

Thursday, 12 October 2023

1  
2 (10.00 am)  
3 **MR BEER:** Good morning, sir, can you see and hear  
4 me?  
5 **SIR WYN WILLIAMS:** Yes, I can, thank you.  
6 **MR BEER:** May I call Robert Wilson, please.  
7 **SIR WYN WILLIAMS:** Yes.  
8 **ROBERT GEORGE WILSON (sworn)**  
9 **Questioned by MR BEER**  
10 **MR BEER:** Good morning, Mr Wilson. As you know, my  
11 name is Jason Beer and I ask questions on behalf  
12 of the Inquiry. Can you give us your full name,  
13 please?  
14 **A.** Do you wish me to stand?  
15 **Q.** No, you can remain seated. Please do.  
16 **A.** Robert George Wilson.  
17 **Q.** Thank you very much for coming to give evidence  
18 to the Inquiry today and for the provision  
19 previously of a witness statement. Before I ask  
20 you questions about that witness statement and  
21 indeed other questions, the Chairman, I think,  
22 will deliver a warning.  
23 **SIR WYN WILLIAMS:** Good morning, Mr Wilson, you're  
24 giving evidence today and my understanding is  
25 that you will, in all probability, return to  
1

1 objection to answering the question and  
2 thereafter rule upon whether your objection  
3 should be upheld.  
4 I understand from Mr Beer that you have  
5 received legal assistance in respect of giving  
6 evidence to the Inquiry but that you are not  
7 represented at the Inquiry today.  
8 I don't anticipate that that will prove to  
9 be a problem but, if I am wrong in that  
10 anticipation and at any stage during your  
11 questioning you ask my permission to seek advice  
12 from a lawyer, I will consider what you have to  
13 say about it at that point and make a decision.  
14 Do you understand everything that I've said,  
15 Mr Wilson?  
16 **A.** Yes, sir.  
17 **SIR WYN WILLIAMS:** Thank you.  
18 All right, carry on then, please, Mr Beer.  
19 **MR BEER:** Thank you.  
20 Mr Wilson, you should have in front of you  
21 a hard copy of a witness statement in your name,  
22 dated 11 May 2023.  
23 **A.** Yes.  
24 **Q.** I think there are three corrections that you  
25 would like to make to it.

3

1 give evidence on a separate occasion before  
2 Christmas. So what I'm about to say relates to  
3 both those occasions. You're probably aware,  
4 given that you're a solicitor, that a witness at  
5 a public inquiry has the right to decline to  
6 answer questions put to him by Counsel to the  
7 Inquiry by any other recognised legal  
8 representative, or indeed by me, if there is  
9 a risk that the answers to those questions will  
10 incriminate the witness. This legal principle  
11 is known in shorthand form as the privilege  
12 against self-incrimination.

13 Mr Wilson, I've decided that fairness  
14 demands that I remind you of that privilege  
15 before you begin your evidence. I should also  
16 say, however, that it is for you to make clear  
17 to me in respect of any questions put to you  
18 that it is your wish to rely upon the privilege,  
19 if that is indeed your wish. If, therefore,  
20 questions are put to you by any of the lawyers  
21 who ask questions, or by me, which you do not  
22 wish to answer, on the ground that to answer  
23 such questions might incriminate you, you must  
24 tell me immediately after such question is put.

25 At that point, I will consider your

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1 **A.** Yes.  
2 **Q.** If we can display on it so everyone can see,  
3 WITN04210100. I think the first correction that  
4 you wish to make is on page 21 at paragraph 44.  
5 **A.** Yes, that's correct.  
6 **Q.** You'll see in the second line there's a sentence  
7 that begins "Having conducted previous trials  
8 counsel".  
9 **A.** I think it's "When the Horizon IT System".  
10 **Q.** Yes, so if we scroll down, so it's the second  
11 line:  
12 "When the Horizon IT System was first  
13 implemented, I instructed senior counsel who had  
14 undertaken a number of prosecutions ... to  
15 provide an advice for the [Criminal Law Team].  
16 I understand it included specific wording to  
17 cover the production of computer records ... and  
18 wording to cover the production of business  
19 records ... Counsel instructed had also received  
20 training on a computer terminal that would be  
21 used by [subpostmasters], counter clerks and  
22 staff conducting transactions with members of  
23 the public. I cannot now recall the full extent  
24 of the advice prepared by counsel but recall  
25 that it was a detailed advice."

4

1 Do you wish to delete the entirety of --  
 2 **A.** I do.  
 3 **Q.** -- the sentences that I've just read?  
 4 **A.** Yes, I do.  
 5 **Q.** So from the words "When the Horizon IT System  
 6 was first implemented" all the way down to  
 7 "detailed advice"?  
 8 **A.** Yes, please.  
 9 **Q.** Secondly if we turn, please, all the way down to  
 10 page 24 and it's paragraph 52 at the top, you  
 11 say:  
 12 "The CLT did not prepare a generic witness  
 13 statement for expert witnesses. I cannot recall  
 14 comparing witness statements generated by anyone  
 15 at [the Post Office] or Fujitsu for use in  
 16 criminal cases ..."  
 17 Do you wish to delete the remainder of the  
 18 sentence from "so am unable"?  
 19 **A.** Yes, that's correct.  
 20 **Q.** To the end of the sentence?  
 21 **A.** Yes.  
 22 **Q.** Then, thirdly, please, on page 30 at  
 23 paragraph 72 -- if we just scroll up a bit so we  
 24 can get the context, please, a little bit  
 25 further -- you're dealing here in paragraph 71

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1 Just before we get into the detail, can we  
 2 go back to page 21, please, of your witness  
 3 statement. The passage that is highlighted,  
 4 could you explain to us just in general terms,  
 5 please, why you now wish for that to be deleted  
 6 from your signed witness statement?  
 7 **A.** Yes. I changed representation --  
 8 **Q.** Stop there. If you can give the answer in a way  
 9 that does not involve telling us about  
 10 communications between you and your lawyers,  
 11 that may be preferable. It's a matter for you  
 12 whether you include in your answer any reference  
 13 to such communications. But if you do refer to  
 14 such communications, there's a chance that you  
 15 waive privilege over those communications and  
 16 other communications. So just be aware that,  
 17 when giving the explanation, it may not be  
 18 necessary for you to involve communications with  
 19 the lawyers.  
 20 **A.** Basically, I recently reread my statement and,  
 21 for some reason, I don't know why, but it  
 22 suddenly occurred to me that, in fact, I wasn't  
 23 in charge at the time Horizon was implemented.  
 24 The reason I was specific about counsel and  
 25 named counsel to the inquiry is because he was

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1 and 72 with an email that Mr Simpson sent to you  
 2 in October 2010. In paragraph 72, you say:  
 3 "I do not know what the issue was that had  
 4 been reported by Fujitsu and concerned  
 5 Mr Simpson."  
 6 Do you now wish to delete those words in  
 7 that paragraph?  
 8 **A.** I do.  
 9 **Q.** The entirety of paragraph 72?  
 10 **A.** Yes, I do.  
 11 **Q.** With those three amendments, are the contents of  
 12 the witness statement true to the best of your  
 13 knowledge and belief?  
 14 **A.** Yes.  
 15 **Q.** As the Chairman has said, I am only going to be  
 16 asking you a limited number of questions  
 17 relating to Phase 4 of the Inquiry today,  
 18 because you're coming back on 12 December,  
 19 kindly, to give us evidence on some case  
 20 studies --  
 21 **A.** Yes.  
 22 **Q.** -- that we're conducting and three, in  
 23 particular, in which you were involved. I'm not  
 24 going to ask you about the detail of any of  
 25 those three case studies today.

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1 someone who, on a regular basis, almost  
 2 exclusively gave me written advice which was  
 3 thorough and I worked with him on a number of  
 4 issues.  
 5 **Q.** What was his name?  
 6 **A.** Stephen John.  
 7 **Q.** Sorry, carry on.  
 8 **A.** And that's why I was so specific about who --  
 9 counsel and, so far as the other details that  
 10 are in there, I had a picture in my brain of  
 11 what the advice looked like but it was  
 12 a completely false picture and I don't know why  
 13 I believed that I was in charge at the time, and  
 14 it was only when I reread the statement  
 15 recently.  
 16 **Q.** In the fourth line there, you say:  
 17 "I understand that it included specific  
 18 wording to cover the production of computer  
 19 records."  
 20 The "it" being counsel's advice?  
 21 **A.** Yes.  
 22 **Q.** You used the words "I understand". From where  
 23 did you get that understanding when you were  
 24 writing the statement?  
 25 **A.** From -- I had a picture in my brain of that

8

1 piece of evidence.

2 **Q.** The words "I understand" may suggest that you  
3 had been told the information by somebody else,  
4 rather than "I recall that it included",  
5 "I believe that it included" or even "It  
6 included"?

7 **A.** No, nobody told me.

8 **Q.** Why did you use the words "I understand"?

9 **A.** Loose terminology. I don't know why I used the  
10 words.

11 **Q.** At the end of the paragraph, you say:  
12 "Counsel instructed had ... received  
13 training on a computer terminal that would be  
14 used by [subpostmasters and others]."  
15 Is that in fact true?

16 **A.** Yes, that --

17 **Q.** So that did apply to Mr John?

18 **A.** Yes, it did.

19 **Q.** You said the reason that you recently recalled  
20 that you had not commissioned this advice was  
21 that you realised that you were not in charge  
22 when the Horizon IT System was first  
23 implemented --

24 **A.** Yes.

25 **Q.** -- ie about 1999/2000?

9

1 **Q.** -- has asked the Post Office to search for  
2 a copy of the advice and there has been a nil  
3 return?

4 **A.** No.

5 **Q.** That hasn't played any part in your decision to  
6 wish to delete this part of the paragraph?

7 **A.** No.

8 **Q.** Thank you. Can we move on to page 24, please.  
9 It's the words from "so am unable to say  
10 whether a generic statement had been developed  
11 either by POL or Fujitsu for their witnesses",  
12 that you wanted to delete.

13 **A.** Yes.

14 **Q.** I think the explanation may be more  
15 straightforward in this respect. Can you just  
16 explain why you wish to delete that?

17 **A.** I received an additional bundle about a week ago  
18 and in the additional bundle was a generic  
19 statement.

20 **Q.** So a generic witness statement for witnesses  
21 giving evidence, which we're going to look at  
22 later today --

23 **A.** Yes.

24 **Q.** -- you've now seen that and so you realise that  
25 that what was said there is incorrect?

11

1 **A.** Yes.

2 **Q.** Would you have needed to have been in charge in  
3 order to have instructed counsel to provide  
4 an advice?

5 **A.** Not necessarily, no.

6 **Q.** Why did your memory of you not being in charge  
7 prompt you to wish to delete this paragraph,  
8 then?

9 **A.** Because when I realised when I'd rejoined the  
10 team in 2002, in May of that year, I realised  
11 that I wasn't in charge at the time.

12 **Q.** But why would not being in charge mean that you,  
13 as a "mere", in inverted comma, member of the  
14 team could not nonetheless commission advice?

15 **A.** I don't think I was asked to do that --  
16 undertake that task.

17 **Q.** It's quite a detailed recollection that you  
18 include here, albeit it ends with the words:  
19 "I cannot ... recall the full extent of the  
20 advice ..."

21 **A.** Yes.

22 **Q.** Have you received any information from anyone  
23 that the Inquiry has searched for a copy of that  
24 advice, and --

25 **A.** No.

10

1 **A.** Yes, that's right.

2 **Q.** Does the same go for the third correction?

3 **A.** It does.

4 **Q.** The later provision of documents showed that  
5 your memory was incorrect?

6 **A.** Exactly.

7 **Q.** Thank you.  
8 Can I start, please, with your career,  
9 qualifications and experience. I think you're  
10 a solicitor, is this right, having qualified in  
11 October 1980?

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

13 **Q.** So that means that when addressing the events  
14 with which we're concerned, between the  
15 introduction of Horizon in 2000 and you moving  
16 over to the Royal Mail Group in April 2012, you  
17 would have had between 20 and 32 years'  
18 post-qualification experience?

19 **A.** Yes.

20 **Q.** Before you joined the Post Office in mid-1986,  
21 I think you had previously worked for a short  
22 period of time as a court clerk in the  
23 Magistrates Court; is that right?

24 **A.** That's correct.

25 **Q.** You then worked as a prosecuting solicitor for

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1 the Northumbria Police; is that right?

2 **A.** I did, yes.

3 **Q.** Is that before the advent of the Crown  
4 Prosecution Service?

5 **A.** Yes, I transferred across into the CPS from  
6 Northumbria Police.

7 **Q.** That's when the prosecuting responsibility used  
8 to fall to, essentially, the county solicitors?

9 **A.** Yes.

10 **Q.** Then was it 1985, upon the creation of the CPS,  
11 that you moved across?

12 **A.** To Post Office Limited?

13 **Q.** No, from Northumbria Police --

14 **A.** Oh, yes.

15 **Q.** -- to the Crown Prosecution Service?

16 **A.** Yes, it was a TUPE transfer.

17 **Q.** Then, as you said, in mid '86, you moved across  
18 to the Post Office?

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

20 **Q.** Can you explain in summary form, please, the  
21 nature of the regulatory obligations of  
22 an in-house solicitor, as you understand them?

23 **A.** My duties?

24 **Q.** Yes.

25 **A.** My principal duty was to run the prosecution

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1 your professional duties as a solicitor and how  
2 they sat with your duties to your employer as  
3 an in-house solicitor?

4 **A.** My duties as a solicitor were to be independent  
5 and objective in terms of prosecuting offenders,  
6 which I felt that I was, throughout the --  
7 throughout my employment with Post Office and  
8 Royal Mail.

9 **Q.** Did you understand those duties to include  
10 an obligation or a duty owed to the court as  
11 an officer of the court?

12 **A.** Yes.

13 **Q.** Some research published by the Solicitors  
14 Regulation Authority has suggested that some  
15 in-house solicitors may have not had the support  
16 and internal controls within their organisations  
17 to maintain their independence and that this may  
18 be particularly risky where the commercial  
19 interests of the organisation are not in  
20 alignment with the solicitor's regulatory  
21 obligations.

22 When you worked as an in-house solicitor for  
23 the Post Office between 1986 and 2012, did you  
24 ever believe that you lacked the support and  
25 internal controls that were necessary to

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1 team and ensure that the prosecutions were  
2 properly dealt with in accordance with the  
3 legislation that applied and our prosecution  
4 policy. I was responsible for managing  
5 agents -- because we had agents throughout the  
6 country and counsel throughout the country and  
7 Wales. So I needed to understand how to brief  
8 them and inform them of what was -- we were  
9 doing. I had a team --

10 **Q.** Mr Wilson, sorry to interrupt you. My question  
11 was pitched at a slightly higher level than in  
12 the job that you, in fact, were doing from  
13 mid-'86 onwards what were your responsibilities?  
14 I was asking what was your understanding of the  
15 regulatory obligations, the duties of  
16 an in-house solicitor were at that time?

17 **A.** Well, my duties were to ensure that we properly  
18 prosecuted on behalf of Royal Mail, in  
19 accordance with the legislation and in  
20 accordance with the Code for Crown Prosecutors  
21 when that came out in 1986, so, additionally,  
22 the prosecution policy, that we'd adhered to the  
23 rules and regulations that we'd prescribed for  
24 ourselves in terms of prosecuting offenders.

25 **Q.** Can you please give us your understanding of

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1 maintain your independence?

2 **A.** No, I didn't. I was never under any pressure  
3 from any individual within the Post Office or  
4 indeed any team within the Post Office to do --  
5 take any action that I was not happy with.

6 **Q.** Did you ever feel that your independence was at  
7 risk, where the commercial interests of the Post  
8 Office were not in alignment with the -- your  
9 regulatory obligations?

10 **A.** No, I never felt that at all.

11 **Q.** In this period did you understand that you were  
12 required to comply with the Code of Conduct for  
13 solicitors and the principles issued under it  
14 and with the predecessor equivalents of the Code  
15 and those principles?

16 **A.** Yes, I did.

17 **Q.** Did you understand that at all times that  
18 included a duty to act with independence and  
19 that included to act with independence from your  
20 client?

21 **A.** Yes, I understood that and I never felt under  
22 pressure at any stage during my career to act  
23 other than independently.

24 **Q.** Were there any policies, protocols or guidance  
25 in place during your extensive period in office

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1 that were designed to protect the independence  
 2 of in-house solicitors and in-house counsel in  
 3 your team at the Post Office?  
 4 **A.** No, not that I recall.  
 5 **Q.** Why not?  
 6 **A.** Why not? That's a good question. I never felt  
 7 under any pressure to do anything whilst I was  
 8 a solicitor. I had -- we had contact with the  
 9 Law Society and I don't know why we didn't do it  
 10 but there were no rules or protocols in place,  
 11 that I can recall.  
 12 **Q.** Looking back, do you think that would have been  
 13 a good idea, in particular for maybe lawyers  
 14 less senior in the organisation than you, that  
 15 explained to them the nature of their duties and  
 16 how that was going to be carried into effect on  
 17 the ground in the Post Office?  
 18 **A.** It would have been a good idea but, at the time,  
 19 I never thought it was necessary. I didn't  
 20 think that we were ever -- either myself or my  
 21 team were under any pressure from any department  
 22 within Post Office Limited to take action or not  
 23 to take action if we didn't wholeheartedly agree  
 24 with that course of action.  
 25 **Q.** So in 1986 you moved into the Criminal Law Team

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1 issuing summonses. So there was always a time  
 2 lag so some of the cases that we first  
 3 prosecuted under Horizon must have come in,  
 4 I guess, in 2001/2002.  
 5 **Q.** I was going to ask you how long, following the  
 6 rollout after Horizon, did the Post Office wait  
 7 before it started to prosecute its  
 8 subpostmasters?  
 9 **A.** I don't know the answer to that one. But I know  
 10 that pension allowance order fraud, which was  
 11 the big fraud prior to Horizon, continued until  
 12 2005 and I understand some of those cases must  
 13 have had evidence from the Horizon system.  
 14 **Q.** What, if anything, were the Criminal Law Team  
 15 told about the reliability and accuracy of data  
 16 produced by the Horizon system during the  
 17 national rollout period in 1999/2000?  
 18 **A.** I really can't remember. I imagine we were told  
 19 something but I can't remember. But it must  
 20 have been that the system was viable and  
 21 appropriate.  
 22 **Q.** Can you recall whether enquiries were actively  
 23 made by you and your team of Post Office  
 24 departments in that regard, "We've got a new  
 25 computer system it's producing data, we're

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1 in the Post Office --  
 2 **A.** I did.  
 3 **Q.** -- and I think you stayed there for 26 years --  
 4 **A.** I -- I don't know. Probably.  
 5 **Q.** -- until -- I think 1986 until April 2012 --  
 6 **A.** Yes.  
 7 **Q.** -- is 26 years.  
 8 **A.** Right.  
 9 **Q.** You prosecuted Horizon-based cases, ie cases  
 10 that relied on data produced from the Horizon  
 11 system, from the year 2000 onwards; is that  
 12 right?  
 13 **A.** I think even before that. I think in 1999  
 14 Horizon came in, didn't it?  
 15 **Q.** Well, there was a rollout in 1999 and so some  
 16 sub post offices will, in a staged process, have  
 17 been given the equipment and asked to operate it  
 18 before 2000.  
 19 **A.** Right.  
 20 **Q.** So you recall prosecuting cases in 1999 based on  
 21 Horizon data, do you?  
 22 **A.** Well, there was always a time lag between  
 23 investigating an offence and --  
 24 **Q.** A suspected offence, presumably?  
 25 **A.** -- a suspected offence, and then actually

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1 founding our charges on the basis of this data.  
 2 Can you tell us whether the system is reliable,  
 3 please"?  
 4 **A.** Well, that request would have gone via the  
 5 Investigators to obtain evidence from the  
 6 Fujitsu people who were producing the evidence  
 7 and would have appeared in their individual  
 8 statements.  
 9 **Q.** Right from the start?  
 10 **A.** I imagine so, yes.  
 11 **Q.** You would expect it to be a necessary element of  
 12 an investigation to establish the reliability of  
 13 the data upon which an investigation and then  
 14 potentially a prosecution was founded?  
 15 **A.** Yes, I would.  
 16 **Q.** Why would you think it simply just to be  
 17 an ordinary, necessary part of the  
 18 investigation?  
 19 **A.** Well, because if they couldn't establish that  
 20 the system was working properly, then the  
 21 evidence had no value.  
 22 **Q.** So reliability of the data was a fundamental or  
 23 essential part of any investigation founded upon  
 24 such data?  
 25 **A.** Absolutely.

20

1 Q. To your knowledge, was your team made aware of  
2 the high severity Acceptance Incident known by  
3 number 376, which concerned discrepancies and  
4 lost transactions, in the course of the national  
5 rollout?

6 A. I don't recall that at all.

7 Q. Do you remember something called Acceptance  
8 Incidents?

9 A. No.

10 Q. Do you recall that, as part of the contractual  
11 arrangements between the Post Office and  
12 Fujitsu, there were a series of criteria that  
13 had to be met before, essentially, the system  
14 was permitted to go live across the national  
15 estate --

16 A. No.

17 Q. -- and that incidents -- Acceptance Incidents,  
18 as they were called -- were raised if there were  
19 problems; do you recall that?

20 A. No, I don't recall that at all.

21 Q. And that there were a series of those that  
22 concerned the integrity of the data that Horizon  
23 was producing?

24 A. No, I don't recall.

25 Q. Similarly, would it be right, therefore, that

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1 to you and your team?

2 A. No. My dealings were purely with the  
3 Investigators, the investigation team. I had no  
4 real contact within Post Office Limited  
5 hierarchy above me and nobody of a senior level  
6 ever contacted me and gave me that information.

7 Q. Like sort of a moratorium or a period of grace,  
8 whilst the system was bedding in and  
9 subpostmasters learned how to operate it rather  
10 than moving straight to prosecuting them?

11 A. That may well have been the case and my memory,  
12 again, may be faulty. I just got the impression  
13 that when Horizon came in, that we -- it was  
14 being used and we were obtaining evidence via  
15 the investigators.

16 Q. Did you or members of your Criminal Law Team  
17 meet with any technical staff from Post Office  
18 to understand or gain an understanding of how  
19 Horizon worked?

20 A. We -- I think the answer probably is yes.  
21 I don't recall the meetings but I think the  
22 answer probably would be yes. We, certainly, in  
23 terms of training, offered training to a number  
24 of counsel and agents who were used for  
25 advocacy, and we had a number of training

23

1 you don't recall the team being made aware of  
2 High Severity Acceptance Incident 218, which was  
3 about a series of subpostmasters raising issues  
4 about their ability to operate the system when  
5 it came to balancing their accounts and  
6 unexplained discrepancies appearing in their  
7 accounts when they did the weekly balance?

8 A. No, I wasn't aware of that.

9 Q. The way you explained matters earlier suggested  
10 that you thought that the Post Office started  
11 prosecuting on the basis of Horizon data  
12 relatively soon after Horizon was introduced?

13 A. I thought so, yes.

14 Q. It's been suggested by some senior Post Office  
15 witness evidence given to the Inquiry that the  
16 Post Office would "give the benefit of the  
17 doubt" during and immediately following the  
18 national rollout period because of the natural  
19 difficulties that would be encountered in  
20 introducing and then embedding a new system, and  
21 so that, if discrepancies arose, postmasters  
22 would be given the "benefit of the doubt" and  
23 not prosecuted.

24 Was that something that trickled its way  
25 down from those senior Post Office individuals

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1 sessions throughout the country where the  
2 Horizon system was up and running and could be  
3 used by those people. So I imagine, because  
4 I went on training sessions as well, that some  
5 explanation was given at that time as to what  
6 the Horizon system did.

7 Q. How long did your training on Horizon take?

8 A. Well, I think I attended at least two, maybe  
9 three sessions with counsel and possibly agents  
10 throughout the country. I remember going to  
11 Weston-super-Mare on one and I remember in  
12 London, having a number of counsel who turned up  
13 to one of the training sessions.

14 Q. Did those training sessions involve gaining  
15 an understanding of how data was produced by the  
16 Horizon system and how it could be translated  
17 into evidentially sound material for the use of  
18 an investigation and a prosecution or was it  
19 more about "This is what a keypad does, this is  
20 what the system looks like, this is the  
21 touchscreen", that kind of thing?

22 A. Yes, more the latter explanation that you've  
23 just given that -- not the technical details.

24 Q. Were there any meetings between you and Post  
25 Office technical teams to gain an understanding

24

1 of the potential causes of errors or faults  
 2 within the system that may affect the quality of  
 3 the data that it produces?  
 4 **A.** No.  
 5 **Q.** Were there any meetings between you or, to your  
 6 knowledge, other members of the Criminal Law  
 7 Team with ICL Pathway, later Fujitsu, at this  
 8 early stage to determine what were the available  
 9 records and data streams from Horizon in order  
 10 that Post Office's disclosure obligations could  
 11 be met?  
 12 **A.** No.  
 13 **Q.** Wouldn't that have been necessary when  
 14 a national system was being rolled out,  
 15 involving a new species of evidence across  
 16 19,000-odd branches, that may be used a range of  
 17 prosecution contexts, to understand what are the  
 18 data stores within this system, which of them  
 19 are going to be accessed and which of them are  
 20 not, in order to found a prosecution?  
 21 **A.** I think we got that information via the  
 22 Investigators, no doubt in their reports, and  
 23 via the witness statements from the experts and  
 24 the Fujitsu personnel. So the instructions that  
 25 we got would have come from those two sources,

25

1 way or the other. But I never, looking back  
 2 now, thought that I didn't understand where they  
 3 were getting information from and what type of  
 4 information was being relied on. I don't think  
 5 I ever had a memory that, actually, this all  
 6 needs to be explained to me.  
 7 **Q.** Presumably that process was one of revelation to  
 8 you bit by bit, then?  
 9 **A.** I don't know. I mean, I don't know. It may be  
 10 they produced a document that we read and we  
 11 understood but, as I say, looking back,  
 12 I couldn't swear to it.  
 13 **Q.** In May 2002 you were appointed head of the  
 14 Criminal Law Team?  
 15 **A.** Yes.  
 16 **Q.** Who was your line manager at that time?  
 17 **A.** I think it was Catherine Churchard.  
 18 **Q.** What was her responsibility, what was her job?  
 19 **A.** She was General Counsel.  
 20 **Q.** Did your line manager remain the General Counsel  
 21 for the Post Office?  
 22 **A.** No, it didn't.  
 23 **Q.** Can you explain the changes, please?  
 24 **A.** Yeah, sure. I don't know whether Catherine  
 25 Churchard retired or what happened but, at some

27

1 and we would have understood from the witness  
 2 statements that, for example, ARQ data was being  
 3 accessed or transaction logs, or whatever the  
 4 information was that we were relying on, and  
 5 were being exhibited via the witness statement  
 6 and an explanation from the investigator.  
 7 And I think that, if I had not understood  
 8 something, I would have asked the question.  
 9 **Q.** I'm talking about, rather than an *ad hoc* and  
 10 piecemeal process that developed where perhaps  
 11 a series of emails are exchanged between  
 12 Investigators and individual Fujitsu staff to  
 13 say, "Have you got this? Can Dave go and find  
 14 that? Has Mike got a copy of that", which we've  
 15 seen, a fundamental understanding, right at the  
 16 beginning of the process that "These are the  
 17 data streams, these are the data stores in this  
 18 new computer system. We will expect,  
 19 essentially, at a service level for  
 20 Investigators to find and obtain X material. It  
 21 isn't necessary for them to find or obtain Y  
 22 material".  
 23 **A.** It may well be that we did have a written  
 24 explanation of the system but now, looking back,  
 25 I can't remember. I couldn't swear on oath one

26

1 point, we were told that the team was going to  
 2 be disbanded and made redundant. I know that  
 3 the Security Director at board level argued to  
 4 retain the team and he was successful.  
 5 So, after Catherine Churchard, I believe  
 6 I reported to Andrew Wilson and I reported to  
 7 Andrew Wilson for a number of years, I don't  
 8 know how long, but, at some point, General  
 9 Counsel asked to have the team back and I think  
 10 that was Doug Evans, and I then reported to Doug  
 11 Evans.  
 12 At each stage of the transfers, when I was  
 13 reporting to Andrew Wilson, I had dotted line to  
 14 General Counsel, so I attended team leaders'  
 15 meetings and such like, so I wasn't divorced  
 16 completely from the leadership in the Legal  
 17 teams. And from Doug Evans -- I think he left  
 18 in about 2011, possibly 2012, and there was  
 19 a new General Counsel, who I -- in fact, in the  
 20 middle of it, I may well have reported to Tony  
 21 Marsh for a short period of time when Andrew  
 22 Wilson retired. In fact, I think that's right.  
 23 **Q.** So you reported to the Head of Security?  
 24 **A.** Head of Security, yes. When Andrew Wilson  
 25 retired I reported to Tony Marsh and then -- for

28

1 a short period and then, after that, reported to  
 2 General Counsel Doug Evans, until about 2011.  
 3 **Q.** Did you ever report to the Company Secretary?  
 4 **A.** No.  
 5 **Q.** Do you remember Jonathan Evans as a name?  
 6 **A.** I do know him but I never reported to him.  
 7 **Q.** Who, over the period between the year 2000 and  
 8 the year 2012, was responsible at board level  
 9 for oversight of criminal prosecutions and  
 10 confiscation proceedings?  
 11 **A.** Probably Jonathan Evans but I couldn't swear to  
 12 that.  
 13 **Q.** Why would Jonathan Evans in that period have  
 14 responsibility, by way of oversight, for the  
 15 conduct of criminal proceedings in any  
 16 confiscation?  
 17 **A.** Because I believe the Security Director, who  
 18 I reported to, reported to a board member and,  
 19 if I remember rightly, it was Jonathan Evans.  
 20 **Q.** So the Head of Security reported to the Company  
 21 Secretary?  
 22 **A.** As far as I can recall, yes.  
 23 **Q.** You've told us that it was only for a short  
 24 period of time that you reported to Tony Marsh.  
 25 **A.** I think so, yes.

29

1 **Q.** Was there any regular reporting by the Criminal  
 2 Law Team to the board on its prosecutorial  
 3 activities?  
 4 **A.** No. Not that -- no, no there wasn't. Reports  
 5 for cases that were concluded went to General  
 6 Counsel and the Security Director, and possibly  
 7 somebody else, but I don't think they even went  
 8 to board level.  
 9 **Q.** When you say reports on concluded cases, do  
 10 I understand you to mean "We've prosecuted Mr X  
 11 or Mrs Y, that went to Z Crown Court, there was  
 12 a guilty plea or a trial, it resulted in  
 13 a finding, usually of guilt, and there were  
 14 these confiscations proceedings, £20,000  
 15 recovered", something like that?  
 16 **A.** Yeah, basically, yes, and I prepared, at the end  
 17 of the month, a list of number of new cases,  
 18 cases concluded, which teams they related to,  
 19 because there were other teams within POL --  
 20 other than POL, there was Royal Mail,  
 21 Parcelforce. So I gave, at the end of the  
 22 month, a fuller description of what had happened  
 23 in that month, so people could get a picture of  
 24 what was going on in the team, apart from, as  
 25 you've just been talking about, the individual

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1 **Q.** What about other periods of time, then? Who did  
 2 your report report in to at board level?  
 3 **A.** Um ...  
 4 **Q.** I'm looking for the identity across this 12-year  
 5 period, so when Horizon really nationally rolled  
 6 out until when you left in 2012 --  
 7 **A.** Yeah.  
 8 **Q.** -- who in the board would you say had  
 9 responsibility for the Post Office's conduct of  
 10 criminal proceedings?  
 11 **A.** I think Jonathan Evans did initially and, after  
 12 that, I don't know. If you could give me some  
 13 names, I could probably --  
 14 **Q.** Well, over that 12-year period, there is a large  
 15 number of names with frequent changes.  
 16 **A.** I never had any dealings with anybody at board  
 17 level.  
 18 **Q.** So that was going to be my next question. To  
 19 what extent did you have access to the board?  
 20 **A.** No, I never had access to the board. I never  
 21 had any dealings. Well, I say I never had any  
 22 dealings. I may have got the odd telephone call  
 23 from somebody now and again, wanting a general  
 24 answer to a criminal question or something of  
 25 that nature, but nothing significant.

30

1 reports of concluded cases.  
 2 **Q.** Was that more from a personnel management  
 3 perspective?  
 4 **A.** Yes, probably, yes.  
 5 **Q.** Appreciating that you didn't attend board  
 6 meetings and, as you said, didn't have access to  
 7 the board, what was your understanding of how  
 8 it, the board, exercised oversight of the Post  
 9 Office's prosecutorial function?  
 10 **A.** Via the Security Director. I understand that  
 11 the Security Director will have gone to board  
 12 meetings now and again, possibly not every board  
 13 meeting, but I certainly recall Andrew Wilson  
 14 telling me information that had happened at  
 15 a board level meeting. I can't recall what it  
 16 was now but I do recall him going to board  
 17 meetings now and again.  
 18 **Q.** The Head of Security, Mr Marsh or Mr Scott,  
 19 reported to the Security Director?  
 20 **A.** I don't know about Mr Scott. I had very, very  
 21 few dealings with Mr Scott. The Security  
 22 Directors I dealt with and I recall were Andrew  
 23 Wilson and Tony Marsh.  
 24 **Q.** You're referring to them as Security Director?  
 25 **A.** Mm-hm.

32



1 Q. By that title, do you mean Head of Security?  
 2 A. Yes, Head of Security.  
 3 Q. Rather than a director of the company?  
 4 A. Oh, yeah -- no -- yes, head of Security.  
 5 Q. Was it your understanding that that position,  
 6 Head of Security, attended board meetings?  
 7 A. I think they did occasionally. I don't think  
 8 they did every board meeting, no, but I think  
 9 I do remember Andrew Wilson coming back from  
 10 board meetings and telling me something that was  
 11 pertinent at the time.  
 12 Q. Would I be wrong to take from your evidence that  
 13 there was, from your perspective, modest  
 14 intrusive oversight of the Post Office's  
 15 prosecutorial function by the board?  
 16 A. Yes, it was modest.  
 17 Q. It would be modest?  
 18 A. I think so. I think we weren't causing  
 19 difficulties. I know we're here because of  
 20 difficulties. We weren't causing difficulties  
 21 in terms of any criticism from any outside  
 22 authority. We were doing the job. The vast  
 23 majority of the cases -- individuals, pleaded  
 24 guilty and I don't think that our heads went  
 25 over the parapet, effectively.

33

1 A. Yes.  
 2 Q. So the Investigators -- and you're talking about  
 3 here the Investigators within the Security team,  
 4 is that right --  
 5 A. I am, yes.  
 6 Q. -- were historically and usually counter staff,  
 7 ie counter clerks or the like?  
 8 A. They weren't always. Occasionally we did  
 9 recruit police officers and I think we did  
 10 recruit people from outside Post Office Limited,  
 11 so it wasn't exclusively people who had had  
 12 audit functions or whatever within Post Office  
 13 Limited.  
 14 Q. But the majority -- you use the word here  
 15 "often" -- were counter clerks or ex-counter  
 16 clerks?  
 17 A. A lot of them were, yes.  
 18 Q. They were people who had no investigative or  
 19 prosecutorial experience?  
 20 A. No.  
 21 Q. What role, if any, did the Criminal Law Team  
 22 play in the training of these former counter  
 23 clerks?  
 24 A. We did have a role. We've, as part of their  
 25 training, we arranged mock trials. I can

35

1 Q. So the board were just letting you get on with  
 2 it; is that the feeling we should come away  
 3 with?  
 4 A. I think so, yes.  
 5 Q. Moving on, you tell us in your witness statement  
 6 at paragraph 6 -- I wonder whether we can turn  
 7 that up please, it's page 4. Can you see  
 8 paragraph 6 and you're dealing here with the  
 9 more general rationale behind the practice of  
 10 bringing private prosecutions?  
 11 A. Yes.  
 12 Q. If we go over the page, please, to page 7 --  
 13 sorry, to page 5. In the second line, second  
 14 sentence, you say:  
 15 "Investigators were often recruited from  
 16 counter staff because of their familiarity with  
 17 accounting documents and procedures. It was  
 18 felt that such in-house knowledge of accounting  
 19 systems, practices and procedures was difficult  
 20 to acquire overnight by police officers who had  
 21 no knowledge of the workings of [the Post  
 22 Office]. It was therefore not felt appropriate  
 23 to pass the investigation of crime within [the  
 24 Post Office] to the police."  
 25 Yes?

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1 remember addressing new recruits on various  
 2 different topics and we would support the  
 3 training wing, if and when needed.  
 4 Q. Was it needed?  
 5 A. Yeah, I think that -- I was involved in a number  
 6 of training packages, yes.  
 7 Q. What were the topics for which the Criminal Law  
 8 Team offered assistance in the training of the  
 9 former counter clerks who were now the  
 10 Investigators?  
 11 A. I believe disclosure was a big training pack --  
 12 package.  
 13 Q. So the Investigators were trained in their  
 14 disclosure duties; is that right?  
 15 A. The Policy and Standards Team, as I can recall,  
 16 prepared some of the training packages for new  
 17 Investigators and, from time to time, I would  
 18 have had an input but we had a specific training  
 19 wing who had a continually rolling function of  
 20 training, not just the new Investigators, but  
 21 the existing Investigators, throughout the  
 22 years.  
 23 So -- and they also produced the -- the  
 24 training wing also produced, almost on a weekly  
 25 basis, any amendments to any legislation or

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1 procedures that were -- that had been decided.  
 2 So it wasn't just "Here's your training", it was  
 3 a continual process. And we had what I would  
 4 call the intranet, where all of the training  
 5 packages and the processes and procedures and  
 6 the policy documents were stored, so that the  
 7 investigators could historically look back and  
 8 see what was going on. But they weren't just  
 9 left to their own devices. As I say, there was  
 10 a continual process of updating their knowledge.

11 And I remember going on, for example,  
 12 a training package throughout the country on the  
 13 preparation of committal papers because I think  
 14 we were having difficulties, or we'd identified  
 15 some problems or some gaps, and so we put  
 16 together a training package for that.

17 **Q.** So, from your perspective, would you say overall  
 18 that the training afforded to Investigators, in  
 19 relation to their duties under the law, was  
 20 adequate?

21 **A.** Well, hopefully more than adequate.

22 **Q.** What epithet would you use to describe it?

23 **A.** Well, I would like to think that it was  
 24 professional.

25 **Q.** So no Investigator could point towards the

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1 document and I imagine that most of the  
 2 information that would have been pertinent for  
 3 the investigators was in -- was in a document  
 4 with the heading, you know, "Processes and  
 5 Procedures".

6 **Q.** If you had any concerns about gaps in  
 7 investigations or flaws in process, for example  
 8 a reasonable line of inquiry was not being  
 9 pursued, what would you do?

10 **A.** Well, I'd contact the Investigator directly.

11 **Q.** Would that be it?

12 **A.** Well, not necessarily. It depends on what the  
 13 problem would be. So, for example, what I was  
 14 referring to earlier, the committals, I remember  
 15 putting together a package on committals because  
 16 we were getting statements and exhibits that  
 17 were all over the place and were not dealt with  
 18 appropriately, and so we put together a package  
 19 so, if I'd identified a problem and it was  
 20 something that I thought was either serious or  
 21 persistent, then I would contact one of the  
 22 Investigators in the -- not necessarily the  
 23 training wing but the wing that dealt with  
 24 processes and procedures, and we would get our  
 25 heads together and we'd sort the issue out.

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1 training and say, "Well, I didn't know that the  
 2 law required me to do that because I wasn't  
 3 properly trained"?

4 **A.** He shouldn't be able to, no.

5 **Q.** Would you agree that, if Investigators were  
 6 mainly drawn from a Post Office counter clerk  
 7 background and, therefore, they had no prior  
 8 expertise in criminal investigation and criminal  
 9 prosecutions, it was important that the Post  
 10 Office's policies that regulated their  
 11 activities were clear and precise as to the  
 12 roles and duties and the obligations that they  
 13 owed?

14 **A.** I think the roles and duties that they had were  
 15 probably not in the prosecution policies. They  
 16 were in the processes and procedures manual that  
 17 the training wing will have put together.

18 **Q.** So there was a high-level policy, there was  
 19 a process and procedure document --

20 **A.** Yes.

21 **Q.** -- and then there was some training that trained  
 22 on that process and procedure document; is that  
 23 right?

24 **A.** Yeah, I mean that's basically how it went. The  
 25 prosecution policy was a very high level

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1 **Q.** So, to your understanding, between this period  
 2 of 2000 to 2012, all Investigators ought to have  
 3 understood their duty of candour when applying  
 4 for a summons to institute a prosecution?

5 **A.** They should have done, yes.

6 **Q.** They ought to have understood their duty to  
 7 pursue all reasonable lines of inquiry?

8 **A.** Yes, it would be implicit in what they're doing  
 9 that they should be understanding that, yes.

10 **Q.** I'm asking whether it was explicit, that they  
 11 were trained that there was a duty under the law  
 12 to pursue lines of investigation that pointed  
 13 away from the guilt of the suspect as well as  
 14 towards it?

15 **A.** That would have been included in a training  
 16 package.

17 **Q.** They would have all understood that it was part  
 18 of their duty to establish the reliability of  
 19 the evidence, including the data upon which they  
 20 were founding a case against the suspect?

21 **A.** Again, that would be in a training package and  
 22 they should have understood that, yes.

23 **Q.** What steps were in place to monitor the  
 24 professional performance of Investigators  
 25 against the standards required by the law?

40

1 A. Sorry, can you repeat that?  
 2 Q. Yes. What steps were in place to monitor the  
 3 professional performance of Investigators  
 4 against the standards required by the law?  
 5 A. Well, I think that if there had been a failing,  
 6 then that issue would have been raised both to  
 7 myself and the Head of Investigations and,  
 8 depending what the failure was, it would either  
 9 have been addressed individually or as a group  
 10 issue, where we would have put out  
 11 communications to address any problem.  
 12 Q. So it was only if failings were identified that  
 13 something would be done? I'm talking about  
 14 something more systemic and fundamental  
 15 monitoring the performance of people, in the  
 16 conduct of their investigations and  
 17 prosecutorial activities, to ensure that it's  
 18 not until something goes wrong that the balloon  
 19 goes up?  
 20 A. Yeah, there was a Casework Management Team where  
 21 the files from the Investigators were forwarded  
 22 to the Casework Management Team, who then  
 23 forwarded them to my team or to me and, part of  
 24 the case work management team function was to  
 25 check that the investigators had done what

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1 Q. Under whose supervision did they operate?  
 2 A. I don't know who was the head of the team.  
 3 I can't remember.  
 4 Q. Were they part of the Security Department?  
 5 A. Well, I believe that most of them -- but I may  
 6 be wrong about this -- most of them were  
 7 ex-Investigators or they'd been Investigators  
 8 and they had been moved into the Casework  
 9 Management Team. Now, that might not be 100 per  
 10 cent right, some of them not have been but  
 11 I think that, at least -- I don't know.  
 12 I can't, actually -- I'd be making it up.  
 13 Q. Were there any lawyers within that team?  
 14 A. No.  
 15 Q. You got the files after they had passed through  
 16 the Casework Management Team?  
 17 A. Yes.  
 18 Q. The three issues that I mentioned -- knowledge  
 19 of the duty of candour, knowledge of the duty to  
 20 pursue all reasonable lines of inquiry and  
 21 knowledge of the duty to obtain evidence that  
 22 established the reliability of the data upon  
 23 which a prosecution or investigation was  
 24 founded -- were they the kinds of things that  
 25 the Casework Management Team were checking

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1 they're supposed to have done.  
 2 I think there was a big checklist which  
 3 needed to be ticked and I think that, in the  
 4 event that they hadn't complied with what the  
 5 processes and procedures were, then the file  
 6 would necessarily be returned to the  
 7 Investigator to address the issue.  
 8 So I think this middle function was the  
 9 Casework Management Team and I guess that, if  
 10 there'd been a massive failure or something that  
 11 was pretty serious, then it would have been  
 12 flagged up to the Head of Investigations and  
 13 possibly myself.  
 14 Q. So this massive checklist, and we might look at  
 15 this after the break, was operated by the  
 16 Casework Management Team who performed a sort of  
 17 quality control function?  
 18 A. Yeah, that's how I recall it, yeah.  
 19 Q. How many people were in the Casework Management  
 20 Team?  
 21 A. I don't know. I mean, I think I recall going to  
 22 Leeds, which I believe is where it sort of ended  
 23 up, at least two or three times, and I think  
 24 there were about, if I can remember rightly,  
 25 probably about six to ten people in it.

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1 compliance with?  
 2 A. I imagine so.  
 3 MR BEER: Sir, I wonder whether we can take an early  
 4 break because, in the light of the answers  
 5 given, I want to show some documents that  
 6 I don't think I'm going to be able to right now.  
 7 So if we took the break early now and came back  
 8 at 11.20?  
 9 SIR WYN WILLIAMS: That's fine, then, Mr Beer, yeah.  
 10 MR BEER: Thank you.  
 11 SIR WYN WILLIAMS: 11.20.  
 12 MR BEER: Thank you.  
 13 (11.03 am)  
 14 (A short break)  
 15 (11.20 am)  
 16 MR BEER: Sir, good morning. Can you continue to  
 17 see and hear me?  
 18 SIR WYN WILLIAMS: Yes, thank you.  
 19 MR BEER: Thank you very much.  
 20 Mr Wilson, can we look, please, at  
 21 POL00119917. You mentioned before the break  
 22 a system operated by the Case Management Team,  
 23 which involved checking against standards the  
 24 files that were submitted to them before they  
 25 went on to the Criminal Law Team, and you

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1 mentioned a big long list, I think, or words to  
 2 that effect.  
 3 **A.** That was my recollection, yes.  
 4 **Q.** If you just take your time, just to look at  
 5 this, does that look like the big long list that  
 6 you were speaking about?  
 7 **A.** Probably, yes.  
 8 **Q.** This is an example. We've got lots of these  
 9 where, against the set of criteria, a file is  
 10 marked, and in the right-hand column a score is  
 11 given, which if we scroll down, we can see  
 12 potentially adds up to 100. This Investigator  
 13 got 94 out of 100 for their file.  
 14 **A.** Yes.  
 15 **Q.** You see that it says, "Compliance check  
 16 undertaken by" and it says, "Paul Southin" about  
 17 five lines from the top in the last line in  
 18 blue?  
 19 **A.** Yes.  
 20 **Q.** Would that be somebody in this Case Management  
 21 Team?  
 22 **A.** No, I think -- oh, hang about. Yes, it must  
 23 have been. I think I recall Paul Southin being  
 24 an Investigator but he may well have been in the  
 25 Compliance team as well --  
 45

1 interview"?  
 2 So adequacy of interview does suggest some  
 3 something more than administrative, doesn't it?  
 4 **A.** Yes.  
 5 **Q.** A qualitative assessment of the adequacy or  
 6 inadequacy of a piece of investigative work?  
 7 **A.** Yes.  
 8 **Q.** Would that be your understanding that this Case  
 9 Management Team looked at qualitative issues, as  
 10 well, rather than the more perfunctory issues  
 11 like font size?  
 12 **A.** Yes.  
 13 **Q.** Then if we go down, please, to "Post interview  
 14 details", can you see, at -- I think it's 19,  
 15 "Assessment of evidence available to support  
 16 charges"?  
 17 **A.** Yes.  
 18 **Q.** Can you see that?  
 19 **A.** Yes.  
 20 **Q.** Then two on, "Reliability of witness reported",  
 21 so seemingly a check over whether the file, the  
 22 report, contained an assessment of the evidence  
 23 available to support the charges, and the  
 24 reliability of any witness, yes?  
 25 **A.** Yes.  
 47

1 **Q.** I see.  
 2 **A.** -- later on.  
 3 **Q.** I see. As you said before the break, there may  
 4 be former Investigators who have moved on to the  
 5 Case Management Team?  
 6 **A.** Yeah, that's my recollection, that some of them  
 7 will have been Investigators and I'm pretty  
 8 sure -- well, I don't know. But I think  
 9 probably more had been Investigators than  
 10 weren't, if I can put it that way.  
 11 **Q.** Okay. If we look at this, if we just go back  
 12 up, please, we can see that some of the  
 13 criteria, against which compliance was judged,  
 14 are administrative in nature, can you see (1),  
 15 the right label was used?  
 16 **A.** Yes.  
 17 **Q.** Yes? Number 4, the correct font, namely, it had  
 18 to be Chevin Light 12, was used?  
 19 **A.** Yes.  
 20 **Q.** Yes? If you look at number 7, the file was  
 21 submitted within 12 working days, yes?  
 22 **A.** Yes.  
 23 **Q.** If you look at, under "Offender ... details", at  
 24 number 13, "Details of suspect interview and  
 25 searches as applicable"; "Adequacy of  
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1 **Q.** For those things, can we look, please, at what  
 2 might be an associated policy document, keeping  
 3 those two things in mind, and look at  
 4 POL00118101. You'll see this is a Compliance  
 5 document or "Guide to the Preparation and Layout  
 6 of Red Label Case Files" for the Security and  
 7 Operations Team?  
 8 **A.** Yes.  
 9 **Q.** Can we go forwards, please, to page 7 and look  
 10 at the foot of the page, please. Thank you.  
 11 Essentially, these headings in bold, for the  
 12 most part, match the criteria that we've seen in  
 13 the spreadsheet that we just looked at; do you  
 14 understand?  
 15 **A.** Yes.  
 16 **Q.** So the one that we're looking at, at the moment,  
 17 was the heading against 19, at the bottom of the  
 18 page, which is paragraph 1.15, "Assessment of  
 19 evidence available to support charges". Then  
 20 over the page:  
 21 "This should contain the investigator's  
 22 assessment of the evidence available to support  
 23 the [charges] detailed in the preamble to the  
 24 report it should identify conflict interesting  
 25 evidence statements or admissions and include  
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1 comment on [the] demeanour of [the] offender,  
2 an assessment of their response to questioning,  
3 whether [the] full scope of [the] offence has  
4 been admitted to and suggested reason as to why  
5 [the] crime [was] committed (ie greed [or]  
6 gambling)."

7 I've added a few words in there so that it  
8 makes sense in English.

9 Was it your understanding, therefore, that  
10 the case file and, in particular, the report  
11 within it had to contain the assessment that is  
12 set out there?

13 **A.** Yes, I think so, yes.

14 **Q.** Therefore, when we read, in the case compliance  
15 matrix, assessment of evidence available to  
16 support the charges, this is essentially what  
17 it's being judged against?

18 **A.** Yeah, I believe so, yes.

19 **Q.** Then if we scroll down to 1.17, which is again  
20 the heading -- I've skipped over "Details of  
21 domestic and financial details of offender/s" --  
22 "Reliability of witnesses":

23 "This should contain the investigator's  
24 assessment as to reliability of any relevant  
25 witness or witness statement in the case."

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1 **A.** Yeah, I don't know. I don't know whether Post  
2 Office Limited went into that detail. I can't  
3 recall.

4 **Q.** Okay, in the case files that we've seen, they  
5 don't.

6 **A.** Right.

7 **Q.** Do you accept that, in a case that's based  
8 substantially on evidence produced by  
9 a computer, there needed to be an assessment in  
10 the file which said, "Our data in this case is  
11 obtained from this computer. These are the  
12 security controls around that computer, which  
13 ensure that it has, as a matter of physical  
14 integrity, security. These are the controls  
15 that are in place that ensure the information  
16 security within the computer. These are, if  
17 necessary, the continuity documents that  
18 establish the production of the data. We have,  
19 on enquiry, found that the system suffers from  
20 some bugs, errors and defects. However, the  
21 evidence is either that they didn't cause  
22 discrepancies or they didn't cause material  
23 discrepancies in this case"; that kind of  
24 assessment was necessary?

25 **A.** Yes.

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1 Again, that matches the heading in the  
2 compliance matrix that we just looked at?

3 **A.** Yes.

4 **Q.** So far as you can recall, in Horizon cases, did  
5 such case files and, in particular, the offender  
6 reports within them contain assessments as to  
7 the reliability of the data on which the  
8 proposed prosecution was to be founded?

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

10 **Q.** Would you accept that they should have done,  
11 that, if it wasn't a witness-based case, it was  
12 essentially a data-based case?

13 **A.** Yes.

14 **Q.** An assessment should have been made in the file  
15 as to the reliability of the data on which the  
16 proposed prosecution was founded?

17 **A.** Yeah, yes. I think there was a general  
18 assumption that the data was sound.

19 **Q.** Do assumptions wash in the criminal courts?

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

21 **Q.** No. What washes in the criminal courts?

22 **A.** Well, it has to be certain.

23 **Q.** It has to be evidence?

24 **A.** Yeah.

25 **Q.** It has to be evidence based, doesn't it?

50

1 **Q.** Thank you, that can come down. Can we turn,  
2 please, to Post Office Prosecution Policies and  
3 look, please, at POL00030659.

4 If we just flip to the end of it, please,  
5 which is page 4, and scroll down, we can see  
6 this is dated December 1997 and produced by  
7 Andrew Wilson.

8 **A.** Yes.

9 **Q.** What would have been his function at that time?

10 **A.** He would be the Security Director.

11 **Q.** Back to the first page, please. You've looked  
12 at this policy, because it was disclosed to you  
13 way back when you wrote your witness statement,  
14 and you address it in your witness statement.

15 **A.** Yes.

16 **Q.** You will see that it says that it proposes  
17 a rationale for prosecution policy, and I'm not  
18 going to take you through it in detail but,  
19 essentially, it reads like a discussion paper  
20 about whether or not the prosecutorial function  
21 should be retained by the Post Office or not,  
22 yes?

23 **A.** Yes.

24 **Q.** Up until this point, 1997, was there  
25 a prosecution policy or, to your knowledge, was

52

1 this the first?

2 **A.** I think this was the first.

3 **Q.** If we look at the foot of page 1, under "The  
4 Case for Prosecution", thank you:  
5 "The Post Offices prosecution policy appears  
6 to have evolved after a considerable period with  
7 little formal evaluation or review."  
8 Would you agree with that sentiment?

9 **A.** Yes, that's probably right, yes.

10 **Q.** Mr Wilson identifies that the principles  
11 underlying prosecution were deterrents and  
12 serving the public interest. Then there's  
13 a theoretical discussion of each of those, at  
14 the foot of the page and then over the page.  
15 Then he discusses the "Case Against  
16 Prosecution" and identifies three factors  
17 pointing away from the desirability of the Post  
18 Office conducting its prosecutions: costs,  
19 adverse publicity and industrial relations  
20 consequences, and then there's a discussion of  
21 each of those, which I'm not going to address.  
22 Then if we go to the foot of the page,  
23 paragraph 5, "Proposed Rationale for  
24 Prosecution", and he says:  
25 "Work which has already been carried out  
53

1 prosecute those of its employees or agents who  
2 commit acts of dishonesty against the Post  
3 Office for the purpose of illegally acquiring  
4 Post Office property or assets, or the property  
5 or assets of Post Office customers and clients  
6 while in Post Office custody, where this is  
7 deemed to serve the public interest. Other  
8 wrongdoings will normally be dealt with via the  
9 discipline code."  
10 Was that the prosecution policy until we see  
11 the next policy issued in 2010?

12 **A.** No, I don't think so. There was -- from my  
13 recollection, there was a prosecution policy in  
14 2007.

15 **Q.** Was it, therefore, the prosecution policy until  
16 2007?

17 **A.** I don't know. I would imagine that there would  
18 have been a policy in between there at some  
19 point. I know that the policies were reviewed  
20 every year or they were referred to as being  
21 reviewed every year in the later policies.

22 **Q.** That's a bit of a distinction, isn't it, that  
23 a document says that they were to be reviewed  
24 and whether they were in fact reviewed?

25 **A.** No, I think that -- I think they will have been  
55

1 into the profiling of internal offenders within  
2 the Royal Mail enables a rationale for  
3 prosecution to be constructed which can inform  
4 policy development. In broad terms, offenders  
5 can be placed into one of three categories ...  
6 "Criminal  
7 "Irresponsible [or]  
8 "Irrational."  
9 Then he addresses each of the three of them  
10 by use of his italics; can you see that?

11 **A.** Yes.

12 **Q.** He says:  
13 "The *criminal* category is involved in theft  
14 of mail for personal gain ...  
15 "The *irresponsible* category is usually  
16 involved in wilful delay and/or destruction of  
17 mail ...  
18 "The *irrational* category are a minority and  
19 are characterised by longer service and crimes  
20 which are frequently easily detected (eg opening  
21 [the] mail ... and leaving ... debris."  
22 Then at the foot of the page, he says:  
23 "From the above, it is possible to formulate  
24 a prosecution policy as follows:  
25 "The [prosecution] policy is normally to  
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1 reviewed because there may have been changes in  
2 legislation which would require them to be  
3 changed, but I don't think they were necessarily  
4 amended if there was no need to amend them.  
5 So I think on a yearly, annual basis, the --  
6 I forget which team it was now. I think it was  
7 one of the process teams -- I've forgotten the  
8 name of it now -- would review them on an annual  
9 basis but not necessarily, as I say, change  
10 them.

11 **Q.** Let's assume that this did remain the  
12 prosecution policy --

13 **A.** Right.

14 **Q.** -- between 1997 and 2007.

15 **A.** Right.

16 **Q.** Do you see anything wrong -- if we just scroll  
17 up so we can see the entire statement of the  
18 policy. It's just the bit in italics. Thank  
19 you.

20 **A.** This is "The Post Office's policy is normally to  
21 prosecute those of its employees"?

22 **Q.** Yes.

23 **A.** I think that's the Security Director giving his  
24 opinion of the position at that time in 1997.  
25 I think the policy will have changed when the  
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1 Code for Crown Prosecutors came out and we  
 2 followed --  
 3 **Q.** That was a decade earlier, though, in 1986.  
 4 **A.** Right. So -- yes, of course you're right.  
 5 Well, I think the later policies were more  
 6 specific in terms of referring to the Code for  
 7 Crown Prosecutors and the requirement that was  
 8 specified in there. For -- no, sorry, I'm  
 9 getting myself confused here.  
 10 **Q.** Well, is the problem with that statement that it  
 11 doesn't say "We'll prosecute if there's  
 12 sufficient evidence to do so"?  
 13 **A.** Yeah, I mean it doesn't say that. But I think  
 14 the later policies will have said --  
 15 **Q.** I'm just looking at the moment of what may be in  
 16 operation for a 10-year period, ie this  
 17 document.  
 18 **A.** Yeah, I don't think that would have been in  
 19 operation for 10 years though. I think there  
 20 will have been other policies that possibly have  
 21 not been identified.  
 22 **Q.** Okay, then. For however long this operated,  
 23 would you agree that it's problematic, in that  
 24 it appears to assume that somebody is guilty and  
 25 doesn't include any evidential test?

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1 **Q.** "Investigators will ultimately report to the  
 2 Director of Security with regard to the conduct  
 3 of criminal investigations."  
 4 Do you see anything difficult or problematic  
 5 with that first sentence?  
 6 **A.** The priorities of the business.  
 7 **Q.** What's difficult or problematic with that?  
 8 **A.** Well, they should be independent.  
 9 **Q.** Can we go forward to 3.2.9, please, on page 3:  
 10 "Suspect offenders will be prosecuted where  
 11 there is sufficient evidence ..."  
 12 I think this is what you were referring to  
 13 earlier, that later policies included  
 14 a cross-reference to the sufficiency of  
 15 evidence:  
 16 "... and it is in the public interest in  
 17 accordance with the Code for Crown Prosecutors."  
 18 In your view, was it sufficient to include  
 19 a cross-reference to the Code in this way,  
 20 rather than explaining the way in which the Code  
 21 operated and was to be carried into effect in  
 22 the context of a private prosecutor and, in  
 23 particular, where that private prosecutor was  
 24 the Post Office?  
 25 **A.** I think the Code for Crown Prosecutors would

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1 **A.** Yes.  
 2 **Q.** It contains no reference to the Code for Crown  
 3 Prosecutors that had been in place for a decade  
 4 by this time?  
 5 **A.** Yes.  
 6 **Q.** Thank you. Can we move forward to the 2007  
 7 policy that you mentioned, POL00030578. Thank  
 8 you. If we look just at the foot of the page,  
 9 it's at the foot of every page, we can see it is  
 10 dated 1 December 2007, yes?  
 11 **A.** Yes.  
 12 **Q.** If we go to the last page, which is page 5, we  
 13 can see the owner of the policy is set out and  
 14 those who gave assurance to the policy set  
 15 out --  
 16 **A.** Yes.  
 17 **Q.** -- which included you?  
 18 **A.** Yes.  
 19 **Q.** If we go back to page 1, please, and scroll down  
 20 to 3.1.4. Can you see that reads:  
 21 "The conduct, course and progress of  
 22 an investigation will be a matter for the  
 23 investigators as long as it is within the law,  
 24 rules and priorities of the business."  
 25 **A.** Yes.

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1 have been more fully explained in the training  
 2 information that was passed to Investigators and  
 3 new Investigators. And the Code itself will  
 4 have -- certainly in my team, every lawyer had  
 5 a copy of the Code, all of the decision makers  
 6 had a copy of the Code and, rather than break it  
 7 down in what I would say would be a high-level  
 8 document, in this document, the Code itself  
 9 stood on its own but also will have been more  
 10 fully explained in the training information, is  
 11 my recollection.  
 12 **Q.** Was it recognised that special issues may arise  
 13 in the case of an organisation that was the  
 14 alleged victim of an offence, a possible witness  
 15 to the offence, where that organisation had  
 16 investigated the offence, would then decide  
 17 whether to prosecute the offence and, if so, go  
 18 ahead and prosecute the offence?  
 19 **A.** I think we tried to divorce the decision to  
 20 prosecute from the investigation function and my  
 21 function by putting it into the business for  
 22 a more objective look at the decision.  
 23 I think that, prior to 1997, the decision to  
 24 prosecute was made by a senior investigator  
 25 within the investigation part of the business

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1 and, subsequently, in 2012, it reverted back to  
 2 the Investigator and I think that was because it  
 3 was imagined that, with the separation of Post  
 4 Office and Royal Mail, that, in order to obtain  
 5 consistency because people were changing their  
 6 jobs within POL and people were moving, people  
 7 were leaving, that it went back to the  
 8 Investigator.

9 But that was purely for consistency and,  
 10 within that period, the role swapped between,  
 11 I think, the Head of Human Resources or  
 12 nominated individuals within the business.

13 **Q.** We're going to come in a minute to look at that  
 14 decision-making responsibility?

15 **A.** Right, yeah.

16 **Q.** But are you saying that, essentially, in  
 17 summary, that the way the Post Office addressed  
 18 the fact that it was victim, witness,  
 19 investigator, decision maker and prosecutor, all  
 20 in one, was to get the lawyers to make decisions  
 21 on prosecutions?

22 **A.** So far as the evidence was concerned, yes.

23 **Q.** And to get somebody who wasn't involved in the  
 24 investigation to make the decision on public  
 25 interest?

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1 **A.** Well, I don't -- yeah, I don't think that the  
 2 priority of the business I would have trained  
 3 them on at all. As far as I was concerned, the  
 4 decision had to be an independent decision.

5 **Q.** Can we turn forward to 2010, please, and look at  
 6 POL00030580.

7 If we look, please, at the bottom right-hand  
 8 corner of page 1, we'll see that it's dated  
 9 4 April 2010; can you see that?

10 **A.** Yes.

11 **Q.** If we just scroll up, please, the owner is said  
 12 to be Head of Security, who at that time was  
 13 Mr Scott?

14 **A.** Yes.

15 **Q.** What did it mean to be the "owner" of a policy?

16 **A.** Well, he will have been responsible for ensuring  
 17 that his Investigators adhered to the policy and  
 18 would have been responsible for checking that it  
 19 was accurate in terms of -- if it was dealing  
 20 with legislation.

21 **Q.** If we scroll down, please, and look at  
 22 "Assurance" and "Authorised", on "Assurance"  
 23 what would you understand it to mean if a person  
 24 had given assurance for a policy?

25 **A.** That they would have read the policy, be happy

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1 **A.** Yes.

2 **Q.** What this does is it says decisions will be made  
 3 in accordance with the Code for Crown  
 4 Prosecutors and everyone had a copy of it?

5 **A.** Yes.

6 **Q.** Everyone relevant had a copy of it?

7 **A.** Yes.

8 **Q.** Was there anything which sat between those two  
 9 poles, "We're going to apply the Code", "Here's  
 10 a copy of the Code", which explained the  
 11 particular difficulties that may arise in  
 12 an organisation that would be investigating and  
 13 prosecuting theft from itself.

14 **A.** I don't think that that specifically will have  
 15 been addressed but we did address training for  
 16 the decision makers. Myself and the Head of  
 17 Investigations did provide training to those  
 18 people who were making the decision and I was  
 19 the contact point for anyone who was a decision  
 20 maker, if they had an issue or a problem or  
 21 wanted to discuss anything.

22 **Q.** What would you train them as to the  
 23 permissibility or impermissibility of taking  
 24 into account the "priorities of the business" in  
 25 such decision making?

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1 with the policy, happy that it addressed any  
 2 issues, and that was not inaccurate and have  
 3 checked that it complied with any legislation  
 4 that was appropriate.

5 **Q.** Again, what would you understand it to mean if  
 6 somebody is shown as having authorised the  
 7 policy?

8 **A.** Well, effectively, I think I would have thought  
 9 that that was that they'd written the policy and  
 10 certainly were -- having written the policy or  
 11 got somebody to write it, that they were  
 12 responsible for it.

13 **Q.** You see in the right-hand column there it's got  
 14 a date for both of those things to happen, ought  
 15 they to be completed against "Assurance" and  
 16 "Authorised", right-hand side, date?

17 **A.** Yeah, meaning 4 April 2010?

18 **Q.** No, do you see under the words "Assurance" and  
 19 "Authorised"?

20 **A.** Oh, right, yes.

21 **Q.** Yesterday Mr Scott told us that this means  
 22 nothing because the date hasn't been included  
 23 against "Authorised" or "Assurance".

24 **A.** So, effectively, he's saying that this is  
 25 a policy that didn't hit the public domain?

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1 Q. Well, he said it -- he called it a draft.  
 2 A. Oh, right. I don't know whether it was or it  
 3 wasn't. I mean, I don't know -- I don't think  
 4 my name is on that policy.  
 5 Q. No, it hasn't got a review section in it, unlike  
 6 the last one.  
 7 A. I don't know. Having not had any responsibility  
 8 for it, is what I assume happened. I can't  
 9 contradict or add any value to what you've just  
 10 told me.  
 11 Q. Again, if we go forwards to page 3, please, we  
 12 see the policy set out. Under the heading,  
 13 "Protecting the Business", it reads:  
 14 "Highlighting crime facilitators,  
 15 investigators will identify (i) non-compliance  
 16 with security and operational procedures, (ii)  
 17 non-compliance with the code of business  
 18 standards (iii) failings in management control  
 19 and (iv) shortcomings in physical security."  
 20 Then under "Conduct of Investigations":  
 21 "The conduct, course and progress of  
 22 an investigation will be a matter for the  
 23 investigators as long as it is within the law,  
 24 rules and priorities of the business.  
 25 Investigators will ultimately read to the Head  
 65

1 Office will "prosecute offenders whose offences  
 2 significantly damage the public interest", was  
 3 that meant to add a gloss to what is the public  
 4 interest test?  
 5 A. I don't think that would have been adding  
 6 a gloss.  
 7 Q. Do you know what --  
 8 A. I don't think it would have been put in there to  
 9 add a gloss. I think it's probably -- the word  
 10 "significantly" shouldn't have been added.  
 11 Q. Well, also, "significantly damage the public  
 12 interest", whereas the public interest test is  
 13 rather different to that.  
 14 A. Yeah.  
 15 Q. It's whether it is in the public interest to  
 16 prosecute --  
 17 A. Yes, exactly.  
 18 Q. -- rather than whether the offence itself  
 19 significantly damages the public interest.  
 20 A. Sorry, I understand what you're saying, yeah.  
 21 Yes, I agree.  
 22 Q. That isn't the test within the Code for Crown  
 23 Prosecutors?  
 24 A. No.  
 25 Q. Thank you. That can come down.  
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1 of Security with regard to the conduct of  
 2 criminal investigations."  
 3 Again, do you identify the same difficulty  
 4 with that?  
 5 A. Yes, I would.  
 6 Q. Can we move forwards, please, to POL00030598.  
 7 This is January 2011.  
 8 If we scroll to the foot of the page,  
 9 please. We can see the date of January 2011;  
 10 can you see that?  
 11 A. Yes.  
 12 Q. In the top right, as well, "V2", January 2011.  
 13 A. Yes.  
 14 Q. If we scroll down to "Standards", please, thank  
 15 you:  
 16 "The general standard is to prosecute those  
 17 whose suspected offences significantly damage  
 18 the public interest. Compliance with the Code  
 19 for Crown Prosecutors will ensure that  
 20 inappropriate prosecutions are not pursued."  
 21 Then at 4.3:  
 22 "The ... Criminal Law Team will be familiar  
 23 with both the evidential and the public interest  
 24 tests in the Code ... and advise accordingly."  
 25 Just in relation to that line, 4.1 the Post  
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1 In your witness statement, you state that  
 2 policies were drafted by the Post Office. Who  
 3 in the Post Office was responsible for drafting  
 4 policies relevant to criminal investigation and  
 5 prosecution?  
 6 A. I think, generally speaking, it would be the  
 7 Security Director, although there were a couple  
 8 of policies I understand my name is on. I can't  
 9 remember the year. But I can remember why it  
 10 was probably delegated to me and it was because  
 11 we'd had a problem in one of the businesses  
 12 where the decision makers had effectively put  
 13 people back on duty, despite the fact that we'd  
 14 recommended that the evidential test had been  
 15 met and, I think, because of that, myself and  
 16 the Head of Investigations agreed that  
 17 an additional clause should go in that  
 18 particular policy that I signed my name to.  
 19 Q. You also tell us in paragraph 9 of your witness  
 20 statement that the policies were owned in the  
 21 main by the Security Directors at the time of  
 22 their implementation?  
 23 A. Yes.  
 24 Q. That is Messrs Wilson, Marsh and Scott?  
 25 A. Yes.  
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1 Q. You say that your role was to advise on  
2 policies. What would that consist of?  
3 A. Well, that would be basically, if there had been  
4 any change in legislation, any requirements that  
5 needed to be altered or removed and generally  
6 given oversight to what was being written.  
7 Q. In all of these policies, we don't see any  
8 mention of, for example, the duty of candour,  
9 the duty to pursue reasonable lines of inquiry  
10 and the disclosure obligations of a prosecutor?  
11 A. Yeah, disclosure was a massive topic and I think  
12 that the idea of having the policy was to have  
13 a very short, sweet, high-level document that  
14 somebody who was a third party could read and  
15 understand. And that, therefore, disclosure  
16 will have been dealt with by the training wing  
17 in a much more comprehensive way than to add it  
18 into the policy. I think we -- the decision  
19 would have been to keep them separate.  
20 Q. But, for example, "We will comply with the CPIA  
21 and the Code issued thereunder" or "We will  
22 comply with the *Attorney General's Guidelines* on  
23 disclosure", and then updating when new  
24 guidelines were issued in 2000, 2005, 2010, for  
25 example, not even those cross-references?

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1 Q. Can we look, please, at paragraph 9 of your  
2 witness statement, which is on page 6. Do you  
3 see halfway through, you say:  
4 "My role was to advise the Security Director  
5 and critique the content of those policies.  
6 I was also required to review the existing  
7 policies and advise on any changes that may be  
8 [required]. Each policy that was developed was  
9 reviewed annually but was not necessarily  
10 changed each year."  
11 Just stopping there, doesn't that suggest  
12 that it was your responsibility to review and  
13 critique the content of policies, advise on  
14 changes and to do so annually?  
15 A. Yeah, no, it does. But I think what would  
16 happen was, in reality, that Ray Pratt would  
17 come to me and say, "We need to have a look at  
18 the policy again", and we would sit down and  
19 look at the policy. And, from a legal  
20 perspective, that side of it would have been my  
21 responsibility.  
22 Q. So for the years that, by way of example, the  
23 policies said that in deciding on prosecutions  
24 or investigations regard is to be had to the  
25 priorities of the business, that was simply

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1 A. No. I think it was regarded as a ring-fenced  
2 topic that needed to be looked at on a regular  
3 basis and no doubt amended, as and when the  
4 Attorney General made new guidelines, or  
5 whatever.  
6 Q. You tell us that each policy was reviewed  
7 annually. What did the annual review consist  
8 of?  
9 A. Well, I think, the old policy will have been  
10 looked at and checked and a decision would have  
11 been made: is it fit for purpose for continuing  
12 for another year or do we need to add or detract  
13 from it?  
14 Q. Who undertook that annual review?  
15 A. I think Ray Pratt was Head of the Policy and  
16 Standards Team at the time.  
17 Q. Was it the function of the Policy and Standards  
18 Team, then, to undertake the annual reviews  
19 rather than --  
20 A. I believe so --  
21 Q. -- the Criminal Law Team?  
22 A. No, I believe it will have been -- the Policy  
23 and Standards Team will have reviewed it on  
24 a yearly basis. He may well have come and  
25 spoken to me about it and asked a view.

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1 overlooked, was it?  
2 A. Yeah, I think so, yes.  
3 Q. Or did that, in fact, reflect the reality that  
4 the priorities of the business were an important  
5 element in deciding on what to investigate and  
6 who to prosecute?  
7 A. No. I don't think -- the business interest was  
8 not of any concern to my team.  
9 Q. We've seen a series of documents identifying  
10 over the years -- I'm not going to take you to  
11 them now -- objectives being set for the  
12 Security Department to reduce the loss to the  
13 business through investigation and prosecution?  
14 A. Right.  
15 Q. Did any of that filter through to your team's  
16 decision making?  
17 A. I don't believe it did no.  
18 Q. In the last line here, you say:  
19 "I was responsible for seeing that any  
20 stipulations included in the policies were  
21 adhered to."  
22 That may be an incredibly broad statement.  
23 A. Yes.  
24 Q. What did you mean by it?  
25 A. Well, if we saw a file that was outside the

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1 policy, then that would be my responsibility to  
2 identify and address.

3 **Q.** You've written that in an expansive fashion  
4 there, which might be taken to include  
5 responsibility for ensuring that all of the  
6 Investigators were doing all of the things that  
7 the policies required them to do. That plainly  
8 wasn't the case?

9 **A.** No, I -- no. That wouldn't have been the case,  
10 no.

11 **Q.** So what did you, in fact, mean, then?

12 **A.** Well, what I mean is that, at a high level,  
13 ultimately I was responsible for every  
14 prosecution, it was my call and that, because it  
15 was my call and because it was my  
16 responsibility, if I'd identified anything that  
17 was outside the policy, then I needed to deal  
18 with it.

19 **Q.** You said there "it was my responsibility and my  
20 call".

21 **A.** Yes.

22 **Q.** What did you mean by that?

23 **A.** Well, I was head of the Criminal Law Team so  
24 I was responsible for the prosecutions. At any  
25 particular stage, I could be summonsed into

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1 policy references to the decision maker as being  
2 from the Personnel Department of each Business  
3 Unit following advice from the [Criminal Law  
4 Team]. This later changed to a nominated  
5 representative in the Business [that's the  
6 policy of April 2010]. The [2011 policy]  
7 specified the decision maker as the Senior  
8 Security Manager for [the Post Office]."

9 Just breaking that down, in 1997 until you  
10 joined, the decision maker on whether to  
11 prosecute was a member of the Personnel  
12 Department?

13 **A.** Yes.

14 **Q.** So from Human Resources?

15 **A.** Yes.

16 **Q.** It says, "from each Business Unit". What does  
17 that refer to in this context?

18 **A.** Well, the business units were Royal Mail, Post  
19 Office Limited, Parcelforce. I think there were  
20 just the three.

21 **Q.** So somebody in Personnel, in our case, from Post  
22 Office Limited?

23 **A.** Yes. Ah, now, no, I think -- some of the  
24 prosecution policies refer in some of the -- in  
25 one of the paragraphs towards the end of the

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1 court, maybe a Crown Court -- which did actually  
2 happen on one occasion -- and I couldn't say,  
3 "Well, this is the Investigator's fault". I had  
4 to admit any responsibility if there was  
5 a problem because it -- I was in charge.

6 **Q.** When you said, "it was my call", did you mean it  
7 was your call to decide whether to prosecute or  
8 not?

9 **A.** No, no, no, not that.

10 **Q.** What was your call, then?

11 **A.** My call was I was responsible for every  
12 prosecution that we signed our name to. That's  
13 what I mean.

14 **Q.** Can we turn to the decision maker in  
15 prosecutions then, please, and can we turn to  
16 paragraph 6 in your witness statement, which is  
17 on page 4.

18 You set out for us helpfully here -- and, in  
19 fact, it's just above that. It's paragraph 5,  
20 at the top of the page, thank you.

21 You set out for us helpfully here the  
22 prosecution decision maker and you say, when you  
23 first came into the CLT:

24 "... the decision to prosecute was taken by  
25 Senior Investigation Managers ... The 1997

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1 policy that Post Office Limited adhered to the  
2 general Royal Mail policy but also had their own  
3 specific guidelines processes and procedures,  
4 and I think it's a paragraph towards the end of  
5 the 2007 and 2011 policies.

6 **Q.** We'll come to that later. At the moment we're  
7 just dealing with 1997 --

8 **A.** Right, okay.

9 **Q.** -- and decision maker from Human Resources.

10 **A.** Yes, that must be right, yes.

11 **Q.** So did the person from Human Resources have  
12 a copy of the Code for Crown Prosecutors?

13 **A.** Yes, yes, they were trained specifically by  
14 myself and Phil Gerrish, who was Head of  
15 Investigations. We went around the country. We  
16 prepared a -- what was a dummy investigation  
17 file. We -- and we prepared a dummy standard  
18 letter that the -- one of the solicitors would  
19 have written, in terms of the evidence and the  
20 public interest, and we gave them a copy of the  
21 Code for Crown Prosecutors and we explained --  
22 we went through and explained what to look for  
23 in the file, what to look for in the Code and  
24 went through the public interest test that was  
25 in the Code.

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1 Q. That dummy letter, was that essentially  
 2 a template for them to issue?  
 3 A. No, that --  
 4 Q. -- if they decided to prosecute?  
 5 A. No. The dummy letter was a letter that they  
 6 would receive on the papers that had been  
 7 written by one of the lawyers authorising  
 8 prosecution -- sorry, providing information  
 9 about the evidence. They were the one who  
 10 authorised the prosecution.  
 11 Q. Do you know what the rationale was for giving  
 12 the prosecutorial decision-making function to  
 13 people within HR?  
 14 A. Yeah, I think it was basically Andrew Wilson had  
 15 identified a team that was independent of the  
 16 Investigation team and that could give  
 17 an overall view of what was in the public  
 18 interest; somebody who was independent,  
 19 basically.  
 20 Q. So these people would be looking at the offender  
 21 report that they were given and all of the  
 22 underlying material, witness statements and  
 23 exhibits; is that right?  
 24 A. Yeah, so they'd be looking at a complete file.  
 25 Q. They would be expected to read the witness

1 test.  
 2 Q. What material were they given in order to make  
 3 that decision?  
 4 A. Well, yeah, following your question before the  
 5 last one, I don't know whether they did get  
 6 a full file now but they got a version of the  
 7 file.  
 8 Q. What was the version of the file?  
 9 A. I imagine --  
 10 Q. -- they got?  
 11 A. -- it was information about the alleged crime,  
 12 so it will have been, I guess, a report,  
 13 possibly the interview, maybe one or two other  
 14 documents. I can't remember.  
 15 Q. So they made no decision at all on evidential  
 16 sufficiency?  
 17 A. No.  
 18 Q. That decision had already been taken by  
 19 a lawyer?  
 20 A. Yeah, the lawyer had already -- effectively  
 21 saying there was sufficient evidence to  
 22 prosecute, yes.  
 23 Q. Your statement says that they would take the  
 24 decision following advice from the Criminal Law  
 25 Team. Was that advice about the public interest

1 statements and the exhibits?  
 2 A. Um, actually -- I -- no. I don't -- I can  
 3 picture the file in my brain, which seems like  
 4 a large file but it may not have been. It may  
 5 have simply been a truncated file.  
 6 Q. In what respect was it truncated? What did it  
 7 not include?  
 8 A. Yeah, well, their decision was whether it was in  
 9 the public interest or not. They weren't there  
 10 to look at the evidence in terms of whether  
 11 there was sufficient evidence. We --  
 12 Q. Hold on. Why was that --  
 13 A. Well, because --  
 14 Q. -- and where does it say that?  
 15 A. Because the lawyer was the person who made the  
 16 decision on whether there was sufficient  
 17 evidence to prosecute. They were simply  
 18 deciding on whether it was in the public  
 19 interest.  
 20 Q. Right, and so the decision on sufficiency of  
 21 evidence had already been made?  
 22 A. Yes, effectively, the lawyer had made the  
 23 decision that the evidence was sufficient to  
 24 prosecute. What we wanted from them was to make  
 25 an independent decision on the public interest

1 test too?  
 2 A. Yes. Usually, the advice would be pretty  
 3 limited in terms of the size of the theft or any  
 4 other information that was pertinent.  
 5 Q. Can we go, please, to POL00030659. And look at  
 6 page 4, please, under paragraph 6, "The  
 7 Prosecution process". This is the 1997 Andrew  
 8 Wilson policy. It reads:  
 9 "In order to streamline the process and to  
 10 facilitate a consistent approach, it is  
 11 recommended that a single point within the  
 12 Personnel Department of each Business Unit  
 13 should make decisions on prosecutions, following  
 14 advice from Legal Services Department as to the  
 15 likelihood of success and the potential for  
 16 embarrassment to be caused to the Post Office."  
 17 That's rather different from how you  
 18 explained it just now, isn't it?  
 19 A. Yeah, I mean, this is a policy in 1997 that --  
 20 Q. I'm only dealing with the 1997 policy at the  
 21 moment.  
 22 A. Right.  
 23 Q. I've not moved forward to 2007, to 2010 or 2011.  
 24 A. Yeah, that's not my understanding of what  
 25 actually happened.

1 Q. Because this, on its face, suggests that the HR  
2 person is going to make all decisions on  
3 prosecution, yes? It doesn't divide it up  
4 into --

5 A. No, it doesn't.

6 Q. -- sufficiency and public interest, does it?

7 A. I'm not sure how you describe this document, the  
8 words that you used when you actually described  
9 the document. But this, for me, is not  
10 a prosecution policy document; it's a paper  
11 that --

12 Q. I was taking -- I mean, I described it as  
13 a discussion paper.

14 A. Yeah.

15 Q. In your witness statement, you say, "The 1997  
16 policy refers to the decision maker as being  
17 from the Personnel Department" --

18 A. Yes.

19 Q. -- referring to this.

20 A. Yes, I accept that it was the policy that Andrew  
21 Wilson put out but I think that you are accurate  
22 in what you say: it's more of a discussion  
23 document than a proper policy.

24 **SIR WYN WILLIAMS:** Sorry to intervene but does that  
25 mean that there was no written policy, at least

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1 nature of this document is for a bit of further  
2 help. It says:  
3 "The proposals in this paper have been  
4 formulated [et cetera]. Personnel Strategy  
5 Steering Group are invited to endorse them as  
6 Post Office POLICY", in capital letters."  
7 But I don't think we've got a document that  
8 either carries that into effect or says, "No,  
9 something different is going to occur".  
10 So, just on paragraph 6 as it's worded, it  
11 would be wrong to take from that that the HR  
12 people were making decisions about both limbs of  
13 the test, correct?

14 A. Yes, correct.

15 Q. It would be wrong to take from that that the  
16 Legal Services Department were giving advice to  
17 the HR team about sufficiency of evidence. They  
18 were taking decisions on sufficiency of  
19 evidence?

20 A. Yes, the Criminal Law Team were taking  
21 decisions.

22 Q. Thirdly, it would be wrong to say that the  
23 Criminal Law Team were giving advice as "to the  
24 potential for embarrassment to be caused to the  
25 Post Office as a relevant consideration"?

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1 that the Inquiry has discovered, until 2007?

2 A. Well, sir, I think there were policies. Whether  
3 they've been discovered or not and where they're  
4 lurking and what year they were prepared, but  
5 there was -- you know, I'm pretty sure there was  
6 more than that, but I can't tell you when or  
7 where they are. And I can't believe that it  
8 went from 1997 to 2007, 10 years, without  
9 a prosecution policy being in place, a proper  
10 one.

11 **SIR WYN WILLIAMS:** Forgive me, but the impression  
12 I'm getting from you is that this document  
13 itself did not become, in the formal sense,  
14 a policy. It was, as Mr Beer and you have  
15 discussed, more in the nature of a discussion  
16 paper.

17 A. Well --

18 **SIR WYN WILLIAMS:** So that would mean that, for very  
19 many years, so far as we know at the moment, let  
20 me put it in that way -- or in case other people  
21 know more than me, so far as I am aware -- there  
22 is no written adopted policy covering the period  
23 1997 to 2007.

24 A. Yes, sir, that appears to be the position, yes.

25 **MR BEER:** We can look at paragraph 7 to see what the

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1 A. Yeah, I can't -- I don't recall ever doing that.

2 Q. Can we move forwards then, please, to 2007,  
3 which we've looked at already. It's  
4 POL00030578. It's page 3 and paragraph 3.2.9:  
5 "Suspect offenders will be prosecuted where  
6 this sufficient evidence and it is in the public  
7 interest in accordance with the Code for Crown  
8 Prosecutors. Decisions to prosecute in  
9 [non-CPS] cases will be taken by nominated  
10 representatives in the business with  
11 consideration to the advice provided by the  
12 Royal Mail Group Criminal Law Team."  
13 So from 2007, taken out of the hands of  
14 Human Resources; is that right?

15 A. Yes, but it was, again, somebody within the  
16 business. I think it was -- the wording was  
17 used is "nominated representative"?

18 Q. Yes. Who were the nominated representatives  
19 within the business --

20 A. In 2000 --

21 Q. -- from 2007 onwards, taking decisions on  
22 prosecutions?

23 A. I don't recall which team was nominated  
24 representatives. I can't recall.

25 Q. As a matter of practice, from 2007 onwards, who

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1 was taking decisions on whether a subpostmaster  
 2 or counter clerk should be prosecuted?  
 3 **A.** Somebody outside of the Investigation team.  
 4 **Q.** But who?  
 5 **A.** I don't remember which team it was.  
 6 **Q.** But they were now taking decisions on both limbs  
 7 of the test; is that right?  
 8 **A.** No.  
 9 **Q.** What was happening, then?  
 10 **A.** Well, it was the same as before. Basically, the  
 11 Criminal Law Team would advise on the evidence  
 12 and, if there was sufficient evidence with  
 13 a realistic prospect of securing a conviction,  
 14 the papers would then go to whoever was the  
 15 nominated representative within the business to  
 16 decide on the public interest factor.  
 17 **Q.** So this is wrong too?  
 18 **A.** Is it wrong?  
 19 **Q.** Well, this appears to suggest that both limbs  
 20 are being taken by this nominated  
 21 representative -- sorry, both limbs of the test  
 22 are being considered by this nominated  
 23 representative of the business but that's with  
 24 consideration to the advice provided by the  
 25 Criminal Law Team. Whereas, on your account,

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1 **Q.** Can you help us with what's happened there?  
 2 **A.** Basically, I think that what that means is that,  
 3 in September 2008, this policy came to fruition  
 4 and then, between 2008 and 2011, it will have  
 5 been reviewed each year but this, in 2011, was  
 6 being reissued.  
 7 **Q.** I see. So the update was effective from April  
 8 2011, albeit the policy in a potentially  
 9 different form had been created from and was  
 10 effective from September 2008?  
 11 **A.** Yeah, I think that's what this means, yes.  
 12 **Q.** Okay, let's take this as being effective from  
 13 September 2008 then and can we turn to the  
 14 second page, please, and look at paragraph 4,  
 15 and 4.1:  
 16 "The decision to prosecute Royal Mail Group  
 17 investigation cases in England and Wales will be  
 18 reached in agreement between the Human Resources  
 19 Director for the affected business unit or his  
 20 or her nominated representative, the nominated  
 21 representative from the Investigation team and  
 22 the lawyer advising."  
 23 Can you see this is a yet further difference  
 24 from that which we've seen before?  
 25 **A.** Yeah, I mean, I think what's -- what that's

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1 what it should say is "There are two limbs to  
 2 the test, evidential sufficiency and public  
 3 interest. The Criminal Law Team will take  
 4 decisions as to the first limb, sufficiency of  
 5 evidence, and will make a decision as to whether  
 6 there's a realistic prospect of conviction".  
 7 Full stop. "A nominated representative of the  
 8 business will take decisions as to the second  
 9 limb of the test, the public interest test, in  
 10 accordance with the Code for Crown Prosecutors.  
 11 They may do that by considering the advice  
 12 provided by the Criminal Law Team".  
 13 **A.** Yeah. The nominated representative didn't take  
 14 decisions on the evidence. It was purely the  
 15 public interest test.  
 16 **Q.** So this policy doesn't represent reality either?  
 17 **A.** Not on that wording, no.  
 18 **Q.** Can we turn, please, to September 2008 and  
 19 POL00030800. Can you see that you're the owner  
 20 of this policy?  
 21 **A.** Yes.  
 22 **Q.** It says it was dated or created in September  
 23 2008 but it's effective from two and a half  
 24 years later?  
 25 **A.** Yes.

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1 saying is, effectively, the lawyer will advise,  
 2 and the -- again -- I mean, it's not worded in  
 3 this way, but again, the Human Resources  
 4 Director will make the decision.  
 5 **Q.** Which decision?  
 6 **A.** On the public interest test.  
 7 **Q.** Again, it doesn't say any of that, does it?  
 8 **A.** No, it doesn't say that.  
 9 **Q.** So this is the third policy that we've looked at  
 10 that doesn't say what it should; is that right?  
 11 **A.** That's right.  
 12 **Q.** So how has that come about? You, I think, wrote  
 13 this?  
 14 **A.** Yeah, I -- I don't know how it's come about. It  
 15 would have been so easy to put it in more  
 16 appropriate wording.  
 17 **Q.** But you're telling us that's what written as the  
 18 prosecution decision-making policy here is not  
 19 correct, in that it did not reflect reality?  
 20 **A.** Well, in one sense, the Human Resources Director  
 21 will reach the decision to prosecute because he  
 22 has the final decision on whether it's in the  
 23 public interest. And the lawyer was advising  
 24 that the evidential test had been met, so it  
 25 just is not specifically referring to those two

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1 facts.

2 **Q.** Well, it's saying that it's a three-way  
3 decision, in which there must be agreement, and  
4 it doesn't divide the test into two. Correct?

5 **A.** Yes.

6 **Q.** To what extent did a nominated representative  
7 from the Investigation team, in fact,  
8 participate in decision making on either  
9 evidential sufficiency or the public interest?

10 **A.** They -- I don't know whether this is one of the  
11 policies which changed the wording in relation  
12 to where somebody had been placed back on duty  
13 or not. But if this was one of the policies,  
14 I think the wording for that included the Head  
15 of Investigations and myself, as being --  
16 advising the nominated representative.

17 This I what I referred to before where  
18 a number of individuals were put back on duty  
19 and effectively precluded us pursuing  
20 a prosecution.

21 **Q.** Can I ask the question a different way again.  
22 Did a member of the Investigation team  
23 participate -- sorry, a nominated representative  
24 from the Investigation team participate in  
25 decision making on evidential sufficiency?

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1 Manager ..."

2 Just shopping there, the cases that we are  
3 considering are all Post Office Limited cases --

4 **A.** Yes.

5 **Q.** -- so it's the Senior Security Manager that we  
6 are considering?

7 **A.** Yes.

8 **Q.** "... will act as the 'Decision Maker' in  
9 authorising prosecutions or not. All Decision  
10 Makers will be familiar with evidential and the  
11 public interest tests of the Code for Crown  
12 Prosecutors and make decisions accordingly."

13 The document embeds the Code in it and draws  
14 attention to the pages on which the two tests  
15 are set out. So does it follow that, from  
16 January 2011 onwards, the Senior Security  
17 Manager took all decisions as to authorise  
18 a prosecution and they took decisions both as to  
19 evidential sufficiency and public interest?

20 **A.** It shouldn't have been evidential.

21 **Q.** So this is wrong too?

22 **A.** Yeah. The lawyer would have done that. But  
23 they did take the overall decision whether to  
24 prosecute or not.

25 **Q.** So, again, this should bifurcate the process

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1 **A.** No.

2 **Q.** Why does it say that they do?

3 **A.** The only reason I can think of is where, as  
4 I just pointed out, that we had this problem  
5 but, no, they didn't.

6 **Q.** Did a nominated representative from the  
7 Investigation team participate in decision  
8 making on the public interest?

9 **A.** No.

10 **Q.** Why does it suggest that they do?

11 **A.** It shouldn't have.

12 **Q.** But why does it? Why is it, in almost every  
13 material respect, wrong?

14 **A.** I don't know.

15 **Q.** Can we move forwards, please, to January 2011,  
16 and we looked at this before. It's POL00030598.  
17 Remember, we looked at this, January 2011. If  
18 we go down to paragraphs 4.3 and 4.4, which is  
19 at the foot of the page, 4.3:

20 "The ... Criminal Law Team will be familiar  
21 with both the evidential and the public interest  
22 tests in the Code ... and [will] advise  
23 accordingly.

24 "The ... Human Resources Director, or in  
25 Post Office Limited cases the Senior Security

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1 between evidential sufficiency and public  
2 interest, saying that evidential sufficiency is  
3 the decision of the lawyer and public interest  
4 is the decision of the Senior Security Manager?

5 **A.** Yes.

6 **Q.** So all relevant policy documents failed to  
7 describe accurately the Post Office's  
8 prosecution decision-making process; is that  
9 right?

10 **A.** Yes.

11 **Q.** Can we take that down, please, and move on.  
12 In paragraph 5 of your witness statement,  
13 perhaps if we turn that up, which is on page 3  
14 of your witness statement, you say:

15 "The [Criminal Law Team's] role so far as  
16 the policies and practices relating to the  
17 prosecution of subpostmasters, managers,  
18 assistants and Crown Office employees was to  
19 assess the evidence obtained, independently and  
20 consider whether the evidence was reliable and  
21 credible."

22 Yes?

23 **A.** Yes.

24 **Q.** That mirrors an answer to a couple of questions  
25 that I asked you earlier about whether the

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1 lawyer was to include, as part of their  
2 function, an assessment of reliability and  
3 credibility of evidence.

4 In cases founded on Horizon data, did the  
5 lawyer's function, therefore, include  
6 an assessment of whether the Horizon data was  
7 reliable and credible?

8 **A.** Yes.

9 **Q.** Did it include that duty, even if the suspect  
10 had not suggested in interview or otherwise that  
11 there was likely to be or potentially a problem  
12 with the Horizon system?

13 **A.** Yes.

14 **Q.** Is that because of the answer that you gave  
15 earlier: that if you're founding a prosecution  
16 on computer-based evidence, you need to assess  
17 the reliability and credibility of the evidence  
18 produced by the computer?

19 **A.** Yes.

20 **Q.** Is it right that there was some resistance  
21 within the Criminal Law Team to the CPS  
22 prosecuting any cases involving Horizon data?

23 **A.** Yes, we would prefer to have prosecuted our own  
24 cases.

25 **Q.** Why was that?

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1 control over any case that's not being  
2 prosecuted by my team."

3 What were the additional difficulties you  
4 referred to in the first line?

5 **A.** Well, it would be to do with whether the police  
6 could obtain the relevant information from  
7 Fujitsu, whether they would know where to obtain  
8 the evidence in relation to the -- that they  
9 would need in relation to the prosecution and,  
10 basically, how the system worked, whether they  
11 would be able to glean enough information to  
12 sustain the prosecution.

13 **Q.** This exchange here is all in the middle of  
14 a discussion, I think you'll be aware, over  
15 what, in the title is described as "Horizon  
16 disputed cases", and whether to get in  
17 an external reviewer to validate the robustness  
18 of Horizon?

19 **A.** Yes.

20 **Q.** If there was no concern or question about  
21 Horizon's integrity being able to be evidenced  
22 in court, why were you expressing a concern that  
23 you would lack control over any case that isn't  
24 prosecuted by your team?

25 **A.** Well, it depended how the CPS would react to the

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1 **A.** Well, because we -- we had a team of  
2 investigators who were familiar with the  
3 processes and procedures in Post Office Limited,  
4 and we felt that we, of course, were familiar  
5 with the prosecutions and we thought it would be  
6 easier for us to continue the prosecutions.

7 I mean, I know that some CPS did actually  
8 prosecute our cases but, if they wanted to  
9 retain the papers, then they would retain the  
10 papers and that was the end of it.

11 **Q.** Can we look, please, at POL00106867, please.

12 This is a long email chain. Can we look at  
13 page 7, please. We're going to come back to  
14 this chain later on today but can we see here  
15 an email from you to Sue Lowther, Andy Hayward,  
16 Dave King, Dave Posnett and David Smith, that's  
17 David X Smith -- yes --

18 **A.** Yes.

19 **Q.** -- dated 9 March 2010. You say:

20 "We have additional difficulties in relation  
21 to challenges to Horizon. Today I have been  
22 made aware of a prosecution being conducted by  
23 the CPS where Horizon is being challenged. The  
24 case may already have been identified by you.

25 The difficulty however will be our lack of

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1 prosecution and react to requests for  
2 disclosure.

3 **Q.** But, Mr Wilson, if the CPS were applying the  
4 same Code tests, why would the Post Office be  
5 concerned about any question of Horizon  
6 integrity being raised in a CPS-led prosecution?

7 **A.** Because they might not know where to go to  
8 obtain the evidence.

9 **Q.** You could tell them, "Just go off to Fujitsu,  
10 they'll help you out like they help us out"?

11 **A.** Yes, I could, if they asked a question, yes.

12 **Q.** You refer in the last paragraph to the "lack of  
13 control". In what way did your team exert  
14 control over prosecutions involving Horizon  
15 challenges?

16 **A.** Well, our control would be over the  
17 Investigators and whether they'd obtained  
18 sufficient evidence.

19 **Q.** Were you concerned that, if the CPS were  
20 involved in cases concerning challenges to  
21 Horizon integrity, that the control that your  
22 team exerted over the revelation of problems  
23 with Horizon integrity would be lost?

24 **A.** I don't think we were controlling the revelation  
25 of Horizon issues.

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1 Q. Is this a reference to the need to close down  
2 challenges to the integrity of Horizon --  
3 A. No.  
4 Q. -- to protect the position or the commercial  
5 position of the Post Office?  
6 A. No.  
7 Q. So why couldn't the Post Office just signpost  
8 the CPS, if it was necessary, to Fujitsu?  
9 A. Well, we could have done, if they'd asked us the  
10 question -- asked the question.  
11 Q. You think that they wouldn't ask the question?  
12 A. Well, I don't know what they would have asked.  
13 All I think that had happened here is I'd been  
14 told that the CPS were prosecuting one of the  
15 cases. So I'm not sure that I even knew where  
16 it was at the time.  
17 Q. Were you essentially highlighting a red flag or  
18 raising a red flag here by saying, "Hold on, we  
19 can't just control our own prosecutions, the  
20 ones conducted by my team. If we start  
21 independently investigating Horizon through the  
22 use of an external expert, we've got to take  
23 into account what the CPS might do with such  
24 evidence".  
25 A. No, I mean, I can remember speaking to the Crown  
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1 would submit those to the Investigator to  
2 identify any material that required to be  
3 disclosed.  
4 If there was any issue in relation to the  
5 defence statement and it needed explaining, we  
6 would contact the solicitor and request  
7 an explanation. We would resubmit any papers to  
8 the defence that provided additional disclosure  
9 that the Investigator had identified from the  
10 defence statement and we would keep the case  
11 continually under review until its conclusion.  
12 Q. Thank you. In all of that, you mentioned going  
13 back to the Investigator. You didn't mention  
14 a Disclosure Officer.  
15 A. Well, yeah, the Disclosure Officer could be the  
16 Investigator, normally was the Investigator. If  
17 the case was particularly complex or voluminous,  
18 then a separate Disclosure Officer would be  
19 designated to deal with disclosure on that  
20 particular case.  
21 Q. Did that happen in practice?  
22 A. Yes.  
23 Q. Was the process any different in cases which  
24 involved a challenge to the integrity of Horizon  
25 data?  
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1 Prosecution Service about some of our cases that  
2 they had but I would speak to them because I had  
3 knowledge of where they were and who they are  
4 and I had a contact point and, no doubt, that  
5 was found out by the Investigator. So I'd ring  
6 them up and have a discussion. So I was  
7 perfectly happy to help the CPS if they needed  
8 assistance.  
9 Q. That can come down, thank you.  
10 Can we turn to a different topic,  
11 disclosure. How did you and your colleagues in  
12 the Criminal Law Team supervise the conduct of  
13 the disclosure process in criminal proceedings?  
14 A. You mean on an individual case basis?  
15 Q. Yes. Yes, if you can describe what processes  
16 were in place, the roles undertaken by your  
17 team?  
18 A. Well, we would receive the case papers from the  
19 investigator and he would be asked to prepare  
20 a schedule of non-sensitive unused material and  
21 highlight whether there was any material that  
22 undermined or assisted -- undermined our case or  
23 assisted the defence. And, when the case had  
24 been committed for trial, we would receive  
25 defence case statements from the defence and we  
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1 A. No, I don't think so.  
2 Q. Were any special instructions given to  
3 Investigators or Disclosure Officers in cases  
4 involving challenges to the integrity of  
5 Horizon, as to what they should do about  
6 disclosure, in terms of to whom they should turn  
7 in Fujitsu or within other parts of the Post  
8 Office to obtain appropriate disclosure?  
9 A. I think the Investigators knew more about who  
10 worked in the different areas within Fujitsu  
11 than we -- than the lawyers will have known.  
12 And, therefore, they will have had -- they will  
13 have developed contact points within Fujitsu to  
14 obtain the relevant information that they needed  
15 to obtain.  
16 Q. Can I look at something that the Court of Appeal  
17 Criminal Division noted when considering  
18 disclosure in its judgment in the *Hamilton and*  
19 *others* appeals. It, in fact, involves the *Seema*  
20 *Misra* case. We're going to return to that in  
21 detail in December but I just want to look at  
22 this for present purposes because it concerns  
23 the completion of an unused material schedule.  
24 Can we turn up, please, POL00113278 and can  
25 we turn to page 24, please. It's paragraph 91.  
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1 The court says:

2 "The material which we have seen includes  
3 other indications of the approach to Horizon  
4 issues taken by at least some [Post Office  
5 Limited] personnel involved in the conduct of  
6 these and similar prosecutions. For example, in  
7 relation to the prosecution of Seema Misra,  
8 an appellant in whose case it is now accepted  
9 that there was a failure of disclosure ..."

10 Then it continues. It goes to (ii). It  
11 speaks about a schedule of sensitive material  
12 being prepared. I'm not actually convinced that  
13 this schedule of material was a schedule  
14 relating to Seema Misra's case, despite what  
15 Lord Justice Holroyde says, but that does not  
16 matter for present purposes because it is  
17 an unused material schedule.

18 It reads:

19 "On 15 January ... a schedule of sensitive  
20 material was prepared. The Disclosure Officer  
21 who signed it stated that she believed the  
22 single item listed on the schedule was  
23 sensitive. The item was described as 'Article  
24 relating to integrity of Horizon system,  
25 supplied with accompanying letter by defendant'.

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1 schedules, both sensitive and non-sensitive?

2 **A.** Well, we would look at the schedule, we would  
3 copy the material and we would tick off,  
4 effectively, whether it was -- whether we agreed  
5 that it was rightly placed on the schedule of  
6 unused material or whether it should have been  
7 placed on another material, or whether it  
8 undermined the prosecution case or supported the  
9 defence.

10 So we would have a look at the individual  
11 items. We would ensure that where there were  
12 a large number of documents that were being  
13 produced under a generic title, that they were  
14 split up and described more properly, and we  
15 would generally critique what we'd received.

16 **Q.** So it follows that this schedule would have  
17 passed through or passed across the eyes of  
18 a member of your Criminal Law Team?

19 **A.** Yes.

20 **Q.** I think you'd probably agree that it therefore  
21 paints something of a poor picture in relation  
22 to the safeguards in place?

23 **A.** Yes.

24 **Q.** Was what we read here indicative of the attitude  
25 of the Security team to challenges to Horizon,

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1 The reason for sensitivity was said to be 'Could  
2 be used as mitigation, ie to blame Horizon for  
3 loss'. Given that the item appears to have been  
4 a document supplied by the defence, the  
5 appellant was not in fact deprived of material  
6 she should have seen; but the important point  
7 for present purposes is that a [Post Office]  
8 employee acting as Disclosure Officer felt it  
9 appropriate to treat a document as sensitive,  
10 and withhold it from disclosure, because it  
11 could be used to assist the defence. Such  
12 an approach to disclosure is plainly wrong, but  
13 it does not appear that any action was taken by  
14 anyone on behalf of [Post Office Limited] to  
15 correct the officer's serious error."

16 I think you would probably agree that  
17 an approach of listing an article that came from  
18 the defendant, which sought to blame Horizon for  
19 the loss and, therefore, could be used as  
20 mitigation is not a sufficient reason to put  
21 an item on an unused material sensitive  
22 schedule?

23 **A.** Yes.

24 **Q.** What level of supervision did your team exercise  
25 over the completion of unused material

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1 namely that they were seen as sensitive and  
2 something that should be hidden away?

3 **A.** I don't think that was indicative. I think --

4 I don't know who the Disclosure Officer was, but  
5 it was completely inappropriate that -- and  
6 plainly wrong that that item should have been on  
7 a schedule of sensitive material.

8 **Q.** Was it the case that the unearthing of any  
9 criticism of Horizon, even if it came from the  
10 defence, ought to be avoided because it was  
11 sensitive for the Post Office?

12 **A.** You'll have to ask the Investigators that, but  
13 I wouldn't have believed -- it's  
14 an extraordinary decision that this particular  
15 Investigator made in relation to that document.

16 **MR BEER:** Thank you.

17 Sir, we're about to turn to a new topical.

18 I wonder whether we might break until 2.00.

19 **SIR WYN WILLIAMS:** Of course. So we'll resume at  
20 2.00.

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

22 (12.59 pm)

23 (The Short Adjournment)

24 (2.00 pm)

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

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1 me?

2 **SIR WYN WILLIAMS:** Yes, thank you.

3 **MR BEER:** Thank you very much. In a moment I'm  
4 going to turn back to one additional set of  
5 questions on prosecutorial policies and who was  
6 responsible for decision making, but there's  
7 a slight IT problem which needs to be resolved  
8 before I do so. So can we turn to a separate  
9 topic, please, which is expert evidence.

10 Can we turn up page 23 of your witness  
11 statement, please. It's paragraph 51. You tell  
12 us the guidance given to expert witnesses called  
13 on behalf of the Post Office was the same as  
14 that of a non-expert witness, namely that the  
15 witness statement should be truthful and, if it  
16 were otherwise, they could be liable to  
17 prosecution, yes?

18 **A.** Yes.

19 **Q.** Then, in the remainder of the paragraph, is this  
20 right, you go on to tell us about some duties  
21 that an expert, in fact, owes?

22 **A.** Yes.

23 **Q.** So dealing with the first sentence then, what  
24 guidance was given to expert witnesses --

25 **A.** I don't recall --

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1 put, if I may, some elements of the evidence  
2 that we heard to see whether you agree or  
3 disagree with them.

4 Would you agree that the prosecutor must  
5 provide an expert with instructions as to the  
6 issue or issues upon which his or her opinion is  
7 sought?

8 **A.** Yes.

9 **Q.** Would you agree that the prosecutor must provide  
10 the expert with questions which the expert is  
11 expected to address or to answer?

12 **A.** Yes.

13 **Q.** Would you agree that the prosecutor must supply  
14 an expert with material upon which the  
15 prosecution relies and which may be relevant to  
16 the questions which the expert is expected to  
17 answer?

18 **A.** Yes, if the evidence is relevant, yes.

19 **Q.** Do you agree, secondly, that, throughout this  
20 period, 2000 to 2013, a prosecutor intending to  
21 rely on expert evidence in criminal proceedings  
22 was under a duty to satisfy themselves as to the  
23 expert's relevant qualifications and expertise?

24 **A.** Yes.

25 **Q.** They were required to satisfy themselves that

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1 **Q.** Hold on. I haven't asked the question yet,  
2 sorry. I was pausing myself.

3 **A.** Okay.

4 **Q.** In relation to what you say there, the guidance  
5 given was the same as a non-expert witness  
6 namely they should be told to tell the truth  
7 and, if it proved otherwise, they could be  
8 liable to prosecution. That tends to suggest  
9 that they were told two things, yes, and they  
10 were only told those things that also applied to  
11 a witness of fact, a non-expert; is that right?

12 **A.** Sorry, say that again, please?

13 **Q.** Yes. It tends to suggest that they were told  
14 the same things as applies applied to a witness  
15 of fact, a non-expert witness, namely the duty  
16 to tell the truth, and the consequences if they  
17 didn't tell the truth, ie they could be  
18 prosecuted?

19 **A.** Yes.

20 **Q.** You may know that we've received some expert  
21 evidence ourselves on the duty of an expert  
22 witness across the period 2000 to 2013 on the  
23 relevant duties of an expert witness, and upon  
24 the duties upon a prosecutor seeking to rely on  
25 an expert witness across that period. I want to

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1 the expert had been appropriately instructed,  
2 including by the provision of a letter of  
3 instruction or terms of reference?

4 **A.** Yes.

5 **Q.** That they were required to satisfy themselves  
6 that the expert had been informed as to their  
7 relevant duties, including a duty to the court?

8 **A.** Yes.

9 **Q.** The prosecutor, in that period, was required,  
10 would you agree, to satisfy themselves that the  
11 expert had understood and had complied with  
12 their duties to the court?

13 **A.** Yes.

14 **Q.** They, the prosecutor, would you agree, was  
15 required to satisfy themselves that any  
16 literature or material which undermines the  
17 expert's conclusions had been reviewed by the  
18 prosecutor and, where appropriate, disclosed to  
19 the defence?

20 **A.** Yes.

21 **Q.** And lastly, the prosecutor was required to bring  
22 to the attention of the defence and to the court  
23 any material which the prosecutor was aware was  
24 reasonably capable of undermining the expert's  
25 opinion --

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- 1 **A.** Yes.
- 2 **Q.** -- and that includes matters relating to the  
3 expert's qualifications, the factual basis for  
4 their opinions and their credibility?
- 5 **A.** Yes.
- 6 **Q.** Thirdly, would you agree that, if a prosecutor  
7 wishes to rely on an expert witness in this  
8 period, the prosecutor must be or is duty bound  
9 to ensure that the individual concerned, the  
10 expert, actually understands that they're giving  
11 evidence in the capacity of expert witness and,  
12 therefore, special duties apply to them?
- 13 **A.** Yes.
- 14 **Q.** Fourthly, would you agree that any duties of  
15 disclosure that are required to be discharged  
16 are those of the prosecutor and that they can't  
17 subcontract them to the expert themselves?
- 18 **A.** Yes.
- 19 **Q.** Fifthly, would you agree that, if a party seeks  
20 to rely on an expert who is not functionally  
21 independent of a party in the case, then the  
22 party is under a particular obligation to show  
23 that the expert understands the duties to which  
24 he or she is subject --
- 25 **A.** Yes.

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- 1 cross-examined by the defence and  
2 examined-in-chief by the prosecution to outline  
3 his expertise and that, from that information,  
4 I believed that he fully understood that he was  
5 independent and objective, irrespective of the  
6 fact that he was employed by Fujitsu and was  
7 giving evidence in relation to his employer and  
8 Post Office Limited.
- 9 **Q.** The things you've just spoken about there all  
10 happened once he was in the witness box?
- 11 **A.** I understand that.
- 12 **Q.** The things I've spoken about happen before we  
13 get to the witness box, don't they?
- 14 **A.** Yes.
- 15 **Q.** What was done to ensure the list of things that  
16 I have read out, that all happen before somebody  
17 walks into the witness box, were done?
- 18 **A.** I don't recall. I don't specifically recall  
19 ever seeing Mr Jenkins, although I must have met  
20 him at some point in time, and I believe I may  
21 well have been present when he was in court,  
22 although I can't recall that happening.
- 23 **Q.** If we go forward to paragraph 54 of your witness  
24 statement, please. Thank you. It's the last  
25 line. You say something similar to that which

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- 1 **Q.** -- and that that applied, in this case, in that,  
2 if expert witnesses, such as Mr Gareth Jenkins,  
3 were called, who were not functionally  
4 independent from the Post Office, they were not  
5 akin to conventional experts, who were  
6 accustomed and trained to giving expert  
7 evidence.
- 8 You were under, your team was under  
9 a particular duty to ensure that those  
10 individuals, including Mr Jenkins, understood  
11 the duties to which they were subject?
- 12 **A.** Yes.
- 13 **Q.** You tell us at the beginning of this paragraph  
14 that the guidance given to expert witnesses, was  
15 that they were told that they needed to tell the  
16 truth and, if they weren't, they could be  
17 prosecuted, does it follow that the list of  
18 things that I've just read out were not  
19 undertaken in relation to experts called by or  
20 on behalf of the Post Office in the relevant  
21 period?
- 22 **A.** Yes.
- 23 **Q.** How did that come about, then?
- 24 **A.** Because, at the time, I believed that Gareth  
25 Jenkins understood his duties, that he was

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- 1 you said a moment ago:  
2 "Gareth Jenkins was aware that his duty was  
3 to the court and not to the [Criminal Law Team]  
4 who instructed him or Fujitsu who paid him."
- 5 **A.** Yes.
- 6 **Q.** On what basis do you say that Gareth Jenkins was  
7 aware that his duty was to the court?
- 8 **A.** I believe that he will have understood that from  
9 either the solicitor dealing with him in the  
10 particular case/cases that he was involved or,  
11 indeed, from when he was cross-examined by the  
12 defence or examined-in-chief by the prosecuting  
13 barrister when he was giving evidence.  
14 I believe it will have been explained to him  
15 then and that he would have known on the first  
16 occasion.
- 17 **Q.** Thank you. That can come down.  
18 Was there any Post Office policy guidance or  
19 protocol which reflected any of the principles  
20 which I grouped into five and which I mentioned  
21 a moment ago?
- 22 **A.** No.
- 23 **Q.** Was there, therefore, a complete absence of any  
24 Post Office policy guidance or protocol giving  
25 instructions either to investigators or to

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1 prosecutors as to how to handle expert evidence?  
 2 **A.** Yes.  
 3 **Q.** Can you identify any steps that were taken to  
 4 satisfy the Criminal Law Team that Mr Jenkins  
 5 enjoyed relevant qualifications and expertise?  
 6 **A.** Sorry, can you --  
 7 **Q.** Yes, are you aware of any steps that the  
 8 Criminal Law Team took to satisfy itself or  
 9 themselves, the members of the Criminal Law  
 10 Team, that Mr Jenkins enjoyed the relevant  
 11 qualifications and expertise to give evidence as  
 12 an expert?  
 13 **A.** I believe that his credentials were looked up.  
 14 I may be wrong in saying that I thought he was  
 15 a professor. He certainly had some  
 16 qualifications that appeared to be relevant to  
 17 his position within Fujitsu. I forget whether  
 18 it was a doctorate or some other qualification.  
 19 So my understanding from his qualifications is  
 20 that he appeared to be an expert in his  
 21 particular field.  
 22 **Q.** Are you aware of any steps taken by members of  
 23 the Criminal Law Team to ensure that Mr Jenkins  
 24 was appropriately instructed by provision of  
 25 a relevant and detailed letter of instruction or

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1 *Reefer* duties in terms of the contents of  
 2 an expert report?  
 3 **A.** I don't recall that, no.  
 4 **Q.** Do you remember those requirements which arose  
 5 in a civil case called the *Ikarian Reefer* being  
 6 applied at common law to criminal proceedings?  
 7 **A.** I don't recall.  
 8 **Q.** Do you remember in 2006 the Criminal Procedure  
 9 Rules incorporating them as a matter of law from  
 10 the common law into the Criminal Procedure  
 11 Rules? There are 13 requirements, or so, of  
 12 an expert report?  
 13 **A.** I may have done at the time -- I may have at the  
 14 time but I can't recall now I'm afraid.  
 15 **Q.** You mentioned a moment ago that you would assume  
 16 or believe that, if the report was in any way  
 17 division, that counsel would have pointed it out  
 18 to you?  
 19 **A.** Well, not necessarily prosecution but defence  
 20 counsel, as well, yes.  
 21 **Q.** That's not really how the law operates though,  
 22 is it?  
 23 **A.** No, I --  
 24 **Q.** I think you'll understand.  
 25 **A.** I fully understand that, yes.

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1 terms of reference?  
 2 **A.** I don't know when he was identified as an expert  
 3 witness. That could have been before I took  
 4 over the team but, if it was when I was in the  
 5 team, then that issue was not addressed.  
 6 **Q.** Are you aware of any steps taken by members of  
 7 the Criminal Law Team or by yourself to satisfy  
 8 themselves or yourself that Mr Jenkins had  
 9 understood and thereafter complied with his  
 10 duties as an expert witness?  
 11 **A.** I don't recall.  
 12 **Q.** What steps, if any, were taken to ensure that  
 13 the documents that Mr Jenkins produced and which  
 14 were submitted to the court by way of a witness  
 15 statement, rather than an expert report,  
 16 complied with the requirements at common law  
 17 before 2006 and then by reference to the  
 18 Criminal Procedure Rules from 2006 onwards as to  
 19 the contents of an expert report?  
 20 **A.** I don't know what steps were taken, but  
 21 I believe that -- from his witness statements  
 22 that had he -- had we failed to deal with that  
 23 properly, then counsel would have pointed that  
 24 out to me.  
 25 **Q.** Are you aware of what were called the *Ikarian*

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1 **Q.** That duties imposed by the law by statute or in  
 2 delegated legislation, or another form of legal  
 3 instrument, are imposed on the prosecution and  
 4 one can't delegate that to the defence to pull  
 5 you up?  
 6 **A.** No, I do understand that, yes. It was my  
 7 responsibility.  
 8 **Q.** In your witness statement at paragraph 19,  
 9 I wonder whether we could turn that up, please,  
 10 it's on page 10, this was in answer to  
 11 a question that I think we directly asked you as  
 12 to what independent oversight was exercised in  
 13 respect of the conduct of prosecutions. You  
 14 answered at 19:  
 15 "There was no independent oversight  
 16 exercised in respect of the conduct of  
 17 prosecutions."  
 18 Is that right?  
 19 **A.** Yes.  
 20 **Q.** Does it follow that you wouldn't regard the  
 21 instruction of counsel to prosecute a case as  
 22 a form of independent oversight?  
 23 **A.** I didn't consider counsel in the context of the  
 24 question. I thought you meant some external  
 25 body like the Attorney General's office or the

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1 Crown Prosecution Service.

2 **Q.** Thank you. That can come down. Do you, with me  
3 reformulating the focus of the question, think  
4 that counsel instructed by the Post Office  
5 provided some form of independent oversight in  
6 respect of the conduct of prosecutions?

7 **A.** Yes.

8 **Q.** Who ordinarily settled the indictment in a case  
9 that was committed to the Crown Court?

10 **A.** Counsel. However, the solicitor drafted the  
11 indictment for counsel's consideration and  
12 approval.

13 **Q.** Was there a policy that counsel had to advise on  
14 evidential sufficiency in each case?

15 **A.** Yes.

16 **Q.** Did they, therefore, have to advise in every  
17 case that there was sufficient evidence of  
18 a realistic prospect of a conviction?

19 **A.** Yes.

20 **Q.** Can we just turn up paragraph 33 of your witness  
21 statement, please, which is on page 15. If we  
22 scroll down, thank you. You say:

23 "There were occasions when counsel's advice  
24 was sought prior to a decision to prosecute  
25 being reached. The CLT did not seek advice from

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1 **Q.** That happened occasionally?

2 **A.** That happened occasionally in complex cases. If  
3 we weren't sure of the direction where it was  
4 going, what we needed, if we needed any  
5 assistance, that initial case would go to  
6 counsel. Usually only complex cases.

7 **Q.** Right. That's paragraph 33.

8 **A.** Yeah.

9 **Q.** That can come down. Then, on the other hand,  
10 you're telling us that, in every case, counsel  
11 advised, as a matter of course, post-initiation  
12 of proceedings on whether there was sufficient  
13 evidence to secure a realistic prospect of  
14 a conviction?

15 **A.** Yes.

16 **Q.** So, in all of the cases we're going to look at,  
17 we should find such an advice?

18 **A.** Well, it was not whether there was a realistic  
19 prospect of conviction; it's whether we needed  
20 to get other evidence, whether there were lines  
21 of inquiry that counsel would suggest that we  
22 ought to pursue.

23 **Q.** Ah, right. Well, that's rather different from  
24 what you said a moment ago.

25 **A.** I'm sorry that I've misled you.

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1 external lawyers. Seeking advice from counsel  
2 on certain matters continued throughout my role  
3 in the CLT. Such advice was occasionally sought  
4 in complex [matters]."

5 That was rather different from what you just  
6 said, which was, in all cases, counsel advised  
7 on evidential sufficiency.

8 **A.** Yeah, what I'm saying there is that, in complex  
9 cases, we would ask counsel for their initial  
10 advice prior to drafting charges, but this  
11 paragraph 33 -- so that's paragraph 33. What  
12 I was saying before was once we had charged and  
13 case had been committed to the Crown Court, we  
14 would seek counsel's advice on every case.

15 **Q.** Counsel's advice about what?

16 **A.** The evidence.

17 **Q.** What about the evidence?

18 **A.** Whether it was sufficient, whether we needed to  
19 expand the investigation, lines of inquiry,  
20 anything to do with the up and coming Crown  
21 Court case.

22 **Q.** So have I got this right: there was no policy  
23 that counsel had to advise pre-decision to  
24 charge or decision to initiate a prosecution?

25 **A.** Yeah, only --

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1 **Q.** We've certainly got advices and advice on  
2 evidence where counsel says, "On page 444  
3 there's a reference to Mr So-And-So, he ought to  
4 be traced".

5 **A.** Mm, yeah.

6 **Q.** "On this exhibit, it's got the exhibit reference  
7 SG1, I think that should be SG4, or is there  
8 an SG4?", or something like that.

9 **A.** Yeah --

10 **Q.** Or "We need to bottom this out" or "that out"?

11 **A.** Yes.

12 **Q.** Not in each and every case addressing  
13 fundamentally, or addressing at all, the  
14 question "On the evidence before me, there is or  
15 there is not a realistic prospect of  
16 conviction"?

17 **A.** No, I'm sorry; I misunderstood your question.

18 **Q.** Why wasn't such advice sought?

19 **A.** About the realistic prospect of conviction?

20 **Q.** Correct.

21 **A.** Because I believe that when the case had been  
22 committed for trial, there was sufficient  
23 evidence to afford a realistic prospect of  
24 conviction.

25 **Q.** What duties did you understand counsel to be

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1 subject to after a prosecution had been  
 2 initiated, in reviewing the state of the  
 3 evidence?  
 4 **A.** Well, I think counsel's duties would be to point  
 5 out to us, if there were any failings in the  
 6 evidence, whether the case was robust enough to  
 7 continue within the Crown Court and -- but  
 8 advise on additional evidence, if appropriate.  
 9 **Q.** So, even if they weren't asked to advise on  
 10 whether there was a realistic prospect of  
 11 a conviction, did you understand them to hold  
 12 a professional duty to review the evidence and  
 13 to advise if they considered that the evidential  
 14 test or, indeed, the public interest test had  
 15 not been met?  
 16 **A.** Yes, I'm sure counsel would have done that  
 17 automatically.  
 18 **Q.** Can you recall cases in which that happened?  
 19 **A.** No.  
 20 **Q.** Can we turn to a new topic please. Ah, good.  
 21 I'm told that we can now turn to the hangover  
 22 from this morning. Can we go to POL00031010?  
 23 Ms Price, over the lunch hour, helpfully  
 24 pointed out that there was an additional  
 25 document in the run of policy documents that

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1 **A.** Yes.  
 2 **Q.** -- and, if we just go to the second page, you  
 3 can see that, amongst those who gave assurance  
 4 to the policy, you are named.  
 5 **A.** Yes. It looks to me as though that's a Royal  
 6 Mail, as opposed to Post Office Limited  
 7 document, because of the people who were  
 8 involved, Garth McCarron and Paul Woods and Paul  
 9 Booth, as far as I'm aware, were never in Post  
 10 Office Limited. They were Royal Mail  
 11 Investigators.  
 12 **Q.** So this policy wouldn't apply to the class of  
 13 suspects and defendants that we're here  
 14 considering?  
 15 **A.** No, it wouldn't have.  
 16 **Q.** Can I just, out of completeness, however, draw  
 17 your attention to what 3.3 says on the first  
 18 page. If we scroll down, thank you:  
 19 "Each case will be dealt with on merit and  
 20 action taken (if any) will be in accordance with  
 21 the disciplinary code of the business.  
 22 "Where evidence of a crimes committed by  
 23 a Consignia employee against Consignia or its  
 24 customer is established, the offending employee  
 25 may also be dealt with in accordance with

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1 addressed the issue of who took the decision to  
 2 prosecute subpostmasters and counter clerks that  
 3 I ought to draw to your attention. Can we just  
 4 look at the foot of the first page, please,  
 5 a bit more. Thank you.  
 6 Can you see this is dated June 2002?  
 7 **A.** Yes.  
 8 **Q.** If you look at the top of the page it's  
 9 described as an "Investigation and Prosecution  
 10 Policy". It's purpose is to:  
 11 "... set out the criteria against which  
 12 Consignia investigates crimes and suspect crimes  
 13 committed against the Businesses and also define  
 14 when actions proceed under the criminal law."  
 15 Would this policy apply to the prosecution  
 16 of subpostmasters and counter clerks?  
 17 **A.** Without seeing it all, I'm not sure.  
 18 **Q.** Well, thankfully, it's only a page long. So if  
 19 we can just scroll down slowly and let you read  
 20 it because I don't think you will have seen this  
 21 before.  
 22 **A.** Certainly 3.2, "Reporting Offences", they're all  
 23 Royal Mail offences.  
 24 **Q.** The reason for asking you is that there's  
 25 a sign-off box on the second page --

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1 criminal law. The prosecution guidelines of the  
 2 business will be used in making any decision to  
 3 proceed under criminal law, in consultation with  
 4 SIS [that's the Security and Investigation  
 5 Services] and the Legal Services Criminal Law  
 6 Division where appropriate."  
 7 **A.** Yes.  
 8 **Q.** Does that also indicate that this isn't  
 9 a relevant policy?  
 10 **A.** Yeah, I think what it's saying is it could be  
 11 Parcelforce, it could be Royal Mail but, as  
 12 I say, those three individuals that are named  
 13 were not Post Office Limited Investigators.  
 14 **Q.** In which case, I'm not going to ask you  
 15 questions about where that statement of policy  
 16 may fall short. Can we move on then, please, to  
 17 the issue of guilty pleas.  
 18 **A.** Yes.  
 19 **Q.** The Inquiry is in possession of a large body of  
 20 material which appears to suggest that pleas  
 21 would not be accepted, guilty pleas would not be  
 22 accepted, in cases where the basis of plea  
 23 called into question the integrity of Horizon?  
 24 **A.** Yes.  
 25 **Q.** Does that sound, as a high-level statement,

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1 something with which you were familiar in the  
2 relevant period we're looking at?  
3 **A.** Yes.  
4 **Q.** Can I just look at three examples of that in  
5 action. Can I again start with the Court of  
6 Appeal's decision in *Hamilton*, and I'm using it  
7 because it collects together quite a bit of  
8 material conveniently. POL00113278. It's  
9 page 41, please.

10 Can we look, please, at paragraph 167, which  
11 starts at the foot of the page. The court says:

12 "These factors [that's the factors addressed  
13 in the preceding three paragraphs] are  
14 sufficient for the court to quash Mrs Hall's  
15 conviction on both Grounds 1 and 2. We were  
16 however presented with further information which  
17 bolsters our conclusion that Mrs Hall's  
18 prosecution should not have been brought and  
19 which forms the basis of [the Post Office's]  
20 concession under Ground 2. On 30 June 2011,  
21 [the Post Office's] external solicitor wrote to  
22 [you] recording what had taken place in court  
23 that day, including the basis on which Mrs Hall  
24 had pleaded guilty to fraud as an alternative to  
25 theft. Despite the fact that Mrs Hall had not

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1 "At point 2 the Defence allege that any  
2 discrepancy was as a result of the Horizon  
3 system. There is also a challenge to the  
4 initial missing figure of £18,000 which was  
5 reduced according to the Defence statement in  
6 a matter of minutes. The statement also  
7 maintains that further investigation by the  
8 auditor 'would have discovered the whereabouts  
9 of the alleged missing sum'."

10 Then you say:

11 "Clearly if there were to be a plea to false  
12 accounting but on the basis that the Horizon  
13 system was at fault that would not be  
14 an acceptable basis of plea for the  
15 prosecution."

16 Then the last piece of evidence, please,  
17 POL00069878, and if we look at page 2, please.  
18 This is from a member of your team,  
19 Ms McFarlane, yes?

20 **A.** Yes.

21 **Q.** If we just scroll up, please, to the page above,  
22 so we can just get a date, 1 December 2006.  
23 Yes? Then scroll down, please:

24 "Mandy

25 "Thomas is my Case.

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1 sought to make any express criticism of Horizon  
2 in her defence, the attendance note records the  
3 fact that it was made clear that:

4 "The Prosecution would not accept any  
5 criticism or blame concerning the Horizon  
6 system'.

7 "[The Post Office] accepts that it was  
8 improper to make the acceptability of Mrs Hall's  
9 basis of plea to fraud conditional on not making  
10 any criticism of the Horizon system."

11 Can we look at the second source of  
12 evidence. I'm going to look at all three and  
13 then ask you some questions, please.  
14 POL00055783. This is an exchange of emails with  
15 Dianne Chan, who I think was counsel who  
16 prosecuted cases for the Post Office; is that  
17 right?

18 **A.** Yeah, that's right.

19 **Q.** It's an exchange with you and I think we can  
20 glean what's necessary from the top of this  
21 page. You say to her on 17 November 2010:

22 "Dianne

23 "Have received a defence statement today,  
24 despite the telephone conversation yesterday.

25 A hard copy has been put in the post ...

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1 "He was charged with Theft of [about  
2 £48,000]. He blamed the online banking system  
3 claiming that reports had several transactions  
4 showing NIL transaction. This was looked into  
5 and the investigator remained of the opinion  
6 that the entries were deliberate & to facilitate  
7 fraud. Mr Thomas's expert examined the Horizon  
8 I understand from the officer that he took no  
9 issue with the system and informed the officer  
10 that we would be hearing no more. No Defence  
11 expert report was served.

12 "Following the visit, Mr Thomas's Solicitor  
13 offered a Plea to False Accounting that in doing  
14 so he would not blame Horizon. This was  
15 accepted to avoid the cost of a trial.

16 "... nine months imprisonment. Confiscation  
17 proceedings ..."

18 This is describing a plea negotiation  
19 involving Hughie Thomas, yes?

20 **A.** Yes.

21 **Q.** On the basis that the plea would not involve  
22 blame being directed towards Horizon?

23 Now, you address this practice, plea  
24 negotiations on the basis of Horizon never being  
25 blamed, in your witness statement at page 25.

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1 I wonder whether we could turn that up, please.

2 It's paragraphs 57 to 59. You say:

3 "There are examples in a number of  
4 prosecutions where plea bargains were struck  
5 before trial where the [Post Office] would offer  
6 no evidence on a charge of theft in exchange for  
7 a guilty plea on a charge of false accounting."

8 You give some references.

9 "I did not draft charges [you say in 58] of  
10 theft in order to put pressure on defendants to  
11 offer guilty pleas to charges of false  
12 accounting. Charges of theft were only drafted  
13 when the evidence was such that it was believed  
14 that there was a realistic prospect of  
15 conviction of the offender in relation to the  
16 theft charge.

17 "59. I consider that a plea to false  
18 accounting would not be acceptable if it was put  
19 on the basis that the Horizon IT System was at  
20 fault because I did not believe this was true  
21 and as such felt that such a plea could not be  
22 properly accepted."

23 In your years of operating as a lawyer in  
24 the Criminal Law Team and then as head of it,  
25 had you ever heard of a decision of the Court of  
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1 my colleagues had -- was responsible for. They  
2 were on holiday. My practice, when in charge  
3 of -- being in the Criminal Law Team was that,  
4 if somebody was on holiday, it was  
5 an opportunity for me to undertake work that was  
6 necessary at the time, to see what was going on  
7 on cases. It was one of the measures that  
8 I took, in this particular case, Julian Wilson.  
9 The lawyer had charged both theft and false  
10 accounting.

11 I prepared the instructions for counsel  
12 because the case had been committed for trial  
13 and I dropped the charge of theft, proceeded  
14 with a charge of false accounting and, in the  
15 instructions, I referred counsel to my opinion  
16 that there was -- the evidence in relation to  
17 theft was not -- I can't remember how  
18 I described it, but was not good and that's why  
19 I had drop the theft charge and preferred the  
20 false accounting.

21 Now, I will have taken that up with the  
22 lawyer involved and, at that stage, I would have  
23 probably reminded the team that my instructions  
24 were that you shouldn't charge both theft and  
25 false accounting. You should be pinning your  
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1 Appeal called *Eden*, addressing the Post Office  
2 charging practice of charging counts of theft  
3 and false accounting?

4 **A.** Yes.

5 **Q.** What guidance was issued to prosecutors about  
6 the Court of Appeal's comments about the Post  
7 Office's practice of charging those counts on  
8 an indictment?

9 **A.** The guidance that I gave was that they should  
10 not charge alternative allegations of theft and  
11 false accounting; that they should follow *Eden*.

12 **Q.** Where is that written down?

13 **A.** I wrote it to my team.

14 **Q.** In a guidance document?

15 **A.** No, I noticed that there was a practice amongst  
16 some lawyers of charging both theft -- and with  
17 an alternative of false accounting, which  
18 I disapproved of.

19 **Q.** Why did you disapprove of it?

20 **A.** Well, because it didn't follow *R v Eden*.

21 **Q.** In what respect was it wrong?

22 **A.** Well, it was wrong because *R v Eden* effectively  
23 said you should pin your colours to the mast.  
24 There is a case of *R v Julian Wilson* amongst the  
25 papers, where I took on some papers that one of  
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1 colours to the mast.

2 **Q.** Thank you. Was there anything akin to  
3 a playbook or a rulebook for the Criminal Law  
4 Team?

5 **A.** A playbook?

6 **Q.** Yes, a set of standing instructions as to how  
7 they were to go about their work?

8 **A.** No. But, as the head of the team I received the  
9 post every morning, so I could monitor what was  
10 going on in relation to individual files and, if  
11 I had any concerns about what was going on,  
12 I could sometimes see it with the post. Like  
13 I've just told you about the case that I took  
14 over for somebody who I believe was on holiday  
15 at the time, that was another way I tried to  
16 monitor cases and, if I had any -- and I also  
17 did a random check on committal cases that were  
18 in the legal exec's room, where the cases had  
19 been committed for trial. I did a random check  
20 on a, I don't know, six-monthly basis,  
21 three-monthly basis, I'm not sure what it was.

22 **Q.** Like a dip sample?

23 **A.** Yeah. So I did that sample and, as a result of  
24 those checks, if I felt there was something  
25 amiss, then it would be flagged up to the team.  
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1 And one of my concerns did involve a number of  
2 lawyers charging both theft and false  
3 accounting.

4 **Q.** Did that happen more than once?

5 **A.** Yeah, more than once.

6 **Q.** Why was it happening more than once?

7 **A.** Because people weren't probably listening to me.

8 **Q.** You tell us in paragraph 59 that:

9 "... a plea to false accounting would not be  
10 acceptable if it was put on the basis that the  
11 ... system was at fault because [you] did not  
12 believe [it to be] true."

13 **A.** Yes.

14 **Q.** Was that a belief which you shared with the rest  
15 of the Criminal Law Team?

16 **A.** I will have done, yes.

17 **Q.** Was, therefore, this belief something that was  
18 turned into a policy, applied in a similar  
19 fashion by other prosecuting solicitors under  
20 your supervision?

21 **A.** Not necessarily.

22 **Q.** Do you think some of them accepted pleas to  
23 false accounting on the basis that the Horizon  
24 IT System may be at fault, then?

25 **A.** No. The Code for Crown Prosecutors in 2010, at  
133

1 **Q.** So I don't think there was anything new in the  
2 Code, then?

3 **A.** No, there wasn't but I did double check it  
4 because my understanding was that you would have  
5 a Newton hearing, as you've just said.

6 **Q.** But, by the same token, what was the basis for  
7 your belief that there were no faults with the  
8 IT system, the Horizon IT System, that were  
9 capable of forming a basis of plea or, indeed,  
10 relevant mitigation?

11 **A.** Well, because, at that stage, we'd -- we will  
12 have had a committal bundle which will have had  
13 evidence from Fujitsu, possibly from Gareth  
14 Jenkins himself, effectively saying that the  
15 system is sound.

16 **Q.** So it was the Fujitsu evidence that allowed you  
17 to have the belief that there were no material  
18 faults with the Horizon IT System?

19 **A.** Absolutely, yes.

20 **Q.** By this time, if one picks the period of 2010,  
21 had there been any independent assessment of  
22 Horizon's integrity?

23 **A.** There hadn't been an independent assessment but  
24 Rod -- I've forgotten --

25 **Q.** Ismay?

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1 paragraph 10.4, if I've quoted it right, headed  
2 "Acceptance of Guilty Pleas", is fairly specific  
3 in that it says that, if the prosecution and the  
4 defence disagree in terms of the basis of plea,  
5 then the matter may be referred for the  
6 prosecution to actually call evidence.

7 So my understanding was that it was  
8 perfectly proper to require -- to put our case,  
9 effectively, to the defence, "This is our view",  
10 and, following from that, if I'd not said that  
11 we were challenging what the defence's view was,  
12 then it would be tantamount to me saying, "We  
13 accept there's a problem with Horizon". So --

14 **Q.** Where did your -- I'm sorry.

15 **A.** So I was really following what was in the 2010  
16 Code for Crown Prosecutors at that section.

17 **Q.** What you're referring to there, I think, existed  
18 in practice before then, that if there was  
19 a material dispute as to the basis on which  
20 a person might be sentenced, in some cases it  
21 would be permissible to, essentially, canvas  
22 that with a court but, in others, it would be  
23 necessary for the dispute to form up to a Newton  
24 hearing.

25 **A.** Yes.

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1 **A.** -- rod Ismay had prepared his report, I think it  
2 was in August 2010, which effectively vindicated  
3 the Horizon system.

4 **Q.** Is that how you read the Ismay report: that it  
5 was a vindication of the Horizon system?

6 **A.** Yes.

7 **Q.** Did you regard it as thoroughly independent and  
8 objective?

9 **A.** Yes, it -- yes, I believe it did. As far as  
10 I was concerned, it vindicated the system, yes.

11 **Q.** We're going to come back to Mr Ismay's report  
12 later but he's told the Inquiry that his  
13 instructions, his terms of reference, were to  
14 look for and to include only evidence that  
15 showed that Horizon was a robust system and that  
16 the data that it produced enjoyed reliability  
17 and integrity and not to include anything that  
18 showed otherwise; did you know that?

19 **A.** No.

20 **Q.** That it was a deliberately one-sided effort?

21 **A.** No, I didn't know that at all.

22 **Q.** That the dice were loaded before he even set pen  
23 to paper, because it was a myopic view that only  
24 looked at material to back the system?

25 **A.** No.

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1 Q. You didn't know that?  
 2 A. No. No, I didn't at all. I think --  
 3 Q. He's told us these things from the seat that  
 4 you're sitting in.  
 5 A. Yes. No, had I known that, then I wouldn't have  
 6 given any credence to the -- well, I think I'd  
 7 have asked him "Well, what was wrong with the  
 8 system at the time, then"?  
 9 Q. I think he'd have replied "I'm not allowed to  
 10 look".  
 11 A. Well ...  
 12 Q. Were you relying on Mr Ismay's report after  
 13 August 2010, therefore, in adopting this  
 14 practice of refusing to enter plea negotiations  
 15 if they involved any blaming of the Horizon  
 16 system?  
 17 A. Well, I wasn't refusing to enter plea  
 18 negotiations. What I was saying to the defence  
 19 is, depending on what they said in the defence  
 20 statement, look, our view is contrary to your  
 21 view and that, therefore, this issue may have to  
 22 be resolved by calling evidence.  
 23 Q. Thank you. That can come down. Were you aware,  
 24 by autumn 2010, of the discovery of the receipts  
 25 and payments mismatch bug?

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1 time. Now, looking at it, I should have  
 2 disclosed that issue. I don't think  
 3 I considered that the integrity of Horizon had  
 4 been destroyed by that.

5 The Juliet McFarlane issue we disclosed to  
 6 the defence and I believe it was referred to in  
 7 a generic witness statement that was prepared by  
 8 Fujitsu. And the Jon Longman case, I've  
 9 recently received some papers from you which  
 10 explained what the case was, concerning 40  
 11 offices where there was a problem, and I've been  
 12 able to read that, and I don't know what  
 13 happened with that case.

14 But that, as far as I can understand, was  
 15 a new Horizon issue. So, so far as old Horizon  
 16 was concerned, I didn't have any belief that  
 17 there was a problem (a) because of the Rod Ismay  
 18 report; and (b) because the *Seema Misra* case had  
 19 been comprehensively challenged and we'd secured  
 20 a conviction, and I thought that that supported  
 21 what we were doing.

22 Q. Thank you. We're going to come back to those  
 23 three disclosures of bugs when you return on  
 24 12 December --

25 A. Right.

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1 A. Was that the Juliet McFarlane bug?  
 2 Q. No, I don't think it was, from memory.  
 3 A. Is this the 40 offices?  
 4 Q. I'm sorry?  
 5 A. There were 40 --  
 6 Q. 40 --  
 7 A. -- offices.  
 8 Q. 14.  
 9 A. 14?  
 10 Q. Yes, I think.  
 11 A. No. I was aware of the Juliet McFarlane where  
 12 I think there were two of the -- it was the new  
 13 Horizon problem, I was aware of a Dave Posnett  
 14 single office problem and I was aware of  
 15 Jon Longman's. I don't recall the 14 and  
 16 I don't believe that there are any documents in  
 17 my papers that refer to that one.  
 18 Q. Did the information that you received about the  
 19 problems that you have just identified to us  
 20 affect your faith in the integrity of Horizon?  
 21 A. Horizon, the 2007 problem that Dave Posnett  
 22 referred to, as I recall, was a single office.  
 23 A fix had been implemented the year after and we  
 24 were told in 2009 and I wrongly took the view  
 25 that that needn't be disclosed, I felt at the

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1 Q. -- and some others too --

2 A. Right.

3 Q. -- and whether or the extent to which you knew  
 4 about other bugs when making disclosure  
 5 decisions.

6 A. Right.

7 Q. Can I turn, as you've mentioned it, therefore,  
 8 to the Ismay report. Can we look, please, at  
 9 POL00106867. If we look, please, at page 3 and  
 10 scroll down, please, we can see a message from  
 11 Mr Hayward of 26 February 2010 at 5.01 to  
 12 a range of people, rather senior people, within  
 13 the Post Office, but not including you.

14 A. Yes.

15 Q. You can see that it refers to a conference call  
 16 earlier in the day and I think that's  
 17 a conference call in which you did not  
 18 participate; is that right?

19 A. That's right, yes.

20 Q. It sets out some agreed next steps, can you see  
 21 those listed at 1, 2 and 3?

22 A. Yes.

23 Q. The first one, Mr Hayward and Ms Talbot  
 24 provide Sue Lowther and David King with  
 25 information on past and present cases with

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1 reference to the Horizon challenges, both  
2 criminal and civil cases, and Mr Hayward notes:  
3 "I have asked the fraud team to review  
4 approximately past 2 to 3 years case file  
5 although these challenges are of a more recent  
6 nature."

7 Then paragraph 3:

8 "Subject to ... 2 above, conduct full  
9 investigations into integrity issues with  
10 conclusions/report provided. Once investigated  
11 and conclusions drawn, gain external  
12 verification to give a level of 'external  
13 gravitas' to the responses to these challenges.  
14 (Recommend Ernst & Young as most suitable  
15 partner to complete this ... [to be advised])."

16 Would you agree that this evidences a plan  
17 amongst relatively senior member of the Post  
18 Office team, setting out a plan to investigate  
19 Horizon integrity concerns and challenges?

20 **A.** Yes.

21 **Q.** First, there was going to an investigation  
22 within the Post Office, an internal  
23 investigation, and then an independent review by  
24 sudden consultants, possibly Ernst & Young?

25 **A.** Yes.

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1 **A.** Yes.

2 **Q.** Albeit a month later, I think, you get this  
3 chain because we just saw from the top you get  
4 it in March. He, Mr Hayward, says:

5 "Further to our discussion ... today,  
6 additional information in the attached pdf  
7 article below. As part of the wider review it  
8 may well be worthwhile understanding the  
9 'outcome' of each of the case studies  
10 referenced, where applicable ... and that may  
11 assist in our review."

12 So this was Mr Hayward apparently  
13 circulating an article that covered issues about  
14 Horizon integrity and contained some references  
15 to cases that might need to be included in the  
16 review?

17 **A.** Yes.

18 **Q.** Can we go to POL00106867 and go to the bottom of  
19 the page, please, keep going a little bit more,  
20 thank you. Picking up the chain where we left  
21 it off, you're now added to this chain as  
22 a copy-ee, can you see that?

23 **A.** Yes.

24 **Q.** Mr Posnett says:

25 "All,

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1 **Q.** Would you agree that this apparently suggests  
2 that there was sufficient concern to consider  
3 an investigation to be necessary?

4 **A.** Yes, I imagine it was.

5 **Q.** Would that be, would you agree, because it would  
6 be important for the Post Office as a business,  
7 but also as a prosecutor, actually to appreciate  
8 whether or not there were integrity issues with  
9 Horizon?

10 **A.** Yes.

11 **Q.** That would be important to know to determine  
12 whether future investigations and prosecutions  
13 could be conducted but also whether duties of  
14 disclosure might arise in respect of cases where  
15 convictions had already been obtained?

16 **A.** Yes.

17 **Q.** Did that independent review, to your knowledge,  
18 ever happen?

19 **A.** Not in the time that I was in the Post Office,  
20 no.

21 **Q.** Can we go forwards, please, to POL00054371 and  
22 go to page 2 at the bottom, please. Keep going  
23 a bit more, please. We can see an email an hour  
24 later from Mr Hayward to the same group of  
25 similar people, again not including you?

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1 "Can we please ensure that Rob Wilson (Head  
2 of Criminal Law ...) is kept apprised of the  
3 situation and included in any further meetings  
4 ... on this subject. Our prosecution cases have  
5 faced an increase in challenges as well as our  
6 civil cases, so the activities below, and indeed  
7 going forward, are applicable to both Legal  
8 teams."

9 Would you understand the reference to both  
10 legal teams being the civil in the criminal law  
11 teams?

12 **A.** Yes.

13 **Q.** Thank you. So you're now being included?

14 **A.** Yes.

15 **Q.** Can we go to the top of the page, please. Top  
16 of page 1. We now have your response --

17 **A.** Yes.

18 **Q.** -- on 3 March. So five or so days later.

19 **MR BEER:** Can we deal with that after the break,  
20 please, sir, and take a 15-minute break until  
21 3.15?

22 **SIR WYN WILLIAMS:** Sorry, I was on mute. I said  
23 certainly.

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

25 (3.00 pm)

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1 (A short break)

2 (3.15 pm)

3 **MR BEER:** Good afternoon, sir, can you see and hear

4 me?

5 **SIR WYN WILLIAMS:** Yes.

6 **MR BEER:** Thank you.

7 Mr Wilson, we were looking at POL00106867.

8 Just to remind ourselves of where we are, on the

9 foot of the page, Mr Posnett had copied you in

10 on 1 March to the exchange that had happened on

11 26 February and you replied on 3 March 2010, if

12 we look at the top of the page.

13 Do you know why you weren't involved in this

14 conversation from the outset?

15 **A.** No, I have no idea.

16 **Q.** You were a bit annoyed about that, weren't you?

17 **A.** I certainly was.

18 **Q.** We can see that from the last paragraph of your

19 email, where you say:

20 "Given the nature of the discussions that

21 took place on [26 February] I am staggered I was

22 not invited to take part in the conference."

23 Why were you staggered?

24 **A.** Well, because my team needed to know what was

25 going on and, if there was such a concern within

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1 a problem, we need to do something, however",

2 and then you give a list of half a dozen reasons

3 not to do that, don't you?

4 **A.** Well, within five days of this, I'm being told

5 by Dave King that they're going to do a report,

6 and I'm not saying don't do the report. I think

7 this was just a reaction to having been excluded

8 from what I considered to be very important and,

9 basically, it was me throwing everything onto

10 the page that I probably would have said in

11 a different way had I been in the meeting.

12 **Q.** Are you saying that you can explain away the

13 fact that that this lists, by my reckoning,

14 seven reasons not to commence an independent

15 investigation, the reason for that is pique or

16 anger at not being invited to the meeting?

17 **A.** Yeah, I'm not trying to explain it away, it's

18 just my mindset at that particular time was

19 I need to know if there is a difficulty with

20 Horizon and, yet, there was a meeting that went

21 ahead, I don't know how long it took but, you

22 know, what detail they went into I need to know

23 this.

24 **Q.** But you don't say that?

25 **A.** No, I know I don't say that but what I'm saying

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1 the business, when I needed to know that.

2 **Q.** Why did you need to know it?

3 **A.** Well, because I was responsible for the

4 prosecutions, if I -- you know, if I wasn't

5 aware of what was going on around me, what was

6 I going to do, as a prosecutor? I needed to

7 know that, if there was a problem in the system,

8 what the problem was and, yeah, I was completely

9 staggered.

10 **Q.** Your response, however, isn't to say, "I needed

11 to be included because I need to know, in order

12 for me and my team to discharge our

13 responsibilities"?

14 **A.** No.

15 **Q.** Your response is to give a list of reasons to

16 not do what was proposed?

17 **A.** No. I mean, the first sentence in that response

18 is effectively saying that, if it's thought

19 there's a difficulty with Horizon, then clearly

20 the actions set out in your memo is not only

21 needed but imperative. I mean, that's the

22 response.

23 **Q.** But then the rest of it is a "but", isn't it?

24 The entirety of the page is then a "but",

25 "Clearly, if you think we -- if there's

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1 to you is that my mindset at the time was --

2 I was angry and I have just -- I've acknowledged

3 that, yeah, if there's a problem, there's

4 a problem and we need to deal with that, but,

5 you know, here's some stuff that I might have

6 been saying at the meeting, as I say, not

7 necessarily in that particular way, but I would

8 have obviously been able to listen to what was

9 going on in the meeting, what the concerns were

10 and tailored my answer to that meeting, as

11 opposed to having a blank page because I didn't

12 know what had been going on and throwing

13 everything down.

14 **Q.** Are you tailoring what you say now to try to

15 explain away the contents of this email, trying

16 to explain it away on the basis of anger or

17 frustration?

18 **A.** No, because, like I said before, within five

19 days, I'm contacted by Dave King saying, "We're

20 going to do this exercise", and I don't say,

21 "Well, you can't" or "Don't do it" or whatever,

22 I just say, "Okay".

23 **Q.** But that never happened either, did it? What

24 happened was the Ismay report?

25 **A.** Yeah, I imagine that this moved into the Ismay

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1 report.

2 **Q.** The one sided "Let's look for material that  
3 supports the integrity of Horizon"?

4 **A.** Yeah, I mean, I hear what you say, and I did --

5 **Q.** Well, it was Mr Ismay saying it.

6 **A.** Sorry?

7 **Q.** It was Mr Ismay who actually said it.

8 **A.** No, no, I hear what you're saying now but  
9 I didn't know that it was -- that you would  
10 describe it as a one-sided report.

11 **Q.** You're not saying, overall in this email, "If  
12 there is a basis to investigate the integrity of  
13 Horizon, we should get on and investigate the  
14 integrity of Horizon, this really important",  
15 are you?

16 **A.** Not in so many words, no.

17 **Q.** What you were saying by this email is "The Post  
18 Office will be in serious trouble if we get on  
19 with an independent investigation into the  
20 integrity of Horizon".

21 **A.** Well, not necessarily. It depends what the  
22 independent report was going to say.

23 **Q.** No, you say that there were a whole bunch of  
24 reasons not even to look, don't you? You come  
25 up with a list of reasons -- we're going to go

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1 or another.

2 **Q.** Let's look at the reasons that you give, second  
3 line. You say:

4 "The consequence ... will be that to  
5 commence or continue to proceed with any  
6 criminal proceedings will be inappropriate."  
7 That's reason 1, yes?

8 **A.** Yeah.

9 **Q.** So, if we start in investigation, looking at the  
10 integrity of the data we rely on, we cannot  
11 continue with any criminal proceedings.

12 **A.** Yeah.

13 **Q.** Was that an overstatement?

14 **A.** Yeah, probably.

15 **Q.** Why did you make an overstatement?

16 **A.** I think I just wanted to impress on these people  
17 that, if there was issues going on, I needed to  
18 know what they were.

19 **Q.** You say:

20 "My understanding is that the integrity of  
21 Horizon data is sound and it is as a result of  
22 this that persistent challenges that have been  
23 made in court have always failed."  
24 Now, at this time, you obviously don't  
25 benefit from the wisdom of Mr Ismay's report.

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1 through each of them -- not even to start  
2 an investigation?

3 **A.** Yes, okay, I accept that, but that was my --  
4 that wasn't my intention. I think that  
5 I overreacted to being excluded from what I saw  
6 as being critical to me as the Head of the  
7 Criminal Law Team.

8 **Q.** Did you speak to anyone directly before writing  
9 this email or afterwards?

10 **A.** I don't think so no.

11 **Q.** Did you speak with John Scott or Andrew Hayward  
12 about it?

13 **A.** I don't think so. I didn't have a great of  
14 dealings with John Scott and I'm not sure I knew  
15 who Andy Hayward was.

16 **Q.** If there was a sufficient level of concern  
17 amongst senior members of Post Office staff  
18 about the integrity of Horizon, wasn't the right  
19 thing to do to conduct a full Inquiry as  
20 an imperative, full stop?

21 **A.** Yes.

22 **Q.** Doesn't it appear that that had been the plan of  
23 senior members of the Post Office right up until  
24 your input?

25 **A.** I'm sure my input didn't dissuade them one way

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1 What were you referring to there, that your  
2 understanding is that the integrity of Horizon  
3 data is sound?

4 **A.** Based on the prosecutions that had been  
5 successful.

6 **Q.** In how many of those had a question been raised  
7 as to the integrity of Horizon data?

8 **A.** I can't remember. But, you know, I guess  
9 a number.

10 **Q.** Were the vast majority of them guilty pleas?

11 **A.** I think they ended up as guilty pleas, yes.

12 **Q.** What do you mean by that?

13 **A.** Well, I think we had a number of cases where we  
14 were facing trial and the defence decided to  
15 plead guilty at the last moment.

16 **Q.** Often to false accounting?

17 **A.** Yes.

18 **Q.** On the dropping of the theft charge?

19 **A.** No -- well, in the papers there are, I think,  
20 seven references to my charging of offences:  
21 three were for theft on their own; three were  
22 for fraud on their own; and one was in relation  
23 to a theft and a fraud, albeit in the advice  
24 letter I say that the theft and the fraud are  
25 not alternatives.

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1 So I was not charging false accounting and  
 2 a theft or a Fraud Act offence as alternatives.  
 3 I tried to avoid doing that at every  
 4 opportunity.

5 **Q.** You continue:  
 6 "These challenges are not new and have been  
 7 with us since the inception of Horizon as it has  
 8 been the only way that Defendants are left to  
 9 challenge our evidence when they have stolen  
 10 money or where they need to show that our  
 11 figures are not correct."

12 **A.** Mm.

13 **Q.** What you're saying by that is "What's new here?  
 14 They're all guilty of theft, they're just coming  
 15 up with this as an excuse, blaming Horizon",  
 16 aren't you?

17 **A.** No, I wouldn't interpret it in that way. I'm --  
 18 what I'm saying --

19 **Q.** What are you saying by "the only way that  
 20 defendants are left to challenge our evidence  
 21 when they've stolen money"?

22 **A.** Well, that's if they're a thief.

23 **Q.** You're not saying that at all, are you? You're  
 24 saying that the challenges made to Horizon are  
 25 a figment of guilty thieves' imagination and  
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1 when they've stolen the money is to blame  
 2 Horizon"?

3 **A.** Well, like I say, hear what you say.

4 **Q.** Well, what do you mean by you hear what I say?  
 5 I'm reading out some words in black and white to  
 6 you --

7 **A.** Yeah, I know.

8 **Q.** -- and you're saying they don't mean what I'm  
 9 suggesting. Please tell us what they do mean.

10 **A.** Well, when I wrote that email, I was annoyed and  
 11 I think that's -- what I've put in there went  
 12 over the top and, had I been in the meeting on  
 13 the day, I hope that I would have been a lot  
 14 more constructive in terms of what I contributed  
 15 towards the meeting.

16 **Q.** Okay, so that's the second reason. The first  
 17 reason is we'll have to stop all criminal  
 18 proceedings; the second reason is but these  
 19 challenges have been around since time  
 20 immemorial.

21 Can we turn, please, to the next paragraph:  
 22 "What is being suggested is that an internal  
 23 investigation is conducted. Such  
 24 an investigation will be disclosable as  
 25 undermining evidence on the defence in the cases  
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1 it's the only thing they can come up with when  
 2 they know they're guilty and they've stolen the  
 3 money. That's what you're saying by that  
 4 sentence, isn't it?

5 **A.** Well -- well, I don't view it in that way but  
 6 I can see why you do, yes.

7 **Q.** Can you explain to us what it does mean, then?

8 **A.** Well, we had, right from the inception of  
 9 Horizon, experienced defendants saying "It  
 10 wasn't me; it was the system", yet they plead  
 11 guilty, and that's part of something that  
 12 I couldn't understand: why somebody who was  
 13 saying, "I'm effectively innocent" would ever  
 14 plead guilty.

15 **Q.** Have you ever thought of the possibility that  
 16 people did so in order to get a shorter term of  
 17 imprisonment or a suspended sentence --

18 **A.** Well --

19 **Q.** -- being of good character, quite often being  
 20 trusted Post Office employees?

21 **A.** I have to say that my mentality would be that,  
 22 if I was prosecuted for theft and I was not  
 23 dishonest, I would not admit it.

24 **Q.** So, again, this doesn't mean, the sentence "The  
 25 only way they're left to challenge our evidence  
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1 proceeding through the criminal courts."  
 2 Why would it be undermining?

3 **A.** Well, it would be undermining on the basis  
 4 that -- if it reveals that there was anything  
 5 wrong with the system.

6 **Q.** Well, it doesn't say that, does it? Your  
 7 understanding was that Horizon data was sound  
 8 and that all past challenges had failed. What  
 9 you're saying here is that the fact of  
 10 an investigation will be disclosable as  
 11 undermining the defence.

12 **A.** Yeah.

13 **Q.** Why would the fact of an investigation be  
 14 disclosable as undermining evidence?

15 **A.** Well, it wouldn't be, you know, it's something  
 16 that I put in that's erroneous.

17 **Q.** So that's the third reason. If we continue:  
 18 "Inevitably the defence will argue that if  
 19 we are carrying out an investigation we clearly  
 20 do not have confidence in Horizon and therefore  
 21 to continue to prosecute will be an abuse of the  
 22 criminal process."  
 23 That's the fourth reason.

24 **A.** Yeah.

25 **Q.** Does that involve a very significant  
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1 overstatement too?

2 **A.** Well, I mean if -- yes, probably. Yes.

3 **Q.** "Alternatively we could be asked to stay the  
4 proceedings pending the outcome of the  
5 investigation, if this were to be adopted the  
6 resultant adverse publicity could lead to  
7 massive difficulties for [the Post Office] as it  
8 would be seen by the press and media to  
9 vindicate the current challenges."  
10 That seems like a more moderate possibility,  
11 doesn't it? If you're conducting  
12 an investigation into the integrity of your  
13 data, a defendant who is affected by that data  
14 may say, "Stop the prosecution for the moment,  
15 adjourn the proceedings".

16 **A.** Yes.

17 **Q.** Yes?

18 **A.** Yes.

19 **Q.** But you give it, as a fourth or a fifth reason  
20 here, "It will adversely affect the Post Office  
21 in the media".

22 **A.** Yes.

23 **Q.** When you're weighing up, on the one hand,  
24 whether to conduct an investigation into  
25 concerns about the integrity of data that's used

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1 data integrity problems" lead to that kind of  
2 untold damage?

3 **A.** Yes.

4 **Q.** So why have you written this in this way? If  
5 you didn't think there was anything at all wrong  
6 with Horizon, why would untold damage be caused?

7 **A.** I really go back to what I was saying to explain  
8 everything, apart from the first sentence, in  
9 that I hadn't been included in the meeting,  
10 I was annoyed and I reacted to that. And I just  
11 wanted to put everything on paper which may or  
12 may not have been discussed in the meeting,  
13 I didn't know. And, yes, it was an  
14 overreaction, I accept that.

15 **Q.** You continue:

16 "Our only real alternative to avoid the  
17 adverse publicity will be to offer no evidence  
18 on each of our criminal cases. This should  
19 mitigate some adverse publicity but is not  
20 a total guarantee."

21 That's, essentially, a, repetition of  
22 a point earlier.

23 **A.** Yes.

24 **Q.** "To continue prosecuting alleged offenders  
25 knowing there is an ongoing investigation to

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1 to prosecute people in the criminal courts and  
2 potentially send them to prison and, on the  
3 other hand, some negative press, which wins the  
4 day?

5 **A.** The first.

6 **Q.** You continue:

7 "The potential impact however is much wider  
8 for [the Post Office] in that every office in  
9 the country will be seen to be operating  
10 a combined system with untold damage to the  
11 Business."  
12 Doesn't that and the sentence right at the  
13 beginning of this paragraph, "Such  
14 an investigation will be disclosable as  
15 undermining evidence", suggest that you thought,  
16 as well, "Hold on, there might be some system  
17 integrity problems here"?

18 **A.** I never thought that, no.

19 **Q.** Why would an investigation, or an investigation  
20 which resulted in a conclusion that the Horizon  
21 system enjoyed complete integrity, be seen as  
22 the Post Office operating a compromised system  
23 in every office in the country.

24 **A.** Well, it wouldn't.

25 **Q.** Would only a report that said, "No, there are

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1 determine the veracity of Horizon could ... be  
2 detrimental to the reputation of my team."

3 This is, I think, the sixth reason you give  
4 for not doing it:

5 "If we were to secure convictions in the  
6 knowledge that there was an investigation where  
7 the investigation established a difficulty with  
8 the system we would be open to criticism and  
9 appeal to the Court of Appeal. The Court of  
10 Appeal will inevitably be highly critical of any  
11 prosecutor's decision to proceed against  
12 Defendants in the knowledge that there could be  
13 an issue with the evidence."  
14 Isn't the problem with from that that you  
15 knew from the exchange that it was proposed to  
16 be an investigation, which is to establish  
17 whether or not there was a difficulty with the  
18 system, and you were nonetheless proposing to  
19 proceed with prosecutions?

20 **A.** Yes.

21 **Q.** You say:

22 "What we really need to do is impress on  
23 Fujitsu the importance of fully cooperating in  
24 the provision of technical expertise and witness  
25 statements to support the criminal and civil

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1 litigation now and in the future."

2 So were you saying here, "All we need to do  
3 is for Fujitsu to stand up and continue to back  
4 their system by providing us with their evidence  
5 in court that the evidence is sound"?

6 **A.** No, I wasn't suggesting that, if it wasn't  
7 sound, that they should lie. What I was  
8 suggesting was that, you know, as a matter of  
9 course, we should be getting the full  
10 cooperation of Fujitsu on each and every  
11 prosecution and civil case.

12 **Q.** Were they not fully cooperating?

13 **A.** Well, I think there were tensions between  
14 Fujitsu and POL, which certainly came out in the  
15 *Misra* case, in terms of apparently not wanting  
16 experts to talk to other experts.

17 **Q.** That hadn't happened yet.

18 **A.** No, but, I mean, I think --

19 **Q.** That was later in the year?

20 **A.** Was it? Okay.

21 **Q.** Yeah, we're March, I think.

22 **A.** Well, I just have an impression that there were  
23 tensions between Fujitsu and then the dealing  
24 with POL or the investigators, or wherever it  
25 was.

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1 not only needed but is imperative" -- that, for  
2 me, is the crucial bit.

3 **Q.** That's where the email should have ended,  
4 shouldn't it?

5 **A.** Absolutely, yeah.

6 **Q.** Would you really say all of these things, with  
7 these overstatements and gross overstatements,  
8 as we've agreed them to be, were because you  
9 were fed up that you hadn't been invited to  
10 a meeting?

11 **A.** No, I think it wasn't that I was fed up that  
12 I hadn't been invite to a meeting. What the  
13 problem was was, if they're hide -- well, not  
14 hiding this but, if they're not including me in  
15 something like this, then that's pretty crucial  
16 to me and my team, me particularly, running the  
17 criminal prosecutions.

18 I need to know if there's a problem. You  
19 know, I need to know immediately if there's  
20 a problem and, clearly, whatever had generated  
21 the meeting must have generated it some time  
22 before, and so I'm being kept in the dark, and  
23 that's what was rankling me, in relation to  
24 this.

25 **Q.** Did you take it up beyond the sending of this

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1 **Q.** Isn't this you really proposing an alternative  
2 to an independent investigation that actually  
3 looks objectively at whether there was anything  
4 to the challenges or nothing to the challenges,  
5 "Let's shut this down by getting Fujitsu to back  
6 their system"?

7 **A.** I never believed that I was senior enough to be  
8 able to do anything like that in any event.  
9 I mean, I thought that there was no problem in  
10 relation to the Fujitsu evidence or Horizon and,  
11 as I keep saying, that I think this was me going  
12 over the top, because I was annoyed that I had  
13 not been included in the initial meeting.

14 **Q.** I take it you regret deeply sending this email  
15 now?

16 **A.** Obviously.

17 **Q.** Because, on its face, it reads like an attempt  
18 to shut down --

19 **A.** Yeah.

20 **Q.** -- the commencement of an independent  
21 investigation into the integrity of Horizon,  
22 doesn't it?

23 **A.** All I can say is the first sentence -- "If it is  
24 thought that there is a difficulty with Horizon  
25 then clearly the action set out in your memo is

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1 email?

2 **A.** Well, as I said earlier, five days later, Dave  
3 King emails me saying, "We're going to do this,  
4 we're going to have an internal inquiry", and  
5 I think I ask him about a question about what  
6 does -- I think there was mentioned information  
7 security or something on that line. I asked  
8 "What did that mean?" And I didn't, sort of  
9 say, "Don't do it. You know, I've already  
10 advised don't do it". I just said, "Thank you  
11 very much".

12 **Q.** What happened to that internal inquiry?

13 **A.** I believe that was the Rod Ismay inquiry.

14 **Q.** Can we turn, please, to POL00120479. Just look  
15 at the top of the page, please. We're just  
16 before the final Ismay report comes out on  
17 2 August and he's circulating a draft report,  
18 including to you; can you see that?

19 **A.** Yes.

20 **Q.** Why were you being included as somebody who  
21 could give comments on the draft report?

22 **A.** I don't know, presumably because I kicked up  
23 a fuss. They were keeping me in the loop.

24 **Q.** So the proposal that had been initially for  
25 an independent investigation had morphed into

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1 what became the Ismay report?  
 2 **A.** It looks like it, yes.  
 3 **Q.** When did you first know that the Ismay report  
 4 was being undertaken, investigating the  
 5 integrity of Horizon?  
 6 **A.** I don't know.  
 7 **Q.** Well, when you did find out, did you say, "Hold  
 8 on, we're investigating the integrity of  
 9 Horizon. The consequence of that will be we  
 10 must stop prosecuting every case"?  
 11 **A.** No.  
 12 **Q.** Did you say, "Defendants will argue that the  
 13 proceedings against them are an abuse of  
 14 process"?  
 15 **A.** No.  
 16 **Q.** Did you say, "The consequence of us  
 17 investigating the integrity of Horizon will be  
 18 that they will ask to stay the proceedings  
 19 pending the outcome of the investigation"?  
 20 **A.** No.  
 21 **Q.** Did you say that "The Court of Appeal may be  
 22 critical and it will be detrimental to the  
 23 reputation of my team if we continue to  
 24 prosecute cases whilst there is an investigation  
 25 into the integrity of Horizon"?

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1 Was that the prevailing ethic amongst the  
 2 senior leadership of the Post Office at this  
 3 time: the priority was to close down issues that  
 4 were newsworthy?  
 5 **A.** Well, if you're telling me that Rod Ismay was  
 6 told not to report on anything that was  
 7 detrimental, then he probably was.  
 8 **Q.** Did you provide any additional input with the  
 9 aim of closing down issues that caused the media  
 10 to consider this to be newsworthy?  
 11 **A.** I don't recall giving any input to his report.  
 12 It may have been that I supplied some statistics  
 13 in terms of numbers, but I recollect -- my  
 14 recollection is that I received the report and  
 15 that was it. I didn't contribute to it in any  
 16 way. Now, I don't know what Rod Ismay would say  
 17 my contribution was but I can't recall one.  
 18 **Q.** Well, he said that the list of people to whom it  
 19 was distributed, he couldn't explain why, in  
 20 relation to a lot of them, it was distributed to  
 21 them.  
 22 **A.** Yeah.  
 23 **Q.** Can we turn then to the report itself,  
 24 POL00026572. We can see it is dated 2 August  
 25 and you're one of the addressees?

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1 **A.** No.  
 2 **Q.** All of the reasons that you gave in your 3 March  
 3 document applied equally to a different species  
 4 of investigation into the integrity of Horizon,  
 5 didn't they?  
 6 **A.** Yes.  
 7 **Q.** The Ismay report would fall to be disclosed in  
 8 future criminal proceedings?  
 9 **A.** Yes, only it, in my eyes, vindicated the Horizon  
 10 system.  
 11 **Q.** Let's look at what Mr Ismay is telling this  
 12 audience Post Office's priorities are. First  
 13 paragraph: here's the latest version, it's  
 14 a complex area, I'd value further comments.  
 15 Then he gives some timing.  
 16 Paragraph 3:  
 17 "Regardless of how this document is  
 18 finalised, there are [some] improvement points  
 19 which we will need to work on together ..."  
 20 Then this, "The priority":  
 21 "The priority should probably be to provide  
 22 any input considered appropriate for closing  
 23 down the issues that cause Channel 4 to consider  
 24 this a news item. Also to ensure that we are  
 25 prepared for the next court cases."

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1 **A.** Yes.  
 2 **Q.** If we scroll down on the first page, please.  
 3 The first paragraph of -- sorry, the paragraph  
 4 above "Executive Summary":  
 5 "This paper has been compiled as  
 6 an objective, internal review of POL's processes  
 7 and controls around branch accounting."  
 8 Mr Ismay told us that that sentence was  
 9 incorrect. It wasn't objective at all; it was  
 10 a one-sided picture, which didn't look at any  
 11 evidence that there may be problems with  
 12 Horizon. It only collected together existing  
 13 accounts of how reliable Horizon was. He  
 14 continues under his "Executive Summary":  
 15 "The allegations to which we are responding  
 16 follow on from cases where thousands of pounds  
 17 were missing at audit. We remain satisfied that  
 18 this money was missing due to theft in the  
 19 branch -- we do not believe the account balances  
 20 against which the audits were conducted were  
 21 corrupt."  
 22 Is that the headline that you took from  
 23 this?  
 24 **A.** Yes, I think -- yeah, one of the headlines, yes.  
 25 **Q.** Can we go forward to page 19, please. Scroll

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1 down, please. Here he addresses the possibility  
2 of independent review or independent audit and  
3 he says:

4 "[The Post Office] has actively considered  
5 the merits of an independent review. This has  
6 been purely from the perspective that we believe  
7 in Horizon but that a review could help give  
8 others the same confidence that we have.

9 "Our decision between IT, Legal, [Product &  
10 Branch Accounting], Security and Press Office  
11 has continued to be that no matter what opinions  
12 we obtain, people will still ask 'what if' and  
13 the defence will always ask questions that  
14 require answers beyond the report."

15 Just stopping there, were you party to  
16 a decision, as a representative of Legal, that  
17 included that amongst its reasoning?

18 **A.** I don't think so. As I said so before, I can't  
19 recall having any input to this document. A lot  
20 of the information in it I wouldn't have been  
21 privy to, with the exception of possibly the  
22 case numbers.

23 **Q.** But this isn't about a conclusion that's  
24 reached; this is explaining why we haven't gone  
25 to an independent reviewer or auditor and it's

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1 "It would also beg a question for the Court  
2 of Appeal over past prosecutions and  
3 imprisonments."

4 That's not something that you raised in your  
5 email, was it?

6 **A.** I don't recollect raising it, no.

7 **Q.** Do you know where that came from, which sounds  
8 like something that a lawyer might advise, "if  
9 we get an independent review, you should be  
10 aware that it might call into question all of  
11 the convictions of the subpostmasters that we've  
12 obtained over the years"?

13 **A.** Yeah, I think that I remember speaking to Dave  
14 King, who I think was part of the group that --  
15 involved with this -- involved this report. So  
16 it may have come from me to Dave King but  
17 I don't ever recall speaking directly to Rod  
18 Ismay.

19 **Q.** Can we, shortly before we break for the day,  
20 turn lastly to POL00105593. This is a new  
21 document that we haven't looked at before,  
22 I think. It's dated 28 March 2012. So we're  
23 a year and a half on. It's an email exchange  
24 between Chris Darvill and Susan Crichton. If we  
25 scroll down to the foot of the page, please, we

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1 suggesting that amongst those that were party to  
2 a decision not to do so was Legal. Was that  
3 you?

4 **A.** I don't recall ever having had dealings with Rod  
5 Ismay on the phone or in meetings. I don't  
6 think I ever met him and I didn't recognise the  
7 name when it first came up. I don't think it  
8 was me, no.

9 **Q.** We'll skip over the next couple of paragraphs,  
10 please, and go to the next page. He then says:

11 "It is also important to be crystal clear  
12 about any review if one were commissioned -- any  
13 investigation would need to be disclosed in  
14 court. Although we would be doing the review to  
15 comfort others, any perception that the Post  
16 Office doubts its own systems would mean that  
17 all criminal prosecutions would have to be  
18 stayed. It would also beg a question for the  
19 Court of Appeal over past prosecutions and  
20 imprisonments."

21 The first two sentences of that paragraph  
22 are essentially what you were saying in your  
23 March email, aren't they?

24 **A.** Yes.

25 **Q.** The last sentence:

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1 can see who Chris Darvill was. Is that a name  
2 that's familiar to you?

3 **A.** No.

4 **Q.** Looking at his designation and the address  
5 given, and bearing in mind this is March 2012,  
6 where do you think Mr Darvill sat within the  
7 Legal Services offering of the Post Office?

8 **A.** I think he was in the Post Office Limited team,  
9 solicitors team.

10 **Q.** So that's, what, neither the Criminal Law Team  
11 nor the civil law team --

12 **A.** Yeah, but --

13 **Q.** -- but something else?

14 **A.** Something else, yes.

15 **Q.** If we go up, please, he says under the heading  
16 "Comments from Rob Wilson":

17 "Susan

18 "The earliest Rob can speak to me is 3 pm.  
19 (I have told him that you are meeting with Alice  
20 [I think probably Alice Parsons] at 3.30 pm).  
21 He has, however, sent over a few initial  
22 comments ..."

23 Just scroll up. We will see when we look at  
24 the whole context here that this appears to be  
25 another exchange about commissioning

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1 an independent audit in 2012. Mr Darvill says  
2 that you have:

3 "... concerns regarding the [public  
4 relations] implications over an audit being  
5 conducted. I guess the point here is carrying  
6 out an audit in response to the 'noise'  
7 surrounding the integrity of the Horizon system  
8 potentially looks reactive and will be seen as  
9 [the Post Office] having lost confidence in the  
10 system.

11 "Rob also has concerns regarding the costs  
12 that would be incurred in carrying out an audit.  
13 Depending on the scope of the audit, the costs  
14 could potentially be significant.

15 "An audit commissioned by [the Post Office]  
16 may not have the desired effect of curbing these  
17 challenges in any event. It will always be said  
18 that the audit was not independent. Ultimately  
19 the only way to avoid criticism would be to  
20 appoint a joint expert.

21 "Rob does not believe an audit would have  
22 a great impact on current prosecutions in the  
23 sense of finding a 'smoking gun' which explains  
24 that the losses were due to computer error, but  
25 if [the Post Office] is required to disclose

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1 deflect the defence from continuing to say they  
2 had problems with Horizon. I imagined that  
3 there would still be challenges in relation to  
4 the Horizon system.

5 **Q.** The views that you're recorded as giving here,  
6 do you doubt that you gave them in any way? We  
7 haven't tracked down a communication from you to  
8 Mr Darvill.

9 **A.** No, I've no reason to suspect that he's got it  
10 wrong. I mean, he may have emphasised it --  
11 I may have emphasised it in a slightly different  
12 way but I think, essentially, I was saying  
13 "Look, we -- from my perspective, the system has  
14 been vindicated by a report. If you want to do  
15 another report that's internal, you're wasting  
16 your time, basically. If you want to do  
17 an external report, well, that may be  
18 a different matter". But --

19 **Q.** This was about an external audit --

20 **A.** Right, okay.

21 **Q.** -- because I think it talks about the costs?

22 **A.** Yeah. So, you know, in the end of the day it's  
23 going to be your decision. I'm staying in Royal  
24 Mail, you're going -- you're in POL. You know,  
25 you're going to have to decide. But, as far as

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1 that an expert has been appointed to conduct  
2 a review there would be a strong argument that  
3 the cases should be adjourned pending the  
4 outcome of the review. I will need to test with  
5 Rob the extent to which this would need to be  
6 disclosed.

7 "Rob remains firmly of the view that  
8 an audit should not be carried out. In his  
9 words: 'POL has to grit its teeth and get on  
10 with prosecuting and defending civil actions'."

11 Was it your view that POL should just grit  
12 its teeth and get on with prosecuting people?

13 **A.** I think so, yes.

14 **Q.** Just carry on regardless?

15 **A.** Well --

16 **Q.** More important than whether or not there was  
17 a problem with the system was public relations  
18 and cost?

19 **A.** Well, I didn't believe that we had a problem  
20 with the system because of the Rod Ismay report  
21 and, by this time, we'd had the *Seema Misra* case  
22 which had been fully challenged.

23 **Q.** Did you regard that as a resounding success?

24 **A.** Well, I didn't regard it in the same way as  
25 Mr Singh, no. I didn't think it was going to

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1 my view is concerned at the current time, is  
2 that we've already had a report and it's  
3 vindicated us.

4 **Q.** The Ismay report. So it all stacks -- all of  
5 this hinged on Ismay, did it?

6 **A.** Well, yes, but I didn't know that -- what you've  
7 told me this afternoon. I never understood that  
8 that was the position. If I'd realised that  
9 that was the position, then it would be  
10 completely different.

11 **MR BEER:** Thank you very much, they're the only  
12 questions I ask you presently until December.

13 Sir, I understand that none of the Core  
14 Participants are going to ask --

15 Oh, in fact, my apologies. Mr Jacobs is  
16 going to ask some questions. My mistake.

**Questioned by MR JACOBS**

18 **MR JACOBS:** Sir, just a quick question from me.

19 I want to ask you about paragraph 18 of your  
20 statement. I represent 157 subpostmasters and  
21 I am instructed by Howe+Co. So if we go to  
22 page 10 of 36 and that's WITN04210100, page 10.  
23 What you say there is:

24 "In the event that the defendant was  
25 acquitted following trial I would contact

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1 prosecuting council and ask for a full report  
2 with a view to understanding the reason for the  
3 acquittal."

4 One of our clients is Suzanne Palmer. She  
5 was acquitted by jury after a three-day trial,  
6 in relation to three counts of false accounting,  
7 that was in January 2007. The jury accepted  
8 that she had not acted dishonestly and accepted  
9 what she said about the problems in the system.

10 What I want to ask you is what it was that  
11 you were trying to understand after  
12 an acquittal. Did acquittals, such as this one  
13 and others, cause you to think that maybe there  
14 was something in what the subpostmasters were  
15 saying about the Horizon system and that at  
16 least there should be an investigation?

17 **A.** Yes, if counsel had said to me "Yes, I do have  
18 concerns over the Horizon system", then yes.  
19 Sorry, but I -- apologies, but I can't recall  
20 the case and I can't recall what counsel said in  
21 relation to the acquittal. But, yeah, I mean  
22 I think had counsel said to me "Look, Rob, we  
23 have a serious problem here", then, yes, I would  
24 have done something about it.

25 **Q.** But if the fact that a jury had rejected what  
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1 it right next time?

2 **A.** No.

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

4 **A.** No, no, it wasn't. No. It was a genuine  
5 request for information to understand what had  
6 gone on, not to strengthen our case in the  
7 future, no.

8 **Q.** So, finally, you didn't think, then, did you  
9 that an acquittal is a significant event that  
10 ought to have at least caused some sort of  
11 internal inquiry or investigation?

12 **A.** Well, no -- well, it did, in the sense of  
13 requesting a report from counsel and, had  
14 counsel expressed any reservations, I would have  
15 obtained a transcript of the trial and that  
16 would have been examined. I do recall, during  
17 the course of my period as the team leader,  
18 requesting transcripts -- not very often but  
19 I do recall doing that -- because I wanted to  
20 find out whatever it was that I needed to find  
21 out.

22 **MR JACOBS:** Thank you. I haven't any further  
23 questions for you.

24 **THE WITNESS:** Thank you.

25 **SIR WYN WILLIAMS:** Mr Beer, Mr Wilson is returning  
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1 the Post Office was saying about the honesty and  
2 integrity of a person who was appointed because  
3 they're a person of good standing in their  
4 community, if a jury had rejected that there  
5 could possibly be an integrity issue with the  
6 Horizon system, surely that ought to have caused  
7 you to have paused and it should have been  
8 an alarm bell, regardless of what counsel said?

9 **A.** Well, I don't know why the jury acquitted your  
10 client.

11 **Q.** Right. Now, it seems to our clients,  
12 particularly in light of the passage that  
13 Mr Beer took you to, when you say "These  
14 challenges are not new. They've been with us  
15 since the inception of Horizon. It's always  
16 been the only way the defendants are left to  
17 challenge our evidence when they've stolen money  
18 or when they need to show our figures are not  
19 correct", it seems that your view, and the view  
20 of Post Office, were entrenched and, when you  
21 say in your statement that you tried to  
22 understand the reasons for an acquittal, what  
23 you were really doing was looking to see what  
24 you could do in future to make sure that didn't  
25 happen again and secure more convictions to get  
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1 in December. With other witnesses who have had  
2 such a long delay between their tranches of  
3 evidence, I have released them from the  
4 prohibition on them talking about the evidence  
5 generally, as far as I recall, ie I haven't said  
6 anything along the lines of "You mustn't discuss  
7 the evidence which you have already given", or  
8 anything like that.

9 In this case, I don't see any reason to  
10 depart from that general practice but I'd be  
11 grateful if you or anybody else has any  
12 observations about that.

13 **MR BEER:** Thank you, sir. No, there's no reason to  
14 depart from what you've just said and every  
15 reason to do it. In particular, because  
16 Mr Wilson has got to write his second witness  
17 statement and may require the assistance of his  
18 lawyers to do that.

19 **SIR WYN WILLIAMS:** Yes. Nobody else is shaking  
20 their head vigorously saying we've got it wrong,  
21 are they?

22 **MR BEER:** No, they're not, sir.

23 **SIR WYN WILLIAMS:** Right.

24 Well, Mr Wilson, thank you for giving  
25 evidence during the course of today and you are  
180

1 now able to speak about your evidence with your  
 2 lawyers or, for that matter, anyone else but you  
 3 appreciate that you will be required to return  
 4 on a date in December to give further evidence?

5 **THE WITNESS:** Yes, I do, sir. There's nobody else  
 6 that I could really speak to.

7 **SIR WYN WILLIAMS:** Fine. Well, you don't have to  
 8 offer an explanation but thank you anyway.

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

10 **MR BEER:** Sir, we return tomorrow at, I think,  
 11 10.00 am for Paul Inwood and Thomas Pegler.

12 **SIR WYN WILLIAMS:** Yes. Thank you very much,  
 13 Mr Beer.

14 I will see everyone in the morning.

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

16 (4.09 pm)

17 (The hearing adjourned until 10.00 am  
 18 the following day)

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 20  
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 22  
 23  
 24  
 25

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