

1 Wednesday, 29 November 2023

2 (9.15 am)

3 MS PRICE: Good morning, sir, can you see and hear  
4 us?

5 SIR WYN WILLIAMS: Yes, thank you.

6 MS PRICE: Please may we call Mr Pardoe.

7 SIR WYN WILLIAMS: Yes.

8 DAVID JOHN PARDOE (affirmed)

9 Questioned by MS PRICE

10 MS PRICE: Can you confirm your full name, please,  
11 Mr Pardoe?

12 A. David John Pardoe.

13 Q. You should have in front of you in a bundle  
14 a hard copy of a witness statement in your name,  
15 dated 24 October 2023. Have you got that?

16 A. Indeed.

17 Q. If you can turn to page 55 of that document,  
18 please --

19 A. Yes.

20 Q. -- you should have a copy with a visible  
21 signature; is that right?

22 A. It is indeed.

23 Q. Is that your signature?

24 A. It is.

25 Q. Are the contents of that statement true to the

1

1 A. It would have been sometime in the '80s.

2 Q. You then progressed to hold a number of  
3 administrative roles within the Liverpool  
4 district. One of these roles was designing and  
5 delivering training for subpostmasters; is that  
6 right?

7 A. It was.

8 Q. What did that training cover?

9 A. So that was a significant shift, I think I say  
10 in the statement that, historically, a new  
11 subpostmaster had effectively sat with the  
12 outgoing subpostmaster and been trained on site.  
13 And the ramification of that on occasion is that  
14 some bad habits were being picked up right from  
15 the get-go. So it was decided that there would  
16 be bespoke, classroom-driven training by skilled  
17 trainers, who would then take the new  
18 subpostmaster through a standard suite of  
19 training requirements, and they would then  
20 supplement that by onsite training.

21 So I think, from memory, there'd be a week  
22 or so spent in a training facility and then  
23 there would be at least one week spent working  
24 each day at branch with the subpostmaster, and  
25 I was one of two trainers who were actually

3

1 best of your knowledge and belief?

2 A. They are.

3 Q. For the purposes of the transcript, the  
4 reference for the statement is WITN08170100.

5 Thank you for coming to the Inquiry to  
6 assist it in its work and for providing the  
7 witness statement that you have. As you know,  
8 I will be asking questions on behalf of the  
9 Inquiry.

10 Starting, please, with an overview of your  
11 career with the Post Office, I understand you  
12 have not had the benefit of seeing any written  
13 records confirming the exact dates for which you  
14 held relevant roles; is that right?

15 A. Unfortunately that's correct.

16 Q. The account of the roles you held set out in  
17 your statement is you doing your best from  
18 memory?

19 A. Indeed.

20 Q. Is it right that you first joined the Post  
21 Office as a Crown Office counter clerk?

22 A. Yes.

23 Q. Can you help with what year that was? You've  
24 said how old you were in the statement. Can you  
25 help with which year that was, roughly?

2

1 trialling that approach nationally on behalf of  
2 the Post Office.

3 Q. There came a point when you were approached by  
4 the Post Office Investigation Department to take  
5 up a specific role. Before you explain what  
6 that role was, can you help with the remit of  
7 the Post Office Investigation Department at that  
8 time?

9 A. So the Post Office Investigation Department,  
10 we'd refer to them as POID at the time, and they  
11 had group-wide remit. So they would conduct  
12 investigations impacting Royal Mail Group and,  
13 from memory at the time, that would have  
14 consisted of Post Office, Royal Mail, of Cashco,  
15 who were the cash-carrying arm of Post Office,  
16 and Parcelforce Worldwide, as well, who were  
17 obviously the parcel-carrying arm of the Post  
18 Office and they would conduct the full range of  
19 investigation activities on behalf of those  
20 business units.

21 Q. What was the role you were offered when you were  
22 first approached by the POID?

23 A. Yeah, I was approached by two gentlemen that  
24 I already knew were members of POID. I think  
25 ironically one had interviewed me for a counter

4

1 shortage a year or so before that, and they  
2 approached me, and they outlined that there was  
3 a branch in inner city Liverpool, that it was  
4 a sub office branch or a modified branch,  
5 I think it was referred to at the time, run by  
6 a subpostmaster, that was having a series of  
7 significant losses and suspected benefit book  
8 payment fraud.

9 They knew the subpostmaster was not involved  
10 and they asked if, effectively -- and it sounds  
11 a little bit grandiose -- if, effectively, I'd  
12 go undercover in that branch, run that branch on  
13 behalf of the subpostmaster whilst at the same  
14 time being the conduit for them to perform  
15 covert surveillance.

16 And this was the day when the covert  
17 surveillance couldn't be done remotely, couldn't  
18 be done by IP cameras, it was simply a pinhole  
19 camera in a false ceiling, connected to a video  
20 recorder and my remit was to run the branch on  
21 a day-to-day basis and to change the video tapes  
22 and to meet one or other of the two gentlemen,  
23 early morning in branch, to hand over videotape  
24 product from the previous two or three days.

25 **Q.** You were then offered the role of the  
5

1 for the POID interface role?

2 **A.** None whatsoever, and I've -- if I can go on,  
3 I feel I say in the statement that I didn't feel  
4 disadvantaged by that. It was purely -- I'd  
5 have a report from an audit function from  
6 a Regional Manager, an Area Manager and I would  
7 report that into POID. It was as simple as  
8 that; it was more administrative.

9 **Q.** Is it right that there came a point when you  
10 were encouraged to become more involved in  
11 investigations being submitted to the POID?

12 **A.** This is where I'm really going to have to search  
13 back into my memory. There came a time when  
14 I had elements of formal training, with a view  
15 that, rather than just simply piecemeal hand  
16 this investigation product over to POID, that we  
17 would start to support as second officers.

18 I never fully understood the politics behind  
19 that. I suspect that's some way above my pay  
20 grade but you're right: there was certainly  
21 a time when we were being encouraged to sit  
22 closer with POID and that would involve  
23 performing second officer type activity for  
24 interviews under caution.

25 **Q.** You say at paragraph 11 of your statement that  
7

1 Investigation Liaison Officer; is that right?

2 **A.** That's right.

3 **Q.** That was in around 1991?

4 **A.** It would have been, yes.

5 **Q.** What did the role involve?

6 **A.** So I've referenced POID as being the --  
7 obviously the group-wide body that would drive  
8 investigations. So, for each business unit,  
9 there needed to be some form of conduit to take  
10 suspected cases of dishonesty and report those  
11 cases into POID. And that liaison role, that's  
12 exactly what that did. So it would take *prima*  
13 *facie* cases concerning potential staff  
14 dishonesty, it would put those into a reporting  
15 format, submit with that outline of evidence,  
16 and submit that for consideration for further  
17 investigation into POID.

18 So it would not have been performing first  
19 officer, certainly, would not even have been  
20 performing second officer type activity; it was  
21 purely an administrative role that would be the  
22 conduit between the Liverpool district, as  
23 I remember at the time, and National POID or  
24 certainly the Liverpool branch of POID.

25 **Q.** Is it right that there was no formal training  
6

1 this was the start of your formal training. Can  
2 you recall even roughly what year this would  
3 have been?

4 **A.** I think we'd be coming towards the mid-1990s,  
5 I would have thought for that, potentially  
6 coming into the late 1990s, that would seem to  
7 ring a bell with me.

8 **Q.** Is it right that this training was  
9 classroom-based training delivered by Royal Mail  
10 Group?

11 **A.** It was indeed. I do recall that, yes.

12 **Q.** You say at paragraph 11 of your statement that  
13 you had access to other materials; is that  
14 right?

15 **A.** Yes.

16 **Q.** You also say at paragraph 11 that you were very  
17 heavily mentored by an experienced and far more  
18 senior Investigation Manager in this role?

19 **A.** Absolutely, yes.

20 **Q.** You then became an Assistant Investigator in the  
21 newly formed Regional Security Department; is  
22 that right?

23 **A.** Correct.

24 **Q.** Again, roughly speaking, how many years after  
25 taking on the second officer role did you become  
8

1 an Assistant Investigator?  
 2 **A.** It would have been a matter of years. It  
 3 certainly wasn't a short few months; it would  
 4 have been a matter of years.  
 5 **Q.** At this stage, you underwent further training;  
 6 is that right?  
 7 **A.** Absolutely.  
 8 **Q.** You say that included classroom training as well  
 9 as electronic and paper handouts; is that right?  
 10 **A.** From memory, yes.  
 11 **Q.** You also have a recollection of meeting members  
 12 of the Criminal Law Team in your training; is  
 13 that right?  
 14 **A.** Yes, in Croydon, Impact House, as they were  
 15 based at the time, yes.  
 16 **Q.** You say at paragraph 21.2 of your statement that  
 17 you recall training sessions from both in and  
 18 out of house lawyers as well as training staff  
 19 from the Post Office Investigation Department;  
 20 is that right?  
 21 **A.** Yes, it is.  
 22 **Q.** Can you recall roughly how long you were  
 23 an Assistant Investigator before you became  
 24 a substantive lead Investigator?  
 25 **A.** It would have been two, three years, something  
 9

1 to that, please, it's page 9, and scrolling  
 2 down, please, to (iii), you say:  
 3 "The investigator role was regionally based.  
 4 My training detailed above was supplemented by  
 5 significant levels of supervision and general  
 6 oversight. In this role I was performing the  
 7 role of lead investigator and discharging  
 8 activity from interviews under caution through  
 9 to case paper and committal preparation. To the  
 10 best of my knowledge all my tenure in this  
 11 capacity was pre-Horizon."  
 12 Is it right, then, that you stopped  
 13 conducting investigations yourself before the  
 14 introduction of the Horizon system in the year  
 15 2000?  
 16 **A.** Yes, it is. I certainly recall that to the  
 17 extent, if I may add, that I think I was  
 18 deployed doing other activity when formal  
 19 Horizon training was being undertaken and I had  
 20 to have, effectively, a supplementary oversight  
 21 course to that.  
 22 **Q.** From the position of being a Regional Lead  
 23 Investigator, is it right that you then became  
 24 an Investigation Team leader, also regionally?  
 25 **A.** I do wonder if that wasn't superseded by another  
 11

1 like that.  
 2 **Q.** You deal with becoming a lead Investigator at  
 3 paragraph 16 of your statement. Could we have  
 4 that on screen, please, it is page 6 of  
 5 WITN08170100. You say here:  
 6 "Again, I would need reference to Post  
 7 Office HR details, but I then became  
 8 a substantive lead investigator. This move was  
 9 supported by additional training and my lead  
 10 work (first officer interviews, file preparation  
 11 and so on) was highly supervised to the extent  
 12 that even grammatical errors within reports  
 13 would be returned for correction -- that was the  
 14 standard of supervision. Even after this  
 15 promotion to lead investigator I remained in  
 16 supervision for many, many months and certainly  
 17 longer than for any professional role I have  
 18 held subsequently. I don't think this was any  
 19 reflection on my ability to progress at pace, it  
 20 was just the way it was. There was  
 21 a recognition that the role was unique and  
 22 required a high level of interpersonal skill and  
 23 confidence to deploy effectively."  
 24 You deal further with this role at  
 25 paragraph 21(iii) your statement. Could we turn  
 10

1 role, albeit there was a period obviously when  
 2 I became an Investigation Team leader.  
 3 **Q.** Can you recall what that other role might have  
 4 been in the interim?  
 5 **A.** I know that there was a role where I was  
 6 seconded, I think it was for around about  
 7 12 months, on the creation of Post Office  
 8 Limited. So that was project management work,  
 9 working from London. As I say, I don't know if  
 10 that came before or after -- I apologise,  
 11 I don't know if that came before or after the  
 12 team leader role. Certainly, yes, became  
 13 a substantive Investigation Team Leader.  
 14 **Q.** You deal with the team leader role and the  
 15 national roles you held at paragraph 21(iv) of  
 16 your statement. Scrolling down a little,  
 17 please, you say:  
 18 "I don't recall me holding National  
 19 Investigator role (I thought this was a title  
 20 afforded to a former line manager Mr Tony  
 21 Utting). There was a period when I was  
 22 responsible for leading a small team of  
 23 Investigators, again a regional role. This role  
 24 was leading on complex investigations and  
 25 supporting a team to ensure effective casework  
 12

1 delivery. Again, this was mainly pre-Horizon  
2 and was interspaced with a period supporting  
3 Tony Utting as National Investigation Manager  
4 for Post Office Limited; I also supported  
5 Mr Utting at this time with the draft of policy  
6 documents and also was seconded for a 12-month  
7 period as a project head to the creation of Post  
8 Office Limited from Post Office Counters."

9 **A.** Correct.

10 **Q.** In terms of the role you held supporting Tony  
11 Utting with the draft of policy documents, there  
12 is a document which has been provided to you  
13 relatively recently which may assist with dating  
14 this role. Could we have that on screen,  
15 please. The reference is POL00166569. This  
16 document is undated but it appears to set out  
17 the roles and responsibilities of a role you  
18 held at one point, that of Internal Crime Policy  
19 and Standards Manager. Do you recognise this  
20 document now?

21 **A.** I do, yes.

22 **Q.** Did you hold this role, Internal Crime Policy  
23 and Standards Manager?

24 **A.** I did. I wonder how much of the substantive  
25 role actually undertook those deliverables but

13

1 heading, there's this:

2 "Ensure that MI flows and sources are  
3 identified that facilitate the identification  
4 and prosecution of internal crime."

5 Second bullet point:

6 "Establish the adequacy of MI flows in the  
7 support of the above."

8 Thirdly:

9 "Ensure that MI access is identified to  
10 enable data retrieval in line with demands  
11 above."

12 Pausing there, can you help with what data  
13 was to be retrieved?

14 **A.** I -- sorry, I -- simply, reading that, I don't  
15 recall that. I think that's an element of the  
16 role that was clearly there within the design of  
17 the role that just didn't come through to  
18 fruition. I don't recall at that stage having  
19 a substantive role where I'd be the conduit for  
20 MI access at all. Sorry.

21 **Q.** The next bullet point says this:

22 "Through Legal Services (Criminal Law Team)  
23 establish the legal status of the Branch Trading  
24 Statement."

25 Is this a reference to the introduction of

15

1 I certainly held a role with that title, yes.

2 **Q.** Looking, please, to the last section towards the  
3 bottom of the page, "Role of Assurance", to the  
4 last bullet point, this is:

5 "To provide assurance to the National  
6 Internal Crime Manager in own areas of  
7 accountability."

8 Is this the role you were referring to in  
9 your statement when you say you supported Tony  
10 Utting as a National Investigation Manager?

11 **A.** It is, I've clearly used the wrong title.  
12 Apologies, yes.

13 **Q.** So do you think it is this role that involved  
14 you supporting Mr Utting with the draft of  
15 policy documents?

16 **A.** As required, yes.

17 **Q.** At the top of this document, please, the "Scope  
18 of Area" is set out. The first thing listed is  
19 "MI access/flows/adequacy". Can you help with  
20 what "MI" is an acronym for?

21 **A.** Management information.

22 **Q.** Then the second bullet point there, "Legal  
23 Services (Criminal Law) conduit" and "Internal  
24 crime risks and issues". Under the "Role of  
25 User for Own Operations Teams", that first

14

1 branch trading?

2 **A.** I'm assuming it is but, again, I have no  
3 recollection that I deployed any element of  
4 that.

5 **Q.** So this would have been after the introduction  
6 of Horizon --

7 **A.** Yes.

8 **Q.** -- trying to date this document.

9 **A.** Yes.

10 **Q.** The Inquiry understands branch trading to have  
11 been introduced in around 2005. Does that fit  
12 with your recollection of things?

13 **A.** I'd have to go with that, I thought this would  
14 be slightly earlier but, if that's the case,  
15 that's the case.

16 **Q.** It appears that one of your responsibilities was  
17 to establish the legal status of the branch  
18 trading statement. Can you recall why there was  
19 a need to establish the legal status of the  
20 branch trading statement?

21 **A.** And, again, that is an element of the role that  
22 I do not think came through to fruition. I do  
23 not recall a piece of work -- in fact, I don't  
24 know why that would even sit with that type of  
25 policy and standards role.

16

1 Q. Were you given any kind of briefing for this  
 2 role?  
 3 A. Well, of course there would have been a job  
 4 description. There would have been a remit to  
 5 that role. But, after the passage of so much  
 6 time, I can't say with conviction the precise  
 7 elements of the role and its deliverables.  
 8 Q. In the context of branch trading statements,  
 9 were events at Marine Drive Post Office,  
 10 relating to a subpostmaster called Lee  
 11 Castleton, raised with you by anyone, either in  
 12 a briefing when you took up the role or at any  
 13 point before or after you took up this role?  
 14 A. From memory, no.  
 15 Q. To the extent that you can recall, was the focus  
 16 on the branch trading statement as a result of  
 17 a desire to ensure that the branch trading  
 18 statement had the status of an unimpeachable  
 19 record of the cash and stock which an Auditor  
 20 should find when they audited a branch?  
 21 A. I don't recall it ever being outlined to me in  
 22 that context unfortunately, no.  
 23 Q. Can you recall what the Criminal Law Team's role  
 24 was in relation to establishing the legal status  
 25 of the branch trading statement?

17

1 A. More generally, from recollection.  
 2 Q. Did you provide any comment on what the training  
 3 and communication needs for operational  
 4 investigators were --  
 5 A. I would assume that I did during that period,  
 6 yes.  
 7 Q. The last bullet point here:  
 8 "Identify and comment on internal crime risk  
 9 issues within scope."  
 10 Can you recall if there were any new crime  
 11 risk issues which you identified on taking up  
 12 this role?  
 13 A. The only thing that springs to mind is if this  
 14 was towards the cessation of the benefit book as  
 15 a method of payment which, from memory, would  
 16 have been around about 2005, then there would  
 17 have been quite a significant tranche of work to  
 18 risk assure the withdrawal of that Post Office  
 19 product.  
 20 Q. Going to the next section, please, the "Role of  
 21 Planning". It says here you were to:  
 22 "Feed into the Planning Team information on:  
 23 "issues  
 24 "risks  
 25 "concerns

19

1 A. No, I can't.  
 2 Q. Looking at the next bullet point please:  
 3 "Through Legal Services (Criminal Law Team)  
 4 research alternative criminal charges to  
 5 accompany change in status of Cash Account to  
 6 Trading Statement."  
 7 Why was there a need to research alternative  
 8 criminal charges to accompany the change in  
 9 status of cash account to trading statement?  
 10 A. I've absolutely no clue. I've not a clue.  
 11 Again, I wouldn't know why that would sit with  
 12 a policy standards role, it seems completely  
 13 outside of that. You know, that should sit  
 14 firmly with the Criminal Law Team.  
 15 Q. Can you recall there being any discussion of  
 16 alternative criminal charges?  
 17 A. No, I can't.  
 18 Q. The next bullet point says this:  
 19 "Comment on trading and communication needs  
 20 to operational investigators and other  
 21 identified stakeholders."  
 22 Was this referring to training and  
 23 communication required because of the  
 24 introduction of branch trading, or more  
 25 generally?

18

1 "training & comms requirements (for  
 2 operational investigators & other  
 3 stakeholders)."  
 4 Then the last section deals with assurance.  
 5 We've touched on that last bullet point already.  
 6 Could we have paragraph 33 of Mr Pardoe's  
 7 statement on screen, please. It is page 15 of  
 8 WITN08170100. You say at paragraph 33:  
 9 "Very early in my Security career I worked  
 10 with Tony Utting as National Investigation  
 11 Manager. I held for a very brief period  
 12 a policy and standards role. I do not recognise  
 13 any of my work from this period in the supplied  
 14 documents. This would certainly have been  
 15 a pre-Horizon role. Any of my work from that  
 16 time I suspect would predate materials available  
 17 to be given to the Inquiry."  
 18 Having seen the roles and responsibilities  
 19 document since making your statement, I think  
 20 you now accept that the policy and standards  
 21 role was, in fact, a role you held after the  
 22 rollout of the Horizon system?  
 23 A. Absolutely, yes.  
 24 Q. Although you could not recognise any of your  
 25 policy drafting work in the documents supplied

20

1 to you by the Inquiry, can you recall what type  
 2 of policy documents you worked on?  
 3 **A.** I think, logically, there'd have been documents  
 4 around case file construction, documents of that  
 5 nature. I can't be more specific,  
 6 unfortunately.  
 7 **Q.** Accepting that it is difficult to recall exact  
 8 dates now, can you recall whether you took up  
 9 the role of Senior Security Manager before or  
 10 after you held the policy and standards role?  
 11 **A.** I think that would have been a more senior role,  
 12 so logically that would have been after the  
 13 policy and standards role.  
 14 **Q.** So assuming that you held the policy and  
 15 standards role at the point when branch trading  
 16 was introduced in around 2005, would that mean  
 17 you took up the role of Senior Security  
 18 Manager --  
 19 **A.** It would.  
 20 **Q.** -- after that?  
 21 **A.** It would.  
 22 **Q.** You address at paragraph 22 of your statement  
 23 the varied positions you held when you were  
 24 a Senior Security Manager, which included  
 25 Commercial Security Manager and Fraud Strand or

21

1 Iain Murphy. I then think that the role handed  
 2 over to, potentially, Andy Haywood and then  
 3 onwards from that, it's certainly about '10,  
 4 '11, going into '12, where I probably lack some  
 5 clarity around succession.  
 6 **Q.** Is it right, therefore, that you think you moved  
 7 to the crime, intelligence and administrative  
 8 function titled Grapevine in 2010?  
 9 **A.** I think it may have been later than that. If  
 10 I may, the piece that throws me is that there is  
 11 clearly, within the papers, a prosecution  
 12 decision made by myself, there is then  
 13 a prosecution report addressed to Iain Murphy  
 14 but then the decision precedes Iain Murphy, so  
 15 I'm confused there about the exact time that  
 16 Iain would have been in post and why it appears  
 17 I've ebbed and flowed out of that post.  
 18 **Q.** If we can have paragraph 20 on screen, please,  
 19 it's page 8. Scrolling down a bit, please,  
 20 about halfway down this paragraph. You refer to  
 21 Mr Murphy here and you say, in relation to the  
 22 Senior Security Manager in leading the Fraud  
 23 Strand, you think Mr Murphy held the position  
 24 throughout 2010. So what do you think you were  
 25 doing in 2010?

23

1 Security Operations Manager, the title, it  
 2 seems, varying depending on the terminology used  
 3 to describe this strand of the Security Team; is  
 4 that right?  
 5 **A.** Correct.  
 6 **Q.** Is it right that it was in this role as a Senior  
 7 Security Manager leading the Fraud or Security  
 8 Operations strand of the Security Team, that you  
 9 made decisions on prosecutions as the nominated  
 10 representative?  
 11 **A.** I believe so, yes.  
 12 **Q.** A position that we've also heard referred to as  
 13 the designated prosecuting authority?  
 14 **A.** Correct.  
 15 **Q.** You say that your training continued when you  
 16 held these roles, and you qualified as  
 17 a Proceeds of Crime Act Senior Appropriate  
 18 Officer; is that right?  
 19 **A.** It is.  
 20 **Q.** At paragraph 20 of your statement, you suggest  
 21 that Iain Murphy was the Fraud Strand leader for  
 22 a period throughout 2010 and you think he was  
 23 your successor; is that right?  
 24 **A.** I do and, from recollection, this is where the  
 25 waters become muddied, so there would have been

22

1 **A.** That's the bit I'm really struggling to  
 2 recollect.  
 3 **Q.** You say in this paragraph that you think you  
 4 returned to Security Operations for a period in  
 5 2011; is that right?  
 6 **A.** Correct.  
 7 **Q.** But you say you had certainly taken up the  
 8 substantive Grapevine Senior Security Manager  
 9 role by 2012?  
 10 **A.** Correct.  
 11 **Q.** We'll come on to the detail of that role in due  
 12 course. Finally, for around nine months before  
 13 you left the Post Office in late 2014, you say  
 14 you were removed from your role, and you deal  
 15 with this at paragraph 22(v) of your statement.  
 16 It's page 12, please.  
 17 You say:  
 18 "Around 9 months or so before I left in late  
 19 2014, I was effectively being removed from my  
 20 role and asked to design a structure that would  
 21 again support a reduction in headcount as well  
 22 as accommodate my departure. I wasn't exactly  
 23 placed on gardening leave, but my operational  
 24 career with Post Office was at an end and I was  
 25 more or less omitted from all other activity."

24

1 Restructuring and repeated reductions in  
2 headcount feature in a number of places in your  
3 statement. Could we go back, please, to page 6  
4 of the statement, to paragraph 17. Here you say  
5 this:

6 "There followed a further series of team  
7 restructures, building moves and boundary moves.  
8 The function throughout the years if not decades  
9 always struck me as an easy target to drive  
10 headcount reduction. Indeed, later in my career  
11 I was performing the role of consultation  
12 manager for a long serving colleague who had  
13 been subject to redundancy. I was to follow  
14 a party line around change being a business  
15 necessity ... when the colleague abruptly  
16 stopped me and proceeded to produce a piece of  
17 paper and recount the 14 restructures they had  
18 been personally impacted by since joining the  
19 Post Office -- the majority in the Security  
20 field. That was the regularity of structure  
21 change."

22 You address this theme further at  
23 paragraph 30 of your statement. Could we go to  
24 that, please. It's page 14. You say here:

25 "Function changes could be significant.  
25

1 support to counter and evidence suspected  
2 employee theft."

3 This retrograde step had a direct impact on  
4 subpostmasters who experienced an apparent loss  
5 in branch and suspected their staff of theft,  
6 didn't it?

7 **A.** Absolutely.

8 **Q.** Was it a step taken to save money?

9 **A.** Yes, it was.

10 **Q.** To your knowledge, where there was a shortfall  
11 in a subpostmaster's branch and the evidence  
12 pointed to theft on the part of a member of  
13 a subpostmaster's staff, was it the Post  
14 Office's approach to seek to recover the  
15 shortfall under the subpostmaster's contract?

16 **A.** On every occasion.

17 **Q.** Before the resourcing change you address at  
18 paragraph 43, would the Post Office have  
19 prosecuted the staff member and sought to  
20 recover the money from them directly through the  
21 criminal courts?

22 **A.** From memory, yes. So the logical steps that  
23 would be taken would be an out-of-hours onsite  
24 meeting with the subpostmaster, a review of the  
25 trading accounts, at which that stage would be

27

1 I seem to recall organisational charts with 80  
2 or so colleagues, quickly depleted over the  
3 years. There were several significant changes  
4 that led to sizeable redundancies, strand  
5 renaming and functional job titles changing."

6 Do you think that the depletion of numbers  
7 within the Security team had a detrimental  
8 impact on the adequacy and sufficiency of  
9 investigations.

10 **A.** Without a shadow of a doubt.

11 **Q.** One example you give in your statement of  
12 resourcing changes impacting upon the scope of  
13 investigation work is at paragraph 43. Could we  
14 have that on screen, please. It's page 18. You  
15 say:

16 "There was also a period when resources  
17 would have been applied to suspected thefts from  
18 SPMR assistants. By this I mean cash thefts and  
19 not simply fraud against customers and/or  
20 clients. This ceased when I was new in role and  
21 ended with the transition of Districts to  
22 Regions that I mention earlier in the statement.  
23 On an aside, I do think that was a retrograde  
24 step as it left SPMRs isolated and with the  
25 unenviable task of attempting to engender police

26

1 paper based, daily and weekly trading accounts  
2 and then, logically, there would ordinarily  
3 be -- a covert camera would be installed at  
4 branch.

5 When we referred to the stage when I was the  
6 liaison officer, that would be another element  
7 of my role. I would view the ensuing video  
8 product, as and when theft was identified -- and  
9 I must add, in the majority of cases, theft was  
10 identified -- and that product would be passed  
11 into the Post Office Investigation Department  
12 for their direct investigation.

13 **Q.** Was a material factor in the resourcing change  
14 a view within the Post Office that it was easier  
15 to recovery money from a subpostmaster under  
16 their contract than to go after the thief  
17 directly?

18 **A.** I think element, yes, but I think the primary  
19 driver, which has already been touched on, is  
20 that that is undoubtedly a resource-hungry  
21 approach and a decision was taken some way above  
22 my pay grade that that was no longer a suitable  
23 application of investigation resource.

24 **Q.** Were you or your colleagues ever consulted about  
25 business restructures or reductions in

28

1 headcount?

2 **A.** So if I can just break that down. In terms of  
3 consultation, we would be very much handed the  
4 *fait accompli*. So I tended to take a lead on  
5 the majority of the restructures once I reached  
6 a suitable grade. You would be told that there  
7 would be a number of hours and an associated  
8 financial cost that had to be lost from the  
9 function, and I would go away and work with  
10 other strand leads and with the Head of Security  
11 about repopulating a function that would achieve  
12 those cost reduction demands.

13 **Q.** Did you ever raise concerns about the impact of  
14 restructuring or headcount reductions with your  
15 seniors?

16 **A.** Absolutely.

17 **Q.** Can you elaborate on that?

18 **A.** There was a step taken on every occasion that it  
19 was better to put your hand up and volunteer to  
20 lose resource, rather than wait for the business  
21 to come after you and demand that that resource  
22 be left -- be reduced. So we would always be on  
23 the front foot of almost offering up resource.  
24 And, to my mind, there was no correlation  
25 between the resource we were offering up and the

29

1 increase the demand on an investigation function  
2 because of wrongdoing. So there's a complete  
3 anathema there that that then would then lead to  
4 a function that's reducing in size because  
5 obviously activity would have to cease.

6 **Q.** What was the response of those you raised  
7 concerns with?

8 **A.** We marched on regardless and we lost the heads  
9 accordingly.

10 **Q.** I'm sorry, can you say that last bit again?

11 **A.** We marched on regardless and we lost the heads  
12 accordingly.

13 **Q.** What was it that led to you being removed from  
14 your role nine months before your departure?

15 **A.** I said removal: so this is not a physical  
16 removal. This was just -- you just sense and  
17 you know that you are being omitted from future  
18 plans, from future strategic development. So  
19 I'd still be within the workplace but it's just  
20 a sense, isn't it? You just know that, I guess,  
21 you know, my light was about to extinguish and  
22 that I was -- by that stage I'd had a leaving  
23 date from the business and that I knew that  
24 I would be leaving that business imminently.

25 **Q.** Did you get any impression of why it was that

31

1 demands on the function in terms of the numbers  
2 of cases that were being raised and the demands  
3 on individual Investigators. And I think both  
4 myself and other senior security personnel had  
5 some real concerns about the functions that were  
6 being lost and the increased demands that were  
7 being placed on Investigators, particularly as  
8 a result.

9 Obviously, there were other functions of the  
10 Security family that were being impacted but  
11 certainly on the operational Investigators.  
12 Because it just -- it followed no logic, you  
13 know. This was not a function that was  
14 experienced in less caseload. There were some  
15 significant changes going on for subpostmasters  
16 during this time. UK Plc were changing in the  
17 way that they were customers of the Post Office,  
18 so that gone were the days when customers would  
19 queue up every quarter to pay a phone bill or  
20 a gas bill, or queue up every six months to pay  
21 a car tax.

22 The result of that is that, in my opinion  
23 and fact, is that subpostmasters' salaries were  
24 reducing year on year. That increased the  
25 financial demand. Logically, that could

30

1 this plan for you had been formed?

2 **A.** I think it was common practice, to be honest.  
3 I'd seen it before with other peers, that once,  
4 if you want, they were out of favour, that there  
5 would be almost a discarding of them, they were  
6 no longer seen to be useful and that it was just  
7 a matter of time until they exited the business  
8 and the function just continued.

9 **Q.** Do you know why you were out of favour?

10 **A.** I think we use an expression, don't we, about  
11 falling out of love. I was incredibly proud of  
12 my Post Office career. I was proud of the  
13 things that I'd achieved, the way that I'd  
14 developed personally and professionally.

15 I became tired with the prevailing culture.  
16 I became more conscious of the impact that the  
17 culture was having on both my peers' direct  
18 reports and direct reports to direct reports.  
19 I became more sensitive as an individual, in  
20 that the decisions that we were quite coldly  
21 making were having significant personal impacts  
22 on individuals, and I think it's probably fair  
23 to say that it's a culture I wanted to step away  
24 from.

25 With hindsight -- and hindsight's always

32

1 20:20 -- it's probably a decision that I should  
 2 have taken some years previously.  
 3 **Q.** You also say at paragraph 20 of your statement  
 4 that you have an issue with several prosecution  
 5 decision-making activities and subsequent  
 6 inputs, which you address later in your  
 7 statement. We'll come on to those parts of your  
 8 statement in more detail in due course but,  
 9 broadly speaking, do these relate, in the main,  
 10 to the messaging of the Post Office around the  
 11 reliability of the Horizon system?  
 12 **A.** No.  
 13 **Q.** No. What do the concerns or did the concerns  
 14 with the prosecution decision-making activities  
 15 and subsequent inputs relate to?  
 16 **A.** I think it's a -- sorry, if there's any  
 17 confusion. I think it refers to the continuity  
 18 of my involvement once the decision had been  
 19 made.  
 20 **Q.** Can you explain that a little more?  
 21 **A.** Absolutely. So, yes, I could have been in that  
 22 post. Again, we come to that 2010/11 when  
 23 a decision has been made. Again, without  
 24 a definitive suite of organisational charts,  
 25 I don't know when I would have left that role.

33

1 which I guess is somewhat distasteful, but  
 2 we'd -- irrespective of the support that we'd  
 3 give an individual. So this was all -- if you'd  
 4 look at the Investigator, this was always a role  
 5 that it was accepted there would be  
 6 a significant lead-in time to perform  
 7 competently. But there would be an expression  
 8 that would be used if an individual was "tackle  
 9 shy", and what that would translate to is that  
 10 an individual could not quite get over that  
 11 hurdle of making introductions to a suspect,  
 12 sitting them down, performing a competent  
 13 interview, if that whole part of the process  
 14 just filled them with so much turmoil because of  
 15 what they were facing, that they just couldn't  
 16 perform the role effectively.

17 I know of at least two, if not three  
 18 individuals, who, probably even after the  
 19 probationary period, we had to draw a line in  
 20 the sand, almost, with one of them, for their  
 21 own benefit, to say "This clearly is not  
 22 working, you're full -- you know, the anxiety  
 23 that you're exhibiting, you know, even with the  
 24 thought of sitting somebody down and  
 25 interviewing them is so much so that, you know,

35

1 So a decision could be made, there then could,  
 2 say, be a request for further evidence or there  
 3 could be a twist and turn in that  
 4 decision-making process. I may not have been in  
 5 post then to actually see that through to  
 6 fruition.  
 7 **Q.** You refer at paragraph 19 of your statement to  
 8 having worked with some individuals at the Post  
 9 Office who were highly capable and committed to  
 10 doing their role to the best of their ability,  
 11 and others who were less so and would be managed  
 12 accordingly. Can you recall any examples of an  
 13 individual being less capable and committed to  
 14 their role?  
 15 If I can ask you to pause there.  
 16 *(Pause for fire alarm)*  
 17 Our apologies for that interruption.  
 18 My question before the alarm was: can you  
 19 recall any examples of an individual being less  
 20 capable and committed to their role, with the  
 21 effect that they were managed?  
 22 **A.** Absolutely, yes.  
 23 **Q.** Would you share those with us or an example with  
 24 us?  
 25 **A.** Absolutely. So we used to use an expression,

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1 the view is taken that the role is not going to  
 2 be for you". And that happen on at least two  
 3 occasions, if not three.  
 4 **Q.** Could we have on screen, please, paragraph 13 of  
 5 Mr Pardoe's statement, this page 4. So this is  
 6 going back to the period in time in relation to  
 7 your training that you received when you were  
 8 an Assistant Investigator, so the bottom of  
 9 paragraph 12 before there, and at paragraph 13  
 10 you say this about your training:  
 11 "This period saw me receive significantly  
 12 more training both formally and informally.  
 13 It's difficult to recall the timeline, but at  
 14 various stages in an operational role I received  
 15 classroom investigative training, internally and  
 16 externally delivered courses around search  
 17 awareness (using Metropolitan Police  
 18 facilities), interviewing course with Lancashire  
 19 Constabulary, PACE training, RIPA awareness and  
 20 CPIA awareness. Elements such as PACE, RIPA,  
 21 HRA and CPIA were supplemented with various  
 22 materials that were intended for retention.  
 23 PACE and CPIA Codes of Practice would have been  
 24 available within every interview kit. I still  
 25 recall having the codes in my investigation kit.

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1 In my Post Office career, I also studied and  
2 passed my Proceeds of Crime Act Senior  
3 Appropriate Officer. This was a pass fail  
4 one-week course delivered by the National Police  
5 Improvement Agency."

6 The training you describe here, with the  
7 exception of your POCA training, was this all  
8 training you received as an Investigator  
9 pre-Horizon?

10 **A.** From memory, yes, and, logically, it would have  
11 been.

12 **Q.** So at the time you were an Investigator, you  
13 recall there being copies of the PACE and CPIA  
14 Codes of Practice available in an interview kit;  
15 is that right?

16 **A.** So CPIA, you need to refresh my memory, is that  
17 '97, is it?

18 **Q.** '96.

19 **A.** '96, then, yes, there would have been.

20 **Q.** What was an interview kit?

21 **A.** So an interview kit would be a ring binder,  
22 similar to the one I've got in front of me, you  
23 would have witness statements in there, you'd  
24 have bank authority disclosures blanks in there.  
25 You'd have the introduction to tape recorded

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1 Investigators and then new hires to the function  
2 traditionally would have been given that through  
3 their formal training.

4 **Q.** You refer at paragraph 35 of your statement to  
5 a suite of policies and procedural standards,  
6 listing the legislation and codes you refer to  
7 at paragraph 13 here. Where was this suite of  
8 policies and procedural standards held and how  
9 would Investigators access this material, so  
10 both when you were an Investigator and later,  
11 when you were a Senior Security Manager?

12 **A.** I think, from memory, it was electronic.

13 **Q.** Was there an electronic repository for training  
14 materials which Investigators could access in  
15 the same way as that suite of policy documents  
16 could be?

17 **A.** I seem to recall that there was.

18 **Q.** You don't mention the Attorney General's  
19 Guidelines on disclosure at paragraph 13 of your  
20 statement, which may be explained because you're  
21 referring there to training pre-Horizon, so  
22 pre-2000, but when you were in the roles you  
23 held after you stopped conducting investigations  
24 yourself, were you aware of the Attorney  
25 General's Guidelines on Disclosure?

39

1 interviews. Logically, you'd have the most  
2 up-to-date copy of PACE, you'd have the CPIA  
3 Codes of Practice. You may carry with you the  
4 Police Almanac, as well, in there. So there'd  
5 be a variety of blank templates that could be  
6 useful for any particular investigation activity  
7 along with the Codes of Practice and Police  
8 Almanac.

9 **Q.** How was this kit used? Where did you take it?

10 **A.** Everywhere with you. So if you were going out  
11 doing an operational investigation that could  
12 have resulted in an interview under caution, we  
13 would use a two-tape Neal tape recorder and, as  
14 well as the tape recorder with you, you would  
15 carry -- I think the vernacular was the "tackle  
16 kit", you would carry this kit with you. So,  
17 traditionally, it would have been kept in the  
18 boot of Investigators' cars, ready to be used on  
19 various operational activities.

20 **Q.** When you were a Senior Security Manager, were  
21 Investigators still provided with copies of the  
22 PACE and CPIA Codes of Practice and an interview  
23 kit?

24 **A.** Absolutely. So if there'd been any change to  
25 that, that would have been given to existing

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1 **A.** I was aware of them, yes, but I'm struggling to  
2 recall what format they would have been  
3 available to the Investigators.

4 **Q.** Do you think they were available to  
5 Investigators or not?

6 **A.** I couldn't answer that with absolute accuracy,  
7 unfortunately.

8 **Q.** Both when you were an Investigator and when you  
9 were a Senior Security Manager, was there any  
10 method for updating Investigators about changes  
11 in the law or applicable codes or guidance?

12 **A.** Yes, there was. So at earlier stages when we  
13 were still part of the Group, I seem to recall  
14 that would have been a group function, and then  
15 at later stages, I seem to recall that would  
16 have come through the Criminal Law Team.

17 **Q.** You deal in a little more detail with the  
18 training you had in interviews and search at  
19 paragraph 62 of your statement, and you make  
20 clear there that the courses you attended  
21 personally and reference in your statement may  
22 well have subsequently been made obsolete or  
23 replaced by other training interventions.

24 In particular, your training on  
25 investigative interviewing was done under

40

1 Lancashire Constabulary and your search course  
2 was led by the group trainers at the Met Police  
3 training college, using their search houses; is  
4 that right?

5 **A.** It is right, yes.

6 **Q.** Do you know whether that external provided  
7 training continued after the year 2000, so when  
8 you were in other roles?

9 **A.** I'm fairly sure that the relationship with Lancs  
10 Constab didn't continue. That was particularly  
11 looking at a piece model for investigative  
12 interviews. I'm fairly sure that didn't  
13 continue. The search awareness piece using Met  
14 Police facilities, I'm not sure about that one.  
15 I think there may have been -- it was a key area  
16 for Investigators. I think there may have been  
17 a replacement to that one. I'm unsure whether  
18 that continued to use Met facilities.

19 **Q.** You undertook some further academic learning  
20 yourself, didn't you, culminating in the  
21 completion of an MSc in security and risk  
22 management?

23 **A.** That's correct.

24 **Q.** Is it right that that was completed with the  
25 submission in September 2000 of an academic

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1 stolen money to travel the world watching  
2 Formula One. Subpostmaster who had stolen  
3 money, travelled Europe with a Michelin Guide to  
4 Fine Dining. So they were, at the top tranche  
5 highly, highly, acquisitive.

6 I dealt with a sub office assistant who was  
7 on the equivalent of minimum wage who was  
8 renting a Georgian manor house with a swimming  
9 pool. I still remember that with some clarity.

10 I remember disclosing that pre-interview with  
11 his legal representative and his legal rep  
12 actually put his head in the hands because  
13 I disclosed the estate agent's details to where  
14 his client was renting. So that's very much at  
15 the top tier.

16 The second category I've already touched on  
17 these, and these were absolute victims of us, as  
18 customers of the Post Office changing. My  
19 father was a subpostmaster, it's within the  
20 statement, he'd been a subpostmaster since the  
21 1950s. I remember talking to my father before  
22 he passed -- and that would have been in the  
23 2000s -- and he would tell me that in the 1960s,  
24 '70s, '80s, he enjoyed financial pay parity at  
25 a level that his professional acquaintances,

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1 study on the reasons why subpostmasters  
2 committed offences, including theft?

3 **A.** Correct.

4 **Q.** Was the study based on your experiences as  
5 an Investigator with the Post Office?

6 **A.** So it was partially that, and it was also  
7 through legitimised access to historic  
8 investigation reports and précis of interviews.

9 **Q.** What were the key themes covered in your study?

10 **A.** So the study looked at verbalisation and  
11 rationalisation, and it proposed that there were  
12 three main types of offenders that the Post  
13 Office were dealing with during that period.  
14 Would you like me to go through those, or?

15 **Q.** If you'd like to, yes.

16 **A.** Absolutely. So number 1, I think I detailed  
17 within the dissertation, were highly  
18 acquisitive, so these would include  
19 subpostmasters who had direct links with  
20 organised crime groups, or were being influenced  
21 by organised crime groups. I go into some  
22 details around that.

23 I particularly recall dealing with  
24 a subpostmaster who had stolen money to buy  
25 a Ferrari. I dealt with a subpostmaster who had

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1 doctors, dentists, lawyers, were also enjoying.  
2 That level of remuneration was completely  
3 changing. Postmasters were paid a form of  
4 commission, the more transactions that were  
5 conducted, the higher their salary would be and,  
6 year on year, salaries were dropping.

7 So that second tranche of individuals that  
8 I was actually talking about during the  
9 dissertation were purely forced into  
10 an offending cycle because they were seeing the  
11 Post Office salary reduce year on year.

12 And the Post Office, not too subtly, went  
13 away from saying to potential subpostmasters  
14 "Become a postmaster and have a fantastic  
15 standard of living, based solely on Post Office  
16 salary". They shifted towards saying, rather,  
17 "Become a postmaster because it's a fantastic  
18 opportunity to drive additional footfall into  
19 what should be your buoyant retail business".  
20 They are two completely different propositions.

21 And around about this period leading up to  
22 the dissertation, we were dealing with a number  
23 of subpostmasters -- I go on in my statement to  
24 say that we were dealing with repeat  
25 subpostmasters, at the same site on some

44

1 occasions, who were just simply victims of  
2 a dwindling Post Office remuneration without the  
3 benefit of a buoyant retail side to prop up the  
4 viability of that business.

5 So that was very much the second tranche.

6 At that time, there had been a number of  
7 rudimentary audit models that were being  
8 deployed, really basic models that had something  
9 I like a return rate of around about 70,  
10 80 per cent. I was running one myself in North  
11 West/North Wales.

12 So there was no machine learning or AI in  
13 these models, these were simple models, saying  
14 to an Area Manager "Report back if you go into  
15 a sub post office and the retail side is  
16 depleted of stock", "Report if you're going into  
17 a CTN" -- confection, tobacco, newsagents --  
18 "with a sub post office and there's no daily  
19 newspapers", because the newspaper suppliers put  
20 you on stop very quickly if you fail to pay your  
21 newspaper bills. And the return rate on that  
22 was absolutely staggering, that was  
23 an incredibly busy time for the Post Office.

24 That was tranche number 2.

25 Tranche number 3 would be individuals who  
45

1 see dawn on that individual that their downfall  
2 was wholly attributed to either theft by family  
3 member, theft by assistant, and you'd left that  
4 family at the end of the day in complete and  
5 utter turmoil.

6 And out of everything I dealt with within my  
7 Post Office career, that's the one thing that  
8 changed me as an individual, and probably not  
9 for the better, because I'd walk away from  
10 a situation and you'd just say "How can anybody  
11 willingly, knowingly, place an individual in  
12 this type of insidious position?" And  
13 I remember we dealt with -- it was quite ironic,  
14 we dealt with a whole series of cases where it  
15 was the younger son, youngest, and he would just  
16 absolutely, for want of a better word, pillage  
17 the Post Office; the older son would want to  
18 take all the blame for whatever reason; and it  
19 would -- there were just -- it was such  
20 a difficult series of investigations to deal  
21 with.

22 I say, I think, in the statement from  
23 memory -- I can't locate a copy of the  
24 dissertation, unfortunately -- but that was  
25 certainly a significant element of the three  
47

1 you would interview under caution, who would  
2 admit readily their involvement in falsification  
3 of, at the time, paper-based accounts but would  
4 deny wholeheartedly being responsible for the  
5 thefts. And I always found those the most  
6 difficult out of the three to deal with. I had  
7 very little sympathy or empathy with that top  
8 tier. If you're stealing money to buy a Ferrari  
9 or a Porsche, you deserve everything that's  
10 coming your way. I had sympathy with the second  
11 tranche, who were victims of a change in UK Plc  
12 and changing model of remuneration.

13 But that third bit was incredibly difficult  
14 to deal with because it felt like, if I was to  
15 believe the account, and on many occasions I did  
16 believe the account, it became evident that, as  
17 you were dealing with that individual, you'd go  
18 through the mechanics of the tape recorded  
19 interview and our average interview duration  
20 would be around about 45 minutes, and they  
21 tended, as ironic as it sounds to be quite  
22 cordial and, if you were sat down after that  
23 interview, and you'd have refreshments whatever,  
24 you'd outline the next steps around suspension,  
25 transfer of office, you would slowly start to  
46

1 tranches.

2 I then break it down -- just to come to  
3 an end -- I break it down to a difference  
4 between male and female offending as well, at  
5 the time. We found very little females who were  
6 in that top tranche, where the thefts were  
7 purely just for greed. We found more in  
8 categories 2 and 3, and that's a brief summary  
9 of the dissertation.

10 **Q.** The title of your study was "There must be some  
11 mistake". Is it fair to say that your study was  
12 proceeding on the premise that there was no  
13 mistake?

14 **A.** Absolutely. Absolutely, yes. I think it was  
15 more -- well, it was actually -- somebody  
16 actually said that to me, so when we sat down  
17 and they were logically asking about next steps,  
18 and you would go through, quite legitimately --  
19 there'd be nothing outside of PACE, outside of  
20 a captured recorded interview, you'd go through  
21 the logical next steps. So "The logic is you'll  
22 be suspended from duty, you'll be asked to offer  
23 your premises to an interim subpostmaster, the  
24 arrangements between you and them as regards  
25 rent is a private matter between you and them",  
48

1 so on and so on, and an individual actually said  
 2 to me, "There's just got to be some mistake".  
 3 **Q.** You say in your statement at paragraph 22(iii)  
 4 that training continued when you were a Senior  
 5 Security Manager. What training did you receive  
 6 when you were a Senior Security Manager in  
 7 addition to the POCA training?  
 8 **A.** Can I see that paragraph for context, please?  
 9 **Q.** Yes. It is page 11 of the document on screen --  
 10 **A.** Thank you.  
 11 **Q.** -- and subparagraph (iii).  
 12 **A.** Thank you. I've got that one, thank you. So,  
 13 save for the POCA Senior Appropriate Officer,  
 14 I think there was some additional training on  
 15 evidence in court. I think I probably just  
 16 tagged along to that one because I had team  
 17 leaders who were attending and a number of  
 18 Investigators.  
 19 It's fair to say that there would have been  
 20 less formal operational training at that time  
 21 because, at that time, I'd moved away from  
 22 day-to-day operational investigation activity.  
 23 **Q.** At paragraph 63 of your statement, you say that  
 24 all Investigators would have received  
 25 instruction in the use of Horizon. Did you

1 **A.** Again, could I see that part of the statement?  
 2 **Q.** Yes, it's page 25.  
 3 **A.** Yeah, so that would have been Investigators  
 4 within the function. That would not have been  
 5 applicable to myself.  
 6 **Q.** Did you ever provide any training to  
 7 Investigators?  
 8 **A.** Me personally?  
 9 **Q.** Yes.  
 10 **A.** Not from recollection, no.  
 11 **Q.** Did you attend the training provided to  
 12 Investigators?  
 13 **A.** Again, from recollection, yes, I think at that  
 14 time Post Office had a bespoke training facility  
 15 just outside Rugby. I certainly seem to recall  
 16 going there. It may not have been for the full  
 17 duration but, certainly, those training courses  
 18 which were residential in nature, members of the  
 19 senior security group would drop into that  
 20 training at various times within that training  
 21 week.  
 22 **Q.** Scrolling down a little, please, to  
 23 paragraph 64. You say here that:  
 24 "Formal training would have been  
 25 supplemented with significant levels of

1 receive instruction or training in the use of  
 2 Horizon?  
 3 **A.** I did indeed, and I think I've referred to  
 4 earlier, I know, for whatever reason, I absented  
 5 the formal training session, but I seem to  
 6 recall, on a one-to-one basis, we had a number  
 7 of counter training schools across the UK. I'm  
 8 not sure whether I didn't actually go to Chester  
 9 to actually have some one-to-one training just  
 10 to gain a brief overview.  
 11 We'd also at that time as well -- yes, we  
 12 would, so during the various bouts of CWU  
 13 industrial action, as Senior Managers we would  
 14 be expected to work at Crown branch offices. So  
 15 I'd have undertaken Horizon activities then,  
 16 firsthand dealing with customers.  
 17 **Q.** You also say at paragraph 63 that you would have  
 18 envisaged case file construction training for  
 19 Investigators, including obtaining evidence from  
 20 third parties, but you say you don't recall any  
 21 specific reference to Horizon data. Just to be  
 22 clear, are you talking about your recollection  
 23 of the training you received or the training  
 24 that was provided to Investigators operating  
 25 under your lead?

1 supervision in terms of operational activity and  
 2 case paper construction and submission. This  
 3 was a role that traditionally had a longer lead  
 4 in time given the uniqueness of activity  
 5 undertaken."  
 6 We've looked at an earlier paragraph of your  
 7 statement where you stress that you had a high  
 8 level of supervision when you started  
 9 investigatory roles. Was that the case for  
 10 Investigators operating under your lead  
 11 throughout the time you were in Security  
 12 Operations?  
 13 **A.** I think probably a lot of my experiences were by  
 14 virtue of the person who was being mentored at  
 15 the time. I can't imagine many of the new  
 16 Investigators would see a written report  
 17 underlined in red and thrown across the room to  
 18 them. I think it was probably just by virtue of  
 19 different era, a different type of personality  
 20 that I was being mentored with at the time, who  
 21 certainly wouldn't hold back from niceties of  
 22 giving you a constructive sandwich, in terms of  
 23 feedback. The casework literally would be  
 24 physically thrown back at you and you were told  
 25 to sort out if there were grammatical issues

1 within the paperwork, or anything of a similar  
2 ilk.

3 But I nevertheless -- remove the differences  
4 in decades to one side, I would expect that new  
5 incumbents would have had a decent level of  
6 supervision. It was always recognised, if you  
7 weren't coming into the function from  
8 an investigative or policing background, this  
9 was not a function that you were expected to be  
10 up on your feet in a short few months. It was  
11 a completely unique role and there was some  
12 cognisance and allowance given for that fact.

13 **MS PRICE:** Sir, I've finished one topic and I wonder  
14 whether that might be a convenient moment for  
15 the morning break, just a short 15-minute break,  
16 if we may, please.

17 **SIR WYN WILLIAMS:** Yes, sure.

18 **MS PRICE:** I don't know what your watch says, sir,  
19 the clock here is a little fast on counsel's  
20 table.

21 **SIR WYN WILLIAMS:** Well, it's actually 10.26  
22 according to me, so 10.40?

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

24 **(10.27 am)**  
25 **(A short break)**  
53

1 something instinctively that you were aware of,  
2 if a case had been produced where there was that  
3 *prima facie* evidence of wrongdoing, then it  
4 would go up to Criminal Law Team for the advice  
5 as regards the prospect of realistic prospect of  
6 conviction, in terms of prosecution.

7 **Q.** Were you aware of any discussions within the  
8 Security Team in the context of action against  
9 Post Office employees or agents about the  
10 deterrent effect of prosecution?

11 **A.** Absolutely, yes.

12 **Q.** What was the substance of those discussions?

13 **A.** So there was a period in the function where the  
14 function started to rely quite heavily on  
15 academic underpinnings. If you look at the  
16 conditions that exist to entailing what's  
17 referred to as a motivated offender, one of  
18 those things that needs to be in presence is  
19 the -- what's called the absence of a capable  
20 guardian, and that can be a physical individual,  
21 an entity that stops you from doing something.

22 Likewise, it was recognised that a policy  
23 that was unwavering in its approach towards  
24 prosecution could act as that capable guardian  
25 but then, hopefully, would influence correctly  
55

1 **(10.41 am)**  
2 **MS PRICE:** Hello, sir. Can you see and hear us?  
3 **SIR WYN WILLIAMS:** Yes, thank you, yes.  
4 **MS PRICE:** Mr Pardoe, in terms of policy, when you  
5 first started as an Investigator, were you given  
6 a copy of any documents setting out the Post  
7 Office Prosecution Policy?  
8 **A.** I suspect I must have been. I don't have that  
9 detail of recollection but, logically, I must  
10 have been given that policy. If I may, I think  
11 that was a group policy at the time. So yes,  
12 I would have been given that policy.

13 **Q.** Did anyone cover what the prosecution policy was  
14 in your initial training or set out a rationale  
15 for it?  
16 **A.** Again, initial training, I don't recall,  
17 unfortunately, that level of detail. I'd be  
18 surprised if it wasn't touched upon but I don't  
19 recall the specifics, sorry.

20 **Q.** Later, when you were a Senior Security Manager,  
21 do you recall any discussion of the prosecution  
22 policy and the rationale for it or were you  
23 given any briefing about that?  
24 **A.** I think, by that stage, I'd have been in the  
25 function for some time. It would have just been  
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1 those individuals who may be tempted to commit  
2 wrongdoing against the business. And I think  
3 it's probably fair to say that that was being  
4 recognised, during that time, as being something  
5 that was important to set the scene, set the  
6 standard and, as I say, act, as that  
7 policy-driven capable guardian.

8 **Q.** To what extent was this a relevant factor for  
9 those making decisions, including you, on  
10 whether or not to prosecute?  
11 **A.** I don't know if that actual element would be  
12 a relevant factor and I know I cover it in the  
13 statement. From my perspective, offering that  
14 sign-off towards prosecution, wrongly or  
15 rightly, I suspect for me -- and I suspect other  
16 signatories in the period as well -- was almost  
17 a *fait accompli*, dependent on what the Criminal  
18 Law Team were actually advising.

19 I never felt in a position, certainly not  
20 professionally, to go into absolute battle with  
21 Criminal Law Team around a decision that they'd  
22 made in terms of prosecution.

23 **Q.** At any point that you had involvement in Post  
24 Office investigations and prosecutions, did you  
25 understand that the Post Office was unusual, in  
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1 that it was the alleged victim of the crimes  
2 which it investigated, it investigated such  
3 suspected crimes itself and it decided whether  
4 to prosecute such suspected crimes itself?

5 **A.** Absolutely, and I think, if I recall, that was  
6 covered at various iterations of formal training  
7 that would have been given to Investigators.

8 **Q.** So it was victim, investigator and prosecutor?

9 **A.** Correct.

10 **Q.** At the time, were you conscious of the risks  
11 that may arise on account of the Post Office  
12 being simultaneously victim, investigator and  
13 prosecutor?

14 **A.** With honesty, not at the time, but obviously  
15 I am now.

16 **Q.** When you look at it now, do you see the risk  
17 that might attach in particular to the Post  
18 Office's disclosure obligations as a prosecutor  
19 or its use of expert evidence?

20 **A.** Absolutely.

21 **Q.** Were these risks ever discussed within the  
22 Security Team, as far as you're aware?

23 **A.** Never.

24 **Q.** Were they acknowledged in any Post Office or  
25 Royal Mail policy that you have seen?

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1 you actually deal with that type of case. No,  
2 there was nothing.

3 **Q.** Did you consider, at the time you worked within  
4 the Security Team, the extent to which  
5 prosecutions served the Post Office's broader  
6 commercial interests, such as the reduction of  
7 debt and the increase of income?

8 **A.** Not so much that, no. But, certainly, to go  
9 back to the earlier point, that whole concept of  
10 capable guardian, ie something that exists that  
11 hopefully drives individuals to keep, as we saw  
12 at the time, onto the straight and narrow, I saw  
13 that as being more paramount than a focus on  
14 actually balancing recovery versus loss in that  
15 commercial way.

16 **Q.** The Inquiry has heard evidence that in late 2005  
17 you put Paul Whitaker and Mick Matthews forward  
18 for a new role for the Security Team, that of  
19 Financial Investigator; is that right?

20 **A.** Paul Whitaker?

21 **Q.** Paul Whitaker and Mick Matthews. It was  
22 Mr Whitaker's evidence that you had put him and  
23 Mr Matthews forward for a new role in the  
24 Security Team, the Financial Investigator role,  
25 in around late 2005?

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

2 **Q.** Were any particular steps taken, to your  
3 knowledge, in recognition of these risks by way  
4 of training for Investigators, first of all?

5 **A.** In terms of -- sorry, can you just expand on  
6 that, please?

7 **Q.** Were any steps taken, to your knowledge, in  
8 recognition of these risks in training for  
9 Investigators?

10 **A.** Not to my knowledge, no, other than obviously  
11 going through the mechanics of case preparation.

12 **Q.** Were any particular steps taken in your training  
13 in relation to being a prosecution decision  
14 maker?

15 **A.** So I recall being given guidance during a period  
16 when I was acting for one of the security leads,  
17 so I wouldn't have been promoted substantively  
18 to the level of signing those off. I remember  
19 acting for a period and I also remember  
20 discussions around responsibilities with one or  
21 other of the principal lawyers within the  
22 Criminal Law Team at the time.

23 But, certainly, there was no -- nothing  
24 I could point to that said this was a formal  
25 training brief or formal *aide memoire* about how

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1 **A.** I don't actually recall that; I mean, obviously  
2 I know the individuals. I don't recall  
3 Mr Whitaker being put forward for that role.

4 Thought at the time there would have been Ged  
5 Harbinson --

6 **Q.** Apologies, this is entirely my fault: Ged  
7 Harbinson?

8 **A.** Yeah, absolutely, yeah. Mr Harbinson, yes,  
9 definitely.

10 **Q.** Mr Harbinson provided evidence that this new  
11 role was campaigned for by you; is that right?

12 **A.** No, I wouldn't -- there's absolutely no way in  
13 my wildest dreams I'd have had that amount of  
14 influence within the business to actually design  
15 and to populate a role like that. Absolutely  
16 not, no. There would have been -- I thought  
17 those functions existed within Group.

18 There would have been perhaps a role that  
19 I had in the design of a Post Office structure  
20 that had to map over those roles from Group to  
21 a self-sufficiency within Post Office Limited,  
22 if that makes sense, but I didn't see any of the  
23 Exec boarding or the type of levers you'd need  
24 to exact to populate those roles and commission  
25 or canvass for those roles to exist within the

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1 Post Office, certainly not.

2 **Q.** Do you recall the introduction of that new role  
3 of financial investigation?

4 **A.** I do.

5 **Q.** Was the intention to recoup losses through the  
6 Proceeds of Crime Act?

7 **A.** It was.

8 **Q.** So before you took up the role of taking  
9 prosecution decisions, the business desire to  
10 recover losses was something you were aware of  
11 and involved, as a Senior Appropriate Officer;  
12 is that right?

13 **A.** It was.

14 **Q.** Does it remain your position that commercial  
15 considerations were not something you were  
16 conscious of when taking prosecution decisions?

17 **A.** I never saw those as being paramount.

18 **Q.** Do you see here a potential for a conflict of  
19 interest arising?

20 **A.** Yes, most definitely.

21 **Q.** While we are on the topic of financial  
22 investigation and recovery, you say in your  
23 statement at paragraph 27 -- if we can have that  
24 on screen, please, that's page 13, about halfway  
25 down -- that John Scott, Head of Security, had

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1 policy. The "Purpose" is set out at the top, it  
2 describes the:

3 "... Royal Mail Group Limited response to  
4 crime and suspected crime against the  
5 organisation."

6 If we can look, please, at point 4 on page 4  
7 of this document, under "Deployment", it says:

8 "This Policy is published on the Royal Mail  
9 intranet site as policy number S2."

10 When you worked within the Security Team,  
11 did you have access to the Royal Mail intranet  
12 site?

13 **A.** I don't recall that, sorry.

14 **Q.** You don't recall whether you did or you don't  
15 recall having access?

16 **A.** I don't recall whether I had access to the Royal  
17 Mail intranet site.

18 **Q.** You say you don't specifically recall this  
19 document. Do you think you read it at the time  
20 that it applied to the work of your team?

21 **A.** I would have been surprised if I hadn't.

22 **Q.** Taking some of the principles set out in this  
23 policy and starting with paragraph 3.1.4, that's  
24 back a page, please -- and again, and again --  
25 under "Conduct of Investigations":

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1 overarching responsibility for the strategy  
2 around recovery and you say here you recall  
3 conversations with him around calculations  
4 concerning recoverable amounts in defendants'  
5 benefit.

6 You recall a specific challenge raised by  
7 the National Federation of SubPostmasters around  
8 the calculation of the recoverable amount in  
9 a particular case. Can you help with what it  
10 was that was being challenged?

11 **A.** I seem to recall that the calculation that was  
12 being applied had resulted in confiscation of  
13 an amount some way in excess of the Post Office  
14 loss.

15 **Q.** You refer at paragraph 34 of your statement to  
16 three Royal Mail Group policies which would have  
17 come across your desk, as you put it, and,  
18 whilst you do not specifically recall them, you  
19 say would have been applicable to your team.  
20 One of these is the December 2007 Royal Mail  
21 Group Limited Criminal Investigation and  
22 Prosecution Policy.

23 Could we have that on screen, please. The  
24 reference is POL00030578. This is, as you have  
25 noted in your statement, a Royal Mail Group

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1 "The conduct, course and progress of  
2 an investigation will be a matter for the  
3 investigators as long as it is within the law,  
4 rules and priorities of the business.  
5 Investigators will ultimately report to the  
6 Director of Security with regard to the conduct  
7 of criminal investigations."

8 So this document here was not purporting to  
9 give any guidance to Investigators about how  
10 they should conduct an investigation, was it?

11 **A.** Correct.

12 **Q.** Some legislation is identified within this  
13 policy, so, for example, under 3.2.2, please, on  
14 page 2, you can see there:

15 "Evidence will be gathered and retained in  
16 accordance with the Criminal Procedure and  
17 Investigations Act 1996 Codes of Practice."

18 Under 3.2.8 on "Casework" -- this is page 3,  
19 and under "Casework":

20 "Investigations leading to potential  
21 prosecution will be reported in accordance with  
22 the Criminal Procedure and Investigations Act  
23 1996 [and the] Code of Practice."

24 There's no explanation in this document, is  
25 there, about the requirements that are set down

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1 by the Act and the Code, is there?

2 **A.** Absolutely none whatsoever.

3 **Q.** There is some suggestion the detail might be  
4 contained elsewhere, going back to the section  
5 on deployment, that's page 4, section 4. It  
6 says:

7 "Investigation Procedures and Standards  
8 relating to this policy are included in the  
9 induction and ongoing training courses and  
10 material provided to investigators. Any changes  
11 to the procedures and standards are notified to  
12 investigators via investigation circulars and  
13 communications."

14 There is also a specific section applicable  
15 to the Post Office, paragraph 3.2.12, just above  
16 section 4, which applies to "Post Office Limited  
17 Investigation":

18 "While adhering to legislative and group  
19 policy requirements, the POL Investigation Team  
20 have additional and, in some cases, alternative  
21 Procedures and Standards, and supporting  
22 documentation with which Post Office Limited  
23 colleagues will comply. Post Office Limited  
24 Investigation Team will maintain a separate  
25 casework procedure and database."

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1 **Q.** Do you think, looking back, that this might have  
2 reflected a mindset that, if there was, on the  
3 face of things, a loss, a subpostmaster or  
4 employee was guilty of theft, fraud or false  
5 accounting?

6 **A.** I think there was an element of groupthink in  
7 that, yes, I do.

8 **Q.** Moving then to paragraph 3.2.9 on page 3,  
9 "Prosecution":

10 "Suspect offenders will be prosecuted where  
11 there is sufficient evidence and it is in the  
12 public interest in accordance with the Code for  
13 Crown Prosecutors. Decisions to prosecute in  
14 non-Crown Prosecution Service cases will be  
15 taken by nominated representatives in the  
16 business with consideration to the advice  
17 provided by the Royal Mail Group Criminal Law  
18 Team."

19 In relation to responsibility for deciding  
20 whether to prosecute an individual or not, we  
21 can see the position, as set out here, is that  
22 the decision would be taken by the nominated  
23 representatives in the business, consideration  
24 to the advice from the Criminal Law Team. This  
25 is in 2007.

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1 Do you recall there being a separate  
2 casework procedure and database?

3 **A.** Not specifically, no.

4 **Q.** Do you recall there being a database?

5 **A.** No.

6 **Q.** In relation to the prosecution policy, page 2  
7 again, please, at 3.1.6, the heading is  
8 "Prosecuting Criminals":

9 "This policy supports the Code of Business  
10 Standards in normally prosecuting those who  
11 commit theft or fraud and where appropriate  
12 offences under the Postal Services Act 2000  
13 Sections 83 and 84."

14 Stopping there, the heading here, and what  
15 follows, rather assumes that it has already been  
16 established that the person suspected of  
17 committing a crime is guilty of it, doesn't it?

18 **A.** It does.

19 **Q.** They are a criminal, those that commit theft or  
20 fraud?

21 **A.** It's clumsy. It does.

22 **Q.** Was this the way that those being prosecuted by  
23 the Post Office were spoken about by those  
24 within the Security Team?

25 **A.** On occasion, yes.

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1 As far as you can recall, does the position  
2 set out here in the policy accurately reflect  
3 who was, in fact, making decisions on  
4 prosecutions in 2007?

5 **A.** In terms of nominated representatives, yes, it  
6 would have done.

7 **Q.** This document is the first prosecution policy  
8 document the Inquiry has seen which sets out  
9 with any specificity who will take the  
10 prosecution decision. Could we have on screen,  
11 please, paragraph 55 of Mr Pardoe's statement.  
12 That is page 22 of WITN08170100.

13 Under the heading here "Decisions about  
14 prosecution and criminal enforcement  
15 proceedings", you say this at 55:

16 "There was a period when I dealt with  
17 prosecution decisions, both as a conduit between  
18 the Post Office Investigation Department and  
19 line managers making the decision and then as  
20 a period myself as the nominated representative.  
21 I'm unsure why the switch was made between line  
22 manager and Security as a nominated  
23 representative, but it occurred."

24 When you refer to line managers taking  
25 prosecution decisions, who were you referring

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1 to?  
 2 **A.** So there would have been a time, and it would  
 3 really be going back to the earliest days of my  
 4 career within the Security function, where at  
 5 a local district level, line managers within the  
 6 district would make a recommendation on the back  
 7 of an investigation conducted by the Post Office  
 8 Investigation Department and an advice offered  
 9 by the Criminal Law Team about whether  
 10 prosecution would be signed off. It was dealt  
 11 with on such a local level. I certainly  
 12 remember that.

13 That was outside of the security line. That  
 14 was dealt with dependent on seniority, maybe not  
 15 line manager. It may be more accurate with  
 16 hindsight to read line manager's line manager  
 17 but I certainly recall, in my earliest days,  
 18 decisions being made by an out of the Security  
 19 function line manager.

20 **Q.** Can you recall when the switch was made?

21 **A.** So we moved from districts, we moved to regions.  
 22 I suspect that, even then, a regional  
 23 representative was signing off the prosecution  
 24 element. So we'd probably be coming into the  
 25 start of the 2000, probably maybe even coming

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1 made in the face of supporting advice from the  
 2 Criminal Law Team. CLT would have seen all the  
 3 facts appertaining to the case, including audit  
 4 reports, Investigator report, supporting  
 5 evidence and interview précis. My expectation  
 6 was that the CLT, as an integral part of Post  
 7 Office Security, would have made all the due  
 8 considerations in line with Code for Crown  
 9 Prosecutors and applied each necessary test in  
 10 reaching their decision. I took a stance that  
 11 the decision will have been checked by CLT for  
 12 fairness and objectivity. I saw my role to  
 13 confirm their decision and place the case into  
 14 prosecution status via the Investigation Team  
 15 leader."

16 Moving over the page, please, to  
 17 paragraph 59. You say:

18 "In terms of test around the correctness of  
 19 prosecution and charging decisions, then  
 20 I firmly expected this to have been considered  
 21 at the CLT stage. If they had felt that public  
 22 interest factors tended against prosecution then  
 23 my expectation was that this would have been  
 24 clearly stated. I am genuinely not attempting  
 25 to be evasive but I fail to see what additional

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1 into the date of that policy document.

2 **Q.** Do you recall the reason for the change?

3 **A.** I was never apprised as to the reason, no.  
 4 Never.

5 **Q.** At paragraph 57, going over the page, please,  
 6 you deal here with a document which the Inquiry  
 7 understands to date to around 2012. Unless you  
 8 wish to go to it, we needn't have that up on  
 9 screen but the document reference for the  
 10 transcript is POL00104929.

11 This document suggests that it was the Head  
 12 of Security who would make the prosecution  
 13 decision. Is it right that you don't recall  
 14 this being the case while you were in a Security  
 15 Operations role?

16 **A.** Correct and, indeed, from the evidence that I've  
 17 seen through the Inquiry, that was not the case.  
 18 It was -- I think I say there, it was at the  
 19 latter end of my career.

20 **Q.** As to the process you would follow when you were  
 21 in the prosecution decision-making role, you  
 22 deal with this in general terms at paragraph 56,  
 23 going back a page, please.

24 You say this:

25 "A decision to prosecute would only ever be

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1 input I was providing around correctness when  
 2 a principal or senior lawyer had carefully made  
 3 the charging decision."

4 Then at 60:

5 "The question around charges was solely  
 6 within CLT; whilst towards the ending of my  
 7 tenure I'm aware that investigators would  
 8 recommend charges when submitting papers into  
 9 the CLT, the ultimate recommendations sat with  
 10 CLT. Again, in terms of prosecution decision  
 11 then my expectation was that all elements had  
 12 been considered by CLT in reaching a decision."

13 Do you recall ever declining to provide your  
 14 authority when the Criminal Law Team's advice  
 15 was that the prosecution test was met?

16 **A.** Not by authority, although I do reference in the  
 17 statement I recall with some clarity when a case  
 18 came into the district, early days of my career,  
 19 with a prosecution consensus from the Criminal  
 20 Law Team, and that was returned as being not  
 21 agreed with, yes.

22 **Q.** What was the reason for not agreeing?

23 **A.** Ironically, it was a case I had some detailed  
 24 knowledge of. I know that I'd supported POID in  
 25 the case. It was an individual who took over

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1 the running of a post office in, I guess, one of  
2 the less salubrious areas of the northwest of  
3 England. For whatever reason, the local  
4 community had taken almost an immediate dislike  
5 to him.

6 He'd been subject to quite serious physical  
7 assault on a number of occasions when going  
8 about his day-to-day life in the community. His  
9 backyard to the Post Office had actually,  
10 effectively, been booby trapped, in so much, as  
11 if he'd have opened the rear gate into his  
12 backyard, two large concrete blocks would have  
13 dropped onto whoever opened the gate. That was  
14 spotted, fortunately, by his partner as she was  
15 taking a child of probably no more than one or  
16 two years of age in a pram out into the  
17 backyard. You could only imagine if that hadn't  
18 been spotted what the ramifications could have  
19 been.

20 It's fair to say that individual probably  
21 lost their head, which is understandable. They  
22 moved their infant child and wife away from the  
23 premises, incurred additional rental demands on  
24 their income as a result of that, went into  
25 complete state of disarray, and I apprised

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1 as a prosecution decision maker, you had  
2 a different and distinct role to that of the  
3 Investigators in your strand of the Security  
4 Team?

5 **A.** Yes, I was conscious of that. I would still --  
6 I have no truck with taking responsibility for  
7 decisions that I was making during that period.  
8 I still thought that I was, in effect, rubber  
9 stamping and placing back into an operational  
10 casework environment a decision that had been  
11 made by a highly qualified, on occasion,  
12 principal lawyer within the Criminal Law Team  
13 and, sat here now, that may sound a weak  
14 approach but I think, if you compare and  
15 contrast five/six years of legal training, plus  
16 principal law status within the Group and then  
17 Post Office Criminal Law Team, and you compare  
18 that to my own experience, I think it's probably  
19 understandable why I'd take that viewpoint.

20 **Q.** Looking back now, do you think it was  
21 appropriate for a non-legally-qualified Post  
22 Office employee to be the sign-off for  
23 a decision as significant to the lives of  
24 individuals, and to the business, as  
25 a prosecution?

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1 the -- it was, at the time, the Head of Services  
2 for the district of the facts to that, even to  
3 they'd been detailed comprehensively within the  
4 Post Office Investigation Department report and,  
5 between us, it was decided that it served no  
6 useful interest to place that subpostmaster into  
7 prosecution for the false accounts that had been  
8 completed to cover the fact that monies had been  
9 stolen to support his wife and child as they  
10 lived away from the premises.

11 **Q.** Would you have seen the advice of the Criminal  
12 Law Team where the advice was that the  
13 prosecution test was not met?

14 **A.** Yes.

15 **Q.** Was there ever a case where you pushed back  
16 against the advice that the test for prosecution  
17 was not met?

18 **A.** I don't recall when not met no. I think it's  
19 probably fair to say that the vast majority of  
20 cases that went forward, where there was felt to  
21 be a *prima facie* case to answer, probably came  
22 back with a prosecution decision from the  
23 Criminal Law Team.

24 **Q.** Looking back now, do you think you were  
25 conscious -- truly, actively conscious -- that,

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1 **A.** So if I just -- almost replaying that through my  
2 mind. So a Criminal Law Team lawyer would make  
3 the overview in the first instance. Should that  
4 then have sat with somebody else who was  
5 suitably legally qualified to effectively rubber  
6 stamp that decision? I think probably the  
7 element that's missing, with respect, there is  
8 that element of true independence. I couldn't  
9 sit here and argue or debate that I was  
10 an independent oversight in that whole process;  
11 of course I wasn't. I was heavily employed --  
12 heavily invested in the function.

13 So I think what was missing there, again,  
14 with respect, would be an element of true  
15 independence to that process.

16 **Q.** How did you satisfy yourself that there was  
17 a genuine loss to the business in cases where  
18 you were being asked to approve the prosecution,  
19 or did that not enter your mind as something  
20 that was a question for you?

21 **A.** So the case papers would obviously come across  
22 my desk at some stage. I think there was  
23 a period when casework may have been performed  
24 electronically but, nevertheless, I would see  
25 the Investigator's report, and that would be

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1 a structured report, and part of the demands of  
2 that report is that it would outline the most  
3 current loss, known loss to the business.

4 I'd read through that report. So I'd be  
5 fully aware that we were stating there was  
6 a loss to the business at that stage, and that's  
7 even before it found its way to the Criminal Law  
8 Team. So when the advice came back from the  
9 Criminal Law Team with whatever charges were  
10 felt to be appropriate, I'd have been aware that  
11 certainly the Post Office was stating that there  
12 was a particular loss attached to that case.

13 **Q.** Did you ever give consideration to whether  
14 a shortfall might have been caused by a user  
15 error stemming from inadequate training on the  
16 Horizon system?

17 **A.** No, and I think what there was, there was almost  
18 a mentality, not just from myself but probably  
19 from an Investigator perspective as well, that  
20 the admission to false accounting, that was  
21 almost stated and that's what should have been  
22 reported. So I think there was probably less  
23 focus given to the root cause than there was to  
24 actually submitting a set of case papers that  
25 outlined the fact that there was that admission

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1 at some stage, I'd have been aware of those.

2 **Q.** This document in both versions sets out the need  
3 for two separate reports: one the conduct  
4 report, to go to the discipline manager, and  
5 another the legal report, to go to the Criminal  
6 Law Team. Sensitive information should only be  
7 included in the legal report, not the conduct  
8 report, and there are also paragraphs dealing  
9 with both operational and procedural failures  
10 identified during an investigation. Is that  
11 a fair summary of the nature of the document?

12 **A.** Absolutely, yes.

13 **Q.** If we could have paragraph 68, please, on  
14 screen, this is page 26. You've addressed your  
15 understanding of the document at some length in  
16 this paragraph. Without going through line by  
17 line and taking it fairly shortly, is it right  
18 that you never read this document as being  
19 applicable to bugs, errors or defects in the  
20 Horizon system?

21 **A.** Absolutely.

22 **Q.** You provide an example of what the instructions  
23 contained within the document might apply to.  
24 In short, is it an example of weakness in  
25 a product which, if known about by unscrupulous

79

1 to false accounting, and the standard way would  
2 be you'd detail the date when the first account  
3 was prepared falsely, one in the middle, and  
4 then the last account was prepared falsely.

5 So I think that was probably something that  
6 was occurring at the time, yes.

7 **Q.** So were you simply taking it as a given that  
8 there was a loss?

9 **A.** Yes.

10 **Q.** You say at paragraph 40 of your statement that  
11 you recall there being a template around the  
12 construction of case files to standardise  
13 casework; is that right?

14 **A.** Correct, yes.

15 **Q.** You then deal at paragraph 67 to 76 with  
16 a number of casework compliance documents. One  
17 document which the Inquiry sent you for the  
18 purposes of preparing your statement was  
19 a document entitled "Casework Management", and  
20 there are two versions of that: one dated March  
21 2001 dated October 2002. Is it right that you  
22 do not specifically recall receiving either  
23 version of this document before they were  
24 provided to you by the Inquiry?

25 **A.** Yes, but again, logic would dictate that they --

78

1 people, might be exploited to commit fraud?

2 **A.** Correct.

3 **Q.** You say at paragraph 71 of your statement -- and  
4 that's page 27 over the page -- that it was also  
5 your understanding that:

6 "... every single document and Investigator  
7 comment on organisational weaknesses should have  
8 been subject to review by the [Criminal Law  
9 Team] and the disclosure test applied  
10 accordingly."

11 You say that you recall the Criminal Law  
12 Team specifically advising you that this would  
13 be the case; is that right?

14 **A.** It is.

15 **Q.** Who was it who advised you of this? Can you  
16 recall?

17 **A.** Yeah, Rob Wilson.

18 **Q.** The Inquiry has provided you with a number of  
19 emails from 2011 and 2012, from David Posnett,  
20 relating to casework compliance. Is it right  
21 that you recall something of the introduction of  
22 compliance checks in 2011?

23 **A.** It is. I recall the concept yes, I do.

24 **Q.** Can we have the first of the emails from David  
25 Posnett on screen, please. This is document

80

1 reference POL00118096. Looking, please, at the  
2 email starting about halfway down the page from  
3 David Posnett to a number of Security Team  
4 recipients, including you, it's dated 23 May  
5 2011, and the subject is "Casework Compliance".

6 The email reads as follows:

7 "All

8 "Most of you are aware that case files  
9 submitting for legal advice will become subject  
10 to compliance checks. This process is due to  
11 commence in June and is designed to raise  
12 standards of files submitted (including their  
13 contents -- reports, taped summaries, appendix  
14 enclosures, recoveries, stakeholders, etc) and  
15 ensure there is a consistent approach across the  
16 team. It is also probably an opportune time  
17 given that we have recently recruited new people  
18 to the team.

19 "I've associated relevant documents that  
20 feed into the compliance process. Please  
21 familiarise yourself with these documents."

22 A number of compliance documents were  
23 attached to Mr Posnett's email in a zip file.

24 Presumably, given the instruction in

25 Mr Posnett's email to "familiarise yourself with

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1 It's completely unacceptable.

2 **Q.** You say at paragraph 76 of your statement -- and  
3 could we have that on screen, please, that is  
4 page 29 of Mr Pardoe's statement -- you say  
5 here:

6 "We did instruct Investigators to record  
7 identification codes. My recollection was that  
8 these were required to complete any submission  
9 into Police to have details of subsequent  
10 convictions ended onto the PNC. These were  
11 referred to as NIB type details. I certainly  
12 don't recall the horrendous language on the form  
13 or the obsolete country names."

14 Do you recall there being a specific form  
15 used by the Post Office as a non-police agency  
16 to notify the police of criminal proceedings?

17 **A.** I think I probably recall a number of variations  
18 of that form. I would have referred -- I think  
19 "NIB type details" would have been appertaining  
20 to when I was an Operational Investigator.

21 I think that they changed then to NPA details.  
22 **Q.** Could we have on screen please document  
23 reference POL00118374. This is a blank copy of  
24 the form NPA01; do you recognise that now?

25 **A.** I do indeed.

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1 the documents attached", would you have read  
2 them all when you received this email?

3 **A.** I think it would probably be fair to say, at  
4 best, they would have been scan read.

5 I wouldn't have expected them to go into them in  
6 the same level of detail and I recognise  
7 obviously all the names there in the "to" box.

8 I wouldn't expect to go into the same level of  
9 detail as, say, an existing team leader but,  
10 yes, I'd have given it the due attention of  
11 opening those and just scanning them.

12 **Q.** One of the documents which Mr Posnett asked  
13 recipients of his email to familiarise  
14 themselves with was the Identification Codes  
15 document, and this is a document which you  
16 comment on at paragraph 75 of your statement.

17 The Inquiry is familiar with this document  
18 and I do not intend to display it on screen.

19 But do you know the document I'm referring to?

20 **A.** It's absolutely abhorrent. I do indeed, yes.

21 **Q.** Does it remain your position that you do not  
22 recall reviewing the document at the time?

23 **A.** I think it remains my position. Had I been  
24 consciously aware of that document at the time,  
25 I'd have vehemently challenged that document.

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1 **Q.** We can see the agency name, Post Office Limited,  
2 at the top left. Then there are boxes for  
3 various identifying details of the person being  
4 charged or summonsed. The prosecuting agents  
5 are identified about halfway down the page as  
6 the Post Office Legal Services Criminal Law  
7 Team.

8 Then over the page, please. There are  
9 a number of options there for ethnic appearance  
10 and there are seven boxes for those options.

11 Is this the form that you understood  
12 investigators to use to notify the police of  
13 proceedings?

14 **A.** At that time, yes. It certainly -- from memory,  
15 it would have been different in the form I would  
16 have been completing as an Operational  
17 Investigator but, certainly at the time that  
18 I was in the strand, that's the form I recognise  
19 Investigators would complete.

20 **Q.** Was this the form on which they would identify  
21 the identification code which applied in any  
22 given case for the police?

23 **A.** I'm failing to see the actual field where that's  
24 actually inserted.

25 **Q.** Well, the ethnic appearance boxes, there are

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1 seven options there: "White European"; "Dark  
2 European"; "Afro-Caribbean"; "Asian",  
3 "Oriental"; "Arab"; and "Unknown"?

4 **A.** Correct.

5 **Q.** Do they accord with the options, as you  
6 understood them, for submission to the police,  
7 or not?

8 **A.** Correct. They do.

9 **Q.** So is it right then that no reference to the  
10 Identification Codes document circulated by  
11 Mr Posnett in 2011 was necessary to provide  
12 identity code information to the police?

13 **A.** Absolutely correct, yes.

14 **Q.** Turning back, then, to Mr Posnett's zip file of  
15 compliance documents. Could we have document  
16 reference POL00118101. This is one of the  
17 attachments, this is the "Guide to the  
18 Preparation and Layout of Red Label Case Files,  
19 Offender reports & Discipline reports". I think  
20 you had the opportunity of reading this for the  
21 purposes of preparing your statement?

22 **A.** I did.

23 **Q.** Starting on page 4 of that document, please, we  
24 see a preamble for the policy template of  
25 an offender report, scrolling down a little,

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1 terms.

2 **Q.** Given that it was not necessary to use this  
3 document, the Identification Codes document  
4 circulated by Mr Posnett for police notification  
5 purposes, because the options were there on the  
6 face of the form, can you help us with why it  
7 was being used to populate the offender report?

8 **A.** Absolutely no idea, sorry. No.

9 **Q.** Turning, please, to the involvement of Post  
10 Office Investigators following the  
11 identification of an apparent shortfall at  
12 audit. In relation to cases where an apparent  
13 shortfall was discovered at audit, you recall  
14 there being a triggers and timescale document  
15 that covered the monetary loss value at which  
16 Investigators would get involved; is that right?

17 **A.** It is.

18 **Q.** Is it right that you recall, at least at some  
19 stage, a £1,000 loss being the minimum level or  
20 the involvement of investigators?

21 **A.** Yes.

22 **Q.** Do you recall what the rationale was for there  
23 being a minimum level of apparent loss for the  
24 commencement of a criminal investigation?

25 **A.** Sheer volume of work.

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1 please. Going over to the top of the next page  
2 please, at the top right we see "Identification  
3 Code: (Numbers 1 to 7 only)", and the  
4 Identification Codes document which Mr Posnett  
5 had circulated had seven options, didn't it, in  
6 terms of identification codes?

7 **A.** It did.

8 **Q.** So Investigators were being instructed to enter  
9 an identification code limited to options 1 to  
10 7?

11 **A.** Correct.

12 **Q.** They were being provided with the Identification  
13 Codes document sent in the same compliance zip  
14 file, which you describe as utterly abhorrent?

15 **A.** Correct.

16 **Q.** Was there any other way for Investigators  
17 receiving Mr Posnett's suite of compliance  
18 documents to interpret the instruction, other  
19 than "Use this Identification Codes document to  
20 complete the identification codes space on the  
21 offender report"?

22 **A.** I think the only exception to that would be the  
23 more long-serving Investigators who may hold  
24 an alternative version of the identity codes  
25 document, without reference to such offensive

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1 **Q.** What were the other triggers for a criminal  
2 investigation in addition to the level of  
3 an apparent shortfall?

4 **A.** I think it would have been a victim impact. So  
5 I would expect that an investigation would have  
6 been triggered if, say, the alleged fraud was  
7 directly impacting a customer of Post Office.  
8 I can't really think of any others outside of  
9 that.

10 **Q.** You say at paragraph 6 of your statement that:  
11 "In the face of reductions in investigator  
12 numbers, lower level cases would not have been  
13 progressed."

14 We've heard evidence from Tony Utting that  
15 there came a time when restructuring of the  
16 Security Team and a reduction in headcount led  
17 to a rising of the triggers for a criminal  
18 investigation; do you recall that?

19 **A.** I don't recall the explicit instruction but  
20 I wouldn't challenge that. I certainly, as  
21 an Operational Investigator, dealt with lines of  
22 operational investigation that simply would not  
23 have been taken on, for want of a better  
24 expression, after, say, 2000/2005.

25 **Q.** Where the level of an apparent shortfall

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1 identified on audit wasn't sufficient to trigger  
 2 a criminal investigation, what steps were taken  
 3 by the Post Office in relation to the apparent  
 4 shortfall?  
 5 **A.** So my understanding and expectation is that  
 6 would have been dealt with by the local line  
 7 management in various monikers, whether that's  
 8 the area sales manager or early support manager.  
 9 I think that title changed over the years,  
 10 although the functionality remained broadly  
 11 similar. It would have been dealt with at  
 12 a local level but still with a focus on  
 13 repayment back to the business.  
 14 **Q.** So were attempts made to recover the apparent  
 15 shortfall under a subpostmaster's contract?  
 16 **A.** The contract, that clause in the contract, "The  
 17 subpostmaster is responsible for all losses no  
 18 matter how they occur", would have been pursued  
 19 relentlessly.  
 20 **Q.** Absent the criminal investigation machinery, did  
 21 the Post Office consider itself under any  
 22 obligation to get to the bottom of the cause of  
 23 an apparent shortfall or was it sufficient for  
 24 debt recovery purposes that there was one?  
 25 **A.** In terms of a case that the investigation

1 person responsible.  
 2 You then set out at paragraphs 49 to 54 some  
 3 more detail in terms of the process, which you  
 4 say Investigators would follow following  
 5 identification of a shortfall at audit.  
 6 Were you ever an Investigator in a case  
 7 where a reportable discrepancy was discovered on  
 8 audit of a branch after the introduction of the  
 9 Horizon system?  
 10 **A.** As an Operational Investigator?  
 11 **Q.** Yes.  
 12 **A.** No, never.  
 13 **Q.** Is the detail at paragraphs 49 to 54 based on  
 14 your practice when you were an Investigator?  
 15 **A.** Broadly, yes. I think probably the only add-ons  
 16 for that would be source documentation  
 17 post-Horizon that the Investigator would obtain  
 18 from the Auditor at branch. But the mechanics  
 19 of, you know, the use of a pocket book, the  
 20 mechanics of invite to tape recorded interview  
 21 with all that entailed under PACE, would be the  
 22 same, yes.  
 23 **Q.** When you were leading the Fraud Strand and  
 24 Security Operations function, what documents  
 25 would you have expected Investigators operating

1 function was taking forward or where it sat  
 2 with --  
 3 **Q.** Where it wasn't being taken forward.  
 4 **A.** Where it wasn't being taken forward. I think  
 5 that would probably depend on the tenacity of  
 6 the Area Manager. I don't think that there was  
 7 any formal policy document or expectation that  
 8 that would be the case.  
 9 **Q.** You refer at paragraph 49 of your statement to  
 10 the steps which were taken once a reportable  
 11 audit discrepancy had been identified. By  
 12 reportable audit discrepancy, do you mean one  
 13 which triggered the involvement of  
 14 Investigators?  
 15 **A.** I do.  
 16 **Q.** Who decided whether an audit discrepancy was  
 17 reportable?  
 18 **A.** So I think if it was in excess of the prevailing  
 19 triggers document at that time, then the  
 20 mechanics would be that the audit function would  
 21 report that into an investigation contact point.  
 22 **Q.** You discuss the purpose of an Investigator  
 23 attending a branch at paragraph 45 of your  
 24 statement and you say it was to secure and  
 25 examine evidence and take an account from the

1 under your leadership to secure when they  
 2 attended a branch in an apparent shortfall case?  
 3 **A.** The relevant documentation that would evidence  
 4 the shortfall at branch obtained from the  
 5 auditor to enable production at the first  
 6 account type of interview under caution.  
 7 **Q.** Are you referring there to the Horizon reports  
 8 which could be printed from the counter in the  
 9 branch?  
 10 **A.** Yes, plus any supplementary evidence that the  
 11 Auditor had brought to the branch, because  
 12 a risk audit may have been triggered by other  
 13 elements such as a reluctance to return,  
 14 ostensibly, excess cash held by the branch. So,  
 15 obviously, if those type of details were held by  
 16 the Auditor, my expectation is that they would  
 17 have been taken into the interview as well and  
 18 an account asked for that form of scenario.  
 19 **Q.** You say at paragraph 45 of your statement that  
 20 an Investigator would have engaged with the  
 21 Retail Line in terms of the future of the  
 22 office, immediately post-audit. Would the views  
 23 of a Retail Line Manager ever had had any  
 24 bearing on whether a criminal investigation was  
 25 commenced in the first place?

1 **A.** No, never.  
 2 **Q.** In terms of investigatory steps taken after  
 3 interview of a suspect, where the only evidence  
 4 of a loss was the Horizon record available in  
 5 branch, or later on Credence, when compared with  
 6 the Auditor's findings, what further enquiries  
 7 would you have expected an Investigator to make  
 8 as part of their investigation before sending  
 9 their report to casework?  
 10 **A.** And, again, I think that would have been based  
 11 on the account that had been given at the  
 12 interview under caution. If there'd been quite  
 13 a full and frank account, it's fair to say there  
 14 would be less back research to support the  
 15 submission to the Criminal Law Team. If the  
 16 account had been vague, particularly in terms of  
 17 when shortfall existed and first commenced, and  
 18 so on and so on, I'd have expected them to be  
 19 more tenacious in obtaining ARQ logs and the  
 20 like.  
 21 **Q.** When you were an Investigator in an apparent  
 22 shortfall case, did you understand it to be any  
 23 part of your role to make enquiries into the  
 24 liability of the core evidence which was being  
 25 relied upon to prove the loss to the business?

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1 where the money had gone, try and follow the  
 2 money, so to speak, by making financial  
 3 enquiries relating to the suspect?  
 4 **A.** On occasion, yes.  
 5 **Q.** When you led the Fraud Strand or Security  
 6 Operations function, did you expect your  
 7 Investigators to make financial enquiries to try  
 8 to establish where the money that gone?  
 9 **A.** If they felt that appropriate, yes.  
 10 **Q.** Was there a checklist of steps to take or any  
 11 other guidance to ensure all relevant  
 12 information was identified, collected and sent  
 13 to the Criminal Law Team in proceedings brought  
 14 by the Post Office against subpostmasters and  
 15 relevant staff?  
 16 **A.** I seem to recall there was something that the  
 17 investigator would be able to rely on, certainly  
 18 in that case file construction, and the contents  
 19 of the various appendices within that case file  
 20 construction.  
 21 **Q.** When did you first become aware of a case where  
 22 a Post Office employee, a subpostmaster, or  
 23 a member of a subpostmaster's staff, attributed  
 24 an apparent shortfall to problems with the  
 25 Horizon system?

95

1 **A.** When I was an Investigator?  
 2 **Q.** When you were an Investigator?  
 3 **A.** So when I was an Investigator, I'd have been  
 4 faced with a number of scenarios. Number 1  
 5 would have been the production of daily and  
 6 weekly handwritten ledgers, which were the daily  
 7 and weekly books. The other scenario is that,  
 8 at that stage, there was the advent of those  
 9 books being transcribed electronically, so there  
 10 were a number of IT systems that did the job of  
 11 those two handwritten ledgers. I was aware  
 12 that I was to examine those ledgers, and confirm  
 13 the veracity of the audit findings, yes.  
 14 **Q.** When you led the Fraud Strand or the Security  
 15 Operations function, did you expect your  
 16 Investigators to make enquiries as to the  
 17 reliability of the core evidence which was being  
 18 relied upon to prove loss to the business in  
 19 an apparent shortfall case?  
 20 **A.** In terms of reliability, then I -- my belief is  
 21 that the Investigator would have accepted the  
 22 audit findings.  
 23 **Q.** When you were an Investigator in an apparent  
 24 shortfall case, where the suspicion was that  
 25 someone had stolen money, would you investigate

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1 **A.** I think it would have been the early part of the  
 2 2000s. I can't give any greater clarity than  
 3 that, unfortunately.  
 4 **Q.** You address your understanding of the purpose of  
 5 and process for acquiring ARQ data starting at  
 6 paragraph 77 of your statement. Could we have  
 7 that on screen, please. It is page 29 of  
 8 Mr Pardoe's statement. You say at 77:  
 9 "I personally was not an operational  
 10 Investigator from the inception of Horizon.  
 11 I don't recall supporting or certainly leading  
 12 a Horizon type investigation. I did obviously  
 13 lead the Fraud Strand and Security Operations  
 14 function during the pertinent periods, so will  
 15 respond with that in mind."  
 16 You go on at paragraph 78 to say this:  
 17 "I appreciate that this is a view that will  
 18 have been expressed previously but, throughout  
 19 my tenure, the opinion firmly expressed at every  
 20 turn, internally, was that Horizon was fit for  
 21 purpose. I recall with an element of clarity  
 22 updates from John Scott assuring the Security  
 23 function that the system was reliable, and we  
 24 were to continue with BAU activity.  
 25 I appreciate that there became a more measured

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1 approach towards the end of my tenure, but  
 2 I certainly don't recall being involved in those  
 3 conversations. I also seem to recall  
 4 an internal Paula Vennells communication in  
 5 response to the increasing noise around Horizon;  
 6 obviously I can't recall word for word, but the  
 7 thrust was that Post Office were defending the  
 8 system and refuted the claims. My point is that  
 9 with honesty the use of tools such as Credence  
 10 data and ARQ logs were to my mind used as much  
 11 to evidence guilt than innocence and  
 12 particularly utilised when false accounting was  
 13 admitted but not theft. My understanding is the  
 14 Investigator would analyse logs to attempt to  
 15 evidence theft and wrongdoing particularly in  
 16 terms of cash balance declarations and  
 17 redeclarations; I'm not even sure how the log  
 18 would denote a bug, error or defect. It's  
 19 certainly not an area we had any training in,  
 20 ie to spot a bug, error or defect these are the  
 21 data patterns you should search for."

22 You then say:

23 "The language at POL00055590 in terms of  
 24 Horizon bashing expressed by a senior lawyer was  
 25 not uncommon."

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1 Is it the language used in the last line of  
 2 this email that you say in your statement was  
 3 not uncommon?  
 4 **A.** Absolutely.  
 5 **Q.** Not uncommon for this particular lawyer or not  
 6 uncommon in general?  
 7 **A.** I believe that was a theme.  
 8 **Q.** At what level within the business was this  
 9 language being used?  
 10 **A.** That type of sentiment, at every level.  
 11 **Q.** Could we have page 30 of Mr Pardoe's statement  
 12 up on screen, please. Paragraph 79 of your  
 13 statement reads as follows:

14 "My understanding is that Fujitsu was  
 15 contracted to provide Audit Record Query data,  
 16 on demand, using an agreed secure process.  
 17 I seem to recall that the data provided a full  
 18 log at keystroke levels for the period specified  
 19 by the Investigator and providing transactional  
 20 and branch reporting detail. I'm aware that  
 21 this data could be used to identify singleton  
 22 transactions (like the use of a certain credit  
 23 card) or a full and complete series of  
 24 transactions using a date range specified by the  
 25 requester."

99

1 Pausing there, could we have the document  
 2 referred to here on screen, please. The  
 3 reference is POL00055590. This is an email from  
 4 Jarnail Singh to a number of individuals on the  
 5 21 October 2010, following the conclusion of the  
 6 Seema Misra trial. You are not, in fact, by the  
 7 looks of things, on the email circulation list  
 8 here. The email reads as follows:

9 "Dear All,

10 "After a lengthy trial at Guildford Crown  
 11 Court the above named was found Guilty of theft.  
 12 This case turned from a relatively  
 13 straightforward general deficiency case to  
 14 an unprecedented attack on the Horizon system.  
 15 We were beset with unparallel degree of  
 16 disclosure requests by the defence. Through  
 17 hard work of everyone, counsel Warwick Tatford,  
 18 Investigation Officer Jon Longman and through  
 19 the considerable expertise of Gareth Jenkins of  
 20 Fujitsu we were able to destroy to the criminal  
 21 standard of proof (beyond all reasonable doubt)  
 22 every single suggestion made by the Defence.  
 23 "It is to be hoped the case will set  
 24 a marker to dissuade other defendants from  
 25 jumping on the Horizon bashing bandwagon."

98

1 Going then, please, to paragraph 91 of the  
 2 statement, this is page 33, here you say this:

3 "In line with my response at 78, my belief  
 4 is that there was a cynicism in terms of the  
 5 steps that were taken to support any assertion  
 6 that Horizon was the root cause of  
 7 discrepancies. Horizon data from my perspective  
 8 was primarily a tool to either evidence how  
 9 false accounting took place or to support  
 10 a charge of theft and particularly when theft  
 11 was denied at interview. I'm struggling to  
 12 understand how the ARQs would identify a bug,  
 13 error or defect and particularly if their  
 14 presence was subtle and sat beneath obvious  
 15 keystroke data."

16 At 92:

17 "I'm not aware of circumstances where an ARQ  
 18 was provided to an SPMR, save for prosecution  
 19 cases when I would have expected the data to be  
 20 disclosed."

21 Should the Chair understand from the  
 22 paragraphs of your statement that we've just  
 23 looked at that ARQ data was primarily obtained  
 24 in order to support a prosecution once the  
 25 decision had been made to prosecute?

100

1 A. I think there may have been a variety of  
2 approaches to that.

3 Q. So the purpose of obtaining ARQ data was not, at  
4 least in your mind, for an Investigator to test  
5 the reliability of the core evidence being  
6 relied upon to prove an offence?

7 A. That's correct.

8 Q. Or to pursue a line of inquiry which might lead  
9 away from the guilt of a suspect?

10 A. That's correct.

11 Q. Do you recall ARQ data ever being obtained  
12 before a decision had been made to prosecute?  
13 You just referred to a variety of approaches?

14 A. I think, on occasion, it would be, yes.

15 Q. You recall there being limits in respect of ARQ  
16 requests and you address that at paragraph 80 of  
17 your statement. Could we have that on screen,  
18 please, it's page 30. You say here that  
19 a document has refreshed your memory and you can  
20 recall that:  
21 "... as a function we were capped, within  
22 contract, at 720 requests [per annum]."  
23 Was that per annum, "PA"?

24 A. It is, yes.

25 Q. "I seem to recall that this changed during  
101

1 A. I do indeed, and I think, probably earlier to  
2 this, there was a greater demand on the limits  
3 because the demise of the benefit book as  
4 a method of payment, a decision was made by the,  
5 at the time, DWP to cease reconciliation of  
6 subpostmaster submissions, and so the business  
7 took a risk-based view that they would sit that  
8 reconciliation within house, so that in itself,  
9 because of the findings of the reconciliation  
10 function, if I recall, also led to a greater  
11 demand on ARQ requests.

12 MS PRICE: Sir, I have reached the end of one topic  
13 and the next topic is a little larger. Would  
14 now be a convenient time to that have an early  
15 lunch?  
16 Sir, I think you're on mute.

17 SIR WYN WILLIAMS: How are we doing, generally, in  
18 terms of closing at 2.00 because that is, I'm  
19 afraid, an unmovable cut-off point.

20 MS PRICE: Sir, we're making good progress. If we  
21 take 30 minutes for lunch, we should be fine to  
22 finish at 2.00, including, I hope, Core  
23 Participant questions.

24 SIR WYN WILLIAMS: Well, it will have to include  
25 them, so to speak. So between you and them,  
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1 mediation, but I wasn't involved in discussions  
2 around this and am not aware what the uplift  
3 was. I seem to recall that additional requests  
4 were around £500. I don't specifically remember  
5 being involved in uplift conversations that  
6 authorised these; it certainly wasn't a budget  
7 that I held, and I presume that John Scott would  
8 have addressed this with the wider business."  
9 Then at paragraph 81:  
10 "I don't recall specifically any specific  
11 changes between Legacy Horizon and Horizon  
12 Online I do not recall Investigator noise that  
13 this was proving to be problematic."  
14 By "Investigator noise", do you mean you  
15 were not aware of Investigators complaining  
16 about the limits on ARQ requests?

17 A. I think an element of that and also any  
18 difficulties in investigation, because the  
19 business had changed from Legacy Horizon with  
20 local storage and transmission to rather towards  
21 Horizon Online. I don't recall any noise for  
22 either of those instances.

23 Q. Do you recognise, however, that the existence of  
24 limits was likely to impact upon the number of  
25 cases in which ARQ requests were made?  
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1 you'll have to arrange the rest of the programme  
2 to permit that to happen, if I can put that in  
3 that way, all right?

4 MS PRICE: Yes, sir, understood.

5 SIR WYN WILLIAMS: Fine. Okay. So what do we make  
6 the time now? 11.54, I make the time. So  
7 12.25?

8 MS PRICE: Yes, please, sir.

9 SIR WYN WILLIAMS: Fine.

10 (11.54 am)

11 (A short break)

12 (12.26 pm)

13 MS PRICE: Hello, sir, can you see and hear us.

14 SIR WYN WILLIAMS: Yes, thank you.

15 MS PRICE: Mr Pardoe, do you recall the first  
16 iteration of Horizon being rolled out to  
17 branches?

18 A. Broadly, yes.

19 Q. At the time, did you have any awareness of there  
20 being bugs, errors or defects or Acceptance  
21 Incidents during the rollout?

22 A. I did not, no.

23 Q. Did you become aware of such issues occurring  
24 during that rollout at any point later in your  
25 career?  
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1 A. Yes.  
 2 Q. Can you remember when?  
 3 A. Unfortunately, not, no.  
 4 Q. There is a sentence which you use in a number of  
 5 places in your statement about your awareness of  
 6 bugs, errors or defects in the Horizon system.  
 7 Could we have on screen, please,  
 8 paragraph 111 of Mr Pardoe's statement, it's  
 9 page 37. This is the first time that you use  
 10 the sentence and you do so in the context of  
 11 commenting on the Josephine Hamilton case?  
 12 A. Could it be enlarged please?  
 13 Q. Yes, of course.  
 14 A. Thank you.  
 15 Q. Is that large enough or shall we zoom in?  
 16 A. No, that's fine, thank you.  
 17 Q. So in the context of Josephine Hamilton's case  
 18 you say this:  
 19 "Clearly the prosecution was wholly wrong as  
 20 was the continual Post Office refutes that the  
 21 system was not at fault. Had I been aware that  
 22 there was knowledge of bugs, errors and defects,  
 23 that could ultimately and significantly affect  
 24 the cash values required to perform  
 25 an acceptable balance and I was expected to  
 105

1 A. I think that there was an awareness that this  
 2 was increasingly being cited, but I was still  
 3 relying on the refutes that were being given  
 4 back to me from the business.  
 5 Q. Could we have on screen, please, document  
 6 reference POL00104593. This is an email chain  
 7 with recipients from Post Office Legal Services  
 8 on both the civil and criminal sides, and  
 9 a number of people from the Security Team. The  
 10 legal contingent included Mandy Talbot and Rob  
 11 Wilson. The Security Team contingent included  
 12 David Posnett, Tony Utting and yourself. The  
 13 top email here is dated 30 September 2004, and  
 14 is from Mandy Talbot.  
 15 You are, as you can see, on the copy list.  
 16 Her email addresses a number of points arising  
 17 from the proposed changes to Post Office  
 18 accounting practices and, in particular, the  
 19 proposed introduction of the branch trading  
 20 statement. So we can see the subject "Trading  
 21 statement".  
 22 Is it likely that you were included on the  
 23 copy list because of the policy and standards  
 24 role that you held reporting to Tony Utting?  
 25 A. Potentially, that would be the case, yes.  
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1 remain mute around these and continue any form  
 2 of role within the Security function, then  
 3 I would have considered my position untenable."  
 4 There are a number of parts to that  
 5 sentence. First, what do you mean by "bugs,  
 6 errors and defects that could ultimately and  
 7 significantly affect the cash values required to  
 8 perform an acceptable balance"?  
 9 A. So I think there I refer to the concept of  
 10 systematic week in, week out, week in, week out,  
 11 bugs, errors or defects impacting the same  
 12 branch with the result that every single week,  
 13 losses were being generated by that branch,  
 14 either because the bug, error or defect was  
 15 artificially reducing the payments line or  
 16 artificially increasing the receipts line, and  
 17 then I go on to say I'd have considered the  
 18 position -- my position to be untenable if I was  
 19 expected to say, "Look, Mr Pardoe, David, we've  
 20 discovered this, but let's just keep it quiet.  
 21 We know it's going on, let's just keep quiet  
 22 about it".  
 23 Q. Just focusing first on what you were aware of,  
 24 were you aware of bugs, errors or defects which  
 25 could cause discrepancies in accounts?  
 106

1 Q. Looking, please, to the seventh paragraph in  
 2 this email, scrolling down a bit, please. It  
 3 starts "If POL is going to". It says:  
 4 "If POL is going to rely on data produced by  
 5 the Horizon system in court, then it will need  
 6 to put in place a standardised witness statement  
 7 signed by a party who can confirm that the  
 8 system was working accurately during particular  
 9 periods of time and that the information  
 10 supplied by the same is reliable. Post Office  
 11 Limited and Horizon will have to identify named  
 12 individuals who are prepared to undertake this  
 13 task, and if necessary who are prepared to  
 14 attend court."  
 15 Do you recall this suggestion from Mandy  
 16 Talbot?  
 17 A. Not specifically from that document,  
 18 unfortunately, no.  
 19 Q. Do you remember it at all, whether in this  
 20 document or elsewhere, the suggestion that, if  
 21 POL were going to rely on data produced by the  
 22 system, then someone would have to produce  
 23 a statement that the system was working  
 24 accurately and the information supplied was  
 25 reliable?  
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1 A. I recall that theme, yes, but, as I say,  
2 unfortunately not from this specific document.

3 Q. Did you understand, either from what Mandy  
4 Talbot was saying here or from anything said by  
5 others, that there may be occasions on which the  
6 Horizon system was not working accurately and  
7 the information supplied was not reliable?

8 A. I don't interpret that, no.

9 Q. Could we have on screen, please, document  
10 reference POL00172808. This is an email from  
11 Mark Dinsdale, dated 12 March 2010, attaching  
12 something called a "Security -- 4 Weekly  
13 Report". You are one of a long list of  
14 recipients. What role did Mark Dinsdale hold at  
15 this time?

16 A. I can only be triggered by the salutation that  
17 he was the Security Programme Manager.

18 Q. What was the "Security -- 4 Weekly Report" and  
19 who did go to?

20 A. I think it was a stakeholder-focused report  
21 around key activities performed by the Security  
22 Team for that period.

23 Q. Could we have on screen, please, the report  
24 itself, which is document reference POL00172809.  
25 The date of the report is the same as the email,

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1 with the rollout of Horizon Online?

2 A. I suspect I would have done, yes.

3 Q. Could we have on screen, please, document  
4 reference POL00165450. This is an email dated  
5 4 June 2014, and if we scroll down a bit,  
6 please, we can see that there is a title  
7 "Update, Service/Systems Down or Offline", and  
8 there is an incident title there. Just  
9 scrolling back up, please, there's a long list  
10 of recipients again, including you.

11 Was this is an email sent to the Grapevine  
12 function, given the date it is being sent?

13 A. It seems to have been sent to a number of the  
14 security function and to other key stakeholders  
15 in the business, as well, from what I can read  
16 through.

17 Q. This is one of a number of documents which  
18 appear in this format. Is this a standard  
19 format email which was sent when there was  
20 a service or systems problem?

21 A. I don't recall that specifically.

22 Q. Scrolling down, please, the "Incident title"  
23 here reads as follows:  
24 "Issues with transfer acknowledgement in the  
25 National Lottery system -- this is causing

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1 12 March 2010. Going, please, to page 3 of this  
2 report, there is a heading here "Security  
3 programmes for products" and, under this, the  
4 fifth bullet point, please, refers to Horizon  
5 Online. It says this:  
6 "Due to live service issues, the decision  
7 has been made not to migrate any further  
8 branches until these issues are fully  
9 understood, necessary actions agreed and success  
10 criteria met. In effect, the Pilot  
11 'stabilisation' period has been brought forward  
12 in order to assure the quality before  
13 proceeding. This will allow Fujitsu some time  
14 to resolve issues, including a higher than  
15 expected number of screen freezes and resultant  
16 recovery transactions."  
17 Did that cause you any concern at all when  
18 you read it?

19 A. Not that I can recollect, no.

20 Q. What did you understand at the time, if you can  
21 recall, by the reference to screen freezes and  
22 resultant recovery transactions?

23 A. I don't recall, sorry.

24 Q. Did you understand from this or from any other  
25 discussions that there were technical problems

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1 duplicate tickets."  
2 The "Current business impact" says this:  
3 "All Camelot branches will not be able to  
4 balance as they have duped transactions."  
5 Under "Case summary", scrolling down,  
6 please, we have this, update 3 June:  
7 "CGI", do you know who CGI were?

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

9 Q. "CGI are process of raising FIX86 to negate the  
10 duplicate Camelot data within Credence. This  
11 should corrected once the overnight batch jobs  
12 have processed."  
13 Update earlier that day below:  
14 "POL are currently looking at providing  
15 branches with Transaction corrections.  
16 "We are in the process of raising FIX86 to  
17 negate the duplicate Camelot data within  
18 Credence."  
19 On its face, this seems to be reporting  
20 a systems issue, meaning that Camelot branches  
21 would not be able to balance; is that your  
22 understanding of it?

23 A. It does, yes.

24 Q. Do you recall receiving this email or any like  
25 it now?

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1 A. Not at all, no.

2 Q. Since you are on the copy list for this, do you  
3 think there was anything about this that might  
4 have concerned you on reading it at the time?

5 A. With hindsight, yes, but I don't recall that  
6 feeling at the time, no.

7 Q. Could we have on screen, please, document  
8 reference POL00165493. This is an email dated  
9 10 July 2014, and scrolling down, please, the  
10 title, the subject, is "Service/Systems  
11 Performance Degraded -- Reference Data Integrity  
12 Not proven error in Horizon". Again, it is sent  
13 to a long list of recipients including you. So  
14 scrolling up, please.

15 Does that appear to you to be the same  
16 varied make-up of stakeholders within the  
17 business?

18 A. It does.

19 Q. Under "Incident Summary" it says this:  
20 "Incident title: Reference Data Integrity  
21 Not proven error in Horizon."  
22 Next to "Current business impact", this  
23 under "Incident summary":  
24 "Fujitsu have confirmed that currently 658  
25 [Post Office] branches are affected. This

113

1 in Horizon"?

2 A. Not at all.

3 Q. Could we have on screen, please, POL00165581.  
4 This is a case closure report, dated 9 October  
5 2014, from Robert Daily. It is sent to Denise  
6 Reid, Brian Trotter and John Breeden, copied to  
7 you, among others. Can you help with why you  
8 were being copied into this case closure report,  
9 given what you have told us about your role by  
10 this point in 2014?

11 A. I suspect that could be custom and practice.  
12 I looked through that, I can see the majority,  
13 if not all, of the senior lead team for Security  
14 being copied into that, the names I recognise  
15 there, Rob King, Sally Smith, John Bigley.  
16 I assume it's just an email cascade.

17 Q. We can see that this case relates to a case set  
18 up on 3 December 2012, relating to a branch  
19 named Gorbals. The "Enquiry Type" is "Cash  
20 Loss". The "Primary Stakeholder" is Denise  
21 Reid, the "Identified 'Criminal Loss'",  
22 scrolling down a bit, please, is £34,179.54.  
23 Scrolling down, please, to "Final Outcome",  
24 and that's in highlight there at the top of that  
25 page:

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1 number is currently increasing."  
2 Next to the "Case summary" here, we see  
3 an update, it probably makes more sense to start  
4 at the bottom:  
5 "INITIAL 10 July 2014 7.42  
6 "Fujitsu have been engaged to investigate."  
7 "Next Update to be at 10.00.  
8 "Fujitsu have logged the incident with BT.  
9 "Fujitsu believe this to be a BT WAN Failure  
10 and are currently trying to correlate  
11 information in relation to the PO branch  
12 locations to identify the geographical nature of  
13 the incident."  
14 Then above, update at 8.47:  
15 "ATOS Incident Management have agreed to  
16 raise this incident to a P1."  
17 Again, can you recall receiving this email  
18 now?

19 A. Not at all, no.

20 Q. What do you understand the problem to be in this  
21 instance?  
22 A. Even reading it now, live, I'm absolutely -- I'm  
23 not sure what to make of that.

24 Q. Do you have any idea why the author of this  
25 alert chose to use the words "Not proven error

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1 "PF has decided not to proceed."  
2 Can you help with "PF"? What does that  
3 stand for.  
4 A. Procurator Fiscal, I suspect.

5 Q. Then under "Procedural and organisational  
6 failings", we see "Yes", is recorded. Under  
7 this, a date given is on which procedural and  
8 organisational failings are said to have been  
9 discussed with the primary stakeholder, on  
10 29 January 2013.  
11 Then under "Any other comments", a little  
12 further down, please, it says:  
13 "Angus Crawford PF has cited issues with  
14 Horizon for not proceeding with case."  
15 Do you recall receiving this case closure  
16 report?

17 A. I don't, no. I don't recall that.

18 Q. It appears from it that a case was being dropped  
19 because of issues with Horizon; is that right?  
20 A. Absolutely.

21 Q. Can you help with what those issues were at all?  
22 A. Not at all, no.

23 Q. The form of words you use in your statement,  
24 that you were unaware of bugs, errors and  
25 defects that could ultimately and significantly

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1 affect the cash values required to perform  
 2 an acceptable balance, does this reflect that  
 3 you were aware of bugs, errors and defects which  
 4 might affect a branch's ability to balance, but  
 5 you assumed that, where such problems arose,  
 6 they were either fixed or did not create  
 7 balancing issues which were significant?  
 8 **A.** I think, yes, they were fixed or did not create  
 9 those systematic balance variances.  
 10 **Q.** When do you think you first became aware that  
 11 systems problems could arise which could cause  
 12 balancing problems for banks?  
 13 **A.** Again, I wouldn't be able to state that with any  
 14 great certainty, unfortunately.  
 15 **Q.** Was it before you started making prosecution  
 16 decisions?  
 17 **A.** No.  
 18 **Q.** Was it before you ceased in that role?  
 19 **A.** I don't recall that.  
 20 **Q.** Having the awareness that you did, when  
 21 subpostmasters being criminally investigated and  
 22 prosecuted attributed apparent shortfalls to the  
 23 Horizon system, why did you dismiss these claims  
 24 out of hand?  
 25 **A.** I think that was following on from the repeated

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1 relevance this might have had to  
 2 an investigation or prosecution?  
 3 **A.** No.  
 4 **Q.** It's right, isn't it, that, at the point of  
 5 advising on whether the prosecution test was  
 6 met, the Criminal Law Team would have been  
 7 reliant on Investigators to provide them with  
 8 all relevant material in the case?  
 9 **A.** It was, yes, yes.  
 10 **Q.** They would be reliant on your Investigators  
 11 pursuing all reasonable lines of inquiry?  
 12 **A.** Correct.  
 13 **Q.** The same is true at the point of disclosure,  
 14 should a prosecution be brought, isn't it,  
 15 because, if reasonable lines of inquiry are not  
 16 pursued, then there is a risk relevant material  
 17 will not have been obtained?  
 18 **A.** It is.  
 19 **Q.** When you were an Investigator, were you  
 20 conscious that there was an obligation on you to  
 21 pursue lines of inquiry which pointed away from,  
 22 as well as towards, the guilt of the suspect?  
 23 **A.** Correct, yes.  
 24 **Q.** When you led the Fraud Strand or Security  
 25 Operations function, were you satisfied that

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1 business assertions that Horizon was fit,  
 2 robust.  
 3 **Q.** The Inquiry has heard evidence that Fujitsu were  
 4 able to access the systems in a branch remotely,  
 5 and alter the data. Were you aware of that?  
 6 **A.** No.  
 7 **Q.** Had you been aware, would this have concerned  
 8 you?  
 9 **A.** I'd have expected that the sufficient safeguards  
 10 would have been in place to maintain the probity  
 11 of the system. I wouldn't have felt technically  
 12 competent to be able to challenge that, per se.  
 13 **Q.** The Inquiry has also heard evidence that there  
 14 were occasions on which the Post Office did not  
 15 tell Horizon users, who had been identified as  
 16 affected by a bug, error or defect, that they  
 17 had been so affected. Were you aware of this?  
 18 **A.** Not at all, no. No.  
 19 **Q.** Had you been aware, would this have concerned  
 20 you?  
 21 **A.** Absolutely.  
 22 **Q.** As far as you are aware, did the Post Office  
 23 ever consider that there might be discrepancies  
 24 which had been caused by an issue with the  
 25 system, of which the user was unaware, and the

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1 your Investigators understood their obligation  
 2 to pursue lines of inquiry which pointed away  
 3 from, as well as towards, the guilt of the  
 4 suspect?  
 5 **A.** I was at the time.  
 6 **Q.** How did you satisfy yourself that that was the  
 7 case?  
 8 **A.** I think there was a blanket belief that some of  
 9 the explanations being given, as astounding as  
 10 it sounds, were not relevant to the case.  
 11 **Q.** When you were an Investigator, were you aware  
 12 that there was a duty on you as an Investigator  
 13 to obtain and consider third-party material  
 14 from, for example, financial institutions and  
 15 Fujitsu, in appropriate cases?  
 16 **A.** As an Investigator, not from Fujitsu. That  
 17 would not have been applicable. But certainly  
 18 we'd seek with authority information from  
 19 financial institutions.  
 20 **Q.** So you're saying Investigators would not have  
 21 sought material from Fujitsu?  
 22 **A.** Apologies, I thought you said when I was  
 23 an Investigator.  
 24 **Q.** Ah, when you were an Investigator, I see. When  
 25 you led the Fraud Strand and Security Operations

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1 function, were you satisfied that your  
 2 Investigators understood there was a duty to  
 3 obtain and consider third-party material, in  
 4 an appropriate case?  
 5 **A.** At the time, yes.  
 6 **Q.** How did you satisfy yourself that that was the  
 7 case, that your Investigators understood that  
 8 obligation relating to third-party disclosure or  
 9 material?  
 10 **A.** Again, I'd have expected that to have been  
 11 covered through formal training. I'd have  
 12 expected that to have been reiterated by team  
 13 leaders and I would have expected that to be  
 14 directed, as well, by the Criminal Law Team, if  
 15 they could see there was a particular absence or  
 16 omission within a set of case papers.  
 17 **Q.** In terms of disclosure, it's right, isn't it,  
 18 that the Investigator in the case was normally  
 19 also the Disclosure Officer?  
 20 **A.** Almost without exception, yes.  
 21 **Q.** Do you recall the three Rs which apply to  
 22 disclosure: retain, record, reveal?  
 23 **A.** I do.  
 24 **Q.** What were the provides within the Post Office to  
 25 ensure that these fundamental disclosure

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1 **Q.** Does it follow that you can't help with whether  
 2 there are any processes in the Post Office  
 3 Security Team to ensure that there was proper  
 4 recording of information going to the operation  
 5 of Horizon which had been raised in prior  
 6 prosecutions?  
 7 **A.** I can't, yes, that's correct.  
 8 **Q.** Which part of the Post Office was the repository  
 9 for information or evidence about bugs, errors  
 10 and defects in Horizon?  
 11 **A.** It would have sat with one of the IT functions.  
 12 I can't be more specific than that  
 13 unfortunately. There would have been functions  
 14 that would have phased into Fujitsu. I can't be  
 15 more specific.  
 16 **Q.** Were Investigators informed or kept updated  
 17 about significant changes to Horizon or about  
 18 any problems, bugs, errors or defects, that the  
 19 Post Office was aware of?  
 20 **A.** I suspect from documentation that's been  
 21 produced as part of the Inquiry that that was  
 22 not always the case.  
 23 **Q.** Was there, as far as you were aware, any formal  
 24 coherent approach across prosecutions as to what  
 25 the investigative approach should be when

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1 principles -- retain, record, reveal -- were  
 2 applied to information held by the Post Office?  
 3 **A.** I think across the piste, with hindsight, that  
 4 was seen as an administrative case preparation  
 5 function, as opposed to forming a pivotal  
 6 component of the criminal investigation.  
 7 **Q.** What processes existed within the Post Office  
 8 Security Team to ensure that there was collation  
 9 of information held by the Post Office, going to  
 10 the operation of Horizon?  
 11 **A.** Again, I think that would come back to the fact  
 12 that the relevance of the information was simply  
 13 just not considered.  
 14 **Q.** What processes existed within the Post Office  
 15 Security Team to ensure that there was proper  
 16 recording of information held by the Post Office  
 17 going to the operation of Horizon?  
 18 **A.** Can you just repeat the question, please?  
 19 **Q.** What processes existed within the Post Office  
 20 Security Team to ensure that there was proper  
 21 recording -- as opposed to collation of  
 22 information, recording of information held by  
 23 the Post Office, going to the operation of  
 24 Horizon?  
 25 **A.** I'm not aware of that, sorry.

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1 a subpostmaster sought to rely on Horizon as  
 2 explaining losses which formed the basis of  
 3 a prosecution?  
 4 **A.** No, there wasn't.  
 5 **Q.** Turning, please, to the witness evidence which  
 6 was provided by Fujitsu in support of  
 7 prosecutions brought by the Post Office, in  
 8 terms of the people who you recall from Fujitsu,  
 9 who provided prosecution support, is it right  
 10 that you recall Penny Thomas being involved in  
 11 ARQ requests --  
 12 **A.** I do.  
 13 **Q.** -- and these requests being provided by the  
 14 return of password-protected CD-ROMs?  
 15 **A.** I do.  
 16 **Q.** Could we have paragraph 84 of Mr Pardoe's  
 17 statement on screen, please. That's page 31.  
 18 Towards the bottom of the page, at 84, you say:  
 19 "In terms of additional prosecution support  
 20 then I obviously recall that Fujitsu would  
 21 provide expert witness testimony presented by  
 22 Gareth Jenkins. I'm unsure what the contractual  
 23 basis for this was."  
 24 Your recollection of the involvement of  
 25 Penny Thomas and Gareth Jenkins, does that come

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1 from your time as a Senior Security Manager,  
 2 heading up the Fraud or Security Operations  
 3 strand, or does that come from your time when  
 4 you headed up the Grapevine function?  
 5 **A.** I think Penny Thomas resonates more from heading  
 6 up the Grapevine function. I think that Gareth  
 7 Jenkins will resonate from both Grapevine  
 8 function and from the Fraud Strand function, as  
 9 well.  
 10 **Q.** When you were in Security Operations and making  
 11 decisions on prosecutions, did you understand  
 12 that the prosecution had specific  
 13 responsibilities when they instructed an expert  
 14 to ensure that the expert was properly  
 15 instructed to provide an opinion or questions on  
 16 issues between the parties?  
 17 **A.** Not specifically, and I would have relied  
 18 heavily on the Criminal Law Team to ensure that  
 19 those duties were fulfilled.  
 20 **Q.** The same question in relation to whether you  
 21 were aware that such instructions should be  
 22 confirmed by anyway of a written document?  
 23 **A.** I'm not aware of that.  
 24 **Q.** And that the expert understood what the expert's  
 25 duties to the court entailed?

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1 **A.** Yes. I would have been.  
 2 **Q.** Were you aware that there was a duty to record  
 3 the existence of such communications on  
 4 a disclosure schedule?  
 5 **A.** Yes, I would have been.  
 6 **Q.** You address your role in relation to Grapevine  
 7 at paragraph 82 of your statement. Could we  
 8 have that on screen, please. It's page 31.  
 9 Here, you say this:  
 10 "There was a period towards the end of my  
 11 career when I managed the crime intelligence  
 12 function under the heading Grapevine. This  
 13 function acted as the conduit between the  
 14 Operational Investigators and Fujitsu in terms  
 15 of ARQ requests. This was a stringent process  
 16 and covered by a policy that unfortunately  
 17 hasn't been presented to me within supplied  
 18 documents. I didn't act as the gatekeeper to  
 19 requests. I do recall that Dave Posnett would  
 20 get involved in out of course requests in terms  
 21 of size."  
 22 Turning, please, to paragraph 99 over the  
 23 page -- apologies, it's not over the page.  
 24 Page 34, please. At 99, you say:  
 25 "Other than acting in a role that had team

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1 **A.** I would make an assumption that that was the  
 2 case.  
 3 **Q.** Did you know that the instruction of an expert  
 4 gave rise to distinct disclosure obligations on  
 5 the part of the prosecution, including that the  
 6 prosecutor was required to bring to the  
 7 attention of the defence and to the court any  
 8 material which the prosecutor was aware of being  
 9 reasonably capable of undermining the expert's  
 10 opinion?  
 11 **A.** I was not advised of that, no.  
 12 **Q.** Were you aware that there was a particular duty  
 13 to retain communications between the police and  
 14 experts, such as forensic scientists, reports of  
 15 work carried out by experts and schedules of  
 16 scientific material prepared by the expert for  
 17 the Investigator for the purposes of criminal  
 18 proceedings?  
 19 **A.** Appertaining to that particular case or to  
 20 a theme of cases, sorry?  
 21 **Q.** So in the context of the provision of expert  
 22 evidence, specifically by Fujitsu, were you  
 23 aware that there was a duty on prosecutors,  
 24 a disclosure duty, to retain communications  
 25 between the Investigator and the expert?

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1 members who acted as the conduit between Post  
 2 Office Investigators and Fujitsu then I can't  
 3 recall any regular contact with them. Contact  
 4 historically was via the Information Security  
 5 Team."  
 6 Can you recall the Casework Management Team  
 7 having a role as being the point of contact  
 8 between Investigators and Fujitsu.  
 9 **A.** Yes, they would be.  
 10 **Q.** Was that casework management function something  
 11 that came to be part of the Grapevine function?  
 12 **A.** There was a period when that was the case, yes.  
 13 **Q.** You say you cannot recall regular contact with  
 14 Fujitsu but your team had a role in liaising  
 15 with Fujitsu over the production of witness  
 16 evidence. Did you know when you headed up the  
 17 Grapevine function that there was certain things  
 18 which were necessary inclusions in an expert  
 19 report, for example, a statement setting out the  
 20 substance of all instructions received --  
 21 **A.** I did not. No.  
 22 **Q.** -- the materials provided and considered and the  
 23 documents, statements, information or  
 24 assumptions, which are material to the opinions  
 25 expressed --

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1 A. I did not.  
 2 Q. A statement to the effect that the expert has  
 3 complied with his or her duty to the court to  
 4 provide independent assistance, by way of  
 5 objective, unbiased opinion, in relation to  
 6 matters within their expertise --  
 7 A. No.  
 8 Q. And an acknowledgement that the expert will  
 9 inform all parties and, where appropriate, the  
 10 court in the event that his or her opinion  
 11 changes on any material issues?  
 12 A. Again, no.  
 13 Q. It is your evidence that you did not know the  
 14 contractual basis for Mr Jenkins' involvement in  
 15 cases and you had no regular contact with  
 16 Fujitsu. Does it follow that, although you were  
 17 aware that Mr Jenkins would provide expert  
 18 witness testimony, you had no involvement in the  
 19 instruction of Mr Jenkins in any case?  
 20 A. Absolutely. I had no involvement in his  
 21 instruction whatsoever.  
 22 Q. Did you yourself check whether Mr Jenkins had  
 23 been properly instructed, according to the  
 24 principles relating to expert witnesses that  
 25 we've just been through?

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1 this with examples of the bugs, errors and  
 2 defects that had actually applied to those cases  
 3 that you've just recounted to me. In the  
 4 absence of those, then yes, I must make the  
 5 assertion that those prosecutions were wholly  
 6 wrong.  
 7 Q. Well, the question is based on a summary of the  
 8 same paragraph that you've included and that  
 9 wording --  
 10 A. It is.  
 11 Q. -- in relation to each and every one of those  
 12 case studies.  
 13 A. It is.  
 14 Q. Does that remain your position, that you  
 15 consider that the prosecution was wholly wrong?  
 16 A. The prosecution was wholly wrong. If I may just  
 17 go on, there should have been more care and  
 18 attention in supporting the impacted  
 19 subpostmasters to uncover the root cause.  
 20 Q. I do not propose to take you through the papers  
 21 relating to all of these cases but, in relation  
 22 to some cases, you appear to have had greater  
 23 involvement in the progression of the case. In  
 24 particular, I'd like to deal, please, with the  
 25 case of Josephine Hamilton. You note in your

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1 A. No, I'd have made that assumption that that  
 2 check had been conducted end to end by members  
 3 of the Criminal Law Team.  
 4 Q. Is the same true in respect of whether you  
 5 yourself checked whether Mr Jenkins understood  
 6 the expert duties as were required?  
 7 A. Correct. The same would be true.  
 8 Q. And, again, in relation to whether Mr Jenkins'  
 9 witness statements had the necessary in  
 10 conclusions for expert evidence?  
 11 A. And again, the same would be true.  
 12 Q. Turning, please, to some of the specific case  
 13 studies with which you had involvement, is it  
 14 right that, in relation to all of the Inquiry  
 15 criminal prosecution case studies you comment on  
 16 in your statement, that is the cases of  
 17 Josephine Hamilton, Susan Rudkin, Julian Wilson,  
 18 Peter Holmes, Seema Misra, Alison Hall, Lynette  
 19 Hutchings, Grant Allen, Khayyam Ishaq, Angela  
 20 Sefton and Anne Neild, you now consider that the  
 21 prosecution was wholly wrong, as was the  
 22 continual Post Office position that the system  
 23 was not at fault?  
 24 A. I would have more confidence in making that  
 25 assertion if I'd have been approached prior to

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1 statement that this is a case where the  
 2 prosecution was authorised by Tony Utting, who  
 3 is listed on the suspect offender report as the  
 4 Designated Prosecution Authority.  
 5 So this wasn't a case which you authorised  
 6 prosecution in but you did become involved, you  
 7 say in your statement, at a later stage,  
 8 specifically when consideration was being given  
 9 to whether pleas to false accounting charges  
 10 should be accepted; is that right?  
 11 A. That's right.  
 12 Q. This is a case where the charges brought were of  
 13 both theft and false accounting. It is a case  
 14 in relation to which you say you were aware of  
 15 the allegations being made by Mrs Hamilton  
 16 around Horizon IT issues; is that right?  
 17 A. It is.  
 18 Q. You say in your statement that you would have  
 19 read the suspect offender report produced by  
 20 Graham Brander in this case. Would this have  
 21 been when you became involved in consideration  
 22 of plea or before that?  
 23 A. I think the former, in consideration of plea.  
 24 Q. You've had a chance to reread Mr Brander's  
 25 report for the purposes of preparing your

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1 statement for the Inquiry; is that right?  
 2 **A.** It is.  
 3 **Q.** Could we have the report on screen, please. It  
 4 is POL00047955. We see here, as you note, Tony  
 5 Utting is listed as the Designated Prosecution  
 6 Authority. Going to page 5 of this document,  
 7 please, scrolling down, please, we see here the  
 8 author is the Investigator in the case, Graham  
 9 Brander, and the report is dated 17 May 2006.

10 Just pausing there, did Graham Brander  
 11 report to you?  
 12 **A.** He would have been, from memory, a direct report  
 13 to direct report. So he would have reported via  
 14 a team leader into myself.

15 **Q.** Going, please, to page 3 of this document, at  
 16 the top, Mr Brander says this:  
 17 "Having analysed the Horizon printouts and  
 18 accounting documentation I was unable to find  
 19 any evidence of theft or that the cash figures  
 20 had been deliberately inflated."

21 This was a case in which the prosecution was  
 22 for theft as well as false accounting. Did it  
 23 concern you, when you read this report, that  
 24 a prosecution for theft had been brought by the  
 25 Post Office in a case where the Investigator in

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1 Richard Jory. It his email reads as follows:  
 2 "Juliet/Jenee  
 3 "Counsel defending has offered pleas to  
 4 false accounting in this matter (I presume  
 5 counts 2-9 inclusive) and asked me to take  
 6 instructions as to whether this might be  
 7 an appropriate offer. My view is that there is  
 8 evidence she has taken the money and that there  
 9 is sufficient evidence to support theft, but  
 10 Royal Mail may be content with guilty pleas to  
 11 dishonesty matters if she undertook to repay the  
 12 amount of the shortage at audit, ie £36,444.89.  
 13 It might be worth speaking to the officers,  
 14 Graham Brander and Colin Price, to canvass their  
 15 views."

16 Scrolling up, please, to the top of the  
 17 page, the first page, we see an email from  
 18 Graham Brander to Jennifer Andrews and Juliet  
 19 McFarlane, dated 10 October 2007. This email is  
 20 copied to you, among others. Mr Brander says  
 21 this in his email:

22 "Jenee/Juliet  
 23 "I agree with counsel. In my opinion, the  
 24 evidence clearly shows theft (charge 1),  
 25 however, if the defence are offering up guilty

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1 the case was unable to find any evidence of  
 2 theft?

3 **A.** From memory, that was -- I don't think this case  
 4 is isolated in that approach. I think that  
 5 there was quite a common practice by the  
 6 Criminal Law Team.

7 **Q.** What was that practice?

8 **A.** That there would be a charge of theft and then  
 9 also charges of false accounting.

10 **Q.** Could we have on screen, please, document  
 11 reference POL00049083. Starting, please, with  
 12 the email about halfway down this page. This is  
 13 an email from Jennifer Andrews from the Criminal  
 14 Law Team to the SD Prosecution Office, dated  
 15 9 October 2007. Can you help with what the SD  
 16 Prosecution Office's role was?

17 **A.** No, I can't, no. No. Sorry, I'm not familiar  
 18 with that term.

19 **Q.** This email is copied to Graham Brander, Colin  
 20 Price and Juliet McFarlane. As we can see from  
 21 the subject of the email, it relates to the case  
 22 against Josephine Hamilton. Ms Andrews is  
 23 forwarding an email from counsel for the Post  
 24 Office in the case, Richard Jory. So scrolling  
 25 down, please, to the next page. We see there

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1 pleas to all false Accounting charges (2-15 on  
 2 my copy of the indictment), then I would suggest  
 3 we accept this on the understanding that  
 4 Mrs Hamilton agrees to repay the full amount ...

5 "Any decision in respect of whether we  
 6 accept this would need to be made by Dave  
 7 Pardoe."

8 Should we take it from this that, at least  
 9 in this case, the decision on acceptance of  
 10 a plea needed to come from you?

11 **A.** Yes.

12 **Q.** Was that always the case, that the Senior  
 13 Security Manager needed to agree any plea  
 14 agreement?

15 **A.** No, absolutely not. Many of these decisions  
 16 would have been made quite dynamically on the  
 17 day, so they would have been made in court on  
 18 the day without any reference to myself and  
 19 rather with reference to the Criminal Law Team.

20 **Q.** Could we have on screen, please, document  
 21 reference POL00049154. This is a memo dated  
 22 15 November 2007 from Juliet McFarlane. If we  
 23 scroll down, please, at the bottom there, to the  
 24 Investigation Team. Going back up, please,  
 25 copied to Graham Brander, Ged Harbinson and you,

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1 it reads as follows:

2 "I refer to previous correspondence  
3 regarding this matter.

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

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

17 "One option would be for the theft count to  
18 be left on file pending payment by the date of  
19 trial or some later date."

20 Ms McFarlane is essentially saying that  
21 pleas to false accounting would be agreeable,  
22 conditional upon Mrs Hamilton repaying the full  
23 amount of the apparent shortfall, isn't she?

24 **A.** Absolutely.

25 **Q.** This is in circumstances where, regardless of  
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1 charge, yes.

2 **Q.** At the time, did you think it was appropriate to  
3 make acceptance of pleas to false accounting  
4 dependent on Mrs Hamilton repaying the full  
5 amount of the apparent shortfall?

6 **A.** I didn't, no, because that had been almost  
7 custom and practice from myself being quite  
8 a junior investigator all the way through my  
9 tenure with the Post Office, that had been  
10 an adopted practice. This by no means struck me  
11 as being a one-off case.

12 **Q.** So, in answer to that, you think at the time you  
13 thought that it was appropriate?

14 **A.** I didn't think any different. It's something  
15 that I'd -- my professional career within the  
16 security function had grown up with.

17 **Q.** You're aware now, aren't you, that the way this  
18 was dealt with, making repayment a condition of  
19 dropping the theft charge, was criticised by the  
20 Court of Appeal when it overturned  
21 Mrs Hamilton's conviction. They said that it  
22 placed undue pressure on Mrs Hamilton. You're  
23 aware of that now, aren't you?

24 **A.** Indeed, yes.

25 **Q.** There is a memo from Juliet McFarlane also --  
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1 the assessment of counsel and the Investigator  
2 in the case at this point, originally in the  
3 investigator report the Investigator had found  
4 no evidence of theft or even the cash figures  
5 being deliberately inflated.

6 **A.** Correct.

7 **Q.** You say in your statement at paragraph 108 that  
8 you link the ultimate agreement to drop the  
9 theft charge to the lack of theft evidence. Is  
10 that a fair summary of your paragraph 108?

11 **A.** Absolutely, yes.

12 **Q.** We can see that Ged Harbinson's view was being  
13 sought -- if we scroll down a little, please --  
14 on the prospects of recovery by a confiscation  
15 order should pleas be entered on the false  
16 accounting. Is it fair to say that the  
17 prospects of recovery of the money was a key  
18 consideration for the Post Office when  
19 considering what plea might be agreeable?

20 **A.** It would have been one consideration.

21 I wouldn't describe it as key but, certainly, it  
22 would have been one consideration. I do recall  
23 it would have been more problematic to secure  
24 confiscation based on the false accounting  
25 piece, than on a conviction for a straight theft  
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1 well, dated 19 November 2007, which you were  
2 copied into. Can we have that on screen,  
3 please. The reference is POL00044388. We can  
4 see that the memo goes to the Investigation  
5 Team, copied specifically to Graham Brander, Ged  
6 Harbinson and you. It reads as follows:

7 "The Defendant appeared before the court  
8 today. The prosecution was represented by  
9 Mr Richard Jory of 9-12 Bell Yard, London ...  
10 and the Defendant was represented by Anita  
11 Saran.

12 "The Defendant pleaded guilty to the false  
13 accounting counts 2-15 on the indictment. The  
14 case has been adjourned ... for pre-sentence  
15 reports.

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

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

3 "I not that the compensation outstanding is  
4 [and there's the figure].

5 "I note that the figure canvassed [the  
6 higher sum] is a sum which includes interest,  
7 the greatest sum will no doubt be pursued should  
8 confiscation proceedings be brought."

9 Then this, at the penultimate paragraph:

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

16 You were aware that Mrs Hamilton had raised  
17 allegations that the Horizon system was not  
18 working properly and this memo is making clear  
19 the Post Office position, that a plea on the  
20 basis the loss was due to the computer not  
21 working properly would not be accepted. We've  
22 seen reference in the email of 10 October from  
23 Mr Brander to the decision on plea ultimately  
24 being a matter for you. Was this a stipulation  
25 which came from you or not?

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1 practice.

2 **Q.** Was this practice to bring charges for theft, as  
3 well as false accounting, intended to put  
4 pressure on a defendant to plead guilty to  
5 a lesser plea -- to a lesser charge, forgive me?

6 **A.** I can only make that assumption that that's the  
7 case, yes.

8 **Q.** The concluding paragraphs in your statement are  
9 set out at 180 to 181. Could we have that on  
10 screen, please. This is page 54 of the  
11 statement. You say at paragraph 180:

12 "The more I see and hear from the Inquiry,  
13 then the further I despair. It strikes me that  
14 no one, at a suitable level of seniority, had  
15 the conviction and gumption to say enough is  
16 enough and to drive a timely, truly independent  
17 review whilst ceasing all prosecution activity  
18 and having the courage to be prepared to support  
19 the application and lessons of a truly  
20 independent Horizon review to both historic  
21 prosecutions and non-prosecuted repayment of  
22 accounting shortfalls. As someone that held  
23 several investigatory roles in the Post Office,  
24 I feel utterly deceived."

25 You go on to say:

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1 **A.** Absolutely not.

2 **Q.** Was it a stipulation with which you agreed?

3 **A.** I'm not sure I thought that at the time, whether  
4 he agreed or disagreed with it. It was  
5 a stipulation. I'm fairly sure it wasn't in  
6 isolation just towards this case. I think it  
7 was part of the whole Horizon defence piece that  
8 was being practised across the Post Office at  
9 the time.

10 **Q.** Was this is an example of a Post Office line to  
11 take, that the computer not working properly was  
12 not to be entertained as a defence to a criminal  
13 allegation?

14 **A.** I think that's fair to say, yes.

15 **Q.** You say in your statement at paragraph 138 that  
16 you can say that dropping the theft charge in  
17 relation to acceptance of falsification of  
18 accounts was certainly not unheard of. Is that  
19 the same point that you've already made that  
20 this is --

21 **A.** It is indeed, yes.

22 **Q.** -- part and parcel of a wider picture?

23 **A.** It is indeed, and it certainly wasn't a recent  
24 thing, you know. As I said, even from being  
25 a junior investigator, it would be custom and

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1 "With hindsight there should have been  
2 a team of skilled analysts working on behalf of  
3 branch errors, conducting full error analysis  
4 using complete and unabridged Fujitsu data  
5 including all reversals. This level of  
6 transparency would have supported SPMRs to come  
7 forward at low level loss stage rather than  
8 being pushed into systematic false accounting  
9 series."

10 You have made fairly plain your position in  
11 relation to the Post Office stance relating to  
12 the Horizon system. Looking back, do you think  
13 that you bore any responsibility for the  
14 perpetuation of the Post Office stance in  
15 relation to Horizon?

16 **A.** I was part of that groupthink and it would be  
17 remiss of me to sit here today and say that  
18 I didn't.

19 **Q.** Looking back, do you think you bore any  
20 responsibility for what happened to the  
21 individuals who were affected?

22 **A.** I think, in the absence of a more complete  
23 ability to conduct investigations into those  
24 conditions, then yes.

25 **MS PRICE:** Sir, those are all the questions that

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1 I have for Mr Pardoe. There are some questions  
2 from Core Participants.

3 **SIR WYN WILLIAMS:** All right. Who is going first?

4 **MS PRICE:** Mr Jacobs, sir.

5 **SIR WYN WILLIAMS:** Yes.

6 **Questioned by MR JACOBS**

7 **MR JACOBS:** Thank you, Mr Pardoe.

8 I don't know if you can hear me, I don't  
9 have the microphone switched on.

10 **A.** I can.

11 **Q.** You can. Good.

12 I'm going to be asking you about Peter  
13 Holmes and Marion Holmes, his widow, sits next  
14 to me today. You deal with the prosecution of  
15 Peter Holmes at paragraphs 130 to 134 of your  
16 statement. In Mr Holmes's case, the Court of  
17 Appeal found that his prosecution had been  
18 an abuse of process, there was no evidence to  
19 corroborate the Horizon evidence, there was no  
20 investigation into the integrity of the Horizon  
21 figures and there was no proof of any actual  
22 loss to the Post Office. Were you aware of that  
23 or are you now aware of that?

24 **A.** I'm now aware of that but I'm only aware through  
25 my involvement today in the Inquiry.

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1 over you -- is that I would have not felt  
2 professionally equipped to counter a decision  
3 that's been made by a senior or principal lawyer  
4 in the matter.

5 **Q.** Well, that's helpful. Thank you.

6 **A.** Thank you.

7 **Q.** At paragraph 132 of your statement, in relation  
8 to Mr Holmes' case, you say:

9 "I can see that Horizon difficulties have  
10 been cited. Again, these assertions would have  
11 been transacted with the fact that a steady  
12 stream of denials were being issued by Post  
13 Office."

14 So your position is that it was the Post  
15 Office's repeated assertions, as you've said,  
16 that was factoring into these prosecution  
17 decisions; is that right?

18 **A.** Absolutely.

19 **Q.** You make a statement at paragraph 134 in  
20 relation to Mr Holmes' case, which is similar to  
21 the statement in fact -- it's worded the same --

22 **A.** It is.

23 **Q.** -- as what you say in relation to others. You  
24 say the prosecution was wholly wrong, which of  
25 course the Court of Appeal have found, and you

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1 **Q.** Yes. You say at paragraph 131 of your evidence  
2 that you were the nominated representative in  
3 the case.

4 **A.** For prosecution purposes, yes.

5 **Q.** Yes. Is that the same as the Designated  
6 Prosecution Authority because I think that's how  
7 your name appears on some of the documents?

8 **A.** It is, it is.

9 **Q.** Just for completeness, you say at paragraph 56  
10 of your evidence that the job of the Designated  
11 Prosecution Authority or nominated  
12 representative was to confirm the CLT decision,  
13 check the decision for fairness and objectivity  
14 and place the case into prosecution status; is  
15 that right?

16 **A.** Correct.

17 **Q.** So you're effectively authorising a decision  
18 that's already been made?

19 **A.** Correct.

20 **Q.** Would you describe it as a rubber stamping  
21 exercise in any way?

22 **A.** I think I've already referred to it in that  
23 manner.

24 **Q.** Okay, thank you.

25 **A.** The position I adopted -- apologies, for talking  
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1 say, "Had I been aware that there was knowledge  
2 of bugs, errors and defects", and you go on to  
3 say, "that could ultimately affect significantly  
4 cash values, require to perform an acceptable  
5 balance", and you were expected to remain mute  
6 around these, and continue in your Security  
7 function, you would have considered your  
8 position untenable.

9 Now, the Inquiry has heard evidence that  
10 there was knowledge of bugs, errors and defects  
11 within Post Office and Fujitsu, certainly at the  
12 time of Mr Holmes' prosecution. Is that  
13 something that you're aware of, isn't it?

14 **A.** I'm not aware of it at that time.

15 **Q.** Right. No, at the time you weren't aware of it  
16 but have you become aware of that now through  
17 following the Inquiry?

18 **A.** Sorry, absolutely.

19 **Q.** We understand, then, that your evidence is that  
20 information of the knowledge of bugs, errors and  
21 defects that Post Office had was withheld from  
22 you; is that right?

23 **A.** I can only assume that, yes.

24 **Q.** Then it must follow from that, that had this  
25 information -- and Mr Holmes had repeatedly, in

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1 his interview, blamed and criticised the Horizon  
2 system -- had this information not been withheld  
3 from you, it must follow that you would not have  
4 authorised Mr Holmes' prosecution?

5 **A.** Correct.

6 **Q.** Well, thank you for that.

7 If I could then ask you to turn to  
8 paragraph 78 of your witness statement. Now,  
9 that's page 29 of 62, and the reference is  
10 WITN08170100. You should have that on the  
11 screen in a minute, unless I've given the wrong  
12 number of course. Here it is, 78. So if we  
13 could perhaps scroll down and you say here:

14 "I recall with an element of clarity updates  
15 from John Scott assuring the Security function  
16 that the system was reliable, and we were [able  
17 to] continue with BAU activity."

18 I assume that's "business as usual"?

19 **A.** It is.

20 **Q.** So in relation to the clarity of your  
21 recollection, what can you tell us the Inquiry  
22 about the detail of these updates, their dates,  
23 their frequency?

24 **A.** I couldn't go into that level of granularity,  
25 apologies.

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1 this is likely to be out within the public  
2 domain and the approach we're taking is this,  
3 this, this and this", to paraphrase.

4 **Q.** Would that have been before the Computer Weekly  
5 article in 2009, perhaps?

6 **A.** It could have been around about the same time.

7 **Q.** But it was a clear communication, and who was it  
8 addressed to, or --

9 **A.** I think it went to everybody. It wasn't  
10 Security family specific. I'm sure it went to  
11 everybody.

12 **Q.** So the whole organisation was told "There's  
13 going to be something in the media about Horizon  
14 and it is to be disregarded because everything  
15 is robust and" --

16 **A.** I certainly recall a -- reading a written  
17 rebuttal and position that the business were  
18 adopting, yes.

19 **Q.** You said in your evidence at around about 11.45  
20 this morning, when you were taken to Mr Jarnail  
21 Singh's email after the Seema Misra trial, you  
22 said that Horizon bashing sentiment was being  
23 used at every level. How frequently were you  
24 hearing this and what sort of people and what  
25 sort of roles were responsible?

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1 **Q.** But when you say "with clarity", are you able to  
2 say the wording, what was being said, how often?  
3 Who it was addressed to?

4 **A.** I'm unfortunately not, no.

5 **Q.** Okay.

6 **A.** There was a persistent sentiment that the system  
7 was fit for purpose. I was never in a meeting  
8 when it was discussed with me the concept of  
9 putting the brakes on prosecution activity.  
10 It's clear that there was a fear that, to do  
11 that, would immediately cast doubt on  
12 prosecutions that had been completed that had  
13 gone before. I was never privy to that type of  
14 conversation, no.

15 **Q.** But I think we can see from your statement that  
16 this was coming from John Scott?

17 **A.** It's coming from John Scott. The one I remember  
18 probably with greater clarity is the Paula  
19 Vennells communication.

20 **Q.** I was going to ask you about that, yes, if you  
21 can carry on.

22 **A.** I'm sure that that preceded known media interest  
23 that was imminently about to go public, and I'm  
24 sure that there was some form of written  
25 communication to say, you know, "Look, folks,

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1 **A.** I just recollect it being a consistent  
2 organisational theme, that there was nothing  
3 wrong with Horizon; it was simply a hook that  
4 individuals were attaching themselves to, to try  
5 to explain unexplained losses that were being  
6 incurred at branch. It was almost the modern  
7 theme, rather than place blame on employees. It  
8 was, you know, almost more palatable just to  
9 place blame on the Horizon system. It was just  
10 a whole sentiment at the time.

11 **Q.** Does this arise from what the Chief Executive  
12 Officer had been saying and what John Scott had  
13 said?

14 **A.** It was all -- everything that was building up to  
15 form of sentiment, yes.

16 **Q.** Right. Now you were taken a moment ago by  
17 Ms Price to what you say at the end of your  
18 statement at paragraphs 180 and 181. What you  
19 end with in paragraph 180, is you say:

20 "As someone that held several investigatory  
21 roles in the Post Office, I feel utterly  
22 deceived."

23 Now, as the person who authorised Mr Holmes'  
24 prosecution, do you have anything to say to  
25 Mrs Holmes and to other subpostmasters about

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1 that deception?

2 **A.** Absolutely. I was omitted from -- I believe,

3 from key information that would have helped me

4 to direct investigation resource and support

5 individuals.

6 **Q.** Do you have anything you wish to say to

7 Mrs Holmes herself?

8 **A.** I wonder if any words I could express would help

9 to resolve what happened. I really do,

10 genuinely do.

11 As I said, you know, I go back to my time at

12 district days when we were supported and

13 encouraged to support on a one-to-one basis

14 subpostmasters, and the business, fast forwards

15 10, 20 years, rather than improve that level of

16 support, it appears to have just stepped

17 backwards from it.

18 **MR JACOBS:** Thank you. I haven't any further

19 questions.

20 **THE WITNESS:** Thank you very much.

21 **SIR WYN WILLIAMS:** Anyone else?

22 **MR HENRY:** Thank you, sir, Mr Henry, please.

23 **Questioned by MR HENRY**

24 **MR HENRY:** Mr Pardoe, I represent number of

25 subpostmasters whose lives were destroyed by the

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1 as opposed to it being a fundamental part of

2 a proper and correct investigation.

3 **Q.** So in other words lip-service, administrative

4 tick box, saying one thing but meaning or doing

5 another, as opposed to a profound adherence to

6 the principle of disclosure?

7 **A.** From all levels, yes.

8 **Q.** Right. Were you aware that, in conducting

9 an investigation, an Investigator should pursue

10 all reasonable lines of inquiry, whether they

11 pointed towards or away from a suspect?

12 **A.** Of course, yes.

13 **Q.** You were. So you agree with me that it ought

14 not to be about money; it ought to be this is

15 a very important obligation which rests on our

16 shoulders and we should discharge it to the best

17 of our ability, whatever the cost? You agree

18 with that in principle?

19 **A.** I do.

20 **Q.** And that matters that pointed away from the

21 suspect ought to have a high value, so far as

22 the investigation is concerned?

23 **A.** Where considered relevant, I do, yes.

24 **Q.** Now, I want to ask you, please -- we're just

25 going to concentrate on one document and it's

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1 Horizon IT scandal. You would agree, as

2 a general principle, that you cannot put a price

3 on justice --

4 **A.** I would.

5 **Q.** -- and that, in the discharge of the Post

6 Office's duty as a private prosecutor, money

7 ought to have been no object in ensuring that it

8 fulfilled and complied with its obligations?

9 **A.** I would.

10 **Q.** So you were aware -- maybe not the Section of

11 the Criminal Procedure and Investigations Act --

12 but you were aware that material which might

13 reasonably be considered capable of undermining

14 the case for the prosecution against an accused

15 or of assisting the case for the accused, ought

16 to be disclosed?

17 **A.** I think there was a view being taken around the

18 relevance of that and that it simply -- as

19 astounding as it sounds to sit here today, that

20 it simply was not relevant.

21 **Q.** Well, that is a decision which is either so

22 irrational or it is taken in bad faith. Is

23 there anything you'd like to say about that?

24 **A.** I think the issue of disclosure, there was

25 a focus on that on the administrative discharge,

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1 POL00064033. It's a Financial Investigation

2 Policy log, compiled by a man called Mick

3 Matthews, whom I think you recall.

4 **A.** I do.

5 **Q.** You do. Well, I wonder if that could be put up

6 on screen so that you can see it. If we just go

7 through it briefly, this is what Mr Matthews

8 says. He has:

9 "... commenced an investigation into

10 Ms Janet Louise Skinner, ex-subpostmaster of

11 North Bransholme Post Office. She is under

12 investigation for the suspected theft of [nearly

13 £60,000] whilst she was employed as

14 a subpostmaster. This investigation is for the

15 purpose of identifying money laundering offences

16 and confiscation. The investigation will be

17 proportionate, have a legal framework,

18 accountable and necessary."

19 Then it says:

20 "It will follow of the legal requirements of

21 the Proceeds of Crime Act, the Police and

22 Criminal Evidence Act, Criminal Procedure and

23 Investigations Act and Regulation of

24 Investigatory Powers Act. It will also be

25 European Convention on Human Rights compliant",

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1 et cetera, et cetera.

2 What I want to put to you, sir, is that the  
3 prosecution is not what it says or the Post  
4 Office is not what it says, but what it does.  
5 It's got to be judged on its actions; do you  
6 agree with that?

7 **A.** I do.

8 **Q.** You do. On 7 December 2006, Diane Matthews, who  
9 recently gave evidence, reported that Wendy  
10 Lyell, the replacement subpostmaster at North  
11 Bransholme, had been suspended on suspicion of  
12 theft and that Diane Matthews was to establish  
13 the details. So it followed that Ms Skinner was  
14 accused of the suspected theft of nearly  
15 £60,000 pounds and, at the time, she was in  
16 negotiations to settle this by way of a plea to  
17 false accounting. You may not have been aware  
18 of that.

19 **A.** No.

20 **Q.** But let me just briefly ask you to consider  
21 this: Ms Skinner had been ringing up the  
22 Helpdesk time and time again, complaining about  
23 the system, and then, lo and behold, her  
24 replacement is then, a few weeks after that,  
25 suspended on suspicion of theft. Those two

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1 "Received an email from Dave Pardoe my new  
2 Line Manager to the effect that no further  
3 resources were to be expended on the case in  
4 respect of Wendy Lyell."

5 Do you recall contacting Mr Matthews and  
6 telling him not to pursue his enquiries into  
7 Wendy Lyell.

8 **A.** Absolutely not.

9 **Q.** 27 August:

10 "It occurred to me that in the interests of  
11 justice we could be rightly criticised for not  
12 carrying out a comprehensive investigation into  
13 Wendy Lyell. I spoke with and asked him [that's  
14 you, Mr Pardoe] to reconsider allocating  
15 resources in order for the matter to be further  
16 investigated."

17 You are reported to have said, Mr Pardoe,  
18 that:

19 "... if we are criticised, so be it, no  
20 further investigation resource was going to be  
21 allocated."

22 Do you recall saying that to Mr Matthews?

23 **A.** I don't recall that position and it wouldn't be  
24 something that I'd adopt within my leadership  
25 style.

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1 facts were capable, were they not, of suggesting  
2 that the system was at fault, not the  
3 individual; do you agree?

4 **A.** I don't understand the full context of the case,  
5 but that's a potential, yes.

6 **Q.** That's a potential. Now, that was as long ago  
7 as December '06. On 22 May, Mr Matthews spoke  
8 to a person called Juliet, as it occurred to him  
9 that the defence would say that Ms Skinner has  
10 not benefited from crime, as it was a member of  
11 staff.

12 Sorry, could you scroll down, I do  
13 apologise.

14 I'm scrolling my screen, but unfortunately  
15 yours is not.

16 What I want to go to is that on 22 May 2007,  
17 and this is page 2 of 3, Mr Matthews says:

18 "It occurred to me that I had not made any  
19 enquiries about Wendy ..."

20 He describes her there as "Liddell"; in fact  
21 it's Lyell.

22 "I looked through the event log and read the  
23 entry date, 7 December. I had overlooked,  
24 pursuing the matter. Decided to find out what  
25 the current position was.

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1 **Q.** It's not a question of costs, as you rightly  
2 said at the outset, because costs shouldn't have  
3 anything to do with the discharge of justice.  
4 Were you aware, Mr Pardoe, of the problems with  
5 the system and that this might reveal, with  
6 stark clarity, the problems in the system?

7 **A.** Not at all.

8 **Q.** Further, 27 August:

9 "Following the conversation it occurred to  
10 me that the defence in the interests of justice  
11 may well be entitled to a comprehensive  
12 investigation and it is my view that one should  
13 be carried out. Spoke with Dave again and he  
14 said he did not agree and he was maintaining his  
15 position."

16 Mr Pardoe, do you recall that conversation?

17 **A.** Absolutely not.

18 **Q.** It's been put there fairly and squarely in this  
19 report by Mr Matthews. How would this report be  
20 circulated, sir? It's obviously got a purpose,  
21 hasn't it?

22 **A.** Well, it's a log of Proceeds of Crime type  
23 activity, of POCA activity.

24 **Q.** Right:

25 "Following the conversation it occurred to

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1 me that the defence in the interests of justice  
 2 may well be entitled to a comprehensive  
 3 investigation ..."

4 He was spelling this out to you, wasn't he?

5 **A.** Until it was presented to me as part of the  
 6 Inquiry bundles, I had no knowledge of this  
 7 document.

8 **Q.** It is not a question of you having knowledge of  
 9 this document. I am now asking you to recall,  
 10 on your oath or affirmation, what was said on  
 11 27 August 2007 when Mr Matthews was saying that,  
 12 in the interests of justice, the defence may  
 13 well be entitled to a comprehensive  
 14 investigation and that one should be carried  
 15 out. Are you saying you do not recall that?

16 **A.** From 16 years ago, absolutely.

17 **Q.** Do you think this is a demonstration of the  
 18 groupthink of the siege mentality in action, the  
 19 very thing --

20 **A.** Sorry. I apologise. I would need to understand  
 21 the context of that. I really would.

22 **Q.** You would. You would agree?

23 **A.** No, I said I'd need to understand the full  
 24 context. I do not recognise -- we all have  
 25 a certain leadership style. I do not recognise

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1 inquiry?

2 **A.** Allegedly contradict him.

3 **Q.** Nothing is served by repetition but I'm, for the  
 4 last time, just now, asking you, knowing the  
 5 solemnity of this moment and knowing what  
 6 happened to the people I represent, is there  
 7 anything you would like to say arising from what  
 8 you have read and what I have put to you in this  
 9 document?

10 **A.** I do not recall the document whatsoever.

11 **SIR WYN WILLIAMS:** Is that it, Mr Henry?

12 **MR HENRY:** That is it. Thank you.

13 **SIR WYN WILLIAMS:** Any other questions from anyone?

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

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

17 Then thank you, Mr Pardoe, for  
 18 a comprehensive witness statement and answering  
 19 a good many questions today. I'm sorry if it  
 20 was inconvenient for you to start at 9.00. That  
 21 was because I have to go somewhere shortly.

22 Those who were listening to your evidence  
 23 with a personal interest in it, I hope they  
 24 found it informative.

25 So thank you all, everyone, and we will

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1 my leadership style within that. I do not see  
 2 what I would have to gain from reducing activity  
 3 in that area by one of my, at the time,  
 4 Financial Investigators. I don't understand the  
 5 context of that whatsoever.

6 For me, it seems such a cursory thing that  
 7 I would just authorise further investigations as  
 8 required. There was nothing to be gained by me  
 9 in saying that, you know, under no circumstances  
 10 should resource be applied to that. There would  
 11 simply be nothing to be gained.

12 **Q.** Well, isn't this actually a way for you to  
 13 acknowledge what you have, by implication,  
 14 accused others of, which is the groupthink,  
 15 which is "We have to protect" -- this is the  
 16 theme, "we have to protect Horizon at all  
 17 costs"?

18 **A.** Not at all.

19 **Q.** Because there it is. It's simple, unambiguous  
 20 language. It occurs to Mr Matthews that, in the  
 21 interests of justice, the defence may well be  
 22 entitled to a comprehensive investigation and  
 23 that one should be carried out. You contradict  
 24 him, state you do not agree, and maintain your  
 25 position that you are not going to fund that

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1 begin again at 10.00 tomorrow morning.

2 **MS PRICE:** Yes, sir. Thank you.

3 **(1.50 pm)**

4 **(The hearing adjourned until 10.00 am**  
 5 **the following day)**

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[7]</b> 47/2 105/19 130/21 131/5
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