

Wednesday, 22 November 2023

1
2 (10.00 am)
3 **MS PRICE:** Good morning, sir. Can you see and hear
4 us?
5 **SIR WYN WILLIAMS:** Yes, thank you very much.
6 **MS PRICE:** May we please call Mr Harbinson.
7 **GERALD OWEN HARBINSON (sworn)**
8 **Questioned by MS PRICE**
9 **MS PRICE:** Can you confirm your full name, please,
10 Mr Harbinson?
11 **A.** Gerald Owen Harbinson.
12 **Q.** You should have, in a bundle in front of you,
13 a hard copy of a witness statement in your name,
14 dated 17 October this year. Could you turn,
15 please, to page 67 of that statement. Do you
16 have a copy with a visible signature?
17 **A.** I do.
18 **Q.** Is that your signature?
19 **A.** It is.
20 **Q.** I understand there is a correction you wish to
21 make to paragraph 70 of this statement; is that
22 right?
23 **A.** That's correct.
24 **Q.** Would you like to tell us what that is?
25 **A.** There are two names there, Brian Sharkey and Ray

1

1 **A.** Yes, that's correct.
2 **Q.** You held this role until early 2005, when you
3 became a Compliance Manager --
4 **A.** That's right.
5 **Q.** -- before becoming a Financial Investigator
6 later in the same year?
7 **A.** That's correct.
8 **Q.** Did you remain in a financial investigation role
9 until you left the Post Office in 2010?
10 **A.** Yes, I did.
11 **Q.** You have provided some clarification in your
12 statement at paragraph 6 to the effect that the
13 word "Manager" in the job title of Investigation
14 Manager did not, in fact, mean that you held
15 a managing position; is that right?
16 **A.** That's correct.
17 **Q.** So you were an Investigator conducting
18 investigations, rather than a manager of those
19 conducting investigations?
20 **A.** That's correct.
21 **Q.** You say in your statement at paragraph 7 that
22 there was a big intake into the Security team at
23 around the time you were internally recruited in
24 the year 2000, with about 15 to 20 people being
25 recruited at that point?

3

1 Platt. That should read Ray Pratt, not Ray
2 Platt.
3 **Q.** With that correction made, are the contents of
4 the statement true to the best of your knowledge
5 and belief?
6 **A.** They are.
7 **Q.** For the purposes of the transcript, the
8 reference for the statement is WITN08150100.
9 Thank you for coming to the Inquiry to assist it
10 in its work and for providing the witness
11 statement that you have. As you know, I will be
12 asking questions on behalf of the Inquiry.
13 You worked for the Post Office for 12 years
14 from 1998 to April 2010, when you moved to Royal
15 Mail; is that right?
16 **A.** That's correct.
17 **Q.** Your first role was as a TV Enquiry Officer.
18 Can you explain please what this role involved?
19 **A.** That was going out on site to visit properties
20 that you were sent lists to, to visit to check
21 on the -- whether or not they were operating
22 a TV with or without a Licence.
23 **Q.** In the year 2000, you were internally recruited
24 into the Post Office Security Team as
25 an Investigation Manager; is that right?

2

1 **A.** That's correct.
2 **Q.** Were these people recruited internally, as you
3 were?
4 **A.** I genuinely don't know the answer to that but
5 I believe they were.
6 **Q.** Do you know why there was a recruitment drive at
7 this point in time?
8 **A.** I wasn't aware of the reason. I know it covered
9 both Post Office and Royal Mail.
10 **Q.** Did you have any experience in criminal
11 investigations or criminal law when you became
12 an Investigator for the Post Office?
13 **A.** No.
14 **Q.** You recall having training early on, which took
15 place over the course of a few weeks, and you
16 described this course at paragraph 61 of your
17 statement. Could we have that on screen,
18 please. It's page 24 of Mr Harbinson's
19 statement WITN08150100 -- thank you. Page 24,
20 a little further down at 61, please. You say
21 here:
22 "When I first joined the Security team as
23 an Investigation Manager, very early on I was
24 required to attend a formal training course at
25 a college in Milton Keynes, which was led by 2

4

1 or 3 senior members of the Security team.
 2 I recall that Mick Matthews was one of the
 3 trainers and I remember he was very thorough in
 4 his teaching. Whilst I cannot remember all the
 5 modules we were required to learn, I believe
 6 that they did cover the following -- the duties
 7 of investigators to conduct full and thorough
 8 investigations, taking witness statements in the
 9 course of an investigation, conducting
 10 interviews under caution, obtaining evidence in
 11 the course of an investigation, seeking evidence
 12 from third parties who might hold relevant
 13 evidence and drafting investigation reports and
 14 the legislation relevant to our role. In order
 15 to continue in the role of an Investigation
 16 Manager you had to pass an exam at the end of
 17 the course. I cannot remember the specific
 18 details of that exam, but I do recall passing
 19 it."

20 Is it right that this training was provided
 21 internally by Post Office Security team members,
 22 rather than being provided by external trainers?

23 **A.** That is correct.

24 **Q.** Did your initial training cover disclosure, as
 25 far as you can remember?

5

1 was Tony Utting, and there would be -- the team
 2 consisted of about half a dozen Investigators.
 3 That was the team I was in.

4 The Investigation Team, as a whole, would be
 5 team leaders around the country with the
 6 Investigators, and then there was the -- back to
 7 the investigation senior people, who run the
 8 investigation side of things.

9 **Q.** You say that when you started in the role you
 10 carried out investigations in relation to
 11 potential pension allowance fraud to help
 12 identify whether such fraud was committed
 13 internally at the Post Office or externally.

14 **A.** That is correct.

15 **Q.** You say at paragraph 12 you also investigated
 16 cases where there was a discovery of a cash
 17 shortfall at a Post Office branch following
 18 an audit?

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

20 **Q.** Where there was a discovery of an apparent cash
 21 shortfall at a Post Office branch, how did the
 22 Investigation Team become involved?

23 **A.** The -- that would come through from the Casework
 24 Management Team or the Audit Team and they would
 25 be told the branch that had the shortfall and

7

1 **A.** I can't remember that initial training, on that
 2 subject.

3 **Q.** You say at paragraph 10 of your statement that
 4 you also received training in the form of
 5 shadowing. How did that work?

6 **A.** When you first joined the team, you would not be
 7 allowed to lead an investigation; you would
 8 always be a second or third body to the
 9 investigation. You'd be shadowing and listening
 10 and watching and, back in the office, you would
 11 be taking instructions and listening to what the
 12 other investigators said about the roles that
 13 they were performing.

14 **Q.** Could you explain, please, the structure of your
 15 team when you first started as an Investigator,
 16 and how cases were allocated within the team?
 17 Do refer to your statement if you need to.

18 **A.** When you say the structure of the team, do you
 19 mean the Investigation Team or the team that
 20 I was in?

21 **Q.** The team that you were in, so you cover this at
 22 paragraph 11 of your statement. You say here
 23 you had team leaders.

24 **A.** Oh, right. Okay. I was in a team, I had a team
 25 leader, the team leader at that time, I think,

6

1 then the team leader will allocate the people
 2 that will go out to do the investigation.

3 **Q.** You address the process followed, once
 4 an investigation commenced in an apparent
 5 shortfall case, at paragraph 13 of your
 6 statement. If we could have that on screen,
 7 please. It's page 5 of Mr Harbinson's
 8 statement. You say this:

9 "When carrying out an investigation I would
 10 collate the necessary records and documents
 11 (such as reports that the Auditor had printed
 12 from the Horizon System on the day), take
 13 witness statements from relevant persons and
 14 conduct interviews under caution with the
 15 relevant persons (for example, the SPM)."

16 Taking this in stages, is it right that the
 17 Horizon data you were considering at this stage
 18 was that contained in the printout from the
 19 Horizon system, obtained from the counter in the
 20 branch?

21 **A.** That is correct.

22 **Q.** So you were simply looking at the record of what
 23 the Horizon system said should be held in
 24 a branch against the record of what the auditors
 25 actually found to be held in the branch?

8

1 A. That would be part of the records that would
 2 come off. The Audit Team could print off quite
 3 a few days or weeks of information from the
 4 system at that time so there'd be quite a roll
 5 of information. I'm not sure exactly how far --
 6 I can't remember how far they could go back but
 7 it would be quite an extensive roll of
 8 information that was printed off.
 9 Q. But it was -- they were reports which were
 10 printed off from the counter in the branch?
 11 A. That's correct.
 12 Q. Where an audit identified a discrepancy between
 13 the Horizon system reports and what was actually
 14 held at branch, how soon would you interview the
 15 subpostmaster or relevant member of staff?
 16 A. That would depend. That could happen almost
 17 immediately, it could be days later, depending
 18 on the circumstances of the information and
 19 who -- where the subpostmaster was or who else
 20 was in the office. It could be over a period of
 21 time but is often fairly early in the
 22 investigation.
 23 Q. You go on at paragraph 14 of your statement to
 24 say:
 25 "Following this [you] would write up
 9

1 yes.
 2 Q. Was it any part of your team leader's role, on
 3 receipt of the file, to review the evidence to
 4 determine whether further action should be taken
 5 in that case?
 6 A. I can't remember that part of it. I think they
 7 would give you advice prior to writing your
 8 report as part of the team. It's such a long
 9 time ago, I'm struggling to remember that.
 10 I would only be guessing now. I can't remember.
 11 Q. You say in your statement at paragraph 14 that
 12 your team leader would send the file to the
 13 Casework Management Team to check it from
 14 a procedural standpoint. What do you mean by
 15 "procedural standpoint" here?
 16 A. I think I'm talking about almost like the
 17 compliance, to make sure all the documents were
 18 there that were, you know -- if they were listed
 19 as items in the file, that they were actually in
 20 the file. Things -- everything was complete, it
 21 was going to the right place. It was like
 22 a check on it, really, I believe. I'd never
 23 worked in casework management so I'm not
 24 completely sure.
 25 Q. You also say in your statement at paragraph 14
 11

1 a report of findings and open a case file."
 2 The report you refer to here, is that the
 3 report which would go to the Criminal Law Team,
 4 the legal report produced by Investigators?
 5 A. That report would eventually arrive at -- with
 6 the Criminal Law Team, yes.
 7 Q. But the report of findings which you refer to
 8 here, that's referring to the legal report, is
 9 it?
 10 A. It is, yes.
 11 Q. Did you ever conduct further enquiries or seek
 12 further evidence after conducting interviews but
 13 before writing that report for the Criminal Law
 14 Team?
 15 A. I genuinely can't remember myself but it's
 16 something you would do, is -- if you didn't have
 17 all the information that you were going to
 18 submit in your report at that time, you might do
 19 further interviews with other people or
 20 subsequent interviews with the same person.
 21 That would depend on a case-by-case, but I can't
 22 recall.
 23 Q. Is it right that you would send the case file,
 24 once fully prepared, to your team leader?
 25 A. It would normally go through the team leader,
 10

1 that the report was then sent to the head of the
 2 Security team; is that right?
 3 A. I believe that's where it went, yes.
 4 Q. You refer to Phil Gerrish, Tony Utting, and John
 5 Scott having held the role of Head of Security
 6 at various points. Do you recall Tony Marsh at
 7 all?
 8 A. I know of Tony Marsh. I think he was always the
 9 senior person in both Royal Mail and Post Office
 10 at the same time. He was very senior. I don't
 11 recall him being in charge of the Investigation
 12 Team.
 13 Q. Do you recall him holding the role of Head of
 14 Security prior to John Scott?
 15 A. I thought the Head of Security prior to John
 16 Scott was Phil Gerrish, and Tony Marsh was
 17 senior to Phil Gerrish, so there was Post Office
 18 and Royal Mail. Phil Gerrish, Head of Post
 19 Office, and I thought Tony Marsh was head of
 20 both groups, Royal Mail and Post Office. But my
 21 memory is poor in that area, sorry.
 22 Q. Do you recall that there was a role entitled
 23 National Internal Crime and Investigations
 24 Manager when you were an Investigator?
 25 A. I don't remember that title, I'm sorry.
 12

1 **Q.** Do you think that might have been the role which
2 Mr Gerrish and Mr Utting held, rather than the
3 overarching Head of Security role?

4 **A.** I'd be guessing now. I can't remember.

5 **Q.** Could we have paragraph 15 of Mr Harbinson's
6 statement on screen, please. It's page 5. You
7 say here:

8 "Once the case file was with the Head of
9 Security team, it is my understanding they would
10 then liaise with the Case Management to get it
11 passed on to the Criminal Law Team in the POL.
12 I do not know if there were any specific factors
13 considered to determine whether to pass it on or
14 not, or whether all case files were passed on in
15 any event. Other than on an evidential basis
16 (which I deal with in paragraphs 18 and 19
17 below), I do not believe that I had any
18 involvement with liaising directly with any
19 other POL department during my role as
20 an Investigation Manager. I believe that any
21 other necessary cross-department liaison was
22 dealt with by colleagues in a more senior
23 position to me or with Casework Management."

24 As far as you can recall, did the Head of
25 Security review the evidence in a case before

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1 the Criminal Law Team or my team leader would
2 inform me and I'd carry out additional work to
3 obtain such evidence (for example, taking
4 an additional witness statement). Due to the
5 passage of time, I am unable recall any specific
6 examples of this occurring."

7 After a decision had been made to prosecute,
8 would it be fair to say that any further
9 enquiries or evidence gathering would be
10 reactive and done when required by the Criminal
11 Law Team?

12 **A.** I'm sorry, I didn't understand that.

13 **Q.** So after a decision has been made to
14 prosecute --

15 **A.** Yes.

16 **Q.** -- so you've done your legal report, it's gone
17 to the Criminal Law Team and a decision has been
18 made to prosecute the individual -- with
19 reference to this paragraph that we've just
20 looked at, were your further enquiries or
21 evidence gathering done when required by the
22 Criminal Law Team, rather than because you
23 decide you should do further enquiries or
24 evidence gathering?

25 **A.** It would be on instruction, if I'd been required

15

1 the case was transferred to the Criminal Law
2 Team to determine whether further action should
3 be taken in the case?

4 **A.** I don't know. I don't know what the Head of
5 Security did with the documents or what
6 evaluation he made of them.

7 **Q.** In terms of the decision on whether someone
8 should be prosecuted, you say at paragraph 16 of
9 your statement that you believe it was always
10 the decision of the Criminal Law Team whether to
11 pursue a criminal prosecution or not and you do
12 not recall that decision ever being made by
13 anyone in the Security team. Do you recall the
14 title of Designated Prosecution Authority from
15 the time you were an Investigator?

16 **A.** I don't recall that position. No, I don't
17 remember it clearly.

18 **Q.** Could we turn, please -- scroll down, please --
19 to paragraph 18 of your statement. You say
20 here:

21 "In the event that an incident I had
22 investigated was being prosecuted, I would
23 continue to assist the Criminal Law Team on
24 an evidential basis. For example, if the
25 Criminal Law Team required additional evidence,

14

1 to do something. That would come, I believe,
2 from the Criminal Law Team.

3 **Q.** Were you ever involved in investigating a case
4 which went to trial in the Crown Court or in any
5 other case in which external solicitors or
6 counsel were instructed to prosecute.

7 **A.** Do you mean at the court, attending the court?

8 **Q.** Any case where your investigation led to
9 criminal proceedings in which external
10 solicitors and counsel were involved?

11 **A.** I think the solicitors always came from our
12 Criminal Law Team. In the court itself, the
13 barristers were from other chambers, I think
14 it's called, but everything came from our own
15 Criminal Law Team, I believe.

16 **Q.** So you don't recall receiving requests, even if
17 those came via the Criminal Law Team, to conduct
18 further investigations, requests coming from
19 prosecuting counsel or an external prosecuting
20 agent?

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

22 **Q.** Were you ever asked to obtain further
23 information as a result of a disclosure request
24 or an assertion contained within a defendant's
25 defence case statement?

16

1 A. I can't recall.
 2 Q. You say at paragraph 19 of your statement that
 3 you had to assist the Criminal Law Team with
 4 meeting any disclosure obligations, which you
 5 say involved compiling a list of all used and
 6 unused evidence in the investigation and
 7 collaborating those documents into a bundle.
 8 Would that bundle then be provided to the
 9 Criminal Law Team?
 10 A. It would, yes.
 11 Q. Did you understand, when you were
 12 an Investigator assisting the Criminal Law Team
 13 with disclosure, that you were acting as the
 14 Disclosure Officer in the case?
 15 A. Yes.
 16 Q. At the time, did you understand that this was
 17 a distinct role, over and above your role as
 18 an Investigator, which imposed on you additional
 19 and distinct duties?
 20 A. It was invariably the role of the Investigator
 21 that did the -- produced the disclosure list
 22 and -- as part of the committal bundle. But
 23 the -- I knew about disclosure, that everything
 24 you obtained had to be disclosed as used or
 25 unused, but I was aware that we had to produce

17

1 Q. Were key pieces of legislation which governed
 2 the conduct of investigations and disclosure
 3 provided to investigators, as far as you can
 4 recall?
 5 A. I genuinely can't remember.
 6 Q. Can you recall ever accessing such legislation
 7 when you were an Investigator?
 8 A. It would be easy for me to say yes but I can't
 9 remember.
 10 Q. What about key policy documents governing the
 11 conduct of investigations and disclosure; were
 12 these provided to Investigators, as far as you
 13 can recall?
 14 A. I don't recall.
 15 Q. Could we have on screen, please, document
 16 reference POL00064235. This is a Disclosure
 17 Officer's report. Is this one of the forms you
 18 recall completing when you were an Investigator?
 19 You can scroll down a little, please, so we can
 20 see the full page. Don't worry about the
 21 specific details on the form at the moment.
 22 A. No. It looks familiar, yes.
 23 Q. Scrolling back up, please, we can see, beneath
 24 the case name:

"The following items are listed on the

19

1 those lists and those documents, and supply them
 2 to the Criminal Law Team.
 3 Q. Who would you have gone to if you were in any
 4 doubt about whether there was an obligation to
 5 disclose material?
 6 A. Back then, I think the first port of call would
 7 have been to my team leader but certainly
 8 I would've seen it progressed from there but,
 9 initially, certainly the team leader.
 10 Q. Do you recall being aware that, when you were
 11 acting as a Disclosure Officer, you had
 12 obligations under the Criminal Procedure and
 13 Investigations Act?
 14 A. I believe I did.
 15 Q. Do you recall being aware, when you were acting
 16 as a Disclosure Officer, that you had
 17 obligations under the Criminal Procedure and
 18 Investigations Act Code of Practice?
 19 A. Such a long time ago -- I believe that that was
 20 the role, yes.
 21 Q. The same question in relation to the Attorney
 22 General's Guidelines on disclosure?
 23 A. I don't remember that particular line that
 24 you've spoken there. It's not something that
 25 comes back to me -- to mind.

18

1 schedule(s) for this case and may undermine the
 2 prosecution case (primary disclosure)/assist the
 3 defence (secondary disclosure)/or are required
 4 to be supplied under Section 7.3 of the Code
 5 (delete as applicable)."
 6 So this form requires the Disclosure Officer
 7 to identify any unused material which may
 8 undermine the prosecution case or assist the
 9 defence; is that right?
 10 A. Yes.
 11 Q. Was that the question which you applied to the
 12 unused evidence gathered during the
 13 investigation when you completed disclosure
 14 forms to assist the Criminal Law Team, or do you
 15 not remember applying your mind to that?
 16 A. I don't remember that, no. No.
 17 Q. Who made the final decision on whether material
 18 should be disclosed in any given case?
 19 A. That would be the Criminal Law Team.
 20 Q. Would you agree that it was important for the
 21 Criminal Law Team to be aware of the existence
 22 of all material which might undermine the
 23 prosecution case or assist the defence?
 24 A. Yes.

25 Q. Did you understand the importance, therefore, of

20

1 the job you were doing when completing the
2 disclosure schedules?

3 **A.** Yes, I believe we did.

4 **Q.** Were you aware, when you were an Investigator,
5 that there was an obligation on a criminal
6 Investigator to pursue lines of inquiry which
7 pointed away from the guilt of the suspect?

8 **A.** Yes.

9 **Q.** In an apparent shortfall case, did you
10 understand it to be any part of your role to
11 make enquiries into the reliability of the core
12 evidence being relied upon, to evidence, for
13 example, theft?

14 **A.** Sorry, I didn't understand that.

15 **Q.** When you were an Investigator and you were
16 investigating an apparent shortfall case, did
17 you understand it to be any part of your role to
18 enquire into the reliability of the evidence you
19 were relying upon to demonstrate, for example,
20 theft?

21 **A.** Oh, I see.

22 **Q.** So, specifically speaking, Horizon reports?

23 **A.** I'm not sure that it's a piece of information
24 that I could have obtained but I'm aware that
25 on -- where Horizon data was used in evidence,

21

1 make enquiries relating in particular to the
2 operation, reliability and accuracy of Horizon
3 data?

4 **A.** I can't remember doing that no.

5 **Q.** Was there a checklist of steps to take or any
6 other guidance to ensure all relevant
7 information was identified, collected and sent
8 to the Criminal Law Team in proceedings brought
9 by the Post Office against subpostmasters?

10 **A.** I don't recall a checklist.

11 **Q.** When you first became an Investigator, were you
12 aware of the rollout of the Horizon system?

13 **A.** Sorry?

14 **Q.** When you first became an Investigator, and that
15 was in 2000, and in the early point of being
16 an Investigator, were you aware of the rollout
17 of the Horizon system, its introduction?

18 **A.** I knew it was a new system that had come in,
19 yes.

20 **Q.** Did you have any awareness of there being bugs,
21 errors and defects or any Acceptance Incidents
22 during the rollout of the Horizon system?

23 **A.** Not that I recall, no.

24 **Q.** Were you given any training on the Horizon
25 system at any stage?

23

1 I believe there was a witness statement from
2 Fujitsu to say that the system was working
3 correctly at the time, at the material time.

4 But I'm not sure how, as an Investigator,
5 I would have checked the reliability of the
6 system. But I understood that was part of -- it
7 became part of the investigation, yes.

8 **Q.** We'll come on to evidence from Fujitsu shortly
9 but, staying with what you understood your role
10 to be in terms of enquiries when you were
11 conducting your investigation, in an apparent
12 shortfall case, where an essential element of
13 an offence to which an investigation related was
14 dishonesty, did you, as a matter of course, make
15 financial enquiries relating to the suspect as
16 part of your investigation?

17 **A.** Would I or did I?

18 **Q.** Did you?

19 **A.** I can't remember cases back then but, part of
20 it -- no, I can't remember cases back that
21 far -- you would have looked at the financial
22 position of people, yes.

23 **Q.** In an apparent shortfall case, where a suspect
24 was saying that they did not understand where
25 an apparent shortfall had come from, did you

22

1 **A.** I seem to recall some training on how to obtain
2 data off the system, how to produce the data.
3 But, genuinely, that was usually done by the
4 Audit Team.

5 **Q.** By obtaining data, do you mean printing off the
6 reports --

7 **A.** Yes.

8 **Q.** -- from the counter in the branch?

9 **A.** Yes.

10 **Q.** Could we have on screen, please, paragraph 64 of
11 Mr Harbinson's statement, that's page 25 of
12 WITN08150100 --

13 Page 25. At paragraph 64, you say this:

14 "In relation to training about obtaining
15 information from third parties, particularly
16 Fujitsu, I do recall receiving training on the
17 processes to follow, however, I cannot recall
18 when and how this training was delivered.
19 I deal further with such processes under the
20 subheading 'Analysing Horizon data and
21 requesting ARQ data from Fujitsu' below."

22 Can you recall how long this training
23 lasted, the training on obtaining information
24 from third parties?

25 **A.** From the Fujitsu training?

24

1 Q. You've referred here to receiving training about
2 obtaining information from third parties,
3 particularly Fujitsu, and being trained on the
4 processes. You say you can't recall when and
5 how the training was delivered, but can you
6 recall how long the training lasted?

7 A. No.

8 Q. Can you remember who delivered it?

9 A. I don't remember clearly. It might have been by
10 the Audit -- some of the Auditors, I don't
11 recall. But I think it might have been by the
12 Audit Team.

13 Q. So when you refer to obtaining information from
14 third parties, are you referring here, again, to
15 the printing out of data from the counters in
16 branches or something different?

17 A. I think that's what I refer to, yes.

18 Q. Did anyone tell you that there was a duty on you
19 as an Investigator to obtain and consider
20 third-party material from, for example,
21 financial institutions and Fujitsu in
22 appropriate cases?

23 A. I believe that would have been part of it, the
24 training, yes, and understanding that. The
25 Fujitsu -- you could obtain further Fujitsu

25

1 general terms, did you consider those to be
2 sufficient evidence of a loss, alone?

3 A. Yes, they were evidence -- I would consider them
4 evidence of the loss. But depending on -- if it
5 was me investigating, depending on what the --
6 came up on interviews, you might need to go back
7 further to establish and to look at further
8 documents, and go to the casework and obtain
9 further data.

10 Q. What guidance was given to Investigators to
11 assist them in obtaining Horizon data from
12 Fujitsu?

13 A. I don't know what guidance was given.

14 Q. Well, do you recall there being any, apart from
15 being aware you could request data?

16 A. Yeah, I knew you could -- that further data
17 could be requested. I'm not sure you -- what
18 guidance there was on that.

19 Q. What further data or audit reports did you
20 understand could be produced by Fujitsu over and
21 above the printouts?

22 A. I genuinely don't remember.

23 Q. Were you ever made aware that an enhanced
24 interrogation of the audit trail could show when
25 a transaction or event had been performed by the

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1 data. There was the ability to do that.

2 Q. You deal with the process by which Horizon data
3 was obtained at paragraph 75 of your statement.
4 Could we turn to that, please. It's page 31.
5 You say here at paragraph 75:

6 "I can comment on how Horizon data was
7 obtained and analysed in more general terms
8 where a cash shortage was discovered during
9 an audit. The relevant Horizon printouts were
10 obtained by the Auditor on the day at the
11 branch. If anything further was required during
12 an investigation, for example, printouts from
13 an earlier period to determine at which point
14 the accounts no longer balanced, then you could
15 receive this information directly from Fujitsu.
16 An Investigation Manager could simply ask the
17 Casework Management Team to make this request to
18 Fujitsu."

19 In general terms, did you consider that the
20 Horizon printouts obtained by an Auditor -- the
21 counter printed reports -- were sufficient
22 evidence of a loss?

23 A. Sorry the last bit?

24 Q. Were sufficient evidence of a loss? So the
25 printouts that were obtained by the Auditor, in

26

1 system?

2 A. I'm not aware of that.

3 Q. Who was responsible for deciding whether to
4 retrieve Horizon data from Fujitsu?

5 A. I think initially would be the Investigator.
6 But, further, that might come from -- the
7 Criminal Law Team might advise you to get
8 further data but, on a case-by-case, I don't
9 know.

10 Q. Were there ever circumstances in which you would
11 request more detailed audit data from Fujitsu
12 before you interviewed a subpostmaster or
13 a member of their staff?

14 A. I don't recall that happening.

15 Q. Was that step ever taken before a decision was
16 made to prosecute?

17 A. I don't recall.

18 Q. Were you aware that there was a quota placed on
19 audit request queries made of Fujitsu?

20 A. No.

21 Q. At paragraph 75 that we've just looked at, you
22 describe processes for obtaining Horizon data in
23 the context of cases where a cash shortage was
24 discovered during an audit. But you say at
25 paragraph 74 of your statement that you do not

28

1 ever recall a situation where a cash shortfall
 2 that you were investigating was attributed to
 3 problems with Horizon by anyone subject to the
 4 investigation. By that, do you mean that you
 5 cannot recall anyone saying the shortfall is
 6 caused by problems with the system?
 7 **A.** I don't recall that, no.
 8 **Q.** When you were an Investigator, were you aware of
 9 any other Investigators having investigations
 10 where a shortfall was attributed to problems
 11 with Horizon?
 12 **A.** I don't recall.
 13 **Q.** Did you ever have an apparent shortfall case
 14 where someone was saying they simply couldn't
 15 explain how an apparent shortfall had occurred?
 16 **A.** No, not that I -- I don't recall that, no.
 17 **Q.** Were you ever aware that there were bugs, errors
 18 or defects in the Horizon system, which had the
 19 potential to cause discrepancies in branch
 20 accounts?
 21 **A.** Certainly not, no.
 22 **Q.** Would you agree that it was critical for
 23 Investigation Managers and those overseeing
 24 investigations to be informed of any ongoing
 25 technical issues with the Horizon system?

29

1 **Q.** When you used the term "expert", are you
 2 referring to the status of an expert witness
 3 statement in legal proceedings or do you mean
 4 that they had expertise in the system?
 5 **A.** I thought it was because they were an expert --
 6 they were producing a witness statement, or in
 7 person, as an expert on the system and the
 8 reliability of the system, at that particular
 9 time.
 10 **Q.** Would such a statement usually simply produce
 11 audit data or Horizon helpline call logs or
 12 would they include specific analysis of the data
 13 or call logs in that specific case, as far as
 14 you can recall?
 15 **A.** I don't recall the specifics of their statement.
 16 **Q.** Turning please to the Compliance Manager role
 17 you held in 2005, you say in your statement that
 18 you were internally promoted to this role in
 19 early 2005; is that right?
 20 **A.** That's correct.
 21 **Q.** Who did you report to in this role?
 22 **A.** David Pardoe.
 23 **Q.** What did your role entail?
 24 **A.** To start with, I was uncertain about what it was
 25 that I was doing, but it was really panned out

31

1 **A.** Yes.
 2 **Q.** You refer at paragraph 76 of your statement to
 3 believing it to have been common to have
 4 a Fujitsu manager as an expert witness in
 5 criminal proceedings relating to cash shortages,
 6 to provide their own analyses on the data and to
 7 determine whether Horizon was operating
 8 properly. What is the basis for that belief?
 9 **A.** I believe that they were a witness at any trial,
 10 if not in attendance but, certainly, part of the
 11 committal bundle would contain a witness
 12 statement. That's what I always thought and
 13 always believed occurred because it was
 14 a question of the reliability of the evidence
 15 that you were producing.
 16 **Q.** Do you recall when a Fujitsu manager was engaged
 17 in this way: before or after a charging
 18 decision?
 19 **A.** I don't know.
 20 **Q.** Do you recall the name of any Fujitsu manager
 21 engaged in that way?
 22 **A.** No.
 23 **Q.** Were you ever involved in providing instructions
 24 to any Fujitsu manager engaged in this way?
 25 **A.** No.

30

1 as the compliance of -- of the case file, the
 2 construction and times of case files, to try to
 3 raise the standard of the file itself.
 4 **Q.** Can you recall now the type of forms you would
 5 have expected to see an Investigator completing?
 6 **A.** Sorry?
 7 **Q.** Can you recall now the type of forms you would
 8 have expected to see an Investigator completing,
 9 in 2005?
 10 **A.** Some of them, yes, but for me, it was about the
 11 file itself, the green file with the -- how
 12 everything was meant to be laid out in it, with
 13 the different documents, different appendices,
 14 that type of thing.
 15 **Q.** As a Compliance Manager, did the issue of the
 16 accuracy of Horizon ever arise?
 17 **A.** No.
 18 **Q.** In the short time that you held this role, did
 19 you come across the Identification Codes
 20 document that you address at paragraph 73 of
 21 your statement?
 22 **A.** I knew there was identification codes but
 23 I don't recall that document.
 24 **Q.** You say in paragraph 73 of your statement that
 25 you do recall Investigation Managers being

32

1 instructed to assign identification codes to
 2 suspected offenders. Does it remain the case
 3 that you cannot recall the reasoning behind
 4 that?
 5 **A.** It's true, yes.
 6 **Q.** You say at paragraph 73 -- and if we can just go
 7 back a page, please -- that you cannot remember
 8 seeing this document. Is that at any point that
 9 you were employed by the Post Office?
 10 **A.** I don't remember seeing that document.
 11 **Q.** Is that why you say you cannot recall what your
 12 view at the time was of the appropriateness of
 13 the codes described?
 14 **A.** I don't -- I didn't see that document, I don't
 15 believe. I don't recall that, no, or its
 16 appropriateness.
 17 **Q.** Moving, please, to your role as a Financial
 18 Investigator. You say at paragraph 22 of your
 19 statement that you and Mick Matthews were both
 20 put forward for a new role for the Security
 21 team, that of Financial Investigator, by David
 22 Pardoe; is that right?
 23 **A.** Correct.
 24 **Q.** This would have been late 2005, you think?
 25 **A.** That's correct.

33

1 far as I am aware, the Financial Investigation
 2 Unit within POL were one of the first non-police
 3 bodies who applied to exercise powers of
 4 recovery under POCA. The ARA took the lead in
 5 delivering the relevant training to myself and
 6 Mick Matthews in order for us to become
 7 Accredited Financial Investigators. In doing
 8 so, they provided us with a mentor, Elaine
 9 Blewitt, who was an experienced Accredited
 10 Financial Investigator in the police.
 11 Initially, we received mentoring from Elaine
 12 Blewitt and carried out our work under her
 13 supervision and accreditation. This continued
 14 until we passing the necessary exams in place to
 15 become accredited ourselves. I cannot recall
 16 what the specific exams were, but I remember
 17 them being very difficult and requiring a lot of
 18 preparation and application of the knowledge we
 19 had gained from our mentoring and experience so
 20 far. I was qualified in POCA parts 2, 4 and 8."
 21 You say at the next paragraph, at
 22 paragraph 25, that:
 23 "Once [you] passed [your] exams and became
 24 accredited [you] were able to carry out your
 25 duties as an Accredited Financial Investigator

35

1 **Q.** You say this new role was campaigned for by
 2 David Pardoe. Is it right that the purpose of
 3 creating the role was to recoup losses through
 4 the Proceeds of Crime Act 2002?
 5 **A.** Yes.
 6 **Q.** You and Mr Matthews were both successful in
 7 obtaining the role. Was it initially just the
 8 two of you who held that role?
 9 **A.** I think Graham Ward was with us for a very
 10 short -- for a few weeks or a month, but he went
 11 back to being Casework Manager and it remained
 12 as myself and Mick Matthews.
 13 **Q.** You had a national remit covering all areas of
 14 the UK?
 15 **A.** Not Scotland.
 16 **Q.** You discussed the training you received for the
 17 role at paragraph 24 of your statement. Could
 18 we have that on screen, please. It is page 8 of
 19 the statement. At paragraph 24, you say this:
 20 "All training for my Financial Investigator
 21 role was provided under the Asset Recovery
 22 Agency (ARA), who at that time were the
 23 Government department established under the
 24 Proceeds of Crime Act 2002 ('POCA') to take
 25 action against those benefiting from crime. As

34

1 independently."
 2 Do you mean by that that you no longer
 3 carried out your work under the supervision of
 4 Elaine Blewitt, the police Accredited Financial
 5 Investigator.
 6 **A.** That's correct.
 7 **Q.** But you did report to David Pardoe, who was your
 8 Senior Authorising Officer?
 9 **A.** We did, yes.
 10 **Q.** Mr Pardoe would review and approve any work you
 11 had done, where necessary, in line with ARA
 12 guidance?
 13 **A.** Correct.
 14 **Q.** You deal with what your role as a Financial
 15 Investigator entailed at paragraph 26 of your
 16 statement, about halfway down the page, and you
 17 say this:
 18 "My role as a Financial Investigator
 19 essentially involved the recovery of financial
 20 loss suffered by the POL following a conviction
 21 for crimes such as theft of POL assets and false
 22 accounting. This involved investigating what
 23 assets were held by the convicted individual and
 24 how they could potentially cover the loss
 25 suffered, and the likelihood of recovery. In

36

1 some cases it also involved making a case for
2 restraint over particular assets found, in order
3 to stop them from being dissipated prior to any
4 application for a confiscation order being
5 awarded following a conviction. Any restraint
6 considered would not be done without the
7 approval of my Senior Authorising Officer (David
8 Pardoe), and ultimately the approval of the
9 Criminal Law Team."

10 You go on at paragraph 27:

11 "I would also put together an application to
12 the court for a confiscation order. In doing
13 so, I would produce a Section 16 statement,
14 completed on a pro forma available from the ARA.
15 Such statement would attach and address all the
16 evidence obtained during my financial
17 investigation against the convicted individual
18 and attempt to logically set out my reasoning,
19 aims and objectives around obtaining
20 a confiscation order, for the judge to consider.
21 It would be passed on to the Criminal Law Team
22 to review and approve. If approved, they would
23 then arrange for it to be served on the
24 defendant's solicitor and filed at court."

25 You say at paragraph 28 that, where the
37

1 Investigation Unit had no role in enforcing
2 a confiscation order once obtained. Can you
3 just explain why that was?
4 **A.** Once we'd gone through the court process of
5 confiscation and the order was made, it then
6 went to the Regional Asset Recovery Teams,
7 whether that's by the Asset Recovery Agency or
8 by the courts themselves. They would follow
9 through and they were the people programmed to
10 make recoveries once the order was made. It
11 didn't come back to our team. We were kept
12 informed about when money was received and when
13 it was going to come back, and it was -- it came
14 back to the Criminal Law Team.

15 But we were kept informed about the
16 process -- not the process, but the actual
17 amounts that were recovered. But the process of
18 recovery was outside of the Post Office Limited.

19 **Q.** You also say, at paragraph 30 of your statement,
20 that the Financial Investigator did not play any
21 part in investigating the potential criminal
22 incident. In relation to a number of the
23 specific cases you address in your statement,
24 you were copied into correspondence about the
25 progress of a criminal prosecution. Can you

39

1 court proceeded to grant a confiscation order,
2 it would always be requested that a compensation
3 order be attached for the same amount. You
4 address this in a little more detail at
5 paragraph 115 of your statement. Can you
6 explain, please, why this was done, the request
7 for a compensation order?

8 **A.** Yes. The -- any funds obtained from
9 a confiscation order were then -- would then go
10 centrally to the Asset Recovery Agency and that
11 money would be distributed between all those
12 bodies carrying out financial investigations and
13 was used to drive forward further confiscation
14 initiatives throughout the UK. So that money
15 would not come back to Post Office Limited as
16 the loser in this case, the public money.

17 So, therefore, you were acquired to attach
18 a compensation order which then would take the
19 confiscated amount and pay that exact same money
20 in compensation back to Post Office Limited. So
21 it didn't disappear into the Asset Recovery
22 Agency coffers for distribution; it came back to
23 Post Office Limited. There was no double
24 jeopardy; it was the same money.

25 **Q.** You say in your statement that the Financial
38

1 assist with why that was?

2 **A.** I think once the -- it was coming to the
3 Financial Investigators for confiscation, people
4 just naturally started to copy us in and keep us
5 informed about the process and where we were.
6 It was quite important for us to know the court
7 process because we needed documents ready so
8 that we could produce them at the sentencing
9 hearing, for example a -- I think it was
10 a Section 18, which was a provision of
11 information, which would have to be served on
12 the day, so we would need to know when -- or
13 what stage cases were in the prosecution
14 process.

15 But they kept us informed of all those types
16 of -- once the cases were going to be picked up
17 by the confiscation team.

18 **Q.** You say at paragraph 30 that the Financial
19 Investigator might start the recovery process
20 earlier than post-conviction, in cases where
21 a subpostmaster had admitted to actions of theft
22 or false accounting from the outset; is that
23 right?

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

25 **Q.** You say in your statement at paragraph 31 that,

40

1 when Mr Matthews left the Post Office in late
2 2006 or early 2007, you were left with the
3 entire Financial Investigation caseload. Do we
4 take it from that that, apart from the short
5 time you remember Graham Ward being involved,
6 until that point, the Financial Investigation
7 Team consisted of you and Mr Matthews reporting
8 to David Pardoe?

9 **A.** That's correct.

10 **Q.** But after Mr Matthews left, two others were
11 brought in to help manage the workload?

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

13 **Q.** Those other two were Paul Southin and Graham
14 Ward?

15 **A.** That's correct.

16 **Q.** At that point, is it right that you became
17 Financial Investigation Unit Manager and you
18 trained Mr Southin and Mr Ward to manage their
19 own recovery cases?

20 **A.** I did. I took them through the same process
21 that we went through with the Asset Recovery
22 Agency taking the lead role in the examinations
23 and training as well.

24 **Q.** So they had the same experience that you did?

25 **A.** Yes, but I was their mentor.

41

1 the Financial Investigation Unit sat within the
2 investigatory arm of the Security team?

3 **A.** That's correct.

4 **Q.** But its role was distinct from the role of
5 Investigation Managers?

6 **A.** That's correct.

7 **MS PRICE:** Sir, I have reached the end of one topic.
8 I wonder if we might take our morning break at
9 that point, slightly earlier than usual.

10 **SIR WYN WILLIAMS:** Yes, certainly, yes. So what are
11 we going to do, begin again at 11.25?

12 **MS PRICE:** Yes, sir, thank you.

13 **SIR WYN WILLIAMS:** Fine. Thank you.

14 (11.09 am)

(A short break)

16 (11.25 am)

17 **MS PRICE:** Hello, sir, can you see and hear us?

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

19 **MS PRICE:** Mr Harbinson, you deal at paragraph 45 of
20 your statement with policy and guidance applying
21 to the work of Financial Investigators. Could
22 we have paragraph 45 on screen, please. That's
23 page 18 of Mr Harbinson's statement. You say:

24 "I have been asked to set out the
25 legislation, policies and/or guidance that

43

1 **Q.** I see. Was it at this point when the Financial
2 Investigation Unit formally came into being,
3 when Mr Matthews left and you were given two
4 other people?

5 **A.** Sorry?

6 **Q.** So, prior to this point, had the Financial
7 Investigation Unit existed formally as a unit,
8 or had it just been you and Mr Matthews doing
9 the work?

10 **A.** Before, it was -- if we -- we were a team
11 together, Mick Matthews and I, and the team
12 became three people, when it was myself, Graham
13 Ward and Paul Southin. But that was the
14 Financial Investigation Unit, yes.

15 **Q.** Had you always been known as the Financial
16 Investigation Unit, from the point you and
17 Mr Matthews took up your roles?

18 **A.** I see where you're coming. I'm not sure when
19 this -- the word "Unit" was added on but I think
20 probably you're right that it was when there was
21 three of us.

22 **Q.** You went on to become the Senior Authorising
23 Officer for Mr Southin and Mr Ward?

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

25 **Q.** You say at paragraph 42 of your statement that

42

1 covered the conduct of criminal and financial
2 investigations during the period I worked within
3 the Security team. When I worked as
4 an Investigation Manager within the Security
5 team, I do not remember any particular internal
6 policies or guidance that governed the work
7 I carried out. I believe that policies were
8 created and introduced over time but I am unable
9 to pinpoint when or what they related to. I can
10 only rely on the policies provided to me with
11 the Request, and as explained above, most of
12 those policies post-date my time at the POL.
13 However, as I was investigating incidents that
14 may have a potential criminal element, which
15 involved carrying out interviews under caution
16 and taking witness statements during
17 an investigation, I was of course required to
18 understand and adhere to the Police and Criminal
19 Evidence Act 1984 and the PACE Codes of
20 Practice. There were other acts that I had to
21 refer to and whilst I would not be able to
22 reference these from direct memory, I believe it
23 would have been all the legislation listed in
24 Section 3.15 of the document."

25 At paragraph 46 you talk about when you

44

1 joined the Financial Investigation Unit and you
 2 say:
 3 "Again, when I joined the Financial
 4 Investigation Unit, I believe there were no
 5 internal policies or guidance to govern our
 6 practice in place. We were a new subsection
 7 within the Security Team, therefore, internal
 8 policies and guidance documents were yet to be
 9 created. We relied on the policies and guidance
 10 put in place by the ARA, which our police
 11 mentor, Elaine Blewitt, would have made us aware
 12 of. Unfortunately I cannot recall what those
 13 specific policy or guidance documents were,
 14 especially as they evolved continuously in line
 15 with developments to POCA and changes within the
 16 ARA itself."

17 When you stopped being supervised by your
 18 police mentor, how would you have been made
 19 aware of any changes in policy or guidance?

20 **A.** The Asset Recovery Agency continued and
 21 maintained contact with us, as they did with all
 22 other Financial Investigators, and there was
 23 continual updates sent to us later on, I recall,
 24 that they gave us weekly or monthly tests. They
 25 sent us changes in the Proceeds of Crime Act,

45

1 Process Text", the document is, as you observe,
 2 undated. It has two sections, one starting on
 3 the first page, dealing with "Security &
 4 Investigation Financial Investigation Unit
 5 Criminal Debt Recovery Process" for amounts
 6 under £25,000 (*sic*).

7 Then on page 11 of this document, please,
 8 there is a section dealing with "Security &
 9 Investigation Criminal Debt Recovery Process"
 10 for more than £20,000. Going back to the first
 11 page, please. Towards the end of the first
 12 paragraph here, there is a reference to you
 13 being the Financial Investigation Unit Manager.

14 **A.** Yeah.

15 **Q.** Based on the reference to the Joint Asset
 16 Recovery Database, which you think the Post
 17 Office only started using from 2009, is it right
 18 that you think this document is likely to have
 19 been created at some point in that year, in
 20 2009?

21 **A.** I believe so. I'm not sure when this document
 22 was created.

23 **Q.** Well, if it assists to look at your statement,
 24 it's paragraph 41 of your statement. You say
 25 the reference to you as a Financial

47

1 they kept us informed with changes and updates,
 2 so we were constantly -- we were always in
 3 contact with the Asset Recovery Agency and their
 4 trainers.

5 **Q.** You say you would have relied heavily on the
 6 Proceeds of Crime Act itself to ensure that you
 7 were carrying out your practice appropriately --

8 **A.** Absolutely.

9 **Q.** -- and this was the central piece of legislation
 10 that governed your activities as a Financial
 11 Investigator?

12 **A.** Yes.

13 **Q.** You note in your statement that the policy
 14 documents which do specifically relate to
 15 Financial Investigation Policy post-date your
 16 time as an employee of the Post Office. There
 17 is, however, an undated document which you were
 18 provided with for the purposes of preparing your
 19 statement, which you describe as an early
 20 attempt as a process map relating to the work
 21 undertaken by the Financial Investigation Team,
 22 in line with the guidance put in place by the
 23 ARA. Could we have that on screen, please. The
 24 reference is POL00084989.

25 The title is "Security & Investigation Debt

46

1 Investigation Unit Manager indicates the
 2 document must have been created at some point
 3 from 2007 onwards?

4 **A.** And JARD, yeah. I understand now, yes.

5 **Q.** You say:

6 "[It's most] likely to have been created
 7 sometime in 2009, as it refers to the Joint
 8 Asset Recovery Database."

9 **A.** Yes.

10 **Q.** "JARD was a system maintained by the ARA to log
 11 the actions taken in Financial Investigation,
 12 and was implemented later on in my career."

13 But you believe that the Post Office only
 14 started using that from 2009 onwards?

15 **A.** Correct.

16 **Q.** So that's the basis on which you say you think
 17 this document was likely created in 2009?

18 (*No audible answer*)

19 As far as you're aware, is this the first
 20 policy or guidance document that dealt with the
 21 role of the Financial Investigations Unit?

22 **A.** It's the first one I've seen and I don't recall
 23 this one.

24 **Q.** You say you don't recall it. Have you had
 25 a chance to read through the processes set out

48

1 in it for the purposes of preparing your
2 statement?

3 **A.** I've read it through, yes.

4 **Q.** As far as you can recall, do the processes set
5 out in this document reflect the processes which
6 were followed during the time you were the
7 Financial Investigation Unit Manager?

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

9 **Q.** You say at paragraph 59 of your statement that,
10 although Financial Investigators would provide
11 an opinion on the best mode of recovery, you
12 never made the ultimate decision on whether
13 criminal enforcement proceedings should be
14 pursued. Who did make the ultimate decision?

15 **A.** It would be the Criminal Law Team and the senior
16 people within the Investigation Team. It
17 usually came back to us from Dave Pardoe, who
18 was the senior person managing myself and the
19 team, but it came from, I believe, the Criminal
20 Law Team or seniors in the Investigation Team.

21 **Q.** As far as you can recall, was any application
22 for a confiscation order prepared by you not
23 approved by the Criminal Law Team?

24 **A.** It was always -- had to be -- a confiscation
25 order had to be approved by the Criminal Law

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1 pounds or a bank account for a few thousand
2 pounds.

3 There had to be a proportionate effect and
4 there had to be consideration made to the
5 defendant's living -- their ability to live
6 normally within that restraint, so you wouldn't
7 block them from living. You were trying to
8 secure assets that could be used to service
9 a confiscation order in the future.

10 **Q.** Where a decision was made to pursue a restraint
11 order, what was your role in relation to the
12 process?

13 **A.** As the Financial Investigator, I would have to
14 come to a rationale about why I wanted to
15 restrain, what was the objective in restraining
16 the assets. I would have to get the agreement
17 of the Senior Authorising Officer and I would
18 then have to take it to the Criminal Law Team
19 for them to agree for an asset to be restrained.
20 I'd then have to write up the restraining order
21 myself, and I'd have to present it in court for
22 a judge to authorise the restraint. Then
23 I would have to return that back to the -- that
24 would have to be then served on the defendant.

Basically, I think I've run through about

51

1 Team.

2 **Q.** But where that was being proposed, because you'd
3 drafted up paperwork proposing a confiscation
4 order, did the Criminal Law Team ever disagree
5 with the proposal that a confiscation order
6 should be sought?

7 **A.** I wouldn't draw up a Section 16 if it hadn't
8 already been agreed that that's where we were
9 going.

10 **Q.** I see. In terms of the possible modes of
11 recovery, as you term them, can you explain,
12 please, the difference between a restraint order
13 and a confiscation order?

14 **A.** Yes. A restraint order restrains an asset and
15 prevents a person from disposing or reducing
16 that asset until it's resolved in the courts,
17 whereas a confiscation order is the order made
18 by the courts to remove the benefit of
19 a criminal conduct in an order.

20 **Q.** What were the considerations in play when it
21 came to restraint orders?

22 **A.** It had to be proportionate. There had to be
23 a realistic asset to restrain, a benefit within
24 it. But it had to be proportionate: you
25 wouldn't restrain a property for a few thousand

50

1 all I meant to -- as I recall. That would be my
2 job. But it would be -- it would have to
3 authorised, it would have to be signed by
4 a judge. All those things would have to be in
5 place.

6 **Q.** What were the considerations in play when it
7 came to confiscation orders?

8 **A.** The confiscation order needed to list all the
9 assets available for the confiscation. We'd
10 have to list what the confiscation -- what the
11 amount was that the confiscation was for. That
12 would -- the Financial Investigator would have
13 to -- there was quite a process before you
14 arrived at it but you would have to write the
15 Section 16 statement and -- having obtained all
16 the documents, and that would all have to be
17 served on the defendant. They would have
18 an opportunity to reply to that and the court
19 may have made an option for you -- for a further
20 response for the Section 16. But it would then
21 go to court, and the order would be made one way
22 or the other.

23 **Q.** You deal at paragraph 58 of your statement with
24 the case for confiscation where the conviction
25 was for false accounting.

52

1 A. Yes.

2 Q. Could we have that on screen, please. It's

3 page 23 of the statement.

4 At paragraph 58, you say:

5 "Although not impossible, it was a lot

6 harder to justify a case for confiscation where

7 a person had been convicted for false

8 accounting. This is because confiscation

9 essentially relates to removing the convicted

10 person's benefit that they received as a result

11 of criminal conduct, in order to recover the

12 losses faced by the POL. It could be extremely

13 difficult to work out what the benefit received

14 actually was in a false accounting case."

15 When you say it was a lot harder to justify

16 a case for confiscation where a conviction was

17 for false accounting, do you mean in comparison

18 to a conviction for theft?

19 A. Yes.

20 Q. Can you explain why it is easier to achieve

21 a confiscation order following a theft

22 conviction, please? You deal with this a little

23 further at paragraph 109 in your statement.

24 A. I understand. Because on a theft you have

25 a figure of benefit of the criminal conduct, and

53

1 Investigation Team.

2 Q. Do you recall being involved in producing the

3 content of this?

4 A. I don't recall being involved in the --

5 producing the contents of it, no.

6 Q. Do you think that you were, given that your name

7 appears on it?

8 A. It's most likely, yes.

9 Q. Could we turn to page 14 of this document,

10 please. The heading on this slide is "How can

11 I make the offender pay when the courts don't

12 ever award compensation or costs. (Get the

13 'offences charged' right)". The slide goes on

14 as follows, the first bullet point:

15 "Theft, fraud and money laundering offences

16 support the POCA 2002 and Criminal Justice Act

17 1988 confiscation process and in consequence

18 recovery of the loss."

19 Bullet point 2:

20 "Settling for false accounting as the

21 predicate offence creates massive problems with

22 recovery (what is the offender's benefit)."

23 Bullet point 3:

24 "The investigation and the interview should

25 be programmed to establish what has happened to,

55

1 so it's quite easy to set out your objective in

2 the confiscation order to say, "I want to

3 recovery the -- that figure, because that's the

4 figure that was involved in the theft".

5 Whereas, in false accounting, you've got to

6 come up and arrive at a figure how the person

7 benefited by that figure in a false accounting.

8 So one is easier than -- they're not impossible,

9 but they're -- one's easier than the other.

10 Q. Could we have on screen please document

11 reference POL00121639. This is a presentation

12 handout, which you comment on at paragraph 66 of

13 your statement. You describe it as being

14 an attempt to raise the understanding and

15 profile of recovery through POCA and the role of

16 the Financial Investigation Unit within the Post

17 Office.

18 The title here is "Financial Investigations

19 Partnership for Recovery". Your name and Graham

20 Ward's on that front slide.

21 Was this presentation delivered to the Post

22 Office Criminal Investigators.

23 A. I don't remember this -- I can see that we

24 produced it but I don't remember it. Its

25 purpose would have been to go out to the

54

1 what is and where is the criminal property, what

2 offences have occurred, and to what extent

3 others are involved in those offences and/or

4 have benefited."

5 Is this you sharing your view, expressed at

6 paragraph 58 of your statement, with the

7 Criminal Investigation Team, namely that it was

8 harder to get a confiscation order for false

9 accounting than it was for theft and other

10 offences?

11 A. I think that's within it. I don't think that's

12 the extent of it -- of my view there.

13 Q. Could we have on screen, please, page 3 of this

14 presentation. This covers the Fraud Team's

15 recovery objective for 2007 to 2008. The first

16 bullet point says:

17 "Deliver casework effectively to ensure sure

18 30% loss recovery, or greater, is achieved

19 2007/08.

20 "It would not be unreasonable to project

21 future Fraud Strand recovery targets to increase

22 year on year."

23 The next bullet point:

24 "Deliver casework effectively to ensure 35%

25 loss recovery, or greater, is achieved 2008/09."

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1 3:
2 "Deliver casework effectively to ensure 40%
3 loss recovery, or greater, is achieved 2009/10.
4 Etc. Etc."

5 Is it fair to say that recovery was a key
6 goal for the Fraud Team?

7 **A.** It was a goal for the Financial Investigation
8 Team. I would have hoped that it was a -- that
9 more Investigators would look at the recovery
10 side of things.

11 **Q.** Could we have on screen, please, POL00051539.
12 Looking please at the email about halfway down
13 the page, from Phil Taylor, a Legal Executive in
14 the Criminal Law Team, to Warwick Tatford,
15 counsel in the case to which this email relates,
16 the case of Seema Misra, this is dated 22 May
17 2009. The email reads as follows:

18 "Hi Warwick,

19 "I am just a little bit in the dark about
20 Misra. You will recall that there is one count
21 of theft and some false accountings. The
22 Defence will plead Guilty to the false
23 accountings and Jon Longman is fairly happy for
24 us to accept those pleas. However, we are some
25 70-odd thousand pounds light at the moment as

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1 others, including Graham Brander and Dave
2 Pardoe. It is dated 15 November 2007 and we see
3 there it relates to the case of Josephine
4 Hamilton. It reads as follows:

5 "I refer to previous correspondence
6 regarding this matter.

7 "As you know there has been some discussion
8 as to whether or not pleas to false accounting
9 would be acceptable. I note this would be
10 agreeable providing that Mrs Hamilton were to
11 repay the full amount.

12 "On Counsel's request this matter has been
13 listed for Mention on 19 November 2007. The
14 purpose of this is to see whether or not the
15 trial can be vacated. It is possible that
16 Mrs Hamilton may wish to enter pleas to false
17 accounting. I understand however that she is
18 not yet in a position to repay and has not given
19 a date as to when this can be done.

20 "One option would be for the theft count to
21 be left on file pending payment by the date of
22 trial or some later date."

23 Then in bold:

24 "Ged

25 "Could you let me have your views as to

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1 I understand it and if we just accept the false
2 accountings it is very difficult for us later to
3 obtain a Confiscation Order and subsequently
4 compensation out of the Confiscation.

5 "Could you let me have your views on this.
6 I would be very grateful to hear from you."

7 Did you share your view on getting the
8 charges right and the difficulty of achieving
9 a confiscation order off the back of a false
10 accounting conviction or plea with the Criminal
11 Law Team; do you remember having any discussions
12 with them about that?

13 **A.** I think, later we see a document where I exactly
14 say that to the Criminal Law Team. I'm not
15 surprised by that, no.

16 **Q.** You provided some advice on confiscation in
17 relation to the prosecution of Josephine
18 Hamilton and you deal with that at
19 paragraphs 106 to 110 of your statement. Could
20 we have on screen, please, document reference
21 POL00049154. This is a memo from Juliet
22 McFarlane -- so scrolling down, please, to the
23 bottom -- Principal Lawyer, Criminal Law
24 Division, to the Investigation Team -- scrolling
25 up to the top, please -- copied to you, among

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1 confiscation in this matter, and if appropriate
2 the prospect of recovery under such an order.
3 A copy of the indictment is attached."

4 Do you recall giving advice in this case now
5 or are you reliant on the documents?

6 **A.** I'm reliant on the documents.

7 **Q.** Your response was provided by email on
8 16 November 2007. Could we have that on screen,
9 please. It's POL00049168. It's page 2 of that
10 document, please. You see the email from you to
11 Juliet McFarlane, copied to Graham Brander,
12 16 November 2007. You say this:

13 "Juliet

14 "Thank you for your memo.

15 "I am never confident with false accounting
16 charges in relation to recovery under POCA 2002
17 and the theft charge makes life so much easier.
18 The defendant has General Criminal Conduct under
19 the proposed charges and this would be so with
20 just the false accounting however we have been
21 challenged once before when proceeding to POCA
22 where only false accounting was charged, and
23 I would probable be more inclined to except
24 Particular Criminal Conduct when dealing with
25 confiscation in that scenario. I fully

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1 understand the balance of cost in court time
2 against recovery and if the charge of theft was
3 dropped for a guilty plea then I would still
4 believe it appropriate to follow to confiscation
5 and ask for a 'Benefit figure' of £40,201.58
6 (increase in the value of money)."

7 Then you deal with the apparent assets in
8 the case and, at the bottom, you summarise your
9 opinion. Your opinion is:

10 "1. Charge her with theft and go to
11 confiscation, or

12 "2. Accept a plea of false accounting and
13 go to confiscation

14 "3. If she pays us before we can always
15 draw back out of the case but we need minimum
16 £40,201.58."

17 What stage did you understand the
18 proceedings to have reached when you were
19 providing your opinion? I know it's difficult
20 casting your mind back now.

21 **A.** I can't recall exactly. I would imagine we were
22 looking at sentencing -- sorry, no, that's not
23 right. Looking at going to court. But I'm
24 really not sure what position we were at there.

25 **Q.** But you --

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1 16 November 2007. It is copied to you and the
2 material parts of it read as follows:

3 "Graham

4 "I have forwarded Ged's memo to Counsel,
5 Richard Jory. I have informed him that whilst
6 there is no outright objection to proceeding
7 with the False Accounting, there is a concern as
8 to recovery of Money. We have to date been able
9 to recover where False Accounting only is
10 charged though on one or two cases the Defence
11 will argue against.

12 "Whilst a plea to Theft would be preferable,
13 in the event of non-payment the intent would be
14 to proceed to confiscation."

15 Then, at the top of the page, the first
16 page, we have an email from Graham Brander to
17 Juliet McFarlane, dated 19 November, and it
18 reads:

19 "Juliet

20 "REF: Hamilton Mention Hearing 19 November
21 2007 -- Winchester Crown Court.

22 "Richard Jory advised me earlier today that
23 he hadn't received this email. Any chance you
24 could forward it to him again.

25 "Hamilton pleaded guilty to the 14 FA [false

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1 **SIR WYN WILLIAMS:** I think we must be in a position
2 where criminal proceedings had started --

3 **A.** Yes.

4 **SIR WYN WILLIAMS:** -- wherefore a charge had been
5 laid, because counsel is talking about getting
6 is listed for mention a couple of days later,
7 isn't he, to sort it out? So there clearly are
8 charges by this stage.

9 **MS PRICE:** So you were not being asked to advise in
10 relation to what charges should be brought in
11 the first place here, were you --

12 **A.** No.

13 **Q.** -- but asked to advise in the context of whether
14 the theft charge should be dropped?

15 **A.** No. I think I was being asked my opinion on how
16 it might have affect confiscation.

17 **Q.** Indeed. Do you recall ever being asked to
18 advise on the confiscation implications of
19 potential charges at the time that a reviewing
20 lawyer was making the initial decision whether
21 to charge a suspect and, if so, with what?

22 **A.** No.

23 **Q.** Going, please, to page 1 of this document,
24 towards the bottom of the page there's an email
25 from Juliet McFarlane to Graham Brander, dated

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1 accounting] charges.

2 "Agreement by both counsels that provided
3 full amount (I advised Richard of increase in
4 value of money) is repaid by sentencing date
5 (25/01/08) then the single theft charge would be
6 dropped.

7 "Richard stipulated that if the full amount
8 wasn't repaid by that time, we would go to trial
9 in respect of the theft charge, unless it could
10 be shown that payment would soon be forthcoming;
11 in which case sentencing would be adjourned."

12 Had you ever intended that your view would
13 form the basis of a stipulation that all sums
14 should be repaid in order to avoid a theft
15 trial?

16 **A.** No.

17 **Q.** Are you aware now that the way this was dealt
18 with, that making repayment a condition of
19 dropping the theft charge, was criticised by the
20 Court of Appeal when it overturned
21 Mrs Hamilton's conviction?

22 **A.** No.

23 **Q.** There is a memo from Juliet McFarlane also dated
24 19 November 2007, which you were copied into.

25 Can we have that on screen, please. The

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1 reference is POL00044388. We see that this memo
2 goes to the Investigation Team, copied
3 specifically to Graham Brander, you and David
4 Pardoe. It reads as follows, and this again
5 relates to the Josephine Hamilton case:

6 "The Defendant appeared before the Court
7 today. The prosecution was represented by
8 Mr Richard Jory of 9-12 Bell Yard ... and the
9 Defendant was represented by Anita Saran.

10 "The Defendant pleaded Guilty to the false
11 accounting counts 2-15 on the indictment. The
12 case has been adjourned to 25 January 2008 for
13 pre-sentence reports.

14 "The Defendant has been informed that full
15 payment must be made prior to that date. The
16 theft count has remained on file on the
17 understanding that it should be proceeded with
18 if the money is not repaid.

19 "It is believed that the Defendant has
20 monies which will be available at the end of the
21 year. If the Defendant does not repay then
22 consideration will need to be given to the
23 practicalities of proceeding with the charge of
24 theft or whether confiscation proceedings should
25 pursue.

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1 A. No.

2 Q. What is your view on the appropriateness of that
3 as you sit here now?

4 A. With the knowledge of where we are now, then it
5 probably was -- not probably, it wasn't
6 appropriate.

7 Q. Was this a Post Office line to take, that the
8 computer not working properly was not to be
9 entertained as a defence to a criminal
10 allegation?

11 A. It's something I'm not aware of, no.

12 Q. Could we have on screen, please, document
13 reference POL00119228. This is a memo dated
14 16 September 2009 and, scrolling down, actually,
15 we can see there from Paul Southin to the Fraud
16 Team. It's copied to you.

17 Scrolling back up, please, it reports on the
18 outcome of a case and the first paragraph reads
19 as follows:

20 "Following successful negotiations between
21 the FIU, the Investigator and the solicitor
22 representing the defendant, the full amount of
23 the loss (£27,407.43) was repaid via a BACS
24 payment into a bank account of Post Office Ltd."

25 Was it common for the Financial

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1 "I note that the compensation outstanding is
2 £36,644.89.

3 "I note that the figure canvassed of
4 £40,201.58 is a sum which includes interest, the
5 greatest sum will no doubt be pursued should
6 confiscation proceedings be brought."

7 Then this:

8 "It has been made clear to the Defence that
9 there must be some recognition that the
10 Defendant had the money short of theft and that
11 a plea on the basis that the loss was due to the
12 computer not working properly will not be
13 accepted.

14 "As stated above the next hearing is on
15 25 January 2008."

16 Do you now recall Mrs Hamilton raising
17 allegations that the Horizon system was not
18 working properly?

19 A. No, I don't remember that memo.

20 Q. You were being told, among others in this memo,
21 that a plea on the basis that the loss was due
22 to the computer not working properly would not
23 be accepted. Can you recall whether you formed
24 any view at the time on the appropriateness of
25 that?

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1 Investigation Unit to be involved in
2 negotiations in the context of criminal
3 investigations?

4 A. No.

5 Q. Can you help with why the FIU was being referred
6 to there as being involved in negotiations?

7 A. No, I don't know whether Paul Southin is
8 referring to himself or as the team, but I don't
9 remember that.

10 Q. Where a confiscation order was pursued, did your
11 role involve anything over and above the steps
12 you've already discussed in relation to
13 confiscation proceedings?

14 A. No.

15 Q. You have been provided with a number of memos,
16 among the documents which had been provided to
17 you quite recently by the Inquiry, which suggest
18 that you were notified following an audit where
19 shortfalls were identified on some occasions.

20 In what circumstances would the Financial
21 Investigation Unit be notified following
22 an audit?

23 A. You mean by the Auditors to us, or just
24 following an audit?

25 Q. Well, either by the Auditors or by someone else,

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1 following an audit but at that stage of
 2 proceedings where a shortfall had been
 3 identified on an audit?
 4 **A.** I think normally we'd be informed once there was
 5 an investigation into a loss over a certain
 6 amount but, normally, it came later than that.
 7 But we were -- no, we normally were informed
 8 once there was an investigation into a loss.
 9 **Q.** Also among the documents more recently provided
 10 to you by the Inquiry, are a number of memos
 11 which suggest that, because a case was not being
 12 criminally investigated or prosecuted, the Late
 13 Account Team should pursue any outstanding
 14 losses. Does that represent a default position
 15 on the part of the Post Office to pursue
 16 a suspect via a criminal investigation or
 17 prosecution and, if that failed, to refer to the
 18 suspect's case to the Late Accounts or Debt
 19 Recovery Team?
 20 **A.** I'm sorry, I don't understand.
 21 **Q.** Are you aware of the memos I'm referring to
 22 where there is a one-liner, essentially, saying,
 23 "No further action is going to be taken, the
 24 matter should be referred to the Late Accounts
 25 Team"?

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1 please. You see there "Prosecution of Mr Peter
 2 Holmes"?
 3 **A.** Yes.
 4 **Q.** At paragraph 162, you say that you have reviewed
 5 emails dated 30 January 2009, if we could go to
 6 paragraph 162, please. Maybe if we could just
 7 pull up POL00050817, so we know what you're
 8 referring to there. This is an email dated
 9 30 January from you to what appears to be the
 10 Criminal Intelligence Team within Post Office
 11 Limited; is that right?
 12 **A.** Yes.
 13 **Q.** You're authorising cheques in relation to Marion
 14 Holmes and we understand that was in relation to
 15 her financial matters.
 16 What was the Criminal Intelligence Team; who
 17 were they?
 18 **A.** They were an internal team that sat in Croydon
 19 who would obtain documents they had, things
 20 like -- for vehicle checks, that type of thing,
 21 that would go to the DVLC, and those type of
 22 documents.
 23 **Q.** Now, I know you've said at paragraph 3 of your
 24 statement that you don't remember much about the
 25 documents that you've been shown by the Inquiry.

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1 **A.** Yes.
 2 **Q.** So the Debt Recovery Team on the civil side.
 3 **A.** Yes, I saw that document.
 4 **Q.** Yes. My question is whether that reflects
 5 a default position of the Post Office, initially
 6 to pursue a suspect via a criminal investigation
 7 or prosecution and, if that failed, to reference
 8 their case to the Late Accounts Debt Recovery
 9 Team?
 10 **A.** Not that I'm aware of, no.
 11 **MS PRICE:** Sir, those are all the questions I have
 12 for Mr Harbinson. I'm turning to see whether
 13 CPs have any questions.
 14 **SIR WYN WILLIAMS:** Yes.
 15 **MS PRICE:** Mr Jacobs?
 16 **Questioned by MR JACOBS**
 17 **MR JACOBS:** I do have a question, yes, thank you.
 18 I act for 156 subpostmasters, one of who is
 19 the widow of Peter Holmes. You deal with his
 20 case in your statement at paragraph 159. Do you
 21 recall?
 22 **A.** No, I don't.
 23 **Q.** Prosecution of Peter Holmes. Maybe we could
 24 turn, then, to your statement at page 159,
 25 that's 63 of 78, and have that on the screen,

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1 **A.** Yeah.
 2 **Q.** What was your involvement with the Criminal
 3 Intelligence Team? What sort of cases did you
 4 refer to them and why would you contact them?
 5 **A.** I didn't refer cases to them. They -- part of
 6 your -- as a Financial Investigator, as part of
 7 your -- the gathering of information about
 8 assets that might be used in a confiscation
 9 order, you go to them to get DVLA records about
 10 a vehicle, to know whether or not it was
 11 financed or whether -- or the make, models,
 12 those types of things, would come from DVLA.
 13 A person's -- I can't remember the document,
 14 but when you applied for the financial data
 15 about something, you know -- I'm sorry, but
 16 I can't remember the actual document, but it
 17 would have the history of your payments and
 18 things like that. They would be the type of
 19 documents that they would be able to receive,
 20 but they would need to -- you'd need to apply to
 21 get those.
 22 **Q.** Right.
 23 **A.** And there were the connections within that team
 24 that were established with the police and the
 25 DVLA and different departments that obtained

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1 those documents.

2 **Q.** If we could go to paragraph 163 of your
3 statement, please. Sorry to jump around.

4 **A.** Sorry.

5 **Q.** That's WITN08150100, paragraph 163, please,
6 which is on page 65 of 78.

7 In this part of your statement, you refer to
8 a memo and that is a memo from Ms McFarlane,
9 referring you to an accountant's report.

10 **A.** Yes.

11 **Q.** Now, Mrs Holmes has given evidence to the effect
12 that Post Office thought that some money that
13 was in her joint account had been taken by her
14 husband and put into that account and they
15 engaged a forensic accountant and he prepared
16 a report and, as a result of that report, Mr and
17 Mrs Holmes were completely vindicated and Post
18 Office didn't pursue that further.

19 But the question I want to ask you is: why
20 was it had you were looking at accountant's
21 reports? Did you have any experience in
22 accountancy or any particular knowledge of that
23 field?

24 **A.** I did not, no.

25 **Q.** No. Do you recall looking at or analysing

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1 integrity of Horizon figures and there was no
2 proof of any actual loss to the Post Office.

3 Was this something -- was this information that
4 you would have been party to or aware of at the
5 time when you were involved?

6 **A.** No, sir.

7 **Q.** No.

8 **A.** No, sir.

9 **Q.** Finally, at the end of your statement,
10 paragraphs 166 and 167 -- we don't need to turn
11 these up -- you say:

12 "I was not aware of any concerns regarding
13 the robustness of the Horizon IT system during
14 my entire career with the [Post Office]. As far
15 as I was aware, the system operated as was
16 expected."

17 Then you go on to say:

18 "If I had ever been aware that there was
19 a potential problem with the robustness of the
20 ... system, I would have raised this with senior
21 colleagues and flagged to them that in my
22 opinion any criminal investigation would need to
23 cease."

24 Now, the subpostmasters and mistresses that
25 we represent are very keen to know the names of

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1 an accountant's report in relation to this case
2 or in other cases?

3 **A.** I don't recall that, no.

4 **Q.** This may be a difficult question for you to
5 answer, but are you able to say why it is, then,
6 that you were given a forensic accountant's
7 report to look at?

8 **A.** I could only speculate, if you want me to do
9 that.

10 **Q.** Well, yes.

11 **A.** Because we had the title Financial
12 Investigations, people thought we had greater
13 understanding, probably, than we did have in
14 some cases and I think Juliet may well have been
15 saying "Look at this, what's your opinion?"
16 rather than me having a great understanding of
17 what it was. And I think -- I know we can't ask
18 Juliet but I really don't know why she sent it
19 to me. I can't remember.

20 **Q.** Now, the Court of Appeal found that Mr Holmes'
21 prosecution had been an abuse of process. They
22 found that ARQ data had been obtained but it
23 wasn't clear whether it was disclosed and they
24 found there was no evidence to corroborate
25 Horizon evidence, no investigation into the

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1 the individuals who were the decision makers,
2 who would have been able to put a stop to
3 prosecutions once it became clear -- or once it
4 should have reasonably become clear -- that
5 there were problems with the system because of
6 what subpostmasters were saying.

7 So my question for you is: can you name the
8 senior colleague or colleagues, to whom you've
9 referred, who you would have discussed any
10 potential problems with the Horizon system with,
11 with a view to stopping prosecutions if you'd
12 come to know about these problems with Horizon?

13 **A.** Well -- thank you. I think, sir, that, if, as
14 an Investigator, I'd become aware of something
15 like that, I would have spoken to my team leader
16 straight away. If as a Financial Investigator,
17 I was aware of that, I would have spoken to
18 Mr Pardoe.

19 But, you know, it's -- that information
20 would have to go up, wouldn't it? You'd feed
21 up.

22 **Q.** So would Mr Pardoe, for example, have had the
23 authority to investigate and put a stop to
24 prosecutions on the basis of what he was being
25 told from people like you in your position? Or

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1 would that have had to have gone up?
 2 **A.** I think Mr Pardoe -- a question for Mr Pardoe,
 3 but I don't -- I think it would need to go up
 4 further, yeah.
 5 **Q.** Right. What about Mr Utting and Mr Scott? Are
 6 they people that you might have spoken to?
 7 **A.** It's unfair of me, I think, to speculate on what
 8 their positions were, sir.
 9 **Q.** The question I'm asking is: who would you have
 10 gone to, regardless of what they would have
 11 done?
 12 **A.** As an Investigator, I'd have gone to my team
 13 leader. As a Financial Investigator, I'd have
 14 gone to Mr Pardoe.
 15 **Q.** Who was your team leader?
 16 **A.** When I was an Investigator, it changed a few
 17 times. It started off as Tony Utting. There
 18 was a guy called Paul Dawkins, who was my team
 19 leader. There were different people, but that's
 20 20 years ago, so I apologise if --
 21 **Q.** That's quite all right. Thank you.
 22 I just need to ask if I have any more
 23 questions that I need to ask you. I'm told that
 24 I don't, thank you very much.
 25 **SIR WYN WILLIAMS:** Anyone else?

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1 **A.** No.
 2 **Q.** I ask because you've told us that there were
 3 cases where there were challenges when the only
 4 charge left was false accounting. Is this not
 5 one of those cases?
 6 **A.** No.
 7 **Q.** What were the cases, then, that you --
 8 **A.** I don't remember the specific case but they're
 9 not -- they weren't challenges against
 10 confiscation. It's about the amount, what was
 11 the value -- when it's a false accounting, how
 12 did the -- what value did they benefit by? And
 13 there's different ways you can work out the
 14 benefit figure.
 15 It's not always totally just the amount
 16 that's gone but you can benefit from continuing
 17 to receive pay, having false accounted. So the
 18 person's payment -- so they maintain their job
 19 but their money after that period of time could
 20 be considered as benefit from criminal conduct.
 21 So you -- it's -- I didn't say it's impossible;
 22 I said it's more difficult.
 23 **Q.** Well, certainly in Ms Skinner's case and also in
 24 Mrs Adedayo's case, another of our Core
 25 Participants, it was very straightforward: the

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1 **MS PRICE:** Sir, there are some questions from
 2 Ms Page.
 3 **SIR WYN WILLIAMS:** Yes.
 4 **Questioned by MS PAGE**
 5 **MS PAGE:** Thank you, sir.
 6 Just very briefly, Mr Harbinson, I appear
 7 for a group of subpostmasters also, one of whom
 8 being Jannet Skinner, who sits besides me on my
 9 right. Is that a name that rings any bells for
 10 you?
 11 **A.** From the documentation, yes.
 12 **Q.** You've told us about your opinion that it more
 13 difficult to obtain confiscation in cases where
 14 a theft charge had been dropped, leaving only
 15 a false accounting charge, yes?
 16 **A.** Not dropped, but the difference between a theft
 17 charge and a false accounting charge, yes.
 18 **Q.** Well, in Ms Skinner's case, that was what
 19 happened and the theft charge was dropped,
 20 leaving only a false accounting charge.
 21 Even so, there was a -- confiscation
 22 proceedings proceeded and there was
 23 an application from the defence saying that
 24 those confiscation proceedings were an abuse of
 25 process. Does that ring any bells for you?

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1 Post Office simply proceeded in the same way as
 2 it would if it had been a theft charge, for the
 3 full amount that was the shortfall or that they
 4 said was the shortfall.
 5 **A.** Absolutely. Because, in fairness, it wasn't for
 6 the prosecution to talk down the value of the
 7 benefit but for the defence to say, you know,
 8 "How do you obtain your -- you know, what is
 9 your benefit figure? How did you obtain that
 10 benefit figure?"
 11 But you would always go -- the object of the
 12 confiscation within Post Office Limited was to
 13 try to recover the loss amount, the benefit --
 14 as the benefit figure. We didn't go beyond
 15 that. A lot of -- POCA would allow you, in some
 16 respects, to accumulate massive benefit figures.
 17 The objective of the confiscation was to recover
 18 the loss figure.
 19 **Q.** Can you think of any case where you didn't
 20 recover the loss figure, even if it was only
 21 a false accounting charge, or the figure that
 22 Post Office claimed was the loss?
 23 **A.** I can't remember now, no.
 24 **Q.** The advice, then, that you were giving to
 25 continue with theft charges, on the basis of

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1 recovery, was then based on no cases, as such?
2 A. I never -- advice -- my advice wasn't to
3 continue on theft charges. My advice was one is
4 easier and then, I think if you see underneath,
5 I say "Whichever one you do, whatever you do,
6 this is what we should proceed -- you know, we
7 should go for these figures". It was -- I was
8 giving my opinion. The decision for the
9 charging was for the Criminal Law Team.

10 MS PAGE: Yes, thank you. Those are my questions.

11 **Questioned by SIR WYN WILLIAMS**

12 SIR WYN WILLIAMS: On this issue of the comparative
13 difficulties of pursuing confiscation in false
14 accounting cases, does it really come to this,
15 that if the charge was theft and there was
16 either a finding of guilt or a plea of guilty,
17 then there was acceptance that the money stolen,
18 say £20,000, was the benefit figure, yeah?
19 If the charge was false accounting, there
20 would be a variety of ways in which benefit
21 could be looked at but some of those ways would
22 be that the defence would argue that the benefit
23 figure was nothing like as much as the alleged
24 loss to the Post Office.

25 A. Exactly, sir, yes.

1 hear from Diane Matthews, followed by Lisa
2 Allen.

3 SIR WYN WILLIAMS: Thank you very much. See you all
4 then.

5 MS PRICE: Thank you, sir.

6 (12.27 pm)

7 (The hearing adjourned until 10.00 am
8 on Friday, 24 November 2023)

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1 SIR WYN WILLIAMS: Yes, and you were anticipating,
2 quite correctly, that, in some such cases, the
3 advocates for the defence would maintain that
4 argument before the court and the court would
5 accept it.

6 A. Yes.

7 SIR WYN WILLIAMS: So from a purely pragmatic point
8 of view, it was much easier if the charge was
9 theft; that's what it boils down to, isn't it?

10 A. Yes.

11 SIR WYN WILLIAMS: Yes, fine. All right. Thank you
12 very much, Mr Harbinson.

13 Thank you for --

14 Oh, sorry. Are there any other questions?

15 MS PRICE: No, sir. I think those are all the
16 questions from Core Participants.

17 SIR WYN WILLIAMS: Fine.

18 Well, then, thank you Mr Harbinson, for
19 making your witness statement and for giving
20 evidence this morning. I'm grateful to you.

21 THE WITNESS: Thank you, sir.

22 SIR WYN WILLIAMS: So we adjourn until Friday; is
23 that right, Ms Price, and we have two witnesses
24 on Friday?

25 MS PRICE: We do. We resume at 10.00 on Friday to

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