

Thursday, 11 January 2024

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2 (9.59 am)

3 **SIR WYN WILLIAMS:** A very important part of my task is to
4 ensure the chair is at the right height, otherwise you
5 won't see me, which may be a good thing.

6 Before we ask the witness to be sworn there's just
7 a few things I'd like to say, so if you'd sit down for
8 the moment, Mr Bradshaw.

9 First of all, I'd like to express the hope that
10 those of you who are regular participants in the Inquiry
11 have had a good break and you're refreshed and ready for
12 action, so to speak. Over the next three weeks, we will
13 be finishing Phase 4 of the Inquiry, and it will finish
14 with evidence from Mr Bradshaw today, evidence from
15 a number of employees and ex-employees of Fujitsu next
16 week, and then, following that, we will look at one or
17 two of the cases in other parts of the United Kingdom,
18 namely Northern Ireland and Scotland, and then we'll
19 hear oral submissions from some of the Core Participants
20 no doubt and receive written submissions from others.

21 There will then be a bit of a break. That, I'm
22 afraid, is inevitable because in between phases my
23 extremely hard working Inquiry Team need to be preparing
24 for the commencement of each phase, as of course do all
25 the Core Participants.

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1 issues. In fact, there are two. It's Dame Sandra
2 Dawson and Dr Katy Steward. They will be advising the
3 Inquiry in much the same way as Mr Atkinson KC did over
4 criminal and prosecution matters and Mr Cipione did
5 about some of the technical aspects relating to Horizon.
6 They are now busily engaged in looking at all the
7 relevant documents and preparing their evidence.

8 So we are doing our best to comply with the --
9 I won't say promise but hope that I've always expressed
10 that we would proceed diligently and expeditiously and
11 as quickly as reasonably practicable, but I've proved to
12 be very bad at predicting these things, as you will all
13 realise, but there it is.

14 We have to do a thorough job and, in the end, doing
15 a thorough job and hopefully getting it right is more
16 important than a few months here or there.

17 So thank you very much for listening to those
18 opening remarks and I now invite Mr Bradshaw to be
19 sworn, and Mr Blake to ask him questions.

20 **STEPHEN BRADSHAW (sworn)**

21 **Questioned by MR BLAKE**

22 **SIR WYN WILLIAMS:** Mr Blake, I think before you ask
23 Mr Bradshaw questions, he is in a category of witness
24 where it is appropriate for me to give what's called the
25 self-incriminating warning; is that correct?

3

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1 I wish I could tell you today precisely how long
2 that break will be but I can't do that, not least in
3 part because it is dependent upon the disclosure issues
4 carrying on smoothly and, as everyone will know, from
5 time to time, we have hiccups about that. I should
6 remind everyone that, in the phases to come, it is not
7 just the Post Office who will have an important
8 obligation in relation to disclosure because we will be
9 delving in the phases to come, in the activities of
10 Government departments and civil servants and senior
11 people of that kind. So there will be important
12 disclosure to be made by Government as well as Post
13 Office.

14 So that's why I can't be precise about the length of
15 the break before the start of Phases 5, 6 and 7. But
16 you'll have seen on our website that we intend that
17 those phases should be in the spring and summer of this
18 year, and that is my hope. My wife was extremely
19 alarmed to hear a news report yesterday that suggested
20 that Phase 6 would not start until the spring of next
21 year, and I was under severe pressure over that, I can
22 assure you. It is certainly my intention that that
23 phase starts long before the spring of next year.

24 I am pleased to report that the Inquiry has
25 appointed an expert witness to deal with the governance

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1 **MR BLAKE:** That is correct, sir, yes.

2 **SIR WYN WILLIAMS:** Can I ask you first of all, Mr Bradshaw,
3 are you legally represented today?

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

5 **SIR WYN WILLIAMS:** Right, thank you. So you probably know
6 that under our law a witness at a public inquiry has
7 a right to decline to answer a question put to him,
8 either by Counsel to the Inquiry or by any legal
9 representative or, for that matter, by me, if there is
10 a risk that the answer to that question would
11 incriminate the witness. This legal principle is known
12 in shorthand form as the privilege against
13 self-incrimination.

14 Mr Bradshaw, I have decided that it is appropriate
15 that I remind you of that principle before you begin
16 your evidence. However, it is for you to make clear to
17 me, in respect of any question put to you, that it is
18 your wish to rely upon the privilege and not for me to
19 keep interrupting, if you understand.

20 **A.** Yes.

21 **SIR WYN WILLIAMS:** If, therefore, any questions are put to
22 you by any of the lawyers who ask you questions or, as
23 I have said, by me, which you do not wish to answer on
24 the ground that to answer might incriminate you, you
25 must tell me immediately so that I can consider your

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1 objection and then, after, rule upon whether your
 2 objection should be upheld.
 3 Now, you have just told me that you're represented
 4 here today by a lawyer or lawyers, so if the issue
 5 relating to self-incrimination arises, I will permit
 6 those lawyers to assist you. So if at any stage during
 7 the questioning you wish to consult your lawyers, then
 8 you must tell me and then I will consider how it is
 9 appropriate to proceed. All right?
 10 **A.** Yes.
 11 **SIR WYN WILLIAMS:** Do you understand all that?
 12 **A.** I understand, thank you.
 13 **SIR WYN WILLIAMS:** Thank you very much. Over to you,
 14 Mr Blake.
 15 **MR BLAKE:** Thank you very much. Can you give your full
 16 name, please?
 17 **A.** Stephen Bradshaw.
 18 **Q.** Mr Bradshaw, can I ask you to come slightly forward
 19 towards the microphone, the stenographer is also taking
 20 a note, so if you could speak as slowly and carefully as
 21 possible?
 22 **A.** Yeah.
 23 **Q.** Thank you. You have produced two witness statements in
 24 this Inquiry so far. They should be in a bundle in
 25 front of you. The first witness statement we have a URN

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1 of your knowledge and belief?
 2 **A.** It is. That's my signature.
 3 **Q.** Thank you very much. Those statements will be published
 4 on the Inquiry's website and they're now in evidence.
 5 I want to begin just by asking you a little bit
 6 about your background at the Post Office. You've been
 7 employed by the Post Office since 1978; is that correct?
 8 **A.** That's correct.
 9 **Q.** You've held a wide range of roles.
 10 **A.** Yeah.
 11 **Q.** We've seen something called a telegraph officer, and
 12 a counter clerk in the 1970s and 1980s; is that right?
 13 **A.** Correct.
 14 **Q.** You were something called a Television Enquiry Officer
 15 in the mid-to late 1980s?
 16 **A.** That's correct, yes.
 17 **Q.** You held various roles in the Royal Mail Transport
 18 section?
 19 **A.** Correct.
 20 **Q.** Then in 2000, around the time of the rollout of Horizon,
 21 you became part of the Post Office Investigations Team?
 22 **A.** That's correct.
 23 **Q.** We see your role variously described as a Fraud
 24 Investigator and a Security Manager. Can you please
 25 assist us with which of those you were at a particular

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1 of WITN04450100 and that should be behind the first of
 2 those tabs. Do you have that in front of you?
 3 **A.** I do, yes.
 4 **Q.** Thank you. Is that statement dated 26 June 2023?
 5 **A.** That's correct.
 6 **Q.** Thank you. Can I ask you to turn to page 14 of that
 7 statement, please?
 8 **A.** Yes.
 9 **Q.** Do you see your signature there?
 10 **A.** I do.
 11 **Q.** Can you confirm that statement is true to the best of
 12 your knowledge and belief?
 13 **A.** That is my signature, yes.
 14 **Q.** Thank you.
 15 We have a second witness statement, the Unique
 16 Reference Number is WITN04450200. That should be in
 17 a tab behind that statement.
 18 **A.** It is.
 19 **Q.** That is dated 16 October 2023; is that correct?
 20 **A.** That's correct.
 21 **Q.** Thank you. If I could ask you to turn to page 8.
 22 **A.** Yes.
 23 **Q.** Do you see your signature there?
 24 **A.** I do.
 25 **Q.** Can you confirm that that statement is true to the best

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1 time, insofar as you're able?
 2 **A.** From the beginning, in 2000, the role was always there
 3 as an Investigation Manager, Fraud Advisor. The role
 4 remained the same -- investigation -- but the job title
 5 changed and, as it's rolled on towards the present day,
 6 it's been changed to just Security Manager.
 7 **Q.** So you're currently employed by the Post Office as
 8 a Security Manager, having held a number of roles in the
 9 Investigations Team, I think it was first called a Fraud
 10 Investigator?
 11 **A.** That's correct, yes.
 12 **Q.** Thank you. You've spent over 45 years at the Post
 13 Office?
 14 **A.** I have.
 15 **Q.** We're going to deal in due course with what you knew at
 16 any particular time but, just in terms of your career,
 17 is it right to say that you've been at the Post Office
 18 from the beginning of complaints about the Horizon
 19 system through to the Justice for Subpostmasters
 20 campaign, the Group Litigation, Court of Appeal
 21 overturning of convictions and up to and including this
 22 Inquiry itself?
 23 **A.** I was employed within Post Office Limited, yes.
 24 **Q.** I'd like to bring on to screen your first witness
 25 statement and that is WITN04450100. Can we please turn

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1 to page 15 of that statement. We see from page 15, and
 2 if perhaps we could scroll over the page, and over and
 3 over, we see all the documents that you were provided
 4 with in order to produce that statement. I think there
 5 are over 200 documents in total; do you recall?

6 **A.** Yeah, I've seen the documents and I've done my best to
 7 try to look at fully on each one.

8 **Q.** If we look at page 14, it stops at 14, so there are
 9 14 pages of evidence in that statement. The statement
 10 itself addresses various case studies, case studies that
 11 we're going to be looking at today.

12 Can we just turn to page 7, please. At the bottom
 13 of page 7 we begin with a case study of the case of
 14 Janet Skinner. If we go over the page, page 8,
 15 paragraph 21 and 22, 21 says:

16 "There were no concerns, the investigation was
 17 conducted in a professional manner at all times."

18 22:

19 "I do not have any other reflections about this
 20 matter."

21 Page 9, over the page.

22 **A.** Yeah.

23 **Q.** We have Hughie Thomas, Hughie Noel Thomas. Again,
 24 paragraph 25:

25 "There were no concerns, the investigation was

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1 Scroll down:

2 "I have no other reflections about this matter."

3 The case of Angela Sefton, paragraph 43:

4 "... no concerns ..."

5 Paragraph 44:

6 "... no other reflections ..."

7 Scrolling down, case of Anne Nield, if we keep on
 8 going down, paragraph 46:

9 "... no concerns ..."

10 Paragraph 47:

11 "... no reflections ..."

12 Susan McKnight, paragraph 49:

13 "... no concerns ..."

14 Paragraph 50:

15 "... no reflections ..."

16 Can we go over the page, please, to page 14,
 17 paragraph 54:

18 "I do not know what technical issues were
 19 investigated by [the Post Office]."

20 Paragraph 56:

21 "I cannot recall, if any, what information
 22 I received concerning bugs, errors and defects in the
 23 Horizon system."

24 Paragraph 57:

25 "I do not have any reflections on these matters or

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1 conducted in a professional manner at all times."

2 26:

3 "I have no other reflections about this matter."

4 Next, scroll down the page, the case of Khayyam

5 Ishaq.

6 **A.** Yes.

7 **Q.** If we scroll over the page, same form of words, 28 and
 8 29:

9 "There were no concerns, the investigation was
 10 conducted in a professional manner at all times.

11 "I have no other reflections about this matter."

12 Further down that page, we get to the case of Lisa
 13 Brennan, paragraph 33:

14 "There were no concerns, the investigation was
 15 conducted in a professional manner at all times."

16 Over the page, please:

17 "I have no other reflections about this matter."

18 Lynette Hutchings, another case study.

19 Paragraph 37:

20 "I could see no concerns about the conduct of this
 21 case.

22 "I have no other reflections about this matter."

23 Scrolling down to Joan Bailey, paragraph 40:

24 "There were no concerns, the investigation was
 25 conducted in a professional manner at all times."

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1 other matters relevant to the [Terms of Reference]."

2 Do you think that you have given enough thought,
 3 over the past 20 years, as to whether you may have been
 4 involved in what has been described as one of the
 5 largest miscarriages of justice in British history?

6 **A.** It would appear that, through not being given any
 7 knowledge from the top downwards, that if any bugs,
 8 errors or defects was there, it's not been cascaded down
 9 from Fujitsu, the Post Office Board, down to our level,
 10 as the Investigation Manager.

11 **Q.** So it's your evidence that because you didn't receive
 12 any information about bugs, errors and defects from
 13 somebody higher above you in the Post Office, you don't
 14 have any reflections on that?

15 **A.** I would see the Horizon system -- I have no reason to
 16 suspect at the time that there was anything wrong with
 17 the Horizon system because we'd not been told.

18 **Q.** That's over the time of your entire career at the Post
 19 Office?

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

21 **Q.** Up until the date when you drafted this witness
 22 statement and perhaps even up to today's date?

23 **A.** Correct, yes.

24 **Q.** Do you think that the approach that you've taken to
 25 providing information to the Inquiry, what looks like

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1 giving the bare minimum, was quite similar to the way
 2 you approached your investigations?
 3 **A.** No, not at all. I tried my best with the statement over
 4 what to put -- I can't put something down -- if I wasn't
 5 told about any issues with the Horizon system, I can't
 6 put that down. The investigations were done correctly.
 7 **Q.** That's because you weren't told anything about problems
 8 with the Horizon system?
 9 **A.** The investigation was done at the time, no problems were
 10 indicated by anybody that there was issues with the
 11 Horizon system.
 12 **Q.** Can we look at POL00325402, please. This is an email of
 13 February 2010 from Christopher Knight, he is a lawyer,
 14 to yourself, entitled "Horizon challenges"; that's
 15 15 years ago now. Could we scroll down that page,
 16 please. He forwarded to you a list of articles.
 17 **A.** No --
 18 **Q.** Talking Retail, we have BBC, the Taro Naw, that's the
 19 report on Noel Thomas' case; an article from The Grocer;
 20 and the article that is well known to this Inquiry, the
 21 Computer Weekly article written by Rebecca Thomson in
 22 2009. You were, of course, aware in 2010 --
 23 **A.** Mr Knight, who's an Investigation Manager at the time,
 24 I'd seen them and then send them on for information to
 25 people.

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1 to transactional queries?"
 2 If we go to page 3 of the same email chain, at the
 3 bottom of page 3, please, we have an email there from
 4 Mark Dinsdale, Security Programme Manager at the Post
 5 Office. Can we scroll up slightly, to Penny Thomas, who
 6 is at Fujitsu. Do you recall Penny Thomas?
 7 **A.** Penny Thomas was there, yeah.
 8 **Q.** You're copied into that email?
 9 **A.** That's right.
 10 **Q.** He says:
 11 "Penny, can we set up a process for these requests,
 12 because we are getting more and more of them.
 13 "Would you be able to provide the information Steve
 14 has requested ..."
 15 That's about the Rinkfield case.
 16 So in 2010 and 2011 you were certainly aware of
 17 a body of cases relating to the Horizon system that were
 18 building up, were you not?
 19 **A.** From that information, yes, and, as I said, if it's come
 20 up within the interview, I took the actions to try to
 21 find out what the issue with the Horizon was, hence the
 22 logs. In this case, Mr Dinsdale had set up all contact
 23 with the Fujitsu -- at Fujitsu would be done by the
 24 Casework Team.
 25 **Q.** Yes, but in 2010 you had received those articles

15

1 **Q.** So you were aware in 2010 of a body of reporting in the
 2 public domain about problems with the Horizon system?
 3 **A.** That's correct, yes.
 4 **Q.** That didn't cause you to reflect a little bit more?
 5 **A.** The only reflection is that, during any investigation,
 6 if the issue of Horizon -- issues would have had come
 7 up, it would have been explored with the person.
 8 **Q.** Can we look at FUJ00154879, please.
 9 Can we begin on page 5. This 9 February 2010,
 10 page 5., so the same year as those reports were
 11 forwarded to you. We have an email from yourself to
 12 somebody called Valerie Lipscombe, who was Valerie
 13 Lipscombe; do you remember?
 14 **A.** I'm not sure whether she was part of the Horizon call
 15 centre where you would get any -- because calls made
 16 into the business, you would have the business side of
 17 POL and then Horizon had their own call centre so you
 18 needed two types of the calls to see whether anybody had
 19 called.
 20 **Q.** You say there:
 21 "Valerie
 22 "Thanks for the logs.
 23 "I was wondering if you could help me further.
 24 I require logs of all calls in relation to Horizon
 25 problems, am I right in thinking the attached log is due

14

1 relating to problems with Horizon. You are aware from
 2 this communication that there was a body of cases
 3 relating to concerns about the Horizon system. Didn't
 4 that cause you pause for thought?
 5 **A.** The pause for thought is that when you would speak to
 6 the person being interviewed, you would take that into
 7 account. So if you're informed that there's an issue
 8 within Horizon, you would look, you would do your best
 9 to find out what the issue was --
 10 **Q.** But --
 11 **A.** -- and whether --
 12 **Q.** -- you began today by saying that nobody from above had
 13 been telling you about bugs, errors or defects?
 14 **A.** Well, I don't count Mr Knight as somebody from above.
 15 He was just equal and he's taken it from the papers.
 16 **Q.** So you were told by your equals that there were
 17 newspaper articles, you were told by your equals that
 18 there was a growing body of cases but that in itself was
 19 not sufficient for you to question the reliability of
 20 the Horizon system?
 21 **A.** Because I'm not technically minded with that. I would
 22 expect that to come from the people above. If there was
 23 an issue I would expect Fujitsu to inform the Post
 24 Office and for the Post Office to let us know what the
 25 issues are.

16

1 Q. These documents from 2010, we're going to go through
 2 a number of different case studies in due course. How
 3 early would you say you were aware of Horizon being
 4 raised as an issue?

5 A. Well, it was raised during these -- as you say, from
 6 2010, people were raising it from between there and over
 7 the next few years.

8 Q. Would you say 2010 is the starting point or is there
 9 an earlier point?

10 A. I'm not -- I think they may well have even -- some may
 11 have mentioned it earlier.

12 Q. Can we look at POL00120723, please. This relates to the
 13 case of Kim Wylie. This isn't a case study that we're
 14 going to be looking at but this is a document of
 15 February 2013. So that's three years after you received
 16 those articles from Computer Weekly, et cetera. It's
 17 a letter from Cartwright King to Ms Wylie's solicitors,
 18 and it says:

19 "Please find enclosed a Notice of Additional
 20 Evidence which includes two statements from Stephen
 21 Bradshaw dated 20 November 2012 and 19 February 2013 as
 22 well as an exhibit ... which is an extract from the
 23 subpostmasters' contract."

24 At the bottom of the page here, it says:
 25 "The Crown's position on the integrity of the

17

1 not the technicalities of the system.

2 Q. That's because you didn't have the technical knowledge
 3 to know whether there were bugs, errors or defects in
 4 the system, you don't feel confident to address those
 5 kinds of things?

6 A. Not at all.

7 Q. Can we scroll over a couple of pages, then, to page 5,
 8 please, and this is the witness statement that you
 9 submitted.

10 We have your name at the top there and it says, as
 11 follows:

12 "After a number of meetings between the Post Office
 13 Management and Members of Parliament in relation to the
 14 Court cases, it was agreed that the Post Office would
 15 undertake an external review of the cases which had been
 16 raised by the Member's constituents. As the Post Office
 17 continues to have absolute confidence in the robustness
 18 and integrity of its Horizon system and its branch
 19 accounting processes, it has no hesitation in agreeing
 20 to an external review of these few individual cases. In
 21 order to provide assurance to the interested parties, it
 22 was proposed that the review be undertaken by
 23 independent Auditors, Second Sight", et cetera.

24 So you've there said in a witness statement that the
 25 Post Office continues to have absolute confidence in the

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1 Horizon system is set out in Steve Bradshaw's statement
 2 dated 20 November 2012. There is no further disclosure
 3 in relation to this matter."

4 You've just said that you're not very technically
 5 minded, do you think that the submission of a witness
 6 statement from you, purporting to go to the integrity of
 7 the Horizon system, do you think that was appropriate?

8 A. No, because it depends on which statement it is. The
 9 use of putting a statement through explaining the basics
 10 of Horizon, that it was a keyboard, a scanner, a printer
 11 and the basic workings of Horizon, is that you
 12 scanned -- if you've got a document with a barcode you
 13 would scan the barcode and the transaction would go
 14 through. That's all that's normally explained in the
 15 statements I give.

16 Q. So you usually give a statement about the hardware,
 17 about --

18 A. -- hardware -- sorry.

19 Q. -- there is a computer that's plugged into a keyboard
 20 but you don't address the reliability of the Horizon
 21 system?

22 A. No, not at all. Just the basic workings as most people
 23 who have used the system that if we record the
 24 transaction, money due to customer, money due from
 25 customer: just the basic working knowledge of the thing,

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1 robustness and integrity of its Horizon system. Having
 2 given the evidence that you've just given about your
 3 lack of knowledge of the system, your lack of knowledge
 4 of technical matters, do you think it was appropriate
 5 for you to write that in a witness statement that the
 6 Post Office has absolute confidence in the robustness
 7 and integrity of the Horizon system?

8 A. I was given that statement by Cartwright King and told
 9 to put that statement through. In hindsight, after I'd
 10 put further in my previous statements there probably
 11 should have been another line stating, "These are not my
 12 words but the statement is produced as a business
 13 statement". I did not write that statement. We were
 14 told by Cartwright King to put that in.

15 Q. Who told you to put it in?

16 A. It would be one of the three members of Cartwright King:
 17 Martin Smith, Andrew Bolc or Rachael Panter. It would
 18 have come from one of them.

19 Q. So they drafted the entire statement and sent it to you,
 20 did they?

21 A. That's correct, yes.

22 Q. You didn't question it, you just signed it off?

23 A. Well, whether it was questioned at the time, you know,
 24 I would have been concerned but we were given the
 25 assurance that everything was fine to put that through

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1 and they wanted us to put it through. Nowadays,
 2 I wouldn't have put it at all, with what's known, but
 3 the hindsight.
 4 **Q.** We began half an hour ago, or 20 minutes ago, by looking
 5 at your witness statement for this Inquiry and looking
 6 at what appears to be a lack of reflection in that
 7 statement. Might having produced something like this
 8 have caused you to reflect on your involvement in some
 9 way?
 10 **A.** It may have done at the time but it is some 12 years --
 11 11 years ago.
 12 **Q.** You didn't think to yourself "Ooh, I produced a witness
 13 statement in criminal proceedings that could cause
 14 somebody to go to prison and I signed off the robustness
 15 of the Horizon system"; that wasn't something you
 16 thought you should reflect on in your witness statement?
 17 **A.** As I said, you know, this statement was given to me by
 18 Cartwright King and we were told to put the statement
 19 through.
 20 **Q.** How many times --
 21 **A.** On reflection, yes, when you look at it but, as I say,
 22 it's some 11 years ago and a number of statements have
 23 been produced since.
 24 **Q.** You were at the Post Office in a significant role during
 25 the Group Litigation, during the Court of Appeal

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1 the Horizon system at the time. That come from the
 2 lawyers.
 3 **MR BLAKE:** Could we scroll down on the page, please. I'll
 4 just read another paragraph on this statement. It says
 5 at the bottom:
 6 "All of the above is accepted based on the terms of
 7 Review being carried out, but this is in no way an
 8 acknowledgement by the Post Office that there is an
 9 issue with Horizon. Over the past ten years many
 10 millions of branch reconciliations have been carried out
 11 with transactions and balances accurately recorded by
 12 more than 25,000 different subpostmasters and the
 13 Horizon system continues to work properly in post
 14 offices across the length and breadth of the UK. When
 15 the system has been challenged in criminal courts it has
 16 been successfully defended."
 17 That's a 2013 witness statement.
 18 Mr Bradshaw, in a request that was sent to you for
 19 a witness statement, there were a series of general
 20 questions. You have them in the bundle in front of you
 21 but I can read them out. For example:
 22 "To what extent, if any, did you consider
 23 a challenge to the integrity of Horizon in one case to
 24 be relevant to other ongoing or future cases?
 25 "To what extent, if any, do you consider the

23

1 proceedings, throughout this Inquiry, and you didn't
 2 think back and perhaps regret having submitted a witness
 3 statement such as this and in criminal proceedings?
 4 **A.** As I say, with hindsight, you know, it's regrettable
 5 that the statement went through like that, as if it's my
 6 words, which is not correct.
 7 **Q.** But it hasn't caused you any moment of reflection?
 8 **A.** Of course it causes moments of reflection because you
 9 look at it and go that's completely wrong, because
 10 somebody's told me to put a statement through like that.
 11 **Q.** Do you know how many times you submitted statements like
 12 this?
 13 **A.** Like that one, I couldn't say. Probably -- that
 14 statement could have gone in from everybody within the
 15 Security Team to just about whatever case enquiry was
 16 ongoing at the time.
 17 **SIR WYN WILLIAMS:** Sorry, are you saying that a statement in
 18 this form was probably made by other members of the
 19 Security Team in other cases and, on each occasion, it
 20 was a statement drafted for them by a firm of solicitors
 21 and they just put their name to it?
 22 **A.** Sort of, sir, yes. What it would be is that, as these
 23 cases -- when the file has gone to the Criminal Law Team
 24 or, in this case, Cartwright King, they've given that
 25 statement to draft to put through as the integrity of

22

1 investigation into bugs, errors or defects in Horizon
 2 was sufficiently carried out by the Post Office? Please
 3 set out your reasons in detail.
 4 "To what extent, if any, do you consider information
 5 regarding bugs, errors and defects in Horizon was
 6 sufficiently passed to the Post Office by Fujitsu?
 7 Please set out your reasons in detail.
 8 "To what extent if any do you consider you had
 9 sufficient information regarding bugs, errors and
 10 defects in Horizon? Who provided you with information?
 11 And, if not, who should have?
 12 "Looking back, do you have any reflections on these
 13 matters or any other matters relevant to the Inquiry's
 14 terms of reference?
 15 "Are there any other matters that you wish to bring
 16 to the attention of the Chair of the Inquiry?"
 17 Could I ask for your first witness statement to be
 18 brought back on screen, please, WITN04450100. It's
 19 page 14, please, of that first statement. If we could
 20 scroll down slightly, these are your answers to that
 21 general section. We've been over them already this
 22 morning:
 23 "I don't know what technical issues were
 24 investigated ...
 25 "I cannot recall, if any, what information

24

1 I received concerning bugs, errors or defects."
 2 As somebody who wrote a witness statement in
 3 criminal proceedings in such strong, confident terms as
 4 we have just seen, might it have been sensible to have
 5 attempted to answer those questions that I've just gone
 6 through in a bit more detail?
 7 **A.** If I'd remembered fully that statement -- now I've seen
 8 the statement and remembered, you know, Cartwright King
 9 had given us -- gave us that statement to produce,
 10 I just didn't -- you know, for them sort of questions
 11 with that, it's just completely -- it's a statement
 12 that -- that's one of the few times, I would say,
 13 I don't recall that statement.
 14 **Q.** So when you came to draft your witness statement with
 15 those 200 documents that were provided to you by the
 16 Inquiry, that statement, you didn't think, "Ooh, I've
 17 submitted some statements in criminal proceedings, may
 18 have caused somebody to go to prison, I signed off
 19 Horizon?"
 20 **A.** As I said, I went through as many documents and tried to
 21 think but it was an awful lot of documents to try to put
 22 together with the statement.
 23 **Q.** Thank you. That can come down.
 24 You've said that that statement came from Cartwright
 25 King who asked you to sign it. Do you know how that

1 "Jarnail has drafted some words below. Do they
 2 strike the right tone?"
 3 If we scroll up, we have an email from Ronan
 4 Kelleher, who is the Head of PR and Media at the Post
 5 Office at the time. Do you remember Alwen Lyons, who is
 6 copied in there?
 7 **A.** I don't know her, no.
 8 **Q.** Alwen Lyons was the Company Secretary.
 9 Susan Crichton?
 10 **A.** I remember Susan Crichton.
 11 **Q.** She was the General Counsel?
 12 **A.** General Counsel, yes.
 13 **Q.** Mr Flemington, I believe, was a lawyer. You don't
 14 recall him?
 15 **A.** No.
 16 **Q.** Ronan Kelleher says as follows, he says:
 17 "As this message will most probably find its way
 18 into the media, we do need to get the message across
 19 from the start that we continue to have full confidence
 20 in the robustness of the Horizon system and then
 21 reinforce it so I suggest the following tweaking to the
 22 proposed wording from Jarnail."
 23 Now, I'll go through this form of words and I'll
 24 highlight to you the additional words that were added by
 25 the Head of PR at the Post Office. It says:

1 statement came to be drafted?
 2 **A.** It was drafted by Cartwright King and the Post Office.
 3 **Q.** And the Post Office?
 4 **A.** And the Post Office, above -- you know, whether it's
 5 Head of Security upwards, I'm not sure.
 6 **Q.** Can we look at POL00058155, please. If we could turn to
 7 the final page, we have there a proposed form of words
 8 from Jarnail Singh. Do you remember Jarnail Singh?
 9 **A.** I do.
 10 **Q.** He was the Post Office lawyer responsible for criminal
 11 matters, was he?
 12 **A.** Correct, yes.
 13 **Q.** Do you recall somebody called Hugh Flemington?
 14 **A.** I don't know him at all.
 15 **Q.** So Mr Singh has sent Mr Flemington a form of words and,
 16 if we scroll up, we see an email from somebody called
 17 Simon Baker it's above that one. Thank you. Do you
 18 recall somebody called Simon Baker?
 19 **A.** I don't know a Simon Baker.
 20 **Q.** No? So he says:
 21 "Alana
 22 "Please can help us craft our message around the
 23 Second Sight review. We need to combat the assertion
 24 that the review is acknowledgement that there is
 25 a problem with Horizon.

1 "After a number of meetings between Post Office
 2 Management and Members of Parliament in relation to the
 3 Court cases, it was agreed that the Post Office would
 4 undertake an external review of the cases which had been
 5 raised by the Members' constituents."
 6 Now, it's the next sentence that has been added
 7 by Mr Kelleher:
 8 "As the Post Office continues to have absolute
 9 confidence in the robustness and integrity of its
 10 Horizon system and it's branch accounting processes, it
 11 had no hesitation in agreeing to an external review of
 12 these few individual cases."
 13 Next paragraph:
 14 "In order to provide assurance to the interested
 15 parties, it was proposed that the review be undertaken
 16 by independent Auditors, Second Sight. The review will
 17 be specifically restricted to the cases raised by the
 18 [Members of Parliament] as well as reviewing the
 19 accounting procedures, processes and reconciliations
 20 undertaken in relation to the cases in question. Before
 21 formal instructions are given to the Independent
 22 Auditors, agreements will be sought from all interested
 23 parties, namely the Members of Parliament and Justice
 24 for Subpostmasters. The subpostmasters have requested
 25 a Forensic Accountant of their choice be appointed to

1 oversee the cases being reviewed by Second Sight."

2 Over the page:

3 "All the above is accepted based on the terms of the
4 Review being carried out, but this is in no way
5 an acknowledgement by the Post Office that there is
6 an issue with Horizon."

7 Now, we get to another sentence that was added by
8 the Head of PR:

9 "Over the past ten years, many millions of branch
10 reconciliations have been carried out with transactions
11 and balances accurately recorded by more than 25,000
12 different subpostmasters and the Horizon system
13 continues to work properly in post offices across the
14 length and breadth of the UK. When the system has been
15 challenged in criminal courts, it has been successfully
16 defend."

17 I think the last sentence there was Jarnail Singh's
18 but the one before was added in this chain of emails.

19 Were you aware that the contents of your witness
20 statement that we've seen reflected there was drafted
21 by, among other people, the Head of PR at the Post
22 Office?

23 **A.** Not at all. All I've seen was the final version when
24 they come from Cartwright King.

25 **Q.** Do you think it was appropriate for your witness
29

1 somewhat unusual?

2 **A.** As I say, yes, and then, if it was queried, you know,
3 the assurance was it's come from the lawyers and
4 everything is fine with it.

5 **Q.** Do you remember any conversation you had querying it?

6 **A.** I can't at all.

7 **Q.** I'm going to move on now to some case studies and I'm
8 going to begin by looking at the case of Lisa Brennan.
9 This is a case where the Court of Appeal quashed the
10 conviction and I'll just start by looking at what the
11 Court of Appeal had to say and that's POL00113278.
12 Thank you.

13 This is the Court of Appeal judgment in *Jo Hamilton*
14 *and Others*. Can we please look at page 59 which
15 addresses the case of Lisa Brennan. It's the bottom of
16 page 59, it says there:

17 "... Lisa Brennan (who had [been a Post Office]
18 counter clerk when she was 16 years old) was convicted
19 on 27 counts of theft representing a shortfall of
20 £3,482.40."

21 Just pausing there, was it usual to have so many
22 counts of theft representing what is a relatively small
23 shortfall?

24 **A.** The difference with this one, it's a P&A -- it's
25 a pension and allowance docket or voucher. In this case
31

1 statement to have been drafted in the way that it was?

2 **A.** No, not really, no.

3 **Q.** You say not really?

4 **A.** No, not really because it's not my words. That
5 statement is normally what -- what you would say to me
6 and I would write that down, rather than this is --
7 appears to be a business statement drafted by PR and
8 approved by the lawyers.

9 **Q.** Did you have any conversations with the lawyers at
10 Cartwright King or Jarnail Singh about the contents of
11 the witness statement that you were signing?

12 **A.** If I did, I can't currently remember what was said
13 because, as I say, it's 11 years ago. Whether I bought
14 up saying why are you putting this in or whatever, but
15 we were just given assurance that everything was okay
16 and had been approved.

17 **Q.** You gave, no doubt, other witness statements throughout
18 the lifetime of your career at the Post Office. Was it
19 your usual practice to sign a statement that had been
20 drafted for you by others?

21 **A.** I can't recall any that have been drafted by others.
22 There may have been one or two but it's normally, you
23 know, I would have produced me own witness statement or
24 it would have been taken by a third party.

25 **Q.** In those circumstances, did this not stand out to you as
30

1 was -- the vouchers were overstated. There was a number
2 of different types of fraud that took place concerning
3 these vouchers and this was an overstated voucher,
4 ie the value had been increased, and it was first found
5 and detected during a routine check by the DWP in their
6 branch in Lisahally.

7 **Q.** So what you're saying is it's 27 --

8 **A.** It's --

9 **Q.** -- possibly 27 vouchers to the total of £3,000?

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

11 **Q.** The Court of Appeal says as follows:

12 "On 6 September 2003, she was sentenced to six
13 months' imprisonment suspended for two years ... As
14 a result of the proceedings against her, she was forced
15 to file for bankruptcy.

16 "[The Post Office] decided to pursue criminal
17 charges against Ms Brennan in relation to events in
18 2001 -- close in time to the rollout of Horizon [which
19 we know rolled out from 2000 onwards]. According to the
20 limited available documentation, the prosecution case
21 was that she paid out cash for allowance and benefit
22 vouchers, she removed more cash than was permitted by
23 the voucher and kept the difference herself. The
24 evidence of theft depended on the difference between the
25 amount Horizon showed had been entered onto the system
32

1 and the lesser amount of the voucher.
 2 "Ms Brennan admitted the discrepancies. She said
 3 that they were errors on her part because of problems at
 4 home and pressures of work. She denied theft and said
 5 she did not know what had happened to the money.
 6 "[The Post Office] accepts that this was
 7 an unexplained shortfall case and that evidence from
 8 Horizon was essential to Ms Brennan's case. Her
 9 explanation was she must have made keystroke errors when
 10 entering voucher amounts onto Horizon. The prosecution
 11 did not consider whether a bug, error or defect could
 12 have affected this process. There's nothing to indicate
 13 that any ARQ data ..."
 14 That's Fujitsu audit data; do you recall that?
 15 **A.** I do.
 16 **Q.** Yes.
 17 "... was obtained at the time of the criminal
 18 proceedings. There was no evidence to corroborate the
 19 Horizon evidence. The issue at trial was dishonesty,
 20 but there was insufficient proof of an appropriation.
 21 "[The Post Office] concedes only that Ms Brennan's
 22 prosecution was unfair, but we are bound to conclude
 23 that her prosecution was, in addition, an affront to
 24 justice."
 25 Could we please look at POL00047322, and this is the
 33

1 afford to keep you."
 2 She says:
 3 "Don't sack me."
 4 He says:
 5 "Or you're fiddling the pensions deliberately and
 6 you're pocketing the money.
 7 "No, I haven't got it, I haven't got it, I haven't.
 8 He says: "Someone's got it".
 9 She says: "I haven't got it".
 10 If we scroll down the page, you then become involved
 11 in the interview here and you say:
 12 "It equates to about £5,000. No, I don't think it's
 13 carelessness. I don't think Tony thinks it's
 14 carelessness."
 15 She says: "I haven't got it".
 16 It's summarised:
 17 "Ms Brennan explained her financial and personal
 18 circumstances."
 19 You say as follows:
 20 "So you actually earn a little bit more than £180.
 21 Okay. If we just go off this, not that you're saying
 22 these are all mistakes, carelessness, isn't it a bit
 23 charge that they're just happening in the pensions and
 24 not in your other work?
 25 She says: "Like in what?"
 35

1 record of interview. If we scroll down slightly, you
 2 were the interviewing officer in Ms Brennan's case,
 3 alongside somebody called Anthony or Tony Gardner; is
 4 that correct?
 5 **A.** That's correct.
 6 **Q.** Was Mr Gardner a similar role to you in the
 7 Investigation Team?
 8 **A.** Mr Gardner was -- he'd been part of the Post Office, the
 9 old Post Office Investigation Department for about
 10 20 years.
 11 **Q.** Thank you. It begins addressing introductions made,
 12 caution issued. The caution was explained to
 13 Ms Brennan. Legal rights explained and the presence of
 14 legal representation was declined. So it seemed as
 15 though she turned down legal representation but she had
 16 a union representative in that interview; is that
 17 correct?
 18 **A.** That's correct.
 19 **Q.** Can we please turn to page 11 -- sorry, page 10, even.
 20 We'll start from page 10. I'm going to read to you some
 21 extracts from this interview. We have there AG, that's
 22 Mr Gardner. He says:
 23 "We've got a choice of 2 things, haven't we, Lisa,
 24 either you're totally incompetent and you're costing the
 25 Post Office £300 or £400 a week and therefore we can't
 34

1 You say:
 2 "Well, your giros have not been provided to be
 3 wrong, your savings bank has not been proved to be
 4 wrong. It's only pensions that have been proved to be
 5 wrong by £100 or £200 at a time."
 6 She says: "I don't know".
 7 Then Mr Gardner says:
 8 "I think it's a question of not whether you've done
 9 it but why you've done it."
 10 She says: "I haven't done it".
 11 He says:
 12 "I think you've done it deliberately."
 13 She says:
 14 "I haven't done it. I haven't done it. I've had
 15 pressures ... the work's been dead, the work we're doing
 16 ..."
 17 Then he says this:
 18 "No one else is making mistakes like you.
 19 She says:
 20 "They don't work as fast as me. I've been working
 21 dead fast."
 22 Can we go back, please, to your witness statement,
 23 that's WITN04450100. It's page 6, paragraph 19a.
 24 You're addressing a different case study in 19a. You're
 25 addressing the case of McDonald in this particular
 36

1 paragraph but you say here:

2 "... I can categorically state that I have never
3 said to anyone that I have interviewed and definitely
4 not to Jacqueline McDonald that she was the only one in
5 that position."

6 Should we take that statement to mean that, I,
7 Stephen Bradshaw, have never said to anybody that they
8 were in that position but the person sitting next to me
9 in the interview may well have?

10 **A.** I can't be -- I wouldn't expect anybody sitting next to
11 me to say "You're the only one in that position that
12 this has happened to". I've never heard that be said.

13 **Q.** Perhaps we'll return back to the interview then,
14 POL00047322?

15 **A.** May I just clarify I think I know what you're going back
16 to, if it's saying, "You're the only one in that
17 position", that would be for in that particular branch,
18 nobody else is having the same issues.

19 **Q.** Let's have look at page 11 of the interview that we were
20 just looking at, please. It's halfway down. Mr Gardner
21 said:

22 "No one else is making mistakes like you."

23 You were in that interview. You were sitting next
24 to him. Did you correct him? Did you say "That's not
25 an appropriate thing to say"?

37

1 **Q.** So you have no concern about that form of words being
2 used in that interview?

3 **A.** No, because her pension and allowances were checked and
4 it was found that only her submissions had shown
5 overstated vouchers.

6 **Q.** You have no concerns about Mr Gardner and his approach
7 to asking questions in interview?

8 **A.** It's a PACE interview.

9 **Q.** It's what, sorry?

10 **A.** It was an interview in accordance with PACE.

11 **Q.** Did you call it a "police interview"?

12 **A.** No, "PACE", sorry. And the questions are difficult.

13 **Q.** Do you think you were professional during the course of
14 the interviews that you carried out?

15 **A.** I do, yes.

16 **Q.** Do you think Mr Gardner was professional in the
17 interviews that he carried out?

18 **A.** I do, yes.

19 **Q.** I'd like to move on to the case of Janet Skinner,
20 please, and that's POL00113278. Ms Skinner was another
21 appellant in the *Josephine Hamilton* Court of Appeal
22 case. She had her conviction quashed. Could we look at
23 page 45, please, which details what the Court of Appeal
24 said about Ms Skinner. They say:

25 "On 5 January 2007 ... Janet Skinner pleaded guilty

39

1 **A.** As I explained, it has to be taken in the right context.

2 In this case for pension and allowances, everybody's
3 pension and allowance submissions in that branch were
4 checked. The only issues within -- I think it was B
5 stock unit that Ms Brennan had, they were the only
6 issues. She was the only one in that Post Office that
7 had the issue for pension and allowance. No other work
8 was affected.

9 And when you -- and the reason -- after you've
10 cashed the pension and allowance vouchers, you get
11 a printout and either Ms Brennan or another member of
12 staff would check the number of vouchers against the
13 printout and that's where you would identify any error.

14 **Q.** Quite a number of people have given evidence to this
15 Inquiry saying that they were told that they were the
16 only ones that this was happening to. A fair reading of
17 that is surely that she is being told that no one is
18 making mistakes on the Horizon system?

19 **A.** As I say, it has to be taken in the right context within
20 that branch, that she was the only one that was having
21 issues with the pension and allowance submissions.

22 **Q.** Do you think that that was therefore an appropriate
23 thing to say to her, that nobody else was "making
24 mistakes like you"?

25 **A.** In that branch nobody else was having them mistakes.

38

1 to one count of false accounting ... We understand that
2 the alleged shortfall was [£59,000]. On 2 February, she
3 was sentenced ... to nine months' imprisonment."

4 Paragraph 191 says:

5 "During a [Post Office] audit, Mrs Skinner had
6 volunteered that there would be a £40,000 shortage of
7 cash. In her interview under caution, she stated that
8 the losses had begun in January 2006. She [believed]
9 that she did not declare them as she could not afford
10 'to put it right'. She believed that one of her members
11 of staff had stolen the money, a belief in part
12 predicated on the belief that such a large amount of
13 money 'just [couldn't] go missing'. The prosecution
14 relied on the evidence of three of the four other
15 members of staff but were not persuaded that their
16 evidence was capable of materially advancing the
17 prosecution case. Between 1 January 2004 and 31 January
18 2005, Mrs Skinner made 116 calls to the National
19 Business Support Centre. Some of those calls concerned
20 Horizon faults and balancing."

21 The next paragraph, about halfway through that
22 paragraph, it says:

23 "It appears that there was no evidence to
24 corroborate the Horizon evidence. There was no proof of
25 an actual loss as opposed to a Horizon generated

40

1 shortage. There was no investigation into the various
2 Helpline calls made by Mrs Skinner. We are struck by
3 the fact that [the Post Office] failed to take these
4 steps despite Mrs Skinner's long service to [the Post
5 Office] and her professional progress (doubtless
6 reflecting her trustworthiness) from counter clerk to
7 permanent [subpostmistress] of the North Bransholme Post
8 Office."

9 It says there:

10 "[Post Office conceded that it] was unfair ... but
11 we are bound to conclude that her prosecution was ...
12 an affront to justice."

13 I'd like to look at a transcript of interview in her
14 case and that's at POL00112971, please. Thank you. Can
15 we turn to page 3. You were the interviewing officer in
16 Ms Skinner's case, alongside a colleague, Diane
17 Matthews; is that correct?

18 **A.** That's correct, yes, Ms Matthews was the Lead
19 Investigator.

20 **Q.** Can we start by looking at page 6. I'm going to take
21 you through a few parts of this transcript. About
22 halfway down that page and to the bottom there is her
23 explanation. So she says:

24 "It's just been going up and up for the past 5
25 months."

41

1 halfway down and to the bottom of page 25. This is
2 a conversation about a member of staff was paying money
3 back to Ms Skinner from a discrepancy that she had
4 identified. You say, as follows:

5 "Sorry, who is the subpostmistress? Who is
6 responsible for making losses ..."

7 I'll start slightly above, actually. You say:

8 "By your own admission you have not made your
9 shortages good. £1,400 has been outstanding since
10 November 2004."

11 She says:

12 "But it wasn't my outstanding shortage.

13 You say:

14 "Sorry, who is the subpostmistress? Who is
15 responsible for making the losses good?"

16 She says:

17 "That is the only thing that I'm bothered about.
18 You can investigate me as much as you want, I don't
19 care. I have got nothing to hide. You can search my
20 house, you can rip it apart, you can do the same in my
21 bank account for the past 5 years, I have got nothing to
22 hide whatsoever. The only thing that bothers me is the
23 fact that somebody going to be held responsible for that
24 and that somebody is me."

25 She's asked: "And why is it going to be you?"

43

1 She was asked by your colleague:

2 "Do you want to give us an account of why there is
3 over £59,000 short in your account?"

4 She says:

5 "If I had the answer I would give you it but
6 I haven't. It started off £7,500 and it's basically
7 gone up and to be honest I just thought that whoever was
8 taking it would be putting it back. I mean I can prove
9 to you, I'm here because I want to prove that I am
10 innocent. If you want to search my house you can, if
11 you want to search my banks you can. I have nothing to
12 hide whatsoever, I am not a thief."

13 There is another interview at, if we go over to
14 page 18, please. Sorry, actually, could we go to
15 page 10. About halfway down page 10 there's a question
16 from you. You say:

17 "Did you know it was a criminal offence to falsify
18 your accounts?"

19 She says:

20 "Yes. Like I've said it sounds draft really. It's
21 a large amount of money and I hope it gets found. I can
22 be investigated in any way and I have nothing to hide."

23 There's a second interview and we can see that at
24 page 18. Again, it's conducted by Ms Matthews and
25 yourself. Can we look at page 25, please. It's about

42

1 She says:

2 "Because it should have been my responsibility and
3 it should have been something I dealt with in the
4 beginning and I know that and that goes through my head
5 every day. And if I could answer for that sort of
6 money, I would answer. I know that I can prove
7 I haven't stolen any money. I ain't a thief."

8 Then you ask:

9 "How do we know you haven't stolen that money?"

10 She says:

11 "I know I haven't. I can sleep at night knowing
12 I haven't."

13 You say:

14 "We've got £59,000 shortage in your accounts. You
15 have offered no explanation as to where that money has
16 gone. You've got a £1,400 loss, everything is hunky
17 dory for 12 months."

18 She says:

19 "No, it isn't hunky dory. I couldn't force the
20 woman to pay the money that she didn't have cos that's
21 all it is. I couldn't force her, she didn't have the
22 money. All she kept saying was she didn't have the
23 money."

24 Then you say:

25 "But you rewarded her by giving her the keys come

44

1 into the office."
 2 She said:
 3 "Yeah, I know only because the customers were
 4 complaining that I was arriving at work late."
 5 You say:
 6 "Get up earlier. Your responsibility, you took the
 7 role of being subpostmaster. Diane will go through the
 8 rest. We are up to £9,000 and we have another £50,000
 9 to find."
 10 She said:
 11 "The rest just went missing through the year.
 12 I can't explain it any other way. You can break it down
 13 into pounds, pennies or whatever you want but I cannot
 14 explain it. If I had an answer I wouldn't be sat here."
 15 "Get up earlier": did you consider it to be part of
 16 your job to offer lifestyle advice to subpostmasters?
 17 **A.** Maybe not, but they were contracted to open up the Post
 18 Office at a certain time. And, you know, if you can't
 19 get up, you know, fine. I can't help my terminology.
 20 We all come from different parts of the country and we
 21 all have different ways of expressing it. I apologise
 22 if they don't like that sort of terminology. It wasn't
 23 meant as any -- to be detrimental towards her. It was
 24 just, sort of thing -- if you're forever arriving late
 25 at work, people say to you about getting up earlier to
 45

1 I'll concede and say no, it's not appropriate.
 2 **Q.** Some people may say yes, some people may say no. What
 3 do you say? Is it appropriate, is it not appropriate?
 4 **A.** As I say, it needs to be given the context of, you know,
 5 how the conversation goes. That, to me, at the time,
 6 appeared to be okay. If you can't get up and you're
 7 always late, you could lose the Post Office just by
 8 opening too late.
 9 **Q.** If you were still carrying out this role, if you were
 10 still interviewing people, if you work interviewing
 11 somebody tomorrow, would you have any concerns about
 12 using that language --
 13 **A.** I may phrase it a different way.
 14 **Q.** But you may still give similar advice?
 15 **A.** It's a very difficult question, isn't it, to advice.
 16 It's not really advice and advice-wise, you know, if
 17 you -- as I say, if you're always late, most people from
 18 being a small child and the school saying, you know,
 19 you'd need to get up earlier to get in on time.
 20 **Q.** Is it appropriate?
 21 **A.** I don't see a great deal wrong with it if you can't get
 22 in on time.
 23 **Q.** What's its purpose though? What purpose does it serve
 24 in an interview of this kind?
 25 **A.** The purpose there, was that she was always -- what she
 47

1 arrive on time.
 2 **Q.** My question was: do you think it was appropriate to give
 3 lifestyle advice because your evidence yourself has been
 4 that you were carrying out an interview under the Police
 5 and Criminal Evidence Act, a very serious interview. Do
 6 you think it is appropriate for somebody who is
 7 questioning somebody in relation to a criminal offence
 8 to tell them they need to get up earlier?
 9 **A.** As I said, you know, if it's my terminology and it's not
 10 liked, I apologise for that, you know, it wasn't -- the
 11 lifestyle is she's there for 9.00, she identified the
 12 person that she suspected of stealing the money. So to
 13 save her coming in, she gave that person the keys.
 14 That's all that conversation is. It has to be taken in
 15 the context of as it go -- when you read something it
 16 can sound better or worse than when it's actually spoken
 17 at the time.
 18 **Q.** Mr Bradshaw, you still work for the Post Office?
 19 **A.** I do.
 20 **Q.** In the Security Department?
 21 **A.** I do.
 22 **Q.** Do you consider still that it is appropriate to say to
 23 somebody in an interview that is very similar to
 24 a police interview, that they should get up earlier?
 25 **A.** Some people may say yes, some people may say no. Fine,
 46

1 said in -- she gave the keys to somebody else to open
 2 up, and that's fine. She can do that. But the keys
 3 were given to somebody she suspected of stealing money,
 4 which is a bit -- to me, is a bit strange.
 5 **Q.** What does it matter to you whether she opens or somebody
 6 else opens? You're carrying out a criminal
 7 investigation here. You're not actually assisting her
 8 with the smooth running of her Post Office, are you?
 9 **A.** Well, the smooth running would be that if she would be
 10 there to see what was happening from the post office --
 11 from start to finish.
 12 **Q.** Is it still your evidence that you were professional
 13 during the interview?
 14 **A.** Yes, I have -- I do.
 15 **Q.** I'm going to move on to the case of Jacqueline McDonald.
 16 Can we please look at POL00113278, please.
 17 Thank you very much. We're back again to the Court
 18 of Appeal. I'd like to look at, it's paragraph 179.
 19 I don't have the page number, unfortunately but if we
 20 can scroll down -- scroll up a little bit more, thank
 21 you.
 22 Jacqueline McDonald:
 23 "On 8 November 2010, in the Crown Court at Preston,
 24 Jacqueline McDonald pleaded guilty to theft. She
 25 pleaded guilty on 5 July 2010 to six counts of false
 48

1 accounting. On 21 January 2011, she was sentenced to
2 a total term of imprisonment of 18 months. A
3 confiscation order was made ... As a result of the
4 proceedings against her, Mrs McDonald was forced to file
5 for bankruptcy.

6 "An audit of her post office ... had revealed
7 a total shortage of [£94,000]. In interview [she] said
8 that she had experienced problems with Horizon and, when
9 she contacted the Helpline, she received no assistance.
10 She denied theft but accepted she had unintentionally
11 made false accounts.

12 "Mrs McDonald's defence statement made reference to
13 problems experienced with Horizon. The defence made
14 a number of disclosure requests but the prosecution made
15 no disclosure in respect of any Horizon reliability
16 difficulties. Mrs McDonald had made 216 calls to the
17 National Business Support Centre about transaction and
18 balancing problems. The pre-sentence report recorded
19 her as saying that she had not stolen the money but
20 admitted to accepting the system balances as correct in
21 order to roll over into the next trading period."

22 If we scroll down, I'll read the bottom half of
23 paragraph 182 and then into 183:

24 "Nevertheless, as [the Post Office] concedes, this
25 was a 'Horizon case'. The prosecution case was

49

1 in terms of your role, I think you signed schedules of
2 material purporting to be a Disclosure Officer?

3 **A.** Yes, I think we take the role as Disclosure Officer as
4 well. There's not an independent person.

5 **Q.** Thank you. If we, please, could turn to page 5. I'm
6 going to read to you a section of her interview
7 transcript. I'm going to begin with you, who says:

8 "You have just admitted that you falsified your
9 balance because you have inputted figures to enable you
10 to balance."

11 She says, "Yes".

12 You say:

13 "Do you know that's a criminal offence?"

14 She says: "No, I didn't".

15 Then there's a summary. It says that:

16 "[You] stated the accounts had possibly been
17 falsified from either November or March. [You] produced
18 [some sheets] and asked [her] to state who had written
19 the figures on the sheets. [She] said that some were
20 hers and [her colleague's] and some just [her
21 colleague's].

22 "[You] asked if [she] had any time off. [She said]
23 she had two days off in June. [Her colleague] was off
24 in May."

25 Then it says:

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1 dependent on data generated by Horizon and yet there is
2 nothing to indicate that any [Fujitsu audit data] was
3 obtained at the time of the criminal proceedings. There
4 was no evidence to corroborate the Horizon evidence.
5 Issues raised by Mrs McDonald were not investigated.
6 There was no proof of an actual loss as opposed to
7 a Horizon-generated shortage.

8 "[Post Office] concedes only that [her] prosecution
9 was unfair but we conclude that [the] prosecution was
10 ... an affront to justice."

11 I'd like to look at her interview. That can be
12 found at UKGI00014889. In this case, you were the
13 interviewing officer. Are we to assume that the person
14 who comes first is the main interviewer?

15 **A.** Yes.

16 **Q.** So you're assisted there by a colleague, Suzanne Winter.
17 Were you the officer in charge of the investigation of
18 Ms McDonald?

19 **A.** Yes.

20 **Q.** Yes. Were you the Disclosure Officer in her case as
21 well?

22 **A.** All papers that I would have had would have been
23 disclosed to our Criminal Law Team, who would then in
24 turn disclose it to the defence.

25 **Q.** I'm not asking about the quality of the disclosure but,

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1 "[You] discussed the last sheets starting
2 27 September and [she] confirmed it was her writing.
3 [You] asked [her] to explain what the figures are.
4 [She] stated the figures were what was in the safe in
5 the roller cash in the tills. She also stated they were
6 wrong and not worth the paper it was written on."

7 It says:

8 "SB asked where she would have got the figure of
9 £65,000. [She] said it would have been from the balance
10 from the computer."

11 Then it stops summarising and goes into the actual
12 words spoken. It says:

13 "Would you like to tell me what happened to the
14 money?"

15 She says:

16 "I don't know where the money is. I have told you."

17 You say: "You have told me a pack of lies".

18 She says:

19 "No, I haven't told you a pack of lies [because]
20 I haven't stolen a penny."

21 Again, concentrating on words used in interview,
22 "pack of lies" sounds somewhat like language you might
23 see in a 1970s television detective show. Was "pack of
24 lies" something you would say to defendants?

25 **A.** It's the same language sort of come out here. It's

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1 a PACE interview and it's not a nice interview.
 2 Normally, before entering interview, the majority of
 3 times I speak to people and say to them, "You know, it's
 4 not personal, the questions have to be asked. You won't
 5 like the questions". That's what it is. It is
 6 a criminal -- it's a criminal interview in accordance
 7 with PACE.
 8 **Q.** You have no difficulty with using those words in --
 9 **A.** It went through the court system afterwards and nothing
 10 was picked up by her defence team to say that it was
 11 oppressive or aggressive.
 12 **Q.** So because the defendant's representatives didn't say it
 13 was oppressive, you think that it is therefore
 14 appropriate language to use in an interview?
 15 **A.** As I say, it's a difficult interview.
 16 **Q.** Sticking with the same case, can we look at POL00141259,
 17 please. We're now in November 2010, it's the same case.
 18 It's a memo to you from Phil Taylor, who is a legal
 19 executive in the Criminal Law Division. Can you scroll
 20 down, please. Can you assist us with who Phil Taylor
 21 was? Was he a lawyer?
 22 **A.** I think he was a legal executive. He worked in the
 23 Criminal Law Team.
 24 **Q.** Does that mean that they're somebody who is not
 25 necessarily --

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1 **A.** -- and whether it's through me sort of going back to
 2 them or whatever.
 3 **Q.** Did that form of words that was used by somebody from
 4 the Criminal Law Team, that they haven't mentioned the
 5 *Misra* case, "They can find that out for themselves", did
 6 that cause you any concern?
 7 **A.** It's not very good, is it, at all? You know, it's like
 8 sort of saying -- throwing something away, "Oh, go and
 9 find it for yourself". It's not what I would expect
 10 from a set of lawyers, to behave.
 11 **Q.** This particular individual wasn't necessarily --
 12 **A.** No, he was part of the Division and acting on the -- for
 13 a lawyer from the Criminal Law Division.
 14 **Q.** Did that cause you to send an immediate memo back
 15 saying, "You've got it wrong"?
 16 **A.** As I say, I can't -- you know, we were talking some
 17 13 years ago now. But -- and, as I say, I know that it
 18 did come up and the defence team were informed of the
 19 *Misra* case but I don't know when they were -- when they
 20 were told.
 21 **Q.** Do you think disclosure was made, full disclosure of
 22 expert reports in that case, for example?
 23 **A.** Yes, because Ms McDonald, she put her own -- I think it
 24 was Charles McLachlan -- they put their own defence
 25 experts in.

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1 **A.** I'm not sure whether he was like the paralegal.
 2 **Q.** Does it sound a bit like a paralegal?
 3 **A.** Yeah.
 4 **Q.** Something like that?
 5 **A.** Yes.
 6 **Q.** Yes. He says, as follows:
 7 "Steve,
 8 "The file has gone dead since Jarnail did the
 9 attendance note on 15 July 2010. I have written to ask
 10 the Defence if they intend to serve an Expert's Report
 11 but I've not mentioned the *Misra* case to them. They can
 12 find that out for themselves."
 13 What was your understanding of the duties of
 14 cross-disclosure, so the duty to disclose information
 15 from one case in another case?
 16 **A.** Well, I would have expected the Criminal Law Division to
 17 disclose fully what's going on.
 18 **Q.** So did you turnaround, on receiving this letter, and
 19 say, "No, you've got it wrong, it's disclosable?"
 20 **A.** As far as I recall, the defence team were notified of
 21 the *Misra* case. At some stage --
 22 **Q.** That wasn't the question that I asked --
 23 **A.** At some stage -- all I can answer is that at some stage
 24 they were informed about the *Misra* case --
 25 **Q.** At some --

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1 **Q.** They put their own experts in that particular case?
 2 **A.** Yes.
 3 **Q.** But from Seema Misra's case, do you know what was
 4 disclosed?
 5 **A.** I don't.
 6 **Q.** No. If we look at POL00169419. This is a month letter,
 7 a month before that email. We have an email from Jon
 8 Longman to yourself and it includes some documents from
 9 the *Misra* case, including the final technical expert's
 10 report and it's that document I would like to take you
 11 to. That can be found at POL00169420. Thank you.
 12 Could we please look at page 17, which are the
 13 conclusions in the expert report that was obtained by
 14 Seema Misra. Thank you very much. Mr McLachlan says as
 15 follows:
 16 "It is evident that trial balances ... and period
 17 balances ... showed a continuous pattern of
 18 discrepancies throughout the period for which
 19 transactions were provided. It appears that no action
 20 was taken by the Post Office to investigate these
 21 discrepancies or to ensure that Ms Misra was competent
 22 to prevent them from arising. Instead, Misra removed
 23 an employee under suspicion of theft and implemented
 24 independent stock units for [either] counter. Neither
 25 action appears to have had resolved the issue."

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1 If we look at 3.3, he says as follows, he says:
 2 "The Horizon system has had problems in the past as
 3 acknowledged by [Mr] Jenkins [Gareth Jenkins from
 4 Fujitsu] in relation to Callendar Square.
 5 Unfortunately, the Post Office has not provided us with
 6 the opportunity to independently assess the possible
 7 impact on West Byfleet nor have they provided a list of
 8 known defects in Horizon. The 'travellers cheque'
 9 problem is an illustration of the known defects we
 10 independently identified but Jenkins confirmed that
 11 Fujitsu maintain a list, a full list which has not been
 12 released.

13 "The Horizon system is a component of the full Post
 14 Office Operating Environment. Other elements of this
 15 environment can result in changes to the cash balances
 16 recorded at the branch. Both Transaction Corrections
 17 and Remittances will act in this way. Jenkins was
 18 unable to provide any opinion as to the integrity of
 19 these systems and I was provided with no opportunity to
 20 investigate them. The Post Office has provided no
 21 evidence as [to] the integrity of these systems and the
 22 processes used to manage them."

23 So this is a report that you received that contains
 24 quite clear criticisms of the Horizon system; do you
 25 agree with that?

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1 has sent that to us for information and it would have
 2 been passed -- the Criminal Law Team would have been
 3 there at the time for the case.
 4 **Q.** When you say Criminal Law Team, who do you mean? Do you
 5 mean the Post Office?
 6 **A.** The Post Office solicitors.
 7 **Q.** So Mr Singh, for example?
 8 **A.** Well, at the time, it probably -- Mr Singh come more on
 9 board in 2012 when they split from Royal Mail. When
 10 Royal Mail Group become defunct and Royal Mail Letters
 11 were becoming independent, as a private company, that's
 12 when Mr Singh was attached to the Post Office Limited.
 13 Before that, there was number of lawyers in London in
 14 the Criminal Law Division.
 15 **Q.** So somebody in the Criminal Law Division would have been
 16 aware of this and what your expectation was that they
 17 would be responsible for disclosing that in another
 18 case?
 19 **A.** That's correct, yes.
 20 **Q.** That wasn't something that you needed to apply your own
 21 mind to?
 22 **A.** As I said, all information I will have had will be sent
 23 down to our Criminal Law Team and they made the actual
 24 disclosure to the defence.
 25 **Q.** Did you expect the Criminal Law Team themselves to take

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1 **A.** Yes.
 2 **Q.** Yes. From your evidence, where we began today about not
 3 knowing about bugs, errors or defects, in the system, it
 4 does seem that you received at least a defence expert
 5 report that did identify those kinds of issues with
 6 Horizon?
 7 **A.** People have said about bugs, errors and defects but, if
 8 you ask me what bug was there or what error or what
 9 defect, I couldn't tell you, and that's why I say
 10 I don't know of any bugs, errors or defects. People are
 11 quoting bugs, errors and defects but nobody has said
 12 this particular bug, error or defect. That's what I'm
 13 saying. Nobody has ever come or cascaded it down to say
 14 what particular bug, error or defect was in the system.
 15 **Q.** But this kind of information presumably is pretty
 16 pertinent to the case of Ms McDonald that you are
 17 charged with?
 18 **A.** And it would be passed to the prosecution, the Criminal
 19 Law Team.
 20 **Q.** Why do you say it was passed to -- you say it would be,
 21 I think, you didn't say was.
 22 **A.** Well, was.
 23 **Q.** How do you know that?
 24 **A.** That's my terminology again. Well, they were sort of
 25 added because the nature of coming out -- Jon Longman

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1 information from one of their cases and disclose it in
 2 another one of their cases?
 3 **A.** I would expect to with something like this. Anything
 4 that's relevant to something else we'd expect the
 5 Criminal Law Team, as lawyers, to let other people know.
 6 **Q.** When you were signing the disclosure statements of the
 7 Schedule of Unused Material, Schedule of Used Material,
 8 Schedule of Sensitive Material, did you cast your mind
 9 to that issue as to whether there was information that
 10 didn't appear on your schedule but that was held in
 11 relation to another case?
 12 **A.** I can't say I did.
 13 **Q.** Do you reflect on that at all?
 14 **A.** I can't say -- as I say, I can't say I did. I would,
 15 you know, look for the Criminal Law Team to deal with.
 16 If I'd put anything on, you know, with the -- it would
 17 have been filled in properly. If I hadn't have filled
 18 it in properly, I would have expected the lawyers to
 19 come back to me to say I've filled the form in
 20 incorrectly.
 21 **Q.** Can you not see a problem with signing a disclosure
 22 statement or a schedule of disclosure and, at the same
 23 time, assuming that there is other information not
 24 listed on there that was going to be disclosed to
 25 a party?

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1 A. Of course. There's always issues if something is not
 2 told but, as I said, you know, my understanding at the
 3 time, I had disclosed everything that was available to
 4 me, to them.

5 Q. Do you not see a problem, though, in you creating
 6 a schedule of material that doesn't include material
 7 that you think, for some reason, is going to be
 8 disclosed by somebody else?

9 A. As I said, all the information I had in that file was
 10 sent to the Criminal Law Team and --

11 Q. But this wasn't in that file, was it, this was in
 12 another case?

13 A. And it was held by the Criminal Law Team. So I would
 14 expect them to disclose it.

15 Q. So were they the Disclosure Officers in the case?

16 A. Well, ultimately, they are the Disclosure Officers
 17 because if they asked me to do any further work, it
 18 would be put in the statement to be sent down, and they
 19 would disclose it to the defence. I did not disclose
 20 anything directly to the defence.

21 Q. But you're signing schedules of material purporting to
 22 be the Disclosure Officer; are you saying that you
 23 nevertheless assumed that there was some other
 24 Disclosure Officer?

25 A. That's the process the Post Office put in for the file.

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1 A. No, you said to me there was other material and I said
 2 the Criminal Law Team would have a copy of that and, if
 3 it had to be disclosed, I would have expected them to do
 4 it.

5 Q. So if we look at the disclosure schedule in this
 6 particular case that was signed by you, do you think we
 7 will find this particular report?

8 A. I don't think so.

9 Q. You don't think so?

10 A. No, because I -- I may have done but I don't think so.

11 Q. Okay.

12 SIR WYN WILLIAMS: But isn't that the problem, Mr Bradshaw?
 13 I think -- forget about the technicalities of it -- the
 14 whole idea of having a disclosure statement signed by
 15 someone is to make that person responsible for its
 16 contents, yes?

17 A. Correct, sir, but, as I say --

18 SIR WYN WILLIAMS: Now, invariably, as I understand it, the
 19 Chief Investigating Officer becomes the Disclosure
 20 Officer and, for the moment, let's assume that's fine.
 21 Okay?

22 So the chief Investigating Officer has the
 23 responsibility for ensuring that all that should be
 24 disclosed in that statement is disclosed because he or
 25 she is putting their name at the bottom.

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1 All my paperwork would be put there, the unused, the
 2 exhibits would be signed off in the committal file and
 3 sent to the Criminal Law Team, who would then close
 4 everything to the defence.

5 Q. Can you see a problem with the assumptions that are
 6 being made here?

7 A. Of course. There's always problems if too many people
 8 are involved, or so on, they think somebody else may
 9 have done it. But I would have expected the Criminal
 10 Law Team to do -- to be the full Disclosure Officers.

11 Q. Saying that there's always problems, I mean, are you not
 12 troubled by that in the context of a criminal
 13 prosecution where somebody could go to prison?

14 A. As I said, this Inquiry is dealt with on its own merits
 15 and what I had would be sent to the Criminal Law Team.

16 Q. But do you not reflect on it and say, "I'm producing
 17 a schedule for criminal proceedings where somebody could
 18 go to prison and I'm not including all the material on
 19 that schedule"?

20 A. I have produced a schedule of all the relevant
 21 information I had to hand concerning that enquiry.

22 Q. But you're saying that there was other material outside
 23 of that schedule that you assumed --

24 A. You said to me --

25 Q. -- was disclosed?

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1 A. Correct.

2 SIR WYN WILLIAMS: So, at the very least, before you put
 3 your name to the bottom, if you are going to assume that
 4 Mr X, a lawyer in the Criminal Law Department, is going
 5 to provide some documentation to the defence, should you
 6 not liaise with him to ensure that that is done?

7 A. I understand what you're saying and what I've said is
 8 that every -- all the information I had to hand was sent
 9 to the lawyers. I agree with you --

10 SIR WYN WILLIAMS: Well, putting it simply --

11 A. I agree with him --

12 SIR WYN WILLIAMS: Putting it simply, you've agreed with
 13 Mr Blake that it was correct for the information in the
 14 *Misra* case to be disclosed in subsequent cases, because
 15 it was potentially helpful to the defence. Therefore,
 16 in a case where the Disclosure Officer was going to sign
 17 the disclosure form, should he or she not ensure, before
 18 the form is signed, that the information in the *Misra*
 19 case is there and ready for disclosure?

20 A. Ultimately, yes.

21 SIR WYN WILLIAMS: Thanks.

22 MR BLAKE: Thank you. Just two more documents before we
 23 take our mid-morning break. Can we look at POL00099689,
 24 please. We're sticking with the case of McDonald. This
 25 is a case that Ms McDonald made to Second Sight in 2013,

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1 so after her case. Can we please look at page 4. She
 2 says as follows, she says:
 3 "Shortly after I had been audited and my post office
 4 was taken away from me, I read an article in a magazine
 5 which highlighted other people who had suffered or were
 6 about to suffer the same hell I was going through.
 7 I then got in touch with the writer of the article who
 8 then put me in touch with the [Justice for
 9 Subpostmasters Alliance]. This was a very big surprise
 10 to me as I was led to believe by the Investigator for
 11 the [Post Office], Steve Bradshaw, that I was the only
 12 one in this position and this has never happened before.
 13 Steve Bradshaw is a liar and he knew the whole time as
 14 I am friends with another person he has prosecuted that
 15 was a member of the [Justice for Subpostmasters
 16 Alliance]. It is just unbelievable how I was made to
 17 feel like I was the only one and it made me isolated and
 18 paranoid about what was going on with the whole
 19 situation."
 20 Had you mentioned the Seema Misra case, Ms McDonald
 21 might have realised that she wasn't the only one.
 22 **A.** I've never said that to her. That's incorrect, that
 23 statement.
 24 **Q.** Well, we'll look at that, because we've seen Lisa
 25 Brennan this morning being told in her interview that

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1 **A.** All I do is interview, gather the information, send the
 2 file off and --
 3 **Q.** Treat everybody fairly and equally?
 4 **A.** As far as I'm concerned, I do, yes.
 5 **Q.** Can we please look at POL00165946, please. This is,
 6 I think, a self-appraisal form for 2010/2011; is that
 7 right?
 8 **A.** That's correct, yes.
 9 **Q.** If we scroll over to the next page, we have, at the
 10 bottom of that page, your position "I own performance",
 11 and it says as follows:
 12 "I take ownership of the objectives I agree for
 13 myself and my team that will help to deliver the
 14 business goals. I regularly discuss my team's progress
 15 against their objectives. I ensure that business goals
 16 and current team performance are highly visible to my
 17 whole team. I address poor performance and recognise
 18 achievement."
 19 Could we scroll down to the bottom of that page,
 20 please. It's number 5.
 21 "On 5 July 2010 at Preston Crown Court the offender
 22 pleaded guilty to false accounting but would not accept
 23 theft. I challenged the recommendations of the
 24 barrister and persuaded him that a trial would be
 25 necessary as the reasons given by the defendant (Horizon

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1 nobody else is making mistakes, haven't we?
 2 **A.** I'd explained that, that in that particular branch, she
 3 was the only person in that branch that was having that
 4 particular issue.
 5 **Q.** We've seen the letter from the lawyer at the Post Office
 6 taking a conscious decision not to tell Ms McDonald
 7 about Seema Misra's case. You remember that document,
 8 don't you?
 9 **A.** That's right and that's after the interview.
 10 **Q.** Yes. So Ms McDonald's complaint there that she was told
 11 that she was the only one, that rings true, doesn't it?
 12 **A.** It doesn't. I have never said that to her, that she was
 13 the only one, and the context --
 14 **Q.** Wouldn't that be consistent, though, with not raising
 15 Seema Misra's case with her?
 16 **A.** No, in the context of the interview at the time, I have
 17 not said to Ms McDonald that she was the only one. And
 18 also, with that, I don't know who she's friends with and
 19 I did not know whether she was a member of the JFSA.
 20 **Q.** Did you think that Ms McDonald's case was an important
 21 case to win?
 22 **A.** No, it's a case. It's a case and that's important
 23 whether it's -- you know, each case is treated on its
 24 own merit.
 25 **Q.** So this one is just like any other case?

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1 integrity) would have a wider [impact] on the business
 2 if a trial did not go ahead.
 3 "I also advised that a new trial date should be
 4 fixed as there are current issues ongoing regarding the
 5 Horizon system.
 6 "He agreed with me and consequently the Judge
 7 accepted these points and fixed a new trial date."
 8 It seems, certainly from your own feedback, from
 9 your own appraisal, that you saw it as, in some way,
 10 career boosting to press on with Ms McDonald's case
 11 because of problems with the Horizon system having
 12 a wider impact on the business. Do you not accept that?
 13 **A.** The issue would have been discussed with the prosecution
 14 barrister and, as you're probably well aware, when
 15 you're filling in one-to-ones sort of thing, there's
 16 always a flamboyant way of putting the words across.
 17 **Q.** "I challenged the recommendations of the barrister and
 18 persuaded him that a trial would be necessary as the
 19 reasons given by the defendant (Horizon integrity) would
 20 have a wider [impact] on the business if a trial did not
 21 go ahead."
 22 Are you saying that -- you're saying you had more of
 23 a role in things than you actually did?
 24 **A.** No, not at all. As I said, that's a flamboyant way of
 25 explaining what happened had gone on on the day.

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1 Q. But why would a barrister be concerned about the wider
2 impact on the business though?
3 A. I don't know. It will have been discussed with the
4 prosecution barrister and, again, everything of that
5 enquiry has to be taken into context. I mean, so it's
6 not just one little piece of it, it's a full inquiry of
7 how the money possibly went missing, et cetera. And
8 they had their defence expert, the -- and it was sort of
9 put in, prosecution spoke to defence barrister at the
10 second time.
11 Q. Is it right or wrong to say that you were concerned that
12 that case would have a wider impact on the business of
13 the Post Office?
14 A. It's wrong but, as I say, it's a flamboyant way of
15 explaining what had gone on on the day in the court --
16 Q. Sorry, when you say it's wrong, what do you mean? Was
17 that a thought that was in your mind during this case?
18 A. The wider impact is sort of, you know, it were -- at the
19 time, it wasn't proven, as far as I recall, 100 per cent
20 that Horizon was so faulty.
21 Q. Your concern in this particular case was that, if you
22 lost the case, that would damage the reputation of
23 Horizon?
24 A. Well, the damage would always come because once one part
25 has gone -- and, as I say, you look at the case, the

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1 numbers they go to.
2 Q. Does your success in a criminal case impact on the
3 amount that you're paid?
4 A. No, not at all.
5 Q. Does the number of cases that you successfully --
6 A. No, not at all. I'm paid whether one case is done,
7 1,000 cases or no cases.
8 Q. Your standard pay, yes, but in terms of a bonus --
9 A. No, I'm sorry.
10 Q. -- you are, I think you've accepted, paid a bonus
11 depending on how well you do?
12 A. No, a bonus becomes part of your pay, what's agreed by
13 the business.
14 Q. Yes.
15 A. And you don't get any extra bonus because of this. It's
16 all how well or not well you do your job, is how your
17 bonus is given.
18 Q. If you're considered to have, for example, protected the
19 business, prevented the wider impact on the business, do
20 you think that that might lead to a bonus?
21 A. It may do and it may not do, depending on who looks at
22 the forms that they put in.
23 MR BLAKE: Thank you, sir, that might be an appropriate
24 moment to take our mid-morning break.
25 SIR WYN WILLIAMS: What time shall we restart?

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1 case -- the shortfall was found by a Business
2 Development Manager, the audit was done following. They
3 declared the amount of cash that they'd done the night
4 before when the Business Development Manager went.
5 There was only 17,000 in they're, so you need the full
6 case to be able to judge it properly.
7 Q. You, playing the role that you did, managed to persuade
8 a barrister that a trial would be necessary because of
9 the impact on the business?
10 A. As I said, the way it's written is completely wrong.
11 I wouldn't write it like that now but it's
12 a self-appraisal for the way the business wanted things
13 doing --
14 Q. So was it true or was it not true?
15 A. There's probably truth in it but not maybe to the extent
16 of what it is.
17 Q. We've heard from some evidence about bonuses being paid
18 in relation to successful prosecutions. Are you aware
19 of anything along those lines?
20 A. Bonuses have always been paid around Royal Mail Group,
21 Post Office/Royal Mail. Bonuses have always been there.
22 Q. Would positive feedback relating to something like this,
23 might that impact on bonuses?
24 A. Well, it'd impact depending on what score they want to
25 give you, whether you're 1, 2, or 3 or 4 or whatever

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1 MR BLAKE: If we restart at 11.55 -- let's say 11.50.
2 SIR WYN WILLIAMS: 11.50.
3 MR BLAKE: I've quite a lot to get through.
4 SIR WYN WILLIAMS: Let's have a break.
5 MR BLAKE: Thank you.
6 (11.34 am)
7 (A short break)
8 (11.51 am)
9 SIR WYN WILLIAMS: Yes, Mr Blake. There may be a few
10 latecomers but we won't wait for them.
11 MR BLAKE: Thank you, sir.
12 I'm going to move on to the case study of Khayyam
13 Ishaq. Can we please go back to the Court of Appeal
14 judgment, that's POL00113278. It's page 49. This is
15 another case where the Court of Appeal quashed the
16 conviction. Am I right to say that you were the Lead
17 Investigator in Mr Ishaq's case.
18 A. Yes.
19 Q. I'll just read some of the Court of Appeal judgment.
20 They say that:
21 "On 7 March 2013, Mr Ishaq changed his plea to
22 guilty to the theft of £17,000. On 22 April 2013 he was
23 sentenced to 54 weeks imprisonment.
24 "The defence challenge to the Horizon system was
25 clear from a very early stage in the proceedings.

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1 Mr Ishaq's solicitor had informed [the Post Office] of
2 the issue and of the defence intention to instruct
3 an expert at an earlier Magistrates Courts hearing on
4 25 July 2012. A defence statement of 29 August 2012
5 repeated the defence challenge to Horizon and made
6 a series of disclosure requests targeted at the Horizon
7 system.

8 "Mr Ishaq denied theft but admitted altering items
9 on Horizon out of necessity in order to reconcile the
10 amounts and due to the system malfunctioning. The
11 defence repeatedly sought disclosure in relation to
12 Horizon and instructed an accountancy expert to analyse
13 the accounts.

14 "[The Post Office] produced evidence to demonstrate
15 the integrity of Horizon and relied in particular upon
16 the involvement of Mr Jenkins, who provided witness
17 statements and contributed to a joint expert report. In
18 a served witness statement, Mr Jenkins defended the
19 integrity of the Horizon system.

20 On 5 February 2013 the defence made a formal
21 application to a judge for further disclosure on
22 Horizon. The application was refused. The defence
23 served an addendum defence statement which alleged
24 Horizon malfunction and set out reports of technical
25 faults which Mr Ishaq had made to the Horizon Helpdesk.

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1 that?

2 **A.** I've seen that, yes, and I've looked at them.

3 **Q.** If we scroll down we have the rest of your evidence on
4 his case.

5 Can we please look at POL0046224, please. This is
6 the investigation report. Is this a document that you
7 drafted?

8 **A.** Correct.

9 **Q.** Yes. That's dated 13 May 2011, it's your investigation
10 report. I'd like to begin on page 6, please. Thank
11 you. If we scroll down, there's a section on business
12 and procedural weaknesses. You say there:

13 "Due to the circumstances given in explanation of
14 the audit shortage, at this moment in time I can see no
15 failures in security supervision, procedures or product
16 integrity that should be brought to the attention of
17 Contract Manager."

18 Is it possible to bring on screen, side by side,
19 your witness statement that we've just taken you to,
20 page 14 of that witness statement, please. Thank you.
21 So, on the left-hand side, if we could go to page 14,
22 you will recall that that is the page that addresses the
23 general questions that were put to you in your request
24 for evidence to the Inquiry. You say there, for
25 example:

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1 He had also made reports to the National Business
2 Support Centre about shortfalls and discrepancies.

3 "[The Post Office] accepts that this was
4 an unexplained shortfall case and that evidence from
5 Horizon was essential to Mr Ishaq's case. [The Fujitsu
6 audit data] for the indictment period was provided to
7 the defence on 26 October 2012. It is unclear what, if
8 any, analysis was performed with it. There was no
9 examination of that data for bugs, errors or defects or
10 for evidence of theft. It appears there was no evidence
11 to corroborate the Horizon evidence. The fact that
12 Mr Jenkins provided witness statements in itself
13 suggests that [the Post Office] did not disclose the
14 full and accurate position regarding the reliability of
15 Horizon. There was no proof of an actual loss as
16 opposed to a Horizon generated shortage.

17 "[The Post Office] concedes only that Mr Ishaq's
18 prosecution was unfair but we are bound to conclude that
19 his prosecution was an affront to justice."

20 Can we please return to your witness statement,
21 that's WITN04450100, at page 9. Thank you. If we look
22 at page 9, that's where you address the case of Ishaq
23 and we can see at the bottom there, we have at
24 footnote 3, a large number of documents that were
25 provided to you in relation to his case; do you recall

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1 "I do not know what technical issues were
2 investigated by the Post Office.

3 "I cannot recall, if any, what information
4 I received concerning bugs, errors and defects in the
5 Horizon system."

6 We heard this morning that you were aware of those
7 magazine articles in 2010 and there was an email
8 correspondence from the same year where there was
9 discussion about a number of challenges to Horizon
10 integrity. What investigation had you carried out in
11 relation to product integrity?

12 **A.** It's -- when the product come around you would see -- in
13 this particular case, it was a case of sheets of stamps
14 would have been reversed out the system, which
15 outweighed what was being sold.

16 **Q.** But you've said here in your investigation report that
17 you can't see any failures in product integrity. What
18 investigations had you carried out into product
19 integrity to satisfy yourself --

20 **A.** Whatever the product was, whether that would show up
21 any -- anything wrong with it, you know, that's all
22 I can say is that you would look at each one at the
23 time. I didn't go in and look at each individual
24 product because that's another member of -- another team
25 within the Post Office.

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- 1 **Q.** You were aware at this particular time of significant
2 allegations against the integrity of the Horizon system,
3 weren't you?
4 **A.** Well, with this particular inquiry, it didn't appear to
5 be anything to do with Horizon because it was reversing
6 out stamps that created the surplus.
7 **Q.** But, at this particular time, do you accept that you had
8 significant knowledge of allegations about the integrity
9 of the Horizon system?
10 **A.** There was knowledge at the time that people were stating
11 that there was issues with Horizon.
12 **Q.** It was your knowledge at that time?
13 **A.** People had told us, so yeah, I guess I probably will
14 have known.
15 **Q.** You say probably would have known. Let's have a look at
16 UKGI00015101. This is another case around a similar
17 time, 2 March 2011. This is the case of Damian Owen;
18 was that a case that you were also the Investigating
19 Officer?
20 **A.** No, not at all.
21 **Q.** You weren't involved in that case?
22 **A.** Not at all.
23 **Q.** You didn't see this defence statement, if we scroll
24 down?
25 **A.** No, not at all.

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- 1 adjustments by way of 'reversals' on the Horizon system
2 so as to ensure the sales, receipt and stock figures
3 reconciled."
4 If we carry on, please, over the page, we have
5 a number of disclosure requests that were made by the
6 defence in Mr Ishaq's case. If we scroll down a little
7 more, we can see at 11(ii), for example, they request:
8 "All the material to the knowledge of the
9 prosecution in existence (whether in the hands of the
10 prosecution or third parties) that reasonably supports
11 (or is reasonably capable of supporting) the contention
12 that the Post Office Horizon software/hardware system
13 has proved to be unreliable and/or inaccurate and/or
14 unstable and/or susceptible to well function and/or
15 otherwise prone to the production of erroneous results
16 ...
17 "(iv) The full results (whether provisional or
18 final) of all internal and/or external investigations
19 and/or enquiries and/or reviews (whether instigated by
20 the Post Office or any other body) into the correct
21 functioning of the Post Office Horizon hardware/software
22 system."
23 Over the page:
24 "(v) Any in internal memoranda and/or guidance notes
25 and/or material dealing with the correct or incorrect

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- 1 **Q.** No knowledge of that?
2 **A.** Not Damian Peter Owen, no.
3 **Q.** Okay. Let's return to Mr Ishaq's case, then. Can we
4 look at POL00058254, please. We have the defence
5 statement. We've just seen the defence statement in
6 Mr Owen's case, let's look at the defence statement in
7 Mr Ishaq's case. This is August 2012. Can we please
8 turn over the page. This is a document you would have
9 seen at the time, isn't it?
10 **A.** Yes.
11 **Q.** Thank you. If we scroll down, this is a case management
12 that is produced to set out the nature of the
13 defendant's case and, if we look at paragraph 7, that's
14 over the page, please, he states as follows:
15 "The nature of the Defence in relation to this
16 allegation is:
17 "(i) There was no appropriation of monies. The Post
18 Office 'Horizon' software/hardware system had in the
19 past on numerous occasions malfunctioned causing
20 difficulties in reconciling sales, receipt and stock
21 figures. The Defendant had reported the same to the
22 Post Office helpline seeking assistance but little or no
23 successful assistance was afforded to him despite the
24 said requests.
25 "(ii) The defendant had of necessity to make certain

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- 1 functioning of the Post Office Horizon hardware/software
2 system ..."
3 This is a case that you were the Investigating
4 Officer?
5 **A.** Correct, yes.
6 **Q.** Can we please look at POL00119430, please. An email
7 from September 2012 from Martin Smith, he is a lawyer at
8 Cartwright King; is that correct? Do you recall? If we
9 scroll down, we see his --
10 **A.** Yes, if it's come from Cartwright King.
11 **Q.** Yes. Thank you. This is an email sent -- you're
12 included on the distribution list. Who was Sarah
13 Porter, do you recall?
14 **A.** I'm not sure whether she's somebody that actually works
15 with -- in Cartwright King or it's somebody else.
16 I don't really recall that name.
17 **Q.** He says:
18 "Good morning, Sarah,
19 "Please find attached copies of a letter from the
20 [defendant's] solicitors and the Defence Case
21 Statement."
22 That's the document we've just been looking at:
23 "The Defence are clearly aware of the current
24 Horizon issues and are on a fishing expedition. This in
25 my view is a red herring. The stamp sales which had

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1 been reversed thereby increasing the stock and lowering
2 the amount of money needed to achieve a balance were
3 clearly not there at the time of the audit."

4 So he has described it as a fishing expedition.

5 What's your understanding of a fishing expedition?

6 **A.** Can I just go back there? I think Sarah Porter way well
7 be the agents -- it's either -- she either worked for
8 Cartwright King or they're agents from the Yorkshire
9 area known to look after that case. It's only
10 a possibility but I think that's where it may be.

11 **Q.** Thank you very much.

12 **A.** A fishing expedition is just throwing anything around to
13 see what comes out from it.

14 **Q.** We've seen a number of requests made in that defence
15 statement for disclosure; did you seek and obtain the
16 information that was sought?

17 **A.** If Cartwright King, either via Sarah Porter, if it's
18 from our prosecution agents of Cartwright King, didn't
19 do it, and Cartwright King have asked me for anything,
20 I will have done whatever they requested.

21 **Q.** You would have done whatever they requested?

22 **A.** Yeah.

23 **Q.** We spoke earlier about, for example, reliance on the
24 Post Office's own Legal Team to cross-disclose from
25 other cases.

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1 it be Mr Ishaq's or whatever, to our lawyers and I would
2 expect them, as the people dealing directly -- because
3 I wouldn't deal direct with any defence solicitors.

4 **Q.** Who do you think was responsible for disclosure?

5 **A.** I would say our lawyers, acting on behalf of the Post
6 Office.

7 **Q.** What do you think your duties were in relation to
8 disclosure?

9 **A.** To let our lawyers know everything that I had possibly
10 got.

11 **Q.** So your duty is to provide them with everything you have
12 in a specific case but not in relation to your broader
13 knowledge?

14 **A.** I would say so, yes.

15 **Q.** Then you saw it as their duty to make disclosure in
16 relation to the broader context?

17 **A.** Yes, that's correct, yes.

18 **Q.** Can we please look at POL00056596, please. This is at
19 an earlier stage in the case, this a memo from Maureen
20 Moors in the National Security Team at the Post Office,
21 and it's about this particular case, Mr Ishaq. It's
22 sent to you.

23 **A.** That's right, yeah. Maureen Moors was part of the
24 Casework Team. She was the Postal Officer in the
25 Casework Team.

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1 **A.** Yeah.

2 **Q.** Here we have Cartwright King, so an external firm,
3 perhaps a lawyer who doesn't have sight of every case,
4 and you have also, as you said, Sarah Porter, who is
5 potentially yet another external firm. Who is best
6 placed out of all of you?

7 **A.** Cartwright King took over from Jarnail Singh.
8 Cartwright King become the Post Office lawyers so, as
9 the Investigation Officer, whatever information they
10 required, they will have asked and I would have
11 provided, if possible, the information back to them that
12 they would have shared back towards the defence.

13 **Q.** So, in terms of your assumption that somebody would have
14 been disclosing additional documents that weren't on
15 your schedules, what do we assume now in relation to
16 Cartwright King, that they are then responsible for this
17 further material?

18 **A.** Cartwright King would have taken it over as the people
19 who would deal with the defence solicitors.

20 **Q.** What about the defence report in the Seema Misra case,
21 for example, and other complaints that we've seen those,
22 even those 2010 magazine articles that you were sent?
23 Did they form your disclosure in this case?

24 **A.** As I said, as I explained earlier, I will have disclosed
25 everything I had, appertaining to whatever case, whether

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1 **Q.** So she was the caseworker, you were the Investigator --

2 **A.** Yeah.

3 **Q.** -- and she gives an opinion as to sufficiency
4 of evidence or --

5 **A.** Not at all. All she's basically done is forwarded on --
6 that's been addressed from Legal Services because this
7 was around about the time of the crossover between the
8 Criminal Law Team, ie Jarnail Singh, and Cartwright King
9 taking over completely. So the Legal Services, that's
10 where they were based, as Royal Mail Group, when the
11 split come, lawyers stayed with Royal Mail Letters.

12 **Q.** Yes.

13 **A.** Jarnail Singh become Post Office and they would then
14 send it to the Casework Team and in this case Maureen,
15 and Maureen would forward that on to be attached to the
16 file.

17 **Q.** So for whose attention was this particular document?

18 **A.** I think it's to let the Security team know and it's
19 forwarded on to me and I would put it in the file.

20 **Q.** So, as the Investigating Officer, is this -- if we
21 scroll up, it's a memo, so it's not a letter.

22 **A.** No.

23 **Q.** Is this effectively a memo for your attention?

24 **A.** Yeah.

25 **Q.** Yes? Can we scroll over the page, please. We can see

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1 at the very bottom it's from Rob Wilson, who is, at that
 2 stage, Head of the Criminal Law Team?
 3 **A.** Yes, that's correct.
 4 **Q.** If we look at the very top of the current page we're on,
 5 he says as follows:
 6 "You will be aware of the provisions of the Criminal
 7 Procedure and Investigations Act 1996 concerning
 8 disclosure. Please confirm whether there is any
 9 material which might reasonably be considered capable of
 10 undermining the Prosecution case or assisting the
 11 Defence case and which has not already been disclosed.
 12 Please also let me have [various forms]."
 13 So that is a test that you were aware of?
 14 **A.** That's right. They're all the forms for the
 15 committal -- for a committal.
 16 **Q.** Yes. So that is a test that is being repeated to you by
 17 the Head of the Criminal Law Team.
 18 **A.** That's right.
 19 **Q.** Do you still say that it was the responsibility of
 20 Cartwright King to ensure appropriate disclosure and not
 21 your responsibility?
 22 **A.** Cartwright King for the -- if you're talking about the
 23 *Misra* part, for Cartwright King, I will have disclosed
 24 everything that I had appertaining to that case.
 25 Anything above and beyond that I would expect the

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1 comment?
 2 **A.** No.
 3 **Q.** Do you still see it as a fishing expedition in this
 4 particular case?
 5 **A.** Again, as I said, you know, it's -- people sometimes
 6 send emails as if they're having a telephone
 7 conversation and it's probably not the correct word to
 8 use, "fishing", but part of the time it's probably
 9 a prevalent way of people to speak to one another.
 10 **Q.** But do you think that wider disclosure about problems
 11 with the Horizon system experienced by other
 12 subpostmasters is not a reasonable thing to need to
 13 disclose?
 14 **A.** If there was issues there, and the lawyers knew about
 15 it, they should disclose it.
 16 **Q.** You knew about it?
 17 **A.** The lawyers. As I said, I expect the lawyers to do that
 18 not me. I've disclosed all relevant work I had
 19 appertaining to whatever case and the lawyers would deal
 20 with the defence lawyers.
 21 **Q.** Can we please look at POL00059652. We're in 6 February
 22 now, we have an email from Martin Smith of Cartwright
 23 King to yourself. I'm just going to read from this
 24 email. It says:

"The defence were unable to persuade the judge to

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1 lawyers to disclose it to the defence.
 2 **Q.** There's no caveat in that paragraph though, is there?
 3 There's nothing that says in that paragraph "in the
 4 particular circumstances of this particular case"?
 5 **A.** No, and I wouldn't expect there to be any sort of thing.
 6 It's -- you know, any caveat to be put in for there. As
 7 I say, all internal work that I had I would disclose to
 8 our lawyers.
 9 **Q.** All internal work that related to this particular case?
 10 **A.** Yeah.
 11 **Q.** Where did you get the impression from that that's all
 12 you needed to do?
 13 **A.** That's the way I'd been told from the business from when
 14 I started.
 15 **Q.** Told by who?
 16 **A.** The way it's come down from when I started and from the
 17 training school to whoever is sort of like Mr Gardner at
 18 the beginning, when you first done them all -- and the
 19 lawyers. The lawyers haven't said we've done anything
 20 incorrect.
 21 **Q.** So was it part of your training that you only needed to
 22 disclose matters relating to a particular case and not
 23 be concerned with wider issues?
 24 **A.** As far as I recollect, yes. That's what it was.
 25 **Q.** Do you have any reflections on the "fishing expedition"

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1 order any further disclosure.
 2 "The defendant's solicitor told me that the
 3 defendant still operated the store in which the post
 4 office is situated. The defendant had instructed them
 5 that both subsequent subpostmasters had told him that
 6 they had experienced problems with the Horizon system.
 7 Although you have said in your final statement that
 8 'During the subsequent transfer of cash and stock after
 9 Mr Ishaq's suspension in February 2011, no problems or
 10 discrepancies have been reported', the defence may well
 11 suggest that this does not necessarily mean that no
 12 problems were encountered by the subsequent
 13 subpostmasters. I think it would be sensible to obtain
 14 statements from both subsequent subpostmasters
 15 confirming that they experienced no problems with the
 16 Horizon system, et cetera."
 17 Just looking at the words in speech marks that were
 18 in a statement that you had produced for that particular
 19 case -- so you had said in a statement "During the
 20 subsequent transfer of cash and stock after Mr Ishaq's
 21 suspension, no problems or discrepancies have been
 22 reported" -- what investigations at that stage, so prior
 23 to speaking to the subpostmasters, had you conducted in
 24 relation to problems post-dating Mr Ishaq.

A. Sorry, can you repeat that?

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1 **Q.** You subsequently, and we'll see, took a statement from
 2 a subpostmaster that followed from Mr Ishaq's
 3 suspension. You included in a witness statement
 4 a statement to the effect that no problems or
 5 discrepancies have been reported. Now, are we to read
 6 into the fact that you've said "have been reported"
 7 means that, in order to make that statement, all you
 8 looked at was whether a problem or discrepancy had been
 9 reported?

10 **A.** A statement was taken from the interim postmaster who
 11 was -- he had another one in West Yorkshire, in
 12 Dewsbury, and he'd stated in his statement that the
 13 equipment was exactly the same, he hadn't changed
 14 anything, and he had no issues whatsoever.

15 **Q.** We will come to look at that --

16 **A.** That was the statement.

17 **Q.** -- but this particular statement is telling you that we
 18 would like to approach the subpostmasters to take
 19 a statement from them, so this pre-dates that statement?

20 **A.** That's when he's asking me to go down and take the
 21 statement.

22 **Q.** Absolutely but, by that stage, you had already said in
 23 a witness statement that no problems or discrepancies
 24 had been reported subsequent to Mr Ishaq. My question
 25 to you is: how did you form that conclusion?

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1 says:

2 "The call logs for the period of 8 July 2010 to
 3 11 February 2011 were requested from the National
 4 Business Support Centre. Those logs have been examined
 5 and show that no calls were made by Mr Ishaq during that
 6 particular period."

7 If we look over the page, please, and we can see the
 8 line that I've just taken you to, it's at the bottom of
 9 that page, it says:

10 "During the subsequent transfer of cash and stock
 11 after Mr Ishaq's suspension in February 2011 no problems
 12 or discrepancies have been reported."

13 So we have a statement that says, "I have obtained
 14 the call logs from July 2010 to February 2011", and
 15 Mr Ishaq hadn't reported during that period, and then
 16 you have at the bottom that no problems or discrepancies
 17 had been reported. By this particular stage, you
 18 hadn't, in fact, spoken to the subsequent
 19 subpostmasters.

20 **A.** No, that will have been done in the transfer from the
 21 old postmaster to the new postmaster, so, in effect, if
 22 you say there's £10,000 of cash, the incoming
 23 postmaster, Mr Patel, has agreed there's £10,000 of
 24 cash, there's ten stamp books, there's so many of these,
 25 so many of these, he's agreed with everything that's in

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1 **A.** Well, again, I can't say 100 per cent but my knowledge
 2 would have been, at the time, that I would not have
 3 found any issues that he's reported any problems with
 4 the Horizon.

5 **Q.** Is that an assumption?

6 **A.** No, again, without having the case file, you know, and
 7 whether the call logs had been obtained from both the
 8 NBSC and Horizon, but there was nothing at the time to
 9 indicate any issues from Mr Ishaq. You know --

10 **Q.** You said no problems or discrepancies had been reported
 11 and, really, what I'm asking you is: are we to read that
 12 very carefully that you've referred to being reported
 13 because, in fact, you weren't aware whether there were,
 14 in fact, any problems with --

15 **A.** Well, if they're not reported, you know, to me, there's
 16 no issue.

17 **Q.** So you were relying on, for example, call logs or
 18 something along those lines?

19 **A.** Yeah, if --

20 **Q.** Rather than an investigation of the system?

21 **A.** Yeah, if you've got anything to -- because I had no
 22 reason to investigate the system.

23 **Q.** Can we, please, look at POL00059629. We're going to
 24 start at page 14. This is the statement that is
 25 referred to there, and it's a statement from you, and it

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1 the office at that time, so that's what that refers to.

2 **Q.** If we scroll back to the first page please, I just want
 3 to ask you about the call logs that were obtained, it's
 4 page 14. Where you say the call logs were requested
 5 from the National Business Support Centre, we've heard
 6 quite a lot of evidence about the separate Horizon
 7 System Helpdesk. Was that something that you obtained
 8 calls from?

9 **A.** It may well have done, yeah. You know, initially
 10 I thought there was only one and then, as you quite
 11 rightly say, there was a separate Horizon call, and
 12 normally, the National Business Support Centre would get
 13 them call logs, as well, for you.

14 **Q.** You'd have to obtain the Horizon System Helpdesk calls
 15 from Fujitsu --

16 **A.** From Fujitsu, correct.

17 **Q.** You've said that you thought there was only the National
 18 Business Support Centre?

19 **A.** I did at the time, yes.

20 **Q.** For how long?

21 **A.** It was -- afterwards, I would either have been told by
 22 the National Business Support Centre that "We don't have
 23 the Horizon ones, you would have to go to Fujitsu", or
 24 sometimes they have got them on my behalf.

25 **Q.** So are you saying that it was as late as 2013 that you

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1 found out about the other help?

2 **A.** It could well be, yes.

3 **Q.** Thank you, can we please look at POL00059675. Just in
4 terms of the statement that we've just seen, can you
5 assist us? You've said before that Cartwright King sent
6 you a statement to sign. Was that one that we've just
7 looked at? Was that drafted by you or drafted by
8 somebody else?

9 **A.** No, that was drafted by me that one, that wasn't
10 Cartwright King.

11 **Q.** That one was drafted by you, thank you. This is
12 a letter from Mr Ishaq's solicitors and, if we could
13 scroll down, they've picked up on the particular
14 wording, the careful wording, at the end of your witness
15 statement, and they say as follows:

16 "Further to the service of the additional evidence
17 at page 43 Stephen Bradshaw's penultimate sentence
18 states that no problems or discrepancies have been
19 reported since the transfer to a new interim
20 subpostmaster since the suspension of Mr Ishaq in
21 February 2011, with regards to this could you please
22 clarify whether further enquiries were made, ie as
23 [I think it may be 'has'] a full audit been taken since
24 2011 and if so what was the outcome of that audit.

25 "If no discrepancy has been highlighted from
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1 Office.

2 **A.** Well, yeah, but the Post -- you know, you'd have to --
3 the Post Office would have to put another independent
4 audit on. Now, whether that took place, I'm not sure.

5 **Q.** Well, they're only asking a question, aren't they?

6 **A.** Yeah.

7 **Q.** They're saying can you clarify whether further enquiries
8 have been made, ie has a full audit been undertaken?

9 **A.** And I expect they will have been answered by Cartwright
10 King either with help from myself or directly by them.

11 **Q.** Let's have a look, POL00059692, please. It is an email
12 from Martin Smith of Cartwright King, to yourself, and
13 to Mark Ford. He says:

14 "Just to keep you in the loop, please find attached
15 a copy of a letter which we have received from
16 Musa Patel today."

17 That is the letter we have just looked at.

18 "Steve is in the process of taking statements from
19 the subsequent subpostmasters who have not experienced
20 any problems with the Horizon system. They have not had
21 any significant shortages.

22 "I do not propose to ask Steve to obtain the data
23 for the period following Ishaq's removal. Given that
24 there were no problems with the system and there were no
25 significant shortages, it would not assist the defence
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1 a subsequent audit then please be on notice that we will
2 require the data to commission our own audit."

3 So they're asking you there for what further
4 enquiries were made as to the accuracy of the system
5 post-Mr Ishaq and whether an audit has taken place; do
6 you agree with that?

7 **A.** Yes, but I'm not sure whether there was an audit put on
8 by the -- by Post Office, or whether -- technically,
9 what you've got is that each time the interim
10 postmaster, Mr Patel -- every time he balanced, whether
11 it be weekly or the branch trading statements every
12 month, that's actually an audit of what he's got in the
13 branch. I'm not sure if an independent audit took
14 place.

15 **Q.** Mr Ishaq is simply -- his solicitors are simply asking
16 there, could you clarify what further enquiries were
17 made to justify the words that you had included in your
18 witness statement?

19 **A.** As I explained, the interim postmaster has not reported
20 any issues. He's used the same equipment and he's
21 said -- and he's stated, as was put in the statement,
22 that he'd been balancing okay.

23 **Q.** They are effectively trying to test that. They want to
24 test that and they want to see for themselves evidence
25 of the actual figures being looked at by the Post
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1 or undermine the Crown's case."

2 Were Martin Smith or indeed yourself well placed to
3 tell whether there were any problems with the system
4 after Mr Ishaq had been suspended?

5 **A.** As previously explained, you know, the technical issues
6 of the workings of the Horizon System, no, me and
7 Mr Smith would not be. But, based on what they were
8 saying were there any issues with the balancing and the
9 cash and stock that's in the branch at the time, the
10 postmaster that was in place at the time suffered no
11 issues.

12 **Q.** So you have the subsequent postmaster, who you're taking
13 statements from at this time, you've been asked very
14 clearly by the defence whether an audit has taken place
15 because front and centre for their defence is the
16 Horizon system and the reliability of the Horizon
17 system. In what sense are we to understand that
18 Mr Smith has any idea whether obtaining data for that
19 period would have or would not have assisted or
20 undermined the Crown's case?

21 **A.** I think Mr Smith is going -- based on the question, was,
22 you know, the postmaster in post at the time was -- had
23 balanced each and every week, each and every month. So
24 I think Mr Smith has made a decision where, you know,
25 there is no issues shown -- no data would show any loss
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1 because --

2 **Q.** How would you know that without looking?

3 **A.** Because the data is only about the transactions. If

4 you've got the data, all the data would show what

5 transactions you've taken in, so what receipts you've

6 had and what payments you made and if it's balancing,

7 everything is balanced out. The left and right is

8 an equilibrium.

9 **Q.** Can you see any issue with relying on what a subsequent

10 postmaster has told you and not investigating whether,

11 in fact, there were any technical issues?

12 **A.** In this case, no, because he's stated he's balancing

13 okay, and he was an experienced postmaster because he

14 had another branch in Dewsbury. So he was stating he

15 had no issues with his balancing.

16 **Q.** So you don't think it was incumbent upon the Post Office

17 to, in fact, check whether there were or were not bugs,

18 errors or defects affecting Mr Ishaq's Post Office after

19 his termination?

20 **A.** In that particular case, with the postmaster, I don't

21 know what you would expect to find, because he's --

22 everything has gone through correctly.

23 **Q.** Sorry?

24 **A.** Everything has gone through correctly because he has

25 balanced.

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1 accurate and --

2 **A.** Yeah.

3 **Q.** -- full and true?

4 **A.** Yeah, that had come from the training, I'd been taking

5 statements for a number of years and there had never

6 been any issues.

7 **Q.** He said:

8 "I balanced the cash and stock on a weekly basis and

9 produced a branch trading statement at the end of the

10 balancing periods. The weekly balancing and branch

11 trading statement would be done mainly by my son-in-law

12 ..."

13 So I think his evidence was that his son-in-law

14 mainly did the work.

15 **A.** Yeah.

16 **Q.** "... but if he was unable to produce these, either

17 myself or my son would go to [the] Post Office to do the

18 balance.

19 "During my time as interim subpostmaster I did not

20 have any balances that caused me any concern and when

21 the Branch Trading Statement was produced, I cannot

22 recall making good any shortages above £20."

23 So, first of all, are we to read into that that he

24 did have some shortfalls but they just weren't --

25 **A.** It could, yeah -- the way it reads and what he said, he

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1 **Q.** We'll look and see what he says. Let's look and see

2 what he says now. Let's look at UKGI00014921, please.

3 First of all, is this your writing or his --

4 **A.** It is, yeah.

5 **Q.** It's your writing?

6 **A.** Yeah.

7 **Q.** So you took the statement.

8 **A.** Yeah.

9 **Q.** Can you assist us with how you would go about taking

10 statements, focusing on this particular statement?

11 **A.** I'd make the arrangements to go and see Mr Patel and

12 then sort of go through and ask him, as I go through,

13 the questions --

14 **Q.** Is this verbatim as you spoke to him?

15 **A.** I wouldn't say verbatim to the extent of every word but

16 it's the -- what is basically, you know, sort of said to

17 him, and then he would read it and check it afterwards

18 at the end of it, before signing it.

19 **Q.** Let's have a look towards the bottom of the page,

20 please. Just returning to your evidence much earlier

21 today where you said that you signed a statement that

22 Cartwright King had sent you, no questions asked, at

23 this stage, had you had any training or understanding

24 about the duties that relate to the obtaining of

25 statements and how important it was that they were

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1 would have been asked whether he had any surpluses or

2 shortages, and he's come up with the figure of around

3 about the £20. He doesn't -- he can't -- he could not

4 recall any shortage that was above the £20 mark.

5 **Q.** Are we to read anything into the words "I cannot

6 recall"? I mean, why wouldn't he say, "I didn't have

7 any shortages above £20"?

8 **A.** It's probably the way I've written it.

9 **Q.** Yes, because, as you said, it's not verbatim.

10 **A.** It's not.

11 **Q.** Do you think those words were yours or his?

12 **A.** His. You know, he would have been asked -- I might have

13 said to him "Do you recall any shortages?" No, or not

14 above thing, and that's how I've written it. As I said,

15 it's not verbatim saying, "I don't" or "I didn't have"

16 what he's saying there is yeah, he's probably had -- as

17 you've quite rightly said, he's had shortages within the

18 account, however, there's nothing that's caused him any

19 concern because he says it's up to about £20.

20 **Q.** He carries on:

21 "During this time I employed two members of staff

22 ... to work behind the counter. Whilst I was the

23 interim subpostmaster, the Horizon system remained the

24 same. I have never requested any piece of the Horizon

25 kit to be replaced."

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1 Now, why is that bit in capitals, "I have never
2 requested any piece of the Horizon system kit to be
3 replaced"?

4 **A.** It's not really in capitals. It's just the way I've
5 written it.

6 **Q.** But it's different to the rest of the writing.

7 **A.** It's just the way I've written it. You could use other,
8 you know, "the" has come up -- the line above it, which,
9 you know, you haven't picked up is I've got "the" in
10 capitals. It's just the way I've written the statement.
11 There's nothing untoward. It's just the way that
12 statement is written by me.

13 **Q.** Did you see it as an important part of his evidence?

14 **A.** Not at all.

15 **Q.** -- for him to have said that?

16 **A.** Not at all. As I said, it's the way I've written the
17 statement. Sometimes it's in capitals, sometimes it's
18 the way, you know, the shorter notes.

19 **Q.** Was this the sum of the evidence from the subsequent
20 subpostmaster --

21 **A.** All I was asked was to go and get a statement from the
22 postmaster and see whether they had any issues with the
23 system in the Post Office.

24 **Q.** We had read that there were two subpostmasters --
25 subsequent subpostmasters?

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1 that was served on Mr Ishaq?

2 **A.** The other statement might have been served earlier.
3 I do remember, recall that name, Mr Liaquat.

4 **Q.** We will have a look for that additional statement. It
5 then says:

6 "We note that your client has said in his defence
7 case statement that, 'The Post Office Horizon
8 software/hardware system had in the past on numerous
9 occasions malfunctioned causing difficulties in
10 reconciling sales, receipt and stock figures'. Please
11 let us have particular of the numerous malfunctions to
12 which your client has referred."

13 Do you think that was a sufficient response to the
14 various issues that Mr Ishaq had raised with the Horizon
15 system?

16 **A.** As I say, they're the lawyers. They will respond in
17 their way.

18 **Q.** That wasn't really the question I was asking.

19 **A.** No, but they're the lawyers, aren't they? I can't
20 control how they reply to anybody. In this case, I just
21 read that as they're asking for what particular issues,
22 what the malfunction was. That's how I read that.

23 **Q.** As somebody who was the Investigating Officer, the
24 Disclosure Officer, who had been reminded of their
25 duties under the Criminal Procedure and Investigations

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1 **A.** I think Mr Liaquat, is it? I think a statement was
2 taken from him as well.

3 **Q.** Did it say similar things?

4 **A.** I think so. Without seeing it, you know ...

5 **Q.** Is this the sum of this statement, though, that in fact,
6 the author of the statement didn't generally do the
7 weekly balance and branch trading statement. He can't
8 recall making good any shortages above relatively small
9 ones and that he hasn't requested any part of the actual
10 physical kit to be replaced. There was no consequent
11 evidence to this, for example, an investigation of
12 somebody looking at the data during this particular time
13 to see if it was accurate or not?

14 **A.** We had no reason to disbelieve that Mr Patel was not --
15 hadn't checked the work within the post office.

16 **Q.** Can we look at POL00059729, please. This is a letter to
17 Cartwright King, 15 February 2013; this is within
18 a matter of days from the correspondence that we've just
19 seen and it says as follows, it says:

20 "We enclose in duplicate copies of a Notice of
21 Additional Evidence, the statement of Stephen Bradshaw
22 and Abdullah Patel, and an up-to-date page count. There
23 is no further disclosure to be made in this case."

24 Pausing there, it seems as though, in fact, it was
25 only your statement and this statement we've just seen

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1 Act, do you think that that was a sufficient response in
2 the particular case to the serious allegations about the
3 Horizon system --

4 **A.** As I say, that's the lawyers answering that, not me.

5 **Q.** That's not an answer though?

6 **A.** But I don't have any control over what they say.

7 **Q.** You can have a view on what they say and what is your
8 view --

9 **A.** My view on that is I don't see anything wrong with it.
10 They're just asking what the malfunction was on any
11 particular occasion.

12 **Q.** By 2010, we've established, you're aware of all those
13 computer articles, you're aware of a growing body of
14 allegations about the Horizon system, you were aware of
15 the Seema Misra defence expert's report. A whole host
16 of evidence. Do you think that the response in this
17 letter in Mr Ishaq's case was sufficient?

18 **A.** It seems sufficient because they're asking what the
19 malfunction was. So they're just asking what went wrong
20 on a particular occasion. That's how I read that
21 letter.

22 **Q.** Could we keep this letter, please, and can we look at it
23 side by side with POL00059675. This is the letter you
24 received questioning about whether further enquiries
25 were made and whether a full audit had been undertaken

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1 since Mr Ishaq had finished at the Post Office. If we
2 scroll down on the left-hand side you can see. Do you
3 think that letter was sufficiently addressed in this
4 response?

- 5 **A.** As I say, I'm the small cog in this with -- as the
6 Investigation Officer. The lawyers would deal directly
7 with the defence lawyers and it's, you know, is it up to
8 me to sort of say? I don't see anything wrong in what
9 they're replying in the letters.
- 10 **Q.** If we could keep the one on the right-hand side but on
11 the left-hand side can we please put up POL00058254.
12 It's page 4 of that, please, paragraph 11. So if we
13 scroll down, these are all the paragraphs I took you to
14 about all material to the knowledge of the prosecution
15 that reasonably supports the contention that Horizon
16 software/hardware system has proved to be unreliable;
17 full results of any internal investigations, et cetera.

18 I mean, looking at that request that was set out in
19 the defence statement, do you think that that answer on
20 the right-hand side is sufficient?

- 21 **A.** As explained on numerous occasions, I will act on any
22 instructions from the solicitors.
- 23 **Q.** This is 15 February, on the right-hand side, very
24 shortly before the trial; the trial was ten days later.
25 Do you think that that final sentence "Please let us

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1 by that stage?

- 2 **A.** And, as I explained before, as far as I was aware, the
3 Criminal Law Team, Cartwright King are all well aware of
4 this, as you've showed me in previous documents.
- 5 **Q.** Can we please look at POL00059869, this was an addendum
6 defence statement that was filed in Mr Ishaq's case. He
7 there, if we scroll down, responds to the letter
8 requesting further particulars and he has set out there
9 problems:

10 "(i) The Horizon Online system would often crash and
11 freeze and would give inaccurate total figures at the
12 end of trading and/or balance periods;

13 "(ii) As a result of these problems the defendant
14 called the Horizon Helpdesk ..."

15 So this isn't the NBSC, this is the Horizon
16 Helpdesk:

17 "... in the region of 8 to 10 times a month on the
18 telephone number [and then gives a telephone number].
19 Those calls were made over the period of about
20 12 months."

21 He then gives a series of references. If we scroll
22 down, scroll down to the bottom of the second page. It
23 says:

24 "When a balance and/or trading report produced by
25 the system showed there was a shortage of cash, the

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1 have particulars of the numerous malfunctions", placing
2 the burden on Mr Ishaq to identify the malfunctions, do
3 you think that that was an appropriate approach to take
4 so close to the trial?

- 5 **A.** As you're well aware, things go straight on up to the
6 trial day, and sort of thing. As I say, I will act on
7 any instructions from these solicitors. Cartwright King
8 are asking for any malfunctions and, you know,
9 whether -- I don't see anything wrong in that paragraph,
10 as I've said.
- 11 **Q.** You're the Disclosure Officer. You've received
12 a defence statement requesting quite a lot of material
13 relating to the Horizon system. Very shortly before the
14 trial, the answer is "You're not getting anything else,
15 please let us know what you say the problems are". Do
16 you see a problem with that?
- 17 **A.** That's from the lawyers. As I've explained previously,
18 I will disclose all information I have, and Cartwright
19 King in this case, they're the ones who deal directly
20 with these defence solicitors and, if any information is
21 required, I will assist Cartwright King in obtaining the
22 information on their instructions.
- 23 **Q.** One thing that you haven't passed to them is wider
24 knowledge of problems with the Horizon system that's
25 been passed to you over the many years in post, 13 years

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1 system would give the defendant an option to make good
2 the discrepancies."

3 If we scroll down:

4 "On occasions the defendant did not accept that he'd
5 made an error and requested the issue be dealt with
6 centrally by the Post Office. On such occasions he
7 received a letter from Chesterfield.

8 "Approximately twice the defendant called
9 Chesterfield to discuss the discrepancies and shortfalls
10 and in order to explain the problems he was encountering
11 with the system. No references were provided by
12 Chesterfield staff but he was assured that the matter
13 would be investigated."

14 Then he gives some further details.

15 Could we please turn to POL00166405. This is
16 an email from Martin Smith to yourself. He says:

17 "Please find attached a letter which we have
18 received from Messrs Musa Patel today enclosing
19 an addendum defence case statement."

20 That's the document we've just been looking at:

21 "I note that the Addendum Defence Case Statement
22 sets out the reference numbers of numerous reports which
23 the defendant apparently made. It is the last working
24 day before the trial and I am somewhat suspicious that
25 the information was not disclosed at an earlier stage.

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1 Steve, could you please go through the Addendum Defence
2 Case Statement and make such enquiries as you are
3 able to today."

4 Just pausing there, we saw the letter which asked
5 for further information. The Addendum Defence Case
6 Statement seems to have been submitted in response to
7 that letter. Were you suspicious about the detail that
8 was provided in that defence statement?

9 **A.** Sorry, can you just clarify that? I'm not quite sure.

10 **Q.** Yes, we've seen an additional addendum statement, giving
11 more detail. Were you, as Mr Smith seems to have been,
12 suspicious about the production of that defence
13 statement?

14 **A.** Well, in the addendum, these ones there's ones there
15 where the Horizon reference numbers are -- sort of
16 thing.

17 **Q.** Yes.

18 **A.** So that possibly indicates that the Horizon call logs
19 were obtained from Fujitsu, hence, why the -- you know,
20 you've got the reference numbers and what have you.

21 **Q.** Sorry, we'll get to the investigation into the
22 information that he gave.

23 **A.** Yeah, in terms of -- and, you know, from that statement,
24 you know, again, that's an instruction and I've -- I'm
25 dealing with whatever he wishes me to sort of go on.

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1 conversation that went on at that time with Cartwright
2 King over that.

3 **Q.** Well, do you recall any conversation in which that was
4 challenged, in which --

5 **A.** It's ten plus years ago.

6 **Q.** Do you really think you did have a conversation with
7 Cartwright King?

8 **A.** I had numerous conversations with Cartwright King over
9 the years. So whether that was part of one of them,
10 I -- it's 10 years. I can't honestly say, "Yes, I spoke
11 to them about Mr Ishaq" or "I spoke to them about this".
12 Unfortunately, that's just the passing of time with that
13 one.

14 **Q.** So your evidence is you can't remember?

15 **A.** In this particular -- yeah, I can't remember whether any
16 conversation took place regarding that. I'm not saying
17 it didn't but, on the same token, I can't say it did.

18 **Q.** Do you think it's likely that, if you had received this
19 and had an objection to their approach to disclosure,
20 you might have written it down?

21 **A.** Something will -- may well have been said, yeah,
22 regarding it.

23 **Q.** Do you think it was?

24 **A.** As I say, I can't categorically say it did or it didn't.

25 You know, it's likely to have taken place. If you've

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1 And again, you know, that's a decision he's made about
2 whether -- unsuccessful challenge. I can't say what
3 type of conversation went on with Mr Smith regarding
4 whether they should tell or shouldn't tell.

5 **Q.** Did you have any suspicions about the information that
6 was provided?

7 **A.** No.

8 **Q.** No.

9 **A.** I would look at the information that's received.

10 **Q.** If we scroll down, in this email, he says as follows, he
11 says:

12 "I have no intention of providing details of
13 previous cases in which there has been an unsuccessful
14 challenge to Horizon. That information does not
15 undermine the Crown case or assist the defence."

16 Now, your evidence throughout today has been that
17 you relied on Cartwright King to disclose that
18 information.

19 **A.** That's right.

20 **Q.** Here you're being told by Cartwright King that they're
21 not going to be providing that information. Did you
22 have any concerns about the approach that they were
23 taking?

24 **A.** At the time, probably not. You know, as I say, I can't
25 really answer because I don't know the type of

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1 got an unsuccessful challenge and saying "I'm not going
2 to deal with it", the passing of the conversation would
3 have been "Well, why not?" sort of thing. They're
4 making the choices as the lawyers.

5 **Q.** Did you not see as Disclosure Officer the duty falling
6 to you to make the --

7 **A.** As I say, I disclose everything what I've got from the
8 Post Office side of the investigation. Everything else
9 after that for disclosure is done by Cartwright King to
10 the defence.

11 **Q.** Could we please look at POL00046280. Here we have you
12 chasing up some of the references. If we could look at
13 page 3, please. These are chasing up some of those
14 references that are in Mr Ishaq's defence statement.
15 The bottom email is from you. Sorry, its -- yes, it's
16 from you, and it says -- sorry, is that the final page?
17 Can we go over the page? I think there's one more page.
18 Thank you.

19 "Please see below from Steve Bradshaw ..."

20 That's forwarding your email:

21 "Fujitsu advise that a request for the HSD call logs
22 for the branch need to go via our Security team into
23 theirs."

24 So there needs to be a conversation between
25 yourselves and Penny Thomas and Andrew Dunks.

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1 "Would it be possible for you to progress this and
2 have the logs sent to Steve Bradshaw?"

3 If we go to the page before we have an email from
4 you, that says as follows:

5 "I have been speaking with Julie who tells me that
6 NBSC call logs begin with the letter H and Fujitsu call
7 logs begin with the letter A.

8 "Sorry to be a pain but can you identify the
9 following reference numbers and what problems they
10 relate to?"

11 If we go to the first page, we see there an email
12 from the Post Office Service Desk saying that they've
13 checked, they've had problems locating those particular
14 references, and the email continues:

15 "The only remaining alternative is to run all
16 incidents logged at the NBSC for each month of the date
17 ranges given in the hope that they're listed somewhere.
18 I have been processing your request since 2.00 ..."

19 This email is indictment at 4.14, so for 2 hours 16
20 minutes:

21 "... this afternoon and have yet to successfully
22 extract a monthly report due to the volume of calls."

23 So there is obviously a very high number of calls
24 being made to the NBSC during this period:

25 "Without further clarification of branch code or the
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1 **Q.** Did you have direct contact with Mr Jenkins?

2 **A.** I don't recall any direct contact. I've met him on
3 a couple of occasions and I think this was one occasion
4 in Bradford Crown Court when he was listed for witness.
5 At the most I've met him about once or advice, and no
6 real -- no telephone conversations with him.

7 **Q.** He says there:

8 "I have been asked to comment on the Addendum
9 Defence Case Statement in the case of Mr Ishaq."

10 If we scroll down we can see his comments. So
11 there's a section there, "The Horizon Online system",
12 and this is in the defence statement. It says:

13 "The Horizon Online system would often crash and
14 freeze and would give inaccurate total figures."

15 He says as follows, he says:

16 "I am aware that there were some issues in the early
17 days of Horizon Online however I don't believe these
18 impacted the overall accounting at the end of the
19 periods provided recovery was carried out correctly."

20 So that's somewhat caveatted: provided recovery was
21 carried out correctly, it shouldn't have impacted on the
22 figures. He says:

23 "The migration date was well into the full rollout
24 and the branch was not operating Horizon Online during
25 the pilot."

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1 correct dates this request becomes considerably more
2 complex."

3 So it seems as though the Post Office themselves are
4 not having much luck in finding these calls; is that a
5 fair summary?

6 **A.** Well, it indicates that I've done on behalf of what the
7 defence requested and what Martin Smith is instructing
8 me to do so, that I've (*unclear*) and then they're
9 struggling because the numbers aren't correct.

10 **Q.** And that further work is complicated or complex, as
11 they've described?

12 **A.** Yes, and that would be trying to associate the numbers.
13 If the number's incorrect, you're trying to balance the
14 number out of when were the dates and the number into
15 the call centre.

16 **Q.** Do you remember any conversation that you had with the
17 Horizon Helpdesk team?

18 **A.** Normally, everything for Horizon always went through the
19 Security Team, the Casework Team. We were not called
20 directly.

21 **Q.** Could we look at POL00059861. This is the same day and
22 it's comments received from Mr Jenkins on the Addendum
23 Defence Statement. Do you recall Mr Jenkins'
24 involvement in this case?

25 **A.** I know Mr Jenkins, yeah. I know of him.

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1 If we scroll over the page, he then addresses all of
2 those reports and he says as follows, just below, if we
3 scroll down slightly. He says:

4 "I have no easy visibility of these reports. It is
5 possible to retrieve them from the system and examine
6 them but I'm not aware of them having been provided in
7 evidence. I have certainly not been asked to examine
8 them but I am happy to do so. If the details of the
9 reports have not yet been provided then there is
10 a process to ask for them to be provided by Fujitsu."

11 He says:

12 "I am checking to see if these reports have been
13 retrieved and submitted as evidence. If so I'll try and
14 get hold of them. However as the period of the calls
15 outlined above has little overlap with the period for
16 which detailed transaction logs have been obtained, it
17 is likely that there is not much that can be done to tie
18 them together without getting more information."

19 Can we now turn to FUJ00153997, please. We have
20 an email from Gareth Jenkins to the Legal Team. He
21 says:

22 "Thanks for the update [on another case]."

23 He says:

24 "I've added some comments to the Defence Case
25 Statement Addendum ..."

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1 That's the comments that we've just seen. He
 2 says:
 3 "I have now had confirmation that Fujitsu have not
 4 supplied details of any Helpdesk calls to Post Office
 5 Limited regarding this branch. Therefore, there is
 6 nothing I can easily do to address any specifics."
 7 The suggestion there is that the call logs and
 8 Fujitsu have not been obtained at this point.
 9 **A.** That's a possibility but I've never seen that email.
 10 It's -- I'm not on it. It's got --
 11 **Q.** You yourself didn't have any contact with Fujitsu --
 12 **A.** No.
 13 **Q.** -- requesting the call logs?
 14 **A.** No.
 15 **Q.** What do you recall you did once you received the defence
 16 statement, in terms of investigating underlying issues
 17 with the Horizon system?
 18 **A.** As I've explained, when the defence, any defence
 19 statement comes, I will act on any instructions from, in
 20 this case, Cartwright King. Whatever work they want to
 21 do.
 22 **Q.** Total reliance on Cartwright King?
 23 **A.** On Cartwright King, what they want doing. I wouldn't go
 24 off on a tangent to go to do my own investigation.
 25 **Q.** We have, as we've seen, the 2009 media articles, Seema

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1 This is the opening note from counsel for the
 2 prosecution in Mr Ishaq's case. Could we please look at
 3 page 5., paragraph 19:
 4 "That being the case it may be that the defendant
 5 will accept responsibility for the transactions but
 6 claim that there is some sort of problem with the
 7 Horizon system. If so he has yet to produce any
 8 evidence to demonstrate that is so. The Crown will call
 9 evidence from the designer of the system to prove that
 10 there is no fault in the system at all."
 11 Do you think that that was accurate?
 12 **A.** That's their advice. As I've said numerous times, you
 13 know, as Mr Ishaq was asked for, what was the
 14 malfunction? That's the advice from the lawyers, and
 15 I am assuming that the last bit, "The Crown will call
 16 evidence from the designer", they're referring to
 17 Mr Jenkins.
 18 **Q.** He would say there is no fault in the system at all?
 19 **A.** That's their opinion.
 20 **Q.** We're now in 2013. You had all those years of
 21 complaints about Horizon. All that evidence put before
 22 you relating to problems with Horizon. Were you in
 23 court hearing the opening?
 24 **A.** I was in court for that because I was called as
 25 a witness.

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1 Misra report, growing cases challenging Horizon, by this
 2 time Second Sight's involvement. Were you not concerned
 3 that there was more investigation that should be carried
 4 out in relation to --
 5 **A.** And that would be done by the relevant people, not me as
 6 the individual.
 7 **Q.** Were you asking anybody to carry out a greater
 8 investigation?
 9 **A.** I would not ask because, again, when the Second Sight
 10 and everything come on board, the business as the Post
 11 Office would have instructed people or put people in
 12 place to do that, not me as the individual.
 13 **Q.** But you were the Investigator?
 14 **A.** That's correct, yes, and, as I've explained, I will have
 15 passed over everything I had in my possession to the
 16 lawyers --
 17 **Q.** Disclosure is one thing but you were the Investigator.
 18 Were you not investigating the Horizon system?
 19 **A.** I would not be investigating everything. The Horizon --
 20 I'm not technically gifted to investigate any errors
 21 within the -- any technical issues within the Horizon
 22 system. That would be done by other people within the
 23 business.
 24 **Q.** Before we break for lunch, I'd like to take you to the
 25 opening note in the Ishaq case. That's at POL00059890.

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1 **Q.** You heard the words being said, that the claim is that
 2 there is some sort of problem with the Horizon system.
 3 If so, he has yet to produce any evidence to demonstrate
 4 that is so.
 5 **A.** I --
 6 **Q.** Were you not a bit worried at that stage?
 7 **A.** I was in court on the day. I was not in the actual
 8 court when the trial begins because I was a witness, so
 9 I would be outside.
 10 **Q.** But knowing that was how the prosecution was putting
 11 their case, were you not a bit nervous?
 12 **A.** As I said, I was outside the court waiting to be called
 13 as a witness.
 14 **Q.** Paragraph 20:
 15 "The defendant was suspended from his duties at the
 16 Birkenshaw post office and a new subpostmaster was
 17 introduced in his place, Abdullah Patel. For more than
 18 a year he has run the post office and in that time there
 19 have been no problems reported at all, no unexplained
 20 Horizon malfunctions, no stock discrepancies requiring
 21 huge reversals, no mysterious disappearances of cash."
 22 I think we did hear/did read in Mr Patel's statement
 23 that at least there were some discrepancies, weren't
 24 there?
 25 **A.** In Mr Patel's words, there were minor and I think most

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1 postmasters would say they had minor discrepancies.
 2 **Q.** Do you think the summary of the position that's the
 3 being put in these paragraphs is a fair summary --
 4 **A.** That's the advice --
 5 **Q.** -- having, for example, not investigated the underlying
 6 issues with the Horizon system.
 7 **A.** As I said, Cartwright King, that's their advice and
 8 that's what they put for the courts.
 9 **Q.** You were a witness in that case and you provided
 10 a witness statement in that case?
 11 **A.** That's right.
 12 **Q.** Were you not at all concerned, in 2013, about the state
 13 of the Horizon system?
 14 **A.** I gave my evidence and I was cross-examined by the
 15 defence and nothing untoward come from it.
 16 **Q.** There was something untoward. There was a prosecution,
 17 a conviction and then a subsequent successful appeal.
 18 **A.** That's from now. At the time of the case, when I gave
 19 my evidence, nothing -- nothing untoward come back to me
 20 in 2013 from the defence, when cross-examined.
 21 **MR BLAKE:** Thank you.
 22 Sir, might that be an appropriate moment to take
 23 lunch?
 24 **SIR WYN WILLIAMS:** Yes, of course.
 25 **MR BLAKE:** Thank you.

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1 "On 13 May, Ms Sefton was sentenced to six months'
 2 imprisonment suspended for 12 months. Ms Nield was
 3 sentenced to five months' imprisonment which was also
 4 suspended for 12 months."
 5 If we scroll down to paragraphs 27 and 28, please:
 6 "The Post Office audited the branch on 6 January
 7 2012. During the audit, 40 giro deposit slips and
 8 number of cheque envelopes were recovered from
 9 a cupboard which showed suppressed deposits in the sum
 10 of £34,000. Ms Sefton and Ms Nield handed the auditor
 11 a jointly signed letter in which they said they had
 12 tried to repay shortages by using their own credit cards
 13 and holiday money. They eventually ran out of funds.
 14 As a result they began to cover up shortages by delaying
 15 the processing of business deposits to Santander and one
 16 other bank. They cannot explain the shortages. They
 17 had reached 'breaking point' in that their lives and
 18 health had been deeply affected.
 19 "On 20 January 2012 Ms Sefton and Ms Nield were each
 20 interviewed. Ms Sefton said they had only ever delayed
 21 payments and never withheld them. Animals In Need had
 22 been significantly affected ..."
 23 If we scroll over the page. It says:
 24 "She and Ms Nield did not report the losses because
 25 they were too terrified. It appears that Ms Nield gave

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1 **SIR WYN WILLIAMS:** 2.00?
 2 **MR BLAKE:** Yes.
 3 **SIR WYN WILLIAMS:** Fine.
 4 (12.57 pm)
 5 (The Short Adjournment)
 6 (2.02 pm)
 7 **SIR WYN WILLIAMS:** Over to you, Mr Blake.
 8 **MR BLAKE:** Thank you, sir. Moving on to the case of Angela
 9 Sefton and Anne Nield, can we please look at
 10 POL00113343, please. This is returning to the Court of
 11 Appeal but now we're in a different Court of Appeal
 12 case, in the case of *Roger Allen and Others*, could we
 13 please look at paragraph 23. It's on the fourth page.
 14 If we scroll down, we can see the cases of Angela Sefton
 15 and Anne Nield, paragraph 23. Thank you very much.
 16 I'm going to again read briefly from the transcript,
 17 to refresh our memory as to this case.
 18 "On 11 April 2013, the Crown Court at Liverpool,
 19 Angela Sefton and Anne Nield each pleaded guilty to one
 20 count of false accounting with which they were jointly
 21 charged. The allegation against them was in short that
 22 between 1 January 2006 and 6 January 2012, they had
 23 falsified giro deposit entries on Horizon in relation to
 24 the receipt of £34,000 in donations made to the charity
 25 Animals In Need.

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1 a broadly similar -- or at least consistent -- account.
 2 She said she did not know where the shortages were
 3 coming from.
 4 "Both submitted defence statements which questioned
 5 whether the losses were genuine or Horizon generated.
 6 They requested relevant disclosure and access to Horizon
 7 for the purposes of examination by a forensic
 8 accountant. Solicitors on behalf of the Post Office
 9 asserted that material relating to Horizon was not
 10 disclosable because the case turned on the deposit slips
 11 which formed no part of Horizon.
 12 "Ms Nield repeated the disclosure request with the
 13 result that the Post Office agreed that a defence expert
 14 should be allowed to attend the branch to analyse the
 15 data. The Post Office served a witness statement by
 16 Gareth Jenkins in which he maintained that there was no
 17 problem with Horizon.
 18 "Call logs show that some difficulties with Horizon
 19 had been sporadically reported to the Post Office
 20 between 2005 and 2011. Other records show numerous
 21 difficulties with Horizon in 2009.
 22 "The Post Office accepts that this was
 23 an unexplained shortfall case and that evidence from
 24 Horizon was essential to the prosecution of both
 25 Ms Sefton and Ms Nield. Post Office failed to carry out

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1 a proper investigation into Horizon issues, and failed
2 to disclose full call logs and other records indicating
3 that there had been problems with Horizon at the branch.
4 In addition, Mr Jenkins had informed the Post Office
5 solicitors that he had 'no information regarding
6 complaints or investigations into Horizon, and it has
7 already been established that it's not possible to
8 examine the original Horizon system that was operational
9 until 2010. Similarly, I have not been presented with
10 any audit data relating to any of these cases to
11 examine'. These defects in Mr Jenkins' evidence were
12 not disclosed. Nor were two earlier relevant reports
13 disclosed.

14 "In those circumstances, the Post Office accepts
15 that their prosecution was unfair and an affront to
16 justice."

17 Can we, please, look at POL00328743. This is the
18 audit report into their branch, the Fazakerley branch,
19 and it says as follows:

20 "Fazakerley is a busy branch in the suburbs of
21 Liverpool. We have visited this branch more than any
22 other branch during the last few years and always find
23 it to be well run and welcoming. On 6 January 2012,
24 accompanied by my colleague Richard Cross, I conducted
25 an audit of the above named branch. Also present were

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1 "We arrived at the branch at 8.15 am and introduced
2 ourselves to a member of staff on the shop counter, she
3 referred us to the Post Office Counter where a member of
4 staff was sat in the dark behind the counter. I knew
5 this was one of the members of staff I had previously
6 met but she was not her normal welcoming self. The
7 other members of staff arrived at 8.45 am and she was
8 slightly upset. As I had very little information of why
9 we were completing an audit so soon after a similar
10 audit, I told them that and advised that we were there
11 to perform an audit on behalf of the Post Office. They
12 told me that they knew why the audit was happening and
13 that they were sorry for causing us problems and sorry
14 for misleading us at previous audits (there were
15 tears)."

16 Do you remember them being in tears when you were
17 there?

18 **A.** No, I don't recall them being in tears at all.

19 **Q.** Do you remember them being upset?

20 **A.** I would say that they didn't seem particularly upset.

21 They had contacted me, even on the day of the audit,
22 Ms Sefton phoned me to inform me the Auditors were there
23 and I told her that I was coming down to the branch
24 shortly.

25 **Q.** Do you have any reason to doubt what the Auditors are

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1 Steve Bradshaw and Kevin Ryan from the Security Team."

2 Just pausing there, we have two Auditors, two
3 Investigators, arriving at the branch on 6 January 2012.
4 Why was it necessary for four people to attend that
5 branch?

6 **A.** The audit was put on -- the Auditors arrived before
7 that. Me and Mr Ryan, we attended because the audit had
8 been put on because Ms Sefton previously telephoned me
9 to say that she wanted to speak to me and that's why we
10 attended. It's normal for the Auditors to attend to
11 audit the branch while we looked into this customer
12 complaint from the Animals in Need charity.

13 **Q.** So is it normal for four individuals to attend what is
14 a relatively small branch?

15 **A.** We were there to do the -- two were there to do the
16 audit, we were there for the enquiry regarding the non
17 sort of -- the cash deposit slips that weren't being
18 credited to the customer account.

19 **Q.** It says:

20 "This was a special request audit by the Security
21 Team and the purpose of this audit was to verify
22 financial assets due to the Post Office.

23 "The audit revealed a surplus in the branch",
24 et cetera.

25 If we go over the page, it says:

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1 reporting there?

2 **A.** When they arrived no, I had no reason to doubt what they
3 said.

4 **Q.** "At around 11.00 am Steve Bradshaw asked us to check
5 around the branch as the staff had told us had they had
6 concealed some Transcash paperwork in the cupboards. We
7 spent about 10 minutes looking but couldn't find
8 anything. One of the staff members was led through the
9 secure area and immediately located the paperwork which
10 she handed to Steve Bradshaw.

11 "The staff agreed to leave with the Security Team
12 and before they left they were allowed to collect any
13 personal items from behind the counter. Again, they
14 apologised and said sorry for all they had done and that
15 they felt terrible."

16 Was that your recollection as well, that they were
17 apologising and felt terrible.

18 **A.** Yes, Ms Sefton and Ms Nield apologised sort of all the
19 way through. It was Mr Ryan who went with Ms Nield to
20 recover the deposit slips, and they brought them back.
21 He counted them up and there was 40 that was, give or
22 take a bit, the £35,000.

23 **Q.** Is this, again, a case where you were the Leader
24 Investigator?

25 **A.** Yes.

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1 Q. Can we please look at POL00328734, please. The second
 2 email on the page is an email from yourself to
 3 Andrew Bolc, I believe he was -- we've heard from him.
 4 He was a lawyer at Cartwright King. You say as follows:
 5 "On another point, regarding the case of *Bramwell*,
 6 has the court decided anything regarding the trial date?
 7 Also in light of the Post Office instructing independent
 8 experts to look at the Horizon system, would this have
 9 any bearing on the case? The reason I ask is that one
 10 of the witnesses would like to book some leave and the
 11 date in question is 13 August?"
 12 Is this is an email in the context of the case of
 13 *Sefton and Nield* but you're referring to another case,
 14 the case of *Bramwell*, and you're raising the issue of
 15 independent experts having been appointed. Is that
 16 Second Sight?
 17 A. It probably would have been at the time. The *Bramwell*
 18 one was -- is a case that was allocated to the South
 19 Team and there was a big change in the South Team, when
 20 most of them left and I ended up with their cases.
 21 I was not involved in any of the interviews or the
 22 investigation of the South Team ones but I had to liaise
 23 with the solicitors and the court to follow the due
 24 process.
 25 Q. But, as at June 2012, you were aware that the Post
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1 sort of like a liaison for these, everything would sort
 2 of go in and I just say yes. To me it shows that
 3 Mr Bolc knew about the issues and should have taken it
 4 up accordingly, if he felt.
 5 Q. But it also shows that you were aware of a corporate
 6 position, a particular line that's being taken by the
 7 Post Office?
 8 A. He's informed me but, as I say, these are all cases that
 9 were well ongoing and I was just a liaison man to sort
 10 out the very end. If the South Team hadn't have
 11 changed, then emails wouldn't have been -- wouldn't have
 12 even been on there.
 13 Q. Mr Bradshaw, you weren't a liaison man, you were the
 14 Investigator charged --
 15 A. I was.
 16 Q. -- with investigating the *Sefton and Nield* case?
 17 A. Yeah, correct, *Sefton and Nield*.
 18 Q. So, at this particular time, you were investigating
 19 a particular case, in relation to discrepancies on
 20 Horizon, and you were aware that there was a Post Office
 21 line that is that the system is a robust one?
 22 A. In there but also, as I said before, about taking into
 23 context, the context of this one was to do with
 24 people's -- whether they be a private individual,
 25 a business, the treasurer of a charity, this was all to
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1 Office had instructed independent experts to look at the
 2 Horizon --
 3 A. Which is Second Sight, yes, I think.
 4 Q. If we scroll up to the response from Mr Bolc, he says,
 5 in the context of this particular case "John is away",
 6 and he gives you certain weeks, dates to avoid, et
 7 cetera. Then he says:
 8 "My understanding is that the Post Office line
 9 remains that the system is a robust one. The defence
 10 could presumably raise the issue but have not done so
 11 yet. Do we know when the review is going to conclude,
 12 as this could affect a judge's decision to adjourn for
 13 this reason."
 14 Mr Bolc is there saying that that is the Post
 15 Office's line. That's not particularly reassuring, is
 16 it, in terms of the --
 17 A. Crawley(?) -- and he would be more likely to know when
 18 the review would conclude rather than myself.
 19 Q. But in terms of the reference to the Post Office line
 20 and an email to yourself, did that cause you any concern
 21 that it seemed to be a line coming from the Post Office,
 22 rather than, in fact, the correct position?
 23 A. Yeah, as I say, that's come from them. I was just at
 24 the very end of the Bishops Hull, the *Bramwell* case, the
 25 one underneath the London Road, Sunningdale. I was just
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1 do with cash deposits not being credited to that
 2 person's account. That's the enquiry I was looking
 3 into.
 4 Q. But weren't you also looking into the fact that these
 5 people were complaining, concerned, in tears, et cetera,
 6 that they had discrepancies that they couldn't account
 7 for?
 8 A. As I said, there was no tears. Ms Sefton handed me
 9 a note on the morning explaining fully what they had
 10 done, how they withheld the giro slips. They withheld
 11 them ones because they were the last, I think, business
 12 where they used deposit slips. My enquiry to look into
 13 was the non-credit of giro -- of people's cash deposits.
 14 Q. We have an audit report that says they -- it's always
 15 been a well-run and welcoming branch. You have the
 16 subpostmistresses, assistants, et cetera, very concerned
 17 about a discrepancy. You have Second Sight carrying out
 18 their investigation at this particular time. Did you
 19 not think to yourself "Maybe I should think about wider
 20 problems with the Horizon system"?
 21 A. If they've shown all paperwork is correct in the
 22 balance, like there the balance -- the balance is
 23 correct, they showed the surplus of £559 but, in
 24 reality, it should have been £34,000 short, if them
 25 deposits had gone through. If it's not reported, it's
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1 very difficult to try and find something that isn't
 2 there.
 3 **Q.** But their very case was "We have these discrepancies, we
 4 don't know how they're arising, we've had to cover them
 5 by delaying those other payments"?
 6 **A.** That's what they've said in their mitigation of why --
 7 of --
 8 **Q.** It's not mitigation though, it's actually --
 9 **A.** It is.
 10 **Q.** -- their account.
 11 **A.** No, in there, that enquiry was about the non-credit of
 12 the deposit slips. That's what I looked into initially.
 13 Any losses that they didn't -- they couldn't tell me
 14 "I lost money this time and I lost money that time".
 15 They did bring up in interview where it's something to
 16 do with a £4,000 also but that was something between
 17 them and the postmaster, some five years earlier.
 18 **Q.** If you were told, as at 2012 that there was a software
 19 bug that caused a significant discrepancy in their
 20 account and you had been told by them that they had been
 21 trying to cover that up would you still have prosecuted
 22 them?
 23 **A.** They were prosecuted for the giro deposit slips not
 24 going in.
 25 **Q.** If you were sure that the underlying problem was a bug,
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1 Horizon?
 2 **A.** That's -- as I said, not in this case. This case was
 3 solely that they did not credit somebody's deposit. You
 4 as an individual, me as a business, or somebody else as
 5 a treasurer, they'd made the complaint saying "I'm
 6 paying money to a Post Office and it's not in my
 7 account". That's what was looked into on this occasion.
 8 **Q.** Can we look at POL00044036, please we've seen defence
 9 statements in other cases. This is the defence
 10 statement in Ms Sefton's case. This produced by her in
 11 the criminal proceedings that were brought against her.
 12 Can we please look at paragraph 5, it's on the first
 13 page, the bottom of that page, please. 18 July 2012,
 14 she says as follows:
 15 "The defendant asserts that significant
 16 shortages/losses had been a common experience in the
 17 past. Losses started to occur from 2005. The defendant
 18 had to make good a great deal of those losses out of her
 19 own pocket, but as the losses increased the defendant
 20 could not afford to repay them from her own resources."
 21 Over the page, if we could scroll down to
 22 paragraph 11:
 23 "The defendant also prays in aid of her defence the
 24 fact that the Post Office's computer system known as
 25 Horizon installed sometime in 2005 has been the subject
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1 error or defect in the Horizon system that caused that
 2 discrepancy, would you still have prosecuted them
 3 for covering that up?
 4 **A.** That's not my decision, that decision would be made by
 5 the Criminal Law Team or Cartwright King.
 6 **Q.** Did you not think that was something worth
 7 investigating?
 8 **A.** Not in this inquiry. This inquiry was solely about the
 9 non-receipt -- sorry, the non-credit of people's money
 10 being paid into their account, which, ultimately, caused
 11 the charity to have difficulty with their cash flow
 12 problems. That's the inquiry I looked at.
 13 **Q.** Did you not think about looking into the reasons for
 14 that discrepancy?
 15 **A.** This discrepancy was quite simple: they did not -- when
 16 the customer come in to deposit money, they did not
 17 deposit the money. That was the inquiry. Whatever
 18 happened before, as I say, to use the word "mitigation",
 19 they haven't brought up to say "This happened on this
 20 day", they just said they were covering up losses but no
 21 substantiation with it. The inquiry was solely about
 22 the non-credit of people's money.
 23 **Q.** You were aware that an important part of their case in
 24 the criminal proceedings was that the underlying
 25 discrepancy was caused by bugs, errors or defects in
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1 of criticism in the press. A firm of solicitors in the
 2 Midlands, Shoosmiths, are acting on behalf of 100
 3 subpostmasters, who in the past have wrongly been
 4 accused of fraud and false accounting and have been
 5 compelled by the Post Office to repay significant sums
 6 of money or face criminal prosecution presumably. At
 7 the heart of their complaint is the fact that the
 8 Horizon computer system is to blame for these apparent
 9 losses due to some form of technical malfunction."
 10 They continue down the page, at the bottom:
 11 "They seek details of any complaints made to the
 12 Post Office regarding the operation of the Horizon
 13 computer system from 2005 onwards, and details of the
 14 steps taken to deal with those complaints."
 15 Over the page, please, paragraph 4:
 16 "It is believed that certain Members of Parliament
 17 have become involved on behalf of their constituents and
 18 possibly on behalf of complaining subpostmasters
 19 generally in connection with the apparent problems
 20 arising out of the Horizon computer system, and
 21 therefore disclosure is sought of a list of those MPs.
 22 This would be of great assistance in enabling the
 23 defendant, through her solicitor, to contact them and
 24 obtain further information as to the present state of
 25 play in the investigation of those complaints by senior
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1 officials in the Post Office."

2 I'm going to take you now to Ms Nield's defence
3 statement, that is at POL00044042. At the bottom of
4 this first page, Ms Nield says as follows:

5 "The defendant accepts that the losses were shown on
6 the Horizon computer system from 2005. The defendant
7 does not know how the losses were incurred. The
8 defendant now believes that such losses may have shown
9 as a result of failures in the Horizon computer system."

10 If we scroll over the page there's a request for
11 disclosure.

12 "The defendant requests disclosure of the following

13 ...

14 "(c) Details of complaints and investigations into
15 the Horizon computer system."

16 Could we please turn to POL00058300. It's page 8
17 that I'd like to look at. Is it fair to say that, from
18 those defence statements that we've seen, the Horizon
19 system, the reliability of the Horizon system, was front
20 and centre of their defence?

21 **A.** That's what they're indicating but, however, they
22 weren't having permanent shortages because the audit
23 showed a surplus and, as I've explained, this inquiry
24 concerned the non-credit of deposit slips. That's the
25 initial inquiry what we'd were looking at.

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1 **A.** Again, they're saying they've had that but they've still
2 committed that offence of not crediting the giros.

3 **Q.** For you, the reasons for the discrepancy was simply
4 irrelevant?

5 **A.** No, not at all. They say it's losses but it's very
6 difficult to try and find the losses. They make the
7 paperwork and the accounts look correct, as was shown on
8 the audit done on the day, that was £550 surplus.

9 **Q.** One of the aspects, one of the things that people will
10 think about when they're deciding whether to charge
11 somebody with a criminal offence is the public interest
12 in pursuing that charge. Do you think the reliability
13 of the underlying system that causes a discrepancy of
14 a significant value, do you think that is important for
15 considering the public interest in pursuing a criminal
16 allegation?

17 **A.** The public interest in this case is that a charity did
18 not get credited with nearly £35,000 of people's money
19 that they'd donated to it.

20 **Q.** You can close your eyes entirely to the reason for that?

21 **A.** That's their rationale but it doesn't affect that
22 inquiry of the charity not being credited with £35,000
23 over a period of time.

24 **Q.** Did you see any burden on yourself as the Investigator
25 to pursue those lines that had been raised by the

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1 **Q.** So you didn't think that it was necessary to look beyond
2 your case and look at their defence, and look at the
3 allegations they had made about the Horizon system and
4 provide them with disclosure as to issues with the
5 Horizon system?

6 **A.** I can't explain it any other way. The inquiry was not
7 the non-credit of people's cash deposits. The other is
8 a second issue of why they committed that offence.

9 **Q.** And, for you, that didn't matter?

10 **A.** I'm there to gather the evidence and pass it to the
11 solicitors. They still committed the offence.
12 Ms Sefton gave me a note explaining fully what they'd
13 done, why they'd done it.

14 **Q.** Did you consider it necessary to pursue reasonable lines
15 of inquiry in respect of a defence case that somebody
16 had raised?

17 **A.** The inquiry concerned the non-crediting and
18 everything -- every line of inquiry was done regarding
19 somebody not being credited with the cash that should
20 have been deposited some weeks or months earlier. So --

21 **Q.** So no lines of inquiry went to the reliability of the
22 Horizon system?

23 **A.** The Horizon system is another issue.

24 **Q.** But it's the central issue in their defence statement,
25 that's why I'm asking.

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1 defence in that case?

2 **A.** As I said, that's mitigation. They've said they've
3 committed that offence because they were having losses
4 but they never said, "I had a loss of this day", because
5 they're making the paperwork correct.

6 **Q.** If they were making the paperwork correct because
7 a significant discrepancy had been caused by the Horizon
8 system that the Post Office had put into their offices,
9 would you still have pursued a criminal prosecution?

10 **A.** That's on the advice of Cartwright King. The inquiry
11 was done based on giro deposits from people, members of
12 the public, donating to a charity not being credited to
13 that charity. That's the line Cartwright King had
14 taken.

15 **Q.** You were the Investigator in the case. You must have
16 had a view. Did you have a view if, for example, it
17 could be shown that there was a significant discrepancy
18 in that branch caused by the Horizon system, would you
19 not have offered a view as to whether it's in the public
20 interest to prosecute that case?

21 **A.** I've explained, in this case the public interest is the
22 people not getting the -- their funds what they've given
23 to the charity, credited to the charity. I can't say
24 anything further. That's another -- that's their
25 mitigation, as I keep using, that they were having

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1 losses, but I'm unable to try to find what the losses
2 were. They couldn't tell us they had a loss on this
3 day, that day.

4 **Q.** So the cause of a discrepancy would not feature in the
5 assessment as to the public interest in prosecuting
6 a case?

7 **A.** As previously explained to you, everything has to be
8 taken into context.

9 **Q.** Can we look at page 8 of this document that we're
10 currently on, please. It's a letter from Cartwright
11 King to Ms Nield's solicitors. If we scroll down,
12 please:

13 "Disclosure of Prosecution Material under Section 7
14 Criminal Procedure and Investigations Act.

15 "I have considered your defence statement dated
16 9 August 2012. Under section 7 I am required to
17 disclose to you any prosecution material which has not
18 previously been disclosed and which might reasonably be
19 expected to assist your defence as described in your
20 statement.

21 "On the basis of the defence statement you have
22 provided, I have not identified any further prosecution
23 material which is disclosable to you in accordance with
24 the CPIA."

25 Over the page, it says as follows:

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1 "Access to the system used by the defendant ..."

2 If we scroll over the page again, on to page 3,
3 please, there are submissions within this application.
4 Paragraph 15, 16 and 17:

5 "It is submitted that material which suggests that
6 the Horizon system has accounting faults is therefore
7 relevant to, and of potential assistance to, the defence
8 for the reasons outlined at paragraphs 12-14 above.

9 "It is submitted that access to the Horizon system
10 by a defence forensic accountant is necessary ...

11 "Furthermore, if a forensic examination of the
12 Horizon system used by this defendant reveals that the
13 losses were incurred as a result of computer error it
14 may be that the prosecution review the decision that
15 pursuance of this case is in the public interest."

16 That's the point that I was making before: that
17 might it not be relevant to the public interest as to
18 whether there was a problem with the Horizon system?

19 **A.** I fully accept what you say but also the public interest
20 is you have a charity where donations have been given
21 and they have not received them over a period of weeks
22 or months, which caused cash flow problems for that
23 charity. The charity made the complaint and that's why
24 it was -- an inquiry was raised.

25 **Q.** Might there be number of different public interests to

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1 "Your client is charged with false accounting by
2 failing to make entries onto the Horizon system
3 regarding the deposit slips found and thus the offence
4 has occurred outside of the system. Material relating
5 to the Horizon system is therefore not deemed
6 disclosable at this time."

7 Was that something that you therefore agreed with?

8 **A.** That's -- as I said, the lawyers are the ones that do
9 all disclosure. Whether I agree or disagree with it,
10 that's the lawyers doing sort of that. My understanding
11 and my way would be that whatever you have, you
12 disclose. That's up to the lawyers.

13 **Q.** Did you, as at the date of this letter, pass on to the
14 lawyers any concerns that you had about the reliability
15 of the Horizon system?

16 **A.** I would say no because the lawyers would know of any
17 concerns that are involved in the Horizon system.

18 **Q.** We'll see that in Ms Nield's case the solicitors pushed
19 further and made an application for disclosure. Can we
20 please see POL00044041, please. If we could scroll
21 down, it sets out the application. It says:

22 "The defendant has sought, and been refused
23 disclosure of the following:

24 "Details of complaints and investigations into the
25 Horizon computer system;

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1 take into account?

2 **A.** No doubtedly there would be, depending which person of
3 the public is looking at it. People who give readily to
4 charities, or whatever, would probably find it -- that
5 maybe they should be prosecuted because there are then
6 monies going over and not being credited to the charity.
7 Other people may take your view.

8 **Q.** You're the Prosecution Authority in this particular
9 case. Did you not think it worthwhile thinking, casting
10 your mind to that particular public interest?

11 **A.** I am not the Prosecution Authority. I gathered all the
12 information and passed it to the lawyers. They decide
13 whether a prosecution ensues, not me.

14 **Q.** Can we please bring up on to screen your witness
15 statement again, WITN04450100. It's page 12, paragraphs
16 42 to 44. This is what you've said in relation to this
17 case:

18 "I have been asked to set out my recollections of
19 these proceedings and been referred to a number of
20 documents. This enquiry concerning suppression of
21 deposit dockets was assigned to me. On the date of the
22 audit the letter was handed over which had been jointly
23 prepared by Ms Sefton and Ms Nield stating they had been
24 withholding customer deposit slips. Slips had been kept
25 in a cupboard behind the counter.

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1 "There were no concerns, the investigation was
2 conducted in a professional manner at all times.

3 "I have no other reflections about this matter."

4 In light of our discussion just now, do you have
5 anything that you would like to reflect on in this
6 particular case?

7 **A.** Concerning that inquiry, I have explained, it sets
8 about, as it says in there, the suppression of cash
9 deposit slips. I can't say no further than that.
10 That's what the inquiry was about.

11 **Q.** So are we to take it that you have no further
12 reflections about this matter?

13 **A.** If you wish to take it that way, yes.

14 **Q.** I'm going to move on to the case of Grant Allen. Can we
15 please look at RLIT000039, please. Thank you, back to
16 the Court of Appeal. This another appeal. We've got
17 Grant Allen named on the front of this, if we scroll
18 down. Can we please turn to page 4 and I will briefly
19 read from the judgment in his case. I think you were
20 the Lead Investigator in Grant Allen's case; is that
21 right?

22 **A.** Correct.

23 **Q.** Paragraph 16, please. We have there:

24 "Mr Allen pleaded guilty to a single count of fraud.
25 The particulars of the count were that he had falsely
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1 still pending. Cartwright King stated that, on receipt
2 of the report, the Post Office would consider their
3 continuing duty of disclosure and provide a copy if
4 appropriate."

5 Paragraph 21 says:

6 "The Post Office served a witness statement from
7 Gareth Jenkins. Mr Jenkins stated that he had been
8 shown extracts from Horizon reports from which he had
9 concluded that there were communication difficulties
10 with Horizon. He stated that provided all operational
11 processes were properly followed no data should be lost.
12 Mr Jenkins made clear that he had not seen detailed logs
13 to see whether Horizon could be responsible for the
14 losses at Mr Allen's branch. He concluded that Horizon
15 'will accurately record all data that is submitted to it
16 and correctly account for it'. Correspondence between
17 Cartwright King and Mr Jenkins indicates that Cartwright
18 King instructed Mr Jenkins not to analyse the detailed
19 logs, in order to avoid incurring additional costs."

20 At paragraph 23, it says:

21 "None of the evidence that is now available suggests
22 that the Post Office made any disclosure relating to
23 Horizon reliability or that it provided Mr Allen with
24 branch data. The evidence to prove the existence of
25 a shortfall was wholly dependent on Horizon
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1 represented that his branch had more cash on the
2 premises than was actually the case resulting in
3 a shortfall of £11,000. He pleaded guilty on the basis
4 accepted by the Post Office that he could not account
5 for the loss but admitted covering it up."

6 If we go over the page, please, to paragraph 18 it
7 describes his account. It says:

8 "He gave a detailed description of his financial
9 difficulties which had been caused in the main by the
10 relocation and refitting of his branch. He described
11 inexplicable small losses as well as some large losses
12 which had been attributed to one member of staff. He
13 denied that he had stolen any money. He expressed
14 a willingness to repay the loss but disputed that the
15 sums represented actual loss to the Post Office and
16 maintained that they had been caused by issues with the
17 system.

18 "A number of logs retained by the Post Office
19 demonstrate that he reported the relocation problems and
20 his concerns about faults with Horizon.

21 "During the course of criminal proceedings on
22 2 November 2012, his solicitors requested disclosure of
23 an independent review of the Horizon system, believed to
24 be the Second Sight report. The Post Office's agents,
25 Cartwright King, responded by indicating the view was
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1 reliability."

2 Over the page:

3 "In these circumstances, the Post Office accepts
4 that the prosecution was both unfair and an affront to
5 justice."

6 Can we now look at the offender report. It's
7 POL00089464, please. Am I right to say that this report
8 was written by yourself?

9 **A.** Yes.

10 **Q.** Yes. Looking at the final page, it's dated 1 May 2012.
11 Can we please go to page 2. It says there:

12 "An audit was undertaken at the branch on Thursday,
13 2 February 2012 and conducted by Richard Cross, Field
14 Support Advisor of the Network Support Field Team.
15 Mr Cross was accompanied by his colleagues Rob Lyon,
16 Jane Timms, Paul Hayhurst and Tim Gordon-Pounder. The
17 purpose of the audit was to verify assets due to the
18 Post Office and confirm compliance", et cetera.

19 We have there five named individuals. Again, is it
20 your evidence that it was not unusual for a large number
21 of people from the Post Office to attend individual post
22 offices?

23 **A.** For an audit, it depended on the size of the branch.
24 There's some branches that may only have one, some
25 three.
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1 Q. Did it strike you as unusual to have five people
2 attending?

3 A. As I say, it's about the size of the branch and that
4 will be done by the Audit Team. They will take into
5 account the amount of stock, cash and stock that's in
6 the branch, and they will put the number of people
7 accordingly to get it done as quickly as possible.

8 Q. Could we please turn to page 4. It sets out there
9 a summary of the account in interview. I'm going to
10 briefly read from that. It says:

11 "Mr Allen said that they relocated in March 2010 and
12 the cost of the refurbishment and other costs amounted
13 to £100,000. He further said that during the first four
14 weeks after the move the branch was not 'running at full
15 capacity' as the works carried out by Romec were not up
16 to standard and a number of terminals had been wired
17 incorrectly.

18 "Mr Allen said that between the period of November
19 2009 and March 2010 he had to make good losses in the
20 region of £1,400 and this amount can be seen in his
21 business accounts.

22 "Mr Allen explained that during the period of March
23 2010 and April 2010 there was a discrepancy in the
24 accounts of £3,000, he said that he had checked all the
25 paperwork but could find no explanation for this

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1 in this case, a polling issue, so possibly
2 a connectivity issue, we have heard evidence that it is
3 the Horizon Helpdesk you should be calling, not the
4 NBSC.

5 A. My understanding at this time, when Mr Allen relocated,
6 there was issues with building the base unit and whether
7 it had something to do, I think it's something like,
8 I don't know the wires that use DSL, what you'd link --
9 like your telephone wires, but there is a Property
10 Project Manager who would oversee all that. By the time
11 it was done and he was up and running and working, my
12 understanding is that everything was working correctly.

13 Q. That was your understanding?

14 A. That's my understanding.

15 Q. Now you're carrying out an investigation into a very
16 serious matter and you have requested from the NBSC
17 certain call logs. Did you think about requesting call
18 logs from Fujitsu?

19 A. As I said earlier, at that time, that's when my
20 understanding was that you'd request the call logs and
21 get them all. But, again, in there there's been no
22 calls to report any discrepancies on Mr Allen's own
23 admissions.

24 Q. In terms of software problems or hardware problems, the
25 NBSC wasn't the correct hotline to call. Are you saying

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1 discrepancy. He then made admissions that this £3,000
2 was never made good and had been rolled over from each
3 branch trading period to the next until the audit took
4 place in February 2012.

5 "Mr Allen's explanation for this discrepancy was
6 that due to the relocation of the branch, the Horizon
7 system was not communicating (ie polling) and the data
8 on the Horizon system was not being sent."

9 Can we turn to page 8, please. We then have your
10 analysis. It says:

11 "Post-interview, the non-pollled report for the
12 Horizon system was requested after the branch relocated.
13 The report shows that an engineer attended. The
14 engineer completed a base unit build and BT fixed
15 a fault."

16 It has a copy:

17 "A telephone call was also made to the branch
18 confirmation team and they report that they had not been
19 contacted in relation to any £3,000 discrepancy.

20 "The call logs were also requested from the National
21 Business Support Centre for the period. No calls are
22 listed in connection with any discrepancies at the
23 branch."

24 Now, there's no reference there to the Horizon
25 System Helpdesk. If somebody had a software issue or,

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1 that you weren't aware of the difference between the two
2 at that time?

3 A. At that time, I don't think I was. Between the call
4 logs, one or the other. Eventually you, as discussed
5 previously, you knew that Horizon call logs come from
6 Fujitsu, and call another way.

7 Q. Thank you. Can we please look at POL00089380. This is
8 an email from yourself to Andrew Bolc, dated 12 December
9 2012. If we could actually start on page 3. Bottom of
10 page 2 onto page 3. It's an email from Andrew Bolc to
11 you. If we could scroll down a little bit more. Thank
12 you. This is to Gareth Jenkins, and he says:

13 "Dear Gareth,
14 "I've just spoken to the solicitor for Grant Allen."
15 It's about a re-listing. He says:
16 "I attach an extract from Mr Allen's interview. As
17 in the case summary I sent you he is trying to suggest
18 that an initial loss of £3,000 is attributable to lost
19 data which had not reached Head Office because of
20 installation problems. Are you able to comment on this
21 scenario at all? Ultimately, we would need to discredit
22 this as an explanation that holds any water. He denies
23 stealing the subsequent losses and therefore any
24 implication may be seeking to blame the system for those
25 losses as well."

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1 Do you think that it was appropriate for Mr Bolc to
 2 email Mr Jenkins to say that, ultimately, we would need
 3 to discredit the defendant's allegation?
 4 **A.** Again, you know, whether my opinion says right or wrong,
 5 in this way, that's Mr Bolc's way of speaking to
 6 Mr Jenkins. At that time I have -- you know, I only got
 7 sight of all this when it's finally come to me at the
 8 top end of the email.
 9 **Q.** Yes, so it's an email chain that you received the entire
 10 chain?
 11 **A.** Yeah, and I'm right at the end of email chain.
 12 **Q.** Let's look one email above that, to begin with,
 13 a response from Gareth Jenkins to Mr Bolc. He says as
 14 follows:
 15 "I think I understand what he is claiming. However,
 16 where there are comms problems, it's normal to recovery
 17 any missing data once the comms are sorted out so this
 18 shouldn't be a reason for a loss. Also, there are
 19 processes in place to retrieved outstanding data where
 20 there are extended comms issues lasting more than seven
 21 days."
 22 He says:
 23 "I could just make a general statement relating to
 24 that or, if we retrieve data from the time, I could
 25 check out exactly what happened in this case."

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1 Limited but any time I spend examining the data (say
 2 a couple of days) would be chargeable to Post Office
 3 Limited and so there are commercial considerations for
 4 you or Post Office Limited to consider. As we are
 5 nearing the Christmas break, I cannot commit to doing
 6 any such analysis before the New Year."
 7 Were you aware of commercial considerations and
 8 concerns about having to spend money on Fujitsu's
 9 assistance?
 10 **A.** There's always been commercial concerns because I think
 11 part of the contract was you got so many -- when you
 12 requesting -- sorry, requesting the ARQ data, there was
 13 so many sort of like free ones any more, so you would
 14 look at what data is required because, sometimes, you
 15 meet get a blanket "I want five years' worth" and you
 16 have to look at the consideration of that.
 17 However, if it's required for the case, the cost
 18 does not come into it. If it's needed, it should be
 19 applied for.
 20 **Q.** If we scroll up, we then see a response. Mr Bolc says
 21 as follows, he says:
 22 "Thank you for considering the position so promptly.
 23 I can now confirm that the case has been put back.
 24 I would appreciate if you could add your general
 25 comments at this stage regarding the safeguards in place

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1 He continues:
 2 "I've checked with Penny ..."
 3 I think Penny Thomas.
 4 **A.** Penny Thomas, I think so, yes.
 5 **Q.** "... in our prosecution support team and Post Office
 6 Limited have not credited any audit data relating to
 7 this case. She has checked back as far as April 2010,
 8 nor have we been asked about Helpdesk calls which would
 9 probably have occurred if there were comms issues.
 10 "Is it worth asking Post Office Limited to request
 11 such data for me to examine before putting together
 12 a specific statement for this or is a simple generic one
 13 sufficient?"
 14 Just pausing there, is this the email that caused
 15 you to think about the differences between the NBSC?
 16 **A.** I can't say for certain, whether it's just been
 17 a conversation with other members of the team, you
 18 suddenly find when you were asking for call logs, and,
 19 you know, "Where's me Horizon logs? What's this?" and
 20 then you find you have to go a different way, and when
 21 we requested Horizon call logs, it always went via the
 22 Casework Team or the Security Team.
 23 **Q.** It continues:
 24 "Note that the data retrieval is part of the
 25 standard service that Fujitsu provides to Post Office

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1 for comms problems to your statement and send this to me
 2 as before and will refer back to the Post Office to
 3 consider whether we go on to request the retrieval of
 4 data for your further analysis. I say so on the
 5 assumption that the data is available for 7 years. An
 6 idea of what two days analysis would cost would assist
 7 in that decision."
 8 Just pausing there, why would the cost assist in the
 9 decision as to whether to seek the data or not?
 10 **A.** I can't say for that, that's between -- I'm not subject
 11 to -- party to all this about costs backwards and
 12 forwards. That would be solely between them.
 13 **Q.** I mean, Mr Bolc would, of course, have had to have taken
 14 instructions from the Post Office?
 15 **A.** From the Post Office itself, not from me.
 16 **Q.** Who would provide him with instructions on costs?
 17 **A.** Probably -- whether it would be the Casework Team or
 18 something, it wouldn't be taken from me.
 19 **Q.** He then says:
 20 "With regard to Helpdesk calls, I also assume that
 21 this information available freely to the Post Office,
 22 and therefore would request that enquiry is carry out.
 23 I attach the Horizon non-polling report obtained by the
 24 Investigator in this case previously."
 25 Could we scroll up to the very top of this chain,

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1 please. Mr Bolc emails you and says:
 2 "Please see the attached report from Gareth
 3 regarding this case, which I propose to serve on the
 4 defence. I had asked him to look at the non-polling
 5 issue raised in Mr Allen's interview and I believe that
 6 he has dealt with it adequately for our purposes.
 7 Gareth tells me that it is in fact possible for him to
 8 retrieve the actual data from this time to see what
 9 actually occurred at this branch and that the retrieval
 10 of the data is free to the Post Office. However, he
 11 estimates that it will take approximately two and a half
 12 days for him to look at it and analyse what it means and
 13 this will be chargeable to the Post Office at £2,500
 14 approximately. I have told him that at present we do
 15 not wish to pursue this option unless it became
 16 unavoidable. Can you let me know your thoughts before
 17 I get him to sign it off."

18 Now, this is an email to you from Mr Bolc, just the
 19 two of you involved in this. Why, if you're not
 20 responsible for making decisions about the cost of
 21 retrieval, is he asking you whether to pursue that?
 22 **A.** I don't really know but, in the case for this email,
 23 I would -- it would either be replied to via an email
 24 back to him or a telephone call but, as I said, if it's
 25 required that the data is required, 2,500, by the sounds

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1 investigations, further data, was going to be obtained.
 2 It implies that you, the Investigator, was happy as it
 3 stands.

4 **A.** Can I explain how he said that? As I said, it indicates
 5 that I have spoken to him about it but, whatever the
 6 conversation is, I can't say at this time. It's whether
 7 it's, you know, whether it's me towards him or him
 8 towards me, so I think he's made the decision in the
 9 end. My stance would always be that, if it's required,
 10 irrespective of the cost.
 11 **Q.** Why isn't that reflected in this email?
 12 **A.** I can't speak for Mr Bolc. I don't know.
 13 **Q.** He said the Investigator is happy; you were the
 14 Investigator. It says the Investigator is happy with
 15 the report as it stands.
 16 **A.** That's probably be -- it could well be based on whatever
 17 he's explained to me.
 18 **Q.** Mr Bolc has given evidence to this Inquiry. His
 19 suggestion, in fact, was that the Investigator, the
 20 words "the Investigator" was, essentially, in speech
 21 marks because he didn't think you were much of
 22 an Investigator?
 23 **A.** Well, that's Mr Bolc's opinion.
 24 **Q.** What are your views on his opinion?
 25 **A.** I could say the same about Mr Bolc but I'm not going

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1 of that, in the greater scheme of things, isn't and, if
 2 it's required, they have to go ahead with it. It's
 3 almost as if --

4 **Q.** Was that your answer to Mr Bolc: that if it's required,
 5 it's required, and I don't care about the cost?
 6 **A.** Basically, that's my stance on it. It's as if he's
 7 trying to put it on me to sort of say "Oh it's too dear,
 8 don't bother with it". But my stance is, if it's
 9 required for any inquiry or prosecution, you have to get
 10 it.
 11 **Q.** It's your evidence that you clearly communicated that to
 12 Mr Bolc?
 13 **A.** Yeah, because have you ever been asked to do something?
 14 You know, I don't know how the communication has gone
 15 back whether it's been an email or a telephone call, but
 16 I would have answered him, and I do not let things just
 17 go off as if it's got to be buried away. I will have
 18 answered him.
 19 **Q.** Can we look at POL00089380, please. This is the
 20 response to this particular issue from Mr Bolc to
 21 Mr Jenkins -- sorry, it's FUJ00153884. He says:
 22 "Dear Gareth,
 23 "The Investigator is happy with the report as it
 24 stands. Please could you proceed as before."
 25 So absolutely no questioning there that further

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1 down that line. That is the thing. That's Mr Bolc. If
 2 he wants to say that, that's fine.

3 **Q.** You say you can say the same about Mr Bolc.
 4 **A.** Yeah.
 5 **Q.** What was your opinion of Mr Bolc and his abilities?
 6 **A.** Mr Bolc was a lawyer for Cartwright King, and that's --
 7 **Q.** What was your view --
 8 **A.** I'm not prepared to get into somebody's character.
 9 **Q.** Well, their abilities to carry out, for example,
 10 effective enquiries and effective prosecution is
 11 important in the context of this Inquiry, so we would be
 12 grateful for your views on Mr Bolc and his ability to
 13 carry out the job that he was tasked with?
 14 **A.** Okay, Mr Bolc works for Cartwright King. That's all I'm
 15 prepared to say on it.
 16 **Q.** That's not really an answer as to his abilities?
 17 **A.** As I say, there was no other issues with any other of
 18 the solicitors on my work, work effort, from any other
 19 solicitor within Cartwright King. So it can only be
 20 Mr Bolc's opinion.
 21 **Q.** Who was in charge of deciding whether to retrieve audit
 22 data?
 23 **A.** They would come as a request. Sometimes you may do it
 24 to identify something.
 25 **Q.** Who do you see as being ultimately responsible for

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1 requesting the underlying audit data in this case?

2 **A.** It depends on the Inquiry. When you are looking at the
3 inquiry of sort of the -- to try to establish something,
4 you may -- or the ARQ data via the Casework Team, or you
5 may be requested from the solicitors as the defence
6 required the ARQ data. It's a two-way street. It could
7 be either party.

8 **Q.** In this particular case, who do you see as having
9 responsibility for taking the decision as to whether the
10 data was requested or not?

11 **A.** Well, without the file, I can't say for certain whether
12 the data was ordered or not.

13 **Q.** Well, the email there is very clearly Mr Jenkins said
14 "I can carry out more of an investigation. The decision
15 has been taken not to carry out that further
16 investigation".

17 **A.** That's what the email implies but I will have discussed
18 that with Mr Bolc.

19 **Q.** Who is responsible for the ultimate decision?

20 **A.** Mr Bolc. He's the one putting the evidence together for
21 the defence, for answers for the defence.

22 **Q.** Can we, please, look at POL00089381, please. This is
23 the statement from Gareth Jenkins that was put forward
24 in that case. I'm going to read to you from the first
25 paragraph. It says:

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1 whether this occurred in this case or not). This
2 confirms the fact that there were indeed communications
3 issues between Horizon and the data centre at this time.
4 However, it should have had no impact on data recorded
5 locally within the branch provided all operational
6 processes were followed correctly. Also, once
7 communications were restored, all historical data should
8 have been sent from the branch back to the data centre
9 as normal. I have not had an opportunity to examine the
10 detailed logs from the period to see whether there were
11 any issues, and any justification in the claim that this
12 resulted in apparent system losses of £3,000 as
13 claimed."

14 Now, those final words in that final sentence,"
15 I have not had the opportunity to examine the detailed
16 logs", do you request that to be a fair and accurate
17 statement of the position that we've seen from those
18 emails?

19 **A.** It looks that way and that goes back by the previous
20 document you've shown, whatever -- whoever made the
21 decision has come through -- not to ask Mr Jenkins to
22 look at it. But my stance still stays the same: that if
23 money is required to sort something out, it's paid.

24 **Q.** Do you think it's important to have a fair and accurate
25 witness statement produced in criminal proceedings?

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1 "I am Gareth Idris Jenkins. I am employed by
2 Fujitsu Services Limited who have been contacted by Post
3 Office Limited to provide the Horizon systems operating
4 in Post Offices around the country. However,
5 I understand that my role is to assist the court rather
6 than to represent the views of my employers or Post
7 Office Limited."

8 If we go over the page, please, I'm going to read
9 some of that statement. He says:

10 "I have been asked to provide a statement in the
11 case of Grant Allen. I understand that the integrity of
12 the system has been questioned and this report provides
13 some general information regarding the integrity of
14 Horizon.

15 "I note that in the summary of facts, it is stated
16 that during the period of relocation in March 2010, that
17 Mr Allen believed that a £3,000 discrepancy was due to
18 Horizon not sending out data (non-polling). I have been
19 shown extract from the Horizon non-pollled reports for
20 the period 8 to 17 March, which shows that the Winsford
21 Branch was included in the report for 12 days up to and
22 including 17 March. This in itself is unusual as if
23 a branch appears on the non-pollled report for more than
24 a few days, an attempt is made to retrieve the data by
25 other means before Day 10 (I have no knowledge as to

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1 **A.** Of course it is.

2 **Q.** Is your view that Mr Jenkins didn't have the opportunity
3 to examine the detailed logs, do you think that's a fair
4 and accurate --

5 **A.** Based on the first -- the email from Mr Bolc, yes.

6 **Q.** It is a fair description?

7 **A.** Sorry, no, based on the first email, Mr Jenkins should
8 have been given the opportunity, if it was required, to
9 examine further data.

10 **Q.** Because there was the opportunity present, it just
11 wasn't taken up?

12 **A.** Based on the email, yes, you're correct.

13 **Q.** Can we please look at the very final page of this
14 witness statement. He ends the statement by saying:

15 "I have been involved personally in a number of
16 challenges to the integrity of the original Horizon
17 system and produce Witness Statements for a number of
18 cases where the integrity has been challenged. I am not
19 aware of any cases where the integrity of Horizon Online
20 has yet been successfully challenged in court."

21 Just pausing there, that's very similar to the
22 wording of your statement that we looked at, at the very
23 beginning of today, in terms of not being aware of any
24 successful challenges in court. Were you or anybody in
25 your team involved in the drafting of this witness

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1 statement.

2 **A.** No, not at all.

3 **Q.** "The main challenges in the cases where I have been
4 involved were presented as 'hypothetical issues' and my
5 previous witness statements went through each of these
6 hypotheses and showed that there is no specific evidence
7 for any of them in the data presented. In summary,
8 I would conclude by saying that I fully believe that
9 Horizon will accurately record all data that is
10 submitted to it, and correctly account for it. However,
11 I cannot compensate for any data that is incorrectly
12 input into it as a result of human error, lack of
13 training or fraud (and nor can any other system)."

14 Can we please turn to POL00089065, please. This is
15 your post-conviction report. I think you drafted this
16 report.

17 **A.** It's what is known as a -- the final report. It's
18 trying to summarise fully what had happened in the
19 court.

20 **Q.** Thank you. If we scroll down, it explains that Mr Allen
21 had previously indicated that he would be willing to
22 plead guilty on the basis that he cannot account for the
23 loss but admits covering it up."

24 It says that Jarnail Singh considered that to be
25 an acceptable plea. We then scroll to the bottom, and

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1 **A.** At the time, we were told, as you've said on numerous
2 occasions, while he was -- for the Horizon, where we're
3 told, as Mr Jenkins said in his statement, you know,
4 that -- the system was okay. 100 per cent you couldn't,
5 based on certainly what's known now, and sort of thing,
6 that it's a paper loss. But also, whatever cash is in
7 the Post Office would still always be there.

8 **Q.** I'm going to move on to the case of Noel Thomas, please,
9 and that can be found at POL00113278. We're looking at
10 paragraphs 149 to 155. I'm afraid I don't have the
11 page number. I think in Mr Thomas' case, I think, you
12 assisted Diane Matthews in that investigation?

13 **A.** Correct.

14 **Q.** I'll read briefly from the Court of Appeal's judgment.
15 They say:

16 "Hughie Thomas worked as a postman between 1965 and
17 1992. He became a subpostmaster in 1994. On
18 29 September 2006 he pleaded guilty to one count of
19 false accounting. Mr Thomas' written basis of plea
20 stated that no blame was attached to Horizon and that he
21 accepted there was a shortage which he was contractually
22 obliged to make good, but he did not know how it had
23 come about.

24 "The Post Office accepts that this was
25 an unexplained shortfall case and that evidence from

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1 it says:

2 "No costs or compensation was ordered as the
3 defendant was due to declare himself bankrupt. There is
4 a loss of £11,705 to Post Office Limited and the civil
5 route should be considered to recover the outstanding
6 amount."

7 Having not considered the underlying data in this
8 particular case, how could you be satisfied that there
9 was an actual loss of £11,705?

10 **A.** Again, without going through all that data, at the time,
11 that's what it showed and that last sort of paragraph,
12 normally the judge, when summing up, would sort of --
13 when you're asked for costs, would normally say "Any
14 outstanding things to be done by the civil route?"

15 So Mr Allen admitted there was a shortfall, you
16 know, the part in question is where the loss comes from.
17 But he admit it because he told the auditors right at
18 the beginning it's going to be £10,000 out, and that's
19 where that's come from.

20 **Q.** The basis for his plea, as we've just seen, is that he
21 couldn't account for the loss but he admits covering it
22 up. So his admission was "I covered it up, I don't know
23 how it happened". How could you be satisfied that in
24 fact that money had been lost and it wasn't just simply
25 a paper loss?

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1 Horizon was essential to Mr Thomas' case. Mr Thomas had
2 stated that he was having problems with Horizon. In
3 particular, his online banking reports showed several
4 transactions with a nil amount. These were occasions
5 when he paid money to a customer but the system did not
6 record the value of that transaction. This led to
7 losses so he altered the cash-on-hand figures in order
8 to balance the accounts. In his interview under
9 caution, Mr Thomas said that the alleged loss was due to
10 mistakes on Horizon and that he did not understand the
11 system. He had made 13 calls to the Horizon Helpdesk.

12 It says:

13 "Although some ARQ [that's Fujitsu audit data] was
14 obtained, it was a dip sample and it was only checked
15 for evidence of zero transactions. The data was not
16 checked for bugs, errors or defects or for evidence of
17 theft. The prosecution produced a witness statement
18 from Mr Jenkins explaining the Horizon system and
19 producing some ARQ data. Mr Jenkins produced three
20 schedules from that data to explain the zero
21 transactions were normal occurrences."

22 At the next paragraph, paragraph 152, they say:

23 "These factors are sufficient for the court to quash
24 Mr Thomas' conviction on both Grounds 1 and 2. We were,
25 however, present with further information which bolsters

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1 our conclusion that Mr Thomas' prosecution should not
2 have been brought and which forms the basis of the Post
3 Office's concession under Ground 2. An attendance note,
4 written by a Post Office prosecution lawyer on the case,
5 recorded a conversation with an external solicitor. The
6 note is dated 25 September 2006, four days before
7 Mr Thomas entered his plea at the Crown Court on the
8 basis that Horizon was not to blame for the shortage.
9 It records:

10 "We discussed whether he should plead guilty to
11 false accounting. I mentioned instructions that we
12 would proceed with false accounting provided the
13 defendant accepts that the Horizon system was working
14 perfectly ... Further instructions are that the money
15 should be repaid. Ann could inform Jack that some
16 agreement should be reached taking into account the
17 above instructions.'

18 "As POL accepts, there was no justification for
19 imposing such a condition before accepting Mr Thomas's
20 plea."

21 Then it continues in paragraph 155:

22 "In our judgment, these additional factors are in
23 themselves bound to bring the justice system into
24 disrepute, providing further strong reasons to allow the
25 appeal under Ground 2."

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1 could be a reason why they may have gone down that line.

2 **Q.** Can we, please, look at POL00017903. This is
3 a different case, case of Katherine Jane McQue. Were
4 you the officer in that case?

5 **A.** Correct.

6 **Q.** You're named, I think, as Disclosure Officer on the
7 schedule. I think you were the interviewing officer, as
8 well, in that particular case?

9 **A.** Yes.

10 **Q.** I'm going to read from this memo. The memo has your
11 name at the top, sent to you by the principal lawyer.
12 It says:

13 "The above case was heard in Carlisle Crown Court
14 when the matter was listed for trial.

15 "Prior to the case being called on there was some
16 discussions between all parties with a view to
17 establishing whether or not the pleas offered by the
18 defence would be acceptable.

19 "An indication was given that a plea to Count 2
20 fraud might be acceptable so long as the Defendant
21 stipulated in her Basis of Plea that there was nothing
22 wrong with Horizon and that she was responsible for the
23 loss and recognised the confiscation would be sought
24 should the loss not be repaid.

25 "In the afternoon the matter was called on and the

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1 Was it, in your experience, unusual for the Post
2 Office to offer a plea on the basis that the defendant
3 had to accept that the Horizon system was working
4 perfectly?

5 **A.** Well, either has happened, that's -- this case as well,
6 but normally the prosecution and defence barristers
7 normally speak to one another. Normally when you might
8 have the two charges, basically always theft or false
9 accounting, and you may get the answer, they're willing
10 to plead to false accounting or to theft, and
11 instructions will be taken from the Post Office
12 solicitors and it's accepted. But I think that's the
13 angle. They went down round about that time with the
14 issues regarding Horizon.

15 **Q.** In your experience, were there circumstances where the
16 Post Office, in order to accept a plea, said that the
17 defendant had to accept that the Horizon system was
18 working --

19 **A.** As I said, I believe it has happened.

20 **Q.** Has it happened in a case that you were involved in?

21 **A.** I can't say for definite that it has, sort of thing, but
22 on Mr Thomas' -- during his interview, he did say he
23 didn't like the Horizon system because he kept getting
24 error notices, which indicated he was actually making
25 the error, rather than it being the system, and that

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1 indictment was put again to the defendant. She pleaded
2 guilty to the charge of fraud accepting that there was
3 nothing wrong with Horizon and that she was responsible
4 for the loss."

5 Just pausing there, there's nothing there suggesting
6 that this came from the defence. This is, it seems
7 clear, doesn't it, from this memo, that it was --

8 **A.** It looks that way but again, at the time, the defence
9 and the prosecution would be talking. It's one part
10 of -- it's not the full story, so to say, of what's
11 happening on the day in court.

12 **Q.** Do you think it's appropriate for the Post Office to say
13 to a defendant that "We might accept the second count on
14 the indictment as long as the defendant, in their basis
15 of plea, recognises that there's nothing wrong with
16 Horizon"?

17 **A.** It may well be taken because of whatever was said during
18 the interview and I believe --

19 **SIR WYN WILLIAMS:** Just answer Mr Blake's question.

20 **A.** I'm trying to, Mr Williams.

21 **SIR WYN WILLIAMS:** But it's a simple question: is it
22 appropriate for someone representing the Post Office to
23 say, "We will accept your plea but only if you don't
24 blame Horizon"?

25 **A.** Probably not.

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1 **SIR WYN WILLIAMS:** Thank you.
 2 **MR BLAKE:** This was a case where you were the Investigator
 3 and the Officer in the Case.
 4 **A.** As I was trying to explain, there was also a defence
 5 expert that they put in, and that will have been part of
 6 the discussion within the court as well, whatever the
 7 defence expert case has said.
 8 **Q.** It may have been something that was accepted but I think
 9 your evidence is you accept that it would not be
 10 appropriate for the Post Office to make that condition
 11 in the first place?
 12 **A.** Certainly with today's knowledge, no.
 13 **Q.** Well, what about the knowledge you had then: 2011?
 14 **A.** Well, as I said earlier, that's the way some of the
 15 cases were going, that -- because of -- whether the
 16 instructions come from the solicitors, and that's
 17 where -- because that's true.
 18 **Q.** Whose idea was it? We've seen it now in two cases --
 19 **A.** It wasn't mine.
 20 **Q.** -- in Noel Thomas' case we have it; we have it in
 21 Ms McQue's case?
 22 **A.** Noel Thomas, I was the second officer, so I had very
 23 little before and afterwards dealing with Mr Thomas so
 24 that's done by the other officer and this is what's
 25 coming out from our solicitors.

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1 causing the losses."
 2 It says:
 3 "I haven't taken it as far as I'm concerned I don't
 4 think the staff have.
 5 "Mrs McQue had kept the losses to herself and not
 6 informed staff, she thought they were errors and would
 7 come back."
 8 If we scroll down, it says:
 9 "Mrs McQue said she had not felt 100% with the
 10 Horizon system."
 11 You were aware at the time that central to her
 12 defence was issues with the Horizon system?
 13 **A.** Yes.
 14 **Q.** Yes, and does that -- did that impact in any way on your
 15 thinking about whether it was appropriate or not to
 16 ensure that any plea was on a basis that the Horizon
 17 system was working perfectly?
 18 **A.** Of course it does, and as I say, I reported the facts of
 19 the interview and any enquiries made to the Criminal Law
 20 Team.
 21 **Q.** Could we look at POL00141225, please. Could we scroll
 22 down to page 5, please. If we could scroll down to the
 23 bottom email we have an email from Andrew Daley to
 24 a number of people, including yourself, and if we keep
 25 on scrolling down it relates to duplication of

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1 **Q.** Lawyers obtain instructions from their client on the
 2 whole. Was the Post Office providing instructions to
 3 the lawyers in this respect? Where was this coming
 4 from?
 5 **A.** The -- I've explained the Investigator will put all the
 6 papers together and send it sort of off to the lawyers.
 7 The lawyers made the bulk of every decision. That would
 8 sort of come back to us. We wouldn't say, "Oh yeah,
 9 we'll have the plea as long as they say this or say
 10 that". That would have been decided on higher level
 11 than me and that's where it comes from, whether it's
 12 Mr Singh in charge or any of the other lawyers.
 13 **Q.** Can we look at POL00013661, please. This Ms McQue's
 14 interview. You were, in fact, the interviewing officer
 15 so, at that stage, you were the main officer; is that
 16 right?
 17 **A.** The inquiry was assigned to me, yes.
 18 **Q.** Yes. If we scroll down, she didn't have a lawyer
 19 present but she had, I think, a friend from the National
 20 Federation of SubPostmasters. Could we go over the
 21 page, please. It says:
 22 "Mrs McQue was asked to explain further the losses
 23 at the branch as she had only been inflating the cash to
 24 cover the losses since August 2008. Ms McQue said that
 25 she had losses all the time she did not know what was

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1 transaction records in the Fujitsu audit ARQ returns.
 2 Can you see there that there is an email about
 3 concerns that there may be duplication of transaction
 4 records in certain ARQ returns and, if we scroll down
 5 over the page, we have the Rinkfield post office, which
 6 is Ms McQue's Post Office.
 7 This was the year before the plea was accepted, on
 8 the basis that there was nothing wrong with Horizon. Do
 9 you recall being informed that there might be issues
 10 with the duplication of transactions?
 11 **A.** If it says so in there but I'm sure that the ARQ data
 12 was obtained for Rinkfield.
 13 **Q.** Yes, and the issue here is, where it is obtained, there
 14 may be a problem with the actual data itself?
 15 **A.** But you -- the data would have been looked at to see
 16 whether there's are duplicate data in there because
 17 they -- the transaction would show the same. You would
 18 have two perfectly sort of -- say, a cash withdrawal
 19 with the same number and the same number at the same
 20 time.
 21 **Q.** This is 2010, so quite a bit of time before that plea
 22 was accepted. Knowing that these kinds of issues can
 23 arise, even with audit data, in her case and in Noel
 24 Thomas' case, do you think that it was appropriate for
 25 the Post Office to be insisting on conditional pleas on

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1 the basis that there was nothing wrong with the system?

2 **A.** Probably not no.

3 **MR BLAKE:** Sir, I have, I'd say, about 15 more minutes of
4 questions before we move on to questions from Core
5 Participants. We usually have an afternoon break at
6 around this time.

7 **SIR WYN WILLIAMS:** Can I get some idea of the participation
8 of the Core Participants, if I can put it in that way?

9 Mr Stein, are you going to ask some questions or
10 Mr Jacobs?

11 **MR JACOBS:** Sir, it will be me today, I think probably ten
12 minutes.

13 **SIR WYN WILLIAMS:** All right, that's fine. The pillar is
14 intervening.

15 **MR MOLONEY:** The same, sir.

16 **SIR WYN WILLIAMS:** Mr Henry or Ms Page?

17 **MR HENRY:** Fifteen minutes.

18 **SIR WYN WILLIAMS:** Right okay. Good, well anyone else,
19 I should say I've looked at the -- right, thank you.

20 So that's, on my calculation, 35 minutes?

21 **MR BLAKE:** Yes.

22 **SIR WYN WILLIAMS:** What's the time now?

23 **MR BLAKE:** It's now 3.20.

24 **SIR WYN WILLIAMS:** So we will have a 10-minute break, and
25 then I will hold each of you to your time estimates.

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1 conducted by the Investigators known as Mr Steve
2 Bradshaw ..."

3 He doesn't know the name of the person from Royal
4 Mail and over the page he says "Mrs Diane", presumably
5 that is Diane Matthews or is there another Diane who you
6 worked with?

7 **A.** Yeah, it's probably Diane Matthews.

8 **Q.** He says:

9 "This document is based on unpleasant experience,
10 inappropriate exercise, and improper code of practice,
11 unbearable attitude, harassment, and victimisation bully
12 faced by Mr Syed and the family during the unfair and
13 undue suspension and investigation process."

14 Can we turn over to page 57, which is where the
15 substance of the allegation is. It's the second half of
16 the page. He says:

17 "I entered into the house Mr Bradshaw with one of
18 his lady colleague called Diane was waiting for me,
19 Steve Bradshaw stood up shook the hands. Mr Bradshaw
20 showed me his identity, offer them to be seated. He
21 pulled out some forms from a file he had and asked me to
22 sign.

23 "The forms were not ordinary, they were legal forms
24 consent to search my house. Mr Bradshaw told me that
25 they came to search my house whether I stashed money,

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1 So you first, 15 minutes, Mr Blake; then Mr Jacobs
2 10; then 10 for you; and 15 for Mr Henry, and that will
3 be it.

4 **MR HENRY:** In fact it was agreed between the parties that
5 I would go first on this occasion.

6 **SIR WYN WILLIAMS:** Well, even more reason to hold you to 15
7 then. I'll see you in ten minutes.

8 (3.20 pm)

9 (A short break)

10 (3.31 pm)

11 **MR BLAKE:** Thank you. Mr Bradshaw, I'm going to move on
12 from the case studies and look at some contemporaneous
13 complaints that were made by some subpostmasters. Can
14 we please look at POL00108851, please.

15 It's page 52. This is a letter to yourself that was
16 ultimately exhibited in a County Court case of Azfar
17 Syed; do you recall?

18 **A.** I recall the name.

19 **Q.** If we could please look at page -- scroll down, so it's
20 for your attention, "Dear Mr Bradshaw", and Mr Syed has
21 produced what is called a Record of Investigation, and
22 if we scroll down, it's essentially a complaint from
23 him. If we scroll down further, we see he says:

24 "The document investigation is a document of history
25 of events and chain of activities carried out and

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1 Post Office paperwork or financial documents, I was
2 astonished and very unhappy and reluctant. Mr Bradshaw
3 threatened me if I do not consent, they will call the
4 police who will arrest, DNA, detained me and ruin my
5 house by digging and lifting floorboards.

6 "I was confused, lost and very disappointed, however
7 consent in the meantime Mr Bradshaw called his 3rd
8 colleague waiting outside in the car. I let them to
9 carried out the search, my house, my car was fully
10 searched. [I think that says 'In fact'] I assist and
11 the areas where even they didn't want to after 1 hour
12 and 15 minutes search nothing was found, some financial
13 details of my bank accounts were noted."

14 If we go over the page, please, towards the bottom
15 of the next page. He says:

16 "Because the discrepancy were not exist physically,
17 no cash was over or short so both were left unresolved
18 stare into local suspense I represent the training book
19 ..."

20 He says:

21 "Since then Chesterfield, helpline and trainer were
22 notified and involved to clear the discrepancy error and
23 the process was arrange by the training department",
24 etc.

25 Over the page, he says:

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1 "After a detailed dialogue and analysis some
2 documents prepared by Mr Steve [I think that's
3 a reference to yourself], the discrepancy was found
4 quite unrealistic, and absolutely unnatural ..."

5 He says:

6 "During the interview Mr Bradshaw stressed, shouted
7 and tried to put words into my mouth that I stole the
8 upon, that was very offensive, and unacceptable but
9 I replied and reject his attempt to make me say the
10 words no, never."

11 If you go to page 64, about halfway down the page of
12 64, he said:

13 "As I have already said repeatedly and reiterate
14 again and again from the day one of the problem raised
15 that the discrepancy shortage is a genuine paperwork
16 mistake, remittances, computer error or human error by
17 staff."

18 Moving on to another letter it's UKGI00014839. This
19 is a letter sent in 2009, from a Katie Noblet, I believe
20 she was the subpostmistress in Preston in Lancashire.
21 She says as follows, I'll just read half of this letter,
22 it says:

23 "I write to complain about the unprofessional
24 disgusting behaviour and actions of two of you
25 employees, these being Caroline Richards, a Business

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1 Steve didn't get what he wanted, Steve told Caroline to
2 close the post office, which is not his authority to do,
3 as I understand Steve and Caroline left the store."

4 Now, as I say, these aren't case studies, we haven't
5 looked into these cases at all or in any depth
6 whatsoever but can you assist us with why it is that
7 your name seems to crop up again and again?

8 **A.** I can understand, because they're not totally accurate.
9 Certainly Mr Syed, he would have been informed -- the
10 forms would have been explained to him over the phone
11 and we would have arranged to go and meet him. The
12 business at the time, I was supposed to ask people for
13 a voluntary search of their home address, and that's
14 what that was for, before any interview. It was always
15 a requirement of three people to do a search if possible
16 of that and that was due to an Investigator in the past
17 who was shot and killed while undertaking a search. So
18 where possible, there was always three people.

19 **Q.** Simply reflecting on the evidence that we've been
20 through today, from the interviews that we've looked at,
21 looking at these letters, do you think you might not
22 have been quite as professional as you think?

23 **A.** No, I don't think that at all. I will stand -- my
24 stance is they're taken out of context.

25 **Q.** I'm going to move on to a few miscellaneous topics, some

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1 Development Manager in Lancashire, and Steve Bradshaw
2 a Post Office Investigator.

3 "The Post Office I work for is under investigation
4 and I am now working all hours there. I received
5 a phone call from Steve Bradshaw asking me to make
6 a statement. He wanted my mobile phone number but
7 I don't use it for work. He asked me if I had any free
8 time, free during working hours, which I replied no, as
9 I'm working. I asked if giving the statement was
10 something I had to do. He said no, but it could get me
11 in the clear. He phoned again the same day wanting to
12 know if he could meet me to take a statement. I haven't
13 decided and wanted to seek legal advice, so I told him
14 I needed to think about it.

15 "The following day, Mr Bradshaw and Ms Richards came
16 to my place of work and asked if I wanted to make
17 a statement without introducing himself. I told them
18 I didn't know because I hadn't had a chance to seek
19 legal advice in under 24 hours when I work nine to five,
20 six days a week. I found Steve very confrontational.
21 I told Steve that I wouldn't make a statement without
22 legal representation and he told me that I wasn't
23 allowed one, which is a complete lie."

24 She says:

25 "After a very confrontational five minutes and after

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1 of which have been raised by Core Participants.

2 The first is contact with Gareth Jenkins. Can we
3 please look at FUJ00122938, please. It's page 7 of that
4 document. It's the bottom of page 7. We have an email
5 from yourself to Gareth Jenkins, and you say:

6 "Gareth

7 "Can you please see the attached report and our
8 Criminal Law Team ask that you consider the report and
9 let us have your initial views as to the contents of the
10 report and also your comments on the disclosure."

11 If we scroll up, we have his response. He says:

12 "I'm not aware of this case, but when I spoke to
13 Charles McLachlan (who is the 'Defence expert' for
14 a number of cases) last week he did mention that he was
15 now involved in a case in Cumbria, so perhaps this is
16 it."

17 We then have an email on the previous page, page 6,
18 from Penny Thomas. It seems to be a bit of a telling
19 off from Penny Thomas to you. If we scroll up, she says
20 as follows:

21 "Steve

22 "Your request to Gareth Jenkins and his response to
23 you have been copied to me.

24 "Please be aware that it is against process for
25 investigators to approach Fujitsu employees direct for

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1 assistance with litigation issues. Please direct all
 2 your requests via Jane Owen or her team at Salford."
 3 Can you assist us, first of all, in terms of Gareth
 4 Jenkins, I think you've said in your witness statement
 5 that you didn't really recall any --
 6 **A.** That's one of the -- that's one of the -- maybe once,
 7 twice, maximum. There is another email from Penny
 8 Thomas who explains why I contacted Gareth Jenkins
 9 direct, and that was on the -- at the request of the
 10 Criminal Law Team. Normally, everything would be done
 11 via Jane Owen and her team in Salford. This is
 12 an exception of why it's done and there is an email from
 13 Penny Thomas that explains that why I done it, and --
 14 **Q.** Yes, and that's higher up in this chain.
 15 **A.** Correct, yes.
 16 **Q.** Can you assist us, what was your knowledge of Penny
 17 Thomas's role?
 18 **A.** Penny Thomas is something to do with the prosecution
 19 part of Fujitsu. I only ever spoke to her a few times.
 20 **Q.** What did you understand the problem to be with
 21 Investigators contacting Mr Jenkins directly?
 22 **A.** I don't know what -- they put a process in that we were
 23 to go via the Casework Team for any -- they were the
 24 engagement -- the Casework Team had the engagement with
 25 Fujitsu; probably to stop every Investigator bombarding
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1 Mr Jenkins was considered by the business to be
 2 an expert witness and, as I say, all requests went via
 3 the Casework Team for anything from Fujitsu.
 4 **Q.** You said that "My understanding of an expert witness is
 5 a person who has greater knowledge" is that still --
 6 **A.** I would say that, yeah, somebody that had more knowledge
 7 of a particular field than somebody else would be
 8 considered an expert.
 9 **Q.** Mr Bradshaw, you're still employed by the Post Office in
 10 the Security Team. You have had a career had spans all
 11 of the issues that we have discussed, including the
 12 *Bates* litigation, including the *Hamilton* appeals. Do
 13 you think it's surprising that you don't have a greater
 14 understanding of the role of an expert in proceedings?
 15 **A.** As I say, Mr Jenkins -- as the business, the business
 16 had him down as Fujitsu's expert witness. My
 17 understanding, and I still stick by it, is a person who
 18 knows more in that particular field than the ordinary
 19 man.
 20 **Q.** But do you not think that, given everything that's
 21 happen at the Post Office, you perhaps should
 22 familiarise yourself a little bit better with what the
 23 role of an expert witness is?
 24 **A.** Maybe but, as I say, considering investigation-wise, we
 25 haven't done anything for 10 years I haven't. The last
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1 them with what's required.
 2 **Q.** Do you think that you had enough contact with Fujitsu?
 3 **A.** As I say, all contact with Fujitsu was always via the
 4 Casework Team. Anything that was required would go via
 5 the Casework Team.
 6 **Q.** Thank you. If we go, please, to FUJ00122939, please.
 7 We have there some comments that Mr Jenkins made, he
 8 says:
 9 "I've been asked to comment on the expert witness
 10 report produced by Charles McLachlan in the case of
 11 Katherine McQue associated with Rinkfield."
 12 Can we bring onto screen, please, your statement at
 13 page 5, paragraph 10 so your first statement. That's
 14 WITN04450100, it's page 5, paragraph 10. You say as
 15 follows, in relation to Gareth Jenkins, you say:
 16 "I did not know that Gareth Jenkins was considered
 17 to be an expert witness. My understanding of an expert
 18 witness is a person who has greater knowledge in their
 19 particular field than the ordinary person. I may have
 20 spoken with him when at the same court, but I do not
 21 recall having any discussions with him regarding his
 22 role."
 23 Had you received any training in relation to the
 24 role of an expert --
 25 **A.** I can't recall any training to expert witness. I think
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1 time I will have had any investigation through to
 2 prosecution is probably some time between January or
 3 July 2014.
 4 **Q.** Do you think it is unfortunate that, at that time, you
 5 were not aware of what the role involved?
 6 **A.** With hindsight yes, of course it is. You know, there's
 7 always a learning process.
 8 **Q.** Can we please look at POL00323641, please. This is
 9 an email from Andrew Bolc to yourself in relation to
 10 Chris Bramwell's case. If we could look at the final
 11 paragraph there, he says:
 12 "With regard to your statement which is in effect
 13 being treated as an expert report about the Horizon
 14 system, the judge has directed that you are to liaise
 15 with Mr Jenner, the author of the defence report, in the
 16 usual way between experts, to identify the issues of
 17 disagreement between you."
 18 So you had written a statement in this particular
 19 case that was in effect being treated as an expert's
 20 report; is that right?
 21 **A.** It depends which statement it is because I do recall
 22 seeing a statement when I said "I am not an expert", and
 23 I've clarified whatever the statement says. So whatever
 24 this statement is, I would need to see it first before
 25 sort of seeing it, or they've taken the statement when
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1 I explained what we explained earlier about, no, the
 2 workings, the actual hardcore machine, you know, the
 3 screen, et cetera, and what the -- if it's working
 4 correctly, what happens about transactions from start to
 5 finish.
 6 Now, if they've taken that as being an expert, I'm
 7 no expert. I have a working knowledge of Horizon but
 8 I'm certainly not an expert.
 9 **Q.** Do you think it is a little odd, perhaps, that you're
 10 being described as being treated as, in effect,
 11 an expert --
 12 **A.** It's --
 13 **Q.** -- and haven't had any kind of discussion with anybody
 14 as to the role of an expert?
 15 **A.** Completely and, as I said, in one of the statements
 16 where they've got me down as an expert, the beginning of
 17 the statement says, "I am not an expert".
 18 **Q.** In terms of your training more generally, can you assist
 19 us, did you have any qualifications whether it relates
 20 to giving expert evidence or if it relates to --
 21 **A.** Certainly not for giving expert evidence, no.
 22 **Q.** How about carrying out investigations?
 23 **A.** I've done the courses and I've done advanced
 24 interviewing courses both with the Met -- search courses
 25 with the Met -- Thames Valley Police, advanced
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1 through.
 2 **Q.** Thank you. I'm going to move on to --
 3 **SIR WYN WILLIAMS:** Well, Mr Blake, you've had a generous
 4 15 minutes and I think, to be fair to those that are
 5 following you, unless there's something critical, and
 6 I mean critical, I think we can hand over to the CPs
 7 now.
 8 **MR BLAKE:** Sir, I'm certainly happy, if there are any
 9 questions from Core Participants or should they have any
 10 questions that arise --
 11 **SIR WYN WILLIAMS:** Well, I'll be the arbiter now of what's
 12 critical or not and that includes you and them.
 13 So I say you stop and someone starts.
 14 Mr Henry.
 15 **Questioned by MR HENRY**
 16 **MR HENRY:** Thank you, sir.
 17 Mr Bradshaw, contrary to what you say, you and your
 18 department, the Security Department, were drenched in
 19 information that Horizon wasn't working from the very
 20 beginning.
 21 **A.** Information had come through, yes.
 22 **Q.** Hmm. That information came from scores and scores and
 23 ultimately hundreds and hundreds of innocent
 24 subpostmasters who were suffering an epidemic of
 25 shortfalls?
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1 interviewing by the Metropolitan Police, I've attended
 2 them type of courses over the period of time, and
 3 Cartwright King used to have sessions where they go
 4 through whatever's there.
 5 **Q.** We heard at the very beginning about your progression
 6 from Telegraph Officer, Television Inquiry Officer, up
 7 to the Security Team; do you think you were provided
 8 with sufficient training and qualifications?
 9 **A.** I think at the time when we sort of -- you know, for
 10 each role, the training has been -- when I took the role
 11 as the Security and Investigation Manager, it was done
 12 by Royal Mail Group trainers, and it was a course with
 13 the pass marks that had to go.
 14 **Q.** Do you think it was sufficient?
 15 **A.** At the time, I had no reason not to think it wasn't
 16 sufficient for a start.
 17 **Q.** What do you think now?
 18 **A.** I can still cover more -- I've always said, there's
 19 always opportunities to learn more. So from there, if
 20 that wasn't considered sufficient, maybe it should be
 21 a three-week or a four-week course with extra added on.
 22 **Q.** How many weeks do you think you have been trained on
 23 things like disclosure?
 24 **A.** As I say, over the period of time, there's always been
 25 the odd day or two days' seminars where you've gone
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1 **A.** Yes.
 2 **Q.** It came from what they told you but, even before that,
 3 it came from the thousands of calls they made to the
 4 Helpdesk at the National Business Support Centre.
 5 **A.** Yes.
 6 **Q.** You would have been aware of those calls, wouldn't you?
 7 **A.** Not all of them. If there have been calls made, it all
 8 depends on which inquiry. You know, what inquiry are we
 9 talking about at the moment?
 10 **Q.** Well, I'm talking about the thousands upon thousands of
 11 calls, anguished and perplexed calls made by
 12 subpostmasters that they could not balance, that the
 13 system didn't balance, and your department would
 14 obviously have to have been communicating with the NBSC
 15 and also the Horizon Helpdesk.
 16 **A.** They would have been -- the callouts would have been
 17 requested from them to see what issues were raised.
 18 **Q.** You have to communicate with that department because,
 19 integral to your duties in the Security Department, was
 20 the enforcement of the contractual duties of
 21 subpostmasters, wasn't it?
 22 **A.** The call logs would have been accepted, they would have
 23 been requested and there's nothing on the call logs to
 24 indicate that there was any issues with the Horizon.
 25 I would not be communicating with the NBSC team all the
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1 time over that. That's their role.

2 **Q.** But you would have obtained, surely, as part of your
3 investigations, the call logs?

4 **A.** That's right and the call logs would have been
5 interrogated to see what issue was there, and a lot of
6 the time you would say call logs where they've shown
7 about how would they do a passport, DVLA disc,
8 et cetera, anything that would they -- relating to
9 Horizon would be further interrogated.

10 **Q.** You say that?

11 **A.** Yes.

12 **Q.** You and your department, I suggest, on the contrary,
13 ignored anything that didn't fit the narrative that
14 Horizon was working.

15 **A.** That's your suggestion.

16 **Q.** Time and time again, when somebody ended up under your
17 gaze, each solitary, quite often terrified
18 subpostmaster, sitting across an interview desk from you
19 or one of your team, would have been told that they were
20 the only ones with a problem; isn't that right?

21 **A.** No, that's not correct at all. I don't know where that
22 saying the only one is right. As I explained earlier,
23 depending on the branch, as one of the examples given,
24 is that person was the only one in that branch that had
25 any issues. I don't know what -- I've never said that

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1 Rebecca Thomson?

2 **A.** I've seen sight of it but I didn't follow the Computer
3 Weekly.

4 **Q.** That MPs then became involved enquiring about their
5 subpostmaster constituents and Parliamentary questions,
6 mounting pressure: you would have been aware of all of
7 that by the time you signed that statement?

8 **A.** As I said, that statement come from the business.

9 **Q.** You would have been aware, of course, by that time, and
10 you've already mentioned them, Second Sight. So, again,
11 Mr Bradshaw, I ask you to reflect very carefully on this
12 because I don't want to have to put to you something
13 which I haven't put to any other witness before in this
14 Inquiry, but it is obvious that you would have received
15 briefings from those above you, whether they still exist
16 or not remains to be seen, but you would have received
17 briefings from those above you that it was going to be
18 business as usual, keep prosecuting, don't admit
19 anything.

20 **A.** Prosecutions stopped and the -- once the subject matter
21 expert -- they were relying on a subject matter expert
22 to come down, and they said once the subject matter
23 expert had done his part, that they expected it all to
24 go back to normal. But that never materialised.

25 **Q.** Right. Janet Skinner, who sits beside me, whom you

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1 to anybody I've interviewed, that "You're the only one
2 that has this issue". I have never said that and I will
3 stick to that.

4 **Q.** What I'm going to suggest, as well, that you claim that
5 you weren't getting the messaging from the top that you
6 were, as it were, not getting any information fed to you
7 about unreliability with Horizon from the top but that
8 isn't right either, is it, Mr Bradshaw?

9 **A.** That's correct, yeah. I was not aware of any bugs,
10 errors or defects. They'd come down to it but nobody
11 sort of said anything. Second Sight was put in, and the
12 message was that, once they put a subject matter expert
13 in, everything would be back to normal. That had come
14 from the top. From top down or bottom up.

15 **Q.** By 2012, when you were either giving or prepared to give
16 expert evidence, Mr Bradshaw, the problems with Horizon
17 were obvious, weren't they?

18 **A.** I've said before and I will say it again. I am not
19 an expert on the Horizon system.

20 **Q.** The lawyers may have written your statement but you
21 signed it Mr Bradshaw, didn't you?

22 **A.** That was one statement about the Horizon issues that had
23 come -- that is approved that come from the business.

24 **Q.** You would have been aware, surely, of the pressure
25 building up from the 2009 Computer Weekly article by

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1 interviewed together with your colleague Diane Matthews,
2 she made 116 calls to the NBSC about Horizon. You heard
3 that when Mr Blake was questioning you today?

4 **A.** Yeah, and I also said to Mr Blake I had limited input
5 into that. I was there on the day of the interview but
6 Ms Matthews would have had the pre-interview and post --
7 she dealt with everything there. I was there on the
8 day. So anything to do with calls and anything would
9 have been done by Ms Matthews.

10 **Q.** So you had absolutely nothing at all to do with the
11 investigation?

12 **A.** I -- I was there on the day. I didn't do any of the
13 pre-work or the post-work. That would be done by
14 Ms Matthews.

15 **Q.** The Court of Appeal Criminal Division pronounced, when
16 clearing Mrs Skinner of any wrongdoing, that there had
17 been an extraordinary failure to investigate the 116
18 calls she made to the NBSC in a relatively short space
19 of time. You didn't look, did you Mr Bradshaw?

20 **A.** I personally didn't because the Inquiry was Ms Matthews.
21 I was there on the day of the interview.

22 **Q.** Mrs Skinner was persuaded by her lawyer to plead guilty
23 to false accounting in return for the theft charges
24 being dropped and was advised that she wouldn't go to
25 prison if she pleaded to false accounting but was jailed

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1 for nine months immediate custody.
 2 Now, you've heard the catalogue of failures that
 3 Mr Blake put to you. The woman who sits beside me,
 4 completely innocent of any wrongdoing, goes to prison
 5 for nine months. Do you have anything to say to her?
 6 **A.** As I've said, Ms Matthews was the one who dealt with
 7 that thing. If Mrs Skinner has been dealt a wrong blow,
 8 that is completely wrong but I had very little input
 9 into the case.
 10 **Q.** Diane Matthews, your colleague, didn't think there was
 11 a case on theft. She'd have discussed that with you,
 12 wouldn't she?
 13 **A.** Not necessarily, no.
 14 **Q.** She didn't think that Janet Skinner had stolen anything
 15 at all and was of the clear view that there was no
 16 evidence of theft. Are you saying that she would not
 17 have discussed that with you?
 18 **A.** No, no, she would have reported that to the Criminal Law
 19 Team. It was Ms Matthews' inquiry. I had little input
 20 into that inquiry. I was there on the day of the
 21 interview but any pre-work or post-work would have been
 22 by the person looking after that inquiry.
 23 **Q.** So you had nothing to do, for example, with endorsing
 24 the contents of the report?
 25 **A.** No.

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1 responsibility, according to you, for this
 2 investigation, and that decision on theft has nothing to
 3 do with you, you say?
 4 **A.** Nothing whatsoever.
 5 **Q.** What I'm going to suggest, Mr Bradshaw, is that
 6 whoever's responsibility it was, theft was a nasty jemmy
 7 or crowbar to leverage pleas to false accounting, wasn't
 8 it?
 9 **A.** That was the suggestion but, again, I can only say I had
 10 nothing to do with the inquiry. That was done by the
 11 other officer who dealt with the lawyers.
 12 **Q.** But you knew from a point of view of your long service
 13 and your reputation in the Security Department, that
 14 that was a legitimate ploy, wasn't it: charge theft,
 15 a bankrupt charge of theft to squeeze a plea to false
 16 accounting? You were aware of that, weren't you?
 17 **A.** The lawyers, nine times out of ten, would have had two
 18 charges down: theft and false accounting.
 19 **MR HENRY:** Thank you very much, sir.
 20 **SIR WYN WILLIAMS:** Thank you, Mr Henry.
 21 Is it going to be Mr Moloney or Mr Jacobs?
 22 **MR JACOBS:** I'm happy to go. I'm not sure if my microphone
 23 is on.
 24 **SIR WYN WILLIAMS:** I think everybody will want to hear you,
 25 Mr Jacobs.

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1 **Q.** Diane Matthews told the Inquiry that she was shocked
 2 when Janet Skinner was charged with theft; were you?
 3 **A.** As I say, Ms Matthews is the one that saw to her.
 4 I just accept whatever the lawyers, if they've put that
 5 charge in --
 6 **Q.** You accept what the lawyers do, do you?
 7 **A.** On that particular case, the lawyer that -- Ms Matthews
 8 looked after that case. I had very little input, even
 9 afterwards. If I'd -- any charges would only have come
 10 in passing if Ms Matthews had told us.
 11 **Q.** Juliet McFarlane has been described to this Inquiry as
 12 a gentle person; would you agree?
 13 **A.** Yes.
 14 **Q.** So was she malleable? Were you able to persuade her to
 15 do things?
 16 **A.** No.
 17 **Q.** Because theft was a wholly unmeritorious charge, wasn't
 18 it?
 19 **A.** Of course but, as I can say, Ms Matthews dealt with that
 20 inquiry. I had little input --
 21 **Q.** Did you press Juliet McFarlane, Mr Bradshaw, to charge
 22 theft?
 23 **A.** No, because I had little input in that inquiry.
 24 **Q.** So this gentle person charges theft, contrary to the
 25 view of the Investigating Officer who has complete

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Questioned by MR JACOBS

1 **MR JACOBS:** Let me raise my voice until it's on.
 2 Mr Bradshaw, I represent 156 subpostmasters and
 3 mistresses and one of whom is Shazia Sadiq, who sits to
 4 my left today. This morning at about 11.25, Mr Blake
 5 took you to the statement of Jacqueline McDonald, given
 6 in the mediation case; do you recall that?
 7 **A.** Yes.
 8 **Q.** I don't want to turn it up but, essentially, the
 9 accusations that Ms McDonald made against you, she said:
 10 "Stephen Bradshaw told me I was the only one in this
 11 position and that this has never happened before."
 12 She said that after your first visit to your branch,
 13 you returned with a lady called Caroline Richards and
 14 spoke to Katie Noblet, who was running the branch on
 15 their behalf, and you made threats relating to wage
 16 deductions and jail time.
 17 **A.** That's incorrect.
 18 **Q.** Now, I know you've denied this.
 19 **A.** Yeah, it's incorrect for the simple reason -- if you let
 20 me explain why it's incorrect -- is that when -- we were
 21 going for a statement, as normal because she worked in
 22 the branch. The people running the branch were a firm
 23 called Poulton Solutions. They're responsible for
 24 paying the wages. I have no control to take any wages
 25

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1 or deduct any money or even -- and I wouldn't threaten
2 her with any jail.

3 **Q.** I have a different question for you.

4 **A.** Okay.

5 **Q.** My question for you is: have you been following this
6 Inquiry? Did you watch the subpostmasters and
7 mistresses and assistants give evidence in the Human
8 Impact hearings between February and March --

9 **A.** I've seen some of it. I haven't followed it
10 100 per cent.

11 **Q.** Well, Mr Bradshaw we act for 156 subpostmasters and, of
12 those, 49 of them have told us that they were told by
13 the Post Office, by Investigators like yourself and
14 other officials, that they were the only one: 49. 61 of
15 our clients have told us that they were threatened with
16 prosecution.

17 My question to you is that what Mrs McDonald says
18 about you is pretty standard practice in relation to how
19 the Post Office behaved towards subpostmasters?

20 **A.** That's what it sounds like but when I've done anything
21 I will -- sorry, sir, can you just go back? Part of it
22 is I've never threatened anybody with prosecution. At
23 the end of any interview, the people being interviewed,
24 are informed of the next course of action or next steps.
25 And that is that whoever is the Lead Investigator would

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1 Post Office demanded a further £20,000. She was then
2 a victim of cyber fraud, in relation to MoneyGram, and
3 the Post Office wanted to recover nearly £34,000 from
4 her after an audit and the cyber fraud had also affected
5 11 other branches but she wasn't told about that at the
6 time. Do you recall that case?

7 **A.** I'm not sure about cyber fraud. I do remember a case of
8 MoneyGram fraud and that was when a bogus engineer -- is
9 probably the best way to describe him -- was phoning
10 branches up saying they were coming to test the
11 equipment, could they just input certain amounts and
12 when they were put in the end, they'd say "That hasn't
13 worked try 20,000, that hasn't worked try 30,000". That
14 was the case that was dealt by MoneyGram, for their
15 reasons that, once you do it, they will make a payment
16 straight away.

17 **Q.** Let's go to Ms Saddiq's statement, paragraph 72. It's
18 on the screen. She says:

19 "After losing my post offices, my children and
20 I were abused in the street. I went to the Ryton Post
21 Office, which had been my home. I was near the entry to
22 my home when a group of men began shouting at me and
23 threatening me and calling me a thief. They threw eggs,
24 flour and stones at me and my children."

25 Then at paragraph 76, scrolling down, please, she
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1 do a report and that would be sent off to the Criminal
2 Law Team or then Cartwright King and they make any
3 decisions on the next progression of the case.

4 **Q.** I can see what you're saying is that the decision to
5 prosecute wasn't necessarily made by an Investigator, it
6 was done by the lawyers. But my question to you -- and
7 I ask it again -- was that do you accept that telling
8 postmasters that they are the only one -- and we have 49
9 clients who say that's what they were told -- and
10 telling subpostmasters that they could be prosecuted or
11 go to prison -- and we have 61 clients who have said
12 that is how they were treated -- that was pretty
13 typical, wasn't it?

14 **A.** If people in the Post Office, the Investigators have
15 said that, that's completely wrong. I can categorically
16 say I have never said that to people, that "You're the
17 only one".

18 **Q.** Well, let's look at your behaviour, shall we? If
19 I could ask to have a document put up on screen it's the
20 statement of Shazia Saddiq, which is WITN02230100, and
21 page 13 of 16, starting at paragraph 72.

22 While we're waiting for that to come up on screen,
23 Ms Saddiq was the subpostmistress of two branches in
24 Newcastle. She had to pay over £10,000 of shortfalls,
25 which weren't due to be paid but she did anyway. The
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1 goes on to say:

2 "On the evening of the day the eggs, flour and
3 stones were thrown at me and my children, and I was
4 called a thief, we fled our home with just my children's
5 teddy bears."

6 If we could go to paragraph 82, she says:

7 "I have received threatening calls to my mobile
8 phone and emails from Stephen Bradshaw and Brian
9 Trotter. Mr Bradshaw was a Post Office Security Officer
10 and Mr Trotter was a Post Office Contracts Manager."

11 Then she goes on to say:

12 "I have received particularly intimidating telephone
13 calls from Stephen Bradshaw who began calling me before
14 I knew he worked for the Post Office. He didn't
15 identify himself in his calls, he just made demands of
16 me."

17 Now, what I want to put to you is what you did. You
18 would introduce yourself sometimes, you would say,
19 "Where has the money gone? Why won't you talk to me?
20 Why won't you meet me at the branch? I've got people
21 who I want to defund the branch". She would find you
22 aggressive and hang up on you and you would call her
23 back repeatedly and you called her over 60 times during
24 this period; is that right? Do you recall that?

25 **A.** I wouldn't say that is completely accurate. The two
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1 audits, one took place on 26 October, one took place on
2 27 October. I called Mrs Saddiq on 4 November and left
3 a message. I always, on any phone call, I would say who
4 I am and leave my mobile phone. I called again on the
5 8th because I hadn't received a call back.

6 On 10 November Mrs Saddiq called me because I'd sent
7 her an email later on, with the words "Our telephone
8 conversation refers", and on that email is I explained
9 who I was, and it was about arranged in a time or place,
10 as per what my contract was as a role to do
11 an interview.

12 **Q.** That's not true: you hounded her, didn't you?

13 **A.** No, I didn't.

14 **Q.** Well, then let's go to the next paragraph, shall we,
15 let's go to paragraph 84, because this is what happened:

16 "On 29 November 2016 at 13.44 Stephen Bradshaw
17 called me and I refused to speak to him because I did
18 not know who he was or who he worked for. In that
19 telephone call, which was witnessed by my husband on
20 loud speaker core, he called me a 'bitch', which I found
21 extremely distressing."

22 That's how you behaved towards my client.

23 **A.** Completely untrue. I did not call anybody that type of
24 name and she did know who I was because she received
25 an email from me on 10 November.

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1 just yet. If we could go to Ms Threlfall's witness
2 statement and I'm going to ask you about the
3 circumstances of the interview. If we go to
4 WITN02360100, page 7 of 15, please. If we go to
5 paragraph 46. Just waiting for it to come up. So
6 Ms Threlfall is disabled and she is wheelchair
7 dependent. She said:

8 "In August 2010 I had to go for an interview under
9 caution with the Post Office Fraud Investigator, Stephen
10 Bradshaw. The interview took place at a Post Office
11 sorting office in Liverpool."

12 She goes on to say, at paragraph 48:

13 "Upon arrival they left my husband and me in
14 a hallway. We asked for a chair and never received one.
15 I ended up having to sit down on the stairs."

16 This is a disabled lady who uses a wheelchair. She
17 goes on to say at paragraph 49:

18 "The interview room was upstairs. I told them there
19 was no way I could make it up the stairs. In order to
20 make it to the interview room I was placed in a tiny
21 parcel lift."

22 Do you recall that happening?

23 **A.** I recall her going in a lift and that's untrue. In
24 the -- it's a Royal Mail Delivery Office. The chances
25 of being given a chair would be slim because, as you

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1 **Q.** You have shown in your evidence today that you are
2 prepared to be aggressive. You tell people interviews
3 to get up earlier, other people have described you as
4 very confrontational. This is the way you behaved,
5 isn't it, Mr Bradshaw?

6 **A.** That's not correct, no.

7 **Q.** Do you accept you behaved unprofessionally?

8 **A.** No.

9 **Q.** Do you accept that it was part of the culture within the
10 Investigation Team to intimidate --

11 **A.** No.

12 **Q.** -- and abuse subpostmasters?

13 **A.** No, no, a phone call will be made to arrange
14 an interview, at a convenient time and date.

15 **Q.** Well, let's move to another client, Rita Threlfall. She
16 was the subpostmistress of the Ford branch in Liverpool
17 from 1988 to 2010. Can we go, please, to another
18 document. It's POL00107683 and, while we're waiting for
19 that, I'm just going to ask you if you recall her. You
20 interviewed her at the Liverpool North Delivery Office
21 on 10 March --

22 **A.** That's right. I work in Royal Mail Delivery Office.

23 **Q.** That's right, and you recall that?

24 **A.** I do.

25 **Q.** Well, then perhaps we don't need to go to that document

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1 walk in the delivery office from outside, you are what's
2 known as the Callers Office where members of the public
3 collect the mail. The door facing you is where the
4 sorting office floor is, where -- so you have postmen
5 coming backwards and forwards.

6 During the interview letter, they would have been
7 asked to make themselves known to Royal Mail, because
8 that's who it was, either Royal Mail would have brought
9 them upstairs, Mr Knight or myself will have come down
10 to collect Ms Threlfall, but it wasn't a small tiny
11 parcel lift. It's an actual lift, designated wheelchair
12 lift, with the thing, you know, that takes five people.

13 **Q.** Mr Bradshaw, Rita Threlfall is still shaken by this
14 experience. She is watching today. She suffers, she
15 says in her statement, from crippling anxiety and
16 depression which arises, in large part, from the way you
17 treated her. She was too traumatised to give evidence
18 before this Inquiry and Mr Stein, King's Counsel, who
19 sits to right read out these very passages of her
20 evidence on 23 February 2022.

21 The Post Office has not challenged this account.

22 Mr Bradshaw, this happened, whether you want to admit it
23 or not, this happened.

24 **A.** It's not a small parcel lift. I can prove it to you
25 now.

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1 **Q.** You still work for the Post Office, don't you?
 2 **A.** I do.
 3 **Q.** Would the Post Office put a disabled person in a small
 4 parcel lift to attend an interview that was -- that had
 5 been arranged on a floor which they couldn't access
 6 today? Is that current practice?
 7 **A.** Prior to the interview, I was not made aware of any
 8 special requirement and I can only keep repeating that
 9 it is not a small parcel lift. It is wheelchair
 10 accessibility and I can prove it to you now, if you
 11 wish.
 12 **Q.** Well, I have to say, and Rita Threlfall would want me to
 13 say, that you're not telling the truth, are you?
 14 **A.** I've got a photograph here that shows the lift.
 15 **Q.** We'll move on then --
 16 **SIR WYN WILLIAMS:** Well, you've had a generous ten minutes,
 17 if I may say so, Mr Jacobs, and I know these points are
 18 of importance to your clients but I have to be even
 19 handed amongst everyone. So unless it's critical that
 20 you put further questions, can I ask you to come to
 21 a close.
 22 **MR JACOBS:** I can. I do have a couple of questions then,
 23 some very brief questions about Joan Bailey but I will
 24 be very quick, and I have gone on a little longer, and
 25 I apologise, sir.

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1 If we could scroll down to the bottom of that page 8 of
 2 9, please. This is the investigation report in relation
 3 to Ms Threlfall. You say in that section, it's page 8,
 4 please --
 5 I think we'll move on to Joan Bailey, if that's all
 6 right.
 7 Can I ask you to go to POL00057198, page 4 of 8.
 8 This is your investigation report in relation to Joan
 9 Bailey, who was the subpostmistress at the Howey branch.
 10 Do you recall her?
 11 **A.** Oh, yes.
 12 **Q.** You say in that document that -- can we scroll down,
 13 please. You say in the document that Ms Bailey claimed
 14 that she had problems with the system. If we go to
 15 page 5 of 8, you say:
 16 "The merits of the Horizon system were discussed and
 17 it was explained that in a number of court cases the
 18 integrity of the Horizon system had been questioned,
 19 however nothing had been proven in court by the expert
 20 witnesses and that any of the discrepancies were the
 21 result of failings within the Horizon system."
 22 You go on to say at page 7 of 8, if we could go
 23 down, you go on to say:
 24 "Ms Bailey could not produce evidence to satiate her
 25 claim in relation to the Horizon system."

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1 **SIR WYN WILLIAMS:** You have got three more minutes.
 2 **MR BLAKE:** Can I just interrupt, just before Mr Jacobs
 3 begins, can I just say, and it's a matter that's been
 4 made clear throughout this Inquiry, that evidence given
 5 at the Human Impact hearings has not been challenged
 6 because it doesn't hold the same legal weight as perhaps
 7 other evidence. There was no need for anybody to
 8 challenge --
 9 **SIR WYN WILLIAMS:** Well, although it's cutting into your
 10 three minutes, Mr Jacobs, it would have been impossible
 11 for challenges in the proper sense to be made at the
 12 Human Impact evidence. I think we all accept that.
 13 This is not a trial, it's an inquiry, and I have to
 14 make up my mind from hearing competing accounts, without
 15 sometimes the benefit of adversarial cross-examination,
 16 as to what I need to make findings about. Because,
 17 obviously, if I would try to make a finding about what
 18 happened in every individual case, we would be waiting
 19 for a very, very long time for my report.
 20 **MR JACOBS:** Sir, I have to say I do have very firm
 21 instructions from my client.
 22 **SIR WYN WILLIAMS:** No, I follow and I understand. Anyway,
 23 let's move on now.
 24 **MR JACOBS:** Sir, if we could then move to the investigation
 25 report, which is at POL00107683, page 8 of 9, please.

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1 So what you're doing is you're looking at
 2 a subpostmistress who has alleged that the shortfalls
 3 that she had were to do with the Horizon system and
 4 problems and errors in that system. Your response to
 5 her is "There have been a number of court cases where
 6 that has been rejected, so I'm not going to investigate
 7 that and you can't prove that the system wasn't
 8 working". That was your approach, wasn't it? You
 9 required the subpostmistress to prove that the system
 10 wasn't working?
 11 **A.** That was the -- that response was what come from the
 12 business, as has been previously explained on a number
 13 of occasions with that statement. That's the business
 14 response what we were told to say. But also to assist
 15 me to try to find what issues may be with the Horizon
 16 system, I would require somebody to say, for example,
 17 "If you press the F3 key this happens or that happens".
 18 So just to blatantly say "It's the system", it's very
 19 difficult to try and find the starting point to see
 20 what's gone wrong.
 21 **Q.** Okay, can we scroll down to the conclusion, please.
 22 I'm coming to an end -- and I'm aware, sir, of my
 23 time allocation.
 24 You give conclusions and you say:
 25 "Whilst a prima facie case for false accounting

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1 could be established against Mrs Bailey, it may be
2 prudent when all the circumstances are considered and
3 the explanation offered by Ms Bailey at the interview
4 that if all the monies are repaid to the Post Office
5 then consideration may be given to the issue of
6 a caution in this instant."

7 So what you're saying is, effectively, you took into
8 account all of the circumstances, the fact that she'd
9 alleged there were problems with the Horizon system but
10 she couldn't prove it, and you didn't investigate
11 whether there was a problem with Horizon and she was
12 offered a caution simply because you thought she'd made
13 an offer to pay the money back?

14 **A.** No, that was put in as an opinion to the lawyers,
15 because there is a prima facie case of false accounting,
16 because she covered up a loss. That can't be denied,
17 can it? So from --

18 **SIR WYN WILLIAMS:** All right, I've got the point from the
19 document.

20 Thank you, Mr Jacobs. All right.

21 **MR JACOBS:** Thank you, sir.

22 **SIR WYN WILLIAMS:** Mr Moloney.

23 **Questioned by MR MOLONEY**

24 **MR MOLONEY:** Mr Bradshaw, I act for 73 subpostmasters, all
25 of whom have been prosecuted and convicted and all of
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1 **Q.** Yes. You said that statements had been taken from both
2 subpostmasters and the other statement could have been
3 earlier from a man called Liaquat; do you remember?

4 **A.** Yeah, I do recall that name and there was a statement
5 from him.

6 **Q.** Yes. Now, the opening note for the case only referred
7 to Mr Patel as well. Mr Blake showed you that, didn't
8 he?

9 Now, I'm going to try and assist your memory as to
10 who took over after Mr Ishaq, Mr Bradshaw.

11 There was a Liaquat who featured in the case and he
12 did make a statement, as you say, but that Liaquat, do
13 you remember, was Mr Ishaq's assistant in Birkenshaw
14 Post Office?

15 **A.** That was correct, yes.

16 **Q.** Absolutely. He wasn't a subsequent subpostmaster.

17 **A.** No. Sorry, the postmaster was Mr Patel.

18 **Q.** Yes.

19 **A.** He was taken on as what was known as the interim
20 postmaster. He was there and I think he put Mr Liaquat
21 as the officer in charge.

22 **Q.** Right, but there were two subpostmasters, you see,
23 Mr Bradshaw, weren't there? I don't want to take time
24 on this but in an email that Mr Blake showed you from
25 Mr Smith, to you and counsel Mr King, it said:

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1 whom have had their convictions overturned. I want to
2 ask you about three people: Khayyam Ishaq, Della
3 Robinson, who sits next to me, and
4 Ms Jacqueline McDonald -- all three people in whose
5 investigation you were involved.

6 Khayyam Ishaq, first of all. This morning Mr Blake
7 asked you about the issue of whether subpostmasters who
8 came after Mr Ishaq, after he was suspended, experienced
9 problems with the Horizon system; do you remember?

10 **A.** I do.

11 **Q.** The Post Office position was that they had not?

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

13 **Q.** Mr Blake took you to a number of documents, and I'm not
14 going to bring up those documents but I'll remind you of
15 the substance of the questions. Essentially,
16 ultimately, a Notice of Additional Evidence was served
17 on 15 February 2013 and that was referred to in a letter
18 from Mr Smith to the defence, saying:

19 "We enclose in duplicate copies of a Notice of
20 Additional Evidence the statements of Stephen Bradshaw
21 of 11 February 2013 and Abdullah Patel of 13 February
22 2013."

23 Mr Patel was a subpostmaster who came after
24 Mr Ishaq?

25 **A.** He came to another branch, yes.

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1 "Steve is in the process of taking statements from
2 the two subsequent subpostmasters who have not
3 experienced any problems with the Horizon system."

4 You thought that Liaquat was a subsequent
5 postmaster. To save time, I'm just going to remind you
6 now, if I may, and try and assist your memory,
7 Mr Bradshaw, as to subsequent subpostmasters. The
8 first, there was actually somebody there, for a very
9 short time, called Mary, whose surname I don't have, I'm
10 afraid, then Mr Patel. Then the second subpostmaster
11 was a Mr Mohammed Sarwar. Did you speak to him,
12 Mr Bradshaw?

13 **A.** Shortly after that. What date are we on, because around
14 in 2014 --

15 **Q.** Between Mr Bradshaw's suspension -- sorry, between
16 Mr Ishaq's suspension and the trial, Mr Bradshaw,
17 because that's what we're concerned with. Did you speak
18 to a Mohammed Sarwar between Mr Ishaq's suspension and
19 the trial?

20 **A.** I don't recall speaking to Mr Sarwar. My only
21 recollection is that Mr Patel was the interim
22 subpostmaster after the -- when Mr Ishaq stopped being
23 the postmaster, Mr Patel took over and what I was saying
24 was Mr Patel was still in charge, as far as I'm aware,
25 when I went off long-term sick.

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1 Q. Okay. I'd suggest to you that all of the emails
2 suggested that there were two interim subpostmasters,
3 and it would perhaps be a matter of evidence, but
4 Mr Patel first, and then Mr Sarwar. But you did not
5 speak to Mr Sarwar then, Mr Bradshaw?
6 A. I don't recall speaking to a Mr Sarwar.
7 Q. Thank you very much.
8 Secondly, Ms Della Robinson. You interviewed Della
9 Robinson. She sits next to me here. You were with Mr
10 Andrew Wise and you took the lead; do you remember it?
11 A. I remember Mrs Robinson. I am sure that at that inquiry
12 I did interview Mrs Robinson. I'm sure the person
13 I interviewed Mrs Robinson with was a Mr Michael Stanway
14 and a search was conducted by Mr Wise and Mr Ryan with
15 Mr Robinson. They went back to Mr Robinson -- sorry,
16 Mrs Robinson's -- home address.
17 Q. Mr Ryan sits next to Ms Robinson now. Do you remember
18 him?
19 A. From?
20 Q. From these events. That's Mr Ryan.
21 A. No.
22 Q. That's her partner, Mr Ryan --
23 A. I am sorry, the Ryan -- I got mixed up. It's Kevin
24 Ryan, the Security Manager. Anyway, he went back with
25 Mr Wise to conduct the search at the home address.

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1 scenario is that you'll be prosecuted."
2 A. No, I wouldn't say anything like that because it's not
3 my decision.
4 Q. Right. Then, finally, Mrs Jacqueline McDonald. I'd
5 like to take you to your self-appraisal form, one
6 document only to take you to, Mr Bradshaw, and that is
7 POL00165946. It's a document that Mr Blake took you to
8 this morning. Thank you.
9 Now, Mr Blake took you to page 5 and asked you about
10 the interests of the business. I want to ask about
11 page 9, please. It's where we see, "I support, develop
12 & challenge". Thank you very much:
13 "I support, develop & challenge."
14 At number 2, it reads as follows:
15 "On 5 July 2010 at the court case for [and the
16 reference is given] I challenged their reasoning for
17 accepting only a guilty plea for false accounting and
18 not one for theft."
19 This refers back to the same case that Mr Blake was
20 asking you about this morning:
21 "I explained the reasons for continuing with a trial
22 for theft (the integrity of the Horizon system was in
23 question) and that problems would occur for future
24 cases. The defendant denied theft and the money was
25 missing due to the Horizon system ..."

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1 Q. In any event, it was at a Royal Mail office in Salford
2 that you interviewed Mrs Robinson?
3 A. No, it was a post office. It was Salford. Salford
4 Quays, I think it was called.
5 Q. A post office. When you interviewed her, in *Hamilton*
6 *and Others*, the Court of Appeal said the following about
7 the interview:
8 "In her interview under caution Mrs Robinson said
9 that the losses had started about two years before. She
10 stated that she and her partner initially made good the
11 losses from their own funds but, as the losses
12 accumulated, this became unsustainable. From around
13 August or September 2010 she instead declared the
14 amounts on the mutilated, ie unusable, cash line of the
15 accounts. In her defence statements, she said any
16 errors or deficiencies were as a result of her
17 difficulties in using Horizon."
18 Now, I just want to ask you one thing about events
19 after the interview, please, Mr Bradshaw. After the
20 interview, you spoke to Ms Robinson and her partner
21 Michael within that building -- in a canteen, it may
22 assist you -- where there was nobody else around. But
23 you were sympathetic to Ms Robinson and you said to her
24 and Michael, her partner, off the record:
25 "We know you haven't taken the money but worst-case

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1 Then this:
2 "... and if this was accepted, then this argument
3 would give credence to the current campaign by former
4 subpostmasters."
5 Now, you were very explicit there, Mr Bradshaw,
6 about your motives in seeking to ensure that no credence
7 was given to the postmasters' campaign, weren't you?
8 A. No. As I said, and I explained earlier, that's a --
9 Q. It was a flamboyant way of explaining what had gone on
10 on the day?
11 A. Of course, yes.
12 **THE STENOGRAPHER:** One at a time, please.
13 **MR MOLONEY:** Yeah. It can't be, can it, because that's
14 a motivation; it's not a fact. In fact, it's clear from
15 the document that ensuring that no credence was given to
16 the former subpostmasters' campaign was something you
17 were proud of, wasn't it, Mr Bradshaw?
18 A. No, it wasn't. As I said, it's a flowery way of putting
19 your one-to-one type notes. Everybody gets PDRs in
20 these days and have done for a number of years.
21 Q. Jacqueline McDonald, a mother of no previous
22 convictions, was sentenced to 18 months' imprisonment,
23 aged 47, after having no option but to plead guilty to
24 theft after her offer to plead guilty to false
25 accounting was refused on essentially the decision of

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1 you, Mr Bradshaw. You know that, don't you?
2 **A.** Mrs McDonald pleaded guilty to false accounting and
3 then, at a later court, they pleaded guilty to theft.
4 **Q.** Yeah, she'd wanted to plead guilty to false accounting.
5 You persuaded them not to accept that plea --
6 **A.** No, she pleaded guilty to theft. Sorry, she pleaded
7 guilty to false accounting first.
8 **MR MOLONEY:** Thank you very much, Mr Bradshaw.
9 **SIR WYN WILLIAMS:** Thank you, Mr Moloney.
10 There's a loose end which I've been mulling over,
11 over the photograph that Mr Bradshaw wanted to adduce
12 into evidence. We don't have a situation, Mr Bradshaw,
13 where I just accept evidence just like that, so to
14 speak. So if you wish to produce that in evidence, the
15 correct procedure would be for you, assisted perhaps by
16 your lawyer, to make a statement explaining precisely
17 when the photograph was taken and matters of that kind.
18 That can be sent to the Inquiry and I will determine
19 whether or not it's accepted in evidence.
20 It won't be accepted in evidence without me giving
21 the opportunity for Mrs Threlfall herself to consider
22 it, since she has an interest in it. It can then be
23 shown to her and I will determine thereafter what
24 status, if any, it has. So the ball is in your court,
25 so to speak, as to whether you wish to have this
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1 introduced in evidence.
2 So thank you for coming to give evidence, and that
3 concludes a very busy day, I believe, Mr Blake.
4 **MR BLAKE:** Thank you very much.
5 **SIR WYN WILLIAMS:** Tomorrow we revert to the thorny issue of
6 disclosure; is that correct?
7 **MR BLAKE:** That's correct. You'll be hearing from
8 Mr Jackson from Burges Salmon tomorrow.
9 **SIR WYN WILLIAMS:** Fine. Thank you all very much.
10 **(4.30 pm)**
11 **(The hearing adjourned until 10.00**
12 **the following day)**
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<p>Y</p> <p>years' [1] 155/15</p> <p>yes [113] 4/1 4/4 4/20 5/10 6/3 6/8 6/13 6/22 7/16 8/11 8/23 10/6 12/20 12/23 14/3 15/19 15/25 20/21 21/21 22/22 26/12 27/12 31/2 32/10 33/16 39/15 39/18 41/18 42/20 46/25 47/2 48/14 50/15 50/19 50/20 51/3 51/11 54/5 54/6 55/23 56/2 58/1 58/2 59/19 63/16 64/20 66/10 67/4 67/8 71/8 71/14 72/9 72/18 75/2 75/9 78/10 80/5 80/10 80/11 83/14 83/17 83/17 84/12 84/25 85/3 85/16 86/24 92/19 93/2 94/7 100/9 109/10 109/17 111/10 112/15 114/12 118/14 121/24 122/2 128/18 128/25 130/3 131/2 145/13 148/9 148/10 153/9 154/4 164/5 164/12 171/9 174/17 174/18 175/13 175/14 176/13 177/21 185/14 185/15 188/6 191/21 192/1 192/5 193/11 198/13 200/8 211/11 214/25 215/1 215/6 215/15 215/18 220/11</p> <p>yesterday [1] 2/19</p> <p>yet [9] 50/1 82/5 113/21 116/9 119/7 120/3 130/11 164/20 207/1</p> <p>Yorkshire [2] 81/8 89/11</p> <p>you [998]</p> <p>you'd [6] 1/7 47/19 92/14 95/2 151/8 151/20</p> <p>you'll [3] 2/16 219/1 222/7</p> <p>you're [60] 1/11 5/3 8/1 8/7 15/8 16/7 18/4 32/7 34/24 34/24 35/5 35/6 35/21 36/24 36/24 37/11 37/15 37/16 45/24 47/6 47/17 48/6 48/7 50/16 61/21 62/22 64/7 68/14 68/15 68/22 70/25 71/3 71/18 80/11 85/22 96/12 104/12 104/13 106/5 106/11 106/14 110/20</p>	<p>114/13 129/13 129/14 144/8 151/15 157/19 164/12 166/13 171/6 187/9 189/9 194/1 202/4 202/16 209/13 212/1 212/1 213/7</p> <p>you've [45] 7/6 7/9 8/12 8/17 12/24 18/4 18/12 19/24 20/2 25/24 36/8 36/9 36/12 38/9 44/16 54/19 55/15 64/12 71/10 76/16 89/6 90/12 90/21 92/17 93/5 94/9 96/13 97/4 97/5 97/5 100/17 106/11 107/4 109/20 111/25 144/16 163/20 167/1 185/4 190/25 191/3 195/10 197/2 200/19 209/16</p> <p>your [176] 4/16 4/18 4/25 5/1 5/7 5/15 6/9 6/12 6/23 7/1 7/6 7/23 8/16 8/24 12/11 12/18 13/2 16/8 16/16 16/17 19/10 20/2 20/3 21/5 21/8 21/16 24/3 24/7 24/17 24/20 25/14 29/19 29/25 30/18 30/19 35/24 36/2 36/3 36/22 42/1 42/3 42/18 43/8 43/8 44/14 45/6 45/16 46/3 48/12 51/1 51/8 54/13 58/2 59/16 59/20 60/8 60/10 64/3 67/10 68/8 68/9 69/17 69/21 71/2 71/8 71/12 71/16 71/16 74/20 75/3 75/9 75/19 75/23 76/16 77/12 81/5 82/13 82/15 82/23 83/7 83/11 83/12 84/23 85/21 86/21 88/7 93/14 94/17 98/3 98/5 98/20 102/25 103/6 103/12 104/7 110/16 111/14 112/20 113/18 128/16 138/2 139/20 141/15 141/19 141/19 142/1 144/7 144/10 144/14 148/20 150/9 151/9 151/13 155/24 156/1 156/4 157/16 158/4 158/11 159/24 160/5 160/7 160/12 164/2 164/22 164/25 165/15 170/1 170/15 171/10 172/23 173/9 175/14 177/25 178/20 183/7 184/9 184/10 184/22 185/2 185/4 185/16 186/12 186/13 188/12 189/18 190/5 191/17 192/13</p>	<p>192/19 193/2 193/12 193/15 193/16 193/19 194/20 196/1 197/10 199/12 199/13 200/13 200/13 202/18 206/1 209/18 210/9 211/8 212/4 212/8 215/9 216/6 219/5 220/6 220/19 221/16 221/24</p> <p>yours [1] 100/11</p> <p>yourself [27] 13/14 14/11 21/12 42/25 46/3 55/9 56/8 76/19 87/23 95/12 96/2 108/16 117/11 129/2 130/20 132/19 139/24 148/8 152/8 175/24 178/15 181/3 184/5 187/22 188/9 201/13 204/18</p> <p>yourselves [1] 112/25</p> <hr/> <p>Z</p> <p>zero [2] 168/15 168/20</p>		
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