
 6 within this document and if we see, about seven  
 7 or eight lines in, your name I see mentioned and  
 8 your role is described as "Crime Risk"?  
 9 **A.** It is.  
 10 **Q.** Did your role involve investigating branches to  
 11 look for evidence of criminal activity such as  
 12 theft or false accounting?  
 13 **A.** It would have been to identify anomalous  
 14 behaviour, which could be theft, false  
 15 accounting, compliance, human error, various  
 16 things.  
 17 **Q.** When performing that role, did you consider  
 18 whether the Horizon System was at fault, that  
 19 that was amongst the list of potential problems  
 20 that you ought to encourage people to look at or  
 21 you look at yourself?  
 22 **A.** At the time, I don't recall that coming to  
 23 light, no.  
 24 **Q.** When you were undertaking this role, crime risk,  
 25 did you review what's known as ARQ data?

15

1 **A.** I can, yes.  
 2 **Q.** Why were you a useful contact for the fraud  
 3 indicators of cash and cheques?  
 4 **A.** I'm presuming at the time I had quite a bit  
 5 knowledge on the data and what it was telling  
 6 people.  
 7 **Q.** What kind of people contacted you about these  
 8 fraud indicators?  
 9 **A.** The Fraud team.  
 10 **Q.** Okay, so they were based in Chesterfield and you  
 11 were in Sheffield; is this right?  
 12 **A.** No, I worked -- I was in Sheffield when I did  
 13 the investigation role. When I did the  
 14 analytical role I was based -- I think initially  
 15 I was based home working and then it went into  
 16 Manchester but I did do quite a bit of work in  
 17 Chesterfield.  
 18 **Q.** Okay. Anyway, members of the Fraud and  
 19 Conformance team, of which you were not a part,  
 20 contacted you?  
 21 **A.** Yes.  
 22 **Q.** Why would you be contacted?  
 23 **A.** I can only think that at the time I had  
 24 knowledge to assist any questions.  
 25 **Q.** What kind of advice would you give?

14

1 **A.** Looking at the documents I've been sent over,  
 2 yes, I believe I could have done. I don't  
 3 recall any but potentially could have done.  
 4 **Q.** What role did you play in determining whether  
 5 branches were to be investigated or not?  
 6 **A.** If my memory serves me right, if anything  
 7 highlighted outside the normal -- and I can't  
 8 tell you what the normal is without seeing the  
 9 data -- I would have probably passed that on to  
 10 somebody to look into further.  
 11 **Q.** What role, if any, did you play in determining  
 12 whether branches or subpostmasters operating  
 13 branches were to be the subject of prosecutions?  
 14 **A.** None.  
 15 **Q.** Did you play any role in supporting  
 16 prosecutions?  
 17 **A.** Other than providing data for anybody that  
 18 requested it, no.  
 19 **Q.** Can we look, please, at POL00105025. This will  
 20 come up on the screen for you, Mrs Rose. This  
 21 document appears to set out the objectives of  
 22 each member of the security team for 2013 to  
 23 2014. If we go to the second page, please, we  
 24 can see that there's an index and it goes  
 25 through role by role, person by person. Can you

16

1 see that?

2 A. I can.

3 Q. That index goes on for 3 pages. You'll see

4 there that your name appears --

5 A. Mm-hm.

6 Q. -- "Helen Rose -- Security Manager, Grapevine".

7 A. Mm.

8 Q. It says go to page 44 but, in fact, that's

9 wrong. It's page 55, please, in the document.

10 We can see your role set out. It appears to be

11 one of those documents that sets out, in the

12 second box in, an objective and then a timescale

13 for achieving it in the far right-hand side; can

14 you see that?

15 A. I can, yes.

16 Q. You're described as at this time as a Security

17 Manager in Grapevine. What was Grapevine?

18 A. My memory of Grapevine would have been just

19 a Security team name.

20 Q. So it was a Security team name; is that right?

21 A. From memory, yes.

22 Q. You were the manager of it, is that right, or

23 a manager of it?

24 A. No, I think Security Manager was given to just

25 about most people within the Security team.

17

1 Q. So the money and physical possessions of the

2 Post Office?

3 A. Yes.

4 Q. Can you recall whether the map addressed any

5 risks inherent in a computer system such as

6 Horizon?

7 A. I can't recall that, no.

8 Q. Can you recall how large the Grapevine team was?

9 A. No.

10 Q. You can't remember how many people were in it?

11 A. No, I can't.

12 Q. In respect of Grapevine, how was it different

13 from any other Security team? Why was it called

14 "Grapevine"?

15 A. I don't know. My very vague memory of Grapevine

16 was more external loss, robberies, burglaries,

17 that kind of thing. I don't have any other

18 recollection of it, sorry.

19 Q. The first of your objectives is listed as:

20 "Identify potential fraud investigations and

21 trends."

22 Then skipping to the fourth one:

23 "Train and develop colleagues on the use of

24 Credence and other analytical tools."

25 Would you agree that by 2013, it appears

19

1 Q. Everyone was a manager, were they?

2 A. I think that was just the name that people

3 working in the Security team at that time were

4 given.

5 Q. You'll see in paragraph 1 -- if you just read

6 that to yourself, paragraph 1 --

7 A. Mm-hm.

8 Q. -- the third bullet point states the following

9 in relation to your role:

10 "Provide end-to-end process map for all

11 procedures to identify current known risks."

12 Do you remember that being a function of

13 yours, to produce a process map for all

14 procedures to identify known risks.

15 A. I don't recall it -- no, I can't remember it.

16 Q. Would you have produced such a map if that was

17 your objective for the following year?

18 A. I presume at the time I would have -- if that

19 was my objective, I would have produced the

20 process map, yes.

21 Q. Reading this to yourself now, such a map was to

22 identify "current known risks". What would you

23 understand "current known risks" to refer to?

24 Risks to what or to whom?

25 A. Post Office assets.

18

1 that you played a role, an important role, in

2 helping to identify potential fraud and trends?

3 A. Yes.

4 Q. Your role was an analytical one?

5 A. Correct, yes.

6 Q. You were amongst other functions helping to

7 identify trends in fraud investigation across

8 the business?

9 A. Yes.

10 Q. You were responsible for training others on

11 analytical tools to find fraud and help in the

12 investigation of fraud; is that right?

13 A. Yes.

14 Q. Your performance was being tested against those

15 tasks?

16 A. Yes.

17 Q. Can you help us as to what Credence was, please?

18 A. I believe it was a software program that you

19 could download Horizon data, but that's a very

20 vague memory of it.

21 Q. By this time, 2013 to 2014, was it the case that

22 the Post Office, in your section of it, relied

23 predominantly on Credence for the purposes of

24 investigation?

25 A. I believe it relied quite heavily on the initial

20

1 data, yes.

2 **Q.** There's no reference here or elsewhere in this  
3 document to Fujitsu audit data or ARQ data or  
4 even enhanced ARQ data. Does that reflect the  
5 fact that you would not habitually access such  
6 data in order to conduct investigations?

7 **A.** Not in that role, no.

8 **Q.** Is it also the case that, by this time,  
9 investigators didn't habitually access Fujitsu  
10 audit data or ARQ data or enhanced ARQ data in  
11 order to conduct their investigations?

12 **A.** I don't know what individual investigators would  
13 have accessed.

14 **Q.** This fourth bullet point refers to "other  
15 analytical tools". Can you recall what they  
16 were?

17 **A.** No, I can't. Sorry.

18 **Q.** Can we look, please, at POL00120956. Thank you.  
19 You'll see this is an email from Dave Posnett;  
20 do you remember him?

21 **A.** I do, yes.

22 **Q.** Do you remember what function he performed at  
23 this time, mid-2012?

24 **A.** I know from reading the document that was sent  
25 me that -- at the time I believe he was

21

1 "[I attach] the emails and attachments  
2 I sent out a month or two ago for reference."  
3 If you just control up, please, you'll see  
4 a zip file is an attachment; can you see that?

5 **A.** Mm-hm.

6 **Q.** Then carrying on reading:  
7 "The compliance checks on submitted offender  
8 interview case files will continue in 2012/2013.  
9 Associated are all the supporting documents  
10 needed, which have been amended where  
11 appropriate. I suggest that these are referred  
12 to when you have time and/or when submitting  
13 an offender interview case file. Some salient  
14 points and changes are summarised as follows, to  
15 take effect immediately where applicable."  
16 Then there's a list of bullet points in  
17 changes in case compliance; do you see that?

18 **A.** I can, yes.

19 **Q.** So, essentially, in June 2012, the contents --  
20 in July 2012, the contents of case files for  
21 offenders were going to be checked for  
22 compliance. That process was going to  
23 recommence and this was giving everyone  
24 a heads-up, yes?

25 **A.** Mm-hm, that's what it looks like.

23

1 a financial investigator but I don't know from  
2 what dates he did that.

3 **Q.** You'll see that it's dated 15 June 2012 and it's  
4 sent to a wide range of people.

5 **A.** Mm-hm.

6 **Q.** Looking at those, do they appear to be people  
7 who worked in the Security team or people who  
8 were performing analytical functions, such as  
9 you?

10 **A.** I recognise quite few of the names, yes,  
11 I believe they were a part of the Security team.

12 **Q.** So they're mainly Security team people?

13 **A.** I would say so, yes.

14 **Q.** You're amongst them; can you see that?

15 **A.** I can, yes.

16 **Q.** It's about case compliance and do you remember  
17 the topic of case compliance?

18 **A.** No.

19 **Q.** Let's read it together if we scroll down,  
20 please:  
21 "All,  
22 "Just a little reminder that the compliance  
23 on green jacket/offender files will recommence  
24 in July. I associate the emails ..."  
25 I think that means "I attach":

22

1 **Q.** I'm so sorry?

2 **A.** Yes.

3 **Q.** If we just scroll down:  
4 "This communication has been sent out now to  
5 inform you in advance of the changes in  
6 compliance and provide you with the information  
7 needed on recommencement of the compliance  
8 checks."  
9 You can see Mr Posnett's title, yes?

10 **A.** Yeah.

11 **Q.** Now, we saw that there was a zip file attached.  
12 That zip file contained various documents, some  
13 of which I would now like to look at. Before we  
14 do that, do you remember the need to comply with  
15 certain standards when submitting an offender  
16 file?

17 **A.** A vague memory of things you had to ensure were  
18 in there, but in the role I was doing at that  
19 time, I wouldn't have been completing those  
20 files.

21 **Q.** Why would you be sent the email?

22 **A.** I don't know. I'm guessing because I may have  
23 supported people with any documentation.

24 **Q.** What do you mean by you may have supported  
25 people with documentation?

24

1 A. At the time, my job would have been the  
 2 analytical side, so if people needed things  
 3 looking at, I think I probably assisted them,  
 4 but, to be honest, I can't remember any specific  
 5 ones. I would have been a support, I guess.  
 6 Q. I'm sorry, I missed that?  
 7 A. I would have been a support to them rather than  
 8 actually providing the green jackets.  
 9 Q. So you wouldn't have been sending your own green  
 10 jackets in, you might have been helping other  
 11 people in the compilation and completion of  
 12 their own?  
 13 A. Of any data that they asked for. Not the actual  
 14 completing of the green jacket, no.  
 15 Q. So presumably it was important that you had  
 16 sight of the case compliance standards so that  
 17 you could provide that support function knowing  
 18 the standards which the investigators themselves  
 19 had to comply with?  
 20 A. I would guess that's why I was copied in, yes.  
 21 Q. So, presumably at the time, I don't expect you  
 22 to remember it now, you would have read the  
 23 email and looked at the attachments?  
 24 A. Yes. I would have presumed so, yes.  
 25 Q. Can we look, please, at POL00038452. This is  
 25

1 "A single report is required in cases where  
 2 more than one suspect offender is identified  
 3 ..."  
 4 Then at the foot of the page, please, just  
 5 a bit below:  
 6 "The aim of this document is to give  
 7 guidance to Security Operations Managers and  
 8 Team Leaders on the current compliance ..."  
 9 Then over the page:  
 10 "... standards for the preparation of red  
 11 label case offender reports and discipline  
 12 reports."  
 13 Then there is set out, essentially, on  
 14 page 3 a template or an index for what the case  
 15 file should look like.  
 16 A. Mm-hm.  
 17 Q. Then if we go to page 5, please. We can see  
 18 a template, essentially, for a case file, and so  
 19 the preamble suggests that headers and footers  
 20 should read "Post Office Limited Confidential  
 21 Investigation, Legal".  
 22 Does that reflect the fact, to your  
 23 recollection, that offender reports were kept  
 24 internally and not disclosed to those who were  
 25 being investigated?  
 27

1 one of the attachments within that zip file; do  
 2 you understand?  
 3 A. Yes.  
 4 Q. If you look at page 1 that we're looking at now,  
 5 "Security Operations Team Compliance, Guide to  
 6 the Preparation and Layout of Investigation Red  
 7 Label Case Files", can you remember what a red  
 8 label case file was?  
 9 A. I'm sorry, I can't remember now, no.  
 10 Q. "Offender reports & Discipline reports". Then  
 11 page 2, we can see the purpose of the document,  
 12 essentially:  
 13 "The purpose of the Suspect Offender report  
 14 is to provide a storyboard of the events and  
 15 evidence of an investigation to the relevant  
 16 stakeholders and Post Office Limited Legal &  
 17 Compliance Team to enable a decision to be made  
 18 as to the future conduct of a case.  
 19 "This guide is produced for all Security  
 20 Operations Managers, irrespective of location  
 21 ...  
 22 "The general principle is that the  
 23 description of investigation activities should  
 24 read in the sequence they occurred ... The  
 25 following is only a guide ...  
 26

1 A. To be honest, I don't know the answer to that.  
 2 I would imagine if that was completed, the  
 3 person that you were completing it about should  
 4 know what details. They would have had to  
 5 provide the details surely.  
 6 Q. What do you mean "they would have had to provide  
 7 the details", the person being investigated?  
 8 A. Well, the date of birth, which office, what  
 9 their name was, what service, what their  
 10 National Insurance was. I would think they  
 11 would have had to have been aware.  
 12 Q. They would be aware that they were being  
 13 investigated and they could be asked "Hello,  
 14 what's your name, what's your branch code,  
 15 what's your National Insurance number", or  
 16 whatever. This is saying that the document  
 17 that's created as a result, the offender report,  
 18 is to be headed on each page, the header and  
 19 footer, "Post Office Limited Confidential  
 20 Investigation, Legal"?  
 21 A. Yes.  
 22 Q. Which tends to suggest that it's confidential,  
 23 it's for the eyes of Legal and would not be  
 24 disclosed to the suspect. Can you recall  
 25 whether that is correct or not?  
 28

1 A. I honestly have -- I couldn't answer that, I'm  
 2 sorry.  
 3 Q. Okay, well, we'll see a little bit later in this  
 4 policy document whether what I've said is  
 5 correct or not.  
 6 A. Okay.  
 7 Q. You can see on the right-hand side of the page  
 8 there that one of the things that investigators  
 9 were required to complete were identification  
 10 codes, numbers, 1 to 7 only; can you see that?  
 11 A. I can, yes.  
 12 Q. I won't ask you about that for the moment but  
 13 just remember that's there. Can we go forward  
 14 to page 10, please, and scroll down, please.  
 15 I'm so sorry, scroll up to 1.24. Thank you.  
 16 Paragraph 1.24 of the policy reads as  
 17 a heading:  
 18 "Details of failures in security,  
 19 supervision, procedures and product integrity.  
 20 "This must be a comprehensive list of all  
 21 identified failures in security, supervision,  
 22 procedures and product integrity it must be  
 23 highlighted bold in the report. Where the  
 24 Security Manager concludes that there are no  
 25 failures in security, supervision, procedures

1 A. Mm-hm. Mm-hm.  
 2 Q. Can we go, please, to page 12 of the document,  
 3 please, and look at 2.15 at the foot of the  
 4 page. A very similar paragraph to the one we've  
 5 just read:  
 6 "Details of failures in security,  
 7 supervision, procedures and product integrity.  
 8 "This must be a comprehensive list of all  
 9 failures in security, supervision, procedures  
 10 and product integrity it must be highlighted in  
 11 bold", et cetera.  
 12 So that's the same as the paragraph we've  
 13 just read, yes?  
 14 A. Yes, it is, yes.  
 15 Q. Over the page, please:  
 16 "Significant failures that may affect the  
 17 successful likelihood of any criminal action  
 18 and/or cause significant damage to the business  
 19 must be confined, solely, to the confidential  
 20 offender report. Care must be exercised when  
 21 including failures within the Discipline Report  
 22 as obviously this is disclosed to the suspect  
 23 offender and may have ramifications on both the  
 24 criminal elements of the enquiry, as well as  
 25 being potentially damaging to the reputation or

1 and product integrity a statement to this effect  
 2 should be made and highlighted in bold."  
 3 Do you remember that, that in the offender  
 4 report any of the four species of failures  
 5 listed there had to be highlighted in bold in  
 6 the report?  
 7 A. I can't remember that but at this time  
 8 I wouldn't have been doing offender reports.  
 9 Q. You would have been seeing offender reports  
 10 though, wouldn't you?  
 11 A. I would probably have been seeing them as they  
 12 came thorough. I honestly can't remember.  
 13 Sorry.  
 14 Q. Would you agree that that kind of description  
 15 there is broad enough to capture issues  
 16 discovered, any issues discovered, with the  
 17 reliability of Horizon data?  
 18 A. It should do, yes.  
 19 Q. If we go to the bottom of the page, please. We  
 20 then turn to the discipline report. Can you see  
 21 there, it says "Header and footer" -- so this is  
 22 what's to go at the top and bottom of the  
 23 document -- "Post Office Limited Confidential  
 24 Investigation, Personnel".  
 25 Yes?

1 security of the business. If you are in doubt  
 2 ... discuss with your Team Leader."  
 3 A. Mm-hm.  
 4 Q. Do you remember this difference of approach,  
 5 that if it has been discovered that there were  
 6 significant failures that affected the  
 7 likelihood of criminal proceedings or caused  
 8 damage to the reputation of the Post Office,  
 9 they weren't to be included in a document that  
 10 was disclosed to the offender but were to be  
 11 kept in the confidential offender report?  
 12 A. I don't recall that, sorry.  
 13 Q. Can you remember anything like that, that any  
 14 failures that concerned the integrity of, for  
 15 example, Horizon data or any other failures in  
 16 process that affected or might affect the  
 17 reputation of the Post Office business weren't  
 18 included in a document that would be disclosed  
 19 to the suspect, but were included in  
 20 a confidential legal report?  
 21 A. I don't recall that part but, as I say, that  
 22 probably wouldn't have been part of my role at  
 23 that time. I would have probably seen  
 24 a document like this but I can't recall  
 25 completing these reports.

1 Q. Can we look, please -- that document can come  
2 down -- at POL00115672. This is another of the  
3 attachments to the zip file.  
4 A. Mm-hm.  
5 Q. This appears to be a template drawn from the  
6 policy itself and is essentially in a Word  
7 document, either as a first page or a file front  
8 page. Do you remember the files -- the green  
9 jackets being set out in a format such as this?  
10 A. I can remember the green jackets used to be set  
11 out in a formal but I can't remember any of the  
12 documentation in it.  
13 Q. You will see this requires the person completing  
14 the file to include identification codes, can  
15 you see that on the right-hand side?  
16 A. I can, yes.  
17 Q. Can we look at POL00115674. This is another one  
18 of the attachments to the case compliance email  
19 sent to you --  
20 A. Mm-hm.  
21 Q. -- which contains a list of identification  
22 codes?  
23 A. Mm-hm.  
24 Q. So this document is an attachment to an email  
25 being sent around the Security team and you in  
33

1 the time about any of the language used in this  
2 document?  
3 A. No, not that I'm aware of.  
4 Q. Nothing strikes you about it, even now?  
5 A. No, I can't actually remember the document, but  
6 no.  
7 Q. I think that document can come down, thank you.  
8 I think you left the Post Office in 2016.  
9 A. I did.  
10 Q. Why did you leave?  
11 A. Just a career change.  
12 Q. What have you done since, if you don't mind me  
13 asking?  
14 A. Analytical and financial roles?  
15 Q. Sorry, analytical and financial roles?  
16 A. Yes.  
17 Q. Using computers?  
18 A. Yes.  
19 Q. Can I turn, then, to the claim against Lee  
20 Castleton. You were involved as an auditor of  
21 Mr Castleton's Post Office branch in Marine  
22 Drive in Bridlington in Yorkshire. You provided  
23 two witness statements in the claim brought by  
24 the Post Office against him and you gave oral  
25 evidence at his trial.

35

1 June 2012. Just read it for yourself, please.  
2 A. Okay.  
3 Q. Does anything strike you about it?  
4 A. Not really, no.  
5 Q. What was the purpose of recording the  
6 identification codes of suspects?  
7 A. I don't know. I can't answer that one.  
8 Q. Sorry?  
9 A. I don't know why I would have been asked to  
10 answer that one.  
11 Q. Can you recall any discussion as to the purpose  
12 of recording the ethnic or racial identity of  
13 a suspect?  
14 A. No.  
15 Q. Do you know what was done with the information  
16 that was recorded as to the racial or ethnic  
17 identity of a suspect?  
18 A. No, I don't, no.  
19 Q. To your knowledge, was any database kept of any  
20 racial or ethnic identity?  
21 A. Not that I'm aware of, no.  
22 Q. Have you any clue as to what was done with the  
23 information?  
24 A. No, none whatsoever.  
25 Q. To your knowledge, did anyone say anything at  
34

1 I want to ask you about each of those  
2 events, if I may.  
3 A. Yeah.  
4 Q. In a witness statement provided to the Inquiry,  
5 Mr Castleton -- I'm not going to ask for it to  
6 be turned up but it's WITN03730100 at page 2,  
7 paragraph 17 and 18 -- Mr Castleton says that  
8 he'd made 91 telephone calls over a period to  
9 a helpline and, in the course of those, had  
10 asked for an audit. Was it common for  
11 postmasters themselves to ask for an audit?  
12 A. I don't know, to be honest. As an auditor you  
13 would have been given a list of offices to  
14 visit. I wouldn't have dictated which they  
15 were.  
16 Q. Would you know whether this was a random audit,  
17 a scheduled audit or one that had been requested  
18 by the postmaster himself or herself?  
19 A. Ooh, 20 years ago, vague memory, we would have  
20 been told if it was random or scheduled but  
21 I don't know whether we would have been given  
22 details as to why we went.  
23 Q. In broad terms, what did you a typical audit  
24 process involve at a branch?  
25 A. Verifying assets, cash and stock.

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1 Q. So what would you do when you arrived?  
 2 A. Oh, vague memory, gosh, it's 20 years ago, um --  
 3 Q. But you did 1,400 of them?  
 4 A. I did, yes, but it is a long while ago. You  
 5 would introduce yourself, you would check the  
 6 cash against the system, check the stock, check  
 7 the transactions. I believe if any differences  
 8 were found the postmaster would be with you at  
 9 the time of checking it, so they could double  
 10 check your figures, make sure they agreed with  
 11 your counting and your asset verification.  
 12 Q. Thank you. Would you consider any data before  
 13 attending an audit?  
 14 A. Not that I can recall, no.  
 15 Q. Would you have accessed any call logs --  
 16 A. No.  
 17 Q. -- or any other operational records that may  
 18 record issues concerning discrepancies or  
 19 shortfalls or other problems at the branch that  
 20 you were about to audit?  
 21 A. Not that I can recall, no.  
 22 Q. So if a postmaster had been complaining for  
 23 weeks and months beforehand about discrepancies  
 24 and had been explaining problems with, for  
 25 example, the operation of the Horizon System,

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1 that subpostmasters had experienced and had  
 2 complained of when using Horizon about the  
 3 integrity of the data that it produced?  
 4 A. Not I was aware of, no.  
 5 Q. We know that you went on to provide a witness  
 6 statement in this case, in fact two witness  
 7 statements in this case. Can you recall how  
 8 many cases over time you provided witness  
 9 statements in?  
 10 A. As an auditor?  
 11 Q. Or as an investigator?  
 12 A. Oh, no, I couldn't put a figure on it. I don't  
 13 think it would be an awful lot but I couldn't  
 14 say.  
 15 Q. It was more than Mr Castleton's case?  
 16 A. I would say there was more than the one, yes.  
 17 Q. Were you provided with any advice from Post  
 18 Office Legal or any other quarter in relation to  
 19 the making of statements and the giving of  
 20 evidence in court?  
 21 A. I can't recall any.  
 22 Q. Was this the first time that you made witness  
 23 statements for an action brought against the  
 24 subpostmaster?  
 25 A. I can't answer that. I don't know. I'm sorry.

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1 you would be ignorant of that when you walked  
 2 through the door?  
 3 A. Until I got there. As far as I can remember, we  
 4 didn't do any pre-work for audits.  
 5 Q. So, in this case, does it follow that you  
 6 weren't briefed about this branch, nor the  
 7 contact that had been made by Mr Castleton about  
 8 the Marine Drive branch before your arrival?  
 9 A. No, I wouldn't have thought so.  
 10 Q. Did you speak to Cath Oglesby, Catherine  
 11 Oglesby, before the start of the audit?  
 12 A. Oh, I don't know. I don't know. Sorry --  
 13 Q. Would you typically speak to the subpostmaster's  
 14 line manager, area manager, before the start of  
 15 the audit to find out -- as had been the case  
 16 here -- that there had been extensive contact  
 17 about discrepancies and shortfalls and the  
 18 causes of them before you walked through the  
 19 door?  
 20 A. From memory, I don't think so, unless Cath had  
 21 asked for the audit, and I'd given any  
 22 information but I can't recall any.  
 23 Q. By this date -- and we're going to see that this  
 24 is 23 March 2004 -- that you conducted the  
 25 audit, had you been made aware of any issues

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1 Q. When you came to give evidence in the claim  
 2 against Mr Castleton, your evidence was based on  
 3 the typed and handwritten record of the audit  
 4 conducted on 23 March 2004 and you exhibited  
 5 this to your first witness statement in the  
 6 proceedings against Mr Castleton. Let's just  
 7 look at the witness statement first. It's  
 8 POL00082945, thank you.  
 9 We can see that this is your first witness  
 10 statement. We can see it's dated 11 January  
 11 2006 in the top right-hand corner, yes?  
 12 A. Yes.  
 13 Q. If we go to the third page, we'll see that  
 14 you've signed it. It's, in fact, obscured by  
 15 the General Restriction Order redaction but your  
 16 signature's underneath where it says, "GRO"?  
 17 A. Uh-huh.  
 18 Q. If we go back to the first page, please, at the  
 19 foot of the page, you say:  
 20 "I make this Witness Statement from facts  
 21 within my knowledge unless otherwise stated.  
 22 I have had the benefit of reading through the  
 23 audit papers. References to page numbers in  
 24 this Witness Statement are to page numbers of  
 25 exhibit 'HR1' to this Witness Statement."

40

1 A. Mm.

2 Q. In paragraph 5 you give us the date of the  
3 audit, 23 March 2004, and the fact that you  
4 attended with your colleague Chris Taylor.

5 A. Yes.

6 Q. You arrived at 8.00 am; can you see that?

7 A. I can, yes.

8 Q. Then paragraph 8, please:

9 "The handwritten notes of the audit are at  
10 pages 1 to 47 [that's of your exhibit HR1] and  
11 a typed copy of the audit is at pages 48 to 64.  
12 A copy of the conclusion of my report is at  
13 page 65."

14 Can you see that?

15 A. I can, yes.

16 Q. What you're doing here, is this right, you're  
17 referring to the record of the audit in your  
18 witness statement because it's a contemporaneous  
19 or near contemporaneous record of what happened  
20 in the audit. It's like an original note; is  
21 that right?

22 A. Yes, that's what it reads like, yes.

23 Q. Because when you were writing your witness  
24 statement here in January 2006, two years or  
25 just under two years had passed, you'd conduct

41

1 Security Inspection"; can you see that?

2 A. I can, yes.

3 Q. This and the following pages of the exhibit  
4 refer to a procedural security inspection that  
5 is carried out, contains a series of ticks and  
6 sometimes some text, and we can see the branch  
7 name of Marine Drive, Mr Castleton's name, the  
8 date of the inspection, the manager, Cath  
9 Oglesby, and the inspection of C Taylor. Does  
10 it follow from that the procedural security  
11 inspection was carried out by your colleague,  
12 Mr Taylor?

13 A. That looks like it, yes.

14 Q. Then if we go to page 18, please, and scroll  
15 down to "Cash and Stock", under "Cash and  
16 Stock", against the question "Is the safe kept  
17 locked when not in use with the key removed?",  
18 "Yes" has been ticked; can you see that?

19 A. I can, yes.

20 Q. Then can we turn to page 48, please. This is  
21 part of the typewritten section of the audit  
22 record and it's for completion by you because  
23 you were the lead inspector; is that right?

24 A. Yes.

25 Q. We can see the date on which the relevant issue

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1 hundreds of audits in the interim and presumably  
2 one blurs into the next?

3 A. 100 per cent, yes.

4 Q. So what's in the audit record is important;  
5 correct?

6 A. Correct, yes.

7 Q. Can we look at the record of the audit, please.  
8 POL00082946. Thank you. This your exhibit HR1,  
9 on the first page. Then if we skip over, we can  
10 see the handwritten stuff. If we skip to the  
11 bottom, please, keep going, and a bit more, we  
12 can see a page number in the middle at the  
13 bottom, "1"; can you see that?

14 A. I can, yes.

15 Q. As you said, pages 1 to 47 are the handwritten  
16 bit; 48 to 64 typewritten; and then an audit  
17 report at page 65 of this document.

18 A. Mm-hm.

19 Q. So these parts of the audit record are  
20 handwritten by you or your colleague Mr Taylor;  
21 is that right?

22 A. Correct, yes.

23 Q. Can we go to page 17, please. I should have  
24 started at page 16. No, 17 is correct. There's  
25 a section of the notes called "Procedural

42

1 was completed, initials, HH, that's you --  
2 I think that's your maiden name --

3 A. That was my previous name, yes.

4 Q. -- and then any remarks that were made. If you  
5 just look at "Travellers Cheques serial numbers  
6 verified on site", can you see that, it's about  
7 seven or eight down? Thank you.

8 A. Yes.

9 Q. You've said, "Not applicable". "NA", yes?

10 A. Yes.

11 Q. Is that right?

12 A. I remember the sheet, um --

13 Q. Does "NA" mean something else?

14 A. No, no. I -- you're correct, it means "not  
15 applicable" but I am presuming he didn't have  
16 travellers' cheques, looking at that, but  
17 I can't remember.

18 Q. Thank you. If we look at page 56, please. At  
19 the foot of the page the "Travellers Cheques  
20 Reconciliation"; can you see that?

21 A. I can, yes.

22 Q. That's all completely blank. Again, that would,  
23 particularly in conjunction with what you've  
24 written already, appear to suggest that there  
25 were no travellers' cheques in the branch on the

44

1 day of your audit?

2 **A.** That's what it would appear like, yes.

3 **Q.** Thank you. Then can we turn to page 63, please.

4 That's the entirety of that page displayed, and

5 I just want to look at a couple of the things

6 that are written on this page to see if they're

7 in keeping with what we've already noted. To

8 start with, what is this document?

9 **A.** I don't know, it doesn't look completed, it

10 doesn't look as though it's been finished.

11 **Q.** No, just stopping there, when you came to give

12 evidence subsequently, just cutting through

13 things, you said to the High Court that this was

14 incomplete and it was incomplete because

15 Mr Castleton was suspended and, therefore, the

16 procedural security inspection was itself not

17 continued and that may explain why this document

18 is incomplete?

19 **A.** Yes.

20 **Q.** Can you tell, though, who would have completed

21 this? Would it be you or Mr Taylor, you as the

22 lead or him as the subordinate?

23 **A.** I honestly can't remember. I would -- it would

24 be completed following all the compliance pages

25 completed but, as you say, if he was suspended

45

1 **Q.** Okay, and it says, "Travellers cheques not kept

2 in safe" --

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

4 **Q.** -- even though you've concluded, on the basis of

5 two things that you had written, that there

6 weren't any travellers' cheques on branch that

7 day?

8 **A.** No, this was just -- I read this as being just

9 a template that could apply to any branch.

10 **Q.** Okay. Can we go over to page 65, please. This

11 is essentially the audit report, as you refer to

12 it in your previous evidence to the High Court,

13 or the conclusion of the audit report, and we

14 can see that it's written by you it, is that

15 right, at the top there?

16 **A.** Yes, it looks like it, yes.

17 **Q.** It's dated 25 March 2004 and it says:

18 "An audit took place at the Marine Drive

19 Post Office on 25 March 2004."

20 That presumably is a mistake because it was

21 23 March, wasn't it?

22 **A.** Yes.

23 **Q.** Yes?

24 **A.** Yes.

25 **Q.** You led the audit and in attendance was Chris

47

1 at the time then this part wouldn't have gone

2 any further.

3 **Q.** It doesn't disclose its author and it's undated

4 and it's not addressed to anyone?

5 **A.** No, I think it was a template that you would

6 that have completed at the end of an audit,

7 where the postmaster wasn't suspended and you

8 would delete or change or add anything you

9 needed to do.

10 **Q.** Okay. So does it follow from that that the list

11 of things here might not actually be referring

12 to Mr Castleton at all?

13 **A.** I think it would refer to any branch and you

14 would delete or add where needed.

15 **Q.** Okay, and so the fact that this procedural

16 security inspection was not completed means that

17 this checklist here hasn't been crossed through

18 or added to?

19 **A.** Correct.

20 **Q.** So would that explain why it says, for example,

21 "Safe left open", where we'd seen the tick

22 previously saying that it was locked, yes?

23 **A.** Yes, that does identify both gaps and I would

24 believe that the ones that didn't apply would

25 have been removed had the audit gone to the end.

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1 Taylor:

2 "The audit commenced at 8.00 am and on our

3 arrival the subpostmaster was very pleased to

4 see us. He explained problems he had been

5 having at the office regarding balancing. His

6 problems ... started in week 43 with

7 a misbalance of [minus £4,030.97]. He was

8 adamant that no members of staff could be

9 committing theft and felt that the misbalances

10 were due to a computer problem. He had been in

11 contact with the Retail Line Manager Cath

12 Oglesby and the Horizon helpline regularly since

13 the problems began. The following table gives

14 further weeks balance declarations on the cash

15 account."

16 Scroll down, please.

17 "In week 47, £8,243.10 was put into

18 suspense. Although Horizon had been contacted

19 and the Retail Line was aware of this figure,

20 this was not authorised. In week 49, £3,509.68

21 was added to make the amount carried in the

22 suspense account £11,752.78. This was also not

23 authorised.

24 "On the completion of the audit the Retail

25 Line Manager Cath Oglesby was contacted, along

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1 with the investigation team and the Audit Line  
2 Manager. The subpostmaster was suspended  
3 pending enquiries and an interim postmaster was  
4 put in charge at the office."

5 So just picking out a few features of that,  
6 Mr Castleton was very pleased to see you, yes?

7 **A.** That's what I put, yes.

8 **Q.** Presumably that would be accurate if you wrote  
9 it?

10 **A.** I presume so, yes.

11 **Q.** He clearly identified to you that he'd been  
12 having a problem with balancing?

13 **A.** Yes, clearly, yes.

14 **Q.** He suggested to you that misbalances were due to  
15 a computer problem, yes?

16 **A.** Yes, that's what it said, yes.

17 **Q.** He told you that he'd been contact with the help  
18 line since right from the beginning and that had  
19 been in contact with his Retail Line Manager,  
20 Cath Oglesby?

21 **A.** Yes.

22 **Q.** Am I right to think that there is no  
23 investigation of what he is saying before he is  
24 suspended and an interim postmaster is brought  
25 in to run his Post Office. Instead, he's just

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1 "Well, hold on, this us a postmaster -- I don't  
2 know -- that has been working for us honestly  
3 for 20 years. We need to credit what he or she  
4 is saying. We need to conduct an investigation  
5 into whether what he says or she says is  
6 correct. Let's investigate whether or not what  
7 he or she says is accurate", and they weren't  
8 suspended, they were allowed to carry on  
9 working?

10 **A.** I don't recall any. I wouldn't have thought  
11 a Retail Line Manager would discuss that with  
12 an auditor. I think an auditor just verified  
13 the things -- you know, the cash and the stock  
14 are discrepancies and passed it over. So you  
15 wouldn't particularly have been involved in that  
16 side.

17 **Q.** Did you ever hear, because you were standing  
18 there in branch, it coming back from the Line  
19 Manager, "Let's not suspend them, let's  
20 investigate the merits of what they say"?

21 **A.** No, I can't recall any.

22 **Q.** Thank you very much. I wonder whether we could  
23 take the morning break and perhaps 20 minutes,  
24 sir.

25 **SIR WYN WILLIAMS:** By all means, Mr Beer. So that

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1 suspended on the spot there and then?

2 **A.** I -- as an auditor, you would pass that over to  
3 the Retail Line Manager to make that decision.

4 **Q.** But it all happened quite quickly on the day,  
5 did it?

6 **A.** I believe it did, yes.

7 **Q.** Is that typical of how things worked at this  
8 time? It didn't matter if the subpostmaster had  
9 asked for the audit it didn't matter if the  
10 subpostmaster had been making complaints for  
11 weeks and months to the helpline or to his  
12 manager of a computer problem; if there was  
13 a shortfall that was not authorised, he was  
14 suspended?

15 **A.** That would have been the decision of the Retail  
16 Line Manager.

17 **Q.** No matter whose decision it was, that is what  
18 would have happened, is that right, they were  
19 just suspended?

20 **A.** I don't know whether that happened on every  
21 occasion, I guess it would depend on each case.

22 **Q.** Well, were you ever in, amongst the 1,400 audits  
23 that you conducted, a situation where  
24 a postmaster was saying, "It's not me, it's the  
25 computer system", and the Line Manager says,

50

1 would bring us back at what time, please, by  
2 your --

3 **MR BEER:** 10.40.

4 **SIR WYN WILLIAMS:** 10.40. All right. We'll break  
5 now for 20 minutes and come back at 10.40.

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

7 **THE WITNESS:** Thank you.

8 **(10.20 am)**

**(A short break)**

9  
10 **(10.40 am)**

11 **MR BEER:** Good morning, sir, and Mrs Rose, can you  
12 both see and hear me?

13 **SIR WYN WILLIAMS:** I can.

14 **THE WITNESS:** Yes.

15 **MR BEER:** Thank you very much, Mrs Rose. We just  
16 looked at the record of the audit conducted by  
17 you and your colleague Mr Taylor on 23 March  
18 2004. I want to turn to consider the witness  
19 statements that you filed in the civil  
20 proceedings brought against Mr Castleton, what  
21 was included in them and what changed between  
22 the two witness statements. Can we go back to  
23 your first witness statement, please,  
24 POL00082945?

25 So you remember this is your first witness

52

1 statement, dated 11 January 2006. We've been  
 2 through the bits of it which say, "I rely on the  
 3 audit record", yes?  
 4 **A.** Yes.  
 5 **Q.** We left off on page 2 at paragraph 8, where you  
 6 refer us to the handwritten and typewritten  
 7 sections of the audit report and the conclusion  
 8 of the audit report, all of which we've looked  
 9 at, and then at paragraph 9 you say:  
 10 "As part of an audit, we have to complete  
 11 a procedural security inspection. This was  
 12 carried out by my colleague Chris Taylor.  
 13 A typed copy of the procedural and security  
 14 inspection is at page 63 [remember, we looked at  
 15 that before the break]. The inspection revealed  
 16 that the safe was left open, the safe keys were  
 17 left in the safe door and that it was not  
 18 secured, that cash and stock were not secured  
 19 during lunchtime if the subpostmaster was not on  
 20 the premises, that Travellers Cheques were not  
 21 kept in the safe and Foreign Currency was not  
 22 held securely, that standard procedures for  
 23 adjusting losses and gains were not adhered to  
 24 (because the losses were unauthorised) and  
 25 personal cheques on hand had been incorrectly

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1 **Q.** Well, it's not accurate, is it, according to  
 2 what you've told us already?  
 3 **A.** It doesn't look to be, does it? No.  
 4 **Q.** So why is inaccurate evidence being given to the  
 5 High Court?  
 6 **A.** I can't recall. I don't know.  
 7 **Q.** You're telling the court in this paragraph here,  
 8 aren't you, "This man, Mr Castleton, was sloppy  
 9 and slapdash. There are things that we saw when  
 10 we audited him that could well explain the  
 11 missing money". that's what this paragraph is  
 12 for, isn't it?  
 13 **A.** That's what it kind of indicates, yes, but, as  
 14 I say, I don't know why that wasn't picked up at  
 15 the time of the hearing.  
 16 **Q.** Well, we're going to see in a moment that you  
 17 did something about it --  
 18 **A.** Oh, right, okay.  
 19 **Q.** -- between the first and second witness  
 20 statement. But what I'm asking at the moment is  
 21 can you recall how it is that this information  
 22 was included in your first witness statement  
 23 when it's not accurate?  
 24 **A.** I can't recall that.  
 25 **Q.** Can we turn, please, to POL00081700\_208, thank

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1 treated."  
 2 **A.** Mm-hm.  
 3 **Q.** Those are the standard things on the checklist,  
 4 aren't they?  
 5 **A.** They are, yes.  
 6 **Q.** Which didn't necessarily apply to Mr Castleton,  
 7 did they?  
 8 **A.** On reading that, I would have said not. I can't  
 9 remember writing this, so ...  
 10 **Q.** That's what I want to ask about.  
 11 **A.** Yeah.  
 12 **Q.** Given that you told us already that page 63 is  
 13 a template and hadn't been --  
 14 **A.** From memory, yes, yes it was.  
 15 **Q.** -- ticked or crossed or deleted or added to, why  
 16 is it, in a witness statement to the court,  
 17 you're telling the court that all of those  
 18 failures applied in the case of this audit?  
 19 **A.** That's what it looks like, yes.  
 20 **Q.** I'm sorry?  
 21 **A.** I said that's what it looks like, but I --  
 22 **Q.** I'm asking why.  
 23 **A.** Why it's in there?  
 24 **Q.** Yes.  
 25 **A.** I can't remember.

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1 you. This is a record of an email exchange  
 2 between you and Stephen Dilley, who is the Post  
 3 Office's solicitor, on 15 September, or 14 and  
 4 15 September 2006. So it's about eight months  
 5 after the first witness statement was filed,  
 6 okay?  
 7 **A.** Right.  
 8 **Q.** If we go to the foot of the page, please, can  
 9 you see there's an email, it's slightly hard to  
 10 read, but it's from Stephen Dilley, to you and  
 11 some other people?  
 12 **A.** Mm-hm.  
 13 **Q.** It's dated 14 September 2006, and the subject is  
 14 "Second witness statement of Helen Rose: *Post*  
 15 *Office v Castleton*"?  
 16 **A.** Mm-hm.  
 17 **Q.** Mr Dilley says:  
 18 "I refer to our recent email exchange and  
 19 attach a second witness statement for your  
 20 approval, together with just those exhibits that  
 21 you may not have seen previously.  
 22 "Please can you read the statement very  
 23 carefully and make sure you are 100% happy with  
 24 it, especially paragraph 12. Please could you  
 25 also answer my question in bold italics in

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1 paragraph 12.  
 2 "Once I hear back from you, I'll draw up  
 3 a final version and send it back to you for  
 4 signature."  
 5 Then back to page 1, please. You say:  
 6 "Stephen,  
 7 "I have read the statement ..."  
 8 Then if we go forwards to the fourth  
 9 paragraph, you say:  
 10 "The security inspection was started but  
 11 from what I can remember not completed. The  
 12 reason for this being that normal audits would  
 13 require many compliance tests completing,  
 14 including the security compliance. However when  
 15 a postmaster is suspended for whatever reason  
 16 then compliance tests are not completed. This  
 17 would have been started as a matter of routine  
 18 until we were notified that Mr Castleton was to  
 19 be suspended."  
 20 **A.** Mm-hm.  
 21 **Q.** Yes? So you're telling him there that the stuff  
 22 that's in the witness statement about security  
 23 inspection, it was a security inspection that  
 24 was started but not completed, okay?  
 25 **A.** Yeah.

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1 **A.** Yes.  
 2 **Q.** Then lastly can we look at POL00071196. You'll  
 3 see this is your second witness statement.  
 4 **A.** Mm-hm.  
 5 **Q.** It's dated 4 October 2006, so the day after that  
 6 telephone call. If we look, please, at the  
 7 second page, at paragraph 8, we can see that  
 8 paragraph 7 was not dissimilar to your first  
 9 witness statement about exhibiting the audit  
 10 report, essentially, and then replacing the list  
 11 of failures in the security audit, the check box  
 12 on page 63, is a new paragraph 8:  
 13 "As part of a normal audit, we have to  
 14 complete a procedural security inspection. This  
 15 was initiated by my colleague Chris Taylor.  
 16 When a postmaster is suspended then any  
 17 remaining compliance tests are not completed,  
 18 because of the large number of compliance tests  
 19 ... that have to be complete for each audit.  
 20 Accordingly, although the procedural security  
 21 inspection was started as a matter of routine,  
 22 I do not recall it being completed because  
 23 Mr Castleton was suspended prior to its  
 24 completion and it then became irrelevant."  
 25 Yes?

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1 **Q.** Then we follow that up with a call a couple of  
 2 weeks later, can we look at POL00069514. This  
 3 is a typewritten telephone attendance note,  
 4 completed, I think, by Mr Dilley and you'll see  
 5 it's dated 3 October 2006. He records:  
 6 "I had a telephone conversation with Helen  
 7 Rose (her call) coming back to me on a voicemail  
 8 I had left with her. She had read the latest  
 9 version of the statement and thought that it was  
 10 better in terms of the balanced snapshots.  
 11 "However she wanted to make a further change  
 12 to paragraph 8. She said as soon as the  
 13 subpostmaster was suspended, the compliance test  
 14 then became irrelevant. Had it been a normal  
 15 audit, ie had Castleton been carrying on, the  
 16 test would have been complete and the postmaster  
 17 would have been told to get his act together,  
 18 but she wanted to emphasise that the compliance  
 19 test failure weren't themselves the reason he  
 20 was dismissed. He was dismissed because of the  
 21 loss of stock."  
 22 Okay?  
 23 **A.** (*Unclear*)  
 24 **Q.** That is building on what you had said in the  
 25 email exchange essentially, yes?

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1 **A.** Mm-hm, yeah.  
 2 **Q.** So it follows, does it, that everything that had  
 3 been said in the first witness statement, in  
 4 that paragraph 9, about failures in security  
 5 that was, in fact, just a recitation of  
 6 a standard list, is completely irrelevant to the  
 7 case of Mr Lee Castleton --  
 8 **A.** Yes.  
 9 **Q.** -- and wasn't relevant to the reasons why he was  
 10 suspended and wasn't relevant in deciding  
 11 whether or not there was a missing sum of money  
 12 that was attributable to his conduct?  
 13 **A.** No.  
 14 **Q.** Can I look, please, at some other evidence that  
 15 you gave or other aspects of it?  
 16 **SIR WYN WILLIAMS:** Before you do that, Mr Beer, it  
 17 may be that I'm being slow, but what about  
 18 paragraph 9 in this statement?  
 19 **MR BEER:** Yes, can you help us with that? Despite  
 20 what you've said -- and you're not being slow --  
 21 9 remains. You'll need to read over the page,  
 22 too.  
 23 **A.** I don't have an explanation as to why that  
 24 wasn't taken out.  
 25 **SIR WYN WILLIAMS:** Well, Mrs Rose, I am slightly

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1 concerned because your evidence to me is, in  
 2 effect, that paragraph 9 in this statement and  
 3 the previous version in the second statement  
 4 should, in effect, never have been in those  
 5 witness statements because they're wrong?  
 6 **A.** Mm.  
 7 **SIR WYN WILLIAMS:** Given that you were the person  
 8 who signed them, I would like you to try to  
 9 remember why it is they are there?  
 10 **A.** I have no recollection of it. I'm sorry.  
 11 **SIR WYN WILLIAMS:** All right.  
 12 **MR BEER:** Can we look at some other things that  
 13 happened between the audit report and the  
 14 evidence that you gave to the court, and I'd  
 15 like to try to display two documents side by  
 16 side, if I can. The first is POL00082946, at  
 17 page 65. The second is POL00071196 at page 2.  
 18 So 65 of the first document and 2 of the second.  
 19 So on the left-hand side we've got your  
 20 concluding report to Cath Oglesby, yes?  
 21 **A.** Yes.  
 22 **Q.** On the right-hand side, we've got the second  
 23 page of your final witness statement?  
 24 **A.** Mm-hm.  
 25 **Q.** You can see that in paragraph 4 you say:

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1 "He was adamant that no members of staff  
 2 could be committing theft and felt the  
 3 misbalances were due to a computer problem."  
 4 **A.** Uh-huh.  
 5 **Q.** Then on the right-hand side, second sentence of  
 6 paragraph 6:  
 7 "Mr Castleton was adamant that the  
 8 misbalances were due to a computer problem and  
 9 that no members of his staff could be committing  
 10 theft."  
 11 Yes?  
 12 **A.** Mm-hm.  
 13 **Q.** Does it follow that you were largely using the  
 14 audit report as your basis for writing your  
 15 witness statement?  
 16 **A.** I would think I probably did, yes.  
 17 **Q.** You see, in your contemporaneous record, you  
 18 say:  
 19 "... on our arrival the subpostmaster was  
 20 very pleased to see us."  
 21 Can you see that?  
 22 **A.** Yes.  
 23 **Q.** Can you understand the potential relevance of  
 24 that information?  
 25 **A.** Sorry, what do you mean by that?

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1 "On 23 March, I attended the branch [and you  
 2 give the address] together with my colleague  
 3 Chris Taylor. We arrived at approximately  
 4 8.00 am. [No] previous involvement ..."  
 5 Yes?  
 6 **A.** Mm-hm.  
 7 **Q.** You say:  
 8 "The process of carrying out the audit  
 9 involves physically counting the cash and  
 10 stock", et cetera.  
 11 Yes?  
 12 **A.** Correct.  
 13 **Q.** "Mr Castleton explained he had been having  
 14 problems balancing the books ..."  
 15 You see in the left-hand side document, four  
 16 lines in, you say in that:  
 17 "He explained problems he had been having at  
 18 the office regarding balancing. His problems  
 19 with balancing started in week 43 with  
 20 a misbalance of [minus] 4230.97."  
 21 **A.** Mm-hm.  
 22 **Q.** Can you see that you say that in paragraph 6, on  
 23 the right-hand side?  
 24 **A.** Yes.  
 25 **Q.** Then you continue on the left-hand side:

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1 **Q.** Can you understand the potential relevance of  
 2 you recording that the subpostmaster was very  
 3 pleased to see the auditors?  
 4 **A.** I probably was just stating the fact at the time  
 5 that he just seemed pleased to see us.  
 6 **Q.** Why would you include it in your original note?  
 7 **A.** Oh, I don't know, just making notes at the time  
 8 of what occurred.  
 9 **Q.** You don't make a note of everything that  
 10 occurred, do you?  
 11 **A.** I wouldn't have thought so, but --  
 12 **Q.** So why did you make a note of this?  
 13 **A.** I obviously felt at the time the need to do  
 14 that, back in 2004. I can't say why I did it.  
 15 I obviously thought that it was relevant at the  
 16 time.  
 17 **Q.** You'll see that it's not in your witness  
 18 statement, is it?  
 19 **A.** No.  
 20 **Q.** Why is that?  
 21 **A.** (*Unclear*) later. I don't know, I can't answer  
 22 that one.  
 23 **Q.** Do you know why it was omitted from your witness  
 24 statement --  
 25 **A.** No.

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1 Q. -- given that the witness statement was  
 2 seemingly based on what is said in the original  
 3 note?  
 4 A. No, I've no explanation for that, why it would  
 5 be -- I guess the report was more to Cath,  
 6 whereas the witness statement was just a witness  
 7 statement. So, no, I don't know why it wouldn't  
 8 be in both.  
 9 Q. Let's look at some other issues, then. You see  
 10 in the contemporaneous note, after the bit  
 11 that's highlighted, it says:  
 12 "He had been in contact with the Retail Line  
 13 Manager Cath Oglesby and the Horizon helpline  
 14 regularly since the problems began."  
 15 A. Mm-hm.  
 16 Q. That's not in your witness statement, is it?  
 17 A. No.  
 18 Q. You understand the potential relevance of that  
 19 information, don't you?  
 20 A. But that would be him saying he'd done that,  
 21 rather than me being a witness to him doing  
 22 that.  
 23 Q. Why did you record that he had said it in your  
 24 original note?  
 25 A. Why?

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1 having consumed alcohol, is there?  
 2 A. No.  
 3 Q. If we look on the right-hand side, if we go  
 4 forward a page to page 3 please, you say:  
 5 "I do remember [paragraph 10] that  
 6 Mr Castleton left the branch at lunchtime and  
 7 returned in the afternoon smelling strongly of  
 8 alcohol."  
 9 A. Mm-hm.  
 10 Q. So there's no reference in the contemporaneous  
 11 note of nearly two years previously to that  
 12 issue and that's found its way into the witness  
 13 statement. How has that come about?  
 14 A. I don't know. It must have been a comment  
 15 I felt necessary to mention but I can't remember  
 16 it.  
 17 Q. Wouldn't that be a relevant matter to record at  
 18 the time, rather than years later?  
 19 A. Potentially, that's -- I think the audit report  
 20 was just a report of what happened on the day of  
 21 the audit. I don't know why that wasn't in or  
 22 came later.  
 23 Q. So why is it that these two bits of information  
 24 that might help Mr Castleton have been excluded  
 25 from the witness statement but the paragraph 9

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1 Q. Yeah.  
 2 A. I guess we just noted down things that happened,  
 3 so, um, I don't know.  
 4 Q. Why was it omitted from your witness statement,  
 5 again, when the witness statement was seemingly  
 6 based on what was said in the original note?  
 7 A. I don't know.  
 8 Q. Do you think these two pieces of information  
 9 might assist Mr Castleton: he was very pleased  
 10 or he was pleased to see the auditors and he  
 11 told you "I've been in contact with the Retail  
 12 Line Manager, Cath Oglesby, and the Horizon  
 13 helpline regularly since these problems began"?  
 14 A. I don't know. I can't answer for what I did  
 15 back in 2004 but I can only presume that the  
 16 audit report would have been part of the  
 17 evidence and so it wasn't duplicated.  
 18 Q. If that's the case, there's no point in making  
 19 a witness statement, is there? You would say,  
 20 "Please see my audit report, I've nothing more  
 21 to say".  
 22 A. I don't know.  
 23 Q. Can you see in the audit report on the left-hand  
 24 side, there's no reference to Mr Castleton  
 25 coming back from lunch smelling of alcohol or

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1 has been left in and paragraph 10 has been  
 2 added?  
 3 A. I honestly don't know why other things have not  
 4 been included at the time.  
 5 Q. Can we turn to what you said about this when you  
 6 gave evidence at the trial, POL00070183. Thank  
 7 you. This is a transcript of the evidence that  
 8 you gave to His Honour Judge Havery QC on  
 9 11 December 2006.  
 10 A. Mm-hm.  
 11 Q. If we can scroll down, please, we can see that  
 12 Mr Morgan appeared on behalf of the Post Office  
 13 and Mr Castleton appeared in person. If we can  
 14 just go to page 11 of the transcript, please, at  
 15 the top of the page you're being asked by  
 16 Mr Castleton some questions not dissimilar to  
 17 the ones I'm asking, and you say:  
 18 "I was asked if there was anything specific  
 19 I can remember, and [then some inaudible words],  
 20 I could remember that I smelt alcohol on you."  
 21 He says:  
 22 "No. I appreciate that so that is, in your  
 23 opinion [inaudible words]."  
 24 Answer by you:  
 25 "It's just a vague memory I had of the

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1 office.  
 2 "Question: Right, okay.  
 3 "Answer: It's [presumably one and a half  
 4 years ago, two-and-a-half years ago]. Yes.  
 5 "Question: And how, [a question].  
 6 "Answer: A lot.  
 7 "Question: Could we now go back to  
 8 page 475. Can you tell me what [that] is,  
 9 please?  
 10 "Answer: That's the first page of the audit  
 11 report."  
 12 That's the document that I've been showing  
 13 you at page 65:  
 14 "Question: ... No mention of alcohol on  
 15 there?  
 16 "Answer: Because it wouldn't be relevant.  
 17 "Question: But it is contracted [inaudible  
 18 words].  
 19 "Answer: (Several inaudible words)."  
 20 Then the judge intervenes:  
 21 "Again, As it is an issue in the case, but  
 22 you are putting to the witness that you did not  
 23 smell of alcohol?  
 24 "Mr Castleton: I strongly did not, my Lord."  
 25 You said:

1 who sent it to you -- has included in square  
 2 brackets after paragraphs some questions to you  
 3 in bold and in italics, yes?  
 4 A. Mm-hm, yeah.  
 5 Q. If we just go to the third page, please. We see  
 6 that paragraph, paragraph 10, where you had  
 7 written, it was in the first draft too:  
 8 "I do remember that Mr Castleton left the  
 9 branch at lunchtime and returned in the  
 10 afternoon smelling strongly of alcohol."  
 11 He, the solicitor, asked you "Was he drunk?"  
 12 Yes?  
 13 A. I can see that's what he's asked, yes.  
 14 Q. In the final version you don't add to that, you  
 15 don't say that he was drunk or he wasn't drunk,  
 16 yes? We've seen the final version?  
 17 A. Yeah.  
 18 Q. Standing back -- that can come down now, please.  
 19 Standing back, looking at the two passages  
 20 that were not included in the witness statement  
 21 but were in the audit report, about Mr Castleton  
 22 saying he was pleased to see you and that he'd  
 23 reported matters to the Retail Line Manager and  
 24 the helpline, and the inclusion of the  
 25 paragraph 9 information, about failures in

1 "... I can only apologise. I can only go by  
 2 what my memory was."  
 3 He says:  
 4 "I appreciate that. But [inaudible words]  
 5 just clarifying between what the audit report  
 6 ... and what your statement says."  
 7 You said:  
 8 "I wouldn't put it in the audit report  
 9 because [something] had any relevance to whether  
 10 or not the money was there ... or whether the  
 11 audit was, the office was short or [presumably  
 12 'not']."  
 13 Given the fact that you say there that it  
 14 wasn't in the audit report because it wouldn't  
 15 have any relevance to whether the money was  
 16 there or not or whether the office was short or  
 17 not, why was it included in the witness  
 18 statement?  
 19 A. I don't know. Looking back on it, maybe it  
 20 shouldn't have been.  
 21 Q. Can we go, please, to POL00071231. This is  
 22 a copy of one of the drafts of your second  
 23 witness statement -- sorry, your first witness  
 24 statement. If we just scroll through it,  
 25 please. You'll see that -- and it's Mr Dilley

1 security measure sand the addition of  
 2 "Mr Castleton smelt strongly of alcohol", did  
 3 you ever feel that you were being encouraged by  
 4 your employer to include matters that were  
 5 helpful to it, the employer, and exclude matters  
 6 that were helpful or potentially helpful to  
 7 Mr Castleton?  
 8 A. No.  
 9 Q. In those circumstances, how has the witness  
 10 statement ended up as it is, with those two  
 11 things that were in the audit report not in the  
 12 witness statement, and the addition of the  
 13 alcohol and the failures in security audit?  
 14 A. Sorry, what do you mean by that?  
 15 Q. How, standing back, has this happened?  
 16 A. I don't know, I clearly did the witness  
 17 statement to -- some two years after the audit  
 18 report and picked out the bits that I believed  
 19 needed to go in it at the time.  
 20 Q. Why wouldn't you just say, for example, it's  
 21 only a sentence "Mr Castleton was pleased to see  
 22 us"?  
 23 A. I don't know.  
 24 Q. Okay, I'll move on to a different topic, please.  
 25 Can you remember performing the role of

1 disclosure officer?

2 **A.** No, I can't remember that being a role that  
3 I had.

4 **Q.** Can we look, please, at FUJ00155090. At the  
5 foot of the page, it's not an email exchange  
6 that you are included in -- if we just scroll up  
7 a little bit, sorry. It's an email from Jarnail  
8 Singh, a Post Office solicitor, to Gareth  
9 Jenkins and some others of 1 October 2012.

10 Mr Singh says to Mr Jenkins:

11 "Welcome from your annual leave and your  
12 assistance advice in the past prosecution cases  
13 and I understand you are assisting my colleagues  
14 at present. I need your urgent [I think that's  
15 supposed to say 'assistance']. Judge has this  
16 morning ordered the prosecution to have the  
17 following report ready to be served within seven  
18 days.

19 "On [I think that's 'advice'] Post Office  
20 Limited have appointed one of their  
21 investigators, Helen Rose, as disclosure officer  
22 dealing with Horizon challenges. She has  
23 prepared a document/spreadsheet detailing all  
24 such cases, past and present, approximately 20  
25 in total, although none thus far successfully

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1 challenges to the integrity of Horizon data.  
2 Was this the first time you were aware of  
3 Fujitsu being contacted to provide an expert  
4 report confirming that the system was robust?

5 **A.** I can't answer that. I don't think I was in  
6 that email, was I?

7 **Q.** No.

8 **A.** No.

9 **Q.** But you, according to this, had prepared  
10 a document or spreadsheet detailing cases. Can  
11 you remember having been asked to do that?

12 **A.** I've seen that report in the documents. I can't  
13 actually remember producing it but I have  
14 actually seen a document in the evidence pack.

15 **Q.** Can we look, please, at FUJ00156648. This is  
16 a summary of information seemingly reviewed by  
17 you. It appears to be one iteration of the  
18 document summary circulated to Mr Jenkins in  
19 advance of a report that he wrote.

20 **A.** Yes.

21 **Q.** If we look at page 5, please, and scroll down --  
22 and a bit more, please -- we can see that it's  
23 authored by you, a member of the Post Office  
24 Security Team, on 30 August 2012?

25 **A.** Yes.

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1 argued in court. Post Office have been advised  
2 to obtain an experts report from Fujitsu UK, the  
3 Horizon System developers, confirming the system  
4 is robust. Post Office maintain the system is  
5 robust, but in the light of adverse publicity,  
6 from legal viewpoint is that defence should be  
7 given opportunity to test the system, should  
8 they still wish to do so, on consideration of  
9 our report."

10 You see that it says that the Post Office  
11 has appointed one of its investigators, you, as  
12 its disclosure officer dealing with Horizon  
13 challenges.

14 **A.** Yes --

15 **Q.** Were you appointed as the disclosure officer?

16 **A.** I've seen that report in the documentation  
17 that's been sent to me but I don't recall being  
18 appointed as a disclosure officer but, clearly,  
19 that's what they called it.

20 **Q.** Did you ever receive any training in the role of  
21 a disclosure officer in a criminal investigation  
22 or prosecution?

23 **A.** No.

24 **Q.** At this time, you were seemingly aware of  
25 a number of cases where there had been

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1 **Q.** Is that how you would that have regarded  
2 yourself as at August 2012. Although you were  
3 performing analytical roles, you were part of  
4 the Security team?

5 **A.** Yes.

6 **Q.** If we go back to the first page, please. You  
7 say, in "Overview":

8 "Over the years some post offices under  
9 investigation for losses have claimed that the  
10 Horizon System is at fault. As the Post Office  
11 is dependent on the reliability of our system to  
12 be able to prosecute offenders; we have to be  
13 able to defend our system in the courts."

14 Is that a reasonably accurate representation  
15 of your belief at the time?

16 **A.** At the time, yes.

17 **Q.** What research did you undertake in order to  
18 compile this list of, in this instance, five  
19 cases?

20 **A.** I actually don't remember writing this report,  
21 but looking at it and reading it, I would  
22 summarise that I pulled reports up, audit  
23 reports or even investigation reports.

24 **Q.** Was that done in any systematic way?

25 **A.** I couldn't answer that.

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1 Q. What was the purpose of writing the report?  
 2 A. I presume somebody must have asked me to pull  
 3 some things together. I honestly can't  
 4 remember. As I say, I can't actually remember  
 5 writing this report. Although my name is on it,  
 6 I can't remember writing it.  
 7 Q. You would want to know the purpose of the report  
 8 and what was going to be done with it before  
 9 writing it, presumably?  
 10 A. I must have understood why it was wanted at the  
 11 time, yes.  
 12 Q. Would you have understood that it was meant to  
 13 be a complete and comprehensive list of  
 14 challenges to the integrity of Horizon data?  
 15 A. I couldn't comment on that, without seeing what  
 16 the request was before the report was written.  
 17 Q. At the time of writing this report, which is  
 18 August 2012, were you were of any of the  
 19 following bugs, errors or defects, that they had  
 20 been attributed names that broadly described the  
 21 problems, something called the receipts and  
 22 payments mismatch bug?  
 23 A. No.  
 24 Q. The Callendar Square or Falkirk bug?  
 25 A. No.

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1 established that Miss Tracey Merritt also  
 2 operated the outreach Post Office at Chetnole.  
 3 Both these offices were audited on Thursday 29  
 4 September 2011. At audit Yetminster was  
 5 reported to be [£8,000-odd] short and Chetnole  
 6 Outreach [£3,000-odd] short, giving a total  
 7 overall shortage of [nearly £12,000].  
 8 "During interview, Miss Merritt produced  
 9 a large document regarding an ongoing enquiry by  
 10 Shoosmiths solicitors in respect of the Justice  
 11 for SubPostmasters Alliance stating that she  
 12 believed that the Post Office Horizon equipment  
 13 was the actual cause of this loss.  
 14 "At the start of the interview, Miss Merritt  
 15 blamed the Horizon System and stated she had  
 16 problems with transferring cash from Yetminster  
 17 to Chetnole outreach. Halfway through the first  
 18 tape Miss Merritt states 'because there are  
 19 issues with your computers and I know the Post  
 20 Office are not going to admit it but there is'.  
 21 "6 minutes into the second tape Miss Merritt  
 22 says 'I'm not trying to blame the Horizon  
 23 System, I am saying that my office kept coming  
 24 up with losses'. Towards the end of the second  
 25 tape transcript Miss Merritt admitted that the

79

1 Q. The suspense account bug?  
 2 A. No.  
 3 Q. The Dalmellington or branch outreach bug?  
 4 A. No.  
 5 Q. The remming in bug?  
 6 A. No.  
 7 Q. The remming out bug?  
 8 A. No.  
 9 Q. The local suspense account bug?  
 10 A. No.  
 11 Q. The reversals bug?  
 12 A. No.  
 13 Q. The data tree build bug?  
 14 A. No.  
 15 Q. The Girobank discrepancies bug?  
 16 A. No.  
 17 Q. So what did you do? Did you just search through  
 18 some old case files and look for cases where  
 19 Horizon had been called into question?  
 20 A. I potentially did. As I say, I don't remember  
 21 writing this but that looks like what I've done.  
 22 Q. Just look at the brief summaries of some recent  
 23 challenges, Yetminster, "Brief overview":  
 24 "This case came ... from a tip-off made by  
 25 a holiday relief postmistress. It was

78

1 losses had been accumulating since the end of  
 2 July 2011 and she had not been putting money in  
 3 for these losses, simply rolling the losses and  
 4 inflating the cash.  
 5 "Mr Gary Thomas, lead Officer in this case  
 6 commented at the end of his report that it  
 7 should be noted that this case is likely to be  
 8 a further challenge toward the integrity of  
 9 [Horizon]."  
 10 Then "Outcome", scrolling down:  
 11 "Recoveries ...  
 12 "3 charges of False Accounting ... Letter  
 13 sent to Miss Merritt ..."  
 14 Then there appears to be a cut and paste of  
 15 the letter to her, can you see that in the last  
 16 bullet point?  
 17 Then, over the page:  
 18 "Post Office Limited remains entirely  
 19 satisfied as to the evidential strength of its  
 20 case against you ..."  
 21 Then at the end of the letter:  
 22 "Any such allegations will be robustly  
 23 defended. Post Office continues to have  
 24 absolute confidence in the text of the Horizon  
 25 computer system and its branch accounting

80

1 processes."

2 Did you take any steps to satisfy yourself

3 as to the accuracy of what was being set out

4 here, ie yourself --

5 **A.** No.

6 **Q.** -- to investigate or cause to be investigated

7 whether the Horizon System and its branch

8 accounting processes had integrity?

9 **A.** No, I think this report looks like I've taken

10 summaries from case files, so these would have

11 been what had been documented in the case files.

12 **Q.** So in respect of all of the five branches there,

13 all you're doing is really transferring from

14 a case file what is said there into a shorter

15 document?

16 **A.** For summary. That's what it looks like, yes.

17 **Q.** Okay, in which case, I won't ask you about the

18 other four, save for the last one, Seema Misra,

19 which is on page 4, please. "West Byfleet":

20 "An audit took place on 14 January ... which

21 revealed a shortage of [£74,000].

22 "[Mrs Misra] informed the auditors that the

23 account would be short by between £50,000 and

24 £60,000. She completed a handwritten signed

25 statement to the auditors blaming previous staff

81

1 "... Post Office prosecution team did not

2 accept the reduced plea.

3 "An expert witness was put forward by the

4 defence to challenge the integrity of the

5 Horizon System."

6 Then "Outcome", at the bottom of the page:

7 "After a lengthy trial at Guildford Crown

8 Court ... the jury came to a verdict ... when

9 they found the Defendant guilty of theft. The

10 case turned from a relatively straightforward

11 general deficiency case to an unprecedented

12 attack on the Horizon System."

13 Is that your language or are you cutting and

14 pasting that from somewhere else?

15 **A.** No, I would say that was cut and paste from the

16 case file.

17 **Q.** "We were beset with [an unparalleled] degree of

18 disclosure requests by the Defence. Through the

19 hard work of everyone, Counsel Warwick Tatford,

20 Investigation Officer Jon Longman and through

21 the considerable expertise of Gareth Jenkins of

22 Fujitsu we were able to refute all suggestions

23 made by the Defence that the Horizon System was

24 faulty."

25 Again, is that cut and pasted or is that

83

1 for the shortage.

2 "Summary.

3 "Mrs Misra admitted during the interview

4 that she knew the office accounts would be

5 short.

6 "[She] continued to blame old staff ...

7 "Mrs Misra said the office had been running

8 short of cash for about a year and she had been

9 trying to reduce the loss by putting in money

10 from her own shop business.

11 "At no point during the audit or interview

12 was any Horizon integrity issue raised ...

13 "Comment from legal [memorandum] from

14 25 March 2009: The Defence have also asked the

15 question which I set out here verbatim: 'When

16 was it that the Post Office first became aware

17 that there were irregularities with regard to

18 the accounts? Was it when the final audit had

19 been carried out or had there been concerns at

20 an earlier stage?'

21 "This was the first time that the integrity

22 of the Horizon System was mentioned.

23 "In May 2009, Mrs Misra's defence team

24 offered a plea to false accounting but not to

25 theft.

82

1 your judgement?

2 **A.** I'd say that's cut and pasted.

3 **Q.** "It is to be hoped the case will set a marker to

4 dissuade other Defendants from jumping on the

5 Horizon bashing bandwagon."

6 Again, is that cut and pasted?

7 **A.** I would say so, yes.

8 **Q.** "Mrs Misra was wound guilty of theft and

9 sentenced to 15 months imprisonment.

10 "[And] also found guilty of false accounting

11 and sentenced to 6 months imprisonment

12 [concurrently]."

13 Then your conclusions. Presumably, this is

14 your writing, rather than being cut and pasted?

15 **A.** Like I say, I can't remember writing this report

16 but it does look as though -- that I did.

17 **Q.** "Although there have been attempts to discredit

18 the Horizon System via the courts, to date the

19 Post Office have been able to defend the

20 integrity of the Horizon System at all levels."

21 Is that how you viewed this? Attempts to

22 discredit the Horizon System in the courts,

23 rather than people accused of crime defending

24 themselves?

25 **A.** I can only read what was put there. At the

84

1 time --

2 **Q.** We can all read what's put there?

3 **A.** Absolutely.

4 **Q.** But I'm asking you, is that how you viewed it --

5 **A.** At the time.

6 **Q.** -- this wasn't people trying to defend

7 themselves, these were attempts to discredit

8 Horizon?

9 **A.** At the time, I was not aware of any Horizon

10 issues, and the bugs that you've mentioned,

11 I was obviously not aware of them.

12 **Q.** "When questioning the integrity of the Horizon

13 System the defence solicitors are making similar

14 disclosure requests, indicating that disclosure

15 requests in future challenges will be similar to

16 those made in past Horizon integrity challenges.

17 "Depending on where the loss was identified

18 this can sway the disclosure requests slightly

19 into requiring further details and operating

20 procedures around specific transactions

21 including background processes, ie the

22 processing of cheques once they have left the

23 office and electronic funds transfer records.

24 "There have also been requests for

25 information on training materials and training

85

1 **Q.** What was the process, then?

2 **A.** Ooh, I can't remember. I can't remember what

3 the process was back then.

4 **Q.** Your report continues:

5 "All operational personnel have been asked

6 to report directly to me when at any point

7 throughout the interviews/court process that the

8 integrity of the Horizon System has been

9 mentioned.

10 "This will be continually monitored/updated

11 to ensure that we are aware of any Horizon

12 integrity challenges at the earliest opportunity

13 and are prepared for any future challenges at

14 all stages of the investigation and prosecution

15 process."

16 In taking on this is role, other than

17 looking at some past case files, did you take

18 yourself any steps to satisfy yourself as to the

19 integrity of the Horizon data?

20 **A.** No, other than gathering information.

21 **Q.** Were you asked to commission any expert or

22 independent review of Horizon integrity?

23 **A.** Not that I can recall, no.

24 **Q.** Did you speak to any IT experts, whether within

25 or outside the Post Office?

87

1 records, including call logs to NBSC. In the

2 Misra case the defence questioned a lot of

3 technical aspects of the data held at Fujitsu,

4 these challenges were refuted by Gareth

5 Jenkins."

6 Then "Future actions", were these your ideas

7 here?

8 **A.** I can't answer, I don't know.

9 **Q.** Well, it looks like --

10 **A.** Whether --

11 **Q.** -- it, doesn't it?

12 **A.** It looks like it but I don't know whether that

13 was in liaison with anybody else or just purely

14 my comments.

15 **Q.** The first part of the process had already been

16 put in place:

17 "... where there is any possible challenge

18 [to Horizon, this] will be ... reported in the

19 48-hour offender report."

20 Was the purpose of this to alert the Post

21 Office to, as you call them, attacks on

22 Horizon's integrity?

23 **A.** No, I would have -- I read that as it is trying

24 to understand if there is any further questions

25 on it.

86

1 **A.** Not that I can recall, no.

2 **Q.** Did you ask what Fujitsu knew about any bugs,

3 errors or defects in Horizon?

4 **A.** No, not that I can recall at this time.

5 **Q.** Did you ask what work had previously been done

6 to test the integrity of the system?

7 **A.** No.

8 **Q.** Were you asked by the Post Office to take any

9 steps to better understand any weaknesses in the

10 system and consider --

11 **A.** No.

12 **Q.** -- what ought to be disclosed in response to any

13 defence disclosure request in your role as

14 disclosure officer?

15 **A.** Not that I can recall, no.

16 **Q.** Instead, were you willing to accept the stock

17 line that Horizon was robust?

18 **A.** At the time of writing this, yes.

19 **Q.** Can I turn to a report that you authored in June

20 2013. That document can come down, please --

21 relating to transaction logs at the Lepton sub

22 post office. Can we start by looking at

23 FUJ00086811. Thank you.

24 You've been shown a copy of this report when

25 you were making your witness statement earlier

88

1 in the year, yes?  
 2 **A.** I vaguely remember this report, yes.  
 3 **Q.** Yes. You'll see that it's said to be version 1  
 4 of the report --  
 5 **A.** Yes.  
 6 **Q.** -- last edited by you on 12 June 2013. If we go  
 7 to page 3, please, and look at the foot of the  
 8 page, just a bit further down, please. We can  
 9 see that it was authored by you on 12 June 2013.  
 10 **A.** Yeah.  
 11 **Q.** You were still within the Security team but you  
 12 were described as a Fraud Analyst by then?  
 13 **A.** Yeah.  
 14 **Q.** This report explains a problem at the Lepton  
 15 Branch that was an issue that was quoted again  
 16 and again over the next decade or so,  
 17 essentially, and I want to ask you about how you  
 18 came to be commissioned to write this report.  
 19 Something about the content of it and the  
 20 consequences of you writing it. But just going  
 21 back to that first page, please, we'll see that  
 22 it's said to be "Draft".  
 23 **A.** Mm.  
 24 **Q.** Do you know whether it remained a draft?  
 25 **A.** I don't. I don't know.

89

1 given for £3.91."  
 2 So two transactions there; is that right?  
 3 **A.** That's what it looks like, yes, yeah.  
 4 **Q.** A customer needing to pay their BT bill for  
 5 £76-odd, taking £80 out of a cash account with  
 6 Lloyds and being given change of £3.91, yes?  
 7 **A.** Yeah.  
 8 **Q.** Then:  
 9 "At 10.37 on the same day the British  
 10 Telecom bill payment was reversed out to cash  
 11 settlement."  
 12 Can you explain what "reversed out to cash  
 13 settlement" means?  
 14 **A.** From memory, it -- the transaction would have  
 15 been reversed out of the system.  
 16 **Q.** Yes, what does that mean?  
 17 **A.** Taken back out of the system, cancelled,  
 18 I guess, if that's the right word to call it.  
 19 **Q.** So the BT element of the two transactions was  
 20 reversed out, meaning -- is this right -- that  
 21 the system showed that there was a reversal so  
 22 that --  
 23 **A.** Yes.  
 24 **Q.** -- the BT bill was not paid --  
 25 **A.** Yes.

91

1 **Q.** If it wasn't finalised, can you think of  
 2 a reason for that?  
 3 **A.** I can't, no, no.  
 4 **Q.** You'll see that it's said to be "Confidential  
 5 and legally privileged" at the top of that page  
 6 and, indeed, all other pages. Did you include  
 7 that, "Confidential and legally privileged"?  
 8 **A.** I would have probably been advised to put that  
 9 on but I couldn't tell you who asked me to put  
 10 it on.  
 11 **Q.** Do you know in what circumstances the legal  
 12 privilege that you're referring to there arose?  
 13 **A.** I don't, no.  
 14 **Q.** What type of person, performing what function,  
 15 would have advised you to include the words  
 16 "Confidential and legally privileged"?  
 17 **A.** I have no recollection of who would have advised  
 18 me to put that on.  
 19 **Q.** If we go over the page, please, to page 1.  
 20 Looking at the "Executive Summary":  
 21 "A transaction took place at Lepton [sub  
 22 post office with the FAD code 19320] on  
 23 4 October at 10.42 am for a British Telecom bill  
 24 payment for £76.09; this was paid for by  
 25 a Lloyds TSB cash withdrawal for £80 and change

90

1 **Q.** -- and in fact £76.09p was withdrawn from the  
 2 system --  
 3 **A.** Yeah.  
 4 **Q.** -- and paid out as cash?  
 5 **A.** Yeah.  
 6 **Q.** So you've got an unpaid BT bill?  
 7 **A.** (Unclear), yeah.  
 8 **Q.** Exactly:  
 9 "The branch was issued with a Transaction  
 10 Correction for £76.09, which they duly settled;  
 11 however the postmaster denied reversing this  
 12 transaction and involved a Forensic Accountant  
 13 as he believed his reputation was in doubt."  
 14 **A.** Mm.  
 15 **Q.** So, in short, this subpostmaster is saying  
 16 "Although I paid the shortfall of £76.09, I am  
 17 adamant that I didn't make the reversal,  
 18 I didn't get the money back out".  
 19 **A.** Yeah.  
 20 **Q.** Is it right that the overall conclusion was  
 21 that, although a reversal could appear in the  
 22 Credence data as though it had been done by the  
 23 subpostmaster, in fact it was the system and not  
 24 the subpostmaster that had created the reversal?  
 25 **A.** That's what it turned out to be on this case,

92

1 yes.

2 **Q.** Thank you. That gives the context for the  
3 issue.

4 **A.** Yeah.

5 **Q.** Can you help us, in relation to the  
6 commissioning of the report, why were you tasked  
7 with producing this report?

8 **A.** I can't remember who asked me to do the report,  
9 I can't actually remember who asked me to look  
10 into it but, clearly, somebody did, and I looked  
11 at the data, and --

12 **Q.** Irrespective of who asked, can you remember why  
13 would it fall to you, given your job as a Fraud  
14 Analyst in June 2013?

15 **A.** I must have been asked to look at it, look into  
16 it, to see if I could understand what had  
17 happened.

18 **Q.** Did you, for example, hold particular expertise  
19 in the analysis of Horizon transactions?

20 **A.** I did use to look at odd ones, yes.

21 **Q.** Had you previously had experience of  
22 investigating discrepancies shown on the Horizon  
23 System?

24 **A.** At the time I used to look at a lot of the  
25 Horizon System data, yes.

93

1 understand the reason behind it. My main  
2 concern is that we use the basic ARQ logs for  
3 evidence in court and if we don't know what  
4 extra reports to ask for then in some  
5 circumstances we would not be giving a true  
6 picture."

7 **A.** Mm.

8 **Q.** Then if we look at the right-hand side page,  
9 your email to Mr Jenkins, at the top of the  
10 page, ignoring the first four words:  
11 "I can see where this transaction is now and  
12 understand the reason behind it. My main  
13 concern is that we use the basic ARQ logs for  
14 evidence in court", et cetera.  
15 Yes?

16 **A.** Yes.

17 **Q.** We can see that you've cut and pasted the bold  
18 text in the report --

19 **A.** I am --

20 **Q.** -- from your question to Mr Jenkins, yes?

21 **A.** Mm-hm, yeah.

22 **Q.** Then if we, on the left-hand document go back --  
23 sorry, on the right-hand document go back to  
24 page 2, you see Mr Jenkins' reply:  
25 "I understand your concerns.

95

1 **Q.** I'm thinking about discrepancies in particular,  
2 ie shortfalls.

3 **A.** Some, yes.

4 **Q.** Can I turn to your methodology. Can you  
5 remember what your method was, how you went  
6 about investigating this issue?

7 **A.** I can't, no, other than what I can read in the  
8 report.

9 **Q.** On reading what's in the report, does it appear  
10 that you essentially asked a series of  
11 questions to Mr Gareth Jenkins in email form?

12 **A.** Yes.

13 **Q.** He replied and you, essentially, cut and paste  
14 your questions and the substance of his answers  
15 into the report?

16 **A.** I did, yes.

17 **Q.** Can we look at a couple of documents side by  
18 side. On the left side can we have FUJ00086811,  
19 at page 3. On the right-hand side, POL00097481,  
20 at page 3. Page 3 of each document, please.  
21 Thank you very much.

22 On page 3 of the report, that's the  
23 left-hand side document, you say about halfway  
24 down the page:  
25 "I can see where this transaction is and now

94

1 "It would be relatively simple to add  
2 an extra column into the existing ARQ report",  
3 et cetera.

4 **A.** Mm-hm.

5 **Q.** Then on the left side, you can see:  
6 "Answer -- I understand your concerns",  
7 et cetera, et cetera.  
8 Can you see that?

9 **A.** Yeah.

10 **Q.** So it appears that the way you'd gone about  
11 things is ask Mr Jenkins a series of questions,  
12 cut and paste the substance of what you've asked  
13 and the substance of his reply into the report,  
14 yes?

15 **A.** Correct, yes.

16 **Q.** That's aside from the recommendations part,  
17 which I'll come back to in a moment. Can I ask  
18 you some questions about the substance of what  
19 you said to Mr Jenkins and his replies. Let's  
20 start with the email that we're looking at and  
21 just go back to page 3. You say at the top of  
22 the page:  
23 "I can see where this transaction is ..."  
24 That's the reversal transaction shown by  
25 some data that has been provided, some ARQ data?

96

1 A. Mm-hm.  
 2 Q. "... and now understand the reason behind it."  
 3 You say:  
 4 "My main concern is that we use the basic  
 5 ARQ logs for evidence in court and if we don't  
 6 know what extra reports to ask for them in some  
 7 circumstances we would not be giving a true  
 8 picture."  
 9 A. Mm-hm.  
 10 Q. Would you agree that this suggests that you  
 11 understood the significance of the data that  
 12 Mr Jenkins had given you?  
 13 A. Um, I would say that it made me realise there  
 14 were -- there was more data available than what  
 15 came through in the basic logs.  
 16 Q. But it's a bit more than that, isn't it?  
 17 Firstly, you realise the significance not only  
 18 for the branch at Lepton but, more generally,  
 19 for criminal actions being pursued by the Post  
 20 Office, the criminal proceedings being pursued  
 21 by the Post Office?  
 22 A. Yeah.  
 23 Q. Because you say:  
 24 "... we use basic ARQ logs for evidence in  
 25 court. If we don't know what extra reports to  
 97

1 Mr Jenkins, show, we may not be presenting true  
 2 evidence to a court"; that's what you're saying,  
 3 isn't it?  
 4 A. Yes, it's just saying, "Make us aware of other  
 5 things that we can ask for".  
 6 Q. So that the Post Office can give true evidence  
 7 to a court?  
 8 A. Yes.  
 9 Q. You carry on in your email:  
 10 "I know you are aware of all of the Horizon  
 11 integrity issues and I want to ensure that the  
 12 ARQ logs are used and understood fully by our  
 13 operational staff that have to work with this  
 14 data both in interviews and in court."  
 15 Does this suggest that by February 2013, you  
 16 were aware of "all of the Horizon integrity  
 17 issues"?  
 18 A. No, not all of them. I would be aware that  
 19 questions were being questioned on Horizon,  
 20 which is probably why I needed to understand  
 21 what had happened here.  
 22 Q. What were you referring to when you said,  
 23 "I know that you are aware of all the Horizon  
 24 integrity issues"?  
 25 A. I believe I would have just been referring to  
 99

1 ask for then in some circumstances we would not  
 2 be giving a true picture."  
 3 That means we may not be presenting a true  
 4 picture in evidence to the court, doesn't it?  
 5 A. Yes. Either way, yes.  
 6 Q. That would obviously be a significant concern  
 7 for you, that the Post Office is not presenting  
 8 true evidence in court, wouldn't it?  
 9 A. Yes, which is probably why I put it in there,  
 10 yeah.  
 11 Q. It would be a significant concern for the Post  
 12 Office, wouldn't it?  
 13 A. Yes.  
 14 Q. Did you consider that if there was a discrepancy  
 15 between what could be understood in the ARQ data  
 16 that you received and in the raw data, there  
 17 were likely to be cases where a prosecution had  
 18 proceeded without a true picture being presented  
 19 to the court?  
 20 A. On the data I looked at here, it was just to do  
 21 with reversals of transactions.  
 22 Q. This is raising a wider point though, isn't?  
 23 A. Potentially --  
 24 Q. "We get basic ARQ logs, if we don't know what  
 25 extra reports, ie the reps you've now shown me,  
 98

1 the fact that we needed explanations on this  
 2 particular case, rather than anything indicating  
 3 bigger issues that I wasn't aware of. I just  
 4 needed to understand this one.  
 5 Q. Mrs Rose, that sentence is not talking at all  
 6 about data in this case. It's talking about  
 7 a broader point, isn't it? You're saying to  
 8 Mr Jenkins, "I know you are aware of all the  
 9 Horizon integrity issues". It's not talking  
 10 about different species of ARQ logs, is it?  
 11 A. I think it was just meaning we needed to get  
 12 an understanding of what had happened.  
 13 Q. It doesn't say that, does it? It says, "I know  
 14 you're aware of all the Horizon integrity  
 15 issues" and my questions are what Horizon  
 16 integrity issues were you aware of and what  
 17 Horizon integrity issues did you know that  
 18 Mr Jenkins was aware of?  
 19 A. I didn't know that he knew of any and this was  
 20 the first real difference that I'd come across.  
 21 Q. If you didn't know that he was aware of any  
 22 Horizon integrity issues, why did you email him  
 23 and say, "I know you're aware of all of the  
 24 Horizon integrity issues"?  
 25 A. Because there would probably be talk going  
 100

1 around and I guessed he would have been aware of  
 2 it.  
 3 **Q.** So it's just referencing the rumour-mill, is it?  
 4 **A.** Yes.  
 5 **Q.** Can we look at page 1 of the same chain, please.  
 6 If we see here you're referring the email string  
 7 to Angela van den Bogerd and Elaine Spencer, and  
 8 you say:  
 9 "For information.  
 10 "Email string may be of interest. I'm not  
 11 really sure where to take this. Happy to try  
 12 for a change request if you would like me too  
 13 but at this moment in time I don't want to  
 14 tackle one small issue when we may need to  
 15 challenge deeper issues with the way we see data  
 16 from Fujitsu/Credence."  
 17 You appear by this time to have understood  
 18 how significant it was that there were -- if it  
 19 was the case, that there were things that could  
 20 appear differently in the underlying audit data,  
 21 as opposed to the ARQ logs that you were being  
 22 given, correct?  
 23 **A.** That's what it looks like, yes.  
 24 **Q.** You were sufficiently concerned to escalate this  
 25 to Angela van den Bogerd?

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1 **A.** I'm not aware whether it was or wasn't.  
 2 **Q.** In your mind, did this, what you had identified,  
 3 call into question the consistent position of  
 4 the Post Office by this time, that the Horizon  
 5 System and the data it produced, was robust?  
 6 **A.** I believe on this occasion, the system -- the  
 7 Horizon System behaved as it should have done.  
 8 Reading that, my concerns were that we couldn't  
 9 actually see -- we could see the reversal but it  
 10 wasn't -- it didn't indicate that it wasn't done  
 11 by the postmaster, as opposed to a system  
 12 reversal.  
 13 **Q.** So just dealing with the "I do believe that the  
 14 system behaved as it should", what your report  
 15 describes is that a transaction reversal was  
 16 generated by Horizon without any input at all by  
 17 the subpostmaster, correct?  
 18 **A.** Correct.  
 19 **Q.** The transaction reversal was entirely a creation  
 20 of Horizon, it was a transaction done by,  
 21 generated by the system and nothing to do with  
 22 him, correct?  
 23 **A.** Correct.  
 24 **Q.** Yet the system appeared to suggest to the  
 25 outside world that the subpostmaster himself had

103

1 **A.** Yes.  
 2 **Q.** Can you recall following up this to see whether  
 3 or not the recommendations that you made in your  
 4 report at the foot of the page, on the left-hand  
 5 side, were followed?  
 6 **A.** I don't recall following that up.  
 7 **Q.** You say:  
 8 "I do believe the system has behaved as it  
 9 should ..."  
 10 I'm going to come back to that in a moment:  
 11 "... and I do not see this scenario  
 12 occurring regularly and creating large losses  
 13 [I'll come back to that too]. However, my  
 14 concerns are that we cannot clearly see what has  
 15 happened on the data available to us and this in  
 16 itself may be misinterpreted when giving  
 17 evidence and using the same data for  
 18 prosecutions.  
 19 "My recommendation is that a change request  
 20 is submitted so that all system created  
 21 reversals are clearly identifiable on both  
 22 Fujitsu and Credence."  
 23 **A.** Mm-hm.  
 24 **Q.** Are you aware whether that change request was  
 25 ever submitted?

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1 generated the reversal?  
 2 **A.** The basic system did, yes, but, once Gareth  
 3 provided the data, it proved that it had been  
 4 some kind of a failure in the, I believe it was  
 5 the Internet, the telecom link.  
 6 **Q.** How, in any possible world, is that the system  
 7 behaving as it should?  
 8 **A.** The -- I believe that Horizon created -- it  
 9 should have reported that the reversal was  
 10 a system reversal, not a -- is it an existing  
 11 reversal, I can't remember -- which was clearly  
 12 identified in the Fujitsu data but not on the  
 13 ARQ logs.  
 14 **Q.** There was no separate code --  
 15 **A.** Yeah.  
 16 **Q.** -- which identified that this was the system at  
 17 work and not the subpostmaster at work, correct?  
 18 **A.** That was a fault I found on this occasion, yes.  
 19 **Q.** Additionally, the Credence data was inadequate  
 20 to show what had actually happened. Indeed, not  
 21 only was the data inadequate, would you agree,  
 22 it made it look as if the subpostmaster had done  
 23 something --  
 24 **A.** Yes.  
 25 **Q.** -- that he or she had not done --

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1 A. Correct.  
 2 Q. -- and which the system had done?  
 3 A. Correct.  
 4 Q. In what respect is that a system behaving as it  
 5 should?  
 6 A. Because when we got the underlying data, it  
 7 actually showed what had happened.  
 8 Q. Yes, but that's a question of: how visible is it  
 9 if we pick away at it? My question is: how is  
 10 it the system behaving as it should, that it  
 11 created a transaction reversal of its own motion  
 12 without any input by the subpostmaster?  
 13 A. That was clearly my findings on the day.  
 14 Q. Yes, but why?  
 15 A. I can't see that -- that's what I believed at  
 16 the time, that the system had done -- how it  
 17 should.  
 18 Q. But looking back, how could it be? A system had  
 19 shown money paid back to the subpostmaster that  
 20 was invisible to him. In what respect is that  
 21 a system behaving as it should?  
 22 A. That -- well, I can only look at what -- I put  
 23 recommendations back in 2013, and that was  
 24 obviously my belief at the time.  
 25 Q. You say you do not see this scenario occurring

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1 second break of the morning there. It's 11.55  
 2 now, I wonder if we can break until 12.15?  
 3 **SIR WYN WILLIAMS:** Yes, we can.  
 4 But there's -- just that last sentence of  
 5 that document, Mr Beer, sorry to interrupt  
 6 again -- or not interrupt, add again.  
 7 You've been asked questions, Mrs Rose, by  
 8 Mr Beer about how this could be the system  
 9 working properly and you sought to answer them.  
 10 But I'm puzzled by your last sentence:  
 11 "My recommendation is that a change request  
 12 is submitted so that all system created  
 13 reversals are clearly identifiable on both  
 14 Fujitsu and Credence."  
 15 Now, my understanding of that language --  
 16 and I hope I'm not being to linguistic about  
 17 this -- is that you are acknowledging that  
 18 a system created request has occurred which  
 19 should not have occurred and so you want some  
 20 change made so that, if it happens again, it  
 21 will be clearly and obviously visible to anybody  
 22 who looks for it. Now, is that a fair  
 23 interpretation of what you've written?  
 24 A. I would say so, yes.  
 25 **SIR WYN WILLIAMS:** Right. Fine. Thank you.

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1 regularly. On what basis did you reach that  
 2 judgement?  
 3 A. I seem to remember vaguely that it was to do  
 4 with a failure in the connections between the  
 5 bill payments going through. So unless the bill  
 6 payments failed all the time, then it wouldn't  
 7 happen.  
 8 Q. How did you know whether they did or they  
 9 didn't?  
 10 A. Well, you wouldn't, would you, unless someone  
 11 like Lepton brought it up and said "I'm having  
 12 losses and these are the reversals that  
 13 I haven't done".  
 14 Q. And they commission a forensic accountant to  
 15 back them up even though it was only a loss of  
 16 just under £80? Did you make any recommendation  
 17 that a backwards look take place considering --  
 18 A. I --  
 19 Q. -- integrity of any evidence that had been given  
 20 in criminal prosecutions?  
 21 A. I don't recall doing on this occasion.  
 22 Q. Or the integrity of civil actions taken against  
 23 individual subpostmasters for debt recovery?  
 24 A. I wouldn't have done, I don't think, no.  
 25 **MR BEER:** Sir, I wonder whether we could take the

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1 Now we can have our break, Mr Beer.  
 2 **MR BEER:** In fact, we're going to follow that up  
 3 a little bit after the break too.  
 4 **SIR WYN WILLIAMS:** I thought you might. But  
 5 I couldn't resist it. I'm sorry.  
 6 **MR BEER:** Thank you very much, sir.  
 7 (11.55 am)  
 8 (A short break)  
 9 (12.15 pm)  
 10 **MR BEER:** Good afternoon, sir, and Mrs Rose can you  
 11 see and hear me?  
 12 **SIR WYN WILLIAMS:** Yes, thank you.  
 13 **THE WITNESS:** Yes, thank you.  
 14 **MR BEER:** You should still have on the screen two  
 15 documents. Can you confirm that's the case?  
 16 A. Yes.  
 17 Q. Thank you. I just want to revisit on the  
 18 left-hand side the conclusion of your report.  
 19 To start with, just to go back and give you the  
 20 opportunity to comment on this, the sentence  
 21 that says, "I do believe that the system has  
 22 behaved as it should"?  
 23 A. Yes.  
 24 Q. By that, are you meaning that, because there was  
 25 a power outage or an Internet failure or some

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1 communications difficulties, the transaction  
 2 wasn't completed --  
 3 **A.** Exactly.  
 4 **Q.** -- and the system generated a transaction  
 5 reversal --  
 6 **A.** Yes.  
 7 **Q.** -- and, in that respect, the system was behaving  
 8 as it should?  
 9 **A.** Yes.  
 10 **Q.** Overall, the system was not operating well,  
 11 though, in two respects, would this be right:  
 12 because firstly there shouldn't be that kind of  
 13 communication breakdown in which the need for  
 14 a transaction reversal arises; and, secondly,  
 15 there was a concern about the visibility of what  
 16 had happened, and the implication that this was  
 17 the postmaster's actions that had done it?  
 18 **A.** Yes.  
 19 **Q.** Is that yes to both parts of that question?  
 20 **A.** Yes, I don't think the issue was with the way  
 21 the Horizon behaved considering what happened;  
 22 the issue was with what the data presentation  
 23 and what we could see in the basic logs.  
 24 **Q.** Now then, on the right-hand side of the page  
 25 back in February, because you had already been  
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1 not seeing here. That's what the deeper issue  
 2 is?  
 3 **A.** I guess we just needed to understand was it  
 4 an issue? Were there other things that we  
 5 couldn't see?  
 6 **Q.** You say that you're happy to try for a change  
 7 request?  
 8 **A.** That's what I put in there, yes.  
 9 **Q.** By that, you mean a formal contractual  
 10 submission that would alter the relationship  
 11 between Fujitsu and the Post Office, concerning  
 12 the data that it was -- Fujitsu was obliged to  
 13 supply?  
 14 **A.** That's what I believed a change request would  
 15 have done, yes. I don't recall ever putting one  
 16 in, to be honest, but I --  
 17 **Q.** No, we're going hear evidence later in the  
 18 Inquiry from Mr Jenkins that no change was ever  
 19 submitted.  
 20 **A.** Fine, fair enough, yes.  
 21 **Q.** But that's in February you're saying that?  
 22 **A.** Yes.  
 23 **Q.** Then in June, your document on the left-hand  
 24 side of the same year, in the last paragraph, as  
 25 the Chairman has pointed out:  
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1 emailing Mr Jenkins about this, you concluded  
 2 this chain by telling senior managers, including  
 3 Angela van den Bogerd, that firstly you "Look at  
 4 this chain", but you say:  
 5 "I don't want to tackle one small issue when  
 6 we may need to challenge deeper issues with the  
 7 way we see data from Fujitsu/Credence".  
 8 **A.** Yeah.  
 9 **Q.** By that, were you meaning, "Look, on this  
 10 occasion, this was a transaction correction that  
 11 we couldn't see that it was system generated but  
 12 there may be other issues, deeper issues, that  
 13 we are also not sighted on"?  
 14 **A.** My understanding of that email -- I can't  
 15 remember writing it but my understanding of that  
 16 email is basically what you've just said. Yes,  
 17 we can see that one but we'd need to understand  
 18 were there other changes that needed to take  
 19 place, so are there other reasons why the system  
 20 does auto reversal so we could see everything  
 21 all in one go?  
 22 **Q.** So, although this may have been a transaction  
 23 reversal arising because of a communications  
 24 glitch, or whatever, you were making a broader  
 25 point that there's a class of data that we're  
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1 "My recommendation is that a change request  
 2 is submitted so that all system created  
 3 reversals are clearly identifiable on both  
 4 Fujitsu and Credence."  
 5 **A.** Yes.  
 6 **Q.** By "all system created reversals" is that the  
 7 wider or deeper issue that you were referring  
 8 to?  
 9 **A.** I would only have referred to the issues that  
 10 I was aware of, so I guess I would have only  
 11 been referring to the system failure, you know,  
 12 the system connection issues as opposed to  
 13 anything else.  
 14 **Q.** Well, here, you say that your recommendation is  
 15 that all system created reversals --  
 16 **A.** Yes.  
 17 **Q.** -- are visible to you?  
 18 **A.** Yes.  
 19 **Q.** This report is dated June 2013. At the time of  
 20 writing, you were obviously aware that  
 21 subpostmasters had been prosecuted on the basis  
 22 of Horizon data for over a decade before this?  
 23 **A.** Yes, potentially, yes.  
 24 **Q.** What do you mean, potentially?  
 25 **A.** I can't quote any that I was aware of, but  
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1 I would think I probably would have been aware  
 2 of some at that stage.  
 3 **Q.** You must have been aware that subpostmasters  
 4 were being audited, including by you, 1,400  
 5 times, and sometimes that turned into  
 6 a prosecution?  
 7 **A.** It did but, at that time, I wouldn't have known  
 8 of any particular --  
 9 **Q.** I'm not asking for names, I'm just saying you  
 10 would have been aware --  
 11 **A.** Yes.  
 12 **Q.** -- that subpostmasters would have been  
 13 prosecuted?  
 14 **A.** That's right.  
 15 **Q.** Yes?  
 16 **A.** Yes.  
 17 **Q.** They had been prosecuted on the basis of Horizon  
 18 data?  
 19 **A.** Yes.  
 20 **Q.** You were aware that civil actions had been  
 21 brought against subpostmasters also reliant on  
 22 the integrity of Horizon data?  
 23 **A.** Yes.  
 24 **Q.** The concern that you express here is about  
 25 future prosecutions, isn't it?

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1 **Q.** Can we look, please -- both those documents can  
 2 come down, please -- at POL00006357. Thank you.  
 3 This is an advice written by a man called Simon  
 4 Clarke, an in-house barrister employed by a firm  
 5 of solicitors called Cartwright King, who the  
 6 Post Office used at this time to prosecute many  
 7 criminal charges against subpostmasters. If we  
 8 just go to page 14, please, and look at the foot  
 9 of the page, you'll see that it's dated 15 July  
 10 2013, so a month or so after your report that  
 11 we've just looked at.  
 12 **A.** Mm-hm.  
 13 **Q.** If we just go back to paragraph 1, please.  
 14 Mr Clarke says:  
 15 "I am asked to advise [the Post Office] on  
 16 the use of expert evidence in support of  
 17 prosecutions of allegedly criminal conduct  
 18 committed by those involved in the delivery of  
 19 Post Office services to the public through sub  
 20 post office branches. By and large these  
 21 allegations relate to misconduct said to have  
 22 been committed by [subpostmasters] and/or their  
 23 clerks."

24 So that's the purpose of the document. If  
 25 we go to page 5, please, at paragraphs 14 and

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1 **A.** It's about being able to see the data --  
 2 **Q.** It's about looking to the future, isn't it?  
 3 **A.** Yes.  
 4 **Q.** You didn't make any recommendation to revisit  
 5 cases in the past, did you?  
 6 **A.** Not on this report, I didn't, no.  
 7 **Q.** Did you, other than on this report, make any  
 8 recommendations about revisiting past cases  
 9 reliant on Horizon data?  
 10 **A.** I can't recall if I did.  
 11 **Q.** Do you know whether that issue was raised by  
 12 Ms van den Bogerd or anyone else?  
 13 **A.** I wouldn't know.  
 14 **Q.** Was that raised with you?  
 15 **A.** Not that I can recall, no.  
 16 **Q.** Did you remain involved in work about Horizon  
 17 data integrity following the completion of this  
 18 report?  
 19 **A.** I'm not sure. I can't recall if I did or not.  
 20 **Q.** Well, in the three years that you'd got left to  
 21 serve until you left in 2016, what did you do?  
 22 **A.** I think the final two-plus years I dealt with  
 23 external crime reporting. So that would be  
 24 robberies, burglaries, gas attacks. So  
 25 completely away from this.

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1 15. Mr Clarke says:

2 "For many years both [Royal Mail Group] and  
 3 latterly [the Post Office] has relied upon [he  
 4 calls him Dr Gareth Jenkins] for the provision  
 5 of expert evidence as to the operation and  
 6 integrity of Horizon. Dr Jenkins describes  
 7 himself as an employee of Fujitsu Services  
 8 Limited and its predecessor company ICL since  
 9 1973. He holds a number of distinguished  
 10 qualifications in relevant areas. He has worked  
 11 on the Horizon project since 1996; he is  
 12 accordingly a leading expert on the operation  
 13 and integrity of Horizon.

14 "Dr Jenkins has provided many expert  
 15 statements in support of [Post Office Limited  
 16 and Royal Mail Group] prosecutions; he has  
 17 negotiated with and arrived at joint conclusions  
 18 and joint reports with defence experts and has  
 19 attended court so as to give evidence on oath in  
 20 criminal trials."

21 Then page 18, please -- sorry, page 8. My  
 22 mistake it's page 9. Starting with the heading,  
 23 "Helen Rose draft report dated 12 June", this  
 24 your report that's being referred to here:

25 "This report is based on a series of emails

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1 passing between Helen Rose, a [Post Office]  
2 Security Fraud Analyst. The emails appear to  
3 have been sent/received over the period of  
4 30 January to 13 February 2013. The essence of  
5 the contact is a 'question and answer' process  
6 between Helen Rose [and then he calls him  
7 Dr Jennings -- I think that's reference to  
8 Mr Gareth Jenkins] in circumstances where Helen  
9 Rose is enquiring into a reversals issue at the  
10 Lepton [office]. I again extract a number of  
11 paragraphs ..."

12 I'm not going to read those, we've looked at  
13 them already:

14 "27. Ms Rose's ultimate conclusion is that  
15 this is not an issue which suggests a failing of  
16 Horizon itself; rather it is an issue of data  
17 presentation, ie the problem appears to be that  
18 the ARQ logs do not distinguish between system  
19 generated and manual reversals, the answer being  
20 to create a new column in the ARQ log to  
21 facilitate that distinction. The report however  
22 does allude to Horizon issues: the 30 January  
23 email is suggestive of the proposition that  
24 Dr Jennings does not know what went wrong; and  
25 the 13 February comment is suggestive of the

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1 "Similarly, in those current and ongoing  
2 cases where Dr Jenkins has provided an expert  
3 witness statement, he should not be called upon  
4 to give that evidence. Rather, we should seek  
5 a different, independent expert to fulfil that  
6 role.

7 "Notwithstanding that the failure is that of  
8 Dr Jennings and, arguably, of Fujitsu, being his  
9 employer, this failure has a profound effect on  
10 [the Post Office] and [Post Office]  
11 prosecutions, not least because by reason of  
12 Dr Jenkins' failure, material which should have  
13 been disclosed to defendants was not disclosed,  
14 thereby placing POL in breach of their duty as  
15 a prosecutor.

16 "By reason of that failure ... there are now  
17 number of convicted defendants to whom the  
18 existence of bugs should have been disclosed but  
19 was not. Those defendants remain entitled to  
20 have disclosure of that material notwithstanding  
21 their convicted status."

22 I'm not going to read the rest of it.

23 Were you informed that in July 2013, the  
24 Post Office had been advised that Mr Jenkins had  
25 not complied with his duties to the court to the

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1 fact that Dr Jenkins knows of other Horizon  
2 Issues."

3 So your report featured as part of the  
4 material relied on to reach the conclusions that  
5 Mr Clarke did. If we go on to page 14,  
6 please -- sorry 13, my mistake -- and just look  
7 at "Conclusions":

8 "What does all this mean? In short, it  
9 means that Dr Jennings has not complied with his  
10 duties to the court, the prosecution or the  
11 defence."

12 Reading on, 38:

13 "The reasons as to why Dr Jenkins failed to  
14 comply with this duty are beyond the scope of  
15 this review. The effects of that failure  
16 however must be considered. I advise the  
17 following to be the position:

18 "Dr Jenkins failed to disclose material  
19 known to him but which undermines his expert  
20 opinion. This failure is in plain breach of his  
21 duties as an expert witness.

22 "Accordingly Dr Jenkins' credibility as  
23 an expert witness is fatally undermined; he  
24 should not be asked to provide evidence in any  
25 current or future prosecution.

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1 prosecution or the defence?

2 **A.** No.

3 **Q.** Was that brought to your attention in the  
4 remaining three years of your service with the  
5 Post Office?

6 **A.** No.

7 **Q.** Was there discussion, after this date in July  
8 2013, that the Post Office had been advised that  
9 Mr Jenkins was in breach of his duty as  
10 an expert witness --

11 **A.** No, not that I can recall.

12 **Q.** -- and that he couldn't provide evidence in any  
13 current or future prosecutions?

14 **A.** Not that I can recall, no.

15 **Q.** This must have been -- or would you agree that  
16 this is quite significant news in the Security  
17 team, isn't it?

18 **A.** Yes.

19 **Q.** It was in part based on your June 2013 report?

20 **A.** It appears to be, yes.

21 **Q.** Do you remember whether the contents of your  
22 report created quite a stir at the time in the  
23 Security department?

24 **A.** Not -- no, not really. I can remember sending  
25 it through line managers but I don't know who

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1 saw it or what happened with it.  
 2 **Q.** Sorry, just picking you up on that last answer,  
 3 you said you can remember sending it through  
 4 line managers. Who would that be, the June '13  
 5 report?  
 6 **A.** I'd have to go back over the emails to see who  
 7 was line manager and who I sent it on to.  
 8 I don't know where it's forwarded on after that,  
 9 by anybody.  
 10 **Q.** Were you ever made aware, in the remaining three  
 11 or so years that you were in the Post Office,  
 12 that your report had had these consequences?  
 13 **A.** No.  
 14 **Q.** Was the last thing that you therefore heard of  
 15 in relation to your report the submission of it,  
 16 and that was the end of the matter?  
 17 **A.** From memory, yes.  
 18 **MR BEER:** Thank you very much, Mrs Rose, they're the  
 19 only questions that I ask of you.  
 20 Sir, I know that at least one other Core  
 21 Participant has some questions to ask. In fact,  
 22 only one Core Participant has questions to ask.  
 23 **SIR WYN WILLIAMS:** All right. Well, let those  
 24 questions be put, then, please.  
 25 **MR BEER:** Thank you. It's the Hodge Jones & Allen  
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1 Yes?  
 2 **A.** Yes.  
 3 **Q.** If we scroll down, we can see that he covers the  
 4 content of your witness statement. He's about  
 5 to talk to you about your witness statement. He  
 6 says in paragraph 1 that you're  
 7 an investigations manager, and so forth, and  
 8 describes that you've moved. But if we go down  
 9 a bit further and we go to the top of page 2, he  
 10 says, summarising what you've obviously said to  
 11 him:  
 12 "In layman's terms her conclusions were that  
 13 Mr Castleton was fiddling the books. She had  
 14 never seen the Horizon System cause the problems  
 15 that Mr Castleton said it was causing. She  
 16 thought in her words that he was 'shifty'.  
 17 Do you recall saying those sorts of opinions  
 18 to Mr Dilley?  
 19 **A.** I can't recall that conversation whatsoever.  
 20 **Q.** If we go to the final paragraph as well:  
 21 "My impression of Helen is that  
 22 understandably her memory has faded over time  
 23 and that she will need to rely heavily upon her  
 24 audit to refresh her memory of events. She  
 25 doesn't remember some details that we would  
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1 team. I don't know if it is Ms Page. It is  
 2 Ms Page. Thank you.  
 3 **Questioned by MS PAGE**  
 4 **MS PAGE:** Thank you. I ask questions on behalf of  
 5 Lee Castleton, amongst other subpostmasters in  
 6 the Inquiry.  
 7 Now, we have understood from your witness  
 8 statement that you moved to the Security team in  
 9 2004, so not long after the audit of the Marine  
 10 Drive branch; is that right?  
 11 **A.** Correct, yes.  
 12 **Q.** By the time of the trial and preparing your  
 13 witness statement, you had been there in the  
 14 Security team for about two years?  
 15 **A.** Yes.  
 16 **Q.** Could we take a look, please, at POL00070763.  
 17 This is a phone note by Stephen Dilley, the  
 18 solicitor who acted for the Post Office in the  
 19 trial of Lee Castleton. He has made this note  
 20 having had a telephone conversation with you.  
 21 We can see that there at the top:  
 22 "SJD3" --  
 23 **A.** Yes.  
 24 **Q.** -- "having a conversation with Helen Rose (née  
 25 Hollingworth) ..."  
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1 like, for example, about how long the safe was  
 2 left open for and why and what Mr Castleton said  
 3 about it."  
 4 Just pausing there, that suggests, doesn't  
 5 it, that he actually spoke to you about the safe  
 6 being left open, and that was something which  
 7 we've now agreed was simply irrelevant and  
 8 wasn't what had happened. Your colleague had  
 9 ticked the box saying that the safe had been  
 10 left as it should, hadn't it?  
 11 **A.** I can't recall the audit at all. I'm sorry.  
 12 I can see what you're explaining but I don't  
 13 have any recollection of it.  
 14 **Q.** Well, what we can see here is that the solicitor  
 15 has actually asked you to consider the issue of  
 16 the safe. You had the same paperwork that we've  
 17 all seen and you knew that the safe had actually  
 18 been left as it should. Why didn't you tell the  
 19 lawyer that?  
 20 **A.** I can't recall.  
 21 **Q.** You appreciate, don't you, that your witness  
 22 statement, signed by you as true, said something  
 23 that was incorrect about that, didn't it?  
 24 **A.** It obviously said what I thought at the time but  
 25 I have no recollection of it at this moment in  
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1 time.

2 **Q.** All right. Well, the final sentence:

3 "However, she did come away with the strong

4 impression that he was fiddling."

5 Do you remember having that strong

6 impression?

7 **A.** I don't recall saying that, no.

8 **Q.** You, by then, were used to the way that the

9 Security team worked, weren't you?

10 **A.** After two years, probably, yes.

11 **Q.** You were used to assuming that subpostmasters

12 were "shifty" and "fiddling", weren't you?

13 **A.** Not all of them, no.

14 **Q.** That was the mindset you'd become accustomed to

15 in the Security team; is that right, Mrs Rose?

16 **A.** No, not all of them, no.

17 **Q.** It was a mindset of prejudice against the

18 subpostmasters, wasn't it?

19 **A.** No.

20 **Q.** And you were used to giving statements in

21 accordance with that mindset. That's why you

22 included everything which went against the

23 subpostmasters, even if it wasn't in your notes,

24 didn't you?

25 **A.** No.

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1 **A.** I can recall an incident; I can't recall the

2 details of the investigation.

3 **Q.** This happened only 10 years ago; we're not even

4 talking 20 or 30 years ago. You say that you

5 don't recall this?

6 **A.** No, I said I don't recall the incident -- the

7 actual investigation.

8 **Q.** Under the heading "Introduction and Terms of

9 Reference", we see that:

10 "This report details the findings from the

11 series of fact-finding interviews I completed

12 [this is Mr Colin Stretch] at the request of

13 [an HR officer]."

14 It says in italics below that:

15 "The Head of Fraud letter contains direct

16 allegations around the conduct of Mr Bradshaw

17 and Mrs Rose."

18 So you don't recall there being

19 an investigation into your conduct?

20 **A.** No.

21 **Q.** "These would appear proper to commit to

22 an internal fact-finding that should, to offer

23 maximum transparency, be conducted outside the

24 line."

25 Then we see below that, in the methodology,

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1 **Q.** That's why you included things which weren't in

2 your notes which would hurt Mr Castleton, such

3 as the supposed going out for having a drink at

4 lunchtime?

5 **A.** No.

6 **Q.** It comes from a mindset of prejudice, doesn't

7 it, Mrs Rose?

8 **A.** No.

9 **Q.** And you don't include anything in the statement

10 which might support the subpostmaster's case.

11 That's, again, the mindset of prejudice, isn't

12 it?

13 **A.** No.

14 **Q.** Let's look at another document briefly which

15 arises from your time in Security. If we could

16 bring that one down and bring up POL00086843.

17 This is a report following what was obviously

18 a tragic and serious incident when

19 a subpostmaster who was accused of fraud

20 committed suicide, a Mr Michael Mann. Do you

21 recall this?

22 **A.** I've read the documentation which is refreshed

23 but I don't recall the investigation, no.

24 **Q.** You don't recall an investigation into

25 a subpostmaster who killed himself?

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1 this gentleman who conducted the report says

2 that he conducted interviews with you, Helen

3 Rose, and Steve Bradshaw, in other words the two

4 people who had been accused of misconduct.

5 Then we see further down in that first

6 bullet point, that we can see at the moment --

7 yes, there we are:

8 "All seven people interviewed were

9 consistent in their responses that Bradshaw and

10 Rose had behaved professionally. This includes

11 the views of Bradshaw and Rose commenting on

12 their own as each other's behaviour. During my

13 interview with Bradshaw he stated he would not

14 have done anything differently, and that he

15 considered Helen Rose and himself to have

16 conducted themselves professionally."

17 So do you recall these interviews at all?

18 The interview between you and the man

19 investigating your misconduct?

20 **A.** I didn't know it was a misconduct. I can

21 remember there being an enquiry but I didn't

22 know it was a misconduct interview.

23 **Q.** Is this a situation where you and Mr Bradshaw

24 covered for each other?

25 **A.** Absolutely not.

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1 Q. You gave interviews to this chap investigating  
 2 the misconduct and you said that each of you had  
 3 behaved in a perfectly professional manner,  
 4 didn't you?  
 5 A. According to that, yes.  
 6 Q. Is that really how you thought of Mr Bradshaw  
 7 and the way that he conducted investigations?  
 8 A. Yes.  
 9 Q. Mrs Rose, just a couple more questions. Your  
 10 2013 report into the Lepton Branch -- sorry, the  
 11 document can come down -- your 2013 report into  
 12 the Lepton Branch, that was quoted again and  
 13 again over the next decade in support of the  
 14 subpostmasters, wasn't it?  
 15 A. I don't know. I didn't follow the case.  
 16 Q. They used it repeatedly throughout the Group  
 17 Litigation, didn't they?  
 18 A. I don't know. I didn't follow the case.  
 19 Q. Do you say that you never became aware that your  
 20 report was being used to help the  
 21 subpostmasters' cause?  
 22 A. No, I didn't follow the case at all.  
 23 Q. You literally are unaware. When did you first  
 24 become aware of this?  
 25 A. I'd heard that it had been used but I didn't

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1 A. Absolutely. I left Post Office seven and a half  
 2 years ago. I've no recollection of a lot of the  
 3 things.  
 4 Q. Is it really an unwillingness to face the  
 5 unpleasant truth that your conduct has helped  
 6 the Post Office to victimise many, many  
 7 subpostmasters --  
 8 A. Not at all.  
 9 Q. -- and Mr Castleton specifically?  
 10 A. No.  
 11 MS PAGE: Thank you.  
 12 SIR WYN WILLIAMS: That's it, is it, Ms Page?  
 13 MS PAGE: It is. Thank you, sir.  
 14 SIR WYN WILLIAMS: No one else wishes to ask  
 15 Mrs Rose any questions?  
 16 MR BEER: No, I don't think so, sir, unless you have  
 17 any questions.  
 18 SIR WYN WILLIAMS: No, I have no further questions.  
 19 Thank you, Mrs Rose, for making your witness  
 20 statement and for coming to give evidence.  
 21 I think that concludes today's session,  
 22 Mr Beer, yes?  
 23 MR BEER: It does, sir. We're back at 10.00 am  
 24 tomorrow, sir.  
 25 SIR WYN WILLIAMS: Yes. All right, well, I'll be

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1 know in what context it was used because  
 2 I didn't follow the case.  
 3 Q. When did you hear it was being used in this way?  
 4 A. I can't remember. I remember it being mentioned  
 5 but I didn't know why it was being used.  
 6 I didn't follow the case at all.  
 7 Q. Who was keeping you informed?  
 8 A. Oh, I have no idea. No idea when it might have  
 9 been mentioned in passing conversation. But  
 10 I didn't follow the case at all, so I don't  
 11 know. I didn't know how it was being used.  
 12 Q. Why didn't you follow the case?  
 13 A. Because I didn't. I'd left Post Office.  
 14 I didn't follow the case.  
 15 Q. Did you leave the Post Office because this  
 16 report was a black mark against your name?  
 17 A. No, I don't believe it was a black mark and  
 18 I didn't leave for that reason.  
 19 Q. Is it something that stalled your career?  
 20 A. No.  
 21 Q. Your memory failures throughout your evidence  
 22 and throughout your witness statement have  
 23 permitted you to avoid questions about your  
 24 conduct over some 20 years. Are these memory  
 25 failures really genuine, Mrs Rose?

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1 present at 10.00 am tomorrow, in spirit if not  
 2 in body. I'll see you tomorrow.  
 3 MR BEER: Thank you very much.  
 4 THE WITNESS: Thank you.  
 5 (12.47 pm)  
 6 (The hearing adjourned until 10.00 am the following  
 7 day)

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1	<b>I N D E X</b>	
2	HELEN ROSE (affirmed) .....	4
3	Questioned by MR BEER .....	4
4	Questioned by MS PAGE .....	122

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<p><b>MR BEER: [22]</b> 1/3 1/6 1/10 4/1 4/7 4/13 52/3 52/6 52/11 52/15 60/19 61/12 106/25 108/2 108/6 108/10 108/14 121/18 121/25 131/16 131/23 132/3 <b>MS PAGE: [3]</b> 122/4 131/11 131/13 <b>SIR WYN WILLIAMS:</b> <b>[21]</b> 1/5 1/9 3/23 4/4 4/10 51/25 52/4 52/13 60/16 60/25 61/7 61/11 107/3 107/25 108/4 108/12 121/23 131/12 131/14 131/18 131/25 <b>THE WITNESS: [4]</b> 52/7 52/14 108/13 132/4</p>	<p><b>12 [5]</b> 31/2 56/24 57/1 89/6 116/23 <b>12 June 2013 [1]</b> 89/9 <b>12,000 [1]</b> 79/7 <b>12.15 [2]</b> 107/2 108/9 <b>12.47 [1]</b> 132/5 <b>13 [2]</b> 117/25 118/6 <b>13 February 2013 [1]</b> 117/4 <b>14 [4]</b> 56/3 115/8 115/25 118/5 <b>14 January [1]</b> 81/20 <b>14 September 2006</b> <b>[1]</b> 56/13 <b>15 [2]</b> 84/9 116/1 <b>15 July [1]</b> 115/9 <b>15 June 2012 [1]</b> 22/3 <b>15 September [1]</b> 56/3 <b>15 September 2006</b> <b>[1]</b> 56/4 <b>15,200 [1]</b> 2/24 <b>16 [1]</b> 42/24 <b>17 [3]</b> 36/7 42/23 42/24 <b>18 [3]</b> 36/7 43/14 116/21 <b>19 [1]</b> 1/1 <b>19320 [1]</b> 90/22 <b>1973 [1]</b> 116/9 <b>1996 [1]</b> 116/11 <b>1997 [2]</b> 5/9 5/15 <b>1999 [3]</b> 6/9 6/17 6/25</p>	<p>115/10 117/4 119/23 120/8 120/19 129/10 129/11 <b>2014 [2]</b> 16/23 20/21 <b>2016 [4]</b> 11/13 11/17 35/8 114/21 <b>2021 [1]</b> 3/10 <b>2023 [3]</b> 1/1 3/11 4/23 <b>208 [1]</b> 55/25 <b>23 [1]</b> 15/4 <b>23 March [3]</b> 47/21 52/17 62/1 <b>23 March 2004 [3]</b> 38/24 40/4 41/3 <b>23,000 [2]</b> 2/16 2/22 <b>25 March [1]</b> 82/14 <b>25 March 2004 [2]</b> 47/17 47/19 <b>27 [1]</b> 117/14 <b>29 [1]</b> 79/3</p>	<p><b>6</b> <b>60,000 [1]</b> 81/24 <b>63 [4]</b> 45/3 53/14 54/12 59/12 <b>64 [2]</b> 41/11 42/16 <b>65 [6]</b> 41/13 42/17 47/10 61/17 61/18 69/13</p>	<p><b>6</b> <b>60,000 [1]</b> 81/24 <b>63 [4]</b> 45/3 53/14 54/12 59/12 <b>64 [2]</b> 41/11 42/16 <b>65 [6]</b> 41/13 42/17 47/10 61/17 61/18 69/13</p>	<p><b>7</b> <b>74,000 [1]</b> 81/21 <b>76-odd [1]</b> 91/5 <b>76.09 [3]</b> 90/24 92/10 92/16 <b>76.09p [1]</b> 92/1</p>	<p><b>8</b> <b>8 October 2021 [1]</b> 3/10 <b>8,000-odd [1]</b> 79/5 <b>8,243.10 [1]</b> 48/17 <b>8.00 [1]</b> 41/6 <b>8.00 am [2]</b> 48/2 62/4 <b>80 [3]</b> 90/25 91/5 106/16</p>	<p><b>8</b> <b>8 October 2021 [1]</b> 3/10 <b>8,000-odd [1]</b> 79/5 <b>8,243.10 [1]</b> 48/17 <b>8.00 [1]</b> 41/6 <b>8.00 am [2]</b> 48/2 62/4 <b>80 [3]</b> 90/25 91/5 106/16</p>	<p><b>9</b> <b>9.06 [1]</b> 1/2 <b>91 [1]</b> 36/8</p>	<p><b>9</b> <b>9.06 [1]</b> 1/2 <b>91 [1]</b> 36/8</p>	<p><b>A</b> <b>able [5]</b> 76/12 76/13 83/22 84/19 114/1 <b>about [62]</b> 1/7 1/23 5/8 7/21 14/7 15/6 17/25 22/16 28/3 29/12 34/3 35/1 35/4 36/1 37/20 37/23 38/6 38/7 38/17 39/2 44/6 54/10 55/17 56/4 57/22 59/9 60/4 60/17 67/13 68/5 71/21 71/25 81/17 82/8 88/2 89/17 89/19 94/1 94/6 94/23 96/10 96/18 100/6 100/6 100/10 107/8 107/16 109/15 110/1 113/24 114/1 114/2 114/8 114/16 122/14 123/4 123/5 124/1 124/3 124/5 124/23 130/23 <b>absolute [1]</b> 80/24 <b>Absolutely [3]</b> 85/3 128/25 131/1 <b>accept [2]</b> 83/2 88/16 <b>access [2]</b> 21/5 21/9 <b>accessed [3]</b> 9/19 21/13 37/15 <b>accordance [1]</b> 125/21 <b>according [3]</b> 55/1 75/9 129/5</p>	<p><b>A</b> <b>able [5]</b> 76/12 76/13 83/22 84/19 114/1 <b>about [62]</b> 1/7 1/23 5/8 7/21 14/7 15/6 17/25 22/16 28/3 29/12 34/3 35/1 35/4 36/1 37/20 37/23 38/6 38/7 38/17 39/2 44/6 54/10 55/17 56/4 57/22 59/9 60/4 60/17 67/13 68/5 71/21 71/25 81/17 82/8 88/2 89/17 89/19 94/1 94/6 94/23 96/10 96/18 100/6 100/6 100/10 107/8 107/16 109/15 110/1 113/24 114/1 114/2 114/8 114/16 122/14 123/4 123/5 124/1 124/3 124/5 124/23 130/23 <b>absolute [1]</b> 80/24 <b>Absolutely [3]</b> 85/3 128/25 131/1 <b>accept [2]</b> 83/2 88/16 <b>access [2]</b> 21/5 21/9 <b>accessed [3]</b> 9/19 21/13 37/15 <b>accordance [1]</b> 125/21 <b>according [3]</b> 55/1 75/9 129/5</p>	<p><b>accordingly [3]</b> 59/20 116/12 118/22 <b>account [6]</b> 48/15 48/22 78/1 78/9 81/23 91/5 <b>accountant [2]</b> 92/12 106/14 <b>accounting [8]</b> 12/21 15/12 15/15 80/12 80/25 81/8 82/24 84/10 <b>accounts [3]</b> 9/4 82/4 82/18 <b>accumulating [1]</b> 80/1 <b>accuracy [1]</b> 81/3 <b>accurate [6]</b> 9/15 49/8 51/7 55/1 55/23 76/14 <b>accused [3]</b> 84/23 126/19 128/4 <b>accustomed [1]</b> 125/14 <b>achieving [1]</b> 17/13 <b>acknowledging [1]</b> 107/17 <b>across [3]</b> 8/7 20/7 100/20 <b>act [1]</b> 58/17 <b>acted [1]</b> 122/18 <b>action [2]</b> 31/17 39/23 <b>actions [5]</b> 86/6 97/19 106/22 109/17 113/20 <b>activities [1]</b> 26/23 <b>activity [2]</b> 12/21 15/11 <b>actual [4]</b> 11/3 25/13 79/13 127/7 <b>actually [14]</b> 25/8 35/5 46/11 75/13 75/14 76/20 77/4 93/9 103/9 104/20 105/7 124/5 124/15 124/17 <b>adamant [4]</b> 48/8 63/1 63/7 92/17 <b>add [6]</b> 3/24 46/8 46/14 71/14 96/1 107/6 <b>added [4]</b> 46/18 48/21 54/15 68/2 <b>addition [2]</b> 72/1 72/12 <b>additional [1]</b> 12/18 <b>Additionally [1]</b> 104/19 <b>address [3]</b> 2/11 12/24 62/2 <b>addressed [2]</b> 19/4 46/4 <b>addressing [1]</b> 1/16 <b>adhered [1]</b> 53/23 <b>adjourned [1]</b> 132/6</p>																									
<p><b>1</b> <b>1 October 2012 [1]</b> 73/9 <b>1,400 [5]</b> 9/15 9/17 37/3 50/22 113/4 <b>1,500 [2]</b> 2/19 2/20 <b>1.24 [2]</b> 29/15 29/16 <b>1.30 [1]</b> 4/2 <b>10 [4]</b> 29/14 67/5 68/1 71/6 <b>10 May [1]</b> 4/22 <b>10 years [1]</b> 127/3 <b>10.00 [3]</b> 131/23 132/1 132/6 <b>10.20 [1]</b> 52/8 <b>10.37 [1]</b> 91/9 <b>10.40 [4]</b> 52/3 52/4 52/5 52/10 <b>10.42 am [1]</b> 90/23 <b>100 [2]</b> 42/3 56/23 <b>11 [1]</b> 68/14 <b>11 December [1]</b> 68/9 <b>11 January [1]</b> 40/10 <b>11 January 2006 [1]</b> 53/1 <b>11,752.78 [1]</b> 48/22 <b>11.55 [2]</b> 107/1 108/7</p>	<p><b>2</b> <b>2.00 pm [1]</b> 4/3 <b>2.15 [1]</b> 31/3 <b>20 [3]</b> 52/5 73/24 127/4 <b>20 minutes [1]</b> 51/23 <b>20 years [4]</b> 36/19 37/2 51/3 130/24 <b>2004 [11]</b> 7/1 10/6 38/24 40/4 41/3 47/17 47/19 52/18 64/14 66/15 122/9 <b>2006 [10]</b> 10/6 11/13 40/11 41/24 53/1 56/4 56/13 58/5 59/5 68/9 <b>2008 [1]</b> 12/18 <b>2009 [2]</b> 82/14 82/23 <b>2011 [2]</b> 79/4 80/2 <b>2012 [11]</b> 12/1 13/7 21/23 22/3 23/19 23/20 34/1 73/9 75/24 76/2 77/18 <b>2012/2013 [1]</b> 23/8 <b>2013 [18]</b> 16/22 19/25 20/21 23/8 88/20 89/6 89/9 93/14 99/15 105/23 112/19</p>	<p><b>3</b> <b>3 July [1]</b> 2/14 <b>3 March 2012 [1]</b> 12/1 <b>3 October 2006 [1]</b> 58/5 <b>3 pages [1]</b> 17/3 <b>3,000-odd [1]</b> 79/6 <b>3,509.68 [1]</b> 48/20 <b>3.91 [2]</b> 91/1 91/6 <b>30 [1]</b> 117/22 <b>30 August 2012 [1]</b> 75/24 <b>30 January [1]</b> 117/4 <b>30 years [1]</b> 127/4 <b>38 [1]</b> 118/12</p>	<p><b>3</b> <b>3 July [1]</b> 2/14 <b>3 March 2012 [1]</b> 12/1 <b>3 October 2006 [1]</b> 58/5 <b>3 pages [1]</b> 17/3 <b>3,000-odd [1]</b> 79/6 <b>3,509.68 [1]</b> 48/20 <b>3.91 [2]</b> 91/1 91/6 <b>30 [1]</b> 117/22 <b>30 August 2012 [1]</b> 75/24 <b>30 January [1]</b> 117/4 <b>30 years [1]</b> 127/4 <b>38 [1]</b> 118/12</p>	<p><b>4</b> <b>4 July [1]</b> 3/5 <b>4 October [1]</b> 90/23 <b>4 October 2006 [1]</b> 59/5 <b>4,030.97 [1]</b> 48/7 <b>4230.97 [1]</b> 62/20 <b>43 [2]</b> 48/6 62/19 <b>44 [1]</b> 17/8 <b>47 [3]</b> 41/10 42/15 48/17 <b>475 [1]</b> 69/8 <b>48 [3]</b> 41/11 42/16 43/20 <b>48-hour [1]</b> 86/19 <b>49 [1]</b> 48/20</p>	<p><b>4</b> <b>4 July [1]</b> 3/5 <b>4 October [1]</b> 90/23 <b>4 October 2006 [1]</b> 59/5 <b>4,030.97 [1]</b> 48/7 <b>4230.97 [1]</b> 62/20 <b>43 [2]</b> 48/6 62/19 <b>44 [1]</b> 17/8 <b>47 [3]</b> 41/10 42/15 48/17 <b>475 [1]</b> 69/8 <b>48 [3]</b> 41/11 42/16 43/20 <b>48-hour [1]</b> 86/19 <b>49 [1]</b> 48/20</p>	<p><b>5</b> <b>5 June 2023 [1]</b> 3/11 <b>5 September [1]</b> 1/11 <b>50,000 [1]</b> 81/23 <b>55 [1]</b> 17/9 <b>56 [1]</b> 44/18</p>	<p><b>5</b> <b>5 June 2023 [1]</b> 3/11 <b>5 September [1]</b> 1/11 <b>50,000 [1]</b> 81/23 <b>55 [1]</b> 17/9 <b>56 [1]</b> 44/18</p>	<p><b>6</b> <b>60,000 [1]</b> 81/24 <b>63 [4]</b> 45/3 53/14 54/12 59/12 <b>64 [2]</b> 41/11 42/16 <b>65 [6]</b> 41/13 42/17 47/10 61/17 61/18 69/13</p>	<p><b>6</b> <b>60,000 [1]</b> 81/24 <b>63 [4]</b> 45/3 53/14 54/12 59/12 <b>64 [2]</b> 41/11 42/16 <b>65 [6]</b> 41/13 42/17 47/10 61/17 61/18 69/13</p>	<p><b>7</b> <b>74,000 [1]</b> 81/21 <b>76-odd [1]</b> 91/5 <b>76.09 [3]</b> 90/24 92/10 92/16 <b>76.09p [1]</b> 92/1</p>	<p><b>8</b> <b>8 October 2021 [1]</b> 3/10 <b>8,000-odd [1]</b> 79/5 <b>8,243.10 [1]</b> 48/17 <b>8.00 [1]</b> 41/6 <b>8.00 am [2]</b> 48/2 62/4 <b>80 [3]</b> 90/25 91/5 106/16</p>	<p><b>9</b> <b>9.06 [1]</b> 1/2 <b>91 [1]</b> 36/8</p>	<p><b>A</b> <b>able [5]</b> 76/12 76/13 83/22 84/19 114/1 <b>about [62]</b> 1/7 1/23 5/8 7/21 14/7 15/6 17/25 22/16 28/3 29/12 34/3 35/1 35/4 36/1 37/20 37/23 38/6 38/7 38/17 39/2 44/6 54/10 55/17 56/4 57/22 59/9 60/4 60/17 67/13 68/5 71/21 71/25 81/17 82/8 88/2 89/17 89/19 94/1 94/6 94/23 96/10 96/18 100/6 100/6 100/10 107/8 107/16 109/15 110/1 113/24 114/1 114/2 114/8 114/16 122/14 123/4 123/5 124/1 124/3 124/5 124/23 130/23 <b>absolute [1]</b> 80/24 <b>Absolutely [3]</b> 85/3 128/25 131/1 <b>accept [2]</b> 83/2 88/16 <b>access [2]</b> 21/5 21/9 <b>accessed [3]</b> 9/19 21/13 37/15 <b>accordance [1]</b> 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