

Tuesday, 10 October 2023

1  
2 (10.00 am)  
3 MS PRICE: Good morning, sir. Can you see and hear  
4 us?  
5 SIR WYN WILLIAMS: Yes, I can, thank you.  
6 MS PRICE: May we please call Mr Hayward.  
7 SIR WYN WILLIAMS: Yes.  
8 ANDREW GEORGE HAYWARD (sworn)  
9 Questioned by MS PRICE  
10 MS PRICE: Could you confirm your full name, please,  
11 Mr Hayward.  
12 A. Andrew George Hayward.  
13 Q. You should have in front of you a hard copy of  
14 a witness statement in your name dated 11 May  
15 2023. Have you got that?  
16 A. Correct.  
17 Q. If you can turn to page 16 of that, please. Do  
18 you have a copy there with a visible signature?  
19 A. No, I've got my copy, apologies.  
20 Q. Do you have a copy of your witness statement  
21 that is signed?  
22 A. Yes.  
23 Q. Is that your signature on page 16?  
24 A. It is.  
25 Q. Are there any corrections you wish to make to

1

1 Q. For the purposes of the transcript, the  
2 reference is WITN08160100. There is no need to  
3 display that now. Thank you for coming to the  
4 Inquiry to assist it in its work and for  
5 providing the statement that you have. As you  
6 know, I will be asking questions on behalf of  
7 the Inquiry.  
8 A. Yes.  
9 Q. Today I'm going to be asking you about issues  
10 which arise in Phase 4 of the Inquiry, focusing  
11 on policy, procedure and practice of the Post  
12 Office in the investigation and prosecution of  
13 subpostmasters and their staff and the Post  
14 Office employees suspected of an offence.  
15 You were with the Post Office for 31 years  
16 after you joined in 1984; is that right?  
17 A. Yes.  
18 Q. Initially as a postman delivering the mail?  
19 A. Yes.  
20 Q. You became a counter clerk in 1985 --  
21 A. Yes.  
22 Q. -- and a supply chain manager in 1986?  
23 A. Yes.  
24 Q. You joined the Post Office Security Team in the  
25 year 2000 --

3

1 the statement?  
2 A. Only one, that latterly I sent via email  
3 regarding my position within the Security team  
4 towards the back end of my career.  
5 Q. Do you want to just clarify which part of the  
6 statement that is that you're correcting?  
7 A. Yes, so on point 9, where I'm titled Senior  
8 Security Operations Manager, 2010 to July 2015,  
9 although that was the title, such was the  
10 structure within the Security team that there  
11 was a Head of Security and four/five, we call  
12 them strands, direct reports. I was never  
13 a permanent direct report. I had the  
14 opportunity to apply for the vacancy when it  
15 came up on a number of occasions, chose not to  
16 because of personal logistical and financial  
17 reasons.  
18 However, I did agree to support the team by  
19 temporarily covering that vacancy, whilst a new  
20 incumbent was found. I don't remember the exact  
21 date. It was around 2012.  
22 Q. Subject to that correction, are the contents of  
23 your statement true to the best of your  
24 knowledge and belief?  
25 A. Yes.

2

1 A. Yes.  
2 Q. -- and held various roles in the Physical Crime  
3 Team over an eight-year period from then; is  
4 that right?  
5 A. Yes.  
6 Q. You became a Senior Security Fraud Risk  
7 Programme Manager in 2008 --  
8 A. Yes.  
9 Q. -- a role you held for two years; is that right?  
10 A. Yes.  
11 Q. Finally, you were a Senior Security Operations  
12 Manager from 2010 to July 2015 when you left the  
13 Post Office?  
14 A. Yes.  
15 Q. I use the word "a" because I think you've been  
16 clear in your correction you were not "the"  
17 Senior Security Operations Manager reporting to  
18 the Head of Security?  
19 A. No, I retained my Fraud Risk Programme Manager  
20 remit during that time.  
21 Q. Are we right to understand that the roles you  
22 held within the Physical Crime Team between the  
23 year 2000 and 2008 focused on external crime  
24 against the Post Office Network and supply  
25 chain, so did not cover investigation of Post

4

1 Office employees or subpostmasters and their  
2 staff?  
3 **A.** Correct.  
4 **Q.** During this period, were you involved in any  
5 criminal investigations into the conduct of Post  
6 Office employees, subpostmasters or their staff?  
7 **A.** Not that I can recall.  
8 **Q.** The first Physical Crime Team role you had was  
9 that of Security Advisor and you were later  
10 a team leader and temporary Senior Security  
11 Manager; is that right?  
12 **A.** Yes.  
13 **Q.** When you became a Security Advisor, did you have  
14 any prior experience in security, criminal law  
15 or investigation?  
16 **A.** No.  
17 **Q.** Was it common for Security team members to be  
18 drawn from other non-security areas of the  
19 business, rather than recruited externally for  
20 their security experience?  
21 **A.** I can only speak from my personal perspective,  
22 as in I was -- I had the opportunity to join the  
23 Security team because of my experience in the  
24 cash centre, cash-in-transit environment.  
25 I cannot recall, given the timescales, those

5

1 I know it was probably the earlier days, so when  
2 I was initially trained in 2000, in terms of  
3 interviewing and searches, that I was one of  
4 a number of team members that would conduct  
5 interviews if there was a suspect offender.  
6 As I became a team leader/managing other  
7 managers, there was less opportunity or  
8 requirement for me to undertake those interviews  
9 under PACE.  
10 **Q.** You say in your statement at paragraph 36 that:  
11 "All Investigators undertook in-house  
12 training which was provided by previously  
13 trained Security Managers."  
14 Are you referring here to initial training  
15 for an investigator?  
16 **A.** Yes, so when one joined the Security team, there  
17 was a set of training over number of weeks in  
18 terms of interviewing and searches -- that was  
19 the primary aim -- and all Security managers  
20 undertook that training in-house. I do believe  
21 it was Royal Mail Security, because it was Group  
22 Security and Royal Mail Security Managers  
23 undertook -- delivered that training.  
24 **Q.** Was this the type of training you received when  
25 you joined the Security team in the year 2000,

7

1 individuals that subsequently joined the  
2 Security team and where they came from. I know,  
3 in terms of my latter career, when I had  
4 obviously had been in the role a number of  
5 years, not only did we recruit from within the  
6 business, but also from external sources as  
7 well, ie ex-law enforcement, police officers.  
8 There were times, I would add, that I think  
9 because of headcount reduction and people were  
10 without a role, that if an opportunity arose to  
11 join another team within the business,  
12 ie Security, then that's where we would draw  
13 from, because they were within the business.  
14 But, in terms of names and numbers, I couldn't  
15 give you those details.  
16 **Q.** You have listed in your statement, in relation  
17 to your Physical Crime Team roles:  
18 investigation, statement taking and interviews  
19 under PACE. Did you undertake these activities  
20 for the whole period you were in the Physical  
21 Crime Team from 2000 to 2008?  
22 **A.** I would say no.  
23 **Q.** Can you recall which part of that period you had  
24 those roles?  
25 **A.** Not in terms of the eight-year time period.

6

1 that is in-house training provided by previously  
2 trained Security Managers?  
3 **A.** Yes.  
4 **Q.** Was the initial training provided to  
5 Investigators still being provided in-house by  
6 previously trained security managers when you  
7 left in 2015?  
8 **A.** I do believe so, yes.  
9 **Q.** Was the in-house training you received  
10 classroom-based learning?  
11 **A.** Yes.  
12 **Q.** To the extent that you can recall now, what  
13 criminal investigation topics were covered on  
14 that training?  
15 **A.** Could you rephrase? I'm not quite sure  
16 I understand that.  
17 **Q.** When you first did your initial training in  
18 2000, can you recall which criminal  
19 investigation topics were covered?  
20 **A.** If you mean regarding interviewing and  
21 searches -- they were the primary two areas that  
22 the investigation team covered and that was  
23 where the training was centred around --  
24 everybody had a -- volumes of manuals that  
25 referred to the elements of the legal world, in

8

1 terms of fraud, robbery, burglary, and the  
2 meanings of those, and that was where the  
3 training was centred around.

4 The only addition to that was searches,  
5 which, to my recollection, were covered at  
6 police locations, sometimes with the support of  
7 police officers because it was quite  
8 a specific -- and they had locations that were  
9 deemed suitable for training for searching.

10 **Q.** You say in your statement that you were trained  
11 over 20 years ago. Are you referring to that  
12 initial training that you had when you first  
13 took on a Security team role in the year 2000?

14 **A.** Yes.

15 **Q.** So is it right that you did not undertake any  
16 further training on criminal investigation after  
17 that initial training?

18 **A.** No, the only additional that I can recall was  
19 when I became a Senior Manager in the latter  
20 part of my career. There was a requirement to  
21 undertake -- as part of the Proceeds of Crime  
22 Act, there was a Senior Authorising Officer and  
23 formal external training was given to myself and  
24 other senior colleagues in that sphere.

25 **Q.** You say in your statement that, following  
9

1 training on any aspect of criminal prosecutions?

2 **A.** Other than the classroom training that  
3 I undertook? No.

4 **Q.** Were you trained on the test which should be  
5 applied by a prosecutor when deciding whether to  
6 prosecute someone?

7 **A.** Not to my recollection, no.

8 **Q.** Were you ever given any training on the test  
9 which should be applied by a prosecutor when  
10 deciding whether to prosecute someone, whether  
11 in the Physical Crime Team or in your later  
12 roles?

13 **A.** I believe in my later roles, when I temporarily  
14 stood in for the Head of the Department, I don't  
15 recollect the exact details because of the  
16 timespan but there was a requirement to  
17 undertake that particular role. I don't recall  
18 receiving any formal training, although there  
19 were other senior managers that had undertaken  
20 that that I would have sought advice from. And  
21 my understanding is that this was a devolved  
22 responsibility from the Head of Security.

23 But, in terms of formal training, no, I did  
24 not receive.

25 **Q.** Turning then to the role you had in 2008, that  
11

1 initial training, Investigators were supported  
2 by experienced Investigators on an ongoing  
3 basis. What form did that support take?

4 **A.** From recollection, it was where, obviously one  
5 receives training in any sphere and in any role,  
6 and there is a time for that individual to  
7 undertake the physical activity. In the same  
8 way as when I was trained on the counter, one  
9 had six to seven weeks, I think, of classroom  
10 training. One was then put on the counter to  
11 serve customers but with what I would term  
12 a chaperone, somebody who was far more  
13 experienced, that would support the said  
14 individual over a period of time -- the period  
15 of time I don't recollect -- but, in other  
16 words, they were supported to develop their  
17 skills.

18 **Q.** Were the experienced Investigators offering this  
19 support ever trained externally?

20 **A.** Not to my recollection, other than those that  
21 would have come in maybe from an external  
22 environment, ie law enforcement, but not within  
23 the business.

24 **Q.** During your initial training when you joined the  
25 Physical Crime Team, did you receive any  
10

1 of Senior Security Fraud Risk Programme Manager,  
2 you were in this role for two years until 2010;  
3 could you please tell us what your role  
4 entailed?

5 **A.** From 2008, when I was promoted into the role,  
6 there was a -- I would say, a shift change, in  
7 terms of the new Head of Security that came in  
8 adopting more what I would term a risk-based  
9 approach, rather than one covers all. So there  
10 was very much a desire to -- given the size of  
11 the Network, as well, circa 11,500 post offices,  
12 there was a requirement to look at analysis,  
13 data, obviously, and, rather than one sheet  
14 covers all, to look at the various levels of  
15 potential fraud in the various products and  
16 services and where one could make an impact.

17 So that wasn't -- it was more about  
18 protection and prevention than  
19 investigation/prosecution and that's where my  
20 role developed over -- because it was a role  
21 that didn't exist and, therefore, the role  
22 developed over the coming years with other  
23 stakeholders within the business.

24 **Q.** You say in your statement to the Inquiry at  
25 paragraph 8 that you were the senior lead on  
12

1 fraud risk. Did you have any experience of  
 2 fraud risk when you took on the role?  
 3 **A.** I had undertaken a degree, a master's degree, as  
 4 did a number of other Security Managers, which  
 5 was based -- although it was home based, it was  
 6 via Leicester University, sponsored by the  
 7 business and that was in security and risk  
 8 management. So that was my only, let's say,  
 9 formal area to add value to this role.  
 10 **Q.** In your statement, you also list crime and  
 11 offender profiling, crime analysis and  
 12 identification of "merging" -- but I think that  
 13 maybe was "emerging", that should read --  
 14 **A.** Yes.  
 15 **Q.** -- patterns or trends. Did you have any  
 16 qualification or experience relevant to these  
 17 areas when you took on the role?  
 18 **A.** Not personally. The wider team -- there was  
 19 a crime risk team, which subsequently became the  
 20 Grapevine team. There were individuals in there  
 21 that were -- delivered an analytical role. I'm  
 22 not aware of those individuals' qualifications.  
 23 I do remember one individual, I can't remember  
 24 his surname, who had qualifications in  
 25 analytical areas of work, but specifics I don't

13

1 you were directly reporting to by name?  
 2 **A.** I can't on the 2008/10, the role continued  
 3 through 2010 and onwards to 2015, the fraud risk  
 4 role. So I can recollect -- I'd be guessing,  
 5 which I don't really want to do, in terms of the  
 6 2008 and '10. With regards to other managers,  
 7 I could name a couple that I reported to.  
 8 **Q.** It was while you held this role that you were  
 9 asked by the Head of Security at the time -- and  
 10 that was John Scott, wasn't it --  
 11 **A.** Yes.  
 12 **Q.** -- to undertake a project to review security  
 13 investigation casework files to identify any  
 14 mitigating factors in better preventing fraud  
 15 and that's something which you address at  
 16 paragraph 10 of your statement to the Inquiry,  
 17 isn't it?  
 18 **A.** Yes.  
 19 **Q.** Can you tell us about what you describe in your  
 20 statement as one of the main findings of this  
 21 review, that subpostmasters with zero to five  
 22 years' service were more likely to commit fraud?  
 23 **A.** To take a step back, I was -- when I was given  
 24 the role of Senior Fraud Risk Manager and  
 25 subsequently completed my degree, one of my

15

1 recall.  
 2 **Q.** Were you given any training for the role?  
 3 **A.** Not in a formal sense.  
 4 **Q.** Did you have any involvement in fraud  
 5 investigations when you held this role?  
 6 **A.** At a front line no, I don't recall. That was  
 7 undertaken by the then Security  
 8 Managers/Investigators.  
 9 **Q.** To whom did you report when you were in this  
 10 role?  
 11 **A.** The Head of the Department, Security Operations,  
 12 which, over a period of time, was a number of  
 13 individuals. Only did I report to the Head of  
 14 Security through various lines of reporting, so  
 15 where there was a central monthly meeting of the  
 16 senior lead team, initially it was only the  
 17 direct reports. It was then expanded latterly,  
 18 in my career, to encompass the next level of  
 19 Security, Senior Security Managers, within the  
 20 team. So that group grew wider and, in terms of  
 21 reporting actions, activities, results, and also  
 22 linking into the wider businesses where I fed  
 23 into that team.  
 24 **Q.** So in that two-year period, I know you say who  
 25 held the role changed, but can you remember who

14

1 development areas that I saw, I was requested as  
 2 I mention in my statement, by the Head of  
 3 Security, John Scott, to undertake a review of  
 4 what I would call end-to-end, so the application  
 5 process through to the end of -- or the  
 6 termination of a contract, which didn't just  
 7 encompass the investigation element; it covered  
 8 all aspects within the business.  
 9 The zero to five-year came out.  
 10 I believe -- I have not got the report nor seen  
 11 it since I left the business but the report,  
 12 which I had assistance in terms of pulling the  
 13 data together, covered, I think, a year's  
 14 period, circa 250 cases, so the actual set of  
 15 data was quite wide spanning, and one of those  
 16 areas identified that particular comment there.  
 17 I don't have the percentage -- there would have  
 18 been a percentage levied to that in terms of  
 19 a greater number. I don't have those figures to  
 20 hand because I don't have the report nor do  
 21 I know where it exists any longer but that was  
 22 the reason for that particular comment.  
 23 **Q.** What was the hypothesis for why this might be?  
 24 What was the explanation being posited for that?  
 25 **A.** On recollection and memory, it was also linked

16

1 to the other part about the credit checking,  
 2 enhanced vetting, because the -- that I saw in  
 3 terms of observations and research we undertook  
 4 within the business, there was an application  
 5 process for new potential subpostmasters.  
 6 Within that, there were various elements in  
 7 terms of checks, there was a business plan,  
 8 et cetera, that were undertaken, but because of  
 9 the investigations and also the financial  
 10 recovery investigations, there were elements  
 11 within those that we uncovered that, for  
 12 example, if a potential new subpostmaster were  
 13 to be successful, they would have submitted  
 14 a business plan, financial affairs that they  
 15 could take on the Post Office and what that  
 16 looked like.

17 However, because the Post Office had not got  
 18 the ability to go any deeper in terms of  
 19 financial suitability, there were items where --  
 20 or, rather, cases where, if a subpostmaster did  
 21 not reveal they had other financial debt, let's  
 22 say, which was okay in one sense, but the Post  
 23 Office was blind to it. So, therefore, if, as  
 24 would a bank or a financial institution be able  
 25 to understand the wider piece of an applicant,

17

1 There was, further to that, the Banking and  
 2 Financial Services arena, together with credit  
 3 reference agencies, were in, what I discovered  
 4 through the research, a closed user group. In  
 5 other words, they were -- it's -- they were able  
 6 to use data, as they do now, in a proper manner.

7 There was another term called the  
 8 "principles of reciprocity", which was a bit of  
 9 a mouthful, but what it meant was that was the  
 10 guidelines that they were ruled to. Now, the  
 11 Post Office sat outside of that because it was  
 12 not a financial institution. However, there was  
 13 very much a desire that, through the Bank of  
 14 Ireland links, that it could, in whatever manner  
 15 was deemed appropriate, undertake enhanced  
 16 vetting, both pre and post-appointment.

17 I presented a paper, one calls it,  
 18 a two-page document, to the board on the  
 19 findings and the proposals which was given  
 20 concurrence. I then proceeded, probably for the  
 21 next year/18 months of various discussions with  
 22 stakeholders -- I don't recall every single  
 23 stakeholder but that was within and outside of  
 24 the business -- every step of the way there was  
 25 very much a positive feedback.

19

1 then that would possibly question the  
 2 suitability of that person because the belief  
 3 was that anybody who came into the business  
 4 wanted to run a business, absolutely.

5 **Q.** At the time, did anyone consider the relevance  
 6 that someone with zero to five years' service  
 7 would be less familiar with the Horizon System  
 8 than their longer serving counterparts?

9 **A.** I don't believe so, no.

10 **Q.** You say in your statement that one of the things  
 11 which was being considered at this point was  
 12 enhanced credit checks and you've just referred  
 13 to those. Can you explain the thinking behind  
 14 that, as in what would that achieve?

15 **A.** So, as I said previously, the Post Office did  
 16 not carry out -- once a subpostmaster was in  
 17 place, an individual was in place, there were no  
 18 further ongoing checks made in terms of the  
 19 financial affairs of an individual. Throughout  
 20 the -- following the initial report -- and  
 21 I don't recall the exact finite detail in terms  
 22 of discussing the elements, but there was a --  
 23 we came to discussion with the Bank of Ireland  
 24 because the Post Office sought its financial  
 25 services through the Bank of Ireland.

18

1 So it wasn't me, it was a number of  
 2 stakeholders that came on board. Because of the  
 3 sheer size of the business and probably the  
 4 complexity of bringing this to the table, when  
 5 I left the business in 2015, we hadn't actually,  
 6 for want of a better term, got it over the line  
 7 or agreed a formal process. I do not know if it  
 8 ever got there.

9 **Q.** You refer at paragraph 11 of your statement to  
 10 a document entitled "Former subpostmaster  
 11 end-to-end debt review", and this was dated  
 12 December 2009. May we have that on screen,  
 13 please. The reference is POL00084977. You say  
 14 at paragraph 44 of your statement that both your  
 15 role and the Security team's role in relation to  
 16 recovery of debt from former and current  
 17 subpostmasters was to deploy the fraud risk  
 18 programmes to identify, prevent, investigate  
 19 and, where required, recover assets through  
 20 criminal prosecutions and financial recovery.

21 In relation to this document, you say that  
 22 in 2009 the current security fraud risk and  
 23 investigation activities fed into the wider  
 24 business activities on subpostmaster debt, to  
 25 identify future and enhanced processes to better

20

1 manage this. What information did you provide  
2 that fed into this report?

3 **A.** I don't remember the finer detail of that  
4 report, given the 2009. I am aware of the  
5 individual, Mr Greening, who worked out of  
6 Chesterfield. My recollection would have been  
7 the fraud risk activities, in terms of the  
8 programmes, would have fed into that, in terms  
9 of the areas of product that we were looking at,  
10 in terms of reducing losses, but also wider  
11 losses within the business, both in terms of  
12 fraud and external crime.

13 **Q.** You say that the overall ownership of this  
14 review and report was led by the Network Back  
15 Office Efficiency Programme; is that right?

16 **A.** That was my understanding, yes.

17 **Q.** We can see that the front page of this report  
18 shows a person struggling to hold up the word  
19 "Debt" which is many times larger than the  
20 person depicted. Do you know who was  
21 responsible for selecting this image for the  
22 front of the report?

23 **A.** No.

24 **Q.** Could we turn, please, to page 2 of this  
25 document. We have here the "Introduction",

21

1 and future state where applicable.

2 "Project report including current state,  
3 issues and recommendations.

4 "[Thirdly] A 'Results Chain' identifying  
5 potential initiatives and their link to desired  
6 strategic outcomes."

7 Could we go over the page, please, to the  
8 "Management Summary", the first paragraph reads  
9 as follows:

10 "This study is part of a much wider review  
11 which includes current and former subpostmaster  
12 debt, Multiple Partner debt and Crown Office  
13 losses. The focus of this review is former  
14 subpostmaster debt. The objectives of this  
15 review are to reduce future debt and improve  
16 debt recovery processes."

17 Going over the page, please, again, to the  
18 last paragraph of this "Management Summary",  
19 please:

20 "There is wide recognition and agreement  
21 that all stakeholders currently involved in the  
22 existing process will play an active part in  
23 future activities to both reduce future debt and  
24 improve debt recovery processes."

25 The stakeholders were set out in a little  
23

1 "Objectives" and "Scope". Starting with the  
2 "Introduction":

3 "As part of the Back Office Efficiency  
4 Programme a project was initiated in July 2009  
5 to review and document all end-to-end former  
6 subpostmaster debt activities and processes  
7 within Post Office Limited.

8 "Objectives

9 "To reduce future debt.

10 "To improve debt recovery processes.

11 "To acquire consensus across key  
12 stakeholders on the short, medium and longer  
13 term initiatives to both reduce future debt and  
14 improve debt recovery processes.

15 "Scope

16 "Subpostmasters that are no longer agents  
17 with the Post Office, but still owe the monies  
18 in the form of debt to Post Office Limited.

19 "All key stakeholders involved in the e2e  
20 debt provides including: Product and Branch  
21 Accounting, Contract Advisors, Network Field  
22 Support, Security and Investigation, Human  
23 Resources, Network and Legal Services."

24 The "Key Deliverables" underneath:

25 "High level process maps including current  
22

1 more detail at pages 5 to 7 of this report.

2 Could we go, please, to page 5. We have here  
3 the "Network Field Support Team" and, further  
4 down the page, please, the "Product and Branch  
5 Accounting" team. Over the page, please, "Crime  
6 Risk (formerly Casework Team)" within the  
7 Security team; the "Investigation Team", within  
8 the Security team.

9 Over the page again, please, the "Financial  
10 Investigation Unit", in the Security team; the  
11 "Fraud Risk Team" within the Security team.

12 Over the page please, "Legal Services", both  
13 civil law and criminal law. Further down the  
14 page, please, "Contract Management, Network".

15 Over the page again, please. The last  
16 stakeholder is listed as "Human Resource".

17 Would it be fair to say that the Post Office  
18 placed considerable emphasis on trying to  
19 prevent theft and fraud?

20 **A.** Yes.

21 **Q.** Is it right that debt recovery was a major  
22 focus, not just of your role in 2009 but also of  
23 the various teams that at the Post Office who  
24 were responsible for criminal investigations?

25 **A.** As an observation, I would say yes.  
24

1 Q. The last role that you held before you left the  
 2 Post Office -- and you've explained that you  
 3 were, as you put it, stepping into this role --  
 4 the Senior Security Operations manager role, and  
 5 you say you held this role from 2010 until 2015.  
 6 Just to be clear, were you in that role for the  
 7 whole period and stepping up to a more senior  
 8 role at some points, or can you just clarify for  
 9 us --

10 A. Yes.

11 Q. -- what the period of time was?

12 A. So my recollection of that was the job title  
 13 changed, as titles changed within the business  
 14 in various other teams. From my recollection,  
 15 I was a Senior Fraud Risk Programme Manager from  
 16 2008 to 2015. That was my permanent role. The  
 17 job title may have changed but my  
 18 responsibilities remained pretty much the same.

19 It was during that period, as I mentioned  
 20 earlier, when incumbents left the business and  
 21 a new role was -- a new position or applicant  
 22 was sourced for that role did I agree in terms  
 23 of supporting the team and the business to step  
 24 into that role. As mentioned again, I don't  
 25 recall the exact dates in that timeline when

25

1 that --

2 A. John Scott, Head of Security.

3 Q. You have described the fairly wide-ranging  
 4 matters which fell within your remit when you  
 5 were in this role in your statement at  
 6 paragraph 9. If we could have that up on  
 7 screen, please. The reference is WITN08160100  
 8 and it's page 2 of that document, please, about  
 9 two-thirds of the way down the page,  
 10 paragraph 9.

11 So are we right to understand that the role  
 12 involved, firstly, management of operational  
 13 fraud risk programmes?

14 A. Yes.

15 Q. What was the aim of the operational fraud risk  
 16 programmes?

17 A. That was where areas that had been identified in  
 18 products and services and also in terms of the  
 19 cash management arena, in terms of supplying  
 20 cash to branches, through analysis of  
 21 information to hand, were areas that were deemed  
 22 at greater risk in terms of loss. And so,  
 23 therefore, programmes were developed with other  
 24 stakeholders within the business. So there was  
 25 a unified approach which I didn't feel was there

27

1 I did.

2 I know one was around the 2012 area because  
 3 one of the previous Heads of the Department had  
 4 left and, whilst they were sourcing another  
 5 suitable applicant, that was probably the  
 6 longest time I stepped into that role. But  
 7 I was still -- and at one stage I did become  
 8 the -- a temporary Head of the Department, but  
 9 it was only temporary. I then stepped back into  
 10 my fraud risk role. I hope that makes that  
 11 clear.

12 Q. For the periods of time when you were not  
 13 stepping into this role, who held that position?

14 A. The two that I can remember, there was  
 15 a gentleman called Mr Iain Murphy and then,  
 16 following that, my last line manager was Mr Rob  
 17 King. There were others before that but I would  
 18 be guessing at individuals who had been in that  
 19 role but I can't categorically say, given the  
 20 timeline, that they would have been my line  
 21 manager at the time. So I do know names that  
 22 were in the business but whether they were my  
 23 direct line manager, I could not recall.

24 Q. When you were in the role of Senior Security  
 25 Operations Manager, who did you report to during

26

1 before.

2 Q. So was this a continuation of your role that you  
 3 had held before 2010?

4 A. I don't believe it was formalised before  
 5 I became a Senior Fraud Risk Manager. So  
 6 because I wasn't in that arena, in that area of  
 7 work, I'm sure there were probably -- each  
 8 individual stakeholder might have been  
 9 undertaking activities to recover monies,  
 10 ie Product & Branch Accounting had a former  
 11 subpostmaster debt to deal with but I was not  
 12 aware of what they did and how they went about  
 13 that.

14 But when I became Senior Fraud Risk, I don't  
 15 remember that moment in time, but because there  
 16 were links, but I would call it not formalised  
 17 links, that is where we developed that process  
 18 for better management, so everybody understood  
 19 what the other person was doing, and pool  
 20 resource.

21 Q. The second aspect of your role that you describe  
 22 here is management of fraud investigations and  
 23 you've listed number of things which this  
 24 included: criminal prosecutions; support of  
 25 conduct and contractual matters; and conduct of

28

1 investigations, including training and  
2 development.

3 Just to be clear, in this role, were you  
4 conducting investigations yourself or managing  
5 those who conducted investigations?

6 **A.** Managing those that conducted.

7 **Q.** What was your role in relation to the training  
8 and development of those conducting  
9 investigations?

10 **A.** From recollection, the initial, as we said  
11 earlier, training, was conducted by others. So  
12 that was when a person came into the Security  
13 team. Latterly, I don't recollect dates and  
14 times, but there was a general desire to, as in  
15 all walks of one's career, improve one's  
16 professionalism. There were various activities  
17 undertaken to review the current, let's say,  
18 investigation processes and support people in  
19 terms of their daily work routines, but also to  
20 improve their professionalism, in other words to  
21 continue meeting the challenges.

22 Now, I was one of a number of senior  
23 managers that -- we had what was called --  
24 I think it was an advanced development programme  
25 or a development programme, which was there to

29

1 "Manage and develop a team [if we can go  
2 over the page please] of direct reports and  
3 Security Managers to manage and mitigate fraud  
4 and external crime risks."

5 Can you remember now who those direct  
6 reports were?

7 **A.** Not in total. I can give you a couple of names  
8 that I remember managing and having associated  
9 with was -- Dave Posnett was one; Helen  
10 Dickinson would have been another team leader;  
11 a gentleman, Andrew Daley, was also a team  
12 leader; Darryl Kennedy was a team leader; and,  
13 in Northern Ireland, Keith Gilchrist was also  
14 a team leader. Those were the names I can  
15 recollect at this moment in time.

16 **Q.** The last part of your role, which you cover in  
17 this paragraph is being Senior Authorising  
18 Officer for POCA restraint and confiscation  
19 orders. What did this part of your role  
20 involve?

21 **A.** So there were a number of senior security  
22 managers that -- I think it was at the behest of  
23 the Head of Security, John Scott, required that  
24 we widen the pool of those able to become SAOs,  
25 Senior Authorising Officers. I recollect --

31

1 try and support, let's say, future people who  
2 wanted to improve themselves in the business and  
3 get on in the business, for want of a better  
4 word. But those are all -- they were in-house  
5 but supported, to my recollection, in some  
6 cases, by external legal support, ie Cartwright  
7 King, who delivered a classroom training.

8 I don't remember the details of that but it  
9 would have been around the investigation  
10 processes.

11 **Q.** Do you remember when Cartwright King started  
12 providing that training?

13 **A.** No.

14 **Q.** What was your role in relation to criminal  
15 prosecutions?

16 **A.** From recollection, I wasn't directly involved in  
17 the investigation and case collation of  
18 a particular case. There were reviews in terms  
19 of ongoing cases and where they stood, both with  
20 team leaders and at a senior level, but I didn't  
21 get involved directly in the cases because of  
22 the other operational functions that  
23 I undertook.

24 **Q.** You refer in your statement, and this at the  
25 bottom of the page here, to:

30

1 I don't recollect the exact time and date but we  
2 undertook formal training which I believe --  
3 I'll stand corrected -- was carried out by the  
4 NPIA, National Police Improvement Agency.  
5 I will stand corrected on that. That was  
6 an external course to enable us to carry out the  
7 duties of SAOs to support the Financial  
8 Investigators.

9 **Q.** In relation to training for the various aspects  
10 of your last role with the Post Office, when you  
11 were stepping into this role, could we have on  
12 screen, please, POL00105008.

13 If we can have, please, the first tab there.

14 Thank you. This appears to be a training and  
15 development record and request relating to you;  
16 is that right?

17 **A.** Yes.

18 **Q.** At the time it was created, Rob King was listed  
19 as your line manager. Does that help you to  
20 date this document at all?

21 **A.** On the basis that Mr King came into the business  
22 around 2012, I would say it is there or  
23 thereafter, possibly a number of months later  
24 but in and around that period of time.

25 **Q.** There are a number of operational skills in the

32

1 top box -- sorry, operations skills. I just  
 2 want to go through these, please.  
 3 "Network/Supply Chain Security Inspections",  
 4 can you just explain what that related to,  
 5 please?  
 6 **A.** That was where, because of my previous  
 7 experience in the cash centre environment, there  
 8 were a lot of procedural elements because of the  
 9 high security environment, and my recollection  
 10 of that is that we would, on an agreed time,  
 11 conduct, basically, an audit of the said cash  
 12 depot or cash processing centre to ensure the  
 13 procedures and systems were in place to protect  
 14 individuals in the business.  
 15 **Q.** Then we have "PACE Interviewing".  
 16 **A.** So that was where I had undertook PACE training  
 17 when I became a Security Manager.  
 18 **Q.** Was that your initial training --  
 19 **A.** Yes.  
 20 **Q.** -- in 2000?  
 21 **A.** Yes.  
 22 **Q.** "Search Trained" underneath?  
 23 **A.** The same as the one above.  
 24 **Q.** So initial training in 2000?  
 25 **A.** Yes.

33

1 criminal investigations; is that right?  
 2 **A.** Yes.  
 3 **Q.** When you were stepping into the role of Senior  
 4 Security Operations Manager, your role involved  
 5 management of fraud investigations, including  
 6 criminal prosecutions. You had direct reports  
 7 who were responsible for criminal  
 8 investigations, which resulted in criminal  
 9 prosecutions brought by the Post Office?  
 10 **A.** Yes.  
 11 **Q.** I have some questions therefore about your  
 12 understanding of the Post Office's role,  
 13 particularly as a prosecutor. Could we have,  
 14 please, page 4 of Mr Hayward's statement on  
 15 screen, paragraph 12, thank you. You say here:  
 16 "In respect of the period of time I worked  
 17 in the Security team, to the best of my  
 18 knowledge POL/Royal Mail had Direct Public  
 19 Authority (DPA) status to enable them to  
 20 undertake criminal investigations."  
 21 Who told you about this Direct Public  
 22 Authority status?  
 23 **A.** From memory, I believe that would have been  
 24 something from documents previously undertaken  
 25 by Royal Mail Corporate Security. I couldn't

35

1 **Q.** Then we have "POCA 2002 -- Financial  
 2 Investigations". Is that the training that you  
 3 mentioned earlier?  
 4 **A.** The SAO, yes, that would be my understanding,  
 5 because I wasn't trained in terms of the  
 6 financial investigation side of it.  
 7 **Q.** What does "Existing skill" here mean?  
 8 **A.** On reading this, I would take it that it meant  
 9 one either had a working knowledge or had been  
 10 trained within that sphere.  
 11 **Q.** Was it any part of the definition of existing  
 12 skill that the person had had training in the  
 13 area recently?  
 14 **A.** Unless it had been delivered recently, no, there  
 15 were no -- looking at that, there were no dates  
 16 and times attached to that.  
 17 **Q.** So it just means the person had been trained at  
 18 some point in the past?  
 19 **A.** Correct.  
 20 **Q.** Turning, please, to the Post Office's role as  
 21 an investigator and prosecutor, you say in your  
 22 statement at paragraph 12 that you had no direct  
 23 involvement in the practice or rationale of  
 24 undertaking private prosecutions. But when you  
 25 were in the Physical Crime Team, you conducted

34

1 remember an exact person or individual that had  
 2 said that to me. It was just an understanding.  
 3 **Q.** What did you understand this to mean?  
 4 **A.** From my personal self, that the Post  
 5 Office/Royal Mail was able to undertake  
 6 prosecutions.  
 7 **Q.** Are you aware now that when the Post Office  
 8 reviewed the position in 2013, it was unable to  
 9 identify any statutory basis for the Post Office  
 10 bringing prosecutions and concluded that it did  
 11 so in a purely private capacity?  
 12 **A.** I didn't know at the time but I have seen that  
 13 in documentation since.  
 14 **Q.** At any point that you had involvement in Post  
 15 Office investigations and prosecutions, did you  
 16 understand that the Post Office was unusual in  
 17 that it was the alleged victim of the crimes it  
 18 investigated, it investigated such suspected  
 19 crimes itself and it decided whether to  
 20 prosecute such suspected crimes itself?  
 21 **A.** At the time I didn't think it unusual, because  
 22 it had already undertaken those activities for  
 23 a number of years and continued to do so. So  
 24 no, I didn't.  
 25 **Q.** At the time, were you conscious of the risks

36

1 that may arise on account of the Post Office  
2 being simultaneously victim, investigator and  
3 prosecutor?

4 **A.** I wasn't at the time, no.

5 **Q.** When you look at it now, do you see the risk  
6 that might attach, in particular, to the Post  
7 Office's disclosure obligations as a prosecutor?

8 **A.** I can understand your question, yes.

9 **Q.** Or its use of expert evidence?

10 **A.** Yes.

11 **Q.** Were these risks ever discussed within the  
12 Security team, as far as you are aware?

13 **A.** Not to my knowledge, no.

14 **Q.** Were they acknowledged in any Post Office or  
15 Royal Mail policy that you have seen?

16 **A.** No.

17 **Q.** In your view, did those charged with  
18 investigations appreciate or understand this  
19 unusual position of the Post Office?

20 **A.** I think it would be difficult for me to give  
21 a broadbrush -- I could answer yes but each  
22 individual would have their own answer. So  
23 I guess I'm being asked to read into somebody's  
24 mind, which I can't do.

25 **Q.** Did you consider, at the time you worked within

37

1 to the longevity of time.

2 **Q.** But do you recall covering the prosecution  
3 policy in your initial training in 2000?

4 **A.** I don't recall, no.

5 **Q.** May we have on screen, please, the December 2007  
6 "Royal Mail Group Limited Criminal Investigation  
7 and Prosecution Policy". The reference is  
8 POL00030578. This is one of the policy  
9 documents relating to criminal investigations  
10 and prosecutions, to which you were referred by  
11 the Inquiry when you were asked to provide  
12 a witness statement.

13 You've listed this, among a number of  
14 documents, in the footnote to paragraph 14 of  
15 your statement. It is one of the documents you  
16 say in paragraph 14 that you have no knowledge  
17 of. To be clear, had you seen the policy  
18 document, which is on screen, before it was sent  
19 to you for the purposes of preparing your  
20 witness statement by the Inquiry?

21 **A.** I don't have a recollection of that document.

22 **Q.** Can we look, please, at point 4 and page 4 of  
23 this document. It says here:

24 "This Policy is published on the Royal Mail  
25 Intranet site as policy No S2."

39

1 the Security team, the extent to which  
2 prosecutions served the Post Office's broader  
3 commercial interests, such as the reduction of  
4 debt and the increase of income?

5 **A.** Could you just rephrase that, sorry?

6 I didn't --

7 **Q.** When you were working in the Security team, did  
8 you consider at all the extent to which  
9 prosecutions were in the Post Office's broader  
10 commercial interests, such as the reduction of  
11 debt and the increase of income?

12 **A.** No.

13 **Q.** I'd like to turn now, please, to criminal  
14 investigation and prosecution policies. When  
15 you first started in the Physical Crime Team in  
16 the year 2000, were you given a copy of any  
17 document setting out the Post Office prosecution  
18 policy?

19 **A.** I don't have recollection of it, given the  
20 23-year time span. I recollect elements of  
21 training and I was always aware that there was  
22 a central hub for policies with regards to the  
23 specific training and documents referred to.  
24 They may well have been referred to in the  
25 training but I have no distinct recollection due

38

1 When you worked within the Security team,  
2 did you have access to the Royal Mail intranet  
3 site?

4 **A.** From recollection, yes. But specifics and  
5 detail, I don't remember.

6 **Q.** To the best of your recollection, was this  
7 policy drawn to your attention when you were in  
8 the role of Fraud Risk Programme Manager, a role  
9 you started in 2008?

10 **A.** I would say no.

11 **Q.** Taking some of the principles set out in this  
12 policy, starting with paragraph 3.1.4, please --  
13 that's further up that page, thank you -- under  
14 "Conduct of Investigations", it says:

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

22 It's right, isn't it, that this did not give  
23 any guidance to investigators about how they  
24 should conduct an investigation, did it?

25 **A.** That particular document, no.

40

1 Q. So the conduct of the investigation is up to  
2 them provided it is within the law. Some  
3 legislation is identified in this policy. So if  
4 we can go, please, to page 2, 3.2.2, we see:

5 "Evidence will be gathered and retained in  
6 accordance with the Criminal Procedure and  
7 Investigations Act 1996 (Section 23(1)) Code of  
8 Practice."

9 Under 3.2.8, this is page 2, please,  
10 "Casework":

11 "Investigations leading to potential  
12 prosecution will be reported in accordance with  
13 the Criminal Procedure and Investigations Act  
14 1996 and the Criminal Procedure and  
15 Investigations Act 1996 ... Code of Practice."

16 There is no explanation here, is there, to  
17 what the requirements of the Act and the Code  
18 were, is there?

19 A. Not in that document, no.

20 Q. There is some suggestion that this detail might  
21 be contained elsewhere, going back to the  
22 section on "Deployment", section 4 on page 4,  
23 please. The third paragraph in the box reads:

24 "Investigation Procedures and Standards  
25 relating to this policy are included in the

41

1 please, at 3.1.6, "Prosecuting Criminals":

2 "This policy supports the Code of Business  
3 Standards in normally prosecuting those who  
4 commit theft or fraud and where appropriate  
5 offences against the Postal Services Act 2000  
6 Sections 83 and 84.

7 "Criminal investigations will be conducted  
8 in accordance with the procedures and to the  
9 standards required by legislation, case law and  
10 the courts."

11 Stopping there, the heading here, and what  
12 follows, rather assumes, doesn't it, that it has  
13 already been established that the person  
14 suspected of committing a crime is guilty of it,  
15 doesn't it: they are a criminal, those who  
16 commit theft or fraud?

17 A. The words would say that.

18 Q. Was this the way that those being prosecuted by  
19 the Post Office were spoken about within the  
20 Security team?

21 A. Not to my recollection, no.

22 Q. Were cases of suspected theft or fraud normally  
23 prosecuted?

24 A. From my experience and knowledge, no.

25 Q. Can you elaborate on that?

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1 induction and ongoing training courses and  
2 material provided to investigators. Any changes  
3 to the procedures and standards are notified to  
4 investigators via investigation circulars and  
5 communications."

6 Does that accord with your recollection of  
7 how things worked at the relevant time you  
8 worked in the Security team?

9 A. Yes.

10 Q. This relies though, doesn't it, on the training  
11 materials accurately reflecting the  
12 requirements --

13 A. Yes.

14 Q. -- and Investigators attending both initial and  
15 ongoing training --

16 A. Yes.

17 Q. -- because the applicable provisions may  
18 change --

19 A. Yes.

20 Q. -- and it relies on them being provided with  
21 information on any relevant updates?

22 A. Yes.

23 Q. Did that happen in practice?

24 A. Due to their longevity of time, I cannot recall.

25 Q. In relation to prosecution policy, page 2 again,  
42

1 A. On average, my understanding was we had about  
2 250 or more cases a year of which -- I haven't  
3 got the figures -- around 40 to 50 cases were  
4 forwarded for prosecution.

5 Q. Continuing with paragraph 3.6.1 (*sic*), the  
6 conduct of investigations is addressed again,  
7 and it says -- sorry, 3.1.6:

8 "Criminal investigations will be conducted  
9 in accordance with the procedures and to the  
10 standards required by legislation, case law and  
11 the courts."

12 Moving, then, to paragraph 3.2.9, this is  
13 page 3, on "Prosecution". It's that heading  
14 there, 3.2.9 "Prosecution":

15 "Suspect offenders will be prosecuted where  
16 there is sufficient evidence and it is in the  
17 public interest in accordance with the Code for  
18 Crown Prosecutors. Decisions to prosecute in  
19 non-Crown Prosecution Services cases will be  
20 taken by nominated representatives in the  
21 business with consideration to the advice  
22 provided by the Royal Mail Group Criminal Law  
23 Team."

24 In relation to the responsibility for  
25 deciding whether to prosecute an individual or

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1 not, we can see the position set out here is  
2 that the decision would be taken by nominated  
3 representatives in the business with  
4 consideration to the advice from the Criminal  
5 Law Team.

6 Before we turn to your understanding of the  
7 position, and you have addressed this in your  
8 statement, there are number of other policy  
9 documents addressing this issue which I'd like  
10 to take you to. The first is the "Royal Mail  
11 Group Prosecution Policy", dated October 2009.  
12 The reference is POL00031011.

13 This is a document which was provided to you  
14 by the Inquiry when you were asked to provide  
15 a statement. It is referenced in a footnote to  
16 paragraph 35 of your statement. You say, in  
17 relation to this and the other documents there  
18 footnoted, that you have no recollection of  
19 involvement in the development of the policies.  
20 Had you seen this policy before it was sent to  
21 you by the Inquiry?

22 **A.** I don't have recollection of it. I may have but  
23 I have no recollection, given the time spans,  
24 again.

25 **Q.** This is a document which was in force when you  
45

1 Investigation Team will consider the case and  
2 provide guidance and advice to ensure that Royal  
3 Mail maintains a consistent prosecution policy."

4 So this policy is saying the decision is not  
5 made by any one person but, instead, a decision  
6 would be reached in agreement between three  
7 people reflecting input from Human Resources,  
8 the Investigation team and the Legal team.

9 Next, please, could we have the "Post Office  
10 Limited Fraud Investigation and Prosecution  
11 Policy". The reference here is POL00030580.  
12 This is another policy which was provided to you  
13 by the Inquiry when you were asked to make  
14 a statement. It is referenced in the footnote  
15 to paragraph 14 of your statement as one of the  
16 documents you have no knowledge of.

17 Looking towards the bottom of the page,  
18 please, this appears to be version 2 of this  
19 document, right at the bottom, dated 4 April  
20 2010. Had you seen this document before it was  
21 sent to you by the Inquiry?

22 **A.** I may well have seen it, yes, but I don't  
23 recollect the detail.

24 **Q.** Turning, please, to page 4, section 4., under  
25 the heading "Prosecution":  
47

1 were in the role of Fraud Risk Programme  
2 Manager, this October 2009 document. We can  
3 take this relatively briefly. Going straight,  
4 please, to paragraph 5.1 under the heading  
5 "Prosecutorial Decisions":

6 "The decision to prosecute Royal Mail  
7 investigations in England and Wales will be  
8 reached in agreement between the Human Resources  
9 Director for the affected business unit or his  
10 or her nominated representative, the nominated  
11 representative from the investigation team and  
12 the lawyer advising."

13 Then paragraph 5.5:

14 "It is a requirement of the Royal Mail Group  
15 Conduct Code, fully outlined in paragraph 8.3 of  
16 the Royal Mail Group Crime and Investigation  
17 Policy, that in reaching decisions on conduct  
18 code actions the Human Resources Director or his  
19 or her representative must liaise with those  
20 handling any criminal investigation or  
21 prosecution. In the event of any disagreement  
22 with prosecution advice in England and Wales, or  
23 inconsistency between prosecution and conduct  
24 decisions anywhere in the United Kingdom, the  
25 Head of Criminal Law Team and the Head of the  
46

1 "England & Wales: Decisions to prosecute  
2 will be taken by nominated representatives in  
3 the business with consideration to the advice  
4 provided by the Royal Mail Group Criminal Law  
5 Team and where there is sufficient evidence and  
6 it is in the public interest."

7 So here we have nominated representatives  
8 with consideration being given to advice from  
9 the Criminal Law Team. While we have this  
10 document on screen, could we look, please, also  
11 at section 3.1.3 -- apologies, 3.13 -- on  
12 page 3., on the "Conduct of Investigations".  
13 There is this general statement:

14 "The conduct, course and progress of  
15 an investigation will be a matter for the  
16 investigators as long as it is within the law,  
17 rules and priorities of the business."

18 Looking at paragraph 3.15, further down the  
19 page, there is some assistance with the  
20 procedures and standards investigations should  
21 comply with, and we see a reference here to the  
22 Police and Criminal Evidence Act at the end of  
23 the page. Then over the page, please, various  
24 other sources of legal powers, restrictions and  
25 guidelines.  
48

1 But would you agree that there is no  
2 explanation in this document of what the  
3 requirements of these procedures and standards  
4 are?

5 **A.** Yes.

6 **Q.** We come, then, to the "Royal Mail Group Limited  
7 Criminal Investigation and Prosecution Policy"  
8 issued in November 2010. That is POL00031008.

9 The substance of this policy is very similar  
10 to the earlier version dated December 2007.

11 This document is also one which you say at  
12 paragraph 14 of your statement that you have no  
13 knowledge of. Like the December 2007 version,  
14 it is said at section 4 to be available on the  
15 Royal Mail intranet site. This is a policy that  
16 was issued in the year you took up the role of  
17 Senior Security Operations Manager or stepped  
18 into the role, if that was 2010.

19 Can we take it from the fact that you have  
20 no knowledge of this document that it was not  
21 provided to you at the time you were a Senior  
22 Security Operations Manager?

23 **A.** In terms of knowledge, I would say recollection.

24 **Q.** Were you conscious of this document, its  
25 existence, at the time you were stepping into

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1 to you by the Inquiry when you were asked to  
2 provide a statement. It is referenced in  
3 a footnote to paragraph 35 of your statement and  
4 you say you've no recollection of involvement in  
5 the developed of it but had you seen it before  
6 it was sent to you by the Inquiry?

7 **A.** I don't recollect, no.

8 **Q.** You don't recollect whether you had seen it?

9 **A.** Whether I'd seen it.

10 **Q.** This document sets out "Royal Mail Prosecution  
11 Decision Procedure" as at January 2011. Under  
12 "Purpose", we can see that this document relates  
13 to decisions about whether to prosecute Royal  
14 Mail and agency employees who have been subject  
15 to criminal investigation by Royal Mail Group  
16 investigators.

17 There is reference at 3.1 to paragraph 3.1.6  
18 from a version of the "Royal Mail Group Limited  
19 Criminal Investigation and Prosecution Policy".  
20 This appears to be referring to a different  
21 version of the policy to the two versions we  
22 have looked at today, as paragraph 3.1.6 is said  
23 to contain this sentence:

24 "Sanctions for criminal behaviour will be  
25 effective, proportionate and aimed to deter."

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1 the role?

2 **A.** Not as such, no.

3 **Q.** If we could turn, please, to paragraph 3.2.9 on  
4 page 3 of this document, the paragraph on  
5 "Prosecution":

6 "Suspect offenders will be prosecuted where  
7 there is sufficient evidence and it is in the  
8 public interest in accordance with the Code for  
9 Crown Prosecutors. Decisions to prosecute in  
10 non-Crown Prosecution Services cases will be  
11 taken by nominated representatives in the  
12 business with consideration to the advice  
13 provided by the Royal Mail Group Criminal Law  
14 Team."

15 So responsibility for the prosecution  
16 decision remains, it seems, with the nominated  
17 business representatives in the business, with  
18 consideration to the Criminal Law Team's advice;  
19 would you agree?

20 **A.** Yes.

21 **Q.** Could we have next on screen, please,  
22 POL00030598. This is a "Royal Mail Security --  
23 Procedures & Standards" document entitled "Royal  
24 Mail Prosecution Decision Procedure", and this  
25 is dated January 2011. Again, it was provided

50

1 Do you recall ever reading that sentence in  
2 a policy document that you saw when you were in  
3 the Security team?

4 **A.** I don't recall, no.

5 **Q.** Do you recall any discussion in the Security  
6 team about the aim to deter of prosecution?

7 **A.** No.

8 **Q.** There's then a reference at paragraph 3.2 to  
9 paragraph 3.2.9 of the "Royal Mail Group Limited  
10 Criminal Investigation and Prosecution Policy",  
11 a paragraph which we have seen in the two  
12 versions we've looked at today. It is the  
13 paragraph providing for decisions to be taken by  
14 nominated business representatives in the  
15 business, with consideration to the advice  
16 provided by Royal Mail criminal lawyers.

17 The relevant representatives and the  
18 procedure for decision making are then set out  
19 under sections 4 and 5 of this document. Under  
20 paragraph 4.4, it says this:

21 "The Regional Human Resources Director, or  
22 in Post Office Limited cases the Senior Security  
23 Manager, Security Operations and in Parcelforce  
24 Worldwide the Head of HR Operations, will act as  
25 the 'Decision Maker' in authorising prosecutions

52

1 or not. All Decision Makers will be familiar  
2 with the evidential and the public interest  
3 tests of the Code for Crown Prosecutors and make  
4 decisions accordingly."

5 So, on the face of this document, the  
6 decision-maker in authorising prosecutions or  
7 not, for Post Office Limited cases, was the  
8 Senior Security Manager within Security  
9 Operations, based on advice from the Criminal  
10 Law Team. Is that the role which you were  
11 stepping into?

12 **A.** Yes.

13 **Q.** Can you recall who held this role in January  
14 2011? Were you stepping into the role at that  
15 time or can't you help on that?

16 **A.** It could have been but I can't recollect the  
17 exact time.

18 **Q.** Could we, please, have on screen the next policy  
19 document, POL00030800. This is the "Royal Mail  
20 Group Policy Prosecution (S3)", dated April  
21 2011. This is another document provided to you  
22 by the Inquiry and referenced in a footnote to  
23 paragraph 35 of your statement. It was authored  
24 by Rob Wilson -- do you remember Rob Wilson --

25 **A.** The name, yes.

53

1 the footnote to paragraph 14 as one of the  
2 documents you have no knowledge of. Just to be  
3 clear, had you seen this document before it was  
4 sent to you by the Inquiry?

5 **A.** Again, as per the previous documents, I may well  
6 have had sight of it but I don't recall it.

7 **Q.** If we could go, please, to page 4 of this  
8 document, paragraph 4.7. We come to the  
9 decision to prosecute:

10 "Where an investigation in England and Wales  
11 led by Royal Mail Security investigators is  
12 judged by the relevant casework management  
13 function to have gathered sufficient evidence to  
14 warrant obtaining legal advice, the case will be  
15 submitted to the Royal Mail Legal Services  
16 Criminal Law Team where it will be assessed in  
17 accordance with the Royal Mail Group Prosecution  
18 Policy and a decision made on whether to  
19 prosecute."

20 Whilst it's not entirely clear, would you  
21 agree that this paragraph seems to suggest that  
22 a decision on whether to prosecute would be  
23 taken in the Royal Mail Legal Services Criminal  
24 Law Team?

25 **A.** Yes.

55

1 **Q.** -- as head of the Criminal Law Team. Had you  
2 seen this document before it was sent to you by  
3 the Inquiry?

4 **A.** I may well have been but, again, I don't  
5 recollect, given the timescales involved.

6 **Q.** Under section 4, please, "Prosecutorial  
7 Decisions", this is page 2, paragraph 4.1:

8 "The decision to prosecute Royal Mail Group  
9 investigation cases in England and Wales will be  
10 reached in agreement between the Human Resources  
11 Director for the affected business unit or his  
12 or her nominated representative, the nominated  
13 representative from the investigation team and  
14 the lawyer advising."

15 So this document suggests, as the 2009  
16 version of the "Royal Mail Group Prosecution  
17 Policy" did, that the decision was shared  
18 between three decision-makers: Human Resources,  
19 investigation team and lawyer advising.

20 Can we have on screen, please, POL00031004.  
21 This is the policy entitled "Royal Mail Group  
22 Policy Crime and Investigation (S2)", which is  
23 also dated April 2011. Again, this is a policy  
24 provided to you by the Inquiry when you were  
25 asked to provide a statement. It is referenced

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1 **Q.** So this paragraph would seem to be inconsistent  
2 with the paragraph from the Royal Mail  
3 Prosecution Decision Procedure of January 2011,  
4 which said that the prosecution decision-maker  
5 for Post Office cases was the Senior Security  
6 Manager with Security Operations?

7 **A.** Correct.

8 **Q.** Could we have on screen, please, POL00031034,  
9 the "Post Office Prosecution Policy", dated  
10 1 April 2012. The owner of this document is  
11 Jarnail Singh. Do you remember Jarnail Singh?

12 **A.** I am aware, yes.

13 **Q.** What was his role in relation to prosecutions?

14 **A.** He was, my understanding, the Head of Criminal  
15 Law Team within Post Office.

16 **Q.** This is another document which is referenced in  
17 a footnote to paragraph 35 of your statement.  
18 Had you seen this document before it was sent to  
19 you by the Inquiry?

20 **A.** As with the other documents, I may well have had  
21 sight of it. I just don't recollect, again.

22 **Q.** "Prosecutorial Decisions" are addressed at  
23 paragraph 4.1 on page 2, please. Under "England  
24 & Wales":

25 "The decision to prosecute Post Office

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1 investigations in England and Wales will be made  
2 by the Post Office Head of Security taking  
3 advice from Post Office Legal and HR as  
4 appropriate and relevant."

5 So it seems there is a change here from  
6 decision-maker in Post Office cases being the  
7 Senior Security Manager, to being the Head of  
8 Security, with input from Legal and Human  
9 Resources; would you agree?

10 **A.** Yes.

11 **Q.** There is one final document to look at on the  
12 responsibility for prosecutorial decisions.  
13 Could we have on screen, please, POL00030686.  
14 This is entitled "Post Office Prosecution Policy  
15 England and Wales", and is dated 1 November  
16 2013. It is authored by Simon Clarke of  
17 Cartwright King solicitors. If we could turn,  
18 please, to page 6., paragraphs 3.2 to 3.3:

19 "The decision as to whether to prosecute in  
20 any particular case, or to continue with any  
21 prosecution, will always be taken by Post Office  
22 Limited. In arriving at such a decision Post  
23 Office Limited will always apply the terms of  
24 this policy. Post Office Limited will never  
25 institute criminal proceedings against any

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1 prosecutions."

2 Then on page 10, please, paragraph 35, about  
3 halfway down the paragraph you say:

4 "I am not aware of any specific changes to  
5 this during my service in the Security team."

6 Pausing there, by "this", are you referring  
7 to the Post Office Prosecution Policy?

8 **A.** Yes.

9 **Q.** You go on:

10 "Decisions on whether to raise a case would  
11 be taken between the relevant parties involved  
12 (such as contracts or line managers), with any  
13 decisions on prosecution and/or confiscation  
14 proceedings decided by the Criminal Law Team in  
15 conjunction with external lawyers (Cartwright  
16 King)."

17 Does it remain your evidence that,  
18 regardless of what is written in the various  
19 policies, for the time you held roles within the  
20 Security team, 2000 to 2015, it was the Criminal  
21 Law Team who made the ultimate decision on  
22 whether an individual should be prosecuted?

23 **A.** It would appear that from my comments, yes.

24 **Q.** Well, I'm asking you what your evidence is.

25 **A.** Yes.

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1 person until competent legal advice has been  
2 provided by a properly qualified lawyer that  
3 such a course meets the terms of this Policy and  
4 the Code for Crown Prosecutors.

5 "The decision taker will be

6 "i. A qualified lawyer

7 "ii. Independent of any Post Office Limited  
8 department having a direct financial or other  
9 interest in prosecution."

10 So by November 2013, as a matter of policy,  
11 the decision-maker needed to be a qualified  
12 lawyer who was independent of any Post Office  
13 Limited department, having a direct financial or  
14 other interest in prosecution; is that right?

15 **A.** From the document, yes.

16 **Q.** Having run through what the policy documents say  
17 about responsibility for prosecutorial  
18 decisions, can we look, please, at your evidence  
19 on the point. This is Mr Hayward's statement,  
20 please, which is WITN08160100. It's page 5 of  
21 that document, please, paragraph 18:

22 "In respect of other teams within the Post  
23 Office being involved in criminal investigations  
24 and prosecutions, the legal team gave overall  
25 direction and authority to proceed in

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1 **Q.** Does it remain your recollection that, in  
2 practice, that was the position?

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

4 **Q.** At which time?

5 **A.** That I was involved in this.

6 **Q.** Apologies, just to be clear. So you were in  
7 relevant roles in the Security team from the  
8 year 2000 --

9 **A.** Yes.

10 **Q.** -- to 2015, and we've been through how those  
11 roles changed over that period --

12 **A.** Yes.

13 **Q.** -- and you're saying in your evidence at  
14 paragraph 35 that you're not aware of any  
15 specific changes to the prosecution policy  
16 during your service in the Security team.  
17 You're saying that it was the Criminal Law Team,  
18 in conjunction with external lawyers, Cartwright  
19 King, who made the ultimate decision on whether  
20 an individual should be prosecuted and I'm  
21 asking whether it remains your evidence that  
22 that was the position throughout that whole  
23 period or, having looked at the policies, is  
24 your evidence different on that?

25 **A.** Having looked at these in detail with yourself,

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1 it would appear that was not the case.  
 2 **Q.** Taking it back to the point at which you left  
 3 the Physical Crime Team, so 2008 onwards, can  
 4 you recall when Cartwright King started to  
 5 become involved?  
 6 **A.** I couldn't, no.  
 7 **Q.** Okay. Casting your mind back, before Cartwright  
 8 King got involved, who was making the ultimate  
 9 decision on prosecution?  
 10 **A.** I can't recall the exact specific, other than it  
 11 would be either Legal Services in conjunction  
 12 with the Head of Security or a nominated person.  
 13 **MS PRICE:** Sir, unless you have any questions, might  
 14 that be a convenient moment for the morning  
 15 break?  
 16 **SIR WYN WILLIAMS:** Yes, certainly. Yes. That's  
 17 fine. So what time shall we resume?  
 18 **MS PRICE:** 11.50, sir?  
 19 **SIR WYN WILLIAMS:** Yes, okay. Fine.  
 20 (11.29 am)  
 21 (A short break)  
 22 (11.50 am)  
 23 **MS PRICE:** Hello, sir. Can you see and hear us?  
 24 **SIR WYN WILLIAMS:** Yes, thank you.  
 25 **MS PRICE:** Can we have on screen, please,  
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1 "Andy."  
 2 We have the offender report which was  
 3 attached to Maureen Moors' email. Could we have  
 4 this on screen, please, it is POL00010214.  
 5 Could we have the last page of this  
 6 document, please, page 7, at the bottom, please.  
 7 This document is dated 9 December 2009. Going  
 8 to the first page of this document, please,  
 9 about two-thirds of the way down the page, we  
 10 see your name as "Designated Prosecution  
 11 Authority", yes?  
 12 **A.** Yes.  
 13 **Q.** Your title is given as "Senior Security  
 14 Manager". Having seen the email we have just  
 15 looked at and this document, do you think it is  
 16 right that you were the decision-maker on  
 17 whether to prosecute in this case?  
 18 **A.** Given that information at the time, yes.  
 19 **Q.** Was this is an instance of you stepping in to  
 20 fill the role of the Senior Security Manager and  
 21 taking on the job of making decisions on  
 22 prosecutions where required during that time?  
 23 **A.** Yes.  
 24 **Q.** What documents would you normally be provided  
 25 with when considering whether to authorise  
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1 POL00010221.  
 2 Mr Hayward, this is an email chain dated  
 3 4 January 2010. The first email in the chain is  
 4 from someone called Maureen Moors, and is timed  
 5 at 15.50. What roles did Maureen Moors hold at  
 6 this time, do you remember?  
 7 **A.** She worked in the Administration team and  
 8 Security.  
 9 **Q.** Her email says:  
 10 "Andy,  
 11 "Please find attached files for the above  
 12 case for your authority to proceed as per Legal  
 13 Services advice regarding the above named.  
 14 "Regards."  
 15 It appears there were a number of  
 16 attachments to this email, if we can scroll down  
 17 the page, please. So we can see "Offender  
 18 Report", two documents with references there  
 19 following, a legal memo dated 24 December 2009  
 20 and a schedule of charges.  
 21 You reply to this email, if we go back up to  
 22 the top, please, at 16.35, so 45 minutes after  
 23 the email from Maureen Moors and you say:  
 24 "Authority granted.  
 25 "Regards,  
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1 a prosecution?  
 2 **A.** From recollection, the previous document that  
 3 you uploaded regarding the case itself and the  
 4 details of the case, and the comments from Legal  
 5 Services, the legal team on the prosecution,  
 6 those are two specifics that I do recall because  
 7 I've seen -- I don't recall the specific  
 8 document regarding the office concerned and the  
 9 individual, however I have seen a number of  
 10 those that gave one the understanding of the  
 11 case and also the criminal -- the Criminal Law  
 12 Team's comments on that.  
 13 There may have been other attachments that  
 14 one would look at and previous conversations  
 15 that might have been had prior to that taking  
 16 place but I don't recall those documents.  
 17 **Q.** Okay. As a matter of practice, did you read all  
 18 of the documents you were sent or did you just  
 19 read the legal memo before making a decision?  
 20 **A.** No, I read the documents as well. So in terms  
 21 of -- specifically in terms of the report,  
 22 I would have read that and I'm conscious of the  
 23 timescale involved in that. However, from  
 24 recollection, I would have, for example, when  
 25 I did the senior authorising officer, as a type  
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1 of example, I would have pre-conversations,  
 2 I would be called by an individual to say, "This  
 3 is coming" -- you know, "This is coming your  
 4 way, this is going to be emailed, it's now  
 5 progressed", so that one was aware of what was  
 6 coming one's way.

7 And, certainly, with regards the report  
 8 from -- as you showed earlier, together with  
 9 that, if there are other documents -- I can't  
 10 recollect those specific documents but  
 11 I wouldn't have just looked at the Criminal Law  
 12 Team's comments and then just passed it on.

13 **Q.** What test were you applying when you were  
 14 deciding whether or not to authorise  
 15 a prosecution?

16 **A.** So I was aware of the testing in -- to the best  
 17 of my knowledge, in criminal law was, has  
 18 an offence been committed and is it in the  
 19 public interest? Those were always the two  
 20 tests -- primary tests that one considered.

21 **Q.** Was any guidance available to you when you were  
 22 making these decisions on the applicable test?

23 **A.** In terms of the taking each case on its merit,  
 24 I don't recall, no.

25 **Q.** Could we have on screen, please, POL00010478.

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1 you, rather than the substance of the advice?

2 **A.** I think both counted.

3 **Q.** In fairness to you, it appears that this case  
 4 was further considered by Iain Murphy from the  
 5 Security team in September 2010 with the benefit  
 6 of a legal memo. Could we have on screen,  
 7 please, POL00010488. We can see here that at  
 8 10.33, on 23 September 2010, Maureen Moors sends  
 9 Mr Murphy number of documents to consider,  
 10 including the offender report, an offender  
 11 report follow-up, a legal memo and a schedule of  
 12 proposed charges.

13 We see, scrolling up the page, please, that  
 14 Mr Murphy, his email 23 September, 10.39,  
 15 replies with the instruction to proceed six  
 16 minutes later; is that right?

17 **A.** Yes.

18 **Q.** May we have on screen, please, POL00047161.

19 This is an email chain from May 2010 relating to  
 20 the case of Allison Henderson. There is the  
 21 same wording from Maureen Moors as in the other  
 22 emails we've looked at, her email sent at 14.08  
 23 on 25 May 2010. Your reply comes at the top,  
 24 9.30 am on 26 May 2010.

25 This was another example, wasn't it, of you

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1 This is an email chain from the summer of 2010.

2 We see an email from Maureen Moors timed at  
 3 15.30 on 30 June 2010 -- it's in the middle  
 4 there -- which uses the same wording as the last  
 5 email seeking "your authority to proceed". Your  
 6 reply above is timed at 16.56 on 5 July 2010.

7 You say:

8 "Maureen,

9 "Although no legal memo was attached to this  
 10 I am working on the assumption that it has been  
 11 recommended that I proceed to prosecution which,  
 12 and if the case I agree with.

13 "Regards

14 "Andy."

15 You appear to have been content to authorise  
 16 prosecution in this case without consideration  
 17 of the legal advice from the Criminal Law Team;  
 18 is that right?

19 **A.** From those notes, yes. Although I would have  
 20 thought that I would have just subsequently seen  
 21 the legal memo or seen it before because I would  
 22 not normally make that kind of a decision, but  
 23 that's my recollection.

24 **Q.** Was it therefore the fact of a recommendation  
 25 from the Criminal Law Team that was important to

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1 granting your authority to proceed with  
 2 prosecution?

3 **A.** Yes.

4 **Q.** I don't intend to take you through all the  
 5 examples of you providing your authority to  
 6 proceed but, to the best of your recollection,  
 7 how regularly were you making prosecution  
 8 decisions at this point: every month, every  
 9 week?

10 **A.** I have no firm recollection. If you want me to  
 11 hazard an estimation, I would say it would be  
 12 monthly. But it would be dependent on the  
 13 number of cases at any one time, but I don't  
 14 have the statistics nor the facts to back that  
 15 statement up.

16 **Q.** Were you given any training before you took on  
 17 this role of granting authority to proceed with  
 18 prosecutions?

19 **A.** From recollection, no.

20 **Q.** Did you ever refuse to grant authority for  
 21 a prosecution when the legal advice was that the  
 22 prosecution test was met?

23 **A.** From recollection, no.

24 **Q.** Do you recall any occasion on which the legal  
 25 advice was that the prosecution test was not

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1 met?

2 **A.** I don't remember.

3 **Q.** Your role, when you were stepping into the role  
4 as a Senior Security Manager, involved  
5 recovering losses, didn't it, in that you were  
6 involved in criminal enforcement proceedings?

7 **A.** Yes.

8 **Q.** Did you recognise at the time that you were,  
9 when making decisions on prosecutions, in  
10 essence, in the position of victim, acting as  
11 you were for the Post Office; investigator, in  
12 that it was your team conducting the criminal  
13 investigations; and prosecutor?

14 **A.** I did not.

15 **Q.** Do you feel comfortable with this now?

16 **A.** I think in light of the evidence that you have  
17 clearly displayed, it would appear, with the  
18 benefit of hindsight that the various areas you  
19 said would now not be the norm but, at the time,  
20 I had no knowledge of that or understanding of  
21 that, that would question me at the time. Nor  
22 did anything thereafter, in terms of  
23 a prosecution proceeding by any prosecution or  
24 defence legal expert query this particular  
25 structure.

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1 **Q.** Just in terms of on the face of the policies  
2 we've looked at on the screen this morning,  
3 would you agree that there wasn't much  
4 assistance in those policies on the substance of  
5 the legal requirements, as opposed to the  
6 identification of the statute --

7 **A.** In the ones displayed this morning, yes, that  
8 appears the case.

9 **Q.** You have already given an explanation of the  
10 form of training which Investigators were  
11 provided with when they joined the Security  
12 team. I'd like to come now to the specific  
13 guidance which was provided to Investigators on  
14 the conduct of investigations, particularly in  
15 relation to their duties of full inquiry and  
16 disclosure when you held relevant roles within  
17 the Security team.

18 Could we have on screen, please,  
19 Mr Hayward's statement to the Inquiry,  
20 WITN08160100, page 11, please, and paragraph 37.  
21 You say here you have considered a number of  
22 documents identified by the Inquiry, and these  
23 are listed at footnote 3 at the bottom of the  
24 page.

25 You go on:

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1 **Q.** After you provided your authority for  
2 prosecution on the occasions that you did, did  
3 your involvement in a case continue?

4 **A.** To my recollection, no.

5 **Q.** Did you have any involvement in disclosure in  
6 relation to any prosecutions you authorised?

7 **A.** Not to my memory or recollection.

8 **Q.** We have looked at a number of Criminal  
9 Investigation and Prosecution Policies already.  
10 Would you agree, having had the opportunity to  
11 look at those policies, even if just in the  
12 preparation for your evidence today, that  
13 investigators would have found little assistance  
14 in the policies we've looked at relating to the  
15 substance of the legal requirements, relating to  
16 the conduct of criminal investigations.

17 **A.** I think it depends on the individual concerned,  
18 ie the Investigator and, again, I don't  
19 recollect the finer detail of the policies,  
20 et cetera, because of the time longevity of it  
21 and the number of policies. But I think  
22 Investigators, having been trained and how they  
23 sought to then review those documents, one would  
24 have to ask the individuals concerned, each  
25 specific Investigator.

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1 "In respect of the documents referred to in  
2 this section, to the best of my knowledge the  
3 documents would have been referred to as part of  
4 the training modules for investigators which in  
5 summary would have included the specifics of how  
6 to undertake tape recorded interviews, how to  
7 take and manage witness statements, guidelines  
8 to follow during an investigation, how to  
9 conduct an interview with key points to cover  
10 for a criminal investigation in relation to the  
11 Theft Act, how to fully manage a case file  
12 investigation, correct procedures to follow in  
13 gaining evidence, including evidence from third  
14 parties such as Fujitsu data and  
15 an understanding of disclosure, dealing with  
16 defence solicitors, complaints, report writing  
17 and the decision making process for criminal  
18 investigations."

19 You say at the end:

20 "From a personal perspective I was trained  
21 over 20 years ago and I have no further detailed  
22 knowledge of this area."

23 One of the documents to which you were  
24 referred by the Inquiry and which is listed at  
25 this footnote 3 of your statement, is document

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1 reference POL00104848. Could we have that on  
2 screen, please. This is a "Royal Mail Group  
3 Security -- Procedures & Standards" document,  
4 entitled "Appendix 1 to P&S 9.5 Disclosure of  
5 Unused Material & the Criminal Procedure and  
6 Investigations Act 1996". It is dated July  
7 2010. Had you read this document before it was  
8 sent to you by the Inquiry?

9 **A.** I don't have recollection of that document.

10 **Q.** In general terms, how were Investigators made  
11 aware of documents like this, other than during  
12 initial training?

13 **A.** From memory, my understanding would be that  
14 because there were links between the Royal Mail  
15 Group Security and Post Office, when they were  
16 both linked and separated, that the policy  
17 writer or amender would contact or email the --  
18 a document to the admin team, and then that  
19 would be -- I can't think of the word --

20 transferred to the relevant parties,  
21 ie Investigators, so they were aware of any  
22 changes that were happening, or any updates to.

23 **Q.** Starting, please, with paragraph 1.1 in this  
24 document, about halfway down the page:

25 "The legislative basis for disclosure of

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1 is to ensure that any relevant material is  
2 retained and that records of such material are  
3 maintained."

4 Paragraph 2.2 defines a "Disclosure  
5 Officer":

6 "Disclosure Officer is the person  
7 responsible for examining material retained  
8 during an investigation and revealing 'relevant  
9 material' to the Prosecutor (CLT). In most  
10 Royal Mail Group cases the lead Investigator and  
11 the Disclosure Officer will be the same person.  
12 As such, within these Procedures & Standards the  
13 responsibilities of the Disclosure Officer will  
14 be undertaken by the lead investigator. (Should  
15 a Disclosure Officer be allocated in a large and  
16 complex case then both they and the lead  
17 Investigator should consult the CP&I Act 2005  
18 CoP to ensure they are fully aware of their  
19 responsibilities.)"

20 Pausing there, the prosecutor is identified  
21 here as being CLT; is that the Criminal Law  
22 Team?

23 **A.** My understanding, yes.

24 **Q.** Do you understand this to be referring to the  
25 team conducting the prosecution or the person

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1 unused material is the Criminal Procedure and  
2 Investigations Act 1996 as amended by the  
3 Criminal Justice Act 2003. A Code of Practice  
4 is issued in accordance with Section 23(1) of  
5 the CPIA 1996. Investigators must comply with  
6 the current version of the CoP, which came into  
7 effect on 4 April 2005 and can be found embedded  
8 below."

9 We see there a pdf image, don't we, of  
10 a document embedded below?

11 **A.** Yes.

12 **Q.** So this document was drawing attention to the  
13 need for Investigators to comply with the Code  
14 of Practice to the Criminal Procedure and  
15 Investigations Act 1996 and embedded that Code  
16 into this document.

17 Looking, please, at page 2 at the top of the  
18 page under "Definitions and Terminology",  
19 paragraph 2.1 defines an "Investigator":

20 "An Investigator is a person involved in the  
21 conduct of a criminal investigation involving  
22 any part of our Business. All Investigators  
23 have a responsibility for carrying out the  
24 duties imposed on them under the CP&I Act 2005  
25 CoP. The main responsibility of Investigator(s)

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1 deciding whether or not someone should be  
2 prosecuted?

3 **A.** If you bear with me two minutes. From reading  
4 that, I would have said the Criminal Law Team.

5 **Q.** In terms of the role that the Criminal Law Team  
6 was playing, do you understand that to mean that  
7 the Criminal Law Team was making a decision on  
8 whether someone should be prosecuted or  
9 conducting the prosecution?

10 **A.** Making a decision.

11 **Q.** There is, on the face of things, a tension here,  
12 isn't there, between what is said in this  
13 document and the 2010 policies we looked at  
14 earlier, so namely the Post Office Limited Fraud  
15 Investigation and Prosecution Policy, dated  
16 4 April 2010, and the Royal Mail Group Limited  
17 Criminal Investigation and Prosecution Policy  
18 issued in November 2010?

19 Both of those documents stated that the  
20 decision on whether to prosecute lay with  
21 nominated business representatives in the  
22 business with consideration to the Criminal Law  
23 Team's legal advice, didn't it?

24 **A.** Yes.

25 **Q.** Picking up on the second sentence in

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1 paragraph 2.2 in this document, when you first  
2 took on the role of a Senior Security Operations  
3 Manager, did you understand the position to be  
4 that the lead investigator was also the  
5 disclosure officer?

6 **A.** From memory yes, but I can't recollect fully the  
7 specifics, but yes.

8 **Q.** Moving down to about halfway down the page,  
9 under the heading "Duties for Investigators (&  
10 Disclosure Officers)", paragraph 3.1 says this:

11 "The Investigator must inform the Prosecutor  
12 (normally the Criminal Law Team) as soon as  
13 practicable if they have any material which  
14 weakens the case against the accused. The Act  
15 envisaged that some disclosure may have been  
16 made before the statutory duty to disclose  
17 arises."

18 Then at 3.2, we have this:

19 "Reasonable Lines of Inquiry. Investigators  
20 must pursue all reasonable lines of inquiry,  
21 whether these point towards or away from the  
22 suspect. What is reasonable in each case will  
23 depend on the particular circumstances. For  
24 example, where material is held on a computer,  
25 it is a matter for the Investigator to decide

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1 Going over the page, please, we can see  
2 a number of topics being addressed: "Prosecutor  
3 (CLT) Guidelines", at section 4; about halfway  
4 down the page "Prosecution Advocates Guidelines"  
5 at section 5; towards the bottom of the page,  
6 "Guidance on Completion of the Schedule of  
7 Non-Sensitive, Unused Material".

8 Over the page again, please, about  
9 two-thirds of the way down the page: "Guidance  
10 on Completion of the Schedule of Sensitive  
11 Unused Material", at section 7.

12 Over the page again, please, about halfway  
13 down: "Guidance on the completion of the  
14 Disclosure Officer's Report", at section 8; and  
15 towards the bottom of the page we have  
16 section 9, "Items not unusually scheduled on the  
17 GS006C or GS006D", those are the schedules of  
18 non-sensitive and sensitive materials, aren't  
19 they, those references?

20 **A.** Yes.

21 **Q.** Just before we leave this document, looking,  
22 please, at paragraph 9.1, under this heading, it  
23 says this:

24 "Offender reports and correspondence with  
25 the Prosecutor (CLT) is usually regarded as

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1 which material on the computer it is reasonable  
2 to enquire into and in what manner."

3 What did -- or do, if you can't recall what  
4 you thought at the time -- you understand the  
5 reference to "material held on the a computer"  
6 to be referring to?

7 **A.** On the basis of those comments there, I would  
8 have either said it was Horizon and/or other  
9 systems within the Post Office because there  
10 were other systems that held data. I'm not  
11 *au fait*, at this current moment in time, with  
12 what those systems were but it would be computer  
13 systems held by Post Office.

14 **Q.** So individual investigators were, on the face of  
15 this policy document, left to decide on  
16 a case-to-case basis what material held on  
17 a computer should be enquired into and in what  
18 manner. Do you recall there being any  
19 overarching policy on this at this stage?

20 **A.** No, I don't.

21 **Q.** The remainder of section 3 in this document  
22 provides guidance on the duties applying to  
23 Investigators and Disclosure Officers, including  
24 setting out the disclosure test -- over the  
25 page, please -- at paragraph 3.8.

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1 subject to legal privilege, and should not  
2 appear on any schedule. However if the contents  
3 contain relevant material that is not recorded  
4 elsewhere then there will be a need to reveal  
5 the information in some format."

6 So this is recognising, isn't it, that  
7 relevant material in an offender report, which  
8 would usually be regarded as legally privileged,  
9 must be revealed in some format if it is not  
10 recorded elsewhere?

11 **A.** Yes.

12 **Q.** That document can come down now, please.

13 Having looked through some of the detail of  
14 that document, does it help you with whether you  
15 think you saw that document at the time you were  
16 in the Security team?

17 **A.** No, as such, because of -- again, I'll  
18 recollect, I may -- a number of these documents  
19 I would have more than likely have had sight of  
20 in my roles. However, can I recollect those?  
21 No, I can't, given the timescales.

22 **Q.** This is one of the documents that you said at  
23 paragraph 37 of your statement to the Inquiry  
24 that would have been referred to as part of the  
25 training modules for investigators. Just to be

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1 clear, do you mean in their initial training?  
 2 **A.** Yes.  
 3 **Q.** What do you mean when you say "documents like  
 4 this would have been referred to"? Do you mean  
 5 trainees would have been directed where to find  
 6 the document or that the substance would have  
 7 been covered in training?  
 8 **A.** I think, given the amounts of documents  
 9 involved, they would have been referred to.  
 10 But, again, I can't recollect the specific  
 11 documents that may well have been discussed  
 12 during training and those that were referred to.  
 13 **Q.** Can you recall whether there was any training  
 14 provided for Investigators, who were not new to  
 15 the Security team, on the requirements of the  
 16 Code which were summarised in this 2010 document  
 17 we've just been looked at?  
 18 **A.** Sorry, could you repeat the question, please?  
 19 **Q.** Can you recall whether there was any training  
 20 provided for Investigators, who were not new --  
 21 so new investigators would have had initial  
 22 training --  
 23 **A.** Yes.  
 24 **Q.** -- but those who were already established in the  
 25 role, was any training provided for them on the

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1 **Q.** Could we go back to the bottom of the first page  
 2 of this document, please. The email is entitled  
 3 "Committal Papers", as we've seen and reads as  
 4 follows:  
 5 "Ian/Andy  
 6 "I have developed Procedures & Standards in  
 7 respect of Committal Papers and this has been  
 8 agreed by the Criminal Law Team. Accordingly,  
 9 the P&S and relevant forms are associated with  
 10 this email. Arrangements are in hand to publish  
 11 the documents on SharePoint and the GSD."  
 12 Just pausing there, can you just explain  
 13 what "SharePoint and the GSD", what this was  
 14 referring to?  
 15 **A.** The "GSD", I would hazard a guess it was Group  
 16 Security Directorate, but that's my stab at that  
 17 and SharePoint was a name where, by its name,  
 18 shared documents within the team.  
 19 **Q.** Who had access within the Security team to  
 20 SharePoint?  
 21 **A.** It would have been the Security team.  
 22 **Q.** So all individuals within the Security team?  
 23 **A.** I couldn't categorically say which members,  
 24 certainly the Investigators.  
 25 **Q.** Going on:

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1 requirements of the Code that was summarised in  
 2 this 2010 document?  
 3 **A.** I'm not aware from my perspective of any formal  
 4 training would have taken place, other than the  
 5 comment previous as to how each team devolved  
 6 that information. But I don't recall any  
 7 specific formal training, from my perspective.  
 8 **Q.** Could we have on screen, please, POL00121680.  
 9 Starting, please, towards the bottom of the  
 10 first page of this document, this is an email  
 11 from Mick F Matthews to you and Iain Murphy,  
 12 dated 6 September 2010. The subject is  
 13 "Committal Papers".  
 14 Going over the page, please, we see the  
 15 sign-off from Mick Matthews. He was, at the  
 16 time, an Investigation Procedures and Standards  
 17 Manager with Royal Mail Letters Security. Do  
 18 you remember Mick Matthews?  
 19 **A.** Not well but I've heard of the name.  
 20 **Q.** Do you remember Iain Murphy?  
 21 **A.** Yes.  
 22 **Q.** What role was Iain Murphy in at the time of this  
 23 email chain, so September 2010?  
 24 **A.** He would have been one of the direct reports,  
 25 Senior Security Operations Managers -- Manager.

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1 "A presentation has been delivered to RML &  
 2 PFWW ..."  
 3 Is that Royal Mail Letters and Parcelforce  
 4 Worldwide?  
 5 **A.** Yes.  
 6 **Q.** "... Investigators as they do not get the same  
 7 number of committals as Investigators in PO  
 8 Limited so you may wish to merely forward this  
 9 to your Investigators for their information in  
 10 respect of the procedures and amended forms."  
 11 Do you recall receiving this email, as you  
 12 sit here now?  
 13 **A.** No. Clearly my name is on there and  
 14 I wouldn't -- obviously, I accept that I have  
 15 received it. Do I remember it, no.  
 16 **Q.** There were a number of attachments to  
 17 Mr Matthews' email. One of these was  
 18 a procedures and standards document relating to  
 19 the requirements for committal papers and he  
 20 also attached a PowerPoint presentation on  
 21 committal papers, which appears to be the  
 22 presentation he was referring to in that email.  
 23 Could we have this on screen, please. The  
 24 reference is POL00124232. We can see there the  
 25 title of the presentation, on the first page,

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1 "Procedures & Standards Work Time Learning  
2 Session Committal/Trial Papers". Over the page,  
3 please, to page 2, we see "Committal Papers" are  
4 defined:

5 "Elects a trial at either the Magistrates or  
6 Crown Court, or

7 "Is committed to stand trial at the Crown  
8 Court prior to entering a plea

9 "Submitted 21 days in advance."

10 Page 3, please. We see here the contents of  
11 the presentation are set out. At the bottom we  
12 see there "Non-Sensitive Unused", with the code  
13 for that form.

14 Over the page, please, "Sensitive Unused",  
15 the code for that form; "Disclosure Officer's  
16 Report", and the code for that form.

17 If we can turn, please, to page 10 of this  
18 document, we see there there's the title "Unused  
19 Material & CP&I Act 1996", and we see there that  
20 the presentation appears to have covered some of  
21 the headings we've looked at in the Appendix 1  
22 document, so the "Investigator/Disclosure  
23 Office" -- that maybe meant to be "Officer" --  
24 Retain, Record, Reveal":

25 "Prosecutor

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1 email at the time but do you recall any  
2 discussions at all on whether there should be  
3 a presentation for Post Office investigators,  
4 akin to the type of presentation that was being  
5 given to the Royal Mail Letters and Parcelforce  
6 Worldwide Investigators?

7 **A.** I don't, with regard to that specific  
8 presentation, have knowledge of if and what was  
9 then delivered by Post Office.

10 **Q.** If we can have that email back on screen,  
11 please, the reference is POL00121680.

12 We can see the response to Mick Matthews  
13 from Iain Murphy in the middle of the page,  
14 please:

15 "Mick -- many thanks.

16 "Gents ..."

17 There are some other people that have been  
18 added to the copy list there:

19 "Please see attached for your  
20 information/consideration, et cetera.

21 "Regards,

22 "Iain."

23 Then looking further up the page again, we  
24 can see this is picked up by Andrew Daley who  
25 sends the emails to date to a number of

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1 "Disclosure if meets the 'Disclosure test'

2 "CLT & Prosecution Advocates Duties."

3 Over the page, please. We see the forms for  
4 revealing relevant material being referenced and  
5 those are the non-sensitive material, sensitive  
6 material and Disclosure Officer's report.

7 On the next page, page 12 of this document,  
8 there is some bullet points on unused  
9 non-sensitive material.

10 The next page, page 13, please, there are  
11 some bullet points on unused sensitive material.

12 Over the page, again, please, page 14, there  
13 is an explanation of the "Disclosure Officer's  
14 Report":

15 "Used to identify to the CLT material which  
16 the Investigator believes meets the 'Disclosure  
17 Test'.

18 "Secondly to certify that the Investigator  
19 has revealed all relevant material to the CLT."

20 Then, finally, in this document, please, the  
21 next page, page 15, some bullet points on items  
22 not recorded on the schedules of non-sensitive  
23 or sensitive material. Included at the top:

24 "Items subject to Legal Privilege."

25 You say you don't recall receiving this

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1 individuals and it seems, doesn't it, that you  
2 fall off the circulation list at this point?

3 **A.** Yes.

4 **Q.** Can you help us with what roles the people who  
5 received this last email held? Were they  
6 Investigators or Managers?

7 **A.** A combination of both. So where I referred to  
8 earlier this morning, regarding Security team  
9 leaders, one can only remember one -- names at  
10 the time of being asked the question, a couple  
11 of those names there, ie Mr Jason Collins, was  
12 also a team leader at some stage. Mr Paul  
13 Southin was an Investigator but also a Financial  
14 Investigator later on in his career. The rest,  
15 as I look at them now on screen, were  
16 Investigator.

17 **Q.** Mr Matthews, in his original email, suggested  
18 that a presentation had been delivered to RLM  
19 and PFWW Investigators as they did not get the  
20 number of committals as Investigators in the  
21 Post Office. Was that how Post Office  
22 Investigators were viewed within the Royal Mail  
23 Group: as being experienced in investigations  
24 which proceeded to court?

25 **A.** From a personal viewpoint, no. Some of the

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1 ex -- looking at some of the names previously,  
 2 some of the Investigators that were within the  
 3 same sphere of Royal Mail Post Office when the  
 4 business separated went to Royal Mail. However,  
 5 they had sat within the Post Office side of  
 6 investigations so one would deem they were  
 7 experienced in Post Office and subsequently  
 8 Royal Mail. So there was a wide-ranging level  
 9 of experience in the team but certainly not  
 10 separating the two with that particular comment.

11 **Q.** It may follow from the answers you've already  
 12 given but do you recall whether any presentation  
 13 was provided to Post Office Investigators?

14 **A.** I don't -- apologies. I don't recall those.  
 15 Certainly, if there was one -- and I note there  
 16 from the comment from Mr Daley that he's --  
 17 I wouldn't say jumping the gun but keen to get  
 18 something delivered. My normal experience of  
 19 anything that would be delivered of  
 20 significance, it would capture all of the team,  
 21 so that all people were aware. In what format  
 22 that would be delivered could vary but I'm not,  
 23 in terms of this particular document, aware of  
 24 what was proceeded with, given the -- again, the  
 25 timescales involved.

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1 **A.** From a legislative purpose, I would probably err  
 2 on no because legislation that covers all fields  
 3 of an investigation. Without specific reference  
 4 to any detail, one could say Post Office and its  
 5 computer systems would not be used in Royal Mail  
 6 sphere. So, therefore, it may not cover those  
 7 elements but I was not versed nor experienced  
 8 enough to -- the people who wrote these  
 9 documents, I think, was more -- wherewithal --  
 10 catch-all, if that makes sense. So not specific  
 11 to Post Office operations.

12 **Q.** Moving, please, to Security team investigation  
 13 casework compliance, could we have on screen,  
 14 please, POL00120956. This is an email from Dave  
 15 Posnett to a long list of individuals and to the  
 16 Post Office Security email address. It is dated  
 17 15 June 2012. Have you had a chance to look at  
 18 this document before giving evidence today?

19 **A.** Yes.

20 **Q.** Do you recall the introduction of compliance  
 21 checks on investigation case files within the  
 22 Security team?

23 **A.** Not in specific detail but, as -- I'm sure if  
 24 you bring it up, I can maybe recollect.

25 **Q.** But do you recall compliance checks being

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1 **Q.** Could we have on screen, please, Mr Hayward's  
 2 witness statement which is WITN08160100 at  
 3 paragraph 34, which is page 9 of this document.

4 You say here, about halfway down --  
 5 actually, let's read it all for the context:

6 "In respect of conducting criminal  
 7 investigations following a shortfall, from my  
 8 understanding the document POL00105223 was  
 9 written to support investigators in the full  
 10 process in gathering evidence to support the  
 11 investigating officer in a specific POL case.  
 12 Previous to this the Royal Mail documents were  
 13 written to cover both Royal Mail and POL  
 14 investigations, but did not detail the specific  
 15 elements covered by POL. All Royal Mail and POL  
 16 cases did not differ in reference to adhering to  
 17 the legislative framework set out in the  
 18 documents noted at footnote 1 of this  
 19 statement."

20 Might there have been a problem, therefore,  
 21 that the policies and procedures and standards  
 22 documents produced by Royal Mail Group before  
 23 separation were simply not specific enough to  
 24 the work being done by Post Office Security team  
 25 Investigators to give meaningful guidance?

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1 introduced?

2 **A.** Yes, but not in the -- with regards to how that  
 3 progressed, that was, from my understanding,  
 4 down more to the team leaders to manage.

5 **Q.** Looking then at the top email:

6 "All,

7 "Just a little reminder that the compliance  
 8 on green jacket/offender files will recommence  
 9 in July. I associate the email and attachments  
 10 I sent out a month or two ago for reference."

11 Just to be clear, you're one of the  
 12 recipients here, aren't you, on this email list?

13 **A.** Yes.

14 **Q.** We can then see below the email which had been  
 15 sent a month or two before:

16 "All,

17 "The compliance checks on submitted offender  
 18 interview case files will continue in 2012/2013.  
 19 Associated are all the supporting documents  
 20 needed, which have been amended where  
 21 appropriate. I suggest these are referred to  
 22 when you have time and/or when submitting an  
 23 offender interview case file. Some salient  
 24 points and changes are summarised as follows, to  
 25 take effect immediately where applicable ..."

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1 The salient points and changes are set out  
 2 below. We need not go through all of those but,  
 3 going down to the third bullet point from the  
 4 bottom, please:  
 5 "The Discipline Report template has been  
 6 changed. Superfluous information for Contract  
 7 Managers (eg Identification Code, HR printout at  
 8 Appendix C, etc) has been removed. Also, areas  
 9 of previous contention or concern (such as 'To  
 10 be prosecuted by', 'Designate Prosecution  
 11 Authority', etc) has been removed. This is  
 12 a disciplinary report and no decisions have been  
 13 made regarding any prosecution."  
 14 Then we have below:  
 15 "The aim will again be to conduct a minimum  
 16 of 2 compliance checks per individual and attain  
 17 a 90% average score across the team by year end.  
 18 For info, the average score last year was  
 19 92.16%.  
 20 "Compliance checks will be lapsed for now  
 21 and recommence at the beginning of July. This  
 22 will facilitate the arrival of new recruits and  
 23 any associated training, but will also provide  
 24 some flexibility in managing workloads for those  
 25 impacted in the next couple of months. Casework  
 93

1 discipline report was more towards either the  
 2 network teams, ie the contracts manager, which  
 3 held the contract with the subpostmaster, or, in  
 4 terms of a Crown branch, it would be to the line  
 5 management, as Crowns were run and owned by the  
 6 Post Office itself.  
 7 **Q.** The contents for the document start at page 2 at  
 8 the bottom, please. looking over the page,  
 9 please. Thank you. We see there "1. Offender  
 10 report", so this was the section dealing with  
 11 the offender report.  
 12 Looking, please, at the heading for item  
 13 1.24 further down the page, please, the heading  
 14 is "Details of failures in security,  
 15 supervision, procedures and product integrity".  
 16 Going, please, to the bottom of page 4 of  
 17 this document, we see the structure for  
 18 an offender report set out. So starting there,  
 19 "Offender report". Over the page, please, and  
 20 we see there an indication that  
 21 an identification Code is required, and in  
 22 brackets we see "Numbers 1 to 7 only".  
 23 We will come back to the requirements  
 24 relating to the identification of  
 25 an identification code but could we go, please,  
 95

1 will still continue to monitor the reporting  
 2 timescales to ensure we meet our stakeholder  
 3 obligations."  
 4 So we can see there, can't we, that some  
 5 changes have been made to the applicable  
 6 compliance documents and we've looked at some of  
 7 those.  
 8 Attached to Mr Posnett's email was a zip  
 9 file, if we can scroll a bit further up, please.  
 10 You see there, "Attachment: Compliance  
 11 2012-2013.zip". So a zip file of compliance  
 12 documents representing the latest versions at  
 13 that point. One of the documents was a document  
 14 entitled "Guide to the Preparation and Layout of  
 15 Investigation Red Label Case Files, Offender  
 16 Reports and Discipline Reports". Could we have  
 17 that on screen, please, the reference is  
 18 POL00038452.  
 19 Before we turn to the detail of this  
 20 document, could you just explain, please, what  
 21 you understood the difference to be between  
 22 an offender report and a discipline report?  
 23 **A.** From recollection, the offender report would be  
 24 to do with any potential suspect offender and/or  
 25 any proceedings in the criminal element. The  
 94

1 first to the substance of the heading we saw at  
 2 item 1.24. This is on page 9. Further down the  
 3 page, please, "Details of failures in security,  
 4 supervision, procedures and product integrity".  
 5 It reads as follows:  
 6 "This must be a comprehensive list of all  
 7 identified failures in security, supervision,  
 8 procedures and product integrity it must be  
 9 highlighted [in] bold in the report. Where the  
 10 Security Manager concludes that there are no  
 11 failures in security, supervision, procedures  
 12 and product integrity a statement to this effect  
 13 should be made and highlighted in bold.  
 14 "The 'Procedural failings' form (within the  
 15 'All In One Case Raise' spreadsheet) should also  
 16 be completed within 48 hours of interview and  
 17 circulated to relevant stakeholders. One of the  
 18 Stakeholders is Crime Risk, who are responsible  
 19 for capturing emerge crime trends and/or  
 20 prevalent failings that contribute to fraud  
 21 within the business."  
 22 Going now, please, to the guidance on  
 23 discipline report, further down this page. We  
 24 can see here that there is no reference to  
 25 an identification code on the template for the  
 96

1 discipline report set out here, is there?  
 2 **A.** No.  
 3 **Q.** Turning, please, to page 11 of this document,  
 4 paragraph 2.15, we have there the same heading  
 5 we saw at paragraph 1.24 relating to the  
 6 offender report. Paragraph 2.15 reads as  
 7 follows:  
 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 in the report. Where the Security Manager  
 12 concludes that there are no failures a statement  
 13 to this effect should be made and highlighted in  
 14 bold."  
 15 Underneath:  
 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  
 97

1 face, inconsistent with the requirements of the  
 2 CP&I Act relating to disclosure?  
 3 **A.** It appears to be, on the facts of that statement  
 4 there, yes.  
 5 **Q.** Because unless the information is collected  
 6 together or recorded elsewhere, it may be lost,  
 7 rather than properly disclosed to the defence?  
 8 **A.** Excuse me, I was just reading it again. From  
 9 that, I read that the -- certain information  
 10 would still be in the offender report but not in  
 11 the discipline report. That's my understanding  
 12 of that, if you're asking that question and,  
 13 therefore, it would be evident in the offender  
 14 report.  
 15 **Q.** The offender report, as we've seen, is a legally  
 16 privileged document, isn't it --  
 17 **A.** Right, yes.  
 18 **Q.** -- and therefore wouldn't be disclosed?  
 19 **A.** Apologies, yes.  
 20 **Q.** So unless that information is recorded elsewhere  
 21 ...  
 22 **A.** Yes, I understand that.  
 23 **Q.** Do you recall ever reviewing the compliance  
 24 documents that were circulated on the email you  
 25 received?

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1 security of the business. If you are in any  
 2 doubt as to the appropriateness of inclusion or  
 3 exclusion you must discuss with your Team  
 4 Leader."  
 5 Reading this now, do you see any problem  
 6 with what it says at paragraph 2.15?  
 7 **A.** Other than it mentions "not including certain  
 8 information", if that's what you mean, that's  
 9 the conflict I would look at there, having just  
 10 read that.  
 11 **Q.** Well, it's saying, isn't it, that if there are  
 12 facts and matters which undermine the prospects  
 13 of success, they must be confined solely to the  
 14 confidential offender report. So isn't this  
 15 essentially saying that, if there are facts  
 16 which support the suspect's defence or which  
 17 undermine the allegation against him, this must  
 18 be kept confidential?  
 19 **A.** It would appear to read that way, yes.  
 20 **Q.** Do you recall reading this at the time you were  
 21 in the Security team?  
 22 **A.** As per previous, I may well have read it but  
 23 I don't have recollection, given the number of  
 24 documents we've already alluded to.  
 25 **Q.** Would you agree that this instruction is, on its  
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1 **A.** From recollection again, I would have, as with  
 2 a number of documents, had an oversight or  
 3 viewed to possibly made a comment to the issuer  
 4 of those documents. But the specifics of any  
 5 document I couldn't comment on.  
 6 **Q.** I'd like to turn, please, to another document  
 7 which was contained in the compliance zip file  
 8 sent to you by Mr Posnett in 2012. This was  
 9 also contained in an earlier compliance zip file  
 10 circulated by the Security team. It is the  
 11 document entitled "Identification Codes", at  
 12 POL00118104, if we could have that on screen,  
 13 please.  
 14 Had you seen this document before it was  
 15 sent to you by the Inquiry for the purposes of  
 16 preparing your statement?  
 17 **A.** I don't recollect that specific document, no.  
 18 **Q.** Does it follow that you can't assist with who  
 19 might have drafted this document?  
 20 **A.** The only comment I would make is, when  
 21 I undertook my training, I was aware of  
 22 identification codes, as part of one's training,  
 23 however with reference to that specific  
 24 document, which clearly is offensive, racist and  
 25 inappropriate, I would not know the author of  
 100

1 that document.

2 **Q.** Before we look at the content of that document,  
3 what training did you have on identification  
4 codes and their use by Post Office  
5 Investigators?

6 **A.** With regards to identification codes, it's my  
7 recollection from numerous years ago, was that  
8 it formed part of an investigation case file  
9 that was not only Post Office but Royal Mail, as  
10 it was a corporate security. Again, where that  
11 emanated from, I don't know. I can't recollect  
12 in terms of the reasons why, other than it was  
13 part of the case file construction.

14 **Q.** So the instruction was to record  
15 an identification code?

16 **A.** Yes.

17 **SIR WYN WILLIAMS:** Was this training your training,  
18 ie back in about 2000, or was this in the  
19 additional training you got when you were  
20 looking at recovering monies via confiscation  
21 orders, et cetera?

22 **A.** Excuse me, sir, it was on my initial training,  
23 my recollection.

24 **SIR WYN WILLIAMS:** So a document like this goes back  
25 to the time of your initial training?

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1 **Q.** Do you recall looking at a document for  
2 reference to determine which code you needed to  
3 put into the report?

4 **A.** Yes.

5 **Q.** There are, in this document, seven  
6 identification codes. We see identification  
7 code 1, you'll see that "White Skinned European  
8 Types" are defined by a country. So white  
9 people are presumed to be British and British  
10 people are assumed to be white, aren't they?

11 **A.** If that's how it's termed in the document.

12 **Q.** Identification code 2, again, the document mixes  
13 up skin colour with nationality, doesn't it?

14 **A.** Yes.

15 **Q.** Identification code 3, is that language which  
16 was in use in the Post Office and Royal Mail  
17 when you worked for it?

18 **A.** I'm not aware, as I say, of that document.

19 **Q.** Do you recall that term ever being used --

20 **A.** No.

21 **Q.** -- in a spoken format?

22 **A.** Absolutely not.

23 **Q.** You see identification code 5. This relates to  
24 "Chinese/Japanese Types". It includes people  
25 who are "Siamese", Siam having become Thailand

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1 **A.** It could do but I have no recollection of that  
2 specific document, sir.

3 **SIR WYN WILLIAMS:** No, no, but let me be clear: you  
4 do have a recollection of being trained in what  
5 are called identification codes --

6 **A.** Yes.

7 **SIR WYN WILLIAMS:** -- when you were initially  
8 trained?

9 **A.** Yes.

10 **SIR WYN WILLIAMS:** I presume that -- but you tell me  
11 if I'm wrong -- that that training related to  
12 a document which then existed.

13 **A.** Yes.

14 **SIR WYN WILLIAMS:** So that my question is,  
15 a document of this type, dealing with  
16 identification codes, existed from about 2000?

17 **A.** I would guess probably earlier, sir.

18 **SIR WYN WILLIAMS:** Earlier, all right. Fine.

19 **MS PRICE:** Did you ever complete an offender report,  
20 as they were called, where you had to enter  
21 an identification code?

22 **A.** From the cases, and mine were primarily the  
23 physical side of the business, I would have said  
24 yes, but I don't recall the specifics of those  
25 particular cases.

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1 in 1939.

2 Identification code 6, "Arabian/Egyptian  
3 Types", are referred to in contrast to  
4 identification code 3, and seem to have come  
5 from North African countries.

6 Is it your evidence that you don't recall  
7 seeing this document?

8 **A.** Yes.

9 **Q.** But, as far as you're aware, until you left the  
10 Post Office in 2015, were Investigators in the  
11 Security team being directed to enter  
12 an identification code onto the offender report?

13 **A.** I don't recall it specifically but, if it was on  
14 the -- as you alluded to earlier, on one of the  
15 documents, ID codes were there, then that would  
16 have been included.

17 **Q.** There was a review of Post Office investigation  
18 forms which took place towards the end of 2012,  
19 wasn't there?

20 **A.** Yes, but I'm not aware specifically.

21 **Q.** I think you've been fairly recently provided  
22 with an email on the subject which was sent to  
23 you in December 2012. Could we have that on  
24 screen, please. The reference is POL00118289.  
25 This is email is from Dave Posnett to Rob King,

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1 Jarnail Singh and yourself, copied to others,  
 2 dated 18 December 2012. Dave Posnett says this:  
 3 "All,  
 4 "Myself and Graham have now reviewed all POL  
 5 investigation forms (now with POL headings,  
 6 removal of RMG text and new version numbers  
 7 added).  
 8 "Associated is a zip file containing:  
 9 "Live Forms and an Index (those which we  
 10 think are still relevant and applicable to the  
 11 Investigator).  
 12 "Obsolete Forms and an Index (those which we  
 13 think are now irrelevant but will be retained  
 14 for future use if deemed relevant).  
 15 "Rob/Andy/Jarnail -- As per the Working  
 16 Group agreement, could I ask that you examine  
 17 the Live Forms and Obsolete Forms and sanction  
 18 what we have done.  
 19 "Any disagreements or other comments should  
 20 be fed back to me."  
 21 First of all, what was the Working Group  
 22 Agreement which Mr Posnett was referring to?  
 23 **A.** Unfortunately, I have no recollection of that  
 24 term.  
 25 **Q.** Do you recall this review of Post Office  
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1 reference is POL00118290. We see the title  
 2 there: "Index to GS OBSOLETE Investigation  
 3 Forms".  
 4 Again, this is a three-page document listing  
 5 investigation forms, which all have a form  
 6 reference number. Could we just scroll through  
 7 it, please. The identification codes document  
 8 does not appear on this index either, does it?  
 9 **A.** No.  
 10 **Q.** Would the identification codes document have  
 11 been classed as a form for the purposes of this  
 12 review?  
 13 **A.** I couldn't comment on that. I don't know.  
 14 **Q.** When this review was being conducted, as far as  
 15 you can recall, did anyone raise the  
 16 identification codes document as being one which  
 17 should be made obsolete or, at the very least,  
 18 amended?  
 19 **A.** No.  
 20 **MS PRICE:** Sir, unless you have any questions on  
 21 this part of the questioning, that may be  
 22 a convenient moment to take lunch.  
 23 **SIR WYN WILLIAMS:** Yes, certainly. So 2.00?  
 24 **MS PRICE:** Yes, sir, thank you.  
 25 **SIR WYN WILLIAMS:** Fine.  
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1 investigation forms now?  
 2 **A.** I remember the forms because of the separation  
 3 and they were always -- as previous documents  
 4 have shown, were Royal Mail Group. There was  
 5 a desire/requirement that, as we were a separate  
 6 business, that the documents were headed and  
 7 referenced "Post Office Only".  
 8 **Q.** We have the indices referred to by Mr Posnett,  
 9 starting, please, with the index to the "Live  
 10 Forms", the ones which were considered still  
 11 relevant and applicable to the investigation.  
 12 The reference is POL00118377.  
 13 If we can just scroll through this document,  
 14 please, we can see it is three pages long and it  
 15 contains a list of forms, all of which appear to  
 16 have a reference number, don't they?  
 17 **A.** Yes.  
 18 **Q.** You've had an opportunity to look through the  
 19 indices before giving your evidence, albeit  
 20 I think quite recently. The identification  
 21 codes document is not listed on this index, is  
 22 it, ie the live forms index?  
 23 **A.** No.  
 24 **Q.** Can we look, please, to the index to the  
 25 "Obsolete Forms", referred to by Mr Posnett, the  
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1 **(1.00 pm)**  
 2 **(The Short Adjournment)**  
 3 **(1.59 pm)**  
 4 **MS PRICE:** Good afternoon, sir. Can you see and  
 5 hear us?  
 6 **SIR WYN WILLIAMS:** Thank you. I can, yes.  
 7 **MS PRICE:** Mr Hayward, I would like to move, please,  
 8 to the question of your understanding of the  
 9 Horizon System and Horizon System data. The  
 10 Horizon IT System was introduced in the year  
 11 2000, by which time you had joined the Security  
 12 team, hadn't you?  
 13 **A.** Yes.  
 14 **Q.** Do you recall being aware of Horizon's  
 15 introduction?  
 16 **A.** In my early years in the Security team, no,  
 17 because my focus, as previously stated this  
 18 morning was from the physical side, the cash  
 19 centre/cash-in-transit operation. So I may have  
 20 had an awareness but not a great recollection or  
 21 dealings with the Horizon System.  
 22 **Q.** Does it follow from this that you weren't given  
 23 any briefing or training relating to the Horizon  
 24 System when you first joined the Security team?  
 25 **A.** No.  
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1 Q. When did you first become aware of the role  
2 which the Horizon System played in the  
3 investigation of discrepancies between the  
4 accounts and the physical holdings of cash and  
5 stock?  
6 A. I couldn't specify a particular moment in time  
7 because between 2000 and 2008 I was undertaking  
8 various tasks. It would probably be to the  
9 latter time of that period, as noted in my  
10 witness statement, towards the back end of 2008.  
11 Q. Did you ever have any briefing or training on  
12 the operation of the Horizon System?  
13 A. No.  
14 Q. At any point before your departure from the Post  
15 Office, were you briefed on how the Horizon  
16 System and its audit data might be interrogated  
17 to inform investigation of subpostmasters and  
18 others?  
19 A. From recollection, I had what I would term was  
20 an overview. So in terms of how the system  
21 operated, how information was derived from the  
22 various sources, that would form part of the  
23 fraud risk programme activity but I would state  
24 that there are those individuals that sat  
25 beneath me or reported that were far more

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1 knowledge of that. But there are other areas  
2 that because -- the Post Office operated  
3 a number of systems, Horizon being the main one  
4 for the counter, but there are other  
5 data-capturing areas. But again, through the  
6 fraud risk and fraud forum activities, they were  
7 brought to the table by other parties.  
8 Q. It's right, isn't it, that when the Criminal Law  
9 Team provided advice on prosecution -- and you  
10 saw a number of instances of those legal memos,  
11 didn't you, when you were authorising  
12 prosecutions -- that they would request  
13 confirmation of whether there was any material  
14 which might reasonably be capable of undermining  
15 the prosecution case or assisting the defence  
16 case, which had not already been disclosed? Do  
17 you remember that paragraph in the legal memos  
18 you were looking at?  
19 A. I have a vague recollection, yes.  
20 Q. In practice, once the legal team had advised  
21 that there was sufficient evidence for  
22 a prosecution, did the Security team carry out  
23 any further inquiries or investigations?  
24 A. Unless requested to do so, not to my knowledge.  
25 Q. So unless the Legal team requested you to do

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1 experienced in those fields and, therefore, one  
2 didn't get involved in the finer detail.  
3 Q. You have said at paragraph 38 of your statement  
4 to the Inquiry that analysing Horizon data was  
5 not within your specific remit and was  
6 undertaken by other members of the Security  
7 team. Is that what you mean by others with  
8 greater experience?  
9 A. Yes.  
10 Q. Were you ever involved in requesting data from  
11 Fujitsu?  
12 A. Not personally, no.  
13 Q. At the time you worked in the Security team, did  
14 you understand what Audit Record Query data was?  
15 A. I was aware of the terminology but not the  
16 specifics of actually requesting it myself.  
17 Q. To your knowledge, was there any other type of  
18 material or evidence which was obtained by the  
19 Security team in relation to prosecutions where  
20 an apparent shortfall had been identified, apart  
21 from that ARQ data?  
22 A. I was aware that there were other areas that  
23 could be interrogated. With regards to specific  
24 recollection, I can't. There was one system,  
25 Credence but, again, I don't have specific great

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1 further inquiries or investigations, was the  
2 Security team position that it was now for the  
3 Legal team to deal with?  
4 A. That was my understanding.  
5 Q. In relation to the occasions on which you  
6 authorised prosecutions, did you ever direct  
7 that further inquiries or investigations be  
8 carried out by your team after you received the  
9 request for authority to proceed?  
10 A. Not that I can recall, no.  
11 Q. It may follow from your earlier answers but were  
12 you ever trained on how to interpret or  
13 interrogate data attained from Fujitsu?  
14 A. Not in detail, no.  
15 Q. When you say "not in detail" --  
16 A. So I wasn't experienced in terms of looking at  
17 the data and being able to analyse it. There  
18 are those that did that in the first instance.  
19 Q. As far as you were aware, were there people  
20 within your team, that is Security team  
21 Investigators, who did have the level of  
22 technical skill to analyse the Fujitsu data?  
23 A. I would -- my observation was that the  
24 Investigators would have that availability, yes.  
25 Q. Were you aware at any time that there were bugs,

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1 errors or defects in the Horizon System that  
 2 could affect balancing and could, therefore,  
 3 create accounting discrepancies?  
 4 **A.** From a personal perspective, I was never made  
 5 aware, in my time, that there were bugs in the  
 6 system. When there were challenges, it was the  
 7 information technology, IT, teams that, in the  
 8 initial instances, would investigate or the  
 9 comment that was -- often came back was that any  
 10 system, whatever walk of life, has issues that  
 11 are fixed but there were no -- what one would  
 12 term and came out later -- bugs that would  
 13 affect the work undertaken.  
 14 **Q.** To the extent that there were system issues with  
 15 Horizon, which meant that subpostmasters found  
 16 balancing difficult, do you think it would have  
 17 been helpful for all those teams we saw listed  
 18 as stakeholders, in the "Former subpostmaster  
 19 End-to-end debt review", that long list, to have  
 20 been made aware of that?  
 21 **A.** With the benefit of hindsight, yes.  
 22 **Q.** You say at paragraph 41 of your statement to the  
 23 Inquiry that challenges to the integrity of  
 24 Horizon were not within your remit and were  
 25 dealt with by the Information Security team but

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1 "Andy called me and asked whether you guys,  
 2 (Graham, if FIU have any cases in dispute/new  
 3 issues that could affect your case) could put  
 4 together some stats on these cases where the  
 5 accused's defence was/is that the Horizon data  
 6 is unreliable for any amount of reasons given by  
 7 the accused.

8 "This should be sent to Iain within the next  
 9 few days. Iain will need as much information as  
 10 possible.

11 "Regards,  
 12 "Andrew."

13 Is the "Andy" there you? You're copied in  
 14 to this email?

15 **A.** On the basis of those comments, there, I would  
 16 say, yes.

17 **Q.** Do you recall this request?

18 **A.** Not in specific terms, no.

19 **Q.** Looking at the date on this email here, does it  
 20 assist you with when you first became aware of  
 21 challenges to the integrity of Horizon?

22 **A.** In specific date terms, no, but obviously the  
 23 date there in 2010, I would have been aware, by  
 24 nature of the email content.

25 **Q.** Going, please, to page 1 of this document again,

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1 you were aware of some such challenges when they  
 2 came to light, weren't you, because you were  
 3 involved in some correspondence about them?

4 **A.** Yes. So, by that statement there, I mean that,  
 5 in terms of leading on the Horizon integrity  
 6 issues, the Information Security team led on  
 7 that. They would have made requests, as I've  
 8 noted in one of the bundle emails, that  
 9 information would have been requested to the  
 10 Investigations team -- or the Operations team,  
 11 rather, for information regarding any specific  
 12 request for information, and that would have  
 13 been given to an individual to make that request  
 14 available.

15 **Q.** Could we have on screen, please, POL00106867.  
 16 This is a lengthy email chain and the last  
 17 email, which we can see here is on page 1,  
 18 3 March 2010. Could we go, please, to the last  
 19 page in this document, page 28, to the first  
 20 email in the chain, please. Scrolling down  
 21 a little bit please.

22 This is an email from Andrew Daley to Jason  
 23 Collins and Graham Brander and it's copied to  
 24 you, and it reads as follows:

25 "Jason/Graham.

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1 this is an email from Rob Wilson to Dave Posnett  
 2 and Doug Evans and copied to you, among others.  
 3 Have you had a chance to read this email ahead  
 4 of giving your evidence? It is one of the, I'm  
 5 afraid, many documents that came to you in  
 6 fairly recent times?

7 **A.** I would have read it. Whether I could digest  
 8 and fully soak in all of the information is open  
 9 to question, given the time permitted.

10 **Q.** This email relates to whether an internal  
 11 investigation into the integrity of Horizon  
 12 would be disclosable in criminal proceedings,  
 13 where Horizon data was relied upon. It sets out  
 14 Rob Wilson's view in relation to this. Did you  
 15 have or express any views on this issue as  
 16 a result of being copied into this email, as far  
 17 as you are aware?

18 **A.** As far as I'm aware, no.

19 **Q.** You have addressed your involvement in issues  
 20 regarding Horizon integrity further at  
 21 paragraph 47 of your statement to the Inquiry.  
 22 Could we have this on screen, please,  
 23 Mr Hayward's statement which is WITN -- page 14,  
 24 please, scrolling a little further down, please,  
 25 to paragraph 47.

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1 You're referring to a document there where  
2 you were made aware of issues raised regarding  
3 Horizon integrity:

4 "... although I had no direct involvement in  
5 dealing with these matters from  
6 an operational/IT perspective. This was being  
7 led by other teams within the business. With  
8 regards to the Security team, updates were  
9 provided via the Head of Security (JS) ..."  
10 Is that John Scott?

11 **A.** It is.

12 **Q.** "... in summary these being that the Horizon  
13 integrity issues were being reviewed. From  
14 an investigation perspective, we were instructed  
15 by JS that any investigation case files that  
16 were subject to Horizon integrity challenges be  
17 passed to the Criminal Law Team/Cartwright King  
18 for review and decision on progression. JS also  
19 requested that All case files were passed to  
20 himself for personal review. I cannot recollect  
21 specific cases in relation to this."

22 You have been provided with a number of  
23 emails ahead of giving your evidence which show  
24 that you were copied in on a number of email  
25 chains about challenges to the integrity of the

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1 job can be said to be testing, stressful, on  
2 occasions. From a personal viewpoint, I had  
3 a long career in the Post Office. I don't  
4 want -- it's not about me, this Inquiry but the  
5 Security team was a very testing environment by  
6 nature of the work, not just from a fraud  
7 perspective but also from the physical side,  
8 because it was a 24/7 role, it didn't mean we  
9 worked 24/7, but burglars don't operate 9 to 5  
10 so we operated around all times of day and  
11 night. It was an interesting role.

12 In the latter part of my career, I would say  
13 in the last couple of years, it became a very  
14 testing, toxic environment within the Security  
15 team. There was a very much for me, a command  
16 and control operation that worked. One, again,  
17 from a personal perspective, didn't challenge,  
18 if you did, it was probably frowned upon.  
19 That's a very broadbrush set of statements to  
20 make, but that's from a personal perspective.

21 **Q.** Had you had any concerns about the way that the  
22 Security team operated, would you have felt able  
23 to raise them?

24 **A.** Not in terms of anything to do with Horizon  
25 integrity issues. That probably wasn't the

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1 Horizon System and you also appear to have  
2 attended at least one of the regular Horizon  
3 calls in August 2013. Has sight of these  
4 additional documents changed your evidence as  
5 set out in this paragraph at all?

6 **A.** No.

7 **Q.** You say that updates on Horizon integrity were  
8 provided via the Head of Security, John Scott.  
9 From an investigation perspective, you say that  
10 you were instructed by John Scott that any  
11 investigation case files subject of Horizon  
12 integrity challenges be passed to the Criminal  
13 Law Team/Cartwright King but also that John  
14 Scott requested that all case files be passed to  
15 him for personal review. Was this all case  
16 files or just those that relied on Horizon data?

17 **A.** On recollection, I do believe, although he would  
18 himself confirm this, that we -- he saw all case  
19 files.

20 **Q.** Mr Hayward, we're coming to the end of the  
21 questions which I have for you. The last topic  
22 I wish to ask you about is the working  
23 environment within the Security team. What was  
24 it like, working in the Security team?

25 **A.** Mindful of the Inquiry, any walk of life, one's

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1 means of my comments there. It was more about  
2 the way the Security team in general was run.  
3 My term "command and control" certainly came to  
4 the front more. One was always very conscious  
5 for one's career, and I mean that very, very  
6 pointedly because, if one raised certain  
7 challenge, you were very wary of where that  
8 would take you.

9 So, again, that is a broadbrush statement  
10 but I'm very conscious of individuals. So ...

11 **Q.** Where was this coming from?

12 **A.** For me, personally, from the Head of Security,  
13 John Scott.

14 **MS PRICE:** Sir, those are all the questions I have  
15 for Mr Hayward. Do you have questions?

16 **SIR WYN WILLIAMS:** Well, not at the moment. Are  
17 there questions from anyone else?

18 **MS PRICE:** There are questions from Ms Page.

19 **SIR WYN WILLIAMS:** Right. Okay, let's hear those  
20 first, anyway.

21 **Questioned by MS PAGE**

22 **MS PAGE:** Mr Hayward, I appear for a number of  
23 subpostmasters in this Inquiry. What I'd like  
24 to ask about is the information that was  
25 collected from the forms that you were taken to

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1 in the zip files, because we saw a reference to  
 2 the fact that information was put together for  
 3 fraud risk purposes and that was obviously your  
 4 responsibility for a period of time, wasn't it?  
 5 **A.** Yes.  
 6 **Q.** So, presumably, those various forms that were  
 7 used and the data that was collected on them was  
 8 collated for the purposes of analysing fraud  
 9 risk?  
 10 **A.** Yes.  
 11 **Q.** So, presumably, that also would have included  
 12 the information about identification codes?  
 13 **A.** That was never evident in any of the information  
 14 that we collected.  
 15 **Q.** So are you saying that, although you collated  
 16 other evidence of information, data, and so  
 17 forth, from those forms, there was never any  
 18 evidence collated from the ID codes documents?  
 19 **A.** No, the evidence -- for reference, in answer to  
 20 your question, was if a particular product or  
 21 service that was offered by the Post Office was  
 22 subject to an activity, so for example, postage  
 23 labels, then information on branches and the  
 24 levels of turnover of said item or product, that  
 25 was the information that was gathered for  
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1 Participant questions.  
 2 **Questioned by SIR WYN WILLIAMS**  
 3 **SIR WYN WILLIAMS:** There's just one line of short  
 4 questions I want to ask, Mr Haywood, to make  
 5 sure that I'm understanding, really, the oral  
 6 evidence you gave.  
 7 Before the morning break, I think it was,  
 8 counsel asked you whether it was normal for  
 9 investigations of alleged criminal activity to  
 10 result in criminal prosecutions. All right?  
 11 **A.** Yes.  
 12 **SIR WYN WILLIAMS:** That may not be precisely how she  
 13 put it but I think that was the purport of what  
 14 she had to say. You said, "No", which perhaps  
 15 wasn't the answer that she or even I was  
 16 expecting. But, be that as it may for the  
 17 moment, you then went on to say that there might  
 18 be -- I'm not holding you to these figures, so  
 19 please understand that -- say, 250  
 20 investigations in one year but only 50  
 21 prosecutions. All right?  
 22 **A.** Yes.  
 23 **SIR WYN WILLIAMS:** You made it clear that that was  
 24 an estimate and not precise. What I want to  
 25 understand is were you then talking about the  
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1 analysis purposes and various activities  
 2 thereafter.  
 3 **Q.** When you were an Investigator yourself and you  
 4 were gathering information about identification,  
 5 what did you do it with reference to?  
 6 **A.** I don't have particular knowledge nor  
 7 recollection of those particular ID codes. As  
 8 I stated previously, it was within a number of  
 9 areas to collect information. What happened to  
 10 that thereafter, I do not know and I've no  
 11 recollection of.  
 12 **Q.** What number would you have used if you were  
 13 investigating somebody who was white?  
 14 **A.** Based on what I've seen, it would be an ID  
 15 code 1.  
 16 **Q.** So how did you know that?  
 17 **A.** Because I've seen it on this screen.  
 18 **Q.** How did you know it at the time?  
 19 **A.** I can't recollect some years ago.  
 20 **Q.** Is your lack of recollection of the ID codes  
 21 convenient, Mr Hayward?  
 22 **A.** No, it isn't. Absolutely not.  
 23 **MS PAGE:** Thank you. Those are my questions.  
 24 **SIR WYN WILLIAMS:** Anyone else?  
 25 **MS PRICE:** No, sir, I think that's it from Core  
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1 complete number of investigations in a year and  
 2 the complete number of prosecutions in a year,  
 3 as best you could, or were you confining your  
 4 answers to investigations about fraud in  
 5 branches or theft in branches and those which  
 6 ended up in prosecutions?  
 7 Am I making myself clear?  
 8 **A.** Yes, sir. In reply to that, I would say, from  
 9 my recollection, the 250 cases, circa, were  
 10 investigation case files that were opened.  
 11 I couldn't give you the specific details of  
 12 X-number of fraud cases versus other primarily,  
 13 and that the --  
 14 **SIR WYN WILLIAMS:** You were -- just to shortcut it  
 15 you were trying to estimate the whole number of  
 16 investigations of whatever type of criminality  
 17 in one year?  
 18 **A.** Yes.  
 19 **SIR WYN WILLIAMS:** Similarly, in relation to  
 20 prosecutions, were you attempting to assess the  
 21 number of prosecutions in one year of whatever  
 22 type or was that more confined to fraud/theft in  
 23 branches --  
 24 **A.** That would be the --  
 25 **SIR WYN WILLIAMS:** -- and I'll tell you, there's  
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1 a reason for that. But we've been told in  
 2 various -- with various degrees of purported  
 3 accuracy that, over the period between 2000 and  
 4 2013, there were approximately 700 people who  
 5 may have been wrongly convicted of theft, false  
 6 accounting. We're still to investigate that  
 7 more fully, so please understand that.  
 8 **A.** Absolutely.  
 9 **SIR WYN WILLIAMS:** But that, as it happens, would  
 10 equate to about 50 a year, if you averaged it  
 11 out, sort of thing.  
 12 **A.** Yes.  
 13 **SIR WYN WILLIAMS:** Again, I wanted to be clear what  
 14 you were describing to me.  
 15 **A.** So, sir, again, my understanding was, of those  
 16 50, that covered the whole piece, in terms of  
 17 investigations, rather than the categorisation  
 18 of where those investigations commenced.  
 19 **SIR WYN WILLIAMS:** Right. I'm with you. Thank you  
 20 very much.  
 21 **THE WITNESS:** Thank you.  
 22 **SIR WYN WILLIAMS:** Right. Well, thank you very much  
 23 for your witness statement and thank you for  
 24 answering a good many questions today. I'm  
 25 grateful to you.

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 2 **SIR WYN WILLIAMS:** So that's it for today, Ms Price?  
 3 **MS PRICE:** Yes, sir, commencing again at 10.00  
 4 tomorrow.  
 5 **SIR WYN WILLIAMS:** With?  
 6 **MS PRICE:** With John Scott, sir.  
 7 **SIR WYN WILLIAMS:** I must have heard Mr Scott's name  
 8 on very many occasions today and momentarily it  
 9 went out of my head, so thank you very much.  
 10 **MS PRICE:** Thank you, sir.  
 11 **SIR WYN WILLIAMS:** See you in the morning.  
 12 **(2.25 pm)**  
 13 **(The hearing adjourned until 10.00 am**  
 14 **the following day)**  
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