

Tuesday, 14 November 2023

1
 2 (10.00 am)
 3 MR BLAKE: Good morning, sir, can you see and hear
 4 me?
 5 SIR WYN WILLIAMS: Yes, I can.
 6 MR BLAKE: Thank you. Can I call Ms Stapel, please.
 7 SIR WYN WILLIAMS: Yes.
 8 MR BLAKE: Thank you.
 9 DEBBIE STAPEL (affirmed)
 10 Questioned by MR BLAKE
 11 MR BLAKE: Thank you very much. Can you give me
 12 your full name, please?
 13 A. Yes. My name is Debbie Stapel.
 14 Q. Thank you, Ms Stapel. You should have in front
 15 of you a witness statement dated 15 October 2023
 16 and it should be in the first of the bundles in
 17 front of you behind, I think, tab A.
 18 A. Yes, it is.
 19 Q. Thank you. Can I ask you to turn to page 38 of
 20 that statement, please.
 21 A. Yeah.
 22 Q. Can you confirm that's your signature?
 23 A. Yes, it is.
 24 Q. Is that statement true to the best of your
 25 knowledge and belief?

1

1 A. That was Debbie Helszajn.
 2 Q. Thank you very much. In 1997, I think you took
 3 maternity leave followed by a very short career
 4 break and returned in 2001; is that correct?
 5 A. That's correct.
 6 Q. Between 2001 and 2006, you worked on what you've
 7 referred to in your statement as counter cases
 8 and letter cases, counter cases being cases that
 9 involve Crown Office employees, subpostmasters
 10 and their assistants, and letter cases involving
 11 postmen and postal packets and things like that;
 12 is that correct?
 13 A. That's correct.
 14 Q. I think you've said that you largely stopped
 15 being involved in counter cases in 2006, except
 16 for the case of Carl Page, which is a case we're
 17 going to come to today; is that right?
 18 A. That's correct.
 19 Q. Thank you. You left the Post Office in 2013?
 20 A. I did.
 21 Q. I think you left to run a hotel which you still
 22 continue to run now; is that correct?
 23 A. That's correct.
 24 Q. Having come back from maternity leave and
 25 a career break in 2001, so that was shortly

3

1 A. Yes, it is, save that I omitted -- simply
 2 because I'd forgotten -- that, prior to joining
 3 the Criminal Law Team, I worked for the CPS for
 4 four months.
 5 Q. That was at Maidstone?
 6 A. That was at Maidstone.
 7 Q. Thank you very much. That witness statement has
 8 the URN WITN08900100. That statement will go
 9 into evidence and it will be published on the
 10 Inquiry's website. The questions I'm going to
 11 ask you will be supplementary to that and will
 12 aim to clarify a few matters and seek further
 13 information where appropriate.
 14 You qualified as a barrister and were called
 15 to the Bar in 1987; is that correct?
 16 A. That is correct.
 17 Q. As you say, there was a brief period I think in
 18 private practice and then working for the CPS,
 19 but soon after, 1989, you joined the Post Office
 20 Criminal Law Team?
 21 A. That's correct.
 22 Q. I think we'll see your name on a number of
 23 documents, in your maiden name; is that correct?
 24 A. That's correct.
 25 Q. What was that?

2

1 after the rollout of Horizon, do you recall any
 2 significant changes in prosecutorial policies or
 3 training on your return?
 4 A. On my return, as I recall it, the cases that
 5 were being submitted for advice were still very
 6 much the old style cases involving, on the
 7 whole, pension allowance overclaims or
 8 inflation, but obviously, with the rollout, as
 9 things were going to radically change, or at
 10 least they were going to change once the pension
 11 allowances stopped, which I think was in 2003,
 12 so I know that I wasn't involved in it, but
 13 I know that Mr Heath was obviously involved in
 14 looking into how prosecutions could continue.
 15 Q. In terms of the policies that were followed
 16 within the Criminal Law Team and the training
 17 that was involved that was provided to lawyers
 18 within that team, did anything significantly
 19 change once Horizon had been rolled out?
 20 A. No, we had a day's Horizon training but, other
 21 than that, no.
 22 Q. Had you been told of any issues with Horizon?
 23 A. Absolutely not. We were told that it was,
 24 effectively, this super system. There was
 25 certainly no indication that there were any

4

1 problems with it.

2 **Q.** Thank you. Ms Stapel, your speed is perfect.

3 Your volume could do with being raised slightly,

4 if possible?

5 **A.** I'm sorry.

6 **Q.** Thank you very much. You may need to just speak

7 slightly closer to the microphone.

8 Teresa Williamson has described a lack of

9 collaboration within the Criminal Law Team,

10 a lack of sharing of knowledge, for example.

11 Was that your experience or did you have

12 a different experience.

13 **A.** It depends on what you mean by "sharing of

14 knowledge". If anyone had had a case that had

15 involved a bug or a defect, then that would have

16 been flagged up to -- or it should have been

17 flagged up to Mr Wilson, and we did have team

18 meetings. I think they varied between once

19 a fortnight, once a month, where any issues of

20 concern would be raised.

21 And I think, on a day-to-day basis, lawyers

22 would discuss cases, not every day but, if you

23 had had something unusual or if you were

24 considering the public interest test and wanted

25 a second opinion, you'd discuss it with another

5

1 **Q.** How was the Code made available: was it on the

2 intranet, on people's desks?

3 **A.** No, we all had a copy of the Code on our desk.

4 **Q.** When you say you "all" --

5 **A.** All the lawyers.

6 **Q.** That was something you saw around the office,

7 was it?

8 **A.** Absolutely, yes.

9 **Q.** Can you assist us with what were the key

10 prosecutorial guides or rules that were

11 available outside of the Code for Crown

12 Prosecutors?

13 **A.** I'm not sure what you mean, sorry.

14 **Q.** Were there any other policies that were

15 regularly consulted?

16 **A.** No. Not that I can recall.

17 **Q.** Did you use the internal intranet to find

18 policies or?

19 **A.** So I don't know at what point this happened but,

20 by the "internal intranet", I presume you're

21 referring to the corporate security database.

22 So the corporate security database, in order to

23 access it, you had to have a password. So,

24 initially, that was very much -- the intranet

25 was very much for Security. So it wasn't

7

1 lawyer.

2 **Q.** Obviously the words "would have" and "should

3 have" are very different when you speak about

4 bugs, errors and defects, and that they would

5 have been raised or should have been raised.

6 Which one is it, and why?

7 **A.** Well, I would have hoped that they would have

8 been raised. I think it was always clear that,

9 if there were any issues in a case, that they

10 should be flagged up to the team leader. Sorry,

11 not the team leader, the head of criminal law,

12 so Mike Heath to begin with and then Rob Wilson.

13 **Q.** Did you experience that knowledge being shared?

14 **A.** Of?

15 **Q.** Of bugs, errors and defects?

16 **A.** Absolutely not.

17 **Q.** I want to ask you about the Code for Crown

18 Prosecutors. Both yourself and Ms Williamson's

19 evidence has been that the Code was the primary

20 policy that was consulted within your team and

21 you said it was followed at all times. Do you

22 know if there was monitoring or how can you be

23 so certain that it was followed at all times, or

24 were you just talking about yourself?

25 **A.** I was talking about myself.

6

1 something that Legal Services could add

2 a document to. It was theirs. So there came

3 a point that I know I asked for access to it and

4 we were all issued with passwords.

5 **Q.** Are you able to assist us with what period that

6 was?

7 **A.** I'm afraid I can't.

8 **Q.** Did it contain useful documents for people in

9 the Criminal Law Team or was it principally, as

10 you said, a security?

11 **A.** It was principally a Security thing. I wanted

12 access on it, if there was an issue on a case in

13 terms of something an Investigator had done, to

14 refer to the guidance on there to see whether it

15 was clear and whether, had they referred to it,

16 they wouldn't have done what they'd done.

17 **Q.** You talked about the Code for Crown Prosecutors.

18 Was that on the intranet or was that just

19 something that you had in hard copy?

20 **A.** I just had it on hard copy.

21 **Q.** That Code, as we know, contains something called

22 the Full Code Test, which has two parts:

23 an evidential stage and a public interest stage.

24 Were you aware of any specific guidance or

25 factors that needed to be considered at the

8

1 public interest stage that were specific to the
 2 Post Office?
 3 **A.** Specific to the Post Office?
 4 **Q.** Well, was there any specific guidance that
 5 addressed that public interest stage?
 6 **A.** No.
 7 **Q.** I think --
 8 **A.** Or not that I can recall, I should say.
 9 **Q.** At paragraph 29 of your witness statement,
 10 you've said that usually health was a matter
 11 that was considered or I think false accounting
 12 under £5,000. Was that just something that was
 13 known within the office, was it something that
 14 was set out somewhere?
 15 **A.** No, it was something that was agreed, I presume,
 16 at an office meeting.
 17 **Q.** Was that well known to all those who worked in
 18 the Criminal Law Team?
 19 **A.** Yes.
 20 **Q.** Was it principally those two factors?
 21 **A.** Health and -- one of the other -- well,
 22 I suppose it's ill health but, on occasion,
 23 a burglary -- a -- a burglary would have been
 24 committed at an office and that would be raised
 25 at interview, and those would be one of the

9

1 why Andrew Wilson wrote it, I don't know who it
 2 was aimed at but it's a muddle, and it certainly
 3 wasn't taken into account in making prosecution
 4 decisions.
 5 **Q.** I'll just read a few extracts from it, and
 6 please do assist me if there's anything in
 7 particular that you think is a muddle that
 8 I haven't read out then please do say. Under 2
 9 it says:
 10 "There is no single statement of current
 11 policy but it can be summed up as normally to
 12 prosecute all breaches of the criminal law by
 13 employees which affect the Post Office and which
 14 involve dishonesty."
 15 If we go over the page to page 3, if we
 16 scroll down slightly, another passage I'm going
 17 to read out:
 18 "In order to provide a deterrent and to
 19 serve the public interest, it is clearly
 20 necessary to prosecute offenders in the criminal
 21 category."
 22 Just pausing there, to what extent did
 23 deterrents come into play, in prosecutorial
 24 decision making?
 25 **A.** I think deterrents probably came more into play

11

1 circumstances in which I would send papers back
 2 to find out the impact it had had on the
 3 subpostmistress or master and also the
 4 circumstances, ie was violence used or ...
 5 **Q.** So is that a case where you may have been
 6 prosecuting the subpostmaster but they
 7 themselves were a victim --
 8 **A.** Absolutely.
 9 **Q.** -- and that that may factor in to the public
 10 interest?
 11 **A.** Absolutely.
 12 **Q.** Thank you. I'm going to bring up our first
 13 document today. It's POL00030659. It's
 14 a document that a witness has already been taken
 15 to quite recently. It's called the "Post Office
 16 Internal Prosecution Policy -- Dishonesty".
 17 Your evidence in your statement is that this
 18 isn't a policy that would have been used by Post
 19 Office lawyers; is that correct?
 20 **A.** Absolutely not.
 21 **Q.** Is it something that you were aware of?
 22 **A.** I think I'd seen it -- I was aware of it, yes,
 23 and I couldn't understand it because it doesn't
 24 make sense on a lot of levels, in terms of what
 25 was prosecuted and what wasn't. I don't know

10

1 in -- if I can call them letters cases.
 2 Obviously, if, for example, you had a greetings
 3 card thief, it was important that postmen
 4 understood that if they stole mail or they
 5 didn't deal with mail correctly, then they
 6 risked prosecution and I think it was seen as
 7 a deterrent but, obviously, that wasn't the sole
 8 criteria for prosecuting.
 9 **Q.** If we look down at the bottom of page 3, it
 10 seems to attempt to formulate a prosecution
 11 policy as follows:
 12 "The Post Office's policy is normally to
 13 prosecute those of its employees or agents who
 14 commit acts of dishonesty against the Post
 15 Office for the purpose of illegally acquiring
 16 Post Office property or assets, or the property
 17 or assets of Post Office customers and clients
 18 while in Post Office custody, where this is
 19 deemed to serve the public interest. Other
 20 wrongdoings will normally be dealt with via the
 21 Discipline Code."
 22 Is it that kind of thing you're referring to
 23 as a bit of a muddle?
 24 **A.** Yes, and also further up the document there's
 25 reference to wilful delay and intentional

12

1 detail -- sorry, wilful delay, which later
2 became intentional delay, and I think there's
3 mention of criminal damage. Obviously, neither
4 those are offences of dishonesty but they were
5 routinely prosecuted.

6 **Q.** Thank you. I'm going to move on to identifying
7 who the prosecution decision makers were and I'd
8 like to begin with your witness statement. Can
9 we please bring up on screen WITN08900100. It's
10 page 9, paragraph 23 that I would like to look
11 at.

12 Sir, I'm being told that there is a issue
13 with live broadcast on YouTube. I am happy to
14 proceed with the hearing and perhaps that can
15 just be fixed while we're proceeding, unless
16 you'd prefer it to be paused.

17 **SIR WYN WILLIAMS:** Well, no. My normal practice to
18 proceed unless there's likely to be such
19 a substantial delay that members of the public
20 or whoever else was watching would really not
21 get any idea of what's occurring. So what I'd
22 like to do is to proceed but, if there's a real
23 risk of a complete breakdown, so to speak, for
24 me to be notified of that.

25 **MR BLAKE:** Thank you very much.

13

1 **A.** It was.

2 **Q.** Yes. If you had said that there was sufficient
3 evidence and the Full Code Test was met, that
4 ultimate decision maker, could they still take
5 a different decision not to proceed?

6 **A.** They could -- they could put their reasons why
7 they disagreed with the public interest part,
8 which is what they were concerned with, and the
9 papers would be returned to us and we would
10 consider what they had said.

11 **Q.** Did you experience or hear of cases where the
12 lawyer had said that something was not in the
13 public interest but, nevertheless, the
14 prosecution proceeded?

15 **A.** Sorry, can you say that again?

16 **Q.** Did you hear of or experience any cases where
17 the lawyer had said that something didn't meet
18 the full test because of the public interest
19 aspect of that test but, nevertheless, the
20 prosecution proceeded?

21 **A.** No.

22 **Q.** No?

23 **A.** No.

24 **Q.** Can you assist us with what level of oversight
25 external counsel provided? So was counsel

15

1 So if we have a look at paragraph 23 you say
2 there:

3 "Where the evidence was sufficient to afford
4 a realistic prospect of success and it was in
5 the public interest for a prosecution to ensure
6 the lawyer would advise appropriate charges.
7 The file would then be returned to the casework
8 manager who would in turn forward it to the
9 relevant person or authorisation."

10 Now, that relevant person, was that person
11 a lawyer or a policy specialist, or something
12 else?

13 **A.** No, they weren't a lawyer. I can no longer
14 recall what job they held.

15 **Q.** If you or a member of your team had taken the
16 view that the Full Code Test wasn't met, for
17 example because of a suspect's health or
18 something along those lines, would it still go
19 to the nominated decision maker or would that be
20 a total bar to proceeding?

21 **A.** No, it would go to the Casework Manager and the
22 papers would be closed.

23 **Q.** So, in effect, was your assessment final, in
24 terms of the decision to prosecute, despite the
25 fact that --

14

1 routinely instructed or occasionally instructed
2 to advise on the evidential test, on the public
3 interest test?

4 **A.** In rare cases. So in complex cases they were
5 instructed from the very beginning.

6 **Q.** Would they advise on both aspects of the test or
7 was the public interest test something that --

8 **A.** They would advise on both aspects.

9 **Q.** Thank you very much.

10 I'd like to look at a second document. It's
11 POL00031012. You'll have seen this document in
12 your pack. If we turn over the page, it's
13 a March 2000 document. Thank you very much. If
14 we go back to page 1, it's something called an
15 "Investigation and Prosecution Policy". If we
16 could look at paragraph 3.3 and 3.4, I'll just
17 read those. Paragraph 3.3 says:

18 "Where evidence of crimes committed by
19 a Consignia employee against Consignia or its
20 customer is established, the offending employee
21 may also be dealt with in accordance with
22 criminal law. The prosecution guidelines of the
23 business will be used in making any decision to
24 proceed under criminal law, in consultation with
25 SIS ..."

16

1 Just pausing there, do you know what SIS
2 stood for?

3 **A.** Do you know what, I did, but I can't remember.
4 I've been trying to work it out. Senior --
5 Senior -- I'm sorry, I just can't recall. But
6 I think it's someone senior in the
7 Investigations Team.

8 **Q.** "... and Legal Services Criminal Law Division
9 where appropriate."

10 Then it says:

11 "The main Consignia interface with other
12 agencies, eg Police, Customs, Interpol, DSS,
13 etc, is SIS. There are occasions where an SIS
14 Investigator or an Investigator within the
15 Business United will necessarily hand
16 an offender into Police custody. In these cases
17 the decision to instigate prosecution is made by
18 SIS."

19 Are we to understand from this, and perhaps
20 your knowledge from subsequent policies, that
21 the Legal Services Criminal Law Division was
22 a division to be consulted but was not, in fact,
23 the ultimate decision maker in respect of
24 whether to proceed or not?

25 **A.** That's correct.

17

1 **A.** I do know that, for example, in a pension
2 allowance overclaim case where, for example, the
3 defence would say there wasn't a stop notice,
4 under Horizon you would physically scan the book
5 and Horizon would tell you that it should be
6 confiscated and the payment shouldn't be made.
7 So I think ARQ was used to show whether the book
8 had been manually processed or whether it had
9 been scanned.

10 **Q.** In respect of accounting figures that related to
11 deficiencies, for example, was that something
12 that -- discrepancies -- was that something that
13 you were involved in? We're going to go on to
14 talk about three cases that you had some
15 involvement in but, outside of those three
16 cases, was that something that you did have some
17 involvement in or not?

18 **A.** I can't recall.

19 **Q.** What did you understand to be the limitations on
20 obtaining that information from Fujitsu?

21 **A.** So I understood that the contract hadn't been
22 drawn up particularly well and there was a limit
23 on the amount of requests that could be made
24 without additional costs being incurred but, as
25 far as I'm aware, that was never ever

19

1 **Q.** I'm going to move on to your knowledge of the
2 Horizon system. I think you said you had
3 a day's training, was it, on Horizon?

4 **A.** We had a day's training.

5 **Q.** We've heard about ARQ data and you've addressed
6 it in your witness statement. How usual was it
7 to obtain audit data in the form of ARQ data
8 from Fujitsu?

9 **A.** It's actually quite difficult to answer because
10 I really can't recall. It was obtained but
11 I really can't recall now how many cases that
12 I had where it relied on the Horizon deficiency.
13 I think there were very, very few. As I said,
14 up until 2003, the cases in the main still
15 related to pension and allowances and, after
16 I started the case of *Page and Whitehouse*, I was
17 allocated very few POL cases.

18 **Q.** Are you able to assist us with whether it was
19 rare, occasional, frequent for you to request
20 ARQ data?

21 **A.** I think it was frequent. But in very few cases.
22 So ...

23 **Q.** So you didn't have many cases that required it
24 because I think you said they were not relating
25 to deficiencies in Horizon?

18

1 a consideration in whether such evidence should
2 be obtained.

3 **Q.** When you say it was never a consideration, do
4 you mean it was never your consideration or were
5 you aware of other people routinely requesting
6 that kind of information from Fujitsu?

7 **A.** Yes.

8 **Q.** Yes, you were aware of people routinely
9 requesting it from Fujitsu?

10 **A.** Yes, I was.

11 **Q.** I'd like to look at paragraph 43 of your witness
12 statement. It's page 17 of WITN08900100. You
13 say there:

14 "Where the integrity of the Horizon IT
15 system was being challenged the Investigator
16 would be asked to obtain any relevant
17 data/information from Fujitsu. At the time
18 I conducted POL cases I was unaware of any bugs
19 or defects in the system and believed that
20 Horizon was a robust and reliable system.
21 Dr Jenkins ..."

22 We're going to come on to talk about Gareth
23 Jenkins:

24 "... in his expert statement would have
25 asserted that and as an expert would have been

20

1 under a duty to disclose any information that
2 undermined that position."

3 So you've said there that, where the
4 integrity of the Horizon IT system was being
5 challenged, the Investigator could obtain the
6 relevant data from Fujitsu. Do you think it was
7 fair to put the burden on a defendant to
8 challenge the integrity of the Horizon IT
9 system, in order to trigger those --

10 **A.** Well, we probably know now, clearly not. At the
11 time, I genuinely believed -- and I don't think
12 anyone in my department were aware that this
13 wasn't effectively the perfect operating system.
14 I mean, my understanding was that the reason
15 why -- and I realise this is wrong now, but my
16 understanding was the reason why there was
17 a rollout was to ensure that (a) was a system
18 that subpostmasters could operate and, secondly,
19 that there weren't any accounting problems as
20 a result of it, in other words that it was
21 technically sound.

22 **Q.** Can we also look at a slightly later paragraph
23 in your witness statement. It's paragraph 56 on
24 page 20. You say there:

25 "I cannot recall what the contractual

21

1 **A.** I wouldn't be aware of that. I'd be surprised
2 but I wouldn't be aware of it.

3 **Q.** Thank you.

4 Moving on to the topic of bugs, errors and
5 defects. You've said in several places that you
6 were unaware that there were bugs, errors and
7 defects in Horizon. Were you aware of any
8 messaging to the contrary that there weren't
9 integrity concerns? You've talked about
10 an absence of knowledge of bugs, errors or
11 defects but were you aware of any messaging
12 quite the opposite: that Horizon is a robust
13 system and there are no integrity concerns.

14 **A.** Not that I can recall.

15 **Q.** When did you first learn about bugs, errors and
16 defects in Horizon?

17 **A.** From the papers.

18 **Q.** When you say -- newspapers?

19 **A.** Newspapers.

20 **Q.** When was that? Was that from the Group
21 Litigation, from the Court of Appeal or earlier,
22 *Computer Weekly*?

23 **A.** Earlier. Earlier.

24 **Q.** Can you give us --

25 **A.** I can't. I'm sorry.

23

1 requirements on Fujitsu were. I am aware that
2 there were limits on the number of ARQ requests
3 which could be made without additional costs
4 being occurred. I do not know how any requests
5 above the limits were dealt with or charged but
6 this would not have been a factor taken into
7 consideration in deciding whether such
8 documentation should be obtained."

9 Now, the Inquiry has heard evidence to the
10 contrary, in respect of a reluctance to seek ARQ
11 data because of cost implications. Can you
12 assist us with how it is you can be so
13 definitive on costs not being a factor that's
14 taken into account.

15 **A.** Well, it may simply have been that that it
16 wasn't raised in any cases that I dealt with but
17 I would be surprised. If it was something that
18 a lawyer asked for and thought was necessary,
19 then that would be the end of it. If it wasn't
20 obtained, then the case would be withdrawn.

21 **Q.** Do you see any distinction between the lawyers
22 and the Investigators in that respect?

23 **A.** Sorry, in what sense?

24 **Q.** Would you be aware if, for example,
25 Investigators were reluctant to obtain ARQ data?

22

1 **Q.** Did you see a Panorama programme?

2 **A.** I did see a Panorama programme, yes.

3 **Q.** At the time it came out on television?

4 **A.** At the time it came out.

5 **Q.** How about *Computer Weekly* in 2009?

6 **A.** I can't recall whether I read that at the time.
7 I certainly saw it or read about it afterwards
8 but I don't know whether I read it in 2009.

9 **Q.** Am I right in understanding that 2006 and the
10 Carl Page case was the final case that you were
11 involved in that related to the Horizon system?

12 **A.** Yes, it was.

13 **Q.** Thank you. I'm going to take you back to your
14 witness statement. It's paragraph 48 that I'd
15 like to look at now, and that's at page 18.

16 Thank you very much, page 18. You say:

17 "At no time that I dealt with [Post Office]

18 cases was I aware of any potentially relevant
19 known bugs, errors or defects in the Horizon IT
20 system. Had I known that any such bugs, errors
21 or defects existed then such an allegation in
22 a Defence Case Statement or Defence Statement
23 would clearly have triggered an obligation to
24 disclose such information."

25 I just want to look at a couple of words

24

1 that you've used in that paragraph. First of
2 all, "potentially relevant", are we to read
3 anything into your qualification there about
4 "potentially relevant known bugs, errors or
5 defects"?

6 **A.** No, and I have to say I don't think my response
7 was complete in this. I think, had I been aware
8 there were any potentially relevant known bugs,
9 errors or defects in the Horizon IT system, then
10 it's something that should have been looked at
11 before charges were brought. I don't think it
12 would have waited for a defence case statement,
13 because it would be clearly something that could
14 assist the defence.

15 **Q.** Thank you very much. That was going to be my
16 second question as to whether you really thought
17 that the defence statement was the correct
18 trigger for disclosure of that information.

19 Can we move on to paragraph 128 of your
20 witness statement. That is on page 37. You
21 come to some general conclusions or
22 recommendations in your statement. You say at
23 the bottom there:

24 "Had I been aware that there were bugs,
25 errors or defects of any faults in Horizon then
25

1 case if there were bugs in the system. I think,
2 as a member of a jury, if you were told that
3 there were bugs that affected say, northern
4 England offices but not southern England
5 offices, I think a question would arise in
6 anyone's mind as to whether they could be
7 certain that that was the case and that there
8 wasn't an unknown bug.

9 **Q.** Thank you very much, that can come down.

10 I'm going to move on to the topic of expert
11 evidence. The Inquiry has instructed its own
12 expert, Duncan Atkinson, King's Counsel.
13 I don't know if you saw his evidence --

14 **A.** I didn't, no.

15 **Q.** -- but I'm going to take you through some of his
16 evidence as to the rules relating to experts and
17 just see if you agree or disagree with his
18 conclusions in that respect.

19 Starting with instructing an expert, would
20 you agree that the prosecutor must provide
21 an expert with instructions as to the issue or
22 issues upon which his or her opinion is sought?

23 **A.** I do now. I didn't know that at the time. The
24 Investigators took all the statements. I think
25 I said in my statement that my understanding was

27

1 clearly a challenge to the integrity of Horizon
2 in one case would be relevant to other ongoing
3 or future cases. It is now clear that Horizon
4 was not the robust system it was held out to be.
5 In my view no proceedings should have been
6 started unless the Post Office were able to
7 prove that those bugs, defects or faults could
8 not have impacted on the operation of Horizon,
9 ie that the evidence being relied on was
10 reliable."

11 Are we to read that as essentially
12 a recommendation for the burden to be placed on
13 the Post Office to prove the reliability and the
14 accuracy of the figures that they are relying
15 on?

16 **A.** Well, it clearly was.

17 **Q.** Yes. What difference do you think that would
18 have made to the way you carried out your work
19 for the Post Office?

20 **A.** That's a difficult question to answer because
21 I was under the misapprehension, as it now turns
22 out, that Horizon was operating correctly.

23 **Q.** Yes.

24 **A.** I think it would have been very difficult in
25 a Horizon shortage case to actually prove the
26

26

1 that, at the very beginning of this,
2 Dr Jenkins -- I don't know whether he was
3 volunteered or put forward as a witness, but
4 advice was sought on what his evidence would
5 have to cover and what he would be able to do.

6 **Q.** We'll get to that. I'll just take you
7 through -- I'll try and do it as quickly as
8 possible -- all the various conclusions in
9 respect of expert witnesses. Would you agree
10 that a prosecutor must provide the expert with
11 issues or questions which the expert is expect
12 to address or answer?

13 **A.** The -- so, yes, but we didn't. We provided --
14 or the Investigator provided the evidence,
15 effectively.

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

21 **A.** Yes.

22 **Q.** Do you agree that, throughout the relevant
23 period of Horizon-based prosecutions -- that you
24 were involved in -- a prosecutor intending to
25 rely on expert evidence in criminal proceedings

28

1 was under a duty to, for example, satisfy
2 themselves as to the expert's relevant
3 qualifications and expertise?

4 **A.** Yes.

5 **Q.** And to satisfy themselves that the expert had
6 been appropriately instructed, including the
7 provision of written instructions?

8 **A.** Yes. As I said, I thought that there had been
9 a meeting where all of this had been gone
10 through. I didn't independently check that and
11 I should have.

12 **Q.** Perhaps, in that case, I'll really skip through
13 all of those conclusions because I think you're
14 very reflective on the situation and your
15 evidence is that, despite the fact that those
16 did apply, you relied on the Investigator to
17 satisfy themselves that the expert was
18 appropriately informed and appropriately
19 instructed?

20 **A.** Yes.

21 **Q.** Would you agree with Mr Atkinson and also Rob
22 Wilson to the effect that there was a lack of
23 internal guidelines in respect of the various
24 requirements that applied to the instruction of
25 experts?

29

1 recollection is that when Horizon was rolled out
2 the Head of the Criminal Law Team instructed
3 Counsel to advise on the expert evidence that
4 would be required and what the statement needed
5 to cover. I believe Fujitsu were then asked who
6 in their company would be able and willing to
7 provide that expert evidence. I do not know
8 what instructions were given. As far as
9 I recall only Dr Jenkins provided an expert
10 witness statement in cases I dealt with."

11 I think you would accept that those don't
12 reflect the requirements as outlined by
13 Mr Atkinson?

14 **A.** Absolutely.

15 **Q.** If we scroll down, paragraph 50, you say:

16 "I cannot recall any policies or guidance in
17 place regarding the provision of evidence by
18 employees of Fujitsu whilst I worked in the
19 Criminal Law Team."

20 At 51 you say:

21 "At the time I believed that Dr Jenkins was
22 the ultimate expert on Horizon. It did not
23 occur to me that there could be a potential
24 conflict of interest. I do not recall
25 a challenge ever being made by the court or the

31

1 **A.** Yes, I would.

2 **Q.** I'm just going to read paragraph 49 of your
3 witness statement, which addresses this, and
4 that's page 18, please. It's the bottom of
5 page 18. You say there:

6 "I do not know what information was provided
7 to experts instructed by the prosecution as to
8 their role, including, in particular, their duty
9 to the court and the meaning and importance of
10 the expert's declaration. The statements were
11 obtained by the investigators. Dr Jenkins' ..."

12 I think that's a reference to Gareth
13 Jenkins, is it?

14 **A.** Yes, it is.

15 **Q.** Did you know him as Dr Jenkins?

16 **A.** Yes, I believed he was Dr Gareth Jenkins.

17 **Q.** "... Dr Jenkins' statement included the words
18 'I understand that my role is to assist the
19 court rather than to represent the views of my
20 employers or Post Office Ltd.'"

21 Just pausing there, that quote, is that
22 taken from a particular document or is that just
23 your recollection?

24 **A.** I can't recall.

25 **Q.** "The words are self-explanatory. My

30

1 Defence regarding the use of Dr Jenkins as
2 an expert witness. His role was to provide
3 objective, unbiased opinion on matters within
4 his expertise to assist the court and not the
5 prosecution."

6 Knowing that he was an employee of Fujitsu,
7 the company that was responsible for building
8 and operating Horizon, did you see any conflict
9 of interest or potential conflict of interest in
10 Mr Jenkins acting in that role.

11 **A.** At the time, no, I didn't.

12 **Q.** And now?

13 **A.** Well, now, clearly I do because -- there was
14 clearly a conflict with Fujitsu generally
15 because, as far as I'm concerned, the fact that
16 there were bugs, et cetera, were hidden from us.

17 **Q.** If we could scroll down to paragraph 86, that's
18 page 30 and it's the bottom of page 30. You say
19 there:

20 "I believed that Dr Jenkins would have
21 disclosed any material which cast doubt on his
22 opinion."

23 Looking back -- and I haven't taken you
24 through the specific conclusions of
25 Mr Atkinson -- but would you agree that doesn't

32

1 really reflect the duties on the prosecution,
 2 effectively subcontracting the disclosure duties
 3 to --
 4 **A.** Yes, I do, yes.
 5 **Q.** Was that because Mr Jenkins was assumed to know
 6 his duties because he'd been involved in other
 7 cases or was it for some other reason?
 8 **A.** Yes, it was assumed that Dr Jenkins knew his
 9 duties, which is clearly wrong, and I accept
 10 that, and it was also believed that he
 11 effectively knew everything there was to know
 12 about Horizon. So, in other words, he would be
 13 aware of any issue.
 14 **Q.** You've mentioned Mr Jenkins a few times in your
 15 statement. We're going to come to the case of
 16 Carl Page where you mention him but, if we put
 17 that particular case to one side, do you recall
 18 specific cases where you were involved with
 19 Mr Jenkins?
 20 **A.** The first time I met -- it's Mr Jenkins, is it?
 21 **Q.** It is Mr Jenkins.
 22 **A.** Sorry. The first time I met Mr Jenkins was in
 23 the case of *Page and Whitehouse*, so I'd never
 24 had any dealings with him before, although
 25 I would assume that I would have seen witness

33

1 **A.** I wasn't directly involved in communications
 2 with Mr Jenkins. They were all done via the
 3 Investigator.
 4 **Q.** Thank you. Before we move on to the case
 5 studies, one other topic is identification
 6 codes. You've addressed those in your witness
 7 statement. You weren't aware of the ID codes
 8 document that we know as Appendix 6?
 9 **A.** No, I wasn't.
 10 **Q.** Are you aware that, in the event -- I think
 11 you've said in your witness statement that, in
 12 the event of a conviction, certain information
 13 was needed by the police that addressed
 14 ethnicity, for example; is that right?
 15 **A.** Yes, that's correct.
 16 **Q.** Are you able to assist us, were those what are
 17 referred to as NPA forms? Is that something you
 18 remember at all?
 19 **A.** Yes, I believe so.
 20 **Q.** They were required for police intelligence
 21 databases and also for notification of
 22 convictions; is that correct?
 23 **A.** That's correct.
 24 **Q.** Are you aware of the Post Office collecting race
 25 or ethnicity data for any other reasons other

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1 statements from him in previous cases.
 2 **Q.** When you say you assume you would have seen
 3 witness statements, is that because it was well
 4 known in the office that he provided those kinds
 5 of statements or was there some other source of
 6 that conclusion?
 7 **A.** Well, my understanding was he was the only
 8 person at that time who provided expert evidence
 9 on the operation of Horizon.
 10 **Q.** If we look at paragraph 43 of your statement,
 11 perhaps -- we don't need to bring it onto screen
 12 because it's a paragraph that we've already
 13 looked at -- but I think you said that
 14 "Dr Jenkins, in his expert witness statement,
 15 would have asserted that there weren't any bugs,
 16 errors or defects". When you say "would have
 17 asserted", was that something you recall? Was
 18 it speculation or was it something else?
 19 **A.** No, it would have been -- the purpose of his
 20 statement would have been to enable the
 21 prosecution to prove that Horizon was operating
 22 properly and, therefore, could be relied on.
 23 **Q.** Well, we'll talk about the Page case. Were you
 24 involved in any communications, other than in
 25 that case, with Mr Jenkins?

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1 than for the police?
 2 **A.** No.
 3 **Q.** Thank you. I'm going to move on, then, to the
 4 case of Carl Page. You're the first witness who
 5 is going to address this case so I'm going to
 6 have to read a little bit from the Court of
 7 Appeal's transcripts just to familiarise the
 8 chair and the Inquiry with the particular case.
 9 Can we look at POL00113278, please. This is the
 10 Court of Appeal judgment in *Hamilton, Josephine*
 11 *Hamilton v the Post Office*.
 12 Can we look at page 58, please. It's
 13 paragraph 277 onwards in the Court of Appeal.
 14 Thank you. So we have there "Carl Page" and the
 15 Court of Appeal says:
 16 "On 15 November 2006, in the Crown Court at
 17 Stafford, Carl Page pleaded guilty to theft."
 18 It says:
 19 "The indicted shortfall was £282,000. On
 20 19 January 2007, he was sentenced to 2 years'
 21 imprisonment following a basis of plea which
 22 accepted the theft of £94,000."
 23 Do you have a particular recollection of the
 24 ultimate accepted plea being significantly less
 25 than the indicted shortfall?

36

1 A. I was aware of that, yes.

2 Q. We'll probably come to it in due course but,
3 very briefly, can you assist us with why that
4 was accepted or why the figures are so
5 dramatically different?

6 A. I think my recollection is the basis of plea was
7 that he accepted that he had stolen £94,000 and
8 the remainder was either due to errors or theft
9 by other members of staff.

10 Q. Yes, and we'll come to that. That's also
11 mentioned in this judgment. It goes on,
12 paragraph 278:

13 "Mr Page and a co-defendant, John
14 Whitehouse, were jointly charged with conspiracy
15 to defraud and theft."

16 At a trial in the summer of 2005, they were
17 acquitted of conspiracy to defraud but they were
18 unable to reach a verdict on theft. Mr Page was
19 retried on his own for theft.

20 Can you assist us, were you involved in that
21 original trial?

22 A. I was, yes.

23 Q. "[The Post Office's] case at the first trial was
24 that Mr Page had colluded to steal money with
25 Mr Whitehouse, who was a customer. That case

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1 I think, really, my question from earlier is
2 the underpinning rationale for that reduced
3 figure isn't clear. We're going to hear from
4 counsel in that particular case but do you have
5 any recollection of the underpinning rationale
6 for the reduced figure?

7 A. I don't, no.

8 Q. "The Post Office relied on Horizon data to
9 evidence the missing £282,000. Two separate
10 defence expert reports noted that the
11 prosecution case was almost exclusively based on
12 the missing money in Horizon but the Post Office
13 argued it was also based on data from the Forde
14 Moneychanger (which is separate from Horizon)."

15 We're going to come briefly to look at those
16 defence expert reports. Paragraph 283, the
17 Court of Appeal says:

18 "The defence experts were critical of the
19 Post Office audit and the conclusions to be
20 drawn from it. One of the defence experts
21 expressed the opinion that the shortfall could
22 be attributable to unidentified errors in
23 Horizon, and noted the high incidence of errors
24 in the system. The expert disagreed with the
25 prosecution assertion that the shortfall

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1 was not maintained at the second trial at which
2 [the Post Office] alleged that Mr Page had
3 physically stolen £282,000 from the branch and
4 hidden the losses in the foreign exchange
5 system."

6 Then it refers to the defence statement for
7 his second trial. I'm going to take you to that
8 shortly. It says that:

9 "[He] denied that he had been dishonest
10 saying that the Post Office could not prove how
11 much money ought to have been in the accounts at
12 the beginning or end of the indicted period, or
13 when or how the money was taken.

14 "The amount of theft in the second trial was
15 reduced to £94,000 following an accepted basis
16 of plea."

17 This is, I think, what you were referring to
18 earlier. The basis of plea stated, as follows:

19 "The defendant stole £94,000 from the Post
20 Office having begun to do so on return from
21 holiday in August 2002. The remaining deficit
22 of £188,000 may have been the result of
23 incompetent accounting or possibly theft by
24 other person(s). The underpinning rationale for
25 that reduced figure is no longer clear."

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1 automatically amounted to theft without further
2 evidence."

3 It says there:

4 "There is nothing in the Post Office's case
5 papers to indicate that any ARQ data was
6 obtained at the time of the criminal
7 proceedings. There was no evidence to
8 corroborate the Horizon evidence. There was no
9 proof of an actual loss, as opposed to
10 Horizon-generated shortage. We also regard it
11 as unsatisfactory (to say the least) that
12 Mr Page was subjected to cross-examination in
13 the first trial on the basis which the [Post
14 Office] felt unable to sustain thereafter."

15 Then the Court of Appeal concludes that it
16 was not only unfair but they also conclude that
17 the prosecution was an affront to justice.

18 Thank you. That can come down, please.

19 Can we return to paragraph 65 of your
20 witness statement, please, that's page 25.
21 WITN08900100. Thank you, page 25. There's
22 a reference at paragraph 65 to the first trial,
23 and it says:

24 "Stephen John made the charging decision in
25 this case. Mr Page and Mr Whitehouse were

40

1 jointly charged with conspiracy to defraud and
 2 Mr Page was additionally charged with theft."
 3 We spoke earlier about who makes the
 4 charging decision. The suggestion in your
 5 statement there is that it is prosecuting
 6 counsel. Stephen John was prosecuting counsel,
 7 was he?
 8 **A.** Yes, he was.
 9 **Q.** Did you mean that Stephen John made the charging
 10 decision in the case?
 11 **A.** Well, Stephen John advised that there was
 12 sufficient evidence to afford a realistic
 13 prospect of conviction and that it was in the
 14 public interest to prosecute.
 15 **Q.** I think really my question is: was it sometimes
 16 unclear as to who ultimately made that charging
 17 decision?
 18 **A.** So my view, when we were -- when I was involved
 19 in this case, was that Stephen John made the
 20 decision to charge.
 21 **Q.** Was it sometimes effectively delegated from
 22 whoever was responsible at the non-legal level
 23 at the Post Office to, for example, counsel in
 24 the case?
 25 **A.** Yes.

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1 bottom of page 5, 2.6. The expert there says:
 2 "On the matter of the theft charge, a key
 3 question is whether Mr Page could have built up
 4 a significant 'AM' stock of euros of around
 5 456,000 euros which the prosecution allege that
 6 he stole. I have examined the evidence of the
 7 deliveries of euros to Rugeley Post Office
 8 throughout the indictment period and compared
 9 them to the payments by Mr Whitehouse for euros
 10 and a normal underlying level of euro sales, and
 11 the FM Command 10 printouts of all euro sales by
 12 Rugeley Post Office."

13 Just pausing there, it is a very complicated
 14 case and I don't expect you to recall all of the
 15 detail from this report. I'm going to ask you
 16 some very general questions about the report
 17 itself.

18 Paragraph 2.7:

19 "Both these analyses indicate that a surplus
 20 of euros of approximately 456,000 euros could
 21 not physically have been built up in the 'AM'
 22 stock or elsewhere. All the euros delivered to
 23 Rugeley Post Office were entered into FM and my
 24 analysis shows that sales of those euros match
 25 or exceed the deliveries. This contradicts the

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1 **Q.** I think you say at paragraph 67 you can't recall
 2 who authorised the prosecution of Mr Page?
 3 **A.** No, I can't.
 4 **Q.** Again, might it have been you or is this
 5 somebody who was not --
 6 **A.** No, no, I wouldn't have authorised the
 7 prosecution. It would have -- the papers would
 8 have gone to Case Worker, who would have
 9 forwarded them to the Authorisation Manager.
 10 **Q.** Thank you. I'm now going to go through, as
 11 briefly as I can, the three expert reports in
 12 this case, two from the first trial and one from
 13 the second trial. Can we begin with
 14 POL00045867, please. This is the expert report
 15 from the first trial, 16 May 2005. This was
 16 obtained by the defendant, Mr Page. Is that
 17 your recollection?
 18 **A.** Yes.
 19 **Q.** Yes?
 20 **A.** Yes.
 21 **Q.** Is this something you would have read at the
 22 time?
 23 **A.** Yes, I would have.
 24 **Q.** Can we please look at page 5. I'm just going to
 25 read a few paragraphs from this report, it's the

42

1 findings of Mr Manish Patel, which form the
 2 basis for the theft charge against Mr Page."

3 Pausing there, did you know Mr Manish Patel.

4 **A.** Yes, I did.

5 **Q.** Did you have any concerns about the work he
 6 carried out, in this case or more broadly?

7 **A.** No, no, I didn't, and the expert appears to have
 8 misunderstood the prosecution case. The
 9 prosecution case was precisely that: that these
 10 euros couldn't have built up in the AM stock or
 11 elsewhere because all the euros could be proved
 12 by the prosecution to have been sold, and that,
 13 effectively, the euros had been inflated in
 14 order to cover the shortage that was in the
 15 accounts.

16 **Q.** Thank you. So this report goes on to say:

17 "I have also considered the possibility that
 18 timing differences account for the alleged
 19 shortfall of AM stock that is set out in
 20 Mr Patel's schedule. I have identified the
 21 possibility that a delay between the date of
 22 sales of euros to Mr Whitehouse were entered on
 23 the FM and the date he physically [collated] the
 24 cash could explain the calculation of the
 25 alleged discrepancy."

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1 This is the final paragraph I'm going to
 2 read to you from this report. It says:
 3 "The prosecution have relied on evidence of
 4 a difference between the amount of foreign
 5 currency recorded on the Horizon system and the
 6 amount shown on FM in support of their assertion
 7 that a surplus of £282,000 of euros built up and
 8 was stolen by Mr Page from Rugeley Post Office.
 9 It is my contention, based on my analysis of the
 10 deliveries and sales of euros, that no such
 11 surplus of euros existed."

12 I'm now just going to take you to the second
 13 of the expert reports in the first trial.
 14 That's POL00045868. It's by the same expert,
 15 dated 17 June 2005, and it's page 8 that I'd
 16 like to go to, "Auditing methods used by Royal
 17 Mail". He says there:

18 "Reference is made throughout prosecution
 19 witness statements to audit work carried out at
 20 Rugeley sub post office by Royal Mail staff.

21 "I have serious reservations that the work
 22 carried out did not constitute an audit in the
 23 sense that data was not verified back to source
 24 documentation nor critically examined before
 25 conclusions were drawn.

45

1 out the Horizon, was it a snapshot that showed
 2 what should be present and then they would go
 3 through all the documentation and count the
 4 cash, et cetera.

5 **Q.** By the sound of it, this doesn't sound like
 6 a case where ARQ data, for example, was audited?

7 **A.** Sorry, can you say that again?

8 **Q.** By the sound of this expert report, it sounds as
 9 though something like ARQ data from Fujitsu
 10 wasn't obtained and audited because that would
 11 constitute more of a formal audit. Do you agree
 12 with that?

13 **A.** I agree. I can no longer recall whether ARQ
 14 data was obtained but I would accept that it
 15 wasn't, as there's no reference to it.

16 **Q.** If we look at 2.29, it says:

17 "I have seen no indication in the witness
 18 statements in this case that any audit or
 19 verification work was carried out on the
 20 balances at 8 January 2003. If that is the
 21 case, then the Royal Mail cannot be certain that
 22 those balances are correct and consequently
 23 cannot be certain of the amount of the overall
 24 'audit result'," et cetera.

25 I don't think I need to take you to much

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1 "I have carried out only a limited review of
 2 the audit schedules disposed to me but I have
 3 identified two serious shortcomings that
 4 indicate the work carried by Royal Mail was more
 5 akin to a stocktake than an audit. As such, the
 6 findings of that work cannot be relied upon to
 7 the same extent as if they were derived from
 8 audited figures."

9 Just pausing there, do you recognise the
 10 criticism that what the Post Office may have
 11 referred to as an audit was, in fact, more akin
 12 to a stocktake?

13 **A.** Yes, I would accept that. I think the witness
 14 statements made it clear that it was effectively
 15 a stocktake that was being done. I don't think
 16 there was any suggestion in any witness
 17 statement that it was anything other than that.

18 **Q.** But more broadly, looking at other cases and
 19 more broadly the conduct of the Post Office,
 20 what they called an audit wasn't what would
 21 generally be understood as an audit; do you
 22 agree with that?

23 **A.** I accept that but I don't think any witness
 24 statement would suggest it was anything other
 25 than effectively a stocktake. They would print

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1 more of this because, obviously, Mr Page was
 2 acquitted in relation to this trial and it's the
 3 second trial that I'll focus on.

4 **A.** Absolutely. Can I just say that because the
 5 judgment that we've just read -- unless I'm
 6 misinterpreting it, but it suggests, if I'm
 7 reading it right, that Mr Whitehouse was also
 8 charged with theft and there was a link between
 9 that and the foreign currency trial, if I can
 10 call it that. Mr Whitehouse was never charged
 11 with theft and they were two totally distinct
 12 set of facts.

13 **Q.** Yes, but the second matter wasn't proceeded with
 14 at the time of the first matter. The Post
 15 Office seems to have waited until he was
 16 acquitted of the first trial to then consider
 17 whether it proceeds with the second trial.

18 **A.** Sorry, I don't follow.

19 **Q.** Were the facts on which the second prosecution
 20 were based available to the Post Office at the
 21 time when the first trial took place?

22 **A.** I haven't seen the opening note in the second
 23 trial but my recollection is the facts that were
 24 put forward were the same, that the theft charge
 25 relied on the audit shortage, the £282,000 that

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1 couldn't physically have been in the foreign
2 currency, and that it had been hidden by
3 inflating the foreign currency on hand.

4 That had been the case in the first trial
5 and was the case in the second, although, in the
6 second trial, one of the key differences was
7 that we had found evidence to show that
8 an earlier audit, where I think there was
9 a shortage of something like £8,000, should
10 have, in fact, been over £100,000 because
11 a check that had been taken into account,
12 actually shouldn't have been.

13 **Q.** Let's look at the defence statement in that case
14 which clarifies some of the issues that were
15 between the parties. Can we look at
16 UKGI00012306. So this the defence statement
17 from the second trial, April 2006, and can we
18 turn to page 2. I'm going to read a couple of
19 paragraphs from that defence statement and I'll
20 begin at paragraph 2. The defence here say:

21 "The Crown asserts that Mr Page has stolen
22 £282,000 from the Post Office. Curiously the
23 Post Office cannot say when the money was
24 stolen, nor by what means, nor from what account
25 or fund within the sub post office. From

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1 error is made because of the way the system
2 works there is a serious danger of it being
3 carried forward forever. Although the
4 indictment period runs from 1 March 2002 the
5 Post Office does not know whether the opening
6 balances our correct and has no way of knowing
7 what the real as opposed to the [inputted]
8 figures are or should have been. It is
9 a significant feature of the case that in the
10 middle of the indictment period a Post Office
11 Audit Team went into Rugeley, closed the office
12 and audited the entire operation. They
13 concluded that the office was not well run but
14 did not find evidence of theft or fraud."

15 I'm going to now turn to that expert report
16 that is relied on. That can be found at
17 POL0006214, and this is an expert report that's
18 been obtained from KPMG: Mr Taylor, dated
19 7 April 2006.

20 Would you agree that there is, contained
21 within this expert report an attack on the
22 Horizon system?

23 **A.** Absolutely.

24 **Q.** If we could look at page 21, please. We'll just
25 have a look at those conclusions:

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1 January 1993 until July 2005, when Mr Page and
2 a Midlands' businessman Mr Whitehouse were
3 acquitted of conspiracy to defraud the Post
4 Office of £600,000, the Crown's case generally
5 was that the money had come from the foreign
6 exchange till. Having thought about it, and
7 having accepted the verdict of the jury, the
8 Post Office now suggest that a separate amount
9 which is nothing to do with the £600,000 has
10 been stolen by Mr Page from somewhere else in
11 the office but hidden by some means in the
12 foreign exchange account using the Post Office's
13 Horizon computer system. However for reasons
14 identified by Mr Timothy Taylor FCA in his
15 expert's report [and that's a report we're going
16 to come to] of April 2006 this is extremely
17 unlikely because of what the Post Office itself
18 found when it examined the accounts ..."

19 I'll just read paragraph 3. The defence
20 statement says:

21 "It appears to be the case that the entire
22 accounting system of the Post Office relies on
23 the accurate inputting of information by the
24 onsite staff who send the weekly returns off by
25 post to various centres. Thus once an input

50

1 "I note the following:

2 "I agree with Mr Patel that as from the week
3 ended 28 August 2002 the Horizon 'Foreign
4 Currency Sterling Equivalent' figure was
5 inflated, initially by £138,000 ...

6 "I agree with Mr Davies ... that, on the
7 basis of the accounting evidence available, the
8 shortage in the audit of 27 June 2002 should
9 have been increased [and it gives the amount]
10 ...

11 "The alleged deficiency of £282,000 in the
12 'AM' stock unit ... does not necessarily
13 indicate theft by Mr Page -- any such shortfall
14 could in practice be the result of other
15 unidentified errors or differences in Horizon.

16 "It is implicit in the Prosecution's case
17 that, by simply stating that the £282,000
18 shortfall ... equates to a theft of the same
19 amount, all other figures in Horizon (except for
20 the differences identified at the audit) were
21 correct. I have seen no evidence that is the
22 case and would also note the high incidence of
23 'errors' as set out in Section 5.7.

24 "The prosecution rely on the assumption that
25 the figures in Horizon are those record by

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1 Rugeley Post Office staff themselves and that
2 the Horizon system was working correctly
3 throughout the indictment period.

4 "It is now not possible to establish whether
5 the declared 'ONCH' figures were correctly
6 record in Horizon as they were not independently
7 checked at the time other than at the two
8 audits.

9 "If it is alleged that by the week ended
10 31 July 2002 ... the theft had reached £177,500,
11 and that it was being concealed by either
12 overstating the true foreign currency balance or
13 the 'ONCH' figure, then, in my opinion, there is
14 an unexplained inconsistency in the
15 Prosecution's case. This is because in the two
16 weeks [and gives the two weeks] the inflation
17 figures as stated by Mr Patel are nil and
18 recorded 'ONCH' figures were only [£79,000] and
19 [£91,000] respectively, and therefore they could
20 not be overstated by £177,500."

21 Looking back at this case, if you had known
22 that Horizon was not as you thought at the time,
23 would you have acted differently on receipt of
24 this report?

25 **A.** If -- so if I had known that Horizon could

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1 beginning of business", and gives the date.

2 Are you able to assist us with why it seems
3 as though ARQ data did not form part of any
4 analysis here and reliance is being placed on
5 office snapshots?

6 **A.** I'm sorry but I can't. I know we had a witness
7 statement from Mr Jenkins, which I haven't had
8 sight of, and whether he produces anything,
9 I don't know. But we clearly should have
10 obtained it and I would accept, from what's been
11 put here, that someone has looked at all the
12 unused material and that we didn't. And I would
13 have thought, had we, the expert would have
14 referred to it, as in the defence expert.

15 **Q.** Thank you. Just finally in relation to this
16 case study, you've mentioned Mr Jenkins, there's
17 mention of Mr Jenkins in your witness statement
18 in relation to this case. We don't have -- or
19 we haven't been able to obtain -- a report from
20 Mr Jenkins, a statement from Mr Jenkins, in
21 relation to this particular case. How confident
22 are you that he did feature in this case?

23 **A.** I'm 100 per cent sure.

24 **Q.** Can you assist us with your recollection of the
25 level of his involvement?

55

1 contain bugs, errors, defects, then it wouldn't
2 be a question of acting differently on receiving
3 this report; it would have been a case of
4 looking at the evidence differently at the
5 beginning of the first trial. Because, as
6 I said, the evidence was based on the Horizon
7 shortage at both trials. So it's horrendous
8 that we didn't and it's horrendous that Mr Page
9 faced a second trial on the same evidence, and
10 I can but apologise to him.

11 **Q.** Thank you. Can we just look back again at you
12 witness statement. I've very nearly finished
13 with this case study. Just returning to your
14 witness statement at paragraph 70 and it's
15 page 26. It says in the middle of that
16 paragraph:

17 "Glyn Burrows in his statement ... outlines
18 what he and his team did in conducting the
19 audit. He explained that he would request
20 an 'office snapshot' printout from Horizon which
21 provided a summary of all the cash and stock
22 which should have been present at the office at
23 the time, together with a summary of all
24 receipts and payments in relation to
25 transactions conducted at the office since the

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1 **A.** So I can't but I do recall him giving evidence
2 at court. It was the first time I'd actually
3 heard an expert witness give evidence on
4 Horizon, so I do recall it.

5 **Q.** Is there anything --

6 **A.** But I don't recall the content but it was a long
7 time ago.

8 **Q.** What was your understanding of his particular
9 role in those proceedings?

10 **A.** To prove that Horizon was operating correctly,
11 and that the figures could be relied on.

12 **MR BLAKE:** Thank you very much.

13 Sir, there are two other case studies that
14 this witness was to some extent involved in, but
15 very little. I don't have very much more to
16 ask, but we have plenty of time this morning.
17 Perhaps that is an appropriate time to take
18 a 15-minute break.

19 **SIR WYN WILLIAMS:** Well, we will do, but let me just
20 ask one or two more questions about Mr Page's
21 case, just to ensure that I understand fully
22 what Ms Stapel is saying to me.

23 So far as what happened procedurally,
24 Ms Stapel, can I -- is what I'm -- the question
25 I ask you is, have I got this right, all right?

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1 A. Okay.
 2 **SIR WYN WILLIAMS:** The first trial involved both
 3 Mr Whitehouse and Mr Page --
 4 A. Yes, it did.
 5 **SIR WYN WILLIAMS:** On Count 1 they were both charged
 6 with conspiracy but there was a second count,
 7 exclusive to Mr Page, and he was charged with
 8 theft.
 9 A. That's correct.
 10 **SIR WYN WILLIAMS:** So when we've been talking about
 11 a first and second trial, theft was always on
 12 the indictment in the first trial?
 13 A. It was, yes.
 14 **SIR WYN WILLIAMS:** My understanding is: both men
 15 were acquitted of Count 1, but the jury couldn't
 16 agree on the theft charge against Mr Page?
 17 A. That's correct, sir.
 18 **SIR WYN WILLIAMS:** That's how the second trial came
 19 to take place, not because they were separated:
 20 it was a retrial?
 21 A. Absolutely.
 22 **SIR WYN WILLIAMS:** Right. Fine. So going to
 23 Mr Jenkins' role, if, as you're asserting, he
 24 gave evidence, it must have been in the first
 25 trial because the retrial didn't take place?

1 (11.35 am)
 2 **MR BLAKE:** Thank you, sir. Can you see and hear me?
 3 **SIR WYN WILLIAMS:** Thank you, yes.
 4 **MR BLAKE:** Thank you.
 5 Just two very brief topics. Two case
 6 studies: the first, Mrs Adedayo; and the second
 7 is Ms Rudkin.
 8 Starting with Mrs Adedayo. We have heard
 9 about this case study from another witness so
 10 I'm not going to ask you very many questions at
 11 all about this case. She is in attendance
 12 today. I think you've said in your witness
 13 statement you have very little recollection of
 14 this particular case; is that correct?
 15 A. Absolutely.
 16 **Q.** The one document that I'm going to take you to
 17 is the charging advice and that's at
 18 POL00044361. So this is an advice, I think,
 19 from you on the sufficiency of evidence, and
 20 I think you advised on the sufficiency of
 21 evidence and made the charging decision or are
 22 we in this --
 23 A. Yes, I did.
 24 **Q.** Yes, thank you. Why was it sent to Ms Natasha
 25 Bernard?

1 A. No, absolutely.
 2 **SIR WYN WILLIAMS:** So if there is a witness
 3 statement and if Mr Jenkins gave evidence, it's
 4 the first trial that we need to focus on?
 5 A. Absolutely.
 6 **SIR WYN WILLIAMS:** But his role in the first trial
 7 would have been, as you said, to give evidence
 8 about the reliability of Horizon --
 9 A. *(The witness nodded)*
 10 **SIR WYN WILLIAMS:** -- and that related to Count 2,
 11 the allegation of theft against Mr Page; is that
 12 right?
 13 A. Indeed, sir.
 14 **SIR WYN WILLIAMS:** So it was directly relevant to
 15 whether or not Mr Page was guilty of theft?
 16 A. It was.
 17 **SIR WYN WILLIAMS:** Thanks. I've got all that clear.
 18 Thank you very much.
 19 We'll have our 15-minute break now.
 20 **MR BLAKE:** Thank you very much, sir. If we come
 21 back at 11.35.
 22 **SIR WYN WILLIAMS:** Fine, thank you.
 23 **MR BLAKE:** Thank you.
 24 (11.15 am)
 25 (A short break)

1 A. Sorry, can you repeat the question?
 2 **Q.** Can you assist us with the recipient?
 3 A. Oh, I see. I'm sorry, yes. So, basically,
 4 files would be submitted via the Casework
 5 Management Team to us and our response would
 6 always be to the Investigator.
 7 **Q.** Thank you. If we look down the page, it starts
 8 by saying:
 9 "In my opinion, the evidence is sufficient
 10 to afford a realistic prospect of conviction of
 11 the above named on the charges set out on the
 12 attached Schedule."
 13 The third paragraph says:
 14 "In view of the serious breach of trust
 15 involved in this case and the amount of money
 16 'borrowed' by the Defendant, this Offender
 17 should be prosecuted."
 18 We've spoken about the Code for Crown
 19 Prosecutors, we've spoken about the Full Code
 20 Test and the difference between the evidential
 21 test and the public interest test. Is there
 22 anything here that addresses the public interest
 23 aspect?
 24 A. No, simply that, obviously in addressing the
 25 public interest, you have to look at whether

1 there are factors -- sorry, whether factors
 2 against prosecution outweighed those in favour
 3 and, basically, in this case, there weren't. So
 4 I deemed it to be in the public interest because
 5 of the breach of the trust and the amount of
 6 money that had been borrowed.

7 **Q.** Is this typical of a charging decision relating
 8 to this kind of a case where you won't see, for
 9 example, a separate paragraph addressing public
 10 interest?

11 **A.** Yeah, this would be quite a typical advice.

12 **Q.** Thank you. Could we look at paragraph 109 of
 13 your witness statement, it's WITN08900100. It's
 14 page 35, paragraph 109. I'm just going to read
 15 part of that paragraph because, as I say,
 16 Mrs Adedayo is in attendance today. It says:

17 "I have considered the transcript of
 18 Mrs Adedayo's evidence to the Inquiry ... At the
 19 time I advised on evidence there would have been
 20 nothing in the papers to indicate that anything
 21 untoward had happened on the day of the audit
 22 and interview. I was not present on that day so
 23 do not know what occurred and it would therefore
 24 be inappropriate to comment save to say that on
 25 Mrs Adedayo's evidence her interview would have

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1 **MS DOBBIN:** Sorry, Ms Stapel. I don't know if you
 2 caught that. My name is Clare Dobbin and
 3 I represent Gareth Jenkins.

4 I just wanted to check some points with you,
 5 if I may. First, is this right: aside the three
 6 cases that you have been asked about in your
 7 witness statement, you can't recall any case
 8 that you had conduct of which depended on or
 9 relied upon a discrepancy in the Horizon system;
 10 is that correct?

11 **A.** I can't recall any individual case, no.

12 **Q.** Is this also right: that, after 2006, you did
 13 not, in fact, have conduct of any of those types
 14 of cases, with the exception of Mr Page's
 15 case --

16 **A.** That's correct.

17 **Q.** -- is that also correct?

18 I think it's right from what you've said
 19 today that, in fact, there was no case in which
 20 you instructed Mr Jenkins as an expert, save
 21 that you think he was instructed in the case of
 22 Mr Page; is that also right?

23 **A.** There was no case where he gave evidence in
 24 court. I can't recall whether he gave a witness
 25 statement in any other case I dealt with.

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1 been ruled inadmissible. Her account of the
 2 impact that the prosecution had on herself and
 3 her family are truly heartbreaking."

4 That's your evidence to the Inquiry in
 5 respect of this case.

6 **A.** That is my evidence. I mean, her account was
 7 truly heartbreaking and I hope the Post Office
 8 have now paid the compensation to her.

9 **Q.** Thank you. The final case study is Susan
 10 Rudkin. We're going to leave that for another
 11 witness because I don't think you had any direct
 12 involvement in the prosecution. I think you've
 13 said you just followed up afterwards on
 14 notifying the relevant --

15 **A.** Yeah, I just notified the result of one of the
 16 hearings but I wouldn't have read the file in
 17 order to do that. It would have simply been
 18 responding to a memo.

19 **MR BLAKE:** Thank you very much.

20 Sir, those are all of my questions. We do
 21 have questions from Ms Dobbin and Mr Stein. Can
 22 I propose that we take them in that order?

23 **SIR WYN WILLIAMS:** Yes, by all means.

24 **MR BLAKE:** Thank you.

Questioned by MS DOBBIN

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1 **Q.** Right. Well, let me see if I can explore that
 2 a bit further.

3 Can you in fact recall any other case at all
 4 by name, in which you obtained a witness
 5 statement from Mr Jenkins?

6 **A.** I can't recall, no.

7 **Q.** Can you recall anything about such a case?

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

9 **Q.** Can you recall even the geographical location of
 10 a post office or any sort of detail like that in
 11 such a case?

12 **A.** No, I can't.

13 **Q.** So is this right: you can recall absolutely
 14 nothing about any case in which Mr Jenkins was
 15 involved, besides the case of Mr Page; is that
 16 right?

17 **A.** Yes, if I had been asked to outline the facts of
 18 the case of *Page and Whitehouse*, without being
 19 given sight of these documents, I would have
 20 been unable to do so; it was a long time ago.

21 **Q.** I understand that but I'm asking you for any
 22 information whatsoever about any other case in
 23 which you were involved --

24 **A.** Yes, I cannot recall.

25 **Q.** -- that Mr Jenkins was involved?

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1 A. Yes, I cannot recall any other case where
 2 Mr Jenkins was involved.
 3 Q. When I refer to Mr Jenkins having been
 4 instructed by you in the case of Mr Page, again,
 5 as I understand your evidence, what you're
 6 saying is that, in fact, if he was instructed,
 7 it would have been by the Investigator rather
 8 than you; is that right?
 9 A. Absolutely. I had no direct contact with him.
 10 Q. In that regard, you had no concept whatsoever of
 11 the duties of a prosecutor in relation to
 12 an expert; is that right?
 13 A. I've already said, I failed in that duty, yes.
 14 Q. The question was whether or not that means you
 15 had no concept of the duties that a prosecutor
 16 bears towards an expert?
 17 A. No, because otherwise I would have sent the
 18 letter of engagement and -- yeah.
 19 Q. Given that those duties were enshrined in common
 20 law and that duties were also set out in the
 21 Criminal Procedure Rules from around 2006, can
 22 you assist the Inquiry as to why you didn't know
 23 you had such duties towards an expert witness?
 24 A. The 2006 rules would have been after I ceased
 25 doing the POL cases, and I don't know what the

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1 help, please, if we could bring that up.
 2 Do you have that in front of you, Ms Stapel?
 3 A. I haven't got paragraph 49. I can look it up in
 4 here, if you'd like.
 5 Q. Please, if you would.
 6 A. But it hasn't come up on my screen.
 7 Q. It's page 19 of your witness statement.
 8 A. Oh, it has now.
 9 Q. Just looking at the top of that page, Ms Stapel,
 10 you say, and this is the second sentence:
 11 "Dr Jenkins's statement included the words
 12 [and we can see that these are in inverted
 13 commas] 'I understand that my role is to assist
 14 the court rather than represent the views of my
 15 employers or Post Office Ltd'."
 16 So it does look as though you were quoting
 17 from a document. Can you assist me, please, as
 18 to what document you were quoting from?
 19 A. I can't, no, I'm afraid.
 20 Q. You signed this witness statement relatively
 21 recently.
 22 A. I did and I looked at a lot of documents.
 23 Q. Did you see any statement from Mr Jenkins as
 24 part of the --
 25 A. No, I didn't see any statement from Dr Jenkins.

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1 earlier rules said.
 2 Q. But does that mean, then, that you didn't keep
 3 abreast of developments in common law or --
 4 A. No, but I didn't --
 5 Q. -- criminal Procedure Rules?
 6 A. -- use an expert in any case after that.
 7 Q. Beforehand?
 8 A. Sorry, beforehand?
 9 Q. I'm just trying to understand whether or not you
 10 would have kept abreast of developments in the
 11 Criminal Procedure Rules or in the common law?
 12 A. Yes, we would have. So I can't explain why we
 13 dealt with experts wrongly.
 14 Q. You refer throughout your witness statement to
 15 Mr Jenkins as "Dr Jenkins". He's obviously not
 16 referred to that in any witness statement
 17 because he's not a doctor. Can you explain why
 18 you think he's called Dr Jenkins?
 19 A. No, I can't. As I think I said earlier, a copy
 20 of his witness statement wasn't in the bundles
 21 and I just thought he was called Dr Gareth
 22 Jenkins. I can't explain that. Clearly, I made
 23 a mistake.
 24 Q. Can I ask you, please, about paragraph 49 of
 25 your witness statement. I wonder if it would

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1 Q. Can I ask whether or not you have seen
 2 a document called the Clarke Advice?
 3 A. I have, yes.
 4 Q. Is it from the Clarke Advice that you're getting
 5 information --
 6 A. It --
 7 Q. -- like this?
 8 A. It may be.
 9 Q. That makes absolute sense, doesn't it,
 10 Ms Stapel?
 11 A. Sorry, what makes absolute sense?
 12 Q. It makes sense that this is where you're getting
 13 information about Mr Jenkins being referred to
 14 as "Dr Jenkins" and where you're getting
 15 information about what he said in his witness
 16 statements?
 17 A. It may be.
 18 Q. I'm going to turn, please, if I may to the case
 19 of Mr Page. Can you tell me, please, if you
 20 agree with me about this: in all of the material
 21 that's been provided to you by the Inquiry,
 22 you've seen no report by Mr Jenkins in that
 23 case?
 24 A. I haven't, no. I've only been provided with
 25 part of the evidence.

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- 1 Q. You've seen no witness statement from him?
 2 A. I haven't, no.
 3 Q. He's not mentioned in any opening note, is he,
 4 as featuring in the trial?
 5 A. I don't believe so.
 6 Q. He's not mentioned in the defence case statement
 7 as featuring in the trial or in the case, is he?
 8 A. I don't believe so.
 9 Q. He's not mentioned in any expert report, is he?
 10 A. I don't believe so.
 11 Q. He doesn't feature in the 109-page bundle of
 12 witness statements that were provided to you by
 13 the Inquiry at all, does he?
 14 A. No, but the witness statements that I've been
 15 provided with are incomplete.
 16 Q. Incomplete in that only Mr Jenkins' witness
 17 statement is missing from it?
 18 A. No, the bundles were vast. As I said, I can
 19 only remember that Mr Jenkins gave a witness
 20 statement because I can recall him being in
 21 court.
 22 Q. Well, can we turn to that, please. Please may
 23 I ask that the document POL00067102 is brought
 24 up. Can you see that Ms Stapel?
 25 A. I can, yes.

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- 1 on, you discussed with him the fact that you
 2 learnt about possible errors and defects in the
 3 Horizon system and you were discussing with
 4 Mr Blake the *Computer Weekly* magazine, yes?
 5 A. Yes.
 6 Q. He then said the *Computer Weekly* magazine
 7 article started around 2009. So would it have
 8 been around 2009 that you started to learn about
 9 these issues being discussed in the press?
 10 A. I believe so. I couldn't be certain of the date
 11 but I believe so.
 12 Q. Okay.
 13 Now, when we think back, Mrs Stapel, to your
 14 time at the Post Office, you left, unless I've
 15 got this wrong, in 2013?
 16 A. I did yes.
 17 Q. By the time you'd left in 2013, what was your
 18 role? What were your duties at that time?
 19 A. I was solely advising on Royal Mail cases. So
 20 cases dealing with postmen.
 21 Q. Right, okay. The issue, which is problems with
 22 the Horizon system, being brought to your
 23 attention in 2009 must have been of some
 24 interest to you; do you agree?
 25 A. I would agree.

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- 1 Q. Can you see that it is a letter from you?
 2 A. I can, yes.
 3 Q. Can you see it's a letter from you asking the
 4 defence to confirm all of the witnesses --
 5 A. I can, yes.
 6 Q. -- that they wanted to give evidence at the
 7 trial?
 8 A. I can, yes.
 9 Q. It's a long list of witnesses, isn't it?
 10 A. It is, yes.
 11 Q. Is Mr Jenkins' name on that list of witness
 12 statements?
 13 A. No, it's not.
 14 **MS DOBBIN:** No. Thank you, Ms Stapel. Those are my
 15 questions, sir. Thank you.
 16 **SIR WYN WILLIAMS:** Thank you, Ms Dobbin.
 17 Mr Stein?
 18 **Questioned by MR STEIN**
 19 **MR STEIN:** Is it Mrs Stapel or Ms Stapel?
 20 A. It's Mrs.
 21 Q. Mrs Stapel, my name is Sam Stein. I represent
 22 a large number of subpostmasters and mistresses.
 23 I've just got a few questions for you.
 24 Touching upon one matter that you spoke
 25 about today, when speaking to Mr Blake, earlier

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- 1 Q. Because you've come across today as being
 2 somewhat -- if I call it somewhat annoyed, you
 3 might put it slightly higher than that, that you
 4 weren't told that there were issues with the
 5 Horizon system; is that fair?
 6 A. That's fair.
 7 Q. How annoyed are you: between a bit, you know, of
 8 concern, right the way through to livid?
 9 A. I think it defies belief what happened. I think
 10 it's unbelievable that, even at the rollout
 11 stage, people were aware that there were
 12 technical issues and they were kept hidden.
 13 I just think it's outrageous, the suffering
 14 that's been caused by that.
 15 Q. From your point of view, as a lawyer working
 16 within the system, how do you feel about being
 17 denied this information?
 18 A. How do I feel? I feel that I thought I was
 19 advising fairly and competently, and I wasn't,
 20 in the POL cases, and I think it's quite
 21 devastating.
 22 Q. In terms of the team that you work within, who
 23 was your line manager or line managers?
 24 A. So to begin with, in -- when Horizon was rolled
 25 out?

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1 Q. Yes.
 2 A. So to begin with, it Mike Heath and after that
 3 it was Rob Wilson. Can I just say -- I mean it
 4 may be relevant or not -- but in terms of the
 5 line of questioning, that when I changed to
 6 doing cases involving postmen, I was working at
 7 home, so I only came into the office once or
 8 twice a fortnight. So I don't know what
 9 discussions were going on with the lawyers that
 10 we're dealing with POL cases during that period.
 11 I wasn't party to them.

12 Q. Right, well that does help, Mrs Stapel.
 13 My last question on that section was going
 14 to be that, once you learnt in the press around
 15 2009 that there were suggestions being made
 16 there, pretty clear suggestions, that there were
 17 problems with the Horizon system, who did you
 18 discuss that with?

19 A. Well, it was -- I discussed it certainly with
 20 Mr Wilson.

21 Q. What did he say?

22 A. He was of the view still that there were no
 23 problems with the integrity of Horizon.

24 Q. Can you help us a little bit more with that,
 25 because this is a *Computer Weekly* magazine.

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1 2010. We're not entirely certain which part.
 2 We think it's around August 2010. There are
 3 various reasons why we say that that we've
 4 looked at in relation to this document before.
 5 Now, can we just have a look, please, at the
 6 attendees of this particular meeting, okay.
 7 Attendees going down from the top, we've got
 8 Antonio Jamasb, Emma Langfield, Alan Simpson,
 9 Julia Marwood Ian Trundell and Andrew Winn. Did
 10 you know any of those?

11 A. Did I know any of those people? No, so Alan
 12 Simpson's name is familiar but I can no longer
 13 recall what part of Security he worked in. But
 14 none of the other names -- obviously
 15 I recognised Gareth Jenkins' name but none of
 16 the others.

17 Q. I was going to move down into the next section
 18 which are all Fujitsu individuals: Mike Stewart,
 19 John Simpkins, Gareth Jenkins and Mark Wright.
 20 Okay?

21 Now, you've been asked number of questions
 22 about Mr Jenkins. How frequently -- sorry,
 23 that's a bad question. Let's start it again.

24 Mrs Stapel, how often had you met
 25 Mr Jenkins?

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1 It's not -- forgive me for putting it this way,
 2 it's not *The Sun*. It's a magazine that's
 3 concerned with computers, setting itself out to
 4 explain that there was a problem with the
 5 Horizon system, referring to the Post Office.
 6 These are quite serious issues being raised
 7 against a public --

8 A. Absolutely.

9 Q. -- company like the Post Office. Did you say in
 10 your discussions with Mr Wilson that, you know,
 11 well --

12 A. I know that he held me -- or was involved in
 13 meetings with different people across the
 14 business but I'm not sure what the contents of
 15 those meetings were.

16 Q. Now, I'm going to refer you to a document that
 17 hopefully we've put forward to the Inquiry in
 18 terms of the questions I'm about to ask you, so
 19 hopefully you've had an opportunity to see it.
 20 The document reference is FUJ00081584.

21 Right, Mrs Stapel it's come up on your
 22 screen. You'll see at the top of this page that
 23 there's a reference to "Receipts/Payments
 24 Mismatch issue notes", okay?

25 Now, the date of this document is certainly

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1 A. I believe I met him for the first and only time
 2 at court, in the case of *Page and Whitehouse*.

3 Q. Right. In your dealings with him, in
 4 discussions with him about that case, did he
 5 ever say to you, "Look, you know, there are
 6 bugs, there are difficulties with the system"?
 7 Something like that? Just to indicate to you --

8 A. Absolutely not, and I don't believe I had any
 9 discussion with him.

10 Q. Shall we just roll back on that one, then. Did
 11 he indicate to you whether there were problems
 12 with the system? The answer is no. Did you ask
 13 him about any issues with the system?

14 A. No, that was the purpose of any witness
 15 statement to cover that.

16 Q. Right. Okay. Now, we're just going to have
 17 a look at this document. Can we go to the
 18 bottom of page 2, please. Then if we can
 19 highlight where it says "Impact", the five
 20 bullet points, that you can see.

21 Mrs Stapel, I hope you can see this document
 22 okay. This, essentially, is a document that is
 23 concerned with a bug within the system and this
 24 is the impact of the bug. So if we just go
 25 through that, I want to ask you then a couple of

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1 questions.

2 So the impact of the bug in the Horizon
3 system is that:

4 "The branch has appeared to have balanced,
5 whereas in fact they could have a loss or
6 a gain.

7 "Our accounting systems will be out of sync
8 with what is recorded at the branch

9 "If widely known could cause a loss of
10 confidence in the Horizon System by branches.

11 "Potential impact upon ongoing legal cases
12 where branches are disputing the integrity of
13 Horizon ...

14 "It could provide branches ammunition to
15 blame Horizon for future discrepancies."

16 Now, I've gone through that but it's quite
17 important information.

18 **A.** It's dynamite, yeah.

19 **Q.** Rather than me asking the obvious question: why
20 is it dynamite, in your view?

21 **A.** Firstly, clearly no one from Legal Services was
22 involved in this. I don't know whether they
23 found out about it afterwards, but it's just
24 extraordinary that any problem with Horizon will
25 be kept from any subpostmaster or any branch,

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1 told.

2 **Q.** I understand. And that, as you've confirmed
3 with me, that the question of bugs, errors or
4 defects was not shared: "Absolutely not", was
5 your words.

6 **A.** Absolutely not.

7 **Q.** All right. You also explained that, in relation
8 to a jury or a court, if hearing about these
9 problems, it would undermine such cases, yes?

10 **A.** Certainly if I was a juror and heard there were
11 bugs anywhere in the system, I'm not sure
12 I would convict on the basis of a Horizon
13 deficiency.

14 **Q.** Were you aware that it was possible to amend the
15 accounts in a branch, in other words remotely
16 amend?

17 **A.** Absolutely not, no.

18 **Q.** Did you learn at any stage later on, through any
19 of the news about it or perhaps reading the
20 judgments in the High Court, did you learn later
21 on that it was possible to amend the counter
22 branch's accounts?

23 **A.** I did read that but I'm not sure where, but that
24 was something that we were assured couldn't
25 happen.

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1 and the suggestion it might have a potential

2 impact on ongoing legal cases suggests that the
3 people who are involved in this knew that the
4 information should have been relayed both to the
5 Criminal Law Team and Civil, and it would look
6 as if this was being hidden.

7 But, clearly, the whole basis on which the
8 Post Office operated was that the accounting
9 system could be relied on. It's just
10 extraordinary and it makes one wonder how many
11 other meetings with similar problems took place
12 over how many years. But, I mean, this is
13 clearly something that should have been
14 disclosed to both the Criminal Law Team and,
15 indeed, the defence.

16 **Q.** Earlier in your evidence today, when you're
17 discussing matters with the first barrister that
18 asked you questions, Mr Blake, you were talking
19 about being told that the system was a "super
20 system".

21 **A.** I think those were my words. I was told that it
22 was -- yeah.

23 **Q.** Yeah. That was your interpretation of what was
24 being told?

25 **A.** That was my interpretation of what I was being

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1 **Q.** Who assured you it couldn't happen?

2 **A.** So, my understanding was that Mr Heath and
3 Mr Wilson indicated that that was kind of
4 something that was in stone, that no one would
5 be able to access a subpostmaster's accounts, or
6 rather the Horizon information in the accounts.

7 **Q.** Now, can we go to page 3 of this document,
8 please. You'll see there, Mrs Stapel, that
9 under the heading "Proposal for affected
10 Branches", if we can highlight that -- "Proposal
11 for affected Branches", very grateful -- and
12 then thereafter, you can see there's discussion
13 within this meeting:

14 "There are three potential solutions to
15 apply to the impacted branches, the group's
16 recommendation is in that solution two should be
17 progressed."

18 I'm just going to go through "Solution One"
19 with you because I want to ask you a couple of
20 questions about this issue of remote access:

21 "SOLUTION ONE -- Alter the Horizon Branch
22 figure at the counter to show the discrepancy.
23 Fujitsu would have to manually write an entry
24 value to the local branch account.

25 "IMPACT -- When the branch comes to complete

80

1 next Trading Period they would have
2 a discrepancy, which they would have to bring to
3 account.

4 "RISK -- this has significant data integrity
5 concerns and could lead to questions of
6 'tampering' for the branch system and could
7 generate questions around how the discrepancy
8 was caused. This solution could have moral
9 implications of Post Office changing branch data
10 without informing the branch."

11 Okay?

12 A. Yeah.

13 Q. Now, just reminding ourselves as we looked at in
14 relation to the attendees, we've got people from
15 the Post Office attending this meeting and
16 Fujitsu attending the meeting. So it's
17 a mixture of those two companies, if you like,
18 okay -- and reminding ourselves that the date
19 that this particular document is being
20 circulated is in 2010, okay? So what, three
21 years before you left the company?

22 A. But I was no longer doing that case -- this type
23 of work, then.

24 Q. You've reflected on the question of a jury
25 learning about bugs, errors and defects, and the

1 around this time, do you think this sort of
2 material should have been disclosed so that
3 matters such as that had to be considered?

4 A. Of course it should.

5 MR STEIN: Excuse me one moment, Mrs Stapel.

6 Thank you, Mrs Stapel.

7 Sir, no further questions.

8 SIR WYN WILLIAMS: Thank you, Mr Stein.

9 Are there any other questions from anyone?

10 MR BLAKE: No, sir.

11 SIR WYN WILLIAMS: Well, thank you very much for
12 coming to give evidence. Firstly -- well,
13 sequentially, thank you for making a detailed
14 witness statement in response to the questions
15 you were asked and thank you for coming to give
16 evidence today. I'm obliged to you.

17 So Mr Blake, we carry on tomorrow with
18 Mr Tatford; is that correct?

19 MR BLAKE: Yes, that's correct, sir.

20 SIR WYN WILLIAMS: Fine. 10.00 tomorrow morning,
21 then.

22 MR BLAKE: Thank you very much.

23 (12.08 pm)

24 (The hearing adjourned until 10.00 am
25 the following day)

1 like, and the fact that, if you were on a jury,
2 you wouldn't convict in such circumstances. The
3 situation whereby the accounts can be altered
4 remotely without branch accounts, what's your
5 concern, if any, about that?

6 A. Well, that clearly would also have a huge --
7 well, it would undermine the case for the
8 prosecution. I mean, this document is just
9 extraordinary. I mean, the only correct thing
10 to do would have been to inform all the branches
11 involved about the bug and deal with it that
12 way. So it's another sad example of how things
13 were concealed.

14 Q. In the criminal justice system, there's
15 a process that's used called abuse of process;
16 you're aware of that?

17 A. I am aware of that.

18 Q. I'm sure you'll recall -- I know you do other
19 work now -- but it's got two limbs to it, which
20 I loosely call -- that where something has
21 happened that's so bad that no case should be
22 prosecuted; and the second limb, whereby it's
23 unfair to prosecute a case. Okay?

24 A. Absolutely.

25 Q. In relation to prosecutions that were ongoing

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