

Thursday, 19 October 2023

1
2 (9.58 am)
3 **MR BLAKE:** Good morning, sir, can you see and hear
4 me?
5 **SIR WYN WILLIAMS:** I can, yes. Thank you.
6 **MR BLAKE:** Thank you, sir. You have granted
7 Ms Bolsover permission to attend remotely today
8 so she appears in front of me on a screen.
9 **SIR WYN WILLIAMS:** So I see, yes.
10 **MR BLAKE:** Thank you. Can I call Ms Bolsover.
11 **SIR WYN WILLIAMS:** Yes.
12 **ALISON BOLSOVER (affirmed)**
13 **Questioned by MR BLAKE**
14 **MR BLAKE:** Thank you very much. Can you give your
15 full name, please?
16 **A.** Alison Bolsover.
17 **Q.** Ms Bolsover, you should have in front of you
18 a witness statement dated 5 May this year; is
19 that correct?
20 **A.** That's correct, yeah.
21 **Q.** Can I ask you to turn to page 42, the final
22 substantive page. Is that your signature on the
23 page there?
24 **A.** It is, yes.
25 **Q.** Is that statement true to the best of your

1

1 having debt recovery in 2018.
2 **Q.** Thank you very much. The department you were
3 based in was originally called the Product and
4 Branch Accounting Department; is that right?
5 **A.** That's right, yes.
6 **Q.** Then it became the Financial Services Centre?
7 **A.** Yes.
8 **Q.** Are you able to assist us in terms of the timing
9 of that change?
10 **A.** I can't remember the exact dates, it actually
11 moved different names, because then it also,
12 latterly, became the Branch Reconciliation Team
13 within Network, so it's had three different
14 steps, although the same teams within it or
15 similar teams within it, Product and Branch
16 Accounting first, then Transaction Correction,
17 Transaction Processing and then Branch
18 Reconciliation Team.
19 **Q.** Thank you and were there any substantive
20 difference between those departments or
21 significant differences between those
22 departments?
23 **A.** Other than different teams that I was managing.
24 So whenever there was a reorganisation or teams
25 were moving about, I might take different leads

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1 knowledge and belief?
2 **A.** It is yes.
3 **Q.** Thank you. For the purpose of the transcript
4 that statement is WITN06120100 and that
5 statement will be published on the Inquiry's
6 website shortly.
7 I'm going to begin just with a little bit of
8 background. You worked for the Post Office for
9 36 years between 1985 and 2021; is that correct?
10 **A.** Correct, yes.
11 **Q.** You progressed from an administrative grade, the
12 whole way up to Senior Manager?
13 **A.** Yes, that's right.
14 **Q.** For today's purpose in particular, between 2007
15 and 2018 you were the Senior Debt Recovery
16 Manager; is that right?
17 **A.** Yeah, that's right. It did have different
18 titles but in my statement I've continued to say
19 Senior Debt Recovery Manager.
20 **Q.** Can you give us an idea of a few of those titles
21 or some of those titles?
22 **A.** I think there was one of around like a Branch
23 Accountant and various names, Revenue Protection
24 Manager, but mainly it's been, in latter years,
25 Senior Debt Recovery Manager up until me not

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1 for different teams.
2 **Q.** In 2018 you became Senior Manager in the Network
3 Operations Support Team, heading the Branch
4 Reconciliation Team; is that correct?
5 **A.** That's correct, yes.
6 **Q.** That was until 2021 when you retired?
7 **A.** Yes.
8 **Q.** Was there a difference between your role in 2018
9 onwards and your role prior to that?
10 **A.** I didn't have the Current and Former Agents Debt
11 Team working to me after, I think, 2018, so they
12 split into another path within the Network
13 Support Team but I took on all the issuing of
14 transaction corrections within my area and
15 enquiries.
16 **Q.** Thanks. I'm going to take you to an organogram,
17 which might give us an idea of your position in
18 the hierarchy for quite a lot of that time. Can
19 we look at FUJ00116860, please. It's page 57.
20 So we have you in the top of the hierarchy
21 there. This is, I think, a 2009 organogram?
22 **A.** Yeah.
23 **Q.** We have you there at the top, Branch Conformance
24 and Liaison Manager --
25 **A.** Yes.

4

1 Q. -- managing, for example, Andrew Winn, the
2 Relationship Manager?
3 A. Yeah.
4 Q. We have the Fraud and Conformance Team
5 underneath you, another layer below?
6 A. Yeah, that was until 2012 and then that moved
7 into Security.
8 Q. Can you assist us with that? What do you see is
9 the difference between fraud and conformance?
10 A. The team were looking for various patterns and
11 I think the biggest role that they did play was
12 looking for excessive cash in the Network, so
13 contacting branches to try to reduce,
14 potentially, risk of -- you know, if an office
15 had a robbery or a burglary, so to reduce the
16 cash holdings that were in there.
17 But also looking for patterns of anything
18 that caused concern. So were there patterns
19 that, you know, there was excessive transaction
20 corrections or things like that, and it could be
21 that, yes, there could have been an element of
22 fraud but it was also around the conformance
23 aspect.
24 Q. So, on the one hand, you have fraud which is
25 an offence of dishonesty and, on the other, you

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1 about the Horizon system. Are you aware of that
2 in any way playing a role in that team moving to
3 the Security Department?
4 A. I don't believe it formed a role in -- formed
5 that role. It was just around looking at what
6 teams we were managing at the time and it moved
7 out. Likewise, Cash Control moved out of my
8 area, so there was different splits of teams.
9 So I was predominantly around Accounts
10 Receivable, as such, and collecting debts.
11 So some teams were moved out and one being
12 Fraud and Conformance into Security. Cash
13 Control went to sit within another Senior
14 Manager within Product and Branch Accounting.
15 Q. Thank you very much. That can come down.
16 I'm going to take you through a few basic
17 terms and principles that you'll be well
18 familiar with, quite a few people in this room
19 will be familiar with, but it will assist us in
20 looking at the various policies. I'm going to
21 begin by looking at the process for disputing
22 debts then I'll move on to the recovery of debts
23 before moving on to other topics.
24 So starting with disputing debts, in your
25 statement you refer to the SAP or the POLSAP or

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1 have conformance which might be somebody simply
2 not following the right processes and
3 procedures; is that a fair distinction between
4 the two?
5 A. Yeah.
6 Q. Did you see it as appropriate that those two
7 teams were part of the same team?
8 A. Not potentially, no. I think the fraud element
9 was around looking at data to see if there were
10 patterns. The team wouldn't necessarily
11 progress fraud themselves; they'd pass it to
12 a Security team. So it was around finding the
13 data, it -- were there any patterns and raising
14 a flag to say "Is there an issue here?"
15 Security, can you investigate it?"
16 Q. You say in 2012 that team moved to the Security
17 team. Are you able to assist us with why it
18 moved to the Security team?
19 A. I think it was seen that, you know, they could
20 do the analysis themselves and it fits, rather
21 than being within Product and Branch Accounting,
22 it sat better within the Security area.
23 Q. We're going to come to it in due course but in
24 2012 it was quite an important period in the
25 Post Office in respect of emerging concerns

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1 the SAP system. Can you assist us with, in
2 basic terms, what that was?
3 A. It's a -- well, it's supposed to be a standard
4 SAP package that the finance ledgers were sat
5 on, as such. So all transactions at summary
6 level daily fed through to a SAP, POLSAP GL
7 account. And information from clients came in,
8 and were matched, so then, if there was
9 a mismatch, it was investigated and that could
10 lead a transaction correction being issued.
11 Q. Thank you. I'll take you through transaction
12 corrections in a moment.
13 A. Yeah.
14 Q. In terms of that system though, was that the
15 main system, then, that your department used in
16 order to carry out their function?
17 A. Yes, that and Credence. So looking at
18 individual transactions in Credence, whereas
19 POLSAP was a summary of that day's transaction,
20 Credence was seen as each individual
21 transaction.
22 Q. Thank you very much. Are we talking about
23 post-2005, in respect of these systems?
24 A. No.
25 Q. They predated the changes?

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1 A. They were -- POLSAP was introduced in 2005, late
 2 2005, after the branches were -- started using
 3 Horizon. Then Chesterfield -- prior to 2005,
 4 Chesterfield was working on a paper basis.
 5 After 2005, it was more electronic data.
 6 Q. Thank you. Error notices: you say that pre-2005
 7 nothing in relation to the cash account was
 8 automated in branches and the subpostmaster
 9 completed a paper cash account and sent it to
 10 Chesterfield.
 11 A. That's right.
 12 Q. I'd like to clarify what you mean there by
 13 "paper cash account". Presumably that did
 14 include a Horizon printout of some sort? The
 15 subpostmasters weren't still keeping a separate
 16 written record, for example, of all their
 17 transactions?
 18 A. Until the whole network was transformed, as
 19 such, we were still keying documents. So I do
 20 believe there were some branches that sent
 21 Horizon data, as such, or an Horizon sheet, but
 22 there were still paper cash accounts as well,
 23 which was literally a piece of paper that was
 24 completed by hand.
 25 Q. So prior to 2005 there were -- for those who had

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1 well, so there was quite a few Senior Managers
 2 who had different areas at that time.
 3 Q. Moving to transaction corrections, those who
 4 have been following the Inquiry carefully will
 5 know what transaction corrections are but can
 6 you briefly tell us what you understood
 7 transaction corrections to be?
 8 A. A transaction correction is issued via the
 9 POLSAP system or -- and it's an electronic
 10 message to Horizon that confirms what's
 11 happened. So it's got -- it's either a debit or
 12 a credit to the branch and it's got a narrative
 13 on it to say what has happened, what's gone
 14 wrong, as such, postmaster's not claimed enough
 15 within his pouch or, you know, a cash
 16 remittance, and things like that.
 17 So any product that was matched, we -- any
 18 differences were sent to branches.
 19 Q. The issuing of transaction corrections came from
 20 within your department; is that correct?
 21 A. I took the issued of transaction corrections
 22 around 2016, I think. So, initially, I was
 23 doing it from 2005 to 2007, then I wasn't
 24 issuing -- my teams weren't issuing transaction
 25 corrections up until, I think, 2016, but --

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1 the Horizon system in place, Chesterfield was
 2 actually referring to Horizon printouts, though,
 3 in order to carry out their analysis?
 4 A. I think they were being keyed. I'm unsure.
 5 I can't quite remember whether there was any
 6 level of interface prior to 2005. But, mainly,
 7 it was around keying a cash account, manually
 8 keying a cash account, and the supporting
 9 documents --
 10 Q. Can you assist us with what you mean by
 11 "keying".
 12 A. Physically keying the data into a system.
 13 Q. Thank you. Can you tell us what an error notice
 14 was, please?
 15 A. It's either -- where there's a difference in the
 16 values, either a debit or a credit, so were
 17 either requesting money for a debit TC or giving
 18 a credit to the branch where they've understated
 19 something and they're claiming a credit.
 20 Q. Prior to 2005, that would be dealt with by
 21 Chesterfield; is that correct?
 22 A. That's correct, yeah.
 23 Q. That wasn't something that you were involved in?
 24 A. I was involved in managing of the teams, as such
 25 but there was a whole raft of people there, as

10

1 yeah, '16.
 2 Q. Who was responsible in between those periods?
 3 A. Other Senior Managers within Product and Branch
 4 Accounting. So I think there was five Senior
 5 Managers reporting in to Rod Ismay.
 6 Q. Can you assist us with why a system of
 7 transaction corrections is needed?
 8 A. To enable us to, as such, balance the book -- if
 9 in a purely -- everything going right scenario,
 10 if a branch has keyed something in wrong to
 11 Horizon, the clients would be paid incorrectly.
 12 By issuing the transaction correction, we are
 13 then amending that product to pay the clients
 14 correctly and balance the books, as such, in the
 15 branches. So if they've taken £1,000 but only
 16 keyed 100, they should have a surplus, and
 17 a transaction correction would request that
 18 surplus.
 19 Q. The way that it would work is data would come
 20 from two main sources and that's the Horizon
 21 system but also data from the clients. So when
 22 we speak about clients, you're talking about,
 23 for example, Camelot or an ATM or debit cards;
 24 is that correct?
 25 A. Yeah, or cash management from a -- for cash

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1 remittances.

2 **Q.** Thank you. There's also something called
3 a transaction acknowledgement. Very briefly,
4 can you tell us what a transaction
5 acknowledgement is and how that's different from
6 a transaction correction?

7 **A.** A transaction acknowledgement sends out the data
8 that the clients have given us as an electronic
9 message into Horizon to ask the branch to
10 confirm or acknowledge that that transaction is
11 what they took that day, or those transactions.
12 So such as Camelot, for the online game it
13 would -- when it was originally put in place it
14 was called a ping project. It was around
15 pinging data out to branches, rather than
16 branches having to put the figures in
17 themselves.

18 **Q.** Thank you. Moving back to transaction
19 corrections, can you assist us with what level
20 of expertise and experience the staff who were
21 carrying out those transaction corrections were?

22 **A.** There was a lot of experienced staff within
23 Product and Branch Accounting and some left
24 after, you know, 49 years' service to retire, so
25 there was a lot of experience there on the

13

1 remember from your time?

2 **A.** I vaguely remember it being produced, yes.

3 **Q.** Can we look at page 8, please. It's 3.1 I'd
4 like to look at, please. It says there
5 "[Investigating] and Correcting Transaction
6 Corrections":
7 "There are several ways to create
8 a Transaction Correction in POLFS. The manual
9 option is used by teams that don't raise many
10 Transaction Corrections. These teams spend time
11 [investigating] errors and enquiries that don't
12 result in a Transaction Correction. The
13 automated option creates Transaction Correction
14 individually but carries data into fields from
15 the original open item.
16 "Teams that are driven by requested
17 Transaction Corrections are able to use
18 a spreadsheet to upload bulk branch details.
19 This saves time and effort."
20 Are you able to assist us there with what
21 that all means? It sounds as though there are
22 multiple different ways of creating
23 a transaction correction.

24 **A.** Yes, there were -- the open -- individual open
25 item was for the branch, so a branch with --

15

1 product. So the teams dealt specifically with
2 products, so they became expert in that product
3 line and how to gain additional evidence was
4 such as Camelot, or, you know, another
5 supplier -- another client, as such. So they
6 could then investigate -- use the systems as
7 well, so such as cheque remittances, there was
8 a system where we could see all the cheques that
9 had been processed and be able to analyse that,
10 and the staff were able to analyse that against
11 the data.

12 **Q.** Thank you. That's their experience but, in
13 terms of their level within the company, I think
14 you've said you started at administrative grade
15 and moved to, eventually, Senior Manager. Where
16 on that hierarchy did the people who were
17 dealing with transaction corrections fall?

18 **A.** They were administration grades, Postal
19 Officers.

20 **Q.** Thank you. Can we look at POL00029370, please.
21 This is a document from 2010 called "Review of
22 the Creation and Management of Transaction
23 Corrections in POLFS to Correct Accounting
24 Errors in Horizon" and it has you down there as
25 an "approver". Is this a document that you

14

1 that had a difference on the general ledger
2 account. The team could go in and issue
3 an individual transaction correction straight
4 from the system. So it went onto a file that
5 was then uploaded into Horizon.
6 The other method, such as cash remittances,
7 they could be bulk uploaded, as such. So the
8 cash centres would send information on the
9 differences between what was stated as returned
10 from a cash remittance from the branch to the
11 Cash Centre, any differences were uploaded on to
12 a spreadsheet and that would be uploaded into
13 the system. So it was a bulk upload, as such,
14 of information going out.

15 **Q.** Was that quite a manual process in terms of
16 creating a spreadsheet and uploading it in that
17 way?

18 **A.** Not from a cash point of view. The data was
19 collated by the Cash Centres. So from a Product
20 and Branch Accounting or transaction processing
21 point of view, it was a file that needed
22 loading, rather than individual items that
23 needed to be gone through and a narrative put
24 on --

25 **Q.** So another department created that file?

16

1 A. Yes, I did.

2 Q. Thank you. Can we look at paragraph 19 of your
3 witness statement, it's WITN06120100, and it's
4 page 11. Paragraph 19, you have described it
5 this way, you say:

6 "The open item accounts were fed by two
7 streams of data, one from the Branch via Horizon
8 and the other stream from a Client, Cash Centre
9 or Supplier that processed items, such as the
10 Cash Centres, Camelot, ATM, Cheques, Debit Cards
11 and MoneyGram. The open items accounts were
12 matched daily, any mismatched or unmatched
13 accounts were investigated to give evidence and
14 narrative for a [transaction correction] to be
15 issued."

16 Can you assist us with what kind of
17 investigation was carried out?

18 A. It depends on the product line, so, as I've just
19 said around cheques, if a branch had dispatched
20 cheques to processing, any differences, the team
21 member could look at the batch control voucher
22 sent by the branch and each individual cheque
23 that was processed behind that batch control
24 voucher. So if there'd been a keying error by
25 the branch or they'd transposed figures, it

17

1 Q. Thank you. Can we go back to the document we
2 were looking at. It's POL00029370, and it's
3 page 5. It's the bottom of page 5, please.
4 There's a section here on "Failed Transaction
5 Corrections".

6 A. Yeah.

7 Q. Then, if we look over the page, it gives some
8 examples of why some transaction corrections
9 would fail.

10 A. Yeah.

11 Q. For example, the branch is closed; the value of
12 the transaction correction is not within the
13 parameters of product; the product is not valid;
14 Crowns settled centrally; the wrong flag is
15 chosen when creating a transaction correction;
16 and then the final one:

17 "Horizon allows branch to roll over to next
18 trading period without accepting all Transaction
19 Corrections. There is an anomaly in Horizon
20 that when a multi-terminal branch has two or
21 more terminals completing a transaction
22 simultaneously the branch is able to roll over
23 to the next trading period without accepting all
24 the Transaction Corrections. This not a widely
25 known or occurring problem."

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1 could be seen on the individual cheques and
2 copies of those cheques could be sent out to
3 branch and the narrative would be formed around
4 which cheques were incorrect. So anything that
5 we could investigate in that vein was done.

6 Q. We'll come to it something in due course but
7 something like an alleged bug, error or defect
8 in Horizon wasn't something that your team would
9 investigate; is that correct?

10 A. Not -- I think the word "bugs" or "defects",
11 were not necessarily used, so I think that's
12 where some of the confusions happened. So there
13 were sometimes issues that were raised by the
14 NBSC and my team, or the team leader or analyst,
15 would be involved in those meetings but not in
16 any scale that, you know, they'd ring up and say
17 they'd got a bug. It would go into NBSC.

18 Q. But, as part of those investigations that you've
19 described, if it was, say, a software error, for
20 example, that's not something that you would be
21 able to investigate?

22 A. No, no, it would have to be IT that investigated
23 that.

24 Q. When you say IT, who do you mean?

25 A. The IT Service Desk.

18

1 Are you able to assist us with that final --

2 A. I'm struggling with that one because we did do
3 checks that branches were rolling over and the
4 report that we used to get used to show which
5 transaction correction would have failed, and
6 then the investigation would go on to all these
7 points around, you know, is it -- is the branch
8 closed, that's why it's not been able to be sent
9 or to be received? But I don't know, I can't
10 remember this anomaly.

11 Q. It says there "This is not a widely known or
12 occurring problem". Was there a system within
13 your department to share and inform those who
14 are dealing with transaction corrections about
15 these kinds of issues?

16 A. At 2010, I wasn't managing transaction
17 corrections. I don't know, is the honest
18 answer.

19 Q. But during the period that you were managing?

20 A. I'd never known that happen, so --

21 Q. But was there a system in place that shared this
22 kind of -- I mean this is one paragraph in quite
23 a thick and complex policy document. Was there
24 a system in place within the department to make
25 those administrative officers who were dealing

20

1 with transaction corrections aware of these
 2 kinds of issues that might occur with failed
 3 transaction corrections?
 4 **A.** If a failed transaction had happen, it would be
 5 investigated by the issuer and their team leader
 6 to ensure the transaction corrections did go
 7 out.
 8 **Q.** But that's in an individual case.
 9 **A.** Yeah.
 10 **Q.** But was there a process to share that knowledge?
 11 **A.** I think there was -- there was some sort of
 12 documentation around failed transactions,
 13 transaction corrections. So it would have been
 14 in the library of processes within that.
 15 **Q.** So -- an individual at administrative grade
 16 would have to go into the library, the
 17 electronic library, and try and find out that
 18 kind of information?
 19 **A.** Yeah, I think we had a systems team at this
 20 stage, I believe, within Product and Branch
 21 Accounting that created the ledgers, et cetera,
 22 and they flagged that -- I think at this stage
 23 they flagged back to the team leader that
 24 a transaction correction had failed. It was
 25 then investigated and it was the responsibility

21

1 **Q.** The list here is quite long of failed
 2 transaction corrections. We've heard about
 3 spreadsheets being created for bulk transaction
 4 corrections --
 5 **A.** Yeah.
 6 **Q.** -- the system having input from various
 7 different sources. It sounds like quite
 8 a complicated system; is that fair? Was that
 9 your experience?
 10 **A.** After working on it 36 years, no, it didn't seem
 11 complex to me but it would, I believe, with the
 12 complexity of the products and everything else.
 13 You know, there was a lot of work within it.
 14 **Q.** If you were an administrative officer who was
 15 working in that team, do you think it was quite
 16 a complicated process?
 17 **A.** As an administrator, no. I think all the
 18 procedures were laid down, staff did get
 19 training if they moved on to new teams, and it
 20 was basically a step-by-step process for them to
 21 administer.
 22 **Q.** Do you think there was potential for error in
 23 what they were administering because of the
 24 underlying complexity to the system?
 25 **A.** I don't think we could ever say that it was --

23

1 of the team leader to ensure it was reissued or
 2 steps were then taken to -- if it was a closed
 3 branch, the transaction correction would be
 4 transferred over to the customer account, so to
 5 clear the open item.
 6 So there were steps and control steps in
 7 place to ensure we didn't just have transaction
 8 corrections hanging on the system.
 9 **Q.** Again, that's for individual cases --
 10 **A.** Yeah.
 11 **Q.** -- but it seems to be on the head of the team
 12 leader, effectively, to cascade any information
 13 around the team, about those kinds of issues,
 14 plus a document in a library; is that a summary?
 15 **A.** Yeah, there were procedures in place around
 16 that, yes.
 17 **Q.** Were there procedures in place? I mean, what
 18 were the procedures in place?
 19 **A.** That the team leader gained the information from
 20 the system manager and actioned it. So if the
 21 transaction correction didn't go out, it stayed
 22 as an open item on that GL account.
 23 **Q.** But I think the process you're describing is
 24 simply one of: it's on the team manager?
 25 **A.** Yes, and it was.

22

1 it could be 100 per cent when there's human
 2 intervention. There were issues and, if
 3 a branch had got an issue, they could call the
 4 person that had issued the TC to discuss it or
 5 to dispute it.
 6 **Q.** In terms of numbers, in your statement you say
 7 that there are approximately 125,000 transaction
 8 corrections a year.
 9 **A.** Yeah.
 10 **Q.** I'd like to take you to one other document that
 11 you have detailed some further figures, it's
 12 POL00006650. We'll come back to this a number
 13 of times today. This is a conversation that you
 14 had with a solicitor at Womble Bond Dickinson in
 15 2018. I think this is --
 16 **A.** Yeah.
 17 **Q.** -- related to the Group Litigation. Is this
 18 something that you remember?
 19 **A.** Only from reading it, yeah. I remember it
 20 happening.
 21 **Q.** We have at page 10, it's about halfway down on
 22 page 10, you have given other figures. You say
 23 to the interviewer at the bottom there:
 24 "We're issuing between sort of 7,500 and
 25 12,000 [transaction corrections] a week. It is,

24

1 there's quite a lot in there. Some are
 2 automatic so like your Lottery TCs, your stock
 3 TCs, we do them by upload."
 4 So, I mean, if it was 12,000 --
 5 **A.** No, it should say a month.
 6 **Q.** That should be a month, should it? Okay. Did
 7 those numbers, though, quite high numbers, did
 8 they raise any cause for concern?
 9 **A.** The majority of TCs that we issued were for cash
 10 remittances, where the cash returned by branches
 11 wasn't correct, so there was a shortage or
 12 a surplus within the pouch. And I think it was
 13 around -- I'm wanting to say between 50 and
 14 60 per cent of those TCs were related to cash.
 15 **Q.** Did that mean, where the cash figure didn't meet
 16 the figure that Horizon produced, that would be
 17 included in that figure?
 18 **A.** So it was -- yes, it was whatever the postmaster
 19 had sent back as a cash remittance to the Cash
 20 Centre --
 21 **Q.** Yes.
 22 **A.** -- and then the cash was counted in the Cash
 23 Centre under camera.
 24 **Q.** Where that figure didn't meet the figure on the
 25 Horizon printout, that was considered within
 25

1 know, around the holidays, or we had term time
 2 staff working for us, we would have additional
 3 agency staff brought in to supplement the
 4 permanent resource that we had.
 5 **Q.** Do you recall there being any analysis looking
 6 for trends or root causes of that large number
 7 of transaction corrections?
 8 **A.** Yes, there was and there was documentation
 9 around it, so what are the causes of these
 10 transaction corrections?
 11 **Q.** Yes. What kind of period: was that throughout
 12 your time in office or in a particular period?
 13 **A.** I think we did it quite regularly, where, when
 14 you look at the biggest numbers being cash,
 15 that's how can you get a branch to count the
 16 cash any different, you know, putting secondary
 17 checks in, and things like that. For areas such
 18 as Lotteries, that's when the transaction
 19 acknowledgements came in.
 20 So rather than sending transaction
 21 corrections on all the product lines, we sent
 22 transaction acknowledgements because there
 23 tended to be timing delays or timing differences
 24 when the branch took the reports off the Horizon
 25 terminal and put it in -- sorry, off the Lottery
 27

1 that percentage that you've just given?
 2 **A.** Yes, it was, and I think it's remembering there
 3 were both debits and credits, so where there was
 4 a surplus in the cash that was sent, so the
 5 branch had understated cash, as well as
 6 overstating it.
 7 **Q.** Let's say there were 12,000 transaction
 8 corrections a month. Do you think that the team
 9 was appropriately resourced to deal with that?
 10 **A.** There were various cuts within the teams along
 11 the years, so we did struggle at times with
 12 resource and we were always being targeted to
 13 reduce staffing but, as a whole, I think it
 14 became -- it was a process that we were on top
 15 of in, you know, the latter years.
 16 **Q.** Can you give us an idea you've spoken about
 17 trends and times, was it an overall downward
 18 trend in staffing numbers or were there
 19 particular times where pressure was put on you
 20 to reduce staffing?
 21 **A.** There was always or always seen to be pressures
 22 to reduce staff and efficiency processes, you
 23 know, trying to make the system more efficient.
 24 So yes, there was a downward trend of staffing.
 25 In some of the times, during peak times, you
 26

1 terminal and put it into Horizon versus when
 2 that Lottery terminal actually closed down. So
 3 the Post Office side may shut at 5.30 but the --
 4 and take a summary off Camelot, the Camelot
 5 terminal, but the terminal was still working up
 6 to 7.00, 8.00 at night. So the figures were
 7 always different on a daily basis. So --
 8 **Q.** Did anybody carry out any analysis, to your
 9 knowledge, of the impact of software errors, for
 10 example, on the percentage or number of
 11 transaction corrections that were being made or
 12 being requested?
 13 **A.** Not to my knowledge, no.
 14 **Q.** The Inquiry has heard evidence of delays in the
 15 transaction correction processes, in some cases
 16 where the system for a subpostmaster was quite
 17 slow; is that something you recognise at all?
 18 **A.** As in the Horizon system?
 19 **Q.** No, the transaction correction system, so the
 20 ability to obtain a transaction correction?
 21 **A.** Yes, I -- I think when we first went live in
 22 2005, there were a lot of issues with the data
 23 that we -- that was being input into the POLSAP
 24 system and that led to delays in transaction
 25 corrections going out --
 28

1 Q. So there was a particular problem in 2005.
2 I don't know if you heard Rod Ismay's evidence
3 on that but he raised concerns about, for
4 example, egg timers on screens and things like
5 that.

6 A. Yeah, so that's more around the staff in
7 Chesterfield had slow equipment. So it would
8 take ages for them to be able to issue
9 a transaction correction, which then the
10 productivity levels in the teams were very low
11 because of the IT that Chesterfield had --

12 Q. That's a 2005-specific issue, is it, or is it
13 a broader issue?

14 A. No, it was a broader issue and, probably even
15 around up to 2010, there were issues with the
16 kit that Chesterfield were using.

17 Q. Was that addressed?

18 A. It was, eventually, yeah. They swapped out
19 a lot of the computers within Chesterfield.

20 Q. Were you aware of other complaints from
21 subpostmasters about delays in the transaction
22 correction process?

23 A. I think, if -- we used to do a KPI that said
24 that we were issuing 95 per cent of all
25 transaction corrections within 60 days, which is
29

1 and customer. A Transaction Correction will
2 only be issued if the Client and Customer agrees
3 and these can take up to 2 years."

4 Then "Fraudulent Cash Cheques" below, it
5 says there:

6 "Transaction corrections will be issued
7 within 4 months of the transaction date."

8 So those are two cases where quite long
9 periods seem to be recognised or inbuilt into
10 the transaction correction process; is that
11 something you recall at all?

12 A. I don't by then because, as I say, my teams
13 weren't issuing transaction corrections but on
14 the 2.1.4, it all -- if there was an over or
15 an under-- usually an overpayment on the
16 automated payment bill, say, it took the client
17 to agree that, you know, we could adjust the
18 money and give the branch the money back. So if
19 they'd over-keyed a bill, it needed client and
20 customer agreement to get that money back. I do
21 find it quite astonishing that it's documented
22 there as up to two years. That does seem
23 excessive.

24 Q. So did you say 90 per cent or so would be within
25 60 days; is that --

31

1 still a long time and, you know, everyone trying
2 to get it closer to the 30 days. But we --

3 Q. How long was the trading period?

4 A. The trading period is a four or a five-week
5 period, as such.

6 Q. So if it was 60 days it would be quite
7 significantly longer than the trading period?

8 A. Yes. Yeah.

9 Q. Can we look at POL00039028, this a 2008
10 document. It's the "Operating Level Agreement".
11 It's a draft version. I don't know if this is
12 a document that you recall at all? If we scroll
13 down and perhaps look over the page.

14 It doesn't really matter if you saw this at
15 this time or not because I just want to take you
16 to an indication of the kinds of times that
17 certain provides for transaction corrections
18 seemed to take.

19 A. Yeah.

20 Q. If we look at page 6, we have there at 2.1, if
21 we scroll down, "Transaction Corrections issued
22 by P&BA". If we go over the page, 2.1.4, so
23 slightly down, it addresses "Automated Payment
24 Overpayments and Personal Banking Overpayments":
25 "These have to be queried with the Client
30

1 A. 95 per cent.

2 Q. 95 per cent within 60 days --

3 A. Yeah.

4 Q. -- albeit you recognise that that in itself is
5 quite a long period?

6 A. Yeah.

7 Q. Then the other 5 per cent, in your experience,
8 could they take significantly longer periods?

9 A. It could, yeah, I think for automated payments,
10 there was no open item. So there wasn't an open
11 item that said this is an aged item, the branch
12 reported that they'd keyed something wrong. We
13 would then have to go to the clients to try to
14 retrieve the money and the transaction could
15 only be created once we'd got the money back
16 from the clients.

17 Q. So where particular information needs to be
18 sought from the client it could take
19 significantly longer?

20 A. Yes.

21 Q. Thank you.

22 A. Or if a customer said they'd got a banking item,
23 you know, they believe they deposited X amount
24 but their account's only been credited with Y.

25 So a client -- a client, a banking client, could
32

32

1 come up back to us to say, "This is information
2 we've got", you know, "You've not credited our
3 customer enough and they've got a receipt".

4 And I think a lot of the issues were around
5 the branch potentially had not put it through
6 Horizon but they'd stamped a paying-in book or
7 something like that, and that --

8 **Q.** A lot of the things that you're mentioning are
9 potential human errors but, where a complaint
10 was made, for example, about a software error,
11 typically how long would a transaction
12 correction take to be processed?

13 **A.** Well, unless we knew about it there wouldn't be
14 one issued. So it needed to be flagged up to us
15 that one would be needed, as such.

16 **Q.** Flagged up by who?

17 **A.** By whoever was dealing with the anomalies that
18 were there. So the IT department needed to
19 confirm that there was an issue that had caused
20 a financial issue.

21 **Q.** Typically, how long would it take for that team
22 to get back to you?

23 **A.** I don't know. I can't potentially put
24 a timescale on that. I think there's only a few
25 instances that I can remember. I didn't

33

1 concerns subpostmasters trying to find out
2 whether there would be a transaction correction
3 and not receiving that information and having to
4 wait and see. Is that something that you
5 recognise at all?

6 **A.** No, because I think if they'd gone into NBSC and
7 asked specifically for Product and Branch
8 Accounting, there should have been a response to
9 that.

10 **Q.** But might the response have been "We can't tell
11 you just now"?

12 **A.** If it was the same day that they balanced, we
13 wouldn't be able to see the data, no. But --

14 **Q.** You've talked about quite long periods, up to
15 60 days for 95 per cent of cases.

16 **A.** Yeah --

17 **Q.** If you called on day 30, for example, what would
18 be the typical response?

19 **A.** That they should be able to see if there's
20 a transaction or an open item there waiting to
21 be issued, and staff --

22 **Q.** What do you mean by an "open item"?

23 **A.** An open item within the general ledger waiting
24 for a transaction correction to be either
25 investigated or/and issued.

35

1 necessarily deal with the detail of it but there
2 was a receipts and payments mismatch, and that
3 was highlighted to us, and I think Rod and Andy
4 Winn dealt with it but we were told there was
5 an issue and it was then looking at what is the
6 financial impact of that. And I believe they
7 went on to issue transaction corrections and
8 write to branches but I'm not that close to it
9 that I understood all the issues that were
10 raised.

11 **Q.** Thank you. We'll get to the receipts and
12 payments issue shortly. Was there a system in
13 place that allowed a subpostmaster to know that
14 a transaction correction would or would not be
15 issued or was it simply a case of waiting and
16 seeing?

17 **A.** In some instances, the branch -- if they rang
18 NBSC, we could in -- Product and Branch
19 Accounting could look to see if there was
20 an open item ready to be issued and issue it, or
21 it was a wait and see. So they might have
22 a branch discrepancy and be ringing up to say,
23 "Is there a transaction correction that's going
24 to come down the line?" and we would issue.

25 **Q.** Some of the evidence that the Inquiry has heard

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1 **Q.** So if you phoned up on day 30 and you were told
2 it was an open item, what kind of certainty
3 would you have as to whether a transaction
4 correction would or would not be issued?

5 **A.** If it had been investigated or it was confirmed,
6 you know, the branch said "I sent my cheques off
7 wrong", or whatever, the team would confirm it
8 and send the transaction correction out.

9 **Q.** But, again, we're dealing here in particular
10 with things like software errors. If you had
11 said there was a software error and you call up,
12 you haven't received a transaction correction,
13 and you were told it was an open item would you
14 have any certainty as to when, in fact, that
15 would be dealt with?

16 **A.** I don't think those two correlate, as such, or
17 have done. So the data that is in the system is
18 what Product and Branch Accounting or the staff
19 within Chesterfield dealt with. They didn't get
20 queries raised to say, "I've got a software
21 issue" --

22 **Q.** Are you saying that no subpostmasters in the
23 context of transaction corrections raised issues
24 of software issues of potential software issues?

25 **A.** No. Not to do with transaction corrections, is

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1 my belief, no. There may have been some issues
2 or some issues in sending TCs out but not the
3 Horizon system being at fault or a system issue
4 in Horizon.

5 **Q.** So at no point while you were responsible for
6 the transaction corrections process or for
7 managing that process, were you aware of
8 complaints about the Horizon system that may or
9 may not require a transaction correction?

10 **A.** No. Only on a very few occasions, in which case
11 (*unclear*) were involved.

12 **Q.** Knowing what you know and how long you've been
13 involved and the fact you were involved, even in
14 the early stages of the litigation, do you find
15 that surprising that you were never informed
16 about that?

17 **A.** Yes. I think it's -- if there were more bugs
18 and defects, et cetera, it's were Product and
19 Branch Accounting and Transaction Processing
20 joined up on that?

21 **Q.** I think we're struggling -- what we may struggle
22 to understand is how complaints about the
23 Horizon system causing discrepancies,
24 discrepancies that require transaction
25 corrections, didn't reach the person that was

37

1 accepted a transaction correction and didn't put
2 the cash in, that would lead to a branch
3 discrepancy.

4 **Q.** Thank you. I'll deal with the issue of
5 discrepancies shortly. Perhaps we'll move on to
6 the suspense account because I think that
7 addresses this particular issue. What did you
8 understand a suspense account to be?

9 **A.** As in a local suspense account --

10 **Q.** Yes.

11 **A.** -- within the branch?

12 **Q.** Yes.

13 **A.** I think it changed in 2005. So, pre-2005, I'm
14 led to understand that a branch could leave
15 something in local suspense for a while, and it
16 was authorised out in the regions, I think.
17 Chesterfield didn't do the authorisation.

18 After 2005, the local suspense is still
19 there on a weekly basis but at branch trading,
20 on week 4 or 5, they had to clear the local
21 suspense and either put the cash in or settle
22 the amount centrally.

23 **Q.** Thank you. Can I just take you to your
24 statement on this just so we can see a small or
25 perhaps maybe insignificant difference between

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1 responsible for managing those transaction
2 corrections. Are you able to assist us at all
3 with that?

4 **A.** No, I think the only time -- if a branch that
5 got a branch discrepancy and they settled it
6 centrally, they could raise it then, that they
7 believe there was an issue. But it's what
8 support we could give or what NBSC could give in
9 trying to find out why there was a branch
10 discrepancy.

11 **Q.** During that investigation, presumably
12 a transaction correction hadn't been issued?

13 **A.** It could have been, and -- so the branch could
14 have been issued a transaction correction for
15 a debit, so you have not put this much cash in
16 your till. If they then accepted that, so like
17 the Lotteries, they accepted a transaction
18 correction for £1,000, but they didn't put the
19 cash into the till, that would then, when they
20 were balancing, form a £1,000 discrepancy that
21 they then could put -- settle centrally. And
22 that happened on a-- quite a few occasions.

23 So the branch should have had £1,000 sat in
24 the retail till for the lottery but they didn't
25 transfer it into their Horizon till and, if they

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1 the evidence you're giving and the evidence of
2 Susan Harding on this issue. It's WITN06120100
3 and it's page 15, paragraph 30. It says:

4 "Susan Harding states that the local
5 suspense account which had previously been
6 available to [subpostmasters] to hold losses
7 until they removed them, is said to have been
8 removed. The Local suspense is actually still
9 available to branches to use when they complete
10 their daily/weekly balance, but it is not
11 available to hold losses or surpluses for long
12 periods of time or on a permanent basis as
13 branches may have done previously."

14 So I think you are agreed with the essential
15 point that the IMPACT Programme, in essence,
16 meant that subpostmasters were required to
17 either accept the debt or cease trading when it
18 came to the end of the trading period and, in
19 that sense, they couldn't hold any money in
20 a suspense account; is that a fair summary?

21 **A.** That's correct, yeah. They could settle the
22 amount centrally.

23 **Q.** Yes. So they had to accept it or settle it
24 centrally --

25 **A.** Yeah.

40

1 Q. -- or they had to stop trading, essentially?
 2 A. Well --
 3 Q. I mean, those are the only options?
 4 A. Well, they wouldn't -- the option was that they
 5 didn't roll the branch trading statement.
 6 Q. Which would have, in effect, meant --
 7 A. Pardon?
 8 Q. Which would, in effect, mean that they couldn't
 9 continue to trade?
 10 A. Well, they could trade, yeah, even without doing
 11 a Branch Trading statement.
 12 Q. How could they do that?
 13 A. It just continued.
 14 Q. Pardon?
 15 A. It just continued.
 16 Q. They'd have to --
 17 A. It --
 18 Q. I mean, the Horizon system would not let them
 19 continue if they didn't complete that --
 20 A. It did.
 21 Q. So --
 22 A. There were branch -- they had not completed
 23 branch trading, so one of the controls within
 24 Chesterfield is to check after the branch
 25 trading period for the branch if there are items

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1 loss or take out the gain.
 2 Q. If they didn't do any of those options, what
 3 could they do? Is your evidence that they could
 4 continue to trade despite that, if they did
 5 neither of those options?
 6 A. If they didn't complete a branch trading
 7 statement but, if they completed the branch
 8 trading statement, they had no option other than
 9 to either put the cash in, take the cash out or
 10 settle centrally. If, at the end of the branch
 11 trading, they continued then into another
 12 trading period and didn't put the cash in, it
 13 would be classified as a rolling loss, so a loss
 14 from one period in a the next period.

15 And such as originally, the -- like, the
 16 branch conformance team would check for rolling
 17 losses, where a loss appeared to be getting
 18 larger and larger but not declared.

19 Q. Thank you.
 20 So can I give you a scenario. If you
 21 postmaster had identified a cause of
 22 a discrepancy and was waiting for a transaction
 23 correction but it hadn't yet been received,
 24 could they complete their branch trading
 25 statement?

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1 left in local suspense. If there are, that
 2 would indicate that the branch has not rolled
 3 their branch trading period.
 4 Q. That would begin your actions to begin debt
 5 recovery?
 6 A. No, that would -- it would be an escalation
 7 route to get the branch to actually complete
 8 their branch trading --
 9 Q. So where Susan Harding says that the suspense
 10 account isn't actually available at the end of
 11 the trading period, or at least at the end of
 12 the trading period, is that wrong? I mean,
 13 where would you put these figures? Where would
 14 they go?
 15 A. No, it was -- it's available on a weekly basis
 16 so I think Sue said that the local suspense was
 17 removed and it wasn't removed so, over a trading
 18 period, a branch may on the first week have
 19 a surplus and the second week have a loss, and
 20 they could be aggregated together to a net. So
 21 they --
 22 Q. But at the end of that trading period what was
 23 the option?
 24 A. Any discrepancies, if they're over £150, they
 25 could settle them centrally or make good the

42

1 A. Yes, but they'd have to declare a loss or
 2 a gain. So they could say, the £1,000 scenario,
 3 "I've got a difference at the end of branch
 4 trading, I know it's going to be a transaction
 5 correction", and they could settle it
 6 centrally --
 7 Q. Are they then putting themselves at risk of
 8 facing debt recovery action?
 9 A. Yes. But if -- letters went out to postmasters
 10 on the amounts held in their customer account
 11 and they could say, "I'm waiting for a TC", and
 12 the operator who was dealing with the customer
 13 account could get in touch with the issuing
 14 teams to say "There's a transaction correction
 15 on this, can we have it issued, please?"
 16 Q. Where a subpostmaster hadn't completed their
 17 branch trading, did that instigate action from
 18 your team to start investigating? Was that one
 19 of the things that started an investigation?
 20 A. If -- yes. If there was an item in local
 21 suspense after branch trading cut-offs, the team
 22 would escalate it and find out is there
 23 a problem -- has the branch shut down? Has
 24 there been a fire in branch? What is the reason
 25 for the non-completion of a branch trading

44

1 statement?

2 **Q.** So --

3 **A.** So they would essentially put it out into the
4 network to ask questions, what's happening here,
5 and monitor the levels that were in local
6 suspense.

7 **Q.** So I think, if I'm to understand correctly, your
8 evidence is that you could continue trading but,
9 from that moment onwards, you would effectively
10 be under investigation or you would have
11 triggered an investigation?

12 **A.** Could have triggered one, yes.

13 **Q.** Thank you. Can we look at paragraph 32 of your
14 statement it's WITN06120100.

15 **A.** Yeah.

16 **Q.** It's page 15, paragraph 32. So we're looking
17 now at when that investigation has been
18 triggered.

19 **A.** Yeah.

20 **Q.** This is your description of what that
21 investigation would involve. So you say there:
22 "FSC investigation/escalation would be
23 focused on", and it sets out the various things
24 it would be focused on.

25 **A.** Yeah.

45

1 intervention was required."

2 **A.** Yeah.

3 **Q.** So those are quite limited circumstances. Am
4 I right in saying that none of your
5 investigations involved the investigation of
6 software issues, as far as your department was
7 concerned?

8 **A.** I don't believe it did, no. If the -- if the
9 terminal had been removed, it could be said that
10 there were problems with the kit but it wouldn't
11 necessarily be that was showing up to us. It
12 was a case of we'd got an item in local suspense
13 and it had not been cleared, but not the ins and
14 outs of if a terminal wasn't working what was
15 the matter with it and why had they had
16 a swapout.

17 **Q.** Trying to get to the bottom of a discrepancy,
18 for example, to enable you to issue
19 a transaction correction, it doesn't seem that
20 that was in any way part of that exercise that's
21 set out from (a) to (d)?

22 **A.** No.

23 **Q.** Following an investigation, what were the
24 options available? Was it a binary issue of
25 issuing a transaction correction or not issuing

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1 **Q.** First:

2 "Escalation to the Network Teams to enable
3 branch training to complete the branch trading
4 statement ..."

5 If we could scroll down:

6 "Understanding if there was a fundamental
7 problem with the Horizon kit in branch and the
8 branch was closed, [for example] had it been
9 permanently damaged in branch (by a fire) ..."

10 So one of the things that you would
11 investigate was whether the kit was -- there was
12 a fundamental problem. Am I right that that is
13 intentionally distinguishing it from something
14 like there being a software problem?

15 **A.** I think it is, yeah, because it's quite
16 fundamental if there was a fire in branch and it
17 had destroyed the kit.

18 **Q.** "If the Horizon kit had been removed from the
19 branch due to problems with the terminal and
20 balances had not been completed. (FSC would not
21 be involved in the reason why the kit had been
22 removed or have [investigated] its removal) ..."

23 Then (d):

24 "Establishing if the branch had unexpectedly
25 closed without balancing and Network support or

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1 a transaction correction?

2 **A.** Not in local suspense. Predominantly it was
3 around getting the branch to roll the trading
4 period to declare their own discrepancy.

5 If it was caused by a fire or something
6 else, there could be an option to write off the
7 value and not pursue it or gaining intervention
8 or training from the Network to support the
9 postmaster in completing a branch trading
10 statement.

11 **Q.** But, in terms of the transaction corrections
12 were the options, essentially, you're going to
13 get --

14 **A.** We didn't issue -- we didn't issue transaction
15 corrections on local suspense.

16 **Q.** Putting aside the local suspense issue, just
17 talking about your investigations, the
18 investigations carried out by your team, can you
19 assist us with what was the end result of
20 an investigation: was it one of we will issue
21 a transaction correction or we won't issue
22 a transaction correction? Was there anything in
23 between?

24 **A.** The transaction correction came about because of
25 an open item on a general ledger. So they would

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1 issue, if there was an open item, ie the two
2 product streams didn't match or they'd raised an
3 enquiry and we'd received money back from
4 clients or banks to enable us to issue
5 a transaction correction. So it wasn't
6 arbitrary, "We'll just issue one". If you
7 issued a transaction correction without there
8 being an open item, it would create an open item
9 on the ledger that needed actioning.

10 **Q.** What would be the next step from there?

11 **A.** If they did issue one?

12 **Q.** If they didn't issue one.

13 **A.** If they didn't issue one, it would be an open
14 item that would be monitored at our weekly
15 meetings: why has it not been cleared or issued?

16 **Q.** Can I look at paragraph 36 of your witness
17 statement it's WITN06120100 and there's
18 a passage in there that I'd just like your
19 assistance with. It's about halfway down. It
20 says:

21 "A postmaster could dispute a [transaction
22 correction] even if they had accepted/settled
23 centrally the [transaction correction], which
24 would usually have been due to branch trading
25 time constraints."

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1 investigations that were carried out by your
2 team were rather limited.

3 **A.** That was local suspense, that was totally
4 different to transaction corrections.

5 **Q.** Okay, thank you very much. So in terms of
6 transaction corrections, what kind of
7 investigations would take place in relation to
8 alleged software errors?

9 **A.** I don't see correlation between that.

10 **Q.** Well, if a subpostmaster said that there is
11 a discrepancy due to a software error, in what
12 circumstances would their debt be able to be
13 blocked, if there was no investigation into that
14 software error?

15 **A.** So if the postmaster came back to us and said,
16 "This transaction correction is incorrect,
17 I believe the Horizon figure is incorrect", then
18 Andy, the relationship manager --

19 **Q.** Is that Mr Winn?

20 **A.** Mr Winn, yeah -- would take that up and try and
21 get it resolved with the IT suppliers.

22 **Q.** Were you involved in that process at all?

23 **A.** Not in the nitty-gritty of it, no. All Andy's
24 disputes that came in were in writing. So that
25 we understood what the postmaster was trying to

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1 When you say, "branch trading time
2 constraints", do you mean the need to enter the
3 next trading period or is that something else?

4 **A.** Yes. So if they'd received a transaction
5 correction two days before branch trading, they
6 didn't investigate it, they could settle it
7 centrally and then request, when the team rang
8 up or when the team sent the letters around,
9 "You have this transaction correction on your
10 account", they could say, "But I want to dispute
11 it".

12 **Q.** You then say that a relationship manager could
13 block the debt. Can you assist us with blocking
14 the debt and what that means?

15 **A.** So if they a postmaster had settled an item
16 centrally, there was a blocking option to say,
17 "Do not chase on this debt". So if somebody had
18 said, "I'm going to dispute this", there was
19 a blocking code put on the line within the
20 customer account and the debt wasn't chased.

21 **Q.** So a blocking would occur, am I right in
22 thinking, only if an investigation was taking
23 place?

24 **A.** Yes.

25 **Q.** For those reasons we saw earlier, the

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1 convey the issue was.

2 **Q.** So every time --

3 **A.** So --

4 **Q.** -- there was a software issue raised by
5 a subpostmaster, that would be in writing?

6 **A.** No, it's a totally different thing to
7 a transaction correction.

8 **Q.** Well, if somebody is seeking a transaction
9 correction, would like a transaction correction
10 because there's a discrepancy caused by
11 a software error ...

12 **A.** How would they know it's caused by a software
13 error?

14 **Q.** Well, we'll absolutely come to that.

15 **A.** Yeah, and that's -- I think that's where I'm
16 struggling because the team in Chesterfield were
17 just processing the data that they'd got, so
18 what had come in from Horizon and what had come
19 in from clients.

20 If the -- if a postmaster said, "That
21 Camelot data is incorrect, I keyed this into
22 Horizon", or whatever, we would go back to
23 Camelot for evidence that that's what had
24 happened on that terminal but it wouldn't be
25 a software issue.

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1 Q. So if they said, "There is an error there in the
2 Camelot issue, I think it's down to a software
3 error", would they be able to block the debt or
4 not?
5 A. But I don't believe it would be down to
6 a software error. If they'd not keyed --
7 Q. How do you reach that conclusion?
8 A. If they'd not keyed the amount into Horizon from
9 the end-of-day Camelot slip, there would have
10 been differences between what Camelot said
11 they'd completed on that terminal versus what
12 the postmaster input into the Horizon till.
13 Q. So am I right in thinking that, as part of the
14 transaction correction process, so far as your
15 department was concerned, software errors just
16 didn't feature in that process?
17 A. I don't think it did, greatly, no, and the level
18 of disputes we had on transaction corrections
19 were very low.
20 MR BLAKE: Thank you, sir. That might be
21 an appropriate time to take our mid-morning
22 break. Could we come back at 11.30?
23 SIR WYN WILLIAMS: Yes, certainly. So feel free to
24 have a wander around wherever you are,
25 Ms Bolsover, and just come back by 11.30, all
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1 says:
2 "Determine the legal skills required by
3 Product and Branch Accounting for managing debt
4 recovery processes."
5 It has your name next to it.
6 A. Yeah.
7 Q. Can you assist us with that?
8 A. I think it was highlighted as a -- there was
9 a gap there that the team were there to process
10 information and recover the debt amount but
11 didn't have the legal skills or terminology. So
12 if solicitors were coming back to the team with
13 a long-winded email, they didn't always
14 understand the terms, and I believe the steps
15 taken was workshops with -- and I can't remember
16 whether it was Bond Dickinson or other legal --
17 legally qualified people to do workshops with
18 the team to enable them to gain an understanding
19 of the processes for moving to civil recovery.
20 Q. We've heard some evidence of the size of the
21 Legal team being reduced at the Post Office.
22 Would this be around this time or was that some
23 other time, to your recollection?
24 A. I don't know. We were gaining input or passing
25 cases to the Royal Mail Legal team to pursue
55

1 right?
2 THE WITNESS: Yes, thank you.
3 (11.10 am)
4 (A short break)
5 (11.30 am)
6 MR BLAKE: Thank you, sir, can you see and hear me?
7 SIR WYN WILLIAMS: I can, thank you, yes.
8 MR BLAKE: Thank you very much.
9 I'm going to move on to the topic of
10 recovery of debts. Can you assist us with what,
11 if any, legal experience those who were charged
12 on a day-to-day basis with recovering debts had?
13 A. None.
14 Q. Can we look at POL00084996, please. This is
15 a presentation from 2009. If we go over to
16 page 2 -- do you recall this workshop at all?
17 A. I think I do, yes.
18 Q. What were the circumstances? If we go back to
19 page 1, then. Sorry, it might assist. Do you
20 remember the purpose of it?
21 A. Yeah, I think it was around the efficiency
22 programme to reduce staffing levels within
23 Chesterfield.
24 Q. If we go over the page, there's a heading there
25 "Legal Skills", on the left-hand side, and it
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1 debt recovery, so it -- at the point of we can't
2 recover this debt then we would seek legal
3 support to then chase the debt until Legal
4 Services Royal Mail and Post Office split, and
5 then work was undertaken by myself and, I think,
6 Rebekah Mantle to set down what steps should be
7 taken and to gain a fixed price pricing, as
8 such, for the work that needed undertaking.
9 Q. Thank you. Sticking with this document, we see
10 there Mandy Talbot's name mentioned quite a lot,
11 "Solicitor Service Improvements". She's to
12 "Create a checklist of evidence required by
13 solicitors":
14 "Solicitor Service Improvements
15 "Develop standard checklist of information
16 provided to solicitors."
17 If we keep on going over the page, we see
18 your name mentioned together there, "Use of
19 local Solicitor Services":
20 "Investigate viability of using local
21 solicitors (ie for low value debt) where it is
22 uneconomical to pursue the debt using existing
23 external Solicitors."
24 What did you understand Mandy Talbot's role
25 to be?
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1 A. She was the internal lawyer, as such, that we
2 went to.

3 Q. Her name is mentioned quite a lot. Are we to
4 read into that any particular level of
5 responsibility that she may have had on a policy
6 side or taking --

7 A. I'm unaware of that. All she was seen as is
8 another interface for us to then gain support to
9 recover the debt. So, from a legal aspect,
10 sending letters before action out, et cetera,
11 and/or passing on to an external solicitor.

12 Q. But something like investigating the viability
13 of using local solicitors which are both tasked
14 as the lead role, in carrying out that kind of
15 work, did you see Mandy Talbot as simply a case
16 worker who handled cases or something else?

17 A. She was a touch point for us, so I didn't really
18 know her position, as such.

19 Q. Did she give you any indication --

20 A. (*Unclear*) that didn't happen. We didn't.
21 I think there was some suggestion that we would
22 put cases of a low value into court ourselves
23 and -- of which I said that wasn't feasible.
24 You know, we weren't experienced in lodging
25 claims for money, not within Chesterfield.

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1 from the branch or the postmaster, or they
2 pointblank refused to pay, rang us up and said
3 they weren't prepared to pay it, the debt would
4 be referred to the Contracts Advisers.

5 Q. So when we spoke before the break about the
6 IMPACT Programme, et cetera, and the fact that
7 a subpostmaster would settle centrally, even in
8 cases there the discrepancy was caused by
9 a software error, that would then trigger this
10 process where they would then be sent a letter
11 within a week?

12 A. If the debt was set on the customer account
13 which was the individual to the branch and
14 postmaster, then the letters would say to
15 contact us and discuss it or discuss it with the
16 agent that was dealing with that debt. But if
17 they just pointblank either didn't respond, then
18 it would be passed to the Contracts Adviser to
19 discuss it over the telephone with the
20 postmaster.

21 Q. I think you said there were three different
22 letters. Were they increasing in escalation?

23 A. As such, yes. Yeah, "We've not heard from you".
24 They were rewritten, the letters were rewritten
25 as part of the -- I believe the Branch

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1 Q. Ignoring that particular issue, was Mandy Talbot
2 someone who you saw as having decision-making
3 power or something else?

4 A. I did, yeah, from a legal aspect, yes.

5 Q. How about from a policy aspect or something
6 slightly wider than a legal aspect?

7 A. I don't know.

8 Q. Thank you. That can come down. I want to ask
9 you about -- I think it's the Dunning Process,
10 is that correct? I think it's set out in your
11 witness statement?

12 A. Yeah.

13 Q. Can you tell us what the Dunning Process is?

14 A. Once a debt is created on POLSAP, so if
15 a postmaster settled centrally a transaction
16 correction or a branch discrepancy, the Dunning
17 Process started one week -- automated one week
18 after branch trading, letters would be sent and
19 statements to the branch to say "This debt is
20 outstanding".
21 So it was done over three letters,
22 I believe. One seven days after branch trading
23 and then one 21 days after branch trading.
24 I think that's it for the current agents. There
25 was two. And if we'd got either no response

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1 Efficiency Programme, so there was different
2 wording put in each letter.

3 Q. When you say rewritten, to become more or less
4 confrontational, aggressive, or?

5 A. Potentially less, but I'm wondering whether that
6 actually happened. The letters were passed
7 through Legal and Communications teams. So --

8 Q. You described in your statement that there are
9 separate processes for current agents and former
10 agents. Very, briefly can you tell us the
11 differences?

12 A. Yeah, well, we couldn't then depend, if it was
13 a former agent that had left the business, then
14 there was no contact via the Contracts Managers.
15 So it was the same Dunning Process, letters sent
16 out at different intervals, and then it might be
17 a third letter, which was a letter before
18 action. So we could potentially be pursuing
19 civil recovery.

20 Q. In respect of writing off debts, in what
21 circumstances would debts be written off during
22 this process?

23 A. For the former agents?

24 Q. For either.

25 A. If an administrator said there was an issue with

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1 the debt and they would document the issues
 2 raised and request a write-off by their team
 3 leader, and it was done on an authority level.
 4 So if there were problems identified, then the
 5 individual could pass it to the team leader or
 6 to myself to seek authority to write off.

7 **Q.** Problems identified by who?

8 **A.** By the branch calling the Current Agents Team or
 9 the Former Agents Team being unable to trace the
 10 former subpostmaster. They could put
 11 recommendations in to write off because it
 12 wasn't viable to pursue.

13 **Q.** So we have a circumstance where they can't be
 14 traced, that's one case in which it would be
 15 written off. Can you give us some more examples
 16 of typical circumstances where debts would be
 17 written off?

18 **A.** If we'd gone into using a solicitor, they might
 19 say "This is not worth pursuing, there's no
 20 assets". So you would only be securing
 21 a judgment for judgment's sake. I think it was
 22 later that we determined this is, you know,
 23 it's -- we're spending an awful lot of money
 24 trying to get something back for what? To no
 25 gain. So that process was reviewed but I can't

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1 the values that we wrote off each month and each
 2 write-off would be backed up with a reason and
 3 a paper around it of why we should write this
 4 debt off.

5 **Q.** So would there be a statistic that could tell us
 6 how many debts were written off because
 7 subpostmasters had raised complaints about the
 8 software?

9 **A.** No. I don't believe so.

10 **Q.** Your experience was that it wasn't until the
 11 *Bates & Others* Group Litigation that people were
 12 making complaints about the software that were
 13 escalated --

14 **A.** No.

15 **Q.** -- to your team?

16 **A.** No, because I believe the Justice for
 17 Subpostmasters Alliance, that started raising
 18 the initial issues, and then there were MPs'
 19 cases, mediation cases so there were various
 20 places that things were coming in and we were
 21 asked "Is there debt on these accounts?" And we
 22 would then feed back "We've got this debt" and
 23 we would be told to hold recovery and, again,
 24 put a block in on the debt, if we were told that
 25 there was an issue.

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1 remember the date it was reviewed, but it could
 2 be that "It's going to cost you this much to
 3 pursue this debt, are you prepared to spend that
 4 much?"

5 **Q.** So we have can't trace, we have to effectively
 6 a waste of the Post Office's money to pursue.

7 **A.** Yeah.

8 **Q.** Any other circumstances?

9 **A.** Or not economical to pursue, yeah. There could
 10 be varying scenarios. It depended what came up,
 11 you know, what circumstances there were.

12 **Q.** In your experience or to your recollection, at
 13 this stage, so the Dunning Process stage, prior
 14 to it moving to solicitors, how often would
 15 a debt be written off in the case of, for
 16 example, a subpostmaster who complained about
 17 a software error with Horizon?

18 **A.** I think prior to the court case, we had very
 19 little escalation that it was Horizon or
 20 software issues. It was only after the
 21 judgment, the *Alan Bates* litigation, that we got
 22 people saying it was Horizon. So there were
 23 very few numbers, I believe, prior to that.

24 I can't give you numbers on how many were
 25 written off. The stats would all be there on

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1 **Q.** Do you find it surprising now, given what you
 2 now know, that, during your time in this role,
 3 nobody said that, as part of the Dunning
 4 Process, as part of that increase in escalation
 5 to recover funds, people were raising bugs,
 6 errors or defects or software problems with
 7 Horizon? Is it surprising to you that that
 8 didn't reach you, that message?

9 **A.** Yes.

10 **Q.** Why do you think that is?

11 **A.** I don't know, in all honesty. We had very few,
 12 you know, say that -- if we were told "it was
 13 this", then we would investigate it. But, for
 14 my recollection, I can't remember that happening
 15 and I think I've said in my statement I'm very
 16 surprised that the evidence given to say Fujitsu
 17 were amending postmasters' accounts, that
 18 that --

19 **Q.** Had the facility to amend subpostmasters'
 20 accounts?

21 **A.** Had the facility, yes. And I think
 22 I potentially knew something could be done but
 23 it was under a controlled process.

24 **Q.** But if there were -- if there was a pattern of
 25 complaints during this recovery process, where

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1 subpostmasters were saying "I know you're saying
2 X equals Y or X should equal Y but, in fact, the
3 numbers there are wrong and it's because of the
4 Horizon system", and that simply wasn't reaching
5 you in any kind of pattern or trend, what's gone
6 wrong there?

7 **A.** The communication from wherever it's been
8 reported. So if it was a financial loss or they
9 wanted a transaction correction, say, and prove
10 that there was a system issue, then the
11 communication lines appear to have broken.

12 **Q.** All of those administrative officers who were
13 dealing with the transaction corrections
14 process, those who were dealing with the
15 recovery process, you were their manager?

16 **A.** Yeah.

17 **Q.** Were they not raising these issues with you?

18 **A.** They were asked to, if they were being raised to
19 the individuals, yeah.

20 **Q.** Were you regular meetings at which those topics
21 were raised?

22 **A.** I can't think of regular meetings but I know,
23 internally with the Legal Services Team, Rodric
24 Williams, et cetera, we had discussions on the
25 cases that we held or, if a postmaster raised it

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1 **Q.** Nowhere, to your recollection, prior to that
2 campaign, was a debt written off because of
3 a complaint about a bug, error or defect or
4 other software issue with Horizon?

5 **A.** Not to my knowledge, unless we'd been requested
6 to write a debt off. So within the business,
7 people could come to us and say, "Please write
8 these figures off because of X, Y and Z", and
9 that was the part of the case that we used to
10 control the write-offs.

11 **Q.** You were the manager of this team?

12 **A.** Yeah.

13 **Q.** To the best of your knowledge and recollection,
14 you don't recall anyone coming to you and
15 saying, "I have written off this debt", or, "Can
16 this debt be written off because the
17 subpostmaster is complaining about the Horizon
18 system and there might be something in it"?

19 **A.** I can't say that there would be none. I just
20 can't recollect any.

21 **Q.** I've said prior to the Justice for
22 Subpostmasters campaign, how about after? When
23 was the first case that you can recall that was
24 actually written off during this pre-litigation
25 phase, due to an allegation about the Horizon

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1 that it was a Horizon issue, it was fed over to
2 Legal.

3 **Q.** Your evidence is that that was exceptionally
4 rare?

5 **A.** Yeah. I think the biggest chunk of work was the
6 Justice for Subpostmasters and that was around
7 former agents debt that we raised -- we were
8 told which postmasters it was that had raised
9 it, and we sent copies of the files that we held
10 over to Legal Services, if we held the file.

11 **Q.** Prior --

12 **A.** (Unclear) postmaster --

13 **Q.** Sorry, we'll get to all of those documents but,
14 prior to the Justice for Subpostmasters
15 campaign, can you recall debts ever being
16 written off in respect of a subpostmaster who
17 said that the debt was actually just an apparent
18 debt that was caused by a bug, error or defect
19 or software failure with Horizon?

20 **A.** No, it doesn't stick in my mind that that was
21 raised no.

22 **Q.** It doesn't stick in your mind that it was ever
23 written off?

24 **A.** They may have been written off but we sought
25 reasons for debts to be written off. So --

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1 system?

2 **A.** I think during the mediation sessions that
3 happened, we were requested to write debt off.

4 **Q.** So --

5 **A.** So --

6 **Q.** -- are we talking 2013, 2015, 2018?

7 **A.** 2013, I think. So we would be advised "Don't
8 pursue this debt, please write it off".

9 **Q.** Was that the first period really when you became
10 aware of issues?

11 **A.** We didn't -- I didn't necessarily know what the
12 issues were. We weren't privy to the mediation
13 sessions that happened or the reasons for it.
14 We were just told "This is a mediation case,
15 please write it off under the authority of
16 Angela".

17 **Q.** Thank you. Where debts weren't written off,
18 I think you've said in your statement that you
19 would then liaise with the lawyers, and Mandy
20 Talbot is a name you've mentioned in particular?

21 **A.** We would liaise on the case, on the pursuit of
22 it. If there was no recovery from it then it
23 would potentially go for a write-off -- as
24 a write-off recommendation and be written off.
25 If it wasn't worth pursuing or unable to pursue.

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1 Q. But at some point during that Dunning Process
 2 the lawyers would become involved. Which stage
 3 was that?
 4 A. After we'd sent at least two letters out to the
 5 branch -- to the ex-postmaster, if we --
 6 Q. Then I think you say a pre-action letter was the
 7 third letter; is that right?
 8 A. Yeah.
 9 Q. Was that drafted by Mandy Talbot and the Legal
 10 team?
 11 A. I believe it was in the early days pre-the split
 12 of Royal Mail.
 13 Q. Can we look at POL00006650. This is the
 14 interview with Womble Bond Dickinson that I've
 15 already taken you to and I'd like to look at
 16 page 30 of that. I'm afraid I'm going to read
 17 a fair bit of this transcript. I'm going to
 18 start at the bottom of page 30. So "VB" is the
 19 interviewer, Victoria Brooks, and "AB" is
 20 yourself. She says:
 21 "We've talked a bit -- and now I need to
 22 know a bit about civil claims and recoveries
 23 action which is definitely more you.
 24 "AB -- Yep.
 25 "VB -- ... we've talked ... about the
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1 became, in my view, uneconomical to go for
 2 judgment on some of the cases because it was
 3 costing us too much to do that.
 4 Q. So where you describe it before as basically
 5 a commercial decision, was that the core to your
 6 thinking in respect of actions, that they were
 7 ultimately commercial decisions and to be
 8 approached in that way?
 9 A. Yes.
 10 Q. She says:
 11 "Ok.
 12 "AB -- ... into not doing it.
 13 "VB -- So you used to just go for it all the
 14 time.
 15 "AB -- If we would go for Judgment erm and
 16 I would say 95% of the time would get into the
 17 default so it's then -- you've got on it record.
 18 "VB -- Yeah.
 19 "AB -- We've got an option of [then
 20 something] years."
 21 So was it important to get a judgment and to
 22 get a finding on record against the
 23 subpostmaster?
 24 A. I think that was the view in the early days,
 25 yes.
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1 procedure for bringing a claim, erm so is it
 2 it's basically a commercial decision as to
 3 whether or not to bring a claim based on whether
 4 or not you think they're going to get the money
 5 back."
 6 Over the page. You say:
 7 "Yeah -- in the past we've always gone
 8 Judgment if we can -- if we think we've got
 9 a good enough case we've gone for judgment."
 10 "VB -- And was that always the commercial
 11 decision about whether you get the money back or
 12 was it more, was it more because sometimes erm
 13 I think about the Post Office specifically but
 14 some clients are like no they owe us money we're
 15 going for the Judgment, doesn't matter about the
 16 cost and someone will be like you know we're not
 17 actually going to get money at the end of it so
 18 we're not going to do that. Does that change?"
 19 "AB -- I think we've been swayed by this
 20 action ..."
 21 Can you just assist us with that? What do
 22 you mean there?
 23 A. I think in the past we did go for judgment,
 24 irrespective of whether there were any -- it
 25 would come to fruition on a payment. But it
 70

1 Q. "AB -- And we've got some leverage if they get
 2 a job, attachment of earnings, etc.
 3 "VB -- Yeah.
 4 "AB -- And if they got property you would
 5 definitely ...
 6 "VB -- Yeah.
 7 "AB -- ... to try to get it secured even if
 8 they have got kids in there or whatever and by
 9 this time we've had erm changes come to fruition
 10 after 30 years.
 11 "VB -- Really.
 12 "AB -- ... which we didn't know we'd got.
 13 So Royal Mail used to put our charges on.
 14 "VB -- Oh right.
 15 "AB -- And now we are having to ask them to
 16 lift this charge, we also have people dying and
 17 no charge change and debt not being paid so
 18 there were a case the other week, he died in
 19 2009. The family have just continued, so they
 20 can't [something] anything.
 21 "VB -- So they didn't sell the property or
 22 prove the will or whatever they'd have needed to
 23 do and then.
 24 "AB -- Why I don't know so why they've done
 25 nothing from a, you know. I don't know. I find
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1 it very interesting.

2 "VB -- That is very interesting.

3 "AB -- Yeah. And I did want to go for more

4 than Roderic wanted to go for.

5 "VB -- Yeah [laughs].

6 "AB -- He looks quite happy with himself for

7 120,000 I think."

8 Was this the attitude towards subpostmasters

9 and recovery of debts in terms of, for example,

10 there's reference there to try and get secured,

11 even if they've got kids. There seems to be

12 a slight lack of sympathy in the approach that's

13 taken; do you agree with that?

14 **A.** Potentially, yeah. It was a debt that was

15 outstanding to the business, a loss.

16 **Q.** Can we go on to page 33, please. About halfway

17 down, the interviewer says:

18 "... what involvement does your team have

19 with actually if at all looking at the contracts

20 when they're considering recovering shortfalls

21 from either formal or current Postmasters. Do

22 they ever look at the actual contracts for those

23 individual Postmasters or is it more of a 'this

24 is our process based on those contracts'.

25 "AB -- All contracts say they should pay the

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1 the interviewer says, "In one way or another

2 they've got to pay the money back".

3 **A.** I think it's only come to light to me since

4 watching some of the testimonies that have come

5 on through the Inquiry. I think the viewpoint

6 was that all losses should be paid and I do take

7 it that, you know, if they were caused by

8 software issues, then they are not caused by the

9 branch but I think the view, from a business

10 point of view, was the debt was there and it was

11 owed, and the team that we had were processing

12 debts.

13 **Q.** If we look at POL00000246, please. If we start

14 at the first page to see what it is we're

15 looking at. It's the "Community Subpostmasters

16 Contract" and if we look at page 71 -- if you've

17 seen other evidence you may well have seen

18 witnesses being taken to this particular

19 paragraph -- it's paragraph 12, which says:

20 "The Subpostmaster is responsible for all

21 losses caused ..."

22 Then it limits it:

23 "... through his own negligence,

24 carelessness or error, and also losses of all

25 kinds caused by his Assistants. Deficiencies

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1 losses.

2 "VB -- They do.

3 "AB -- So irrespective of which contact

4 they've got they should be paying the losses.

5 "VB -- Fine, that's fine. I thought that

6 would be the answer but erm.

7 "AB -- We would, we would gain a copy of

8 contract and have it in the file from the former

9 agent's point of view.

10 "VB -- Yeah.

11 "AB -- But from a current agent's point of

12 view they owe us the money.

13 "VB -- Yeah, and it doesn't really make

14 a great deal of difference because.

15 "AB -- What contract they are on now.

16 "VB -- Ok, so looking at the contracts and

17 probably more what the contract advisers don't

18 do if it's more of a problem that might justify

19 suspension or termination but other than what

20 you're doing because you're right, they do all

21 say in one way or another that you've got to pay

22 the money back."

23 Do you recognise that that isn't actually

24 correct in terms of -- you've said there "All

25 contracts say they should pay the losses" and

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1 due to such losses must be made good without

2 delay."

3 Do you recognise, looking at that and

4 looking at your account in the 2018 interview,

5 that, in fact, the suggestion that was made in

6 that interview was, in fact, wrong, in terms of

7 all losses are payable?

8 **A.** I do now. I don't necessarily think it was

9 thought that way previously.

10 **Q.** If we --

11 **A.** I think that was -- you know, one paragraph

12 covered all losses because they were committed,

13 as such, through a branch discrepancy by the

14 branch themselves or a transaction correction

15 being accepted and settled centrally, creating

16 the debt.

17 **Q.** I think you may have seen me take Mr Inwood to

18 the next document, it's POL00113670. This is

19 a document that you'll be familiar with. It's

20 the "Operators' in Service Debt" policy.

21 **A.** Yeah.

22 **Q.** Your name is on the front there as a key

23 stakeholder, approved by Mr Inwood. I think

24 you've said that you actually worked on this

25 policy to some extent?

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1 A. Yeah.

2 Q. If we look at page 4, did you see me take
3 Mr Inwood to this particular document?

4 A. Yes.

5 Q. So it's paragraph 4 and it describes there:
6 "From a purely contractual perspective the
7 Operator of a Post Office branch is responsible
8 for ..."

9 Then the first one:
10 "Making good any loss of Post Office cash
11 and stock without delay."

12 Can you see there how that error and that
13 approach seems to be included in this particular
14 policy?

15 A. Yeah.

16 Q. Can we please look now at NFSP00000043, please.
17 This, I believe, is a draft policy in 2004. If
18 we could go over the page to page 2. We see
19 there "Reviewed" and your name is in the
20 "Reviewed" section. It's called "Debt
21 recovery -- Horizon related errors", and if we
22 look at the "Objective" on page 3 please, we see
23 there it says:
24 "The objective of our debt recovery process
25 is to achieve a 100% success rate in proven

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1 is to achieve a 100 per cent success rate; is
2 that something that you subscribed to during
3 your time?

4 A. No. I never had that as an objective, no.

5 Q. Can we look at POL00088867, please. This is the
6 "Liability for Losses Policy", it's a 2003
7 version. It's a document that I've taken some
8 witnesses to previously. It's page 8 that I'd
9 like to look at, which refers to "Horizon
10 Issues". It says there:
11 "If an agent feels that an error has
12 occurred via the Horizon system, it is essential
13 that this be reported to the Horizon System
14 Helpdesk. The Horizon System Helpdesk will only
15 consider the incident for further investigation
16 if the branch has evidence of a system fault.
17 If no evidence is available, the case will not
18 be investigated and the agent will be held
19 responsible for making good the loss."
20 So it's only going to be investigated if the
21 subpostmaster can produce evidence of a system
22 fault. Am I right in saying, then, that we have
23 the Horizon System Helpdesk there that won't
24 investigate unless the branch can evidence
25 a system fault. I think, in respect of your

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1 charge errors brought to account and made good.
2 The only exceptions will be where there has been
3 a dispute that on investigation has been upheld
4 or, as referenced in the Liability for losses
5 policy, agreement has been given by the retail
6 line representative to write off the loss to
7 their profit and loss account."

8 So where we're past the Dunning Process, the
9 approach is to try to achieve a 100 per cent
10 success rate. Is that something that you would
11 agree with, something that you recall?

12 A. Well, this was in 2004 that this document was
13 written.

14 Q. Yes.

15 A. So that's where I would struggle because I don't
16 know the processes for debt recovery back in
17 2004. I appreciate I'm on the circular of this
18 but it wasn't within my remit.

19 Q. Is that an approach that is consistent with the
20 approach that occurred throughout your time when
21 it was within your remit, that the approach was
22 in reality for a 100 per cent success rate?

23 A. No, because we couldn't receive -- we couldn't
24 achieve 100 per cent success rate for all debt.

25 Q. But the objective of the debt recovery process

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1 team and their processes, they didn't see it as
2 part of their job to investigate an alleged
3 software fault either?

4 A. Well, I don't think they were told about it, no,
5 because they were sending transaction
6 corrections out. This is 2003, so it's prior to
7 the POLSAP system.

8 Q. Were you aware, whilst you were the head of the
9 team, that the Helpdesk was only considering
10 an incident where the subpostmaster themselves
11 had evidence of a system fault?

12 A. No, prior to the Inquiry sending me the
13 paperwork, I've never seen this document from
14 2003.

15 Q. Were you aware of any particular team, then,
16 that was investigating system faults that were
17 raised by subpostmasters but who didn't have
18 evidence of such a fault?

19 A. Not necessarily, no. I think it should have
20 gone in to Service Delivery area, if there was
21 an issue.

22 Q. Should have gone into who and where?

23 A. So there was an IT Helpdesk within, I think,
24 Service Delivery that should have raised any
25 issues and, if there were financial impact, then

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1 should have been engaging with either Rod Ismay,
2 in the first level, or whichever Senior Manager
3 were managing the area where the system was
4 deemed at fault.

5 **Q.** As part of your debt recovery actions, nowhere
6 in your experience did you receive the product
7 of an investigation that had evidenced a system
8 fault that meant that you had to stop the debt
9 recovery action?

10 **A.** Other than the one that's -- I am aware of, the
11 receipts and payments misbalance, it didn't
12 create a debt but it did show as an overall loss
13 in branch, then, other than that one, no. And
14 I think that's probably one of the first times
15 we were engaged in "There's an issue here".

16 **Q.** Thank you. If that could come down, could we
17 bring on to screen your witness statement,
18 WITN06120100, it's page 21, paragraph 46. It's
19 here in your statement that you talk about the
20 system issues raised by branches to the NBSC?

21 **A.** Yeah.

22 **Q.** I think you explain it in this way. You say at
23 the bottom:

24 "FSC worked with the NBSC if multiple
25 branches raised the same queries. Some of those

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1 Horizon system; is that correct?

2 **A.** Transaction acknowledgements, yeah.

3 **Q.** It's only at paragraph 49, so if we go down the
4 page, where you talk about the receipts and
5 payments issue.

6 **A.** Yeah.

7 **Q.** You say:

8 "There were only a few occasions that I can
9 remember that I came across branch trading
10 problems due to what may now be referred to as
11 a Horizon bug (although I do not remember it
12 being called a Horizon bug at the time).
13 I believe that these were for Receipts and
14 payments mismatch issues. I am however afraid
15 that I cannot recall the details of these as the
16 issues were managed by Rod Ismay ... and Andrew
17 Winn ... I was not aware of widespread issues or
18 names for Horizon bugs at the time. The IT
19 Service Management helpdesk would need to be
20 contacted to give details of these issues, their
21 specific cause and resolution that was supported
22 by the FSC."

23 Was this recorded in some way by your team
24 at the time? First of all, can we start by
25 saying when was this time? It's quite

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1 ..."

2 Just pausing there, did you have a system in
3 place to record the fact that multiple branches
4 were raising the same queries?

5 **A.** NBSC would come in to FSC, yes.

6 **Q.** But it wasn't something that FSC itself kept any
7 record of or?

8 **A.** No.

9 **Q.** "Some of these were referred to as system
10 issues, and these would be escalated to the
11 [Post Office] IT service desk and onto the IT
12 suppliers [and you've said] (ATOS/Accenture) for
13 investigation."

14 You've given examples there. First:

15 "Non-arrival of TAs in branch for
16 Lottery/pay station."

17 Then over the page --

18 **A.** I think my point on this one was they were
19 classified as system errors where they weren't
20 Horizon system errors. It was around the data
21 going out to branches that was an issue.

22 **Q.** So, as far as you were concerned with system
23 errors, in fact they are to do with the
24 transaction authorisations and transaction
25 corrections and not to do with the broader

82

1 an important issue for this Inquiry to know when
2 it was that you became aware of the receipts and
3 payments mismatch issues.

4 **A.** I can't put an exact time on it. I want to say
5 2013/14 but I don't know. If this was reported
6 into us from the IT Service Helpdesk, then Rod,
7 I believe, took the lead on it with Andy to
8 understand what the issues were and what should
9 be done about it. And I think the conclusion to
10 this issue -- I don't know how it was resolved
11 with the system, what went wrong or what they
12 did to make it right.

13 I do remember, though, that I think, if it
14 caused a loss in branch, this mismatch, then we
15 issued the branch with a credit TC, so they
16 didn't stand the loss and, if it created
17 a surplus, I believe in the letter that Rod and
18 Andy sent out, it said that we would not be
19 seeking to recover the surplus.

20 But I can't honestly remember whether it was
21 around 20 offices or how big it was.

22 **Q.** How would that information be shared amongst
23 those who were dealing with transaction
24 corrections?

25 **A.** This wasn't a transaction correction issue. It

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1 wasn't an open item but it was flagged up as
 2 a misbalance of the account.
 3 **Q.** But you've said that they would issue, for
 4 example, credit transaction corrections as
 5 a result of this?
 6 **A.** Give the branch cash back, yes, and --
 7 **Q.** Via a transaction correction?
 8 **A.** Yeah. So they issued them the credit that,
 9 potentially, this misbalance caused.
 10 **Q.** Absolutely.
 11 **A.** So if there was a misbalance of £1,000,
 12 I believe that a cash transaction correction was
 13 issued to them to accept, to negate the loss
 14 that they -- had occurred on their account.
 15 **Q.** We began today talking about the various people
 16 at administrative officer grade who were dealing
 17 with transaction corrections. This does seem to
 18 have resulted in a transaction correction in
 19 certain cases. Was there a process by which
 20 information about the receipts and payments
 21 mismatch issues was cascaded down to those
 22 administrative officers who were dealing day to
 23 day with transaction correction issues?
 24 **A.** I don't believe so, no, because they wouldn't
 25 hit the GLs that the individuals were working

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1 necessarily mean Y, in terms of the numbers that
 2 were being shown in the accounts. I think we
 3 spoke about a Camelot issue earlier, for
 4 example. To use that issue, that
 5 a subpostmaster's Horizon figure and the Camelot
 6 figures, if they weren't the same, what would
 7 happen in those situations? Was this something
 8 that those dealing with transaction corrections
 9 should have had been aware of?
 10 **A.** In the early days, if there was a Camelot
 11 transaction correction sent out, it was "Horizon
 12 says this -- you've input Horizon as this, and
 13 Camelot data says this".
 14 **Q.** Yes.
 15 **A.** And with the Camelot transactions, I believe it
 16 was done over a full month. So it could -- the
 17 branch could be up one day, down the next,
 18 et cetera, and it was netted out over probably
 19 a 30-day period until, for the online gain, it
 20 went to transaction acknowledgements.
 21 **Q.** So the position that was being considered was,
 22 "Does X equal Y?" but there was no factoring
 23 into that the possibility that a bug, error or
 24 defect, a bit like the receipts and payments
 25 mismatch issue, might have featured in there

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1 on. They were separate product GL accounts,
 2 general ledger accounts.
 3 **Q.** Why do you say that? How can you say that with
 4 any confidence?
 5 **A.** Well, I suppose I can't but, to my knowledge, it
 6 didn't affect the product lines. I don't know
 7 what the bug created. I know the transactions
 8 didn't match the cash, so the receipts in and
 9 the payments -- receipts out didn't match with
 10 the cash in branch.
 11 **Q.** Do you think that the fact that the transactions
 12 didn't match the cash -- and I think you said
 13 that 95 per cent, or something, of your
 14 transaction corrections related to cash --
 15 **A.** Cash (*audio disruption*).
 16 **Q.** Yes. Was it not information that was important
 17 for those dealing with the transaction
 18 corrections to be aware of?
 19 **A.** I don't know. I didn't believe so at the time,
 20 no.
 21 **Q.** Knowing what you know now, do you believe so?
 22 **A.** Not necessarily within the individual product
 23 teams, no.
 24 **Q.** This is the, I think, the only issue that you
 25 say you were aware of that meant that X didn't

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1 somewhere?
 2 **A.** I suppose it could have done, yeah, but it's the
 3 postmaster that's inputting the Lottery figure
 4 into Horizon.
 5 **Q.** Well, again, how can you be sure that the figure
 6 that you are seeing is the figure, in fact, that
 7 the postmaster was inputting?
 8 **A.** If there was a difference and we'd issued
 9 a transaction correction, he would be able to
 10 challenge it but it would be down to the slip
 11 from the Lottery terminal as well.
 12 **Q.** You're looking at two pieces of paper and seeing
 13 if they match.
 14 **A.** Yes.
 15 **Q.** But, in fact, if one of the pieces of paper
 16 shows an incorrect figure because of a bug,
 17 error or defect, you simply wouldn't be aware of
 18 that, would you?
 19 **A.** Other than there's a difference from what the
 20 client's saying that had been transacted on the
 21 Lottery terminal.
 22 **Q.** You generally took the view that that was
 23 probably something like a miskey?
 24 **A.** Yes. I think it was more around the Lottery
 25 slip on the terminal, on the retail side of the

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1 business, being taken at the wrong time, and it
 2 being inputted into Horizon before the close of
 3 business on the Camelot terminal.

4 **Q.** If you stand back now, though, and really think
 5 about it and think about the fact that you knew
 6 about a bug that could cause a mismatch between
 7 receipts and payments, looking back at the work
 8 that those people who were dealing with
 9 transaction corrections were dealing with, do
 10 you think it would have been useful for them to
 11 have known that the Horizon system was capable
 12 of causing a mismatch of some sort rather than
 13 it being down to user error?

14 **A.** It may have been but I think these were, as I've
 15 just said, probably 20 branches with a receipts
 16 and payments mismatch versus 125,000 transaction
 17 corrections going out a year.

18 **Q.** I think I said that you couldn't be sure about
 19 those figures and I think you accepted that you
 20 couldn't be sure about those figures of the
 21 numbers of branches affected by receipts and
 22 payments mismatches?

23 **A.** Well, I just -- I said it earlier, that I think
 24 it was maybe around the 20 mark, this incident
 25 that --

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1 a "Major Incident Management Process" document
 2 and it sets out different levels of management
 3 within the Post Office. If we look at page 7,
 4 it sets out "Level 2 -- [Post Office Limited]
 5 Business Protection Team". It's at the bottom
 6 of page 7:

7 "This team consists of empowered business
 8 representatives from across [Post Office]
 9 Limited. These business area 'experts' are
 10 available at all times and will be used to
 11 support, inform and influence the management of
 12 a medium/high severity incident."

13 Am I right in saying that you were one of
 14 the "empowered business representatives"?

15 **A.** Yes, I was.

16 **Q.** If we look at page 22, please, we see there the
 17 members of this team and, if we scroll down,
 18 your name appears about three quarters of the
 19 way down.

20 **A.** Yeah, I think Rod was the lead on it so he was
 21 highlighted in bold and I was the sort of deputy
 22 if Rod wasn't there or we both were on the call.

23 **Q.** Was this the kind of forum where those kind of
 24 issues could be discussed and shared?

25 **A.** Yes. If there was a major incident, major power

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1 **Q.** Did you carry out an investigation into the
 2 Horizon system to identify if was only 20
 3 branches?

4 **A.** No. That information went to Rod and Andy,
 5 I believe, on a spreadsheet of these are the
 6 offices that it involves.

7 **Q.** Does it strike you that a system that is capable
 8 of a receipts and payments mismatch issue might
 9 also be capable of another issue affecting
 10 figures in a different way?

11 **A.** I suppose it could have been, yeah, but I wasn't
 12 aware of it.

13 **Q.** Do you think that the fact that the system was
 14 capable of such an issue was something that
 15 should in fact have been cascaded down to those
 16 who were dealing with transaction corrections?

17 **A.** Maybe it should have been, I don't know.

18 **Q.** I want to address, perhaps, cascading upwards
 19 now. Before I do, can you tell us why Rod Ismay
 20 and Andrew Winn? Why were they managing the
 21 receipts and payments issue, in particular?

22 **A.** I don't know. I just know that Andy was
 23 involved with Rod when this was raised as
 24 an issue.

25 **Q.** Can we look at POL00001538, please. This is

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1 outage or something, a call would be put out to
 2 all the people on the list, I believe, at that
 3 time, so -- saying there was a Business
 4 Protection Team call at 11.00. So everybody
 5 dialled in, within this remit, to determine what
 6 the impact of the issue was. And I'm not
 7 necessarily saying it's bugs and defects but it
 8 was any major incident or that was classified as
 9 a major incident.

10 **Q.** We have Rod Ismay listed above you there. You
 11 say you're not saying it was bugs, errors and
 12 defects necessarily. Was it ever bugs, errors
 13 and defects in this group? Do you recall any
 14 discussions of that nature?

15 **A.** No.

16 **Q.** This is a 2009 document. Can you assist us with
 17 how long you were on this team and how long Rod
 18 Ismay was on this team?

19 **A.** I don't know. I don't know whether it was --

20 **Q.** Would this likely have been during your time in
 21 a managerial role you sat in this team?

22 **A.** Yes, it would. Even to me leaving, you know, at
 23 the point of leaving, there could still be,
 24 like, a business protection type meeting called
 25 if there was an issue. So if NBSC were raising

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1 an issue, "There's a problem here", there could
 2 be a call put out for people to go on the call
 3 to understand the impact of any issues that were
 4 being raised.

5 **Q.** You don't recall, for example, NBSC ever raising
 6 the issue of software issues with Horizon
 7 amongst this group?

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

9 **Q.** I'd like to now move on to knowledge of bugs,
 10 errors and defects in the system. Can we look
 11 at POL00006650, that's the document that we've
 12 looked at quite a few times. It's the Womble
 13 Bond Dickinson interview. It's page 38 that I'd
 14 like to look at.

15 So the bottom of page 38, you're asked:
 16 "And really interesting, erm as I am
 17 somebody who has done a lot of Post Office work
 18 over the years as well erm it's really
 19 interesting to meet people and hear what
 20 actually happens erm so it's been really useful.

21 "AB -- I think in any case I'll sort of say
 22 that we [something] were Lee Castleton and Lee
 23 Castleton's evidence is sat in a box in office
 24 and it is this big.

25 "VB -- Really? My boss who I work with in
 93

1 **Q.** Were you aware of why it was seen as a test
 2 case?

3 **A.** Other than proving that Horizon -- to prove that
 4 Horizon worked, was my understanding.

5 **Q.** What was your understanding of why there was
 6 a need to prove that Horizon worked?

7 **A.** Well, I don't think -- it was the challenges
 8 that were probably coming forward at that time,
 9 but I had no real -- it had no real impact on
 10 the areas that I was working on then. It wasn't
 11 until 2007 that I went into Debt Recovery.

12 **Q.** So from 2007 and going into Debt Recovery, you,
 13 very soon into that role, were aware that there
 14 were challenges coming forward relating to the
 15 Horizon system?

16 **A.** This one I was, but I wasn't aware of mass
 17 numbers.

18 **Q.** But you were aware of a particular important
 19 case, the case of Lee Castleton, that challenged
 20 the integrity of Horizon?

21 **A.** Other than -- yeah, because it was a big box
 22 taking a lot of cupboard space up that I was
 23 told "Don't ever destroy it".

24 **Q.** In 2009, so two years later, there was
 25 an article in *Computer Weekly* about the Horizon
 95

1 Bristol, Stephen Dilley -- he did that case with
 2 Lee erm so I remember that being an interesting
 3 case at the time and that was a really ...

4 "AB -- Was it?

5 "VB -- ... important case of a bit of
 6 a Judgment that erm to do with signing off the
 7 accounts and the meaning of what that was so you
 8 know that was erm so was that the only one that
 9 went to trial.

10 "AB -- That's the one that was seen as the
 11 test case of all test cases that we got here."

12 Now, Lee Castleton's case, that was in court
 13 in late 2006, judgment in early 2007, that was
 14 when you were in the position of Senior Debt
 15 Recovery Manager. Would you have known about
 16 the case at the time?

17 **A.** I wasn't -- until 2007 -- I went into the role
 18 in late 2007.

19 **Q.** Yes, so the same year the *Lee Castleton*
 20 judgment.

21 **A.** Yeah, I think when I took the role over, there
 22 was a cupboard within the office that had a very
 23 large box in it and I was told that was the *Lee*
 24 *Castleton* case, don't destroy it, it was seen as
 25 a test case.

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1 system. Was that something that you were aware
 2 of or that was brought to your attention at the
 3 time?

4 **A.** I believe Rod Ismay have brought it to our
 5 attention that there was an article.

6 **Q.** An article that challenged the integrity of
 7 Horizon or that raised concerns about the
 8 integrity of Horizon?

9 **A.** Yes.

10 **Q.** Moving on to the *Seema Misra* case, can we look
 11 at POL00093686. We're now at 21 October 2010,
 12 so the next year. If we could look at page 5,
 13 please. Could we zoom in to that bottom email,
 14 please. There's an email to you, it's to Mandy
 15 Talbot as well and number of other people.
 16 You're listed there alongside Rod Ismay, Susan
 17 Crichton, et cetera, and it's about the *Seema*
 18 *Misra* case from Jarnail Singh. He says:
 19 "After a lengthy trial at Guildford Crown
 20 Court the above named was found Guilty of theft.
 21 This case turned from a relatively
 22 straightforward general deficiency case to
 23 an unprecedented attack on the Horizon system.
 24 We were beset with unparalleled degree of
 25 disclosure requests by the Defence. Through
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1 hard work of everyone, Counsel Warwick Tatford,
2 Investigation Officer Jon Longman and through
3 the considerable expertise of Gareth Jenkins of
4 Fujitsu we were able to destroy to the criminal
5 standard of proof (beyond all reasonable doubt)
6 every single suggestion made by the Defence.

7 "It is to be hoped that the case will set
8 a marker to dissuade other Defendants from
9 jumping on the Horizon bashing bandwagon."

10 Why were you a recipient of this particular
11 email?

12 **A.** Because I believed that we'd got debt
13 outstanding for Seema Misra.

14 **Q.** Do you recall receiving it?

15 **A.** I don't know whether I can or not. I can
16 remember the *Seema Misra* trial, which -- I know
17 it was instigated by Security, I believe, as
18 a criminal prosecution.

19 **Q.** If we look at the comments from Jarnail Singh
20 there:

21 "It is to be hoped the case will set
22 a marker to dissuade other Defendants from
23 jumping on the Horizon bashing bandwagon."

24 Would that comment have struck you as
25 unusual, business as usual, totally normal,

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1 at the subject, it's Katherine McAlerney, it's
2 a case that we may be hearing more about in due
3 course. We have there 22 September 2011, so the
4 next year. Who was Jacqueline Witham?

5 **A.** I believe she was the team leader for Former
6 Agents at that time.

7 **Q.** Thank you. Could we please -- I'm going to
8 actually start -- I'll read quite a bit of that
9 email out, actually. It says:

10 "Dear Joe

11 We currently have some cases on hold where
12 former agents are claiming that Horizon has
13 caused their discrepancies and so this case
14 gives us some cause for concerns.

15 "The ideal solution for us would be to
16 secure a confidential settlement of £4,000 to
17 £6,000 on commercial grounds which would avoid
18 any risk of criticism of Horizon by the Judge.

19 "To progress to Court I think we would need
20 to give serious consideration to acquiring the
21 Fujitsu data to validate the integrity of our
22 Horizon system."

23 So I'm going to take each of those one by
24 one. "We're currently having some cases on
25 hold", so you were aware that there were cases

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1 something else?

2 **A.** I think it's probably very unprofessional for it
3 to be written like that.

4 **Q.** Because, of course, you were already aware of
5 the *Lee Castleton* being a significant case in
6 respect of protecting the integrity of Horizon.

7 We now have the *Seema Misra* case. As at this
8 time, so October 2010, do you think it's fair to
9 say that you were aware of reputational concerns
10 at the Post Office about the Horizon system?

11 **A.** Yes, that they were being raised but, equally,
12 that the business was defending that Horizon was
13 robust. So I think that's the message that was
14 coming down -- down the line, that Horizon --
15 the integrity of Horizon, it was a robust
16 system.

17 **Q.** But you were also being made aware that there
18 were quite significant challenges to the Horizon
19 system?

20 **A.** I think -- well, there's two there, yes.

21 **Q.** Can we look at POL00073014. I'll move away from
22 Seema Misra for a minute but I will return to
23 that case in a second.

24 **A.** Yeah.

25 **Q.** Thank you very much. We have there, if we look

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1 on hold where Horizon was being raised as the
2 source of discrepancies, and that's September
3 2011.

4 **A.** I think that was the JFSA cases.

5 **Q.** "The ideal solution is a settlement so that we
6 avoid any criticism of Horizon"; was that
7 an approach you were familiar with from within
8 the Post Office?

9 **A.** Yeah, I think it was suggested by one of the
10 solicitors as well but I think around that, I've
11 read the other papers on this, there was
12 a cheque for £4,100 and something so that's why
13 they suggested 4,000 was there, that there was
14 a cheque within the deficit of 10,000 that had
15 not been received at the processing centre, so
16 we'd not had the funds.

17 So I think that's probably where the
18 rationale came from for 4,000 to 6,000.

19 **Q.** If the Post Office was concerned about criticism
20 of Horizon by the judge, why would they pursue
21 the matter at all if there was cause to
22 criticise Horizon?

23 **A.** Potentially, we shouldn't that have, then, you
24 know, in that scenario.

25 **Q.** In the final sentence there about "giving

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1 serious consideration to acquiring Fujitsu data
 2 to validate the integrity", do you recall there
 3 being issues with obtaining data from Fujitsu or
 4 cost implications or a reluctance to obtain that
 5 data?
 6 **A.** Yeah, so I think on this debt of £10,000,
 7 Fujitsu were quoting 6,000 something to gain the
 8 data, which again, commercially, is madness.
 9 **Q.** Might it be worthwhile to acquire the data
 10 before bringing an action against
 11 a subpostmaster?
 12 **A.** Then yeah, I suppose that could have been one
 13 way round but the cost of doing that, there were
 14 no budget held for requesting data from Fujitsu
 15 by the FSC teams and the quotes that were being
 16 said were astronomical.
 17 **Q.** Do you think, in all those circumstances, it was
 18 appropriate to pursue settlement in the Post
 19 Office's favour when you knew, for example, that
 20 there could be arguments about Horizon, that
 21 Post Office might have difficulty in proving
 22 parts of its case?
 23 **A.** I think possibly on this case -- and I can't be
 24 100 per cent certain without seeing case
 25 papers -- that this subpostmistress hasn't

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1 communication we had.
 2 **Q.** I'm going to return to the *Seema Misra* case.
 3 Can we look at POL00057681?
 4 **SIR WYN WILLIAMS:** Sorry Mr Blake, before you do,
 5 just the first sentence, Ms Bolsover are you the
 6 "Alison" referred to there.
 7 **A.** Yes, I am.
 8 **SIR WYN WILLIAMS:** So before this email was written,
 9 you'd actually reviewed what was to happen with
 10 Jacqueline Witham; is that correct?
 11 **A.** Err --
 12 **SIR WYN WILLIAMS:** That's what the email says.
 13 **A.** When Joe Napier wrote back to say it was being
 14 challenged, the debt was being challenged,
 15 I believe Jackie sat down with me and reviewed
 16 what was in the case at the time.
 17 **SIR WYN WILLIAMS:** This email, no doubt, was written
 18 as a result of the work that you and she did on
 19 the available information?
 20 **A.** Yes.
 21 **SIR WYN WILLIAMS:** Fine. Thank you.
 22 **MR BLAKE:** Returning to the *Seema Misra* case, can we
 23 look at POL00057681. We are going broadly
 24 chronologically. If we look at the second page
 25 there, there's an email from yourself to Jenny

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1 raised Horizon Issues until Joe Napier went or
 2 sent his paperwork or his letters over, the
 3 solicitor in Northern Ireland sent the paperwork
 4 to her. So I don't know whether she had
 5 responded and said it was a Horizon case prior
 6 to it being sending it to Legal.
 7 **Q.** Was the burden always on the subpostmaster
 8 themselves to try to figure out what it was that
 9 was going wrong with their system?
 10 **A.** Potentially, yes, but I think if you get
 11 a letter saying you owe £10,000 worth of debt
 12 broken down in this way and, initially, you've
 13 not responded to us to say, "I believe it's
 14 a system error" or "Horizon caused this", then
 15 the normal BAU process would take place.
 16 **Q.** You were top of the tree in terms of management
 17 of this team and you weren't even very familiar
 18 with system errors, were you? Do you think it
 19 was appropriate to put that burden on
 20 a subpostmistress?
 21 **A.** Potentially not, no. But, equally, it's what
 22 level of reporting it or telling us there was
 23 an issue had taken place and I don't know that.
 24 You know, you'd have to look at the paper case
 25 on this to understand what level of

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1 Smith and Zoe Topham. Can you assist us with
 2 who they were?
 3 **A.** Zoe was the postal officer on Former Agents Debt
 4 and I think Jenny was the team leader.
 5 **Q.** Thank you. That is an article you're forwarding
 6 and you say "The *Misra*", so it's about the *Seema*
 7 *Misra* case?
 8 **A.** Yeah.
 9 **Q.** If we scroll up, we can see an email from
 10 yourself to Dave Posnett and others, including
 11 Rod Ismay, as well, and I'm just going to read
 12 that email. You say:
 13 "Dave
 14 "The *Misra* case was closed on 1 March 2011
 15 but she has been in court in April 2012 re
 16 confiscations hearing see new article on link
 17 below.
 18 "Can we have an update on this and a view on
 19 if any further work re civil recovery would be
 20 viable as it looks like there are no assets left
 21 here to go after.
 22 "This is one of the cases on our Horizon
 23 issues spreadsheet that we may need to close."
 24 Can you assist us with what the "Horizon
 25 issues spreadsheet" was, please?

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- 1 A. This, I don't know whether it was Justice for
2 Subpostmasters or not. I'm struggling on the
3 timeline of, you know, what was raised by what
4 areas, whether it's an MP's case or a Justice
5 for Subpostmasters case.
- 6 Q. So at some point in 2012 there was either
7 a complaint raised by Members of Parliament or
8 complaints raised by the Justice for
9 Subpostmasters Alliance that caused the Post
10 Office to build up a "Horizon issues
11 spreadsheet"; is that correct?
- 12 A. Yeah, yes.
- 13 Q. Can you assist us with what was on the Horizon
14 issues spreadsheet or what you considered to be
15 a Horizon issue?
- 16 A. Not -- only that it had been raised as a Horizon
17 issue, so it was just a -- the branch name, the
18 FAD code, the date and that it had been raised
19 as an Horizon issue, not the details of the
20 issue.
- 21 Q. As at 2012, did it have quite a lot of names,
22 only a few?
- 23 A. I don't know.
- 24 Q. Who was responsible for managing the Horizon
25 issues spreadsheet?

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- 1 changes in the future."
- 2 Are you able to assist us with how the
3 relationship was between yourselves and the
4 criminal team and how it was that you became
5 involved in emails about a criminal case?
- 6 A. Because there was a debt outstanding. So there
7 would have been a debt on the customer line for
8 West Byfleet and we wanted to know what was the
9 next part of the process. Were the Security
10 team recovering the debt or not? And if they
11 saw no advantages in -- so if they'd not gone
12 through with the case, do they see an advantage
13 in us going for civil recovery or trying to make
14 civil recovery?
- 15 Q. Say in your statement that the decision to take
16 proceedings to recover debt via the criminal
17 courts was a decision of the Security and
18 Investigations Team; is that correct?
- 19 A. That's correct, yeah. So we wouldn't pursue
20 civil recovery if there was a criminal
21 investigation or an investigation taking place.
22 The debt would be blocked and noted that it was
23 with Security.
- 24 Q. The decision making, though, you have said it
25 was the Security and Investigations Team, am

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- 1 A. I think it was the team in Chesterfield that put
2 in the Horizon sheet, if -- or the solicitors
3 advised us that these were the Horizon Issues
4 cases. I think it may have been the latter,
5 that we'd been informed that these were
6 postmasters that were claiming Horizon. So we
7 kept a list of all cases.
- 8 Q. Thank you. If we can scroll up, we'll see the
9 emails that followed. From Zoe Topham, Former
10 Agents Debt Team:
- 11 "I refer to the latest developments below,
12 please could you confirm if you attended the
13 confiscation hearing? Also I know Ms Misra's
14 house had been repossessed and back in January
15 was being sold, do we know how much this went
16 for and where the money went? Obviously if the
17 house was repossessed then Ms Misra would not
18 have received any payment from the sale."
- 19 The response above that is:
- 20 "My understanding from Jarnail Singh (who
21 deals with criminal cases for [the Post Office])
22 is that the confiscation order remains in place,
23 albeit for a nominal sum of £1 on the basis that
24 Misra has no assets. This can, however, be
25 varied in the event that her financial position

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- 1 I right to say that the ultimate decision then,
2 in your view, was not with a Legal team of some
3 sort?
- 4 A. I don't know the processes around the Security
5 team's decision making.
- 6 Q. Now, we've spoken about the receipts and
7 payments mismatch issue. Do these emails about
8 the *Seema Misra* case, do they assist you in
9 giving a timeline as to when you were aware of
10 the receipts and payments mismatch issue?
- 11 A. No, I didn't know that -- if *Seema Misra* was
12 part of that, I don't know about that.
- 13 Q. But do you think it was around about 2012 that
14 you found out about that issue, very roughly?
- 15 A. I didn't work on it so I don't know. I'm only
16 doing it from memory. This is what I remember
17 at the time but -- when I did my statement but
18 I can't remember actual dates around it. I can
19 remember all the letters being on a SharePoint
20 site in Chesterfield, and I think they were
21 still there when I left, for the receipts and
22 payments mismatch, which would probably, you
23 know, guide you around what time this happened.
- 24 Q. Thank you. Can we --
- 25 A. (Unclear)

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1 Q. -- please look at POL00073165, please. I'm
 2 going back in time, slightly, just back to the
 3 end of 2011, December 2011. We have an email
 4 from you in the bottom half of the page, to
 5 Emily Springford and Sabrina, can you assist us
 6 with who Emily and Sabrina were?
 7 A. They were Legal, within the internal Legal team,
 8 I think.
 9 Q. You say:
 10 "Emily/Sabrina
 11 "Re my action from the meeting last week
 12 please see the attached file for all cases
 13 I have and the recommendations made to progress.
 14 "Can you confirm your availability for
 15 a [telephone conference]", et cetera.
 16 Then you have an update on the JFSA meeting
 17 and you say:
 18 "Of the 533 live cases there are 23 known
 19 cases that are Horizon challenges totalling
 20 £751,000."
 21 Are you able to assist us, we saw reference
 22 earlier to a Horizon spreadsheet. Is that the
 23 same issue or a different issue to this
 24 particular correspondence?
 25 A. I think it's probably the same, the same as what
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1 Q. Is this a document that you recall seeing?
 2 A. In the bundle. I can't remember prior to this
 3 but, from the bundle, I can remember reading it.
 4 Q. It seems that in December 2011, there was
 5 a weighing up as to whether to pursue those
 6 who'd raised Horizon Issues for debt or not; is
 7 that right? Is that something you recall?
 8 A. Yes.
 9 Q. She's there weighing the benefits and risks.
 10 Can we look at the risks, please.
 11 A. I think this was done on the request of Susan
 12 Crichton.
 13 Q. Thank you. The risks there:
 14 "If [the Post Office] is pursuing claims in
 15 several County Courts, there is a risk that the
 16 Post Office could lose some, as the quality of
 17 judges invest variable."
 18 Is that something that you heard said at
 19 all?
 20 A. Not particularly, no.
 21 Q. No:
 22 "[Post Office] could be accused of acting
 23 prematurely (and potentially penalised on costs)
 24 if it were to start Court proceedings against
 25 [Scott] Darlington and Walters whilst the
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1 was quoted then, yes.
 2 Q. So in December 2011, it's likely that there were
 3 23 cases that were considered to be Horizon
 4 challenges of some sort?
 5 A. Yeah.
 6 Q. Then there's suggestions about which ones are
 7 progressed. If we scroll down, I won't take you
 8 to the individual cases but there's reference to
 9 which ones will be proceeded with or how they'll
 10 be proceeded with. Was there a pause at any
 11 stage in respect of recovering from Horizon
 12 related cases?
 13 A. Was there a what, sorry?
 14 Q. A pause on the recovery action? The fact that
 15 something is on a spreadsheet, does that mean
 16 that you paused action until there was further
 17 investigation on these particular cases?
 18 A. These were all paused, yeah, and I think the
 19 request was made how would we prioritise these
 20 cases if we were to resume -- if we were to
 21 resume debt recovery.
 22 Q. Can we look at POL00085749. There's a document
 23 produced by Emily Springford, Royal Mail Legal
 24 Services. Do you remember Emily Springford?
 25 A. Yes, I remember Emily's name.
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1 'pre-action' dialogue with Shoosmiths was
 2 ongoing."
 3 You she then says:
 4 "Arguably, bringing more claims increases
 5 the risk of systemic problems coming to light
 6 (such as training for support failures).
 7 However there is little that can be done to
 8 minimise the risk, apart from analysing the
 9 claims carefully at the outset, and bringing
 10 them in batches, with the strongest first, as
 11 suggested."
 12 Now, in December 2011 were you aware of
 13 concerns that systemic problems might come to
 14 light, systemic problems that relate to Horizon,
 15 appreciating that, in brackets there, we have
 16 "training and support failures" as what are
 17 recognised as systemic problems?
 18 A. I don't know what Emily Springford's -- where
 19 she put that, got that from. So, you know,
 20 I can't really comment on what she's written
 21 there.
 22 Q. Were you aware --
 23 A. (*Unclear*) about spreadsheets, so the JFSA, there
 24 are also letters coming in from -- or Shoosmiths
 25 or Shoosmiths-type letters coming in to the
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1 Legal team or to ourselves.

2 **Q.** Yes. Were you aware of concerns at the Post
3 Office about the risk of systemic problems
4 coming to light?

5 **A.** I think, yes, and I think that's why the
6 messages kept coming down that say Horizon was
7 robust.

8 **Q.** So by the end of 2011 and into 2012 you knew
9 about the *Lee Castleton* case that was important
10 in defending Horizon; you knew about the *Seema*
11 *Misra* case that needed to defend the Horizon
12 system; you knew that the Post Office wanted to
13 avoid criticism of Horizon; and it's there being
14 circulated that there were systemic problems
15 about the Horizon system; you also have this
16 spreadsheet of concerns being raised about the
17 Horizon system.

18 **A.** Yeah.

19 **Q.** Did you not at that point think that it was
20 important for your team to be aware of those
21 concerns and criticisms of the Horizon system?

22 **A.** I think they were, from the communication that
23 came down line but it was always rebuffed that
24 Horizon was reliable.

25 **Q.** Was your impression that the company, the Post

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1 Horizon system?

2 **A.** Potentially not, no.

3 **Q.** Did you consider that continued enforcement
4 action against subpostmasters in 2011/2012,
5 during the period of those emails that we've
6 seen, do you think that that was appropriate, in
7 all the circumstances?

8 **A.** In -- I think in respect of was it raised back
9 to us as an issue? So if you're sent a letter
10 and you vehemently don't agree with it, you
11 would get in touch with the issuer. So, you
12 know, if somebody wrote to me to say, "I owe
13 this much money", I'd want to know why I do, and
14 "Here's your statement", so work out, did I owe
15 that money?

16 So I think some of it, whilst I appreciate
17 issues have been raised and numbers have risen,
18 if you, as the recipient of that debt letter,
19 don't come back to the Post Office and say,
20 "Hold on a minute, you know, it's not this, it's
21 caused by this", then we would continue on the
22 process that was set in place.

23 **Q.** Do you think it was fair, given the imbalance in
24 the state of knowledge between the two parties,
25 for the burden to be on the subpostmaster to be

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1 Office was doing enough, in that regard?

2 **A.** Communicating to teams, or?

3 **Q.** Communicating that there were significant issues
4 being raised with the Horizon product?

5 **A.** I don't think -- when you say it's considerable,
6 I don't know what the numbers were. I knew what
7 cases we'd got flagged as potentially raising it
8 as an Horizon issue.

9 **Q.** 23 known cases as at December 2011 --

10 **A.** 23 at alleged Horizon, yeah.

11 **Q.** -- plus concerns about systemic problems, plus
12 two very significant cases that were trying to
13 defend the Horizon system?

14 **A.** But I think at that time there was about 14,000
15 offices, so the ratio was potentially small.
16 Not that that, you know, negates anything else
17 but two cases out of potentially 550 that I had,
18 or even 23, were a low percentage.

19 **Q.** I think that was two lead cases which were used
20 by the Post Office. I think, by this period,
21 you also knew about or likely to have known
22 about the receipts and payments mismatch issue.

23 **A.** Potentially, yeah.

24 **Q.** Do you think at this time the Post Office was
25 doing enough to interrogate the integrity of the

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1 the one who has to bring that forward?

2 **A.** I think if you consider -- there wasn't just
3 Horizon that came into play for branch
4 discrepancies. When you consider we may be
5 issuing £1 million a month in credit TCs to
6 a branch, that should have been offset against
7 a branch discrepancy that they'd got. So if
8 there was a -- you know, a branch -- there must
9 have been hundreds of branch discrepancies that
10 postmasters may have made good and we were
11 crediting them back with the transaction
12 corrections that we sent out.

13 So it's a wider picture, but £1 million
14 a month in credits going back out to branches is
15 a lot of misbalances within branch. It's not
16 necessarily caused by Horizon. As I've said,
17 you know, the cash scenario is a postmaster
18 counting the cash to send to the Cash Centre,
19 and that cash being counted under camera and
20 a shortage or a surplus being found. But
21 £1 million a month is a lot that could
22 potentially be classified as an Horizon issue,
23 that wasn't.

24 **Q.** Before we break for lunch I'll take you to one
25 example that might assist you with the potential

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1 consequence of that attitude. Can we look at
2 POL00090669, please, page 11. We're now in May
3 2012, so after many of those documents that I've
4 just taken you to about concerns with the
5 Horizon system. Page 11, please.

6 There's an article in North West Wales BBC
7 News, "Subpostmistress Margery Williams
8 sentenced for ... post office fraud":

9 "A subpostmistress who stole more than
10 £14,000 to help keep a community shop open has
11 escaped a prison sentence."

12 If we look at the page before, just for your
13 information, that particular case, the
14 conviction was subsequently quashed. The Court
15 of Appeal found that it was an unexplained
16 shortfall case, that there was a basic failure
17 to investigate the issues that she had raised in
18 interview. Nothing to suggest that ARQ data had
19 been obtained and that there was no evidence to
20 corroborate Horizon evidence that was used
21 against her.

22 Can we please look at page 14, sorry. At 14
23 we have an email from Helen Dickinson, April
24 2012:

25 "Please see attached the case closure ...
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1 A. I don't know. He obviously did.

2 MR BLAKE: Thank you, sir --

3 A. I can't defend that, can I? And I can't. It's
4 in writing now.

5 MR BLAKE: Sir, might that be an appropriate moment
6 to take our lunch break?

7 SIR WYN WILLIAMS: It is, but I just want to address
8 Mr Enright or, if Mr Stein or Mr Jacobs are
9 present, them. So could the camera go onto
10 those persons, please?

11 MR BLAKE: Mr Stein and Mr Enright are both present.

12 SIR WYN WILLIAMS: Right. Fine.

13 Well, I understand that Mrs McAlerney and
14 Mr Scott Darlington and members of their family
15 after present and one of the reasons they came
16 to the Inquiry this morning was their belief
17 that Ms Bolsover was giving evidence in person.

18 MR STEIN: Sir, that's right.

19 SIR WYN WILLIAMS: I'm very sorry that that
20 understanding on their part wasn't correct, and
21 that the Inquiry hadn't done more to alert the
22 public at large, but those persons in
23 particular, that this was a remote witness.

24 In the future, I will try to ensure that, if
25 a witness is giving evidence remotely, that that

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1 "A full recovery of [£14,000] has been
2 achieved."

3 There's a big "YAY!" there on the top. If
4 we go back to page 10, which the reference to
5 the BBC News article in May 2012, Matthew
6 Hibbard, who is a Product Accountant, says:

7 "She sounds like a nice lady just doing her
8 best, then the nasty Post Office comes along and
9 finds an error!

10 "I bet this is your fault!"

11 He sent that to you. Why did people at the
12 Post Office, including within your team, feel
13 that they were able to joke about Horizon cases
14 as late as May 2012, given that all of those
15 documents that we've looked at with spreadsheets
16 being put together about problems being raised
17 about the Horizon system.

18 A. I think you'd have to direct that question at on
19 Matt Hibbard on why he sent it through.

20 Q. Was he somebody who you were managing?

21 A. No, he was a Senior Manager within Product and
22 Branch Accounting.

23 Q. Do you think that there was an atmosphere within
24 the Post Office that saw the conviction of
25 Ms Williams as something to joke about?

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1 will be publicised in sufficient time for those
2 who may be particularly interest in that
3 witness, to make a decision about whether they
4 wish to attend the Inquiry in person or look on
5 through Internet channels, if I can call it
6 that. All right?

7 I just wanted to make that clear.

8 MR STEIN: Sir, thank you and thank you for
9 considering the matter.

10 SIR WYN WILLIAMS: All right. Then we'll start
11 again at 2.00.

12 MR BLAKE: Thank you.

13 (1.01 pm)

(The Short Adjournment)

15 (2.00 pm)

16 MR BLAKE: Good afternoon, sir, can you see and hear
17 me?

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

19 MR BLAKE: Thank you very much.

20 Can we bring up on to screen POL00057991,
21 please. We're now into June 2012 and you'll see
22 at the bottom there's an email from yourself to
23 Angela van den Bogerd. It may assist if we
24 actually start on the page after, which is
25 an email that's been forwarded. That is

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1 an email from Chris Darvill, who is in Legal
2 Services, to Angela van den Bogerd, about "MPs
3 visit" and it seems as though Members of
4 Parliament's visit. He says:

5 "Angela
6 "I have compared the list of branches
7 against the known cases being fronted by
8 Shoosmiths. 3 of the 5 cases formally notified
9 to [the Post Office] fall within the
10 constituencies of one of the 37 MPs due to
11 attend the meeting."

12 It gives some names there:

13 "I have set out a summary of the facts
14 below. I have taken some of this information
15 from the letters prepared by Shoosmiths, but
16 have not yet had an opportunity to verify it."

17 The first case there is the case of Scott
18 Darlington and it says, for example:

19 "Letter before action sent by Shoosmiths on
20 16 August 2011. It is alleged by the
21 [subpostmaster] that he was compelled to make
22 the false declarations by virtue of economic
23 duress and that the offences resulted from the
24 unfairness of the system devised for use by the
25 [subpostmasters] and/or as a result of errors

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1 Pearce on the top 5 cases ..."

2 Can you assist us, when you refer to "top 5
3 cases", what did you mean by that?

4 **A.** I think potentially in value of debt, I don't
5 know.

6 **Q.** You were awaiting risk analysis. Can you recall
7 who was carrying out the risk analysis and what
8 kind of a process that was?

9 **A.** I think that was the Emily Springford page that
10 you had up previously.

11 **Q.** So the pros and the cons?

12 **A.** Yeah, Susan Crichton had asked for a risk
13 analysis to be done.

14 **Q.** Can you assist us with why on 7 June 2012 you
15 would be in contact by Angela van den Bogerd
16 discussing these issues?

17 **A.** She would have asked me for some information on
18 the cases, I would imagine.

19 **Q.** What do you recall of her involvement with these
20 kinds of issues?

21 **A.** She was majorly involved in -- you know, in the
22 MP cases, the mediation and with our internal
23 solicitors.

24 **Q.** At this time, what did you understand her views
25 to be on the Horizon system and its integrity or

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1 generated by the Horizon system itself. As
2 a result, the [subpostmaster] claims that [the
3 Post Office] was not entitled to terminate his
4 appointment and consequently [the Post Office]
5 is liable for the wrongful termination of his
6 contract."

7 It says below that:

8 "It is alleged that (a) the training
9 provided was inadequate, (b) the helpline
10 provided by [the Post Office] was unfairly
11 difficult to access due to both its hours of
12 operation and the insufficiency of operators to
13 deal with the level of demand placed on the
14 service, (c) the Horizon system suffers with
15 inherent defects and/or an unfair system of
16 operation and (d) the standard operating
17 procedures used by [the Post Office] make it
18 impossible to properly reconcile errors."

19 If we go over the page, to page 1, and the
20 second of those emails, we have yourself
21 emailing Angela van den Bogerd about the Scott
22 Darlington case, and you say:

23 "This is one of our top 5 cases that I have
24 recommended that we proceed on but I am awaiting
25 a risk analysis and cost estimate from Bond

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1 its robustness?

2 **A.** I believe she conveyed that it was a robust
3 system.

4 **Q.** So where we have those pros and cons that we
5 were looking at before lunch and there were some
6 risks identified, including risk of systemic
7 problems coming to light, such as training or
8 support failures, those were things that both
9 you and she was aware of at this time, because
10 that document was dated 20 December 2011.

11 **A.** Yeah.

12 **Q.** The allegations being raised by Mr Darlington,
13 for example, include allegations about training
14 being inadequate. Do you remember any
15 conversation about Mr Darlington's case, about
16 how some of those factors might actually chime
17 with the risks that have been identified?

18 **A.** No, I can't remember the -- unfortunately,
19 I can't remember of the specifics around that or
20 in seeing the document you had up previously.
21 Did I see that? I don't know.

22 **Q.** If we scroll up, we have it forwarded -- or
23 an email from Angela van den Bogerd to Alwen
24 Lyons, can you remind us who Alwen Lyons was?

25 **A.** Company Secretary, I think.

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1 Q. Do you recall from this period what his views on
2 the integrity of Horizon was?

3 A. It's a her.

4 Q. Her, sorry.

5 A. Both Susan Crichton and Alwen Lyons came to
6 visit Chesterfield to discuss debt recovery and
7 see the operation in FSC. So I don't know what
8 her involvement was within the MP's visit so
9 I can't answer that but she saw the cases that
10 we'd got and we discussed them, just on the
11 basis that we've got a level of debt.

12 Can we look at POL00107907, please, and
13 starting on the second page. It's the bottom of
14 page 1, sorry, top of page 2. In fact,
15 actually, we can start at the bottom of the
16 page.

17 The bottom email there -- sorry, if we could
18 scroll down, from Michelle Stevens, you're
19 copied in:

20 "Dear all

21 "Please see details from a Former Agent who
22 has already pleaded guilty and has been
23 sentenced to 12 months community order but is
24 now claiming Horizon.

25 "I intend to [follow] my debt recovery
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1 anybody told us to block the debt because of X,
2 then that's what we would do.

3 Q. If we scroll down on this page we have an email
4 from yourself to Roderic Williams, Simon Baker,
5 Andrew Winn, Rod Ismay:

6 "I have been reviewing the cases that we
7 have that state Horizon issues/pending the
8 Second Sight review but there appears to be gaps
9 on what we have and what cases have been
10 progressed.

11 "I am assuming we need to keep these cases
12 on hold but could you please advise."

13 Then you receive a response from Roderick
14 above that says:

15 "... I suspect there will be number of
16 subpostmasters (current or former) who have
17 raised Horizon Issues directly with the
18 JFSA/Second Sight and who would not necessarily
19 be known to us.

20 "Simon -- can we please ask Second Sight for
21 a list of everyone who submitted an issue to
22 them under 'Raising Concerns with Horizon'
23 agreement we signed with them and the JFSA? We
24 need to ensure we comply with our obligations
25 under that agreement, specifically that we don't
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1 process and proceed with chasing our debt unless
2 otherwise instructed."

3 That's April 2013. We have an answer there
4 above from Roderic Williams that you're copied
5 into and he says:

6 "We need to consider how this impacts on the
7 investigation into the Horizon system and what
8 we said we would do about pursuing recoveries
9 while that investigation is ongoing."

10 So am I right in saying that in April or by
11 April 2013, there was a pause in certain cases
12 on recoveries?

13 A. Yeah, I think as instructed by either Rodric
14 Williams or other parts of the business, the
15 mediation cases, I think they were pre-this, but
16 if any challenges had come in, then we were
17 asked to put -- if we -- who are holding debt,
18 to put it on hold.

19 Q. Can we look at POL00086707, please. Where it
20 refers to "investigation" in that document we've
21 just seen, is that the Second Sight
22 investigation?

23 A. Yeah, and wherever a claim had been raised, the
24 Shoosmiths, the JFSA, if the debt was flagged as
25 blocked due to Horizon Issues raised, so if
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1 start taking action against an individual who
2 has raised a concern until the investigation has
3 been completed."

4 If we scroll down the page and over to the
5 next, we have there the list of cases that you
6 had. But I think, to summarise this chain, it's
7 that you didn't necessarily have the
8 comprehensive list because it may be that some
9 people complained to Second Sight rather than to
10 the Post Office.

11 A. Yeah, and I think that was our biggest concern:
12 that we may be chasing debt where concerns had
13 been raised but we had not been made aware of it
14 in FSC, so we couldn't block a debt -- or we
15 didn't block a debt being chased if we didn't
16 know there was issues being raised.

17 Q. At this stage, so we have people who are making
18 proactive complaints about the Horizon system
19 that are notified on this spreadsheet or ones
20 that have complained to Second Sight. What
21 happens in a new case? So where a subpostmaster
22 complains they're being pursued for recovery and
23 they say, "I simply don't know why the figures
24 say that they say what they say, I can't explain
25 it"; did you feel any duty on yourselves to
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1 notify them that there were these cases that
 2 were raising issues with Horizon?
 3 **A.** If they told us that they thought I was
 4 an Horizon issue then we flagged it back into
 5 Legal.
 6 **Q.** So where somebody said to you "I have a problem,
 7 I know it's caused by a some issue", that would
 8 be entered on to this spreadsheet?
 9 **A.** If they said it was an Horizon issue, yes.
 10 **Q.** If they couldn't explain what the issue was but
 11 knew that they hadn't been the cause, did you
 12 see any duty on the Post Office to alert them to
 13 this mounting body of complaints about the
 14 Horizon system?
 15 **A.** I didn't at the time, no.
 16 **Q.** Later that year, October 2013, there was
 17 something called the Detica report. Is that
 18 a report that you were aware of at all?
 19 **A.** No, because I believe it was around the work
 20 undertaken by what used to be the Fraud and
 21 Conformance Team and they moved out of my area
 22 into Security in 2012. So I think the report
 23 was commissioned by Sally Smith in the Security
 24 team but I'd not seen it until you sent it to
 25 me.

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1 to chase subpostmasters", then I attended, but
 2 I can't remember -- I can't remember attending
 3 it but I can, you know, vaguely remember the
 4 meeting but I don't know. It's only from the
 5 notes that you've sent me.
 6 **Q.** So, in that case, I'll go through it quite
 7 quickly and I'll only read the first two bullet
 8 points:
 9 "[Chris Aujard] explained that this was
 10 a working meeting and that the Scheme was
 11 designed to resolve the complaints of
 12 [subpostmasters]. [Second Sight] have a role in
 13 reviewing the complaints in the Scheme. The
 14 role of [Second Sight] is well defined and
 15 constrained as their terms of reference. Due to
 16 the wide range of questions raised by [Second
 17 Sight], [Chris] sent his recent letter. The
 18 concern is that the wide-ranging questions asked
 19 by [Second Sight] would put [the Post Office] in
 20 the position of dealing with information in
 21 a non-compliant way and also that they did not
 22 relate to any specific cases. [The Post Office]
 23 expected focused questions relevant to specific
 24 cases from [Second Sight] to be able to assist
 25 with the mediation process and to be able to

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1 **Q.** It's not something that was ever summarised to
 2 you or brought to your attention?
 3 **A.** No.
 4 **Q.** No. Can we please turn to POL00022296. We're
 5 here in January 2015 now, so quite a significant
 6 time has passed. This is a meeting at Bond
 7 Dickinson or with Bond Dickinson and the matter
 8 is "Horizon Challenges General". You are listed
 9 there as one of the attendees, if we could
 10 scroll down, so we have there Second Sight, some
 11 senior members of the Post Office, including
 12 Angela van den Bogerd, for example, and General
 13 Counsel, Chris Aujard. Why were you attending
 14 that meeting, do you remember?
 15 **A.** I don't know -- no, I don't know why I was.
 16 I think probably to brief us on where they were
 17 with Second Sight or what was happening.
 18 **Q.** It's a relatively small list of attendees. Does
 19 that indicate that you were seen as particularly
 20 significant in respect of Horizon issues or are
 21 we to read something else into that?
 22 **A.** I think possibly it was just around the debt
 23 that I was holding and knowing what we were --
 24 you know, how we were commencing. If there were
 25 anything out of this that said "We're not going

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1 finalise the Part 2 report. The applicants'
 2 concerns would be with their specific cases and
 3 not how something is generally handled across
 4 the whole network."

5 Then IH is Ian Henderson of Second Sight:
 6 "[He] disagreed with the characterisation of
 7 [Second Sight's] role and based on the
 8 introduction ... did not see the point of the
 9 meeting going ahead. [Second Sight] is
 10 an independent reviewer and it was clear that
 11 [the Post Office] was treating this as if it was
 12 litigation."

13 Is this a meeting that you recall at all?
 14 I mean, they're quite strong words used there,
 15 is it not something that sticks in your memory
 16 at all?

17 **A.** It doesn't, no, I'm sorry.
 18 **Q.** Do you recall at all the relationship between
 19 the Post Office and Second Sight?
 20 **A.** No, I can remember answering questions to Second
 21 Sight but I think, at that stage, I was part of
 22 a team of five Senior Managers within FSC, so
 23 dealing from the debt point of view, I could
 24 answer questions on that, but not necessarily on
 25 every part of the work undertaken in the Finance

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1 Service Centre.

2 **Q.** Some of the topics that we've dealt with already
3 today -- and we've started with *Castleton*;
4 *Misra*; we've looked at various spreadsheets of
5 complaints that people raised about the Horizon
6 system; we've seen references to the Post Office
7 not wanting publicity about Horizon; we've seen
8 that you were aware of the receipts and payments
9 mismatch -- do you have any views or did you
10 have any views, as at 2015, about the way Second
11 Sight were being treated at this meeting or
12 during this period, or is that something you
13 simply don't remember?

14 **A.** I don't because I didn't have a lot of input
15 with Second Sight. I think it was more Rod that
16 was fronting up some of the responses that were
17 happening to Second Sight rather than myself.

18 **Q.** Can we look at POL00117439, please. 26 June
19 2015, there is a message that's communicated to
20 a large number of people by Mark Davies, the
21 Communications and Corporate Affairs Director at
22 the Post Office. You are listed there, I mean
23 it may just -- I think it's just because your
24 name begins with an "A" that you're near the top
25 but you are one of the first recipients named

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1 who took part and asked questions."

2 By the look of the distribution list, you
3 did take part in some sort of teleconference; is
4 that right? Do you recall a teleconference?

5 **A.** I think it was to all Senior Managers within the
6 business, by the looks of it.

7 **Q.** "A key request" --

8 **A.** So it was business-wide.

9 **Q.** Pardon?

10 **A.** It was business-wide that this communication
11 came out and the teleconference happened.

12 **Q.** "A key request was for a short script for use in
13 response to questions from customers,
14 postmasters, potential new operators,
15 stakeholders and others."

16 Do you know who that request came from?

17 **A.** I don't know, no.

18 **Q.** Were you looking for answers at this stage to
19 give to people?

20 **A.** I think we raised it on how do we respond if
21 there's things happening in the press or on TV
22 and postmasters raised it with us? So we did
23 ask that -- I can remember asking that question
24 and I think particularly I asked it to our Legal
25 team, to Roderic Williams, to say, "Well, how do

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1 there in this communication. If we could scroll
2 down, please. Thank you. If we could go over
3 the page. Mark Davies says:

4 "Thanks for taking part in the conference
5 call on Horizon this week. This note went out
6 yesterday and I wanted to make sure you received
7 it ..."

8 If we look down at the note, there was
9 a note from the Communications Team, it seems to
10 be a global communication of some sort within
11 the company. I'll just read you a few extracts
12 from it. He says:

13 "Hello

14 "As I think most colleagues are aware, we
15 are facing further media and Parliamentary
16 scrutiny about the Horizon system and
17 allegations about how we have handled a small
18 number of cases where losses have been
19 identified in branches."

20 If we scroll down he says there, for
21 example:

22 "I have held teleconferences over the last
23 couple of days to update colleagues across the
24 business on this new activity in relation to
25 this issue. I am really grateful to all those

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1 we respond if a postmaster says it's Horizon?"

2 **Q.** If we continue down the page, there are some
3 bullet points and he gives the key points to
4 make. He says:

5 "extremely serious, untrue allegations about
6 the Post Office and the Horizon system have
7 continued to be repeated over the past few years
8 by a small number of mainly former postmasters.
9 "the clear evidence we have in these cases
10 does not support the allegations being made."

11 We see there the other answers, the other
12 proposed key points. If we scroll down, there's
13 another one that I will read out and that's the
14 third one down. It says:

15 "if there were systemic problems with branch
16 accounting, it is reasonable to expect them to
17 have been more widely experienced across the
18 Post Office Network than the 136 individual
19 [complainants] spanning more than 10 years,
20 during which there have been 500,000 Horizon
21 users."

22 Were these points ones that were generally
23 accepted by you and your colleagues?

24 **A.** I think they were, yes. I think this came
25 through to be briefed out to our teams.

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1 **Q.** If I can take you back to your discussion even
2 later, 2018, with Womble Bond Dickinson, if we
3 can go to POL00006650, page 34, about halfway
4 down. There's comment there about entrusting
5 postmasters with a lot of the Post Office's cash
6 and stock and your answer there is:

7 "Yep and there's nothing more tempting, you
8 know, you can see a new pair of shoes or a bill
9 needs paying."

10 Was that the kind of attitude that was taken
11 at the Post Office at that time, that it wasn't
12 Horizon, it was people who wanted new pairs of
13 shoes or who had bills that needed paying?

14 **A.** Yeah, I think that was a very unfortunate
15 comment that I made, if I'm quite honest,
16 reading it myself now. There were defendants or
17 there were cases where people admitted that
18 they'd not got the children's dinner money or
19 they'd not got, you know -- financially, they
20 were in a dire situation and, yes, they had
21 taken the money.

22 So not all around Horizon where other losses
23 were there. Likewise, there were some branches
24 that we lost some large amounts from for the
25 processes that they were able to get around with

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1 The first is the NBSC and script. And I'd
2 like to return back to the Womble Bond Dickinson
3 meeting so POL00006650, and it's page 8. Thank
4 you, so the bottom of page 8 and over the page
5 to page 9. You say there:

6 "... if they were. We work with the NBSC so
7 if things like scripting, we are checking or
8 teams will check on what scriptings they've got
9 on their products to try to ensure we are giving
10 right advice out.

11 "VB -- Sorry, if somebody rang NBSC and it
12 was something that related to your area, you
13 would have had a role in checking the answers
14 were ...

15 "AB -- We try to, so since we've come to
16 work in Chesterfield I think we've tried to
17 marry up a lot more than probably when they were
18 at Dearne. So, we have done some exercises on
19 looking at different scripts, you know, are we
20 giving right advice out, and equally they will
21 come to us for advice if they've got a customer
22 on and they want a refund or something or can we
23 see anything. So we can look at different
24 systems to see transactions that have gone
25 through."

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1 Horizon.

2 **Q.** This Inquiry is looking at the culture within
3 the Post Office at the relevant times and here
4 we are, 2018, with those kinds of comments being
5 made. We have those lines to take in 2015.
6 Where do you place responsibility for that
7 culture having developed?

8 **A.** Potentially, yes, it -- on the comments that
9 were made there, then it come from me, you know.
10 I take responsibility for that. I think, from
11 a business point of view, the opinion was that
12 Horizon was correct. I appreciate that any
13 system can have flaws or issues with it and
14 I don't think we ever saw it as bugs and
15 defects, but I think there's an accountability
16 on Fujitsu to have reported it through to us, to
17 have understood what the issues were that were
18 being raised.

19 And I think that's where my concern is or my
20 concern was. So you're continuing totally naive
21 that there are issues because you don't hear
22 about them.

23 **Q.** I'm going to ask you a few miscellaneous topics,
24 it won't be very long, no more than ten minutes
25 on just a few different topics.

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1 Were you aware of any policy or specific
2 script that concerned issues with Horizon?

3 **A.** No, because it -- it's not a product. The
4 scripts that we were talking about were the NBSC
5 helpline scripts that were specific to, say, the
6 Lottery or the ATMs, or personal banking items.
7 It was around a product.

8 **Q.** To the best of your recollection, did any of
9 those scripts address situations where
10 postmasters raised issues with software issues?

11 **A.** I don't know, I think you'd have to direct that
12 at Kendra in the NBSC --

13 **Q.** Thank you.

14 **A.** -- to say what was on Knowledge Base.

15 **Q.** The next topic -- we can stay with this
16 document, it's a different page that I'm going
17 to take you to -- it's page 18. This is the
18 issue, we've discussed Credence but I also want
19 to ask you about ARQ data. At page 18, at the
20 top, you say:

21 "So we have also got access to like your
22 Credence information so we can see it by
23 transaction but what they are wanting to know is
24 are we going to give them some money back. You
25 know if they have panicked all night because

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1 they do not balance. As long as we have
 2 interface, the client file might be full we
 3 could see whether they are open ... on their
 4 account."
 5 Then you're asked:
 6 "... What is Credence?"
 7 You said:
 8 "This gives us where [POLSAP] gives
 9 a summary so that day you have done that many
 10 transactions you could basically, in Credence,
 11 you could see all, every customer's session. So
 12 you could see what they have done within that
 13 session."
 14 Were you aware that Credence didn't show the
 15 full picture of everything tracked that, for
 16 example, the Horizon trail might, that's held
 17 with Fujitsu?
 18 **A.** I subsequently have from watching this but
 19 I didn't know before.
 20 **Q.** Were you aware that there were different types
 21 of audit trails that might be obtainable from
 22 Fujitsu, that could give more information than
 23 Credence?
 24 **A.** Only from the Inquiry, no. I wasn't aware.
 25 **Q.** Thank you. One final topic and that is the
 141

1 of debt liability."
 2 Is that something that you were aware of?
 3 That, actually, if you settled centrally it was
 4 considered to be an acceptance of debt
 5 liability?
 6 **A.** I wasn't aware until Legal raised it here and,
 7 what we did from this, we asked all our teams
 8 not to issue transaction corrections on
 9 a Tuesday prior to the branch trading. So they
 10 would have at least a full day to get them. So
 11 we didn't force acceptance, as such, on the same
 12 day as received.
 13 **Q.** So the answer to the problem caused by settling
 14 centrally creating a debt liability is to give
 15 people an extra day?
 16 **A.** In some cases, yeah. I mean, that's not in all
 17 cases but some of them may have received on the
 18 same day as branch trading, so we put steps in
 19 to ensure that they didn't receive TCs a day
 20 before branch trading.
 21 **Q.** Do you think that that was sufficient for people
 22 who were experiencing, for example,
 23 discrepancies that they couldn't get to the
 24 bottom of?
 25 **A.** I don't think the majority of TCs were issued on
 143

1 ability to settle centrally. Can we look again
 2 at paragraph 31 of your witness statement,
 3 please, WITN06120100. It's page 15,
 4 paragraph 31. You say there:
 5 "The change in 2005 by the IMPACT Programme
 6 was that the local suspense needs to be cleared
 7 at branch trading, creating a branch discrepancy
 8 with the option to the branch to declare the
 9 shortage/surplus as a branch discrepancy and
 10 settle centrally (if over £150) or to make good
 11 by cash or cheque (for shortages) or remove cash
 12 (for surpluses). Local suspense does feed into
 13 the POLSAP accounts."
 14 I just want to take you to one final
 15 document while we have that in mind and that's
 16 POL00026854. This is a "[Transaction
 17 Correction]/Debt Recovery Review". Is this
 18 something you recall seeing or being involved
 19 in?
 20 **A.** I can remember seeing it in the bundle.
 21 **Q.** But not before then?
 22 **A.** I think I can vaguely remember this.
 23 **Q.** Under the section that's headed "Legal", it
 24 says:
 25 "'Settle Centrally' signifies an acceptance
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1 a Tuesday prior to branch trading. We used to
 2 get a daily report to show what TCs we had
 3 issued and sometimes branches would ask for them
 4 to be issued. So if they'd rung us up and it
 5 was a Tuesday, which normally we wouldn't issue
 6 on, then they'd ask us to issue them so they'd
 7 got them for branch trading dates.
 8 But the numbers going out on a Tuesday were
 9 not as high as on other days of the week. A lot
 10 of time the bulk TCs were issued on
 11 a Thursday/Friday.
 12 **Q.** So am I right to understand that the answer to
 13 that problem was not to change the system so
 14 that it didn't create debt liability but was to
 15 change the process by giving people an extra day
 16 in which to work out whether they needed to
 17 settle centrally or not.
 18 **A.** At least another day, yeah. It wasn't that
 19 every -- because the branches do their branch
 20 trading over four weeks, so in four different
 21 segments. So there's only so many doing --
 22 completing a branch trading on week 1. Then on
 23 week 2, week 3 and week 4. So there was
 24 different number of offices, branches,
 25 completing branch trading on different weeks.
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1 **Q.** Looking back at everything you know now and
2 issues, for example, with bugs, errors and
3 defects and the difficulty in getting to the
4 bottom of all of that, do you think that the
5 creation of a debt liability by settling
6 centrally was appropriate?

7 **A.** I think in the majority of cases, yes, because
8 I don't think that all the debt that we had was
9 caused by bugs and defects.

10 **Q.** So I'll rephrase that. In the case where
11 a subpostmaster was concerned that they were
12 suffering from a software problem caused by
13 a bug, error or defect, do you think it was fair
14 to those individuals to create debt liability
15 when they settled centrally?

16 **A.** I don't think, even just settling centrally,
17 that it was a debt liability until we sent out
18 the information to branches. So it was --

19 **Q.** Do you accept the words written there that it
20 signified an acceptance of debt liability?

21 **A.** I took the -- what Legal had said to us, yes,
22 that it was signifying a debt liability.

23 **MR BLAKE:** Thank you.

24 Sir, I don't have any questions. I believe
25 Mr Stein has some questions and then Ms Page.

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1 both Mr Winn and Mr Ismay. Mr Winn was
2 involved, in the latter part of 2010, in dealing
3 with the receipts and payments mismatch bug,
4 okay? We know that from evidence that has been
5 provided to the Inquiry this year and we know
6 that from the documents.

7 Now, Mr Ismay gave evidence earlier this
8 year on 12 May 2023 that he thought he became
9 aware of that at the latest in early 2011. All
10 right.

11 So let's piece this all together. You've
12 got these two individuals, one of them
13 essentially working for you, the other one you
14 report to, who are in the know about the
15 receipts and payments mismatch issue. Can we
16 assume that you would have learnt about it at
17 roughly the same time they did, in other words
18 latter part of 2010/early 2011?

19 **A.** Potentially, yes, and I think I may have got the
20 date wrong because I wasn't wholly involved in
21 it.

22 **Q.** Yes. Right. Now, let's move on to step 2 in
23 relation to the receipts and payments mismatch
24 issue. Now, this particular bug that affected
25 the Horizon system meant to a Post Office branch

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1 **SIR WYN WILLIAMS:** Yes. Fine, Mr Stein.

2 **Questioned by MR STEIN**

3 **MR STEIN:** Thank you.

4 Ms Bolsover, I appear on behalf of a very
5 large number of subpostmasters and mistresses,
6 instructed by a solicitors firm called Howe+Co.

7 You've been asked a few questions about
8 what's called the receipts and payments mismatch
9 issue.

10 Your evidence earlier on today was that you
11 thought that you may have become aware of that
12 at around 2013. Just help us with a little bit
13 more detail, please. Now, first of all, your
14 line manager within the FSC, was that Rod Ismay?

15 **A.** It was, yeah.

16 **Q.** Right. Andrew Winn, who's described in your
17 statement, paragraph 49, was the FSC
18 Relationship Manager. What was he in terms of
19 management responsibilities to you?

20 **A.** He was my -- I was his line manager.

21 **Q.** Right. So these two individuals, one of them is
22 essentially your managerial boss and the other
23 one you manage; is that right?

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

25 **Q.** Okay. Now, the Inquiry has heard evidence from

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1 that they could not see that there was, from
2 their accounts, an issue; but to the Post
3 Office, the Post Office could see a shortfall,
4 all right?

5 So I've described this before as being
6 effectively a submarine bug, under the water for
7 the branch but affecting, actually, their
8 accounts.

9 Now, can we assume from, therefore, your
10 evidence that you were aware that this was
11 a devastating Horizon bug?

12 **A.** I think, yes, it was.

13 **Q.** So from that point onwards, it must have shaken
14 your faith, indeed Mr Ismay's and Mr Winn's
15 faith in the Horizon system; do you agree?

16 **A.** I think it's questioned why we weren't finding
17 out about these issues.

18 **Q.** Yes. The reason why it would question about you
19 finding out about these issues was because it
20 meant that the Horizon system was completely
21 capable of actually inventing a shortfall; do
22 you agree?

23 **A.** Yes.

24 **Q.** Now, you've just been asked a few questions by
25 Mr Blake, the barrister that was asking you

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1 questions this morning, and he was identifying
2 with you the question of settling centrally.
3 You looked at with him, at the last part of his
4 questions to you, a document where it was
5 referred to, in other words settling centrally
6 means acceptance of debt liability. Okay?

7 So let's add these two things together.
8 You're aware that the mismatch bug can cause
9 real problem with branch accounts. After that
10 time, did the Post Office carry on using the
11 settling centrally system to --

12 **A.** Yes.

13 **Q.** -- effectively make subpostmasters and
14 mistresses accept their debt liability?

15 **A.** Yes, they did continue using it.

16 **Q.** Didn't that give you any qualms, any concerns,
17 Ms Bolsover, that what was going on here was
18 a Horizon system that could create bugs, was
19 nevertheless being applied by the Post Office,
20 you included, to centrally settle with branch
21 managers, that means that they accepted the
22 debt? Didn't that give you any, you know,
23 concerns, sleepless nights, worries?

24 **A.** At the time, no, it didn't because it was also
25 a mechanism to enable postmasters to settle
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1 look at the date, this from Emily Springford,
2 dated 21 September 2011. So this is after the
3 period of time that we've identified that you
4 became aware of the mismatch bug. Then we look
5 through the bottom part of this -- sorry, in the
6 middle there it says:

7 "Thank you for the update [et cetera]. My
8 preliminary view is that we should seek
9 a confidential settlement", et cetera.

10 Let's go a little bit further down. Now,
11 that's the top email. Right, thank you very
12 much.

13 So this is the email, just before the top
14 email, same date, 21 September 2011, 9.35:

15 "Dear Alison and Emily

16 "Please see below update from Joe Napier
17 regarding a former agent of Leitrim Post Office.

18 "Lietrim is on our Horizon integrity list."

19 Now, could you help the Inquiry understand
20 what the Horizon integrity list means?

21 **A.** It was whatever had been raised, either the
22 Justice for Subpostmasters or Shoosmiths cases.
23 I think it came on to that list after this date,
24 is my understanding.

25 **Q.** Right. Now --

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1 centrally and then pay off at the end of the
2 month. So, if they'd not got the cash to put
3 into the till, then they had an ability to defer
4 their payment until the end of the month.

5 So for a pluralist or somebody that had got
6 somebody else managing the branch, those offices
7 were settling centrally on everything, all
8 transaction corrections, all branch
9 discrepancies and then paying the bill at the
10 end of the month.

11 **Q.** Subpostmasters, Ms Bolsover, that have been
12 through the hell visited upon them by the Post
13 Office may be rather concerned that you and
14 other people within the FSC carried on blithely
15 applying systems that penalised them in the
16 knowledge that the Horizon system was not okay.
17 Do you want to say anything to them?

18 **A.** I am sorry for how they've suffered and I didn't
19 know any of this prior or wasn't fully aware of
20 all the issues that were raised.

21 **Q.** I'm going to refer you to a document it's
22 POL00073012. That's POL00073012. If we can
23 have that on screen, please.

24 Now, if we can highlight -- thank you very
25 much -- the top part of the document and just
150

1 **A.** So I think it referred to the solicitors, prior
2 to us being updated that later it was one that
3 was claiming Horizon integrity.

4 **Q.** Let's go a little bit further down the page and
5 we'll deal with a matter that you'd answered
6 a question about with Mr Blake earlier on, okay?
7 So we're seeing the starting point email to
8 this. That's fine, if you leave it there
9 please.

10 So again, same email chain, 21 September
11 2011, the start time is 07.27. Now, if we look
12 at what's being said on this particular page, we
13 go to -- I think it's the fifth paragraph, where
14 it says, "She pleads that she had problems with
15 her Horizon system", okay?

16 Do you see that?

17 **A.** Yeah.

18 **Q.** Next to the yellow highlight.

19 **A.** Yes.

20 **Q.** All right. So we know that this is a case
21 whereby Ms McAlerney was saying, in relation to
22 her dealings with the Post Office, that this was
23 a problem that she was having with the Horizon
24 system. It goes on to say:

25 "The records support her contention that she

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1 did call the helpline from time to time."

2 All right. So let's go back to the top,
3 let's go back to the top of where we've got
4 these emails. Let's add things up together
5 again. We've got a system that, by now, in
6 2011, you know could have a very grave fault to
7 it. You've got this particular subpostmaster or
8 mistress, in fact, dealing with a problem that
9 she's been wrestling with: contacting the
10 confidential helpline saying that there's
11 difficulties with the system. Right.

12 What is going on here, as far as we can see,
13 is that the drive by the Post Office is still to
14 pursue her.

15 **A.** Yes.

16 **Q.** Why not investigate this more deeply? Why not
17 say to her "Look, we've got some deep-rooted
18 problems with the system, we just want to check
19 to make sure yours is not one of them"? Why is
20 that not the reach from the Post Office?

21 **A.** I don't know, I can't explain that. I think if
22 you read further down the email, my
23 understanding is, from the audit report, there
24 was different questions raised as well about how
25 the branch was being managed and the "chaotic
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1 bit further. One more, that's it.

2 Right. So this is the bottom paragraph
3 there, where it says "It has been suggested that
4 there had been no actual loss", okay? If we can
5 just highlight that particular paragraph,
6 starting with "It has been suggested", thank you
7 very much.

8 It goes on to say:

9 "That cannot be correct in respect of the
10 final audit -- there being a real physical
11 deficit on inspection. The 22/11/2006 loss of
12 [£1,628] has been identified as a cheque logged
13 to the system which never arrived in the Cash
14 Centre. Again, the loss accrual can be seen;
15 the defendant having been credited for the value
16 of the cheque but POL prevented from benefiting
17 from it by being unable to cash it."

18 It goes on to say in brackets:

19 "It has been suggested that POL will have
20 had the details of the payer/payee and could
21 have been followed up once the cheque was noted
22 to be missing."

23 Let's piece that together. This appears to
24 be saying that the subpostmistress,
25 Ms McAlerney, had logged a cheque onto the
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1 state of the branch", I think it quoted, in the
2 audit report.

3 So was it being managed correctly and, with
4 all due respect to the lady, I don't know but
5 that was the comments made within the audit
6 report.

7 **Q.** You're suggesting that that might be
8 a reasonable way of covering the problem when
9 you've got direct knowledge that there are real
10 problems with the Post Office Horizon system.

11 You're saying --

12 **A.** No, I'm not --

13 **Q.** It could be that --

14 **A.** I'm not saying --

15 **Q.** It could be that this particular subpostmistress
16 is making the odd mistake and that's fine, let's
17 pursue her anyway?

18 **A.** Yes, but I think further down the email, there's
19 a £4,100 cheque that went missing, as well, so
20 the cash was never there, so which would create
21 a discrepancy.

22 **Q.** Let's go to that. Let's go to the bottom of
23 that page, please. That email.

24 **A.** Yeah.

25 **Q.** Very grateful. Further down, please, a little
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1 system that had never arrived at the Post Office
2 Cash Centre; do you agree?

3 **A.** Yes.

4 **Q.** Why would she log a cheque onto the system that
5 didn't exist?

6 **A.** I don't know (*audio disruption*) but that did
7 happen.

8 **Q.** What's the point of doing that?

9 **A.** Because there's no cash there.

10 **Q.** What, she's actually taking in a cheque, is she,
11 and putting it onto a system, for what reason?

12 **A.** Because it's either cash or cheque as a method
13 of payment or debit card.

14 **Q.** This is a cheque being logged on to the system?

15 **A.** Yes, but they don't always exist.

16 **Q.** I'm sorry? They don't always exist?

17 **A.** No.

18 **Q.** So you're --

19 **A.** Not in every case --

20 **Q.** -- suggesting that she made this up?

21 **A.** I'm not, but I'm saying not in all cases that
22 a cheque does exist.

23 **Q.** Well, she --

24 **A.** A postmaster may make his losses good by cheque
25 but never send the cheque off to the processing
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1 centre and, in which case, we can't find, as
 2 well, transactions that relate to a cheque being
 3 taken for products.
 4 **Q.** So you're suggesting that one explanation for
 5 this is that Mrs McAlerney had, in fact, put
 6 a cheque in herself for £1,628.56, in order to
 7 try to balance the system; is that what you're
 8 trying to say?
 9 **A.** No, I'm saying that's what could have happened
 10 and does happen sometimes. I'm not saying in
 11 this case it's what happened but it may have
 12 happened.
 13 **Q.** Then you're also suggesting that that cheque
 14 never --
 15 **A.** But I've got no --
 16 **Q.** Sorry, forgive me, you're talking and I'm
 17 talking. I shouldn't let that happen. You go
 18 ahead.
 19 **A.** So a cheque is dispatched with -- if they've
 20 taken a bundle of cheques that day, week, or
 21 whatever, they are dispatched daily into
 22 processing. They are all imaged and the funds
 23 are then electronically transferred to POL. So
 24 if a cheque has been classified as dispatched on
 25 Horizon and doesn't arrive, then it's

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1 Let's go down to the next part of at page,
 2 please. Thank you. This is from you to Ms van
 3 den Bogerd:
 4 "Angela
 5 "Scott Darlington -- Alderley Edge, Debt
 6 outstanding £44,193.
 7 "This is one of our top 5 cases ..."
 8 Again, you've been asked some questions
 9 about that, so let's scroll down a little bit
 10 more and we'll see a discussion of the types of
 11 cases we're talking about. Again, further down.
 12 Stop there, please.
 13 So the information that's being passed
 14 onwards within this email chain is that, from
 15 Chris Darvill -- who is Chris Darvill, can you
 16 help?
 17 **A.** He was an internal solicitor, I believe.
 18 **Q.** Okay. Sent in May 2012 to Ms van den Bogerd:
 19 "Angela
 20 "I have compared the list of branches
 21 against the known cases being fronted by
 22 Shoosmiths. 3 of the 5 cases formally notified
 23 to POL fall within the constituencies of one of
 24 the 37 MPs due to attend the meeting ..."
 25 Okay. Let's deal with the Shoosmiths part.

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1 understanding what transactions that cheque has
 2 been taken for.
 3 **Q.** Right.
 4 **A.** So the comment that we'd got information on that
 5 cheque, it's not captured on Horizon, the
 6 cheque, only the value.
 7 **Q.** Right. So are you explaining that that is the
 8 reason why, in these circumstances, that the
 9 Post Office would go after the subpostmistress
 10 in relation to the sum claimed on the cheque?
 11 **A.** Not only that, no. And I don't know why it
 12 wasn't put on hold as a potential Horizon case
 13 and it was passed to Joe Leitrim -- Joe Napier,
 14 sorry. I don't know why.
 15 **Q.** Let's remind ourselves what, in fact, did
 16 happen, was that instead she was pursued for the
 17 debt?
 18 **A.** Yes.
 19 **Q.** Let's turn to an email chain that relates to
 20 Mr Scott Darlington, POL00057991. Thank you.
 21 Now, you've again looked at this briefly with
 22 the barrister that asked you questions earlier.
 23 This was emails to Angela van den Bogerd who was
 24 at that time Head of Network Services; all
 25 right?

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1 Why does it matter that it's part of a group of
 2 cases being fronted by Shoosmiths?
 3 **A.** I don't know, because Chris wrote that. I don't
 4 know.
 5 **Q.** All right. Why does it matter that three out of
 6 the five cases formally notified to POL fall
 7 within the constituencies of one of the 37 MPs
 8 due to attend the meeting? The particular
 9 constituency MP we're concerned with here for
 10 Mr Darlington was George Osborne.
 11 **A.** I can't answer that. I wasn't involved in the
 12 MPs raising issues.
 13 **Q.** But there appears --
 14 **A.** I was --
 15 **Q.** Sorry, you go ahead.
 16 **A.** We were the recipients of information to say
 17 "Put this case on hold", not on the background
 18 of what was happening with various MPs or
 19 anything else. As such, it's a -- you know,
 20 we're processing information. We weren't
 21 dealing with the MPs' visits.
 22 **Q.** Let's scroll further down the page and see what
 23 else would have been on the email chain that you
 24 were part of. Scott Darlington, first of all.
 25 Now, various bullet points there and you'll

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1 see there that, on to the sixth bullet point in
2 relation to Mr Darlington:
3 "It is alleged that training provided was
4 inadequate, the helpline provided by POL was
5 unfairly difficult to access due to ... hours of
6 operation ... insufficiency of operators to deal
7 with the level of demand ... the Horizon system
8 suffers with inherent defects and/or an unfair
9 system of operation ... the standard operating
10 procedures used by POL make it impossible to
11 properly reconcile errors."

12 So that's what's being said there in
13 relation to a summary of Mr Darlington's issues.

14 **A.** Yes.

15 **Q.** Just go further down, we'll see Julian Wilson.
16 You'll see there the fifth bullet point:

17 "Letter before action sent by Shoosmiths on
18 23 August 2011. The issues raised in that
19 letter are more or less identical to those set
20 out in Darlington."

21 Then further down, where we have in the
22 little dotted line box "GRO"?

23 **A.** Yeah.

24 **Q.** We'll see the GRO has been substituted for
25 an individual's name. Again, can you scroll

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1 **Q.** Ms Bolsover, by this time in 2012, what was
2 going on was that considerable concerns had been
3 raised about Horizon, MPs are being involved,
4 Shoosmiths are bringing their cases together,
5 the JFSA is involved in the background, *Computer*
6 *Weekly* is publishing issues that relate to it,
7 these cases needed to be stamped out, didn't
8 they? You needed to make good on these claims
9 and pursue them; do you agree?

10 **A.** I don't think we did pursue them. But they were
11 initially not just debts that were put on to the
12 customer account; they were sent to the Security
13 teams. But I don't disagree with you.

14 **Q.** Ms Bolsover, the individuals I've been asking
15 you some questions about, Ms McAlerney,
16 Mr Darlington, their families are in this room
17 where I sit at the Inquiry centre for the Post
18 Office Inquiry. Is there anything you would
19 like to say to them?

20 **A.** I'm just very sorry for what they've been
21 through. Potentially, I didn't believe that
22 there was a problem with Horizon. Subsequently,
23 I'm shocked about how things were not identified
24 or not investigated properly, and that I can
25 only say sorry.

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1 down a little bit further, please. Thank you
2 very much.

3 We see the second to last bullet point,
4 reference to court proceedings being commenced
5 in June 2011, and then the final sentence there:

6 "The allegations made are in almost
7 identical terms to the claims made in both the
8 Darlington and Wilson cases."

9 So can we again pull this all together.
10 These are all cases where identical concerns are
11 being raised about the system having many
12 problems, defects in training, access to
13 helplines, defects in the system, et cetera.
14 Why were these three cases being picked on by
15 the Post Office?

16 **A.** I don't necessarily think they were being picked
17 on. I think, reading this again now, both of
18 the two that you've said, excluding this one
19 that was a spent debt at that point anyway, they
20 were both Legal -- they were both Security
21 cases, that were criminal prosecutions, that
22 wouldn't have necessarily gone through my teams,
23 these two. So we wouldn't have proceeded with
24 civil requests until the Security had ended
25 their prosecution, as such.

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1 **MR STEIN:** Sir, no further questions.

2 **SIR WYN WILLIAMS:** Mr Blake, did you say that there
3 was another --

4 **MR BLAKE:** Ms Page.

5 **SIR WYN WILLIAMS:** Ah yes, right.

6 **Questioned by MS PAGE**

7 **MS PAGE:** Ms Bolsover, I'm asking questions also on
8 behalf of a group of subpostmasters and the
9 short first area of questioning I want to ask
10 you about is the non-commercial pursuit of debts
11 and there's a document that I'll show to you
12 that deals with that.

13 So if we could have POL00121191, please. If
14 we zoom in at the top there the heading says,
15 "Proposal for transfer of Write off authority
16 for Former Subpostmaster Accounts cases", and
17 then it sets out the years that we're talk
18 about, so we're talking about 2002 going into
19 2003, and it says "from Commercial and Community
20 Finance Managers to Transaction Processing".

21 So this seems to be a change of process
22 about write-off; is that right?

23 **A.** Yes, because I believe the Former Agents
24 Accounts were out. Before 2005 they sat out in
25 the Network. But they were transferred in when

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1 the IMPACT Programme happened.

2 **Q.** Yes, and in that first paragraph, what we see

3 is:

4 "The current process means that cases over

5 £500 are documented and sent to the commercial

6 and community finance managers ..."

7 So that means out in the Network, yes?

8 **A.** Yes.

9 **Q.** "This is a fairly simple process but recently we

10 have received a number of queries regarding the

11 cases insisting that we continue investigations

12 even though we have been advised by Legal

13 Services that it would not be cost effective to

14 do so."

15 So what we see there is a suggestion that it

16 is out in the Network that there was a desire

17 sometimes to pursue cases when it wasn't

18 economically sensible to do so on Legal Services

19 viewpoint?

20 **A.** That's what I understand. I receive this last

21 night.

22 **Q.** It does say in the third paragraph that you

23 attended a meeting but perhaps you don't

24 remember that. It says you attended a meeting

25 with Tony Marsh and Phil Gerrish to discuss

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1 accounts with POL's clients, yes, like the banks

2 and National Lottery, and so forth?

3 **A.** Yeah.

4 **Q.** What I'd like to go to is the findings of Detica

5 about these processes in 2013. So that's

6 document POL00029677, please. So we see from

7 this front page what they were asked to look at,

8 "Fraud and Non-conformance in the Post Office",

9 and if you've watched previous hearings, you

10 might have seen this document before. What I'd

11 like to do, please, is go to page 20 and scroll

12 down to paragraph 4.3.2.

13 This is dealing particularly with the

14 reconciliation of ATM data and then I'll go over

15 the page where it talks about reconciling cash

16 data. So this says:

17 "ATM withdrawal data is collected by Wincor,

18 manually manipulated and provided to the Post

19 Office where it is emerged in POLSAP to

20 chess-check submitted 16.30."

21 Just pausing there, does that mean that the

22 cross-check is that the postmasters had to

23 submit information from the cashpoint at 4.30

24 each day; is that right?

25 **A.** I believe so. Back in 2013, I didn't manage the

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1 accountabilities?

2 **A.** Yeah, and I am imagining this was probably when

3 I'd just taken over the debt recovery role.

4 **Q.** But you have no particular memory of it?

5 **A.** Not really, no.

6 **Q.** Well, you may not be able to answer the question

7 I was going to ask, then, which is really why do

8 you think it was that Finance Managers out in

9 the Network wanted legal action to take place

10 even when it wasn't economical to do so?

11 **A.** And I can't answer that, I'm sorry. I think

12 they didn't accept that we couldn't collect the

13 debt that was sat within the -- originally

14 within their accounts and, if we couldn't trace

15 a former subpostmaster, then we couldn't take

16 any further steps and I think it was pointing

17 that out to Tony that, you know, we were being

18 asked to do the impossible, because we

19 couldn't -- just couldn't pursue them. But

20 I don't know why commercial and community

21 Finance Managers believed we could.

22 **Q.** All right, well, that can come down. Thank you.

23 I'll move on, then, to a bigger issue for

24 you. You've described how your teams had to

25 match and reconcile data from Horizon branch

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1 ATM data but I subsequently did and they pulled

2 a report out of the system, is my understanding,

3 out of the ATM, that gave their 16.30 withdrawal

4 figures.

5 **Q.** It goes on:

6 "This information should be supplied as

7 an automated feed and made available beyond just

8 the Financial Services Centre, whose

9 responsibility is to account for ATM payments

10 and settle with Bank of Ireland rather than

11 detect error."

12 It goes on at the bottom there to say:

13 "Additionally a direct data feed would

14 negate the need to cross-check data, and for

15 branch staff to manually obtain and input this

16 data on a daily basis."

17 If we go over to 4.3.3, similar points are

18 made with regard to cash. It says:

19 "Currently declared figures, ended by branch

20 staff are used as the basis for cash dispatch.

21 This information has to be extracted daily from

22 Horizon as it only stores the last entry.

23 Currently the process relies on manual

24 intervention, given the value to the Post Office

25 in identifying discrepancies within branches it

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1 should be automatically stored as an historical
 2 record and made more widely available."
 3 There's conclusions from this which I'll
 4 just go to, as well, before we have some
 5 thoughts and questions about this.
 6 So if we go down to page 21, 4.3.3 -- sorry,
 7 page 37, 7.2.2. Scroll down a little. The
 8 heading there "Complex and fragmented systems":
 9 "Post Office stammers not fit for purpose in
 10 a modern retail and financial environment. Our
 11 primary concern here relates to difficulty in
 12 reconciling information from multiple
 13 transaction systems both in terms of timeliness,
 14 structure and access."
 15 It deals with various examples and, if we go
 16 over to the top of page 38, the conclusion is
 17 this:
 18 "Failure on this scale indicates that there
 19 is a fundamental issue with the process or
 20 controls in place around cash balancing. As if
 21 to underline the point, a Key Risk Indicator
 22 recognised by both the Fraud Analysis team and
 23 the Pilot, is that of a branch that is too good
 24 at matching these numbers; rather than branches
 25 that balance perfectly every time being seen as
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1 licence to that, by -- only a few across the
 2 business, maybe 50 licences.
 3 **Q.** Was there ever --
 4 **A.** But I --
 5 **Q.** Sorry.
 6 **A.** I don't know what Sally did with the Detica
 7 report or if anything -- a product came out of
 8 that. I don't know.
 9 **Q.** On your side of things, though, was there ever
 10 any attempt to automate so that there was no
 11 longer the need for these manual
 12 reconciliations?
 13 **A.** Yes, so --
 14 **Q.** Was that the PING project?
 15 **A.** The PING Project for Lottery, PING for pay
 16 station, prior to me leaving, there was talk of
 17 ATMs, the data being PINGed, as such, but then
 18 another project being run, as I left, in 2021,
 19 the changes to ATM reporting and how branches
 20 would report. And I think it was always
 21 a concern, when branches had kit that wasn't
 22 attached to Horizon, it was then down to manual
 23 input, which, in every scenario, human error can
 24 happen. So I think we were trying to tie the
 25 kit up for various products.
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1 'good', this is seen as an indicator of branches
 2 that are 'bad', with several cases of perfectly
 3 balancing branches found to be fraudulent."
 4 So there's some pretty strong words there.
 5 That document can come down.
 6 In essence, what Detica was saying in 2013
 7 was that the way that POLSAP reconciled data
 8 from Horizon and from the various other systems
 9 was not fit for purpose and that it was causing
 10 significant difficulties. Were those findings
 11 shared with you when you took on the role that
 12 you said you took on subsequent to this?
 13 **A.** No, the Fraud and Non-Conformance team moved
 14 from Product and Branch Accounting or
 15 Transaction Processing into Security. So
 16 I believe the Detica report was sent to
 17 Security --
 18 **Q.** Not to you?
 19 **A.** -- in 2013 -- no, I'd not seen that report.
 20 **Q.** So --
 21 **A.** I don't know what the outcomes from that or what
 22 improvements were offered after that report.
 23 I can vaguely remember we started using a system
 24 called HORice where you could see more detailed
 25 transaction levels but there was only limited
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1 **Q.** All right. Well, prior to the tying up, as it
 2 were, can you just help with a bit of process
 3 around what Detica called these complex and
 4 fragmented systems. Was your department
 5 carrying out daily reconciliation of what was
 6 going on with the Horizon feeds and what was
 7 going on with the client feeds?
 8 **A.** Yes, for certain products. So some -- selling
 9 a stamp would not be a matched product but it
 10 would need to be fed and it would go into
 11 another area, not my area, to be paid to Royal
 12 Mail. Bill Payments went straight through to
 13 pay BT, or whatever bill provider. So the
 14 information from Horizon went straight into
 15 vendors to pay our clients but there was no
 16 matching, so no matching routines taking place
 17 from anywhere else, so there was no client data.
 18 It all fed from Horizon.
 19 **Q.** Did the clients, like BT or whatever, not
 20 provide you with a data stream, then?
 21 **A.** No. Not for Bill Payments, no.
 22 **Q.** What about banks?
 23 **A.** No.
 24 **Q.** No?
 25 **A.** We supplied it to them.
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- 1 Q. Right.
- 2 A. So we took the payment, and it was paid to which
- 3 bank, A, B or C, whichever bank it was paid
- 4 to -- or withdrawal. You know, it was either
- 5 a deposit or a withdrawal from a bank. But the
- 6 information went directly into SAP, into
- 7 a vendor, to either pay or receive money from
- 8 the clients.
- 9 Q. So, unless the branch raised an issue it was
- 10 always assumed, was it, that that data going to
- 11 the client was correct --
- 12 A. Yes.
- 13 Q. -- or presumably if a client raised an issue?
- 14 A. Yes. A client could raise an issue back to us,
- 15 so a customer could say, "This is not correct".
- 16 So when we were -- when we take bill payments in
- 17 a branch for whatever bill, the record is there
- 18 in branch. That sends a value information into
- 19 POLSAP to pay the client, but the client also
- 20 gets a data file to update their records to say
- 21 "This bill has been paid", or "This bill's
- 22 credited through the banking system".
- 23 Q. Right. So if a client said that there was
- 24 something wrong about that, they would raise it?
- 25 A. Yes.

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- 1 from them, then it would fall to the postmaster,
- 2 wouldn't it?
- 3 A. It would, yeah.
- 4 Q. All right, because --
- 5 A. I think there were changes really late -- in the
- 6 last year or so that I was there, there were
- 7 changes made to that and the processes around it
- 8 to allow -- as such, allow the credits to be
- 9 given --
- 10 Q. All right, but for most of the period we are
- 11 dealing with, unless the client agreed they had
- 12 got it wrong or the customer agreed they had got
- 13 it wrong, there would be no credit transaction
- 14 correction issued, would there?
- 15 A. No, because we'd got no money to pay them back
- 16 with.
- 17 Q. All right. Well, just focusing on that for
- 18 a moment, because we now know that sometimes
- 19 Horizon created fictitious shortfalls. So you
- 20 would have potential for the situation to
- 21 develop where Horizon had got it wrong, the
- 22 client was right in saying, "No, we don't owe
- 23 you any money", and, nevertheless, it would fall
- 24 to the subpostmaster to pay this fictitious
- 25 shortfall, yes?

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- 1 Q. If --
- 2 A. So (*audio disruption*) bank enquiries, yes.
- 3 Q. If there was a query raised by a client, was it
- 4 assumed that they were correct, or what?
- 5 A. We would investigate it with the branch. So we
- 6 would ask them about the transaction or what the
- 7 customer claimed. So although there was bank
- 8 inward enquiries coming in, we were pushing
- 9 a lot out to banks where postmasters had keyed
- 10 the wrong amount. So if they'd keyed -- if
- 11 they'd had a deposit for £200 and keyed 2,000,
- 12 we had -- they raised it with the NBSC and we
- 13 contacted the banks. But it had to be the
- 14 customer giving authority to the banks to deduct
- 15 that amount. And a lot of the time the
- 16 customers come back and say, "No, I did put
- 17 £2,000 in".
- 18 Q. All right. So you've got information sources
- 19 coming from the branch, from the customer and
- 20 from the client, yes?
- 21 A. Yeah.
- 22 Q. If there was a dispute, though, and the client
- 23 refused -- let's say in the case of a shortfall,
- 24 if the client refused to accept that they had
- 25 something wrong and that any money was owing

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- 1 A. Can you just put that to me again? I'm sorry.
- 2 Q. All right, let's imagine a situation where the
- 3 Horizon data is wrong; it's created a fictitious
- 4 shortfall --
- 5 A. Yeah.
- 6 Q. -- yeah? So, when there's then the
- 7 investigation, and you've spoken to the client
- 8 and the client says, "No, no, we don't owe you
- 9 anything", and the customer likewise, if they've
- 10 been able to be got hold of, they say, "We don't
- 11 owe you anything", that fictitious shortfall is
- 12 still going to be paid by the subpostmaster,
- 13 yeah?
- 14 A. I think I would agree in some respects but, on
- 15 the other, if it was a transaction that was put
- 16 in to Horizon as a Bill Payment, then that's
- 17 what the client's receiving. The information
- 18 that it -- I think it's --
- 19 Q. Okay, but let's say it's a bank situation where
- 20 there's a deposit and Horizon has, in fact,
- 21 created a deposit sum which really didn't exist.
- 22 A. Then it wouldn't have a customer number to
- 23 attach any -- and give to the client.
- 24 Q. Well --
- 25 SIR WYN WILLIAMS: Ms Page, I, as you know, have

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1 been very tolerant of hypothetical situations
 2 and scenarios but I think we're going a bit too
 3 far now.
 4 **MS PAGE:** What I'd like to get to, if I may, sir, is
 5 what went on with clients' suspense accounts
 6 because there were sometimes millions held in
 7 clients' suspense accounts, weren't there?
 8 **A.** No. I don't know if you can broaden out on what
 9 a client's suspense account was.
 10 **Q.** Well, as I understand it, each Post Office
 11 client had a suspense account where there was
 12 sums held if there were disputes over those.
 13 You say that didn't exist?
 14 **A.** *(Unclear)*
 15 **Q.** Well, maybe that's not something you can answer
 16 questions about, then.
 17 **A.** Not to my knowledge, no, there wasn't client
 18 suspense accounts. Sorry, I'll disagree. I'll
 19 disagree with myself. There was an account, if
 20 we had a cheque processed with a credit, so we
 21 knew that I had paid -- or a cheque had been
 22 cleared in my name but the postmaster had not
 23 stamped the back of the cheque or done anything
 24 to identify it was their branch, then we put it
 25 into a suspense account awaiting a customer to

1 come back to us to marry that position up. But
 2 we wouldn't hold -- we only held them if we
 3 couldn't allocate them to branch or to a client,
 4 or whatever.
 5 **Q.** Were you --
 6 **A.** But --
 7 **Q.** -- anything to do with what happened at the end
 8 of whatever period they were managed under?
 9 Were you anything to do with what happened to
 10 sums held in clients' suspense accounts?
 11 **A.** No, but there's still suspense accounts now.
 12 **Q.** For sure. But my question is, did you have
 13 anything to do with the process or management of
 14 what happened with sums held in client suspense
 15 accounts?
 16 **A.** Not particularly, no.
 17 **Q.** No.
 18 **A.** I think it -- I'd have to really home in on what
 19 we meant by -- I think your definition of
 20 a client suspense might be different to mine.
 21 **Q.** Well, it rather sounds like I'm not going to be
 22 able to get any further with what I was going to
 23 ask about.
 24 **A.** Yeah.
 25 **Q.** All right. Because you're saying that you're

1 not aware of large sums being held in those
 2 accounts?
 3 **A.** I don't believe so, no.
 4 **MS PAGE:** All right. Thank you.
 5 **SIR WYN WILLIAMS:** Thank you, Ms Page.
 6 Is that it, Mr Blake?
 7 **MR BLAKE:** Yes, it is, sir. Thank you.
 8 **SIR WYN WILLIAMS:** Well, thank you, Ms Bolsover, for
 9 coming to give evidence and, before that, for
 10 making a detailed witness statement. I'm
 11 grateful to you.
 12 I think we have one witness tomorrow,
 13 Mr Blake?
 14 **MR BLAKE:** Yes, 10.00 tomorrow. Yes.
 15 **SIR WYN WILLIAMS:** Can I just say to the Core
 16 Participants who made a special effort to come
 17 to the hearing today that, notwithstanding that
 18 the evidence was given remotely, I hope they
 19 have found the session informative and
 20 constructive. Thank you.

21 **(3.20 pm)**
 22 **(The hearing adjourned until 10.00**
 23 **the following day)**
 24
 25

I N D E X

ALISON BOLSOVER (affirmed)	1
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