

Tuesday, 5 December 2023

1
2 (11.00 am)
3 **MR BEER:** Good morning, sir, can you see and hear
4 us?
5 **SIR WYN WILLIAMS:** Yes, I can, thank you.
6 **MR BEER:** Thank you very much. Sir, as everyone
7 knows, we're sitting today between 11.00 am and
8 2.30 pm, and certainly no later than 2.30 pm.
9 If it suits you, sir, I would propose that we
10 take half an hour's break between 12.30 and 1.00
11 so that the evidence sessions are split into 2
12 one and a half hour slots.
13 **SIR WYN WILLIAMS:** That's fine by me, and I take it
14 that's okay with the transcriber?
15 **MR BEER:** We'll see how we go, if it becomes
16 a problem, then I'm sure she will let us know.
17 **SIR WYN WILLIAMS:** Yes. Fine.
18 **MR BEER:** Sir, can I call David Posnett, please.
19 **DAVID POSNETT (sworn)**
20 **Questioned by MR BEER**
21 **MR BEER:** Good morning, Mr Posnett. My name is
22 Jason Beer and I ask questions on behalf of the
23 Inquiry. Can you please tell us your full name,
24 please.
25 **A.** David Posnett.

1

1 31 years; is that right?
2 **A.** That is right, yes.
3 **Q.** I think you started in '87; is that right?
4 **A.** It was 1986.
5 **Q.** '86, that's right, and finished in 2017?
6 **A.** That's correct, yes.
7 **Q.** So '86 to 2017, 31 years?
8 **A.** Yes.
9 **Q.** You started life in the Post Office as a counter
10 clerk; is that right?
11 **A.** That's right, yeah.
12 **Q.** I think that job lasted for eight years until
13 about '95, is that right: 9 years until '95?
14 **A.** About that. It's about that, yes.
15 **Q.** Then in 1995 you started a new role as
16 an Auditor; is that right?
17 **A.** That's correct.
18 **Q.** Whereabouts were you based as an Auditor?
19 **A.** I was based in Guildford.
20 **Q.** Did you have any professional or other
21 qualifications to be an Auditor?
22 **A.** No.
23 **Q.** I think you stayed in that role for four years
24 or so until 1999, when you took up a job as
25 a joint business testing analyst; is that right?

3

1 **Q.** Thank you. Thank you very much for coming to
2 give evidence to the Inquiry today and for the
3 provision of a detailed witness statement to
4 assist us in our investigation.
5 Can we start by looking at that document,
6 please. I think you've got it in front of you
7 at tab A1. It should be dated 4 October 2023
8 and, excluding the exhibits index, it's 44 pages
9 in length.
10 **A.** Yes, that's correct.
11 **Q.** Is that your signature on page 44?
12 **A.** It is, yes.
13 **Q.** Are the contents of that witness statement true
14 to the best of your knowledge and belief?
15 **A.** Yes.
16 **Q.** Thank you. Now, a copy of that is going to be
17 uploaded to the Inquiry's website. I'm not
18 going to ask you questions about every part of
19 it, just selected elements of it. You're here
20 today to assist us with the issues arising in
21 Phase 4 of the Inquiry, which is the
22 investigation and prosecution of subpostmasters
23 for criminal offences.
24 Can I start, please, with your career.
25 I think you worked for the Post Office for

2

1 **A.** Yeah, I think it was the back end of 1999, yes.
2 **Q.** We're going to come back to that in a moment
3 because the work that you did there may be of
4 relevance to the Inquiry.
5 That lasted until 2000; is that right?
6 **A.** It lasted until the end of December 2000, yes.
7 It was a few months, yeah.
8 **Q.** So a year or so?
9 **A.** No, it was during 1999, about midway or a bit
10 further, and I finished that role at the end of
11 December '99.
12 **Q.** Oh, it was just in 1999, was it?
13 **A.** Yes.
14 **Q.** Right, okay. So about six months, then?
15 **A.** May have been less than that but, roughly, it
16 was a few months.
17 **Q.** In your statement you say in 2000 you started
18 work as an Investigation Manager based in
19 Twickenham; is that right?
20 **A.** Yes.
21 **Q.** As an Investigation Manager, were you managing
22 investigations or managing people?
23 **A.** Investigations.
24 **Q.** Okay. Did you manage any people?
25 **A.** No.

4

1 Q. Okay. You moved, I think, from Twickenham to
 2 Woking and in 2004 you were promoted to
 3 an Investigation Team Manager; is that right?
 4 A. That's correct.
 5 Q. Did that mean that you then started managing
 6 people as well as investigations?
 7 A. Yes.
 8 Q. How many people were in the team that you
 9 managed?
 10 A. It fluctuated but roughly between four up to
 11 eight people.
 12 Q. Did they all work in Woking too?
 13 A. No, they didn't. They were dispersed
 14 geographically.
 15 Q. Did they home work or did they have an office
 16 they could come into?
 17 A. Back then we had offices.
 18 Q. Right. How did you monitor or supervise these
 19 four to eight people?
 20 A. Did regular one-to-ones, I usually went to their
 21 office to conduct a one-to-one -- might have
 22 been every month or six weeks, or so -- and team
 23 meetings, we'd sort of have at my office. So
 24 I'd generally go to them but -- the
 25 one-to-ones -- for team meetings, they'd come

5

1 A. I think it went direct to the Casework Team and
 2 then up to the Criminal Law Team.
 3 Q. So it didn't have to come through you?
 4 A. I don't think it came through me but they would
 5 email me, for example, their reports, maybe.
 6 Q. Okay. So you would see something about the
 7 cases that were going off to the Criminal Law
 8 Team --
 9 A. Yes --
 10 Q. -- investigated by members of your team?
 11 A. Yes.
 12 Q. Would you conduct reviews of their files, the
 13 Investigation Managers?
 14 A. I didn't conduct reviews but I did read,
 15 obviously, some of the reports.
 16 Q. What would cause you to read the reports?
 17 A. Because I'm their manager, just to make sure
 18 there wasn't any horrendous errors or anything
 19 wrong.
 20 Q. So you'd have a good idea of the things that
 21 your team were investigating, the nature of the
 22 investigations that they were carrying out, and
 23 the conclusions that they reached in their
 24 investigation reports?
 25 A. Yes.

7

1 back to my office.
 2 Q. How frequently were the team meetings where
 3 everyone in the team came in?
 4 A. Ooh, probably every month or two.
 5 Q. Were they scheduled, "We're having a team
 6 meeting every month or two", or were they only
 7 when the occasion arose?
 8 A. They were scheduled. We'd have a meeting,
 9 I think, and at that meeting we'd pencil in the
 10 date for the next meeting.
 11 Q. Was there sort of a standing agenda for those?
 12 A. Some bits were standing agenda, like any new
 13 Post Office related products or transactions,
 14 et cetera, and also I used to print off
 15 everybody's current cases, and they could select
 16 a case or two if it was unusual and talk about
 17 it, and it was also used for, if somebody had
 18 an investigation and needed someone to help them
 19 on the day of when the operation concluded. You
 20 know, because we're all in the same room, we
 21 could sort those sort of things out.
 22 Q. When an Investigation Manager submitted a file
 23 for a decision on prosecution, did that have to
 24 come through you before it got to Legal Services
 25 or to somebody else?

6

1 Q. To whom did you report in this period? I'm
 2 talking about 2004 onwards when you were the
 3 Investigation Team Manager?
 4 A. When I was the Investigation Team Manager
 5 I reported initially to Manish Patel, who was
 6 the Senior Investigation Manager, and then
 7 I think after him it was Trevor Lockey. I think
 8 there were -- and then perhaps Dave Pardoe,
 9 after that.
 10 Q. Was there any one Senior Investigation Manager?
 11 A. I believe so, yes.
 12 Q. I think you stayed in that role until 2007; is
 13 that right?
 14 A. Yes.
 15 Q. In that year, 2007, and then 2008, you worked as
 16 a Casework Manager based in Croydon; is that
 17 right?
 18 A. It was, yes, for a number of months between '07
 19 and '08, yes.
 20 Q. What was the function of the Casework Team in
 21 Croydon?
 22 A. The function of the Casework Team was -- it was
 23 sort of split into two. On one side was
 24 banking, the Post Office Card Account. So there
 25 was an assistant manager and some admin staff

8

1 who primarily dealt with DPA requests from law
 2 enforcement in relation to the --
 3 **Q.** Data Protection Act requests?
 4 **A.** Yes. Then the other side was another assistant
 5 manager and admin staff, who dealt with
 6 investigations. So, as I mentioned earlier, the
 7 case file would come into the Casework Team,
 8 they'd complete a spreadsheet with, I don't
 9 know, date of interview, or date of summons, or
 10 anything relating to the case, and then they
 11 would send that up to the Criminal Law Team.
 12 **Q.** So what did they add, the Casework Team, what
 13 was their purpose, their function, if you like?
 14 The bit that -- not the banking side, the
 15 investigation side.
 16 **A.** Well, the investigation side, with the
 17 spreadsheet that we used, which was -- I can
 18 remember was horrendous, it was the movement of
 19 the case throughout its life-cycle and to ensure
 20 that it's dispatched to the relevant people and
 21 emails sent to relevant stakeholders. And so it
 22 was -- it was like the central admin for a case.
 23 **Q.** Was it only an administrative function or did it
 24 perform any tasks of substance in relation to
 25 the investigation?

9

1 **Q.** Was he based in the Croydon office?
 2 **A.** He wasn't, no. He was up in St Helens, I think
 3 he lived.
 4 **Q.** Did you have meetings with him, regular contact
 5 with him or, because of the geographical
 6 separation, not?
 7 **A.** I had contact with him. I don't recall it being
 8 regular.
 9 **Q.** Then, I think, later in 2008, you became a Fraud
 10 Risk Manager; is that right?
 11 **A.** Yes.
 12 **Q.** So that moved you out entirely of the Casework
 13 Team in Croydon; is that right?
 14 **A.** Yes.
 15 **Q.** That lasted until 2010?
 16 **A.** Yes.
 17 **Q.** What did that job entail: Fraud Risk Manager?
 18 **A.** It was primarily running fraud risk programmes,
 19 for example the fraud risk programme on Crown
 20 Office cash losses, scratchcards, Overnight Cash
 21 Holdings, Post Office Card Account, rejected
 22 postage labels. So I'd say 90-odd per cent of
 23 it was these particular products or transactions
 24 and we'd draft up a programme to address risks
 25 and weaknesses in those areas.

11

1 **A.** In relation to the investigation, possibly
 2 obtaining the audit requests from Fujitsu.
 3 **Q.** Anything else, other than that? We're going to
 4 come back to that because I think you'll realise
 5 that's quite a big topic for the Inquiry. So
 6 that function sat within the Casework Team in
 7 Croydon, obtaining audit data from Fujitsu?
 8 **A.** Yeah.
 9 **Q.** Anything else?
 10 **A.** I can't think of, at the moment, anything else.
 11 **Q.** How many people worked within the Casework Team
 12 on the investigation side of the house?
 13 **A.** There was two or three.
 14 **Q.** They were managed by one assistant manager; is
 15 that right?
 16 **A.** That would include the --
 17 **Q.** That would include the assistant manager?
 18 **A.** Yeah.
 19 **Q.** Did you sit underneath the assistant manager?
 20 **A.** I sat above the assistant manager.
 21 **Q.** Above, okay, and your title then was?
 22 **A.** Casework Manager.
 23 **Q.** Casework Manager, okay. At that time to whom
 24 did you report?
 25 **A.** I think it was Dave Pardoe, at that stage.

10

1 **Q.** By "programme", do you mean a computer program
 2 or a schedule of work?
 3 **A.** A schedule of work. It was the Crime Risk Team
 4 that was based within the Security Admin Team
 5 who identified these as more high-risk areas.
 6 **Q.** Then I think in 2010 you became an Accredited
 7 Financial Investigator; is that right?
 8 **A.** Yes, it took a while to get the accreditation
 9 but, yes.
 10 **Q.** You stayed in that job until 2014; is that
 11 right?
 12 **A.** Yes.
 13 **Q.** I think your accreditation was given by the
 14 NPIA, the National Police Improvement Agency; is
 15 that right?
 16 **A.** That's right, yes.
 17 **Q.** What was your role as an Accredited Financial
 18 Investigator?
 19 **A.** My role was basically to recover losses on
 20 behalf of the business.
 21 **Q.** So this is, essentially, proceeds of crime work;
 22 is that right?
 23 **A.** Yes, yes.
 24 **Q.** Was that all post-conviction work?
 25 **A.** Confiscation was post-conviction.

12

1 Pre-conviction would be things like restraint
 2 orders and production orders.
 3 **Q.** Whereabouts were you based when you were
 4 an Accredited Financial Investigator?
 5 **A.** That would have been in, I think, Old Street in
 6 London.
 7 **Q.** Then in 2014 and until 2015, you worked as
 8 a Security and Investigation Team Leader; is
 9 that right?
 10 **A.** Yes.
 11 **Q.** You retained your title as an Accredited
 12 Financial Investigator; is that right?
 13 **A.** That's right.
 14 **Q.** Did you do any financial investigation work?
 15 **A.** Yes, but it sloped off during that period.
 16 I mean, to be honest, I did many of the roles
 17 I'd previously done in that last year.
 18 **Q.** As a Security and Investigation Team leader,
 19 what was your function?
 20 **A.** Again, it was, as I described in 2004, manage
 21 a team of people but it also had a security
 22 element at that stage. So the team would deal
 23 with burglaries, robberies, cash centres,
 24 security visits, et cetera.
 25 **Q.** Then, finally, I think in 2015 until 2017, you

13

1 **Q.** Tell us what a Joint Business Testing Analyst in
 2 relation to Horizon did?
 3 **A.** Yeah. So I was based within ICL Pathway, as it
 4 was known then.
 5 **Q.** So you mean physically based?
 6 **A.** Yes, the Head Office is in Feltham, and they had
 7 quiet a large room called -- I think it was
 8 called the Rig and, within that room, were lots
 9 of computer terminals that reflected the names
 10 of post offices. And they chose football teams
 11 so you'd have Liverpool Post Office, which might
 12 be a single terminal; you could have Chelsea
 13 post office, which might have three terminals,
 14 a bigger, busy office that would represent.
 15 **Q.** A slightly better post office, presumably?
 16 **A.** Potentially. And my role, and a colleague who
 17 joined at the same time as me, we would
 18 basically get scripts and we would literally
 19 have to follow these scripts, so it would say go
 20 to Liverpool Post Office, log on, sell a first
 21 class stamp, take cash for it, and literally
 22 just follow a basic script like that.
 23 **Q.** So a rig was, it was a dummy system; is that
 24 right?
 25 **A.** Yes, yeah.

15

1 were a Branch Standards Manager?
 2 **A.** Branch Standards Field Manager, yes.
 3 **Q.** What did a Branch Standards Field Manager do?
 4 **A.** The main thrust of that role was to check that
 5 subpostmasters or staff were having the correct
 6 conversations with customers in relation to
 7 items they were posting over the counter. One
 8 of the focuses was whether items were prohibited
 9 or restricted and to make sure that they were
 10 asking the right questions.
 11 **Q.** Was there any investigation function within that
 12 role?
 13 **A.** No.
 14 **Q.** Can we go back, then, having looked briefly at
 15 each stage of your career in the Post Office, to
 16 the time that you were involved in 1999, and
 17 I think your statement says into 2000, as
 18 a Joint Business Testing Analyst for Horizon.
 19 Can you help us just again -- I think I missed
 20 it earlier -- how long you worked for as a joint
 21 business testing analyst for Horizon?
 22 **A.** If it was mid-1999, I definitely finished on --
 23 at the end of December that year. So I would
 24 say six months, maybe a month or two more or
 25 less.

14

1 **Q.** Was it self-contained, a closed system, or did
 2 it connect with the outside world?
 3 **A.** I don't think it connected with the outside
 4 world. That's basically what we did, follow
 5 these scripts and, when we'd finished, we'd hand
 6 the script over to -- I think it was the back
 7 office team. So I don't know whether the system
 8 communicated with them but that's what we did.
 9 It was just literally following these scripts.
 10 **Q.** Were you aware, in this time, as a testing
 11 analyst, of significant problems arising with
 12 the development and testing of the Horizon
 13 system?
 14 **A.** I can recall two things: number 1, the system
 15 was meant to have the Benefits Payments System
 16 attached to it, so to pay out pensions, and that
 17 was pulled, I think, during the time I was
 18 there, which was quite significant. I don't
 19 know the reasons why but the Government said
 20 we're not going to be going down that road.
 21 And the other noises, for want of a better
 22 word, I can remember, were people said that
 23 Horizon was chosen -- sorry, Fujitsu or ICL
 24 Pathway were chosen because it was the cheapest
 25 option. So I don't know which other companies

16

1 tendered for the system, but Fujitsu or
 2 ICL Pathway were chosen.

3 **Q.** What about problems at an operational level with
 4 the system? Were you aware of, in this testing
 5 phase, issues and problems with the operation of
 6 Horizon?

7 **A.** I was aware of issues whilst testing, because
 8 that's what you do in the testing environment.

9 **Q.** That was the purpose of it?

10 **A.** Yes. But, for example, you know, if the script
 11 said "Issue a motor vehicle licence" -- and this
 12 is just an example, not an actual example -- but
 13 you'd go to the screen and the motor vehicle
 14 licence wouldn't be there. So you'd have to
 15 annotate the script to say, "Can't perform this
 16 transaction because the icon is not there", and
 17 that would go to the back office team and
 18 I think they'd look at it and then rectify that
 19 issue.

20 The only problem I do remember was I think
 21 there was a Northern Ireland icon and --

22 **Q.** A Northern Ireland icon?

23 **A.** Yes. It was a picture of somebody with a green
 24 sweater and it was raised that perhaps this
 25 green sweater should be made purple because of

17

1 **Q.** Were you aware at this time of something called
 2 Als or Acceptance Incidents?

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

4 **Q.** Do you remember any of these testing issues
 5 affecting settling accounts or balancing?

6 **A.** No.

7 **Q.** Is that "It's 23 years ago now and, therefore,
 8 I can't remember one way or another what each of
 9 the issues were" or "I don't think any of them
 10 involved balancing issues"?

11 **A.** Again, I can't remember, specifically, 23 years
 12 ago but there may have been -- I mean, when
 13 I mentioned the scripts that we used, if it
 14 ended up with a cash account, for example, and
 15 before that, there were problems in finding
 16 icons and things, we may not have finished the
 17 script because we couldn't end up doing the cash
 18 account that would come out the way it should
 19 have done. But I can't remember.

20 **Q.** Can we just look at one example of maybe one of
 21 the things you were doing when you were a Joint
 22 Business Testing Analyst, by looking at
 23 FUJ00021692. Can you see this is a document
 24 called a PinICL; can you see that?

25 **A.** I can, yes.

19

1 political situation.

2 **Q.** Were you aware of what happened when a problem
 3 arose in testing? You wanted to issue a DVLA
 4 licence and the script told you to, and it --
 5 the system couldn't, and you put -- you handed
 6 in that script marked up in the way you've said
 7 saying, "Can't do that function". Were you
 8 aware of the next steps or were you a sort of
 9 a smallish cog in a larger set of machinery?

10 **A.** I was a smallish cog. That would be relayed
 11 back to the back office team and then, after
 12 that, I don't know. We would then get another
 13 script to work on.

14 **Q.** So you wouldn't see what the solution was to
 15 that problem or, indeed, whether there was
 16 a solution to it?

17 **A.** I wouldn't see it and, to be honest, I wouldn't
 18 understand anyway, even if I did see it.

19 **Q.** Why wouldn't you understand if you did see it?

20 **A.** Because that would be far too technical for me.

21 **Q.** I think it's right that you didn't have any
 22 qualifications or experience in computing?

23 **A.** No.

24 **Q.** Is that --

25 **A.** That's right, yeah.

18

1 **Q.** Do you remember PinICLs?

2 **A.** I can -- the word "PinICL" rings a bell but
 3 I can't remember it.

4 **Q.** You can't remember what their function was or
 5 who issued them or --

6 **A.** No.

7 **Q.** -- what their purpose was?

8 **A.** No.

9 **Q.** We can see that this one was opened on the
 10 2 June 1998 and the summary of it, to the left,
 11 is EPOSS, do you remember what EPOSS was?

12 **A.** Is that Electronic Point of Sale.

13 **Q.** Yes, and that was a problem. It says the
 14 transaction logs were not working with EPOSS?

15 **A.** Yeah.

16 **Q.** I take it you don't remember that as a problem?

17 **A.** I don't remember that as a problem and that was
 18 before I had that role anyway.

19 **Q.** That's what I wanted to ask you about, if I may.
 20 If we turn to page 5, please. Look at the
 21 bottom half of the page, thank you. Can you
 22 see, I think it's five lines in now, it says:
 23 "The 'BA/POCL Reports and Receipts' document
 24 reflects the system. It does not specify the
 25 requirement for transaction logs. The

20

1 requirement is to offer the same functionality
2 as the existing system. Two joint testers
3 (Chris Phillips and Dave Posnett) are currently
4 checking the transaction log functionality on
5 Horizon (a) against the documented functionality
6 of the existing system (b) for usability (which
7 is what this PinICL was originally raised for)."

8 So a number of questions arising from that.

9 Firstly, this PinICL was raised in June 1998 --

10 **A.** Yes.

11 **Q.** -- and this entry is in September 1998, and it
12 refers to you, along with Chris Phillips, as
13 a joint tester?

14 **A.** Yes.

15 **Q.** Do you think you were, in fact, doing the joint
16 testing or had the role as a joint tester
17 earlier than you thought?

18 **A.** If those dates are correct, then, yes. But I'm
19 sure it was 1999. But Chris Phillips was the
20 other guy who joined the same time as myself.
21 I thought it was a few months in '99 because
22 I can remember the Millennium Bug that everyone
23 thought all the computers in the world were
24 going to stop, so I didn't think it was 1998.
25 I may be wrong.

21

1 there between you about the issues or problems
2 with the system?

3 **A.** My recollection was, as I've outlined, we
4 followed the scripts and those scripts, whether
5 they'd worked out correctly or not, were passed
6 to the back office team for review and to
7 rectify anything, if anything needed rectifying.

8 **Q.** When you left this role, what was your view as
9 to the reliability and integrity of the data
10 that Horizon produced?

11 **A.** I don't recall having any concerns because,
12 although it was a new role for me, my
13 understanding was that the testing environment
14 was to test, test, test, identify issues and
15 then people with more technical knowledge would
16 rectify them. So I don't think I gave it any
17 I serious thought. I thought that was par for
18 the course for that particular role.

19 **Q.** What was the chat, the conversation, the feeling
20 amongst those with whom you were working, as to
21 the adequacy or otherwise of the Horizon system?
22 Was it seen as problematic or difficult? Were
23 people saying, "Look, there are lots of problems
24 with this, we've got a rollout coming around the
25 corner, a deadline to meet"?

23

1 **Q.** If this is accurate, and we've got no reason to
2 think that the dates on here are wrong, it looks
3 like in the autumn of '98 you were performing
4 the role of a joint tester?

5 **A.** Yeah.

6 **Q.** It refers to you checking the transaction log
7 functionality on Horizon. That sounds something
8 slightly different to running a script, seeing
9 whether a test rig could perform a function like
10 issue a DVLA licence; would you agree?

11 **A.** That element does sound different, yes.

12 **Q.** What you understand it is saying here or it is
13 recording you as doing: checking a transaction
14 log functionality?

15 **A.** It says that, yes.

16 **Q.** Yes, but what do you understand it to be
17 referring to?

18 **A.** That we were trying to obtain transaction logs
19 from the system within the rig.

20 **Q.** What do you understand transaction logs to be?

21 **A.** A record of all the transactions entered on the
22 terminal over a given time frame.

23 **Q.** Yes, thank you. That can come down, please.

24 How collaborative was the joint testing
25 team, ie how much exchange of information was

22

1 **A.** Yeah. I don't recall any conversations but I do
2 recall that the rig was down quite often. So,
3 for example, we'd have a script and we'd have to
4 go and do some work, but the technicians were
5 working on the rig. So, to be honest, there
6 were hours where we had to just get on with
7 other things whilst waiting to go in. So there
8 were problems but I wouldn't know what those
9 problems were because we were just told when we
10 could go in and start following the script
11 again.

12 **Q.** So what was your overall impression of Horizon
13 when you walked away from this job?

14 **A.** It was a new computer system for all post
15 offices. We'd mentioned EPOSS there. I think
16 it was also partly based on ECCO, which Crown
17 Offices had.

18 **Q.** Had been using for a while?

19 **A.** Yes.

20 **Q.** Was there anything in particular about EPOSS
21 that had raised concerns about the operation and
22 functionality of the EPOS System?

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

24 **Q.** Were you involved in any way in the training of
25 subpostmasters in the rollout of Horizon?

24

1 **A.** No.

2 **Q.** Did you have any function concerning the rollout
3 of Horizon?

4 **A.** No. When I finished that job, at the end of
5 2000, after Christmas, I then became
6 an Investigation Manager, or temporarily became
7 an Investigation Manager, until there was
8 interviews for the post on a permanent basis.

9 **Q.** Again, when you left, would you say that your
10 experience was that testing had revealed some
11 problems, no problems or significant problems
12 with the operation of Horizon?

13 **A.** I would personally say some to significant,
14 because I don't know what the norm would be, in
15 terms of errors on a computer system during
16 a testing phase.

17 **Q.** Can you remember delays to the programme of
18 rollout due to technical problems with Horizon?

19 **A.** No. All I can recall is I think it was meant to
20 be rolled out in 2000 and it was rolled out in
21 2000. If there were a month or three delays,
22 because I wasn't in that role then, I don't
23 know.

24 **Q.** Can we just look at something that you said
25 about this period of time years later, in 2015,

25

1 George Thompson mentioned the Rudkin case at the
2 Select Committee hearing. There are others and
3 I think (without mentioning names, details, etc)
4 we could be more on the front foot if these were
5 flagged to MPs, Second Sight, etc."

6 So Parliament is conducting an inquiry,
7 an investigation, the Post Office has given some
8 evidence already through Mr Thompson, and this
9 is, on the left-hand side, a submission to that
10 Parliamentary committee, and you've marked up
11 this draft submission.

12 Can we just look at page 5, please, on the
13 left-hand document, and have a look at training
14 at 2.1. Thank you.

15 The Post Office was proposing to tell the
16 Committee that it heard evidence on the training
17 available to subpostmasters at the time of
18 Horizon's introduction:

19 "This evidence focused on the back of
20 training materials provided to subpostmasters at
21 the relevant time", et cetera.

22 Then next paragraph:

23 "As presented to the Committee, one might be
24 left with the impression that the training and
25 support ended there. On the contrary, on the

27

1 by looking at two documents alongside each
2 other, if we may. Firstly, POL00063370 and,
3 secondly, POL00118547. Thank you.

4 We can see that this is, on the left-hand
5 side, a Post Office Limited submission to
6 a BIS -- Business Innovation and Skills --
7 committee inquiry into the Post Office Mediation
8 Scheme, which was conducting an investigation in
9 2015. That's the document on the left-hand
10 side.

11 **A.** Yeah.

12 **Q.** On the right-hand side, we can see an email from
13 you to Helen Dickinson and Rob King, saying:

14 "I've trawled through this and made some
15 comments (yellow and blue highlights). Not
16 many, though as a lot of it is technical or not
17 within my knowledge to comment further. Witness
18 statement associated to reflect Horizon
19 training."

20 You say:

21 "As an aside (and my personal view) I really
22 do think there are cases where Horizon is
23 clearly irrelevant. The subpostmaster admits
24 theft, says what he did with the money,
25 et cetera. No grounds to even cite Horizon.

26

1 introduction of Horizon, two different training
2 courses were then provided by ICL Pathway. The
3 first was for subpostmasters and the second was
4 for staff. This training was delivered prior to
5 the branch migrating to Horizon. All
6 subpostmasters left the course with a Horizon
7 User Guide and they were all also subsequently
8 provided with Quick Reference Guides."

9 Then I think the part that you added, this
10 would have been marked blue or yellow in the
11 original, was:

12 "It was also a pass/fail course (so if they
13 weren't up to scratch they weren't allowed to
14 work with Horizon, it wasn't a case of 'going
15 through the motions' -- see associated witness
16 statement which may provide more ammunition)."

17 Now, this you were writing in 2015, yes?

18 **A.** Yes.

19 **Q.** Yes? We've seen the email --

20 **A.** The email, yes.

21 **Q.** -- enclosing this document with these mark-ups
22 on it, yes?

23 **A.** Yes.

24 **Q.** What direct experience had you got of the
25 provision of training to subpostmasters?

28

- 1 **A.** Sorry, could you repeat that?
- 2 **Q.** Yes. What direct experience had you got of the
3 provision of training to subpostmasters at the
4 rollout stage?
- 5 **A.** None.
- 6 **Q.** But you're here providing "ammunition", it says,
7 or you say, to those that are compiling this
8 submission to Parliament. If you had no direct
9 experience of the provision of training to
10 subpostmasters, why were you providing the
11 ammunition?
- 12 **A.** Firstly, I don't remember or recall that
13 document. Secondly, I think, when we were
14 investigating cases, one of the things we got on
15 occasions were the training records and it would
16 have been from those we were informed that it
17 was a pass/fail course. So that's probably
18 where I took that from.
- 19 **Q.** So this addition that you're suggesting to the
20 submission to Parliament comes from your
21 knowledge, not from the period that I was
22 talking about as a tester in rollout, but later,
23 when you were an Investigator; is that right?
- 24 **A.** Yes.
- 25 **Q.** To what extent did you look into the adequacy of

29

- 1 **Q.** That wasn't the message that you were seeking to
2 convey here, though?
- 3 **A.** No, the message --
- 4 **Q.** You were providing ammo to beef up the Post
5 Office's case to Parliament?
- 6 **A.** Yeah, I don't remember this at all. What I was
7 doing -- I think that's factual. It was also
8 a pass or fail course, et cetera.
- 9 **Q.** But what it doesn't do is provide that more
10 nuanced position that you've just expressed,
11 namely "Look, when I was a counter clerk,
12 I spent two or three weeks being trained, and
13 that was reduced to a couple of days, and then
14 I think a day, and then even less"?
- 15 **A.** Yeah. Having said that, these people may
16 already have been subpostmasters and clerks, so
17 they would know how to work in a post office.
18 I think it was purely the Horizon training, not
19 the Full Monty of counter clerk work.
- 20 **Q.** By this time, 2015, I realise we're jumping
21 right ahead at the moment, were you asked to
22 positive views only when making comments on this
23 document that was to be submitted to Parliament?
- 24 **A.** I don't recall because I don't recall the
25 document.

31

- 1 training as an Investigator?
- 2 **A.** I think it was -- if we obtained the part the --
3 well, it would have to be a pass, otherwise it
4 wouldn't have been working in the Post Office
5 and, again, I can't remember, I don't know
6 whether it was simply a pass or whether there
7 was some text "Competent with this", "Okay with
8 that", or "Issues with this", et cetera. So it
9 gave picture of a subpostmaster or a clerk as to
10 how well they were coping with the system during
11 training.
- 12 **Q.** Did you investigate the quality of training?
- 13 **A.** No.
- 14 **Q.** Did you ever hear subpostmasters say that the
15 training that they received on Horizon was not
16 adequate or satisfactory?
- 17 **A.** I have heard that, whether it was my cases or --
18 I can't recollect specific examples but that
19 does ring a bell and, if I am honest, when
20 I trained can be a counter clerk, I think it was
21 something like two or three weeks in a classroom
22 and then two or three weeks with somebody sat
23 behind me watching everything I did, whereas
24 this is obviously a couple of days' or one day's
25 training.

30

- 1 **Q.** Would you naturally provide ammunition for the
2 Post Office's case when making comments?
- 3 **A.** I don't think so, no.
- 4 **Q.** You would express any negative views of Horizon,
5 the training of subpostmasters, the operation of
6 the system, the quality of investigations and
7 the like too, would you?
- 8 **A.** I'd like to have thought so, yes.
- 9 **Q.** Would Post Office Management, if we just go back
10 to the email -- Helen Dickinson, you'll see that
11 she was the Security Operation Team Leader
12 North, yes; do you remember her?
- 13 **A.** Yes.
- 14 **Q.** Would Post Office Management be receptive to bad
15 news stories about Horizon in an exercise like
16 this?
- 17 **A.** At the time -- I think my view at the time was,
18 if it was good news, it was good news; if it was
19 bad news, it was bad news. Again, I don't
20 recall it, but I'd like to think that I would
21 have told the truth, you know, whichever side
22 that fell on.
- 23 **Q.** You wouldn't have felt any inhibition in 2015 of
24 giving additions to this document that were
25 negative or uncomplimentary about Horizon?

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1 A. I wouldn't have an issue with that, although at
 2 the time the -- or the messages were that there
 3 is nothing wrong with the system. So whether
 4 that's reflected my mindset, but, you know, I'd
 5 like to think, if I saw something that wasn't
 6 right, I would say it.

7 Q. Okay. Well, we'll be coming back to this later.
 8 That can come down, both those documents can
 9 come down. Thank you.

10 You have told us already that you worked as
 11 an Investigation Manager between 2000 and 2004.
 12 Can we look, please, at POL00106867, please.
 13 Can we start with page 9, please. This is part
 14 of a long email chain, years later in 2010, and
 15 can you see that you're copied in on this email
 16 from Sue Lowther to a group of people.

17 A. Yes.

18 Q. Can you remember who Sue Lowther was?

19 A. I think she was the Head of Information
 20 Security.

21 Q. That's completely accurate, it fits with her
 22 signature block. If we just read the start of
 23 this chain, insofar as you were included within
 24 it.

25 "As was discussed on the conference call and
 33

1 interfaces between Horizon and POLFS and the
 2 process by which 'error notices' are generated.

3 "2. The identity of all the offices making
 4 allegations, together with a list of loss
 5 declarations from those offices.

6 "3. A report from Service Delivery of all
 7 the problems they have received through the Live
 8 Service Desk."

9 Then there is some attribution of actions,
 10 and then at the end:

11 "Once we have that information, I can then
 12 put together a plan of how we will examine the
 13 system 'integrity' of Horizon and the resource
 14 required to complete it."

15 Do you remember this proposal to undertake
 16 a due diligence exercise on the integrity of
 17 Horizon, the purpose of which was to confirm
 18 an existing belief in the robustness of the
 19 system?

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

21 Q. If we go forwards, please, to page 7, and scroll
 22 down, please. Just scroll down a little
 23 further, please. Mr Wilson, a lawyer -- do you
 24 remember him, Rob Wilson --

25 A. I do, yes.

35

1 taking into account Rob's comments, to confirm
 2 that what we are looking at is a 'general' due
 3 diligence exercise on the integrity of Horizon,
 4 to confirm our belief in the robustness of the
 5 system and thus rebut any challenges."

6 Do you remember this, early 2010?

7 A. I don't remember it, but this is an example, as
 8 I said, of the messages that there's nothing
 9 wrong with Horizon, and that's not having a go
 10 at Sue. I think she was in the same position as
 11 quite a few of us.

12 Q. Looking at the email there, do you think that
 13 you were part of that conference call?

14 A. Probably. I can't remember it.

15 Q. In any event, Ms Lowther continues:

16 "The Information Security Team have looked
 17 at the information that has been forwarded to
 18 them, re the above and it seems that the issues
 19 raised are mainly around procedural items and
 20 about 'Accounting' reconciliation.

21 "To enable us to examine the integrity of
 22 Horizon from an Information Security perspective
 23 we need input from a number of areas.

24 "1. A description of the accounting process
 25 from the business perspective, including the
 34

1 Q. -- says:

2 "I note that you wish to examine the
 3 integrity of Horizon from an information
 4 security perspective."

5 Then just on to page 9:

6 "What does this mean?"

7 Yes?

8 A. Yes.

9 Q. Then back to page 7, please. Middle of the
 10 page. Ms Lowther:

11 "Essentially it means we would wish to
 12 examine the Security controls that we have
 13 specified for Horizon and those systems with
 14 which it interfaces are indeed in place and
 15 working correctly."

16 Then top of the page, please. Mr Wilson
 17 says:

18 "We have additional difficulties in relation
 19 to challenges to Horizon. Today I have been
 20 made aware of a prosecution being conducted by
 21 the CPS where Horizon is being challenged. The
 22 case may have been already identified by you.
 23 The difficulty, however, will be our lack of
 24 control over any case that is not being
 25 prosecuted by my team."

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1 Just stopping there, before we get to the
2 questions that arise at the end of this chain,
3 in what circumstances were cases prosecuted by
4 the CPS?
5 **A.** I think they were few and far between but it may
6 be, for example, a subpostmaster, a member of
7 staff was dealing from him and, if they went
8 directly to the police, they may investigate it
9 and they may wish to have the transaction event
10 logs or some other Fujitsu documents to examine.
11 **Q.** The view that Mr Wilson expresses here, was that
12 one that was circulating within the
13 investigation community, namely that, when the
14 CPS are the prosecutors and the police the
15 investigators, there is a lack of control by the
16 Post Office over what happens within the case?
17 **A.** I don't recall it being a -- I mean, I don't
18 recall this anyway but I don't recall it being
19 communicated to others.
20 **Q.** Can you recall it being a problem or being seen
21 as a problem that --
22 **A.** I don't recall it but I can understand what he's
23 saying that, yes, if it's not being dealt with
24 by his team, it's obviously not as good as if it
25 were being dealt with by their team.

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1 problems or issues with Horizon, then they
2 wouldn't know to pursue that and disclose
3 anything. If that makes sense.
4 **Q.** Isn't what Mr Wilson saying to you and the
5 others here, that, "Look, we're planning to
6 potentially investigate Horizon integrity. We
7 might have to disclose that to the police and
8 the CPS in independently investigated and
9 prosecuted cases, we will lose control over that
10 information"?
11 **A.** Yes.
12 **Q.** "Whereas, if it stays within the post office
13 Investigation Team, we retain control over that
14 information"?
15 **A.** Yes.
16 **Q.** Can we go, please, to page 1. I should have
17 said at the bottom of the page, please.
18 You say, in relation to this chain:
19 "Can we please ensure that Rob Wilson ... is
20 kept apprised of the situation ..."
21 If we just read on to page 3.
22 "... and included in any further
23 meetings/updates on this subject. Our
24 prosecution cases have faced an increase in
25 challenges as well as our civil cases, so the

39

1 **Q.** I think that's a matter of debate but here he's
2 talking about control over a case. What would
3 you understand the reference to "control" to be,
4 in the context of a debate over a challenge to
5 Horizon?
6 **A.** My view on this is that the Legal Services or
7 Criminal Law Team by and large would have
8 oversight over all cases. So, I mean, they
9 could see patterns or problems, et cetera. If
10 it was being -- a case that was being dealt with
11 by the police or another law enforcement agency,
12 they wouldn't have sight of the potential
13 problems or issues.
14 **Q.** That's one aspect of control, namely sight,
15 potentially. But wouldn't you understand
16 control also to mean control over what is
17 disclosed and what is not disclosed?
18 **A.** I don't read it like that. The difficulty,
19 however, will be our lack of control, if the
20 control is about disclosure, then I would
21 imagine it's up to the police or other law
22 enforcement agency, who is investigating the
23 case, to deal with the disclosure.

24 However, having said that, yes, I accept
25 that, if the police were unaware of potential

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1 activities outlined below and indeed going
2 forward, are applicable to both legal teams."
3 So you wanted Mr Wilson cited on this idea
4 of a review, a due diligence exercise on
5 Horizon?
6 **A.** Yes.
7 **Q.** Can we see what he replied to you, please.
8 Page 1, he says:
9 "If it is thought there is a difficulty with
10 Horizon then clearly the action set out in your
11 memo is not only needed but imperative. The
12 consequence however will be that to commence or
13 continue to proceed with any criminal
14 proceedings will be inappropriate. My
15 understanding is that the integrity of Horizon
16 data is sound and it is as a result of this that
17 persistent challenges that have been made in
18 court have always failed. These challenges are
19 not new and have been with us since the
20 inception of Horizon as it has always been the
21 only way that defendants are left to challenge
22 our evidence when they have stolen money or
23 where they need to show that our figures are not
24 correct."

25 By 2010, March 2010, does what Mr Wilson

40

1 says in that paragraph reflect the view that you
 2 would have held?
 3 **A.** So he says it's imperative that he's kept
 4 informed. I agree, and that's why I asked
 5 everyone to make sure that he's kept in the loop
 6 because I noted he wasn't copied in on some of
 7 the preceding emails.
 8 **Q.** Well, let's take it in stages after, then. The
 9 third line, he says his understanding is that
 10 the integrity of Horizon data is sound.
 11 **A.** Yes.
 12 **Q.** Did that represent your view by 2010?
 13 **A.** Yes, so it's another example, as I mentioned
 14 earlier, about messaging -- we had Sue Lowther
 15 saying that the system is fine, here's Rob
 16 Wilson saying his understanding is it's fine,
 17 and the message from the top was similar. So
 18 ...
 19 **Q.** Who consisted of the top?
 20 **A.** Well, I've heard things and seen things that
 21 about this Inquiry that allegedly people much
 22 higher up the chain knew things or were told
 23 there are problems or there might be problems.
 24 I don't know the ins and outs or who those
 25 individuals are. I can't remember any

41

1 let's say there's been three, six, 12 or 20
 2 challenges, and they've been unsuccessful,
 3 I think that would have, rightly or wrongly,
 4 cemented my view that the system was okay.
 5 **Q.** Would it be your understanding that, in all of
 6 those cases where the challenges had failed,
 7 full disclosure had been given of any system
 8 problems with Horizon, ie so that there was
 9 a fair hearing that had resulted in a dismissal
 10 to the challenge to Horizon?
 11 **A.** My view back then or now?
 12 **Q.** Back then?
 13 **A.** Back then, I would have thought everything was
 14 done as it should have been.
 15 **Q.** Had you heard of a case concerning the Cleveleys
 16 sub post office involving Mrs Wolstenholme?
 17 **A.** I've heard the name Cleveleys but I don't think
 18 anything about it.
 19 **Q.** Would you have known about it by then, by 2010,
 20 or is it something you've heard in the Inquiry?
 21 **A.** I don't know where I've heard of it but I've
 22 heard of the post office.
 23 **Q.** Had you heard about subpostmasters being
 24 acquitted when they had raised a challenge to
 25 Horizon?

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1 particular messages coming down but what I can
 2 recall is that there was certainly no messages
 3 coming up saying, "Stop investigating" or "Stop
 4 prosecuting".
 5 **Q.** So just breaking down what you said there, you
 6 can't recall any messages coming from the top of
 7 the organisation at Executive Team level or
 8 similar, that filtered their way down to you
 9 that there was nothing wrong with Horizon?
 10 **A.** I can't recall specific messages, no, but that
 11 was my understanding and, likewise, we've got
 12 Rob Wilson here, his understanding is that it's
 13 fine; sue Lowther, her understanding was that
 14 it's fine. So, at my level and their level
 15 higher up, I think the impression was that we've
 16 been told that the system is fine or it's
 17 working all the time correctly.
 18 **Q.** Moving on:
 19 "It is as a result of this that persistent
 20 challenges that have been made in court have
 21 always failed."
 22 Would that have been your understanding by
 23 2010?
 24 **A.** Yes, insofar as I don't recall any challenges
 25 being successful. So, if that was the case,

42

1 **A.** Not that I recall, but maybe in -- well, no,
 2 I don't recall.
 3 **Q.** Your view, come 2010, would have been that the
 4 persistent challenges had always failed?
 5 **A.** Yes, I can't remember any challenges that were
 6 successful. There may have been some but
 7 I can't remember.
 8 **Q.** Mr Wilson says:
 9 "These challenges are not new and have been
 10 with us since the inception of Horizon."
 11 Were you aware that the Post Office had
 12 received complaints concerning the integrity of
 13 Horizon data and challenges to Horizon data
 14 since the system's very inception.
 15 **A.** No. I don't recall that and, as we've
 16 discussed, I was an Investigation Manager from
 17 2000 to 2004. So I would only have had my
 18 cases, whereas the Legal Services team would
 19 have had oversight of all the cases across the
 20 country coming into them. So they may have been
 21 aware that there were issues at the beginning
 22 but I don't recall that.
 23 **Q.** During your tenure as the Investigation Manager,
 24 which included part of the national rollout
 25 period, what was the message coming down from

44

1 above as to Horizon integrity?

2 **A.** Back then I don't recall any mention of Horizon
3 integrity. I think it was more in later years
4 that it was mentioned.

5 **Q.** Were you, as an Investigation Manager, given
6 training in relation to the way that Horizon
7 operated and was relevant to your job as
8 an Investigator?

9 **A.** I would say yes but I can't remember any
10 training that was given.

11 **Q.** I'm talking about bespoke training in relation
12 to Horizon as an Investigator?

13 **A.** Again, I would say yes but I can't remember the
14 training.

15 **Q.** How did Investigation Managers understand the
16 data, the varieties of data, that were available
17 for them from Horizon?

18 **A.** I don't know how they were made aware. All
19 I can remember is transaction and event logs,
20 and how to get them off the system.

21 **Q.** Were there written instructions issued to
22 Investigators saying, "A key source of our
23 evidence after, say, 2000, is going to be the
24 Horizon system. It's new, we haven't got any
25 policy or procedure that relates to getting

45

1 allocated a case to me.

2 **Q.** You tell us in your witness statement -- there's
3 no need to turn it up, it's paragraph 43 -- in
4 relation to deciding whether and in what
5 circumstances to investigate:

6 "... the decision was informed by a number
7 of factors, including the shortfall and the
8 current resource and workloads within the
9 teams."

10 Is that correct?

11 **A.** Yeah.

12 **Q.** So, leaving aside for the moment, the amount of
13 the alleged shortfall and focusing on the
14 current workloads within the team, do you mean
15 by that that the workload of the Criminal
16 Investigation and Debt Recovery Teams played
17 a part in deciding whether an alleged shortfall
18 would be pursued as a crime or as a debt?

19 **A.** The Investigation Team, yes, we had nothing to
20 do with the Debt Recovery Team. If I could just
21 give you an example. Over the -- I think when
22 I started there was about 60 Investigators and
23 something like nine or ten teams and, over the
24 years, that went down to two or three teams and
25 about 20 Investigators.

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1 evidence from this thing. This is a menu of the
2 data that's available. This is what it shows,
3 or this is what it might show, such data. It
4 might help you to prove A or disprove B. These
5 are the people that you can get it from"?

6 **A.** I do recall something like that. But, again,
7 I can't remember it, but it was very more
8 simplified. It was how to obtain a transaction
9 log, do A, B, C; how to obtain an event log, do
10 X, Y, Z, and so on. I think it was a one sheet
11 of paper.

12 **Q.** Was that a within-your-team document or was it
13 something that applicable country-wide?

14 **A.** I can't remember and I don't know whether it was
15 drafted by someone in our team or one of the
16 Crime Risk Team, or even borrowed from the Audit
17 Team, I don't know.

18 **Q.** When you were acting as an Investigation
19 Manager, what determined whether you would
20 investigate or not? What were the relevant
21 considerations?

22 **A.** For an investigation?

23 **Q.** Yes.

24 **A.** Well, as an Investigation Manager, it would be
25 whether my Investigation Team Manager had

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1 So, as the staff reduced, the workload
2 didn't reduce as much, probably like most
3 businesses, and there came a time where, you
4 know, Investigators were swamped with work.
5 So --

6 **Q.** Did that affect the quality of the investigation
7 that they were able to carry out?

8 **A.** It would have done if they'd retained that work.
9 But I do remember we had to be quite hard and
10 say "Right well, we're not investigating this,
11 that or the other".

12 **Q.** What was the "this, that or the other" that you
13 wouldn't investigate?

14 **A.** Lower value audit shortages, pension allowance
15 overclaims that were of a certain amount.

16 **Q.** On alleged shortfalls, what, if any, was the
17 limit or the floor beneath which you wouldn't go
18 in an investigation?

19 **A.** I can't remember a particular figure. But I do
20 remember -- I think I put it in my statement --
21 about triggers and timescales.

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

23 **A.** Triggers and timescales.

24 **Q.** Yes. Can you now remember what the triggers
25 were?

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- 1 **A.** I can't remember now no but they fluctuated and,
 2 even when we were agreed on a trigger, if some
 3 has gone long-term sick and someone has left,
 4 then, again, that still wouldn't be set in stone
 5 as for us to investigate.
- 6 **Q.** Notwithstanding the use of these triggers, did
 7 it nonetheless remain the case that teams had
 8 an overstretched capacity to investigate?
- 9 **A.** At times, yes. When I mentioned we had about
 10 90/60 Investigators back then, I think, probably
 11 like other law enforcement agencies, we would
 12 investigate anything and everything that came
 13 our way. As time went on, staff became less, so
 14 you had to prioritise more what you actually
 15 investigated.
- 16 **Q.** Was there any drop in the extent and quality of
 17 the investigations that were conducted?
- 18 **A.** Not that I recall.
- 19 **Q.** So quality has always remained the same?
- 20 **A.** I believe so.
- 21 **Q.** It's right, isn't it, that you were set
 22 objectives to recover a certain amount,
 23 a certain percentage of fraud activity, weren't
 24 you?
- 25 **A.** Yes.

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- 1 **A.** Yes.
- 2 **Q.** -- ie the Post Office saying, "We're employing
 3 you to investigate, as a Financial Investigator,
 4 losses and seek to recover them"?
- 5 **A.** Yes.
- 6 **Q.** "We are making an investment. We want to see
 7 what the return is on our investment in
 8 employing you"?
- 9 **A.** Yes.
- 10 **Q.** Is that what that heading means?
- 11 **A.** I think so.
- 12 **Q.** I think it says that:
 13 "Evidence activity that produces recovery
 14 rates on inquiries closed of 65% or more
 15 (subject to quarterly review)."
 16 Can you tell us what that figure means, 65
 17 per cent or more, ie 65 per cent or more of
 18 what?
- 19 **A.** Right so 65 per cent or more on closed cases.
- 20 **Q.** But of what?
- 21 **A.** Well, if there's been ten cases in the year and
 22 all of them were £10,000 losses, the total is
 23 £100,000 of loss, so the recovery target would
 24 be 65,000.
- 25 **Q.** Okay, so it means that you have got to produce

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- 1 **Q.** Can we look, please, at POL00126734. These are
 2 your objectives, your personal objectives, for
 3 the year April 2012 to March 2013. Was this
 4 a feature of all of your time as an Investigator
 5 and at this time in Fraud Recovery?
- 6 **A.** So every year we had objectives. I'm not sure
 7 when I was an Investigator we had a target for
 8 recoveries.
- 9 **Q.** At this time that we're looking, April 2012,
 10 March 2013, you're an Accredited Financial
 11 Investigator?
- 12 **A.** Yes.
- 13 **Q.** Are you saying that you don't remember targets
 14 for recovery in the earlier period that I was
 15 looking at, 2000 to 2004, when you were
 16 an Investigation Managers?
- 17 **A.** That's correct. I think the recovery was
 18 important, but I don't remember it being
 19 an actual objective like it is here in later
 20 years.
- 21 **Q.** If we just scroll down and look at box 3,
 22 please. Under the heading "Fraud activity
 23 return on investment", and "Fraud activity
 24 return on investment", "investment" means
 25 investment in you, does it --

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- 1 evidence that shows that, of the total amount of
 2 shortfalls for that year, ie the alleged
 3 losses --
- 4 **A.** Yeah.
- 5 **Q.** -- you have recovered 65 per cent of those?
- 6 **A.** Yes.
- 7 **Q.** It doesn't mean in 65 per cent of cases and it
 8 doesn't mean 65 per cent of cases there must be
 9 some recovery; it's by reference to the total
 10 figure?
- 11 **A.** Yes.
- 12 **Q.** Can we see similarly for the next year
 13 POL00126836. These are your objectives for
 14 April 2013 to March 2014, "Fraud activity return
 15 on investment":
 16 "Evidence activity that produces recovery
 17 rates on closed enquiries of 65% or more."
 18 So the same?
- 19 **A.** Yeah.
- 20 **Q.** Do you know why one of your performance
 21 objectives was the recovery of such a number of
 22 the alleged shortfalls?
- 23 **A.** The particular number, I don't know why it's
 24 65 per cent, but I can understand, if you're
 25 an Accredited Financial Investigator, your job

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1 is to get money back for the business.

2 **Q.** Was that a consistent theme throughout your time
3 as an Investigator and then as an AFI?

4 **A.** As an AFI, yes. As an Investigator, I can't
5 remember but, you know, there was a recovery
6 element to the role.

7 **Q.** Can we look, please, at POL00126944.
8 Just pause there a moment. It looks like we
9 may have lost the connection with the Chairman.

10 **SIR WYN WILLIAMS:** Sorry, I was muted.
11 I was saying that there was a very small
12 period of time, no more than seconds, where
13 I think I lost connection but I've been
14 following all that's happened without a problem.

15 **MR BEER:** Okay, sir, we can't see you at the moment,
16 for some reason, which it's slightly
17 discombobulating to hear a voice without
18 a picture, because we don't know whether you're
19 here or not.

20 **SIR WYN WILLIAMS:** Well, I can assure when that I am
21 here but, obviously, it's necessary that I can
22 be seen.

23 **MR BEER:** Yes, you can now, sir.

24 **SIR WYN WILLIAMS:** Fine.

25 **MR BEER:** You're back in the room.

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1 **Q.** What were the consequences for you in missing
2 targets?

3 **A.** The potential consequences were -- I don't want
4 to go into too much detail but, on our PDRs you
5 got a score of 5, which was excellent; 4 was
6 very good; 3 was good; 2 was improvements
7 required; and 1 was poor. So, if you didn't hit
8 the targets, it might have gone from good to
9 improvement required.

10 So it affected your PDR score, which in turn
11 would affect your bonus that you got as well.

12 **Q.** I was about to ask: was the achievement of the
13 target in getting money in from subpostmasters
14 linked to remuneration? The answer is yes.

15 **A.** It was linked to remuneration for me and others.
16 But, as I say, let's say that was 50 per cent,
17 I could demonstrate well, you know, you couldn't
18 get money in these cases because there weren't
19 any, so I would have argued the toss if I hadn't
20 hit the required target.

21 **Q.** Were all Financial Investigators on a bonus
22 scheme in the link to the recovery of money from
23 subpostmasters?

24 **A.** Yes, and everyone within the Security Team was
25 on a bonus, depending on their own objectives.

55

1 Can we look, please, at this document which
2 looks like the outcome of a performance review
3 against the objectives that we've just looked
4 at. It's for the period April to October 2013;
5 can you see that?

6 **A.** Yes.

7 **Q.** If we just scroll down on the one we're looking
8 at, the ROI, return on investment, it says:
9 "72% recovery rate against closed cases
10 across the team."
11 So you exceeded the 65 per cent target and
12 then you set out the things that you did in
13 order to do that, essentially, yes?

14 **A.** Yes.

15 **Q.** Did these recovery targets, getting in money,
16 impinge on the way that you and your team went
17 about its work in relation to subpostmasters?

18 **A.** Not that I remember, no.

19 **Q.** "We've got to get the money in, there's an
20 objective"?

21 **A.** Well, we've got to get the money in is the
22 objective but, if there is no money --
23 I wouldn't say it's the luck of the draw but in
24 some cases there isn't any money, in some cases
25 there is.

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1 **Q.** What were the other bonus metrics for other
2 members of the Security Team?

3 **A.** I don't know. I mean, a Crime Risk Analyst,
4 their day job is more analytics and --

5 **Q.** What about a straight Investigator?

6 **A.** The Investigator, as I say, I can't recall.
7 When I was an investigator, there was a specific
8 target and I can't -- I mean, I can't remember
9 what, if any, target they had in later years.

10 **Q.** Here you are telling a manager, presumably, in
11 this sentence, the second sentence:
12 "I have continued to secure impressive
13 recoveries."
14 Something in order to justify your bonus?

15 **A.** Indeed.

16 **Q.** At this time, and we're here late 2013, had you
17 any knowledge at all of any Horizon integrity
18 issues?

19 **A.** Not specifically, just -- well, if I could call
20 it noise.

21 **Q.** So "noise", in my mind, means something that's
22 going on in the background that's a bit annoying
23 and something you'd rather not pay attention to;
24 is that how you're referring to noise?

25 **A.** No.

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1 Q. What do you mean by Horizon integrity issues
2 were just noise?
3 A. What I mean is -- I mean, I can't be specific in
4 terms of which years but there would be some
5 noise, ie people citing Horizon. As the years
6 went on, there may have been more offices or
7 people citing Horizon. It's a bit of like
8 a snowball effect, it sort of gathers momentum,
9 as the years go on.
10 Q. Is that how you viewed it, that it was just
11 momentum gathering --
12 A. Um --
13 Q. -- rather than potentially the true picture
14 emerging, having been either not investigated or
15 suppressed for a period of time?
16 A. Yeah, again, I'll be honest, I viewed it as, as
17 you've outlined at the time.
18 Q. So it's something that was just gathering
19 momentum because it was being mentioned in the
20 press --
21 A. Yes.
22 Q. -- and amongst the subpostmaster community?
23 A. Yes, and myself and, as we've mentioned, Rob
24 Wilson, Sue Lowther and others, didn't know or
25 believe there was a problem, or issue --

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1 that I thought there was anything systemically
2 wrong with Horizon and that seems to have been
3 backed up by witness statements obtained by
4 Fujitsu.
5 Q. Presumably linking bonuses to the amount of
6 money that you recovered from subpostmasters was
7 intended to affect your behaviour?
8 A. Yes, but when you say that, it affected my
9 behaviour, insofar as I would do what I could
10 within the realms of the Proceeds of Crime Act.
11 Q. How did it affect your behaviour, knowing that
12 you were on a bonus if you got more money in?
13 A. Well, even putting that aside, that was my job
14 to get money back. And I utilised primarily
15 confiscation orders, which was within the realms
16 of the Proceeds of Crime Act and only following
17 a conviction. So I utilised the powers in the
18 appropriate way.
19 Q. That can come down. Thank you.
20 In your witness statement -- no need to turn
21 it up, it's paragraphs 19 and 20 -- you refer to
22 your role in relation to case strategies.
23 A. Right.
24 Q. In paragraph 25, you refer to involvement in the
25 development or management of policies. Who was

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1 Q. No, more than that. They're saying that there
2 isn't.
3 A. Yes, indeed.
4 Q. Did you ever know what their view was based on?
5 A. No. But I presume it's the same as mine: that
6 the business were constantly saying "There's
7 nothing wrong with it, there's nothing wrong
8 with it", which I always found a bit strange
9 myself.
10 Q. Why did you find it strange?
11 A. Because my view is that every computer system
12 has problems or glitches. So I think it was too
13 strong to say "There is nothing wrong with it
14 and it's working at all times". I mean, I'm
15 sure we've all been in a supermarket, half price
16 item, you get to the till and it comes up as
17 full price. I'm sure we've all been on our PCs
18 and some message comes up saying "You can't
19 access this, you haven't got the rights", yet
20 I've not even wanted to access it. On a grander
21 scale, you've got air traffic control across the
22 world.
23 So every computer system, in my view, does
24 have issues with it. So, I think, perhaps I was
25 sort of quite strong there but that doesn't mean

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1 responsible for criminal litigation strategy at
2 the Post Office?
3 A. I think it was the Head of Security and the
4 Senior Security Manager within that strand.
5 Q. Did you ever see criminal litigation strategy
6 described?
7 A. I may have seen a policy, like a prosecution
8 policy, if that was the same thing. I can
9 remember it but I don't know the details of it.
10 Q. Can you, in general terms, describe what the
11 Post Office criminal litigation strategy was,
12 say, between 2000 and 2004?
13 A. No.
14 Q. What about at a later stage when you were
15 an AFI?
16 A. I don't recall.
17 Q. How would you describe it now, looking back at
18 it?
19 A. One element or one focus is to recover monies
20 owed.
21 Q. Was that the principal purpose of the criminal
22 litigation strategy?
23 A. I'm not sure it was the principal reason.
24 Again, my recollection was that there was
25 a policy to prosecute, if it was in the public

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1 interest and, you know, whatever rules or
2 guidance that needed to be followed by primarily
3 the Criminal Law Team. The recoveries were
4 a significant part of that.

5 **Q.** Some organisations have or describe themselves
6 as having a robust Criminal Investigation and
7 Prosecution Policy. Some would say that they
8 have a weak or a tolerant criminal investigation
9 policy or strategy. Some might impose
10 thresholds for investigation and prosecution
11 that are exceedingly high, meaning that not much
12 gets investigated or prosecuted.

13 Where, in the spectrum, did the Post Office
14 sit, say, in 2000 to 2004, when you were
15 an Investigation Manager?

16 **A.** I don't know because I can't compare to those.
17 All I can say is recoveries were important and
18 they grew more important as time went on.

19 **Q.** Was it explained to you why recovery of money
20 was important, seen as important?

21 **A.** The only thing I can recall was that different
22 parts of the Post Office generated profits for
23 the business, whereas security investigations
24 were more of a cost. So in order to redress
25 that balance in some way, that's why recoveries

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1 page, please, to get a date, October 2002. So
2 this is whilst you would have been
3 an Investigation Manager; do you see that?

4 **A.** Yes.

5 **Q.** If we go to the top of the document, please.
6 It's a Casework Management policy for England
7 and Wales, part of "Investigation Policy":

8 "The aim of [the]; policy is to ensure
9 adequate controls are in place to maintain
10 standards throughout investigation processes."

11 Can we turn to page 2, please. Look at the
12 last bullet point that we can see currently, the
13 one beginning "The issue". Thank you. The
14 policy says:

15 "The issue of dealing with information
16 concerning procedural failures is a difficult
17 one. Some major procedural weaknesses, if they
18 became public knowledge, may have an adverse
19 affect on our business. They may assist others
20 to commit offences against our business,
21 undermine a prosecution case, bring our business
22 into disrepute or harm relations with major
23 customers. Unless the offender states that he
24 is aware that accounting weaknesses exist and
25 that he took advantage of them, it is important

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1 became more of a focus.

2 **Q.** So the recovery of debt, as you call it, from
3 subpostmasters was seen as a way of contributing
4 to the Post Office's bottom line?

5 **A.** Yes.

6 **MR BEER:** Thank you.

7 Sir, it's 12.30. I wonder whether that
8 would be an appropriate moment to break just for
9 half an hour until 1.00.

10 **SIR WYN WILLIAMS:** Yes, certainly.

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

12 (12.30 pm)

(A short break)

14 (1.00 pm)

15 **MR BEER:** Good afternoon, sir, can you see and hear
16 us.

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

18 **MR BEER:** Thank you.

19 Good afternoon, Mr Posnett, can we turn to
20 the issue of casework management and, in
21 particular, the extent to which Post Office
22 policies regulated the revelation of material
23 that showed a procedural weakness in Post Office
24 systems. Can we start by looking at
25 POL00104777. If we look at the foot of the

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1 not to volunteer that option to the offender
2 during interview. The usual duties of
3 disclosure under the Criminal Procedure and
4 Investigations Act 1996 still apply."

5 Is the approach that is set out there one
6 that you used when you were an Investigator?

7 **A.** I believe so, yes.

8 **Q.** You'll see it refers to "major procedural
9 weaknesses, may ... undermine a prosecution
10 case", if they became public knowledge --

11 **A.** Yes.

12 **Q.** -- and that unless the offender states they're
13 aware and took advantage of them, don't
14 volunteer them in interview. Is that the
15 approach that you took?

16 **A.** I don't recall that's the approach I took but,
17 if this was the policy at the time I was
18 an Investigator, I would have thought, by and
19 large, I would have adhered to that policy.

20 **Q.** Do you know why it was the Post Office's policy
21 not to reveal major procedural weaknesses to
22 people accused of crime?

23 **A.** Because, if word got out, others could commit
24 the same crime with those weaknesses still in
25 place.

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- 1 **Q.** What about if the weaknesses were not about
2 security or locks and barriers and screens and
3 cash in transit and safes, and things like that,
4 physical security issues, what about if they
5 were weaknesses in the accounting integrity of
6 the Horizon system?
- 7 **A.** I can recall that, on the discipline reports,
8 I would sometimes note weaknesses. In terms of
9 the Horizon accounting, I don't recall any of my
10 cases having that.
- 11 **Q.** So that issue didn't arise for you because you
12 believe there were no weaknesses in Horizon?
- 13 **A.** That's what I believe but I don't recollect any
14 of my cases where Horizon was cited anyway.
- 15 **Q.** Can we look, please, to the distinction between
16 the discipline report and the offender report,
17 by looking at a different policy, POL00118101.
18 You'll see this a guidance document or a guide
19 to the preparation of Red Label Case Files. Can
20 you just help us with what's a Red Label Case
21 was?
- 22 **A.** If a case was going to go up for legal advice,
23 there was a Red Label we used to put on the case
24 file that said, "Urgent today, must be
25 prioritised during the course of transit".

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- 1 security of the business. If you are in any
2 doubt as to the appropriateness of inclusion or
3 exclusion you must discuss with your team
4 leader."
- 5 Do you understand the distinction that's
6 being drawn there between a discipline report
7 and the offender report?
- 8 **A.** Yes.
- 9 **Q.** Do you understand that any failures that might
10 affect the likelihood of successful criminal
11 proceedings were not to be included in the
12 report disclosed to the offender?
- 13 **A.** Yes.
- 14 **Q.** Why was that?
- 15 **A.** I don't know but with -- this particular
16 document doesn't relate to when I was
17 an Investigation Manager. I think the previous
18 document you showed, POL00104777, was applicable
19 during the time frame that I was an Investigator
20 and, on that policy, I believe it says something
21 like weaknesses to be put on the report that
22 goes to Legal Services.
- 23 **Q.** That's the same as this: include weaknesses in
24 the confidential report --
- 25 **A.** Yes.

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- 1 **Q.** So it was a signal that it was going for legal
2 advice?
- 3 **A.** Yes.
- 4 **Q.** Thank you. Can we look, please, at page 10,
5 please, at the foot of the page. Can you see
6 paragraph 2.15, "Details of failures in security
7 supervision, procedures and product integrity":
8 "This must be a comprehensive list of all
9 failures in security, supervision, procedures
10 and product integrity [and] it must be
11 highlighted in bold in the report. Where the
12 investigator concludes that there are no
13 failures a statement to this effect should be
14 made and highlighted in bold."
- 15 Then over the page:
16 "Significant failures that may affect the
17 successful likelihood of any criminal action
18 and/or cause significant damage to the business
19 must be confined, solely, to the confidential
20 offender report. Care must be exercised when
21 including failures within the Discipline Report
22 as obviously this is disclosed to the suspect
23 offender and may have ramifications on both the
24 criminal elements of the enquiry, as well as
25 being potentially damaging to the reputation or

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- 1 **Q.** -- that goes to Legal Services; don't include
2 them in the one that goes to the suspect?
- 3 **A.** Yes, but on the one that would be more
4 applicable to me when I was an Investigator, I'm
5 sure it says in there somewhere the failings, it
6 would be up to Legal Services to decide whether
7 that should be disclosed.
- 8 **Q.** So do you know why, if a list or a narrative
9 description of failures that might affect the
10 successful likelihood of criminal action against
11 a suspect, were not to be disclosed to them in
12 a report which they would receive?
- 13 **A.** No, other than, as we've mentioned, if it's
14 a weakness in Post Office procedures or policies
15 and word got out, it could mean other people
16 could commit the same act. That's what
17 I understood that to be. I didn't understand it
18 to be "We need to keep this quiet because" --
19 you know, in terms of disclosure.
- 20 **Q.** Who was responsible for deciding what should be
21 disclosed and what should not be disclosed in
22 criminal proceedings?
- 23 **A.** Again, when I was an Investigation Manager,
24 there was a Royal Mail Group Policy and
25 Standards Team and all these things came out

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1 from them. As the years went by, Post Office
 2 became more independent and we had our own
 3 people drafting policies or reissuing policies.
 4 **Q.** Who, when you were an Investigation Manager
 5 between 2000 and 2004, in an investigation, was
 6 responsible for deciding what fell to be
 7 disclosed to a defendant?
 8 **A.** The Criminal Law Team.
 9 **Q.** Did the Investigator have any role?
 10 **A.** Yes, the Investigator would record all the
 11 information on the relevant schedules, unused
 12 material. Then it went to the Criminal Law Team
 13 and it was up to them to say yea or nay, or this
 14 should be on that form rather than that form.
 15 So, ultimately, they were responsible for
 16 disclosing to the defence that the Investigator
 17 recorded all the items that they had.
 18 **Q.** So it was a joint venture in which the
 19 Investigator was responsible for gathering the
 20 material together and scheduling it?
 21 **A.** Yes. The Investigator had to do their part and
 22 then, ultimately, it was the Criminal Law Team
 23 who decided what was --
 24 **Q.** Who decided on which schedule a document should
 25 appear or whether it should not appear on

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1 we can see that it came into force in August
 2 2013. Was there a policy like this beforehand,
 3 that you're aware of? Maybe you want to just
 4 flip through some of the pages to see what it
 5 looks like, its topics. If we scroll to --
 6 that's it, the table of contents.
 7 **A.** I think there possibly was but I don't recall.
 8 **Q.** Okay. Can we look, please, at page 16, right at
 9 the bottom, please, paragraph 5.11.6. This is
 10 dealing with interviews. The policy tells
 11 Investigators:
 12 "Should the recent Second Sight review be
 13 brought up by a suspect or his representative
 14 during a PACE interview the Security Manager
 15 should state: 'I will listen to any personal
 16 concerns or issues that you may have had with
 17 the Horizon system during the course of this
 18 interview'.
 19 Was that a policy that you're aware was
 20 followed, that a pre-prepared script, in
 21 accordance with that sentence there, was read
 22 out to suspects?
 23 **A.** I wouldn't be aware as to whether that occurred
 24 in every case of relevance. What date was this
 25 document?

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1 a schedule at all, and were responsible for
 2 giving physical disclosure of that to the
 3 defence; is that right?
 4 **A.** Pretty much, yeah. I mean, for example, I can
 5 remember one criticism I received. I can't
 6 remember the name of the lawyer but they --
 7 I remember them phoning me up, because I used to
 8 include post notes and bits of paper and all
 9 sorts on my unused material, and they said to me
 10 "Dave, it's only relevant material you need to
 11 disclose", and my view was "Well, who is to
 12 determine what's relevant and what's not?"
 13 So if the only criticism for me was to
 14 disclose too much, then I was happy to take that
 15 criticism. But that's what I mean about I would
 16 submit the forms and then Criminal Law Team
 17 would decide what gets disclosed.
 18 **Q.** Getting back to the report issue, do you
 19 understand why it was that significant failures
 20 that might cause damage to the business should
 21 not be included in a report that was disclosed
 22 to the offender?
 23 **A.** No, other than what I've said.
 24 **Q.** Can we move on to POL00031005. This is
 25 a Conduct of Criminal Investigations Policy and

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1 **Q.** August 2013.
 2 **A.** Right. So I think this may have been on the
 3 advice of Cartwright King, perhaps.
 4 **Q.** You picked up the role of an Investigation Team
 5 Leader in 2014 and in 2015, where I think this
 6 policy will still have been extant, and,
 7 plainly, the Second Sight review was something
 8 that suspects may raise. Would you agree?
 9 **A.** Yes.
 10 **Q.** Was voluntary disclosure given to a suspect of
 11 the Second Sight Report?
 12 **A.** I don't know.
 13 **Q.** Was there any sense in which the Post Office
 14 were seeking to shut down a suspect in interview
 15 by reading a pre-prepared line like this back to
 16 a suspect who raised the Second Sight Report?
 17 **A.** I don't know but, on reading that again, I don't
 18 think so because, if a suspect raises Second
 19 Sight, this is saying that I will listen to any
 20 personal concerns or issues that you may have
 21 had. It doesn't sound to me like it's shutting
 22 it down.
 23 **Q.** Okay, thank you. Can I move to the extent to
 24 which you understood the Horizon system could be
 25 afflicted by system integrity issues. You tell

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1 us in your witness statement that, when you were
 2 the Casework Manager at Croydon -- so I think
 3 we're talking between 2008 and 2010; is that
 4 right?
 5 **A.** I thought Casework Manager was 2007 and 2008
 6 but, yeah.
 7 **Q.** So I think 2004 to 2007, Investigation Team
 8 Manager; 2008 to 2010, Fraud Risk Manager, quite
 9 right.
 10 **A.** Yes.
 11 **Q.** In what job was one of your responsibilities --
 12 I'll ask it the other way round -- the obtaining
 13 of ARQ data?
 14 **A.** So that was -- Post Office Investigators would
 15 email in to the Casework Team a request for
 16 primarily transaction and event logs. Myself or
 17 one of the team would complete an ARQ form and
 18 send that to Fujitsu.
 19 **Q.** So this is when you were working as a Casework
 20 Manager at Croydon --
 21 **A.** Yes.
 22 **Q.** -- you had that responsibility for a couple of
 23 years?
 24 **A.** My recollection -- and bear in mind I seem to
 25 have got the date wrong on my testing analyst

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1 **A.** Not that I recall, no.
 2 **Q.** So you didn't know there was a difference
 3 between two species of ARQ data?
 4 **A.** I don't think so, I don't recall. What I do
 5 recall is whatever the Investigator wanted via
 6 the email they sent was what I would put in the
 7 ARQ request.
 8 **Q.** Did you get a handover from the person who was
 9 doing the job before you?
 10 **A.** Yes.
 11 **Q.** Did they explain to you that, "Look, there are
 12 different levels of ARQ data available"?
 13 **A.** Not that I recall.
 14 **Q.** You were the main point of contact between the
 15 two organisations, is this right, in relation to
 16 obtaining ARQ data?
 17 **A.** Anyone in the Casework Team could act in getting
 18 the data but I was the liaison point liaison in
 19 terms of the relationship between Post Office
 20 and Fujitsu.
 21 **Q.** So you knew how the system worked for getting
 22 data from Fujitsu?
 23 **A.** Yes.
 24 **Q.** You knew the forms that needed to be filled in,
 25 in order to get that data from Fujitsu?

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1 thing -- I thought I was a Casework Manager
 2 between '07 and '08, a number of months, so I'd
 3 say it was a few months between '07 and '08.
 4 **Q.** So you held a responsibility for a period of
 5 time as a Casework Manager for obtaining ARQ
 6 data from Fujitsu?
 7 **A.** Yes.
 8 **Q.** What training did you have to assist you to
 9 understand the nature of ARQ data before you
 10 took up that role?
 11 **A.** I don't recall any training in respect of that.
 12 **Q.** Did you have any training about the nature and
 13 extent of the data held by Fujitsu, which could
 14 potentially assist the Post Office in its
 15 investigations and prosecutions, before you took
 16 up the role?
 17 **A.** I don't recall.
 18 **Q.** When you carried out this work as the person
 19 responsible for obtaining the ARQ data from
 20 Fujitsu, did you understand the difference
 21 between what might be called standard ARQ data
 22 and enhanced ARQ data, the latter of which
 23 included data that could show where an action in
 24 the system had been generated by the system,
 25 rather than being generated at the counter?

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1 **A.** Yes.
 2 **Q.** Was the Post Office ever reluctant to request
 3 ARQ data from Fujitsu because it would incur
 4 cost?
 5 **A.** Yes.
 6 **Q.** Did you ever feel that commercial considerations
 7 overshadowed the desire to investigate
 8 shortfalls thoroughly and consistently?
 9 **A.** I don't recall making that link.
 10 **Q.** Was there a difference, from case to case, as to
 11 the extent of the ARQ data obtained?
 12 **A.** The extent, as in what --
 13 **Q.** The time period covered.
 14 **A.** Yes.
 15 **Q.** Was that sometimes based on cost?
 16 **A.** I would say yes.
 17 **Q.** We're going to get into the detail on this in
 18 a minute but can you give us your overall
 19 impression of how significant an issue this was?
 20 **A.** From recollection, I don't think it was
 21 a significant issue; I think there were a couple
 22 of occasions where the volume of information
 23 being requested seemed excessive. So, if the
 24 quota or, you know, the volume of requests per
 25 month was eaten into to an extent, it could have

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1 affected Investigators' requests, so that was
 2 a sort of juggling act.
 3 **Q.** Was some data not sought because of cost?
 4 **A.** In part, I would say, yes.
 5 **Q.** Can we just turn to -- a bit before we get into
 6 the detail of ARQ data -- a view expressed on
 7 Post Office's duties to verify through evidence
 8 the existence of a shortfall. Can we look at
 9 POL00140164. This is an exchange of emails
 10 concerned the Glenmoriston branch from November
 11 2014 and, if we can go to page 3, please -- and
 12 scroll down, please, and keep scrolling.
 13 It's an email exchange between you and
 14 Angela van den Bogerd and I needn't, I think,
 15 introduce the context for it but she says:
 16 "Dave,
 17 "Thanks for letting me have sight of this.
 18 I'd be interested to see the response we have
 19 sent to the letter as we need to ensure we are
 20 replying in a reasonable yet robust way."
 21 Then this:
 22 "The verification of stock and cash should
 23 be evidence enough that there is a shortfall and
 24 if we have evidence of falsification of accounts
 25 this will add further weight. We should be

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1 a shortfall.
 2 **Q.** Would it be sufficient evidence of a shortfall
 3 in the context of criminal proceedings?
 4 **A.** I don't know. There would be other parts or
 5 information relating to the case but then,
 6 ultimately, it's a decision for people higher
 7 up.
 8 **Q.** I don't think you're answering my question at
 9 the moment. Would it be your view that, in
 10 order to prove a loss in a shortfall case
 11 against a subpostmaster, it's sufficient just to
 12 show at audit there was a difference between
 13 what the system showed ought to be there in
 14 terms of cash and stock and what was there in
 15 cash and stock?
 16 **A.** I think when I was an Investigator, that was
 17 pretty much it.
 18 **Q.** Would that apply to the period of 2000 to 2004
 19 and when you came back to investigations later
 20 in your career?
 21 **A.** I didn't come back to being an Investigator.
 22 I don't think that changed. If a cash amount
 23 has been declared, which is different to the
 24 system, that was a big part. But it's possible
 25 that an error notice could come back to explain

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1 drawing our legal colleagues also [I think it
 2 should be 'drawing on our legal colleagues
 3 also'] as it is not for [the Post Office
 4 Limited] to demonstrate where the shortfalls
 5 have occurred just that they have."
 6 So this is a discussion about what evidence
 7 is needed to prove a shortfall. Can you see
 8 that Ms van den Bogerd says:
 9 "The verification of stock and cash should
 10 be evidence enough that there is a shortfall
 11 ..."
 12 Was that a commonly held view?
 13 **A.** I don't recall.
 14 **Q.** Is it a view that you would subscribe to, as
 15 an Investigator?
 16 **A.** As an Investigator:
 17 "The verification of stock and cash should
 18 be evidence enough that there is a shortfall
 19 ..."
 20 **Q.** Essentially she's saying, if, at audit,
 21 a shortfall is shown between what the system
 22 says should be there in terms of stock and cash
 23 and what is there in stock and cash, that's as
 24 far as the Post Office needs to go?
 25 **A.** Yes, that would have been evidence of

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1 the loss.
 2 **Q.** This is saying how far the Post Office needs to
 3 go or doesn't need to going proving its case:
 4 "All we need to show is the difference", as I've
 5 said, "between what the system shows and what's
 6 there on the ground, as displayed at audit"; was
 7 that a view, essentially, that was held
 8 commonly?
 9 **A.** I would think so but I can't recall.
 10 **Q.** Was it a view that you held: "I can prove
 11 a case, I can put a case before the criminal
 12 court, fit for the criminal courts to consider,
 13 of a subpostmaster stealing money if there's
 14 a difference between what the system says should
 15 be in his cash and stock and what's in his cash
 16 and stock"?
 17 **A.** When I was an Investigation Manager, yes, but
 18 there would be other things, as well, to
 19 consider.
 20 **Q.** Were the other things, as well, to consider
 21 necessary things to consider?
 22 **A.** Yes.
 23 **Q.** What were the other things that were necessary
 24 to prove a case?
 25 **A.** The points to prove on a particular offence.

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1 Q. What would be the points to prove on a theft
2 case?
3 A. A theft case would have been the dishonest
4 appropriation of property belonging to another
5 with the intention to permanently deprive.
6 Q. So that's the definition of theft?
7 A. Yes.
8 Q. How would that be translated into
9 a subpostmaster shortfall case? What evidence
10 would you need in order to prove those,
11 depending how you cut them, four or five
12 elements to of the offence of theft?
13 A. His responses or answers to relevant questions
14 put to him or her during interview.
15 Q. Is it would be necessary to have an admission
16 from him?
17 A. It would be necessary to tick off those points
18 to prove, yes.
19 Q. I don't understand what you mean, I'm afraid,
20 Mr Posnett. This email tends to suggest that
21 "We think we can get a case home to port by
22 showing a shortfall at audit".
23 A. Yes.
24 Q. I'm asking: is that your view?
25 A. I think that would have been my view at the time

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1 Q. Would you subscribe to the other parts of Ms van
2 den Bogerd's email, that, if there is any
3 evidence of falsification of accounts, that's
4 just additional weight, that's just what I've
5 called trimmings?
6 A. Yes.
7 Q. That's something nice to have but not necessary
8 to have?
9 A. Yes.
10 Q. Would you subscribe to the other part of her
11 email at the end there: it's not necessary for
12 the Post Office to demonstrate where the
13 shortfalls have occurred -- ie to prove on which
14 day, through which transaction or by which means
15 the shortfalls have occurred -- just that there
16 is a shortfall?
17 A. I would disagree with that now.
18 Q. Why would you disagree with that now?
19 A. Because of what we know now.
20 Q. You wouldn't have disagreed with at the time,
21 I take it?
22 A. I don't know.
23 Q. So we, Post Office, don't have to show, by
24 reference to records, that the subpostmaster
25 took the money out of the account by overstating

83

1 I was an Investigator --
2 Q. The other stuff is just trimmings; is that
3 right?
4 A. Well, I would say they were important but -- not
5 just trimmings, but, yes, I think when I was
6 an Investigation Manager, if the cash and stock
7 physically there was different to what had been
8 declared, that would have gone a long way to --
9 Q. Proving a case of theft?
10 A. Yes, but that wouldn't be us; that would be up
11 to the people above. And, also, it's if the
12 Auditors had contacted various people to get the
13 Investigation Team involved. So it's not just
14 there's a shortage, we're there, it has to go
15 through certain channels.
16 Q. That's the people who need to look at it and
17 investigate it from a matter of process?
18 A. Yes.
19 Q. I'm asking, from an evidential point of view,
20 and I think we've reached the position that you
21 say that it was your view when you were
22 an Investigator that shortfall at audit was
23 a sufficient basis to make an allegation of
24 crime and the crime being of theft?
25 A. Yes.

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1 the amount of stamps sold or undervaluing the
2 amount of cash received?
3 A. Yeah.
4 Q. All we have to do is show that, at cashing up,
5 at the audit, at the stocktake, there's
6 a difference between what Horizon shows should
7 be held and what is, in fact, held?
8 A. Yeah, I would say that's wrong.
9 Q. You would say that's wrong now.
10 A. Well, it was wrong at the time as well.
11 Q. Why was it wrong at the time?
12 A. Because it says it's not for POL to demonstrate
13 where the shortfalls have occurred, just that
14 they have.
15 Q. Just that they have.
16 A. So there could be a genuine error that could be
17 explained by an error notice that comes back.
18 Yeah.
19 Q. So how was it to be investigated how the
20 shortfalls have occurred? If it was wrong at
21 the time, what Ms van den Bogerd wrote, and
22 presumably wrong in 2000 and 2004 too, how did
23 the Post Office go about demonstrating where the
24 shortfall occurred?
25 A. Via interview.

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1 Q. That's asking the subpostmaster?
 2 A. Yeah.
 3 Q. What about by reference to any other evidential
 4 source?
 5 A. Like Horizon?
 6 Q. Yes. Was that done?
 7 A. I don't recall it being done in my cases but
 8 I am aware that Investigators did obtain
 9 transaction event logs.
 10 Q. Is that where the suspect raised an issue as to
 11 Horizon integrity?
 12 A. I believe so.
 13 Q. Was that seen as the touch point for whether
 14 Horizon needed to be investigated or
 15 interrogated or not, depending on whether the
 16 suspect raised an issue of Horizon integrity?
 17 A. I think transaction event logs were obtained by
 18 Investigators (1) to counter what may be claimed
 19 by a subpostmaster or counter clerk or (2) to
 20 back up the Investigator's view as to what's
 21 happened.
 22 Q. Do you remember that the standard request for
 23 ARQ data included, amongst the additional
 24 requirements that could be made, could be
 25 ticked, "confirmation that there are no reported

85

1 A. It may be required if a person was going to
 2 plead not guilty or to cover off any challenges
 3 that a person may make.
 4 Q. Does the opposite of that apply, that it wasn't
 5 required if it was thought the person was going
 6 to plead guilty?
 7 A. I don't recall but, yes, it could.
 8 Q. Why might that be? Why might a witness
 9 statement not be required if it was believed
 10 that the person might plead guilty?
 11 A. Well, I think if someone is going to plead
 12 guilty, then it would be a bit of a waste of
 13 time doing a witness statement because it won't
 14 be required.
 15 Q. What about giving them all of the evidence so
 16 they can judge whether to plead guilty or not?
 17 A. It would be relevant in that situation.
 18 Q. In any event, the form continues "Standard
 19 Format Requirements". Can you help us as to
 20 what that meant? Were they pre-printed, those
 21 standard format requirements?
 22 A. I don't recall but I would say yes.
 23 Q. It asks for:
 24 "A report of all transactions and events
 25 (including inactivity logout, log on/log off

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1 system matter of law functions during the date
 2 range period"?
 3 A. I don't recall that.
 4 Q. Can we look, please, at POL00051793. This is
 5 an ARQ request in Seema Misra's case, completed
 6 by you. Can you see that?
 7 A. I can, yes.
 8 Q. It's dated 9 June 2009 and is this in fairly
 9 standard format?
 10 A. I don't recall but yes.
 11 Q. You can see that it asks the question whether
 12 a witness statement is required, yes or no.
 13 What would determine whether a witness statement
 14 was required?
 15 A. If the Investigator has asked.
 16 Q. Yes, that's a bit circular. But why would
 17 an Investigator ask for a witness statement and
 18 why might an Investigator not ask for a witness
 19 statement when asking for ARQ data?
 20 A. I don't know. I mean, at this stage, if they're
 21 requesting data during an investigation, they
 22 wouldn't know at that stage whether a witness
 23 statement would be required, so I don't know --
 24 Q. Why might it be required in some cases and not
 25 in others?

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1 information) for the office including
 2 remittances received, transfers between stock
 3 units and error notices. Information to be
 4 provided in Excel 97 format with each category
 5 in a separate column."
 6 Then "Column headers as follows", then
 7 scroll down, please.
 8 Then "Additional Requirements", and you
 9 would mark this up "Yes" or "No"?
 10 A. I would say yes.
 11 Q. Yes, ie you would mark it up "Yes" or "No"?
 12 A. I think so, yes.
 13 Q. What would determine what information you asked
 14 for or didn't ask for?
 15 A. What the Investigation Manager is requesting on
 16 the email.
 17 Q. So there wasn't a form for the Investigator to
 18 fill in like this, was there?
 19 A. I don't believe so, no --
 20 Q. How -- sorry, I interrupted you.
 21 A. I don't think so because Fujitsu would only deal
 22 with the Casework Team. They shouldn't really
 23 have dealt directly with the Investigator.
 24 Q. So how would you decide what information to seek
 25 and not to seek?

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1 A. Purely based on what the Investigator is
 2 requesting.
 3 Q. In the second box down here, the words:
 4 "Please could you obtain a standard
 5 statement from Fujitsu that confirms the Horizon
 6 system for the above [Post Office] was
 7 functioning properly between 30 June 2005 [and]
 8 14 January 2008. The statement should state
 9 that they have reviewed and summarised all call
 10 logs during this period; however, these do not
 11 need to be produced."
 12 Just breaking that down, why was it
 13 necessary to obtain a statement that said the
 14 Horizon system was functioning properly?
 15 A. I don't know.
 16 Q. To what extent were the call logs seen as
 17 a measure of whether Horizon was functioning
 18 properly at a branch?
 19 A. I suppose the call logs may identify if
 20 a subpostmaster or clerk believed that the
 21 system wasn't functioning properly.
 22 Q. Did you understand whether any additional work
 23 was carried out by Fujitsu in the provision of
 24 a witness statement, which addressed anything
 25 other than the call logs?

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1 to be produced. Why did the call logs not need
 2 to be produced?
 3 A. I'm assuming that this is what the Investigator
 4 has requested.
 5 Q. Well, I think we may see that this is a standard
 6 form of request that's marked "Yes" or "No", and
 7 that the date range is altered depending on
 8 a range of factors?
 9 A. Yeah, I -- I mean, this part and the top part of
 10 the form, I mean, there's no way on earth I can
 11 imagine I've completed all these questions, so
 12 I think you're right, although I can't recall,
 13 that there's text already in these boxes and
 14 they may need to be tweaked to reflect
 15 a particular office or a particular time frame.
 16 Q. Why did you understand that it wasn't necessary
 17 for Fujitsu to produce to Post Office, the
 18 prosecutor, the call logs?
 19 A. I don't know.
 20 Q. They might contain weekly or monthly or
 21 sometimes, as we've seen, even daily complaints
 22 by a subpostmaster?
 23 A. Yes.
 24 Q. Aren't they relevant information?
 25 A. Yes, I guess so.

91

1 A. Not that I recall.
 2 Q. So you understood that the Fujitsu statement was
 3 based on and only based on an analysis of the
 4 call logs?
 5 A. Well, I don't know what they -- I mean, the bit
 6 here that the -- if the system was functioning
 7 properly, I don't know, only Fujitsu can answer
 8 that, but I don't think you should just look at
 9 the call logs to determine whether the system
 10 was working correctly.
 11 Q. Why should you not just look at the call logs to
 12 determine whether the system was working
 13 properly?
 14 A. Because the call logs can't definitively tell
 15 you whether the system was working correctly.
 16 Q. But, as a matter of fact, you don't know whether
 17 they looked beyond the call logs in the
 18 provision of this standard statement that says
 19 that it was functioning properly?
 20 A. Correct. I mean, I assume that they did look at
 21 the system because that was the key part of
 22 their witness statements, to confirm or not,
 23 although confirm mainly, that the system was
 24 working correctly.
 25 Q. The request says that the call logs do not need

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1 Q. So I just ask again: do you know why the Post
 2 Office was asking or saying that they needn't be
 3 produced?
 4 A. I don't know why.
 5 Q. Can we look, please, at FUJ00155830. You can
 6 see that the form appears to have changed
 7 a little bit in terms of the way it's printed
 8 but it contains the same sort of information?
 9 A. Yeah.
 10 Q. If we can just scroll down, please, and again.
 11 Yes, you can see that this is a form, version 4,
 12 dated November 2007, right at the foot of the
 13 page?
 14 A. Yes.
 15 Q. If we scroll back up, please. The year is not
 16 completed. You see that it was completed by you
 17 on 2 July?
 18 A. Yes.
 19 Q. This is for the Cowleymoor branch with some date
 20 ranges between July '05 and January '06. You'll
 21 see the standard format hasn't changed; can you
 22 see that?
 23 A. Yes.
 24 Q. Then if we scroll down, you'll see that the
 25 previous standard wording has been removed and

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1 it seems to have been replaced by analysis of
 2 Horizon Helpdesk call logs. Can you see that in
 3 the second box down?
 4 **A.** I can, yes.
 5 **Q.** Do you know why that was?
 6 **A.** I don't know why it's changed. I don't recall
 7 the form actually changing either, but yes.
 8 **Q.** Who was responsible for the design of these
 9 forms, ie the information that Post Office, as
 10 a prosecutor, was seeking from Fujitsu, as
 11 a third party provider of material?
 12 **A.** I assume that the Casework Team back in 2000, or
 13 even before that, drafted these forms and
 14 policies ready for when Horizon came in.
 15 **Q.** You would agree that the standard wording on the
 16 ARQ form that we saw before this one supports
 17 an understanding that any large computer system
 18 could suffer system malfunctions and, therefore,
 19 checks needed to be made to exclude at least
 20 those that had been reported?
 21 **A.** Yes.
 22 **Q.** Here, the position is changed. It's just asked
 23 for an analysis of the call logs. Again, do you
 24 know why that change was made --
 25 **A.** I don't know.

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1 that? What was the purpose of seeking this data
 2 from Fujitsu?
 3 **A.** To back up what was happening in branch, to
 4 assist the case.
 5 **Q.** Again, did you have any deeper understanding
 6 than that or were you just sort of filling out
 7 forms?
 8 **A.** Well, at this stage, filling out forms. We were
 9 just the interface between the Investigator and
 10 Fujitsu. So the email came in, we'd complete
 11 this form or the other version and off it goes
 12 to Fujitsu.
 13 I mean, if I go back to when I was an
 14 Investigation Manager, the only time I can
 15 recall obtaining logs was to demonstrate that
 16 certain transactions had gone through the system
 17 when they shouldn't have, things like that.
 18 I don't actually remember any audit shortages
 19 where I would have obtained logs.
 20 **Q.** If we go back to POL00051793 and look at that
 21 box a bit further down, please:
 22 "Please could you obtain a standard
 23 statement which confirms the Horizon system for
 24 the above post office was functioning properly."
 25 Can you see that?

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1 **Q.** -- rather than asking for a positive statement,
 2 confirmation that there are no reported system
 3 malfunctions --
 4 **A.** I don't --
 5 **Q.** -- that Horizon was working properly to
 6 an analysis of the call logs?
 7 **A.** I don't know the reason why it's changed.
 8 **Q.** In any event, you didn't ask for that in this
 9 case; you've marked it up as "No"?
 10 **A.** Correct.
 11 **Q.** Why wouldn't you want to know in a particular
 12 case whether a subpostmaster had made calls to
 13 the Horizon Helpdesk about Horizon?
 14 **A.** Again, it's what the Investigator is requesting.
 15 **Q.** Why might an Investigator not want to know that
 16 his suspect or her suspect has made calls to the
 17 Horizon Helpdesk?
 18 **A.** I don't know.
 19 **Q.** What did you understand the purpose of all of
 20 this was, seeking this data, as the person
 21 responsible for seeking it?
 22 **A.** So the purpose was for the Investigation Manager
 23 to advance the investigation. That's what this
 24 was designed for in the beginning.
 25 **Q.** But can you maybe look at it a bit deeper than

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1 **A.** I can, yes.
 2 **Q.** Did you not think that in each and every case it
 3 was a necessary element of a prosecution to
 4 prove that?
 5 **A.** Back then, no.
 6 **Q.** Why not?
 7 **A.** Because if Horizon hadn't been mentioned, or
 8 there were no concerns by other either party
 9 about Horizon, it, in my mind, I think, would
 10 have been superfluous to the nitty-gritty of the
 11 case.
 12 **Q.** So you didn't consider it a necessary element of
 13 the investigation, everything else being equal,
 14 to prove that the system that produced the data
 15 that you relied on was functioning properly?
 16 **A.** That was the assumption, in much the same way
 17 that, prior to Horizon, you had ECCO in Crown
 18 Offices, Capture or Jackson I think, in sub post
 19 office but I don't think we got any, as a matter
 20 of course relevant logs from those systems.
 21 **Q.** Was there any policy or guidance on this?
 22 You're a criminal investigator, you're seeking
 23 to prove a loss by computer-produced evidence.
 24 You either do or don't need to produce some
 25 evidence of system reliability and the reason

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1 that you do need to produce evidence of system
2 reliability is as follows, and the reason you
3 don't need to prove system reliability is as
4 follows.

5 **A.** I don't recall a policy outlining that.
6 **Q.** Again, we can see, although the forms are
7 differently worded, in one case some such data
8 was to be sought and in another it was not.
9 **A.** Yeah.
10 **Q.** What accounted for the difference of approach?
11 Why might it be needed in some cases and not
12 others?

13 **A.** I mean, it partly depends on the case. I notice
14 one of the things there is barcode and car
15 licence details. So primarily that would be
16 nothing required but, if the case did relate
17 to --

18 **Q.** I'm thinking more about the system integrity
19 box.

20 **A.** Oh, system integrity. I don't know, it's
21 whatever the Investigator indicated.

22 **Q.** Yes, that can come down. Thank you.

23 In paragraph 58 of your statement you say
24 that the Post Office was required to pay Fujitsu
25 for ARQ data over a certain amount of annual

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1 just scroll down, please, for the date, 2008,
2 bottom right, December 2008. Scroll up to the
3 top, please. Same title "Security Management
4 Service: Service Description", and go to
5 page 17, please.

6 Similarly, in the box on the right-hand
7 side, 720 ARQs or 15,000 query days.

8 **A.** Yes.

9 **Q.** What happened when that limit was reached?

10 **A.** I think, if that limit was reached, we would
11 then have to have paid extra. So we paid for
12 these services as part of the contract. If we
13 went over those, I think we got charged extra.

14 **Q.** What was the amount that you were charged? Can
15 you remember?

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

17 **Q.** Was it seen as a sum of a level that it acted as
18 a disincentive to seek ARQ data beyond the
19 limits?

20 **A.** I don't remember but, yes, possibly.

21 **Q.** We've heard evidence in the Inquiry, it was on
22 19 October this year, from Alison Bolsover who
23 was a Debt Recovery Manager; do you remember
24 her?

25 **A.** I do, yes.

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1 requests.

2 **A.** Yes.

3 **Q.** I think you say that the figure was around 720
4 requests in 2006?

5 **A.** Yes.

6 **Q.** Can we look, please, at FUJ00002033. Can we
7 look at page 16, please.

8 I've done that far too quickly. I should
9 show you the front page first.

10 This is a Fujitsu document dated 28 August
11 2006, headed "Security Management Service:
12 Service Description". Can we just please look
13 at page 16. If we scroll down, please, to 2.4,
14 it says this table, Table 2, defines the limits
15 on new and old data requests.

16 If we look at the box on the far right, the
17 limit per year shall be the first of the
18 following to be reached, 720 ARQs, yes --

19 **A.** Yes.

20 **Q.** -- or 15,000 query days. Do you know what the
21 query days related to, do you remember? There
22 is, in fact, a definition in here but do you
23 remember?

24 **A.** I don't remember.

25 **Q.** Can we look, please, at FUJ00080107, and if we
98

1 **Q.** She said that it would have been worthwhile for
2 the Post Office to obtain ARQ data before
3 commencing action against subpostmasters,
4 ie before suspension or termination, and
5 certainly before the initiation of any criminal
6 proceedings but that the quotes that were being
7 given by Fujitsu for doing that were
8 astronomical. Do you remember that?

9 **A.** Yes.

10 **Q.** Was cost essentially the reason that this data
11 was not sought as a matter of course, before
12 suspension and termination?

13 **A.** Cost was one of the factors.

14 **Q.** What were the others factors?

15 **A.** The other factors were whether we reached the
16 limit of requests, which would adversely impact
17 on investigations. So, for example, in previous
18 years, I think it was something like 350 a year
19 or 30-something requests a month, and I can
20 remember Investigators sending in requests and
21 say it was, I don't know, 20 October, we'd
22 already reached the maximum, so we used to ask
23 the Investigator "Can you wait ten days and
24 submit it on 1 November?" That way we could not
25 exceed our monthly requests. That was

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1 alleviated more when it increased to 720 but,
 2 yes, the costs were a part of that as well.
 3 **Q.** At the time, did it feel like cost for the
 4 provision of ARQ data was a significant issue
 5 for the Post Office?
 6 **A.** I would say yes, on the basis that costs and
 7 money spent throughout the Post Office was not
 8 frowned upon but they want to, you know, keep
 9 a tight rein on every penny spent.
 10 **Q.** The judge that heard the Group Litigation in
 11 2019 found that audit data should have been
 12 sought in every case where a subpostmaster was
 13 possibly going to be suspended or have their
 14 contract terminated, that the Post Office acted
 15 unreasonably in failing to seek such data before
 16 those events occurred, and that the commercial
 17 arrangements between the Post Office and Fujitsu
 18 did not justify the failure to seek the audit
 19 data, which was the best evidence of what had
 20 occurred and whether any bugs, errors or defects
 21 were operative.
 22 Was that something that you were aware of,
 23 obviously not the judge's view, but the essence
 24 of what he was to find when you were carrying
 25 out this work?

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1 relationship.
 2 **Q.** Specifically in relation to ARQ data?
 3 **A.** Partly in relation to ARQ data. I mean,
 4 I always found it a bit strange that we -- if it
 5 came to the crunch, we had to pay a lot of money
 6 for, in effect, our own data. But that's
 7 contracts for you. But, also, I seem to
 8 remember I think Fujitsu -- I might be wrong --
 9 got a penny for every transaction across the
 10 Post Office Network, which is worth a lot of
 11 money.
 12 **Q.** Can we turn, please, to FUJ00152212. You can
 13 see that this is a document, if we scroll to the
 14 foot, please, dated 2009. If we go to the top,
 15 please, "Management of the Litigation Support
 16 Service". Were you aware of something within
 17 Fujitsu called the Litigation Support Service?
 18 **A.** No, I didn't -- I didn't view it as a group of
 19 people, but just as the -- what they would
 20 provide us from a litigation perspective.
 21 **Q.** If you had to name people that provided
 22 litigation support to the Post Office within
 23 Fujitsu, who would you have named?
 24 **A.** Penny Thomas, Peter Sewell, Gareth Jenkins and
 25 Andy Dunks.

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1 **A.** No.
 2 **Q.** Putting it another way, was there an awareness
 3 by you and within your team that postmasters
 4 were being suspended and their contracts
 5 terminated without the full suite of data being
 6 obtained first and that that was potentially
 7 unfair?
 8 **A.** I wasn't aware of that because I don't know what
 9 Investigators would have requested Horizon data
 10 and when. I believe it wasn't every single
 11 case, so what you've said makes sense.
 12 **Q.** You must have been aware of what Horizon data
 13 Investigators sought and didn't seek because you
 14 were the gateway through which it had to pass?
 15 **A.** The Casework Team were but we never sort of said
 16 "Right, there's been 100 cases this year or
 17 we've had 100 ARQ requests, so that marries up",
 18 you know. We didn't reconcile cases against
 19 data requests like that.
 20 **Q.** Was there a view ever expressed within your team
 21 or a view that you heard that the Post Office
 22 regarded Fujitsu as an organisation which saw
 23 the Post Office as a cash cow?
 24 **A.** I don't recall that but, personally, I thought
 25 Fujitsu were doing quite well out of the

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1 **Q.** Anyone else?
 2 **A.** Not that I can recall, no.
 3 **Q.** Can we go to paragraph 7.1, please, in this
 4 document -- I'm sorry, my note omits the page
 5 number -- under the heading "Additional
 6 Litigation Support", Fujitsu's policy states:
 7 "Where additional information to that
 8 described in the standard litigation support
 9 service is requested, RMGA shall view each
 10 request on a case-by-case basis, and in
 11 accordance with the Change Control Procedure."
 12 Were you aware that, other than the standard
 13 provision of ARQ data -- which we can see was
 14 regulated by those two documents that we just
 15 looked at, the 720 or 15,000 query days -- there
 16 were litigation support services outside of
 17 that.
 18 **A.** I don't recall. Yeah, I don't recall.
 19 **Q.** This document says that Fujitsu were going to
 20 view each request on a case-by-case basis.
 21 Would you understand that to refer to the
 22 provision by Fujitsu of witness statements and
 23 the attendance of witnesses at court?
 24 **A.** Yes, on reading that.
 25 **Q.** It refers to the Change Control Procedure. Do

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1 you know what a Change Control Procedure is or
 2 the Change Control Procedure was?
 3 **A.** No.
 4 **Q.** You didn't know about a formalised mechanism by
 5 which a document was drawn up that contained
 6 a specification for the service required,
 7 provided limitations on the service to be
 8 provided and gave a cost or cost assumptions for
 9 the provision of the service, so it seemed like
 10 an amendment to the contract, essentially, for
 11 a bespoke activity?
 12 **A.** I don't remember that but ...
 13 **Q.** Did you ever receive any of those, or ask to
 14 comment on any of those, a change control
 15 notice?
 16 **A.** I don't recall. I mean, I notice at the top of
 17 this document Jane Owen from Security is
 18 mentioned.
 19 **Q.** Yes.
 20 **A.** I'm not in there. The previous one you showed,
 21 I think, Sue Lowther was the Post Office person,
 22 and the one before that was dated August 2006
 23 which was before I was --
 24 **Q.** You were doing something else then?
 25 **A.** Yes. So I may have seen these documents or
 105

1 to meet dates notified by Post Office limited
 2 for the production of this material and
 3 support."
 4 First off, I think you can see that this
 5 policy draws an explicit distinction or
 6 difference between the provision of evidence of
 7 fact and expert evidence.
 8 **A.** Yes.
 9 **Q.** Was that a distinction with which you were
 10 familiar at the relevant time?
 11 **A.** Not that I recall, no.
 12 **Q.** Were you aware that Fujitsu drew a distinction
 13 between the provision of evidence of fact and
 14 expert evidence?
 15 **A.** Not that I recall, no.
 16 **Q.** Were you aware that -- I think I know the
 17 answer -- that Fujitsu said that this
 18 specialised change control procedure needed to
 19 be brought into effect if expert evidence was
 20 required?
 21 **A.** I don't remember that.
 22 **Q.** Was that distinction between expert evidence and
 23 evidence of fact ever something that you saw in
 24 practice in administering these ARQ requests or
 25 other litigation support requests?
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1 equivalents but I don't recall them.
 2 **Q.** I'm thinking more about the outcome of them,
 3 namely if something outside the standard was
 4 required, certainly Fujitsu thought that
 5 a rather specialised or rarefied change control
 6 notice procedure needed to be undertaken?
 7 **A.** I don't recall.
 8 **Q.** We haven't seen any evidence of that. What
 9 we've seen is some emails being exchanged
 10 between people asking for things.
 11 **A.** Yeah.
 12 **Q.** Can we look at paragraph 7.2, "Expert Witness
 13 Evidence", Fujitsu's policy says:
 14 "Expert, in-depth analysis detailed 'expert'
 15 witness statements (as opposed to witness
 16 statements of fact) are rarely required.
 17 "However, in the event of such a request,
 18 RMGA will endeavour to provide 'expert'
 19 witnesses who are able to give more detailed and
 20 specific evidence to support Post Office's
 21 litigation activity. This 'expert' activity
 22 shall be provided on a case-by-case basis and
 23 shall be dealt with in accordance with the
 24 Change Control Procedure.
 25 "Again, RMGA shall use reasonable endeavours
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1 **A.** Not that I recall. If a statement was required,
 2 Fujitsu would provide that statement. I didn't
 3 see any distinction between what's written down
 4 here.
 5 **Q.** So when we saw that ARQ request you filled out
 6 earlier, the Misra one, asking for a witness
 7 statement which said that the system was working
 8 properly at all material times -- I'm
 9 summarising -- would you have seen that as
 10 a witness statement of fact or expert evidence,
 11 or an expert witness statement?
 12 **A.** Hopefully both.
 13 **Q.** Why both?
 14 **A.** Because we would want the statement to say it
 15 was working correctly, if it was working
 16 correctly, and whoever provided the statement
 17 would be the expert providing that view.
 18 **Q.** Did you expect any such statement from Fujitsu
 19 to contain an analysis to support a suggestion
 20 that Horizon was functioning correctly or with
 21 integrity?
 22 **A.** Yes.
 23 **Q.** Did you expect any such statement to explain
 24 what enquiries had been undertaken in order to
 25 be able to make a statement that Horizon was
 108

1 functioning correctly or with integrity?
 2 **A.** Yes.
 3 **Q.** What analysis would you expect, as
 4 an Investigator, to have been undertaken, if
 5 any, in response to a request for a statement
 6 which said that Horizon was functioning
 7 correctly or with integrity?
 8 **A.** If that was in the statement of the person from
 9 Fujitsu, I would expect them to explain, not
 10 that I would understand it, what they've
 11 actually done to verify that the system is
 12 working correctly.
 13 **Q.** Putting it another way, was the request for ARQ
 14 data seen by you and your colleagues to be
 15 a request for Fujitsu to perform, essentially,
 16 an administrative task, ie harvesting data from
 17 the system and providing it to you, or was it
 18 also a request for their qualitative analysis of
 19 what that data showed?
 20 **A.** I would say both, given their knowledge and
 21 experience. Yeah, both.
 22 **Q.** At the time that you were either
 23 an Investigation Manager or you were working in
 24 the Casework Team, or when you were working as
 25 an Accredited Financial Investigator, so in any
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1 data?
 2 **A.** I don't know if it was raw ARQ data but I've
 3 obviously seen a document where she's looked at
 4 something and come up with the report or a view.
 5 **Q.** Had you, as an Investigator, been trained to
 6 analyse ARQ data?
 7 **A.** No.
 8 **Q.** Had you and your colleagues received any
 9 training to spot any errors, bugs or defects
 10 disclosed in ARQ data?
 11 **A.** Errors, bugs or defects, no. I can't answer for
 12 them but I don't think so.
 13 **Q.** Would you have been able to identify within the
 14 ARQ data whether sufficient information had been
 15 provided to you, ie the dataset that you
 16 received, to be able to judge whether or not
 17 a transaction had been completed by the clerk or
 18 an SPM, a subpostmaster, as opposed to being
 19 a system-generated transaction?
 20 **A.** In the cases I can recall that I dealt with
 21 myself, I had received adequate information from
 22 the transaction logs I'd requested.
 23 **Q.** What does that mean?
 24 **A.** Well, if I can give you an example of a case.
 25 A subpostmaster has got stolen pension books and
 111

1 of those roles, did you have the technical skill
 2 and knowledge to be able to subject audit data,
 3 ARQ data, to detailed technical analysis?
 4 **A.** No.
 5 **Q.** Did any Investigator have such expertise?
 6 **A.** Some were more IT literate or *au fait* with
 7 technical things than others.
 8 **Q.** That's a slightly different issue. Did any of
 9 them have sufficient skills or training to be
 10 able to analyse the raw ARQ data?
 11 **A.** I don't know. I don't think so. I mean,
 12 I don't think we relied on colleagues for that
 13 purpose.
 14 **Q.** Were you aware of any colleagues doing that
 15 function themselves, ie getting the data and
 16 trying to read it, trying to analyse it, and
 17 themselves come to a view as to what it showed?
 18 **A.** I think the only person I can recollect who
 19 would get involved to that depth would probably
 20 be the Crime Risk Analyst, which was Helen Rose,
 21 at the time.
 22 **Q.** What time was that?
 23 **A.** That would have been well between 2008 and 2010,
 24 and probably earlier.
 25 **Q.** Did she, in fact, carry out analysis of raw ARQ
 110

1 he cashes five of them. Well, I used to get
 2 transaction logs and all five would have been
 3 cashed within the space of a minute, whereas
 4 ordinarily, if they were genuine, you would have
 5 customers queueing up and being paid out, and
 6 you would see the time of the encashments might
 7 be 7.00 in the morning, which was two hours
 8 before the Post Office even opened.
 9 So that's the extent to which I would get
 10 transaction and event logs, to prove that stolen
 11 foils had been cashed before the office is even
 12 open.
 13 **Q.** I think in one of your earlier answers you said
 14 that you didn't know or understand the
 15 distinction between what I've called standard
 16 ARQ data and enhanced ARQ data.
 17 **A.** Yes.
 18 **Q.** The latter of which had the facility to show
 19 that a transaction had been system generated
 20 rather than SPM generated?
 21 **A.** I wouldn't know.
 22 **Q.** So I think it followed that you didn't have the
 23 facility to be able to look at the ARQ data you
 24 received and say "Ah, that's type A, not type B
 25 data"?
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1 A. Correct. I'd see the data, I wouldn't know
 2 which of those streams it came from.
 3 Q. Can I turn to address an issue concerning
 4 problems identified with ARQ data between 2007
 5 and 2009, which led to the proposal to make
 6 changes to the standard, as it was called,
 7 statement. You deal with this in paragraph 69
 8 to 73 of your witness statement.
 9 That document can come down from the screen.
 10 So we're dealing here with a problem that
 11 has been spotted by Fujitsu with the ARQ data
 12 that's being produced and what was done about
 13 it, okay?
 14 A. Yeah.
 15 Q. Can we start, please, with FUJ00155399. Can we
 16 scroll down to Wendy Warham's email, so this is
 17 7 January 2009 -- you're not on copy at this
 18 time -- directly to Sue Lowther and David X
 19 Gray, subject "Security Incident":
 20 "Sue, I have left you a voicemail as I need
 21 to update you on a recent issue that has
 22 occurred and been resolved but does have some
 23 short-term impacts. In summary the issue as
 24 follows:
 25 "In December 2007 ..."
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1 data integrity during the period of May 2007 to
 2 November 2008 -- Penny will do this.
 3 "We need to discuss how we disclose the
 4 issue on the witness statements and we have some
 5 words which may be appropriate -- both need to
 6 discuss and agree the words.
 7 "Identify which witness statement we have
 8 supplied and are still awaiting court to confirm
 9 whether or not the data provided was May '07 to
 10 November '08 to (a) ensure events have been
 11 checked and (b) to recall and replace witness
 12 statements -- Post Office and Penny.
 13 "Further action
 14 "Automate the message store alerts on the
 15 system so that no manual intervention is
 16 required ...
 17 "Education to ensure that this type of
 18 incident is raised as a Major Incident in the
 19 security stack so we can communicate and manage
 20 this in accordance with incident timescales.
 21 "Apologies that this has not been
 22 communicated earlier but the review to security
 23 incidents should improve this issue."
 24 So, if we just scroll back up, please, this
 25 is talking about an historic problem with
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1 Just note the time there, December 2007 --
 2 A. Yeah.
 3 Q. -- and this email is being sent in January 2009:
 4 "In December 2007, an occurrence was
 5 reported in one office where a stock unit
 6 rollover coincided with the end of day process
 7 running. This led to a previously unseen
 8 database lock where an administrative balancing
 9 transaction failed to be written to the local
 10 message store database. This generated
 11 a generic and non-specific software error which
 12 went unnoticed in the monitoring of events.
 13 A financial imbalance was evident and was
 14 subject to investigation by Fujitsu Service
 15 Support Centre and Post Office Limited. The
 16 financial imbalance has been resolved.
 17 "A software [condition] was applied across
 18 the estate in early November 2008 to ensure that
 19 any such event generated would be monitored.
 20 Testing of that correction has established that
 21 the unmonitored error does not occur elsewhere
 22 in the system.
 23 "Impact
 24 "We need to work with the Post Office
 25 Limited to recheck the ARQs and reconfirm the
 114

1 Horizon --
 2 A. Yeah.
 3 Q. -- that may have had an impact from May 2007
 4 onwards --
 5 A. Yes.
 6 Q. -- which was discovered in 2007, December 2007,
 7 yes? An occurrence was reported --
 8 A. Yes.
 9 Q. -- in respect of which a change was made in
 10 2008, yes? But witness statements had been
 11 prepared for the purposes of criminal
 12 investigations and criminal proceedings which
 13 did not disclose this database lock, which
 14 affected balancing.
 15 A. Yes.
 16 Q. Correct? Is that a fair summary of this?
 17 A. I think so.
 18 Q. This was quite a serious issue, wasn't it?
 19 A. Yes.
 20 Q. Can we turn, please, to FUJ00155400. Can we
 21 turn to page 3, please. If we just scroll,
 22 thank you, it's your email of 7 January to Rob
 23 Wilson; can you see that?
 24 A. I can, yes.
 25 Q. It's in relation to that same security incident,
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1 and you say:

2 "Rob,

3 "In relation to the standard witness
4 statement Fujitsu provide:

5 "1) The following addition has been
6 inserted (see bullet point 11 on page 5). This
7 addition seems okay (it's just another check
8 that Fujitsu conduct -- to ensure the 'security
9 incident' doesn't occur again)."

10 The addition is:

11 "Windows Events generated by the counters
12 within the branch/time frame in question are
13 checked to ensure the counters were functioning
14 correctly."

15 Then 2:

16 "The following additional paragraphs have
17 been inserted, (page 7)."

18 If we just read that, the insertion:

19 "In December 2007, an occurrence was
20 reported in one office where a stock unit
21 rollover coincided with the end of day",
22 et cetera, et cetera.

23 You'll see that's drawn from the earlier
24 email we looked at; can you see that?

25 **A.** Yes.

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1 I thought this was a localised issue that had
2 been flagged up, so I looked at the details, as
3 far as I could understand them, and my view is
4 communicated to Rob Wilson, the Head of Criminal
5 Law.

6 **Q.** But surely, Mr Posnett, you realise that this
7 wasn't concerning because it affected or
8 potentially affected a small number of branches;
9 the concern was it was an unseen that meant that
10 part of a balancing transaction had not been
11 recorded in the local message store and
12 Fujitsu's systems had not picked it up?

13 **A.** I can only repeat what I've just said.

14 **Q.** Do you agree, on reflection, that that's
15 a serious issue, that not only there's
16 a problem, all computer systems have problems,
17 but the Fujitsu systems to identify it at the
18 time did not identify it at the time?

19 **A.** In hindsight, given what we know now, I would
20 change that paragraph.

21 **Q.** But even without what we know now, reflecting on
22 it, is it not a considerable concern that what's
23 described as a "previously unseen" database lock
24 had operated without the safety nets identifying
25 it?

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1 **Q.** So that was proposed to be inserted in the
2 standard Fujitsu witness statement, ie revealing
3 to people that there was a system fault which
4 affected balancing transactions and which had
5 not been spotted at the time. You say:

6 "I personally do not see the need for these.

7 If there are no problems identified with the
8 data relating to the case in question. Why
9 inform anyone about a problem we have had within
10 the network but possibly at one branch, if it
11 bears no relation or relevance."

12 Why did you form that view?

13 **A.** Because at the time, if it didn't impact on post
14 offices once Fujitsu had done their
15 investigations, what was the point of putting it
16 into a witness statement?

17 **Q.** Do you not agree that the exchange that we'd
18 looked at alerted you to the fact that there
19 could be bugs in the Horizon system, which
20 impacted on financial integrity, including the
21 integrity of audit data and they weren't picked
22 up by the system?

23 **A.** Again, I can't put myself back there but I've
24 mentioned previously that all computer systems
25 have issues. I thought -- I presume at the time

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1 **A.** I can any say that what I've written there
2 represented my personal view at the time, and
3 that's what I communicated to Rob Wilson, for
4 his stance on it.

5 **Q.** Putting it another way, it revealed that there
6 could be unseen bugs in Horizon?

7 **A.** Yes, but I didn't look at that -- I saw that as
8 one localised problem.

9 **Q.** But why?

10 **A.** Well, perhaps, at the time, that's the only
11 particular problem that's been referred to me.
12 I didn't look at that and think, "Oh, there's
13 bugs all over the place".

14 **Q.** I'm not suggesting that it meant there are bugs
15 all over the place. What it meant was that
16 Horizon was a system that could have bugs that
17 affected financial integrity and balancing and
18 the system did not reveal itself to have them.

19 **A.** I understand that but, again, I can't put myself
20 back there, but to me it reads as though it was
21 a one-off issue that had been flagged up to me,
22 and I've given my view and Rob Wilson has given
23 his view.

24 **MR BEER:** Thank you.

25 We'll end it there, sir. I think we'll have

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1 to pick that up tomorrow.
 2 **SIR WYN WILLIAMS:** All right. So we begin again at
 3 10.00 tomorrow. I'm sorry that your evidence
 4 has been truncated in this way, Mr Posnett, but,
 5 I'm sorry, it's unavoidable this afternoon.
 6 I don't suppose you'll want to, but if you
 7 do want to talk about your evidence this
 8 evening, resist the temptation. All right?
 9 **A.** Yes, sir.
 10 **MR BEER:** Thank you very much, sir. 10.00 tomorrow.

11 **SIR WYN WILLIAMS:** Yes.
 12 (2.28 pm)
 13 (The hearing adjourned until 10.00 am
 14 the following day)

I N D E X

DAVID POSNETT (sworn)	1
Questioned by MR BEER	1

<p>MR BEER: [14] 1/3 1/6 1/15 1/18 1/21 53/15 53/23 53/25 62/6 62/11 62/15 62/18 120/24 121/10 SIR WYN WILLIAMS: [10] 1/5 1/13 1/17 53/10 53/20 53/24 62/10 62/17 121/2 121/11</p> <hr/> <p>'05 [1] 92/20 '06 [1] 92/20 '07 [4] 8/18 74/2 74/3 115/9 '08 [4] 8/19 74/2 74/3 115/10 '86 [2] 3/5 3/7 '87 [1] 3/3 '95 [2] 3/13 3/13 '98 [1] 22/3 '99 [2] 4/11 21/21 'Accounting [1] 34/20 'BA [1] 20/23 'BA/POCL [1] 20/23 'drawing [1] 78/2 'error [1] 35/2 'expert [3] 106/14 106/18 106/21 'general [1] 34/2 'going [1] 28/14 'I [1] 71/15 'I will [1] 71/15 'integrity [1] 35/13 'security [1] 117/8</p> <hr/> <p>1</p> <p>1 November [1] 100/24 1.00 [3] 1/10 62/9 62/14 10 [1] 66/4 10,000 [1] 51/22 10.00 [3] 121/3 121/10 121/13 100 [2] 102/16 102/17 100,000 [1] 51/23 11 [1] 117/6 11.00 [2] 1/2 1/7 12 [1] 43/1 12.30 [3] 1/10 62/7 62/12 14 January [1] 89/8 15,000 [3] 98/20 99/7 104/15 16 [3] 71/8 98/7 98/13 17 [1] 99/5 19 [1] 59/21</p>	<p>19 October [1] 99/22 1986 [1] 3/4 1995 [1] 3/15 1996 [1] 64/4 1998 [4] 20/10 21/9 21/11 21/24 1999 [7] 3/24 4/1 4/9 4/12 14/16 14/22 21/19</p> <hr/> <p>2</p> <p>2 July [1] 92/17 2 June [1] 20/10 2.1 [1] 27/14 2.15 [1] 66/6 2.28 [1] 121/12 2.30 [2] 1/8 1/8 2.4 [1] 98/13 20 [3] 43/1 47/25 59/21 20 October [1] 100/21 2000 [17] 4/5 4/6 4/17 14/17 25/5 25/20 25/21 33/11 44/17 45/23 50/15 60/12 61/14 69/5 79/18 84/22 93/12 2002 [1] 63/1 2004 [12] 5/2 8/2 13/20 33/11 44/17 50/15 60/12 61/14 69/5 73/7 79/18 84/22 2005 [1] 89/7 2006 [3] 98/4 98/11 105/22 2007 [14] 8/12 8/15 73/5 73/7 92/12 113/4 113/25 114/1 114/4 115/1 116/3 116/6 116/6 117/19 2008 [12] 8/15 11/9 73/3 73/5 73/8 89/8 99/1 99/2 110/23 114/18 115/2 116/10 2009 [5] 86/8 103/14 113/5 113/17 114/3 2010 [13] 11/15 12/6 33/14 34/6 40/25 40/25 41/12 42/23 43/19 44/3 73/3 73/8 110/23 2012 [2] 50/3 50/9 2013 [7] 50/3 50/10 52/14 54/4 56/16 71/2 72/1 2014 [5] 12/10 13/7 52/14 72/5 77/11 2015 [8] 13/7 13/25 25/25 26/9 28/17 31/20 32/23 72/5 2017 [3] 3/5 3/7 13/25 2019 [1] 101/11</p>	<p>2023 [2] 1/1 2/7 23 years [2] 19/7 19/11 25 [1] 59/24 28 August [1] 98/10</p> <hr/> <p>3</p> <p>30 June [1] 89/7 30-something [1] 100/19 31 years [2] 3/1 3/7 350 [1] 100/18</p> <hr/> <p>4</p> <p>4 October [1] 2/7 43 [1] 47/3 44 [1] 2/11 44 pages [1] 2/8</p> <hr/> <p>5</p> <p>5 December 2023 [1] 1/1 5.11.6 [1] 71/9 50 per cent [1] 55/16 58 [1] 97/23</p> <hr/> <p>6</p> <p>60 [2] 47/22 49/10 65 [4] 51/14 51/16 51/17 52/17 65 per cent [6] 51/19 52/5 52/7 52/8 52/24 54/11 65,000 [1] 51/24 69 [1] 113/7</p> <hr/> <p>7</p> <p>7 January [2] 113/17 116/22 7.00 [1] 112/7 7.1 [1] 104/3 7.2 [1] 106/12 72 [1] 54/9 720 [5] 98/3 98/18 99/7 101/1 104/15 73 [1] 113/8</p> <hr/> <p>9</p> <p>9 June 2009 [1] 86/8 9 years [1] 3/13 90-odd [1] 11/22 90/60 [1] 49/10 97 [1] 88/4</p> <hr/> <p>A</p> <p>A1 [1] 2/7 able [8] 48/7 106/19 108/25 110/2 110/10 111/13 111/16 112/23 about [53] 2/18 3/13 3/14 3/14 4/9 4/14 6/16 7/6 8/2 17/3 20/19 23/1 24/20 24/21 25/25 29/22</p>	<p>32/15 32/25 34/20 38/2 38/20 41/14 41/21 43/18 43/19 43/23 45/11 47/22 47/25 48/21 49/9 54/17 55/12 56/5 60/14 65/1 65/1 65/4 70/15 74/12 78/6 84/23 85/3 87/15 94/13 96/9 97/18 105/4 106/2 113/12 115/25 118/9 121/7</p> <p>above [7] 10/20 10/21 34/18 45/1 82/11 89/6 95/24 accept [1] 38/24 Acceptance [1] 19/2 access [2] 58/19 58/20 accordance [4] 71/21 104/11 106/23 115/20 account [6] 8/24 11/21 19/14 19/18 34/1 83/25 accounted [1] 97/10 accounting [4] 34/24 63/24 65/5 65/9 accounts [3] 19/5 77/24 83/3 accreditation [2] 12/8 12/13 Accredited [7] 12/6 12/17 13/4 13/11 50/10 52/25 109/25 accurate [2] 22/1 33/21 accused [1] 64/22 achievement [1] 55/12 acquitted [1] 43/24 across [5] 44/19 54/10 58/21 103/9 114/17 act [7] 9/3 59/10 59/16 64/4 68/16 75/17 77/2 acted [2] 99/17 101/14 acting [1] 46/18 action [6] 40/10 66/17 68/10 74/23 100/3 115/13 actions [1] 35/9 activities [1] 40/1 activity [9] 49/23 50/22 50/23 51/13 52/14 52/16 105/11 106/21 106/21 actual [2] 17/12 50/19 actually [4] 49/14 93/7 95/18 109/11 add [2] 9/12 77/25</p>	<p>added [1] 28/9 addition [4] 29/19 117/5 117/7 117/10 additional [8] 36/18 83/4 85/23 88/8 89/22 104/5 104/7 117/16 additions [1] 32/24 address [2] 11/24 113/3 addressed [1] 89/24 adequacy [2] 23/21 29/25 adequate [3] 30/16 63/9 111/21 adhered [1] 64/19 adjourned [1] 121/13 admin [4] 8/25 9/5 9/22 12/4 administering [1] 107/24 administrative [3] 9/23 109/16 114/8 admission [1] 81/15 admits [1] 26/23 advance [1] 94/23 advantage [2] 63/25 64/13 adverse [1] 63/18 adversely [1] 100/16 advice [3] 65/22 66/2 72/3 affect [8] 48/6 55/11 59/7 59/11 63/19 66/16 67/10 68/9 affected [8] 55/10 59/8 77/1 116/14 118/4 119/7 119/8 120/17 affecting [1] 19/5 afflicted [1] 72/25 AFI [3] 53/3 53/4 60/15 afraid [1] 81/19 after [6] 8/7 8/9 18/11 25/5 41/8 45/23 afternoon [3] 62/15 62/19 121/5 again [25] 13/20 14/19 19/11 24/11 25/9 30/5 32/19 45/13 46/6 49/4 57/16 60/24 68/23 72/17 92/1 92/10 93/23 94/14 95/5 97/6 106/25 117/9 118/23 120/19 121/2 against [8] 21/5 54/3 54/9 63/20 68/10 79/11 100/3 102/18 agencies [1] 49/11 agency [3] 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