

Friday, 24 November 2023

(10.00 am)

Announcement re evidence of Lisa Allen

MS PRICE: Good morning, sir. Can you see and hear us?

SIR WYN WILLIAMS: Yes, thank you.

MS PRICE: Sir, before we proceed to today's evidence, there is a matter which you have asked me to address at the outset of today's hearing. We were due to hear today from two witnesses: Diane Matthews and Lisa Allen. As you are aware, we will now be hearing from Ms Matthews only, following a decision you made late yesterday afternoon relating to Ms Allen's evidence.

Earlier this week, Ms Allen, who is employed by Royal Mail, alerted the Inquiry Team to the existence of 90 documents relating to the investigation and prosecution of Suzanne Palmer held by Royal Mail. She was able to find these documents, as she has access, as an employee, to Royal Mail systems.

The Inquiry sought, and has now been provided with, these documents. It appears that a significant proportion of the documents have

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confirm that Ms Allen has confirmed she is able to attend to give evidence on 20 December in place of today.

SIR WYN WILLIAMS: Thank you very much, Ms Price.

In view of the very full explanation which you provided, I don't propose to add anything, especially given that the Inquiry Team and the Post Office are engaged in seeking to ascertain what went wrong on this occasion. However, if Ms Gallafent does wish to say anything at this stage, I will afford her the opportunity to do so now.

MS GALLAFENT: Sir, simply to say we are grateful to the Inquiry for acting upon this so promptly and in particular informing other Core Participants that Ms Allen wouldn't be able to give evidence today in the circumstances, and meaning that Ms Allen -- I'm so sorry, Ms Palmer -- didn't need to come today.

But we do apologise to Ms Palmer because, obviously, the expectation of coming and hearing from Ms Allen itself is a difficulty and problematic for any individual involved in these proceedings.

I can confirm that we in Post Office are

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not been provided to the Inquiry previously. It is also evident that the documents are highly relevant both to Ms Palmer's case and to Ms Allen's involvement in it. In these circumstances, and mindful that these documents need to be disclosed to Core Participants so that they can consider them ahead of Ms Allen giving evidence, you concluded that it is not practicable to proceed with Ms Allen's evidence today. It is right to note that this appears to be a different species of disclosure problem than the Inquiry has encountered previously.

The Inquiry Team is investigating, with the Post Office, how this problem has come about. At your request, the Inquiry Team communicated your decision about Ms Allen's evidence to Core Participants by email yesterday afternoon, immediately after it was made. This has meant that unnecessary travel for Mrs Palmer, who was intending to attend today to hear Lisa Allen's evidence, has been avoided.

Finally, sir, you expressed a wish that Ms Allen attend to give evidence on a replacement date before the break to minimise the impact on the timetable. I am able to

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continuing to look into how this particular issue arose but we agree with the analysis of Counsel to the Inquiry that it appears to be of a different sort to those previously encountered and we hope a one-off that can be easily remediable. I have nothing further to assist in terms of what may have happened but we will obviously write to the Inquiry as soon as we are in a position to assist in that respect. Thank you, sir.

SIR WYN WILLIAMS: All right, thank you very much.

Over to you, Mr Beer.

MR BEER: Thank you, sir, can I call Diane Matthews, please.

DIANE SARAH MATTHEWS (affirmed)

Questioned by MR BEER

MR BEER: Good morning, Ms Matthews. My name is Jason Beer and I ask questions on behalf of the Inquiry. Can you give us your full name, please?

A. Yes, it's Diane Sarah Matthews.

Q. Thank you very much for giving evidence remotely today and for previously providing a witness statement to the Inquiry. You should have a copy of that witness statement in front of

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1 you; is that right?
 2 **A.** I do, yes.
 3 **Q.** It's dated 1 November 2023 and, excluding the
 4 exhibit sheet, is 36 pages in length. Can you
 5 go to the 36th page, please?
 6 **A.** Yes.
 7 **Q.** Is that your signature?
 8 **A.** It is, yes.
 9 **Q.** Are the contents of the statement true to the
 10 best of your knowledge and belief?
 11 **A.** Yes.
 12 **Q.** Thank you. A copy of that witness statement is
 13 going to be uploaded to the Inquiry's website.
 14 I'm going to ask you some questions about some
 15 parts of it; do you understand?
 16 **A.** I do, yes.
 17 **Q.** Thank you. Can we start with your professional
 18 background, please. I think you joined the Post
 19 Office in March 1986 as a counter clerk; is that
 20 right?
 21 **A.** Yes.
 22 **Q.** You left Royal Mail Group in 2018; is that
 23 right?
 24 **A.** It is, yes.
 25 **Q.** So 32 years' service?

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1 **A.** Yes.
 2 **Q.** I'm principally interested, as you'll know, in
 3 the four or so year period between 2004 and
 4 2008, when you worked in the Post Office as
 5 an Investigator and then as a manager of other
 6 investigations.
 7 But, before we look at that period, that
 8 four-year period, can we look back at earlier
 9 period. You tell us at paragraph 2 of your
 10 statement -- there is no need to turn it up at
 11 the moment -- when referring to your secondment
 12 to the Horizon rollout team between 1999 and
 13 2003, that you had a role:
 14 "... managing a team of 22 Horizon Field
 15 Support Officers in ensuring they were supported
 16 in managerial terms, for example, timetable,
 17 accommodation and performance."
 18 **A.** That's correct, yes.
 19 **Q.** Was your role, as that sentence might suggest,
 20 purely an administrative one, concerned with the
 21 management and logistics of the team, or did you
 22 have any substantive involvement in the rollout
 23 process itself?
 24 **A.** Well, when I joined in 1999 I was part of
 25 a small group of people that did what was called

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1 **A.** Yes.
 2 **Q.** Looking into the divisions within that 32 years,
 3 I think you were a counter clerk for 13 years
 4 between 1986 and 1999; is that right?
 5 **A.** Yes, various things within the branch office
 6 network, yeah.
 7 **Q.** Between 1999 and 2003, you were seconded to work
 8 on the rollout of the Horizon system; is that
 9 right?
 10 **A.** Yes.
 11 **Q.** Between 2003 and 2004 you worked as an Assistant
 12 Branch Manager and then an Audit Manager; is
 13 that right?
 14 **A.** Yes.
 15 **Q.** That included conducting some audits yourself?
 16 **A.** Yes, the audits I conducted were normally at
 17 Crown Offices, the larger ones.
 18 **Q.** Then between 2004 and 2008 you worked in the
 19 Post Office Investigation Department, being
 20 promoted in 2007 to a Security Manager managing
 21 a team of Investigators; is that right?
 22 **A.** Yes.
 23 **Q.** In 2008, you moved to Royal Mail Group as
 24 an Investigator, where you stayed for 10 years
 25 until 2018 when you retired?

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1 live trial and it was migrating -- it was only
 2 a small amount of post offices and I remember
 3 I went to Northern Ireland and Belfast to do
 4 that, and they were put onto the Horizon system
 5 and it was like a test.
 6 And it was after that that it got paused and
 7 I stayed working within that function then to
 8 take over the administrative duties, in terms of
 9 pulling the team together and what that schedule
 10 would look like.
 11 From that period, I didn't attend offices
 12 doing the migration. My role was purely to look
 13 after the people that were out there in the
 14 field doing that role.
 15 **Q.** Dealing with the first part first, then, when
 16 you were involved with offices themselves, this
 17 was live trials rather than rollout; is that
 18 right?
 19 **A.** That's correct.
 20 **Q.** Did you receive the feedback that the branches
 21 that you were responsible for gave as to what
 22 was going on in the course of the live trial?
 23 **A.** I wouldn't say I received the feedback.
 24 I obviously knew when I was there, undertaking
 25 the role, that there was issues. What came

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1 further along as part of them issues, I wasn't
2 party to that detail, really. I knew from my
3 role that the office migrated, there was network
4 issues, that's what I was told was the problem
5 with it, was network issues, and the office
6 carried on working.

7 It did have some problems with the
8 functionality, in terms of it kept crashing,
9 there was hardware problems, and then, after --
10 I think I was there three days, and it was more
11 a case of helping the counter clerks understand
12 the workings, the balancing, the day-to-day
13 duties that needed to be done. And then after
14 that, it went to a much higher level than me to
15 determine what them issues were and what was
16 going to happen next.

17 **Q.** So in the course of the live trial, you were
18 told about problems that included network
19 issues. I think you've told us about problems
20 with connectivity --

21 **A.** Yes.

22 **Q.** -- with hardware, and did you say balancing, as
23 well?

24 **A.** No, not with the balancing. I was there to
25 assist some of the balancing, but when you say

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1 stock figures onto the Horizon system.

2 They would then stay for a period of --
3 I think it was normally three days, and they
4 would stay at the office and assist the
5 subpostmaster and their staff with the
6 transition from manual to computer-based ways of
7 serving and balancing. They would then -- if
8 a Wednesday wasn't part of them three days, they
9 would then return and assist with one of the
10 balancing days or the first balancing day.

11 **Q.** We have heard evidence about a series of
12 problems, some of them significant, that were
13 identified and evident during the testing and
14 rollout phases. Were you aware at the time of
15 such problems identified during the four or so
16 year period that you undertook this role?

17 **A.** I was aware there was issues, yes.

18 **Q.** In terms of significance or scale of issues, can
19 you help us with what your memory is of that?

20 **A.** Yeah, my recollections were that it was
21 sufficient enough to delay the actual rollout at
22 first. I think, when rollout did start there
23 was also delays with certain offices. To be
24 honest, I was led to believe they were more
25 network issues and there was some problems with

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1 was told about that, I experienced that. I saw
2 that firsthand because I was there when they
3 were having issues with it. But, obviously,
4 there was engineers on site for this particular
5 part of the process, because it was right at the
6 very beginning. So anything that needed to be
7 addressed was addressed there and then.

8 **Q.** How long did this work last?

9 **A.** My role in it?

10 **Q.** Yes.

11 **A.** Yeah, um, I can remember I did two offices.

12 I know one was in Belfast, I think the other one
13 was probably in the UK, and it was only a very
14 short period of time. I think I stayed four
15 days at each office, and that probably took me
16 from when I joined, probably to, it was over
17 maybe a three-month period.

18 **Q.** I see. Then you became responsible for 22
19 HFSOs, the Field Support Officers?

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

21 **Q.** What did the Field Support Officers do?

22 **A.** They were there to oversee the day of migration,
23 so they would liaise with the Auditors that
24 would go in, perform an audit and they would
25 then take over in terms of entering the cash and

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1 maybe a keyboard not working, but I do know --
2 not in my area but I do know nationally that
3 there was probably more substantial problems
4 with getting offices onto the system.

5 **Q.** Did you gain any knowledge about difficulties in
6 balancing using the new system?

7 **A.** I knew there were issues balancing, yes, but
8 I think that was put down more to user issues.
9 It wasn't -- I don't think at first it was
10 particularly user-friendly for someone that had
11 never used any sort of computer-based equipment
12 before and I think it was a massive transition
13 for some people, and I knew that, therefore,
14 there was problems balancing.

15 I also knew that there was problems
16 balancing because of significant figures that
17 were being generated, and --

18 **Q.** Sorry, significant figures being generated by
19 what?

20 **A.** The system was just -- I'm trying to remember
21 an example. There was figures put in suspense
22 accounts and the next week it would drop off,
23 and it was like nobody had an answer as to why,
24 and these were like put down as maybe people not
25 using it right, maybe people -- maybe the

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1 systems hadn't been migrated correctly, but
 2 I didn't really get into them issues because
 3 that's not what my role was at the particular
 4 time.

5 **Q.** So trying to encapsulate what you've just said,
 6 in the course of this testing and then the
 7 rollout phase, the system was generating large
 8 discrepancies that were placed in a suspense
 9 account and then would disappear, and you say
 10 they put it down to either user error or the
 11 system; is that right?

12 **A.** Figures were on a balance -- on a printout on
 13 balance day and nobody could identify where it
 14 had come from. So, therefore, that figure then
 15 got put into a suspense account and it
 16 dropped -- it got dropped. Why that happened,
 17 whether it was a transaction that hadn't been
 18 put in correctly, I wasn't there, and I just
 19 know that one or two of my team reported issues
 20 up to Fujitsu because of that.

21 Therefore, my role in that was to provide
 22 that office with extra support. So my role was
 23 to then reschedule the HFSSOs to obviously make
 24 sure that personnel could be there. So I wasn't
 25 close to the detail of them problems. I just

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1 size and magnitude -- we were told it was the
 2 biggest single computer install in the UK --
 3 that there was teething problems, that there
 4 were going to be issues and that the --
 5 obviously, they would monitor and work through
 6 them.

7 That's how it was portrayed right at the
 8 very beginning and I just thought that, you
 9 know, it just stands to reason there's going to
 10 be concerns, there's going to be issues and that
 11 they were worked through and resolved.

12 **Q.** Who was passing you that message, the one that
 13 you've just relayed to us?

14 **A.** It was just part of the Horizon team. It was
 15 just -- it probably came from quite high up.
 16 I can't remember who was over the Horizon
 17 install project. But they were the messages
 18 that were cascaded down.

19 **Q.** Were they, in turn, cascaded down by your team
 20 to subpostmasters?

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

22 **Q.** So the overall impression, by the time we get to
 23 2004, that you walked away with, was that
 24 although there were problems with the system,
 25 this was to be expected in a system so large and

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1 knew that I had to change some of what my
 2 scheduling was because the office needed more
 3 support because of it.

4 **Q.** Did you ever experience problems in using
 5 Horizon when you were acting as an Assistant
 6 Branch Manager?

7 **A.** No.

8 **Q.** Were you aware of others around you experiencing
 9 problems with Horizon when you were acting as
 10 an Assistant Branch Manager?

11 **A.** No.

12 **Q.** By the time that you finished your job as
 13 Assistant Branch Manager, if I'd asked you
 14 what's your view as to the reliable and
 15 robustness of Horizon, what would you have said?

16 **A.** I'd have said it was reliable and robust because
 17 I never personally experienced any problems or
 18 knew of anybody in the Crown Office Network that
 19 I worked with that did.

20 **Q.** So what impact had these things that you'd been
 21 told by your HFSSOs, about subpostmasters having
 22 problems with the system, had on your view on
 23 the reliability and robustness of Horizon, by,
 24 say, 2003/4?

25 **A.** It was explained that, with a project of this

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1 complex and these were just teething problems?

2 **A.** At the very beginning, yes. By the time the end
 3 of the rollout was approaching, the migrations
 4 were getting much smoother, they'd probably been
 5 like that for the majority of the final phase.
 6 I mean, some of the problems were that there was
 7 no phone lines put in at an office.

8 It could be a simple explanation as to why
 9 there were delays. It wasn't always to do with
 10 the actual system. It could have been something
 11 to do with some of the pre-work that needed to
 12 be done in order for the install to happen.

13 But by -- you know, I didn't experience
 14 many, if any, reports for about the last
 15 12 months of install. By that, I'm not saying
 16 there wasn't any but there certainly wasn't any
 17 concerns, let's say, that couldn't be put down
 18 to user error or issues with problems with the
 19 electrics, et cetera.

20 **Q.** Can we turn, then, to the four-year period from
 21 2004 to 2008 when you worked in the
 22 Investigations Department. You were a Security
 23 Manager and an Investigator and you carried out
 24 a number of investigations yourself; is that
 25 right?

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1 A. Yes.

2 Q. In that four-year period, how many
3 investigations do you think you undertook?

4 A. It probably wasn't -- it was probably about 20,
5 but my first six months were purely assisting
6 other people because I was bought in on
7 a temporary turn to do pension docket fraud.
8 And then, after that, I got taken on
9 permanently -- so that was probably towards the
10 start of 2005 -- and then, from my best
11 recollection, it was around that time that
12 I undertook the training.

13 So I'd actually been working within the team
14 before I started training but it was purely as
15 an administrative thing, looking at pension
16 docket fraud.

17 Q. So in the four-year period, perhaps five
18 investigations a year?

19 A. Yeah, the first probably 18 months, it probably
20 wasn't anywhere near that but, obviously, as
21 I got more experienced, I was probably given
22 more.

23 Q. When you were carrying out that investigation
24 work, did you have an understanding that all
25 departments and all divisions within the Post

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1 Q. -- by an Investigator to go and find the
2 material and ensure that it's revealed. I'm
3 looking at the stage before then,
4 an organisation that prosecutes people knows
5 that it's under a duty to retain and record
6 information that might be relevant to the
7 prosecution. How was that carried into effect?

8 A. I'm sort of struggling with the question
9 a little bit. I mean, I can tell you what
10 I did.

11 Q. So if I run a sweet shop and I don't prosecute
12 anyone, I might keep my books for a year and
13 then I might throw them away.

14 A. Right, okay.

15 Q. I might not write down everything that I buy and
16 sell because I think "Well, I'm not going to be
17 prosecuting anyone, I needn't do that". If,
18 however, I know that I might prosecute people,
19 I might think to myself that I need this
20 information, not just to know how many sweets
21 I've sold or bought but because I'm going to be
22 prosecuting people, and the information that I'm
23 creating is -- might be used as the basis to
24 prosecute them.

Therefore, I've got these whole other

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1 Office were subject to a legal duty to retain
2 and record information that might be relevant to
3 the Post Office's function of bringing private
4 prosecutions?

5 A. Yes.

6 Q. What were the processes within the Post Office
7 to ensure that such information was retained and
8 recorded?

9 A. When you say "processes", what do you mean?

10 Q. You said that you knew that the Post Office was
11 under a legal duty to ensure --

12 A. Yes.

13 Q. -- that all parts of the organisation, all
14 divisions and departments, retained and recorded
15 information that was or might be relevant to the
16 prosecution function --

17 A. Yes.

18 Q. -- and I'm asking what processes were put in
19 place to ensure that that retaining and
20 recording duty could be carried out?

21 A. Well, we obviously had to follow PACE and CPIA
22 and guidelines -- or, you know, they were --

23 Q. That, Ms Matthews, is more about the reveal
24 function --

25 A. Right, you're --

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1 duties, these legal duties, because I'm not just
2 a seller of sweets; I'm a prosecutor too. I've
3 got to do some different things in the running
4 of my business to make sure that what I do is in
5 compliance with the law and is fair.

6 A. So everything that I did, in terms of when
7 I gathered evidence, we had -- first of all, we
8 had guidelines, we had casework guidelines, we
9 had policies and procedures that we had to
10 follow, that were accessible via database and
11 whatever I did, in terms of an investigation,
12 was documented.

13 So I either made a notebook entry or any
14 evidence that I got was then retained, and it
15 was disseminated onto different forms, depending
16 on how that information was classified.

17 Q. So I'm again looking at the stage --

18 A. I don't really think I'm answering your question
19 here because I'm a bit lost in what it is.
20 I understand what you're saying but I don't
21 know, I can't remember what procedures were in
22 place for that.

23 Q. So was there, for example, a series of data
24 stores that the Post Office had set up that
25 could be accessed by you, where the information

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1 you obtained from them had been recorded in
 2 an evidentially secure fashion?
 3 **A.** I don't remember storing any evidence.
 4 **Q.** Were there, for example, standing instructions
 5 to Auditors that you remember about the way that
 6 they could conduct their audits, because they
 7 weren't just conducting an audit; if the audit
 8 showed a shortfall or a discrepancy, then the
 9 Auditor's evidence might be translated into
 10 criminal prosecution evidence and the Auditors
 11 might be called as witnesses, and what they said
 12 to a suspect, to a postmaster, might be used in
 13 evidence against the postmaster.

14 So what I'm trying to establish is, as
 15 an Investigator, what did you know about the way
 16 that the rest of the business organised itself
 17 to ensure that it was ready to conduct
 18 prosecutions?

19 **A.** I don't know. I can't answer that.
 20 **Q.** What processes, turning to you as
 21 an Investigator, then, existed to ensure that
 22 there was the sufficient collection and
 23 correlation of information relating to the
 24 operation of Horizon?
 25 **A.** From my recollection, it was an online database

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1 Team?
 2 **A.** If an investigation -- if it was to do with some
 3 transactions that were in question or to look at
 4 if, during investigation interviews, that the
 5 person being interviewed had come up with some
 6 reasons why a loss had happened and, if they
 7 related to anything transactional or anything to
 8 do with maybe balancing, then you could always
 9 go and get the transactions and that would
 10 probably dictate if I would ask or not.

11 **Q.** Okay, so if there was a questionable transaction
 12 or if the suspect raised an issue, they would be
 13 the triggers for going off and getting this
 14 data?

15 **A.** Yeah, or it could be further down the line. You
 16 decided that you needed further information or
 17 you needed to clarify something, then you could
 18 request it. But, from my recollection, there
 19 was limits.

20 **Q.** Limits on what?

21 **A.** Limits on the number of -- I think these were
 22 called ARQ requests --

23 **Q.** Yes?

24 **A.** -- and for the business, there was limits on the
 25 number of ARQ requests that could be made in

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1 that you could access and all relevant documents
 2 that you needed to refer to would be on there.

3 **Q.** So, as an Investigator, you could access some
 4 data that was created by Horizon; is that right?

5 **A.** No. I'm talking about operating processes.

6 **Q.** Okay. So, ie policies and procedures about the
 7 conduct of an Investigator?

8 **A.** Yes, I've never been able to access any historic
 9 Horizon data online.

10 **Q.** Okay. So what were the processes for obtaining
 11 access to Horizon data as an Investigator?

12 **A.** From my recollection, I would have to make
 13 a request to the Casework Team and they would --

14 **Q.** Who were the Casework Team? Were they part of
 15 the Security Department?

16 **A.** Yes, they were, yeah. They were a function of
 17 the Security and Investigations based in
 18 Croydon.

19 **Q.** How many of them were there?

20 **A.** No idea.

21 **Q.** So if you wanted some data from or about
 22 Horizon, you would contact the Casework Team?

23 **A.** Yes.

24 **Q.** What would operate on your mind in deciding
 25 whether to make such a request to the Casework

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1 a month. After that quota was taken up, Post
 2 Office Limited had to pay for it and you had to
 3 have a really, really good reason why you needed
 4 it, in order to invoke the cost element of it.

5 **Q.** So did the limitation and then the cost penalty
 6 have an impact on the number of occasions that
 7 you requested ARQ data?

8 **A.** It didn't have an impact on the number of
 9 occasions I requested it; it may have had
 10 an impact on the number of disks that
 11 I received.

12 **Q.** The number of?

13 **A.** Disks, ARQ -- sorry, ARQs came on, like, CD
 14 disks. So I can't recall any particular case or
 15 time when I didn't receive them but I may have
 16 received them in the next month.

17 **Q.** Were there any processes within the Post Office
 18 Security team to ensure that there was proper
 19 recording and cross-dissemination of information
 20 about issues that had been raised as to the
 21 operation of Horizon, in prior investigations
 22 and prosecutions?

23 **A.** I don't know. By the time I left, I hadn't
 24 really heard of issues being raised with Horizon
 25 but, shortly after I left, I knew it was

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1 starting. So I don't know what processes were
2 for that.

3 **Q.** There wasn't a central repository, a database,
4 a share file, some other document where all
5 Investigators within the Security team could
6 feed in problems or issues that had either been
7 raised by a suspect or had been established?

8 **A.** To do with Horizon?

9 **Q.** Yes.

10 **A.** Not while I was there, no. But like I say,
11 I had hardly heard of any issues regarding this
12 before I left.

13 **Q.** If a suspect said that there is some error or
14 bug or defect with Horizon that's causing the
15 loss, was there a central repository of
16 information in the Post Office -- putting aside
17 the Security team for the moment -- to which you
18 would turn to say, "My suspect has suggested
19 that there's a problem with Horizon, what does
20 the Post Office know about an error, bug or
21 defect in the system"?

22 **A.** Not to my knowledge. I didn't know of that.

23 **Q.** Which department or departments would you speak
24 to to gather any information about that?

25 **A.** I never needed to, apart from on one occasion.

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1 or discrepancies in the accounts?

2 **A.** I have no knowledge or idea of what the Post
3 Office knew. I only knew that was the first
4 time it had been raised and brought to my
5 attention.

6 **Q.** Who do you think you may have discussed it with,
7 other than, obviously, Mr Bradshaw, your
8 co-investigator?

9 **A.** Well, there would have been a few people.
10 I mean, specifically about Mr Thomas' case,
11 there was involvement from Emlyn Hughes, the
12 Area Manager. There would have been involvement
13 from Paul Dawkins, my line manager at the time.
14 I would imagine, but I can't speak for him, that
15 that would then have been raised up to John
16 Scott.

17 **Q.** The Head of Security?

18 **A.** Yes.

19 **Q.** In relation to that sort of escalating series of
20 individuals, did you ever any word back that, in
21 fact, there have been allegations made about the
22 operation of Horizon and it -- the system --
23 causing shortfalls and discrepancies, almost
24 right from the beginning, from 2000?

25 **A.** I didn't know of any other case, at that moment

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1 **Q.** That's Mr Hughie Thomas' case; is that right?

2 **A.** Yes. And, obviously, what I did is I raised it
3 to Criminal Law Team and also the Casework Team
4 were aware of it, as well as obviously my team
5 leader.

6 **Q.** You tell us that -- and it's paragraph 41 of
7 your statement, no needed to turn it up for the
8 moment -- that when you left in 2008, Mr Thomas'
9 case involving alleged faults with the Horizon
10 system remained the only investigation that you
11 led or had involvement in, in which such claims
12 were made; is that right?

13 **A.** Yes.

14 **Q.** Did you discuss the claims made by Mr Thomas
15 with the rest of the Investigation Team?

16 **A.** I can't remember. I obviously knew that Steve
17 Bradshaw -- he was with me at the time, he
18 obviously knew. A team leader would have known.
19 I guess I would have told the rest of the team,
20 it would have been a discussion point because
21 I think it was the first time that claim had
22 been made.

23 **Q.** To your knowledge, was that the first time that
24 the Post Office had heard of an allegation of
25 a fault with Horizon that was leading to errors

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1 in time, where the integrity of the Horizon
2 system had been brought into question.
3 I obviously knew from my previous working
4 history that there'd been issues right at the
5 beginning but we were led to believe that they
6 had been resolved.

7 **Q.** When you say you were "led to believe", was that
8 a sort of a corporate message; is that a fair
9 way of describing it?

10 **A.** Yes.

11 **Q.** In paragraph 24 of your witness statement you
12 set out the process followed by Security Team
13 Investigators when conducting an investigation
14 and, in paragraph 30 of your witness statement,
15 you say:

16 "In the investigations I undertook,
17 I followed the evidence trail."

18 Yes?

19 *(No audible answer)*

20 In paragraph 43 of your witness statement
21 you say:

22 "[You] do not know if ARQ data was requested
23 from Fujitsu as a matter of course regarding
24 shortfalls identified which the subpostmaster or
25 clerk attributed to the Horizon system. I was

28

1 not involved in this process."

2 Does it follow that it was your
3 understanding that ARQ data was not requested as
4 a matter of course when an Investigator or
5 a prosecutor sought to rely on Horizon data in
6 their investigation and their prosecution.

7 **A.** It's difficult -- well, I can't answer that
8 question because the only one I knew about was
9 Mr Thomas, and I requested the ARQ data and then
10 I left shortly after. So the majority of the
11 issues were probably after my time but the
12 one -- the only one that I was aware of,
13 certainly within my team, was Mr Thomas.

14 **Q.** I think what you're saying, Ms Matthews, is that
15 it's only if the suspect raised a problem that
16 the trigger would be to request Horizon ARQ
17 data; is that right?

18 **A.** Yes, it is, yeah.

19 **Q.** So it wasn't requested as a matter of course in
20 every investigation or prosecution, in order to
21 prove the loss?

22 **A.** That's correct.

23 **Q.** How was the loss proved then?

24 **A.** By an audit going in and checking the cash and
25 stock on hand.

29

1 stock figures that were on hand were represented
2 on the Horizon system, then you'd accept the
3 figures that were printed off, yes.

4 **Q.** Moving on to your understanding of disclosure
5 obligations, you tell us in your witness
6 statement, as you've done today, that the Post
7 Office Security Department was governed by the
8 provisions of the Police and Criminal Evidence
9 Act and the CPIA, and you tell us that you
10 received training on, amongst other things,
11 disclosing evidence.

12 I just want to explore, without looking at
13 an individual case yet, your understanding of
14 the disclosure obligations.

15 Can you confirm, please, from the
16 perspective of a Security Manager, that you
17 received training on the fundamental importance
18 of disclosure to the criminal process?

19 **A.** Yes.

20 **Q.** Did you receive training on the nature of the
21 statutory disclosure duties owed by
22 an investigator and by a prosecutor?

23 **A.** Yes.

24 **Q.** What did you understand as to whether those
25 duties could be delegated to a third party?

31

1 **Q.** So half of that is walking into the branch and
2 seeing how many stamps, giro's and pound notes
3 are there, yes?

4 **A.** Yes.

5 **Q.** But the other half of it is relying on what
6 Horizon says should be there?

7 **A.** Yes.

8 **Q.** What evidence was obtained, if any, to establish
9 that what Horizon said should be there was
10 accurate or did you just take the balance sheet
11 that Horizon printed out?

12 **A.** It was just taken, yes.

13 **Q.** So you didn't peek behind that as a matter of
14 course to see the process by which that account
15 had been created by the system?

16 **A.** You wouldn't doubt the integrity of the system
17 because we were led to believe that wasn't in
18 question. So --

19 **Q.** Putting aside whether you were told that the
20 system had integrity or was robust or not,
21 I think it follows that you didn't think that
22 there was a need to prove the accuracy of the
23 account that Horizon produced; it was sufficient
24 if Horizon produced an account?

25 **A.** I think it was accepted that, if the cash and

30

1 **A.** I've probably got slightly confused when I've
2 written my witness statement. My understanding
3 was it's up to the Investigator to obtain,
4 collate and disclose all documentation.
5 However, I've probably misinterpreted the
6 question and seen the disclosure as disclosure
7 to the defence, which wasn't part of my duty.

8 **Q.** Were you trained on something called the "three
9 Rs", does that ring a bell?

10 **A.** Is that -- yeah, um, you've put me on the spot
11 now but I do recall it. Is it --

12 **Q.** Retain, record and reveal?

13 **A.** Yes, yes.

14 **Q.** That was part of the training?

15 **A.** Yes.

16 **Q.** Was there training on how those maybe abstract
17 or theoretical principles were translated into
18 effect within the Post Office: ie how the
19 business was going to retain; how the business
20 was going to record; and how the business was
21 going to reveal documents?

22 **A.** I don't remember that. I don't remember
23 receiving specific training. That's not to say
24 I didn't. I just can't remember.

25 **Q.** Did you receive training about a CPIA Code

32

1 requirement about reasonable lines of inquiry?
 2 **A.** I can't remember specifically.
 3 **Q.** What did you understand the duty of
 4 an Investigator to be in terms of the pursuit of
 5 lines of inquiry?
 6 **A.** That you had to follow all lines of inquiry to
 7 understand what's gone on in a particular
 8 situation.
 9 **Q.** Whether they pointed away or towards the
 10 suspect's --
 11 **A.** Absolutely, yes.
 12 **Q.** -- guilt, yes?
 13 **A.** Yes.
 14 **Q.** Was that translated into practice, again, that
 15 high level statement of a duty in operation in
 16 the Post Office, ie what must we do when
 17 a suspect says that it's Horizon that's causing
 18 discrepancies in their branch?
 19 **A.** Well, again, I can only recall the one time I've
 20 had to deal with that and, obviously, I took it
 21 extremely seriously and made relevant decisions
 22 to try to find out whether the Horizon system
 23 was to blame, or causing issues, or had bugs and
 24 defects. It has to be checked.
 25 **Q.** You tell us in your witness statement -- it's

33

1 **Q.** Never in your four years was there any material
 2 that might undermine a prosecution or help
 3 a defendant?
 4 **A.** I don't recall putting anything on a sensitive
 5 schedule. I always remember that everything was
 6 either used or unused and everything was on them
 7 two documents. I don't ever remember having
 8 anything that was classified as "sensitive".
 9 **Q.** Putting aside the sensitive for the moment,
 10 whose decision was it whether material should be
 11 disclosed to the defence?
 12 **A.** The Criminal Law Team.
 13 **Q.** You tell us in paragraph 58 of your statement
 14 that you were not the Disclosure Officer in any
 15 cases.
 16 **A.** Yeah. I think I have misinterpreted the
 17 question on that. I understand my duties as
 18 Disclosure Officer was to provide all the
 19 information to the Criminal Law Team. What I've
 20 read into that question was what then happened
 21 in order to disclose it to the defence.
 22 **Q.** I see. If we just look at what you say in your
 23 witness statement, page 18 of your witness
 24 statement -- it will come up on the screen for
 25 you -- at the foot of the page.

35

1 paragraphs 57 and 58, no need to turn them up --
 2 that you completed disclosure schedules to
 3 ensure that relevant unused material was
 4 scheduled and brought to the attention of
 5 reviewing lawyers and the Prosecution Support
 6 Office, yes?
 7 **A.** Yes.
 8 **Q.** When you say that you submitted the relevant
 9 documents for the purposes of disclosure, do you
 10 mean that, when you were the Investigating
 11 Officer in a case, you would collate the unused
 12 material that you had gathered and complete the
 13 relevant schedules of material yourself?
 14 **A.** Yes.
 15 **Q.** Would they include a schedule of non-sensitive
 16 material, a schedule of sensitive material and
 17 a Disclosure Officer's report?
 18 **A.** Yes.
 19 **Q.** What processes would you undertake to ensure
 20 that a reviewing lawyer was aware of the
 21 existence of material that may assist the
 22 defence or may undermine the prosecution case?
 23 **A.** I would ensure that they were aware of it but
 24 I don't actually recall ever having anything
 25 like that.

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1 We're dealing here with Janet Skinner's case
 2 and at 58 you say:
 3 "I was not the Disclosure Officer in this
 4 case or any cases. The decision on what was
 5 disclosed was a legal matter and dealt with by
 6 the Prosecution ... Team. I submitted all
 7 documents to them on the relevant paperwork and
 8 I played no further part in the dissemination of
 9 the evidence."
 10 If we go forwards to page 34, at
 11 paragraph 99, when we're dealing with Hughie
 12 Thomas' case, you say in 99:
 13 "I was not the Disclosure Officer in this
 14 case. This was undertaken by the Prosecution
 15 Support Office."
 16 I think you just told me that you
 17 misunderstood the questions that led to those
 18 two paragraphs, 58 and 99. What had you
 19 misunderstood?
 20 **A.** I've taken it as -- when talking about
 21 disclosure, disclosure to the defence. Not
 22 disclosure to -- from the outset, of the
 23 investigation. I thought it was discussing the
 24 disclosure to the defence lawyers.
 25 **Q.** Had you received training on what the role and

36

1 duties of a Disclosure Officer were?

2 **A.** I would have done at the time, but you're asking
3 me this question now, you know, about -- I've
4 misinterpreted a question.

5 **Q.** I'm going to show you in probably an hour's time
6 couple of disclosure schedules where you're
7 shown as the Disclosure Officer and you've
8 signed the disclosure schedule saying you
9 complied with your duties as Disclosure Officer.
10 What did you understand your duties as
11 Disclosure Officer were?

12 **A.** That I had to disclose all information that has
13 been obtained as part of the investigation.

14 **Q.** You understood that as meaning disclosure to the
15 Criminal Law Team and then you're drawing
16 a distinction between the actual provision of
17 documents to the defendant, which was undertaken
18 by the Prosecution Support Office; is that
19 right?

20 **A.** I thought that was what the question was asking:
21 who disclosed the information to the defence?
22 That's how I've misinterpreted the question.
23 I understand my role as a Disclosure Officer was
24 to obtain and disclose every piece of
25 information that was gathered as part of the

37

1 witness statement, please, which will come up on
2 the screen. It's page 11. At paragraph 34 you
3 say:

4 "I have been asked what I understood by the
5 bullet points on page 2 of the Casework
6 Management [document]."
7 You had reviewed it:
8 "The first 3 bullet points ... are regarding
9 the documents required to be associated in any
10 case file ... all case files go in the first
11 instance to the Prosecution Support Office.
12 "With regards to bullet point 4 ...
13 concerning failures in operational procedures
14 and security, my recollections on this are
15 anything you observed or encountered which
16 played a part in a fraud being committed or loss
17 in an office."
18 Then you give some examples and say at the
19 end of the paragraph:
20 "These are examples where the business would
21 not want these details to become common
22 knowledge."
23 Can we just look at that document, please,
24 POL00104777. We can see, if we just look at the
25 foot of the page, it's dated October 2002. Then

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1 investigation.

2 **Q.** Okay, that can come down. Thank you.
3 Who or what was the Prosecution Support
4 Office.
5 **A.** They were, from recollection, an administrative
6 function within the Criminal Law Team.
7 **Q.** Were they lawyers?
8 **A.** I don't know. I think -- I know some were legal
9 execs, but I don't know what their legal
10 training was.
11 **Q.** Were they based in one place or more than one
12 place?
13 **A.** I think they were based in London, within the
14 Criminal Law Team, but I couldn't say 100 per
15 cent.
16 **Q.** It was your understanding that they were the
17 ones responsible for physically giving
18 disclosure; is that right?
19 **A.** Yes. Them and, obviously, in line with the
20 assigned lawyer.
21 **Q.** Sorry, can you say that again? Your voice
22 dropped.
23 **A.** Sorry, yeah. The Prosecution Support Office, as
24 well as the assigned lawyer to the case.
25 **Q.** Can we turn to paragraph 34 and 35 of your

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1 look at the top of the page, "Casework
2 management", it's an investigation policy, whose
3 purpose is:
4 "... to ensure that adequate controls are in
5 place to maintain standards throughout
6 investigation processes."
7 Then if we go to the points that you were
8 referring to in your witness statement, which is
9 on page 2, and if we look at the fifth bullet
10 point, the one beginning "The issue of" -- thank
11 you, if that can just be highlighted:
12 "The issue of dealing with information
13 concerning procedural failures is a difficult
14 one. Some major procedural weaknesses, if they
15 become public knowledge, may have an adverse
16 effect on our Business. They may assist others
17 to commit offences against our Business,
18 undermine a prosecution case, bring our Business
19 into disrepute or harm relations with major
20 customers. Unless the offender states that he
21 is aware that accounting weaknesses exist and he
22 took advantage of them, it is important not to
23 volunteer that option to the offender during
24 interview. The usual duties of closure under
25 the Criminal Procedure and Investigations Act

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1 1996 still apply."
 2 Was it your understanding that, if your
 3 investigation identified a procedure failing or
 4 some other irregularity, that may undermine
 5 a case against a suspect or assist them in some
 6 way, that had to be brought to the attention of
 7 Legal Services?

8 **A.** Yes.

9 **Q.** If we just look at the bullet point above,
 10 please, bullet point 4:

11 "If, during the course of an enquiry,
 12 failures in security or operational procedures
 13 are identified which may or may not be directly
 14 connected with the offence/s under
 15 investigation, full detail must be included
 16 within the report to Legal Services. If
 17 necessary, any urgent remedial action can be
 18 notified to the appropriate operational manager
 19 verbally," et cetera.

20 So, irrespective of what's in that fifth
 21 bullet point, you knew that, if a procedural
 22 failure or some other irregularity that
 23 undermined a case against a suspect existed,
 24 that had to be brought to the attention of Legal
 25 Services; is that right?

41

1 **A.** No. I didn't see it like that.

2 **Q.** How did you see it?

3 **A.** I saw it as anything that might not only, not
 4 only allow people to take advantage but also
 5 could bring the company into question. So,
 6 again, we use Horizon. If I was aware that it
 7 was Horizon, that would be raised.

8 **Q.** Raised with who?

9 **A.** Through the Criminal Law Team but, if that was
 10 the case, it would probably also be raised to
 11 a much higher level --

12 **Q.** This policy is saying don't reveal that to the
 13 suspect in the interview?

14 **A.** At that particular time, though, if it wasn't
 15 an issue about Horizon, I wouldn't reveal
 16 anything because I wouldn't have anything to
 17 reveal at that time, because it would mean
 18 I would have to go and check the -- you know,
 19 the situation that had been put in front of me.

20 **Q.** Can I turn to a different topic, the last of the
 21 general issues before we look at the case
 22 studies, and your understanding of the
 23 relationship between the instruction of
 24 an expert and the duties of disclosure.

25 Did you know that the instruction of

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1 **A.** Yes.

2 **Q.** Would that be in the confidential investigation
 3 report that was submitted to Legal Services?

4 **A.** Yes.

5 **Q.** Can you recall instances where, in the words of
 6 the policy, the business would not want the
 7 details to become public knowledge?

8 **A.** I can remember a couple of them, yes.

9 **Q.** Were they to do with physical security issues?

10 **A.** One was to do with an Alliance & Leicester issue
 11 in particular.

12 **Q.** Was that to do with the way that the system
 13 operated?

14 **A.** It was to do with the system allowing a customer
 15 to make multiple deposits of up to £20,000 at
 16 a time into the system, without any checks. So,
 17 in other words, one of the cases I had was
 18 £500,000 had been deposited during somebody's
 19 lunch hour and the system allowed them to do it,
 20 and it was obviously a weakness where there was
 21 no checks.

22 **Q.** Did you understand what we've just read in the
 23 policy about not revealing procedural weaknesses
 24 to be, and only to be, about cases where future
 25 advantage might be taken of the weakness?

42

1 an expert gave rise to distinct and particular
 2 disclosure obligations on the part of the
 3 prosecution?

4 **A.** No.

5 **Q.** Were you aware of a requirement, I'm not going
 6 to set out where it arises, that communications
 7 with an expert were subject to a particular duty
 8 to retain?

9 **A.** I don't recall that.

10 **Q.** Does that mean that you wouldn't have included
 11 communications with an expert on your schedules
 12 of unused material?

13 **A.** I would include everything that I had as part of
 14 the case on the schedules, in terms of it would
 15 go somewhere. But when you say about an expert,
 16 in order to get an expert witness statement,
 17 I wouldn't personally do that.

18 **Q.** Who would personally do that?

19 **A.** From my best recollection, I would go to the
 20 Casework Manager and --

21 **Q.** Who was the Casework Manager; was it Mr Ward?

22 **A.** I think Graham Ward was one of them.

23 **Q.** We're going to see, over the next couple of
 24 hours, your involvement in procuring evidence
 25 from Gareth Jenkins, in the case of Hughie

44

1 Thomas, looking at a wide variety of
 2 communications, either involving you or in which
 3 you were a copyee, about the content of the
 4 evidence that he was going to give about
 5 revisions to his witness statement, about adding
 6 bits in and taking bits out. Would you have
 7 understood that those communications were
 8 disclosable to the defence --
 9 **A.** Yes.
 10 **Q.** -- and that they should be listed in the
 11 Schedule of Unused Material?
 12 **A.** Yes.
 13 **Q.** When we look at the Schedule in due course, in
 14 Mr Thomas' case, we can see that they were not
 15 listed. Looking at the matter generally, do you
 16 know why that was?
 17 **A.** My only recollection of how that would have
 18 happened was because when -- I would do my first
 19 disclosure of all the evidence I had. The
 20 statements would then form part of the evidence
 21 that was gathered after, that went to the
 22 Prosecution Support Office and would be added
 23 then.
 24 I didn't see the bundle again after I'd done
 25 my initial disclosure of all the information I'd

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1 investigation and prosecution proceeded?
 2 **A.** I was led to believe that would be done by the
 3 department.
 4 **Q.** Who led you to believe that it was to be done by
 5 the department?
 6 **A.** Because that was my liaison with them in the
 7 Criminal Law Team and Prosecution Support
 8 Office.
 9 **Q.** Okay, well, we'll maybe see this in action when
 10 we look at specific cases. Just, lastly,
 11 generally, did you understand that you were
 12 under a duty to disclose to the defence drafts
 13 of witness statements, if they materially
 14 differed from the final signed version?
 15 **A.** Yes.
 16 **Q.** Can we look at Hughie Thomas' case, then,
 17 please, and can we start, please, with
 18 POL00047748. These are the terms of reference
 19 with the criminal investigation into Mr Thomas.
 20 Can you see, if we just scroll down, please,
 21 "Investigator": you're shown as the
 22 Investigator, yes?
 23 **A.** Yes.
 24 **Q.** If we pan back out, just look at the whole of
 25 the page, is this a document that was completed

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1 got from the initial investigation. I wouldn't
 2 do a supplementary one. It would be added as --
 3 you know, by the prosecution team and Criminal
 4 Law Team, as part of new evidence.
 5 **Q.** Whose duty was it to conduct a rolling
 6 disclosure exercise by the completion of
 7 successive Schedules of Unused Material as the
 8 investigation proceeded?
 9 **A.** I'm presuming it was the Prosecution Support
 10 Office and Criminal Law Team.
 11 **Q.** You're saying that you did one schedule and one
 12 schedule only when you submitted the papers, and
 13 that was it?
 14 **A.** My best recollection of what I did at the time
 15 is that I did the initial scope of work, of
 16 which I then did disclosure on every document
 17 I had. These were supplementary things that
 18 I didn't really have much involvement in, from
 19 my recollection and when that statement came --
 20 **Q.** We're going to see in a moment that you did have
 21 some involvement in them but, putting that to
 22 one side, did you not understand your duty as
 23 the Investigator and the Disclosure Officer to
 24 include the preparation and submission of
 25 supplemental Schedules of Unused Material as the

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1 at the beginning of the investigation?
 2 **A.** I believe so but I don't actually recall this
 3 document.
 4 **Q.** Well, I was going to ask you what the purpose of
 5 the terms of reference document for a criminal
 6 investigation was.
 7 **A.** I don't recall. I can't remember that document.
 8 **Q.** Was it a document completed by the investigator?
 9 **A.** I'm presuming so, yes, but I don't ever remember
 10 seeing -- or I don't have any recollection of
 11 that document.
 12 **Q.** If we just look, we can see the office name at
 13 the top, which is Mr Thomas' office. It says,
 14 "Customer 1", Emlyn Hughes, "Service and
 15 Contracts Manager". What function did Mr Hughes
 16 perform?
 17 **A.** He was the Area Manager for North Wales.
 18 **Q.** So he's described as "Customer 1"; what does
 19 that mean?
 20 **A.** I've no idea what "Customer 1" means because
 21 I don't recollect this form at all. But I knew
 22 who Emlyn Hughes was. He looked after the
 23 subpostmasters and their contracts. He wasn't
 24 anything to do with the Security team.
 25 **Q.** If we scroll down, please, to the big box at the

48

1 bottom. Thank you. "Details of Incident":
 2 "Audit took place on 13 October 2005.
 3 Result of which was a loss of [£48,000-odd].
 4 The majority of the loss was in cash.
 5 "Subpostmaster, Mr Thomas, was arrested on
 6 suspicion of theft of Post Office funds.
 7 "Cash Accounts do not show any loss/gains so
 8 there is also false accounting.
 9 "Mr Thomas has blamed the loss on the
 10 Horizon system saying online banking
 11 transactions are producing nil totals when he
 12 has given cash out over the counter to
 13 customers.
 14 "Mr Thomas insists that he only has access
 15 to the office while the only other user on the
 16 system is his wife.
 17 "[He] has a buyer for the Post Office and
 18 expects to reimburse the Post Office with the
 19 proceeds of the sale."
 20 Then the line which says -- three paragraphs
 21 from the top there, "Mr Thomas has blamed the
 22 loss on the Horizon system", and then he gives
 23 an explanation, it's "online banking that are
 24 producing nil totals when he has given cash ...
 25 out to customers", if we go over of the page,
 49

1 Horizon and identifying what the issue was?
 2 **A.** Yes.
 3 **Q.** So that ought to have resulted in
 4 an investigative activity; is that right?
 5 **A.** Yes.
 6 **Q.** Can we move forwards then, please, to
 7 FUJ00155181. If we start at the back, we're
 8 going to end up with this ARQ request. If we
 9 start at the back of page 23 of this document,
 10 please -- and if we just scroll to the page
 11 above, please, the bottom of the page above,
 12 thank you -- we see an email there from you to
 13 Mr Ward of 14 October 2005; can you see that?
 14 **A.** Yes.
 15 **Q.** Can you see that?
 16 **A.** Yes.
 17 **Q.** Thank you. You say:
 18 "Graham,
 19 "Just to clarify, the subpostmaster has not
 20 made any calls to HSH or NBSC ..."
 21 Do you now recall what those are?
 22 **A.** Yes.
 23 **Q.** Can you tell us what your recollection of HSH
 24 and NBSC is now?
 25 **A.** HSH, I think, is the Horizon System Helpdesk and
 51

1 please, box 6:
 2 "As a result of an initial scoping exercise
 3 ... in this section the investigator has
 4 identified the initial activities to be
 5 undertaken in dealing with this incident.
 6 "Objective: To collate information regarding
 7 the background for £48,000 loss at branch.
 8 "Action: To interview the [subpostmaster]
 9 Mr Thomas and seek reasons for the audit loss at
 10 the branch. Gather facts surrounding problems
 11 at branch.
 12 "Outcome anticipated: Obtain relevant
 13 information. Look to recover the audit loss of
 14 £48,000", by 25 October 2005.
 15 Can you help us why this does not include,
 16 given Mr Thomas had squarely blamed the loss on
 17 Horizon, any mention, as an investigative
 18 action, an investigation into the Horizon
 19 system.
 20 **A.** I don't recall this form. So I can't add
 21 anything to it.
 22 **Q.** I mean, that's a pretty obvious line of inquiry,
 23 isn't it, given what he had said --
 24 **A.** Yes.
 25 **Q.** -- a suspect raising squarely the problem with
 50

1 NBSC is the -- I think it's the National Support
 2 Centre.
 3 **Q.** Network Banking Support Centre?
 4 **A.** That's it, yes.
 5 **Q.** Can you now recall who each of those were
 6 operated by, HSH and NBSC?
 7 **A.** Sorry? I didn't hear that.
 8 **Q.** Can you recall who operated each of those?
 9 **A.** I can't recall.
 10 **Q.** You don't now remember whether they were Post
 11 Office operated or Fujitsu operated?
 12 **A.** Well, the Horizon -- I think the Horizon System
 13 Helpline may have been Post Office but
 14 I wouldn't -- I can't recall for sure.
 15 **Q.** Okay, you say he has not made any calls to
 16 either of them:
 17 "... prior to yesterday's audit, and is now
 18 voicing his concerns over the nil transactions
 19 on card account/online banking transactions.
 20 "I believe that there are at least 2
 21 scenarios where a nil value [are] recorded.
 22 These are ..."
 23 Then you set them out:
 24 "If a customer places a card into the PIN
 25 pad ..."
 52

1 Then the second one:
 2 "If a customer places a POCA card into the
 3 PIN pad."
 4 Yes?
 5 **A.** Yes.
 6 **Q.** Over the page, please:
 7 "Please can you check any other
 8 possibilities of nil values on these types of
 9 transactions with Fujitsu.
 10 "Also as the subpostmaster is blaming the
 11 [Horizon] system on his losses, please could we
 12 check there are no problems with the Horizon kit
 13 at the branch."
 14 The branch is going to remain closed.
 15 So you're saying "I think that there are two
 16 scenarios where a nil value will be recorded on
 17 Horizon, but please can you, Mr Ward, go to
 18 Fujitsu to see whether there are any others?"
 19 **A.** They were the only two scenarios at that time
 20 I could think of but I couldn't 100 per cent say
 21 there was no others. Also, I note there to
 22 confirm the branch will remain closed.
 23 I recall, when I got there, the branch had
 24 actually reopened and then I asked for it to be
 25 closed because I wasn't happy -- if Horizon had

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1 relevant?)
 2 "This case is in its early stages, but if it
 3 were to proceed to a prosecution, we'd likely
 4 need a statement which outlines how you can
 5 confirm that there were no operating errors in
 6 this office's system. I haven't submitted
 7 an ARQ yet but can do so if you feel it's
 8 needed."
 9 Okay, so a general email from Mr Ward to
 10 Fujitsu asking whether there are or were any
 11 serious errors on the system at this post office
 12 but he hasn't submitted an ARQ, yes?
 13 **A.** Yes.
 14 **Q.** Then if we go to page 19, please, foot of the
 15 page, please. You're not copied in on these,
 16 but I just want to see what happens within
 17 Fujitsu first. There's an internal email from
 18 Brian Pinder within Fujitsu, forwarding the
 19 chain we've just looked at:
 20 "Obviously this has not come our way yet,
 21 but meanwhile any thoughts comments? I guess we
 22 just wait for an ARQ, but do we (Security) have
 23 anything in our arsenal, to go back to Graham
 24 with at all?"
 25 Then scrolling up, Ms Lowther forwards it to

55

1 been given as a reason for the losses, I didn't
 2 think it was appropriate that we continue
 3 undertaking transactions on a system that may
 4 have issues.
 5 **Q.** Okay. Can we scroll up, then, please to the top
 6 of page 22. Thank you.
 7 Mr Ward, on the same day, a couple of hours
 8 later, emails Fujitsu, copying you in -- can you
 9 see that --
 10 **A.** Yes.
 11 **Q.** -- saying:
 12 "The email below from one of our
 13 investigators says it all.
 14 "Is there a check that can be made to ensure
 15 there are/were no serious errors on the system
 16 at this post office? We already have details of
 17 calls made to the Helpdesk (see spreadsheet
 18 below), which do not highlight anything obvious.
 19 Are there general error type reports that will
 20 tell you when there is a problem with the
 21 system, which the Post Office may not
 22 necessarily be aware of, particularly in
 23 relation to the highlighted paragraph. Have
 24 there been similar problems elsewhere? (I've
 25 heard of Tivoli event logs. Could these be

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1 Oddette Moronfolu:
 2 "Could you advise us on this please."
 3 Then Ms Moronfolu forwards it to Richard
 4 Craig:
 5 "Hi Ric,
 6 "Can you have a look at this?
 7 "They really need to know if there is
 8 anything else that could have caused the nil
 9 transactions."
 10 Then top of the page. He replies:
 11 "The original email makes reference to
 12 an audit. To answer your question definitively,
 13 I'd need to know what data they are auditing
 14 that defines a 'nil transaction'. Is it zero
 15 transaction values in the R or A messages? Or
 16 are they auditing data in some host database or
 17 log? This matters because the counter doesn't
 18 send up an amount value in the R message for
 19 'Withdraw to limit' but that may be represented
 20 as a zero value in a log or database field. The
 21 same might be true for Change PIN and Balance
 22 Enquiry.
 23 "All banking transactions are approved
 24 online with the acquirer. The acquirer may
 25 decline for reasons other than an incorrect PIN

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1 ... These other reasons might also cause a nil
2 transaction.
3 "Nil transactions could also be caused by
4 errors in PIN pad, counter, agents or host code
5 depending on what constitutes a 'nil
6 transaction'. This cannot be determined without
7 access to the appropriate system logs.
8 I understand that it is not felt to be
9 appropriate at this stage for those logs to be
10 examined by development staff. I'd recommend
11 however that counter logs our harvested now
12 before potential evidence is lost."
13 **MR BEER:** I wonder whether we could stop there
14 before we look at the rest of the chain later in
15 October 2005 and, if it is convenient to you,
16 sir, take a break until 11.35.
17 **SIR WYN WILLIAMS:** Yes, of course.
18 **MR BEER:** Thank you.
19 (11.21 am)
20 (A short break)
21 (11.35 am)
22 **MR BEER:** Good morning, sir. Can you see and hear
23 me and Ms Matthews, can you see and hear me?
24 **SIR WYN WILLIAMS:** I can, yes.
25 **THE WITNESS:** Yes, I can.

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1 Ric suggests happens sooner rather than later."
2 Then:
3 "Thanks ... let's leave it at that."
4 Then, please, if we go to page 15, and if we
5 could just look at the foot of the page, please,
6 we can see Penny Thomas from Fujitsu sending
7 Mr Ward an email:
8 "As you know, nothing is ever
9 straightforward! Here's some feedback ..."
10 Then she cuts in the internal Fujitsu email
11 that we'd seen earlier and passes it on to the
12 Post Office, concluding with:
13 "In other words, we need to check the system
14 logs. How would you like to proceed?"
15 Then if we go to the top of the page,
16 please, we can see that you're now copied into
17 this email. It seems that the email I've just
18 looked at was forwarded to you or a reply by
19 Mr Ward to Ms Thomas adding you in:
20 "Penny
21 "Thanks ... but you've confused me!
22 "What is an R&A message?
23 "What is a host database? (I believe the
24 nil transactions were identified on
25 a transaction log.)

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1 **MR BEER:** Thank you very much, can we have back up
2 FUJ00155181, please, and page 18, please, and
3 look at the foot of the page, please. We'd
4 looked at the very bottom email, if we just look
5 at this one, Mr Pinder replies to Ms Moronfolu:
6 "Oddette
7 "Thanks for your input here and I note
8 Richard's reply but without wanting to cause any
9 further unnecessary work (on our part) we have
10 exhausted all reasonable avenues of enquiry on
11 this.
12 "Graham's initial last para states ...
13 ""This case is in its early stages, but if
14 it were to proceed to a prosecution, we'd likely
15 need a statement which outlines how you can
16 confirm that there were no operating errors
17 within this offices system. I haven't submitted
18 an ARQ yet but can do so if you feel it's
19 needed'."
20 "Do we need to follow this up elsewhere or
21 can we leave it at that, is there anything to go
22 back to Graham with?"
23 Then up the page please:
24 "We have nothing to go back to Graham with
25 unless a call is raised to investigate. Which

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1 "I think it is best that the system logs are
2 examined in the first instance (do you need
3 an ARQ for this?), going back to 1 April 2005.
4 Is it possible for you to run a report to show
5 'nil' values for the transaction examples
6 described below, so we can see how often it has
7 happened?"
8 This kind of email exchange that we've seen
9 so far, Ms Matthews, is this essentially how
10 investigations into Horizon were conducted, with
11 email exchanges such as this?
12 **A.** I wasn't aware of the majority of them emails.
13 I wasn't privy to them. From my recollection,
14 I informed the Casework Manager what I needed
15 and he was the liaison point into Fujitsu.
16 **Q.** It looks like, would you agree, that there was
17 no established system?
18 **A.** From my end, the established system was: tell
19 Casework what was required or ask them and they
20 had whatever procedures were in place. But
21 I think, probably back in 2005, there probably
22 wasn't any set procedures or parameters for
23 that.
24 **Q.** I mean, to the outsider, it looks like everyone
25 is flapping around a little, to be honest --

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1 A. Yeah.

2 Q. -- and the only theme that emerges is "Why don't
3 we wait and see whether a prosecution is
4 commenced and then maybe make an ARQ request at
5 that point?" I mean, is that an unfair
6 characterisation?

7 A. I can't really agree or disagree with that
8 because that was not at a level that I was
9 operating at. I certainly wasn't privy to them
10 conversations.

11 Q. Okay, well, Mr Ward seeks to move it on, if we
12 go to page 14, please. You can see, he sends
13 you an email on 25 October, so a day later,
14 copying Mr Dawkins and Penny Thomas in, in
15 relation to the branch there. I'm not going to
16 try and pronounce it, given my tribunal; I'm
17 going to call it the branch on Anglesey. He
18 says:

19 "I've spoken with the Fujitsu Security team
20 and have agreed the following course of action.
21 "Fujitsu will [investigate] a thorough
22 analysis of the system ... going back one month
23 from the date of audit (if we need to go back
24 further we will do). I do not see a need to
25 remove hardware at this point to conduct any

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1 So the date range is a month before the audit,
2 14 September 2005 to 13 October 2005, and the
3 request is:

4 "Please conduct an analysis of all Helpdesk
5 calls for the above period.
6 "Also please conduct a thorough examination
7 of the system in general with a view to refuting
8 the postmaster's allegation that there is
9 a fault with the 'nil' transactions on card
10 account/online banking transactions.
11 "Please bear in mind we are investigating
12 a substantial shortage in the accounts and
13 should this proceed to prosecution we may be
14 asking for a supporting witness statement."
15 Do you get to see these ARQ requests before
16 they are issued?

17 *(No audible reply)*

18 Was that a no, sorry?

19 A. I don't recall seeing any of these documents
20 before.

21 Q. When you say "any of these documents", plainly
22 you saw the emails that I've drawn your
23 attention to at the time?

24 A. Sorry. To clarify, I don't recall seeing any of
25 the ARQ documents before. These weren't

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1 specialist examination of the [processes],
2 particularly given the postmaster did not report
3 any faults with the system to the HSH. I would
4 suggest that a call is logged with the HSH ...
5 outlining the 'alleged' fault and asking them to
6 send an engineer to the site to conduct a test
7 of the equipment prior to the office being
8 reopened. I'm sure they can also perform a few
9 test transactions."

10 Then if we go to page 12, please, this is
11 an internal Fujitsu email, forwarding that email
12 that we've just looked at, saying:

13 "Here's a copy of Graham's request
14 concerning the [branch on Anglesey] outlet.
15 "The 'thorough analysis' I have agreed with
16 Graham is the analysis of all nil transactions
17 on card account/online banking transactions."
18 Then the last paragraph:
19 "As you can see, I've also suggested that
20 [Post Office] log a Helpdesk call and request
21 that the system is checked for error."
22 Then on to page 1, please. We can see the
23 ARQ request that Mr Ward settled. You will see
24 that it's dated 24 October 2005. Then if we
25 scroll down, please, "Information Requested".

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1 completed by me and I've not had sight of them.

2 Q. Did you have the facility to raise ARQ requests
3 yourself or did they have to be raised by
4 Mr Ward?

5 A. They were raised by Mr Ward or someone in the
6 Casework Management Team.

7 Q. You'll see that in his second paragraph he says:
8 "... please conduct a thorough examination
9 ... in general with a view to refuting the
10 postmaster's allegation that there is a fault
11 ..."

12 A. Yes.

13 Q. I think you would probably agree that that's not
14 really the open minded way that disclosure
15 requests ought to be settled, is it?

16 A. I agree, and that's not what my intention was
17 for getting information because -- because I'd
18 got prior knowledge of Horizon in my previous
19 role. If there was something wrong, it needed
20 to be resolved. So it wasn't a case from my
21 mindset that I was looking to refute Mr Thomas'
22 allegations. I wanted to know what caused the
23 shortage.

24 Q. Because you've told us in your witness statement
25 that you would seek evidence with an open mind

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1 that might support the Post Office's case but
 2 equally might assist the suspect, Mr Thomas?
 3 **A.** Yes, and that was one of the reasons why
 4 I didn't think it was appropriate to reopen the
 5 Post Office with the same equipment, because if
 6 it was the equipment, then all you're doing is
 7 passing a potential problem on to somebody else
 8 that might experience the same situation and the
 9 same losses and outcomes, and, you know,
 10 I didn't think that was appropriate.

11 **Q.** In any event, this request is raised on the
 12 24 October 2005 and we've seen the emails that
 13 reflect, to some extent, the request that was
 14 made.

15 Can we turn to your investigation report,
 16 please, at POL00044861. So the ARQ requests
 17 that we were just looking at was 24 October, and
 18 I think we can see, if we go to page 7, this is
 19 signed off by you on 25 October, the next day,
 20 yes?

21 **A.** Yes. Can I just add, I've not had sight
 22 previously of this particular document. I don't
 23 know if this was one that was forwarded to me
 24 this week that I've not had a chance to review,
 25 but the only one I've seen is the one that was

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1 PIN pad terminal and enters an incorrect PIN
 2 number.

3 "[2] A customer requests a withdrawal but no
 4 funds are present in their account.

5 "[3] A customer has previously entered
 6 an incorrect PIN on 3 separate occasions and the
 7 card provider blocks the transaction.

8 "[4] The card has been reported stolen and
 9 the card has been cancelled.

10 "[5] The transaction does not receive online
 11 authorisation from the card provider even with
 12 the correct PIN entered.

13 "If Mr Thomas has paid out funds in respect
 14 of the above transactions and a loss occurred
 15 then this is down to incompetence and not the
 16 failings of the Horizon system."

17 Now, this was written by you, prior to the
 18 receipt of any of the ARQ data, wasn't it?
 19 Indeed, it was written only a day after the
 20 request was made.

21 **A.** Yes.

22 **Q.** How did you determine that there were five
 23 reasons for nil transactions?

24 **A.** I was -- I can't remember exactly how I came to
 25 that assumption. I think it was just from my

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1 for the discipline manager.

2 **Q.** Yes, that's what this document is. This was
 3 sent to you with your original Rule 9 Request
 4 a couple of months ago.

5 **A.** Right. Okay.

6 **Q.** If we go back to page 1, please. You can see
 7 it's "Personnel", it's the discipline one I'm
 8 asking about at the moment.

9 **A.** Right, okay.

10 **Q.** You'll see that it relates to Noel Thomas, it
 11 sets out his service and then, bottom of the
 12 page:

13 "These papers refer to an audit shortage at
 14 [the post office] on Thursday, 13 October 2005."

15 If we go forwards, please, to page 6, and
 16 four paragraphs in you say:

17 "Mr Thomas is convinced that the Horizon
 18 system is affecting his balance results, as the
 19 Online Banking summary contains several zero
 20 totals."

21 Then you say:

22 "There are a number of legitimate reasons
 23 why a zero entry would be present on the
 24 summary.

25 "[1] A customer places their card into the

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1 knowledge of the system.

2 **Q.** What enquiries, training or knowledge did you
 3 rely on to say that there were five reasons,
 4 legitimate reasons, for zero entries?

5 **A.** I can't remember what prompted me to write that,
 6 in terms of getting information. I may have
 7 made some phone calls. I may have taken some
 8 advice. I can't recall.

9 **Q.** Were you saying these were the only five
 10 reasons?

11 **A.** No.

12 **Q.** Well, if there were more than five reasons,
 13 potentially, why did you only list these five?

14 **A.** Because this document wasn't to facilitate any
 15 criminal proceedings or make any legal
 16 decisions. This was just where the case was at
 17 the moment, to give to Mr Hughes -- sorry, Mr --
 18 yeah, Emlyn Hughes -- in respect of where I was
 19 with the case from a discipline or make
 20 decisions on Mr Thomas' role as a subpostmaster.

21 **Q.** Well, I'd ask you to remember that answer for
 22 a little later today because what we'll see is
 23 that what you set out here does become part of
 24 the prosecution case, that these are the five
 25 reasons for legitimate nil transactions.

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1 Why didn't you wait for the results of the
2 ARQ data to come back?

3 **A.** Because it was the Post Office procedures to
4 send an interim report to the conduct manager,
5 normally within the week of the audit, or loss
6 being occurred.

7 **Q.** But why are you listing legitimate reasons for
8 zero entries being present in the audit, without
9 receipt of the ARQ data?

10 **A.** I'm hypothesising, I think, as what they could
11 be. I can't answer that because I can't
12 remember.

13 **Q.** It's written quite definitively, isn't it? Not,
14 "Amongst the reasons why a zero entry might be
15 print are the following" or "Here is
16 a non-exhaustive list". You're setting out the
17 reasons, and there are five of them, for
18 a legitimate zero entry being present, aren't
19 you?

20 **A.** I can't tell you what I was writing at the time,
21 I just know, probably from my experience on the
22 counter and through the system, these were
23 reasons I may have seen before, may have
24 experienced before, or maybe I made a phone
25 call. Any answer I give to that, I'm guessing,

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1 periods are", and then you set them out.

2 Can you see that?

3 **A.** Yes. I've not seen this document prior to now.

4 **Q.** Do you need time to read it? It's three pages.
5 Ms Matthews?

6 **A.** I'm happy for you to carry on. I'm just -- you
7 know, I haven't had prior sight of it.

8 **Q.** Can you see that the document continues:

9 "Fujitsu had no concerns with the integrity
10 of the data received from Gaerwen Post Office,
11 similarly the Horizon System Helpdesk who
12 monitor the working of the system have not been
13 alerted to any hardware problems through their
14 offsite monitoring or by any complaints raised
15 by the ... branch.

16 "I will summarise each week in detail."

17 Then you set out summary of 18 November to
18 24 November and, over the page, 19 May to
19 25 May, and then the foot of the page,
20 14 September to 12 October 2005. Then on to
21 page 3, please.

22 "In conclusion:

23 "No problems highlighted with the integrity
24 of the data or the system.

25 "All nil online banking transactions

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1 because I can't remember what forced my decision
2 making to write that. I can't remember.

3 **Q.** Can we move forwards, please, to a couple of
4 months later to look at the offender report
5 prepared for criminal investigation and
6 prosecution purposes, POL00044867.

7 If we look at page 3, please, we should, if
8 we scroll down, see a date. It's partially
9 obscured but I've checked and that's 12 December
10 2005; can you see that?

11 **A.** Yes.

12 **Q.** So this is your investigation report, and it's
13 a three-page report for the purposes of criminal
14 investigation and prosecution of 12 December
15 2005. Can we go back to page 1, please. You
16 say:

17 "The purpose of the report is to provide
18 additional information on the nil transactions
19 ... for which Mr Thomas has stated is the reason
20 for the audit shortage ... Mr Thomas claimed
21 that this loss had started some 12 months prior
22 to the audit.

23 "As requested by the Criminal Law Team,
24 I obtained and analysed 3 periods of Horizon
25 data covering a twelve-month period. The

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1 examined have valid reasons for the transactions
2 having no value attached to them.

3 "The majority of declined withdrawals with
4 nil value are immediately followed by
5 an authorised withdrawal for various amounts and
6 are undertaken by the same clerk on the same
7 terminal.

8 "The nil transactions are undertaken by both
9 Mr Thomas and Mrs Thomas on ... terminal 1 or
10 2."

11 What qualifications did you have to analyse
12 Horizon ARQ data?

13 **A.** I had no qualifications as such to do it.

14 **Q.** What training did you have to analyse ARQ data?

15 **A.** I can't remember.

16 **Q.** Did you have any training?

17 **A.** I can't remember any specific training, no.

18 **Q.** You reach a conclusion that every nil
19 transaction has a valid reason for having no
20 value attached to it.

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

22 **Q.** How did you go about determining that there were
23 no problems with the integrity of the data or
24 the system and that all of the nil transactions
25 had valid reasons for having no value?

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1 **A.** I can't remember. I remember getting the disk
2 and opening it up and, again, looking for
3 certain transactions and what happened next
4 after the transactions. So you could -- if
5 I remember correctly, it may have been coded.
6 So you're looking for what happened before and
7 after. I mean, I can't really say with any
8 surety what happened, what I did.
9 **Q.** Was it usual for investigators to carry out
10 their own self-analysis of Horizon raw data?
11 **A.** This was the first one that I remember
12 undertaking and I think --
13 **Q.** Did you speak to any other Investigators to say,
14 "Look this is my first one, I've got reams and
15 reams of ARQ data. What do I do with it? Do
16 I analyse it and offer my own opinion on what it
17 shows and doesn't show?"
18 **A.** With this case, this was one of my first cases,
19 so I was mentored quite closely with undertaking
20 this one. So I can only presume that I wasn't
21 the only person involved in it.
22 **Q.** Can we move on, please, and look at what
23 happened next in relation to Gareth Jenkins.
24 Can we just look at what you say in your witness
25 statement first, please, about Mr Jenkins.

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1 from the documents this was Brian Pinder.
2 I think Gareth Jenkins was a Fujitsu expert on
3 Horizon and Penny Thomas was the contact for
4 obtaining Horizon data. I have never met Gareth
5 Thomas or Penny Thomas and my interaction with
6 them was regarding their witness availability.
7 All other requests were made via the Casework
8 Management Team who would be the interface into
9 all requests made to Fujitsu."

10 Does that remain the case, that you had
11 not -- your recollection is that you'd not met
12 Gareth Thomas -- sorry --

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

14 **Q.** -- I think you mean Gareth Jenkins there.

15 **A.** I've been calling him all sorts. I don't
16 remember him specifically.

17 **Q.** Then lastly, page 98 -- sorry, paragraph 98, at
18 the foot of the page:

19 "With regards to the request for a statement
20 from Gareth Jenkins, I would have asked the
21 Casework Team for a statement regarding the
22 Fujitsu involvement and it would be the Casework
23 Management Team who would go via their agreed
24 channels and obtain this, with Gareth Jenkins
25 offered by Fujitsu as their subject matter

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1 Firstly, page 31, paragraph 90, you say:

2 "From my recollection, I did not have any
3 direct communication with Penny Thomas or Gareth
4 Edwards ..."

5 I think you mean Gareth Jenkins there, don't
6 you --

7 **A.** Sorry, yes.

8 **Q.** -- rather than the Rugby International?

9 "... apart from to manage them as witnesses
10 in the case, for example dates to avoid, dates
11 required in court, etc."

12 Having looked at emails now, do you now know
13 that that's incorrect, that you did have direct
14 communications with both Penny Thomas and Gareth
15 Jenkins?

16 **A.** Yes. However, I haven't -- as I explained
17 earlier, I haven't had time to go through, word
18 by word, every document you sent me because of
19 the time restraints. But I can see that I did
20 have some liaison with them but I don't recall
21 it.

22 **Q.** Then page 33, please, at paragraph 97. You say:

23 "I have been asked to consider [some
24 documents]. I recall meeting somebody at the
25 post office to remove the equipment and presume

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1 expert. I was not involved in this process
2 apart from [asking] for a statement."

3 Does that remain your recollection?

4 **A.** Yes.

5 **Q.** Can we look at some contemporaneous materials
6 and the drafts of witness statements attached to
7 emails, which indicate that both Graham Ward,
8 the Casework Manager, and you, were involved in
9 reviewing and drafting parts of Mr Jenkins'
10 witness statement. Can we start, please, with
11 FUJ00152587. Can we go to page 4, please -- in
12 fact, maybe if we start at page 5., thank you.

13 Can we see that on 22 March, Mr Ward emails
14 Brian Pinder --

15 **A.** Yes.

16 **Q.** -- copying in Neneh Lowther and Penny Thomas:
17 "Brian

18 "I'll get back to you once I have confirmed
19 whether we need these statements or not ...

20 "Can I also take this opportunity to clarify
21 our requirements in respect of the Gaerwen
22 statement. In this case the subpostmaster is
23 blaming Horizon for his losses claiming that for
24 various banking related transactions the counter
25 desktop records amounts entered for payment but

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1 then shows 'Nil' when the transaction log is
 2 printed, and it is this that we need to refute.
 3 "Various emails passed between myself and
 4 your team on this matter and the reply below
 5 ..."
 6 We have looked at those, the October '05
 7 emails. He continues:
 8 "Nil transactions could also be caused by
 9 errors in PIN pad, counter, agents or host code
 10 depending on what constitutes a 'nil
 11 transaction'. This cannot be determined without
 12 access to the appropriate logs.
 13 "Penny also sent with the respective ARQ
 14 data, additional spreadsheets which showed all
 15 'Nil' transactions for the periods.
 16 "We therefore require of the usual statement
 17 producing the Transaction and Event logs (Penny
 18 has sent me a draft and I have suggested one or
 19 two minor amendments). We will also need the
 20 above spreadsheets produced by whoever put them
 21 together, explaining the headings and under what
 22 circumstances 'Nil' transactions can occur.
 23 Finally, 'to cover all the angles' I would also
 24 like to produce the call logs during the entire
 25 period ... so we can see whether the postmaster

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1 **A.** I probably would have had some involvement in
 2 that. From my recollection, it also went to the
 3 Criminal Law Team.
 4 **Q.** Was Mr Ward a manager of yours?
 5 **A.** He wasn't a direct manager of mine, no. He
 6 worked in, obviously, another function of the
 7 same team.
 8 **Q.** Were there any reporting lines between you and
 9 Mr Ward?
 10 **A.** No.
 11 **Q.** What was the division of labour between Mr Ward
 12 and you in relation to obtaining witness
 13 statements from Fujitsu in Mr Thomas' case, as
 14 far as you can remember?
 15 **A.** As far as I remember, they did it.
 16 **Q.** Who is the "they"?
 17 **A.** The Casework Manager team and Fujitsu. I don't
 18 recall much interaction with them at all.
 19 **Q.** Can we go back to page 4, please, and then
 20 scroll down. If we just look at the bottom of
 21 that email from Ms Lowther to Mr Ward, and then
 22 scroll onto the next page:
 23 "Graham,
 24 "Please see the draft [witness statement]
 25 for the above re 'Nil transactions'. Could you

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1 ever reported this alleged fault with the system
 2 ... a statement similar to the Bill Mitchell
 3 statement ... will be ideal."
 4 So this is the Post Office, through Mr Ward,
 5 asking Fujitsu, through Mr Pinder, for a witness
 6 statement fulfilling these functions, agreed?
 7 **A.** Yes.
 8 **Q.** Was there any formal process that you were aware
 9 of at this time by which such a request could be
 10 made?
 11 **A.** No.
 12 **Q.** Again, it was dealt with, person to person, by
 13 email; is that right?
 14 **A.** It -- I didn't know how Graham did it, if I'm
 15 being honest. It was just I -- a statement was
 16 needed and he was the liaison point in.
 17 I didn't know whether he met them. I didn't
 18 know whether it was via email. I didn't know.
 19 **Q.** Who was responsible for managing requests for
 20 witness statements from Fujitsu?
 21 **A.** The Casework Manager.
 22 **Q.** That's Mr Ward?
 23 **A.** Yes, or one of his team.
 24 **Q.** Who had responsibility for assisting with any
 25 drafting, reviewing and finalising a statement?

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1 see if this meets your requirements."
 2 So this is 23 March, Ms Lowther forwarding
 3 an email or replying to Mr Ward's email, and
 4 then if we go up the page, please, and scroll
 5 up, reply from Mr Ward:
 6 "The layout is presumably unfinished,
 7 paragraph spacings, etc?
 8 "As per my earlier email, and more
 9 importantly the 3 spreadsheets sent with ARQ
 10 data need to be produced as ... exhibits.
 11 "Also, the line which begins at the foot of
 12 the page ... appears unfinished?"
 13 Then this:
 14 "And I'm concerned at the words 'system
 15 failure' which is also in an earlier line ...
 16 'There has been some sort of system failure' --
 17 What does this mean exactly and is there any
 18 indication of a system failure at this office
 19 during the period in question?"
 20 Then if we go up, please, a page. Just
 21 scroll a little bit more, please, thank you.
 22 We'd better stop there, thank you.
 23 Let's look at the draft statement that was
 24 included and about which Mr Ward was concerned
 25 by the use of the words "system failure",

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1 FUJ00122204. So it's in the name of Mr Jenkins.
 2 If we scroll down, please, he introduces himself
 3 in the first paragraph and then he says:
 4 "There are three main reasons why a zero
 5 value transaction may be generated as part of
 6 the banking system:
 7 "1. The transaction has no financial effect
 8 (ie a Balance Enquiry or a PIN change]
 9 "2. The transaction has been declined by
 10 the bank.
 11 "3. There has been some sort of System
 12 Failure. Such failures are normal occurrences."
 13 That third paragraph that Mr Jenkins
 14 includes in this draft of his statement, can we
 15 call that the system failure reason,
 16 Ms Matthews, to summarise it rather than reading
 17 it out?
 18 **A.** Okay, yes.
 19 **Q.** That's the thing that Mr Ward was concerned
 20 about, agreed?
 21 **A.** Agreed, yes.
 22 **Q.** Can we go, please, to the next email in the
 23 chain, FUJ00122203. If we scroll to the foot of
 24 the page, thank you, an email from Neneh Lowther
 25 to Mr Jenkins:

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1 properly, or if not, any respect in which it was
 2 not operating properly, or was out of operation
 3 was not such as to effect the information held
 4 on it.
 5 "Any records to which I refer in my
 6 statement form part of the records relating to
 7 the business of Fujitsu Services. [They] were
 8 compiled in the ordinary course of business from
 9 information supplied by persons who have or may
 10 reasonably be supposed to have personal
 11 knowledge of the matter dealt with in the
 12 information supplied, but are unlikely to have
 13 any recollection of the information or cannot be
 14 traced. As part of my duties, I have access to
 15 these records."
 16 Then Mr Jenkins has typed:
 17 "I am not sure the yellow bit is true. Can
 18 this be deleted? All I've done is interpret the
 19 data in spreadsheets that you have emailed to
 20 me."
 21 So if we take into account the email that we
 22 just looked at and this attachment to it, would
 23 you agree that Mr Jenkins was saying, "I can't
 24 include those two yellow paragraphs because I'm
 25 not sure they're true, can they be taken out,

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1 "Hi Gareth,
 2 "I have updated your [witness statement]
 3 with the column headings", et cetera.
 4 Then scroll up -- thank you, bit more --
 5 Mr Jenkins to Ms Lowther and Mr Pinder:
 6 "Neneh,
 7 "I've annotated it with Revisions.
 8 "In particular, I don't feel I can include
 9 the last two paras, which may make the statement
 10 useless."
 11 So remember that:
 12 "I don't feel I can include the last two
 13 paras, which may make the statement useless."
 14 Let's look at the statement, please,
 15 FUJ00122204. Then go to page 3 and scroll
 16 a little bit. Can you see that there is
 17 a passage apparently highlighted, which consists
 18 of two paragraphs, which I think are the last
 19 two paragraphs that Mr Jenkins was referring to.
 20 Originally, it said:
 21 "There is no reason to believe that the
 22 information in this statement is inaccurate
 23 because of the improper use of the computer. To
 24 the best of my knowledge and belief at all
 25 material times the computer was operating

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1 please?"
 2 **A.** That's how it reads to me, yes.
 3 **Q.** What impact do you think that had on the balance
 4 of what Mr Jenkins was saying, that he felt
 5 unable to say that there was no reason to
 6 believe that the information in the statement is
 7 inaccurate because of improper use of the
 8 computer?
 9 **A.** I don't know what he's trying to say in that
 10 statement because it seems to contradict itself.
 11 So I don't know because I've not seen that
 12 statement before.
 13 **Q.** Looking at it now, do you think this is
 14 significant, that --
 15 **A.** Yes --
 16 **Q.** -- the expert from Fujitsu is unwilling to sign
 17 a statement or have included in a signed
 18 statement a paragraph which says, "To the best
 19 of my knowledge and belief, the computer was at
 20 all material times operating properly?"
 21 **A.** What concerns me is he's written that and then
 22 put the caveat at the bottom "I'm not sure the
 23 yellow bit is true".
 24 **Q.** And "Can it be deleted please"?
 25 **A.** That's -- I've not seen that before, and

84

1 that's --

2 **Q.** Is that very worrying?

3 **A.** It's very concerning, yes. That takes away from

4 the whole point of getting a statement.

5 **Q.** Do you recall seeing this draft of the

6 statement, the 23 March 2006 draft?

7 **A.** I don't recall having sight of that, no. That

8 doesn't look familiar to me and, if I'd have

9 seen that, I would have raised concerns over it.

10 **Q.** What about the bit on page 1, if we go back to

11 that, and scrolling down. Do you remember this

12 part of it, where Mr Jenkins is saying one of

13 the reasons, the three main reasons, why a zero

14 value may be generated is that there has been

15 some sort of system failure and that such

16 failures are normal occurrences?

17 **A.** I don't recall reading this statement.

18 **Q.** That would have been new information to you,

19 wouldn't it?

20 **A.** Yes.

21 **Q.** It would very significant information to you,

22 wouldn't it?

23 **A.** It would have been, as a system failure, yes.

24 **Q.** Taken together with the fact that Mr Jenkins

25 wasn't prepared to sign a statement which said,

85

1 its own draft of the witness statement:

2 "... (as mentioned previously I think the

3 'system failure ... normal occurrence' line is

4 potentially very damaging). It may be worth

5 considering someone from our team taking

6 a statement directly from Gareth (where is he

7 based?)

8 "Whilst there is some urgency with this, it

9 is more important to get it right and ensure we

10 are not embarrassed at court, which we certainly

11 could be if we produced a statement accepting

12 'system failures are normal occurrences'."

13 So, to be clear, what's happening here, the

14 Post Office Casework Manager is amending a draft

15 witness statement from the Fujitsu expert --

16 agreed --

17 **A.** Agreed.

18 **Q.** -- and is expressing concern that the expert's

19 mention of system failures being a cause and

20 system failures being a normal occurrence is

21 damaging -- damaging to the Post Office -- and

22 potentially embarrassing for it, agreed?

23 **A.** Agreed.

24 **Q.** If we go further up the page, thank you,

25 Ms Lowther forwards that email and the new draft

87

1 "To the best of my knowledge and belief, the

2 computer was at all material times operating

3 properly", that would be very concerning?

4 **A.** It would be, yes.

5 **Q.** Can we go forwards a day, please, to 24 March

6 2006, FUJ00122217. Can we start, please, at

7 page 2. This is when Fujitsu send what we've

8 just looked at back into the Post Office. Top

9 email:

10 "Hi, Graham,

11 "Please see attached [so this is Ms Lowther

12 to Mr Ward] second draft for the above with the

13 further explanation regarding the issues you

14 raised. Please let me know of any amendments

15 ASAP as we need to put this in the post to you

16 by lunchtime ..."

17 Then if we go to page 1, please, foot of the

18 page, Mr Ward replies to Ms Lowther and you're

19 now copied in. Can you see that?

20 **A.** Yes.

21 **Q.** "Neneh, this statement needs more work. I've

22 attached a suggested draft with a number of

23 comments ..."

24 So, to be clear, what's happening here is

25 the Post Office is going back to Fujitsu with

86

1 to Mr Jenkins:

2 "Please see the email below and the new

3 draft statement."

4 Let's look at the statement as it then

5 stood, ie after the Post Office had amended it.

6 FUJ00122218. If we go to page 2, please, and

7 scroll down, please. Thank you.

8 So the section between "Should be

9 spreadsheets" and "declined by the Bank" is all

10 Mr Jenkins, as in the original. Then the next

11 sentence has been added in by Mr Ward in the

12 brackets. I wonder whether this could be

13 highlighted:

14 "(This is a really poor choice of words

15 which seems to accept that failures in the

16 system are normal and therefore may well support

17 the postmaster's claim that the system is to

18 blame for the losses!!!!)"

19 Can you see that the two reasons that

20 Mr Jenkins gave in his first draft of the

21 witness statement are included, "transactions

22 had no financial effect", "transaction has been

23 declined by the bank" -- yes --

24 **A.** Yes.

25 **Q.** -- and the third one, "system failure", has been

88

1 deleted?

2 **A.** Yes.

3 **Q.** So the Post Office is deleting passages from

4 a witness statement suggesting that there may be

5 a system fault causing the loss that the

6 postmaster was pointing to, agreed?

7 **A.** Agreed.

8 **Q.** And the Post Office is suggesting that it be

9 deleted because it may well support the

10 postmaster's claim, agreed?

11 **A.** Agreed.

12 **Q.** As an Investigator, would you regard it as

13 appropriate or inappropriate to delete passages

14 from an expert's witness statement and set out

15 your own view of events?

16 **A.** I think it's -- they're an expert for a reason.

17 That's their opinion. I don't know whether

18 Mr Ward was looking at the terminology used or

19 the actual basis behind it but, either way, it's

20 somebody's statement and it has to be their

21 words and it has to be true.

22 **Q.** Then if we go to page 3, please, and just pan

23 out a little bit, please. You'll see that the

24 usual operation of the computer parts have been

25 deleted from the statement, can you see that?

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1 **Q.** But, in any event, what we can see is the Post

2 Office here expunging from the draft witness

3 statement, the "it might be the system that's at

4 fault" reason for the nil transactions, and

5 expunging from the witness statement the

6 paragraphs which Mr Jenkins said he didn't want

7 included, saying that "I've no reason to believe

8 that the system was other than working

9 correctly", agreed?

10 **A.** Yes.

11 **Q.** Can we move forwards, please, FUJ00122217.

12 We see on 28 March Mr Jenkins replying back

13 to Ms Lowther and Mr Ward, you're not included

14 on this:

15 "I've added some further annotations to your

16 annotations. Does this move us forward?"

17 Let's look at the draft, please, it's the

18 one we were just looking at, FUJ00122218, and

19 page 2. Scroll down, scroll down.

20 So, after the part in brackets, "This is

21 a really poor choice of words", written by

22 Mr Ward, Mr Jenkins replies, and I wonder if

23 this can be highlighted:

24 "Please can you suggest something better

25 then? What we have here are genuine failures of

91

1 Remember those two paragraphs that Mr Jenkins

2 said that he was uncomfortable including have

3 gone from the statement.

4 **A.** Yes.

5 **Q.** So Mr Jenkins had said, "I'm uncomfortable with

6 these, can they be deleted", and it looks as if

7 Mr Ward has indeed deleted them.

8 At the time, you were being put on notice by

9 Fujitsu that system failures were one of the

10 three main causes of nil transactions, agreed?

11 **A.** From that statement, yes, but I don't recall

12 that. I can't remember that. But it was

13 always -- you know, if somebody had raised it as

14 an issue, then it's always a possibility.

15 That's their belief as to what's happened.

16 **Q.** Would you agree with Mr Ward that the system

17 failure reason was simply a really poor choice

18 of words by Mr Jenkins or was it, in fact,

19 something much more fundamental than that? It

20 was actually a witness saying, "There is

21 a reason related to the system that may explain

22 the loss of which we're accusing this

23 subpostmaster"?

24 **A.** I don't know the context in which it was

25 written. I can't really comment on that.

90

1 the end-to-end system which are not part of

2 normal operation, but are anticipated and the

3 system is designed to cope with them. Such

4 failures could be engineered as part of

5 a malicious attack (but that doesn't apply to

6 those failures that appear in the evidence

7 presented). In all cases the system is designed

8 to identify such failures and handle them in

9 a way that the customer, the postmaster, Post

10 Office Limited and the FIs are all clear as to

11 the status of the transaction and any necessary

12 financial reconciliation takes place. I guess

13 one option is to delete the paragraph since it

14 is purely an introduction to the following more

15 detailed description."

16 Thank you. Can you recall receiving this

17 updated statement from Mr Ward when it was sent

18 to him?

19 That can come down, thank you.

20 **A.** I don't recall, I don't recall seeing it, no.

21 **Q.** Would it have been normal, given that you were

22 the Investigator in the case, to have received

23 the email that I've just shown you and

24 Mr Jenkins' draft updated statement?

25 **A.** It doesn't appear to be, no. I would have

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1 expected to have seen it. My role in it was --
 2 obviously, I knew that Mr Jenkins was going to
 3 be asked to give a statement. I didn't know the
 4 intricacies around or what took place.

5 **Q.** Can we move forwards, please, FUJ00152587. Just
 6 to check where we are, if we go to page 2. The
 7 email we've just looked at, Jenkins to Ward and
 8 Lowther. "I've added some further annotations
 9 ... does this move us forward?"

10 Then if we go to page 1, please. That is
 11 sent on by Mr Ward to Mr Pinder, copied to
 12 Ms Lowther and Mr Jenkins, and he, Mr Ward,
 13 says:

14 "I do not understand why this statement,
 15 which was originally requested on 10 March is
 16 taking so long to be put together. I appreciate
 17 it is slightly unusual, but I do not understand
 18 the confusion as I thought I'd made our
 19 requirements clear.

20 "Unfortunately, Gareth's annotations do not
 21 take us forward at all (and I'm sure this not
 22 Gareth's fault). Gareth has indicated in the
 23 attachment below that the 3 spreadsheets
 24 produced by your team (which show the 'NIL'
 25 transactions ...) were not produced by him,

93

1 these requirements in one statement?"

2 Were you the Investigator dealing with the
 3 case that Mr Ward is referring to there?

4 **A.** The Gaerwen one, yes.

5 **Q.** Did Mr Ward discuss with you what are described
 6 as the Post Office's requirements for the
 7 contents of the witness statement?

8 **A.** I have no recollection of that, no.

9 **Q.** Can you otherwise recall the Post Office's
 10 requirements in relation to the statement that
 11 the Post Office was requesting from Fujitsu in
 12 relation to nil transactions?

13 **A.** That -- the parameters that I would expect in
 14 a statement would be to do with the ARQs and the
 15 obtaining of them.

16 **Q.** This is talking about the Post Office's
 17 requirements for the content of a witness
 18 statement, isn't it, not about the ARQ?

19 **A.** Yes, but I wasn't aware of this.

20 **Q.** Can we look, please, at FUJ00155721. Can we see
 21 at the top of the page, an email exchange within
 22 Fujitsu:

23 "I have arranged for Diane to meet with
 24 Gareth at 11.00 on Thursday [the 4th] to record
 25 the statement. She has already had sight of the

95

1 therefore as he quite rightly points out, he is
 2 not in a position to produce them in his
 3 statement. He also points out there are
 4 differences in the headings, which I wasn't
 5 aware of.

6 "As already stated, we urgently need
 7 a statement producing these 3 additional
 8 spreadsheets, explaining in general terms, under
 9 what circumstances 'nil' transactions occur and
 10 in particular how the 'nil' transactions at
 11 Gaerwen occurred (as detailing on the
 12 spreadsheet). The same statement needs to
 13 included a paragraph which states that there is
 14 no evidence of a system error at Gaerwen
 15 (assuming this is the case) in relation to the
 16 'nil' transactions at the office. We do not
 17 need to mention 'system failures being normal
 18 occurrences' if there is no evidence of such a
 19 problem at this office.

20 "As I've indicated on an earlier email, it
 21 may now be best if the investigator dealing with
 22 this case arranges to meet Gareth to take the
 23 statement in person ... Can you confirm that you
 24 fully understand our requirements to ensure
 25 Gareth ... is in a position to 'tie up' all

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1 statement and comments which Gareth can provide
 2 so it shouldn't take too long. Once she has
 3 done this I thought it would be nice to
 4 introduce her to the Security team, show her
 5 around the audit room to see how we do things
 6 and then perhaps a few minutes open forum to
 7 discuss all aspects of the prosecution service.

8 "She may also bring another member of the
 9 Investigation Team along which will all help to
 10 oil the wheels when requests come in."

11 Did you attend a meeting with Mr Jenkins for
 12 the purposes of taking a witness statement from
 13 him?

14 **A.** I don't recall any of that, no. I just don't
 15 recall. I don't recall meeting him.

16 **Q.** An email sent on Saturday, 1 April 2006,
 17 referring to Thursday, would be referring to the
 18 6 April, just by looking at a calendar, okay?

19 **A.** Yeah.

20 **Q.** How many times in your four years as
 21 an Investigator did you attend Fujitsu's
 22 offices?

23 **A.** I remember attending once and I thought it was
 24 to do with the hardware equipment at the office.

25 **Q.** Do you recall attending --

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1 A. I can't --
 2 Q. -- sorry -- to speak with a Fujitsu employee
 3 face to face, to take a witness statement from
 4 them?
 5 A. I can't remember.
 6 Q. Do you now recall attending and taking --
 7 A. No.
 8 Q. -- a witness statement on 6 April 2006 --
 9 A. *(The witness shook her head)*
 10 Q. -- with Mr Jenkins at Fujitsu's office?
 11 A. I can't remember. I know I've been -- I think
 12 it was in Reading, and I know I've been on one
 13 occasion. I seem to think it was to do with the
 14 equipment that was being checked because I asked
 15 for it to be checked, but I can't recall.
 16 Q. Can we look, please, at FUJ00122237. We can see
 17 a witness statement dated 6 April 2006 from
 18 Mr Jenkins. If we scroll down you can see what
 19 he says. Just read that slowly. Then go over
 20 the page, please, and then scroll down, and then
 21 scroll down, keep going. Just stopping there.
 22 Then read carefully the last paragraph:
 23 "There is no reason to believe that
 24 information in the statement is inaccurate ...
 25 To the best of my knowledge and belief at all
 97

1 says that the system was operating at all times
 2 properly has been overcome, hasn't it?
 3 A. It appears to be, yes.
 4 Q. How has that come about?
 5 A. I don't know because I don't remember. I don't
 6 even remember taking that statement.
 7 Q. Would you accept, on the basis of the documents
 8 that we've looked at, that it appears that the
 9 Post Office sought to harden up Mr Jenkins'
 10 witness statement?
 11 A. It appears that they go in self-preservation
 12 mode, by the sound of it.
 13 MR BEER: Sir, might that be an appropriate moment
 14 to break for lunch?
 15 SIR WYN WILLIAMS: Yes, certainly.
 16 MR BEER: I wonder whether we can take a slightly
 17 shorter lunch, given the earlier finishing time
 18 today, and reconvene at 1.30?
 19 SIR WYN WILLIAMS: Subject to any representations
 20 from the transcriber, yes.
 21 MR BEER: She's saying fine, thank you.
 22 SIR WYN WILLIAMS: Fine. So 1.30, then.
 23 MR BEER: Thank you very much, sir.
 24 (12.43 pm)
 25 (The Short Adjournment)
 99

1 material times the computer was operating
 2 properly ..."
 3 Then over the page, that's the end of it.
 4 So having looked at the email
 5 correspondence, having looked at the comments in
 6 the email correspondence and the process of
 7 travelling drafts of Mr Jenkins' witness
 8 statement and having looked at that last signed
 9 version of the witness statement, can you see
 10 that, firstly, Mr Jenkins originally said that
 11 an explanation for the nil transactions may be
 12 a Horizon system fault and that that has been
 13 taken out of his signed witness statement?
 14 A. Yes.
 15 Q. Secondly, he said that he was unprepared to sign
 16 a witness statement saying that, at all material
 17 times, the Horizon system was operating
 18 properly, but that has been added back in to his
 19 witness statement. Can you see that? It's the
 20 last paragraph, we just read.
 21 A. Yes. Sorry, yes.
 22 Q. So the passage indicating that it might be
 23 a system fault has evaporated, hasn't it?
 24 A. Yes.
 25 Q. And his unwillingness to sign a statement which
 98

1 (1.30 pm)
 2 MR BEER: Good afternoon, sir. Can you see and hear
 3 me?
 4 SIR WYN WILLIAMS: Yes, thank you.
 5 MR BEER: Ms Matthews, can you see and hear me?
 6 A. Yes.
 7 Q. Good afternoon.
 8 We saw, before lunch, that Mr Thomas had
 9 said that the balances were affected by a series
 10 of Horizon generated zero lines, that Fujitsu
 11 were approached, and a witness with expertise
 12 had said that the system errors within Horizon
 13 were capable of generating zero lines and that,
 14 through an exchange of emails and other
 15 communications, that evidence was edited out of
 16 the final statement served by Mr Jenkins,
 17 agreed?
 18 A. Yes.
 19 Q. I want to turn to how the case was presented in
 20 court, then, please. Can we start, please, with
 21 POL00044885. Do you remember these kinds of
 22 documents, a summary of facts prepared in
 23 accordance with that rule of the Magistrates
 24 Court rules?
 25 A. Yes.
 100

1 Q. Can you remember what the purpose of the summary
 2 of facts were or was?
 3 A. I believe it was just to give a synopsis of the
 4 case to the -- I think it went to the
 5 prosecuting solicitor who was attending court.
 6 I'm not sure if it went to the defence. I don't
 7 know.
 8 Q. Who drew these up?
 9 A. It would have been the Criminal Law Team.
 10 Q. So, in this case, it would be Juliet McFarlane;
 11 is that right?
 12 A. Yes.
 13 Q. I think we can see from the foot of the page, if
 14 we keep scrolling, that this appears to have
 15 been saved in a member of the Criminal Law Team,
 16 Juliet McFarlane's, work folders; can you see
 17 that?
 18 A. Yes.
 19 Q. Do you know whether this was served on the
 20 court?
 21 A. I don't know.
 22 Q. In any event, can we go to page 2, please. At
 23 the foot of the page, the document has
 24 summarised what Mr Thomas had said interview,
 25 and then says this:

101

1 Legal team actually got the discipline report.
 2 I'm not sure. But it does look the same, yes.
 3 Q. You remember this morning I said to remember
 4 that?
 5 A. Yes.
 6 Q. That was for now. So they've lifted, in the
 7 document -- we know that this is disclosed to
 8 defendants and presented to the court, that's
 9 what the Magistrates Court rules say -- your own
 10 summary of the five legitimate reasons for
 11 a zero entry appearing in an online summary?
 12 A. Yes.
 13 Q. What we don't see is Mr Jenkins' expression in
 14 the course of the early drafts of his witness
 15 statement, the fact that it may be a system
 16 error, do we?
 17 A. No.
 18 Q. Do you know how that's come about?
 19 A. I don't have any dealings in the presentation of
 20 this document or in the drafting of it.
 21 Q. We can take the document down, please. What was
 22 the process or practice of the communication of
 23 information, the like of which we've just seen
 24 in the emails just before lunch, from the
 25 Investigator to the Criminal Law Team?

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1 "There are a number of legitimate reasons
 2 why a zero entry might be presented on an online
 3 summary. These may be because:
 4 "1. A customer enters an incorrect PIN
 5 number.
 6 "2. A customer that is no funds in their
 7 account.
 8 "3. An incorrect PIN number is entered on 3
 9 separate occasions.
 10 "4. The card has been stolen or cancelled.
 11 "5. The transaction is unauthorised.
 12 "Horizon data showing nil transactions have
 13 been analysed over a specified period between
 14 November 2004 and October 2005. Fujitsu had no
 15 concerns regarding the integrity of the data
 16 received from Gaerwen Post Office. Further the
 17 Horizon System Helpdesk had not been alerted to
 18 any hardware problems."
 19 Can you see that, at the foot of page 2 and
 20 the top of page 3 there, the so-called
 21 legitimate reasons why a zero entry might appear
 22 on an online summary is lifted from your report
 23 for the purposes of disciplinary proceedings,
 24 that we looked at this morning?
 25 A. It looks the same, yes, but I wasn't sure the

102

1 A. Sorry, in respect of what?
 2 Q. So we've seen that there were email exchanges,
 3 there were at least three iterations of
 4 a witness statement from Mr Jenkins; what was
 5 the process for disclosing/communicating that
 6 kind of information to the Criminal Law Team?
 7 A. I would have presumed that, if them documents
 8 would have been available to me, I would have
 9 disclosed them to the prosecution lawyer --
 10 sorry, to the Criminal Law Team. However,
 11 I would have expected the Casework Team to have
 12 forwarded their documentation on to the Criminal
 13 Law Team for consideration.
 14 Q. We've seen that, in some cases, you were in
 15 possession of the material, because you were
 16 a copyee on the email chains?
 17 A. On one. I don't even recall looking at that,
 18 but there were several more, and I would have
 19 expected the Casework Manager or the Management
 20 Team to have forwarded them on.
 21 Q. Why would you expect Mr Ward to forward those to
 22 the Criminal Law Team when you were the Officer
 23 in the Case, essentially, the Investigator?
 24 A. Because some of them I didn't even have sight
 25 of.

104

1 Q. That's why I'm asking what the process was. Was
2 it the case that somebody like Mr Ward had
3 a duty to fulfil disclosure obligations himself
4 directly to the Criminal Law Team or would he
5 provide material back to you?

6 A. I don't know what the process was at that time.
7 I don't think there was any structured process
8 when it came to dealing with Fujitsu because it
9 was a new area. I certainly wasn't aware of
10 what any set procedure would have been, in
11 regards to the communication between Fujitsu and
12 the Casework Team, but I wouldn't have expected
13 there to be documents and statements that I was
14 unaware of.

15 Q. I mean, this example we're looking at does
16 relate to Fujitsu but it need not relate to
17 Fujitsu. Mr Ward or another member of the
18 Casework Team could be having communications
19 with any witness?

20 A. Yes.

21 Q. What was the process for ensuring that material
22 created in the course of the investigation was
23 collected together by the Disclosure Officer and
24 passed to the prosecutor?

25 A. I don't recall what the process was.

105

1 Material Schedule?

2 A. Yes.

3 Q. Can you help as to whether that occurred in this
4 case or not?

5 A. I didn't do it because I didn't know of their
6 existence but anything that happened after my
7 documentation had gone into the Criminal Law
8 Team -- and it happened on a few other
9 occasions, not with the case that we're going to
10 talk about today -- then the material would be
11 added by the Criminal Law Team onto the
12 schedules, and then disclosed.

13 Q. We discussed earlier your initial analysis of
14 the ARQ data, which you said you analysed to
15 look for anomalies and patterns, and I asked you
16 about what training and experience you had in
17 analysing ARQ data to look for anomalies and
18 patterns. Did you, when you were undertaking
19 that work, record what you did?

20 A. It was a document, I think there was like a log,
21 but I certainly made an entry in my notebook to
22 say what I'd done.

23 Q. Would that be --

24 A. I can't recall specific -- sorry. I can't
25 recall specifically what I did but it would be

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1 Q. Is that because there wasn't one?

2 A. I don't think there was. I can't recall ever
3 seeing one, whereby what the lines of
4 communication laid down guidelines would be,
5 with regards to the Casework Management Team.

6 Q. Does it follow that you can't say that
7 Mr Jenkins' earlier drafts of statements dated
8 23 and 24 March 2006 were provided to the
9 Criminal Law Team?

10 A. I don't know.

11 Q. Irrespective of the means by which it occurred,
12 do you accept that it was necessary for
13 Mr Thomas and the court to be informed that one
14 of the three main reasons for nil transactions
15 were system faults?

16 A. Yes.

17 Q. Did you know that the law at the time required
18 a prosecutor -- including in that
19 an Investigator -- to retain, record and
20 disclose final versions of witness statements
21 where draft versions differed materially from
22 the final version?

23 A. I presume I would have done, yes.

24 Q. So you were aware of the duty to record the
25 existence of such draft statements on an Unused

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1 recorded, what I did, and I don't know whether
2 I'd made it in my notebook or whether it was
3 a Word document, in terms of what I received and
4 how I did it. I can't recall specifically.

5 And, to be fair, I might be getting confused
6 with some analysis work that I did in Royal
7 Mail, so -- where it was recorded on logs. So
8 I can't be specific.

9 Q. Was your analysis served as used evidence?

10 A. I can't recall because I can't recall if I did
11 it.

12 Q. Does it follow --

13 A. I just can't remember what happened in that
14 moment in time, as to -- the ARQ system was
15 quite new when I asked for it. It wasn't -- and
16 I'm not sure there was even a set procedure for
17 what to do in the casework management processes.

18 Q. Does it follow that you can't say that the
19 record of your analysis and the results of your
20 analysis was served as unused material as well?

21 A. I can't -- I don't know what was served.

22 Q. Can we move on, then, to closer to the court
23 appearance, and we've seen the witness
24 statements taken from or provided by Mr Jenkins.

25 Were you treating him in your own mind at this

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1 time as an expert witness?
 2 **A.** I think I was just treating him as a witness to
 3 the case.
 4 **Q.** So not as an expert?
 5 **A.** It was never stressed to me he was an expert
 6 witness; he was just a witness in the case.
 7 **Q.** What does a witness in the case mean?
 8 **A.** He was somebody that would be able to give
 9 an account as to what had happened in
 10 a particular circumstance and --
 11 **Q.** So a witness of fact, essentially?
 12 **A.** Yes.
 13 **Q.** Would you have treated him differently if you,
 14 in your mind, were treating him as an expert
 15 witness?
 16 **A.** I don't think so because, at that point, my role
 17 was one of an administrative to ensure he was
 18 aware of the court times, hearings, location,
 19 et cetera.
 20 **Q.** But we've seen from the emails we looked at this
 21 morning that you were copied in to a draft
 22 statement and an arrangement was made for you to
 23 attend at 11.00 at Fujitsu's premises to take
 24 a witness statement from him. If you did attend
 25 on 6 April 2006 and took a witness statement

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1 at that time the actions that were taken in
 2 relation to this case were checked and, you
 3 know, put through somebody else, whether that be
 4 the second officer or my line manager at the
 5 time.
 6 **Q.** Who was your line manager at the time?
 7 **A.** Paul Dawkins.
 8 **Q.** Can we look at when the case is in court, by
 9 looking at FUJ00152616, and look at page 3
 10 please -- and scroll down, thank you.
 11 This is an email, it's dated 12 July 2006 --
 12 if we just scroll up a little bit we'll catch
 13 it, there -- from Mr Jenkins to you. He says:
 14 "Diane,
 15 "I discussed this with [somebody else] that
 16 the last two weeks in September was the best
 17 time to go away on holiday but since [something
 18 else] we'll try and arrange some other time."
 19 So there's some discussion about his holiday
 20 and leave arrangements. He says:
 21 "I understand also that the trial is
 22 Caernarfon. Do you have any idea as to how much
 23 time will be involved and what exactly is
 24 required? I've never been to court in any
 25 capacity and my knowledge of such things is

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1 from him, you would need to know, in your own
 2 mind, whether you were treating him as an expert
 3 witness or not, wouldn't you?
 4 **A.** I don't even recall taking a witness statement.
 5 **Q.** I know that you said that this morning but
 6 assume that you did, for present purposes.
 7 Would you agree that you'd have to establish in
 8 your own mind how you were treating him, what
 9 his status was?
 10 **A.** In my mind at the time, I think I just had him
 11 as a witness. I'm not sure it was specified to
 12 me that he was an SME.
 13 **Q.** If he was treated by you as an expert, can you
 14 help us as to what differently you may have
 15 done?
 16 **A.** I can't because it didn't -- I didn't do that,
 17 so I can't offer what I would have done
 18 differently. Because I don't recall how he was
 19 categorised at the time. Also, I'm not -- at
 20 that time, as I explained earlier, I was being
 21 mentored in my role, because I was quite new.
 22 So, I mean, I think that email says to bring
 23 somebody else or mentions taking somebody else.
 24 I don't know whether I did, I don't know
 25 whether I went. I can't remember. But I know

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1 based on films and TV (which I'm sure are
 2 inaccurate!)"
 3 Then can we see your reply at page 2,
 4 please -- and scroll down -- replied same day.
 5 "Hi Gareth,
 6 "Thanks for that."
 7 First couple of paragraphs are about
 8 practical arrangements, and then the third
 9 paragraph:
 10 "All witnesses will have to be present on
 11 the 1st day unless the defence has agreed their
 12 statement and don't wish to ask any questions
 13 about that evidence. It is pretty much as you
 14 see on the TV really but remember that you will
 15 have sight of your statement prior to taking the
 16 stand and can only be asked questions
 17 specifically about your statement.
 18 "A lot can happen between now and
 19 25 September as Mr Thomas' defence are still
 20 asking a lot of questions so we will wait with
 21 anticipation."
 22 So Mr Jenkins was making it clear to you
 23 he'd never been to court?
 24 **A.** Yes.
 25 **Q.** He was asking for your help?

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1 A. Yes.

2 Q. You told him that going to court is pretty much
3 as you see on the television.

4 A. That's what I put on the email, yes.

5 Q. Is that accurate, that what happens in court is
6 like what happens on television?

7 A. Sometimes yes, sometimes no. But there was
8 a conversation I had with Mr Ward, I think it
9 was, about the fact that Fujitsu -- by
10 telephone -- Fujitsu people haven't been to
11 court before, so, obviously, I don't know
12 whether other arrangements need to be put in
13 place. I don't know whether there was. Well,
14 there clearly wasn't.

15 Q. Looking back, maybe with the benefit of some
16 reflection, do you considered this to be
17 adequate advice --

18 A. No.

19 Q. -- for a prosecution witness who had never give
20 oral evidence in court?

21 A. No.

22 Q. Would you agree that the advice given bears no
23 relation whatsoever to the sort of guidance and
24 advice that ought to be provided to a witness?

25 A. Yes, that's why I was in communication with the
113

1 Horizon system may have errors that caused the
2 creation of zero lines --

3 A. No.

4 Q. -- ie "Don't worry about that stuff that we've
5 cut out"?

6 A. No.

7 Q. "You can't be asked about it"?

8 A. No.

9 Q. That's just a bit of casual advice, a bit like
10 "Going to court is a bit like you see on the
11 television"; is that right?

12 A. I've explained that's what I was told to write.

13 Q. Can we move on, please. FUJ00152650. This is
14 an email from you after the court appearance to
15 a range of people, including Mr Jenkins and
16 Penny Thomas, Andy Dunks, back in Fujitsu, dated
17 8 November 2006:

18 "Just to let you all know, Mr Thomas was
19 sentenced to 9 months in jail on Monday. He was
20 also ordered to pay costs and his finances are
21 now subject to further investigation.

22 "Thank you for all your help with this case.
23 Mr Thomas was not expecting a custodial sentence
24 and although not a particularly lengthy
25 sentence, it does send out the right message."
115

1 Casework Team.

2 Q. Do you think that your level of training and
3 understanding was typical of other Investigators
4 at that time?

5 A. I can't speak for other Investigators. I was
6 new at this time.

7 Q. Did you alert anyone else in the Post Office
8 team as to this request for help or guidance by
9 Mr Jenkins?

10 A. Only the Casework Management Team. I think
11 I would have had a discussion with my mentor and
12 my line manager.

13 Q. You tell him that you can only be asked
14 questions specifically about your statement.
15 Where did you learn that information from?

16 A. That's what I was told to write.

17 Q. Told by whom?

18 A. That would have come from probably my team.

19 Q. What does that mean: "my team"?

20 A. Either the person mentoring me or my line
21 manager.

22 Q. Did that line "You can only be asked questions
23 specifically about your statement", have
24 anything to do with the fact that what had been
25 expunged from Mr Jenkins' statement was that the
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1 You attach a link to a BBC article. What
2 was the right message that was being sent out?

3 A. That was a cut and paste from the -- what I was
4 sent by the Communications Team to refer to.

5 Q. Who, within the Post Office, was responsible for
6 drawing up that message?

7 A. That was the Communications Team. It's like
8 a media team where, I don't know, the press,
9 et cetera, would go to them for comment, and
10 that's what I was told to put.

11 Q. Why were you speaking with the media team, the
12 Communications Team --

13 A. They spoke to me.

14 Q. -- about the contents of an email being sent
15 internally and to Fujitsu?

16 A. I think the case was quite high profile, I think
17 it had been on the TV, and that's when the media
18 team, they got in touch with me, and this was
19 the party line to be told. And that's what
20 I did; I cut and pasted it from their message.

21 Q. So you were just following orders?

22 A. Yes.

23 Q. Did you share the view that a custodial sentence
24 sends out the right message to subpostmasters?

25 A. Not necessarily, no. My view on it was I was
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1 not expecting Mr Thomas to get a custodial
2 sentence.

3 **Q.** Was there often messaging like this by the Post
4 Office's PR machine?

5 **A.** It wasn't the only time I experienced it.

6 **Q.** You were saying you were told to say this, even
7 though you didn't think it personally yourself?

8 **A.** That was the message. I don't think it really
9 mattered, though. I don't think I was even
10 asked what my view on it was. It's -- this is
11 just -- this is the -- this is the response from
12 the Post Office.

13 **Q.** Can you help us why the communications
14 department would be dictating your -- the
15 contents of an email to Fujitsu?

16 **A.** I would imagine it's that we all give the same
17 message. It's a linear approach. I don't know.
18 I don't know what their reasons were at the time
19 but that's what I was told to follow.

20 **Q.** Were you aware of a sense that it was important
21 to the Post Office that this case should set
22 a precedent to other subpostmasters who raised
23 a problem with Horizon?

24 **A.** I don't know if -- my view on it at the time
25 was -- well, I don't know what the reasons were

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1 had, yes?

2 **A.** From my recollection -- and I have relied
3 heavily on the documentation with this because
4 I didn't recall it at first -- but I just don't
5 think I could get to the bottom of who had done
6 what in the office.

7 I couldn't prove or disprove Ms Skinner had
8 or hadn't, and the same with some of the
9 witnesses, although, you know, the witnesses did
10 give some accounts and, you know, on the balance
11 of probabilities, I couldn't determine who had
12 done what.

13 **Q.** If we just look at your witness statement,
14 please, at page 21, paragraph 68. It's at the
15 foot of the page, paragraph 68. This under the
16 heading of "Janet Skinner":

17 "My views in this case have not changed in
18 [I think that's 'any'] respect. I was not
19 convinced Ms Skinner had stolen the money and
20 there was no evidence to prove she had. I was
21 therefore unhappy with the theft charge and
22 conveyed this at the time to the assisting
23 lawyer."

24 Yes?

25 **A.** Yes.

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1 at the time but I know now, and I probably knew
2 when I was leaving, that there was some lengths
3 that were being gone to to try and protect the
4 system, let's say.

5 **Q.** Who did you learn that from?

6 **A.** That was just my view, because I could see what
7 was happening before I left.

8 **Q.** What could you see was happening before you
9 left?

10 **A.** That people were raising concerns over the
11 system.

12 **Q.** But what about the response to that? What could
13 you see in relation to the response to that?

14 **A.** It seemed to be a denial that anything was wrong
15 and it was like protect at all costs because,
16 obviously, they're invested.

17 **Q.** Can we turn to Janet Skinner. That can come
18 down. Thank you.

19 In your witness statement, it's
20 paragraph 68, you tell us, Ms Matthews, that you
21 were unhappy that Janet Skinner was charged with
22 theft.

23 **A.** Yes.

24 **Q.** You did not think that she had stolen the money
25 and that there was no evidence to prove that she

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1 **Q.** So you didn't think she had but, more
2 importantly, there wasn't any evidence to prove
3 that she had committed the offence of theft,
4 correct?

5 **A.** Right, yes.

6 **Q.** You interviewed Janet Skinner alongside
7 Mr Bradshaw, didn't you?

8 **A.** Yes.

9 **Q.** Did he, Mr Bradshaw, agree with you that, at
10 that stage, there was no evidence of theft?

11 **A.** I don't know. I don't know what Mr Bradshaw
12 thought at the time.

13 **Q.** Did you discuss it as co-investigators?

14 **A.** I would have done but I can't remember what his
15 views were.

16 **Q.** Did either of you say to Ms Skinner "We've dealt
17 with people who have stolen money from the Post
18 Office before but we know that you haven't
19 stolen the money"?

20 **A.** I don't recall saying that.

21 **Q.** So she wouldn't have known that you thought that
22 she was innocent of theft?

23 **A.** No, because when I spoke to Ms Skinner, I did
24 some follow-up statements after that and it was
25 on the basis of everything put together that

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1 I didn't think she'd stolen anything.

2 **Q.** I see. Did you communicate that view to

3 Mr Bradshaw?

4 **A.** I can't remember. I presume I did but, if you

5 want me to say absolutely, I can't remember. We

6 had conversations about all of the cases

7 regularly, so I presume I did but I can't say

8 for sure.

9 **Q.** When you reached this view, as you say, as

10 a result of investigation, that Ms Skinner had

11 not stolen the money or there was no evidence to

12 prove that she had, did you communicate your

13 view to Ms Skinner then?

14 **A.** No.

15 **Q.** You say that you spoke to or conveyed this to

16 the assisting lawyer; who was the assisting

17 lawyer?

18 **A.** I think it might have been Juliet McFarlane.

19 **Q.** What did -- if it was Juliet McFarlane -- she

20 say?

21 **A.** I can't remember but I remember, when I saw the

22 charges, I said I didn't really agree with them.

23 But, again, it was a case of she's the legal --

24 legally trained person who makes the decision.

25 I don't make them decisions.

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1 received the actual summonses or anything.

2 I think, yeah, I think it was just the one phone

3 call, because as I've said, like I'm guessing

4 I said something along the lines of -- because

5 I can't remember exactly, that, you know,

6 I couldn't point the finger definitely at one

7 person because there seemed to be a lot of

8 people there and there was a lot of people had

9 different opportunities and reasons. So, you

10 know, Ms Skinner was adamant she hadn't stolen

11 it and never made any admissions to that, from

12 my recollection, and I was shocked that the

13 theft charge was there.

14 **Q.** So, presumably, when she was sent to prison,

15 leaving behind her two teenage children, you

16 thought that was monstrously unfair?

17 **A.** It's never a good thing when people go to prison

18 and I don't take -- it's not something I take

19 great pleasure in seeing.

20 **Q.** Might that contain a whiff of understatement.

21 I wasn't asking you whether --

22 **A.** I don't know what your question is meaning to

23 say, leaving her two children behind, because

24 that's very emotive and I don't like to --

25 **Q.** No, it's a matter of fact.

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1 **Q.** Did you speak to your line manager about it?

2 **A.** He would have known.

3 **Q.** I'm sorry?

4 **A.** He would have known because that would have been

5 the communication at the time. I'm not sure if

6 it was still Mr Dawkins or not at that point.

7 We had several managers.

8 **Q.** Presumably, if you think (a) that Ms Skinner had

9 not stolen the money but (b), perhaps more

10 importantly, there wasn't any evidence to prove

11 that she had, but the lawyer was pressing ahead

12 with a theft charge, that would be quite

13 a significant event, wouldn't it?

14 **A.** I can only presume that she thought there was

15 some evidence in there that warranted that

16 charge.

17 **Q.** We haven't seen any communications between you

18 and the lawyer over this issue. Was this all

19 done orally?

20 **A.** It was a phone call, when I got the -- well, I'm

21 trying to remember correctly. I think it was

22 a phone call that I made to her when I received

23 the charges.

24 **Q.** Was it just the one phone call?

25 **A.** Sorry, notification of the charges. I hadn't

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1 **A.** It is a matter --

2 **Q.** She left two teenage children behind whilst she

3 went to prison.

4 **A.** Yes.

5 **Q.** It is emotive, you're right, and I'm asking you

6 what your reaction was when she was sent to

7 prison, leaving her two teenage children behind.

8 Please give me an answer.

9 **A.** It's not a nice feeling and she -- as far as

10 I was aware, she went to prison for false

11 accounting, not theft. But it's never a good

12 thing and I never like it and it's, you know --

13 I'm sorry it's happened.

14 **Q.** Can we look, please, at POL00106906 and at

15 page 51, please. If we just scroll down we can

16 see the entirety of the document. It's a letter

17 from Ms Skinner's Area Intervention Manager,

18 Angela Bettison -- and scroll up, please --

19 dated 12 December 2005, to Ms Janet Skinner. It

20 says:

21 "Dear Janet,

22 "We recently discussed the change in your

23 remuneration to Traffic Related Pay, this will

24 commence from 1 January 2006. The new contract

25 is currently being drawn up and will be sent to

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1 Vicky Harrison (Contracts and Services Manager)
2 to be signed off and you will of course receive
3 a copy.

4 "This means that all of the hard work that
5 you have put into the office in recent weeks
6 will be paid in February's remuneration.

7 "Thank you for your continued hard work and
8 help running North Bransholme Post Office."

9 This is some evidence -- it's a couple of
10 months before the audit and interview -- that
11 Ms Skinner was a dedicated subpostmistress
12 working well, wasn't it?

13 **A.** I didn't have anything to do with this letter so
14 I don't know, but it sounds like they were very
15 grateful and supportive, yes.

16 **Q.** Would this be the kind of document that ought to
17 be brought to a reviewing lawyer's attention, so
18 that he or she could consider whether
19 a subpostmistress like this would be likely,
20 very shortly thereafter, to commit crimes
21 against the Post Office?

22 **A.** I don't know. That would be for the Legal team.
23 I don't know whether they would take that into
24 consideration or not. And I know Ms Skinner was
25 highly thought of and was given responsibility

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1 after -- further on from the investigation
2 interviews, yes.

3 **Q.** If we just scroll down under "Observations":

4 "The defendant a former subpostmistress ...
5 The charges concern the theft of monies from the
6 post office during the course of employment."

7 Then over the page and scroll down, please.
8 Last paragraph on the page:

9 "Counsel is requested to advise on evidence,
10 and, in particular, whether he considers any
11 additional evidence is required. Counsel's
12 attention is drawn to the enclosures at 9 and 10
13 above ..."

14 They're the two minutes that we've just
15 looked at:

16 "... and is asked whether a theft charge is
17 still appropriate in all the circumstances.
18 Mrs Wisker is a temporary subpostmistress at
19 North Bransholme who took over the office
20 following Janet Skinner's apprehension. These
21 enquiries have not yet been completed in the
22 case against Mrs Lyell. Whilst clearly the new
23 information does not fare well with the
24 prosecution case particularly as Mrs Lyell was
25 a witness (now unused) this does not necessarily

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1 for more than one office and she wouldn't have
2 been given that if she wasn't considered to be
3 a stand-up subpostmistress.

4 **Q.** Can we turn to disclosure of other information,
5 please, and look at POL00044673. This is
6 instructions and a brief to counsel in the case
7 of the *R v Janet Skinner*. If we go to the last
8 page, please -- in fact it's not the last page,
9 it's page 4, please -- and scroll down. They're
10 dated December 2006, drawn up, it seems, by
11 Ms McFarlane and Mr Taylor, the legal executive.

12 Now, I suspect you don't have any role in
13 the creation of these instructions and brief to
14 counsel; is that right?

15 **A.** (*Unclear*), yes.

16 **Q.** If we go back to page 1, please, can we see that
17 there's a list of documents that the barrister
18 was sent. If we scroll down a little bit more,
19 items 9 and 10 are copies of minutes from you,
20 dated 4 December 2006 and 24 November 2006. As
21 we're going to see, I think, they concern
22 somebody called Wendy Lyell; do you remember
23 Wendy Lyell?

24 **A.** I don't remember without being prompted by the
25 documents but I do recall there was something

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1 mean that Mrs Lyell is the only thief at the
2 office. Counsel may in any event feel that the
3 papers do reveal a very significant
4 sophisticated method of false accounting on
5 behalf of the Defendant in order to conceal
6 a loss for which he raised little concern with
7 her staff."

8 Can we look at one of the minutes please
9 that's referred to as enclosure 9 and 10
10 POL00048272. If we scroll to the bottom please
11 and just a bit more, please, we'll see this is
12 one of your two minutes that are referred to in
13 those papers to counsel, dated 24 November 2006.
14 Then scroll to the top, please. So it's
15 addressed to Juliet McFarlane:

16 "As discussed today on the telephone, I am
17 forwarding the committal papers in respect of
18 Janet Skinner.

19 I have contacted Joanne Wisker, temporary
20 subpostmistress at North Bransholme office to
21 ascertain the details surrounding the suspension
22 of Wendy Lyell, who is a witness in the case
23 against Ms Skinner. This following a loss at
24 the branch of [£2,800-odd].

25 "Mrs Wisker, who also owns Chanterlands

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1 Avenue Post Office, was contacted by a member of
 2 staff as they were concerned over the movement
 3 of £2,000 between individual stock units. It
 4 appears Mrs Lyell contacted a colleague, Avril
 5 and said she had removed £2,000 out of her
 6 individual sealed stock unit pouch as she was
 7 concerned over running out of cash before the
 8 remittance into the branch was received.
 9 Mrs Lyell added that she would return the cash
 10 today, which was her next schedule day on duty.

11 "Mrs Wisker stated she arrived at the branch
 12 this morning and spoke with Mrs Lyell. It is
 13 unclear when the conversation between Mrs Lyell
 14 and Avril took place. However, when Mrs Wisker
 15 checked Avril's stock unit, it shows a loss of
 16 £2,000.

17 "There was an issue over a bag of £2 coins,
 18 totalling £500 ..."

19 The next paragraph:

20 "The situation at the present time is that
 21 Mrs Lyell has been suspended from her duties
 22 pending further checks being undertaken by
 23 Mrs Wisker."

24 Then at the end:

25 "Mrs Wisker has a number of areas to check
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1 Q. Did that also mean that you were the Disclosure
 2 Officer?

3 A. Yes, I disclosed things to the Criminal Law
 4 Team.

5 Q. Is that how you viewed the duties of
 6 a Disclosure Officer, to disclose things to the
 7 Criminal Law Team, rather than having
 8 a responsibility both to the defendant and to
 9 the court to give disclosure?

10 A. Yes.

11 Q. So who would have been responsible for ensuring
 12 that information of the kind that we see here
 13 was relayed to the defence?

14 A. That would be the Criminal Law Team.

15 Q. Who would be responsible for ensuring that
 16 material like this went onto an Unused Material
 17 Schedule?

18 A. That would be the Criminal Law Team and the
 19 Prosecution Support Office. So any additional
 20 material from what I'd already forwarded would
 21 be added to or an additional schedule would be
 22 done by them to present the cases to the
 23 defence.

24 Q. Can we look, please, at POL00048259. Can we see
 25 this is a "Schedule of Non-Sensitive Unused
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1 and verify information. She is to keep me
 2 informed throughout this process with any
 3 relevant finding which I will relay to
 4 yourself."

5 So this is a formal means of communication
 6 of information relevant to the case against
 7 Mrs Skinner from you to the relevant lawyer; is
 8 that right?

9 *(No audible answer)*

10 Sorry I missed your answer there?

11 A. Yes, sorry.

12 Q. Wendy Lyell was somebody who you had taken
 13 a witness statement from?

14 A. Yes.

15 Q. She was a lady that worked in Mrs Skinner's
 16 branch --

17 A. Yes.

18 Q. -- and she was subsequently arrested for theft?

19 A. Yes.

20 Q. Yes? Now, I think you were the Lead
 21 Investigator in this case by now. We're now in
 22 late 2006.

23 A. Yes.

24 Q. Yes?

25 A. Yes, sorry. Can you not hear me? Yes.
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1 Material", in the case of Janet Skinner. Then
 2 if we look at the foot of the page, we can see
 3 the date of the schedule, 16 November 2006. Can
 4 you see that?

5 *(No audible response)*

6 Then if we go to the top, please, it states:

7 "The Disclosure Officer believes that the
 8 following material which does not form part of
 9 the prosecution case is NOT SENSITIVE."

10 Then you signed that at the bottom, didn't
 11 you?

12 A. Presumably, yes.

13 Q. If we scroll down, see under where it says,
 14 "GRO" that means General Restriction Order.
 15 We've blacked out your signature?

16 A. Yes.

17 Q. So were you responsible for typing documents
 18 like this up?

19 A. Yes.

20 Q. Did you, consistently with the answers you gave
 21 a moment ago, believe that this was just a means
 22 of communication of information to the lawyer as
 23 opposed to a declaration, essentially, to the
 24 defence and to the court?

25 A. No, I saw it as a declaration, but it always
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1 went to the Criminal Law Team because there were
2 occasions where -- I don't know in this
3 particular case, but I do recall times when they
4 would move things around on schedules. So I may
5 have put it as unused and they'd moved it onto
6 the used.

7 So sometimes what I'd actually forwarded was
8 not exactly the same as what was disclosed,
9 maybe the other way as well. Maybe some things
10 that I put as unused they would see as evidence.

11 **Q.** So you were responsible for typing these up.

12 The reviewing lawyer would look at them and
13 sometimes move things from used to unused, and
14 from unused to used, or from non-sensitive to
15 sensitive?

16 **A.** I don't know about the sensitive part because
17 I don't recall too much being on them, if
18 anything, but certainly between the used and
19 unused, yes, because they obviously cast their
20 legal eye upon it, of which I'm not legally
21 trained, and they consider things differently.

22 **Q.** In any event, take it from me that the material
23 relating to Wendy Lyell isn't on this schedule?

24 **A.** Okay.

25 **Q.** Okay? I don't want to run through it all, but

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1 **Q.** Can we then see what happened when agent
2 solicitors were instructed on the same day,
3 6 December, POL00048303. This is a letter from
4 Juliet McFarlane to agency solicitors, Myer
5 Wolff Solicitors in Kingston Upon Hull:

6 "I would first refer you to the minutes of
7 24 November 2006 and 4 December 2006 from the
8 Officer Diane Matthews."

9 We've looked at one of those:

10 "As I understand it Mrs Wisker is the
11 temporary subpostmistress at North Bransholme.
12 Police enquiries have not yet been completed.
13 Whilst clearly the new information does not bear
14 well with the prosecution case particularly as
15 Ms Lyell is the witness, this does not
16 necessarily mean that Ms Lyell is the only thief
17 at the office. The papers in any event do
18 reveal a very sophisticated method of false
19 accounting on behalf of Ms Skinner in order to
20 conceal a loss for which she raised little
21 concern with her staff. Naturally the above
22 information will need to be disclosed to the
23 Defence (although the officers reports
24 themselves are confidential)."

25 So this is a letter of 6 December in

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1 it isn't. Can we move forwards in time to see
2 what happened, then POL00048292. This is
3 a letter of 6 December from Juliet McFarlane to
4 you and the Post Office Investigation Team; can
5 you see that?

6 **A.** Yes.

7 **Q.** She says:

8 "The committal papers have been approved and
9 served on the Defence Solicitors", and she
10 encloses a copy.

11 Then scroll down:

12 "I have noted the present position regarding
13 Wendy Lyell and that police enquiries are
14 continuing. This information will need to be
15 disclosed to the defence in due course. Further
16 attempts will need to be reviewed to see whether
17 the charge of theft stands. Apprehension of
18 Mrs Lyell is not in itself conclusive evidence
19 that she alone was the thief. However this will
20 depend on the evidence revealed in due course.
21 I have also removed Wendy Lyell's statement from
22 the bundle, this can be placed on the unused."

23 That's an example of what you were just
24 describing, yes?

25 **A.** Yes.

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1 relation to a committal hearing we can see on
2 the 12 December 2006. What Ms McFarlane is
3 saying is that "We're not going to reveal this
4 information about Ms Lyell now, we're going to
5 reveal it in due course"; can you see that?

6 **A.** Yes.

7 **Q.** Were you aware of anything like a duty of
8 candour when attending committal proceedings?

9 **A.** No.

10 **Q.** Were you trained on being open and transparent
11 to a court at the point of committal hearings,
12 ie to reveal information at the point of
13 committal which tended to undermine the
14 prosecution case?

15 **A.** No.

16 **Q.** In any event, so far as we can tell, there was
17 no disclosure of the Lyell information at or
18 before the point of committal.

19 Then can we turn to much later during the
20 confiscation proceedings, again --

21 **A.** Can I just take a comment that I've not --
22 I wasn't aware of that letter. I wasn't copied
23 in. I don't believe I've seen the letter to
24 Myer Wolff. So I didn't know that had been
25 served. But I would have expected them

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1 documents to be served.
 2 **Q.** Can we look, then, at what happened later during
 3 the confiscation proceedings, POL00048819. Can
 4 we see this is an email of mid-2007 from Juliet
 5 McFarlane to you and others. She says:

6 "Diane

7 "I am presently dealing with the
 8 Confiscation proceedings. The Defence would
 9 like to know whether Mrs Lyell was prosecuted
 10 (by the police?) and if so the details. Could
 11 you enquire and get back to me."

12 Then POL00048829, your reply:

13 "No charges were brought against Ms Lyell by
 14 Humberside Police. [She] was interviewed but
 15 there was no evidence to support a prosecution."

16 Then POL00048856, letter of 3 July 2007 to
 17 defence solicitors Max Gold Partnership. Second
 18 paragraph:

19 "With regards to your comments raised in
 20 paragraph 9 I am informed by the Investigation
 21 Officer that whilst Ms Lyell was interviewed by
 22 Humberside Police there was no evidence to
 23 support a prosecution."

24 Okay, that can come down, thank you.

25 So we can see the revelation of some

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1 Can I take you, please, to your statement
 2 which is, it's likely to be in front of the
 3 document handler, but it's WITN08330100. So I'm
 4 going to refer you to page 35, paragraph 107.
 5 Ms Matthews, paragraph 107. Do you have that,
 6 page 35?

7 **A.** Yes.

8 **Q.** It's the bottom of that page. What you say
 9 there is this:

10 "When I left POL in 2008, the issue of the
 11 Horizon system having bugs and its integrity
 12 were just starting to be raised."

13 You go on to say:

14 "I did not become involved in this whilst in
 15 POL and where raised as mitigation in my
 16 investigation, I followed the process and raised
 17 the issues."

18 Okay?

19 **A.** Yes.

20 **Q.** So the date that you have within your statement
 21 is potentially an important one for the Inquiry
 22 to reflect on. Now, you've said in your
 23 evidence this afternoon -- at, I think, about
 24 2.05 this afternoon -- that the Post Office was
 25 denying that there were issues with the Horizon

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1 information in the course of the conference
 2 occasion proceedings against Janet Skinner.

3 Can you help us: was the material about the
 4 possible prosecution or the arrest of Wendy
 5 Lyell revealed to Janet Skinner or her Legal
 6 team before she was convicted.

7 **A.** I wouldn't know. That should've been done by
 8 the prosecution office or Criminal Law Team.

9 **Q.** That was their responsibility, was it?

10 **A.** Yeah, I just would have expected them to have
 11 done that.

12 **Q.** What about you compiling a supplemental schedule
 13 of unused material?

14 **A.** That just wasn't the way it worked.

15 **MR BEER:** Yes, thank you very much. Those are the
 16 only questions I ask.

17 I'm going to look around the room to see
 18 whether there are any other questions.

19 Just one set of questions, sir, from

20 Mr Stein.

21 **SIR WYN WILLIAMS:** Yes.

22 **Questioned by MR STEIN**

23 **MR STEIN:** Good afternoon, my name is Sam Stein.

24 I represent a very large group of subpostmasters
 25 and mistresses.

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1 system. Your words were "That was denial at all
 2 costs".

3 Now, can you help us just understand that
 4 a little bit more: who was sending out this
 5 message, this denial at all costs message?

6 **A.** I don't know what person, but I just, as time
 7 was passing on with some more people blaming,
 8 rightly so, the Horizon system, and saying I've
 9 never heard the words "bugs and defects" until
 10 late, you know -- well, as I was about to leave,
 11 but it seemed, when the questions were raised
 12 and that conversations that I can -- I can't
 13 recall who said them, but it was "It won't be
 14 Horizon system, it's not Fujitsu, it's" -- and
 15 it's like it was a total denial.

16 And it's just my interpretation that this
 17 was done because they were heavily invested in
 18 it. It had to work. Not just from -- I don't
 19 think just from a monetary point of view they
 20 were heavily invested. I think also from
 21 a reputational point of view they were heavily
 22 invested and I think the fallout to admit, at
 23 that point, they just didn't want to face.

24 That was just my opinion, I knew it was
 25 talked about within the team, as in the greater

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1 team. I don't have any firm comments made by
2 individuals to back what I've just said up but
3 my feeling at that time was that, when these
4 issues were raised, they wanted them to be put
5 to bed. That's just my opinion.

6 **Q.** Now, the date, 2008, and the message that was
7 being sent around by POL, that "denial at all
8 costs" message, how close to the date of when
9 you left in 2008 was this occurring: was that in
10 the months or year before?

11 **A.** I'm sorry, I can't give you a date. I just knew
12 I was getting more and more unhappy working
13 there because of certain things that were
14 happening, and I made the decision to leave
15 because of it.

16 **Q.** Those certain things that were happening, were
17 they relevant to the purposes of the Inquiry, in
18 other words regarding the Horizon system and its
19 issues?

20 **A.** No, it was more a personal issue with the Head
21 of Security at the time.

22 **Q.** Ms Matthews, when considering the question of
23 the way that POL was denying these issues, can
24 I just see if we can probe a little bit further.
25 Your line manager was who at that time?

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1 should keep schtum about this and keep it quiet?

2 **A.** No.

3 **Q.** It's just a coincidence, is it, that you're one
4 of a number of witnesses that can't seem to
5 remember who sent out the message about keep
6 quiet about the Horizon system? That's just us
7 coincidence, is it?

8 **A.** I think it's quite unfair to say them things
9 when you're asking me about conversations from
10 a long time ago and I've done my utmost to try
11 to recall and be honest in this situation. It
12 was a feeling amongst people that that's what
13 was happening.

14 It wasn't a conversation where somebody
15 dictated "This the line we're going to take", it
16 wasn't like that. But things were happening
17 more often and -- in terms of subpostmasters
18 saying it was the system, and it was getting
19 more and more frequent and that led you to
20 believe is there something in it?

21 So I don't -- it wasn't a message where, you
22 know, we were all brought together or people
23 were told, "This is what we're going to do". It
24 wasn't that sort of situation.

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

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1 **A.** When I left, I think it was somebody called
2 Julian Tubbs.

3 **Q.** Julian? Repeat that please?

4 **A.** Julian Tubbs, but he was only by line manager
5 for a very short period of time. Prior to that
6 it was Dave Pardoe.

7 **Q.** Now, those two individuals, Mr Tubbs and
8 Mr Pardoe, do you think the message was being
9 sent around -- the message of denial at all
10 costs was being sent around by those
11 individuals; were they communicating that to
12 you?

13 **A.** I don't think I ever had a proper conversation
14 with Mr Tubbs and it's not my belief that
15 Mr Pardoe made them assumptions.

16 **Q.** Ms Matthews, this particular issue, which is
17 that that POL was denying and was trying to tell
18 its staff members that there are no issues with
19 the Horizon system, this has come up with now
20 a number of witnesses before this Inquiry, and
21 there appears to be a collective amnesia about
22 this amongst individuals like yourself, in other
23 words not able to recall who on earth was
24 setting out this message.

25 Has word gone around, Ms Matthews, that you

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1 **SIR WYN WILLIAMS:** Thank you. Is that it, Mr Beer?

2 **MR BEER:** Yes, it is, sir.

3 **SIR WYN WILLIAMS:** Well, thank you very much,
4 Ms Matthews, for giving your witness statement
5 and for answering a good many questions today.
6 I'm grateful to you.

7 **THE WITNESS:** Thank you.

8 **MR BEER:** Sir, we return now at 10.00 am on Tuesday
9 with Mr Graham Brander.

10 **SIR WYN WILLIAMS:** Yes, fine. Thank you.

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

12 (2.34 pm)

13 (The hearing adjourned until 10.00 am
14 on Tuesday, 28 November 2023)

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