

Thursday, 18 April 2024

1
2 (9.45 am)
3 **MR BEER:** Good morning, sir. Can you see and hear us?
4 **SIR WYN WILLIAMS:** Yes, thank you very much.
5 **MR BEER:** Thank you, may I call Rodric Williams, please.
6 **SIR WYN WILLIAMS:** Yes, of course.
7 **RODRIC DAVID ALUN WILLIAMS (sworn)**
8 **Questioned by MR BEER**
9 **MR BEER:** Good morning, Mr Williams. As you know, my name
10 is Jason Beer and I ask questions on behalf of the
11 Inquiry. Can you give us your full name, please?
12 **A.** Rodric David Alun Williams.
13 **Q.** Thank you very much for coming to give evidence to the
14 Inquiry today and for previously providing us with
15 a very detailed witness statement. Can we look at that
16 witness statement, please. It's WITN08420100. There's
17 a hard copy in front of you. It's 131 pages long,
18 excluding the exhibit sheet, and it's dated 11 March
19 2024.
20 If you can turn, please, to the last page, 131, is
21 that your signature?
22 **A.** Yes, it is.
23 **Q.** Thank you. I think there are some corrections, four,
24 that you wish to make. Can we deal with those in turn,
25 please?

1

1 "environment"?
2 **A.** Yes, please.
3 **Q.** Then, lastly, page 97 and paragraph 195, which is at the
4 top half of the page, five lines in, the line beginning
5 "Their client for the purpose of giving or receiving
6 legal advice", do you wish to insert the word "dominant"
7 before the word "purpose"?
8 **A.** Yes, it's line 1, 2, 3, 4, 5, 6, 7. So "dominant" --
9 **Q.** So can you read the whole sentence you wish to change?
10 **A.** "The same applies to communications between a lawyer and
11 their client or a third party for the [insert
12 'dominant'] purpose."
13 **Q.** Okay, so it's that "purpose", not the earlier one that
14 I'd identified?
15 **A.** Yes, thank you.
16 **Q.** So insert the word "dominant" before the word "purpose"?
17 **A.** Thank you.
18 **Q.** With those four corrections in mind -- there are some
19 minor typographical errors that I'm not going to go
20 through and correct, there are quite a few of those but
21 I'm not going to correct them -- with those substantive
22 corrections in mind are the contents of the witness
23 statement true to the best of your knowledge and belief?
24 **A.** They are.
25 **Q.** Thank you very much. That witness statement can come

3

1 **A.** Thank you.
2 **Q.** Page 18, paragraph 36. At the top of page 18, the
3 sentence, "When I forwarded the email to John Scott and
4 Rob King on 22 May 2014", should that read "2013"?
5 **A.** Yes, that's correct.
6 **Q.** So cross out "14" and write "13"?
7 **A.** Correct, thank you.
8 **Q.** Secondly, paragraph 41 on page 21. In the second line,
9 you say, "I have no recollection of this email or the
10 matter to which it relates but indicates that the basis
11 for seeking recovery was that the amount alleged to have
12 been gained was the proceeds of"; do you want to cross
13 out the word "have been gained was the proceeds of
14 crime" and instead insert the words "be owing was
15 connected to a criminal conviction"?
16 **A.** Yes, please.
17 **Q.** So cross out the words "have been gained was the
18 proceeds of crime" and insert "be owing was connected to
19 a criminal activity"?
20 **A.** Thank you.
21 **Q.** Page 54, please. In paragraph 106 at the top of
22 page 54, and the second line "amount to an audit of the
23 audit processes used rather than a review of the
24 assurance work itself", would you wish to cross out the
25 words "work itself" and instead insert the word

2

1 down. As I've said, the witness statement is very
2 detailed and you've obviously devoted a substantial
3 period of time to the making of it by setting out the
4 relevant events in largely chronological order and
5 adding your recollections where you have them. I'm
6 accordingly not going to ask you detailed questions
7 about every aspect of the witness statement but,
8 instead, take you to some of the more significant events
9 over the past 12/13 years or so.
10 Can I start with your background, please. You
11 joined the Post Office in August 2012; is that right?
12 **A.** Yes, late August.
13 **Q.** You remain an employee of the Post Office?
14 **A.** Yes.
15 **Q.** Specifically, you are the Head of Legal in the Post
16 Office's Remediation Unit?
17 **A.** I'm a Head of Legal in the Remediation Unit, yes.
18 **Q.** There's more than one Head of Legal?
19 **A.** Yes.
20 **Q.** Okay. How many Heads of Legal are there in the
21 Remediation Unit?
22 **A.** At the moment, I think there may be another two,
23 possibly three. I'm not sure, I'm sorry.
24 **Q.** Okay, so you're one of the Heads of Legal within the
25 Remediation Unit; is that right?

4

1 A. Correct.

2 Q. I think you've held that role in the Remediation Unit

3 since August 2020?

4 A. Yes.

5 Q. The Post Office's website suggests that the Remediation

6 Unit has three main functions: compensation and redress

7 for subpostmasters; administering matters related to the

8 appeals of historic criminal convictions; and the

9 provision of full assistance to this Inquiry?

10 A. I --

11 Q. Is that a fair summary of what it does?

12 A. I had thought the Inquiry was separate but it seems

13 correct, yes.

14 Q. If you felt that it was separate, I mean, you work in

15 it, is it separate or not?

16 A. I don't deal with the Inquiry Team so I thought it was

17 separate.

18 Q. Right. So do you deal with compensation and redress?

19 A. I have done previously, yes.

20 Q. Do you deal with matters relating to the appeals of

21 historic convictions?

22 A. I have assisted the company with that, yes.

23 Q. I'm sorry, I missed you there?

24 A. I'm sorry, I have assisted the company with that, yes.

25 Q. Does it follow that, notwithstanding your personal role

5

1 A. Yes.

2 Q. Do you accept that, since joining the Post Office, you

3 remained bound at all times by the SRA's code of

4 conduct?

5 A. I do.

6 Q. If we turn up, please, on the screen, page 11 of your

7 witness statement, paragraph 22, you say in the first

8 sentence you'd:

9 "... often been asked to distil or synthesise

10 information provided from various parts of the business

11 for other audiences within the business, particularly if

12 the information concerns legal issues with which I have

13 some familiarity."

14 Then at the end of the paragraph, you say:

15 "I generally rely on others for the accuracy of the

16 content, especially if it concerns areas outside my

17 expertise, with my role being to 'sense check' it."

18 Yes?

19 A. Yes.

20 Q. That might be interpreted as meaning that your role was

21 limited to one of gathering pieces of paper written by

22 other people together, like a cataloguer of information;

23 is that what you were trying to say?

24 A. Yes.

25 Q. It might be interpreted as meaning that your role was

7

1 in the events which have happened since August 2012, you

2 hold a senior position in the unit concerned with the

3 provision of redress to subpostmasters --

4 A. Yes.

5 Q. -- and with the administration of issues relating to the

6 appeals against their convictions?

7 A. Yes.

8 Q. In terms of your qualifications, I think you were

9 admitted as a solicitor and a barrister in New Zealand

10 in 1995?

11 A. Correct.

12 Q. You worked in that country on civil matters until 1998?

13 A. Yes.

14 Q. From 1999, you worked in civil litigation practice in

15 the United Kingdom and you were then admitted as

16 a solicitor of England and Wales in 2002; is that right?

17 A. Yes.

18 Q. You worked in New York between 2003 and 2006, when you

19 then returned to the UK again to work in civil

20 litigation matters?

21 A. Yes, I came back from New York at the end of 2005.

22 Q. Overall, do you accept, therefore, that you had

23 considerable and wide-ranging experience as a civil

24 litigator in private practice, prior to joining the Post

25 Office?

6

1 limited to summarising the legal advice of others; is

2 that what you were trying to say?

3 A. No, not necessarily. It would depend on the task at

4 hand.

5 Q. So, over the decade period that we're talking about,

6 sometimes you provided legal advice of your own?

7 A. Yeah, I would think that was right, yes.

8 Q. You didn't simply distil or synthesise the legal advice

9 of others?

10 A. Not exclusively but I would have said predominantly,

11 with the matters we're concerned with here.

12 Q. You mainly summarised other people's legal advice in

13 that 10-year period; is that right?

14 A. No, I think that's an oversimplification.

15 Q. You tell us, then?

16 A. I'm sorry, what would you -- I'm struggling to

17 understand, I'm sorry.

18 Q. Yes, it's entirely my fault. What was your role,

19 looking at it as a whole, in the provision of legal

20 advice to the Post Office concerning the Horizon system

21 and matters that concerned it? Did you mainly summarise

22 other people's legal advice and sense check it --

23 A. No, I would --

24 Q. -- or did you provide legal advice of your own?

25 A. It would literally depend. It's a very broad subject

8

1 over a long period of time. My primary role was to
 2 ensure that the company was receiving the advice it
 3 needed that might have come from a variety of sources,
 4 it may have been something I could contribute to. But
 5 the concern was the delivery to Post Office so that it
 6 could act as it saw fit or as it saw it needed to.
 7 **Q.** So it's neither one thing nor the other, it's both,
 8 depending on the context?
 9 **A.** Quite possibly and possibly at the same time. It may be
 10 that I could contribute in addition to formal advice
 11 received but ...
 12 **Q.** In terms of the period before you moved to the
 13 Remediation Unit, so from the time when you joined the
 14 Post Office in August 2012 until, I think, August 2020,
 15 that 10-year period, what was your job title?
 16 **A.** I think it changed halfway through. I was -- I was
 17 hired as, quote, "Litigation Lawyer", I think that was
 18 the title, and then I became Head of Legal, (Dispute
 19 Resolution & Brand).
 20 **Q.** When was that, please?
 21 **A.** I think that was in 2017, it's in my statement.
 22 **Q.** That can come down, the statement that's on the screen,
 23 thank you. Before you became Head of Legal in 2017, to
 24 whom did you report?
 25 **A.** I reported initially -- that's before I became Head of

9

1 a prosecuting authority?
 2 **A.** I don't know that -- I became aware shortly after joined
 3 that it there was prosecution activity, yes. I don't
 4 know about Post Office being a prosecuting authority,
 5 though. I'm not sure about that.
 6 **Q.** I think you're probably now aware that, between 2000 and
 7 2015, the Post Office brought some 850 prosecutions,
 8 resulting in over 700 convictions?
 9 **A.** I'm aware of that, yes.
 10 **Q.** Are you now aware that, between April 2013 and June
 11 2018, over 600 subpostmasters were suspended?
 12 **A.** No, I wasn't aware of that figure.
 13 **Q.** Did you have any role in that period -- that's '13 to
 14 '18 -- in giving advice over the suspension of
 15 subpostmasters?
 16 **A.** I think it's likely that I did, yes.
 17 **Q.** So you were aware that although in late 2013/early 2014,
 18 prosecutorial activity ceased, the Post Office carried
 19 on suspending subpostmasters?
 20 **A.** Yes.
 21 **Q.** What was your role in the suspension of subpostmasters?
 22 **A.** I would -- so the part of the business that would be
 23 responsible for that was a group of people called
 24 Contract Advisers and that team would contact me, as
 25 a member of the Post Office Legal team, from time to

11

1 Legal? Yes, I reported to a Head of Legal.
 2 **Q.** Who was that?
 3 **A.** For a period -- sorry, I don't -- I can't remember the
 4 dates, it was to Hugh Flemington for a period and then
 5 a colleague called Jessica Madron.
 6 **Q.** After you became Head of Legal, to whom did you report?
 7 **A.** I reported to the Legal Director, who was Ben Foat.
 8 **Q.** Was that and has that been for the entirety of the
 9 period from '17 until today?
 10 **A.** Not until today, no. It was until I moved to the
 11 Remediation Unit.
 12 **Q.** Okay. Between August 2012 and moving to the Remediation
 13 Unit, did you become aware of the very high number of
 14 prosecutions that had been and, when you joined, were
 15 still being brought against subpostmasters by the Post
 16 Office?
 17 **A.** I'm sorry, what was the date range again, please?
 18 **Q.** August 2012?
 19 **A.** Until?
 20 **Q.** Until you moved to the Remediation Unit?
 21 **A.** I became aware, yes.
 22 **Q.** When did you become aware of the numbers of
 23 prosecutions?
 24 **A.** I couldn't tell you.
 25 **Q.** When you joined, were you aware that the Post Office was

10

1 time, and ask me for my advice, my support, my input
 2 into a case they may be looking at.
 3 **Q.** So was that whether there were sufficient grounds to
 4 suspend?
 5 **A.** For the most part, that was their decision but they
 6 might discuss a particular case to see what I thought --
 7 yes -- I think yes is the answer. I'm sorry. Yes.
 8 **Q.** So when you were giving this advice, although the
 9 prosecution activity had stopped but the suspension
 10 activity continued, looking at the matter generally, did
 11 you bring into account any knowledge you had -- and
 12 I think we're going to hear in due course it was
 13 an unfolding knowledge, a developing knowledge -- of
 14 bugs, errors and defects in Horizon?
 15 **A.** Not that I specifically recall, no.
 16 **Q.** Do you know whether corporately the Post Office brought
 17 any developing knowledge that it had into account in
 18 that period --
 19 **A.** Um --
 20 **Q.** -- ie "We've stopped prosecuting people, we're carrying
 21 on suspending people, we may be relying on Horizon data
 22 in order to suspended people, should we be doing so?"
 23 **A.** I'm not aware of that, no.
 24 **Q.** You make a point in your witness statement on a number
 25 of occasions that you were not and are not experienced

12

1 in matters of criminal law; is that right?

2 **A.** I would describe myself as "not a criminal lawyer".

3 **Q.** When you were giving advice to senior executives and

4 others in the Post Office, did you make that explicitly

5 clear to them?

6 **A.** I may not have done.

7 **Q.** Why would that be?

8 **A.** Certainly when I joined there was a specialist criminal

9 lawyer. I had been --

10 **Q.** Was that Jarnail Singh?

11 **A.** Yes, that's correct. I had been hired to attend to

12 civil matters and I -- certainly to most of my

13 colleagues, it would be well known that I wasn't

14 a criminal lawyer and had no background or experience in

15 criminal law matters.

16 **Q.** When you say "colleagues", do you mean legal colleagues?

17 **A.** As my first -- yes, yes, I did mean that.

18 **Q.** I'm thinking about your "clients", in inverted commas,

19 even though you're an in-house lawyer. To what extent

20 did you make clear to -- let's restrict it at the moment

21 to senior executives, to whom you were giving advice,

22 that you were not a criminal lawyer or you were not,

23 using my formulation, experienced in relation to matters

24 of criminal law?

25 **A.** I don't recall expressly putting that disclaimer on

13

1 have been in what he wrote and in what he said in the

2 office.

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

4 **Q.** So if, thinking back, you formed an impression of him,

5 you would have thought he would have treated postmasters

6 fairly, would you?

7 **A.** Yeah, it's not something that had crossed my mind so I'm

8 sort of -- I'm hesitating. If I could phrase it as

9 a negative, I wouldn't have thought he'd treated them

10 unfairly. I'm sorry, I'm literally trying to think --

11 trying to cast my mind back to our interaction in the

12 office there and it's -- what you're describing isn't

13 something I observed, so it's hard for me to make

14 a positive statement, I'm sorry.

15 **Q.** How about this then: a conclusion that may be open to

16 the Chairman at the end of the Inquiry when he has heard

17 all of the evidence is that Mr Singh had a defective

18 understanding of the Code for Crown Prosecutors,

19 a defective understanding of his disclosure obligations

20 and the Post Office's obligations and the duties of

21 candour that a prosecutor owes in criminal proceedings.

22 Over your years of dealing with him, did you have any

23 concerns about Mr Singh's competence and suitability for

24 the role of Head of Criminal Law at the Post Office?

25 **A.** Sorry, it's quite a long question. But -- most of --

15

1 things.

2 **Q.** You mentioned Mr Singh. So, by the time you joined in

3 August 2012, I think he was the Head of Criminal Law in

4 the Post Office; is that right?

5 **A.** I think he was our only in-house criminal lawyer.

6 **Q.** Yes, and I think he was described as the Head of

7 Criminal Law, even though he was the only one?

8 **A.** I don't recall him being described that but ...

9 **Q.** Did you share offices with him?

10 **A.** Yeah, we had an open plan office, so, yes, we shared

11 that space.

12 **Q.** He has given evidence before the Inquiry and is due to

13 come back. He has made a number of statements in emails

14 and in correspondence which might reasonably be

15 described as demonstrating disdain for subpostmasters.

16 Was that an attitude of mind which you observed in him

17 at the time?

18 **A.** No, I wouldn't have said that, no.

19 **Q.** Did you instead form the view that he treated

20 subpostmasters and the issues that they were raising

21 with fairness and equanimity?

22 **A.** I don't believe I can comment on that. I wasn't close

23 enough to his work and I certainly didn't observe much

24 interaction between him and postmasters at all.

25 **Q.** Yes, I'm not talking about direct interaction; it would

14

1 **Q.** I'll break it down.

2 **A.** Yeah -- all right, I think I understand it. I'm sorry.

3 I don't think I'm competent to describe -- as I say, I'm

4 not a criminal lawyer, I don't know the extent to which

5 he was acting compliantly with the Prosecutors Code of

6 Conduct, for instance. I'm just not able to do that.

7 **Q.** So your lack of experience in criminal law wouldn't have

8 allowed you to form a view over his competence and

9 suitability to perform the function he was performing;

10 is that right?

11 **A.** I do not believe I'm competent to do that, no.

12 **Q.** More generally, what can you tell the chairman about

13 attitudes within the Post Office's Legal Team to

14 subpostmasters who sought to defend themselves against

15 allegations that they'd stolen money or were guilty of

16 false accounting but who themselves alleged that the

17 shortfalls were due to Horizon? What was the general

18 feeling, if there was one?

19 **A.** I don't think there was a general feeling. I think

20 it's -- I'm sorry, I'm really struggling with this

21 because it's -- I'm trying to picture the work

22 environment which is where I feel you're taking me, and

23 it's -- and correct me if I'm wrong on that. I don't

24 think --

25 **Q.** I am asking you about the working environment, I'm

16

1 asking you about a 10-year period and I'm asking was
 2 there any attitude of mind towards subpostmasters?
 3 A. I wouldn't have thought so, no. There was a lot of
 4 discussion at the corporate communication level about
 5 postmasters being the, you know, the heart of the
 6 company, you know, and, clearly, the central component
 7 of the business, the client/the customer-facing part of
 8 it.
 9 Q. Did that trickle down into the Legal Team?
 10 A. It certainly trickled down to me. I can't speak for the
 11 entire Legal Team.
 12 Q. They're a commodity that needed to be cherished?
 13 A. I wouldn't have described them as a commodity but the
 14 cherished bit, I think, is important, yes.
 15 Q. Okay, they're individuals, men and women who needed to
 16 be cherished --
 17 A. Yes.
 18 Q. -- and treated with fairness at all times?
 19 A. Yes, they're an important part of the business, yes.
 20 Q. Would that be the *esprit de corps* of the Legal Team?
 21 A. I wouldn't have necessarily said that because the Legal
 22 Team were doing lots of things in different spaces,
 23 there were parts of the Legal Team that had very minimal
 24 contact with the postmaster community, for instance.
 25 Q. Again, I'm not talking about direct contact with them.

17

1 asking, over 100 pages, you don't say anywhere that you
 2 did anything wrong?
 3 A. I think I have said I did something wrong.
 4 Q. What was the thing you did wrong?
 5 A. Well, I'm sure I've done others as well. Over 10 years,
 6 I don't think I could bat it perfectly and I wouldn't
 7 want anyone to have the impression that I think that;
 8 things have gone wrong and that's why I'm here.
 9 Q. What's the thing that you think in the witness
 10 statement --
 11 A. It's in the witness statement, I missed a reference to
 12 the possibility for remote access.
 13 Q. In the Deloitte report?
 14 A. In an early Deloitte report, yes.
 15 Q. So you inadvertently missed a sentence or a paragraph
 16 within a Deloitte report --
 17 A. Correct.
 18 Q. -- which spoke about remote access in 2014?
 19 A. Yes.
 20 Q. I think that's the only thing -- I didn't read that as
 21 you saying you did anything wrong because it was
 22 an inadvertent slip?
 23 A. I'm sorry, "wrong" is a very broad word. I may have --
 24 I'm sorry, I --
 25 Q. Okay --

19

1 I'm talking about in the way that we deal, as a Legal
 2 Team, with the complaints and concerns that they are
 3 raising, the subpostmaster community, how, as a Legal
 4 Team, do we respond to them; give us an insight, please,
 5 into the feeling within the office?
 6 A. I would have thought neutrally. What we should be doing
 7 is that no presumption either way. What is the case?
 8 What is happening here? What is going on in this
 9 particular branch? I would have said that -- I would
 10 hope that was the attitude.
 11 Q. So no predetermined mindset, a position of strict
 12 neutrality between the subpostmasters, on the one hand,
 13 and the Post Office, on the other?
 14 A. I think I can only speak for myself with that but that's
 15 something I would hope I had done.
 16 Q. Before we get into the dozen or so topics that I need to
 17 address with you, can we take a step back and look at
 18 some of the written evidence you've given to the Inquiry
 19 and then some of your conduct at the time. In terms of
 20 the written evidence you've given to the Inquiry, would
 21 this be a fair summary: in your witness statement,
 22 firstly, you do not accept that you did anything wrong?
 23 A. Have I said that?
 24 Q. No, no, a summary means you don't read out each word or
 25 don't read out the specific words: you summarise. I'm

18

1 A. Could you be a bit more specific? I'm sorry, I'm sure
 2 I've done things wrong but it would be helpful to have
 3 an understanding of when or what it might have been.
 4 Q. Let's look at in this way: in your witness statement,
 5 you either state or give the impression that you acted
 6 appropriately or in accordance with your duties at all
 7 times, right?
 8 A. That was certainly my intent and my endeavour.
 9 Q. I don't think you identify that any other person did
 10 anything wrong?
 11 A. I don't believe that's my role to judge.
 12 Q. Well, it's not necessarily judging, is it? It's maybe
 13 talking about the conduct of others, without passing
 14 judgement on them?
 15 A. Um --
 16 Q. But it's right, isn't it, in your 137 pages, you don't
 17 identify that anyone else did anything wrong, other than
 18 inadvertently missing the sentence in the Deloitte
 19 report?
 20 A. Well, no, I don't believe I have done that in my witness
 21 statement, no. I don't believe I --
 22 Q. You don't offer any apology to subpostmasters in your
 23 witness statement, do you?
 24 A. I certainly tried to in the first paragraph.
 25 Q. Well, let's look --

20

1 A. Sorry, third paragraph.
 2 Q. Let's look at the attempt then. Is it paragraph 3 on
 3 page 2?
 4 A. Yes.
 5 Q. Let's just read that to ourselves. *(Pause)*
 6 Was that the attempt at the apology you're referring
 7 to?
 8 A. Yes.
 9 Q. You offer deep regret at harm caused by events, rather
 10 than harm being caused to subpostmasters by people or
 11 harm being caused to subpostmasters by people in the
 12 Post Office, or even harm being caused to them by the
 13 Post Office. You offer regret that events caused people
 14 harm, don't you, not people caused them harm?
 15 A. Um --
 16 Q. Is that as far as you were prepared to go?
 17 A. No, that was my attempt to summarise what is quite
 18 a large undertaking in --
 19 Q. Yeah, you probably thought about this carefully, this
 20 paragraph, didn't you?
 21 A. Well, I hope so, yes. I thought carefully about most
 22 of -- I hope I thought carefully about all of my
 23 statement but, yes, this is important. I believe it's
 24 why we're here.
 25 Q. That's as far as you're prepared to go: express regret
 21

1 gone on a long time and, certainly, I can only speak for
 2 me but I would never have wanted this to have lasted
 3 this long for anybody involved. I think, at the
 4 beginning, sorry, back at paragraph 3, I sort of -- I do
 5 say I hope this process helps people find closure and
 6 I say I hope for myself, personally, too.
 7 Q. Well, thank you for that.
 8 Can we take that down from the screen and examine
 9 a miscellany of issues before we look at the substance
 10 of some points to try to see whether they assist us in
 11 determining the nature of your role in all of this. Can
 12 I start, please, with your role in the development,
 13 pursuit and management of a narrative in the media by
 14 the Post Office.
 15 Can we look, please, at paragraph 169 of your
 16 witness statement on page 84. Foot of the page,
 17 paragraph 169, under a heading "Engagement with the
 18 media". You say:
 19 "[The Post Office's Communications Team] was
 20 responsible for [its] engagement with the media. I was
 21 typically the contact for Comms within [Post Office's]
 22 in-house Legal Team if they felt they needed legal
 23 support, which could range from *ad hoc* reviews of
 24 statements they were proposing to make to legal advice
 25 in respect of proposed broadcasts. I would arrange
 23

1 that events caused people harm?
 2 A. I mean, I will go so far as to as say, if I have caused
 3 somebody harm, I'm deeply sorry. That's not why I --
 4 Q. Again, you haven't identified, in your statement, that
 5 you have caused anyone harm or done anything wrong, do
 6 you?
 7 A. No --
 8 Q. You don't identify any reflections or things that ought
 9 to have been done differently, do you?
 10 A. I tried to respond to the Rule 9 Request I had. I'm
 11 sorry, I wasn't --
 12 Q. We asked people whether they have any other reflections
 13 they wish to give?
 14 A. I conclude with the reflection.
 15 Q. Let's look at that. Paragraph 255 on page 131. This is
 16 part of the statement where people address the Inquiry's
 17 question "Have you any other reflections or things you
 18 wish to say?", an open question. You say:
 19 "[You] regret the various processes intended to
 20 resolve [postmasters'] civil law based ... complaints
 21 have not achieved that resolution", and you hope it
 22 happens soon.
 23 Is that your only reflection?
 24 A. I think it's an important one, because -- sorry, it's
 25 not the only one, I think there is another. This has
 22

1 external legal support where that was required, usually
 2 from ... Cameron McKenna whom I had been introduced to
 3 shortly after joining [the Post Office]. My role as
 4 an in-house lawyer was one of legal risk manager, and
 5 this was my focus in [the Post Office's] engagement with
 6 the media."
 7 That can come down. Would I be right, essentially,
 8 to describe you as the point man for media relations in
 9 the Post Office's Legal Team?
 10 A. I think that's fair, yes.
 11 Q. There was extensive involvement by you and other lawyers
 12 in the Post Office's media relations, wasn't there?
 13 A. On some of these matters, yes.
 14 Q. Can we turn to paragraph 175 on page 88. You set out
 15 your understanding of the Post Office's:
 16 "... general attitude and strategy at that time
 17 towards the media, and its aims in dealing with them,
 18 was that the media could and would report on [the Post
 19 Office]. It was therefore important to maintain an open
 20 dialogue with journalists so as to get an insight into
 21 what they might say and try to ensure they reflected
 22 [the Post Office's] position, with matters only being
 23 escalated to formal legal intervention if it was felt
 24 essential to ensure a bland presentation of [the Post
 25 Office's] position in the finished publication."
 24

1 Would you agree that that paints a benign or neutral
2 picture of the Post Office strategy in relation to media
3 relations?

4 **A.** I can't comment on what it portrays. I would not have
5 described Post Office as necessarily benign with its
6 media-facing public image.

7 **Q.** How would you paint or describe Post Office's media
8 strategy, so far as concerns Horizon?

9 **A.** I wasn't responsible for setting strategy, so I would
10 have taken instructions from the Communications
11 Director.

12 **Q.** Your understanding of it?

13 **A.** I think it's -- particularly with the Horizon matters,
14 Post Office felt it had its side of the story to tell
15 and I think there's a feeling that people weren't
16 interested in hearing it or engaging with it, probably,
17 is a better example, a better word.

18 **Q.** So what was its strategy?

19 **A.** I don't know. That would have come from the
20 Communications Director.

21 **Q.** You were engaged in that strategy yourself and you had
22 no understanding of what it was; is that right?

23 **A.** I supported it. Strategy comes from the internal
24 clients and the Legal team would help give effect to it.

25 **Q.** Did they tell you what the strategy was?

25

1 **Q.** If you didn't have an understanding of what Post
2 Office's general attitude and strategy towards the media
3 was, so far as concerned Horizon, can we look at some
4 examples of how you approached the media in practice.
5 I stress these are only examples; time doesn't permit me
6 to go through all material. Can we start, please,
7 with --

8 **A.** Just before we -- I'm sorry -- I'm struggling with these
9 questions a little bit. Can I understand what you mean
10 by "strategy"? Because I'm worried we have a disconnect
11 and I do want to answer the questions properly.

12 **Q.** I haven't got my dictionary with me at the moment,
13 Mr Williams, but I would understand and I intend by my
14 questions the word "strategy" to mean as follows:
15 a predesigned plan that has aims and objectives -- I'm
16 making this up on the hoof -- that has aims and
17 objectives. That's a strategy in my mind. Does that
18 help you?

19 **A.** It does, thank you, and I'm sorry --

20 **Q.** It's just you used the word here, you see?

21 **A.** I appreciate, I'm sorry -- I'm sorry if that's my poor
22 use. I just want to understand -- I'm sorry, I'm
23 interrupting your question. Please.

24 **Q.** Should paragraph 175 read "I did not have
25 an understanding of the Post Office's strategy towards

27

1 **A.** I'm not aware of -- like, if you're thinking that we
2 have strategy documents and clear objectives on some
3 matters, I don't think I saw something quite like that
4 for these matters. So --

5 **Q.** Never mind a written document: an understanding of what
6 Post Office's media strategy was. If you were giving
7 effect to it, how would you know what it was --

8 **A.** Well --

9 **Q.** -- if you haven't been told.

10 **A.** -- I was giving effect to the instructions on
11 a particular matter. I wasn't responsible for setting
12 media strategy --

13 **Q.** I haven't asked you whether you were responsible for
14 setting a media strategy. That's a different question.

15 **A.** I'm sorry --

16 **Q.** I'm asking of what your understanding was of the Post
17 Office's media strategy was, so far as concerned
18 Horizon?

19 **A.** I can't tell you because I'm not aware of one. What
20 I did do is help Post Office respond to certain media
21 Inquiry activities. The most, I guess, prominent of
22 that being the Panorama programme. I helped assist
23 that. Where that sat in Post Office's strategy, which
24 may have issues of brand positioning, et cetera, behind
25 it, I'm not sure. I can't speak to that, I'm sorry.

26

1 the media"?

2 **A.** Following this discussion, I think it may have read
3 better, "My understanding of Post Office's general
4 approach at that time to the media would have been" --
5 and I apologise if I'm getting into sophistry or
6 anything like that but the predesigned plan, I would
7 have accepted if we'd something like that to have had
8 that articulated or presented to me or made clear to me,
9 and I don't recall having that and that's why I've been
10 struggling. I'm sorry.

11 **Q.** Let's look at some examples, then, rather than of engage
12 in sophistry, POL00101923 --

13 **SIR WYN WILLIAMS:** While that's coming up Mr Williams, can
14 I just be clear, was this point man -- to use the
15 expression -- role something you assumed more or less as
16 soon as you joined the Post Office or was it later in
17 time than that?

18 **A.** I -- thank you, sir. It was pretty much at the
19 beginning, I --

20 **SIR WYN WILLIAMS:** Right --

21 **A.** I helped with something unrelated, probably, within --
22 certainly within the first six months of my time.

23 **SIR WYN WILLIAMS:** Fine. So, if I can put it in this way,
24 that part of your work was something that began shortly
25 after you started and continued right through the period

28

1 that Mr Beer has identified?

2 **A.** That's correct, sir.

3 **SIR WYN WILLIAMS:** Fine, thanks.

4 **MR BEER:** Can we start, please, by looking at page 3 of this

5 document.

6 **A.** I'm sorry, I recognise this and it's quite a long email

7 train. Could I have the bundle reference, please?

8 **Q.** E51.

9 **A.** E51. Thank you.

10 **Q.** If we look at the foot of page 3, we can see an email

11 from Nick Wallis, the journalist, dated 16 December

12 2014, to Mark Davies. He was essentially in charge of

13 Post Office's media and communications; is that right?

14 **A.** Yes.

15 **Q.** Mr Wallis says:

16 "Hi Mark

17 "I wonder if ... your colleagues could help me with

18 a few queries."

19 He starts setting them out, yes? This was, I think

20 you'll recall, in the run-up to The One Show broadcast.

21 **A.** Yes.

22 **Q.** Thank you. If we go up the page, you'll see Mr Davies

23 passes it to a wider group of people, including you:

24 "Hi

25 "Another email from the BBC, now raising a series of

29

1 write red paragraphs or text in red against what he has

2 said, okay?

3 **A.** Correct.

4 **Q.** If we go back to his email there, they don't show up in

5 red but I can tell you which ones they are because I've

6 compared the text next to the originals of Mr Wallis'

7 email. If we scroll back to page 3, please, at the foot

8 of the page, so what Mr Wallis wrote was:

9 "Hi Mark

10 "I wonder if you or your colleagues could help me

11 with a few queries.

12 "When was the last time the Post Office did any

13 research into how satisfied or otherwise

14 [subpostmasters] are with the Horizon system? It would

15 be very helpful to know the scope of that research and

16 its results."

17 Then you wrote:

18 "Post Office constantly receives feedback on Horizon

19 from its tens of thousands of users through a variety of

20 sources."

21 Then over the page:

22 "The primary sources are NBSC, Horizon Service Desk,

23 Branch User Forum and NFSP. Feedback is also delivered

24 through a variety of [business as usual] processes ..."

25 Next paragraph:

31

1 new questions."

2 Yes?

3 **A.** Yes.

4 **Q.** Then if we go to the foot of page 2, we can see you

5 replied 16 December 2016, "Rodric Williams wrote", and

6 then if we go to the top of page 3, you say:

7 "Without having read them closely, only that this is

8 getting ridiculous -- we're being asked to address

9 an ever expanding range of serious issues, on

10 a piecemeal basis, with constantly shifting [goals] in

11 an attempt to get Mik Wallis a story which is 'news'.

12 "On the upside, they suggest we're starting to land

13 our points -- this line of enquiry is focused on the

14 'user-friendliness' of the Horizon, not the accuracy of

15 what it records or what we do with that information.

16 "I'll revert on the substance shortly."

17 If we go, please, to page 1. At the foot of the

18 page, your further reply to the same group of people,

19 again on 16 December, at just after 4.00, so it's about

20 an hour and a half after your immediate reaction and you

21 reply to your colleagues in detail on what's said, if we

22 scroll down. You say:

23 "Hi -- my substantive responses [to Nick Wallis']

24 latest questions are embedded in red."

25 You essentially go through Mr Wallis' email and

30

1 "That feedback is then implemented through regular

2 reviews and upgrades ...

3 "Ultimately though, any feedback has to be

4 considered in the context of the entire user base -- we

5 wouldn't roll out a (likely costly) system change

6 because a few agents asked for it. No business would."

7 Then you wrote this:

8 "We don't need to do research on Horizon -- it's the

9 system we provide to our agents ... and require them to

10 use. If agents don't like it, they can choose not to

11 provide services for us. The vast majority of our

12 agents and other users work with it just fine, and we're

13 not required to bespoke our Point of Sale accounting

14 system to the whims of each individual agent."

15 In relation to your reply, "We don't need to do

16 research on Horizon -- it's the system we provide to our

17 agents ... and require them to use. If [they] don't

18 like it, they can choose not to provide services for

19 us", was that your view: subpostmasters could either use

20 Horizon or leave?

21 **A.** Yes, because --

22 **Q.** Like it or lump it?

23 **A.** No, not necessarily but it is the system that was used

24 across many thousands of branches and I think tens of

25 thousands of terminals. That is the system that Post

32

1 Office provided.

2 Q. Well, it's obvious that it's the system that the Post
3 Office provided. That's just stating a fact. What
4 you've done is gone further. You've said, "We don't
5 need to research Horizon. They can either use it or go
6 away".

7 A. But I was commenting immediately above, it makes it
8 quite clear that we do actually receive feedback.
9 I think by this it's market research on users that --
10 it's just saying we don't need to, I don't believe
11 there's an obligation -- and I'm speaking as a lawyer --
12 I don't believe there's an obligation on Post Office to
13 do that.

14 Q. Was this part of your thinking in your time in this
15 decade, if agents, if subpostmasters don't like Horizon,
16 they can just down tools and leave. That's their
17 remedy.

18 A. I don't think that's capturing what I've said here.
19 I have to say, I can't exactly remember what my mindset
20 was in --

21 Q. You agree that --

22 A. -- in 2014 but -- sorry --

23 Q. That's what it tends to suggest, doesn't it?

24 A. No, sorry, what I'd say the vast majority of the network
25 was using the system fine. On a network that scale,

33

1 back would help, did you?

2 A. Well, that was -- no, this was a comment, internally, to
3 colleagues. I wasn't saying this is what the
4 response --

5 Q. What's the purpose of saying it to colleagues, then?

6 It's to help in the formulation of the response?

7 A. Correct.

8 Q. Is this part of the strategy and approach that you
9 described in your witness statement of at all times
10 maintaining a willingness to maintain an open dialogue
11 with the media?

12 A. I don't think they're connected yet because the way it
13 works is -- the way I'd recall it working for us is
14 things are circulated for input, views are heard and
15 then a position taken, at which point that feeds into
16 what is taken back to the media.

17 Q. Let's move on. We can skip the next paragraph where you
18 draw an analogy. We go back to some text that Mr Wallis
19 wrote. So his question was:

20 "Is your statement about the vast majority of
21 [subpostmasters] ..."

22 The point there, the statement he is referring to,
23 is a statement that the Post Office put out in
24 an earlier reply:

25 "Is your statement about the vast majority of

35

1 it's impossible, I would think, to bespoke it to each
2 individual's preferences --

3 Q. Well, it's not their preferences. You call them the
4 whims. Is that what you thought the subpostmasters were
5 complaining about or that was the basis of their oral
6 and written complaints: whims? A "whim" meaning
7 an eccentric flight of fancy?

8 A. That is the word I used at the time.

9 Q. You understand it to mean that?

10 A. Um --

11 Q. A whim?

12 A. Yes. That's the word I used.

13 Q. Did you think subpostmasters were on eccentric flights
14 of fantasy?

15 A. No.

16 Q. Why did you use the word "whim"?

17 A. Because it struck me as being possibly very bespoke,
18 very individualised requests for person preference. But
19 I used the word "whim" and I think, in doing that, I was
20 trying to trivialise the specific complaints being
21 raised.

22 Q. Is this an example of what we read about in your witness
23 statement, where you said that the Post Office's
24 approach and strategy was to maintain an open dialogue
25 in the media. You thought saying something like this

34

1 [subpostmasters] not having any problems with Horizon
2 based on customer feedback or purely on the volume of
3 successful transactions?"

4 Then we see your comments:

5 "Our customers don't use Horizon.
6 "If by 'customers' [Nick Wallis] means
7 agents/Horizon users, we could point to the churn rate
8 of agents -- ie if agents aren't happy with Horizon,
9 they can leave the Network."

10 That's the same point you made above:

11 "I think this would only show general churn, ie it
12 wouldn't distinguish those that left because of Horizon
13 as opposed to any other reason (eg retirement). Still,
14 if the Network is fairly stable, a low churn would
15 suggest that it's only a minority of agents that are
16 unhappy with the system, which is consistent with what
17 we have seen through the Scheme.

18 "I get the sense from speaking to a number of
19 [subpostmasters] that they don't like the system, they
20 don't trust it and they live in fear in what the Post
21 Office might do if they get something wrong with it."

22 This is Mr Wallis speaking.

23 "It may be because I only come into contact with
24 [subpostmasters] who are having problems that I keep
25 hearing this, so it would be useful to know the other

36

1 side of the coin."
 2 You say:
 3 "Same points as above.
 4 "On the 'they lived in fear ...' point, it is wrong
 5 for an agent to deliberately cover up branch losses and
 6 falsify the figures the agent enters into the system."
 7 So in these paragraphs, in your response to your
 8 colleagues, you're making the same point, aren't you,
 9 that the measure of Horizon's reliability or success can
 10 be seen through the number of subpostmasters that are
 11 leaving the business --
 12 A. I think it's rather the other way. It can be seen by
 13 those who are staying within the business.
 14 Q. -- ie it must be a good system because, otherwise, more
 15 would leave?
 16 A. Well, at least an acceptable system.
 17 Q. Was that your best evidence base, when you were writing
 18 this two and a half years into your role, for the
 19 reliability of Horizon, the number of subpostmasters
 20 that were leaving the Post Office?
 21 A. No, I'm looking for -- I was looking for things that
 22 could contribute to the discussion. What was -- and
 23 maybe this is getting -- it's not quite a strategy --
 24 I'm sorry. There was -- my recollection is that there
 25 was a feeling that the complaints being raised about

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1 so I think that may have been --
 2 Q. I'm sorry?
 3 A. I think they that may have been a very poorly worded
 4 email.
 5 Q. Which word did you intend to use instead of "puerile"?
 6 A. I'm sorry it's on two screens.
 7 Q. Yeah, we can look at the bottom of the third page and
 8 the top of the -- that's it. Question at the bottom of
 9 page 4 --
 10 A. I think I know why I'm saying it now, sorry. You know,
 11 "SPMRs love using Horizon and trust it implicitly".
 12 It's a very high bar. I don't know too many people who
 13 really love their computer systems, I'm sure there are
 14 people. But I think that's what the expression is going
 15 to. Do we have data that says people love using
 16 Horizon? I -- I --
 17 Q. He's asking, isn't he, for data that backs up
 18 a statement that the Post Office made that the vast
 19 majority of subpostmasters are not having any problems
 20 with Horizon?
 21 A. Well, no, he is there asking for -- he is asking for
 22 evidence that postmasters love using Horizon and trust
 23 it implicitly, and I think I read that as setting
 24 an impossibly high standard for us to have evidence --
 25 information that would show that. I don't -- that's

39

1 Horizon were being raised by a small number, a small
 2 proportion of the network and that it was being used
 3 successful by the vast majority of the network every
 4 day, aggregating up to -- and I think I can still
 5 remember, hopefully, the numbers -- 6 million
 6 transactions a year, to -- sorry, 6 million transactions
 7 a week, 2 billion a year, across the 11,500 plus or
 8 minus branches, and we were seeing a very small number
 9 of complaints. That --
 10 Q. He is asking for the data, isn't he, in this last
 11 paragraph:
 12 "If you have any data which shows the vast majority
 13 of [subpostmasters] love using Horizon and trust it
 14 implicitly, it would be useful to have that
 15 information."
 16 So he is asking the very question that you have just
 17 referred to. Let's see what your response is over the
 18 page, please:
 19 "This is puerile."
 20 Why did you think that Mr Wallis' question, "If
 21 you've got data that shows that if subpostmasters like
 22 using Horizon and trust it, it would be useful to have
 23 that information", why you think that was puerile;
 24 "puerile" meaning childish, immature or petty?
 25 A. I'd say, looking at it today, it doesn't feel puerile,

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1 what I think I'm saying there.
 2 Q. You carry on:
 3 "The best I can think of is to show that agents
 4 aren't voting against Horizon with their feet ..."
 5 That's the third time you've referred to that.
 6 A. Yes.
 7 Q. Was that the best evidence?
 8 A. I don't know. Certainly, when I wrote it, it was the
 9 best I could think.
 10 Q. Overall, would you agree that, without focusing on the
 11 individual paragraphs, in this part of Mr Wallis'
 12 request he's asking for some data, some material, that
 13 backs up a statement that the Post Office had made that
 14 the vast majority of subpostmasters are not having any
 15 problems with Horizon?
 16 A. I'm sorry, could you repeat that? Sorry, I was reading.
 17 Q. In this part of his request, he is asking, generally,
 18 for some evidence, some data, some material, that backs
 19 up a statement that the Post Office had made that the
 20 vast majority of subpostmasters are not having any
 21 problems with Horizon. Overall, the best you can come
 22 up with is that they're not leaving the business?
 23 A. That's the best I can come up with. I think earlier on
 24 we saw there was references to the NBSC, call log data,
 25 et cetera. I think that would be better management

40

1 information than churn rate, which was another strand of
 2 management information that may support, I guess, user
 3 acceptance, if not happiness.
 4 **Q.** Can we move on to some of your other contributions to
 5 Post Office's media responses. POL00150306. Can we
 6 look at page 2, please.
 7 **A.** Sorry, I think this is another one that may have been --
 8 it wasn't in the core bundle either, can I have the
 9 bundle reference?
 10 **Q.** E86, if you want to look at it in hard copy.
 11 **A.** Thank you.
 12 **MR BEER:** Sir, I should just explain to you that the little
 13 delays that are occurring are because Mr Williams has
 14 said that he wants to be given the tab numbers in the
 15 bundles and read the documents in hard copy, rather than
 16 looking at them on the screen.
 17 **SIR WYN WILLIAMS:** Yes, I have understood that from the
 18 exchanges, Mr Beer. Thank you.
 19 **THE WITNESS:** I'm grateful, sir.
 20 **MR BEER:** E86. Look at page 2, please. If we scroll down,
 21 please. We see again the Mr Wallis email, yes.
 22 **A.** Mm-hm.
 23 **Q.** Can you see that, the 16 December one? This has got no
 24 writing on it, okay? So it's the same originating
 25 email?

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1 something else?"
 2 You agree that he is there expressing the same
 3 sentiments as you, albeit you hadn't written them yet --
 4 **A.** Err --
 5 **Q.** -- ie put up with the system or leave?
 6 **A.** It's an option.
 7 **Q.** He says:
 8 "I like this email that Mel [that's Melanie
 9 Corfield] sent me earlier, from a [subpostmaster] ..."
 10 Then he sets it out.
 11 Then, in conclusion, at the foot of his email he
 12 says:
 13 "... I'm not sure it merits more than a cursory
 14 response."
 15 Then, if we scroll up, please, you say to him:
 16 "I swear, you are the only person I've met more
 17 cynical than me, and then by some considerable margin
 18 ..."
 19 He then replies to you:
 20 "Thank you, sir, I take that as a serious badge of
 21 honour [smiley face]."
 22 Then you say:
 23 "As intended!"
 24 Did you treat this as a joke?
 25 **A.** No, far from it.

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1 **A.** Okay.
 2 **Q.** But this chain goes off in a different direction, okay?
 3 **A.** Thank you. I appreciate that.
 4 **Q.** If we scroll up, please. We see Mark Davies' "sending
 5 it on email", we saw earlier. Then scroll up, please,
 6 we see a reply from Patrick Bourke, who was he?
 7 **A.** He was -- is a colleague, I don't know what his title
 8 was at that time. He had worked -- I think he had come
 9 into Post Office to work on the Mediation Scheme and
 10 I think is now -- he's certainly in the Communications
 11 Team, I think maybe the Public Affairs Director, but I'm
 12 not certain of that.
 13 **Q.** At the time, I think his title was Government Affairs
 14 and Policy Director; would that sound right?
 15 **A.** That does sound right, thank you.
 16 **Q.** Let's look at what Mr Bourke thought at about Mr Wallis'
 17 email.
 18 "Apart from its breathtakingly facetious tone, this
 19 looks to me to be clutching at straws a little ...
 20 "That some subpostmasters don't like the system is
 21 inevitable; I don't particularly like working in Old
 22 Street with its rodent problem. 'Living in fear' is
 23 going too far in my view. They chose to sign a contract
 24 to provide services in an honest and diligent way.
 25 Rather than living in fear, would it not be better do

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1 **Q.** Was this attitude bravado by you, a competition between
 2 you and Mr Bourke, the Government Affairs and Policy
 3 Director, on who could be more cynical about
 4 subpostmasters?
 5 **A.** No.
 6 **Q.** Why did you exchange these emails, then?
 7 **A.** When you're working under pressure, sometimes you write
 8 an email that, when you look back at it 11 years
 9 later -- sorry, I can't do the maths -- nine years
 10 later -- you regret the expression. But I think emails
 11 exchanged just between two colleagues like that from
 12 time to time occur.
 13 **Q.** So are we to put this in the "banter" category: "top
 14 bants" between mates?
 15 **A.** I'd say yes.
 16 **Q.** The truth of it is that you adopted the same attitude of
 17 mind, didn't you? "We're deeply cynical about all of
 18 these subpostmasters. The best thing they can do is, if
 19 they've got any complaints about our system, they can
 20 leave". That was your and his attitude of mind, wasn't
 21 it?
 22 **A.** No, I think you're reading too much into an email
 23 exchange there, with respect.
 24 **Q.** Why didn't we see in these emails, some self-reflection?
 25 "Have we got any surveys of whether subpostmasters have

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1 difficulties? What do the statistics show on the number
 2 of calls made to various helpdesks that we offered? Is
 3 there an analysis of those? Are there any levels of
 4 satisfaction with those? What proportion of complaints
 5 about Horizon are successfully remediated?"

6 **A.** I'm --

7 **Q.** That's what he was asking for. That kind of thing,
 8 wasn't it?

9 **A.** Well, I -- I'm sorry, that's a list I think you've read.
 10 That's not in there. But I imagine it is along the
 11 lines of -- well, I don't know what Nick Wallis was
 12 asking for there. He asked for, what I saw, data of
 13 people loving the system and trusting it implicitly.

14 **Q.** So you focused on the "love" bit and thought narrowly --

15 **A.** In the entirety of the email --

16 **Q.** -- "Have we got any surveys or that that shows that
 17 Horizon is loved by subpostmasters? No, and that's
 18 a puerile question. End of story".

19 **A.** No, when you look back at the exchange, you can see
 20 other people have contributed to it and there is
 21 reference to NBSC call log datas, and the like, that
 22 provide sources which could be explored further if
 23 that's the direction that would be taken in response to
 24 this.

25 **Q.** Can we look, please, at POL00101968, B202. If we go to
 45

1 So this is 12 days in advance.

2 Then if you just scroll through it, rather than
 3 reading it in detail, she sets at a summary of the
 4 issues to be covered in the programme. Can you see
 5 that?

6 **A.** Yes.

7 **Q.** If we scroll on still further, there is a relatively
 8 detailed summary and then a series of questions. If we
 9 go to page 8, please, and scroll down, please, we'll see
 10 that this gets forwarded to you.

11 **A.** Yes.

12 **Q.** We can see your reply on 7 January. You say:
 13 "I haven't yet looked at the detail of the email,
 14 but see that the BBC want to film ...
 15 "There is a lot happening next week [next
 16 paragraph]."
 17 Then:
 18 "Not really a legal issue I know, but given the
 19 BBC's approach to date, the close engagement it has with
 20 JFSA, and the timing of the piece, I smell a rat ..."
 21 What was the rat that you smelled?

22 **A.** The timing seemed --

23 **Q.** Smelling a rat means that somebody is trying to deceive
 24 you or harm you by artifice?

25 **A.** No.

47

1 page 10 at the bottom, please. Thank you. Sorry,
 2 behind with the bundles.

3 **A.** I'm sorry, what is the tab?

4 **Q.** Do you wish, Mr Williams, to look at this in a bundle?

5 **A.** Yes, I'm sorry. My bundle broke open so I'm trying to
 6 put the paper back. Which tab is it, please?

7 **Q.** B202.

8 **A.** Thank you. I'm sorry, I've only seen these this morning
 9 so I'm still familiarising myself. Thank you. Thank
 10 you, sir.

11 **Q.** Page 10 at the foot of the page and over to page 11.

12 **A.** Yes.

13 **Q.** This is a document you exhibited to your witness
 14 statement.

15 **A.** Yes, thank you.

16 **Q.** You'll see that Jane French, who was then, I think, the
 17 BBC's Current Affairs Editor, sending an email on
 18 7 January to Mr Davies, copying Mr Wallis in. So this
 19 is after The One Show programme had been aired and is
 20 instead about a forthcoming Inside Out programme.

21 If you just scroll through, she says to Mr Davies:
 22 "Thank you ... I am now writing to invite you to
 23 give us a filmed interview for our regional current
 24 affairs programmes Inside Out which will be reporting
 25 the subject on 19 January on BBC One."
 46

1 **Q.** What did you mean by you smelt a rat?

2 **A.** It looks like it's organised. I think something is up.

3 **Q.** What was up?

4 **A.** The timing of this seemed to be well aligned to put
 5 pressure on the Post Office.

6 **Q.** Why was there a problem with the BBC reporting issues
 7 with the Horizon system and with the Post Office being
 8 given an opportunity to respond?

9 **A.** There's nothing wrong with that.

10 **Q.** What was the rat, then? What was the deception being
 11 practised?

12 **A.** I've said I don't think any deception was being
 13 practised. That's not what I've said.

14 **Q.** What were you intending to say by, "given the approach
 15 to date, the close engagement the BBC has with the JFSA
 16 and the timing, I smell a rat"? What did you think was
 17 going to happen?

18 **A.** I'm sorry, I thought I'd answered that. The timing
 19 seemed convenient and --

20 **Q.** Convenient to who?

21 **A.** Postmaster complainants.

22 **Q.** Right and, therefore?

23 **A.** I'm sorry, you've lost me. You keep saying -- I don't
 24 think there's any deceptive -- I'm not using that in
 25 this respect. That's your interpretation. I'm sorry

48

1 if --

2 Q. What did you mean by "smelling a rat"?

3 A. I'm sorry, I've tried to answer that a couple of times,

4 it's the timing.

5 Q. Well, try a third time, then. What did you mean by

6 "smelling a rat"?

7 A. That the timing --

8 Q. What did --

9 A. -- seemed calculating --

10 Q. -- think the BBC was up to?

11 A. They were going to put a piece that was timed with

12 events that may have taken place at a working group

13 face-to-face meeting. It looked like there was building

14 up to a media broadcast or something along those lines

15 that would have advanced the postmasters' complaints.

16 Q. Can we turn to POL00105856. That's tab E57. Can we

17 start, please, by looking at page 4.

18 A. Sorry E5?

19 Q. 57.

20 A. Thank you. I'm sorry, I'll go straight to the bundle in

21 future. I'm sorry. Thank you.

22 Q. If we just scroll down, you'll see it's an email from

23 Melanie Corfield who was in the Comms Team; is that

24 right?

25 A. Correct.

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1 (which McLachlan patently is), especially if they have

2 an axe to grind ..."

3 Then you set out a proposed reply to the BBC.

4 In what respect did you think Professor McLachlan

5 had an axe to grind?

6 A. So the expression "axe to grind" was one I gained from

7 the Post Office's media lawyers and it's a term of art.

8 I became aware of a type of contributor who may have

9 a vested interest in the piece.

10 Q. So it was a term of art, "axe to grind"?

11 A. That's my understanding and that, I think, was my use of

12 it there.

13 Q. Does that mean that anyone who had a vested interest,

14 including, for example, subpostmasters or, indeed, the

15 Post Office, couldn't make a contribution?

16 A. No. What I think it lent itself to -- and I'm sorry,

17 it's been a while since I've looked at this sort of

18 material on that -- it just meant, I'm thinking of the

19 BBC Guidelines that their contributions needed to be

20 treated with greater care. I'm paraphrasing and

21 apologies to the BBC if I am misconstruing that or

22 misstating it, but that's my recollection.

23 Q. So it was to point out to the BBC that they shouldn't

24 regard Professor McLachlan as impartial and to remind

25 them of their guidelines in that respect; is that

51

1 Q. If we scroll up, please, she says -- we can see who this

2 is addressed to when we look at the "reply all" later:

3 "Now that they have finally revealed the names of

4 interviewee 'experts', including Charles McLachlan,

5 expert defence witness in the *Misra* case, I think we

6 should use this [to] go back to Ceri ..."

7 We can see from the context of the email as a whole,

8 this was the beginning of a debate on the approach that

9 should be taken to Ceri Thomas, who I think you may

10 remember, in mid-2015, would have been the editor of

11 Panorama? Yes?

12 A. That's not something I recall, but no.

13 Q. In any event, she, Mel, is talking about a proposed

14 contribution by Professor Charles McLachlan, yes?

15 A. Yes.

16 Q. Then if we go to page 2, please, at the bottom, we can

17 see what the title of the email was, "Another throw of

18 the dice at Ceri Thomas?" You say:

19 "All -- I want to think about this overnight, but

20 I'm not inclined to offer anything directly because of

21 the CCRC (sorry, but we've learned a lot more about the

22 programme since I sent my last email on this!)."

23 Then over the page to the top of page 3:

24 "Instead, we could use as a hook the BBC Guidelines

25 in and around relying on people who are not impartial

50

1 a summary?

2 A. That's probably fair, yes.

3 Q. Thank you. Can we move on, please, to POL00152725

4 I think that's E91.

5 A. Thank you.

6 Q. Go to page 2.

7 A. Sorry, did you say --

8 Q. E91.

9 A. I'm sorry, that doesn't seem -- I have POL 152725, this

10 seems to be different.

11 Q. Yeah, POL00152725 of E91.

12 A. I have a -- I'm sorry, I beg your pardon, I do have a --

13 Q. They're double-sided pages?

14 A. I'm sorry.

15 Q. On 3 July 2015, Melanie Corfield wrote to you, "Not sure

16 if any use":

17 "Was just checking on something and came across the

18 below from Coomber Rich solicitors ..."

19 You'll see that she cuts in something in that

20 paragraph from that firm of solicitors website:

21 "... in 2013 when interim report came out. It just

22 confirms they are looking at appeals then regarding the

23 cases they had (think *Hamilton* and *Misra* but can't

24 remember!) on the basis of information from the

25 investigation so thought it might be of use to you at

52

some point. It also makes clear case-by-case basis, a point I am still trying to make journals and politicians understand!!! How can anything be decided in any other way?!"

Then back to the first page, please, foot of the page, you say:

"Thanks Mel.

"You might recall that the (first?) One Show piece at the end of last year interviewed a criminal ... solicitor (who may be from that firm) ... It is telling they have not been involved in any appeal.

"[And] yes, each case has to be looked at on its own facts."

Then scroll up, please. She replies to you:

"Oh yes -- ... that was Issy Hogg who is from this firm, I think. I believe she gave the incredible quote that 'They don't look like criminals'. From a media point of view I am astounded that no one ever seems to ask the defence lawyers why their clients pleaded guilty and why they have not tried to appeal. Seems it is only the Post Office who get asked the questions! Oh well -- sunny weekend ahead hopefully and Panorama story still not showing in the schedules ..."

Was it a commonly held view within the Post Office to think it was only the Post Office who got asked the

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Mark is. You'll see that he is a writer at the Shropshire Star, or at least he was in mid-2015. If we scroll up to the text of his email, he says:

"Further to our conversation a few minutes ago, I am following up the story that Second Sight has written to the Government saying that its findings of its report on the Horizon system have been misrepresented. The story is on page 10 of yesterday's Telegraph, and I have spoken to Ron Warmington of Second Sight who has confirmed his concerns have been misrepresented after [the minister] said: 'Second Sight produced two independent reports -- one in 2013 and the other earlier this year -- both of which found there was no evidence of systemic flaws in the system'.

Mr Warmington has said that the term 'systemic' can only be used when referring to a constant fault, and that is why the report said there were no systemic faults.

"However, he says the report clearly said there were circumstances where a combination of factors could lead to a fault in the system which could account for some of the discrepancies which have resulted in civil and criminal proceedings against [the postmasters].

"[Could I have] a response ..."

Then if we scroll up, please. That gets forwarded

55

questions?

A. I can't speak for Post Office. I'm --

Q. The people with whom you dealt within the Post Office?

A. I don't recall that, no. I mean we were being asked questions and I'm sure other people were as well.

Q. Was it a common view within the Post Office that focus should instead be asking the defence lawyers why their clients pleaded guilty and why they've not tried to appeal?

A. I'm sorry, could you repeat that?

Q. Was it a common view within the Post Office that the focus should instead be on asking defence lawyers why their clients pleaded guilty and why they had not tried to appeal?

A. Again, I don't think I'd -- I don't know who else was in Post Office but that's not something I was turning my mind to, I don't think.

Q. Was there a view, an attitude of mind, that the Post Office was being got at by subpostmasters and the media?

A. Maybe not by postmasters but I think it is probably fair to say we were feeling a little bit "got at" by the media. I think that's fair.

Q. Can we move on to POL00152777, please, the next tab, E92. Look at the second page, at the foot of the page and, if we just scroll down a little bit, we can see who

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by Melanie Corfield to some people not including you, and then gets forwarded by Mark Underwood of the Complaint Review and Mediation Scheme to you and, if we scroll up, please -- keep scrolling -- if we go to the top of the page, you say:

"... I'm uncomfortable with the final sentence."

We'll look at what that is in a moment:

"I know we've used it in a draft [Panorama] statement, but I want to think on it overnight to make sure the line both the Shropshire Star and [Panorama] properly covers the [two] bugs we identified for [Second Sight], which did affect ... balances."

So if we scroll down, please. You see in the bold text there the proposed reply that Ms Corfield was going to give back to the Shropshire Star, and you had said you were uncomfortable with the final sentence, despite it being used previously. The final sentence is "This work" -- that's over three years there have been exhaustive investigations into a very small number of complaints:

"This work has provided overwhelming evidence that the computer system was not responsible for the missing money in these Post Office branches."

Why were you uncomfortable with using the sentence,

"This work has provided overwhelming evidence that the

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1 computer system was not responsible for any missing
 2 money"?

3 **A.** I think the use of "overwhelming" is a very, very high
 4 bar and it's not an exact one but a very high one, and
 5 we should be trying to make sure that we don't make
 6 statements that can't be substantiated, corroborated or
 7 defended.

8 **Q.** Would a simpler explanation for you being uncomfortable
 9 with that final sentence be that it wasn't true?

10 **A.** No, I don't know that it wasn't true. As I say, it was
 11 just a very high bar and capable of different
 12 interpretations. This is a media line, I think, and I'm
 13 naturally -- sorry, I'm cautious, it's -- you're being
 14 hostage to fortune when you set your stall out that
 15 high.

16 **Q.** So it was the strength with which the sentence was
 17 expressed rather than the substance of what was being
 18 said that you were uncomfortable with?

19 **A.** Also, I guess, the conclusion, you know. I'm not sure
 20 that that would necessarily have led to that. I'm not
 21 sure it didn't. I just think it is -- it was too
 22 uncertain. I think -- well -- or potentially
 23 indefensible.

24 **Q.** Was it because, by August 2015, this is a matter we'll
 25 look at later today and maybe tomorrow morning, that you

57

1 Trust."

2 What were the numerous opportunities that the Post
 3 Office had offered to the BBC that would have
 4 facilitated a fairer programme?

5 **A.** Do you know who the author of this is? I only received
 6 it quite late.

7 **Q.** It's unattributed.

8 **A.** Okay, thank you. I think there are two offers that
 9 I can remember, one was initially for a talking-head
 10 interview, so live-to-camera interview, and another was
 11 to share some material from a file relating to
 12 a particular contributor to the programme.

13 **Q.** Was it those two points that led to the view that the
 14 Panorama programme was unbalanced and misleading or was
 15 it about the content too?

16 **A.** No, it was definitely the content too.

17 **Q.** It was the content too?

18 **A.** Yes.

19 **MR BEER:** Thank you.

20 Sir, that's an appropriate moment to break, please.

21 Can we break until 11.30, please?

22 **SIR WYN WILLIAMS:** Yes, of course, thank you very much.

23 **MR BEER:** Thank you.

24 (11.16 am)

(A short break)

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1 knew that the work of Second Sight hadn't provided
 2 evidence, let alone overwhelming evidence, that the
 3 computer system wasn't responsible for missing money?

4 **A.** Sitting now, I can't say that that's a connection but it
 5 may have been.

6 **Q.** Okay, I'll move on. POL00113008. This is tab E65.

7 **A.** E65?

8 **Q.** Yes.

9 **A.** Thank you.

10 **Q.** This a chronologically of the Complaint Review and
 11 Mediation Scheme, I think produced by the Post Office
 12 itself. Can we go, please, to page 13. Four boxes from
 13 the top, there is a reference to a meeting on
 14 4 September 2015, between you, Mark Davies and the BBC's
 15 most senior executive, James Harding, and the chronology
 16 records that:

17 "At that meeting Post Office acknowledged the
 18 legitimate public interest in scrutiny of the Post
 19 Office, including the BBC. Nevertheless Post Office
 20 made the point that the Panorama programme was
 21 unbalanced and misleading in its presentation of the
 22 facts, and that the BBC failed to take up the many
 23 opportunities the Post Office had offered which would
 24 have facilitated a fairer programme [and it] reserves
 25 [the] right to make a formal complaint to the ...

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1 (11.30 am)

2 **MR BEER:** Good morning, sir. Can you continue to see and
 3 hear us?

4 **SIR WYN WILLIAMS:** I can, thank you.

5 **MR BEER:** Thank you very much.

6 Mr Williams, just one last document, please on this
 7 topic of media relations.

8 **A.** Thank you.

9 **Q.** POL00232517, and that's at E104.

10 **A.** 104, thank you.

11 **Q.** If we just look at the top of page 3 to get the context,
 12 there's an email from Mark Davies to you and others
 13 referring to that meeting that we looked at before the
 14 break:

15 "Rod and I met James Harding, BBC Director of News
 16 and Current Affairs, and Ceri Thomas, Editor of Panorama
 17 today as you know. The BBC's Head of Complaints also
 18 attended.

19 "It was useful to have the opportunity to land our
 20 points about the BBC approach and the reality of the
 21 cases featured. I am really grateful to [you] for
 22 attending and his excellent support, and Mel for her
 23 pack.

24 "[Mr] Harding listened and responded positively
 25 without making any commitments, as we would expect. But

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1 we have landed key points."
 2 If we go to page 2, please. If we scroll down to
 3 later on 4 September, Mark Davies says:
 4 "I would like to review the complaint again ..."
 5 This is the complaint against the BBC that was being
 6 formulated:
 7 "... actually to make it even more comprehensive.
 8 I think we need to formally note the views and
 9 involvement of Nick Wallis."
 10 Then over the page to page 1, at the foot of the
 11 page -- that's it. Mr Davies says on an email sent to
 12 Susan Barty and copied to you:
 13 "... I think we should build out a section [this is
 14 in the complaints letter] on Nick Wallis' involvement
 15 in. In a nutshell I would be looking to say that (a)
 16 Mr Wallis has clear views which threaten BBC
 17 impartiality (b) this point is underlined by the BBC
 18 previously requesting that he remove a blog post on this
 19 issue (c) we were not informed that he was involved in
 20 Panorama, which seems a breach of good faith and (d) we
 21 know he was involved because he had boasted about it on
 22 his Facebook page. In adding this point I think we
 23 should provide examples (Mel has them) outlining where
 24 he has gone, on his blog, beyond journalism and into
 25 campaigning against [the Post Office].

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1 A. Yes, I probably was, yes.
 2 Q. Can we turn to a different topic, please, and that's
 3 your relationship with external legal advisers. That
 4 can come down for the screen.
 5 By 2016, you had been legally qualified for
 6 21 years; is that right?
 7 A. I think so, yes.
 8 Q. You'd been admitted as a solicitor in this jurisdiction
 9 for 14 of those years?
 10 A. 2016, that would be correct, yes, plus or minus.
 11 Q. You were, by that time, specialised and expert in civil
 12 litigation?
 13 A. I certainly had experience and, obviously, 16 years of
 14 it in civil litigation. There's always a somebody more
 15 expert than me in this field, I've found.
 16 Q. Can we look, please, at POL00038852, that's B260, if you
 17 want to look at it. This is, if we just scroll down to
 18 the foot of the page, an email from Amy Prime, who was
 19 a solicitor at Bond Dickinson and, if we go to the top
 20 of the page, please, we can see it's her email to you of
 21 10 May 2016, copied, amongst other people, to Andrew
 22 Parsons, the partner at Bond Dickinson?
 23 A. Can I just check something. I don't think that date is
 24 correct. I think they is -- we struggled to find this,
 25 and I think -- I'm happy to be corrected by somebody --

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1 "I would also use this letter to formally question
 2 why when approaching contributors, the BBC has never
 3 featured the views of the NFSP. Even if the NFSP has
 4 declined approaches, there is on the record footage of
 5 George Thomson talking about the issue."
 6 At this stage, did you agree Mr Wallis held views
 7 that threatened the impartiality of the BBC?
 8 A. That's -- those aren't my words, no.
 9 Q. That's why I was asking you whether you agreed that
 10 Mr Wallis held views that threatened the impartiality of
 11 the BBC?
 12 A. I didn't hold that view. I didn't turn my mind to
 13 whether they did or didn't.
 14 Q. Did you turn your mind to whether or not the BBC had
 15 acted or not acted in good faith?
 16 A. Not on good faith, no. I didn't turn my mind to those
 17 concepts.
 18 Q. Was there a kind of bunker mentality amongst the senior
 19 leadership in the Post Office in relation to Horizon and
 20 the media's treatment of it?
 21 A. I don't know that I can speak for senior management but
 22 I do think, certainly from where I was sitting, it did
 23 feel a bit bunker mentality, yes. I can't speak for the
 24 senior executives.
 25 Q. Were you in the bunker?

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1 I think that it's using the American date referencing so
 2 I think it's 5 October.
 3 Q. Okay, fine.
 4 A. That becomes -- sorry, I beg your pardon, I just wanted
 5 to -- and, if I'm wrong about that, I apologise but
 6 that's my understanding.
 7 Q. In any event, in 2016, either in the summer or autumn,
 8 Amy Prime, a solicitor at Bond Dickinson, was emailing
 9 you with a request for instructions on a request for
 10 disclosure in relation to Post Office's Investigation
 11 Guidelines, yes?
 12 A. Yes.
 13 Q. Can we look at the email, please. She says in the
 14 email -- and I should say that Ms Prime, who was then
 15 recently qualified, had sent a draft of this email to
 16 the partner Andrew Parsons first and he contributed to
 17 the drafting of it. Documents that the Inquiry has make
 18 that clear and that's a matter we will take up with
 19 others later in the phase.
 20 In any event, Ms Prime says:
 21 "Freeths have requested that we provide them with
 22 Post Office's Investigation Guidelines since 1998
 23 (including any revisions to date). In the earlier round
 24 of disclosure we did not provide the guidelines since we
 25 wished to confirm whether the documents were covered by

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1 privilege. Brian Altman has confirmed that they will
2 not be covered by privilege and as such the guidelines
3 will, at some point, have to be disclosed.

4 "We have reviewed both the most recent version of
5 the guidelines (which were adopted in January 2016) and
6 the prior version (which were adopted in August 2013).

7 Of note, the 2013 version (attached, password ..."

8 Then, if you scroll up, please, you can see that
9 there is, indeed, "Conduct of Criminal Investigation
10 Policy v2 300813", as an attachment. Scroll back down:

11 "Of note, the 2013 version (attached ...) provides
12 'Should the recent Second Sight review be brought up by
13 a subject or his representative during a PACE interview
14 the Security Manager should state: "I will listen to any
15 personal concerns or issues you may have had with the
16 Horizon system during the course of this interview".'

17 "Freeths will more than likely use this statement as
18 an opportunity to confirm that the Post Office has
19 responded to postmasters using stock answers (a point
20 which has already been raised in relation to the
21 helpline) and further could be spun to show that Post
22 Office was not taking issues with Horizon seriously and
23 were trying to ignore any issues which were raised.

24 "Although we may face some criticism later on, we
25 are proposing to try and suppress the guidelines for as

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1 Q. Secondly, that suppression should be done in a way that
2 looked legitimate to the outside world, agree?

3 A. Yeah, that's what it says, yes.

4 Q. And, third, that you were to say if you disagreed that
5 disclosure should be suppressed but, at the same time,
6 be made to look legitimate to the outside world?

7 A. Quite -- I don't think it quite says that but that's
8 certainly the gist, yes.

9 Q. There's no record of you saying that you did disagree,
10 saying, "Don't do that, it's wrong", is there?

11 A. There's no record -- as I say, I think say this in my
12 statement, I did not recall -- I have no recollection of
13 this email, which is regrettable, because I was --

14 Q. Are you used to getting emails from other lawyers
15 saying, "We should suppress documents"?

16 A. I'm used to getting a lot of emails. As I say, I don't
17 recall reading this at the time. It was clearly sent to
18 me, it was clearly addressed to me but I do not recall
19 and the reason why I mention the date is, when the
20 Inquiry provided this to me, I'll be frank and say it's
21 a concerning email. I --

22 Q. You searched your emails like frantic, no doubt, didn't
23 you?

24 A. I did and I couldn't find anything around it until the
25 dates were swapped and I looked around October and

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1 long as possible on the grounds that the most recent
2 version is not relevant since it post-dates the
3 investigations complained of and it would require a full
4 disclosure exercise to piece together all historic
5 revisions of the guidelines. We thought it would be
6 best to bring this to your attention early.

7 "For now, we'll too what we can to avoid disclosure
8 of these guidelines and try to do so in a way that looks
9 legitimate. However, we are ultimately withholding
10 a key document and this may attract some criticism from
11 Freeths. If you disagree with this approach do let me
12 know. Otherwise, we'll adopt this approach until such
13 time as we sense the criticism is becoming serious.

14 "If you would like to discuss ... please don't
15 hesitate to call."

16 So, your solicitors had both the 2013 and the 2016
17 versions of the investigations guidelines, yes.

18 A. That's what it seems like, yes.

19 Q. Indeed, they attach the 2013 version to the email, yes?

20 A. That's what it shows, yes.

21 Q. They made a proposal that was essentially summarising
22 threefold: firstly, that the Post Office should, through
23 its lawyers, suppress disclosure for as long as
24 possible; do you agree?

25 A. That's what it says, yes.

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1 I did, indeed, receive it. It was in my inbox.

2 Q. And you didn't reply to it?

3 A. No, I --

4 Q. You didn't say, "no, don't do that"?

5 A. I did not reply to it but I do not recall reading it
6 carefully. I don't recall it in any size, shape or
7 colour.

8 Q. Your actions are the more important thing rather than
9 your present recollection?

10 A. That's true, mm-hm.

11 Q. What we can say is that you didn't reply --

12 A. Correct.

13 Q. -- saying "No, lawyers shouldn't suppress relevant
14 documents, they shouldn't do so in a way that is made to
15 look legitimate, and they certainly shouldn't do so
16 because the content of the document is concerning and
17 might be used by our opponent to make a good argument
18 against us". You didn't do any of those things, did
19 you?

20 A. No, it's -- I certainly didn't reply in writing. I --
21 as I say, I don't recall. I don't recall calling,
22 either, which is the invitation there. I don't recall
23 any action on this so, no, I did not take any action in
24 response to this.

25 Q. Had the Post Office given Bond Dickinson instructions to

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1 take an approach like this generally to disclosure,
 2 ie a rigid hard line approach to disclosure?
 3 **A.** No, we had not -- I do recall at many stages --
 4 disclosure was a quite a big issue, as I think does
 5 become clear through -- hopefully it comes through
 6 through some of my evidence, and it was a challenge for
 7 Post Office because we held most of the documents and
 8 we'd be doing the lion's share of the disclosure and,
 9 like all large disclosure exercises, it's a challenge
 10 for the claimant to have an idea of what you have but
 11 don't know quite what it is because they don't have it.

12 Andy and I used to talk about, well, if we couldn't
 13 do something what else could we offer that would
 14 approximate it? We'd say the "no, but" approach.
 15 That's the recollection that I have of our approach to
 16 the disclosure to it and, as I say, this is inconsistent
 17 with that, I accept that, which is why I find it odd.

18 **Q.** Why was the Post Office suppressing disclosure of
 19 documents, which it considered may harm its defence?

20 **A.** Well, the reasons being advanced are in the email.
 21 I think this was made before formal disclosure orders so
 22 this was in pre-action stage but --

23 **Q.** But they'd asked for this. They'd asked for, I think,
 24 30-odd classes of material and one of them was
 25 investigation guidelines. This had been identified, the

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1 an excuse because that's what would have been desirable,
 2 the first line is it says it's not urgent, to consider
 3 as and when you get a chance, and, as I say, I do recall
 4 I was dealing with something very urgent at the time
 5 but, sitting here today, I'd like to say I did that, but
 6 I didn't, sir --

7 **SIR WYN WILLIAMS:** But I'm right, aren't I: there should
 8 have been a prompt reply and it should have been --

9 **A.** Yes.

10 **SIR WYN WILLIAMS:** -- "You can't possibly do that"?

11 **A.** Yes, your Honour.

12 **SIR WYN WILLIAMS:** Fine, thank you.

13 **MR BEER:** There's another view of it, the penultimate
 14 paragraph that says, "If you disagree, you must get in
 15 touch"?

16 **A.** Yes.

17 **Q.** So it was like a negative resolution, "we're going to do
 18 this, unless you pipe up"?

19 **A.** Um --

20 **Q.** And you didn't disagree?

21 **A.** I did not disagree.

22 **Q.** Thank you. Can we move on.

23 POL00043169. That's E37. Again, I'm still on the
 24 topic of dealing with external legal advisers. Just
 25 a bit of context before we dive in. We're now many

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1 2013 version, as containing a passage that might harm
 2 the Post Office's defence. That's the only reason given
 3 for not disclosing it.

4 **A.** That's what I've seen there, yes.

5 **Q.** Is that a legitimate reason for not disclosing
 6 a document, that it might harm your defence?

7 **A.** Not to me, it's not, and I would hope that wasn't my
 8 view then, either. I don't believe it was but, as
 9 I say, I don't recall any reaction to this.

10 **Q.** Did you enjoy such a close relationship with your
 11 solicitors in the Group Litigation that it was perfectly
 12 acceptable openly to discuss the suppression of
 13 disclosure and covering it up by making it seem
 14 legitimate in emails of this kind?

15 **A.** I have to say, no, and this is inconsistent with most of
 16 my dealings on this matter with our solicitors.

17 **Q.** But you didn't do anything to pull Bond Dickinson up on
 18 this, did you?

19 **A.** On this, no.

20 **Q.** Can we move on, please.

21 **SIR WYN WILLIAMS:** In reality, Mr Williams, this email
 22 should have had a prompt response from you to the effect
 23 of "You can't possibly do that"; that's right, isn't it?

24 **A.** That's what I'd like. When I looked at this, it is
 25 quite possible -- and I offer this in no way as

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1 years later in October 2019, and the Post Office had
 2 managed to conduct the Horizon Issues Trial, which was
 3 concerned with whether there were known errors in
 4 Horizon, without disclosing to the claimants and to the
 5 court many important Known Error Logs, okay?

6 **A.** All right, thank you.

7 **Q.** Can we turn to page 4, at the bottom, please. We can
 8 see your email of 19 October:

9 "Ben [this is to Mr Foat],

10 "Please find an updated Board update. Set out below
 11 are the key notes to address the points from your email
 12 on 'what would it take to get all of [the KEL review]
 13 done by next week', and 'what is the scope [of a Fujitsu
 14 audit] that would diminish the risk [of creating
 15 documents that would then need to be disclosed to the
 16 claimants]'. "

17 Then reading on:

18 "Generally ...

19 I'm afraid there's some text in here, in the email
 20 we've been provided that makes it harder to read but
 21 I think we can get the sense to it. You say:

22 "... I have stressed (firmly) to the HSF and [Womble
 23 Bond Dickinson] teams the importance of this workstream.
 24 It's being escalated to Alan Watts at HSF and Tom Beezer
 25 at [Womble Bond Dickinson] to make sure our Board's

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requirements are met", and they were both cc'd.

"The key legal risk here is the ongoing duty in the GLO litigation to disclose adverse documents, which may not exist (or which we may not have been aware of) but for taking the action now contemplated, especially in the context of material, we had not previously seen."

Then under the headed in "New KELs", you say:

"[Womble Bond Dickinson] are assessing the risk over the weekend of the 94 newly disclosed high risk KELs. By the middle of [the] week, Counsel will have reviewed these KELs in detail and given a view on whether they are likely to cause the Horizon trial to be recommended/the judgment delayed (the Counsel team being best placed to identify the impact they may have on the trial they conducted)."

So trial over 94 high-risk KELs that had been newly disclosed after the evidence had finished and counsel were looking at "Are we going to have to recommence the trial, ie here's some more evidence, or ask the judge to delay giving judgment?"

Then:

"In relation to the other KELs not used at the trial (ie the majority of the around 14,000 new KELs), the key risk of reviewing these is that claimants have not yet asked for the documents, so by reviewing them now we are

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doing the claimants' work for them.

"The legal advice therefore is we should not review the 14,000 other KELs unless the claimants ask for them or counsel's review of the 94 high-risk KELs warrants a wider review."

Then if you just read the next couple of bullet points to yourself.

Then under "Audit", at the end:

"The best way to mitigate the risk of generating adverse/disclosable documents through an audit is to keep it focused on Fujitsu's Litigation Support provided to date, with any operational audit to follow once the litigation has been resolved and its associated disclosure duties [continued]."

You'll see that, in the course of the legal advice that you gave to Mr Foat there, you said that, in relation to the 14,000-odd new KELs, there was a risk, if Post Office reviewed them, that you were doing the claimants' work for them because the claimants hadn't yet asked for those documents, yes?

A. Yes, that's what that says.

Q. Was that an approach that you took to disclosure generally: unless the other side asks for a document, there is no need to review your own material to see whether it meets the test for disclosure?

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A. No -- sorry, I -- I want to make sure I'm saying no to the right thing. We -- that was not my understanding of our approach to disclosure in the litigation.

Q. Was it your approach to disclosure of the Known Error Logs, the around 14,000 of them, at this stage?

A. No, it -- well, it depends. Are you talking -- which -- are you talking about the new KELs or the --

Q. I'm talking about the 14,000 that were not the 94 high-risk ones that had been disclosed?

A. I'm sorry, I'm confusing myself. Sorry, could you ask the question again, please?

Q. Yes. Was it then your approach that, in relation to those 14,000 Known Error Logs, a relevant consideration was whether the claimants had asked for them or not?

A. In trying to work out what Post Office was to do with these, clearly thought it was a relevant consideration.

Q. Why is that a relevant consideration?

A. Is it something that the business wants to do?

Q. In law, why is it a relevant consideration?

A. Sorry, I'm losing you. What is it that the -- the claimants do it or not? We'd had -- we'd operated -- so we have a duty to disclose adverse documents. That's my understanding.

Q. Can you discharge that duty without looking at the documents?

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A. I suspect it would be difficult to.

Q. And that's what you were proposing not to do?

A. But I don't think that's necessarily -- because the disclosure was focused to whatever had been ordered. We --

Q. None of this had been ordered --

A. But across the entire business not every corner was turned. But you'll also see -- so doing the claimants' work for them, I'm trying to think why I said that --

Q. Let's have the document back up on the screen.

A. I have it in front of me.

Q. POL00043169. Under "New KELs", second bullet point. First bullet point you deal with the 94 that have already been disclosed and counsel are assessing whether this is going to cause some rather catastrophic consequences for the trial that's already taken place.

A. Yes.

Q. Second bullet point:

"In relation to the other KELs [the 14,000-odd] the key risk of reviewing [them] is that the claimants have not yet asked for [them] by reviewing them ... we are doing the claimants' work for them."

My question is really simple. You were suggesting that there's no need to review your own material to see whether it met the test for disclosure, weren't you?

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1 A. That's the -- I'm also saying that -- so that seems --
2 on the next bullet point, that seems to be supported by
3 legal advice and I'd like to -- I don't remember that
4 advice but that's the sort of thing I'd like to refresh
5 myself on because it seems to underpin what the
6 statement above it is and I'm afraid I don't recall it.

7 Q. So you are saying that the next bullet point, the legal
8 advice, is not referring to the legal advice that you
9 are here giving in this email. It's referring to
10 somebody else's legal advice that you're regurgitating?

11 A. Quite possibly. I'm struggling with the -- and I've
12 highlighted it, so I've clearly brought it to the
13 attention. I'm trying to work out now why I wrote that
14 in the way I did, and I'm -- I think I say sort of quite
15 often when I do it -- and in a circumstance like this
16 it's highly likely I'd have been doing it -- is that
17 this issue of the new late-found KELs was pretty
18 alarming and generated a lot of activity and requests
19 for information to understand what was going on.

20 You can see we'd instructed it looks -- it sounds
21 like counsel plus two law firms were engaged on it.
22 I would have been -- and I think this is -- sort of
23 looking at this email, I remember the time. I don't
24 remember drafting this email but I remember the time.
25 I would have been trying to find out what's happening,

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1 so that our associated disclosure duties have
2 concluded"?

3 A. Yes, I do say that.

4 Q. So what you're saying, whether yourself or in
5 synthesising the views of others, is, "Don't look at
6 14,000 new KELs, because they might contain material
7 that's adverse to our case and, in that respect, we
8 would it be doing the claimants' work for them. Instead
9 wait until the litigation is over and our disclosure
10 duties have passed, then conduct an operational audit".

11 A. That is what it says. Although, looking at that, it
12 wouldn't have closed off any disclosure duties, as
13 I understood them, in any --

14 Q. Why does it say, "Wait until the litigation has been
15 resolved and its associated disclosure duties concluded",
16 then?

17 A. I agree, that's what it says.

18 Q. Can you help us with this at all, please?

19 A. I'm sorry, what's the question, please.

20 Q. It appears to suggest that the Post Office's suggested
21 approach from its lawyers, either from you or
22 communicated through you, is that we shouldn't look at
23 documents that might contain adverse material because we
24 might have to disclose them; instead, let's wait until
25 the litigation is over and our duties of disclosure have

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1 what needs to happen and synthesise that into digestible
2 bullet points for people to understand the position so
3 that we either proceed with known risks, with knowledge
4 of the known risks, or decide not to do things with
5 knowledge of those risks, as well.

6 So on the -- when I say the legal advice, my guess
7 is -- and I'm sorry, again, I can't remember the
8 specifics -- but being told not to do it, I think, will
9 have come from a collection of the lawyers involved,
10 which includes me, as well as the external lawyers.

11 Q. I take it if this advice does originate from others,
12 it's not advice that you disagreed with?

13 A. I mean, quite clearly, if we were reviewing it, we would
14 be doing the claimants' work for them. As soon as we
15 reviewed, we would see something; if it was adverse, we
16 had duty to disclose it, so that's --

17 Q. Isn't that a reason to do something, rather than not to
18 do it, in the legal system?

19 A. I'm not sure. I'm not sure. It would depend on the
20 circumstance and I'm thinking, in this circumstance, it
21 seems to have been suggested that that was acceptable.

22 Q. When you take it together with the final bullet point
23 under "Audit" about mitigation of risk, you say,
24 essentially, "Before we look at these KELs, before we
25 audit them, we should wait for the litigation to be over

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1 ceased to arise.

2 A. That's what it says. I'm sorry, I'm missing your
3 question. I'm sorry, I'm being thick.

4 Q. Do you think that's appropriate?

5 A. I'm saying it's a way to mitigate the risk.

6 Q. Risk of what: disclosing adverse documents?

7 A. My understanding -- and I'm happy to be corrected -- my
8 understanding of civil litigation is the duty of
9 disclosure in the litigation ends with the litigation.
10 Once the litigation concluded, we didn't have a duty to
11 disclose to Freeths --

12 Q. That's why you have to discharge the duty in the
13 litigation before it's concluded?

14 A. But that is what was -- that work was being
15 undertaken -- that work was being undertaken. It's
16 a question of how far you go with it.

17 Q. Thank you. That can come down.

18 **SIR WYN WILLIAMS:** Before it does, Mr Beer, I just want
19 to -- I may be being wholly, unduly pedantic but there's
20 something itching away at me. Could you put it back up
21 again, please, that document. Just so I've understood
22 the timing of this, Mr Williams, the Horizon Issues
23 Trial had taken place but the judgment had not been
24 given, so within that time period; is that correct?

25 A. That's my understanding, sir.

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1 **SIR WYN WILLIAMS:** Right now the word "disclosure" may have
2 more than one meaning in the context I'm talking about
3 but in civil litigation you give disclosure by producing
4 a list of documents. You don't actually begin by simply
5 sending the other side a bundle of documents, do you?
6 You actually produce a list to notify them of what you
7 had?

8 **A.** That's correct, sir. That's my understanding.

9 **SIR WYN WILLIAMS:** Right. Now, in relation to these 14,000
10 KELs, which are described in this document as "new
11 KELs", had they ever been listed either in a formal list
12 or referred to in a letter to the claimants' lawyers to
13 notify them that they existed.

14 **A.** My understanding is that had had happened, sir, that had
15 happened fairly promptly upon been notified of these.

16 **SIR WYN WILLIAMS:** Right. So that I'm not misunderstanding
17 what's gone on, you are telling me that the existence of
18 these documents had not been hidden from the claimant
19 but nobody had looked at them to gauge their relevance;
20 is that it?

21 **A.** Almost it, sir. Looking at this, that is correct that
22 they are notified. It's my understanding, that --
23 I only received this document, which is -- it wasn't
24 referred to my Rule 9 Request, so I haven't looked
25 around this as I have some of the other issues, so this

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1 by Simon Baker to find out whether Horizon bugs had been
2 referred to in any previous court actions, in
3 anticipation of the publication of the Second Sight
4 Interim Report. This led me to put this question to
5 [Womble Bond Dickinson] and DAC Beachcroft, given that
6 to the best of my knowledge they were the [Post Office]
7 external lawyers most likely to have supported [the Post
8 Office] in any civil action.

9 "This activity made clear to me that Horizon bugs
10 had been discussed in two court cases, namely the 2007
11 civil case of *Post Office v Castleton* and the
12 prosecution of Seema Misra. In the context that I was
13 looking at them in mid-2013 however, there was no reason
14 for me to look into this further. That was because the
15 cases had concluded quite sometime earlier and there
16 were no indications from those I was supplying the
17 information to that anything further was required."

18 So, essentially, you're saying in mid-2013 you had
19 cause to enquire about past cases and that enquiry had
20 led you to two cases in which Horizon bugs had been
21 discussed: Lee Castleton and Seema Misra?

22 **A.** Correct.

23 **Q.** Can we look, please, at POL00117614 -- that's E68 -- and
24 turn to pages 3 and 4, please. If we just look at the
25 end of 4, we can see it's signed off "Tim", and if we go

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1 is my understanding with that caveat. It's my
2 understanding is --

3 **SIR WYN WILLIAMS:** Right, so that the Inquiry can satisfy
4 itself if it wants to about this, what you are, in
5 effect, telling me is that there will be a document in
6 existence which shows that the solicitors acting for the
7 claimants were notified of the existence of these 14,000
8 documents?

9 **A.** I sincerely hope so because that is my understanding,
10 sir, and then --

11 **SIR WYN WILLIAMS:** All right, that's fine. Thank you very
12 much. That's your understanding and we'll see in due
13 course where we go from there. Thank you.

14 **MR BEER:** Thank you, sir. I think that document can come
15 down now.

16 Can we turn, please, to your view of subpostmasters
17 and turn up paragraphs 44 and 45 of your witness
18 statement, please.

19 **A.** 44 and 45 was that?

20 **Q.** Yes. You say:

21 "I have been asked to comment on some 1 July 2013
22 emails concerning the 'Callendar Square bug' (sometimes
23 called the 'Falkirk' bug). These events happened over
24 10 years ago, so I do not now have a firm recollection
25 of how they unfolded. As far as I recall, I was asked

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1 back to page 3, we can see it's an email from Tim
2 McCormack to Paula Vennells with the subject "It had to
3 happen sooner or later", and it was sent on 14 October
4 2015.

5 I should say this is one of a number of emails
6 Mr McCormack sent directly to Ms Vennells in October
7 2015 regarding errors in Horizon. He says:

8 "This may be the last you hear from me directly.

9 "It is a last chance for you to accept what I have
10 been telling you these last few years is true.

11 "I now have clear and unquestionable evidence of
12 an intermittent bug in Horizon that can and does cause
13 thousands of pounds losses to subpostmasters.

14 "Tonight there is a branch in your network sitting
15 on a loss of 5 figures. The money does not exist. It
16 is as a result of several one sided transactions being
17 entered erroneously by the system not of the operator.

18 "I have documentation from [Post Office] employees
19 acknowledging the error and that it has happened before.

20 "I have the source documentation from the
21 subpostmaster concerned.

22 "I have evidence of a similar event happening two
23 years ago. It is also documented. I have a limited
24 channel of contacts in the Industry. Two similar events
25 (plus the admission by your employee that he is aware of

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1 other events) is a high percentage, and the error soon
 2 to be exposed will result in more coming to light.
 3 "Most importantly it is an error that would not be
 4 noticed by many subpostmasters and could well be the
 5 reason for many of the JFSA cases.
 6 "I have three options.
 7 "(a) this email is the first option -- appeal to
 8 your sense of decency and compassion to accept that many
 9 of the claimants in the JFSA [saga] are honest and
 10 decent citizens whose lives were destroyed by your
 11 organisation.
 12 "(b) go to the press and see what happens.
 13 "or
 14 "(c) await the inevitable judicial review where you
 15 will personally be exposed and perhaps leave yourself
 16 open to criminal charges.
 17 "We can stop this farce now. You can wake up and
 18 realise that the people you rely on to tell you the
 19 truth about what is happening don't have the ability to
 20 do so.
 21 "Option (b) happens on Friday. I have one former
 22 [subpostmaster] who is keen to proceed with a JR.
 23 Option (c) could happen sooner than you think.
 24 "You have two options:
 25 "(a) ignore this email and accept the consequences

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1 Nick Wallis, Sandip Patel QC, Professor Button).
 2 "I have sent those letters in the past and am happy
 3 to do so again. I'm also pretty sure I know about the
 4 JR he's referring to, and I have already sent a holding
 5 letter to that former [postmaster] acknowledging receipt
 6 of his complaint, so my name might be known to Tim
 7 already.
 8 "If you agree, I'll circulate something shortly.
 9 I'll want to send it hard copy ...
 10 "Generally, my view is that this guy is a bluffer,
 11 who keeps expecting us to March to his tune. I don't
 12 think we should do so, but instead respond with
 13 a straight bat."
 14 Mr Davies agrees at the top saying:
 15 "Thanks Rod -- wise advice with which I agree."
 16 By this time, October 2015, you acknowledge, we saw
 17 in your witness statement, that you were aware of
 18 suggestions that there were bugs in Horizon arising from
 19 your knowledge of the *Seema Misra* case and the *Lee*
 20 *Castleton* case, yes?
 21 A. Correct.
 22 Q. The Second Sight Report, the interim report and its
 23 second report, had been published by now, hadn't they?
 24 A. Yes.
 25 Q. Why did you think Mr McCormack was a bluffer?

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1 "(b) travel with me to the branch in question. See
 2 for yourself the evidence. Talk to the subpostmaster
 3 concerned and reach your own conclusion. I want nothing
 4 out of this and will meet my own costs."
 5 If we look at the foot of page 2, one of the
 6 Executive Assistants to Paula Vennells sends the email
 7 on to Angela van den Bogerd and others:
 8 "Please see email from Tim. Can you advise what
 9 action we need to take?"
 10 Further up the page, Angela van den Bogerd sends it
 11 to Mr Davies and to you:
 12 "Mark, Rod,
 13 "My view is that we should ask Tim to share the
 14 information with us so that we can make an informed
 15 decision on how to proceed."
 16 So actually taking up, essentially, part of option
 17 (a), agreed?
 18 A. Yes.
 19 Q. "I would suggest this is probably best coming from Paula
 20 in the first instance."
 21 Then over the page, your reply:
 22 "Thanks Angela. I agree we should ask for the
 23 information, but recommend that we write to him in the
 24 same terms that we have every other person who has said
 25 they have evidence of flaws (Kay Linnell, Second Sight,

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1 A. Sorry, I think the bluffing is in relation to the "you
 2 have options or else", the sort of threat. He'd been
 3 a serial correspondent. I don't know where this sits in
 4 the course of that time, but my understanding is --
 5 sorry, my recollection, and it is a recollection, again,
 6 this is one of the more recently disclosed -- is,
 7 certainly, we offered -- and I think it may have been
 8 Angela van den Bogerd met with him to try to understand
 9 the issue in the branch and so, you know, we had already
 10 started to take steps to understand.
 11 But, if he had information which he was clearly
 12 saying he had, he should be able to share that with us
 13 so we could manage it; we could process it, understand
 14 it and respond as appropriate. He wasn't very specific
 15 with what the issue was or where it was, so there were
 16 very limited lines of inquiry that we had internally,
 17 without something more from him.
 18 Q. Why did you recommend that the Post Office should
 19 respond with a straight bat, ie avoid answering the
 20 direct questions or giving them the information they
 21 want and just bat it back to them?
 22 A. No, that's not what I'm saying there at all. I'm saying
 23 a straight bat is, whatever I think about the
 24 correspondent, we should respond to as his inbound in
 25 enquiry seriously and appropriately. That's what

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1 I meant by a "straight bat".

2 **Q.** So you weren't referring to responding with a straight

3 bat there as meaning when a batsman holds their bat

4 vertically and just knocks the ball back to the person

5 who sent it to them?

6 **A.** I don't know, it's the second time my -- a straight bat,

7 to me, means appropriately.

8 **Q.** Honestly, appropriately?

9 **A.** Yes.

10 **Q.** That's the sense in which you are using the expression,

11 rather than, as I've used it, ie bat it straight back to

12 them?

13 **A.** Yeah, no, no, sorry, straight bat is appropriately.

14 **Q.** What investigation was, in fact, carried out?

15 **A.** I recall writing a letter, as I think I indicated, to

16 Mr McCormack. I also recognised the letters that I'd

17 put in brackets where we'd invited other people to send.

18 I think his was slightly different. I seem to recall it

19 being a little bit different where I tried to address --

20 in his email he said there were concerns, you know --

21 what did he say? People not giving the right -- maybe

22 not here. Sorry, it's not in this one.

23 No, sorry, it's not in this. I can't see it anyway.

24 I've lost my train of thought, sorry. I wrote a letter

25 to him inviting him to share it and I think I added some

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

2 the page, thank you, you say:

3 "I'm not inclined to reply -- and certainly we don't

4 need to ... given the tone of this and his other

5 communications, and we've already told him we're not

6 going to comment."

7 Then further up the page, you provide a draft for

8 Ms Vennells' Executive Assistant and say:

9 "Avene,

10 "On reflection I'd like to go back to Mr McCormack

11 with a short response, for no other reason than to

12 ensure he can't allege that we don't respond [to issues]

13 ...

14 "Mr McCormack,

15 "Post Office has asked me to respond to your email.

16 Post Office would be happy to consider any information

17 you may care to disclose ... However, and in line with

18 my previous reply to you dated 4 July ... Post Office

19 will not comment on the other matter you have raised."

20 Why were you writing these responses back to

21 Mr McCormack or drafting responses back to Mr McCormack

22 which all simply shut down what he was saying and didn't

23 say we will investigate the concerns that he raised?

24 **A.** Have we got anywhere in the bundle my -- this has

25 referred to two bits of correspondence from me, one is

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1 extra comfort around that the material would -- to try

2 to give him confidence that the material would be

3 treated properly. I --

4 **Q.** Can we move on, then, in your dealings with Mr McCormack

5 POL00119584 that's E69. If we start by looking at

6 page 4 and 5. We're now in July of the following year

7 and Mr McCormack emails the Post Office, copying Paula

8 Vennells and Tim Parker in, in relation to

9 an investigation into the prosecution of Seema Misra.

10 Can you just scan that the first part of that

11 correspondence? Then, if we go to page 5, the third

12 paragraph, Mr McCormack says he finds it:

13 "... utterly appalling that Post Office seek to

14 prolong the suffering of a woman [that's Seema Misra]

15 who very clearly did not commit the crime she was

16 accused and convicted of. You have the opportunity to

17 contact the CCRC straight away on this matter and ensure

18 Ms Misra suffers no longer than she has to. I urge you

19 to do so today. At the moment I am prepared to consider

20 incompetence as the rationale behind these contemptible

21 failings of [the Post Office] to understand that Horizon

22 is capable of producing intermittent errors that result

23 in huge paper losses at subpostmaster branches. Any

24 subsequent delay will make me consider the far more

25 serious matter of conspiracy."

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1 4 July 2016 and the other is 19 November, I assume,

2 2015. Do we have either of those?

3 **Q.** I can certainly try and find those over lunch, are you

4 saying that, in those, we will find --

5 **A.** I'm not sure. I'd like to see them because they are

6 referred to because I -- I think, consistent with the

7 previous email, we said we should ask him for what he's

8 got and, if we don't receive stuff, there's a limit to

9 how much correspondence you can engage with the person

10 who won't give you lines of inquiry or sufficient

11 information to take it forward. And I think in those

12 circumstances -- and I think this was happening at the

13 time -- it's appropriate to try to draw the

14 correspondence to an end or to a point where it can be

15 taken forward meaningfully.

16 **Q.** Did you think he was a mischief maker?

17 **A.** No, I -- I think he was a genuinely concerned

18 individual.

19 **Q.** You didn't think he was making mischief?

20 **A.** I don't quite know what you mean by that. I think he

21 was concerned. I mean, making mischief to me sounds

22 like this is a bit of a giggle, I don't think he --

23 nothing I saw on any of his correspondence made me think

24 he thought that, quite the opposite. I think he was

25 genuinely motivated to raise issues with us. The

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1 challenge we had is we weren't quite sure what the issue
 2 was.
 3 **Q.** You couldn't tell from Mr McCormack, he wasn't
 4 explaining himself clearly to you?
 5 **A.** He just wasn't giving us any information to take things
 6 forward. His references to an issue and a branch is not
 7 something --
 8 **Q.** He was inviting the Chief Executive to come to the
 9 branch and not rely on people like you who were
 10 misinforming her?
 11 **A.** That's true, that's -- a lot of people ask lots of Chief
 12 Executives --
 13 **Q.** Why not take that up with some other person and say,
 14 "Okay, we'll come to the branch and we'll look at
 15 an error unfolding before our eyes, as you, Mr McCormack
 16 say will happen"?
 17 **A.** As I say, my recollection is that that had taken place
 18 with Angela van den Bogerd but I'm not 100 per cent
 19 confident of that recollection. That's what my
 20 understanding is -- sorry, that's what my belief is.
 21 **Q.** Last thing on this topic, can we look at POL00041382.
 22 That's E28.
 23 **A.** I'm sorry if I'm not as clear as this, I did any see
 24 these on Friday evening, so I'm not as familiar with the
 25 documents around here as I am with others in my
 93

1 for any discrepancies in branch. I really want to try
 2 to help this postmaster but clearly we cannot say that
 3 we will not address what they have confirmed to us
 4 ie that they have falsified their account.
 5 "My preference would be to explain to this
 6 postmaster what the errors to which he refers are and
 7 that if these were affecting his branch we would be able
 8 to identify that.
 9 "On the false accounting point could we say
 10 something along the lines of ..."
 11 Then some text is inserted.
 12 Then if we go to page 3, please, and if we look at
 13 your email -- that's it. 16 November, you reply.
 14 "Hi Angela -- I do not think that this is a genuine
 15 request. It has all the hallmarks of Tim McCormack
 16 mischief ... these [Freedom of Information] requests
 17 were recently cited in a blog which thanked Mr McCormack
 18 'for his work in relation to the Horizon system'.
 19 Did you consider that Mr McCormack was making
 20 mischief?
 21 **A.** Well, I think at this point, sort of anonymised requests
 22 from "AN Obody" might drift a little bit closer but, no,
 23 again, I think he was motivated -- to be clear, I don't
 24 know that this was from Mr McCormack. I'm saying it
 25 struck me it had the hallmarks I think from -- and
 95

1 statement.
 2 **Q.** E28.
 3 **A.** Thank you.
 4 **Q.** Can we start, please, on page 7. If we scroll down,
 5 please, thank you, there's an anonymous Freedom of
 6 Information request. Can you see that on the middle of
 7 page 7? If we scroll up, please, Angela van den Bogerd
 8 sends that on to a range of people and says:
 9 "In the light of the Court Action I think Legal
 10 should draft the response on this, we have provided the
 11 'anonymous' person options to resolve the alleged issue
 12 ... and cannot do much else in this public arena and
 13 advised what they should do if they want an internal
 14 review.
 15 "I think the response should be based on the fact
 16 that this is not a request for recorded information and
 17 whatever context are felt to be required -- therefore
 18 I have attached the basic response to this for
 19 amendment."
 20 Then if we go forward to page 5, please, in the
 21 middle of the page -- so if we can scroll. That's it.
 22 Ms van den Bogerd says to you:
 23 "This postmaster clearly thinks the answer to their
 24 problem is in this list of errors and in all likelihood
 25 is therefore not looking/or does not know how to look
 94

1 I think reading it -- from reading back, trying to --
 2 the style was similar to the way he wrote. But I don't
 3 know that it was him.
 4 **Q.** Did you think generally he was making mischief?
 5 **A.** No, I think -- I thought I'd answered that. No, he was
 6 genuinely motivated to pursue, I think in particular,
 7 Seema Misra's case. I think that's clear from the
 8 feeling you can see in his emails.
 9 **Q.** Thank you. That can come down.
 10 Looking back, then, in your dealings with the media,
 11 with subpostmasters, whether directly or indirectly, who
 12 were making complaints about Horizon, do you say you
 13 acted appropriately at all times?
 14 **A.** I certainly tried to. There's a possibility I didn't.
 15 All times is quite a long time and I think we've already
 16 seen one email that, on the banter side of things,
 17 was -- you know, maybe would have -- would not have sent
 18 or expressed differently.
 19 **Q.** Thank you.
 20 **A.** I'd like to think I always that respect for them because
 21 they were dogged and determined.
 22 **Q.** Did you ever think, as well as being dogged and
 23 determined, they might be right?
 24 **A.** Yes.
 25 **Q.** Did you ever express that openly, "Hold on, we should
 96

1 all just pause; they might actually have a point here"?

2 **A.** Well, I think we -- by our actions, we were doing that,

3 the scheme sought to do that by investigating the -- the

4 Mediation Scheme sought to do that by investigating the

5 individual cases.

6 **Q.** That was a genuine attempt to get to the truth, was it,

7 the Mediation Scheme?

8 **A.** As far as I was concerned, yes.

9 **Q.** The setting up of the Second Sight interim investigation

10 before it? That was a genuine attempt to get to the

11 truth, was it?

12 **A.** It was -- as far as I was aware, yes. I came after that

13 had started, so, you know, the genesis for it, the

14 origins with it, I'm less familiar with but everything

15 I saw suggested that's exactly what it was.

16 **Q.** Can we look, then, at your engagement with Second Sight

17 and the complaints that were made before it published

18 its Interim Report in July 2013. So we're looking at

19 the period here August 2022 to July 2013. Can we start,

20 please, with your witness statement at page 15,

21 paragraph 32.

22 **A.** Sorry, page 50, paragraph 32? Paragraph 32. Thank you.

23 Sorry, 15. I beg your pardon.

24 **Q.** I should just read for context or ask you to look at

25 context -- just cast your eye over paragraphs 29, 30 and

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1 **Q.** -- about Horizon immunity proposals and you outline

2 a proposal from the JFSA in the first three bullet

3 points. If we scroll down, you say, "Our draft

4 response", and then you set out three bullet points.

5 So you're essentially noting the Post Office's

6 options are: do nothing to this proposed immunity,

7 ie a non-retribution against postmasters for engaging in

8 the scheme; secondly, propose a no-blame inquiry to be

9 carried out by Second Sight, which would determine

10 whether Horizon was fit for purpose but would not rule

11 on individual cases; or mediate with the JFSA? In

12 relation to the latter option, you say:

13 "This may just at further time and cost with no

14 guarantee of a successful outcome."

15 Yes?

16 **A.** Yes.

17 **Q.** If we scroll down. Thank you. You say:

18 "If we go down the Inquiry route:

19 "It would determine whether Horizon is 'fit for

20 purpose', by reference to comparable systems;

21 "It would not 'rule' on individual cases because of

22 the very wider range of concern which could be submitted

23 (eg inadequate training, inadequate support, user error,

24 third party intervention, Horizon itself).

25 "Cases will be chosen by Second Sight/JFSA/

99

1 31.

2 With that background, you say in 32 --

3 **A.** Sorry, can I just finish? Thanks. Thank you.

4 **Q.** With that background, you say in paragraph 32:

5 "While these tasks gave me some awareness of the

6 controversy around Horizon, I did not get into the

7 detail of Second Sight's work or the underlying

8 complaints, and I was not involved in considering the

9 merits of any of the concerns being examined by Second

10 Sight."

11 I just want to examine the extent of your

12 involvement and the extent of your role at this time.

13 Can we look, please, at POL00143827; that's tab E80.

14 **A.** E80 or E18?

15 **Q.** E80.

16 **A.** Thank you. *(Pause)*

17 **Q.** Are you there?

18 **A.** I'm sorry?

19 **Q.** Are you there?

20 **A.** Yes, I am, sorry. Sorry, I thought I'd said. I beg

21 your pardon.

22 **Q.** It's 1 November 2012.

23 **A.** Yes, I have that.

24 **Q.** An email from you to Mr Flemington --

25 **A.** Mm-hm.

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1 [subpostmasters], not [the Post Office] -- this helps

2 neutralise any suggestion that [the Post Office]

3 'cherry-picked' cases or that the process is

4 a 'whitewash'. [The Post Office] can still advance its

5 case on the investigation concerns."

6 Just looking at that first page, it seems, at this

7 time, November 2012, so within three or four months of

8 you joining the company, you were engaged in considering

9 how subpostmasters' concerns would be addressed by or

10 interact with an investigation by Second Sight, weren't

11 you?

12 **A.** Yes, I was, I actually -- looking at my statement -- I'm

13 sorry -- what I think I'm saying in paragraph 32 is

14 I wasn't looking at the detail of the individual

15 complaints, so I'm sorry if that's given the wrong

16 impression.

17 **Q.** Why were you conscious of suggestions that the Post

18 Office would cherry-pick cases or whitewash cases

19 considered by Second Sight?

20 **A.** Well, to get a conclusion, you need something -- so

21 it -- well, my understanding was they were trying to --

22 that Second Sight had been instructed to get to the

23 bottom to see whether issues with Horizon could have

24 been the source of unexplained shortfalls in branch

25 accounts. If Post Office leads with its own cases and

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1 only its own cases, it's marking its own homework, it's
 2 open to challenge, being, you know, biased, selectively
 3 in favour of their own and, hence, the exercise was
 4 probably unlikely to satisfy the counterparty.
 5 **Q.** So it would be fair to say, looking at your involvement
 6 at this stage, you're addressing process or structural
 7 issues, rather than individual case?
 8 **A.** I think so, yes.
 9 **Q.** Yes?
 10 **A.** Yes.
 11 **Q.** We can take that down.
 12 Can we look, please, to POL00186090, that's tab
 13 E100.
 14 **A.** I have that, thank you.
 15 **Q.** We're now in spring 2013, and can you see that, at the
 16 foot of the page, if we scroll down, Mr Swepson, who is
 17 a Programme Planner in the IT Separation Programme
 18 Office, if we scroll down a little further, sends you
 19 some spot reviews. Just summarise for us what a Spot
 20 Review was?
 21 **A.** My understanding was a Spot Review was Second Sight's
 22 work had identified specific instances of, I guess,
 23 branch issues, at the widest level, that had been put to
 24 them by the postmasters that they wanted to deep dive.
 25 Those issues were sort of crystallised into an issue

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1 **A.** Yes. I wonder if it was either "briefing" or "meeting"
 2 I'm not sure. It's a typo for sure.
 3 **Q.** You told us in your witness statement that you were not
 4 interested in considering any of the merits of the cases
 5 being examined by Second Sight and this seems to have
 6 you going to a meeting to discuss a draft response?
 7 **A.** I don't believe I attended that meeting. I don't recall
 8 doing it.
 9 **Q.** Why were you involved or why were you to be involved in
 10 the formulation of the Post Office's responses to spot
 11 reviews?
 12 **A.** So part of my role, I was quite often the point man, the
 13 conduit, between external advisors to a project team.
 14 In this case, Bond Dickinson were supporting Post
 15 Office's review of the spot reviews and I think the
 16 programme lead for the Second Sight engagement --
 17 I think we saw a footnote somewhere in my statement --
 18 the project lead was a guy called Simon Baker. I think
 19 he had asked for two things. He'd thought -- one was to
 20 strengthen the language, the form, the content of the
 21 spot reviews to better advance Post Office's response to
 22 the issues.
 23 **Q.** To put it as robustly as was possible; is that right?
 24 **A.** Quite possibly. I can't remember if that's the words
 25 used but it was of that tenor, yes. And then he also

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1 with each issue being named a Spot Review. So I think
 2 two are referenced in this.
 3 So spot review was an attempt -- forgive me, I'm
 4 fluffing my lines. Spot review was an attempt to
 5 analyse in detail a specific allegation raised to Second
 6 Sight through this interim early phase, the first phase
 7 of their work.
 8 **Q.** Thank you. If we scroll up, that having been sent to
 9 you by Mr Swepson, if we just look at the email, you
 10 send it on to Gavin Matthews and Andrew Parsons, yes?
 11 **A.** Yes.
 12 **Q.** You say:
 13 "I confirm our meeting this Wednesday [is at] Old
 14 Street ...
 15 "... I attach the 'Spot Reviews' we have received
 16 and our current draft responses.
 17 "We will discuss the responses at the meeting, with
 18 a view to producing a standalone document which sets out
 19 our definitive position on the issue raised in the 'Spot
 20 Review' ... the final response [may] enter the public
 21 domain, so we need to ensure that it is robust,
 22 defensible and properly protects/advances Post Office
 23 Limited's case.
 24 "I look forward to [I suspect that should mean
 25 'briefing'] you on Wednesday."

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1 asked, I think, for support from some lawyers on that
 2 because -- and then, thirdly, I think he also asked if
 3 I could arrange a meeting at their offices because
 4 finding a meeting room was always quite difficult.
 5 I have to say, I don't particularly recall this but
 6 I managed to refresh myself from my documents.
 7 I think, ultimately, the meeting was held at 148 Old
 8 Street, which was Post Office's office, which is why
 9 I think I was able to meet Gavin and Andy when they came
 10 but, as I say, I don't actually recall attending the
 11 meeting.
 12 **Q.** Was a defensive approach taken to Post Office's response
 13 to the spot reviews?
 14 **A.** I suppose you could say defensive; you could also say it
 15 was an offensive one, it was a proactive one, they were
 16 trying to positively advance their response. You could
 17 say it either way. Both are, I think, fair
 18 interpretation -- it was certainly trying to put their
 19 position, our position, as firmly as possible.
 20 **Q.** To what extent did that undermine the purpose of the
 21 Second Sight investigations?
 22 **A.** I don't think it did because Second Sight would review
 23 it and consider it and comment as appropriate but --
 24 **Q.** It wasn't meant to be a litigious or adversarial
 25 process, was it?

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1 A. No, but also I don't think articulating things in a, you
 2 know, clear and representative manner is necessarily
 3 adversarial. You might not like what's been written but
 4 it doesn't mean it's not there for consideration.

5 Q. Were instructions given to you to take an open and
 6 transparent approach with Second Sight or to take
 7 a robust one which properly advanced a case on behalf on
 8 the Post Office?

9 A. I don't actually recall any instruction either way on
 10 that. It was provide information to them that they
 11 asked for -- at this stage, certainly was that.

12 Q. Was there no overarching strategy in the Post Office's
 13 response to the initial Second Sight investigation?

14 A. I'm not aware of one or I don't recall one today,
 15 certainly I don't recall being aware of one at the time
 16 either.

17 Q. You don't remember instructions to the effect that,
 18 "This process has been set up as an alternative to
 19 litigation, we should not adopt an adversarial approach
 20 in it, a litigious approach, one in which we are
 21 lawyered up. We should try and be as open as possible
 22 to let the truth filter out"?

23 A. I'm sorry, there's a lot in there. What's the question,
 24 sorry?

25 Q. You don't remember any instructions, for the purposes of
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1 was a form in which an application to the Mediation
 2 Scheme would articulate their concerns, what they wanted
 3 investigated and why, I believe. Sort of get the
 4 inbound complaint, as it were.

5 Q. Anyway, you attached amendments to a proposed reply to
 6 the case questionnaire and, in the third paragraph, you
 7 say:

8 "Taking a step back, [Mr] Castleton seems to be
 9 relitigating his High Court case (I'm going to look at
 10 the judgment over my sandwich -- but a [very] quick
 11 glance shows that even the £100.20 scratchcard issue was
 12 considered). I appreciate that we can't just behind
 13 that (he'll say he didn't have the resources to take on
 14 the Big Boy), but I do think we can set out a stall
 15 where we portray him as someone who wants £5.2 million
 16 after providing inadequate services for all of
 17 9 months."

18 So this was you amending/tweaking the Post Office's
 19 response in the initial Second Sight review process?

20 A. Yes.

21 Q. You told us in your witness statement that you weren't
 22 involved in considering the merits of individual cases?

23 A. I think that's because -- where I said that first bit
 24 was in relation to Second Sight's work up to the interim
 25 report, that this is produced through the Mediation
 107

1 the initial Second Sight review, to you or to lawyers
 2 involved in the Second Sight initial review, which said,
 3 "We should adopt an open and transparent approach,
 4 not" -- sorry, yes?

5 A. I'm sorry, I don't recall an instruction like that. On
 6 the litigation point, I think I became aware that these
 7 had recently been -- sorry, similar cases had recently
 8 been the subject of litigation and there was a concern
 9 that was always in the background. So I wouldn't want
 10 to say that there wasn't a concern of litigation in
 11 there, which is why -- and, in here, you can see I've
 12 said "Look, they need to be defensible and properly
 13 protect Post Office's position".

14 I don't know that that's inconsistent with putting
 15 forwards information in an open or transparent manner
 16 and I think it's just how it's presented.

17 Q. Can we move on. POL00074005. That's tab E43.

18 A. I have it, thank you.

19 Q. We're now in November 2013 and we can see from this
 20 page, you writing to Mr Parsons, saying you attach your
 21 mark-up of the Post Office's response to the Castleton
 22 CQ. Can you remind us of what a CQ was?

23 A. I think that's a case questionnaire.

24 Q. Can you remember the function or purpose of a CQ?

25 A. I hope so. It was the applicant to the schemes -- it
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1 Scheme, where I did look at the detail of some cases but
 2 certainly not all of them.

3 Q. So after July '13 you took a different role; is that
 4 right?

5 A. After July '13 when the Mediation Scheme started I did
 6 start looking at some cases in varying depths of detail.

7 Q. Why was your reaction to Mr Castleton's CQ to set out
 8 a stall rather than investigate the issues that were
 9 raised?

10 A. In this case, and it literally was, I think, this sole
 11 case, I was aware that Mr Castleton's complaints about
 12 branch accounting had been the subject of High Court
 13 proceedings and, indeed, trial and judgment, which --
 14 the judgment of which underpinned a lot of the Post
 15 Office's operating practices, with respect to -- as far
 16 as I can tell, with respect to postmasters up until the
 17 Group Litigation.

18 Q. That's interesting. Tell us to what extent the *Lee*
 19 *Castleton* judgment underpinned a lot of the Post
 20 Office's operating practices until the next judgment
 21 12 years later?

22 A. It was a High Court judgment that confirmed an agent's
 23 liability to the principal for accounting and it also
 24 made findings that Horizon had been working, quite
 25 specifically, though, in that case, in that branch.
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1 Q. How did that second point underpin the Post Office's
2 approach to its operating practices for the following
3 12 years?
4 A. Well, I think it was a strand, but certainly not the
5 only one, that gave them confidence in the reliability
6 of the system.
7 Q. Was it reviewed or referred to a lot within the Legal
8 Team, then?
9 A. Yes, yes, it would have been. It was the -- as far as
10 I was aware, at that time, and I think, certainly from
11 my time, it was the only High Court judgment on this
12 issue or, certainly, the most -- sorry, I'll rephrase
13 that, it was the most recent one. I definitely know
14 that.
15 Q. Was its importance elevated or emphasised, then, within
16 Post Office's Legal team?
17 A. Certainly to me it was, yes.
18 Q. Who did that to you? Who said that to you or are you
19 saying that you read the judgment and formed that view
20 yourself?
21 A. I certainly think it's the latter but -- I would have
22 said it was the latter, yes, I would have said it's
23 something I formed.
24 Q. So what did you take from it? I think you said two
25 things there: firstly, it confirming the agent point,

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1 Q. After you became involved more extensively in the Second
2 Sight work, did you continue in your role as point man
3 for media relations within the Legal team?
4 A. Yes, I would think so.
5 Q. Can we look at POL00145120, please. That's E82. Can we
6 start by looking on the foot of page 1 and on to page 2,
7 please. We see an email from you of 3 July 2013, so
8 this is four or five days before the publication of the
9 Second Sight Interim Report. You are emailing Susan
10 Barty, who is a partner, I think, at Cameron McKenna,
11 yes?
12 A. Correct.
13 Q. You say, in relation to the Second Sight Interim Report:
14 "We expect to see Second Sight's Interim Report late
15 Thursday/early Friday. I will forward it to you as soon
16 as it is to hand so you can review it for factual
17 accuracy and (as requested by our Chairman) any possible
18 defamation issues. We will want as quick a turnaround
19 as possible."
20 Why did the Post Office engage Cameron McKenna to
21 review the Second Sight Report for defamation issues?
22 A. I think there was a concern, I was working on sort of
23 direction from --
24 Q. From the Chairman?
25 A. Well, actually I was getting it sort of secondhand,

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1 yes?
2 A. Yes. I'm trying to think what else I'd take from it.
3 I haven't read the judgment for a while but -- sorry,
4 that was one of -- one of it was an agent's liability to
5 principal and the second point was that when they looked
6 at the complaints, and that's -- this is what I referred
7 to here, the specific complaints that had been raised
8 had been forensically interrogated in the High Court
9 proceedings to the point that a judge was able to say
10 Horizon was working or the judge felt able to say that.
11 Q. You say here that you cannot hide behind the judgment.
12 A. Can you remind me where I say that, sorry?
13 Q. Third paragraph:
14 "Taking a step back, Castleton seems to be
15 relitigating his High Court case ... I appreciate we
16 can't just hide behind that ..."
17 A. No, I'm saying you can't just say he litigated and go
18 but I thought it was fair to make comments that some of
19 the issues he had raised had been raised and adjudicated
20 on before. I think what I'm saying there -- again, it's
21 a little while -- I think what I'm saying there is you
22 can't just be dismissive, you had your day in court, go,
23 but also, I did think -- well, I think I think -- it's
24 appropriate to recognise the judgment in the proceedings
25 that had taken place.

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1 I think, from the General Counsel.
2 Q. But you understood it came from the Chairman?
3 A. I certainly understood it came from the Chairman that
4 there was a concern that the -- or they wanted to know
5 that the reporting would be accurate -- sorry, the
6 report would be accurate.
7 Q. That's a bit different because you say:
8 "... you can review it for factual accuracy and ...
9 any possible defamation issues."
10 A. Yes.
11 Q. Was the Post Office considering suing Second Sight for
12 defamation?
13 A. It depends -- I wasn't aware of that instruction.
14 Q. Right from the top?
15 A. I don't know exactly what "from the top" was. What
16 I recall was being asked to get a media lawyer to look
17 at it -- and I think, you know, defamation was used, so
18 clearly was used, but I wouldn't go as far as to say
19 because they were thinking of suing. I think that's --
20 we're being asked to look to see what grounds there may
21 or may not be for something like that.
22 Q. Why would the Post Office be looking at what grounds
23 there would be to bring a defamation claim against
24 Second Sight?
25 A. So I think it's reputation management first and foremost

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1 and are untruths going to be said that may damage Post
 2 Office? I'm pretty sure -- because I did look around
 3 this a little bit, I'm pretty sure we gave some advice
 4 pretty quickly explaining the challenges that
 5 a corporate entity has in pursuing defamation actions
 6 and, in particular, the need to prove demonstrable loss.
 7 But I think that the shorthand was are untruths going to
 8 be said which will cause us harm?

9 **Q.** Again, was that part of the open and transparent
 10 approach that the Post Office was taking towards Second
 11 Sight's work?

12 **A.** I don't think so no.

13 **MR BEER:** Sir, it's 1.00, nearly. Might we break now until
 14 2.00 pm please.

15 **SIR WYN WILLIAMS:** Yes, of course.

16 **MR BEER:** We're about to change topic.

17 **SIR WYN WILLIAMS:** Fine, that's fine.

18 **MR BEER:** Thank you.

19 (12.58 pm)

20 (The Short Adjournment)

21 (2.00 pm)

22 **MR BEER:** Good afternoon, sir, can you see and hear us?

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

24 **MR BEER:** Good afternoon Mr Williams, can we go back to
 25 an issue that we addressed this morning which was your

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1 Mr Williams, of material to Second Sight. Can we turn
 2 up page 14 of your witness statement, paragraph 30,
 3 please. Can you see in paragraph 30, you say:
 4 "Second Sight had been appointed before [you] joined
 5 [the Post Office] and [you] did not have any direct
 6 knowledge of the process or how the scope of its
 7 original retainer was determined."

8 Then three or four lines on you say:

9 "... I felt I needed to raise the risks around
 10 disclosing legally privileged documents to a third party
 11 without putting a clear framework in place to govern
 12 their use."

13 **A.** Yes.

14 **Q.** Then, if we go to paragraph 34 on page 16, please, you
 15 say you remember reviewing a number of draft Spot
 16 Reviews to see what they looked like, sharing thoughts
 17 with Womble Bond Dickinson. Then a couple of lines on:

18 "I recall that [the Post Office] sought to organise
 19 the preparation and drafting of the Spot Reviews in
 20 a way that would maximise the potential for [the Post
 21 Office] to claim legal professional privilege over them
 22 and any exchanges with Fujitsu relating to them as they
 23 were being developed."

24 Was that essentially a strategy that would apply in
 25 ordinary litigation?

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1 advice on communications with Tim McCormack, and you
 2 asked whether it would be possible to see a letter that
 3 you wrote. I think I've tracked that down. It's
 4 POL00118066.

5 Can you see this is a final version of a letter that
 6 was sent to Mr McCormack. At the foot of the page we'll
 7 see that it was sent by you and, at the top of the page,
 8 we'll see it's 19 November 2015. If you quickly scan
 9 the paragraphs to see if it is the letter to which you
 10 were referring.

11 **A.** I think it is.

12 **Q.** It is the letter. So was the point you were making that
 13 in this letter, by this letter, you had asked
 14 Mr McCormack to provide you with evidence?

15 **A.** Yes.

16 **Q.** Thank you very much.

17 Sir, in relation to some questions that you asked
 18 Mr Williams earlier about the post-trial pre-judgment
 19 exchange of correspondence over the 14,000 new KELs,
 20 there is some material which touches upon that. I'll
 21 address that, if I may, tomorrow morning with
 22 Mr Williams, so that we've got the complete set of
 23 correspondence on the system.

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

25 **MR BEER:** Can we turn to the provision, therefore,
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1 **A.** I would think so. When it's contemplated, you're
 2 usually keen to understand what's in issue before, so
 3 that you can take informed advice on it before
 4 proceeding to take your actions.

5 **Q.** Were you comfortable in cross-applying that approach to
 6 the Second Sight initial investigation?

7 **A.** I'm -- I think there are two bits there. Part of it was
 8 also so that the company could obtain advice on what was
 9 being revealed through the investigations. So I think
 10 the privilege in issue wasn't just in connection with,
 11 say, contemplated litigation but also so that advice on
 12 what it may mean for Post Office's legal position could
 13 be obtained as material was identified or created.

14 **Q.** Was any consideration given to the fact that you were
 15 not in litigation at this time but you were in a sort of
 16 quasi-mediation process?

17 **A.** My recollection is that the prospect of litigation was
 18 sort of always sitting there. Looking at it today, I'm
 19 not sure whether it would be properly contemplated for
 20 the purposes of litigation privilege but, at the time,
 21 it felt like a claim was always around the corner.

22 **Q.** Was any consideration given to the fact that your
 23 company was Government owned and, in many of the
 24 functions it discharges, discharges them -- or they are
 25 functions of a public nature?

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1 A. That was a consideration that came up a lot, was POL
2 a public body?
3 Q. You called it a public body there. Was that a factor
4 that was brought consciously into account in the course
5 of either the first part of Second Sight's activities or
6 when you entered the Mediation Scheme proper?
7 A. I don't recall it. I'm thinking it's more -- sorry, let
8 me -- sorry, could you have another go at, sorry, the
9 question. I think I know where you're at but I'd like
10 to make sure I understand the question.
11 Q. Was any consideration given to the fact that your
12 company was Government owned and many of its functions
13 were those of a public nature -- you called it public
14 body -- in either the initial activities of Second Sight
15 or when you ended the mediation proper?
16 A. Yes, it was. I'm sorry, and thank you for --
17 I appreciate that. I think they're a little bit --
18 I remember it being an issue, largely because of
19 questions around whether -- from where, in so far as my
20 role was concerned, whether, you know, Post Office's
21 actions may be amenable to judicial review, was
22 certainly part of that consideration. I think there was
23 also consideration that Post Office is amenable --
24 sorry, is open to Freedom of Information Act requests
25 as, effectively, a designated body for that Act.

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1 Team, so far as you're aware?
2 A. I don't recall that, no.
3 Q. Was it ever discussed between you as the lawyers and
4 executives as the client?
5 A. I don't recall that.
6 Q. "Hold on, we're a public body here. Some might say that
7 we've got different duties and standards to adhere to
8 and apply. We're not just another big corporation who's
9 free to litigate in any manner we choose"?
10 A. Not in those terms but there was the sense that, you
11 know, Post Office -- I do think there was a sense the
12 Post Office -- because we were in communities length and
13 breadth of the nation, that it was important to be doing
14 the right thing. I think that's probably the way to
15 describe it. I think there was a concern for that to be
16 done. I don't recall it in the sort of construct of
17 a public body that you've been describing.
18 Q. I think it's fair to say, in the 130-odd pages of your
19 witness statement, we don't see the considerations that
20 I've just raised reflected; that's right, isn't it?
21 A. That's correct, yes.
22 Q. In any of the documents, I don't think we see those
23 considerations reflected, do we, certainly the ones
24 you've seen?
25 A. No, we don't. I don't think so, no.

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1 Q. Both of those answers, Mr Williams, are essentially
2 technical legal answers as to the status of the Post
3 Office and the application of either public law or the
4 Freedom of Information Act to it.
5 My question was: in the context of either the
6 initial work by Second Sight or in the mediation proper,
7 was consideration given to your status as a public body,
8 as you've described it, in terms of how should we
9 approach these things?
10 A. I don't think so. I think the -- not terribly far
11 removed from that maybe was, you know, the concern that
12 Post Office is in every community throughout the length
13 and breadth of the country. That was -- Post Office's
14 status in those communities was I think part of it. But
15 that -- and we were also, you know, aware of, you know,
16 very considerable stakeholder interests from Members of
17 Parliament who were considered -- I think they were
18 quite offered referred to as a stakeholder group, but
19 I don't recall anything other than that, but that may be
20 because it just wasn't in my bailiwick.
21 Q. It's sometimes said that public authorities, public
22 bodies or organisations who discharge functions of
23 a public nature should operate by different standards in
24 litigation or quasi-litigation, like a mediation. Was
25 that something that was ever discussed within the Legal

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1 Q. Was that a concept with which you were familiar at the
2 time: public authorities may have to behave differently,
3 when they come into contact with the law, than private
4 companies?
5 A. No, that's not a concept I'm familiar with, I'm sorry.
6 Q. Would it be fair to say that, in your legal advice and
7 any discussions you had with clients, you regarded the
8 Post Office as any other litigant. It could be a big
9 City corporation?
10 A. No, no. I -- I don't think we could act in the way Big
11 Oil would act.
12 Q. I'm sorry, I missed that word: big?
13 A. Big Oil, for instance, like a large petrochemical
14 company. No, I think there was --
15 Q. Why not?
16 A. Because there was a sense that, I think, Post Office was
17 concerned about its images, it's in communities, it's
18 part of the fabric of society and, as a consequence, it
19 couldn't be a "plough on, be damned".
20 Q. Okay, we'll move on. Can we turn to page 17 of your
21 witness statement and paragraph 36. You say:
22 "The Inquiry has asked me to comment on a draft
23 email addressed to John Scott, (the [Post Office] Head
24 of Security) and Rob King (the [Post Office] Senior
25 Security Manager and his [that's Mr Scott's] deputy),

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1 which was sent to me and Simon Baker on 13 May 2013 by
 2 Dave Posnett (an Accredited Financial Investigator).
 3 The drafts contains a series of bullet point updates on
 4 the Spot Review process. It appears from the email that
 5 I had asked for draft [responses] to be sent to me for
 6 forward transmission to [Messrs Scott and King]
 7 I believe I requested this for two reasons. First, part
 8 of my role was sometimes to review and/or distil
 9 information provided by one part of the business
 10 comprehensibly for other parts of the business so that
 11 there was a consistent 'joined-up' position. Second, if
 12 the emails contained legal advice or concerned matters
 13 on which legal advice would be required then [the Post
 14 Office] would be better placed to claim legal
 15 professional privilege over the material if it had been
 16 sent to or received by a legal adviser."

17 Do you agree Post Office could not claim privilege
 18 over communications simply because they were sent by or
 19 to a lawyer?

20 A. Yes. You cannot claim privilege just because it's sent
 21 to a lawyer.

22 Q. Were you, by adopting this approach, routing emails like
 23 this through you, seeking to protect the communications
 24 in that way by making a claim of privilege available to
 25 you?

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1 was to inadvertently be sent to the wrong email address
 2 or intercepted innocently or otherwise, once out in the
 3 public domain it will be hard to control.

4 "Having agreed with Susan Crichton, with immediate
 5 effect, all information should where possibly placed
 6 onto a document and access is through a password
 7 protocol. The procedure is easy to use and only takes
 8 a matter of seconds."

9 Then there are some administrative details and then:

10 "Additionally commercially sensitive and/or legally
 11 privileged information should not be copied/pasted onto
 12 unprotected email text to make it more easily readable
 13 on a BlackBerry."

14 Why was a review conducted in mid-2013 of the
 15 management of and exchange of information with Second
 16 Sight?

17 A. I'm sorry? I'm sorry, it was a bit too quick. I didn't
 18 follow.

19 Q. Yes. Why was a review conducted in mid-2013 into the
 20 management of and exchange of information with Second
 21 Sight?

22 A. I don't know what triggered that.

23 Q. Can you recall --

24 A. Sorry, could I see the date of this?

25 Q. Yes, it's July.

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1 A. Yes, if the claim was available. If the communication
 2 was for the purposes of obtaining advice or advice sort
 3 of flowed from it, it raised issue -- it's -- the -- my
 4 recollection at this time was information was being
 5 created and generated, that some of it was new to Post
 6 Office and it was certainly newly created, for instance
 7 the Spot Reviews, and it wanted, I think, to understand
 8 what that was, take advice as appropriate on it, before
 9 it entered the public domain where its ability to
 10 address the information would be harder to manage.

11 Q. Can we look, please, at POL00142323. I'm afraid
 12 I haven't got the tab number for that. POL00142323,
 13 thank you. It's a one-page email from Mr Scott to,
 14 amongst others, you. You can see the distribution list
 15 at the top.

16 A. Yes.

17 Q. The subject is "Protection of Commercially Sensitive
 18 and/or Legally Privileged? Information", and Mr Scott
 19 says:

20 "A review has been conducted in respect of
 21 commercially sensitive and/or legally privileged
 22 information, in particular with the management of
 23 exchange of information subject to the Second Sight
 24 review. Whilst most information within this group will
 25 be [legally] privileged, nonetheless, if the information

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1 A. Oh, sorry. Now I see the date, I imagine that this --
 2 I don't know about the review but there was certainly
 3 an issue with potential shredding of -- I mean, reported
 4 shredding or suggestion to shred, however you want to
 5 describe it, of documents, I think in July -- around
 6 this time. I might need some help with the date but it
 7 certainly feels contemporaneous to this.

8 Q. Do you think this review into the management and
 9 exchange of information subject to the Second Sight
 10 review was, therefore, triggered by the allegation that
 11 some minutes of a meeting either had been shredded or
 12 were ordered to be shredded?

13 A. Sorry, I think there are two parts to that. I don't --
 14 I'm not aware of a review, in the sense of -- we had
 15 quite a few sort of quite formal reviews. I'm not aware
 16 of a -- including, say, of the past prosecutions -- that
 17 was about to commence at this time. So I'm not quite
 18 sure about that. But I think that -- I suspect the
 19 catalyst for this will have been what you described.
 20 I'm not sure about the format. Does that make sense?

21 Q. Do you know who conducted the review?

22 A. Well, that's what I say, I'm not really familiar with
 23 the concept of a review here.

24 Q. Mr Scott's was somebody whose department was under
 25 scrutiny in the course of the review, wasn't it? The

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1 Second Sight review?

2 **A.** Yes, I think security files were being provided, yes,
3 I think that's correct, yes.

4 **Q.** Is the way that investigators had conducted themselves
5 was something that some complainants had raised?

6 **A.** I don't know whether I was aware of that at the time but
7 I think that's correct, yes.

8 **Q.** Do you know whether Mr Scott conducted the review of
9 commercially sensitive and legally privileged
10 information?

11 **A.** As I say, I'm not familiar with the review, so I don't
12 know who may or may not have carried that out.

13 **Q.** Can I turn then to the Second Sight Interim Report of
14 8 July 2013. I think it's right you know that that
15 report referred to three bugs in Horizon: the receipts
16 and payments mismatch bug; the suspense account bug; and
17 the Callendar Square, sometimes called Falkirk, bug?

18 **A.** Yes.

19 **Q.** You know, I think, that Simon Clarke's advice of 15 July
20 was written in response to, amongst other things, that
21 Interim Report?

22 **A.** Can I say I'm afraid I get Mr Clarke's advices confused.
23 Can I be taken to the --

24 **Q.** Yes, we can look at the first advice, if you want to,
25 it's the 15 July advice, POL00040000. That's B65, if
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1 suspense account bug.

2 He doesn't, in fact, mention, Mr Clarke here, the
3 fact that Second Sight had been told about and picked up
4 the Callendar Square and Falkirk bug. Then he
5 continues, at 29:

6 "On Thursday, 27 June, Martin Smith of Cartwright
7 King was telephoned by [the Post Office]. There then
8 ensued number of conversations between [Martin Smith]
9 and senior [Post Office] executives. The import of what
10 [Martin Smith] was being told may be summarised thus: he
11 was informed by [the Post Office] that a report
12 commissioned from Second Sight by Post Office Limited,
13 and as yet unpublished, indicated that Horizon may not
14 be 'bug' free. There was much speculation as to the
15 content of the Second Sight Report. It appeared to [the
16 Post Office] that some within the organisation had been
17 aware of bugs affecting up to 30 offices including some
18 Crown Office branches. Jarnail Singh, Head of Criminal
19 Litigation, had been unaware and did not know how long
20 [Post Office Limited] had known of the existence of the
21 bugs nor indeed who at [the Post Office] had known."

22 So we've got Mr Clarke recording here that Mr Singh,
23 on being told of the possible conclusions of Second
24 Sight, as to bugs, said that he had been unaware and
25 didn't know for how long the Post Office had known of
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1 you want to look at it.

2 **A.** 65, was that?

3 **Q.** So we've got the Second Sight Interim Report picking up
4 the three bugs --

5 **A.** Correct.

6 **Q.** -- of 8 July 2013, and then this, seven days later.

7 **A.** Yes.

8 **Q.** We can see, if we go to the last page, which is page 14,
9 the date of the -- the date of Mr Clarke's advice. If
10 we go back to page 1, it's an "Advice on the Use of
11 Expert Evidence Relating to the Integrity of the Fujitsu
12 Services Horizon System". The Inquiry is very familiar
13 with this, so I'm not going to go through it at length
14 and, instead, take you to parts of it. Can we go to
15 page 10, please, and paragraph 28. Mr Clarke says:
16 "In considering this report [the Second Sight
17 Report] I only take account of those matters indicating
18 a prior knowledge of Horizon issues."
19 Then he says:
20 "The following paragraphs appear relevant", and then
21 he cuts in extracts from the Second Sight Report.
22 There at 6.5:
23 "The first defect", that's the receipts and payments
24 mismatch bug.
25 Then at 6.6, the second defect, that's the local
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1 the existence of bugs nor, indeed, was he aware who at
2 the Post Office had known, yes?

3 **A.** That's what it says, yes, I can see that.

4 **Q.** Keeping this in mind, in paragraph 46 of your witness
5 statement, I'm not going to ask for it to be turned up
6 at the moment, you tell us that, in relation to these
7 three bugs, that, prior to publication of the interim
8 report, your role was to collate and distil information
9 for the use of others considering the Post Office's
10 response to the interim report?

11 **A.** Yes.

12 **Q.** Yes?

13 **A.** Yes.

14 **Q.** Can you please help us; before the Second Sight Report,
15 had Mr Singh ever informed you that, in fact, he had
16 been the prosecutor in the case against Seema Misra?

17 **A.** I don't know about that particular status but I remember
18 seeing an email exchange where, when I was asked to --
19 I think we referred to it this morning, I was asked to
20 see if -- I contacted Bond Dickinson and DAC Beachcroft
21 to see if bugs had been referred to in any cases and
22 I saw that Jarnail seemed to have known about that, the
23 *Misra* case in that but I don't recall --

24 **Q.** I'm asking specifically whether, before the Second Sight
25 Report, Mr Singh had ever told you that he was in fact
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1 the prosecutor in the case of Seema Misra?

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

3 Q. Did he, before the Second Sight Report, tell you that

4 having been the prosecutor in the *Seema Misra* case, that

5 he had been told about the Callendar Square or Falkirk

6 bug --

7 A. I don't recall that.

8 Q. -- back in 2010?

9 A. Yeah, I don't recall that being said, no.

10 Q. That he had been told about a locking issue in Horizon

11 that had caused transactions to be lost?

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

13 Q. Did he tell you before or at this time that he had been

14 told back in 2010 that there were some 200,000 system

15 faults recorded in relation to Horizon?

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

17 Q. Did he tell you that part of the work that Fujitsu had

18 undertaken in the prosecution of Seema Misra was to

19 provide an estimate of what would be involved in

20 providing the defence with all change requests made at

21 the Horizon counter but that the Post Office had decided

22 not to go through with that work?

23 A. I'm not aware of that, no.

24 Q. Did Mr Singh tell you at that is time or before this

25 time that both he and Rob Wilson, the then Head of

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1 Was there any sense at this time, mid-2013, around

2 the time of the publication of the Second Sight Report,

3 that the Post Office was essentially saying this

4 information about the three bugs is newly acquired

5 information by Post Office?

6 A. It's -- I'm pausing to answer because it seemed to be

7 new to some people within POL, hence the -- you know,

8 the request to try to find the information and package

9 it up and present it to people. But by the same token

10 we seemed to be able to get answers to it.

11 Q. Are you saying that when the Interim Report came out and

12 these three bugs were mentioned, that was news to some

13 people within Post Office but not to everyone?

14 A. It was certainly news to some people and what I don't

15 know is, having been able to find people within the

16 business with some understanding of it, I don't think

17 I ever found out whether they'd started that enquiry at

18 the same time I had or had prior knowledge of it. So it

19 was certainly new to some people.

20 Q. Did you seek to ascertain when the Post Office had first

21 become aware of those three bugs?

22 A. I think that came out with some of the -- I didn't

23 proactively seek to find that out. I just tried to find

24 out what we knew and, through that, it was clear that --

25 I think somewhere in there there's a date that says,

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1 Criminal Law, had been personally informed about the

2 receipts and payments mismatch bug back in 2010?

3 A. I don't recall that no.

4 Q. That they had been engaged in discussions and

5 conferences as to whether or not to disclose that

6 information about the receipts and payments mismatch bug

7 to Seema Misra's defence team --

8 A. No, I don't recall.

9 Q. -- and that a decision had been made not to give

10 disclosure.

11 A. I'm not aware of that, no.

12 Q. If we can turn up paragraph 46 of your witness

13 statement, please. Paragraph 46, at the foot of

14 page 23. You say you have been asked to comment by us

15 on your knowledge in mid 2013 of the "local suspense

16 bug":

17 "I have been referred ... to some emails mentioning

18 it from around the same time as those relating to the

19 'Callendar Square bug' ... I believe that [the Post

20 Office had brought the 'local suspense bug', along with

21 the 'receipts and payments mismatch bug ... to Second

22 Sight's attention. The context in which I came to deal

23 with these bugs was the same as I have described above

24 ... and my role again was to collate and distil

25 information ..."

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1 "We've known about this since", I did a timeline where

2 I think it was amended to include a date, but that

3 wasn't a line of inquiry, it was more a consequence of

4 my request for --

5 Q. Wasn't that line of inquiry an important one to

6 ascertain when the Post Office had first become aware of

7 those three bugs?

8 A. Probably, yeah, I would say --

9 Q. Would you go as far as definitely?

10 A. Yes.

11 Q. I mean, if I give you an example, wasn't that

12 information critical to determining which prosecutions

13 might be tainted if full disclosure of the existence of

14 those bugs had not been given?

15 A. I have to say questions like that, I wasn't aware of at

16 the time. I had no idea of what the impact on

17 prosecutions might have been when I was being asked to

18 find information about the bugs.

19 Q. Wasn't that information that was of prime relevance to

20 which, if any, subpostmasters' contracts may have been

21 wrongly terminated?

22 A. Possibly, it depends on the basis of termination,

23 I think.

24 Q. Wasn't that information, ie "when did me in Post Office

25 know about the existence of these three bugs," relevant

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1 to the issue of which, if any, of Mr Jenkins' evidence
 2 may have been tainted?
 3 **A.** That's a criminal law matter so I can't give a view on
 4 that, I'm afraid.
 5 **Q.** To your knowledge, did anyone seek to ascertain which
 6 department or which individuals within such departments
 7 knew about the existence of those three bugs?
 8 **A.** I'm not aware of that, no.
 9 **Q.** Do you know why not?
 10 **A.** I'm sorry, I don't.
 11 **Q.** "We've got this report that says there were these three
 12 bugs. When did we, Post Office, first know about them
 13 and how does that affect the proceedings that we've
 14 brought against people, whether civil or criminal, and
 15 how does it affect contracts that have been terminated?"
 16 **A.** Well, I think there are two parts to that question.
 17 There's -- the first bit is when did we first know about
 18 that? Well, that seemed to be coming out from the
 19 request for information about the bugs, that the use of
 20 that -- as a segue, was it important to find out but
 21 I think it was being found out, from what I could see.
 22 Somebody said "Well, we first knew about it on this
 23 date, we told Fujitsu about it on that date". That's
 24 with respect to one of the two bugs, I can't remember
 25 whether we did it for both.

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1 Post Office was pretending that the Second Sight Report
 2 was revelatory of matters that it didn't know about
 3 when, in fact, that simply wasn't the case?
 4 **A.** Well, again, I don't know if I can speak for the whole
 5 company but there was -- I didn't get the sense of
 6 anybody pretending anything.
 7 **Q.** Can we --
 8 **A.** I didn't see any artifice around me, if that helps.
 9 **Q.** Can we turn to actions arising from the Second Sight
 10 Interim Report. Can we turn up, please, POL00006799,
 11 I think that's B79.
 12 **A.** Thank you. Yes.
 13 **Q.** If you go to the last page, please. You'll see that
 14 this is Mr Clarke's Further Advice of 2 August 2013 and,
 15 if we go to page 1, please, and paragraph 2, in
 16 paragraph 1, he says:
 17 "On 3 July I attended [the Post Office] in
 18 conference at ... Head Office ..."
 19 So this is an Advice written a month later where he
 20 is summarising or reflecting back what had happened at
 21 a conference on 3 July. Then in paragraph 2 he says:
 22 "One of the topics considered by the conference was
 23 that of disclosure: I advised that there ought to be
 24 a single, central hub, the function of which was to act
 25 as the primary repository for all Horizon-related

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1 What its impact was fed into -- was being shared
 2 with, certainly, the criminal lawyers at the time, who
 3 would advise on what the impact of that for prosecutions
 4 would be.
 5 **Q.** Did you get any sense, working as you did within the
 6 Post Office at a relatively senior level here, of the
 7 Post Office reacting as though Second Sight's report was
 8 revelatory of matters that it did not know about?
 9 **A.** Yes, I did have that impression.
 10 **Q.** At this time, mid-2013, did you know that there is
 11 evidence that the Post Office first knew about the
 12 Callendar Square/Falkirk bug way back in 2006?
 13 **A.** I think if it's Falkirk/Callendar Square, I think that
 14 seemed to have been a known issue in the company.
 15 **Q.** We've got evidence that Fujitsu had told the Post Office
 16 about the receipts and payments mismatch bug in 2010 and
 17 we've got evidence that the Post Office had known about
 18 the existence of the suspense account bug in 2012. In
 19 fact, knowing about it before Fujitsu did. Did those
 20 kind of -- did that information come to the surface at
 21 the time of the publication of the Second Sight Report?
 22 **A.** The only thing I can remember coming to the surface was,
 23 I think, the 2012 one. When we first knew it, I don't
 24 recall, I'm sorry.
 25 **Q.** Did you gain any sense at this time, mid-2013, that the

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1 issues. [It] would collate, from all sources into one
 2 location, all Horizon-related defects, bugs, complaints,
 3 queries and Fujitsu remedies, thereby providing a future
 4 expert witness, and those charged with disclosure
 5 duties, with recourse to a single information point
 6 where all Horizon issues could be identified and
 7 considered. The rationale behind the advice at the
 8 arrived from the need to protect [the Post Office] from
 9 the current situation repeating itself in the future."
 10 What did you understand "the current situation" to
 11 be referring to, the risk of which there was
 12 a repetition?
 13 **A.** I think bugs surfacing, which those who ought to be
 14 aware of them weren't.
 15 **Q.** Can we turn, please, with that context in mind, to
 16 POL00191968, B57.
 17 **A.** Yes.
 18 **Q.** You'll see it's your email of 12 July to Mr Scott,
 19 copied to others, including Ms Crichton, Mr Flemington
 20 and Mr Singh, with the subject of "Regular call re
 21 Horizon Issues". So I think, putting the chronology
 22 together, this is after the conference that we've seen
 23 summarised by Mr Clarke of 3 July 2013, yes?
 24 **A.** Yes.
 25 **Q.** You say:

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1 "... following [a call] earlier today, I set out
2 a draft email to go to the various 'Heads of' regarding
3 a weekly call during which any Horizon related issues
4 can be raised with the wider business."

5 You ask for comments. Then you say:

6 "... someone from Bond Dickinson should participate
7 in the calls we have with Cartwright King so that our
8 criminal law lawyers and civil law lawyers are aware of
9 what the other is doing. This will be especially
10 important as further Spot Reviews come in, which may
11 raise issues relevant to the prosecutions Cartwright
12 King are pursuing."

13 Then the text of the email:

14 "We are instigating a regular conference call during
15 which issues with Horizon, user experience and training
16 support can be shared across and known to the various
17 business units which use and rely on the system.

18 "[This] will aim to ensure that Horizon issues are
19 brought to the attention of user groups who might not be
20 aware of the issues, but whose use of Horizon may be
21 affected by them.

22 "To make sure we have all user groups covered, we
23 need to have a representative from each of the following
24 teams ..."

25 Then you set them out and you ask for

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1 necessary, development to take matters forward.

2 Q. So did you see it as a development caused by the
3 circumstances that the Post Office had got itself
4 into --

5 A. Yes.

6 Q. -- rather than there ought always to have been a process
7 by which information or evidence that was potentially
8 relevant to prosecutions was routinely collated,
9 recorded and made available?

10 A. Sorry, I'm struggling to hear. Sorry. There are two
11 parts there, again, I had the first but lost the second,
12 I'm sorry.

13 Q. Were you seeing this as a development that arose because
14 of the circumstances that the Post Office found itself
15 in --

16 A. Yes.

17 Q. -- rather than something that always ought to have been
18 in existence, namely a process by which information and
19 evidence potentially relevant to prosecutions was
20 routinely collated, recorded and made available to
21 prosecutors?

22 A. Yeah, I can't comment on the second part of it. I don't
23 know whether it ought to have been there or not but it
24 certainly seemed to be something that needed to be put
25 in place now.

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1 representatives to be put up, yes?

2 A. Yes.

3 Q. Can we go to paragraph 69 of your witness statement,
4 please, which is on page 35.

5 A. Thank you. Yes.

6 Q. You say in the third line, page 35, paragraph 69:

7 "My recollection is that the purpose behind the
8 calls was for issues with Horizon to be raised and
9 recorded so that there would be visibility of them
10 across the business and to avoid operating in silos.
11 I also recall that [the Post Office's] external criminal
12 lawyers were keen to have these calls so as to create
13 a record of Horizon issues which they could consider for
14 disclosure in prosecutions."

15 A. Yes.

16 Q. That can come down, thank you. Would you accept that
17 the advice that Mr Clarke had given, that we've seen
18 about the creation of a central repository, reflected no
19 more and no less than a duty that the Post Office had
20 always been subject to, to retain and record information
21 that was potentially relevant to its prosecutorial
22 function?

23 A. I don't think I can make that jump on whether it's part
24 of the prosecutor's duties or had or had not been. It
25 certainly seemed to be, to me, a pragmatic, in fact

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1 Q. Did it seem to you, even as somebody who was not expert
2 in criminal law, surprising that it was only in 2013
3 that steps were taken to ensure that material was not
4 held in silos?

5 A. Yes.

6 Q. In relation to this proposed hub or forum, were
7 technical specialists from the Post Office and Fujitsu
8 invited to attend and contribute to them?

9 A. I certainly think from the Post Office side there was,
10 I don't recall about Fujitsu.

11 Q. We've seen the cast list, the departmental cast list
12 that was previously set out, I don't think there's
13 anyone from Fujitsu on that, is there?

14 A. No, I don't think so, no.

15 Q. Why was that?

16 A. I don't -- I don't know. I may have put that together
17 quickly and I had a place holder. I don't know why it's
18 not there, I don't think it was -- sitting here today
19 I don't think it was a deliberate omission, put it that
20 way.

21 Q. You don't think it was?

22 A. I don't think it was a deliberate omission, I just --

23 Q. Well, if the intention or purpose of the hub was to
24 avoid operating in silos, why weren't Fujitsu invited to
25 attend?

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1 A. I have to say when I put that together I was still
 2 trying to get my head around how things worked.
 3 I didn't know who the right people were, which is why
 4 I had a place holder in the draft for other -- I don't
 5 know whether we had the internal capacity to deal with
 6 it ourselves. I think I had subsequently come to know
 7 that we didn't have the internal capacity. When I wrote
 8 that email, I wouldn't have known either way, I don't
 9 think.

10 Q. Going back, then, to Mr Clarke's first advice -- we
 11 skipped forward to his second to see something he had
 12 written about an event that had occurred in July. In
 13 paragraph 80 of your witness statement, which is on
 14 page 40, you say:

15 "The Inquiry has invited me to comment on two ...
 16 pieces of advice ..."

17 I've not taken you to the 19 July one yet. Then
 18 about five lines in, you say:

19 "I do ... recall that the 15 July 2013 advice raised
 20 Cartwright King's serious concerns about evidence which
 21 Gareth Jenkins had provided in prosecutions. I believe
 22 ... that those concerns would have been taken forward as
 23 appropriate [the Post Office's] criminal lawyers and
 24 recall there being a general consensus following this
 25 advice that Gareth Jenkins could no longer be used as

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1 A. Which tab is this one at, sorry? Is it 76?
 2 Q. B65.
 3 A. I beg your pardon. So it's between -- thank you.
 4 Thank you.

5 Q. If you look at paragraphs 33 to 35, did you form
 6 a view -- never mind the implications for historic
 7 convictions -- but did you form a view that the Post
 8 Office could no longer reasonably maintain that the
 9 Horizon system was robust in the light of, in
 10 particular, the opinion at paragraph 35?

11 A. Okay, I'm sorry, I've read that. Could I have the
 12 question again, please?

13 Q. Did you form a view that the Post Office could not
 14 reasonably maintain that the Horizon system was robust
 15 or had been robust in the light of Mr Clarke's opinion,
 16 in particular that at paragraph 35?

17 A. No, I didn't.

18 Q. Did you think that it was still open to the Post Office
 19 to say that, notwithstanding the advice it had received,
 20 it could say that Horizon was a robust system and the
 21 data that it produced had integrity?

22 A. I think that's -- it's -- to me, I don't think so and
 23 I don't think so because it's conflating quite a lot,
 24 some isolated examples, admittedly in an extremely
 25 serious context, I totally acknowledge that. But

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1 a witness in criminal proceedings."

2 Were you personally concerned by the advice given in
 3 relation to Mr Jenkins and its potential impact on the
 4 safety of historic prosecutions?

5 A. Again, there are sort of two parts to that question.
 6 Was I concerned? I saw there was concern from the
 7 criminal lawyers advising Post Office, so I assumed that
 8 wasn't -- I assumed that was well founded. I should say
 9 that's a positive thing. Quite how it would impact past
 10 prosecutions isn't something I could comment on.

11 Q. Did you form a view that some past convictions that had
 12 been founded upon Mr Jenkins' evidence were unsafe or,
 13 at least, were potentially unsafe?

14 A. I've never been able to form a view on the safety of
 15 convictions, I'm sorry.

16 Q. So you didn't?

17 A. I didn't know either way. It's what I could see is that
 18 the right people seemed to have raised it and would know
 19 what to do with it and they seemed exercised by it.
 20 That is my recollection. But quite what the impact of
 21 it would be, I had no frame of reference to measure it
 22 or judge it by.

23 Q. Can we, please, go back to Mr Clarke's advice.
 24 POL00040000. Can we turn up page 11 and look under
 25 "Discussion".

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1 I think in terms of the reliability and robustness of
 2 the system as a whole, you look at the operation of the
 3 system as a whole, which was what Post Office was doing,
 4 it was being used every day, and --

5 Q. There's so many thousand transactions --

6 A. Exactly, exactly.

7 Q. -- there's so many million customers, 1 billion a year,
 8 that line?

9 A. Yes, it's not a line, it is what was happening every
 10 day.

11 Q. It was the line though, wasn't it? That was the line to
 12 take, wasn't it?

13 A. Well -- no, it -- I'm sorry, that has a pejorative
 14 connotation to it --

15 Q. Absolutely.

16 A. -- what you're saying, and I don't believe it was, but
 17 it's -- it is a line that was used, yes.

18 Q. Why were the concerns about Mr Jenkins not taken to the
 19 police to investigate?

20 A. I don't know.

21 Q. Was there any discussion of that?

22 A. I don't recall that.

23 Q. Was there any discussion of which you were a party or of
 24 which you were aware that the police should be called in
 25 to investigate here?

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1 A. I don't recall that.
 2 Q. Was there any investigation conducted by the Post
 3 Office, of which you're aware, into Mr Jenkins and the
 4 matters that had been raised in Mr Clarke's advice?
 5 A. I don't recall, no.
 6 Q. Were any instructions given as to how the information
 7 contained in Mr Clarke's advice was to be handled and
 8 disseminated?
 9 A. I don't recall any discussions to that, no.
 10 Q. Was a decision made as to whether or not the information
 11 contained in the advice should be disclosed to past
 12 defendants, possible appellants, civil claimants,
 13 against the Post Office?
 14 A. At that time -- this was arising at the time where Post
 15 Office's disclosure duties in prosecutions was being
 16 considered. I don't know the extent to which the
 17 specific Jenkins witness evidence -- or this particular
 18 advice, I don't know to what extent that folded into it.
 19 So I think the answer is -- I'm sorry, if you give me
 20 the question again, I think I can answer it.
 21 Q. I'll put it another way. Do you know why the
 22 information in Mr Clarke's advice concerning Mr Jenkins
 23 was not disclosed until the criminal appeals in November
 24 2020?
 25 A. I don't know why it was -- I don't know why it wasn't
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1 concerns about this employee of Fujitsu with Fujitsu?
 2 A. So I worked with Womble Bond Dickinson to work out
 3 an approach that we could -- correspondence and a means
 4 by which we could raise the issue with Fujitsu, which we
 5 started off, I think, by looking at drafting a letter
 6 that would put it -- bring it to their attention.
 7 Q. Mr Williams, one conclusion that might be drawn from the
 8 fact that the Post Office or part of it acted as if the
 9 three bugs raised by Second Sight was revelatory, that
 10 no one investigated what knowledge the Post Office in
 11 fact had of the three bugs, and when, and no one
 12 disclosed the Post Office's view that the expert that it
 13 had placed reliance on was discredited was that the Post
 14 Office that now entered a cover-up mode; is that true?
 15 A. Again, there's quite a lot of things that don't --
 16 I think you're asking was -- could somebody see that?
 17 I think somebody probably could see that.
 18 Q. Is it factually correct? Was a decision made, "Let's
 19 not find out when we, in fact, knew about all of these
 20 bugs; let's at least some of us pretend this is
 21 revelatory?"
 22 A. That wasn't the impression I had.
 23 Q. "Let's not disclose to convicted defendants that we have
 24 taken this view of an expert, who has given evidence or
 25 a witness who has given evidence, either in writing or
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1 disclosed.
 2 Q. That can come down from the screen, thank you. Given
 3 that Mr Clarke's advice about Mr Jenkins concerned the
 4 probity and integrity of one of the architects of the
 5 system, Mr Jenkins himself, was consideration given to
 6 whether that had a wider implication on the reliability
 7 of the Horizon system itself?
 8 A. I don't recall that, no.
 9 Q. Were the concerns about an employee of Fujitsu, to your
 10 knowledge, then discussed with Fujitsu?
 11 A. No, I don't know.
 12 Q. What did you try to do to ensure that people in Fujitsu
 13 who needed to know this information got the information
 14 that one of their employees had, according to the Post
 15 Office, been given discreditable or tainted evidence in
 16 court?
 17 A. I'm sorry, can I check the privilege point on that
 18 because we're dealing with --
 19 Q. No, just answer the question.
 20 A. Okay, I'm sorry.
 21 Q. If somebody wants to take a point on privilege --
 22 A. I'm sorry, I beg your pardon.
 23 Q. -- they'll stand up.
 24 A. Thank you, can I have the question again, please?
 25 Q. What steps were taken, to your knowledge, to raise any
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1 orally in court, that we're now entering into a phase of
 2 seeking to cover up what's happened."
 3 A. I think to do that, that requires a positive decision,
 4 and I'm not aware of that decision having been made, or
 5 communicated to me or I became aware of that in any way.
 6 I accept actions weren't taken but whether that
 7 was -- I haven't -- I wasn't aware of anything that said
 8 that was a deliberate choice.
 9 Q. So you're not aware of any sort of master plan, as it
 10 were, that said, "Let's not investigate when we, in
 11 fact, knew about this; let's, to the outside world,
 12 suggest that Second Sight has uncovered something about
 13 which we didn't know. Let's not tell convicted
 14 defendants about the view we've taken of Mr Jenkins'
 15 evidence". There was no meeting of that kind or
 16 instruction of that kind?
 17 A. Not that I was aware of, in any way --
 18 Q. Did you view --
 19 A. -- or that I recall, anyway. I mean, I think I would
 20 have remembered something like that but I don't recall
 21 that, no.
 22 Q. Did you view the issue raised by Mr Clarke's advice as
 23 relating solely to the Post Office's past criminal
 24 prosecutions?
 25 A. Yes.
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1 Q. Accordingly, did you not consider the potential impact
2 on past civil actions?
3 A. No, I didn't.
4 Q. Did anyone do that?
5 A. I don't believe so.
6 Q. As a lawyer with significant experience of civil
7 litigation, at the centre of the team that was dealing
8 with Horizon at the time, if anyone had considered the
9 potential impact on civil proceedings, you would have
10 been aware of it, wouldn't you?
11 A. I would -- oh, yes, I would sorry. Yes.
12 Q. What did you, in fact, do as a result of the receipt of
13 the 15 July Simon Clarke Advice?
14 A. Well, I think I read it.
15 Q. And put it away?
16 A. I suspect, yes, it was being dealt with by what
17 I considered to be the -- what appeared to me, I should
18 say, to be the people who were advising the business on
19 the steps that should be taken. I'm not sure that what
20 I saw in there necessarily impacted other activities in
21 the business. He hadn't -- I don't know, I wasn't aware
22 of him giving evidence for any live proceedings at that
23 time where the particular issues raised in here were
24 germane.
25 Q. Going back to the advice, please. POL00040000, and
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1 Q. It was an important issue that demanded answers?
2 A. I don't know what the issue -- what the follow-on steps
3 from it were because that was for those with the
4 expertise to advise on.
5 Q. Was it not considered imperative to ascertain the
6 circumstances in which Mr Jenkins had given written and
7 oral evidence in some Post Office prosecutions and,
8 according to Mr Clarke, had breached his duties to the
9 court?
10 A. I really can't comment on matters of the criminal
11 justice system. I just had no familiarity with it and
12 what was required or not required. I'm sorry.
13 Q. Did you ask questions of Mr Singh or, indeed, any other
14 of the lawyers in the department or engaged in
15 discussions with them as to whether Mr Jenkins had been
16 properly instructed as to his or an expert's duties of
17 disclosure?
18 A. That I think I recall raising orally with Cartwright
19 King.
20 Q. What was the answer you got back?
21 A. I'm sorry?
22 Q. What was the answer you got back?
23 A. I don't recall one.
24 Q. Did you ever see any instructions which the Post Office
25 had provided to Mr Jenkins that might properly set out
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1 page 13, please. Under Mr Clarke's "Conclusions":
2 "What does this all mean? In short, it means ..."
3 I'm going to replace the text with the correct name:
4 "... that [Mr Jenkins] has not complied with his
5 duties to the court, the prosecution or the defence."
6 Then paragraph 38:
7 "The reasons as to why [Mr Jenkins] failed to comply
8 with his duty are beyond the scope of this review."
9 So in 37, Mr Clarke advised that Mr Jenkins had not
10 complied with his duties to the court, the prosecution
11 or the defence, and 38 said the reasons why he failed to
12 comply are beyond the scope of his, Mr Clarke's, review,
13 correct?
14 A. Yes.
15 Q. Do you agree, therefore, that it left that question very
16 much widely open?
17 A. I wouldn't have said very much widely open, I think
18 I would have said, if there were actions to be taken,
19 I would have expected them to have been advised on next
20 steps -- what else is to be done.
21 Q. Well, you would agree, I think, with this, that the
22 reasons why Mr Jenkins failed to comply with the duty
23 was an important issue.
24 A. That certainly seemed to be what the criminal lawyers
25 were saying.
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1 his duties to the court?
2 A. I haven't seen that but, also, I didn't -- I didn't look
3 for it.
4 Q. When you read this advice, did it give rise to any
5 concern in your mind that what you read might be
6 indicative of any broader prosecutorial failings by the
7 Post Office?
8 A. No, because I didn't know enough about the prosecutorial
9 process to know where it may lead. It certainly seemed
10 to be addressed seriously by those who understood the
11 context in which it was relevant. So I don't know where
12 else it would have gone beyond that, I'm afraid.
13 Q. Were you aware of any discussion within Post Office
14 Legal at this time as to whether the appropriate course
15 might be actually to speak to Mr Jenkins to understand
16 events from his perspective?
17 A. I don't recall that, no.
18 MR BEER: Sir, thank you. That's a convenient moment. It's
19 just up to 3.10 now, might we break until 3.25?
20 SIR WYN WILLIAMS: Yes, of course.
21 MR BEER: Thank you, sir.
22 (3.07 pm)
23 (A short break)
24 (3.25 pm)
25 MR BEER: Sir, good afternoon. Can you see and hear us?
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1 **SIR WYN WILLIAMS:** Yes, I can, thank you.

2 **MR BEER:** Thank you very much.

3 In the next set of questions, Mr Williams, please
4 don't worry about questions of privilege, they have been
5 resolved between the Inquiry and the Post Office.

6 **A.** I apology.

7 **Q.** No need to apology. Can we look, please, at
8 POL00193383.

9 Can you see at the foot of the page there's an email
10 from you to Lesley Sewell, Susan Crichton, Simon Baker
11 and Hugh Flemington of 11 August 2013, and you say:

12 "Lesley

13 "Please find attached two drafts of a letter to put
14 us 'on the record' with Fujitsu about the issues raised
15 in Second Sight's Interim Report, and the impact of them
16 on the court proceedings we bring.

17 "The drafts differ in tone:

18 "The 'shot cross the bow' aims to put pressure on
19 [Fujitsu] to work with us to improve Horizon and user
20 confidence in it;

21 "The 'letter of claim' goes further, tying the
22 issues to our contract with [Fujitsu] and escalating
23 them through its dispute resolution procedure.

24 "In either case, we need to set out what we want
25 [Fujitsu] to do. That should set the tone for the

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1 investigations are ongoing. In particular, Second Sight
2 highlighted the following areas of concern", and can you
3 see that six are then set out?

4 **A.** Mm-hm.

5 **Q.** Yes?

6 **A.** Yes.

7 **Q.** Along with a note saying, "This list is taken from
8 Second Sight's Report -- [the Post Office] needs to
9 carefully consider whether responsibility for these
10 criticisms falls on Fujitsu or [the Post Office]."

11 Then over the page:

12 "It is noted the above criticisms are a product of
13 only an Interim [Review] ... we know there are a number
14 of other potential allegations. Further details of
15 these issues will be presented once received from Second
16 Sight.

17 "One major area for concern is the scope and quality
18 of Fujitsu's support to Post Office in Court
19 proceedings. Where appropriate, Post Office commences
20 criminal prosecutions against subpostmasters believed to
21 have acted criminally. It also brings civil proceedings
22 ...

23 "Data from Horizon is integral to the success of
24 these court actions. It is imperative that this data
25 is, and is seen to be, reliable. Perceptions of

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1 letter -- the more aggressive we are, the more defensive
2 (and therefore less supportive) [Fujitsu] are likely to
3 be."

4 Can we look, please, at POL00140620.

5 **A.** Can I get a bundle reference?

6 **Q.** Yes, E77.

7 **A.** B?

8 **Q.** E77.

9 **A.** Yes, thank you. I have it. Thank you.

10 **Q.** This is headed up "Letter of Claim" and it appears to be
11 one of the two attachments to your email, albeit I'm not
12 clear whether it's the "shot across the bows" letter, or
13 the formal letter of claim letter. I don't think that
14 matters for present purposes because it's the content
15 that I wanted to discuss with you. Can you see it's
16 a draft letter to Fujitsu and says it's a letter to
17 claim pursuant to the practice direction?

18 In the background, it says:

19 "... Post Office has commissioned an independent
20 inquiry into Horizon which is being conducted by Second
21 Sight."

22 The report was published on the 8 July:

23 "Although the Report found no evidence of
24 system-wide problems with Horizon, a number of
25 criticisms were levied against the system and further

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1 weakness in the system or any suggestion that Post
2 Office or Fujitsu is attempting to hide weaknesses,
3 seriously undermines our credibility and significantly
4 increases the complexity and the costs of court
5 proceedings."

6 This is the paragraph I wanted to ask you about:

7 "Post Office was therefore disappointed to discover
8 that witness evidence prepared by Fujitsu may not have
9 been fully disclosing historic (albeit known and
10 resolved) defects. This has let Post Office having to
11 review all its historic criminal prosecutions for the
12 last three years (since the rollout of [Horizon Online])
13 to ensure that it has not breached its duties of
14 disclosure under the Criminal Court rules."

15 Was your reference to the witness evidence prepared
16 by Fujitsu a reference to the witness evidence of
17 Mr Jenkins?

18 **A.** I think it must have been, yes.

19 **Q.** Was it the case that the Post Office discovered, by the
20 Second Sight Report, that he, Mr Jenkins, may not have
21 been fully disclosing historic defects?

22 **A.** Sorry, the question again? You said from the Second
23 Sight Report?

24 **Q.** Yes, was it the case that the Post Office only
25 discovered from the Second Sight Report that witness

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1 evidence prepared by Mr Jenkins may not have fully
 2 disclosed defects in Horizon?
 3 A. That seemed to me to be the case.
 4 Q. What investigation had taken place by the time of you
 5 drafting this letter in August 2013 to be able to say
 6 that it was only the Second Sight Report that had caused
 7 the Post Office to discover those facts?
 8 A. I'm not sure, I'm sorry. I think the question is what
 9 investigations. I don't think any investigations were
 10 undertaken so my -- I think it must have been that that
 11 was the perception, the feeling, although, I have to
 12 say, this is also a draft, so we may have invited
 13 comment on it before progressing.
 14 Q. It's about that perception and feeling that I want to
 15 ask you. Remember before the break I asked you
 16 questions about pretending that it was only upon the
 17 publication of the Second Sight Report that the Post
 18 Office discovered facts that Mr Jenkins may not have
 19 been fully disclosing historic defects in Horizon. This
 20 is an example of that, isn't it?
 21 A. The perception that it was -- yes, it would be, yes --
 22 Q. That it was a new discovery?
 23 A. Yes.
 24 Q. A new fact?
 25 A. Yes.

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1 sorry.
 2 Q. Thank you. Could you translate what the first part
 3 says, please?
 4 A. It appears to be "Draft BPs".
 5 Q. Yes?
 6 A. So the first piece is "Horizon-FJ positioning". Then it
 7 appears to be "Draft BPs".
 8 Q. So if we can expand that first bit, please. "Draft", is
 9 that bullet points?
 10 A. It might be. That seems sensible but I don't know.
 11 Q. Then carry on translating please?
 12 A. "Reports didn't contain all they should have.
 13 "Reluctance to deal with known issues.
 14 "As a consequence", which would be consequence.
 15 Sorry, do you want it verbatim?
 16 Q. Yes, keep going.
 17 A. "... necess [which would be necessary] to review cases
 18 to determine to whether or not a partic deft ..."
 19 Q. Particular defendant?
 20 A. Correct:
 21 "... was prejudiced by absence of info."
 22 Q. Then scroll down, please. If you look at the next bit
 23 "Copies of Advice", can we blow that up, please. Just
 24 under the part we were looking at?
 25 A. I can probably do that from here "Copies of Advice"

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1 Q. I'll ask you again: what had been undertaken within the
 2 Post Office to discover whether that was true or not,
 3 that this was the discovery of a new fact, as opposed to
 4 something that the Post Office had, in fact, known about
 5 all along, the existence of the three bugs?
 6 A. We didn't do anything, I don't think.
 7 Q. Can we turn, please, to POL00155555. This is
 8 a manuscript note dated 2 September 2013. The
 9 authorship is not shown on the document but do you
 10 recognise the writing?
 11 A. It's mine.
 12 Q. You wrote this?
 13 A. I think so. It looks like mine, yes.
 14 Q. It appears to have been written by somebody, ie you, who
 15 had read Simon Clarke's advice of 15 July 013. It
 16 refers to conversations with Martin Smith of Cartwright
 17 King and Brian Altman KC. Can you see, if we pan out
 18 a little bit, please --
 19 A. Can I have the reference --
 20 Q. Yes.
 21 A. -- please? Just to help --
 22 Q. E96.
 23 A. Thank you.
 24 Q. Are you at E96?
 25 A. Yes, sorry, I am. I've just been reading it. I'm

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1 [arrow] Share under a common interest privilege."
 2 Q. Can you help us, to whom was the advice to be shared
 3 under a common interest privilege?
 4 A. I anticipate that would have been with Fujitsu.
 5 Q. Did that happen?
 6 A. I don't believe so.
 7 Q. Do you know why it didn't happen?
 8 A. No.
 9 Q. Then carrying on, please, the six statements.
 10 A. "6 statements as examples -- might [underlined] be 'tech
 11 correct' [which would be technically correct, I imagine]
 12 but no in substance."
 13 Q. So six statements as examples might be technically
 14 correct but not in substance.
 15 A. Yes, I think it might be missing a T.
 16 Q. Yes? And you've written that against paragraph 34 of
 17 the advice?
 18 A. It does look right.
 19 Q. Then underneath please?
 20 A. "It goes to Fairness/[I think that might be] obligations
 21 to do justice."
 22 Q. Then next "Telephone to MS"?
 23 A. Yeah, that's right:
 24 "Int Report revealed existence of bugs."
 25 Q. Then underneath does that say, "Clashed with Gareth"?

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1 A. I think it does, yes.
 2 Q. Then to the right-hand side of the squiggle?
 3 A. Then I've got:
 4 "[Without] this [that will be 'would've', would
 5 have] continued [with] premise all is okay (as per GJ)."
 6 Q. What does that mean? What are you saying in this note
 7 here? Are you referring, firstly, to a telephone
 8 conversation with Martin Smith --
 9 A. Yes.
 10 Q. -- of Cartwright King?
 11 A. Yeah, I'm going -- without this, I think that may be --
 12 I'm -- I fear I might be speculating a little bit
 13 because it's been a long time but "would have continued"
 14 presumably with prosecution activities, "with premise
 15 that all is okay".
 16 Q. As per Gareth Jenkins?
 17 A. "As per Gareth Jenkins".
 18 Q. So translating that, do you think that possibly means
 19 "Without the Second Sight Report we would have continued
 20 to prosecute on the premise that all is okay, as Gareth
 21 Jenkins said it was"?
 22 A. I think that's right yes.
 23 Q. Thank you. Then the box over to "Second Sight Report".
 24 A. "SS Report [equals] he tells of bugs not mentioned in
 25 his statements."

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1 "We do have an issue with how we share the info."
 2 Q. What was the issue and sharing with whom?
 3 A. I don't know what that's relating to. I don't --
 4 Q. Do you remember I asked you earlier about whether the
 5 Post Office had considered whether it needed to disclose
 6 the information in Mr Clarke's advice about a view that,
 7 essentially, Mr Jenkins was a tainted witness, he had
 8 breached his duties to the court, needed to be shared
 9 with convicted defendants? Do you think that was part
 10 of your discussion with Mr Smith?
 11 A. That's plausible but I don't know. It's -- having --
 12 Q. Why were you discussing these things with Mr Smith if
 13 your expertise was not in criminal law?
 14 A. I don't know. I may have been just the one who was
 15 asked to see what we did but I'm certainly speaking to
 16 Martin Smith, who does have the expertise. Sorry, I do
 17 know why -- I beg your pardon. Sorry, it's come back to
 18 me. One of the outcomes of the Second Sight Report was
 19 dealing with Fujitsu and I was asked to sort of help
 20 with that. That was sort of on my agenda.
 21 Q. Underneath Martin Smith and I think that says
 22 "inference" --
 23 A. Yes.
 24 Q. -- can you tell us what bullet point (1) is?
 25 A. I think that's:

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1 Q. Yes, and then on the right-hand side?
 2 A. His [statements] say we have lists to check but doesn't
 3 say [what types -- what -- oh, I'm sorry] what happens
 4 as an outcome."
 5 Q. Okay, then scrolling down, please. You asked the
 6 question, "What else?!?"
 7 A. Yes.
 8 Q. Is that a note to yourself?
 9 A. I don't know, it's -- certainly, it's my note, so --
 10 I don't quite no what that's referring to.
 11 Q. Do you think it means --
 12 A. There might be other bugs, I think that's -- I'm trying
 13 to --
 14 Q. Yes, if it's been discovered that Mr Jenkins has said to
 15 Second Sight -- ie he tells of bugs -- Mr Jenkins said
 16 things to Second Sight about bugs that were not
 17 mentioned in his statement, what else is there to
 18 discover about what Mr Jenkins has not said?
 19 A. I mean, that might be correct. I don't recall what
 20 I was putting that to, but ...
 21 Q. Okay:
 22 "We do have an issue" --
 23 A. "With how" --
 24 Q. -- is the next line.
 25 A. Yeah:

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1 "System designed to look for bugs, but doesn't
 2 mention any.
 3 "By implication, there are none [because] none are
 4 mentioned."
 5 Q. Then to the right-hand side, dealing with this page as
 6 we go down, you've written:
 7 "So -- we know of some of these ...
 8 "What were we doing to instruct [Gareth Jenkins]?"
 9 Do you remember I asked you before the break --
 10 A. That looks like --
 11 Q. -- the question of what the Post Office had done to
 12 discover the instructions that it had given to Gareth
 13 Jenkins were, and you said you don't think consideration
 14 was given to that or you couldn't recall any
 15 consideration?
 16 A. No.
 17 Q. It appears that such consideration was given by you?
 18 A. I thought I did say that I'd raised it with Martin
 19 Smith. I thought I did say that in my answer?
 20 Didn't I? I thought I did. I beg your pardon.
 21 Q. What was the product of your discussion with Martin
 22 Smith, then, as to the issue of what the Post Office had
 23 done properly to instruct Gareth Jenkins?
 24 A. I don't know from this. I don't think any actions were
 25 taken.

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1 Q. Was there any introspection at all here by the Post
 2 Office, "To what extent do we, as Post Office, bear
 3 a responsibility for what has been revealed by
 4 Mr Clarke's 15 July advice?"

5 A. Oh, yes, I would think so, and, on that, we'd have been
 6 asking those who advise on the appropriate -- who raised
 7 the issue on the appropriate steps to take next.

8 Q. Was anything specifically done to answer the question
 9 that you raise there, "What were we doing to instruct
 10 Gareth Jenkins"?

11 A. Sorry, the question again? I'm still familiarising
 12 myself with the document, I'm afraid, sorry.

13 Q. What was done to take that issue forwards, to your
 14 knowledge? Discovering what the Post Office had done
 15 properly to instruct Gareth Jenkins?

16 A. I don't know that anything was done.

17 Q. Was there any sense that you're aware of, "Let's best
 18 not answer that question because we might not like the
 19 answer"?

20 A. Not that I recall, but ...

21 Q. Carrying down on the left-hand side, please:
 22 "M Smith."
 23 First point:
 24 "Don't think ..."

25 A. "Don't think has ever been advised of his duties."

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1 Limited on the charge sheet. We owe duties to the
 2 court. There needs to be some investigation here of
 3 what we, the Post Office, have done wrong, if anything.
 4 Can you look that, please, Martin", rather than lumping
 5 it all on Mr Jenkins?

6 A. I don't know if we were doing that. This was
 7 a discussion on how to take something forward with
 8 Fujitsu with the criminal lawyer and I would have
 9 expected through this, given I'm not a criminal lawyer,
 10 for the advice on what's appropriate or not to be taken
 11 to be coming in that -- or from the expert.

12 Q. Underneath, does that say "started with Misra 2010"?

13 A. Yes.

14 Q. Then if you can read the final three bullet points on
 15 that page.

16 A. "Has turned up since (but not given)."

17 Q. So does that mean, do you think, in context, Mr Jenkins
 18 had turned up to court since 2010, since *Misra*, but
 19 hadn't given evidence as, in fact, was the case?

20 A. That's my understanding, yes, I think that's right.

21 Q. "His duty is to the court."

22 A. Yes.

23 Q. Then what does the last bullet point say?

24 A. It seems to say:
 25 "Seem to rely on this -- CK haven't done anything

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1 Q. Who's the "he"?

2 A. That must be Mr Jenkins, I think. Must be Mr Jenkins
 3 sorry, my voice dropped.

4 Q. So your criminal law expert was telling you that he
 5 didn't think that Mr Jenkins had ever been advised of
 6 his duties. What was done as a result of that?

7 A. Again, I don't know, I'd been looking to Martin Smith
 8 for the reaction to that.

9 Q. But you're the company lawyer, aren't you? You're the
 10 Post Office lawyer, and your external lawyer is telling
 11 you "We don't think this expert, who Simon Clarke has
 12 written a very powerful advice about, with very
 13 concerning and difficult conclusions in, was ever
 14 advised by the Post Office or anyone of his duties";
 15 what did you do with that information?

16 A. I do recall but I cannot say as in the context of this,
 17 I remember in the various discussions I may have had
 18 with Martin over the time that, if there was action we
 19 needed to take, they --

20 Q. So what action was taken?

21 A. None but it was saying, you know, if you tell us we need
 22 to do something, I genuinely think Post Office would
 23 have been doing it.

24 Q. Well, did you say back "That's an important point. We,
 25 after all, are the prosecutors here. It's Post Office

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1 since."

2 Q. Do you know what that means?

3 A. No, I'm sorry.

4 Q. Then the final part on the right-hand side of the page,
 5 underneath the part that was double underlined, "Signed
 6 statements ..."

7 A. "... after telling SS of the bugs."

8 Q. Does that mean that Mr Jenkins -- or you were being told
 9 that Mr Jenkins had continued to sign witness statements
 10 that didn't make mention of bugs, even after telling
 11 Second Sight of the bugs?

12 A. I think so, yes.

13 Q. We'll come to that later in this phase.
 14 "[Fujitsu] will say", can you translate the rest,
 15 please?

16 A. "It's up to defence council to raise the issue."

17 Q. Do you know what that is? Is that Mr Smith speaking
 18 there?

19 A. I don't know, I don't know who put that. It may have
 20 been me, it may have been him.

21 Q. Can you help us with the context of that, ie "Fujitsu
 22 will say it's up to defence counsel to raise the issue"?

23 A. My guess is, in terms of bringing this to the attention
 24 of Fujitsu, they'll say, "Well, you were conducting the
 25 prosecutions, you should have told them 'It's your

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1 fault'."

2 Q. Then the last part on that page, in the bottom right?

3 A. I think it's:

4 "Wholly affected -- [I think that might say 'it's

5 cute']."

6 Then it's:

7 "Are FJ legal review this?"

8 Q. "Are [Fujitsu] legal reviewing this", yes?

9 A. And then quotes:

10 "And correctly account for it'.

11 "Misleading."

12 Q. Can you help us with what that note means?

13 A. No, I'm sorry, I don't know what "this" is.

14 Q. Well, one of there employees might have breached their

15 duties to the court, presumably?

16 A. I don't know. I'm sorry. I don't know if that is --

17 Q. Okay, over the page, please, to page 3. Is this

18 a continuation of the same note?

19 A. Quite possibly, yes.

20 Q. Can you help us with what the first part means?

21 A. It says:

22 "[Fujitsu]: this is how we did it and confirm."

23 Q. Yes?

24 A. "Plus we don't do 'bug free' -- it's up to you what you

25 do [with] the system.

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1 an expert witness, in breach of its own legal duties,

2 then that was serious?

3 A. Well, I didn't know what the duties -- what Post

4 Office's duties were, which is -- as a prosecutor --

5 which was speaking to the criminal lawyers.

6 Q. We've seen a note which says, "We don't think he has

7 ever been advised of his duties"; did you think that was

8 serious?

9 A. Well, I don't know. I'm not sure in the civil context,

10 when we -- oh, no, we didn't with experts, you're right.

11 So yes, yes, I do think it's serious.

12 Q. Why were you having this conversation with Mr Smith?

13 A. Well, because we wanted to raise it with him -- we

14 thought it needed to be raised with Fujitsu. That is --

15 what are we going to raise with Fujitsu?

16 Q. The type of issues we see discussed here, namely

17 a record of a witness continuing to sign witness

18 statements that failed to mention bugs, even though he's

19 told Second Sight about them; a record of the breach by

20 the witness of his duties to the court; a realisation

21 that he, it is said, has not been advised of his duties

22 to the court; were they, to your knowledge, ever raised

23 with the Post Office Board?

24 A. I don't know with the Board, I think they were put in --

25 there are other drafts of letters to Fujitsu, I think --

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1 "Plus (per CK) [defence] counsel should raise this."

2 Q. Is this Mr Smith telling you what he thinks Fujitsu

3 might say, you recording what you think Fujitsu might

4 say, or something else?

5 A. I don't know now, I'm sorry.

6 Q. Then I think the rest is either irrelevant or

7 ascertainable and irrelevant.

8 Do you think, by this time, the Post Office had

9 realised that it had failed to instruct Mr Jenkins

10 properly as an expert witness?

11 A. Yes, I -- Post Office employee, so yes.

12 Q. If the Post Office had failed to instruct Mr Jenkins

13 properly as an expert witness in accordance with its,

14 the Post Office's, own legal duties, would you agree

15 that that was a serious issue?

16 A. If we'd been advised it was, yes.

17 Q. Would you not regard it as serious of itself, without

18 having to be told?

19 A. In this context, I mean, we knew it was serious, because

20 it had been raised but what to do with it? Again, I --

21 I'm sorry, can have the question again?

22 Q. If it was the case that, as this note may indicate -- it

23 can come down, incidentally -- that the Post Office

24 through you realised or had been advised that the Post

25 Office had failed to instruct Mr Jenkins properly as

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1 Q. Yes, I'm talking --

2 A. -- which were --

3 Q. We can see what said in that draft letter.

4 A. Yes, there were others.

5 Q. I'm asking where else that information was directed?

6 A. I --

7 Q. Was it sent up to the board, to your knowledge?

8 A. I -- no, not to my knowledge, no.

9 Q. Was Second Sight told about it?

10 A. No, not to my knowledge.

11 Q. Was the Mediation Scheme Working Group told about it, to

12 your knowledge?

13 A. I don't know whether they were or weren't.

14 Q. Was Mr Altman KC told about it?

15 A. Of the issue with Gareth Jenkins?

16 Q. No, the -- I'm taking it beyond the issue with Gareth

17 Jenkins. I'm talking about a realisation that the Post

18 Office itself may have failed to instruct Mr Jenkins

19 properly as to his duties?

20 A. Quite possibly not. Put it this way: I don't recall him

21 being told that, no.

22 Q. Was it to your knowledge raised with the CCRC?

23 A. No, not unless that sort of came out from the advice

24 notes we've had, no.

25 Q. To your knowledge, was the first time that the Post

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1 Office acknowledged to any external body that Mr Jenkins
2 had not been properly instructed as an expert until this
3 Inquiry?

4 A. Quite possibly, yes. Oh, it may -- I don't know, it may
5 have come out in the Court of Appeal proceedings.

6 Q. I don't think there was any, from memory, direct
7 acknowledgement in the Court of Appeal proceedings by
8 the Post Office that that was so?

9 A. I'm sorry, I'm speculating there. I beg your pardon.

10 Q. Can we turn, please, to POL00125758. I'll give you the
11 tab number in a moment.

12 B176, Mr Williams.

13 A. 176?

14 Q. Yes, B176. Have you got that?

15 A. I beg your pardon, yes, I have. Sorry.

16 Q. You'll see this is a speaking note for a meeting with
17 the CCRC on 8 May 2015.

18 A. Yes.

19 Q. You can see who the attendees were intended to be. From
20 Post Office's side you and the General Counsel,
21 Ms McLeod.

22 A. Mm-hm.

23 Q. Did you write this speaking note?

24 A. I think -- I think I may well have done.

25 Q. Yes, and if we just scroll through it please, you

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1 From your knowledge and understanding, was that the
2 first time that the attribution of branch losses was
3 raised? In early 2012?

4 A. I think -- I don't know when PMs started attributing
5 branch losses.

6 Q. You knew I think about the *Castleton* case?

7 A. Yes.

8 Q. So he had been doing it in -- making that suggestion in
9 the early 2000s?

10 A. Correct, yes.

11 Q. You knew about the Seema Misra case and she had been
12 making that suggestion in 2009 and 2010?

13 A. Correct.

14 Q. Did you know about the Computer Weekly article that
15 summarised half a dozen or so subpostmasters who said
16 exactly the same thing?

17 A. I'm aware of that article now, I don't quite know when,
18 but it was likely by this time that --

19 Q. By mid-2015 you would have been aware of the Computer
20 Weekly --

21 A. Yes, yes, absolutely.

22 Q. Okay, so is it right then that this is not supposed to
23 be a comprehensive account of when problems with Horizon
24 first arose?

25 A. No, I think what I've done here is PMs at some point

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1 proposed to set out the background to the Complaint
2 Review and Mediation Scheme.

3 A. Mm-hm.

4 Q. Post Office as a retailer, it's the UK's largest branch
5 network; 11,500 branches, 8,000 agents; postmasters
6 handled Post Office's money; £70 billion in cash;
7 there's a duty to account, under contract and common on
8 law, under agency, for daily cash declarations, weekly
9 balances and monthly trading rollover periods; Post
10 Office monitors branch accounts, there's an audit if
11 questions about declared levels of cash holding; if
12 audit reveals a shortfall, then the Post Office seeks to
13 rock under a contractual right that shortfall, and you
14 quote in clause 12 of the contract; suspend;
15 termination; potential prosecution, if conduct is
16 suspected; prosecutions under the POA about 50 a year.

17 Over the page, please. Post Office uses the Horizon
18 accounting system in every branch, it's supplied by
19 Fujitsu. First introduced in 1995, online in 2010.
20 60,000 users or more, processing 6 million transactions
21 a day, 2 billion transactions a year. 500,000 users
22 since launch. The key principles of it, 2.3, some
23 postmasters started attributing branch losses to
24 Horizon. Early 2012, James Arbuthnot asked the Post
25 Office to look into it.

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1 started attributing losses but then, in early 2012,
2 that's when Lord Arbuthnot --

3 Q. Okay --

4 A. -- I'm not seeking to say it started in 2012, I think
5 that's a --

6 Q. Okay, in 2012, Post Office instructs Second Sight to
7 look at some of the cases. The first report was in July
8 2013, and you cite the no evidence of
9 system-wide/systemic problems with Horizon software, but
10 issues with the way we dealt with individual
11 postmasters.

12 Post Office was very concerned about the impact on
13 criminal cases. It considered the July '13 report
14 against the prosecutors duty of continuing disclosure,
15 set up a "sift review" process. Suitability was checked
16 by Brian Altman, made disclosures as a consequence.
17 Revisited its approach to agent engagement.

18 Then 2.5.

19 "Scheme to resolve individual complaints."

20 You'll read what's summarised there.

21 A. Yes.

22 Q. Then over the page. 2.6:

23 "Focus of complaints continues to be ... processes
24 and practices."

25 The Second Sight investigations, you told the CCRC,

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1 have shown that the majority of branch losses were
 2 caused by errors made at the counter.
 3 Second Sight expressively accepts it is not
 4 an expert in criminal law and procedure but still, in
 5 Part Two, state the Post Office might not have
 6 investigated claims properly, have the evidential
 7 foundation to bring the criminal charge. These
 8 statements have entered the public domain and may
 9 encourage people to take action. Other avenues being
 10 pursued.
 11 Then "Categories of Responsive Documents", under
 12 section 17 notices, if you just scroll to the end, you
 13 enter into a practical discussion about provision of
 14 material, yes?
 15 A. Yes.
 16 Q. Why is there no mention there of what the Post Office
 17 had found out about Mr Jenkins?
 18 A. I think, by this stage, we had disclosed -- we may have
 19 disclosed the Brian Altman advice reviewing the -- what
 20 I understood the impact of the Jenkins issue was, was
 21 that it triggered Post Office's duty to make further --
 22 to consider further disclosure in cases --
 23 Q. Of the Second Sight Report?
 24 A. Of the Second Sight -- of the materials that we'd been
 25 advised to disclose, which I think was, in some cases,

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1 A. -- if that was done. I don't want to mislead. That's
 2 my recollection but I'd like to check it.
 3 Q. Why wasn't it something volunteered?
 4 A. I don't know. We -- some things were volunteered,
 5 I think, but it wasn't a --
 6 Q. I'm asking about this one.
 7 A. No particular reason. The material they asked for was
 8 provided, it indicated what else there might be and
 9 I don't know at this time, but certainly the process we
 10 had going forward with them was not to show them what we
 11 thought they might be interested in but for them --
 12 Q. To rely --
 13 A. -- to conduct on their -- yeah, well, for them to
 14 conduct their investigation and follow the lines of
 15 inquiry that they would want to. That was the repeated
 16 advice I recall us receiving, is the CCRC would conduct
 17 their own investigations and should be left to it.
 18 Q. Can we look, please, at POL00103238. I'll just wait for
 19 Mr Stevens to turn that up. POL00103238, B182, please.
 20 A. B182. Thank you. Yes.
 21 Q. Can we turn to page 2, please, and scroll down. We can
 22 see an email here of 1 August 2016 and, if we scroll on,
 23 please -- if we keep going -- we can see that it's sent
 24 by Amanda Pearce, the group leader of the CCRC. If we
 25 go back to the beginning of the email, please. She

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1 the Second Sight Report and in some cases -- most cases
 2 I thought it was both -- the Helen Rose Report. That
 3 process had been reviewed by Brian Altman and the advice
 4 on that had, I think -- although I'd like to check the
 5 dates -- been shared with the CCRC by the 8 May 2015.
 6 If it hadn't been it was around the time of this, it was
 7 disclosed --
 8 Q. The Simon Clarke advice --
 9 A. Er --
 10 Q. -- of 15 July 2013?
 11 A. I don't think the Cartwright King advices were shared.
 12 Q. Why was that?
 13 A. We tended to respond to requests for information from
 14 the CCRC and we -- it was -- the Cartwright King advice
 15 was referred to in Brian's advice and we invited the
 16 CCRC to tell us which documents they would like from it,
 17 and some of those were, I believe, provided, but not
 18 those. I think that's what --
 19 Q. How would the CCRC know about the Clarke advice?
 20 A. It would have been referenced, I think, I hope -- well,
 21 I can -- they would only know, I think, if it's properly
 22 referred to in Brian's advice.
 23 Q. Mr Altman's advice?
 24 A. Would you like me to check to see whether that --
 25 Q. No, it's okay --

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1 says:
 2 "Hi Rodric ..."
 3 Then under "Documents":
 4 "I'm afraid I've also got some further requests for
 5 information and documents."
 6 Under "Documents":
 7 "We met with Ron Warmington of Second Sight ... He
 8 mentioned a couple of documents we think it would be
 9 helpful to see (i) the thematic spreadsheet which Second
 10 Sight created identifying the alleged faults/problems;
 11 and (ii) a June 2014 report which Mr Warmington prepared
 12 on [the Post Office's] Investigations Department and
 13 prosecution process. I attach a section 17 notice to
 14 cover this request ...
 15 "2. We are trying to locate the transaction logs
 16 for the Misra case. We haven't been able to find them
 17 in the data room. We have found a 255-page 'event log'
 18 and a 29-page log of 'Transactions ...' but no sign of
 19 the full transaction logs. If the logs weren't printed
 20 out for trial are you still able to access them ...
 21 (... I haven't sent a ... section 17 ..."
 22 Then scroll down:
 23 "1. In November 2015, Computer Weekly reported
 24 an issue whereby payments had been duplicated on
 25 Horizon. It was reported that this was used by the user

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1 forcing log off. We have also seen this referred to as
2 the 'Dalmellington Error'. Would it be possible for POL
3 to provide us with an explanation of this issue ...

4 "2. We've seen numbered of references to the
5 'Receipts and Payments Mismatch Problem' which, we
6 think, has also been referred to as the Callendar
7 Square/Falkirk problem. Are we right in thinking that
8 they're the same thing ...

9 "3. We've seen references to some sort of 'fault
10 log' produced by [Horizon]. I understand ... that this
11 has been variously referred to as the 'PEAK incident
12 reports', 'PinICL', and the 'Known Error Log'. Do these
13 refer to the same thing? Is it one document or is it
14 a series of documents ... I'm trying to get a better
15 sense of what they are ..."

16 Agree all very relevant, direct and penetrating
17 questions?

18 A. Yes.

19 Q. Can we scroll up, please, to page 2 and keep going to
20 the top of page 2, there, thank you. You send this on,
21 if we just look at the bottom of page 1. That's from
22 you. You send that email on to Andrew Parsons and
23 others and say, "Can we discuss it?":

24 "I'd like to start thinking about whether and how we
25 can start forcing the issue with the CCRC -- they've

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1 Weekly. I think the -- I mean, I'll be frank, I think
2 that's just me writing a short email. I think what
3 I was trying to actually do is, what Post Office's
4 approach to the CCRC had been was to, as I said before,
5 leave them -- and that was the consistent advice, leave
6 them to their investigations. They knew what they were
7 doing and how they would go about it.

8 I think, around this time, because the Group
9 Litigation had started -- I think it started what, in
10 April 2016 -- there was some discussion around how long
11 does this take? That's a question I was frequently
12 asked. I thought it important to at least think about
13 testing what had been our position and to see whether it
14 was still viable and valid. Is how we've been dealing
15 with this appropriate? Should we be thinking about
16 doing something else? And that's what I was trying to
17 do there, you know, is this is an ever-expanding, you
18 know, running down a rabbit hole, as I seem to have
19 intimated there or should we stick to what we had been
20 doing and what I believe we continued to do, which is to
21 engage with them as they required from us.

22 Q. It's that siege mentality again, isn't it, Mr Williams?
23 Challenges to the Post Office are hostile and must be
24 fended off, rather than considered on their merits?

25 A. I think that's maybe overstating it but it's -- there's

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1 been looking at these for a long time and seem to be
2 jumping down every rabbit hole they're directed to ..."

3 Why did you think the CCRC was jumping down rabbit
4 holes?

5 A. Two reasons, I think now. The Computer Weekly issue was
6 the -- I think it referred to an outreach bug, which
7 I think, when we'd discussed it -- I don't know where it
8 came from -- seemed to have been a recent event. I'm
9 not sure whether that actually is the case or not but
10 that's what I recall being at the time. And I -- but
11 I think, more pressingly, they'd asked for quite a bit
12 of disclosure on an Employment Tribunal claim that, as
13 far as I was seeing it, was an Employment Tribunal
14 matter, not a -- it was unrelated to any prosecution
15 material and it just -- what I think was going on there
16 was what we had -- certainly, my impression of what we
17 were seeing was lots of people raising lots of issues
18 that would get looked into and not go anywhere, and just
19 extend the period of review without reaching
20 conclusions.

21 Q. You've just agreed with me a couple of minutes ago that
22 the questions that the CCRC were raising with you were
23 relevant, direct and penetrating issues. Why did you
24 think they were going down rabbit holes?

25 A. I think -- I've just said, for example, the Computer

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1 probably something in that, I think that's fair.

2 Q. You say that they're being directed to rabbit holes.
3 Were you paranoid that others were acting in concert
4 with the CCRC?

5 A. I had -- well, I'd said "seemed to be". I didn't know
6 whether these were things they got to on their own or
7 with prompting but I'm quite sure they would have been
8 doing what they do with us, which is their own
9 investigation impartially.

10 Q. Did you think they were lacking impartiality?

11 A. No, not in any way.

12 Q. Why did you want to force the issue with the CCRC?

13 A. I wanted to start thinking about whether we can. As
14 I say, to me this is testing is our approach still the
15 right one? And it turns out, I believe, as are
16 subsequent actions -- it was the right one, to continue
17 to lead them to do the job as best they knew.

18 Q. Is there really an option there? On the one hand, we
19 should leave the statutory body that investigates
20 possible unsafe convictions and miscarriages of justice
21 to get on with its work, or we stand in their way?

22 A. I don't think so but I was often asked -- I seem to
23 recall being asked "When are they getting back? What
24 can we do?" And it helped me to be able to say, "Look
25 this is the approach we've been taking. You know, we

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1 are keeping it under review, we test it, and it is still
 2 the right thing to do", even if it seems, as you just
 3 said, you know, frankly obvious. I think it's important
 4 to keep things under review.
 5 **Q.** Can we look at a different aspect of this, please. And
 6 turn to paragraph 76 of your witness statement -- that
 7 can come down now -- which is on page 38.
 8 **A.** Sorry, yes.
 9 **Q.** I think that must be a rogue reference. I'll move on,
 10 POL00066789, which is tab B64. This is an email chain
 11 between you and Mr Smith regarding disclosure of the
 12 Helen Rose Report. You remember what the Helen Rose
 13 Report was?
 14 **A.** Yes.
 15 **Q.** Can you, for those less familiar, summarise your present
 16 understanding of what the Helen Rose Report was?
 17 **A.** I think the Helen Rose Report -- it is unfortunate, we
 18 tried for a while to have it referred to as the Lepton
 19 report because it concerned a branch rather than
 20 an individual -- was an issue raised by a member,
 21 I think, of Post Office's Security Team in connection
 22 with an issue revved by Second Sight's Spot Review --
 23 ultimately thorough a Spot Review, on -- I actually
 24 can't remember what the technical piece is, but it's how
 25 system reversals, I think, are visible from information

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1 section) or the non-privileged material (eg the
 2 background transaction data) repackaged for disclosure
 3 to the defence.
 4 "If you advise that Helen's report does not attract
 5 any privilege, please ensure the reference to privilege
 6 is removed from the header (I don't want someone else to
 7 say the report is privileged, but that we waived thereby
 8 giving rise to possibly difficult issues of collateral
 9 waiver)."
 10 So you were asking Mr Smith why the report was being
 11 disclosed first, yes?
 12 **A.** Yes.
 13 **Q.** And you were asking for advice on its privileged status.
 14 On what basis did you consider the report to be
 15 privileged?
 16 **A.** Well, I wasn't sure whether it was privileged or not,
 17 which is why I was asking the question. But I had
 18 understood, when this came out, that the report, as in
 19 the physical report, had been prepared for -- for the
 20 purposes of obtaining legal advice, as in "Here's
 21 an issue, what do we do?"
 22 **Q.** So what did you think that occasion of privilege was?
 23 Obtain legal advice about what?
 24 **A.** Well, whether it raised issues that needed to be
 25 disclosed.

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1 derived from Horizon.
 2 **Q.** Thank you.
 3 **A.** A question about whether it was the reversal was
 4 generated by the system or by a user.
 5 **Q.** Can we turn, please, to page 4 of this chain. At the
 6 foot of the page, in the context of the case against
 7 Mr Ishaq in July 2013, Martin Smith sending a copy of
 8 a letter to Mr Flemington and copied to you, to be sent
 9 to Mr Ishaq's solicitors. Then up the page, please --
 10 keep going -- we can see your reply on 10 July 2013:
 11 "Thanks Martin.
 12 "First point? We presume that Helen Rose's report
 13 is being disclosed because [the Post Office's] evidence
 14 in the prosecution included an ARQ report. Is that
 15 right?
 16 "Second point -- Helen Rose's report is marked
 17 'Confidential and legally privileged'.
 18 "I understand she did this because she prepared the
 19 report to give to Post Office Legal for legal advice on
 20 the implications of her investigation (please call on
 21 [her number] to confirm).
 22 "Please therefore consider what information from the
 23 report needs to be disclosed to Mr Ishaq's solicitors
 24 and in what format, ie whether parts of the report
 25 should be removed or redacted (eg the Recommendations

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1 **Q.** No, why did you think it was possibly the case that the
 2 Helen Rose Report enjoyed privilege?
 3 **A.** It's the same, because I thought it had been prepared to
 4 give to the Post Office Legal for advice. We found this
 5 issue, what are the legal implications, Post Office
 6 Legal? That's -- whether that actually was the case or
 7 not, I don't know, which is why I was asking Martin
 8 Smith what his view on it was. And it was marked
 9 privileged, which I know isn't determinative of
 10 anything, but somebody thought it was privileged and
 11 I wanted to know -- not having any familiarity with the
 12 criminal justice system --
 13 **Q.** In any event --
 14 **A.** -- I -- I wanted the expert to tell us what to do.
 15 **Q.** If we move up, please, to page 1., at the foot of the
 16 page, Mr Smith says:
 17 "Rodric ..."
 18 Then there's an explanation of privilege. Second
 19 sentence:
 20 "I guess here you suggest that such privilege
 21 attaches because of by reason of [the Post Office's]
 22 contemplation of adversarial proceedings involving
 23 Fujitsu."
 24 Is that right? You thought that Helen Rose's
 25 report --

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1 A. No.
 2 Q. No?
 3 A. No.
 4 Q. That's just way off beam?
 5 A. It was, yes.
 6 Q. "... in criminal litigation, the emphasis is on ensuring
 7 a defendant is not prejudiced by the absence of material
 8 which would otherwise assist him or undermine the case
 9 against him ... criminal disclosure law trumps civil
 10 privilege, but only in circumstances where the material
 11 in question meets the test for disclosure ..."
 12 Quite a lot in there.
 13 "Thus there are only a limited number of ways in
 14 which we can prevent disclosure of material which we
 15 would otherwise be required to disclose to defendants."
 16 Then over the page.
 17 "Seek a Public Immunity [I think that's meant to
 18 mean "public interest immunity"] Certificate from the
 19 trial judge as we did in [another case]. To achieve
 20 this we would need to demonstrate a real public interest
 21 in non-disclosure [or]
 22 "Terminate the prosecution."
 23 Then he sets out why Helen Rose's report is
 24 disclosable.
 25 If we go to page 3, second paragraph:
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1 happened. I think I saw a version of it at some point
 2 where it effectively went without the markings but,
 3 certainly, that wasn't --
 4 Q. Then, lastly on this topic, before the break, can we
 5 look at POL00108163, please --
 6 A. Yes.
 7 Q. -- an email from you to Martin Edwards. Can you help us
 8 with who he was?
 9 A. He was, at this time, I think, the Chief Executive's
 10 Chief of Staff.
 11 Q. Within Post Office?
 12 A. Within Post Office. I beg your pardon.
 13 Q. If we scroll down to point (iii), the briefing can
 14 address the issues we discussed yesterday, namely:
 15 "Whether the 'Helen Rose Report' is in the public
 16 domain (it's not) ..."
 17 Then:
 18 "I think it is sensible to keep references to the
 19 Helen Rose Report to a minimum ..."
 20 In what context were you advising the Chief of Staff
 21 to keep any references to the Helen Rose Report to
 22 a minimum?
 23 A. I think, in this, you need to get -- this is a document
 24 where the full trail, I think, is important in the
 25 context of what's happening. I think I'd been asked --
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1 "... I am in no doubt that this document is
 2 disclosable ... if the matter were to come before
 3 a *criminal* court the judge would without hesitation
 4 order the disclosure in the appropriate case."
 5 Then I think you gave your instructions on page 1:
 6 "Please disclose all information from the report
 7 that needs to be disclosed.
 8 "... do so in the form of a new, standalone document
 9 (Helen presented the info in the form she did so as to
 10 provide it to the Legal Department for its view)."
 11 Why did you want a new, standalone document?
 12 A. I think it just separated that -- I think I said it
 13 earlier. It just removed any question about what had
 14 been prepared for. I had been told, I think by
 15 Cartwright King, that you can give disclosure in the
 16 form of disclosure notes, as opposed to the document
 17 itself, and I had thought, look, they know what needs to
 18 be disclosed from there, which is the key of it, you
 19 disclose what needs to be disclosed, do it in a way that
 20 sort of removes the question around this.
 21 Q. Would that not have had the effect of obscuring the
 22 context in which the report had been originally
 23 generated?
 24 A. Not necessarily. It could have been as simple as
 25 removing the privileged piece, which I think is what
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1 if we go -- can I have the tab reference, please?
 2 Q. We'll give you the tab number. B84.
 3 A. Sorry, that's 184. If we go all the way through to --
 4 Q. Pages 4 and 5.
 5 A. Yes, thank you.
 6 Q. If we look at the foot of page 4 and on to page 5,
 7 Mr Edwards sends you some text for a report to the CEO
 8 on criminal cases.
 9 A. Yes.
 10 Q. The text is:
 11 "Our criminal barrister, Brian Altman QC, has
 12 completed his review of the approach we are taking to
 13 reviewing cases that have been subject to prosecution,
 14 in particular looking at whether we are complying with
 15 our duty to disclose the findings of the Second Sight
 16 Report to the defence teams ... His conclusion is that
 17 our approach is 'fundamentally sound', providing us with
 18 strong grounds to resist any formal review of our
 19 prosecutions (for example by the [CCRC]). To date,
 20 following several sifts our external firm of solicitors
 21 has identified 11 cases where disclosure is required.
 22 It is a matter for the defence to determine what action
 23 they might take ..."
 24 Then scroll up.
 25 A. So, to put that in context, to the best of my
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1 recollection is that the -- and I think it's in the --
 2 it's in the heading, it's the CEO report. So a report
 3 was prepared for the Chief Executive. I don't know to
 4 whom, I assume it's the Board. It would be collected
 5 from various parts of the business on matters that had
 6 been -- were of interest to the Board, I don't know what
 7 the criteria for that were, and then they would ask
 8 whoever was around to give either approval, sign off the
 9 writing.

10 So I don't know where the draft started from on that
 11 but he was saying "Here's an extract from the CEO
 12 report -- which you can see is relatively small, sort of
 13 very high level -- what do you think?" That's what
 14 I was asked to do.

15 So I then -- in the next one, I made some suggested
 16 amendments.

17 **Q.** In the amended text we're looking at on the screen, you
 18 added in the words that are emboldened and underlined?

19 **A.** Yes. That's right, and I think -- did I strike any out?
 20 It doesn't look like it. Well, I think I replaced some
 21 words where it felt like we might be overreaching.

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

23 **A.** It's at that point -- my understanding was the documents
 24 being considered for -- through the Sift Review for
 25 disclosure and past prosecutions was not just the Second
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1 a minimum?

2 **A.** Well, to a minimum? Because -- I say this later on --
 3 well, it generated a lot of activity about what it was
 4 and what it involved, and I offered to go through it --

5 **Q.** Why did it generate activity about what it was and what
 6 it involved?

7 **A.** Well, we can see here Martin says:

8 "Thanks ... Unfortunately I think I probably do need
 9 to give Paula more information on this [this is on
 10 page 2], as this is going to raise all sorts of
 11 questions from her and the Board! Please could you send
 12 me the report and any associated advice ..."

13 **Q.** Yes.

14 **A.** So then I go:

15 "Can we take some time to discuss?"

16 **Q.** Yes.

17 **A.** We agree, it's a quick -- Martin says:

18 "... it's probably better not to mention [the
 19 report] specifically, as it will ... serve to confuse
 20 things ..."

21 **Q.** Why would the mention of the report confuse things?

22 **A.** I don't know. That's a -- I don't know.

23 **Q.** Then we get to page 1 --

24 **A.** Yes.

25 **Q.** -- where you say:

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1 Sight Report, but also the Helen Rose Report, and so
 2 I introduced it in at this point saying, "Well, hang on,
 3 it's not just that document; there are two of them".

4 **Q.** Mr Edwards asked you, at the foot of page 3:

5 "Is the Helen Rose Report a key part of the
 6 disclosure? If so I think we'll need to include the
 7 reference to it in square brackets below."

8 So is that him adding the text in that we've just
 9 looked at?

10 **A.** Sorry, who is that? Is that -- I'm sorry, what am
 11 I looking for in the highlighted section?

12 **Q.** Mr Edwards replied:

13 "Is the Helen Rose Report a key part of the
 14 disclosure? If so I think we'll need to include the
 15 reference to it in square brackets below."

16 So it looks like he has added those words in, "and
 17 Helen Rose", in the text on page 4.

18 **A.** In the text on page 4 now?

19 **Q.** Yes. I don't want to spend too long on this --

20 **A.** Oh, yeah. No, I'm sorry --

21 **Q.** -- about the intricacies of drafting.

22 **A.** I beg your pardon. I think I'd added it in. It's not
 23 in the --

24 **Q.** My only question was: on page 1 of the email, why did
 25 you want to keep references of the Helen Rose Report to
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1 "I think it is sensible to keep references to the
 2 Helen Rose Report to a minimum ..."

3 My question is: why did you think it sensible to
 4 keep references to the Helen Rose Report to a minimum?

5 **A.** So it was -- so the way I'd read this, it was a question
 6 about what's being disclosed. The Helen Rose Report was
 7 something that was being disclosed and, in the briefing
 8 note we'd received -- which I think must have been from
 9 Cartwright King, I attach a briefing note -- it says,
 10 "It's unlikely to require disclosure in any further
 11 cases". So in a short summary of matters in a larger
 12 report on other things, as I understood it, it was
 13 something that didn't appear to be a live issue going
 14 forward.

15 **Q.** Live issue for who?

16 **A.** For disclosure, and then -- so it wasn't going to be
 17 something that was continuing to be disclosed. Actions
 18 weren't going to be continued to be taken with respect
 19 to it, I think. And then I also added in that we --
 20 Brian's view was that it added very little.

21 So I'm sitting here thinking I don't know if it's --
 22 it doesn't seem, to me, to be particularly relevant
 23 going forward.

24 **MR BEER:** Thank you.

25 Those are the only questions I ask today.

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1 Sir, can we start at 9.45 am tomorrow? I'll pick up
 2 questioning with the shredding advice.
 3 **SIR WYN WILLIAMS:** Yes. Tomorrow, Mr Beer, we embark on
 4 a new form of procedure, do we not, in that the
 5 representatives of Core Participants will be given
 6 a 45-minute time slot, and I think three have claimed
 7 it, to ask questions of Mr Williams?
 8 **MR BEER:** That's right, sir.
 9 **SIR WYN WILLIAMS:** I'm just telling everyone now that, in my
 10 view, this will only work if people are scrupulous about
 11 using the time because the last thing we want is for the
 12 third person of the Core Participants tomorrow afternoon
 13 being truncated because the two before him (or her) have
 14 overrun.
 15 So it's 45 minutes each, and I propose to be
 16 ruthless about it, just for everybody to know.
 17 Mr Williams, overnight, I dare say you'll want to
 18 relax, if you can, but you won't want to talk to anybody
 19 about your evidence, I'm sure, and I know you understand
 20 that you shouldn't.
 21 **THE WITNESS:** I do, sir.
 22 **SIR WYN WILLIAMS:** So with that, I'll see you all tomorrow.
 23 **THE WITNESS:** Thank you, sir.
 24 **MR BEER:** Thank you, sir.
 25 **(4.34 pm)**

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1 **(The hearing adjourned until 9.45 am the following day)**
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