

Tuesday, 17 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:** Thank you very much, can I call  
7 Mr Breeden, please.  
8 **JOHN ANDREW BREEDEN (sworn)**  
9 **Questioned by MR BEER**  
10 **MR BEER:** Good morning, Mr Breeden, my name is Jason  
11 Beer and I ask questions on behalf of the  
12 Inquiry. Can you tell us your name, please?  
13 **A.** Yes, it's John Andrew Breeden.  
14 **Q.** Thank you. Thank you very much for the  
15 provision of a witness statement in this case  
16 and for coming to the Inquiry today to assist us  
17 in our investigation. You should have in front  
18 of you a hard copy of that witness statement,  
19 dated 15 May 2023 and running to 51 pages. Can  
20 you look at the last page, please, page 51?  
21 **A.** Yes.  
22 **Q.** Is that your signature?  
23 **A.** It is.  
24 **Q.** Are the contents of that statement true to the  
25 best of your knowledge and belief?

1

1 **A.** The Operations Manager for the National  
2 Multiples Team covered the whole country.  
3 **Q.** Thank you. The Area Service Manager in the  
4 Central Area?  
5 **A.** Central Area, yeah.  
6 **Q.** Would you agree that your wide-ranging  
7 experience brought you into contact with many  
8 aspects of the Post Office as an organisation,  
9 from those working on the counter to more senior  
10 management?  
11 **A.** Yes.  
12 **Q.** I think specifically from April 2005 you became  
13 responsible for the management of subpostmaster  
14 contracts; is that right?  
15 **A.** I thought it was 2006.  
16 **Q.** Let's have a look.  
17 **A.** Sorry, April 2005 to August. It's the different  
18 job titles.  
19 **Q.** Yes, so paragraph 2.4 on page 2.  
20 **A.** Yes, yes.  
21 **Q.** So that's the date that, from then on, I'm  
22 particularly interested in: management of  
23 subpostmaster contracts?  
24 **A.** Yes.  
25 **Q.** Is that right?

3

1 **A.** They are.  
2 **Q.** For the purposes of the transcript only, the URN  
3 is WITN06700100.  
4 Can I start please with some questions about  
5 your career, your background and experience?  
6 **A.** Yes.  
7 **Q.** I think you have a long history as an employee  
8 of the Post Office running between 1997 to 2019;  
9 is that right?  
10 **A.** That's correct.  
11 **Q.** So a 22-year employment history?  
12 **A.** Yes.  
13 **Q.** Okay, and that's in a variety of roles  
14 including -- and I'm just going to list them to  
15 start with -- Head of Management Process for  
16 Scotland and Northern Ireland?  
17 **A.** Correct.  
18 **Q.** Head of Planning for the North Territory?  
19 **A.** Yes.  
20 **Q.** Operations Manager and Area Service Manager in  
21 the Central Area?  
22 **A.** I think the Operations Manager and the Area  
23 Service Manager are two separate roles.  
24 **Q.** Yes, I meant them as two separate roles but  
25 they're both in the Central Area; is that right?

2

1 **A.** Yes.  
2 **Q.** I think you were responsible for the Central  
3 Area of the country then?  
4 **A.** That's correct, yes.  
5 **Q.** Where did that area run from and to, what sort  
6 of area are we looking at?  
7 **A.** It was the whole of Wales and really across from  
8 probably Liverpool to the Wash, and then from  
9 South Wales across -- above London into Norfolk,  
10 I think, or into the Wash area. I can't  
11 remember exactly.  
12 **Q.** Then from September 2006 you became National  
13 Contracts Manager; is that right?  
14 **A.** Yes, that's for the North Area.  
15 **Q.** That was for the North Area. So what function  
16 did the National Contracts Manager for the North  
17 Area perform?  
18 **A.** He was responsible for a team of Contracts  
19 Advisers, who were responsible for the  
20 deployment of the subpostmasters contract, and  
21 yeah, anything that occurred, really,  
22 contractually within the live time of  
23 a subpostmaster with the business. So from them  
24 drawing in -- we were involved in the  
25 appointment of subpostmasters through to their

4

1 leaving, however that occurred.  
 2 **Q.** You explain that in your statement. It's the  
 3 entire postmaster journey, from before the  
 4 moment that they sign their contract until the  
 5 termination of their employment, however that  
 6 may have arisen?  
 7 **A.** Well, the termination of the contract of how  
 8 the -- it would have arisen, yes.  
 9 **Q.** How frequently would you come into contact with  
 10 subpostmasters in that role?  
 11 **A.** Not terribly frequently.  
 12 **Q.** Because you were a manager?  
 13 **A.** Correct.  
 14 **Q.** How frequently would the Contracts Advisers come  
 15 into contact with subpostmasters?  
 16 **A.** Possibly daily.  
 17 **Q.** In a daily basis?  
 18 **A.** Yes.  
 19 **Q.** Thank you. Were there any other  
 20 responsibilities of a National Contracts  
 21 Manager?  
 22 **A.** We were involved in the appointment of temporary  
 23 subpostmasters and the actual appeals process as  
 24 well, which was part of the contract.  
 25 **Q.** Thank you. Anything else?

5

1 **Q.** Okay. I'll give the reference for the first  
 2 one, which is the most substantial one,  
 3 POL00026886. There's no need to display that  
 4 for the moment. You gave evidence in the High  
 5 Court?  
 6 **A.** I did.  
 7 **Q.** I think you probably know that the trial judge,  
 8 Mr Justice Fraser, was critical of your  
 9 evidence?  
 10 **A.** Yes.  
 11 **Q.** If we can look at that, please, POL00022936. We  
 12 can see that this is his Common Issues judgment,  
 13 the trial judge Mr Justice Fraser. If we just  
 14 expand it a little bit --  
 15 **A.** Thank you.  
 16 **Q.** -- so we can see the whole of the page. Thank  
 17 you.  
 18 We'll see it's dated 15 March 2019 and it's  
 19 "Judgment (No 3) 'Common Issues'", which we  
 20 don't look at very often in the Inquiry. I just  
 21 want to turn to the part that relates to you and  
 22 it's page 127 of the judgment. Can you see that  
 23 there's a heading "Mr John Breeden" above  
 24 paragraph 395.  
 25 **A.** Yes.

7

1 **A.** The development of processes and policies that  
 2 impacted on our role, the policies and processes  
 3 usually were owned by a different team and we  
 4 were there to deploy them.  
 5 **Q.** You said you were involved in the development of  
 6 those policies and processes?  
 7 **A.** Yeah, what used to happen is whoever was the  
 8 owner of the policies would get the teams  
 9 involved usually that were responsible for  
 10 deploying them and we would have an input into  
 11 them to see how they would work on the ground.  
 12 **Q.** Okay, thank you. When you made this witness  
 13 statement to the Inquiry, the 51-page document  
 14 that you have just looked at, were you open and  
 15 transparent in relation to all of the answers  
 16 that you gave to the questions that you were  
 17 asked?  
 18 **A.** I believe so.  
 19 **Q.** I think it's right that you made a witness  
 20 statement in what we call the GLO or the Group  
 21 Litigation proceedings?  
 22 **A.** I did.  
 23 **Q.** That's dated 24 August 2018. You made two, in  
 24 fact, didn't you?  
 25 **A.** I can't honestly remember.

6

1 **Q.** In paragraph 395, he sets out your background.  
 2 I'm not going to read that. Then in 396 he says  
 3 that:  
 4 "[Your] witness statement covered two main  
 5 areas. These were selection and appointment of  
 6 [subpostmasters] (the beginning of their  
 7 relationship with the Post Office); and  
 8 suspension and termination (the end)."  
 9 Then if we look at 397, please:  
 10 "He [that's you] accepted that compulsory  
 11 recording of interviews with applicants  
 12 commenced on 31 March 2008. He had misstated  
 13 the date in his statement as 2006, but explained  
 14 he had done this from memory without checking  
 15 the documents. He also stated [that's you]:  
 16 'Both the subpostmaster (ie the SPMC) and NT  
 17 contracts contain important provisions governing  
 18 how these contracts may be brought to an end.  
 19 Prior to accepting his appointment,  
 20 a subpostmaster has the opportunity to review  
 21 his contract'. That very general statement is  
 22 correct only so far as the NTC is concerned. On  
 23 the evidence that I have accepted from the Lead  
 24 Claimants, it is not even remotely accurate or  
 25 correct for at least some who contracted on the

8

1 SPMC, and those affected could be a large  
 2 number. Mr Breeden is a senior person within  
 3 the Post Office and must have known that this  
 4 general statement was not wholly correct. This  
 5 is an example, I consider, of PR-driven  
 6 evidence."

7 We're going to come back a little later this  
 8 morning to what the SPMC contract was and what  
 9 the NT contract was but, if we skip over 398 and  
 10 399, and if we go to his next essential finding,  
 11 which is paragraph 400:

12 "Initially he [that's you] said that there  
 13 was no material difference in the SPMC and NTC  
 14 terms, the latter was just more explicit. That  
 15 is simply not correct, and I do not accept that  
 16 Mr Breeden could believe it was. At one point  
 17 in this evidence the following exchange took  
 18 place:

19 "Q: is it fair to say that Post Office  
 20 doesn't tend to focus on the precise words of  
 21 a contract, you know what your interpretation is  
 22 and that is what everyone is working to?

23 "A: That is the way would operate, yes.'

24 "401. This is obviously a very different  
 25 approach to the interpretation and application

9

1 aware of how much the reputation of the Post  
 2 Office hinges on these proceedings. His  
 3 evidence was presented in terms obviously  
 4 designed to put the best possible gloss for the  
 5 Post Office on matters, and some of his  
 6 statements simply did not stand scrutiny. The  
 7 one I have explained above, that SPMs had the  
 8 chance to review their contracts before  
 9 appointment, was expressly preceded by  
 10 a statement that made clear he was referred both  
 11 to the SPMC and the NTC. Such evidence is in my  
 12 judgment inaccurate, and inaccurate factual  
 13 evidence is not helpful. When faced with the  
 14 actual documents, he would agree with Mr Green's  
 15 [that's counsel for the claimants] points to the  
 16 contrary, but one reason why the factual part of  
 17 the Common Issues trial became so protracted is  
 18 because of this approach by the Post Office  
 19 generally. Agreement to even obvious points  
 20 would be reached, *eventually*, but getting there  
 21 took much longer, and a great deal more effort,  
 22 than it ever ought to have done. His evidence  
 23 was again given through a PR prism."

24 I'm not going to ask you whether you agree  
 25 or disagree with these adverse findings from the

11

1 of contract terms than is conventional under  
 2 English law. The words of a contract are  
 3 extremely important. Here, there are SPMs under  
 4 both the SPMC and the NTC. Mr Breeden's  
 5 evidence makes it clear that the Post Office  
 6 does not trouble itself with the particular  
 7 words."

8 Then if we skip paragraph 402 to 406 and  
 9 pick up at 407:

10 "Mr Breeden also explained that the Support  
 11 Services Resolution Team within the Post Office  
 12 would be able to interrogate the accounts that  
 13 came from any particular branch. He also said  
 14 that his understanding was that this team could  
 15 investigate shortfalls that a [subpostmaster]  
 16 maintained had been caused by software issues,  
 17 such as defects or bugs, and this could be done  
 18 by comparing data from the branch with data in  
 19 what he called 'secondary records' held by  
 20 Fujitsu which would be between the Post Office  
 21 and its clients."

22 Then this, paragraph 408:

23 "As with the other more senior members of  
 24 the Post Office Group of witnesses, Mr Breeden  
 25 is articulate, intelligent and also acutely

10

1 judge because that's nothing to the point at the  
 2 moment. But the issue I'd like your help with  
 3 is this: when you made your Inquiry witness  
 4 statement, did you bear in mind these findings  
 5 of the judge, that you had given evidence by  
 6 putting the best possible gloss on matters for  
 7 the Post Office and that you had given evidence,  
 8 as he put it, "through a public relations  
 9 prism"?

10 **A.** Well, what, making my current statement?

11 **Q.** Yes.

12 **A.** No.

13 **Q.** Why not?

14 **A.** I didn't feel that was something I wanted to  
 15 take into account. I have read this document,  
 16 I read this document after the hearing the judge  
 17 produced, read it, accepted what he said,  
 18 because that was the only thing I could do. But  
 19 I didn't take -- I didn't think of a PR prism or  
 20 whatever the last comment was that this  
 21 statement should be presented through that.

22 **Q.** So have you tried in your current Inquiry  
 23 witness statement, the 51-page statement, to be  
 24 open and transparent and give an unvarnished  
 25 account in relation to all matters?

12

1 **A.** I have tried to be as accurate as I possibly  
 2 can, taking into account that it is a number of  
 3 years since I worked for Post Office Limited,  
 4 and didn't take these comments into account.  
 5 So, yes.

6 **Q.** Accuracy is one thing. I'm asking about  
 7 openness and transparency. Have you tried to  
 8 give an unvarnished account?

9 **A.** I've tried to be as open as I possibly can.

10 **Q.** Can we look, please, at POL00006671. Thank you.  
 11 If we just expand the top part. You can see  
 12 that this is printed on Womble Bond Dickinson  
 13 paper and it's described as "Personal  
 14 attendance", ie an attendance note, on you, of  
 15 19 January 2018. It's with -- you can see the  
 16 name Lucy Bremner in those second set of  
 17 tramlines and another lady called Victoria  
 18 Brooks; can you see that?

19 **A.** Yes.

20 **Q.** Do you remember attending the London offices of  
 21 Womble Bond Dickinson --

22 **A.** Yes.

23 **Q.** -- at the beginning of that year, for the  
 24 purposes of, I think, giving what they described  
 25 as a proof of evidence, so a pre-witness

13

1 **A.** Yes.

2 **Q.** So I think that's a typed up recording of her  
 3 saying this meeting is recorded. This is,  
 4 indeed, a very long document. It's 64 pages of  
 5 single spaced recording of everything that  
 6 everyone said in the meeting. She continues:  
 7 "The purpose of the meeting is to obtain  
 8 a proof of evidence from you. That is really  
 9 just a document that records what you say to us  
 10 today. We want to know all of the good and all  
 11 of the bad because we want to know about any  
 12 weaknesses in Post Office's case as well as any  
 13 good points so that we can advise them properly  
 14 on what their position is. So I will be asking  
 15 you what you think the weakness was in this if  
 16 any that sort of question."  
 17 You say:  
 18 "And can that come back and haunt me at  
 19 a later date?"  
 20 She answers your question about being  
 21 haunted:  
 22 "It is only an internal document so that is  
 23 the difference between a proof of evidence and  
 24 a witness statement. It is just for us to use  
 25 internally. So what we will do is what you say

15

1 statement document, eventually for the purposes  
 2 of giving a witness statement in the Group  
 3 Litigation?

4 **A.** I remember attending. I couldn't tell you  
 5 exactly the date or when it was.

6 **Q.** You'll see that it isn't, in fact, an attendance  
 7 note as lawyers would understand it, it's  
 8 a record of a typed up version of a recording of  
 9 your meeting. Do you remember the recording was  
 10 recorded?

11 **A.** Yes.

12 **Q.** If we just scroll down please, just stop there.  
 13 The paragraph beginning "You are the most  
 14 organised person we have met", and just above  
 15 that you can see there's some introductory  
 16 exchanges between you and Ms Brooks, and in the  
 17 passage that's highlighted it says:  
 18 "You are the most organised person we have  
 19 met because so far we will support and humour  
 20 them so that is quite good to see that you have  
 21 so sorry I did not give you a minute to sort  
 22 yourself out but we have got wifi and everything  
 23 that you can connect to if you want. So as you  
 24 know the meeting is being recorded."  
 25 Yes?

14

1 if it does not come out in a logical way then we  
 2 may reorganise it so it is all done by topic but  
 3 we will not be changing it or removing anything.  
 4 With a witness statement we might remove things  
 5 that we did not want to say or polish it or you  
 6 know probe a bit further and that is a document  
 7 that will be shared with the other side so  
 8 because this one is just internal it should not  
 9 come back to haunt you."  
 10 In the light of those exchanges there, that  
 11 the lawyer was telling you that they wanted to  
 12 know all of the good and all of the bad, that  
 13 they wanted to know about any weaknesses in the  
 14 Post Office's case and you receiving reassurance  
 15 that what you said couldn't come back to haunt  
 16 you at a later stage, did you feel able to speak  
 17 freely and openly in this interview with Womble  
 18 Bond Dickinson?

19 **A.** From the best of my recollection, yes.

20 **Q.** Did you feel able to speak openly to these two  
 21 Womble Bond Dickinson solicitors because you  
 22 believed that what you said would not come out  
 23 in the future?

24 **A.** I just tried to be as honest as I could at the  
 25 time.

16

1 Q. Was that because you thought that this was, at  
2 least initially, being said behind closed doors?  
3 A. I thought that, yes.  
4 Q. I'm going to take you to some passages in what  
5 you say here and I hope that it isn't too  
6 haunting for you. Can we look, please, at  
7 page 59. It'll come up on the screen, please.  
8 A. Okay.  
9 Q. We can pick it up third paragraph. You say:  
10 "But it is exceptionally frustrating at the  
11 moment massively frustrating and I would think  
12 I do not even know how many people know this is  
13 going on because we only tell good news. We do  
14 not tell bad news that is the impression we  
15 get."  
16 A. Yeah.  
17 Q. At this date, the beginning of January 2018, was  
18 it the case that the Post Office only told good  
19 news?  
20 A. I'm trying to think of the context in which that  
21 comment was actually made.  
22 Q. If you want to look back at the bottom of  
23 page 58, if we go back a page, please, and  
24 scroll down to the bottom half of the page, and  
25 maybe if you just read to yourself the bottom

17

1 A. I think there was a desire to, yes, publicise  
2 good news and not perhaps be as balanced in  
3 the -- both internally and externally.  
4 Q. Was that a new thing, come the beginning of  
5 2018, or had it persisted for some time?  
6 A. In my view, that had been going on for a while.  
7 Q. By "a while" how long do you mean?  
8 A. A number of years. I mean to say the only real  
9 sort of example that springs to mind that I can  
10 share with you is that, when sort of issues  
11 started arising with Horizon and different  
12 events were happening externally, my  
13 recollection is that we would get some sort of  
14 communication internally about how robust the  
15 system was, how many transactions it did, and  
16 there was almost a sort of, you know -- the  
17 system is accurate and 100 per cent right, which  
18 is, you know, what I believed at the time  
19 because I had no other grounds to doubt it.  
20 Q. Just stopping there, that's not focusing, from  
21 your perspective, on the good news and not  
22 telling the bad news. That's just telling the  
23 only news --  
24 A. Right.  
25 Q. -- that Horizon is accurate, if that's all you

19

1 three paragraphs.  
2 Yes, then over the page, please.  
3 A. Sorry could you just repeat your question to me?  
4 Q. Yes, was it the case in January 2018, the  
5 beginning of January 2018, when you were  
6 speaking here, that the Post Office only told  
7 good news?  
8 A. I think there was a -- my view and recollection  
9 from now is, yes, there was a -- there was more  
10 emphasis put on the good and not on the things  
11 that perhaps weren't as good.  
12 Q. You say here "We do not tell bad news". For how  
13 long had that been the position?  
14 A. For quite a number of years, I think.  
15 Q. When you say there "we only tell good news we do  
16 not tell bad news", what kind of issues were you  
17 referring to? Who was the "telling" to, to the  
18 subpostmaster community or to the public or  
19 both?  
20 A. Or perhaps even internally. I'm struggling to  
21 recollect the sort of context of that particular  
22 comment. But --  
23 Q. The context was the previous page?  
24 A. Yeah -- where we don't tell bad news.  
25 Q. Yes.

18

1 knew, isn't it? This tends to speak to the  
2 suppression of bad news stories, doesn't it?  
3 A. Well, I guess a lot of the work that I was  
4 involved in was not good news, you know, dealing  
5 with sort of contractual matters wasn't  
6 something that was a good news story. So the  
7 Post Office would never sort of say how many  
8 sort of issues there'd been or how many  
9 suspensions there'd been, I don't think.  
10 Q. So this that we read here includes, in your  
11 view, issues relating to the operation of the  
12 Horizon system?  
13 A. I'm thinking it could do. I mean to say, in  
14 looking at the sort of previous paragraphs, the  
15 line looks as if it was also about the sort of  
16 viability of the sort of branches, because they  
17 talked about -- can we just go back?  
18 Q. Yes, back to page 58, please, and just look at  
19 the bottom. The bad things that I noticed in  
20 the previous paragraphs were three paragraphs  
21 from the bottom:  
22 "I think the only thing you need to just add  
23 into all of that is the complexity and I think  
24 when we explain to a new subpostmaster during  
25 the NT sort of stuff none of them knew what they

20

1 were getting involved in from a complexity point  
 2 of view."  
 3 **A.** Yeah, and I think I'm trying to make the point  
 4 that, you know, for the level of complexity in  
 5 running a Post Office was not straight -- was  
 6 not low and, if you take, sort of like, the  
 7 local model, which was included within the  
 8 retail counter, there was an expectation that  
 9 staff would move between the retail and the Post  
 10 Office Counter and I think that was, at times,  
 11 unrealistic. But that wasn't something that you  
 12 would do a -- be promoting when you were trying  
 13 to encourage people to take the model on.  
 14 **Q.** At this time, by January 2018, had you formed  
 15 the view that the Post Office as an organisation  
 16 was focused on its brand image, rather than  
 17 doing the right thing by subpostmasters?  
 18 **A.** I think the Post Office was always focused on  
 19 its brand image because it had a very, very  
 20 strong brand. That was part of the reason  
 21 I joined the Post Office many years ago.  
 22 **Q.** There was a second part to my question, namely  
 23 at the expense of or over and above doing the  
 24 right thing by subpostmasters?  
 25 **A.** I think perhaps knowing what I know now, yes,

21

1 Then at paragraph 37, we can just see it at  
 2 the foot of the page there, you turn to deal  
 3 with the "Contractual Liability of  
 4 Subpostmasters for Shortfalls".  
 5 **A.** Yes.  
 6 **Q.** That's on pages 16, 17 and 18, if we just scroll  
 7 through and see those. So they're the two  
 8 topics that you're addressing here: appointment  
 9 of subpostmasters; and then contractual issues,  
 10 what's in their contract. You do not say in any  
 11 of those paragraphs, in any of those 13 pages,  
 12 nor anywhere else in the 51-page witness  
 13 statement, anything about the inherent  
 14 unfairness and undue risks for subpostmasters in  
 15 their contracts, do you?  
 16 **A.** No.  
 17 **Q.** Can we look, please, at POL00006671. It's the  
 18 recording of the attendance at Womble Bond  
 19 Dickinson again, and can we go to page 38,  
 20 please. Top of the page:

21 "You know and some sort of spotty little  
 22 oink [*sic*] like me coming in working four hours  
 23 a night and he knows it is just sort of to keep  
 24 the grant going and stuff like that but he could  
 25 lose me money that I am liable for. There are

23

1 that might be a true statement.  
 2 **Q.** Where did that culture come from, in your view?  
 3 **A.** I think it was just -- was just part of the DNA  
 4 of the business.  
 5 **Q.** Who was responsible for establishing the DNA of  
 6 the business?  
 7 **A.** In my view, it came from the top.  
 8 **Q.** Thank you. That can come down.  
 9 Can I turn to the first issue, then the  
 10 appointment of subpostmasters and contractual  
 11 issues.  
 12 **A.** Yeah.  
 13 **Q.** You deal with that in your witness statement --  
 14 **A.** Yes.  
 15 **Q.** -- at paragraphs 13 to 36. If we just turn  
 16 those up, please, that's page 5 of the witness  
 17 statement, WITN06700100 -- page 5, please,  
 18 scroll down.  
 19 There's a whole subchapter of your statement  
 20 here, "Appointment of Subpostmasters", and if we  
 21 just scroll on, paragraph 13 over the page, all  
 22 through 15, over the page, 17, over the page,  
 23 and then over the page again, and again, and  
 24 again, and again, and again, and again, right up  
 25 to page 16.

22

1 a lot of tensions in my head, you know."  
 2 The solicitor says:  
 3 "Yeah there is that is really interesting  
 4 actually."  
 5 You say:  
 6 "I wouldn't do it. Having said I will say  
 7 I wouldn't [I think that next word should be  
 8 'sign'] I wouldn't [sign] one of my contracts  
 9 because I think there is too much weighted  
 10 against you. You are on the hook to do  
 11 everything. But that doesn't absolve people  
 12 from you know, staying there and say the  
 13 contract is unfair. You should have read it  
 14 before you signed it you know. I think I would  
 15 be very cautious about it."  
 16 Do you agree with me that that should read  
 17 "I wouldn't sign one of my contracts", rather  
 18 than "sell"?  
 19 **A.** I think it's more likely to say "sign", yes.  
 20 **Q.** Yes. Why wouldn't you sign a Post Office  
 21 contract?  
 22 **A.** Because I just thought the terms of them weren't  
 23 something I personally would want to get into.  
 24 **Q.** Because they were unfair?  
 25 **A.** Because I thought they were not something

24

1 I would want to get into.  
 2 **Q.** Because you thought they were unfair?  
 3 **A.** From my --  
 4 **Q.** Well --  
 5 **A.** From my perspective, I wouldn't have signed it  
 6 because I just thought they were weighted  
 7 against the subpostmaster.  
 8 **Q.** Why was there too much weighted against the  
 9 subpostmaster?  
 10 **A.** It just felt to me that there was a lot of  
 11 clauses in there that were things that could --  
 12 you know, you could lose your contract for and  
 13 there wasn't a great deal that -- going for  
 14 the -- that POL were doing.  
 15 **Q.** I missed that last answer. There wasn't a good  
 16 deal going for --  
 17 **A.** There wasn't a great deal coming from Post  
 18 Office Limited. So the obligations were all on  
 19 the subpostmaster.  
 20 **Q.** Was that a commonly held view amongst senior  
 21 managers of your level?  
 22 **A.** I really don't know. That was my view.  
 23 **Q.** You were responsible for the team or a team that  
 24 asked subpostmasters to sign these contracts?  
 25 **A.** Yes.

25

1 came with more time passing, in the latter part  
 2 of my career with the Post Office.  
 3 **Q.** But, even though you held that view, you were  
 4 responsible for years and years for a team that  
 5 enabled subpostmasters to sign these contracts  
 6 and then enforced them against subpostmasters?  
 7 **A.** Yeah, I think the sort of turning point was the  
 8 contracts related to Network Transformation.  
 9 **Q.** Is that 2011?  
 10 **A.** Yeah, I think that's when the programme started.  
 11 But the contracts did evolve, because they  
 12 started with pilot contracts and then there was  
 13 a number of iterations. There were many  
 14 contracts.  
 15 **Q.** You've been quite forthright and open in this  
 16 interview with the solicitors here --  
 17 **A.** Yeah.  
 18 **Q.** -- saying, "I've got national responsibilities  
 19 for contracts with subpostmasters, I wouldn't  
 20 sign one". Why didn't you tell us that in your  
 21 witness statement?  
 22 **A.** I don't know.  
 23 **Q.** I asked you at the beginning a couple of times  
 24 whether you were open and transparent --  
 25 **A.** Yes, yes.

27

1 **Q.** Was the view that you held one that was commonly  
 2 understood amongst senior managers in the Post  
 3 Office, namely that there was an imbalance of  
 4 obligations that the contract was weighted  
 5 against subpostmasters?  
 6 **A.** I honestly don't know. I can only tell you what  
 7 my view was at the time.  
 8 **Q.** If we go to page 58, please. Just to confirm  
 9 that the words you spoke earlier on page 38 had  
 10 the meaning that I thought that they did, just  
 11 at the foot of the page there:  
 12 "It does not grab the hearts and the minds  
 13 of people. Mostly people walking down the  
 14 street does it."  
 15 The solicitor says:  
 16 "It is very interesting to hear your views  
 17 on that."  
 18 Then the next answer, you say:  
 19 "And like I say I would not sign  
 20 a contract."  
 21 Yes?  
 22 **A.** Yes.  
 23 **Q.** Was that a view that you held from at least  
 24 2005, April 2005, onwards?  
 25 **A.** No, I think that's a view that I -- probably

26

1 **Q.** -- in making your witness statement and you said  
 2 yes, you tried to be?  
 3 **A.** I don't recall anything in the Rule 9 letter  
 4 that perhaps would have elicited that sort of  
 5 comment. I might be wrong.  
 6 **Q.** Despite speaking for 16 pages about the terms  
 7 and conditions of postmaster contracts, you  
 8 didn't think it was relevant to say "I held down  
 9 a job for a number of years at a national level  
 10 and I formed the view that the contracts we were  
 11 asking the subpostmasters to sign were  
 12 inherently unfair". Did we need to ask you the  
 13 question: did you think the contracts were fair  
 14 or not, Mr Breeden?  
 15 **A.** Yes, perhaps. I mean to say, I don't know.  
 16 **Q.** Can we turn to page 5 of this document, please.  
 17 Just forgive me a moment. In the middle  
 18 paragraph the one starting "Firstly I am  
 19 probably not terribly attractive", which is  
 20 presently at the foot of the page here, if we  
 21 just scroll down a little bit, thank you.  
 22 About six lines up from the bottom of that  
 23 paragraph, a sentence begins -- and it's you  
 24 speaking, and you say:  
 25 "I thought this business always had very

28

1 good values and morals and stuff like that.  
 2 I think at the moment some of those are  
 3 sometimes just tested a little bit further than  
 4 probably I feel 100% comfortable with. I think  
 5 there is a point where you know if my personal  
 6 values and stuff like that did not particularly  
 7 weigh then I could not work in a place that you  
 8 know it does not matter how much money they are  
 9 paying me but where their actions are very  
 10 diverse to what I believe is the right thing to  
 11 do that is when I would sort of struggle."

12 The values and morals to which you refer  
 13 there, that were being tested further than you  
 14 felt comfortable with, what were they?

15 **A.** That was the likes of openness, trustworthy,  
 16 honesty.

17 **Q.** How were your values and morals being tested by  
 18 the Post Office?

19 **A.** I just thought some of the actions that were  
 20 being -- were going on at that particular time,  
 21 and that had no doubt happened earlier, were  
 22 just starting to push the boundaries on some of  
 23 these areas.

24 **Q.** Which issues were pushing the boundaries of  
 25 moralities and values?

29

1 sort of just -- you just start wondering, don't  
 2 you, what's going on?

3 **Q.** This seems to have something different in mind.  
 4 This seems to, if I may say, be a statement that  
 5 you realised, if it referred to Horizon, that  
 6 you weren't being told the whole truth or that  
 7 the truth wasn't being told publicly?

8 **A.** I mean to say, I can't recall exactly what that  
 9 was relating to but I just felt that, at that  
 10 time, that some of the things that were going on  
 11 were -- I was struggling with.

12 **Q.** Can you try and help us a little more, please,  
 13 because, on the account you've given in your  
 14 witness statement, you believed, right up until  
 15 after the Horizon Issues judgment in 2019, that  
 16 Horizon had integrity and there were no material  
 17 bugs, errors and defects?

18 **A.** Mm-hm.

19 **Q.** If this, in part, refers to Horizon and you're  
 20 speaking here in January 2018, what was in your  
 21 mind?

22 **A.** Well, at that point in 2018, Horizon, in my  
 23 mind, was accurate but I think what's going on  
 24 in your head is there's -- there must be  
 25 something going on that we've perhaps not been

31

1 **A.** Well, I think the way -- well, as you know,

2 I had issues with the contract --

3 **Q.** Just stopping there, sorry, this is, again,  
 4 a reference back to the nature of the  
 5 subpostmaster contract, in part?

6 **A.** Well, I would say, you know, if you're -- sorry,  
 7 I thought you were asking me what things were  
 8 sort of pushing the -- my concerns.

9 **Q.** Yes.

10 **A.** I think one of them would have been the  
 11 subpostmasters contract. I think another one  
 12 would have been perhaps the sort of Horizon  
 13 activities that were going on.

14 **Q.** Just stopping there, sorry, to break it down.

15 What were you referring to in particular, then,  
 16 in your mind where the Post Office's values and  
 17 morals were not in accordance with your own, so  
 18 far as Horizon was concerned?

19 **A.** Well, I mean to say, you know, we were  
 20 constantly being told that Horizon was okay, it  
 21 was fit for purpose and what it did was the  
 22 right thing, which, you know, is clearly not the  
 23 case --

24 **Q.** You didn't know that by then?

25 **A.** No, I didn't know that by then but I guess it

30

1 told about. I don't know. Perhaps I was just  
 2 over thinking it at the time but I just --  
 3 because my job so reliant on that piece of  
 4 equipment being accurate and, you know, from  
 5 that point of view, you start thinking the  
 6 what-ifs, I suppose, without any grounds to  
 7 think them on, but perhaps that's the way I was  
 8 thinking there.

9 **Q.** Mr Breeden, this is referring to reality here.  
 10 You say that there are things that test you  
 11 further than you feel comfortable with.

12 **A.** Yeah.

13 **Q.** You're referring there to something that  
 14 actually happened --

15 **A.** Yeah.

16 **Q.** -- not imagining meaning things --

17 **A.** No.

18 **Q.** -- not over thinking things.

19 **A.** No.

20 **Q.** What were the things that were happening that  
 21 tested your values and morals more than you felt  
 22 comfortable with?

23 **A.** Well, the only other thing that -- because, you  
 24 know, to clarify, I did not know there was any  
 25 issues with Horizon at that point. It would be

32



1 the rollout of different programmes that were  
2 going on in the business because I think, at  
3 that stage, we'd be coming to the end of the  
4 change programme and how that was perhaps being  
5 completed, because they were clearly the harder  
6 parts of the programme to complete, the tail  
7 end.

8 **Q.** In what way did the rollout of different  
9 programmes test your values and morals --

10 **A.** Well --

11 **Q.** -- more than you felt comfortable with?

12 **A.** I think at times we were, as a team, put under  
13 a bit of pressure to make appointments, to allow  
14 individual branches to be resolved and converted  
15 under the programme.

16 **Q.** So we should read this part of this paragraph as  
17 referring to three things: firstly, the unfair  
18 postmaster contract; secondly, Horizon; and,  
19 thirdly, the rolling out of new programmes?

20 **A.** Yes, but, like I say, at that point, I didn't  
21 know there was any problem with Horizon.

22 **Q.** We're going to come back to knowledge of  
23 problems with Horizon a little later today. Can  
24 I turn to a new topic. That can come down,  
25 please.

33

1 the other. The first was the subpostmaster  
2 contract, the SPMC, yes?

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

4 **Q.** Which was modified in 2006 and became known as  
5 the Modified SPMC, correct?

6 **A.** Well, I think there was a modification -- there  
7 were two separate contracts but you could still  
8 be appointed on the first one you mentioned  
9 after 2006.

10 **Q.** Then the second species of contract was the  
11 Network Transformation Contract, the NTC?

12 **A.** Yeah.

13 **Q.** That became used after the Network  
14 Transformation Programme, the NTP, was initiated  
15 in 2011; does that sound right?

16 **A.** Yeah, there was -- after 2011, there was  
17 still -- I think when the programme started  
18 there wasn't sufficient funding to transform the  
19 whole estate, it was only about half of it. So  
20 there was still offices that would continue on  
21 the -- what I would call the traditional  
22 subpostmaster contract.

23 **Q.** So the SPMC was issued, would this be right,  
24 between the years 1994 and 2011, in the modified  
25 form after 2006, but new contracts were issued

35

1 At page 30 of your witness statement,  
2 please, at paragraph 92. You say:

3 "In all the roles I had from 2006 I was  
4 responsible for deploying the processes related  
5 to suspensions, terminations ... The preparation  
6 of the policies and processes to be followed was  
7 undertaken by a Policy Team, usually with input  
8 from those who deployed the policies and  
9 processes."

10 So that's similar to what you said earlier  
11 today?

12 **A.** Yeah.

13 **Q.** Do I understand from this that you had, and your  
14 team had, a role in the development and then  
15 signing-off of policies concerning suspensions,  
16 terminations and the appeals processes?

17 **A.** We had a role in the development. We had input  
18 into the development but the sign-off was  
19 undertaken by whoever owned the policy.

20 **Q.** I see, but then you had a role in implementing  
21 them, ie carrying them into effect?

22 **A.** Yes.

23 **Q.** Now, we've heard evidence that there were two  
24 different types of contracts between the Post  
25 Office, on the one hand, and subpostmasters, on

34

1 as the Network Transformation contract after  
2 2011?

3 **A.** I don't think that is correct, no.

4 **Q.** Can you tell me then what you think is correct?

5 **A.** What I believe is correct is the SPSMR,  
6 subpostmaster contract, was available from the  
7 date in the 1990s --

8 **Q.** '94 --

9 **A.** -- that you mentioned but that could still be  
10 issued into beyond 2011 because there was still  
11 branches that weren't suitable, for want of  
12 a better word, to go onto the Network  
13 Transformation Programme. So, if there was any  
14 change in those offices, they would continue.  
15 What used to happen, just not to digress, but is  
16 that when a vacancy arose in the network, the  
17 Network Transformation Programme would model  
18 that to see what type of branch, whether it  
19 would be one under the Network Transformation  
20 Programme or not or whether it would retain  
21 initially as a traditional contract.

22 The modified contract -- I'm struggling to  
23 remember this but was not used wide scale across  
24 the network. There was -- I can't remember how  
25 many there were but they were issued in,

36

1 I think, more specific situations, perhaps where  
 2 there'd been a Crown Office that had converted.  
 3 **Q.** I understand. Let's look at a couple of species  
 4 or versions of the contract. Can we start,  
 5 please, with POL00000246. If we just go to  
 6 page 3 please, and scroll down. We can see  
 7 a list of amendments. The last one is 2006, and  
 8 we can see the date of the document at the  
 9 bottom right -- bottom left, July 2006; can you  
 10 see that?  
 11 **A.** Yes, yes.  
 12 **Q.** If we can go to page 71, please. It's  
 13 paragraph 12, this is within section 8 of the  
 14 contract under the heading "Losses".  
 15 **A.** Yes.  
 16 **Q.** "The subpostmaster is responsible for all losses  
 17 caused through his own negligence, carelessness  
 18 or error, and also for losses of all kinds  
 19 caused by his Assistants. Deficiencies due to  
 20 such losses must be made good without delay."  
 21 **A.** Yes.  
 22 **Q.** "13. The financial responsibility of the  
 23 subpostmaster does not cease when he  
 24 relinquishes his appointment and he will be  
 25 required to make good any losses incurred during

37

1 losses of all kinds caused by their assistants,  
 2 whether they're responsible for or caused by  
 3 negligence, carelessness or error?  
 4 **A.** Mm. It just seems a very catch-all sort of  
 5 statement that I wouldn't have felt comfortable  
 6 with.  
 7 **Q.** Was it your view that, nonetheless,  
 8 subpostmasters wouldn't have contractual  
 9 liability for shortfalls if they were caused by  
 10 bugs, errors and defects in the Horizon system  
 11 not being their negligence, carelessness or  
 12 error?  
 13 **A.** Well, if it's caused by not negligence,  
 14 carelessness or error, I suspect it wouldn't be,  
 15 no.  
 16 **Q.** Can I look then at what subpostmasters were told  
 17 when the Post Office sought to recover money  
 18 from them, when it was sending letters before  
 19 claim to them and when it was considering  
 20 suspending them and bringing proceedings against  
 21 them. I just want to look at three example  
 22 letters if I may. Can we start with  
 23 LCAS0001117. You'll see this is a letter to  
 24 Mr Lee Castleton, dated 18 August 2004.  
 25 **A.** Mm-hm.

39

1 his term of office which may subsequently come  
 2 to light."  
 3 Is this, the provision in paragraph 12,  
 4 amongst those which you considered to be unfair  
 5 and, therefore, you personally wouldn't have  
 6 signed it?  
 7 **A.** I personally wouldn't sign that, no.  
 8 **Q.** Was that because the contractual provision was  
 9 a slanted foundation stone for establishing  
 10 liability against a subpostmaster?  
 11 **A.** I'm not sure what you're saying there.  
 12 **Q.** You tell us then why you would include this as  
 13 amongst the clauses in the contract that you  
 14 would regard as unfair and therefore not sign?  
 15 **A.** It just felt to me personally it was very wide  
 16 reaching.  
 17 **Q.** Why was it wide reaching?  
 18 **A.** Because of the fact that it -- the terms  
 19 "negligence, carelessness or error".  
 20 **Q.** I'm sorry?  
 21 **A.** Because of the way the first sentence is worded.  
 22 You know, "thorough negligence, carelessness or  
 23 error".  
 24 **Q.** What about the sentence or the part of the  
 25 sentence which fixes the subpostmaster for all

38

1 **Q.** It's in respect of his branch, the Marine Drive  
 2 Post Office and, if we scroll down to the  
 3 bottom, we can see who it's sent by.  
 4 **A.** Yes.  
 5 **Q.** An "Agents Debt" -- is that team 3 -- "Former  
 6 Subpostmasters Accounts"?  
 7 **A.** Yeah, I would imagine that's team 3.  
 8 **Q.** In Chesterfield?  
 9 **A.** Yes.  
 10 **Q.** Then just scroll back up to look at the terms of  
 11 the letter:  
 12 "I am writing to you in respect of number of  
 13 errors that have come to light in the accounts  
 14 ...  
 15 "The sum of £27,000 is due to Post Office  
 16 ...  
 17 "I have attached a copy of our statement of  
 18 errors ..."  
 19 Then this:  
 20 "Since you are contractually obliged to make  
 21 good any losses incurred during your term of  
 22 office for up to six years ... it would be  
 23 appreciated if you could afford a cheque, made  
 24 payable to Post Office, for the amount to the  
 25 address below within 21 days ..."

40

1 Can we look, please, at POL00004671. We can  
2 see this is a letter dated 2010, March 2010, in  
3 the top right. It's a reminder letter to Pamela  
4 Stubbs at an office in Wokingham. Then at the  
5 foot of the page, please, "Current Agents' Debt  
6 Team Leader", this was sent buy. If we scroll  
7 up, please:

8 "Dear Mrs ... Stubbs

9 "I am writing to you in respect of the  
10 recovery of outstanding debts in the accounts  
11 ... According to our records the sum of  
12 [£17,000-odd] is overdue for payment.

13 "Since you are contractually obliged to make  
14 good any losses incurred during your term of  
15 office, please call the debt recovery team on  
16 the number quoted to so this will this amount  
17 via credit/debit card.

18 "Alternatively forward a cheque ...

19 "Failure to meet these repayment terms may  
20 lead us to deduct the outstanding debt from your  
21 future remuneration ..."

22 Then, lastly, POL00044903. A little later  
23 in 2010, a letter to Allison Henderson, at the  
24 Worstead Post Office branch. Foot of the page  
25 please, "Former Agents Debt", a team in

41

1 losses".

2 **A.** Yes.

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

4 **A.** Yes, if they weren't made through carelessness,  
5 error.

6 **Q.** That's an important qualification. Even though  
7 you regarded it yourself as still unfair, it's  
8 not as wide as any losses whatsoever, is it?

9 **A.** No.

10 **Q.** Would you regard that as just a matter of  
11 terminology?

12 **A.** I think that is a matter of terminology, yes.

13 **Q.** Or would it represent the fact of a belief in  
14 senior management at this time that  
15 subpostmasters were liable for all losses,  
16 irrespective of the cause of them?

17 **A.** Yes, I think it would.

18 **Q.** Was that a commonly prevailing view:  
19 subpostmasters are liable for all losses?

20 **A.** I think, as a generalisation, yes.

21 **Q.** Is that, therefore, an example of what the judge  
22 described as the Post Office not really caring  
23 much about what the actual terms of the contract  
24 say and instead relying on its own belief as to  
25 what it thought the position was?

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1 Chesterfield. Then up, please:

2 "I am writing to you in respect of the  
3 recovery of deficiencies founding in the  
4 accounts at the above Post Office whilst you  
5 were subpostmaster.

6 "The sum of [just under £12,000] is due to  
7 Post Office to clear the account ...

8 "Since you are contractually obliged to make  
9 good any losses incurred during your term of  
10 office", et cetera.

11 Do you agree this standard form of wording  
12 that we've seen in each of the three letters,  
13 "you are contractually obliged to make good any  
14 losses during your term of office", materially  
15 misstates the contractual obligations of  
16 a subpostmaster?

17 **A.** Misstated?

18 **Q.** Yes, it doesn't include the fact that the loss  
19 needs to be due to their negligence --

20 **A.** It's not using --

21 **Q.** -- et cetera --

22 **A.** -- yeah, the same terminology as is in the  
23 contract.

24 **Q.** It therefore misstates the obligation. It says,

25 "You are contractually obliged to make good any

42

1 **A.** I think that's potentially correct, yes.

2 **Q.** How did that come about, that state of mind?

3 **A.** I think it was there all the time.

4 **Q.** Do you agree that that is poor behaviour by the  
5 Post Office, telling subpostmaster that they've  
6 got to pay up, under their contract, thousands  
7 or tens of thousands of pounds because, under  
8 their contract, they're liable to make good any  
9 losses when the contract didn't say that at all?

10 **A.** With hindsight, yes.

11 **Q.** Why does it take hindsight to realise that?

12 **A.** I suppose you just get caught in the way things  
13 take place in a business, don't you?

14 **Q.** So because the culture, the ethos, the morals of  
15 the business have developed in a certain way,  
16 you don't have regard to the true position  
17 according to contractual documents or the law.

18 **A.** What, me personally or the Post Office?

19 **Q.** Yes, no, the Post Office.

20 **A.** Yeah, I think -- well, I think there was a view  
21 that if you mentioned the contract, you know,  
22 things would happen.

23 **Q.** Okay. So the mere mention of the contract --

24 **A.** Yeah, I think it's almost used as a little bit,  
25 perhaps, of a stick to get things done because

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1 I was very conscious that, in my time there,  
 2 that, particularly when sort of developing  
 3 stuff, that the appropriate interventions had  
 4 taken place before something was referred to my  
 5 team and it was a matter that was a contractual  
 6 matter, because that wasn't the case in all  
 7 instances.

8 **Q.** Thank you. Can we turn back to your witness  
 9 statement, please, and look at page 17,  
 10 paragraph 41. If we can just highlight 41,  
 11 please, page 17. That's it. You say:  
 12 "Where a loss had been incurred and the  
 13 reason for the loss was known and a compensating  
 14 error was expected to be issued, losses could be  
 15 held in the suspense account. The subpostmaster  
 16 would have to have investigated the loss and  
 17 know when it occurred, ie a date, and have  
 18 evidence of the error. Authority to hold the  
 19 amount in the suspense account would be given by  
 20 the Agent Debt Team. This facility was only  
 21 available where there was a known error."  
 22 **A.** Yeah.  
 23 **Q.** Was the suspense account, on your understanding  
 24 of it, only to be a safe haven for sums which  
 25 were the product of an error that had already

45

1 the subpostmaster had no evidence in relation to  
 2 the cause of the error?  
 3 **A.** I think it would be highly unlikely then.  
 4 **Q.** I'm sorry?  
 5 **A.** I think it would be unlikely.  
 6 **Q.** That he would be allowed or she would be allowed  
 7 to put it in response?  
 8 **A.** I don't think they would be given authority to  
 9 do that.  
 10 **Q.** The judge -- and I'm not going to go through his  
 11 many findings that established this -- held in  
 12 his Common Issues judgment that it was almost  
 13 impossible for postmasters fully to investigate  
 14 the causes of discrepancies or shortfalls in  
 15 their branches due to their limited access to  
 16 back office and computing information and data.  
 17 How would a subpostmaster establish the  
 18 reason for the loss and produce evidence of it  
 19 in those circumstances?  
 20 **A.** Just by looking through the printouts from  
 21 Horizon.  
 22 **Q.** How would they establish that the cause of  
 23 a loss was the system and not them either  
 24 miskeying a sum, their staff miskeying a sum or  
 25 them or their staff not taking money or stock?

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1 been established, therefore?  
 2 **A.** That was my understanding of suspense, yeah,  
 3 that you had to have authority to put something  
 4 into the suspense account.  
 5 **Q.** Authority might be a different issue.  
 6 **A.** Okay.  
 7 **Q.** I'm asking, at the moment, whether the suspense  
 8 was a place, an account to put sums which were  
 9 the product of an error that had already been  
 10 established, ie where the reason was known --  
 11 **A.** Yes.  
 12 **Q.** -- and the postmaster had evidence of the  
 13 error --  
 14 **A.** Yes.  
 15 **Q.** -- which are the two things you mention here?  
 16 **A.** Yeah.  
 17 **Q.** Is that right?  
 18 **A.** Yes, I think so.  
 19 **Q.** Not to place sums which were in dispute and  
 20 an investigation was necessary in order to  
 21 establish the cause of the loss?  
 22 **A.** I think you probably -- if you were disputing  
 23 something, it could have been put in suspense as  
 24 well.  
 25 **Q.** Even if the cause of the error was not known and

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1 **A.** I don't know how they would do that.  
 2 **Q.** It's an impossibility, isn't it?  
 3 **A.** I think it is.  
 4 **Q.** On the data that they had available to them,  
 5 they couldn't do it?  
 6 **A.** I wouldn't have thought so.  
 7 **Q.** Yet, if they wanted to place a sum in suspense,  
 8 they had to do it?  
 9 **A.** Yes.  
 10 **Q.** Was this another example of unfairness, as you  
 11 saw it, requiring subpostmasters to undertake  
 12 the impossible?  
 13 **A.** As you put it like that, it wasn't one that  
 14 perhaps was at the forefront of my mind at the  
 15 time but, as you put it like that, yes.  
 16 **MR BEER:** Sir, I wonder whether we could take the  
 17 morning break now. I was going to propose that  
 18 we took lunch between 12.30 and 1.30 today, if  
 19 that's acceptable to you, for a range of reasons  
 20 and, therefore, that would make the morning  
 21 break now convenient until 11.25.  
 22 **SIR WYN WILLIAMS:** Yes, that's fine.  
 23 Could I just ask you, in the first instance,  
 24 Mr Beer, or Mr Breeden, these provisions that we  
 25 are now talking about relating to the use of the

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1 suspense account, were they written into the  
2 contract or were they independent of the  
3 contract or subject to some kind of instruction,  
4 or what?

5 **MR BEER:** Sir, I'm not going to give evidence. Let  
6 Mr Breeden answer it and, even if I thought  
7 I knew the answer, I would "phone a friend"  
8 first to make sure that what I thought was  
9 correct.

10 **SIR WYN WILLIAMS:** It's just something that struck  
11 me as you were quite correctly pointing out the  
12 difference between the contractual provisions  
13 and the letters. It then made me wonder how  
14 these provisions about the use of the suspense  
15 account were regulated.

16 If you know the answer, Mr Breeden, would  
17 you tell me? If you don't, Mr Beer will "phone  
18 a friend".

19 **A.** Could I "phone a friend" as well?

20 **SIR WYN WILLIAMS:** I think at some stage, I'd just  
21 like to know the answer, that's all.

22 **A.** The suspense account, it wasn't a term in the  
23 contract. So I would imagine that it was  
24 subject to what I'm going to term as like office  
25 instructions --

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1 (11.30 am)

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

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

5 **MR BEER:** Thank you very much. Mr Breeden, can we  
6 continue by looking at a real-world example of  
7 some of the issues we have just been speaking  
8 about by looking at POL00021163. This is  
9 an email thread from 2009 involving you, and  
10 I should read it all. It will take a little  
11 while to run through it, just so you've got  
12 complete context before I ask you some questions  
13 about it.

14 Can we go to page 5, please, and look at the  
15 foot of the page, please. If we just scroll  
16 down a little bit further, we'll see who Karen  
17 was -- just onto page 6 -- a Contract Manager,  
18 North Central. Was that somebody you had  
19 responsibility for in 2009?

20 **A.** Yes.

21 **Q.** Yes, thank you. So if we scroll back up,  
22 please, to the bottom of page 4, we can see the  
23 chain starts with her email to Gary Blackburn.  
24 We'll find out in a moment that he was part of  
25 the service delivery branch and his job title

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1 **SIR WYN WILLIAMS:** Right, I follow.

2 **A.** -- and by contact of the sort of expert domain  
3 within Post Office Limited. So, you know, if  
4 an error had occurred, they would no doubt ring  
5 Chesterfield or, if they had in issue, and  
6 that's where it would probably get advice from.

7 **SIR WYN WILLIAMS:** All right. Thank you.

8 **MR BEER:** Sir, I should say that accords with my  
9 initial view, before seeking confirmation of it,  
10 that, in the iterations of the contract we've  
11 got, the operation of the suspense account is  
12 not a term of the contract. We've got over  
13 a dozen, I think, policies and instructions that  
14 address the operation of the suspense account --

15 **SIR WYN WILLIAMS:** Yes.

16 **MR BEER:** -- and we can look at those and maybe  
17 summarise those for you in due course.

18 **SIR WYN WILLIAMS:** Thank you very much.

19 Do you need an extra few minutes now, as  
20 a result of my intervention?

21 **MR BEER:** 11.30, please, sir.

22 **SIR WYN WILLIAMS:** That's fine.

23 **MR BEER:** Thank you.

24 (11.13 am)

(A short break)

50

1 was "Live Service and Business Continuity  
2 Manager", Mr Blackburn. What would a Live  
3 Service and Business Continuity Manager do, can  
4 you recall?

5 **A.** I couldn't honestly hazard a guess.

6 **Q.** Right, okay. Karen Arnold says:

7 "Gary.

8 "Further to our conversation last week  
9 regarding the losses at Hogsthorpe ..."

10 You can see the subject title of the email  
11 is "Hogsthorpe" and then there's a FAD code,  
12 yes?

13 **A.** Yes.

14 **Q.** "... the [subpostmaster], David Hedges (who  
15 likes to be known as Tom) has contacted the NBSC  
16 to establish what the BAU ..."

17 "Business as usual", I think that means?

18 **A.** Yes.

19 **Q.** "... BAU/correct process is for suspending  
20 a session of Smartpost. Tom tells me that the  
21 NBSC said it was okay to use either of the  
22 methods he describes, as a reminder I have  
23 copied information below in respect of what he  
24 described to me last week."

25 Over the page. Again, there's the cut-in

52

1 passage which Tom, Mr Hedges, had described.  
 2 "Tom said that he does a lot of postage and  
 3 customers come in and leave their items of mail  
 4 and a blank cheque, so they don't have to wait.  
 5 He then processes the items in between serving  
 6 other customers. Previously he would have  
 7 several items on the sales stack, items for  
 8 which labels had been printed and if a customer  
 9 came in he would suspend the session, from the  
 10 Smartpost screen and serve other customers  
 11 before going back and swapping back into the  
 12 suspended session. This would take him straight  
 13 back to the Smartpost screen, but when he  
 14 initially suspended the session it would take  
 15 a long time, as it also did when he swapped to  
 16 go back into the suspended session. Around the  
 17 time the losses started he changed how he  
 18 suspended the session. Items in the sales stack  
 19 and in Smartpost, when a customer came in he  
 20 started going back to serve customer, suspending  
 21 the session from there, would serve other  
 22 customers and then swap to go back into the  
 23 suspended session, by doing it this way it took  
 24 him back to the serve customer screen and both  
 25 the suspending of the session and returning back

53

1 **Q.** -- which could end up in suspension and  
 2 dismissal?  
 3 **A.** Yes.  
 4 **Q.** Thank you. Carrying on:  
 5 "If this does happen then the  
 6 [subpostmaster] will have the opportunity of  
 7 attending an interview, in which I am sure he  
 8 will raise what he believes is an issue with  
 9 Smartpost suspended sessions contributing to  
 10 losses at the branch. At this point it well  
 11 have to be investigated, I therefore feel it  
 12 will be beneficial to do this now and would  
 13 appreciate your help with this.  
 14 "Regards  
 15 "Karen."  
 16 So you understand I think, the issue being  
 17 raised here, is this a fair summary:  
 18 a subpostmaster suspending sessions whilst in  
 19 Smartpost --  
 20 **A.** Yes.  
 21 **Q.** -- changing the manner in which he suspended the  
 22 sessions and alleging that that change was  
 23 causing losses to show?  
 24 **A.** Yeah. I understand -- you know, I have read the  
 25 text and see --

55

1 into the suspended session was far quicker this  
 2 way, than how he did it previously."  
 3 Then Karen Arnold continues:  
 4 "Tom unless spoke to the 'Horizon Helpdesk'  
 5 yesterday about this and also the losses which  
 6 he believes have started since he changed his  
 7 procedures [a reference number is given].  
 8 I understand from Tom that a visit has now been  
 9 arranged for today to swap the central  
 10 processor. Once this swap out has been  
 11 completed, can you tell me whether any  
 12 investigation is carried out with the old  
 13 processor.  
 14 "As I mentioned last week, if losses  
 15 continue then I could end up with a conduct  
 16 case."  
 17 Just stopping there, what would you  
 18 understand a "conduct case" to mean?  
 19 **A.** Certainly, as a minimum, getting the  
 20 subpostmaster to have a conversation with Karen  
 21 to find out what we're doing with the losses,  
 22 ultimately could end up as a suspension.  
 23 **Q.** So it's going down a track of misconduct  
 24 potentially --  
 25 **A.** Yes.

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1 **Q.** Yes.  
 2 **A.** I'm not familiar with all the suspended  
 3 sessions, I can't remember all those sort of  
 4 things.  
 5 **Q.** No, that's not necessary for the moment but  
 6 I think we can understand what's happening here:  
 7 a subpostmaster saying, "I'm using the system  
 8 and it is creating losses which are not true  
 9 losses, it's the way the system operating", and  
 10 your Contracts Adviser is saying, "This could  
 11 end up, if they swap out the old processor and  
 12 put in a new one and the losses continue, in  
 13 a conduct or misconduct case", okay, and she's  
 14 saying, "Can we investigate it now, not halfway  
 15 through conduct case".  
 16 **A.** Yeah.  
 17 **Q.** Yes, or when we're into a conduct case. "Can we  
 18 investigate what the cause of the losses  
 19 actually is now, rather than as part of  
 20 a conduct case", yes?  
 21 **A.** Yes. That's my interpretation.  
 22 **Q.** Yes, thank you. Then if we go back to page 4,  
 23 please, and scroll down. Thank you. Just up  
 24 a bit, sorry, a bit more, please, to see Gary's  
 25 reply. That's it. Mr Blackburn replies:

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1 "Karen  
 2 "Fujitsu would not check a replaced  
 3 processor automatically but I don't believe that  
 4 would add any value in this instance.  
 5 "As we discussed last week the most likely  
 6 explanation was/is user error but given the  
 7 calls into NBSC and HSD we should assume this is  
 8 not the root cause at this time.  
 9 However kicking off any other type of  
 10 investigation is dependent on transactional  
 11 evidence of Smartpost suspend creating  
 12 discrepancies? Does Tom have any? I assume he  
 13 believes that Horizon is committing each mail  
 14 item/costs each time that he goes into suspend  
 15 and therefore on multiple occasions?  
 16 "If Tom has specific information such as  
 17 transaction time and values, please send this  
 18 across and I will get Fujitsu to investigate  
 19 immediately. If has no evidence then I'm afraid  
 20 there is nothing for Fujitsu to investigate."  
 21 Then back to page 3, please, Karen's reply:  
 22 "Gary  
 23 I am not sure why Fujitsu would be changing  
 24 the processor if they didn't think there was  
 25 a problem.

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1 "Fujitsu have always had a preventative  
 2 maintenance policy and therefore sometimes will  
 3 swap out kit without actually finding a fault,  
 4 also it generally helps with customer perception  
 5 of the service they have received.  
 6 "I accept in this instance that this policy  
 7 could work against us, but are you suggesting  
 8 that if after swapping the processor, and all  
 9 discrepancies cease that Tom will claim that is  
 10 clear proof of Horizon creating discrepancies?  
 11 I strongly suggest that Tom obtains the  
 12 necessary evidence now, if it is available.  
 13 "I am not trying to be obstructive but at  
 14 present we have nothing to work on."  
 15 Then to the bottom of page 2, please --  
 16 sorry, bottom of page 1. You sent an email, can  
 17 you see this, on 3 July?  
 18 **A.** Yes.  
 19 **Q.** "Gary  
 20 "I have read the recent emails on the above  
 21 and considered the information I am concerned if  
 22 we swap the processor now and the errors stop  
 23 this could lead to (i) a claim that Horizon has  
 24 problems in its accuracy and fuel some of the  
 25 recent press articles and (ii) the

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1 "Having spoken to Tom today, once the new  
 2 processor is installed he is going to do a BP  
 3 rollover ..."  
 4 Can you remember what BP rollovers were?  
 5 **A.** I can't remember what "BP" is now. Branch --  
 6 no, sorry, it's gone. BP?  
 7 **Q.** Was it to do with balancing?  
 8 **A.** Yes, is it the rollover to the next period?  
 9 I think? I can't remember what "BP" stands for,  
 10 just off the top of my head.  
 11 **Q.** Okay.  
 12 "... and then keep a tally manually of every  
 13 Smartpost item to check against Horizon. This  
 14 however won't help with anything that has gone  
 15 previously."  
 16 So he, the subpostmaster, once the new  
 17 processor is in, says he is going to keep  
 18 a manual tally, handwritten tally, of every  
 19 Smartpost item to check against Horizon but  
 20 that's not going to help with the past. You can  
 21 see that you're now copied in to this email  
 22 chain, can you see that at the top?  
 23 **A.** Yes.  
 24 **Q.** Then if we go to the foot of page 2, please.  
 25 Mr Blackburn replies:

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1 [subpostmaster] will claim that all previous  
 2 errors are down to Horizon and we have no way to  
 3 disprove this if everything is resolved when the  
 4 new processor is installed.  
 5 "Point (i) above would also concern me as  
 6 I have no doubt that this individual is not the  
 7 only one that uses Smartpost in this way so we  
 8 could end up with other claims in respect of  
 9 this issue where we have insisted that the  
 10 [subpostmaster] makes the loss good."  
 11 Then over the page:  
 12 "I would prefer a more staged approach be  
 13 taken to this issue where we try to identify the  
 14 problem by a method that will eliminate  
 15 potentially different scenarios -- I am not sure  
 16 how easy or difficult this would be to do but if  
 17 this [subpostmaster] was for example removing  
 18 money from the till and he stopped doing this  
 19 when the processor is removed we have not proved  
 20 it was the processor that was at fault all we  
 21 have stopped is money going missing.  
 22 "I think we need to think this one through  
 23 carefully and the [subpostmaster] should be  
 24 providing evidence to support his claims which  
 25 can be investigated or we change pieces of

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1 equipment.

2 "If you wish to discuss please give me

3 a ring."

4 Just go back to the foot of page 1, please.

5 Thank you. You say that you're concerned that,

6 if the processor is changed and the errors stop,

7 this could lead to a claim that Horizon has

8 problems in its accuracy and fuel some of the

9 recent press articles. Is that a written

10 expression of what you described earlier,

11 a desire on the part of the Post Office to

12 protect the Post Office brand and Horizon in

13 particular?

14 **A.** I guess it could be, yes. I didn't really think

15 of it in that light until you've mentioned it.

16 **Q.** Were you operating on a presumption here that

17 the alleged debt was owed until it was disproved

18 by the subpostmaster?

19 **A.** I think I was working on the presumption that we

20 needed to understand what had happened in the

21 office and take an approach which perhaps

22 eliminated things as we went through and didn't

23 cause us more problems than they solved.

24 **Q.** You understood, I think, in the context of this

25 exchange, that Mr Hedges may have been suspended

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1 checking the processor might be one of those

2 stages.

3 **Q.** Why would you be concerned that swapping the

4 processor, might lead to the errors stopping?

5 **A.** Well, swap -- the -- swapping the processor

6 doesn't necessarily mean that if the errors

7 stopped it was down to the processor, I think

8 was my train -- will have been my train of

9 thought there.

10 **Q.** That he could have been stealing the money and

11 had then stopped stealing the money at the point

12 of the change of the processor?

13 **A.** Well, that something else could have been going

14 on that wasn't down to the processor.

15 **Q.** Was him stealing the money one of those other

16 things that could have been going on, in your

17 mind?

18 **A.** I -- you know, this is back in 2009, so I can't

19 clearly remember what my mind was thinking at

20 the time but I would imagine that's one of the

21 options that would have been going through my

22 mind.

23 **Q.** Just go over the page, please. In this

24 continuation of your email, in the third line,

25 you say:

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1 in connection with the conduct case, arising

2 from the losses that he believed were caused by

3 the system?

4 **A.** Yes. That's ultimately where it could have

5 gone.

6 **Q.** Even more ultimately, Mr Hedges could have been

7 dismissed at the conclusion of that conduct

8 case?

9 **A.** That is one of the possible outcomes of

10 a conduct case, depending on the -- what

11 investigations come to light.

12 **Q.** He could have been required to repay the

13 losses --

14 **A.** Correct.

15 **Q.** -- and could conceivably have been subject to

16 a prosecution?

17 **A.** That is a possibility but not something that was

18 in my remit.

19 **Q.** Given the information that you had been given

20 about the problem that Mr Hedges alleged, why

21 would you not wish to investigate whether in

22 fact the processor was reliable or not?

23 **A.** Well, I think that's what I was trying to say

24 there in the point that I make, is that I think

25 we needed to take a staged approach of which

62

1 "... if this subpostmaster was for example

2 removing money from the till and he stopped

3 doing this when the processor is removed we have

4 not proved it was the processor that was at

5 fault all we have stopped is money going

6 missing."

7 **A.** Yes --

8 **Q.** It seems to be that --

9 **A.** -- so it was clearly in my mind at the time.

10 **Q.** You refer here to the "recent press articles".

11 **A.** Yes.

12 **Q.** What were the recent press articles?

13 **A.** Crikey, I honestly don't recall, back in 2009,

14 what the press articles were. I know -- I think

15 it was computing magazine had done several

16 articles around --

17 **Q.** *Computer Weekly*?

18 **A.** I can't remember the title of it. But they'd

19 done articles on Horizon, and -- I'm sorry,

20 I just can't remember which article I'm

21 referring to there.

22 **Q.** Wouldn't the existence of articles complaining

23 of other faults with Horizon be more of a reason

24 to investigate the alleged fault fully rather

25 than less of a reason?

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1 A. Yeah, I don't think I'm suggesting we don't  
 2 investigate it fully but I was suggesting we  
 3 take a more staged approach to the  
 4 investigation.  
 5 Q. What were those stages?  
 6 A. Well, I think it was trying to -- what probably  
 7 was going through my mind at the time was trying  
 8 to eliminate different sources that could have  
 9 created the problem, of which one would be no  
 10 doubt the processor.  
 11 Q. How could the subpostmaster produce evidence  
 12 that Horizon was the cause of the alleged loss?  
 13 A. I honestly don't know.  
 14 Q. Just go back to the foot of the first page,  
 15 please.  
 16 A. I think it was in the text a little bit earlier,  
 17 there was comment about the subpostmaster  
 18 providing evidence.  
 19 Q. What evidence did you think he could provide?  
 20 A. I wasn't sure.  
 21 Q. I mean, it seems, again, that your decision  
 22 making is coloured by the possibility of  
 23 undermining the belief in the integrity of  
 24 Horizon; would you agree?  
 25 A. I'm not sure, I'm not sure it was. But I was

65

1 equipment.  
 2 Q. I'm thinking of how, if you didn't know  
 3 a subpostmaster could prove that what he was  
 4 saying was true or that what he was saying could  
 5 be tested, to whom would you turn to say, "We've  
 6 got a subpostmaster who alleges the following.  
 7 He alleges that when he uses Smartpost and  
 8 presses the screen in this sequence, losses that  
 9 are phantom losses are created" --  
 10 A. Yeah.  
 11 Q. -- "please tell me what questions I need to ask  
 12 him. Please tell me what data the system will  
 13 produce to prove or disprove that which he  
 14 says?" Who would you turn to?  
 15 A. I'd be looking towards the experts on Horizon.  
 16 Q. Who were they?  
 17 A. Well, I can't remember what you term  
 18 Mr Blackburn's job as but I think there was  
 19 a team based up in the Rotherham area that were  
 20 sort of -- would sort of link the conduit.  
 21 Q. I mean, his job title is on page 4.  
 22 A. Yeah, I find job titles a little confusing.  
 23 Q. Well, on that I think we can at least agree.  
 24 Page 4 in the middle, please, and scroll down,  
 25 please. "Live Service and Business Continuity

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1 trying to just be more constructive in the way  
 2 we -- or methodical in the way we investigated  
 3 it.  
 4 Q. So what did you think would happen --  
 5 A. Hopefully --  
 6 Q. -- as a result of your email?  
 7 A. Hopefully we'd get to the bottom of whatever was  
 8 causing the problem.  
 9 Q. How? If the subpostmaster couldn't produce  
 10 evidence that Horizon was at fault, all he could  
 11 say is that "I know that when I used the  
 12 Smartpost system in this way, in this sequence,  
 13 it causes losses on my account which are not  
 14 true losses".  
 15 A. Yeah. I didn't know whether something could be  
 16 printed at that point in the -- from Horizon.  
 17 Q. What was the route for a link between you and  
 18 your team, who were responsible for making  
 19 decisions and giving advice about issues such as  
 20 this, and those responsible for the intricacies  
 21 of the operation of the Horizon system?  
 22 A. What, you mean how we got information?  
 23 Q. Yes.  
 24 A. By the likes of people like Gary Blackburn. The  
 25 teams that were responsible for the Horizon

66

1 Manager" in Barnsley?  
 2 A. Yeah.  
 3 Q. That doesn't tell you what he does and whether  
 4 he knows anything about Horizon, correct?  
 5 A. No, it doesn't tell me anything.  
 6 Q. But who, broadening it out from these narrow  
 7 circumstances, would you and your team turn to  
 8 for technical advice, where you'd got a case  
 9 just like this: postmaster says X, Y and Z; we  
 10 need to test whether X, Y and Z are true, does  
 11 Horizon operate in this way? Is it conceivable  
 12 that the subpostmaster is correct? What data is  
 13 produced by Horizon? What back office data is  
 14 kept by Post Office and Fujitsu to help us  
 15 navigate our way through these allegations?  
 16 A. I do believe that Gary Blackburn, this has his  
 17 continuity -- Horizon continuity, business  
 18 system continuity, and he had a team of people  
 19 in Barnsley or Rotherham that dealt with this  
 20 and would be, in my view, what you would class  
 21 as the expert domain.  
 22 Q. So you would expect Mr Blackburn to be able to  
 23 say, "Look, we can investigate this as follows:  
 24 by going back to Fujitsu or by the data that  
 25 we've already got to see whether what Tom says

68

1 is true or not"?

2 **A.** I would be expecting somebody with -- whether it  
3 was Mr Blackburn, but Mr Blackburn to know how  
4 it could be investigated.

5 **Q.** Thank you. That can come down.

6 Can we turn paragraph 90 of your witness  
7 statement, which is on page 29. It's at the  
8 foot of the page. You say:

9 "I have reflected on whether I noticed any  
10 increase in subpostmaster losses or an increase  
11 in the number of write-offs agreed following the  
12 introduction of Horizon. I do not recall  
13 an increase in losses following the introduction  
14 of Horizon, but once the reliability of the  
15 system began to be questioned I recall that  
16 there were more cases where Horizon was blamed  
17 for the loss, and that this was cited as a way  
18 to challenge debts. I don't recall that there  
19 was an increase in write offs by my team."

20 The Inquiry has seen evidence -- I'll give  
21 the reference, it's NFSP00000515 at page 15 --  
22 that suggests that, by March 2001, there was  
23 about £10 million in suspense accounts, as  
24 opposed to about £2 million 18 months before.  
25 So in an 18-month period, the amount in suspense

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1 sort of hesitating around 2011/2012, but I don't  
2 know with any certainty.

3 **Q.** You say, "this was cited as a way to challenge  
4 debt". Cited by whom?

5 **A.** By the postmaster.

6 **Q.** The way that sentence reads suggests that you  
7 believe it wasn't a genuine belief that Horizon  
8 was to blame for the debt. What you're saying  
9 here --

10 **A.** On the part of the claimant, you mean?

11 **Q.** Yes.

12 **A.** Well, at that time I had no grounds on which to  
13 believe that Horizon was -- there was an issue  
14 with Horizon.

15 **Q.** So what we should read this sentence as meaning  
16 is that you believed that subpostmasters were  
17 falsely claiming that Horizon was responsible,  
18 and they were doing so because of publicity and  
19 that this was just a mechanism or a vehicle for  
20 explaining way debts?

21 **A.** I don't think that's probably what was going  
22 through my mind when I wrote that sentence.

23 **Q.** Tell us what it means, then.

24 **A.** Well, I can understand exactly why you've taken  
25 that interpretation.

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1 accounts had increased from £2 million to  
2 £10 million, covering the period of the  
3 introduction of Horizon.

4 Is it your evidence that you were not aware  
5 of such an increase in claimed discrepancies or  
6 losses after the introduction of Horizon?

7 **A.** I wasn't aware of those -- the figures that  
8 you've just quoted.

9 **Q.** Were you aware of an increased use, without  
10 reference to the figures, in the use of the  
11 suspense account after the introduction of  
12 Horizon?

13 **A.** No.

14 **Q.** You say here:

15 "Once the reliability of the system began to  
16 be questioned I recall there were more cases  
17 where Horizon was blamed for the loss, and that  
18 this was cited as a way to challenge debts."

19 What period are you referring to there,  
20 "once the reliability of the system began to be  
21 questioned"?

22 **A.** I think this was after the JSFA -- and I can't  
23 remember when they -- that body was created.  
24 But that started to pick up momentum. So I'm  
25 not sure exactly the time period on this. I'm

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1 **Q.** If my interpretation is incorrect, what is the  
2 correct interpretation?

3 **A.** Well, I -- all I was trying to say, in what  
4 perhaps is not a very well worded sentence, was  
5 that the instances started to increase for  
6 Horizon being sort of blamed for losses.  
7 Whether that was -- I didn't want to indicate  
8 that the subpostmaster was doing -- not telling  
9 the truth. That wasn't the purpose of what  
10 I was trying to say.

11 **Q.** It's the use of your words "this was cited as  
12 a way to challenge debts".

13 **A.** Yes, and I understand what you're picking up on  
14 there.

15 **Q.** Well, I'm picking up on it because the words are  
16 there in black and white.

17 **A.** Yeah, I know and what I'm saying that perhaps  
18 it's not the best worded sentence I've ever put  
19 together.

20 **Q.** Isn't it revelatory of your true belief, and  
21 those around you's beliefs also, that this is  
22 just subpostmasters jumping on a bandwagon:  
23 there's been some publicity about Horizon having  
24 faults and subpostmasters were being  
25 opportunists in blaming the system for their

72

1 debts?

2 **A.** I don't think I'd have used the term

3 "bandwagon", but --

4 **Q.** Well, some other similar expression.

5 **A.** Yeah, okay. I mean to say, at that time, yes,

6 perhaps that was the way, you know, I would be

7 thinking.

8 **Q.** Can we turn, please, to paragraph 103.2 of your

9 witness statement, which is on page 32.

10 I should read paragraph 102 first. You're

11 dealing here with the suspension and termination

12 process.

13 **A.** Okay.

14 **Q.** You say:

15 "When a shortage was identified at an audit,

16 the lead auditor would telephone the Contracts

17 Adviser to discuss the audit findings. The

18 Contracts Adviser would speak to the

19 subpostmaster to discuss the reasons for the

20 shortage and might also, where appropriate, have

21 contacted other teams. The Contract Adviser

22 would gather as much information as possible.

23 "Factors considered ..."

24 I think this is factors considered in

25 whether to suspend.

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1 the source of the risk was the subpostmaster,

2 him or herself on the one hand, and his staff on

3 the other, correct?

4 **A.** Yes.

5 **Q.** In a case where the cause of the loss could not

6 established, was it just assumed to be the

7 subpostmaster's fault?

8 **A.** Well, initially, it would have to be, yes.

9 **Q.** Well, initially and for always?

10 **A.** Well, subject to any -- if the -- if it ended

11 up as suspension there would be investigations

12 to try to establish what had gone on.

13 **Q.** If there was an investigation that tried to

14 establish what had gone on with the

15 subpostmaster saying, "I'm not responsible for

16 that loss, it's a system-generated loss", and he

17 could produce no evidence of that, what course

18 would the investigation then take?

19 **A.** I would imagine we'd look to the expert domain

20 to try to see if there was an issue.

21 **Q.** Can we turn to the debt recovery process,

22 please, and you refer at paragraph 19 of your

23 witness statement -- and there's no need to

24 display it at the moment -- to your role, which

25 was to consider what was being proposed -- this

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1 **A.** Yes.

2 **Q.** "... would include the following (this is not

3 a definitive list) ..."

4 It's the second one, 103.2:

5 "Source of risk, ie subpostmaster or the

6 staff employed at the branch ..."

7 **A.** Yeah.

8 **Q.** The Inquiry has heard a good deal of evidence

9 where the support desks, including the third

10 line of support, the SSC, could not identify the

11 source of discrepancies and has heard evidence

12 that subpostmasters would not know themselves

13 the cause of discrepancies. In circumstances

14 where the cause of a discrepancy, a shortfall,

15 was not known, what would be considered to be

16 the source of the risk?

17 **A.** Well, it couldn't be identified if it wasn't

18 known.

19 **Q.** How would the source be attributed as between

20 the subpostmaster and staff employed at their

21 branch?

22 **A.** Well, the subpostmaster was ultimately

23 responsible for the actions of their staff.

24 **Q.** This tends to suggest, this paragraph, that

25 there was a distinction drawn between whether

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1 is on the policy front -- from a contractual

2 perspective and suggest improvements to existing

3 working practices.

4 So this is your involvement in the

5 development of policy, so far as debt recovery

6 is concerned.

7 If we go forward to paragraph 47, please,

8 which is on page 19, you say:

9 "I did author one document, Operators in

10 Service Debt [and you give the reference]. My

11 recollection is that the reason I took on the

12 role of author of this particular iteration of

13 the Postmasters' In Service Debt policy was

14 because the previous owner and author were no

15 longer with [Post Office] and the document

16 needed to be update to reflect working

17 practices."

18 Can we look, please, at POL00088579. We can

19 see that the title of the document is at the top

20 of the page. We can see authorship is given to

21 you.

22 **A.** Mm-hm.

23 **Q.** If we scroll down, we can see the first

24 iteration of the policy seems to be version 1 in

25 September 2013; can you see that?

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1 A. Yes.

2 Q. We're now dealing, I think, with a February 2019  
3 version --

4 A. Yeah.

5 Q. -- so in the year that you left?

6 A. Yes.

7 Q. If we go to page 5, please, and scroll down, and  
8 scroll down.

9 Does this set out the decision-making levels  
10 and repayment process for subpostmasters in  
11 debt?

12 A. Yeah, that's -- 6.4.6, I believe is the people  
13 who had the authority to agree repayment plans  
14 over these different terms.

15 Q. Was it part of the policy that negligence or  
16 carelessness on the part of the subpostmaster  
17 had to be established before they could be said  
18 to owe a debt?

19 A. No, I don't think that is in the policy.

20 Q. It's not, no.

21 A. No.

22 Q. Why is that?

23 A. Very poor excuse but I don't think it was ever  
24 in the policy and, basically, the work I did on  
25 this was to update the policy to reflect the

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1 A. I think --

2 Q. -- to trade off a mistaken belief?

3 A. I think so.

4 Q. How far did that trading extend, trading off  
5 that belief? Was it only in relation to debt  
6 recovery or did it extend to conduct  
7 investigations, suspensions and terminations?

8 A. I think probably more at the fore in debt  
9 recovery.

10 Q. Can you explain why you think the belief was  
11 more at the fore with debt recovery?

12 A. Well, I think the terminology was that, you  
13 know, the contract was never sort of quoted as  
14 it is written. It was always paraphrased as  
15 "the subpostmaster is responsible for the debt".

16 Q. Was that in the knowledge, though, that that's  
17 not, in fact, what the contract said?

18 A. Well, I think some people had that knowledge;  
19 others probably didn't.

20 Q. As the head of the team with a national  
21 responsibility for your area of the country, you  
22 had that belief and that knowledge?

23 A. I knew the wording of the contract, yes.

24 Q. What prevented you from speaking up to say,  
25 "Hold on, hold on, we've got hundreds if not

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1 actual working practices that were going on at  
2 the time because the previous policy had been  
3 superseded in different areas.

4 Q. So, by that answer, do I understand you to mean  
5 that, although the subpostmaster contract meant  
6 that a debt was only owed if negligence or  
7 carelessness on the part of the subpostmaster  
8 could be established, that was never, in fact,  
9 translated through to the debt recovery process?

10 A. I don't believe those words are in that process  
11 but, like I say, I don't believe they were ever  
12 in the -- in the iteration that I amended  
13 either.

14 Q. So is that again because of the prevailing  
15 beliefs and norms in the Post Office, that all  
16 loss was the responsibility of the  
17 subpostmaster --

18 A. Yes.

19 Q. -- and, again, because the mention of the  
20 existence of the contract was thought to create  
21 belief in the subpostmaster that all debt was  
22 his responsibility?

23 A. Yes.

24 Q. Was that one of the things that you felt  
25 challenging in an ethical or moral way --

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1 thousands of subpostmasters on contracts here  
2 that have, as a trigger for their liability,  
3 a certain word. We're trading off -- we're  
4 taking enforcement action, we're bringing debt  
5 proceedings on the basis of a mistaken belief,  
6 knowingly, that they may have misunderstood,  
7 they may not have known the true position"?  
8 What prevented you from speaking up?

9 A. I don't really know. I think some of the -- my  
10 views sort developed over time where perhaps  
11 I just got more concerned about this or more  
12 worried about it. It wasn't -- I don't know  
13 what stopped me speaking up; I'll be quite  
14 honest with you.

15 Q. What do you think would have happened if you'd  
16 spoken up?

17 A. Probably not a lot.

18 Q. Why do you think not a lot would have happened?

19 A. Well, I guess it wouldn't be the sort of things  
20 people would want to hear.

21 Q. Why wouldn't they want to hear it?

22 A. Because it was going against the sort of  
23 practice that had been going on for a while or  
24 a good number of years.

25 Q. Were postmasters advised to take legal advice

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1 before entering into either the subpostmaster  
 2 contract or the NT contract?  
 3 **A.** I don't think so but I can't now honestly  
 4 remember.  
 5 **Q.** Can we look, please, at POL00021748. This is  
 6 a series of questions that Second Sight -- and  
 7 you remember what Second Sight was -- posed to  
 8 the Post Office and the attribution of them in  
 9 the right-hand column of the questions to  
 10 various experts within the Post Office business.  
 11 Could we turn to page 14 and 15, please.  
 12 Can you see the heading is "The contract between  
 13 the Post Office and Subpostmasters"?

14 **A.** Yes.  
 15 **Q.** Second Sight asked:  
 16 "Please provide full details of the  
 17 following:  
 18 "the measures Post Office takes in order to  
 19 reduce the risk that incoming subpostmasters,  
 20 who take over an existing branch and its staff,  
 21 may be inheriting employees who have been found  
 22 to be, or are suspected of having been,  
 23 incompetent or dishonest. In this context, was  
 24 there, or is there now, any competency and  
 25 integrity verification, performance appraisal,

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1 contract."  
 2 That's the standard contract.  
 3 **A.** Yeah.  
 4 **Q.** "This appears to be contrary to best practice  
 5 procedures. For example, the British Franchise  
 6 Association recommends that independent legal  
 7 advice should always be taken prior to signing  
 8 a franchise agreement. Please provide full  
 9 details as to why Post Office does not comply  
 10 with this best practice recommendation?"  
 11 You regarded the contract as unfair.  
 12 **A.** Well, yes, weighted in one direction, yeah.  
 13 **Q.** Did that play a part in not including, as part  
 14 of the onboarding process, suggestions to  
 15 subpostmasters that they take legal advice about  
 16 its terms?  
 17 **A.** What, my view of the contract?  
 18 **Q.** Yes.  
 19 **A.** No.  
 20 **Q.** What were the reasons, then, that what was  
 21 described by Second Sight as best practice was  
 22 not followed?  
 23 **A.** I honestly couldn't tell you. I mean to say,  
 24 the onboarding process was very similar for  
 25 many, many years, that Post Office Limited used

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1 or formal disciplinary/warning process whereby  
 2 snout going subpostmasters and Post Office's own  
 3 Line Managers could warn incoming Subpostmasters  
 4 where questions had been raised?"  
 5 What was the answer to that?  
 6 **A.** I know when we were talking about the contract  
 7 in an application interview, the postmaster  
 8 was -- it was explained to the postmaster about  
 9 if they had -- if they take on staff, the staff  
 10 were their employees. If there was an existing  
 11 branch they were moving into and there were  
 12 staff already there, they were perhaps changing  
 13 the terms of, or something like that, that they  
 14 should take advice on TUPE, the Transfer of  
 15 Engagement legislation.  
 16 The staff were -- I mean to say, you know,  
 17 I don't think that it was ever said you should  
 18 talk to the -- you know, what we suggested you  
 19 talk to the outgoing postmaster about, in  
 20 respect of the staff.  
 21 **Q.** Can we go over the page to page 15, please, and  
 22 read 12.4:  
 23 "We understand that the Post Office does not  
 24 recommend that its would-be Subpostmasters take  
 25 legal advice ... prior to entering into that

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1 to use. I don't know why there wasn't anything  
 2 explicitly mentioned as part of that process,  
 3 when somebody is appointed, that you take legal  
 4 advice on the contract. I know it was  
 5 an obligation under Network Transformation that  
 6 the appointed individual had to, or the  
 7 appointed entity had to, sign the contract.  
 8 I know that was a requirement.  
 9 **Q.** Can we turn, please, to POL00085836. This is  
 10 a two-page email -- if we read from the foot of  
 11 the page, please -- from Angela van den Bogerd,  
 12 who was the Head of Network Services at this  
 13 time. On 1 May 2012, she says to Craig Tuthill,  
 14 who, I think, was the National Services Support  
 15 Manager:  
 16 "Craig  
 17 "I met with Simon Baker today -- he's been  
 18 asked by Alice Perkins to find a way of  
 19 demonstrating that the Horizon system is robust  
 20 ..."  
 21 Just stopping there. Would that sentence  
 22 fit in with the sort of ethos and beliefs of the  
 23 organisation that you described earlier, that  
 24 the imperative was always to approve that  
 25 Horizon was robust, rather than having an open

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1 mind as to whether it was or it wasn't?  
 2 **A.** The organisation told us it was robust.  
 3 **Q.** Continuing:  
 4 "... and not subject to 'glitches' as  
 5 claimed by the JFSA former [subpostmasters].  
 6 An MP is spearheading their campaign and in  
 7 particular the *Hamilton (2003)* case. The MP is  
 8 to visit it model office in a week or so and  
 9 Simon would like us to provide an easy to  
 10 understand walk through document of our  
 11 appointments and training approach -- this is  
 12 where you come in, no doubt ably supported by  
 13 John [I think that's you] and/or Lin and Sue."  
 14 **A.** Mm-hm.  
 15 **Q.** Then over the page:  
 16 "I attach a note [and we're going to look at  
 17 that in a moment] that I provided to Sue a few  
 18 weeks back so she could explain to Alice what  
 19 our approach is. Would you use this as your  
 20 starting point, amending and updating as you see  
 21 fit. Would you also embed the supporting  
 22 documents -- eg the training offer document Sue  
 23 recently pulled together.  
 24 "The claims from the JFSA former agents  
 25 include that they were not aware of their

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1 remember this document at all and, I mean to  
 2 say, I think it's entitled "Cash Management"?  
 3 **Q.** Yes.  
 4 **A.** So if it's -- I am not sure.  
 5 **Q.** If we go back to page 1, just so you can look at  
 6 it.  
 7 **A.** Yeah. Are you -- is it the thought that this  
 8 was part of the application process?  
 9 **Q.** That's what I'm asking -- that's what I'm trying  
 10 to investigate.  
 11 **A.** Well, I don't think it was because, as part of  
 12 the application process, as part of the  
 13 interview, the subpostmaster would be introduced  
 14 to a number of terms from the contract, okay,  
 15 and I think there was a checklist that was used  
 16 by Contract Advisers to go through that  
 17 information. That document there or this  
 18 document here, I do not recall at all. I don't  
 19 think that was part of it.  
 20 **Q.** If you go over the page?  
 21 **A.** Go back to page 4 --  
 22 **Q.** If we just go back to page 1, so you can see  
 23 a bit more context, in fairness to you.  
 24 **A.** Okay.  
 25 **Q.** Sorry, the next page. Thank you. Just have

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1 contractual obligations in terms of making good  
 2 losses. What we need to do is detail the points  
 3 at which they were advised of this -- in the  
 4 Contracts Advisers interview script; the  
 5 declaration that they make on transfer and the  
 6 SPSO contract they signed; I'll send you what  
 7 information I have", et cetera, et cetera.  
 8 Then if we go back to the first page,  
 9 please. Mr Tuthill says:  
 10 "To see the updated document with input for  
 11 Sue and John."  
 12 At the moment, I can't see any evidence that  
 13 you, who are a copy-ee to this email, provided  
 14 any additional input. But let's look at the  
 15 document that was attached.  
 16 **A.** Okay.  
 17 **Q.** That's POL00085875. Can we go forwards, please,  
 18 to page 4. Do you understand this is something  
 19 that was shown to subpostmasters?  
 20 **A.** I honestly don't recollect this document at all  
 21 and when you say "shown to subpostmasters",  
 22 where?  
 23 **Q.** At the point at which they are either about to  
 24 be recruited or have been recruited?  
 25 **A.** I wasn't aware that was the case. I don't

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1 a look. I mean, the question/hypothetical at  
 2 the top, that's sort of a lecture on why cash  
 3 management is important --  
 4 **A.** Yeah.  
 5 **Q.** -- isn't it?  
 6 **A.** Well, I think -- I mean to say, cash management  
 7 was always important, primarily because,  
 8 obviously, there was a cost of funding the  
 9 network with cash and, also, you know, there was  
 10 a potential risk, if you're holding excess cash  
 11 and anything was -- you know, if the office was  
 12 to be attacked. And I know there was  
 13 a requirement to, you know, daily declare your  
 14 cash holdings because I think that helped decide  
 15 how much cash the branch would need, for cash  
 16 deliveries and things like that.  
 17 **Q.** You would say, I think, summarising, that this  
 18 document is not really addressed at the issue  
 19 that I'm asking about, which is informing  
 20 subpostmasters of their liabilities and  
 21 responsibilities, contractual obligations under  
 22 the subpostmaster contract. This is addressed  
 23 to a different issue?  
 24 **A.** This is not -- I feel 100 per cent certain this  
 25 was not part of the application process when we

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1 were interviewing an applicant for a vacancy in  
2 the network.

3 **Q.** Was the term of the contract that I drew your  
4 attention to earlier, with the trigger for  
5 liability of negligence and carelessness,  
6 et cetera, specifically drawn to subpostmasters'  
7 attention, to say that's the fulcrum upon which  
8 your reliability turns?

9 **A.** At the application interview, when they were  
10 going through the contractual clauses, there  
11 was -- that would be one of the clauses that is  
12 explained to them, and I think the terminology  
13 that we'd been using today, "careless, error or  
14 negligence", was actually in the text.  
15 Certainly, when we sent out with -- I think it  
16 was the interview to -- the invite to interview,  
17 there was a written document that went out with  
18 that letter that went through different clauses  
19 of the contract that we'd brought to applicants'  
20 attention.

21 **MR BEER:** Thank you.

22 Sir, on that note, can we break now until  
23 1.30, please?

24 **SIR WYN WILLIAMS:** Yes, yes, that's fine.

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

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1 "... from when ..."

2 You say, "Well ..."

3 She says:

4 "Has it ever been adequate?"

5 Then you say:

6 "Well I think it went through, the problem  
7 is, and I don't know when it changed, and that's  
8 not me avoiding the bullet, but I don't know  
9 when it changed, but it seemed to go down to  
10 a couple of days which was predominantly sales  
11 focused."

12 What were your concerns about the adequacy  
13 of the training in relation to Horizon?

14 **A.** I think it will have been around the fact that  
15 how you can help -- can train newly appointed  
16 subpostmasters or subpostmasters, any  
17 subpostmaster, into how to interrogate, if there  
18 is -- if they have a discrepancy or something  
19 like that, what steps they could take -- what  
20 they could look at, how they could do that, and  
21 the sort of perhaps tips/help/assistance, in  
22 that sort of area.

23 **Q.** Okay, that's, in fact, what you go on to say.  
24 You say here that it was sales focused or  
25 predominantly sales focused. By that, do you

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1 (12.29 pm)

2 (The Short Adjournment)

3 (1.30 pm)

4 **MR BEER:** Good afternoon, sir, can you see and hear  
5 me?

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

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

8 Good afternoon, Mr Breeden.

9 **A.** Good afternoon.

10 **Q.** Can we turn, please, to POL00006671. This is  
11 your attendance at the Womble Bond Dickinson  
12 offices on the 19 January 2018 again. Can we  
13 turn to page 35, please. You'll see at the top  
14 of the page the solicitor is asking you to  
15 address any weaknesses in Horizon. You ask,  
16 second paragraph:

17 "What, weaknesses in the Horizon system?"

18 She says, "Yeah".

19 You say:

20 "I have got two things I probably would say  
21 about that from a personal perspective.

22 Firstly, I don't think the training that we  
23 provide, have been providing of late is  
24 adequate."

25 She says:

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1 mean it was concentrating on training  
2 subpostmasters to sell product?

3 **A.** Yeah, I -- it was sort of like upselling of  
4 products, you know, as opposed to perhaps  
5 selling a First Class stamp, could you sell  
6 a Special Delivery service, dependent on the  
7 questions that you should ask and the responses  
8 that you were getting. But my sort of  
9 simplistic belief was that if you have  
10 confidence in how to manipulate the sales tool,  
11 the equipment, Horizon, that I think the  
12 sales -- you've got to have that first to be  
13 able to do the selling. Yeah? If you  
14 understand where I'm trying to go.

15 **Q.** Yes, and she summarises your answer:

16 "You think they should be given tips on  
17 functionality that does exist?"

18 You say:

19 "Tips on what to check for because you don't  
20 have to give service as a postmaster but you've  
21 got to have some elements of control and I don't  
22 know whether we give enough on how to, what to  
23 look for. You know."

24 She says:

25 "... So do you think that they are provided

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1 with enough information by Horizon to do that  
2 investigation if they needed to and they knew  
3 how to do it, or do you think that something  
4 else should be provided?"

5 You say:

6 "I probably don't know Horizon well enough."

7 Did you know Horizon well enough to be  
8 confident in your judgements in cases where  
9 a subpostmaster was blaming Horizon for  
10 discrepancies and shortfalls?

11 **A.** No. My knowledge of -- I have used Horizon on  
12 counters and stuff like that but, I mean to say,  
13 the number of times that occurred in the  
14 duration of my time with the Post Office was not  
15 many, so I would be very much reliant on people  
16 who are experts in Horizon telling me that's  
17 things were okay.

18 **Q.** Were you one of those managers that helped out  
19 at Christmastime? Was that your interaction  
20 with --

21 **A.** And --

22 **Q.** -- Horizon?

23 **A.** Yeah, sorry, apologies for interrupting. Yes,  
24 I helped out at Christmas and when there was  
25 industrial action.

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1 issue, were you really saying that  
2 subpostmasters weren't told enough about how  
3 Horizon worked and the data that was available  
4 to be recovered or harvested from it to be able,  
5 if they did come across a discrepancy, to assist  
6 those investigating, to pinpoint it?

7 **A.** That, I think, is where I was going, yes.  
8 I mean to say, it's one thing pressing the keys  
9 and doing a transaction but, when there is  
10 an issue that needs to be resolved, how do you  
11 go about doing that? What, you know -- and  
12 I just don't think there was enough training on  
13 that side of Horizon; it was everything about  
14 this is how you do a transaction, as opposed  
15 to -- I'm sure the training would include  
16 balancing and stuff like that but what -- the  
17 nuts and bolts of, you know, the steps to take  
18 when there was a discrepancy just wasn't  
19 included, from my knowledge.

20 **Q.** So it was training, in your view, into how to  
21 work Horizon when it did work --

22 **A.** Yeah.

23 **Q.** -- rather than training about things that might  
24 be done by a subpostmaster, at their end, when  
25 it didn't work?

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1 **Q.** Did you yourself receive any training on  
2 Horizon?

3 **A.** Yes.

4 **Q.** How long did that last?

5 **A.** I think it was about three hours.

6 **Q.** You go on, if we scroll down the page, please:

7 "But I don't think we perhaps give them  
8 enough small screwdrivers and spanners in their  
9 training pack to sort of say, you know, the  
10 checks that I would suggest you do is, you can't  
11 make [them] do it, you know, otherwise we're  
12 going to start blurring the lines between  
13 employed and employees and you say, every month  
14 you must do this, because that's why the  
15 contract is so high level I guess, to maintain  
16 control. But what I think it would be good to  
17 do is give people a pointer of the things that  
18 are there to do, so you know perhaps do you  
19 count the cash every so often, you know or check  
20 this or check that."

21 You're asked:

22 "... do you think those weaknesses that  
23 you've identified really in the training ... is  
24 there another one?"

25 At that point there, dealing with the first

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1 **A.** Yes, I mean to say, if I reflect on the training  
2 I got, it was very much "This is how you do  
3 a transaction", and stuff like that. Now,  
4 I appreciate I was not being trained to be  
5 a subpostmaster but I was being trained to use  
6 the kit and I guess that the office manager  
7 where I went would help out if there was  
8 a discrepancy but there was never anything that  
9 I recall in my training that tells you what to  
10 do if you had an issue.

11 **Q.** To your knowledge, was that connected to the  
12 nature of the contract, ie a contract which was  
13 interpreted as meaning all losses are the  
14 responsibility of subpostmasters, so it didn't  
15 really matter whether we trained them or not or  
16 if the system is not working because it's not  
17 really relevant?

18 **A.** I don't think I ever made that link, I'll be  
19 quite honest with you but, you know, the  
20 contract did say they had -- as a subpostmaster,  
21 you had to make -- maintain control of the  
22 office, irrespective of whether you were there  
23 or not, and I just wonder whether they should  
24 have been given more tools on how to do that.

25 **Q.** You were asked "is there another [thing]?" and

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1 you continue at the foot of the page:  
 2 "Yeah, the other thing that sort of spooks  
 3 me and I don't know how they do this and it only  
 4 relates to something that happened, well, there  
 5 were occurrences last but the people were able,  
 6 staff were able, to put bogus transactions  
 7 through for the want of a better word, and then  
 8 cream money off. There was some incidents with  
 9 Parcelforce products and we are talking about  
 10 not a couple of quid here, these are thousands  
 11 of pounds people have been able to manipulate  
 12 the system to do. So it's almost like, it's  
 13 almost like if you are a computer guy/guyess,  
 14 present company accepted, there is a danger that  
 15 if you're pretty good with a laptop or  
 16 a computer I don't know how much you can look at  
 17 and what you can do with Horizon and that,  
 18 I don't know how well it's bolted down to be  
 19 honest and that's just observations that, you  
 20 know, how can you put a bogus transaction  
 21 through, it just doesn't make sense to me that.  
 22 The system shouldn't allow that to happen so  
 23 that's how they can draw money out."

24 The solicitor says:

25 "... That's helpful."

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1 is, I think it's called Kibworth Beauchamp, it's  
 2 in Leicester somewhere, and a couple of staff  
 3 took the postmaster there for about £35,000 on  
 4 these Parcelforce transactions. There's another  
 5 two branches in Keith's area where the sum of  
 6 money is far greater. Helen Dickinson from the  
 7 Security team was the person who was looking  
 8 into that."

9 The solicitor says that she's seeing Helen  
 10 "next week" and you continue:

11 "But you know, what I can't understand is  
 12 how you can do that, you know, I can understand  
 13 if I was working in a shop, you know, I've got  
 14 to scan stuff, but I wouldn't have thought but  
 15 actually I can make scans up. I can false  
 16 account in some way. It just seemed a bit too  
 17 ... it seems, unless I'm missing something very  
 18 fundamental."

19 Can you tell us more about this branch, one  
 20 of the branches involved, at Kibworth Beauchamp.

21 **A.** No, I mean to say, I accept what's written there  
 22 but I can't remember anything more about that  
 23 particular case.

24 **Q.** You refer to these as "bogus transactions".  
 25 What did you understand to have been bogus?

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1 You said:

2 "It's not if it goes to court."

3 Why did you think what you said was not  
 4 helpful if the case went to court?

5 **A.** I briefly recount the sort of -- this idea of  
 6 bogus transactions because I remember that there  
 7 was a couple of instances which were very  
 8 sizeable sums where something had gone wrong.  
 9 I can't remember the products, I'm afraid.  
 10 I guess -- all I could -- can think, I'm  
 11 thinking about there, is, you know, with the  
 12 business saying that Horizon is accurate,  
 13 et cetera, something like this would not look  
 14 good.

15 **Q.** So, although this is a flaw of a different kind  
 16 you're referring to here, in that it is not what  
 17 the subpostmasters were alleging -- it's  
 18 a system design or operation error that allows  
 19 money to be taken -- you thought it was  
 20 unhelpful to the Post Office's case, if the  
 21 Group Litigation went to court?

22 **A.** Yes, I guess that's what I was thinking.

23 **Q.** You continue to explain what the issue was,  
 24 fifth paragraph in:

25 "Yeah, one of the branches that was involved

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1 **A.** Well, in so much as I don't think there was  
 2 a customer that bought £35,000 worth of  
 3 Parcelforce transactions.

4 **Q.** Where did you get your information from?

5 **A.** What, the information that I referred to here?  
 6 I presume there was some case papers that I was  
 7 copied into or some sort of notification because  
 8 I would imagine the Security team were looking  
 9 at it.

10 **Q.** What was your understanding of how the staff  
 11 member or members had manipulated the system?

12 **A.** I don't think I did ever understand it. I don't  
 13 think I had it explained to me.

14 **Q.** If there were concerns that Horizon was lacking  
 15 in security or could be manipulated for the  
 16 purposes of fraud, in this way, was that ever  
 17 discussed with Fujitsu, to your knowledge?

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

19 **Q.** Had you heard by this time, January 2018, of  
 20 phantom transactions or ghost transactions being  
 21 said to be responsible for discrepancies?

22 **A.** I don't recall those terms.

23 **Q.** You don't recall that language?

24 **A.** No.

25 **Q.** If we scroll down, please, about three

100

1 paragraphs from the bottom where we are now, you  
2 say:

3 "But there's clearly a way of falsifying the  
4 numbers because otherwise we would not have  
5 people telling me that there's £40,000 missing,  
6 I've falsified the cash declarations."

7 Who was telling you that they had falsified  
8 the cash declarations?

9 **A.** I mean to say, in this context, I honestly don't  
10 know, don't know, but there was instances where  
11 cash declarations didn't reflect the cash on  
12 hand in the branch.

13 **Q.** So was this a subpostmaster admitting that they  
14 had stolen £40,000? Is that what you're  
15 referring to here?

16 **A.** I honestly can't remember.

17 **Q.** Was this a case of somebody who was truly  
18 dishonest, admitting that they were falsifying  
19 cash declarations to take £40,000? Can you give  
20 us some context to what you're referring to  
21 here, please?

22 **A.** I really am struggling to give you some context,  
23 I'm afraid, to actually understand where I am in  
24 making that comment.

25 **Q.** You then turn to a different issue, which is the  
101

1 rationale in there and I know when Lin Norbury  
2 was about we used to sort of spend one day  
3 a month just picking some ... rationales at  
4 random just to see what there are supporting  
5 reasons for."

6 Then scroll down, please. Stop there,  
7 please. Three paragraphs from the bottom, on  
8 the page we're looking at. You say:

9 "You know is there anything that we can  
10 learn because all it feels like at the moment it  
11 feels like we are on a massive hamster wheel in  
12 so much as we have got programmes out there that  
13 have got targets to do something. All they want  
14 to do is push as many people through as long as  
15 they are alive they are happy."

16 The solicitor says:

17 "You are not the first person to say that  
18 ..."

19 Was the recruitment imperative to push  
20 people through, irrespective of the quality of  
21 the applicant?

22 **A.** We felt under pressure to push people through  
23 and we used to get a degree of questioning if we  
24 were to fail an applicant.

25 **Q.** The phrase, quite memorable there, "as long as  
103

1 recruitment of subpostmasters. If we can turn,  
2 please, to page 43. If we go to the bottom of  
3 the page, please, last line. You say, last  
4 paragraph:

5 "[There is an] interview to assess the  
6 individual's ability to run to be a postmaster  
7 so there is a number of criteria that ... are  
8 assessed ... If they achieve the passmark, which  
9 is 60, they are then offered the appointment.  
10 Once they get to that stage they are then issued  
11 with a copy of the contract they then have to  
12 sign ..."

13 Over the page:

14 "... It comes back signed, correctly and  
15 hopefully all the supporting [documents] come  
16 back signed properly because that is where the  
17 guarantor [documents] would go ..."

18 You are asked:

19 "So your team does the interviewing. What  
20 is your role ... Do they ever discuss it with  
21 you ..."

22 You say:

23 "Light touch in so much as when time allows  
24 I sometimes read some of the assessments, you  
25 know, because they are meant to put the  
102

1 they are alive they are happy", who is the  
2 "they" in that? Your managers?

3 **A.** Well, whoever we've -- whichever programme is --  
4 we're appointing on behalf of. I think because  
5 there were several sort of tensions in the  
6 system, in so much as with something like  
7 Network Change, if my memory serves me right  
8 here, you could have had a subpostmaster who was  
9 hoping to leave the network with compensation  
10 but that was dependent on a new postmaster being  
11 appointed, and there was a -- perhaps the best  
12 word is a run rate of how many offices that were  
13 to be converted in a set period of time.

14 So I guess that my team, me, if we're not  
15 appointing people, we are putting a little bit  
16 of a spanner in the works.

17 **Q.** You continue:

18 "But the problem is they do not have to deal  
19 with the consequences of the rubbish at the  
20 other end."

21 Was the imperative to recruit irrespective  
22 of merit later used as a justification for the  
23 number of subpostmasters being investigated,  
24 suspended and terminated?

25 **A.** Can you just repeat that one for me?  
104

1 Q. Yes, was the imperative to recruit --  
 2 A. Right yes.  
 3 Q. -- so long as they're alive, the bosses are  
 4 happy, later used as a justification for the  
 5 number of subpostmasters being investigated,  
 6 suspended and terminated?  
 7 A. I don't think it was ever recognised as a reason  
 8 for that, no.  
 9 Q. "The reason why we've got number of  
 10 subpostmasters being investigated suspended and  
 11 terminated is because of our poor recruitment  
 12 approach"; that wasn't ever vocalised?  
 13 A. I think -- I seem to recall some time back there  
 14 was some sort of work done by perhaps the  
 15 Security team or somebody like that, but I think  
 16 it was earlier than 2018, about whether we were  
 17 doing the right number of checks and things like  
 18 that, when we go through the application  
 19 process.  
 20 Q. If we can move on, please, to the issue of the  
 21 support that subpostmasters were provided with.  
 22 This is page 50, please, top paragraph. You  
 23 say:  
 24 "... the theory is the appointment is done,  
 25 the branch goes live. So the Contracts Adviser  
 105

1 What was its function?  
 2 A. Well, they were the first -- my understanding is  
 3 they're the first point of contact for the  
 4 subpostmaster. They had this Knowledge Base of  
 5 how to deal with queries that were arising and  
 6 then if there was something not on the Knowledge  
 7 Base they should be referring that to the  
 8 appropriate team. So, if it was a debt issue  
 9 that wasn't on the Knowledge Base, it should  
 10 have gone to the debt team.  
 11 Q. So in what respect was their knowledge not  
 12 sufficient in the NBSC?  
 13 A. Well, I don't think it was covering all the  
 14 things that were arising in the Network.  
 15 Q. What was the consequences of that?  
 16 A. There was more referrals coming across to,  
 17 probably, my team that weren't appropriate to my  
 18 team.  
 19 Q. You continue:  
 20 "Secondly most other teams that you would  
 21 think should be the first point of to deal with  
 22 some sort of intervention activity do not want  
 23 to talk to subpostmasters so they make it  
 24 a contractual issue by referring it to us."  
 25 Who were the teams that did not want to  
 107

1 will have seen whoever they've interviewed and  
 2 if we make a blank statement that said everyone  
 3 is interviewed they have touched a Contracts  
 4 Adviser somewhere along the line. When that  
 5 branch goes live if there are any issues those  
 6 subpostmasters should go in through the NBSC and  
 7 that should really be dealt with there.  
 8 Anything that comes back out to us should be of  
 9 a contractual nature. That is where it goes  
 10 wrong because we do not have the teams. There  
 11 is two things we do not have. I am not  
 12 convinced the knowledge on the NBSC is good  
 13 enough to deal with everything that crops up or  
 14 it not be in their knowledge base."  
 15 Just stopping there, in what respect was the  
 16 knowledge in the NBSC, in your view, not good  
 17 enough?  
 18 A. I think a comment like that can only be -- I've  
 19 made that on the basis that things were being  
 20 referred to ourselves, "Oh, you need to speak to  
 21 the Contract Adviser about that issue", or  
 22 something like that, when they weren't  
 23 appropriate to come through to the Contract  
 24 Adviser.  
 25 Q. What was the NBSC in your view supposed to do?  
 106

1 speak to subpostmasters, ie the "most other  
 2 teams"?  
 3 A. Well, I think there's an example in there of the  
 4 Property team, that didn't want to speak to  
 5 subpostmasters. Very few people wanted to speak  
 6 to subpostmasters.  
 7 Q. Why?  
 8 A. I don't know. I think there was something about  
 9 us having "contract" in our name that thought  
 10 that, "oh, well, you know, the subpostmaster  
 11 will respond to you, he won't respond to us",  
 12 which is rubbish because, to be honest, if  
 13 everything was running really smooth, we should  
 14 have been out of work, apart from appointing  
 15 people.  
 16 Q. At the paragraph on the foot of the page here,  
 17 about five lines in, you say:  
 18 "... They were almost like little NBSCs and  
 19 I have no doubt varying in quality and ability  
 20 so when you take that out you lose a massive  
 21 level of knowledge and I think there is a desire  
 22 not to want to contact offices because if you  
 23 think about every NT office that was converted  
 24 must have had the appropriate asbestos report in  
 25 place for them to do the work so why is it  
 108

1 an issue now."  
 2 Then you say this:  
 3 "But nobody wants to deal with  
 4 non-conformance or the difficult stuff. That is  
 5 the problem and that is the reason why we get so  
 6 slumped."  
 7 Why did people not want to deal with  
 8 non-conformance issues?  
 9 **A.** Well, I think it was (1) a resourcing issue and,  
 10 "If I can move the problem on to somebody else,  
 11 it's the best thing I can do". Why is this --  
 12 I think the way the business had sort of  
 13 stripped some of its support out to the Network  
 14 as well, didn't help. I don't think they ever  
 15 really replaced that properly.  
 16 **Q.** You say that "that is the reason why we get so  
 17 slumped". What do you mean by "so slumped"?  
 18 **A.** Just so much work.  
 19 **Q.** In the Contracts team?  
 20 **A.** Yeah.  
 21 **Q.** Would the Contracts team deal with things  
 22 through the prism of suspension and termination?  
 23 Were they the levers that they had to pull or  
 24 debt recovery?  
 25 **A.** Well, the Contracts team was responsible for  
 109

1 you say, at the top of the page:  
 2 "Well I guess the group action on the back  
 3 of Second Sight this action is really in my view  
 4 is just Second Sight part two just a different  
 5 horse that is running as Freeths this time as  
 6 opposed to somebody else but I do not think  
 7 Second Sight put it to bed."  
 8 The solicitor:  
 9 "No they did not."  
 10 You:  
 11 "So as a consequence of that you have got  
 12 an open and seeping wound out there and a lot of  
 13 postmasters who have seen or heard that some  
 14 people have gone through a mediation. Some have  
 15 got something out of it but nobody has made  
 16 a fortune out of this and a lot have got nothing  
 17 out of it and I will be quite honest with the  
 18 mediation ... I was involved in it was  
 19 an absolute nightmare."  
 20 You say it was Joy Taylor mediation and you  
 21 give some other details. We'll skip on beyond  
 22 those.  
 23 Go to the foot of this page here. You  
 24 continue, fourth paragraph that's being shown:  
 25 "I did not have any involvement in that  
 111

1 appointments, dealing with any contractual  
 2 issues that occurred in the life-cycle of  
 3 a postmaster.  
 4 **Q.** But did they have any greater knowledge of the  
 5 way Horizon operated than, say, you?  
 6 **A.** I would imagine some of the Contracts team did,  
 7 yes.  
 8 **Q.** But as a system, as a process, were they trained  
 9 up in it or are you referring to some members of  
 10 the team having a bit more knowledge than you?  
 11 **A.** Some members of the team had more knowledge than  
 12 me. We had training on Horizon but these were  
 13 only sort of quite short sessions.  
 14 **Q.** How much of a problem, in your working life, is  
 15 what you're describing on this page here: other  
 16 people within the Post Office not wishing to  
 17 deal with subpostmasters and referring the issue  
 18 to the Contracts team?  
 19 **A.** How much of a problem was it?  
 20 **Q.** Yeah.  
 21 **A.** It was a time consuming problem, yes.  
 22 **Q.** A daily issue?  
 23 **A.** Oh, I would think so, yeah.  
 24 **Q.** If we can go forward to page 57, please. You're  
 25 here dealing with JFSA and the group action and  
 110

1 case. There are a number of people that were  
 2 picked. I imagine probably most of the people  
 3 were ex-Appeals Managers or something like that.  
 4 But she had brought along some guy that was  
 5 really you know I was expecting loads of  
 6 questions around Horizon that was the last thing  
 7 he wanted to know things like the training  
 8 history of the Security Manager and all this  
 9 sort of carry on and you are thinking I do not  
 10 know where this is all going. It was weird it  
 11 was really weird so I do not know whether I had  
 12 a good or a bad experience on mediation I will  
 13 be quite honest with you."  
 14 You continue:  
 15 "I think because we did not kill it there  
 16 and then and it should have been killed there  
 17 and then and we are now in part two and if this  
 18 does not kill it we will end up with part three.  
 19 You know you guys have got a job for life if  
 20 this does not get killed off I will be quite  
 21 honest with you."  
 22 Was Second Sight seen within Post Office  
 23 senior management as an exercise in killing off  
 24 challenges to Horizon integrity?  
 25 **A.** I don't know. I can't answer that question.  
 112

1 Q. Was it seen by you as an exercise in killing off  
2 challenges to Horizon's integrity?  
3 A. Again, I don't think it was, no.  
4 Q. Why do you refer to it in that way here?  
5 A. Why I've used that term, I don't know. I think  
6 it was probably where my head was at that time,  
7 was that, you know, whatever Second Sight were  
8 doing, I was expecting that to sort of finish  
9 whatever -- come to a conclusion that stopped  
10 whatever was going on but, clearly, that didn't,  
11 then the mediation and these things, and it  
12 continued.  
13 Q. "Kill it there and then" or "kill it off" is  
14 a reference to killing the challenge off, isn't  
15 it?  
16 A. I don't think it's killing the challenge off,  
17 it's actually concluding whatever the challenge  
18 was.  
19 Q. Why didn't you say that, that Second Sight  
20 should have been an opportunity to openly  
21 investigate whether there was a problem with  
22 Horizon and come to a proper -- an objective  
23 conclusion rather than it was meant to kill it  
24 off?  
25 A. If I could answer that question I would but

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1 Q. Yes, he did. He wrote a Report in August 2010.  
2 A. Yes, identifying some improvements that could be  
3 made.  
4 Q. Did you play any part in the discussion which  
5 led to the initiation of his report or the  
6 conduct of it?  
7 A. Not that I recall.  
8 Q. Were you aware of any other discussions about  
9 commissioning expert evidence or independent  
10 investigation into the integrity of Horizon?  
11 A. I don't think so.  
12 Q. Had you got concerns in the integrity of the  
13 data that Horizon produced?  
14 A. At that time, no. Well, I had nothing to base  
15 any concerns on. I was continually being told  
16 that Horizon was producing accurate figures and  
17 that it was, like I say, doing so many  
18 transactions a day, a week, a year, and there's  
19 no issues, and that was a communication that was  
20 coming across the build -- the business.  
21 I wasn't advised by any of my superiors that we  
22 have an issue that --  
23 Q. Did you ever consider that there was a pattern  
24 emerging of subpostmasters challenging Horizon  
25 and the data that it produces and that that

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1 I don't know why I've used that terminology.  
2 Q. Well, is it because it reflects the truth? It  
3 was seen -- Second Sight -- as it was supposed  
4 to be an exercise in killing off the challenges  
5 to Horizon?  
6 A. That's not my recollection but I can't remember.  
7 Q. Was that what the Group Litigation was intended  
8 to be for, again to kill off the challenges to  
9 Horizon? It was another opportunity for the  
10 Post Office? Is that how it was seen?  
11 A. I think that was seen as a way of stopping this,  
12 yes.  
13 Q. Were you involved in any discussions about  
14 commissioning an independent review or  
15 an independent expert assessment on whether, in  
16 fact, there were problems with the integrity of  
17 Horizon or the data that it produced?  
18 A. Not that I recall.  
19 Q. Were you aware of -- I was going to call it  
20 an investigation but I won't -- an exercise  
21 conducted by Rod Ismay in 2010?  
22 A. Only in so much as I think there's a document  
23 that I was sent as part of my Rule 9 letter, and  
24 I think -- did he conclude with some sort of  
25 report?

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1 might be a reason to explore whether or not  
2 there was anything in the concerns that they  
3 were raising?  
4 A. Well, you could see more subpostmasters  
5 mentioning issues with Horizon but it wasn't my  
6 place to investigate Horizon.  
7 Q. You tell us in your witness statement -- no need  
8 to turn it up, it's paragraph 149 -- you say:  
9 "From the start of Horizon being called into  
10 question and with the establishment of the JFSA,  
11 the Post Office continued to advise all staff of  
12 the robustness of the Horizon system and how  
13 many transactions were completed by the system.  
14 I had no reason to doubt whether this  
15 information was correct."  
16 A. Yeah.  
17 Q. Who was telling you that?  
18 A. The Corporate Communications Team. What tended  
19 to happen -- if my memory is holding up here --  
20 is that, if something had been on TV about  
21 Horizon or something in the media, then  
22 a communication would be sent out advising all  
23 staff of that -- the wording wasn't as I've got  
24 it in my statement but it was very similar.  
25 Q. You say that that included how many transactions

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1 were completed by the system?  
 2 **A.** Yes, I'm sure --  
 3 **Q.** Do I understand -- I'm sorry, go on.  
 4 **A.** I'm sure it -- I can't remember exactly the  
 5 phrasing but I'm sure it said it either did so  
 6 many transactions a week or so many a year, or  
 7 something like that.  
 8 **Q.** What did you understand that to be communicating  
 9 to you? What was the point, that it did lots of  
 10 transactions?  
 11 **A.** Well, there was -- what I took from that is it  
 12 did all these transactions and there was no  
 13 issues identified from that.  
 14 **Q.** How frequently were these communications?  
 15 **A.** Well, like I say, I think they sort of coincided  
 16 with sort of what I will call -- term as  
 17 significant events occurring, either something  
 18 in the media, some publication somewhere,  
 19 perhaps, you know, the start of GLO, JFSA.  
 20 **Q.** You tell us in your statement that you were  
 21 responsible for deploying processes relating to  
 22 suspensions and terminations and the appeal  
 23 process?  
 24 **A.** Yes.  
 25 **Q.** That was in all of the roles, I think, that you

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1 **Q.** Yes, did they have -- I'll take it in stages.  
 2 Did they have within their remit at the appeals  
 3 stage a brief to carry out investigations into  
 4 the factual accuracy of matters raised by the  
 5 subpostmaster on appeal?  
 6 **A.** Yeah, because what they would have got -- as  
 7 an Appeals Manager, you get all the case papers  
 8 that the manager who made the decision had, so  
 9 they would have sent all of those over but you  
 10 could make -- you would go through all of that  
 11 and you could make subsequent investigations.  
 12 **Q.** What staff, if any, did they have, an Appeals  
 13 Manager --  
 14 **A.** None.  
 15 **Q.** -- to conduct those investigations?  
 16 **A.** They were on their own.  
 17 **Q.** They were on their own?  
 18 **A.** Yeah.  
 19 **Q.** Did, as a matter of fact, Appeals Managers, at  
 20 the appeals stage, conduct investigations of  
 21 their own into the underlying facts?  
 22 **A.** I mean to say, I find that probably difficult to  
 23 answer. Having been an Appeals Manager, I know  
 24 I did but I can't talk for other Appeals  
 25 Managers.

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1 had from 2006 onwards; is that right?  
 2 **A.** Yes.  
 3 **Q.** You, I think, updated an Operating Level  
 4 Agreement which included a process relating to  
 5 appeal?  
 6 **A.** Yes, yes.  
 7 **Q.** What resources and support did Appeals Managers  
 8 have available to them to conduct their own  
 9 investigations?  
 10 **A.** They -- any Appeals Manager would have gone  
 11 through training and they would have been --  
 12 when asked to do their first appeal, they would  
 13 have been buddied up with an experienced Appeals  
 14 Manager so they could discuss -- well, perhaps  
 15 watch the experienced Appeals Manager go through  
 16 the process and then they turn the tables round  
 17 at a later date, and they were able to ask  
 18 questions. My line manager at the time was sort  
 19 of acting as a -- was the sort of point of  
 20 contact for any queries that they had.  
 21 **Q.** What resources did they have to conduct their  
 22 own investigations into the factual accuracy or  
 23 otherwise of what the subpostmaster was saying?  
 24 **A.** When you say "resources", I'm not sure what you  
 25 mean.

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1 **Q.** You had an overarching national responsible for  
 2 Appeals Managers for your area of the country?  
 3 **A.** For the -- yeah, for the -- my responsibility  
 4 was for the allocation of appeals. The actual  
 5 Appeals Managers were managed in their own line  
 6 but I think it was my line manager at the time  
 7 acting as their -- sort of a go-to person if  
 8 they've got any issues.  
 9 **Q.** In your interview, you say that when conducting  
 10 appeals you felt at times as if you were marking  
 11 your own homework. What did you mean by that?  
 12 **A.** I don't know.  
 13 **Q.** To what --  
 14 **A.** Which contact -- in what context -- where has  
 15 that come up?  
 16 **Q.** It's on, I think, page 34.  
 17 **A.** What, of the interview with Womble Bond  
 18 Dickinson?  
 19 **Q.** Yes, POL00006671. I think it's page 34.  
 20 I can't immediately see.  
 21 **A.** I mean to say, just whilst you're just looking  
 22 there, I would never have done any -- I know  
 23 I was an Appeals Manager and trained as  
 24 an Appeals Manager but the number of appeals  
 25 I did when I started managing the team, we were

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1 taken out of the appeals sort of arena, so to  
2 avoid managing your homework. Because one of  
3 the criteria for an Appeals Manager was they  
4 could not have any prior knowledge of the case  
5 or anything like that. So it's got to be  
6 something that's totally new to you and I think  
7 it was decided, even though I only managed half  
8 the country and technically could do an appeal  
9 in the south, that probably didn't look good --  
10 didn't look the right thing to do.

11 **Q.** So, irrespective -- in particular as I can't  
12 find the passage -- your evidence is that you  
13 didn't hear appeals in relation to your own  
14 area; is that right?  
15 **A.** Absolutely. Well, the overlying criteria was  
16 that, if you had any -- an Appeals Manager could  
17 not have any prior knowledge of the case.

18 **Q.** And --

19 **A.** So it can't have touched them in any way,  
20 irrespective either/or.

21 **Q.** Does that mean that you only heard appeals out  
22 of your area?

23 **A.** That would -- for me that would, yes.

24 **Q.** What about the other appeal managers?

25 **A.** Well, the other Appeals Managers wouldn't have  
121

1 that view?

2 **A.** Well, I think it was just, you know, people  
3 would say stuff to you that "I think you've got  
4 it wrong". Yeah.

5 **Q.** Why was it frowned upon?

6 **A.** Well, I guess they -- person who did the initial  
7 work or -- believed they got everything right.

8 **Q.** Was it the original decision maker, then, who  
9 was frowning upon the -- those appellate  
10 authorities that overturned appeals or was it  
11 those more senior in the business who thought  
12 that it wasn't the job of Appeals Managers to  
13 allow appeals?

14 **A.** I think there's probably examples of each.  
15 I couldn't quote you any.

16 **Q.** Did that mean that there was a background  
17 pressure on Appeals Managers not to overturn  
18 lower decisions?

19 **A.** I don't think so but -- well, I never  
20 experienced that personally, as an Appeals  
21 Manager.

22 **Q.** How was this frowning upon expressed to you,  
23 then?

24 **A.** Well, I only say I -- you know, people -- I --  
25 comments were made, "I don't understand how  
123

1 Contract Advisers working to them, but they --  
2 the criteria that would apply is they had no  
3 knowledge of the case. I think there was some  
4 additional criteria put in when the field team  
5 started to manage the auditors.

6 **Q.** I see.

7 **A.** I'm struggling to remember but it meant that, if  
8 the field team leader or the manager that  
9 covered that team was an Appeals Manager, they  
10 couldn't be involved in anything that their team  
11 would have been involved in.

12 **Q.** Was there any sense that you picked up from  
13 senior managers, either at your level or above  
14 your level, that overturning a decision would be  
15 frowned on?

16 **A.** I can only talk personally from that point of  
17 view and I think it was frowned on when you  
18 overturned a decision.

19 **Q.** That document can come down, thank you.

20 In what way was it frowned upon?

21 **A.** Well, I just I don't think people always viewed  
22 the appeal process as something that -- one of  
23 the results could be that you overturned the  
24 decision.

25 **Q.** Who are the people you're referring to who held  
122

1 you've overturned that decision, we made the  
2 right decision in the first place".

3 **Q.** That's just somebody honestly disagreeing with  
4 the result though, isn't it?

5 **A.** Well, probably, yes.

6 **Q.** That's not somebody frowning upon the fact that  
7 an appeal has been allowed?

8 **A.** Well, not that the -- the appeal -- the right to  
9 appeal was part of the contractual term.

10 **Q.** Yes, I'm talking about the result, not  
11 exercising a right to an appeal.

12 **A.** Yes, but I think when people say you've made the  
13 wrong decision, they're frowning upon what  
14 you've done.

15 **MR BEER:** Sir, that, given the time we intend to  
16 break today, would be an appropriate moment to  
17 have the afternoon break. I realise it's  
18 relatively early. I wonder if we could say  
19 until 2.35.

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

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

22 (2.17 pm)

23 (A short break)

24 (2.34 pm)

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

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

3 **MR BEER:** Thank you very much can I just pick up on  
4 the reference I couldn't find earlier, please,  
5 POL00006671.

6 It wasn't on page 34 at all; it was on  
7 pages 9 and 10 so can we look at page 9, please.

8 The foot of the page, please, about four lines  
9 from the bottom, you say:

10 "... and that was almost sort of like  
11 I would say customer practice and at that time  
12 you know the Contract Adviser was very much more  
13 able to make the decisions on precautionary  
14 suspension and to make the decisions on  
15 termination and I guess we had the I suppose our  
16 safety net was everybody could go to appeal.  
17 Unless you resigned to avoid termination every  
18 subpostmaster had the ability to appeal the  
19 decision. You would still get the same  
20 accusations when you went to appeal. You are  
21 marking your own homework anyhow aren't you and  
22 as an Appeals Manager of which I have been  
23 an Appeals Manager you did get frowned upon if  
24 you overturned the decision I will be honest  
25 with you because I do not think well I am not

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1 homework of another Post Office employee?

2 **A.** Yes, it was an internal process.

3 **Q.** I've got it. Then you continue:

4 "... you did get frowned upon if you  
5 overturned the decision ... I am not saying that  
6 was not meant to happen but clearly it meant  
7 something had gone wrong in the way the case had  
8 been assessed."

9 **A.** Yes.

10 **Q.** Just to clear up what you were saying before the  
11 break, you felt that allowing appeals was  
12 frowned upon both by those whose decisions that  
13 you were overturning --

14 **A.** Yes.

15 **Q.** -- and by other managers within the Post Office?

16 **A.** Yes, that's my perception.

17 **Q.** Thank you. Just dealing with suspension. Can  
18 we go forward to page 12, please -- sorry,  
19 page 11, and just over halfway down, thank you.  
20 It's three lines from the bottom here. You are  
21 asked the question:

22 "When the decision is made to suspend how  
23 does the subpostmaster get hold about that?"

24 You say:

25 "[Contracts Adviser] tells them ..."

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1 saying that was not meant to happen but clearly  
2 it meant that something had gone wrong in the  
3 way the case had been assessed."

4 The reference on the top of the page there  
5 "You are marking your own homework anyhow", what  
6 did you mean by that?

7 **A.** I'm thinking that -- because it was a POL  
8 employee that was looking at another POL  
9 employee's work.

10 **Q.** I see. So it's not literally marking your own  
11 homework, in that you as the Appeals Manager are  
12 not reviewing a decision that you yourself made?

13 **A.** Oh, no, no, as an Appeals Manager, I wouldn't be  
14 reviewing any decision I made. It would be --  
15 the Appeals Manager has got to be a separate  
16 person, another person.

17 **Q.** You said that you wouldn't be hearing an appeal  
18 against the decision that one of your Contracts  
19 Advisers had made?

20 **A.** Correct, yes.

21 **Q.** It was only off area, in your case?

22 **A.** Yes.

23 **Q.** But you would be marking your own homework, in  
24 that there was an institutional independence, it  
25 was one Post Office employee marking the

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1 Yes?

2 **A.** Yes.

3 **Q.** "... on the phone?"

4 "Yes.

5 "... has that changed?"

6 "No ... the [Contracts Adviser] should  
7 suspend somebody unless we give somebody -- ask  
8 them to do it for us but the only people that  
9 should be suspending is the [Contracts  
10 Adviser]."

11 So the Contracts Adviser makes the decision  
12 and normally communicates that by phone?

13 **A.** And then it would be followed up in writing.

14 **Q.** Then you go on to say that. Yes, the solicitor  
15 says:

16 "So the [Contracts Adviser] makes the  
17 decision and normally communicates that by  
18 phone."

19 You say:

20 "Yes I make the decision and they make  
21 a recommendation."

22 What does that refer to?

23 **A.** I think it was in 2014 -- I know it's in my  
24 statement. Prior to that, the Contracts Adviser  
25 could decide whether to suspend or not and also

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1 make the decision at the end of a conduct case.  
2 After 2014, I had to ratify the decision to  
3 suspend and also the decision on the conduct  
4 case or my counterpart in the South.

5 **Q.** Got it. The solicitor then asked you about  
6 communication of the decision and, at the foot  
7 of the page, you would say:

8 "And I would be careful of which auditor you  
9 ask to do. I think some are more experienced  
10 probably than others or something like that and  
11 it is a more interesting conversation to have  
12 face to face than over the phone. But by that  
13 time the [Contracts Adviser] might have spoken  
14 to them already or they know that the auditor is  
15 talking to them somehow.

16 "... does [it end up] with a letter?"

17 "Yes."

18 Then you explain that. Then four paragraphs  
19 on, the one beginning "Well I guess", you say:

20 "Well I guess during the period of  
21 suspension, what you're trying to do is gather  
22 the information to find out what's happened."

23 Do I take it from that that, before  
24 suspension, there hadn't been an attempt to find  
25 out the information about what has happened?

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1 and then you're going to put them back in,  
2 what's the point of bringing them out? Clearly,  
3 you don't think the risk is that great. If  
4 you're going to bring them out because we've got  
5 to stop them operating until we train them  
6 better because all you're going to do is create  
7 a problem well you could end up with  
8 a reinstatement there. So you're trying to  
9 think in making the decision of suspend or not  
10 where you're going to end up with that case.  
11 Because I don't see a point just putting a load  
12 of cost in the system, messing somebody's  
13 business about for a period of however many  
14 weeks it takes us to do. Having we'll just put  
15 them back in the status quo."

16 Then a little further on, four paragraphs  
17 in, you say:

18 "In pre-Second Sight, you wouldn't have had  
19 a non-suspension situation. It was either  
20 suspension or not."

21 Question: "It was suspension or everything  
22 was fine?"

23 "Yeah."

24 Then you say:

25 "So, you know, you didn't have the

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1 **A.** No, there would have been some facts on which to  
2 suspend. We wouldn't suspend without some  
3 facts.

4 **Q.** Was an unexplained loss sufficient to suspend.

5 **A.** If there was a risk, yes.

6 **Q.** A risk of what?

7 **A.** Well, perhaps there was a refusal to repay or,  
8 you know, it was a situation you couldn't really  
9 afford to have continuing. If there was  
10 an unexplained loss.

11 **Q.** You continue:

12 "So I suppose the ultimate is the decision  
13 on what we do at the end of it. If something  
14 comes to light that says you've missed something  
15 or it's a bit of a no-brainer, then that is  
16 a point where you probably look to have we made  
17 the right decision. So when we do  
18 non-suspension, let's go back there a little  
19 bit, part of my thinking when talking to ..."

20 Is that the Contracts Adviser?

21 **A.** I'm assuming it is. I don't know what "CO" is  
22 if not.

23 **Q.** "... would be, where are we going to go with  
24 this one. If we bring them out where's it going  
25 to end up? If you're going to bring them out

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1 non-suspension element to do."

2 What are you referring to as the change  
3 there, post-Second Sight?

4 **A.** I don't know. The -- unfortunately. I think --  
5 I don't know. I am struggling with this one  
6 I'll be quite honest with you. I think when --  
7 after 2014, any situation where there was  
8 an audit loss referred to a Contract Adviser,  
9 they would come to me to make a decision and the  
10 decision would be either suspend or non-suspend.  
11 If it was non-suspend, which was perfectly fine,  
12 depending on the situation of the case, there  
13 may be some remedial work that needs to be done  
14 with the subpostmaster to help resolve whatever  
15 the problem is.

16 So non-suspension -- I'm -- I don't -- I'm  
17 struggling, I'll be quite honest with you.

18 **Q.** Who was supposed to carry out investigatory work  
19 to enable the Contracts Adviser to make the  
20 decision as to whether or not to suspend?

21 **A.** Well, on the day of the -- if we take an audit  
22 scenario, on the day of the audit, you get  
23 a call from an auditor to say there is a loss  
24 of, and whatever the circumstances were. That  
25 would go through to the Contracts Adviser, the

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1 Contracts Adviser would take details, would  
2 speak to the subpostmasters to see what they'd  
3 done, what had happened, if they've got any  
4 recollection of anything, and they could, at  
5 that point, refer to any other teams within the  
6 business that they thought was appropriate to  
7 do.

8 **Q.** The "they" there --

9 **A.** The Contracts Adviser, sorry. Speed was of the  
10 essence because, clearly, you had a team of  
11 auditors stood around in a post office, a shop  
12 that was, if it was a standalone post office,  
13 which I recognise there wasn't that many  
14 about -- by 2014 would have been closed but the  
15 post office was closed to the public, and so we  
16 would really need to resolve that situation as  
17 quickly as possible.

18 **Q.** So there was a time pressure?

19 **A.** Yes, there was.

20 **Q.** It had to be resolved there and then on the day?

21 **A.** Yes.

22 **Q.** We've heard from auditors who have told us that  
23 they did not consider it their function to carry  
24 out any investigation, other than establishing  
25 whether there was a loss or not. Would that

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1 a subpostmaster who had, over the course of  
2 a two-month period been regularly calling the  
3 NBSC and had been referred to the Horizon  
4 Helpdesk, had spoken to the Horizon Helpdesk and  
5 had been referred to the NBSC, had gone back to  
6 the NBSC and had been referred to the Horizon  
7 Helpdesk, had gone to the Horizon Helpdesk and  
8 been referred back to the NBSC, who'd gone to  
9 the Horizon Helpdesk and been referred to the  
10 NBSC, who'd gone to the Horizon Helpdesk and  
11 been referred back to the NBSC, neither of them  
12 accepting responsibility for investigating the  
13 complaint which he had and, instead, referring  
14 it to each other, what would the Contracts  
15 Adviser do on the day with the auditors in the  
16 branch having to make a decision on suspension?

17 **A.** I mean to say, I -- I don't recall a situation  
18 ever arising like that but I think we would look  
19 at that quite sympathetically but I'd also want  
20 to understand what sort of cash was involved,  
21 and, you know, is it --

22 **Q.** £25,000 in this example. It had built up  
23 gradually over a six or seven-week period?

24 **A.** Yeah, but we don't know how it's disappearing at  
25 the moment, yeah?

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1 sound right to you?

2 **A.** Well --

3 **Q.** le if the postmaster said "I know there's  
4 a loss, I've been saying for the last two months  
5 every other week to NBSC, to the Horizon  
6 Helpdesk, that there's a loss, it's me that  
7 reported the loss, it's me that caused you, the  
8 auditors, to be here. I've been on the phone  
9 day and night", they would say "All we need to  
10 do is establish that there's a loss"?

11 **A.** Well, I think --

12 **Q.** They'd call the Contract Adviser and say there's  
13 a loss. The Contracts Adviser would say,  
14 "Suspend him"; is that how it went?

15 **A.** I don't think it was as cold as that, I would  
16 say --

17 **Q.** A little warmer?

18 **A.** Yeah, well, the Contracts Adviser would not just  
19 suspend, they would check out the facts with the  
20 subpostmaster and usually any other team, so if  
21 it had been raised with the helpline or  
22 whatever, I would have thought there would have  
23 been a call to the helpline to see what's been  
24 raised and stuff like that.

25 **Q.** Yes and so let's take an example of

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1 **Q.** Yes.

2 **A.** So sometimes, you know, my --

3 **Q.** Well, the subpostmaster is saying it hasn't  
4 disappeared; the system is creating the loss.

5 **A.** Right. But there's nothing factual apart from  
6 the subpostmaster --

7 **Q.** Yes, he can tell you the dates on which the  
8 happened, he can tell you the amounts by which  
9 it can happen, and there are records in both the  
10 Helpdesk and the NBSC --

11 **A.** Of the call.

12 **Q.** -- of him calling in saying "I've just balanced,  
13 it's showing a phantom transaction, it's double  
14 the amount, say, of the amount that should be  
15 cash in the safe. I don't know how that's  
16 arisen. I've checked and rechecked my figures.  
17 I stayed up late on Wednesday night going  
18 through everything that's available to me to try  
19 to get them to balance and I can't".

20 What does the Contracts Adviser do when they  
21 get the call from the auditor who says, "Mr X is  
22 showing a £25,000 loss"?

23 **A.** And he also gets the information about this  
24 toing and froing?

25 **Q.** Yes, the auditors say, "It's not our job to

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1 investigate the toing and froing".

2 **A.** Yeah, okay, I think my first port of call, if

3 I was the Contracts Adviser, would be to the

4 toing and froing people because, if something

5 has been made so explicit and nobody really

6 wants to take responsibility, it seems a bit

7 harsh to suspend the subpostmaster until that's

8 been investigated.

9 **Q.** So in that example, admittedly perhaps

10 an extreme one, the fact that there had been

11 contemporaneous complaints by the subpostmaster

12 over a period of time as to balancing issues

13 would be a relevant factor or should have been

14 a relevant factor to take into account on the

15 suspension decision?

16 **A.** I would hope any Contracts Adviser would take

17 that into account.

18 **Q.** Thank you. Can we turn to the last topic for my

19 questions, please, and turn up POL00107696.

20 Thank you.

21 This is an email exchange and you can see

22 from the first page there that it ends up with

23 you on 20 December 2011?

24 **A.** Yeah.

25 **Q.** But can we get some context by going to the last

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1 subpostmasters, making a number of allegations

2 about the training they received, the support

3 available to them in using the Horizon system

4 and the Horizon system itself."

5 Those are all three topics that you yourself

6 had concerns about, I think it's fair to say; is

7 that right?

8 **A.** Yes.

9 **Q.** "There is a possibility that these letters of

10 claim will be followed up with court

11 proceedings, in which [the Post Office] will

12 have a duty to disclose to the claimants all

13 documents relevant to the claims, even if they

14 might adversely affect [the Post Office's]

15 defence. This obligation extends to soft copy

16 documents [then there's a description given] as

17 well as hard copy documents and manuscript

18 notes.

19 "Please ensure this communication reaches

20 everyone in your department who has access to,

21 or is in position to create, documents relating

22 to the issues arising in the claim (as set at

23 more fully below). I have started a list of

24 teams which we believe may hold relevant

25 documents."

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1 page, which is page 4. This is the foot of

2 an email, just to see who it's signed off by,

3 Emily Springford, a lawyer, a Post Office

4 lawyer, yes?

5 **A.** Yes.

6 **Q.** If we go back to page 2, please, and the foot of

7 page 2., we can see the beginning of

8 Ms Springford's email, and you can see on a copy

9 list there you're not included originally?

10 **A.** Yeah.

11 **Q.** Angela van den Bogerd, amongst others, Susan

12 Crichton and Mr Scott, from whom we've heard.

13 Is there anyone there who was your manager?

14 **A.** Err ... 2011. There was a time I reported

15 directly to Angela van den Bogerd but I can't

16 remember when that was. I have never reported

17 to any of the other people that are mentioned.

18 **Q.** So there's a possibility that, at this time, she

19 was your report?

20 **A.** Yes, I just can't remember when I reported --

21 because line management changed quite

22 frequently.

23 **Q.** Ms Springford says:

24 "As you are aware, [the Post Office] has

25 received 4 letters of claim from former

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1 That's attached, okay?

2 Then there's a section on document

3 preservation and document creation. I'm not

4 going to read the bit about document creation

5 for the moment, we'll deal with that elsewhere,

6 but "Document preservation":

7 "[The Post Office] must take immediate steps

8 to preserve all documents which might

9 potentially be relevant to these claims.

10 'Relevant' documents are those which contain the

11 information about the issues below ..."

12 Amongst those is recruitment, training and

13 support given to subpostmasters:

14 "Please note no historic time limit applies

15 ...

16 "Could each of you please inform the members

17 of your teams who hold or create documents ...

18 that they should not delete or destroy any

19 documents in these categories until further

20 notice.

21 "It is important you keep a note of any

22 routine document destruction policies that you

23 suspend within your department, and the dates on

24 which they are suspended, together with a note

25 of any other steps you take to ensure your

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1 department complies with the above  
2 requirements."  
3 Then if we go up, please, to page 2 in the  
4 middle and keep going, please, and a bit more.  
5 Thank you.  
6 Ms Springford emails you directly two months  
7 later in December. We were previously on  
8 20 October, we're now on 15 December 2011. The  
9 others on the list there, can you help us as to  
10 the roles they performed at that time?  
11 **A.** Alison Bolsover would have been in the debt area  
12 in Chesterfield; sue Richardson, I think, was  
13 responsible at some point for the training team;  
14 graham Padget, I'm struggling with; Sarah Rimmer  
15 was certainly based in the HRSC at Bolton at  
16 I think will have been dealing with application  
17 cases or subpostmasters remuneration;  
18 Dave Hulbert, I don't know, I think he was  
19 something to do with IT.  
20 **Q.** Okay. Ms Springford says:  
21 "Please see the [message] below: [it] should  
22 have reached you via your team leaders but in  
23 the interests of certainty I have included it  
24 here."  
25 So previously people who might have been  
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1 "do we want to include on the list of  
2 relevant documents performance and conduct ...  
3 papers?"  
4 Then:  
5 "do we want to suspend the Iron Mountain  
6 destruction policy of destroying files after  
7 7 years (I think we have discussed this and said  
8 no to this question in the past)."  
9 The original email said that there was  
10 a duty to preserve documents and that teams  
11 should ensure that, in relation to documents  
12 that they hold or create, they are not destroyed  
13 or deleted until further notice and any routine  
14 destruction policies that need to be suspended,  
15 a note should be kept of that fact. You're here  
16 saying that we've discussed whether to suspend  
17 destruction in the past and have said no --  
18 **A.** Yes.  
19 **Q.** -- to the suspension of a destruction policy.  
20 Can you remember in what context that was?  
21 **A.** No, I really can't.  
22 **Q.** Was it in the context of the threatened claims  
23 by the JFSA?  
24 **A.** I would be guessing, I don't know.  
25 **Q.** Can you think of any other context in which the  
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1 your team leader, including Angela van den  
2 Bogerd, have been asked to pass the message on  
3 but she is now sending it on directly to you  
4 anyway, in case it hadn't:  
5 "I understand you kindly helped Alison to  
6 complete the attached table, showing the sources  
7 of documents which may be relevant. Many of  
8 these appear to relate to individual branches.  
9 Our solicitors have asked where we keep  
10 documents relating to general policy surrounding  
11 the issues below (branch accounting,  
12 recruitment, training, Horizon issues and so on)  
13 ...  
14 "Could you each please update the table to  
15 make clear where such documents are held? If  
16 they are sent to Iron Mountain after a period of  
17 time, please could you indicate at what stage  
18 they are sent there and how they would be  
19 described ..."  
20 Then scroll up, please, on to the foot of  
21 page 1. You reply directly to Ms Springford and  
22 say you've updated the table, just a couple of  
23 points in relation to the email of the  
24 20 October, that's the original one at the foot  
25 which we read under "Document preservation":  
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1 destruction of files may have been mentioned, in  
2 particular a decision not to suspend  
3 a destruction policy?  
4 **A.** No.  
5 **Q.** Can you help as to why you would not suspend  
6 destruction in the light of threatened claims?  
7 **A.** Well, I guess you would suspend destruction, if  
8 you needed to retrieve documentation.  
9 **Q.** So you would suspend --  
10 **A.** Yes.  
11 **Q.** -- destruction?  
12 **A.** You wouldn't stop them.  
13 **Q.** So why are you asking the question, "Do we want  
14 to suspend"?  
15 **A.** I think just for clarity. I don't know whether  
16 this was -- I am really sort of guessing here.  
17 I'm not talking from any sort of knowledge.  
18 Now, whether there'd been some sort of change of  
19 who reported to me or -- but there was  
20 a contract admin team that I think looked after  
21 all of the branch files for every branch in the  
22 network, that originally were kept across the  
23 network. They all came together in Leeds.  
24 Whether I had then responsibility, I don't know.  
25 I'm struggling with that question, I'm afraid.  
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1 Q. Just for completeness, to see what her answer to  
2 you was, a reply to you next day, on your  
3 specific questions, and then the second bullet  
4 point:

5 "no, in relation to files relating to  
6 individual branches."

7 Which I think in context means no, we're not  
8 going to suspend destruction of individual  
9 files:

10 "However, if there are boxes at [Iron  
11 Mountain] containing general policy documents,  
12 we would like to recall those now if that is  
13 feasible, as mentioned below."

14 Can you assist any further as to why it  
15 seems that a decision was taken not to suspend  
16 the destruction of individual branch files in  
17 the context of threatened litigation?

18 A. No, I can't.

19 Q. Was the advice given there carried into effect,  
20 to your knowledge?

21 A. I know the suspension of -- destruction of  
22 branch files at Iron Mountain was suspended, but  
23 when that happened, I cannot -- I can't tell you  
24 whether it's 2011, 2013, or when it was. I mean  
25 to say, as a little bit of background, hopefully

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1 subpostmasters and mistresses. In your  
2 statement, Mr Breedon, you say, and I'm  
3 referring to and I'll just briefly read out,  
4 paragraph 146.6 at page 45. It doesn't need to  
5 go on the screen. You say this:

6 "Other than what I have gleaned from the  
7 information provided in the supporting  
8 documents, I have no recollection of the cases  
9 relating to Peter Holmes ..."

10 Then you go on and refer to a number of  
11 other individuals.

12 A. Yeah.

13 Q. Sitting to my left in the Inquiry room is  
14 Mrs Marion Holmes, who is the widow of  
15 Mr Holmes. Mr Holmes himself died in 2015.  
16 That was a number of years before his name was  
17 cleared in the Court of Appeal in the High Court  
18 in London.

19 Now, I'm going to take you, please, to  
20 a document which is POL00054555. At the top of  
21 the page, you'll see, Mr Breedon, that that is  
22 an email from you --

23 A. Yes.

24 Q. -- to Andrew Daley --

25 A. Yeah.

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1 not digging myself into a bigger hole here, but  
2 the branch files, we did a lot of work on making  
3 sure we had files for every branch and, where we  
4 couldn't find anything, we made sure we had  
5 notes of which ones we couldn't file.

6 So a lot of work and time went into trying  
7 to get the branch files in some sort of order  
8 and so -- and I don't know if that was as  
9 a consequence of the Second Sight stuff or  
10 anything like that. But, you know, we were  
11 quite particular about these and wouldn't want  
12 something destroyed that we'd spent a lot of  
13 time on, if it was going to be material to  
14 something.

15 **MR BEER:** Mr Breedon. Thank you very much, they're  
16 the only questions I ask.

17 Sir, I believe there are some questions on  
18 behalf of one subpostmaster team, Mr Stein.

19 **SIR WYN WILLIAMS:** Certainly. Over to you,  
20 Mr Stein.

21 **Questioned by MR STEIN**

22 **MR STEIN:** Thank you, sir.

23 Mr Breedon, my name is Sam Stein. I ask  
24 questions on behalf of the solicitors Howe+Co  
25 and we represent a very large number of

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1 Q. -- and then copied to others, Robert Daily --  
2 spelt differently to Andrew Daley -- and also  
3 Andrew Carpenter. Now, this appears to be  
4 directed mainly to Andrew Daley, and it says:

5 "Andrew,

6 "Thanks for your email below.

7 "In respect of this case where the SPMR was  
8 precautionary suspended on 18 September 2008  
9 when a loss of £46,049.16 was identified. The  
10 outcome of the contractual case was that the  
11 SPMR was reinstated with a warning ..."

12 Then if we scroll further down the page,  
13 please, roughly to the middle of that. We see  
14 at the end of this message:

15 "The only one thing I am not sure of is  
16 whether the assistant was debarred in this  
17 case -- could you arrange for this to happen if  
18 the form has not been completed."

19 So, let's piece this together. The  
20 assistant that has been identified, in fact he  
21 was the office manager, was Mr Holmes. If we  
22 scroll further down on this particular email  
23 chain we'll see it relates to -- there we go,  
24 top right-hand corner, subject matter, "*Regina*  
25 *v Peter Anthony Holmes*," and it concerns the

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1 Jesmond Post Office.

2 **A.** Right.

3 **Q.** Now, just help us a little bit more in

4 understanding what was going on at this stage.

5 Clearly, you did have some involvement with the

6 matter that related to Mr Holmes?

7 **A.** Well, only because of what you're telling me

8 here. I can't -- I couldn't -- I don't recall

9 the case, because it goes back to 2010.

10 **Q.** We see this email, if you go back to the top,

11 you're asking this question:

12 "The only thing I am not sure of is whether

13 the assistant was debarred in this case ..."

14 **A.** Yes.

15 **Q.** Help us understand what you were doing here.

16 Mr Holmes was not directly employed by the Post

17 Office?

18 **A.** No.

19 **Q.** He was an employee at this particular Post

20 Office branch. What was happening regarding his

21 debarment here, Mr Breeden?

22 **A.** Well, there was a department register that if

23 somebody had been undertaking some inappropriate

24 activity, would mean that they would not be

25 picked up as an employee for Royal Mail or the

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1 his widow, who sits in this Inquiry?

2 **A.** Well, naturally, I'm very sorry for your loss

3 but, as I said in my statement, I do not recall

4 this case and we dealt with this matter

5 contractually with the subpostmaster. I was not

6 aware that -- or I had nothing to do with taking

7 this individual to court.

8 **Q.** Now, since your email that related to the

9 debarment of Mr Holmes, obviously many years

10 have gone by. The matter went to the High

11 Court, where Mrs Holmes took part in the

12 proceedings representing her husband as part of

13 the 555 Litigants. You said earlier in your

14 evidence that you believe the High Court

15 litigation was at least partly taken by the Post

16 Office in order to try to -- this is my

17 paraphrase of what you said -- in order to try

18 and get rid of these issues, stamp it out. Why

19 did you say that, Mr Breeden? Where did you get

20 that idea from, that the litigation was taken on

21 against the 555 people and stamped out?

22 **A.** This is the --

23 **Q.** The High Court litigation.

24 **A.** That I was involved in, yes?

25 **Q.** Yes.

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1 Post Office.

2 **Q.** I see. So this was making sure that in this

3 particular case, that Mr Holmes, who'd worked at

4 this particular Post Office branch for many,

5 many years, was never going to be employed by

6 the Post Office again or working within a Post

7 Office branch; is that right?

8 **A.** That's correct, yeah. The process is related to

9 the debarment process -- the debarment lists

10 were very -- I think haphazard is the best way

11 to describe them.

12 **Q.** The Post Office branch was in Jesmond, Newcastle

13 upon Tyne?

14 **A.** Yes.

15 **Q.** Mr Holmes had worked in that area for many years

16 as a beat police officer, also ran a hotel in

17 that area for many, many years. As a result of

18 his conviction, he suffered severe depression,

19 he found it very difficult to deal with matters

20 in his life. He couldn't even find occasional

21 or voluntary employment within voluntary

22 services because he would have had to disclose

23 his conviction. He was eventually cleared at

24 the Criminal Court of Appeal many, many years

25 later in 2021. Have you got anything to say to

150

1 **A.** In 2018?

2 **Q.** Yes. At the High Court.

3 **A.** Well, I think that's the perception I had,

4 that --

5 **Q.** From where, Mr Breeden?

6 **A.** From the business, from Post Office Limited.

7 **Q.** Who within the business, Mr Breeden?

8 **A.** The people that were communicating with us.

9 **Q.** Who were they? Name them.

10 **A.** Well, there was a number of sort of people in

11 the Legal Services team at the time that were

12 sort of briefing us on this.

13 **Q.** They were what?

14 **A.** Explaining what was going on.

15 **Q.** The impression that they were trying to stamp

16 out the 555 -- one them is sitting here to my

17 left, Mrs Holmes -- from who did you get that

18 impression, Mr Breeden?

19 **A.** That's the perception I picked up from within

20 Post Office Limited when I was there.

21 **MR STEIN:** Excuse me, sir, for one moment.

22 Sir, thank you. Those are my questions.

23 **SIR WYN WILLIAMS:** Thank you. Does anybody else

24 have any questions?

25 **MR BEER:** No, sir, they don't.

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1 **SIR WYN WILLIAMS:** Well, thank you, Mr Breeden, for  
2 your witness statement, and for coming to give  
3 evidence.

4 I think that brings the hearing to  
5 a conclusion, does it not, Mr Beer?

6 **MR BEER:** Yes, it does, and we're back at 10.00 am  
7 tomorrow with Alan Lusher.

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

9 **MR BEER:** Sorry, 12.00 tomorrow, with Alan Lusher.

10 **SIR WYN WILLIAMS:** 12.00, because of a personal  
11 commitment I have.

12 Mr Stein, on one occasion, at least, I've  
13 seen Mrs Holmes before, so convey my best wishes  
14 to her, will you?

15 Thank you very much, everyone.

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

17 **THE WITNESS:** Thank you.

18 **(3.10 pm)**

19 **(The hearing adjourned until**  
20 **the following day at 12.00 noon)**

21  
22  
23  
24  
25

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