

Friday, 19 April 2024

(9.45 am)

RODRIC DAVID ALUN WILLIAMS (continued)

Questioning by MR BEER (continued)

MR BEER: Good morning, sir. Can you see and hear us?

SIR WYN WILLIAMS: Yes, thank you very much.

MR BEER: Yesterday, I asked about an exchange of emails involving Mr Williams on 19 October 2019, the reference was POL00043169 -- no need to display at the moment. This was about the 14,000 KELs that hadn't been disclosed before the Horizon Issues Trial or during the Horizon Issues Trial, and then the Post Office's proposed approach in relation to those 14,000 KELs after they had been discovered.

You asked Mr Williams questions, sir, centring on the distinction, essentially, between disclosure and inspection and Mr Williams said -- again, I'm summarising -- that there ought to exist correspondence that showed that the existence of the 14,000 KELs had been revealed to the claimants' solicitors Freeths and that an index of such KELs had been sent to Freeths.

I'm very grateful to the Post Office and its lawyers who overnight have produced some additional correspondence to the Inquiry. I'm not going to ask for the documents, that I'm about to give the reference

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you'll see that it was written by Andy Cash. I think you'll remember he was a member of Cartwright King --

A. Correct.

Q. -- and it's a letter to Hugh Flemington and Susan Crichton. It says:

"I enclose for your urgent attention an advice prepared by my colleague Simon Clarke. I am sure you will appreciate the advice is sent as part of our brief to advise on the impact of Horizon issues and to protect the reputation of [Post Office Limited]. It is fully accepted you may wish to take a second opinion on the views expressed."

Just on that line, was it part of Cartwright King's brief to protect the reputation of the Post Office?

A. I don't know.

Q. Did you ever give any instructions to Cartwright King, firstly, at all?

A. Typically not, but I think that we saw yesterday I gave an email which I think you could say was an instruction to make disclosure and I probably did say things along those lines, but a formal instruction along that line, I don't believe I did that.

Q. Would you say it was part of Cartwright King's brief to protect the reputation of the Post Office?

A. I don't know. I didn't work with them closely enough on

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numbers to, to be displayed. They can be considered by you and the Core Participants in due course.

There are six references: they are POL00285691, that's a Womble Bond Dickinson letter to Freeths of 3 October 2019; POL00043107, Freeths to Womble Bond Dickinson of 11 October 2019; POL00424141, Womble Bond Dickinson to Freeths of 15 October 2019; POL00424142, Womble Bond Dickinson to Freeths of 24 October 2019; POL00287839, Womble Bond Dickinson to Freeths of 28 October 2019; and POL00043187, Womble Bond Dickinson to Freeths of 1 November 2019.

Amongst that run of six letters, in due course, you'll find that it was the Womble Bond Dickinson letter of 3 October 2019 to Freeths in which the existence of the 14,000 KELs was first disclosed and that it was Womble Bond Dickinson's letter of 28 October 2019 to Freeths, in which an index of the 14,000 KELs was attached.

SIR WYN WILLIAMS: Thank you very much, Mr Beer.

MR BEER: Thank you, sir.

So, can we, Mr Williams, pick up with where I left off last night, which was turning to the shredding advice. Can we look, please, to POL00006577.

Thank you. You should see this is a letter of 2 August 2013. If we just pan out for the moment,

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matters to know whether that was or wasn't; I'm sorry.

Q. In any event, the advice, if we turn it up, please, POL00006799, that's B/79. This is the advice to which reference was made. It's an advice entitled "Disclosure, the duty to record and retain material".

If we go to page 2, please, and look at paragraph 5. He has earlier referred to the series of hub conference calls and says:

"At some point [this is Mr Clarke speaking] following the conclusion of the third conference call [which he understands] to have taken place on the morning of ... 31 July, it became unclear as to whether and to what extent material was either being retained or centrally disseminated. The following information has been relayed to me:

"(i) The minutes of a previous conference call had been typed at emailed to a number of persons. An instruction [had been] given that those emails and minutes should be, and have been, destroyed: the word 'shredded' was conveyed to me."

Were you given a copy of this advice?

A. So the specific advice note from -- that we're looking at, the document?

Q. Yeah, the one we're looking at.

A. Yes, I was.

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1 Q. So you were given a copy of this advice?
 2 A. I saw it at the time, I'm sure I did, yes.
 3 Q. Sorry?
 4 A. I saw it at the time, yes. I'm sure I saw a copy, I was
 5 given a copy.
 6 Q. What did you think when you read paragraph 5(i)?
 7 A. It's an extremely serious allegation.
 8 Q. Presumably you were quite shocked to read it?
 9 A. Yes.
 10 Q. Because you would have been reading it, Mr Williams, in
 11 the context of having read the previous advice, the
 12 15 July advice, which was about an expert witness, who
 13 it was said had breached their duties to the court and
 14 that the Post Office had breached its duties to the
 15 court, and that, taken together, that may have an affect
 16 on the safety of criminal convictions. That would be
 17 the context in which you were reading this?
 18 A. Not necessarily. I don't know remember when I saw the
 19 15 July email and I --
 20 Q. It's an advice, not an email.
 21 A. I beg your pardon, advice. They certainly were arriving
 22 at the same time but I'm not sure whether I connected
 23 the two of them or not.
 24 Q. But they were about the same thing, weren't they? One
 25 was the witness that the Post Office has been using is

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1 dealing with Horizon, I'm not suggesting that, but
 2 I don't think they're quite as connected as --
 3 Q. As I'm making out?
 4 A. *(Unclear)*.
 5 Q. Is that right, you don't think they're as connected?
 6 A. I'm saying I don't know what I was thinking at the time.
 7 Q. Looking at it now, do you think there's a connection
 8 between the two: we get an advice saying the safety of
 9 convictions needs to be looked at, in part because
 10 an expert witness hasn't disclosed some bugs about which
 11 he knew. We need to set up a system that records across
 12 the business so that the information isn't siloed,
 13 a weekly conference call to bring that information
 14 together, and then an instruction is being given that
 15 the record of that conference call should be destroyed
 16 or shredded.
 17 A. So, again, I think there's a lot of conflation going
 18 on --
 19 Q. Thank you.
 20 A. -- and I'm struggling because I don't remember what my
 21 mindset was at the time, which is what I've been asked
 22 but you'd said one is about the safety of convictions.
 23 Now, I can't recall, and I'd need to re-read the advice
 24 note from 15 July in full, whether that followed from
 25 the advice on Jenkins, on 15 July, whether that led to

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1 tainted, we need to set up a system to bring together
 2 information about possible bugs or problems in Horizon.
 3 That's been done.

4 This is referring to that system, the hub, having
 5 been set up, and the reference being given is that the
 6 minutes of one of those meetings had been destroyed and
 7 the word "shredding" had been used. So the context --
 8 this isn't about a separate case, is it? This is about
 9 Horizon and its bugs and the expert witness.
 10 A. One is about expert witness and prosecutions and one is
 11 about a Post Office process going forward, that --
 12 Q. Two distinct things?
 13 A. No, but they're not as connected as -- they are both
 14 relating to the response to Horizon issues, but they
 15 are -- one is talking about a conduct of prosecutions,
 16 the first one, and the second one is talking about
 17 a Post Office internal management process.
 18 Q. Is that how you would have seen them, as divisible in
 19 that way? One is about just internal management
 20 processes and the other one is about, potentially, the
 21 safety of criminal convictions?
 22 A. I don't recall but -- I don't recall, it's 11 years,
 23 I think, since -- almost 11 years since this came out,
 24 I don't know what connections I was making them between
 25 them, I'm sorry. To be clear, I do accept they are both

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1 the review or that was -- it was just saying you can't
 2 use him in prosecutions going forward, and this, which
 3 is about a Post Office Management thing, which, in and
 4 of itself -- by the way, this in and of itself is
 5 serious enough.

6 I'm not sure I did or I'm not sure I didn't make the
 7 connection at the time but, in and of itself, this was
 8 serious enough to warrant action.
 9 Q. If we go on to page 6, please.
 10 A. Yes, I have it.
 11 Q. If we scroll down a little bit, in paragraph 12 he says:
 12 "... the only proper way forward is for the
 13 conference calls to be properly minuted, those minutes
 14 to be centrally retained and made available to all those
 15 who properly require access thereto. And were it to be
 16 determined that those telephone conferences were no
 17 longer to take place, the duty to record and retain
 18 nevertheless remains: individual investigators with
 19 knowledge are bound both by the duty to record and
 20 retain to inform the prosecutor -- [ie Post Office
 21 Limited]."
 22 Were you responsible in any way for carrying into
 23 fact that advice there?
 24 A. In terms of carrying out the minuting? Which -- sorry,
 25 what particular part of the --

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1 Q. Any part. Any or all parts, Mr Williams.
 2 A. I certainly helped Susan Crichton doing the -- I think
 3 the covering letter attaching the advice was sent to
 4 respond to the advice and to confirm that, you know, the
 5 conference calls would be properly minuted and retained,
 6 and made available. So, to that extent, yes, I was
 7 involved in it. In terms of the physical actions of
 8 that, I don't recall being charged with holding the pen
 9 on the minutes or ...
 10 Q. Can we look please at POL00006797, which is E/7.
 11 A. Okay, can I have the tab please?
 12 Q. E/7.
 13 A. E/7, thank you.
 14 Q. This is the reply by Ms Crichton. If we look at the
 15 bottom of the page, we can see it is signed off by her.
 16 A. Yes.
 17 Q. Look at the top of the page, we'll see it's 16 August
 18 2013 and it's her reply to the letter of 2 August, so 14
 19 days later:
 20 "Thank you for your letter of 2 August enclosing
 21 Simon Clarke's advice ... unfortunately I had not seen
 22 your letter and was not aware of it until Martin's
 23 [Martin Smith] email on 14 August."
 24 Do you know how that came about, that Ms Crichton
 25 hadn't seen the advice until 14 August?

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1 with the Horizon Calls, specifically any minutes of the
 2 calls. I note that Simon's advice does not suggest that
 3 material connected to the operation of Horizon itself
 4 may have been compromised."
 5 Then skipping a paragraph:
 6 "I can confirm that we will continue to hold the
 7 [conference] calls for the foreseeable future, and that
 8 minutes of those calls are and will continue to be
 9 taken. For administrative reasons, these minutes will
 10 be centrally stored with our solicitors Bond Dickinson,
 11 with access to those minutes being made available to
 12 your firm and those you engage as expert witnesses."
 13 I think if we look at POL00193605, which is B/67, we
 14 can see that, in the terms it was sent out, you drafted
 15 this letter.
 16 A. 67? I can only see parts of -- yes. I have it. Thank
 17 you.
 18 Q. Thank you. All right, that can come down.
 19 Who commissioned Mr Clarke's advice in relation to
 20 the destruction of minutes?
 21 A. From recollection, I think he did it of his own
 22 volition, he considered himself duty bound, I think, was
 23 the sort of feeling I've got, to raise it immediately.
 24 Q. Okay, so it wasn't an instruction; it was because he had
 25 become concerned about what he had been told, that he

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1 A. No.
 2 Q. Sorry?
 3 A. No.
 4 Q. We've got some evidence from Simon Clarke that he was
 5 subsequently told by Jarnail Singh that it had sat, the
 6 advice, in a drawer of yours, between 2 August and
 7 14 August; is that correct?
 8 A. Not to my knowledge. I don't recall that.
 9 Q. Were you responsible for drafting this letter?
 10 A. I think I was, yes.
 11 Q. Why were you responsible for drafting it?
 12 A. I think Susan, the General Counsel, asked me to assist
 13 her.
 14 Q. Anyway, so she says:
 15 "... unfortunately, I had not seen your letter and
 16 was not aware of it until 14 August. That advice was
 17 prepared as a consequence of statements purportedly made
 18 in connection with the weekly conference calls ...
 19 "A key purpose of the [conference] calls is to
 20 ensure that Horizon users are promptly made aware of any
 21 issues with it ..."
 22 Next paragraph:
 23 "I am therefore deeply concerned at the suggestion
 24 inside Simon's note that there may have been an attempt
 25 to destroy documentary material generated in connection

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1 sort of self-commissioned himself?
 2 A. Yeah, I can't speak for Simon but my impression is that
 3 that is what had motivated it.
 4 Q. What steps did you personally take to ensure that the
 5 allegations recorded in Mr Clarke's advice were fully
 6 investigated?
 7 A. I don't know what you mean by "fully investigated" but
 8 I --
 9 Q. Hold on, stop there. You don't know what I mean by
 10 fully investigated? What do you not understand about
 11 that sentence?
 12 A. Well, investigations can be broad, wide, long, deep.
 13 Q. Okay, what steps did you take to ensure that it was
 14 investigated in any way whatsoever?
 15 A. I don't know but the -- I felt able to draft a response,
 16 which I'd like to think was done with the benefit of
 17 some insight into what had happened and transpired,
 18 but --
 19 Q. That doesn't say anything about what has happened. It
 20 says what's going to happen.
 21 A. Look, I don't recall. I'm sorry, I don't recall.
 22 Q. Is the answer none?
 23 A. No, I don't recall. No, the answer is I don't recall.
 24 Q. Do you think you ought to have taken some steps to
 25 ensure that the allegations made in Mr Clarke's advice

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1 were investigated in any way whatsoever?

2 **A.** I don't necessarily know that I would have at that time,

3 that -- I don't know. That was something I was doing,

4 I was asked to assist in a response, which I helped

5 draft.

6 **Q.** That's not an answer to the question. Do you think you

7 should have ensured that there was some investigation?

8 **A.** I can't remember what happened at that time 11 years

9 ago. So what I felt needed to be done or shouldn't be

10 done, I can't recall now.

11 **Q.** Well, looking back now, do you think there should have

12 been some investigation into what Mr Clarke had said --

13 **A.** I'd like to think we responded to it prudently at the

14 time in the manner we did. So I'm not sure, looking at

15 it now, it --

16 **Q.** -- to find out who it was who had allegedly given

17 an instruction for minutes to be destroyed, asked them

18 about it, find out why they had given the instruction,

19 find out whether minutes had been destroyed, find out

20 whether any other documents had been destroyed on the

21 orders of that person, or otherwise?

22 **A.** From recollection I think we found out that minutes had

23 not been destroyed.

24 **Q.** Okay, so there was an investigation?

25 **A.** There must have been something for that but I don't know

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1 Simon Clarke Advice of 2 August?

2 **A.** Yes.

3 **Q.** Did your responsibility go wider than drafting a letter

4 for Susan Crichton?

5 **A.** I don't recall that, no.

6 **Q.** Who was responsible for investigating the matters raised

7 in Mr Clarke's advice?

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

9 **Q.** Was consideration given to reporting this matter to the

10 police?

11 **A.** I don't believe so no.

12 **Q.** Did you find out that the allegation recorded in

13 Mr Clarke's advice was attributed to Mr John Scott, the

14 then Head of Security, it was he that was said to have

15 given the instruction?

16 **A.** I think I knew that John Scott was Head of Security at

17 the time.

18 **Q.** That's a different question. That was an answer to

19 a different question.

20 **A.** Sorry.

21 **Q.** That question would be "Did you know that John Scott was

22 Head of Security?" The question I asked is: did you

23 know that the allegation recorded in Mr Clarke's advice

24 was said to relate to an instruction given by Mr Scott?

25 **A.** No, I did not know that, not at that level of detail,

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1 when I recall knowing that piece or if, in fact, that is

2 correct, I'm -- I genuinely cannot remember what

3 happened in and around this time, in terms of the steps

4 taken that led to the production of this letter.

5 **SIR WYN WILLIAMS:** About ten minutes ago, Mr Williams, you

6 told me that this allegation was, in effect, serious or

7 very serious; I forget whether you said very or not, but

8 was a serious matter. I think it's fair for Mr Beer to

9 press you on whether you now think that serious matters

10 of that kind should have been investigated.

11 **A.** Okay, thank you, sir, and my apologies if I've been

12 unhelpful. It's not my intent.

13 **MR BEER:** So what's the answer to the question?

14 **A.** If I could have the question again, I will seek to

15 answer it.

16 **Q.** Should the serious or very serious matters raised in

17 Mr Clarke's advice have been investigated by the Post

18 Office?

19 **A.** Yes.

20 **Q.** To your knowledge, were they?

21 **A.** I do not know.

22 **Q.** You had responsibility, we've seen, for drafting the

23 letter of response?

24 **A.** Yes.

25 **Q.** Were you, therefore, involved in the response to the

14

1 no, not the identity, no. I don't believe I did.

2 **Q.** Would you have been concerned if you found out that it

3 was said to be the Head of Security that had given

4 an instruction to shred documents?

5 **A.** Yes.

6 **Q.** Because he was for the person in charge of the

7 department responsible for investigating allegations of

8 criminal offences against subpostmasters and bringing

9 proceedings against them?

10 **A.** Yes.

11 **Q.** To your knowledge, was the information here disclosed to

12 any convicted defendants?

13 **A.** I don't believe -- at the time, I don't know, is the

14 answer, but it didn't form part of disclosure review

15 along the lines -- to my knowledge it didn't form part

16 of a disclosure review along the lines that we had done

17 for the bugs, the Second Sight Report.

18 **Q.** So, to your knowledge, was this escalated, the

19 information in Mr Clarke's advice, to the Post Office

20 Board?

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

22 **Q.** Should it have been?

23 **A.** I don't know what the higher governance was.

24 **Q.** Can we turn to a different topic, please. POL00006583.

25 This is Mr Altman KC's interim review. This is also

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1 dated, I think, 2 August 2013, and it's his interim
 2 review of Cartwright King's current process and, in
 3 summary -- I should say this is B/75 for you because
 4 I know you want to --
 5 **A.** Thank you.
 6 **Q.** -- look at all those documents in those small files.
 7 **A.** I have it. Thank you.
 8 **Q.** Do you recall Mr Altman's interim review?
 9 **A.** No, not the interim review.
 10 **Q.** Were you responsible for commissioning it?
 11 **A.** No, I don't believe I was.
 12 **Q.** Did you see it at the time?
 13 **A.** I think I will have, yes.
 14 **Q.** Do you remember that he caveatted the review that he
 15 conducted in a number of ways? If you look at
 16 paragraph 3, if we scroll down and then look at
 17 paragraph 4, then go over the page, please. Then look
 18 at paragraph 7. Paragraph 7 in particular:
 19 "... the sole focus of possible complaint is the ...
 20 system ... and the single expert witness, Gareth Jenkins
 21 ..."
 22 Then paragraph 8, he sets out an assumption. Then
 23 over the page, if we go down to 11, over the page --
 24 thank you. He says that he wonders, in paragraph 11:
 25 "... whether non-disclosure by [Gareth Jenkins] of

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1 **A.** Yes, I do.
 2 **Q.** Who was responsible for making decisions as to whether
 3 the review should be broadened or not?
 4 **A.** Well, on this, I think in terms of the review, the sort
 5 of process was, as I understand now, having looked at
 6 the, you know, some of the documents around it, is the
 7 scope was discussed, I think, with Womble Bond
 8 Dickinson, and then provided to -- sorry, I guess from
 9 Post Office, be coming from General Counsel from the
 10 Post Office Legal team, working with Womble Bond
 11 Dickinson to Brian Altman, and Brian then provided these
 12 initial comments and then -- before the response was
 13 sort of finalised and agreed, which he would ultimately
 14 review. Does that help?
 15 **Q.** Maybe if we look at some documents, that will assist.
 16 Can we look at POL00298123. If we scroll down, please.
 17 Sorry, this is E/123 for you to follow up. Are you at
 18 E/123?
 19 **A.** Sorry, I am. I beg your pardon.
 20 **Q.** Can we look at the bottom of page 1, please. We'll see
 21 an email from Gavin Matthews, who was a partner at Bond
 22 Dickinson, yes?
 23 **A.** Yes.
 24 **Q.** He's writing to you, amongst others, and he said:
 25 "I have now had the chance to review Brian Altman's

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1 aspects of the Horizon system is the only potential
 2 issue that arises in [the case], or whether there may be
 3 other issues, which need to fall within the remit of the
 4 review."
 5 In 12, he questions:
 6 "... whether the sole issue of non-disclosure is too
 7 restrictive an approach to take ..."
 8 When you read this, did you appreciate those caveats
 9 that he was including in his interim review?
 10 **A.** I think some of them, maybe, but not all of them. The
 11 general caveat that I remember is that he'd be working
 12 on the information that we would be giving him. He'd
 13 be --
 14 **Q.** Were you responsible, looking at paragraphs 11 and 12,
 15 for making decisions or contributing to decisions in the
 16 light of what is said there, as to the nature of the
 17 review that Cartwright King was to carry out?
 18 **A.** I don't believe I was, no.
 19 **Q.** Whose responsibility was that?
 20 **A.** I don't know. I'm --
 21 **Q.** You see what he's saying here.
 22 **A.** Yes.
 23 **Q.** He's raising questions of whether the review that
 24 Cartwright King is carrying out is narrow or too
 25 restricted or limited in nature?

18

1 Interim Review of [Cartwright King's] Current Process
 2 ..."
 3 Just to stop and understand what's happening,
 4 Cartwright King were conducting a review of some cases.
 5 Mr Altman had conducted a review of their review, and
 6 now Bond Dickinson were conducting a review of Brian
 7 Altman's review of Cartwright King's review; is that
 8 what's happening?
 9 **A.** There's certainly a lot of reviewing going on, yes, but
 10 I think it's more that Cartwright King was proposing
 11 a course of action in response to prosecutions, as
 12 a consequence of the Second Sight advice. Post Office
 13 was wanting a second opinion on whether that was the
 14 prudent thing, it was the right thing to do and then, so
 15 Brian was instructed to look at that --
 16 **Q.** So he was reviewing their proposed review?
 17 **A.** Yes, yeah, and at an early stage because, obviously, if
 18 the review was inadequate and needed to be done -- it's
 19 better to do it once than several times, so that if
 20 there were errors, mistakes, whatever it is, they could
 21 be picked up at an early stage and not all done in one
 22 go rather than in several. That's my understanding of
 23 the sort of review process.
 24 Cartwright King were doing it, we asked Brian to
 25 sort of take a look at that to see if it was --

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1 basically to provide some assurance over the process,
 2 so --
 3 **Q.** So that was Mr Altman's part of the process, or Brian,
 4 as you know him?
 5 **A.** Yes. I beg your pardon, Mr Altman. But yes.
 6 **Q.** Then what was this -- what were Bond Dickinson adding?
 7 **A.** They were the conduit. I think they were the formal
 8 instructing solicitors to Mr Altman in this, and so they
 9 were providing their input on the way through.
 10 **Q.** Let's just look at what they say:
 11 "I have now had the chance to review Brian Altman's
 12 interim review ..."
 13 Then under 1:
 14 "It is clearly good news that the current limited
 15 process [Cartwright King] have adopted is broadly fine.
 16 "2. He [I think that's Mr Altman] raises the issue
 17 of whether the current review is too narrow [and he
 18 cross-references those two paragraphs, 11 and 12 that
 19 I have referred you to] -- he references the list of
 20 issues in the [Second Sight] Report and Spot Review 22
 21 as examples of other issues which may need to fall
 22 within the ambit of [Cartwright King's] review. Whilst
 23 this should be put to [Cartwright King], my own view is
 24 that it may be very difficult for [Cartwright King] to
 25 expand the review on issues on which [Second Sight] have
 21

1 responding to this advice about Mr Altman's review of
 2 the review?
 3 **A.** I would think it was the General Counsel.
 4 **Q.** So that would have been Ms Crichton at the time?
 5 **A.** Yes.
 6 **Q.** Do you recall what decision she made in relation to the
 7 issues raised?
 8 **A.** I don't, I'm sorry, no.
 9 **Q.** Were you party to discussions over what decisions should
 10 be made as to, for example, the geographical scope of
 11 the review, the temporal scope of the review, should it
 12 only go back to 1 January 2010?
 13 **A.** I don't recall being party to those discussions.
 14 **Q.** I think you did attend a conference with Brian Altman KC
 15 on 9 September 2013; is that right?
 16 **A.** Yes, I did.
 17 **Q.** You tell us about this, that can come down, in
 18 paragraph 85 of your statement, which is on page 43.
 19 **A.** Thank you, I have it.
 20 **Q.** We asked you to comment on two notes of a conference
 21 with Mr Altman on 9 September 2013. You say that,
 22 although you recall attending his chambers on several
 23 occasions, you don't have any recollection of that
 24 conference specifically. You are likely to have
 25 attended to make sure the actions being taken were
 23

1 failed to come to any conclusion.
 2 "3. The possible conflict issue is well made and
 3 [Cartwright King] need to be alive to it."
 4 That's part of the advice I haven't taken you to
 5 which is whether Cartwright King lawyers reviewing cases
 6 in which Cartwright King has been the prosecutor is
 7 appropriate, broadly summarised.
 8 Then geographical and temporal limits, only going
 9 back to 1 January 2010 and only looking at England and
 10 Wales, need to be reviewed and answered.
 11 He says:
 12 "Our advice [that's Bond Dickinson's advice] is:
 13 "[Post Office] Legal needs to disclose Brian
 14 Altman's interim review to [Cartwright King] and discuss
 15 it with them."
 16 Was that done?
 17 **A.** I believe so. I've got that from documents, rather.
 18 **Q.** "[Cartwright King] should be asked to respond in writing
 19 to the recommendations made [that's towards the end of
 20 Mr Altman's advice].
 21 "Bond Dickinson ... should sit down with Brian
 22 Altman to walk him through the Spot Reviews and the
 23 [Second Sight] Report so he can understand the impact of
 24 his review on the civil side."
 25 Who was the relevant decision maker here in
 22

1 joined up within the Post Office and that you could take
 2 forward any that might apply to you. You've no reason
 3 to think that each of the sets of conference notes fails
 4 to reflect what happened or omits matters that were
 5 material. You can't add anything, yes?
 6 **A.** Um --
 7 **Q.** Can we just look at those notes of the conference.
 8 POL00139866. That's B/81 for you.
 9 **A.** Thank you.
 10 **Q.** Now, I think this is the note of the conference,
 11 a typed-up note, made by Martin Smith of Cartwright
 12 King. So one of the two notes of the conference. If
 13 you just scroll down, please, so you can refamiliarise
 14 yourself with the note. It's a long and detailed note,
 15 yes?
 16 **A.** Yes.
 17 **Q.** I mean, it spreads, in its typed version, over 11 pages.
 18 In the course of the note, there's discussion in
 19 relation to Mr Jenkins. Can you recall whether there
 20 was any information passed to Mr Altman that the Post
 21 Office either knew or thought it likely that it hadn't
 22 instructed Mr Jenkins properly as to the duties of
 23 an expert witness? There's no record of that in either
 24 this note or the other note.
 25 **A.** Can you take me to the part of the note where it refers
 24

1 to Mr Jenkins?

2 **Q.** Well, it's spread across the note. People come back to
3 it on a number of occasions.

4 **A.** Sorry, could I have the question again?

5 **Q.** Yes. For example, if you look at page 4, and if we
6 scroll down, please, it seems that, just under where the
7 conference is discussing the bandwagon effect:
8 "Presumably number of subpostmasters trying to see
9 how they can organise their defence. You get fashions.
10 So have to be robust and not too free.
11 "So long as adopt test can't go far wrong."
12 Then:
13 "Simon [I think that's Mr Clarke]: Goes back to
14 [I think that's Gareth Jenkins]. Either he was not
15 aware of [information] or [Fujitsu] ivory tower -- not
16 being taken seriously."
17 That's one of the occasions when there was
18 a reference to Mr Jenkins.

19 **A.** Mm, thank you.

20 **Q.** We saw in your handwritten note of yesterday that there
21 was at least some recollection or recognition that it
22 may be the case that the Post Office had not instructed
23 Mr Jenkins properly. Was that passed on to Mr Altman?

24 **A.** I don't recall whether it was or wasn't but I certainly
25 have no positive recollection of that.

25

1 POL00006485. This is the Bond Dickinson note of the
2 same conference. It's B/80.

3 **A.** Thank you. I have it.

4 **Q.** If we look at page 3, please, and the first paragraph:
5 "In relation to the cut-off date, 1 January 2010 was
6 close to the Horizon Online rollout. Prior to Horizon
7 Online rollout there was a cash audit done so that all
8 [Post Office] branches balanced. [Mr Altman] advised
9 that there was no positive duty to seek out individuals
10 [before] 1 [April] 2010 but if [the Post Office] was
11 approached it would need to make case-specific decisions
12 on disclosure."
13 Can you recall that being the material consideration
14 on the temporal scope of Cartwright King's review,
15 ie there had been a balancing exercise undertaken,
16 a cash audit undertaken?

17 **A.** That was -- yes, that is my understanding.

18 **Q.** Can you explain, please, why that was considered as
19 important in not giving disclosure to convicted
20 defendants where they had been convicted before
21 1 January 2010 or the conducted alleged against them had
22 occurred before 1 January 2010?

23 **A.** No, I can't comment on that. That was a matter for the
24 criminal lawyers.

25 **Q.** Was there any discussion on how that worked, though,

27

1 **Q.** Can you recall whether there was any discussion about
2 the Post Office's role as a prosecutor in obtaining and
3 then disclosing the evidence of Mr Jenkins in
4 prosecutions? So, rather than focusing on him as a man
5 and what he had not done or had failed to do, whether
6 the Post Office's role as prosecutor was addressed?

7 **A.** I don't recall -- I'm sorry, I've lost the question.
8 I'm -- I've lost the question. I'm sorry.

9 **Q.** You're writing it down as you go along. If you want me
10 to go slower so you can write the question down
11 verbatim, I'm happy to do that.

12 **A.** I'm sorry. I recall conferences with Mr Altman about
13 Post Office's role as a prosecutor, as in would we
14 continue to do it going forward or not but I'm just
15 trying to follow the piece around -- I don't quite
16 understand the connection between Post Office as
17 a prosecutor and Mr Jenkins. That's what I'm trying to
18 understand, sorry.

19 **Q.** Was there any discussion, to your recollection, of the
20 Post Office's role as a prosecutor, ie the duties that
21 it owed when calling evidence that may be expert
22 evidence?

23 **A.** Sorry. Thank you for clarifying that. No, I don't
24 recall that.

25 **Q.** Can we look, please, at the alternative note.

26

1 that the books were balanced, there was a cash audit
2 done, when Horizon Online went live, therefore, we don't
3 need to look backwards before then? Can you explain
4 your understanding of the logic of that?

5 **A.** No, I can't. All I can understand is that I -- well --
6 and I think, even then, it's an imperfect understanding
7 of the cash reconciliations that took place in the
8 branches when Horizon Online was introduced.

9 **Q.** So there was a cash reconciliation when they moved from
10 Legacy Horizon to Horizon Online?

11 **A.** Yes, that's my understanding.

12 **Q.** There was a moment frozen in time when the books ought
13 to have balanced or something ought to have been said
14 about it?

15 **A.** Yes, correct. That's my understanding.

16 **Q.** But why was that a reason to not look at the hundreds of
17 people that had been convicted in the decade before
18 1 January 2010?

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

20 **Q.** Was there any discussion about that, "because the books
21 should have balanced, or something should have been done
22 about it, in January 2010, we don't need to look at the
23 hundreds of convictions that have been obtained before
24 January 2010"?

25 **A.** As I say, I don't recall the full details of the

28

1 discussions then but I think that point -- I think Simon
 2 Clarke may have dealt with it in one of his advice
 3 notes, there's a little bit more text around it but
 4 I don't recall that -- I don't recall recalling that at
 5 the time or being aware that -- and I don't recall
 6 a discussion around that in this consultation.
 7 **Q.** Just going back to page 2 of the note, please.
 8 Thank you, at the last paragraph we see on the page,
 9 Mr Altman is recorded as advising that the Post Office
 10 and Cartwright King should:
 11 "... ensure that the disclosure procedure is beyond
 12 reproach. It was widely agreed that there was likely to
 13 be a 'bandwagon' approach in relation to defendants
 14 challenging their previous convictions."
 15 Can you remember who made the "bandwagon" comment?
 16 **A.** No, I can't, I'm sorry.
 17 **Q.** It's recorded that it was widely agreed, presumably
 18 that's widely agreed amongst the people that were
 19 present?
 20 **A.** Yes, I assume so, yes.
 21 **Q.** You were obviously one of those. Why did you agree that
 22 there was likely to be a bandwagon approach?
 23 **A.** Sitting here today, and quite possibly at the time, if
 24 something gains currency, people will gather around
 25 behind it. That seemed logical to me.

1 **Q.** In the fourth line, you say:
 2 "I [understand] that the aim was for Deloitte to
 3 provide an objective report into the reliability of
 4 Horizon ..."
 5 Yes?
 6 **A.** Yes.
 7 **Q.** That was your aim, was it: to get Deloitte to produce
 8 an objective report?
 9 **A.** The aim was certainly for Deloitte to come in
 10 objectively, yes, and then produce a report. So, yes,
 11 is the answer, sorry.
 12 **Q.** Can we look, please, at POL00125744. That's E/72. We
 13 can see that this is an initial step that you took on
 14 2 April 2014 to instruct Deloitte, yes?
 15 **A.** Yes.
 16 **Q.** It's addressed to Gareth James of Deloitte, and you say:
 17 "As discussed earlier today, Post Office is
 18 responding to allegations that the 'Horizon' IT system
 19 ... is defective and/or the processes associated with it
 20 are inadequate.
 21 "In order to respond to these allegations (which
 22 have been, and will in all likelihood continue to be,
 23 advanced in the courts), Post Office wants to
 24 demonstrate that the Horizon system is robust, fit for
 25 purpose and/or operates within an appropriate control

1 **Q.** So improperly jump up on something that was passing in
 2 front of them?
 3 **A.** I don't know about the improper, the hopping on, but
 4 certainly getting behind it, yes.
 5 **Q.** So maybe legitimately --
 6 **A.** Yes.
 7 **Q.** -- appealing their conviction --
 8 **A.** Yes.
 9 **Q.** -- or seeking to?
 10 **A.** Yes.
 11 **Q.** Is that the sense in which the bandwagon was used?
 12 People might legitimately here seek to appeal against
 13 their convictions? Is that the bandwagon that was being
 14 spoken about?
 15 **A.** I don't recall there being a distinction between
 16 legitimate and illegitimate bandwagoning, if that's
 17 an expression.
 18 **Q.** Thank you, Mr Williams. That can come down.
 19 Can we turn to a separate topic, please, remote
 20 access and turn up paragraph 105 of your witness
 21 statement, please, which is on page 53.
 22 **A.** Thank you. I have it.
 23 **Q.** Under the heading "My involvement with the instruction
 24 of Deloitte", if you just read that to yourself.
 25 **A.** Yes.

1 framework."
 2 That doesn't particularly suggest that the Post
 3 Office was looking for objective findings, does it?
 4 **A.** I think it demonstrates what Post Office wants to do,
 5 but we're instructing Deloitte to come to their own
 6 opinion.
 7 **Q.** Why were you setting out the outcome that the Post
 8 Office wanted, if you wanted an objective report?
 9 **A.** I think it's just the language I used at the time.
 10 **Q.** Well, I know that. It's on the page. But I'm asking
 11 you why.
 12 **A.** I don't know, I was trying to instruct Deloitte to act
 13 independently. I might have said "would like" or "would
 14 hope" or "need", or I could have used number of words.
 15 I think Post Office did want to demonstrate that it was
 16 robust because we were using it.
 17 **Q.** Why did you set out the conclusion you wanted them to
 18 reach?
 19 **A.** I didn't ask them to reach that conclusion --
 20 **Q.** Why did you set out the conclusion that the Post Office
 21 wanted?
 22 **A.** I'm sorry?
 23 **Q.** Why did you set out the conclusion that the Post Office
 24 wanted?
 25 **A.** I -- I'm sorry, I don't think -- I'm saying that's what

1 we want to demonstrate, that --

2 **Q.** Yes. Why did you do that?

3 **A.** I don't want to be flippant but -- so I won't be.

4 Sorry, that's not right. There are many things people

5 want but they don't always -- they don't always get

6 them.

7 **Q.** Is that your best answer?

8 **A.** Yes, I'll --

9 **Q.** I'll move on, then.

10 **A.** I certainly wasn't trying to steer a direction in

11 a first email.

12 **Q.** Can I look at some statements.

13 Sorry, before we look at some statements on what the

14 Post Office was told about remote access, and

15 information given to the Post Office about remote

16 access, having been directly involved in the instruction

17 of Deloitte, you would naturally be very interested,

18 wouldn't you, when they produced their report, as to the

19 conclusions which they reached?

20 **A.** Yes.

21 **Q.** You would have read it assiduously, wouldn't you?

22 **A.** I read it as well as I could when I received it. But

23 yes, the content was of interest, yes.

24 **Q.** It's not a piece of work commissioned by someone else in

25 the business that happens to pass across your desk, with

33

1 Winn/Lusher email from 2008:

2 "As far as I can tell, I first saw the 2008 internal

3 [Post Office] email [that's the Winn/Lusher email] when

4 I was sent it on 14 April 2014 in the context of

5 a scheme claim. The email [the Winn/Lusher email]

6 raised the issue of remote access (albeit in a different

7 manner from the way remote access was raised by Michael

8 Rudkin ...). I discussed this with Andy Parsons, who

9 drew out for me the questions it raised for [the Post

10 Office] but which Fujitsu would need to answer. These

11 questions were then sent to Fujitsu, whose responses

12 were provided to me on 17 April and I believe it was

13 relayed to Second Sight. I believe the question of how,

14 and to what extent, Fujitsu had the ability to alter

15 Post Office branch data remotely continued to be

16 explored with Fujitsu ..."

17 Dealing with this issue of the 17 April email, can

18 we look at that, please. POL00304478, that's B/100.

19 **A.** Thank you.

20 **Q.** If we turn up, please, pages 4 and 5.

21 **A.** I have them.

22 **Q.** So, essentially, what happens is that Second Sight, in

23 the context of their Mediation Scheme, had raised some

24 questions about remote access, yes, and you were putting

25 these to Fujitsu?

35

1 you being a copyee amongst many others, to emails?

2 **A.** No, I was not, no.

3 **Q.** You were the point man, again, for the instruction of

4 Deloitte's?

5 **A.** Yes, yes.

6 **Q.** Therefore, when they produced the report and it comes

7 back directly to you, you'd be interested in what they

8 wrote, wouldn't you?

9 **A.** Yes.

10 **Q.** Thank you. That can come down. Thank you.

11 Can we look, please, at some information that was

12 given to the Post Office about remote access and, first

13 off, look at paragraph 101 of your witness statement,

14 please.

15 **A.** I'm sorry, which paragraph?

16 **Q.** 101 --

17 **A.** Thank you.

18 **Q.** -- which is on page 50. You're here dealing with the

19 issue of remote access as it arose in the context of the

20 Mediation Scheme, yes?

21 **A.** Yes.

22 **Q.** The Inquiry has asked me to comment on an email sent to

23 [Mr] Parsons [in] April 2014 concerning an internal

24 [Post Office] email from 2008."

25 You give the cross-reference, that's called the

34

1 **A.** Yes.

2 **Q.** This is Fujitsu providing the answers, yes?

3 **A.** Yes.

4 **Q.** Mr Davidson of Fujitsu, James Davidson, says:

5 "Please see Fujitsu's response below.

6 "Summary:

7 "There is no ability to delete or change records

8 a branch creates either in [old or new Horizon].

9 Transactions in both systems are created in a secure and

10 auditable way to ensure integrity, and have either

11 a checksum (old Horizon) or a digital signature (Horizon

12 Online), are time stamped, have a unique sequential

13 number and are securely stored via the core audit

14 process in the audit vault.

15 "Whilst a facility exists to 'inject' additional

16 transactions in the event of a system error, these

17 transactions would have a signature that is unique,

18 subpostmaster IDs are not used and the audit log would

19 house a record of these. As above, this does not delete

20 or amend original transactions but creates a new and

21 additional transactions.

22 "This facility is built into the system to enable

23 corrections to be made if a system error/bug is

24 identified and the master database needs updating as

25 a result, this is not a unique feature of Horizon.

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1 "Approvals to 'inject' new transactions are governed
2 by the change process, 2 factor authentications and
3 a 'four eyes' process. A unique identifier is created
4 and can be audited for this type of transaction within
5 [Horizon Online], Horizon would require more extensive
6 work to investigate as explained below."
7 Then answers to the direct questions that you had
8 posed arising from Second Sight's questions:
9 "1. Can Post Office change branch transaction data
10 without a subpostmaster being aware of the change? No."
11 But then:
12 "2. Can Fujitsu change branch transaction data
13 without a subpostmaster being aware of the change?"
14 Answer:
15 "Once created, branch transaction cannot be changed,
16 only additional data can be inserted. If this is
17 required, the additional transactions would be visible
18 on the trading statements but would not require
19 acknowledgement/approval by a subpostmaster, the
20 approval is given by the Post Office via the change
21 process. In response to a previous query Fujitsu
22 checked last year when this was done on Horizon Online
23 and we found only one occurrence in March 2010 which was
24 early in the pilot for Horizon Online and was covered by
25 an appropriate change request from Post Office and

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1 **A.** I think so, yes. But, I have to say, I'm saying that
2 today, so ...
3 **Q.** Now, it seems that, on receiving these answers from
4 Fujitsu, Mr Parsons produced a draft note for Second
5 Sight, which he sent to you for approval or comment.
6 Can we look at that, please. That's, I think, at the
7 beginning of B/100. In fact, it's sent to Angela van
8 den Bogerd and copied to you. So that's the same
9 document we were looking at, POL00304478, page 1.
10 **A.** I have it, thank you.
11 **Q.** I'll just wait for it to come on the screen. Maybe if
12 we look at page 2 first. We can see his direct email to
13 you, copied to Ms van den Bogerd.
14 "Have you had a chance to look at the attached
15 note?"
16 I'm not going to look at that attachment now:
17 "[Second Sight] are now pushing for this answer so
18 that they can build it into the fact file so we need
19 an answer [as soon as possible].
20 "The question posed by [Second Sight] is:
21 "As requested at the [Working Group] meeting Post
22 Office are asked to produce a formal certification that
23 it is not possible for anyone to access Horizon/[Horizon
24 Online] and amend transaction data without the knowledge
25 of the subpostmaster or their staff."

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1 an auditable log. For Old Horizon, a detailed
2 examination of archived data would have to be undertaken
3 to look into this across the lifetime of use. This
4 would be a significant and complex exercise to undertake
5 and discussed previously with Post Office but this
6 counted as too costly and impractical."
7 **A.** Yes.
8 **Q.** Overall, what did you take from either the summary or
9 the detailed answers that were given as to the ability
10 for data to be changed without the knowledge of
11 a subpostmaster?
12 **A.** It couldn't be done.
13 **Q.** It couldn't be done?
14 **A.** It couldn't be done.
15 **Q.** Even notwithstanding the answer given to question 2?
16 **A.** What I understood question 2 to say is you couldn't
17 change the data but the overall position, say, of
18 a branch's account could be changed by the injection of
19 a new and identifiable entry.
20 **Q.** Did you regard that as an important point, that although
21 data couldn't be changed, the overall trading position
22 could be amended by the injection of new data?
23 **A.** Yes.
24 **Q.** Did you realise the distinction between those two things
25 at the time?

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1 What did you understand by "formal certification"?
2 **A.** I'm not sure I did. I wasn't engaged directly with
3 Second Sight on this, so I'm not sure of the style they
4 were after.
5 **Q.** A response to the question is proposed to you by
6 Mr Parsons. Did you think that this equated to the
7 response that the Post Office ought to give?
8 **A.** I might just re-read it.
9 **Q.** Yes. *(Pause)*
10 **A.** It's a summary. I don't know whether it was going to be
11 sufficient for Second Sight's purposes or not because
12 I wasn't quite sure what they were after but it seems
13 a summary, yes.
14 **Q.** It takes the point that "it's not clear what's meant by
15 certification but we've gone off to Fujitsu and the Post
16 Office's IT team". To your mind, did the summary which
17 then follows in the second line onwards of the proposed
18 response, properly summarise the information that
19 Mr Davidson had given you?
20 **A.** As I say, it's a summary and I think it's consistent
21 but, whenever you summarise something, there's always
22 the risk you leave a -- you put a baby out with the
23 bathwater. But I thought it was a fair summary, yes.
24 **Q.** What about the fact that, in answer to question 2,
25 you'll recall that Mr Davidson had said that additional

40

1 data can be inserted but that would not require the
 2 acknowledgement or approval of a subpostmaster,
 3 approvals given by the Post Office itself?
 4 **A.** Um --
 5 **Q.** It doesn't reflect that, does it?
 6 **A.** Well, I'm sort of looking at it, although it's -- not
 7 specifically, as I said, a summary, but it is possible
 8 to input transactions and they will have visibility of
 9 the extra transactions as they're shown separately in
 10 the branch's accounts. So I think that's -- the
 11 visibility point was seeking to address that.
 12 **Q.** Can we look, then, at the Deloitte report, which was
 13 23 May 2014. POL00028062, that's B/119.
 14 **A.** I have it. Thank you.
 15 **Q.** So this is about a fortnight after that summary for
 16 Second Sight was being compiled, yes?
 17 **A.** Yes.
 18 **Q.** A bit longer than that, it was about month after?
 19 **A.** I beg your pardon.
 20 **Q.** We were looking at 22 April email exchanges and this is
 21 23 May.
 22 **A.** That's a month. Thank you for clearing that up.
 23 **Q.** This was delivered directly to you, yes?
 24 **A.** I don't know if it was delivered directly to me but
 25 I received it, as in I can't remember who else got this

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1 points?
 2 **A.** I don't know whether they jumped out at the time or not.
 3 I don't.
 4 **Q.** You tell us in your witness statement -- no need to turn
 5 it up -- that it's regrettable but not deliberate that
 6 when a statement was made to the BBC --
 7 **A.** Oh, yes.
 8 **Q.** -- that it's not possible for the Post Office or Fujitsu
 9 remotely to edit transactions as they were recorded by
 10 branches, which was incorrect, that you essentially had
 11 missed these --
 12 **A.** Yes.
 13 **Q.** -- paragraphs, inadvertently missed these paragraphs, in
 14 the Deloitte report --
 15 **A.** Yes.
 16 **Q.** -- is that right?
 17 **A.** Yes, it is.
 18 **Q.** So that's making incorrect statements to the BBC but
 19 what about Second Sight? If we go back to Second Sight,
 20 POL00030160. That's E/24. This is the Second Sight
 21 Report of 21 August. If we go forwards to
 22 paragraph 11.2 -- I'll let you catch up, e/24.
 23 **A.** Thanks. I have the document.
 24 **Q.** Yes, if we go forwards, please, to page 14 at the
 25 bottom. Thank you, you've got it.

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1 or when.
 2 **Q.** Can we look at page 31, please.
 3 **A.** I have it. Yes.
 4 **Q.** If we just scroll down a little bit, under "Hardware
 5 controls over the Audit Store":
 6 "The Centera EMC devices used to host Audit Store
 7 data have not been configured in the most secure EC+
 8 configuration. As a result system administrators on
 9 these boxes may be able to process changes to the data
 10 stored within the Audit Store, if other alternative
 11 software controls around digital seals, and key
 12 management are not adequately segregated from the
 13 Centera box administration staff. Privileged access to
 14 the cryptographic solution around digital signatures,
 15 and publicly available formulas on MD5 hashed digital
 16 seals would potentially allow privileged users at
 17 Fujitsu to delete a legitimate sealed file, and
 18 replacement with a 'fake' file in an undetectable
 19 manner."
 20 Then further down at the bottom last bullet point:
 21 "Controls that would detect when a person with
 22 authorised privileged access used such access to send
 23 a 'fake' basket into the digital signing process could
 24 not be evidenced to exist."
 25 When you read the report, did you spot those two

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1 **A.** I have it. Thank you.
 2 **Q.** "Post Office has confirmed that it is not, and has never
 3 been, possible for anyone to access branch data and
 4 amend live transactional cash or stock data without the
 5 knowledge of subpostmasters or their staff."
 6 Did you read this Second Sight Report.
 7 **A.** Yes, but I don't recall doing it particularly in detail.
 8 I'm sure I did and I'm sure I reviewed it but don't wish
 9 to --
 10 **Q.** Did what you read there, which does accurately summarise
 11 what the Post Office had said to Second Sight, clash
 12 with either what you had been told in the email exchange
 13 of April 2014 or the knowledge that you had,
 14 constructively at least, from the Deloitte report?
 15 **A.** So, looking at -- the consistency point was, as probably
 16 noted, as in that it is consistent with the summary that
 17 was provided, the interim summary, I think, Andy
 18 described it as, in the email. I think, when I -- and
 19 I re-read this to try to understand why -- to try to
 20 piece together, for the purposes of this Inquiry, how
 21 I missed it, when we look at the -- can we go back to
 22 the Deloitte report section you took me to earlier --
 23 **Q.** Yes, of course. That's POL00028062.
 24 **A.** I think it's --
 25 **Q.** Which part do you want to go to?

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1 A. I think it's page 31, from memory.
 2 Q. Page 31.
 3 A. Thank you. So when you look at section -- and I'd
 4 stress, this is something I've reconstructed for the
 5 purposes of here, so I don't wish to say this is what
 6 I was thinking at the time because I don't recall, but
 7 what was described over the controls over the -- of the
 8 audit store was that it looked like it would require
 9 a deliberate circumvention of controls for that risk,
 10 those sorts of transactions, to be entered, you know,
 11 it's -- it says sort of if other controls and key
 12 management are not adequately segregated -- so there's,
 13 you know, that had to be a breakdown -- administrative
 14 staff with access could basically remove, change and
 15 reinsert an entry, but it would require faking a key.
 16 So some form of deliberate action, in order to do it.
 17 So if we're starting to get into theoretical extensions.
 18 And I think I also saw an email from one of the Deloitte
 19 team members who explained this to me in a little bit
 20 more detail and he said, "We're still looking into it
 21 and there may be other controls around it, including" --
 22 Q. After this report they sent an email?
 23 A. I can't remember whether it was before or after, I'm
 24 sorry.
 25 Q. It was explaining what this meant?

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1 statements that had been made, either to the BBC or to
 2 Second Sight?
 3 A. I think two bits and yes to both.
 4 Q. Can we go forwards then, please, in the interests of
 5 time to POL00091394. That's E/48. This is an email of
 6 10 October 2014 from Melanie Corfield to a group of
 7 people, including you; can you see that? In fact, we
 8 had probably better look at page 2 first, and then come
 9 to page 1.
 10 Second Sight, so let's just scroll up to see who was
 11 saying what a little bit further. Thank you. Jessica
 12 Barker, to a group of people including you, to a draft
 13 CRR for case number, M053:
 14 "Some background to this: you will remember that
 15 [Second Sight] originally uploaded a draft ... some
 16 weeks ago, but it transpired that there were some
 17 exhibits they had not shared with [Post Office]. With
 18 the new exhibits, [Post Office] reinvestigated and
 19 produced an updated [report]."
 20 They're both attached:
 21 "Bond Dickinson will produce the draft response and
 22 settlement analysis by [a date] please reply to all with
 23 your comments ..."

24 Then if we go to page 1 at the foot of the page,
 25 Belinda Crowe says:

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1 A. Yeah, what that finding was, yes, and it struck me as
 2 being unlikely, if I may, and I don't mean this in
 3 a legal sense because I'm not sure whether it is or not,
 4 but it would be deliberate wrongful action, it would be
 5 a fraudulent action required to do it.
 6 Q. And, therefore, would be inherently unlikely?
 7 A. That's what I'm thinking but, as I say, I am
 8 reconstructing, I'm sorry.
 9 Q. Just to explore the logic that you're reconstructing,
 10 why would it be inherently unlikely that a person would
 11 commit fraud?
 12 A. Normally you'd do it for personal advantage and
 13 I couldn't see how that would flow from this.
 14 Q. So, ie they would personally have no gain from it?
 15 A. Correct. What I think I was a bit more interested about
 16 is section G, which dealt with the balancing
 17 transactions, and the insertion of the additional things
 18 that we had been or seeking to flag, and I think we also
 19 sought to flag with the BBC as part of this continuous
 20 line, but we certainly missed this -- I beg your pardon,
 21 I certainly missed this.
 22 Q. Did everyone miss it, to your knowledge?
 23 A. Well, I think others missed it, as well, because others
 24 had access to this report.
 25 Q. Nobody picked it up and nobody corrected the past

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1 "Is this the first which references remote access?"
 2 Yes?

3 A. Yes.
 4 Q. So the first case in the Mediation Scheme which refers
 5 to remote access. Then she says:

6 "I think we need to pick this up very robustly in
 7 our response as this could become public and Second
 8 Sight seem to be asking for proof that something didn't
 9 happen.

10 "... could we dust off our lines on this ..."

11 Then up the page, please. Melanie Corfield says:

12 "Our current line if we are asked about remote
 13 access potentially being used to change branch
 14 data/transactions is simply: 'This is not and never has
 15 been possible'.

16 "This line holds but if we are pressed regarding
 17 [Second Sight's] points about 'admitting' there is
 18 remote access ... we can say: 'There is no remote access
 19 for individual branch transactions'.

20 "We might get pushed further on it and be asked by
 21 media to confirm whether or not there is any remote
 22 access. We will need to make the distinction re access
 23 as straightforward as we can to suggest: 'There is no
 24 remote access for individual branch transactions.
 25 Fujitsu has support access to the "back-end" of the

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1 system used for software updates and maintenance. This
 2 is of course strictly controlled with security processes
 3 in place, but could not, in any event, be used for
 4 individual branch transactions -- there is no facility
 5 at all within the system for this'."

6 On the basis of what you've been told by the
 7 17 April email and what was in the Deloitte report,
 8 those lines to take were not accurate, were they?
 9 **A.** No, they're not. We do know there is -- sorry, no,
 10 they're not.
 11 **Q.** I think, to your knowledge, did anyone point out that
 12 those lines to take were not accurate?
 13 **A.** I know at various times I sought -- but I don't know in
 14 the timeline overall. At various times I sought to draw
 15 to attention the balancing transaction possibility but
 16 not the audit store one we've talked about. But I don't
 17 know whether, in connection with this email and the time
 18 of it, I don't know whether that was done or not at that
 19 ...

20 **MR BEER:** Thank you, Mr Williams.
 21 Sir, that might be an appropriate moment to take the
 22 morning break. Can we say until 11.25, please?

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

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

25 (11.09 am)

1 to better understand the risk that this may present to
 2 the integrity of the data held in the audit store ...
 3 "Can you please send me a summary of this specific
 4 technical issue and the controls that are in place ...
 5 I do not need a narrative on how the issue came to be
 6 identified or investigated, just a statement of the
 7 current position."

8 Just to make clear, this debate you're having is
 9 about Horizon Online only, not looking backwards to the
 10 position as it was in Legacy Horizon.

11 **A.** I can't say now but I'm not sure I'd have been making
 12 that distinction, although, actually, as I say that,
 13 Deloitte were only looking at Horizon Online so, yes,
 14 that would be correct.

15 **Q.** Thank you. Then if we look at page 2, and scroll down,
 16 please, this is his reply. He says:

17 "So the key difference for our purposes is that
 18 accounts with correct access rights would be able to
 19 delete (but not modify existing) Audit Store records ...

20 "This risk should be largely mitigated by the unique
 21 sequence numbers ...

22 "There remains a small risk ... that some one with
 23 the requisite access rights to the 'digital keys' used
 24 in the sealing process and admin access on the Audit
 25 Store could theoretically:

1 (A short break)

2 (11.25 am)

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

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

5 **MR BEER:** Thank you, sir.

6 Mr Williams, before the break you mentioned an email
 7 you received from Deloitte's and you weren't sure
 8 whether it was before or after their report of 22 May
 9 2014. Can we look at it, please, to try to help you.
 10 POL00029728, and that's B/112 for you.

11 **A.** I'm sorry, B?

12 **Q.** 112.

13 **A.** I beg your pardon.

14 **Q.** Can we go to page 3, please. Look at the email at the
 15 bottom of the page.

16 **A.** Yes.

17 **Q.** We can see this is 20 May, if we scroll up a little bit,
 18 and it's your exchange with Mark Westbrook of Deloitte's,
 19 yes? So we can see it's before the report?

20 **A.** There we go. Thank you.

21 **Q.** You say:

22 "In the course of preparing your Board Update, you
 23 identified an example where 'a [Horizon] control was not
 24 implemented as understood' ...

25 "I understand you have since done some further work

1 "Delete an Audit Store record ...

2 "Recreate the transactional data that was originally
 3 within that Audit Store file to suit whatever purpose
 4 they might have ...

5 "Seal it using the correct key to generate a valid
 6 seal value.

7 "Reinsert it into the database (you would need to
 8 alter the database of seal values as well to make this
 9 change undetectable).

10 "There is an additional complexity that the
 11 transactions themselves ... are also digitally sealed by
 12 a digital signature.

13 "The question therefore becomes does anyone have the
 14 requisite access to this Centera boxes and rights to key
 15 management to be able to exploit this? This is
 16 currently with [one of the Fujitsu staff]."

17 You'd obviously, before receipt of the report,
 18 centred on or highlighted for yourself this important
 19 issue of remote access --

20 **A.** Yes.

21 **Q.** -- and this exchange all takes place on 20 May, yes?

22 **A.** Yes.

23 **Q.** So, when you get the report on 22nd May, presumably,
 24 having highlighted for yourself the importance of what
 25 Deloitte were going to say about remote access, you

1 would especially pay attention to the bit of the report
 2 which concerned remote access.
 3 **A.** I would like to think I did that, and I think that's
 4 fair, probably, yes.
 5 **Q.** So how come what we saw on page 31 was missed by you,
 6 then?
 7 **A.** It -- well, as I say -- I sought to explain, I think --
 8 and this tends to support it, and I'm -- is that it was
 9 a theoretical possibility that had controls around it to
 10 mitigate the risk, which was small and was being
 11 investigated further. And so, I think off the back of
 12 that, I -- I clearly went from my mind because I don't
 13 recall it popping up for -- when we were being asked
 14 later about lines on the remote access, what to say to
 15 interested public -- interested parts of the public
 16 about remote access.
 17 **Q.** That's a slightly different answer to "I inadvertently
 18 missed, on page 31 of the Deloitte report, the reference
 19 to remote access". That's "I did clock it", speaking
 20 colloquially, "but I thought that it was only
 21 a theoretical possibility and, therefore, could be
 22 dismissed from any answers that we were giving".
 23 **A.** I'm sorry if I -- I've if I've been imprecise with that.
 24 I apologise for that.
 25 **Q.** So it's the latter category: that you realised this form

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1 "I also note a comment about it being [possible] to
 2 remotely access the system. It is true that such access
 3 is possible; however in an analysis of data audited by
 4 the system, it is possible to identify any data that has
 5 not been input directly by staff in the branch. Any
 6 such change to data is very rare and would be authorised
 7 by Post Office Limited. As I have not had
 8 an opportunity to examine data related to this branch,
 9 I cannot categorically say this has not happened in this
 10 case, but would suggest it is highly unlikely'."

11 Then Mr Parsons says:

12 "I'm pretty certain that [Mr] Jenkins is referring
 13 to the Balancing Transaction process that allows
 14 [Fujitsu] to input new transactions rather than edit old
 15 transactions. Nevertheless, this will be a red rag to
 16 Second Sight.

17 "Can we discuss ..."

18 "I don't think we need to bottom this out before the
 19 [Second Sight] meetings. We'll just say we are working
 20 on reviewing the legal files ..."

21 Then scroll up, please. Stop there. You say:

22 "This is consistent with our responses/statements
 23 about remote access isn't it, ie you can add data/inject
 24 a balancing transaction, and if done 'it is possible to
 25 identify any data that has not been input directly by

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1 of remote access was possible but, because it was
 2 theoretical and you couldn't understand the motive of
 3 anyone that wanted to do this, you put from your mind,
 4 when formulating responses, the need to include such
 5 a reference?
 6 **A.** No, I'm stressing this is where I've got to having tried
 7 to reconstruct the events for the purposes of this
 8 Inquiry. So I'm not trying to say that's was happening
 9 at the time. I genuinely don't recall what happened at
 10 the time.
 11 **Q.** I understand.
 12 **A.** But I know I missed it so I wanted to find out why.
 13 **Q.** Can we move forward, to the following year, in March
 14 2015 and look at POL00312743. That's E/126 for you.
 15 **A.** Thank you.
 16 **Q.** Can we look at the bottom of the email, please. Thank
 17 you. Have you got that?
 18 **A.** I do, sorry. Thank you.
 19 **Q.** It's an email of 3 March from Andrew Parsons to, amongst
 20 others, you. It concerns the case of Wylie, another one
 21 of the mediation cases, and Mr Parsons says:
 22 "We've been through the prosecution file for ...
 23 Wylie. There will be further documents to disclose
 24 including the attached witness statement [of] Gareth
 25 Jenkins. At the top of page 3 [Mr] Jenkins states:

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1 staff in the Branch'?"

2 Then scroll up, Mr Parsons says:

3 "Not quite -- we say that transactions entered by
 4 [subpostmasters] cannot be edited but we don't go on to
 5 say that [Fujitsu] can input new transactions in
 6 exceptional circumstances. This information would
 7 therefore be entirely new news to [Second Sight]."

8 Can you explain what the Post Office did at this
 9 stage to explain to Second Sight that Fujitsu could
 10 inject new transactions into branch accounts in
 11 exceptional circumstances?

12 **A.** This one of the documents, I think, that was reasonably
 13 late, so I wasn't able to --
 14 **Q.** Sorry, late?
 15 **A.** Sorry, not late. I didn't mean to say that. I received
 16 it lately, I got it last Friday and, in the time,
 17 I haven't contextualised this to know what we went on to
 18 do with this or what I was doing at that time. So
 19 I don't think I can answer your question, I'm sorry.
 20 **Q.** Do you think something should have been done to reveal
 21 to Second Sight that, in fact, that Fujitsu could inject
 22 new transactions in branch accounts in exceptional
 23 circumstances?
 24 **A.** Well, I think that was happening through the balancing
 25 transaction issue, which was being -- but I don't know

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1 where that sits in the timeline on this. I'm sorry,
 2 that's what I was trying to say around contextualising,
 3 I don't know what we did around that. I recall that we
 4 were going to lengths to acknowledge the balancing
 5 transaction issue.

6 **Q.** Do you think this is talking about balancing
 7 transactions, then?

8 **A.** To me, whenever we talked about injecting, that was the
 9 balancing transaction. That was putting something new
 10 in.

11 **Q.** Can we move on, then, to POL00029843. This is another
 12 Simon Clarke advice. It's dated 27 March 2015.

13 **A.** Thank you.

14 **Q.** Essentially, it concerns the issue of whether the
 15 Deloitte report of May the previous year needs to be
 16 disclosed. If you scroll down, he says:

17 "In this Note, references to the 'Deloitte Report'
 18 are references to Draft 16 of the report ..."

19 In fact, the version there is 23 May.

20 **A.** Could I have the reference for this one, please?

21 **Q.** Sorry?

22 **A.** Could I have the reference for this one, please?

23 **Q.** Yes, I haven't got a tab number, I'm sure Mr Stevens
 24 will assist. POL00029843, B/174.

25 **A.** Thank you. I'm grateful. Thank you.

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1 were on page 31 of the Deloitte report.

2 **A.** Yes.

3 **Q.** Agreed?

4 **A.** Agreed.

5 **Q.** He says:

6 "This material is potentially disclosable in cases
 7 where a convicted defendant has raised, as part of his
 8 defence ... the suggestion that ..."

9 Scroll down, please:

10 "[Post Office] or some other third party had
 11 manipulated, interfered with or otherwise compromised
 12 Horizon; or
 13 "Horizon had created or was the victim of a system
 14 generated but inexplicable loss/entry/transaction(s); or
 15 "The defendant simply had no idea how the relevant
 16 loss arose."

17 When you read this advice, as I think it was sent to
 18 you, did you return to the Deloitte report to consider
 19 the extracts identified by Mr Clarke in context?

20 **A.** I don't recall doing that, no. I may have done but
 21 I don't recall doing that.

22 **Q.** You, I think, tell us in your witness statement that it
 23 wasn't until the Swift Review that you became aware of
 24 the conclusion of the Deloitte report on page 31 as to
 25 remote access. I'm summarising your witness statement.

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1 **Q.** The passage which is on screen, paragraph 2:
 2 "Page 31, paragraph 'g' of the Deloitte Report
 3 identifies a method of posting of 'Balancing
 4 Transactions', that is, the posting of '... additional
 5 transactions centrally without the requirement for these
 6 transactions to be accepted by the subpostmasters ...'
 7 The paragraph goes on to indicate that, 'Whilst an audit
 8 trail is asserted to be in place over these functions,
 9 evidence of testing of these features is not available
 10 ...'
 11 "Later extracts for this paragraph are also of
 12 concern:
 13 "For Balancing Transactions ... we did not identify
 14 any controls routinely to monitor all centrally
 15 initiated transactions to verify that they are all
 16 initiated and actioned through known and governed
 17 processes, or controls to reconcile and check data
 18 sources which underpin current period transactional
 19 reporting for subpostmasters to the audit store record
 20 of such activity ...
 21 "Controls that would detect when a person with
 22 authorised privileged access use such access to send
 23 a fake basket into the digital signing process could not
 24 be evidenced to exist'."
 25 So he is picking up, essentially, the points that

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1 **A.** I've said what I've said in my statement on that.

2 **Q.** What was done as a result of this advice by you?

3 **A.** So by me, I think -- I think I tried to describe part of
 4 my role, when I, say, didn't have the capacity to deal
 5 with matters, I would try and ensure that the legal
 6 support to address it for the business was picked up by
 7 those we were instructing or available to deal with it.

8 So I don't recall taking this forward but I think
 9 you can see from this, I sought to join up Womble Bond
 10 Dickinson, who were supporting Post Office on issues
 11 arising out of the scheme, the Mediation Scheme, with
 12 Cartwright King, to make sure that those developments
 13 were properly considered from a criminal perspective, as
 14 long as I could see that direction of travel, I left
 15 them to it, I think.

16 **Q.** To your recollection, was it really only until Jonathan
 17 Swift in 2016 identified the importance of the Deloitte
 18 conclusion that the Post Office, so far as you were
 19 aware, woke up to the importance of the Deloitte report?

20 **A.** The report on the audit store access?

21 **Q.** Yes.

22 **A.** That's my evidence. That's what I recall now, so yes,
 23 it is, and I regret it, I promise.

24 **Q.** So, to your knowledge, quite a few people missed this?

25 **A.** I think if we see Simon had the same report and is

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1 focused on the balancing transaction section when the
 2 audit store piece is equally above it. But I can't
 3 speak for Simon on that, I'm sorry. That's just
 4 something I noticed when I was looking at it recently.
 5 **Q.** Can we turn to what happened when maybe the penny
 6 started to drop, at E/19 for you, for us POL00028057.
 7 **A.** Thank you.
 8 **Q.** This is a note of an internal meeting attended by three
 9 members of Deloitte, including Mr Westbrook, with whom
 10 you'd exchanged emails, and four members of the Post
 11 Office. It doesn't include you, yes?
 12 **A.** I can see the document.
 13 **Q.** It concerns Project Sparrow and the Chairman's report
 14 recommendations. After "Introductions", if we can
 15 scroll down to paragraph 2, under the "Legally
 16 privileged character of proposed work and the
 17 applicability of Non-Disclosure Agreement(s)":
 18 "[Mr Bourke] articulated the importance of being
 19 able to assert Legal Privilege over any piece(s) of work
 20 that were commissioned in response to the
 21 recommendations included in the Chairman's report."
 22 Did you have any part of drawing up or involvement
 23 in the Chairman's report.
 24 **A.** I did have involvement in the Chairman's report, yes.
 25 **Q.** Can you explain what the Chairman's report was, then?

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1 **Q.** If you look at the second page.
 2 **A.** I don't recall seeing this note before. I may have been
 3 sent it but don't have any recollection of this and it's
 4 ...
 5 **Q.** If we look at the second page.
 6 **A.** Oh, here we go. Thank you.
 7 **Q.** Mr Whitton, I think that is:
 8 "Andrew asked, referencing his email [to you], that
 9 a [Frequently Asked Questions] type document which
 10 addresses how to maintain Legal Privilege be produced,
 11 and whether the existing [non-disclosure agreement] with
 12 Deloitte would suffice for this ... piece of work or
 13 [whether]:
 14 "The letter of engagement from the June 2014 work
 15 could be reused/tweaked.
 16 "It would be necessary for new [non-disclosure
 17 agreements] and engagement letters would be required.
 18 "[Post Office] said it would confirm this with its
 19 General Counsel."
 20 Do you recall being tasked, after this meeting,
 21 4 February 2016 with the production of an FAQ document
 22 addressing how to maintain legal privilege?
 23 **A.** Sorry, just two things. We've referenced an email to me
 24 that don't recall seeing but the answer to your question
 25 is I don't recall being tasked with that, no.

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1 **A.** Yes, sorry -- and I might need some help with the dates
 2 because they do blur. I think it was sometime in, is it
 3 mid-2015, August 2015, maybe? Around that time, I think
 4 the -- we had -- Post Office had a new incoming Chair,
 5 called Tim Parker, who I understood had been asked by
 6 certainly a minister with responsibility -- some form of
 7 responsibility or oversight of connection to Post
 8 Office -- to look into the postmaster Horizon
 9 complainants to see whether -- see what had taken --
 10 what had been done to date and whether anything more
 11 ought to be done.
 12 And, off the back of that, the Chairman decided to
 13 undertake a review of those actions to see what else
 14 could be done. In shorthand, it was a sort of gap
 15 analysis, I think. But that may not be a fair
 16 description of it. That's one way I looked at it.
 17 **Q.** Here Mr Bourke was setting out the importance of being
 18 able to assert legal privilege over work that was
 19 commissioned in response to recommendations included in
 20 that report, yes?
 21 Can you recall having been tasked to produce
 22 a document following that note there?
 23 **A.** Er --
 24 **Q.** If you look --
 25 **A.** Directly in response to --

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1 **Q.** Can you recall discussion at the time of how important
 2 it was that, either through a non-disclosure agreement
 3 and/or legal privilege, work conducted by Deloitte
 4 should enjoy protection from disclosure?
 5 **A.** I don't recall that specifically but I do think it's
 6 right to say that Post Office was keen to be able to
 7 assert privilege if appropriate over Deloitte's work.
 8 I think that --
 9 **Q.** Why was that?
 10 **A.** Because it's -- I think there was, by sort of February
 11 2016 -- well, there's a -- two things. One -- well,
 12 I don't actually know what the work is here, so I don't
 13 know what the meeting is, so I don't know there -- but
 14 there is -- at this time, we are very, very close to the
 15 Group Litigation starting. We may have had contact from
 16 Freeths by this time. I think, over a year before,
 17 there'd been a press release around the time that the
 18 Mediation Scheme was breaking up that, I think, Edwin
 19 Coe had been consulted about a claim, so there's this
 20 feeling that litigation was imminent.
 21 **Q.** So it was that legal proceedings were in contemplation,
 22 or you thought in the minds of others they were in
 23 contemplation?
 24 **A.** For the purpose of privilege, I'm not necessarily sure
 25 because we need to look at it but there was a feeling

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1 that we were going to get sued. In fact, it may have
2 been more than that, there may have been strong
3 indications by this time but, again, I haven't been able
4 to contextualise this particular (*unclear*), so I'm
5 worried I'm over reaching with my memory.

6 **Q.** Okay, thank you, that can come down and you can put it
7 back in your file.

8 At this time, was any action taken to correct the
9 statements that had been made either to the BBC or to
10 Second Sight?

11 **A.** No. I don't know about -- probably not -- I don't
12 recall any steps being taken. I definitely don't think
13 any went to the BBC. I don't know what the engagement
14 with Second Sight was at that time but I suspect it was
15 minimal.

16 **Q.** Do you know why such -- if it is the case that no steps
17 were taken to correct statements that had been made, why
18 that was?

19 **A.** I don't know why we didn't do something. I'm sorry.

20 **Q.** The last topic from me, please. Were you a party to
21 discussions over the use of Gareth Jenkins as a witness
22 in the Group Litigation?

23 **A.** I believe I was, yes.

24 **Q.** Can we turn up paragraph 240, please, of your witness
25 statement, which is page 122. So 240 is at the foot of

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1 "... in advance of the con with counsel on Monday,
2 please see the email below and attachments ..."

3 Then if we scroll down, so you can just get some
4 context, and then keep reading, and then scroll down,
5 please.

6 Then at the bottom of the page:

7 "In terms of evidence from [Fujitsu], we believe we
8 will need ..."

9 Three categories of evidence are set out:

10 "Having spoken to [Fujitsu], there are parts of
11 points 2 and 3 that any Gareth Jenkins can realistically
12 provide ...

13 "To be clear, Gareth would be called as a witness of
14 fact. He will be providing descriptive evidence of
15 systems and [procedures], and perhaps his investigations
16 certain bugs. He is not being asked to give an opinion.
17 The opinion will be given by our expert witness,
18 Dr Robert Worden, based on the factual foundations set
19 [out] by the witness evidence of [Fujitsu] ...

20 "The con ... will be with Tony Robinson and Simon
21 Henderson ... The purpose of the [conference] is to
22 discuss the risks of using Gareth Jenkins as a witness
23 given his previous role as a prosecution witness."

24 Thank you. Before this conference, I think you
25 probably knew that Mr Jenkins had been regarded by the

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1 the page and you say that:

2 "A conference was held in September 2018 to discuss
3 whether to rely on Gareth Jenkins as a witness at the
4 Horizon Issues Trial. I attended that conference, along
5 with counsel for the Horizon Issues Trial, Anthony
6 de Garr Robinson [Queen's Counsel] and Simon Henderson
7 of counsel, Simon Clarke and Martin Smith of Cartwright
8 King and Andy Parsons of [Womble Bond Dickinson]. As
9 can be seen from [an email], there was a concern about
10 using Gareth Jenkins as a witness in the Horizon Issues
11 Trial given his previous role as a prosecution witness,
12 and Simon Clarke's advice to [the Post Office] was that
13 his credibility as an expert witness had been 'fatally
14 undermined'."

15 Just stopping there, as far as I'm aware, we haven't
16 got a note of that conference -- at least I haven't been
17 able to find one -- despite the number of lawyers that
18 were there. But can we look, please, at your view
19 before you attended the conference, by looking at
20 POL00042015, which is B/280.

21 **A.** Yes, thank you.

22 **Q.** Have you got it?

23 **A.** Yes.

24 **Q.** It's an email from you to Mr Clarke, Mr Smith and
25 Mr Parsons, ahead of the conference and you say:

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1 Post Office as a witness who had breached his expert
2 duties and was being blamed by the Post Office for the
3 need to review some convictions. Were you, before the
4 conference, proceeding on the basis that Mr Jenkins
5 would be a witness in the civil proceedings?

6 **A.** Sorry, there was a big run-up. Sorry, I lost you when
7 you said we were looking to blame Gareth Jenkins. I'm
8 not sure that's correct. Can I have -- I lost you on
9 the question, sorry. My head went to --

10 **Q.** Before the conference, were you proceeding on the basis,
11 as Mr Parsons set out, that Gareth Jenkins would be
12 called as a witness?

13 **A.** No, I think we were proceeding on the basis that he
14 wouldn't.

15 **Q.** This suggests the opposite, doesn't it, before the
16 conference? This says he is going to be called as
17 a witness.

18 **A.** Well, I think the purpose of it was whether he is or
19 isn't. The purpose of this conference was to determine
20 whether he would or wouldn't.

21 **Q.** You tell us in your witness statement that a firm view
22 was taken at the conference that the Post Office should
23 not rely on Mr Jenkins because of "his previous
24 involvement as a witness in the post office
25 prosecutions", yes?

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1 A. Yes.
 2 Q. Was that the decision that was effectively taken?
 3 A. I believe so, yes.
 4 Q. Was any decision taken at that conference as to what use
 5 Mr Jenkins would be put to behind the scenes?
 6 A. I don't recall, but --
 7 Q. This can come down from the screen. Thank you.
 8 A. Quite possibly, yes. Because it was -- all I recall --
 9 I don't recall the specifics but I remember it being --
 10 there were a few lawyers in the room, as you pointed
 11 out -- a fairly full discussion of what the issue was
 12 and how it might play out. I confess I don't remember
 13 the detail but it's possible that was, yes.
 14 Q. Was there any discussion or a decision made that
 15 Mr Jenkins should be a form of shadow expert witness and
 16 contribute indirectly to the Post Office's case by, for
 17 example, feeding information to witnesses that it did
 18 choose to call at the trial?
 19 A. I don't recall -- again, this bit in there -- the
 20 phrase -- I don't recall "shadow expert" being used at
 21 all. I don't recall -- you're quite specific about what
 22 went -- I don't quite recall what was discussed, but
 23 just thinking about it now, it's sort of -- it's
 24 an obvious question: if we're not getting evidence from
 25 him, how does Post Office present the evidence it needs;

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1 Q. -- and he was a tainted witness?
 2 A. Yes.
 3 Q. What measures, guardrails, were put in place, for his
 4 use behind the scenes in the Group Litigation?
 5 A. I wasn't close enough to that work to know. I'm sorry.
 6 Q. To your knowledge, were any such measures put in
 7 place -- guardrails, as I called them?
 8 A. Not to my knowledge, but I don't know whether they were
 9 or weren't.
 10 MR BEER: Yes, Mr Williams. Thank you very much indeed.
 11 Sir, the order, I think, has been agreed between the
 12 Core Participants that Mr Henry first, then Mr Jacobs,
 13 and then Mr Moloney.
 14 Ah, I've just been told that we need a five-minute
 15 break before the questions start.
 16 SIR WYN WILLIAMS: Yes, well, that's fine because, by my
 17 time piece, it's getting close to 12.00 so that if we
 18 have a five-minute break, then Mr Henry will have the
 19 opportunity to ask questions until 12.50, or
 20 thereabouts, and then we'll break for lunch, yes.
 21 MR BEER: Thank you very much, sir.
 22 (11.58 am)
 23 (A short break)
 24 (12.05 pm)
 25 MR BEER: Sir, good afternoon can you see and hear us now?

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1 if it needs evidence, and it would have come from
 2 Mr Jenkins, how else does it get?
 3 So if he -- Gareth -- was, as he, is, you know, the
 4 architect -- I think the original architect of the
 5 system, it's possible he would need to provide
 6 information that the Fujitsu witnesses could provide but
 7 I don't recall whether that was discussed in the
 8 conference or not.
 9 Q. Taking a step back from the narrow confines of the
 10 conference, what was your understanding of the use to
 11 which Mr Jenkins would be put in the course of the Group
 12 Litigation?
 13 A. He would be available to provide technical evidence to
 14 Fujitsu witnesses to enable them to give their evidence,
 15 in the Group Litigation.
 16 Q. The Post Office had dropped him as a witness, hadn't
 17 they --
 18 A. Yes, I think that's fair, yes.
 19 Q. -- back in 2014 --
 20 A. Oh, yes, definitely.
 21 Q. -- 2013?
 22 A. For prosecutions, yes.
 23 Q. They'd done so because they'd been advised that he'd
 24 breached his duties to the court --
 25 A. Yes.

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1 SIR WYN WILLIAMS: Yes, I can, thank you.
 2 MR BEER: I think there are some people who are still
 3 finding their seats. Yes, I think it's Mr Henry to
 4 start.
 5 SIR WYN WILLIAMS: Yes.
 6 Questioned by MR HENRY
 7 MR HENRY: May I begin, sir?
 8 SIR WYN WILLIAMS: Of course, yes.
 9 MR HENRY: Thank you so much.
 10 You're your lawyer?
 11 A. Yes.
 12 Q. Not a fixer?
 13 A. I don't know what you mean by "fixer".
 14 Q. Well, you're not a spin doctor, are you? You owe duties
 15 to the court?
 16 A. Yes.
 17 Q. You also have duties established under your code of
 18 conduct, don't you?
 19 A. Yes.
 20 Q. In representing your employer, the Post Office, during
 21 the period 2012 to 2021, did you discharge those duties
 22 at all times?
 23 A. I certainly sought to.
 24 Q. Did you discharge them faithfully?
 25 A. I would hope so. I believe I did.

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- 1 Q. I strongly suggest you did not and that you know you did
2 not; what do you say to that?
- 3 A. I -- well, I'd like to know why you think that.
- 4 Q. I strongly suggest you did not because you were part of
5 the suppression, obstruction and covering-up of people's
6 Article 6 appellate rights, weren't you?
- 7 A. There's a lot in that. I'm sorry, I haven't -- I don't
8 even have the Article in front of me.
- 9 Q. You knew that the CCRC, eventually, after years of
10 delay, were dependent on the outcome of the Horizon
11 Issues judgment, didn't you?
- 12 A. I don't know what the CCRC's investigation or timeline
13 was, I'm sorry. That's the CCRC's work.
- 14 Q. Well, we'll come to that in a moment because I suggest
15 that you knew very well how the CCRC were progressing
16 matters and how people on your behalf had been dripping
17 poison in their ears about there being an explanation
18 for everything to do with the complaints that the
19 subpostmasters had made.
- 20 Let's start off with something surely which is
21 uncontroversial. By 2015, any reasonable prosecutor or
22 respondent would have had questions about Horizon's
23 integrity at the forefront of their collective minds,
24 wouldn't they?
- 25 A. Yes.

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- 1 that paragraph:
- 2 "The difficulty here is made worse by the fact that
3 Garth [not Gareth but 'Garth'] Jenkins, an employee of
4 Fujitsu, has been making statements for use in criminal
5 proceedings which made no references to the very bugs
6 which it is understood he told Second Sight about.
7 People were prosecuted and pleaded guilty following the
8 receipt of his statement which implied no bugs had been
9 found. Of course it would be highly embarrassing for
10 POL were it to be suggested that Fujitsu had informed
11 some part of POL and that information never reached the
12 Security Team."
- 13 Do you see all of that?
- 14 A. Yes.
- 15 Q. This, of course, was in connection with the BBC Inside
16 Out request for an interview, wasn't it? We can see
17 that on the subject line.
- 18 A. That is in the subject line, yes.
- 19 Q. Now -- and I'm going to suggest to you in the strongest
20 terms -- by this time, you were aware of the problems,
21 of course, with Gareth Jenkins, weren't you?
- 22 A. Yes.
- 23 Q. You were also aware of the bugs that Second Sight had
24 concentrated upon --
- 25 A. Yes.

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- 1 Q. I want you to go, please, to your bundle, B/202, and for
2 us it's POL00101968.
- 3 A. 202 was that?
- 4 Q. B/202.
- 5 A. Thank you, sir.
- 6 Q. Could you turn to page 3 of B/202.
- 7 A. Yes.
- 8 Q. Do you see an email there from Jarnail Singh, dated
9 8 January 2015?
- 10 **SIR WYN WILLIAMS:** Sorry, Mr Henry, it's not on the screen
11 yet and I'm following it on the screen.
- 12 Now, it is, thank you. Yes.
- 13 **MR HENRY:** I'll be very grateful if one could go to page 3
14 of that document.
- 15 Could we go down to the bottom, please. Yes,
16 Jarnail Singh. Do you see, in the second paragraph:
17 "Whilst Post Office wish to say that there are no
18 systemic faults, the Second Sight Interim Report which
19 has been disclosed to the defendants and their legal
20 representatives does mention two defects/bugs which give
21 rise to 76 branches being affected by incorrect balances
22 or transactions."
23 It is described as "systemic but not system wide".
24 Then let's omit words, and could you go a few lines
25 down, and you'll see it's in the middle of the body of

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- 1 Q. -- and I suggest you were also aware, or people in your
2 Legal Department were aware, of remote access. So there
3 was a constellation of difficulties facing the Post
4 Office, wasn't there?
- 5 A. There were -- I don't know what a "constellation of
6 difficulties" is, I'm sorry.
- 7 Q. You know perfectly well it's to do with Second Sight,
8 it's to do with Gareth Jenkins and the Clarke Advice and
9 it's to do with the fact that there were people in your
10 department who knew about remote access.
- 11 A. The first two bits, I say yes. The remote access in
12 2015, I'm afraid I can't quite remember where we are in
13 the timeline on remote access there. So I can't say yes
14 or no to that, I'm sorry.
- 15 Q. We'll come to remote access later on. This how you
16 dealt with it, so you had Jarnail Singh at 15:51 -- can
17 we go to page 1 of the document now, please, and could
18 we go down to your response on 8 January 2015. Do you
19 see, this is what you say:
20 "All -- how about this:
21 "Only a court can overturn a criminal conviction",
22 et cetera, et cetera, et cetera.
23 Go to the next paragraph:
24 "Post Office is acutely aware of the duties imposed
25 on it when it brings a prosecution, and is confident

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1 that it has acted in accordance with those duties at all
2 times'."

3 You knew perfectly well that that wasn't true.
4 **A.** No, I don't, because I go on to say -- I put it to the
5 criminal lawyers, Jarnail Singh and Martin Smith,
6 saying -- well, to Jarnail, I say, copying Martin, and
7 saying, "does that work?" Then I go on to say:

8 "... we don't want to refer to the review ...
9 because it will just open up another line of inquiry
10 ..."

11 So I don't think I knew, which is why I put it to
12 the criminal lawyers, who I felt should or could know.

13 **Q.** Did they suggest that that was unwise --

14 **A.** I don't recall what the response was.

15 **Q.** -- because we've already heard about misleading
16 briefings to the BBC, haven't we, when Mr Beer was
17 asking you questions. You knew perfectly well, when you
18 wrote that, that that wasn't true, didn't you?

19 **A.** No, I -- I -- I -- no, I don't agree. I wrote that
20 because I think that's what I understood the position to
21 be. I think it is fair that we were acutely aware of
22 the duties imposed because we'd taken quite a bit of
23 advice on that. Action had been taken as a consequence
24 of that, and that's why -- that formed the foundation
25 for the confidence that it had acted in accordance with

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1 **Q.** Could we go to the text, please. Thank you. Have you
2 got it now?

3 **A.** Yes, I'm sorry, the page number?

4 **Q.** It's the first page "Horizon Issues Trial", 5 June 2019.

5 **A.** Sorry first page -- oh, got you. Sorry. Thank you.

6 **Q.** Do you see in parenthesis:

7 "[Question mark] PEAK on Misra F/333 [arrow] Go to
8 CCRC?"

9 Then beneath that "Check [with] Mandy"; do you see
10 that?

11 **A.** I do.

12 **Q.** Mandy Talbot, correct?

13 **A.** I don't know. There may have been a Mandy in the WBD
14 team who was working on that.

15 **Q.** Do you know Mandy Talbot?

16 **A.** No, I don't.

17 **Q.** You don't. Well, who was Mandy, "Check with Mandy"?

18 **A.** I'm sorry, I don't recall at the moment.

19 **Q.** Right. Let's just take stock here. This is now 2019.
20 From 2013 onwards you had the Russian doll, didn't you,
21 of the Cartwright King review, the Altman review on top
22 of the Cartwright King review and then the Bond
23 Dickinson review of Altman's work. Correct?

24 **A.** I don't believe Bond Dickinson reviewed Brian Altman's
25 work.

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1 those duties. But I was quite keen not make that
2 statement -- or that statement not be made until those
3 better placed to understand it were in place to respond,
4 which is why we put the criminal lawyers on there.

5 **Q.** You knew perfectly well that POL had failed in its
6 duties of disclosure?

7 **A.** Yes.

8 **Q.** You knew perfectly well that it had relied on a liar and
9 a perjurer to convict innocent people?

10 **A.** I don't know that those necessarily follow. I knew that
11 part of this was the evidence that had been provided was
12 not reliable but, in the criminal law context, I just
13 don't know to what extent or how.

14 **Q.** Come off it. You'd read the papers. You'd had Seema
15 Misra's papers on your desk from 2012. You knew
16 perfectly well that he had given evidence in Seema
17 Misra's trial and that he was instrumental -- he was, in
18 fact, the only reason why she'd been convicted.

19 **A.** I'm sorry, I don't know those things.

20 **Q.** Let's go to your E/95, POL00155539. Could we go through
21 the document, please. That's your note book from the
22 *Bates & Others v Post Office* trial, isn't it?

23 **A.** I'm sorry, can I have bundle reference, please?

24 **Q.** It's E/95.

25 **A.** Thank you.

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1 **Q.** You just said that earlier today in questions put to you
2 by Counsel to the Inquiry, that his review was being
3 reviewed by Bond Dickinson?

4 **A.** If that's how it came across, and I'm sorry, I don't
5 recall Bond Dickinson -- I think they assisted in
6 ensuring Brian could review Cartwright King's review but
7 I don't recall instructing Bond Dickinson. They weren't
8 criminal lawyers, so that wouldn't have made sense.

9 **Q.** Well, did you make a mistake, I mean --

10 **A.** I'm sorry if I did. That's what I'm trying to say.
11 I don't believe that would be my -- I don't recall Bond
12 Dickinson reviewing Cartwright King -- sorry, I don't
13 recall Bond Dickinson reviewing Brian's review of
14 Cartwright King's review.

15 **Q.** Well, there will be a transcript --

16 **SIR WYN WILLIAMS:** What Mr Henry has in mind is that
17 Mr Parsons -- I think it was Mr Parsons -- wrote
18 an email making suggestions after Mr Altman had produced
19 his view and I take it, Mr Henry, that's what you're
20 referring to, is it?

21 **MR HENRY:** Sir, that's correct.

22 **SIR WYN WILLIAMS:** Yes.

23 **A.** I can probably answer. That was -- sorry, because I'd
24 like to make sure my first stuff is understood. My
25 understanding of the way the questioning came -- and

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1 again I'm sorry if this hasn't come through -- is
 2 that -- and I think it was Gavin Matthews, sir, who may
 3 have written that email from Bond Dickinson, but it may
 4 equally have been Andy. That came, I think, in response
 5 to Brian's initial assessment or his first look --
 6 **Q.** Do you work closely with him?
 7 **A.** With whom?
 8 **Q.** Brian.
 9 **A.** I've -- I've described as -- we've -- we've worked
 10 together or he's been instructed by Post Office on
 11 matters where I've attended on and off since --
 12 **Q.** First name terms?
 13 **A.** When I meet him, yes. I would say "Hello, Brian".
 14 **Q.** When did you last meet him?
 15 **A.** I think it was at the conclusion of the *Hamilton &*
 16 *Others* Court of Appeal Criminal Division hearings.
 17 **Q.** When did you last speak to him?
 18 **A.** From memory, I think, probably back then. I don't
 19 believe I've spoken to him since but I may have done.
 20 **Q.** Let me return to the words in parenthesis:
 21 "PEAK on Misra F/333 Go to CCRC?"
 22 The Post Office was fighting the GLO tooth and claw
 23 because you all knew that, if you lost the civil
 24 litigation, a cascade of criminal appeals would follow,
 25 didn't you?

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1 we delay, can we get away with it", mentality. What do
 2 you say to that?
 3 **A.** No, I don't know how square brackets in my notebook
 4 feeds into a delay tactic. I'm --
 5 **Q.** You say you didn't at any stage adopt a cynical approach
 6 to disclosure.
 7 **A.** I don't believe I said that, no.
 8 **Q.** Let us go to your document B/182, which is POL00103238.
 9 **A.** Which number, sorry?
 10 **Q.** B/182.
 11 **A.** Thank you.
 12 **Q.** Could we go, please, to page 2. This is you writing to
 13 Andrew Parsons, Andrew Pheasant and Gavin Matthews, and
 14 they're all of Bond Dickinson, aren't they?
 15 **A.** Yes, they are.
 16 **Q.** Right. Let's omit the first paragraph.
 17 **A.** I do apologise.
 18 **Q.** B/182.
 19 **A.** I am sorry. Yes, I have it. Thank you.
 20 **Q.** Do you see the first paragraph:
 21 "I'd like to start thinking about whether and how we
 22 can start forcing the issue with the CCRC ..."
 23 Do you see that?
 24 **A.** Yes.
 25 **Q.** Also you use the expression:

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1 **A.** I don't recall turning my mind to that at the time, no.
 2 **Q.** I suggest you're lying. There was a strategy in the GLO
 3 which was coordinated with the pending appeals, wasn't
 4 there: fight it at all costs?
 5 **A.** There was certainly discussion around appeals over the
 6 Common Issues judgment at that time, yes.
 7 **Q.** Even recuse the judge to put a spanner in the works?
 8 **A.** Post Office made an application to recuse the managing
 9 judge, yes.
 10 **Q.** Why did you need to check with whoever Mandy was to
 11 disclose to the CCRC something blindingly obvious, the
 12 PEAK in Seema Misra's case, which was not disclosed to
 13 her before she was convicted?
 14 **A.** I don't know, this is -- this is my notebook of the
 15 trial, so you can see in the right-hand column, I sort
 16 of draw a line and I try and put references to the
 17 transcripts so I can come back, so these were issues
 18 arising from the trial that may or may not have required
 19 check -- that's my shorthand of live evidence, so
 20 it's --
 21 **Q.** Why did you need a question mark? It was blindingly
 22 obvious.
 23 **A.** It may have -- I -- it clearly wasn't because I put
 24 a question mark.
 25 **Q.** I suggest that this, again, was part of the cynical "Can

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1 "I'm also conscious about the noise about the
 2 receipt payment mismatch issue and its effect on Misra,
 3 to which the document requests may be linked."
 4 That, of course, was, as we can see from the rest of
 5 the document -- no need to take you to it -- the CCRC's
 6 attempts to get information from the Post Office; do you
 7 agree with that?
 8 **A.** Yes.
 9 **Q.** Do you agree "noise" is dismissive?
 10 **A.** I didn't mean to be, it's -- it's a shorthand email that
 11 I think was sent from a BlackBerry that tried to
 12 summarise what was communication/discussion generally,
 13 and I'm -- I -- well, that's just how I use it.
 14 **Q.** It's dismissive, isn't it, in tone: it's just "noise"?
 15 **A.** I didn't say "it's just noise", I said -- I don't know
 16 what more I can say. That's the word I chose to use,
 17 to --
 18 **Q.** You were hoping, by any means, to bring the CCRC
 19 proceedings to an abrupt halt, weren't you?
 20 **A.** No.
 21 **Q.** Let's go to page 1. There are four bullet points,
 22 aren't there?
 23 **A.** Yes.
 24 **Q.** Mm. Now, you recall that this is 2016 and the very
 25 issue that you've described as "noise", the receipts and

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1 payments mismatch issue, the Court of Appeal in *Hamilton*
2 saw that that was a key ground of appeal. You don't
3 disagree with that, do you?

4 **A.** I agree with it, yes.

5 **Q.** Yes. The Post Office didn't have a leg to stand on and
6 you knew that from May 2016, with Tim McCormack's
7 Freedom of Information request, didn't you?

8 **A.** I think there are two bits, you gave me a date and
9 an item. So on the first piece, I didn't know -- I've
10 never known about the safety of convictions. I'm not
11 a criminal lawyer. The second piece, you've referred to
12 an email which might --

13 **Q.** You know perfectly well what I'm referring to because
14 you were taken to it by Counsel to the Inquiry.

15 **A.** I've been taken --

16 **Q.** I'm talking about Mr McCormack's Freedom of Information
17 request where he spoon fed all you needed to know about
18 the injustice that Seema Misra had suffered?

19 **A.** Well, I'd be grateful if I could be taken to the
20 document.

21 **Q.** I'll take you to it in due course.

22 **A.** Okay. Thank you.

23 **Q.** But you were already aware of that because he'd sent it
24 on 20 May 2016. Let's go to page 1 of your B/182.

25 **A.** Yes.

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1 Amanda help?"

2 That was Amanda Pearce of the CCRC, wasn't it?

3 **A.** I would think so, yes.

4 **Q.** Because you'd schmoozed her, hadn't you?

5 **A.** I don't know what --

6 **Q.** You'd developed a very good rapport. That's why it was
7 being suggested that you were trying to get Amanda to
8 help you.

9 **A.** She was our contact point, so if we were to raise that
10 issue with her, she would be the contact point.

11 **Q.** Then finally this, effectively: tell the CCRC that they
12 must decide this before the civil matter, close it down
13 before the civil matter or get the criminal claimants
14 stayed.

15 That's a fair summary of bullet point 4, isn't it?

16 **A.** I -- it's not what -- well, bullet point 4 is, I think,
17 sufficiently summarised.

18 **Q.** You don't disagree, though, that that's what it is? You
19 know:

20 "... real danger that any delay in the CCRC
21 investigation will cause those claimants cases to be
22 stayed pending the result, ie the CCRC investigation may
23 hold up some of the civil case."

24 That's what you were trying to do. You were trying
25 to bring --

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1 **Q.** I put to you that you were trying to frustrate and bring
2 the CCRC proceedings to a close by any means possible;
3 do you disagree?

4 **A.** I do disagree.

5 **Q.** Let's have a look at the advice you receive. Number 1
6 bullet point:

7 "Push them on their jurisdiction to take this action
8 ... which was slightly tenuous at the start."

9 So challenge and push the CCRC on their
10 jurisdiction, correct?

11 **A.** That's been put forward as a possible area to develop,
12 yes.

13 **Q.** "Apply some political pressure [Business Innovation and
14 Skills]/MoJ."

15 The Ministry of Justice, the Secretary of State for
16 Business, Innovation and Skills, as was, you were going
17 to try, or at least that was the advice you received, to
18 get them to bully the CCRC, correct?

19 **A.** No, that's reading a lot into it.

20 **Q.** "Political pressure".

21 **A.** These are bullet points for discussion.

22 **Q.** Oh, I see, just to discuss:

23 "Tell the CCRC [this is number 3] that you are
24 coming under increasing pressure internally to know when
25 the CCRC is likely to have completed its findings -- Can

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1 **A.** Again, I think -- you're -- I don't agree with your
2 interpretation of these documents because they're trying
3 to import on to me things that -- it's just my -- where
4 I was, just weren't the case. If we go back to -- what
5 I'd said is I'd go on -- we'd had another request for
6 information from -- and I think this is what I said
7 yesterday on the same lines -- line of questioning --
8 we'd received another request for specific detailed, as
9 Mr Beer put to me, questions.

10 I thought it was time to -- and I said quite
11 thickly(?), "I'd like to start thinking about whether
12 and how we can force the issue", the key part is whether
13 and following that how, part of that is we'd be engaging
14 with the CCRC for quite some time and it struck me, off
15 the back of this -- and I checked my dates when I was
16 preparing my statement because think I was on my way
17 back from holiday to receive this -- this was an
18 opportune time, particularly in the summer break,
19 because it's August, I think -- are we approaching -- is
20 the approach we've been taking to date of cooperation,
21 support but leaving them to get on with it, is it the
22 right one? Let's kick the tyres and see if it is still
23 right and, to the best of my recollection, we did not
24 change that approach.

25 **Q.** You knew they were in disarray, didn't you?

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1 A. Who was "they" sorry?
 2 Q. The CCRC?
 3 A. I did not know that, no.
 4 Q. Let's go to page 2 of B/182. Amanda Pearce to you,
 5 bullet point 2:
 6 "We are trying to locate the transaction logs for
 7 the Misra case", et cetera, et cetera.
 8 Omit words.
 9 Let's go over to bullet point 2 on page 3:
 10 "We've seen a number of references to the 'Receipts
 11 and Payments Mismatch Problem' which we think has also
 12 been referred to as the Callendar Square/Falkirk
 13 problem."
 14 Well, they weren't right about that, were they?
 15 I mean, they were in complete disarray, weren't they?
 16 A. No, I --
 17 Q. Bullet point 3 --
 18 A. I can't speak for the CCRC and that was never my
 19 impression of them, no.
 20 Q. You knew from your position of knowledge that they were
 21 nowhere near being ready to determine these cases. You
 22 knew, from your knowledge, it's obvious from reading
 23 that, that they were not apprised of important
 24 information or had misunderstood important information.
 25 I want to come now to the *Seema Misra* case. I'm going

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1 et cetera.
 2 So, again, you knew, certainly no later than the
 3 1 July, that Gareth Jenkins was absolutely instrumental.
 4 Now, it's fair to say, isn't it, that, even without
 5 this email, the *Misra* and *Castleton* cases were of
 6 interest to Second Sight and anything of interest to
 7 Second Sight was of interest to you, correct?
 8 A. I can't speak for Second Sight and I don't know if "you"
 9 as me personally or "you" Post Office because there
 10 might be a different answer. Can you ask me the
 11 question again, sorry?
 12 Q. Don't worry.
 13 Do you remember yesterday saying that it was
 14 important to keep things under review?
 15 A. Yes, I think -- I said it.
 16 Q. Because your role involved detail, didn't it, distilling
 17 and appreciating the significance of information you
 18 received?
 19 A. Certainly distilling, detail sometimes, yes, sometimes
 20 no.
 21 Q. You can't distil something without appreciating it, can
 22 you, because, of course, distilling something means you
 23 have to comprehend it and reduce it to *précis*?
 24 A. Hopefully, yes.
 25 Q. Exactly. Now, you'd read the advice of Simon Clarke

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1 to ask you to confirm that you were aware of that case
 2 and Gareth Jenkins' part in it from a very early stage,
 3 weren't you?
 4 A. Yes.
 5 Q. In fact, on 1 July 2013, you were aware that Gareth
 6 Jenkins was a witness in Seema Misra's trial because
 7 Jarnail Singh had sent an email to you and to Hugh
 8 Flemington.
 9 A. Could -- are you going to ask me a question on that
 10 email?
 11 Q. Well, if you want to see it, I'll put it to you. It's
 12 POL00031352. You won't have it in your bundle but you
 13 will be able to see it in much larger font on the
 14 screen.
 15 A. I think this is in my bundle. It looks -- ah, yes.
 16 Yes, I have seen it.
 17 Q. So 1 July 2013, paragraph 3:
 18 "We instructed our own expert, Gareth Jenkins, from
 19 Fujitsu. This was a turning point in the case",
 20 et cetera, et cetera.
 21 Paragraph 4:
 22 "... Professor McLachlan conceded that all of the
 23 theoretical problems he had raised were now irrelevant.
 24 He abandoned most of his theories after being assisted
 25 to a better understanding by Mr Jenkins", et cetera,

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1 dated 15 July regarding Gareth Jenkins, the very same
 2 day it was written, didn't you?
 3 A. It was certainly around the same time, it would have
 4 been fairly close to it. I don't remember precisely but
 5 when --
 6 Q. It was apocalyptic, wasn't it? I mean, you knew that he
 7 was a fatally discredited witness, who was a key witness
 8 for the Post Office in numerous cases and that this
 9 would have a profound impact on historic prosecutions.
 10 You knew all of that.
 11 A. Well, I knew the advice, yes.
 12 Q. Right. So you knew by 15 July that he was a liar, that
 13 he failed in his duty to the court and that he was
 14 bankrupt credibility. Is that why you, on the 22 July,
 15 were concerned about a holding letter to the CCRC -- so
 16 a week later, a holding letter to the CCRC and also
 17 notifying the Post Office's insurers?
 18 A. Sorry, 22 July of which year?
 19 Q. A week after you'd read that advice --
 20 A. A week, sorry. So '13, yes.
 21 Q. A week after you'd read that advice, you were concerned
 22 about drafting a holding letter to the CCRC and also you
 23 were concerned in relation to the question of
 24 notification to the Post Office's insurers. You must
 25 remember that?

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1 A. Sorry, I remember the second bit. I'm sorry you're
 2 taking me to documents in time -- and I've looked at
 3 a lot over a long period in the last few days and I'm
 4 struggling to follow and I am sorry for that but I am
 5 trying to follow you. Can you break it -- break it down
 6 a bit?
 7 Q. I don't need to take you to the document it's a matter
 8 of record. I'm just going to come back to the Clarke
 9 Advice.
 10 A. Okay, thank you.
 11 Q. The Clarke Advice, did it not strike you that Seema
 12 Misra's solicitor should be informed immediately?
 13 A. No, I -- I think that was the very first engagement I'd
 14 had with the criminal law process, let alone specific
 15 cases. But there are criminal lawyers looking at these
 16 matters and advising the company. That wouldn't have
 17 been my role.
 18 Q. Look, let's please not dissemble. We know from your
 19 handwritten documents of your discussion with Martin
 20 Smith, dated 2 September 2013, your E/96, that you must
 21 have had carriage of this because, otherwise, you would
 22 not be discussing the matter with Martin Smith.
 23 A. The heading of the note is that the only piece of
 24 carriage I had was how Post Office would engage with
 25 Fujitsu over that. That was my carriage of this. I'm

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1 A. Yeah, I have a funny feeling that's probably missing
 2 a question mark because Lesley didn't come to any
 3 conferences or consultations with Brian, as far as
 4 I remember it.
 5 Q. So I suggest to you that you didn't just read the Clarke
 6 advice and put it away, that you were involved in
 7 dealing with the fallout?
 8 A. Yes, I helped Post Office manage it, as part of a number
 9 of people. I'd hope I'd been clear about that.
 10 Q. Part of that fallout of course was drafting a letter
 11 before claim, wasn't it?
 12 A. I can't remember whether I drafted it. That was
 13 something that was drafted, yes.
 14 Q. Was that letter before claim sent?
 15 A. I don't believe so, no.
 16 Q. You don't believe so --
 17 A. In fact, I do not believe it was sent.
 18 Q. You don't believe it was sent?
 19 A. If that's clear.
 20 Q. Can we go to that letter before action, POL00140620, at
 21 your E/77.
 22 A. Thank you, sir.
 23 Q. Can we go a little bit further up, please, and over --
 24 a little bit further up. A little bit further up.
 25 Right. Do you see, just above "Fujitsu's

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1 not a criminal lawyer. I couldn't comment on what to do
 2 with that.
 3 Q. That note, I suggest, which is your E/96, POL00155555,
 4 obviously and completely undermines your suggestion that
 5 this was nothing to do with you and that it was all to
 6 do with the criminal lawyers?
 7 A. In terms of giving criminal advice to the company on
 8 what to do in response to the Second Sight Report, I do
 9 not believe I gave any advice to the company.
 10 Q. You had liaison with Brian Altman, didn't you?
 11 A. I attended conferences with him and then later on
 12 I had -- I would say liaison, yes.
 13 Q. Can we scroll up please, can we scroll up. I want to --
 14 sorry, if we could scroll up so we can see further down
 15 in the notes and further down, please, further down, and
 16 further down, and further down.
 17 Do you see that, "LS to come to BAQC"; is that Legal
 18 Services.
 19 A. I think that's Lesley Sewell, who was the Chief
 20 Information Officer.
 21 Q. I see, right. So you were involved in relation to that?
 22 A. I don't know what the "that" is. I don't believe Lesley
 23 came to the conference --
 24 Q. Well, arranging the consultation with Mr Altman with the
 25 Chief Information Officer.

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1 obligations" -- you drafted this letter?
 2 A. From the font, it looks like a Womble Bond Dickinson
 3 produced document, a Bond Dickinson piece, so --
 4 Q. So Bond Dickinson did?
 5 A. I don't know but it looks like their format, and I think
 6 they did. I think they did, yes.
 7 Q. Was there a little bit -- I mean, I know that it wasn't
 8 sent but was there a little bit of a puff:
 9 "In a number of cases, Post Office has now been
 10 forced to stop prosecutions [correct] and notify these
 11 disclosure failures to Defence Counsel in cases where
 12 subpostmasters have already been convicted."
 13 You would have known that that wasn't the truth,
 14 wouldn't you?
 15 A. I'm sorry, which part?
 16 Q. "... and notify these disclosure failures to Defence
 17 Counsel in cases where subpostmasters have already been
 18 convicted."
 19 A. Looking at that, I think that reflects what I've
 20 understood to be going on with Cartwright King's review
 21 of past prosecutions.
 22 Q. It's suggesting that people have already been contacted.
 23 That was not accurate.
 24 A. If it was saying at this time that people had already
 25 been convict -- sorry, contacted, then that probably

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1 would not be correct but this is a draft and then it's
 2 referring to Post Office's actions, so --
 3 **Q.** Thank you.
 4 **A.** Okay.
 5 **Q.** Can we go to your E/89, please. This is POL00152451.
 6 **A.** Yes.
 7 **Q.** You can see, in the second paragraph, the "Misra
 8 'angle'", and this is 26 June 2015:
 9 "... could be whether proper disclosure of Horizon
 10 bugs was made to Professor McLachlan ..."
 11 It wasn't just that, was it? It was to do with the
 12 fact that a perjuring witness had given critical
 13 evidence in her trial and you knew she hadn't had a fair
 14 trial.
 15 **A.** Again, I don't know about the fairness of her trial.
 16 That's not a matter -- I think this document probably
 17 relates to the Panorama programme, when we were trying
 18 to understand what might be contained in the broadcast
 19 and, hence, what Post Office might wish to be alive to
 20 as an issue and what it might want to do as a response
 21 to it. So it's --
 22 **Q.** Can I go now, please, to your E/111, and it is
 23 POL00243328.
 24 **A.** I have it. Thank you.
 25 **SIR WYN WILLIAMS:** Just to let you know, Mr Henry, we are
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1 **Q.** What about your personal responsibility, rather than
 2 saying "This is nothing to do with me, it's to do with
 3 the Criminal Law Team", what about your personal
 4 responsibility? You refer to this on page 1 of the
 5 document as a "wee beauty" that you can use to advance
 6 the Post Office's --
 7 **A.** In terms of my personal responsibility, at some point --
 8 and, again, I'm -- I can't -- there's -- I think there
 9 are emails in my bundle or somewhere on this -- at some
 10 point -- in fact, it was a subject of one of the Rule 9
 11 requests -- I expressed that I was uncomfortable
 12 about -- it became clear to me at some point in this,
 13 and I think it was probably around the time of the
 14 Panorama, that the receipts and payments mismatch bug
 15 was in play during the course of Mrs Misra's trial.
 16 I didn't know in the context of criminal proceedings,
 17 what that meant but I sought some advice on it.
 18 So you're asking me of personal responsibility,
 19 I said I felt uncomfortable but, again, in the context
 20 of criminal proceedings, I don't know what to do.
 21 **Q.** So you delegated it to Cartwright King and to Mr Altman?
 22 **A.** I think, initially -- I wouldn't say "delegate".
 23 I think -- I'd asked them -- I'd asked them -- "Here's
 24 an issue, what do we do?" I think there's a request for
 25 advice.

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1 getting close to the 45 minutes, all right.
 2 **MR HENRY:** Thank you, sir.
 3 This is another email where, at paragraph 11 of the
 4 bullet points from Jarnail Singh, which you were aware
 5 of, from 11 June 2014, again, about Gareth Jenkins being
 6 the turning point -- and at paragraph 20 of this note,
 7 paragraph 20, please, page 4, it says, last sentence:
 8 "I can say is that both sides in *Misra* were
 9 completely beholden to Gareth Jenkins and his deep
 10 knowledge of Horizon."
 11 Can you explain, in those circumstances, you knowing
 12 of that from 2014 and you actually digging it out on
 13 20 July 2016, because we can see that from page 1 of the
 14 document, why Mrs Misra's team, Mrs Misra's lawyers,
 15 weren't informed of that as soon as you read that?
 16 **A.** Well, the email goes back to 2014, I think, at which
 17 point the review as appropriate of past convictions for
 18 safety was being undertaken by the lawyers. It looks
 19 like I brought this up in connection with the Mediation
 20 Scheme, and a case of M012, which I suspect was the
 21 number given to Mrs Misra's application to the scheme,
 22 and I was forwarding it to members of the scheme team as
 23 a summary of some of the criminal law assessment of --
 24 in fact, it's back in '12, so even Rose -- this was all
 25 generated in connection with --
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1 **Q.** Mrs Misra's conviction was eventually quashed in April
 2 2021, ten and a half years after she had been wrongly
 3 convicted. You were personally aware of information
 4 sufficient to quash her conviction from July '13,
 5 weren't you?
 6 **A.** I had information, whether it was sufficient to quash or
 7 not, I keep saying I don't know.
 8 **Q.** You had all the information that was deployed in her
 9 appeal on her behalf from 2016 because of the Second
 10 Sight review and Tim McCormack's Freedom of Information
 11 request?
 12 **A.** Again, I don't know whether I had all the information or
 13 not and you're referring to documents that I can't --
 14 I can't see.
 15 **Q.** So I want to come, finally, and this is my last question
 16 sir, to E/111 and this POL00243328.
 17 **A.** B/111?
 18 **Q.** Yes. It's your E/111.
 19 **A.** I have the document, thank you.
 20 **Q.** Again, could we go to page 8 of your E/111.
 21 **A.** Yes.
 22 **Q.** This is you in 2014, 11 June 2014, and you're still, as
 23 it were, asking your Comms Team to do a little bit more
 24 "to help them tell our side of the story". You want
 25 more information from Jarnail Singh to help the Comms
 100

1 Team tell your side of the story. What was your side of
 2 the story, Mr Williams?
 3 **A.** Well, the -- what Post Office's position on the -- on
 4 the prosecution of Seema Misra was at that time.
 5 **Q.** It was all to do with spin and nothing to do with the
 6 fact that this woman had been wrongly sent to prison;
 7 isn't that the truth of it?
 8 **A.** Well, this email is sent to the Comms Team, so it is for
 9 a communications exercise. That's what that email seems
 10 to be connected with. I'm trying to join the criminal
 11 lawyers up with the Communications Team, so that
 12 a communication can be crafted, for whatever purpose.
 13 **Q.** What about the substance: a wrongly convicted woman?
 14 What about that, Mr Williams?
 15 **A.** What specifically about that? I can say I take no
 16 pride, comfort or confidence in having worked for
 17 an employer that engaged in conducting the greatest
 18 miscarriage of justice that we've seen, however it's
 19 been described. I've -- it's never been -- I don't know
 20 where to go with this -- it's awful that people with
 21 convictions had them for the length of time -- had them,
 22 and then had them for the length of time they did and,
 23 for my part in that, you know, I'm -- as I say, I'm --
 24 I'm truly sorry. You know, that I've been associated
 25 with this, I think, is, you know, I'm -- I'm truly sorry

1 **SIR WYN WILLIAMS:** Good afternoon Mr Jacobs. If you haven't
 2 finished by 2.45, I will give you a few minutes warning
 3 as I did with Mr Henry, all right?

Questioned by MR JACOBS

5 **MR JACOBS:** Thank you, sir, yes.
 6 Good afternoon, I represent 157 subpostmasters, all
 7 of whom were affected by this scandal, and a large
 8 number of them were involved in the Group Litigation,
 9 which I know you were closely involved with; is that
 10 right?
 11 **A.** That is.
 12 **Q.** I want to ask you, firstly, about suspense accounts?
 13 **A.** I'm sorry just before you start would it be possible to
 14 move the microphone, I literally lose the -- I can't see
 15 your face.
 16 **Q.** Okay, I have someone saying they can't hear me and
 17 someone saying they can't hear me. I'll carry on.
 18 I want to ask you about suspense accounts and you
 19 deal with that at 129 and 130 of your statement, which
 20 is your bundle reference A/2 -- we don't need to turn it
 21 up -- but if we can look at your B/141, which is
 22 POL00021762, Mr Williams. If we could have that on the
 23 screen, please. If we could go to the request of Second
 24 Sight, which is on page 3 of that document, it reads:
 25 "In the light of the disclosure of rolling 3 year

1 for that.
 2 **MR HENRY:** You weren't associated with it, Mr Williams. You
 3 were in the middle of the web and you were part of it.
 4 Thank you, sir.
 5 **SIR WYN WILLIAMS:** Thank you, Mr Henry.
 6 I think the point, Mr Williams, is that at a moment
 7 in time, namely 2014, when, on any sensible reading of
 8 Mr Clarke's advice of July 2013, there was a problem
 9 about Mr Jenkins' evidence, the Post Office and you
 10 personally appeared still to be asserting to the world
 11 that the conviction was safe, amongst other things,
 12 because expert evidence had been called and the jury, by
 13 inference, must have accepted it; and those two things
 14 don't sit very easily together, do they?
 15 **A.** No, they don't, sir. No, they don't.
 16 **SIR WYN WILLIAMS:** Right. Thank you.
 17 Then we'll adjourn now until 2.00 and we'll have
 18 questions from Mr Jacobs.
 19 **MR BEER:** Thank you, sir.
 20 **(12.56 pm)**
 21 **(The Short Adjournment)**
 22 **(1.59 pm)**
 23 **MR BEER:** Sir, good afternoon, can you see and hear us?
 24 **SIR WYN WILLIAMS:** Yes, I can, thank you.
 25 **MR BEER:** Over to Mr Jacobs, I think.

1 suspense ..."
 2 Maybe we need to scroll down a little. Are you on
 3 page 3?
 4 **A.** I'm sorry. I have it. I have it in my hard copy, if
 5 that helps.
 6 **Q.** Scroll down, please. Here we are. So it's 30 July
 7 2014, 13.25 and it's from Ian Henderson to Belinda
 8 Crowe, copying in Ron Warrington and Angela van den
 9 Bogerd, and others. He says:
 10 "In the light of the disclosure of rolling 3 year
 11 suspense account can we have details of month end
 12 balances for this account [this was in relation to
 13 a particular case] for the last 3 years together with
 14 details of amounts released to P&L", which is profit and
 15 loss, isn't it?
 16 **A.** That's my understanding of it.
 17 **Q.** So, essentially, Second Sight wanted to know whether the
 18 monies that subpostmasters had paid on account of
 19 Horizon shortfalls had been held in suspense accounts
 20 and then transferred to Post Office profit and loss
 21 accounts?
 22 **A.** I'm not sure what the particular line of the enquiry
 23 was, but it was certainly the transfer of agency monies
 24 into a suspense account.
 25 **Q.** Then if we could go, please, to what Belinda Crowe said

1 at -- on 1 August, which is at page -- sorry, if we
2 could then go up to Andrew Parsons' suggested response,
3 which is also on page 3 of 5, I think we're there, he
4 says:

5 "Belinda, Angela

6 "As discussed briefly yesterday, I suspect that the
7 information requested by Ian below is highly
8 [commercially] sensitive.

9 "It may also be that the figures in question are
10 quite high and this may then be portrayed as if there
11 are significant sums each month that cannot be
12 reconciled within [Post Office Limited's] accounts."

13 So significant sums coming from postmasters that
14 can't be reconciled with the general accounts coming in
15 to the Post Office Accounts.

16 Then:

17 "The inference from this is that [Post Office's]
18 processes/accounting systems are flawed given the volume
19 of discrepancies. Whether or not this is correct, it is
20 an easy leap to make.

21 "Assuming that POL finance say that this info cannot
22 be disclosed, I've penned a short response to Ian
23 below."

24 Then, if we read below, he says:

25 "Ian the information you are seeking is highly
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1 up to page 2, please. This is Belinda Crowe writing
2 an email, saying that they didn't want to provide
3 a ballpark figure:

4 "However, Andy Parsons has sketched out a suggested
5 response below. I do not know whether the published
6 accounts give any details or whether we do ever make
7 this information otherwise available but I would be for
8 advice on how best to respond.

9 "I think that we should consider this through the
10 lens of an FOI request and how we would respond to
11 that."

12 She goes on to say in the last paragraph:

13 "Second Sight are producing a draft report either
14 today or tomorrow which is likely to reference this so
15 we will need to have a response within the next couple
16 of days."

17 So moving on to your input in this. So if we go to
18 page 1 of 5, this is what you say about the issue. So
19 scrolling down please, you say:

20 "Belinda, I agree with Andy -- I'd like to avoid
21 giving anything if at all possible (less is more), but
22 if we do, rather than give them the data they've asked
23 for, we should provide MI ..."

24 I don't know what that means. Is that minimum
25 information, minimum input?
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1 commercially sensitive and therefore would only be made
2 available in exceptional circumstances.

3 "As described in the Suspense Account Note provided
4 to you, sums in POL suspense account do not impact on
5 branch accounting but reflect unresolved matters between
6 POL and its clients. I'd be grateful if you could
7 explain why [Second Sight] need visibility of suspense
8 account figures given that the Part 2 Report and CRRs
9 are only focused on the impact on [subpostmasters].

10 "Kind regards

11 "Andy."

12 What he's doing, effectively, do you agree, is he's
13 deflecting that question. He doesn't want to give that
14 information, he says it's commercially sensitive and
15 he's saying, "Why are you asking this?"

16 **A.** There's just one thing I think you said in it which was
17 this was money coming from postmasters. I also think
18 the suspense accounts involved monies and exchanges with
19 Post Office clients, so it wasn't just postmaster money
20 but it may have been postmaster -- sorry, postmasters
21 were certainly involved but not exclusively and I heard
22 you to sort of read that in. So "deflect" is --
23 I think, yes, it is a word but I actually say more
24 appropriately "clarify".

25 **Q.** Well, we're going to come to your response so we'll move
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1 **A.** Management information.

2 **Q.** "... which gives context, [including]:

3 "Rather than raw three year data, give the monthly
4 average over the past [three and a half] years;

5 "What that figure is as a proportion of total month
6 end transactions; and

7 "average time to clear sums in suspense

8 "eg something along these lines", then you give what
9 is a very vague suggested response:

10 "The amount held in suspense accounts across the
11 Post Office Network averages £XX per Trading Period or
12 approximately Y% of the total value of the transactions
13 processed each Trading Period. Of the sums held in
14 suspense accounts, approximately Z% is cleared within
15 30 days and all but F% is cleared within 90 days'."

16 So that's your response, Mr Williams.

17 **A.** Yes.

18 **Q.** It's right, isn't it, and our clients who are alive to
19 this issue all say, that Post Office did not want this
20 information to get out, they did not want
21 subpostmasters, they did not want the Working Group,
22 they did not want MPs to know where the subpostmasters'
23 money that Post Office was taking from them was going;
24 that's right, isn't it?

25 **A.** Well, I don't know what your clients have been saying to
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1 you. I wasn't -- I wasn't -- sorry, I was aware there
2 was a question, like, you know, "If it's gone missing,
3 could it have gone somewhere", and the suspense accounts
4 were a place for that. I --

5 **Q.** Right, well, that's helpful --

6 **A.** I know that from the Post Office side of things.

7 **Q.** That's helpful. We can take the document down now
8 please.

9 So what other people have said about this issue.
10 Sir Anthony Hooper gave evidence on 10 April. We don't
11 need to turn up the transcript but, for the record, it's
12 page 185 of the transcript, and he's talking about the
13 Working Group. He said:

14 "I couldn't understand where the money had gone. If
15 a subpostmaster found a loss of £2,000 and paid it out
16 of his own pocket, which they did, or if it was taken
17 out of future income, where had the money gone?"

18 He went on:

19 "So I asked towards the end of 2014 for suspense
20 accounts because I thought that -- I knew there were
21 suspense accounts. I knew that Post Office, after three
22 years, took out the profits of the suspense account and
23 I wanted to know more about it."

24 Then this is what he said, he said:

25 "I got absolutely nowhere and nor did Second Sight."
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1 know about it?

2 **A.** Well, to that level you've described it, I don't recall.
3 I was a lawyer working on it, as a reminder but -- and
4 I was aware that suspense accounts was an issue but
5 I hadn't realised the prominence that Sir Anthony Hooper
6 was placing on it.

7 **Q.** If money is being paid by subpostmasters theoretically
8 to balance a shortfall, how would that money -- that
9 couldn't ever be represented in the accounts as
10 a profit, could it, that would be fraudulent, wouldn't
11 it?

12 **A.** I'm not an accountant, I can't describe what could or
13 couldn't be doing with the accounts, sorry.

14 **Q.** All right. Well, I'll ask you these questions, you may
15 or may not be able to answer them. Did you consider
16 that the Post Office had acted fraudulently or
17 improperly in converting monies extracted from
18 subpostmasters, on account of Horizon shortfalls, into
19 profit by putting it into the profit and loss account?

20 **A.** I can't comment on it.

21 **Q.** All right. So you don't know how much, how many
22 thousands and thousands of pounds the Post Office
23 profits increased as a consequence of money that they'd
24 been extorting from subpostmasters?

25 **A.** I can't comment on these areas, sorry.
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1 So my question to you is: were you aware, and I know
2 you were involved in the Mediation Scheme and the
3 Working Group, were you aware that the Chair of the
4 Working Group had been repeatedly asking for the
5 suspense account so that he could track where the money
6 had gone and that Post Office never gave this
7 information?

8 **A.** So two bits, I was involved in the scheme, as and when
9 the scheme required me. I don't recall actively
10 participating in Working Group discussions and I think
11 I said in my statement I recall only attending one
12 in-person meeting and I did attend some calls. I say
13 that because you said I was involved in the Working
14 Group and I would not describe myself as having been
15 involved in that.

16 **Q.** Okay.

17 **A.** Which leads me to the answer to the question, which
18 I did understand, is that, I have to say, feels like
19 news to me, that Sir Anthony Hooper had been asking for
20 it in that context, that extent. I don't doubt that is
21 the case, but I wasn't aware of it.

22 **Q.** So you were a lawyer advising on the Mediation Scheme
23 when this request was being repeatedly made, which the
24 Chair of the Working Group has told this Inquiry, and
25 your evidence is that this is news to you and you didn't
110

1 **Q.** Can you comment on whether any Post Office Directors
2 questioned these accounts because of all these figures
3 turning up that were unexplained?

4 **A.** I've no visibility on that, sorry.

5 **Q.** All right, you have referred in your witness statement,
6 I think at paragraph 130, to an end-of-term report and
7 perhaps we could actually look at that. It is your
8 B/55. It's dated, I think, 30 July 2014, and the
9 reference number is POL00040935, and paragraph 55,
10 please?

11 **A.** I'm sorry, I missed it.

12 **Q.** It's your B/55.

13 **A.** I'm sure you did give me it but I'm sorry, I missed it.
14 B/55?

15 **Q.** Yes. So if we go to page 15 of 187 of this.

16 **A.** I'm struggling to keep more than one number in my head,
17 sorry.

18 **Q.** Thank you.

19 **A.** I have to it. Thank you.

20 **Q.** So suspense account data:

21 "In June 2014, Second Sight asked the Post Office to
22 explain the operation of its suspense account. The Post
23 Office replied to that request in a written paper in
24 July 2014. Second Sight then made a request for further
25 data on the accounting entries being posted to the
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1 suspense account. Given that the purpose of this
2 request was unclear [and we would say not unclear],
3 Second Sight agreed to provide further clarity on the
4 nature of the enquiry, which they did in October 2014.
5 Following some residual uncertainty over the focus and
6 purpose of the request, the Post Office sent a further
7 written paper to Second Sight explaining the operation
8 of its suspense account."

9 Then 54:

10 "Whilst the Post Office acknowledges it originally
11 took longer to respond to Second Sight's initial
12 requests than it would have wished, it was able to
13 answer Second Sight's questions when a shared
14 understanding of the nature of the enquiry had been
15 reached.

16 "55. Post Office's Chief Financial Officer now had
17 two meetings with Second Sight to discuss these matters
18 and has provided Second Sight with further 'contextual
19 data'. At the most recent meeting, Second Sight agreed
20 that it needed no further information on the Suspense
21 Account, requesting some further data on another aspect
22 of client accounts to provide additional reassurance."

23 I hope I haven't gone too quickly.

24 So it's right, isn't it, that Post Office never
25 provided Second Sight and never provided Sir Anthony

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1 accounts, that would demonstrate, wouldn't it, to you,
2 someone investigating these subpostmaster complaints or
3 looking into the legal aspects of it, that there was
4 a problem with the system?

5 **A.** I think that's an -- starter for ten on what you
6 described, which was, with respect, very quick and
7 I might ask you to slow down.

8 **Q.** I'm conscious of the time but I will --

9 **A.** I'm conscious as well, so I'm sorry. That's a question
10 for -- sitting on what you've just described, I'd say
11 that's a question for a forensic accountant. And then
12 if I was a legal adviser I would try to understand what
13 those findings might be. Movements of money, I'm not
14 very good with, I'm sorry.

15 **Q.** But you were quite good with resolving the Horizon
16 issues and dealing with the press. Isn't it quite
17 an obvious point, really, Mr Williams?

18 **A.** Sorry, what -- which point is obvious?

19 **Q.** That you would be able to tell from the accounts whether
20 there was a problem with the system or not?

21 **A.** I think it became one of the -- you know, it's sort of
22 part of the -- I think part of the sort of response to
23 the challenges about the system and why it was operating
24 well most of the time is it didn't just balance against
25 postmaster branch accounts but Post Office sells most of

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1 Hooper with details of where the monies from
2 subpostmasters from the suspense account actually ended
3 up?

4 **A.** I don't know what was passed on that, I didn't have --
5 I don't recall -- I certainly don't recall don't having
6 any sight of what was or wasn't presented or considered
7 or given on suspense accounts, I'm sorry.

8 **Q.** Do you know where this money would have been held, where
9 the accounts were? Were they in Chesterfield?

10 **A.** Certain finance functions were in Chesterfield but
11 I don't know what the split between sites was.

12 **Q.** All right. Now, this is a question that I think you
13 might be able to answer: did it occur to you or anyone
14 else that the money being held in suspense, the amount
15 of and the frequency of payments, would be an indicator
16 of issues within the Horizon system?

17 **A.** No, I don't recall that connection being discussed.

18 **Q.** Because, you see, if this was a balancing error and the
19 system was out and the subpostmaster put the money in
20 because the money needed to be put in because there was
21 an actual, a real shortfall, then there wouldn't be
22 anything in the suspense account; it would balance,
23 wouldn't it?

24 If there were huge unexplained sums of money,
25 hundreds of thousands of pounds pouring into these

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1 its products for other parties, so those accounts then
2 needed to back off against their systems, and so, when
3 they're balancing, there's balancing. So that's
4 probably as far as I can take -- and I hope it's not off
5 track. As I say, I'm not an accountant.

6 **Q.** I've asked you the questions and we note your answers,
7 Mr --

8 So I'm going to move on to another topic now, which
9 is the Group Litigation. Can we go to another document,
10 please, which is POL00089708.

11 **A.** Can I have the bundle?

12 **Q.** It's your E/46.

13 **A.** Thank you.

14 **Q.** If we could go to page 2 of that, these are lists of
15 various committees. I'll wait for you to find the
16 document. We can see at 2 "GLO/Postmaster Litigation
17 Subcommittee".

18 **A.** Yes.

19 **Q.** "GLO/Postmaster Litigation Subcommittee". You say -- no
20 need to turn it up for now -- but at paragraph 190 of
21 your statement, you say in April 2016, because of the
22 issues in the original claim form in the Group
23 Litigation, you suggested yourself to Post Office's
24 General Counsel that a steering group be set up for that
25 purpose. So you suggested steering group for the

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1 litigation and you were on it, and these are the members
2 of it.

3 **A.** No, that's not correct. This is the Board subcommittee.
4 **Q.** Right.

5 **A.** So I set up a steering group, which was -- which were --
6 managers within the business.

7 **Q.** So that's helpful so what was the difference, then,
8 between the steering group and the litigation
9 subcommittee?

10 **A.** I thought I tried to explain that in my statement. In
11 the early phases of the litigation, most instructions,
12 management oversight from within the company was managed
13 through the steering group, which were executives --
14 I think, the Chair was a colleague called Tom Moran --
15 with a view that they would be able to respond, help the
16 business respond to the allegations, give instructions
17 to external lawyers, and the like, and then that
18 committee could report to the Group Executive, which
19 were the senior management -- most senior management,
20 I should say. So the C-suite and related colleagues,
21 and then reporting to the Board would be however that
22 fitted within the Group Exec, or GE, and the Board.

23 So the second bit, at a stage -- I think I put this
24 somewhere in my statement -- at some stage and I think
25 it may have been 2018, which will be consistent with

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1 please, that you are there, as well, Rodric Williams?
2 **A.** Yes.

3 **Q.** You are on the steering group as well, weren't you?
4 **A.** The steering group, yes.

5 **Q.** Okay. I'm going to read you from paragraph 108 of Alan
6 Bates' witness statement -- we don't need to turn it
7 up -- but this is the point we're going to be talking
8 about. He said, and he confirmed this in his evidence
9 on 9 April:

10 "It is public knowledge that Post Office knew we had
11 funding for the litigation. They will have known we had
12 access to a finite pot of money and the harder they
13 fought, the more that funding would be depleted. In my
14 opinion, this was a very cynical approach. The steering
15 group and I were advised by leading council and Freeths
16 that it was in the best interests of the claimant group
17 as a whole to settle the proceedings at the time. Post
18 Office had effectively outspend the 555 claimants and
19 the risks of continuing with any litigation without
20 adequate funding and possibly without ATE insurance was
21 not a risk which any of the claimants should have taken,
22 given that they'd suffered so much already at the hands
23 of POL [Post Office Limited]."

24 In his oral evidence, Mr Bates said it was very,
25 very obvious the Post Office had a strategy of trying to

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1 this document, which, I have to say, I haven't seen
2 before, the Board decided they wanted to spend more time
3 or give more focus -- this what I understand, the Board
4 wanted greater focus on the litigation and set up
5 a subcommittee, so that it could receive more direct,
6 I guess, feedback on the direction of travel and status
7 of the litigation, typically done the day before a full
8 Board meeting, so that the subcommittee's knowledge
9 could be taken forward into the wider meeting without
10 taking up the full Board meeting, which I understand it
11 was taking up more time for the Board than they had
12 available.

13 **Q.** Okay.

14 **A.** Bearing in mind there were other considerations.

15 **Q.** That's helpful. If we scroll down, we can see, I think,
16 that you were on the litigation subcommittee, you're
17 there at number 9 in 2018.

18 **A.** I wouldn't have said I was a formal member. I don't
19 know this document. I don't know who prepared it or
20 where the names came from but I certainly did attend
21 some meetings of it and then I think, certainly later,
22 at least after, I think, the Common Issues judgment came
23 down, I started attending the meetings regularly.

24 **Q.** Well, we can see the names. If we scroll down to 2019,
25 you can see at number 9 scrolling down a bit more,

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1 force the claimants, who were winning the litigation, to
2 settle and abandon their case, abandon their claims
3 because they had run out of money.

4 Before I ask you a question about that, I want to
5 turn to another document, which is POL00006380, and
6 that's your B/234.

7 **A.** My B/234.

8 **Q.** These are steering group meeting notes of 11 September
9 2017. Thank you. If we go down to page 2 of 15, you'll
10 see "Overall Post Office Strategy".

11 **A.** Sorry, again, you're going again very, very quickly and
12 I would just like to say, in case it helps, and I'm
13 sorry if I'm interrupting, I didn't see Alan Bates'
14 evidence and I haven't read his statement, so I am --

15 **Q.** No doubt you'll take it from me what he said --

16 **A.** I'm sure it was but if there were parts of it that I'll
17 need to be taken back to --

18 **Q.** Let's look at paragraph 4.3, shall we?

19 **A.** I'm sorry, you'll have to take me back. Which tab,
20 which page?

21 **Q.** It's your B/234.

22 **A.** Thank you, and the page?

23 **Q.** Page 2, paragraph 4.3. It's on the screen, if you'd
24 rather look at the screen, Mr Williams?

25 **A.** Yes, I have that, thank you.

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1 **Q.** "We believe the better solution is to try to force the
2 Claimants into a collective position where they will
3 either abandon the claims or seek a reasonable
4 settlement. It should be remembered that the claims are
5 financially supported by Freeths (whose fees are at
6 least partially conditional on winning), a third party
7 funder and insurers. Without this support these
8 proceedings would not have been possible. All three
9 entities will likely have the power to pull their
10 support if the merits of the case drop below a certain
11 level. Our target audience is therefore Freeths, the
12 funder and the insurers, who will adopt a cold logical
13 assessment of whether they will get a payout, rather
14 than the Claimants who may wish to fight on principle,
15 regardless of merit."

16 I know this is couched in terms of merits but it is
17 right to say, isn't it, that Post Office were targeting
18 the pockets of the funder, the insurers and the lawyers?

19 **A.** No, I don't think that's right. I do not recall that
20 being -- sorry, sorry, no, I don't.

21 **Q.** Okay, you were on this --

22 **A.** Yes.

23 **Q.** -- steering group, weren't you?

24 **A.** Yes.

25 **Q.** This is part of the Post Office overall strategy, isn't

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1 "Stretch out the litigation process so as to
2 increase costs in the hope that the Claimants, and more
3 particularly their litigation funder, decide that it is
4 too costly to pursue the litigation and give up."

5 Now, the question I have for you, very simply, is
6 that is exactly what happened, isn't it, Mr Williams;
7 exactly what happened?

8 **A.** No, it's not.

9 **Q.** Why do you say that the postmasters and Mr Bates, when
10 they say that is exactly what happened, are wrong?

11 **A.** Because one, funding was never anything we had
12 visibility of, we had -- security for costs application
13 was made, which gave some insight into it but not the
14 details but, mostly, the case management directions for
15 the conduct of the litigation provided for clearly
16 defined steps, for at least the first two trials, in
17 a very short period of time, and cost budgeting, which
18 were agreed, so the parties costs were known and
19 understood as we went through. That's my understanding
20 of it. And that's -- and also, personally, that's how
21 I recall us conducting the litigation.

22 **Q.** All of my 157 clients and no doubt Mr Bates would say
23 collectively that is not true, Mr Williams.

24 **A.** It's -- I'm sorry but I've given my evidence.

25 **Q.** Very well. We'll move on to another document which is

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1 it?

2 **A.** Well, it's a recommendation that was drafted, so
3 I think, again in my statement, I said we -- we'd asked
4 Bond Dickinson to draft discussion papers, working
5 papers -- I forget the full description of them, for the
6 steering group to read and consider, so that decisions
7 on both overall strategy but also certain specific items
8 could be deliberately made. Again, in my statement,
9 funding was part of that but it was never the -- starter
10 for ten, we didn't know what funding was available.

11 **Q.** I'll move on. Let's have a look at another document,
12 shall we. POL00006379. You deal with this in your
13 witness statement as well and it's your B/235?

14 **A.** Thank you.

15 **Q.** This is a Bond Dickinson document which also deals
16 with -- oh, sorry, it's some more steering group
17 meetings.

18 **A.** I think this was an appendix to the previous document,
19 I think.

20 **Q.** If we could go down to section 5, please, so scroll
21 down. These are all the options that were considered.
22 If we stop there, please. This wasn't a recommended
23 option but my clients say, Mr Bates has said, this is
24 what ultimately prevailed in terms of the strategy. So
25 I'll read out what the attrition strategy was:

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1 a letter -- again you deal with it in your witness
2 statement, but we should see it, it's your B/239. It's
3 a letter that Mr Parsons of Bond Dickinson wrote to you
4 on 16 August 2017. That is POL00000444.

5 **A.** I'm sorry the number again?

6 **Q.** It's your B/239.

7 **A.** I have at 238 the email and 239 the --

8 **Q.** Oh, I think we've gone to the wrong one but actually
9 it's not a bad idea that we do show this, because this
10 is a witness statement, if we scroll down, please, from
11 Andrew Parsons, and it is -- if I can read my own
12 writing -- it's 227 pages long and it's in relation to
13 the CMC issue, isn't it?

14 **A.** Yes, the first -- I think this was created before the
15 first case management conference.

16 **Q.** Okay, so, fortuitously we'll now know what the next
17 document is about. If we can go to POL00041509, which
18 is your B/238.

19 **A.** Thank you. I have that thank you.

20 **Q.** We'll just wait for everything to catch up. Here we
21 are. So it's a letter from Andrew Parsons to you, and
22 he says:

23 "Another funny letter from Freeths attached. My
24 witness statement has really annoyed them [no doubt
25 because it was 237 pages long]. This is good -- the

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1 more time they waste on side correspondence the less
2 time they are spending on important matters!

3 "A."

4 So it was a source of amusement, wasn't it, that you
5 had a strategy to run down the claimants' limited costs
6 and waste time as a way of putting pressure upon them?

7 **A.** Well, sort of -- that question was in two parts, a
8 source of amusement and --

9 **Q.** Please answer both.

10 **A.** The second part of the strategy, I think I've said,
11 I don't recall it ever being a strategy to run them out
12 of money. As I say, we had cost budgeting for that and
13 we didn't know what sums were. The second bit, the
14 source of amusement, no.

15 **Q.** Why was it a funny letter, then?

16 **A.** Well, Andy wrote it, so this is --

17 **Q.** Why was the letter from Freeths funny?

18 **A.** Well, that's how Andy Parsons has characterised it.

19 **Q.** He thought it was amusing but you didn't?

20 **A.** Well, my thing -- I'd seen the letter. Funny is also
21 peculiar.

22 **Q.** Well, that's fine, let's not dwell on that, on the
23 semantic point. I think what the bigger point is that
24 it's accepted, I think, by the steering committee that
25 the average value of each claimant's claim in a Group

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1 understand the sense of --

2 **Q.** I have to suggest to you that, as a member of the
3 steering committee and someone that was intimately
4 involved with the litigation, you knew exactly what you
5 were doing. This was your strategy of attrition that
6 the Post Office adopted throughout. Mr Bates has given
7 very compelling evidence, as have the majority of our
8 clients on this point. Can you now, with the benefit of
9 hindsight, accept that is what you did?

10 **A.** No, I can't and, again, I'll say this: on the attrition
11 point in particular, we had case management orders for
12 the first two trials and, in fact, we also had further
13 case management orders for a third trial, that stood up
14 two enormous trials in an extremely short period of
15 time. I think if you'd take the two dates from I think
16 October '17, when the first case management conference
17 in front of the managing judge, came up with the first
18 directions, proper directions were given, through to the
19 conclusion of the Horizon trial, which I accept was
20 greatly disrupted by the recusal matters, but even
21 allowing for that, those two trials were concluded in
22 I think roughly 18 months, plus or minus.

23 And I could say in terms of attrition, which I take
24 to mean slowing down drawing out, was quite the
25 opposite. That was pretty hard going.

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1 Litigation was £200,000; would you agree with that?

2 **A.** I think that was the number we got from collating the
3 schedule of information data, so that was a number that
4 was put on it at that time with that information, yes.

5 **Q.** I think you will also accept, it's been quite widely
6 reported, that, on average, although some got
7 significantly less, on average each claimant got about
8 £20,000 when the case settled because of the costs
9 issue?

10 **A.** When we settled the case, it was a lump sum and the
11 division was for the claimants to do and the advisers
12 and that was not something I recall Post Office being
13 privy to and, in fact, we were expressly sort of
14 excluded from it.

15 **Q.** But you take no issue, then, do you, as a result of the
16 way matters unfolded, claims that were worth £200,000,
17 on average, yielded £20,000, on average?

18 **A.** I'm sorry, the question on that? I'm sorry.

19 **Q.** You wouldn't dispute, would you, that, as a result of
20 how matters unfolded in the litigation, the claimants'
21 claims that were worth, on average, £200,000 each were
22 reduced to, on average, £20,000 each?

23 **A.** Well, I don't know if it was as a result of the way the
24 litigation went or the arrangements that they had with
25 funders and legal teams, but I -- if it helps, I can

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1 **Q.** Well, attrition means attack: attack the funders, attack
2 the money. We've seen in the emails what attrition
3 means, and that's what the --

4 **A.** I'm saying that I don't believe we did that strategy.
5 I believe we tried the two cases because, until those
6 were resolved, any resolution would not be possible.
7 That's my assessment of it.

8 **Q.** You gave evidence yesterday to say that you are now
9 working on the historical matters Remediation Unit in
10 the Post Office?

11 **A.** Well, I'm not actually working on much at all in
12 particular, other than the Inquiry --

13 **Q.** You've taken time off for this but, generally speaking,
14 that's what you do when you're not involved in this
15 Inquiry?

16 **A.** Well, that's what so -- and I think my statement I've
17 said this. What I've done is I moved from -- I was
18 moved from the Business As Usual Legal Team, into the
19 Remediation Unit, where focus was put on remediation
20 issues.

21 **Q.** Our clients simply cannot understand why a member of
22 Post Office's steering committee that helped drive the
23 Group Litigation, with all the tactics that Post Office
24 employed, is now working on the historical matters
25 remediation committee. What our clients say is that you

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1 are one of the historical matters, you shouldn't be
 2 remediating against your own actions, should you?
 3 **A.** I think that's fair. My role, very much as I've seen it
 4 in the Remediation Unit, was, by this stage -- and I --
 5 but by the time -- certainly, the -- probably by the
 6 time of the Common Issues judgment and certainly by the
 7 time of the settlement, effectively, the -- from my
 8 experience and from what I was witnessing, the conduct
 9 of the Group Litigation was largely being overseen by
 10 the Board or the subcommittee certainly, and the Board,
 11 in either guise, with direct input from the external
 12 lawyers. And most of my job with that was ensuring that
 13 the external lawyer's advice passed to the Board
 14 without -- but I was working on it --
 15 **Q.** You attended the trial, didn't you?
 16 **A.** Yes.
 17 **Q.** You were heavily involved?
 18 **A.** Yes.
 19 **Q.** I'm going to move on now because of the passage of time.
 20 I want to ask you about Gareth Jenkins. You have been
 21 taken to the Simon Clarke Advice --
 22 **A.** I have.
 23 **Q.** -- at length, where the Post Office were advised that
 24 Mr Jenkins was fatally undermined as a witness?
 25 **A.** Yes.

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1 paragraph 77. So we can see at paragraph 77 that there
 2 was an issue in relation to Mr Jenkins. So if we go
 3 down to the sixth or seventh line, you can see:
 4 "Expert evidence was called by the Post Office at
 5 her trial from Mr Gareth Jenkins from Fujitsu.
 6 Mr Jenkins was not called as a witness by the Post
 7 Office in the Horizon Issues trial before me, but
 8 a large amount of the evidence from the Fujitsu
 9 [witness, that's Mr Jenkins] was attributed to
 10 information directly given to them by Mr Jenkins. This
 11 was a controversial matter between the parties at the
 12 Horizon trial. The Post Office did not proffer
 13 an explanation for Mr Jenkins' non-appearance as
 14 a witness; they were not obliged to do so. However, in
 15 their closing submissions and after all the evidence had
 16 been called by both parties, they did so. The
 17 explanation provided was by way of submission and not
 18 evidence."
 19 Then if we go down to page 152 of 313, paragraph 511
 20 of the judgment please. We can see there was an issue,
 21 looking at 511, that the claimants asked why there was
 22 no statement from Mr Jenkins, whether he was available
 23 to give evidence and also whether he was involved as one
 24 of the team of shadow experts, and we've heard about
 25 shadow experts in questions put to you before lunch.

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1 **Q.** You know that Brian Altman KC, in his general review,
 2 said that Mr Jenkins was tainted and his position was
 3 untenable. It was right that he was never instructed as
 4 to the duties of an expert, was he?
 5 **A.** I don't know that but we have been through a note where
 6 that's recorded as having taken place.
 7 **Q.** So --
 8 **A.** Whether it was or not, I'm not sure.
 9 **Q.** So the revelations that Mr Henry put to you as
 10 "apocalyptic" before lunch were such that, quite
 11 clearly, Mr Jenkins couldn't give evidence in the Group
 12 Litigation, could he?
 13 **A.** And I think we formed that view, that's correct.
 14 **Q.** Could we go, please -- and this isn't a document you
 15 have in front of you, you will have to look on the
 16 screen -- but it's the Horizon Issues judgment, so
 17 I think you might be familiar with it.
 18 **A.** Parts of it.
 19 **Q.** If we go to UKGI00018137, and this is my last point,
 20 sir, so I'll endeavour to be quick, and not waste time.
 21 So if we could move to that judgment on the screen,
 22 please, and --
 23 **MR BEER:** I think the reference is fine it's just such
 24 a long document.
 25 **MR JACOBS:** So if we go down to page 29 of 313, which is

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1 Then at 512:
 2 "There the matter might have rested. However, in
 3 Post Office's written closing submissions,
 4 an explanation of sorts most for the first time
 5 provided. This was in the context of two matters:
 6 firstly, by way of explanation of Mr Godeseth's evidence
 7 [he's the man who did give evidence], and potentially to
 8 downplay its impact; secondly, in relation to the
 9 claimants' complaints about the second hand nature of
 10 some of the Post Office's factual evidence because in
 11 large part this had emanated from Mr Jenkins."
 12 The explanation was, at 144.1:
 13 "Taking into account that Mr McLachlan's evidence
 14 specifically addressed things said or done by Mr Jenkins
 15 in relation to the *Misra* trial, Post Office was
 16 concerned that the Horizon ... trial could become
 17 an investigation of his role in this and other criminal
 18 cases.
 19 "144.2. Moreover, the Post Office was conscious
 20 that if it only adduced first hand evidence in the
 21 trial, it would end up having to call more witnesses."
 22 I think it then goes on to say it would have been 34
 23 extra people giving to give evidence.
 24 Then 144.3:
 25 "Furthermore, so far as Post Office was aware, the

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1 relevant parts of Godeseth 2 were most unlikely to be
2 controversial. For example, the Misra trial was
3 a matter of public record, the four bugs were covered by
4 contemporaneous documentation and Post Office had no
5 reason to doubt Fujitsu's accounts of the documents it
6 held."

7 Now, if we could move on to paragraph 514, please.

8 The judge says:

9 "The following [important] in my judgment:

10 "Of primary importance is the principle that it is
11 for each party to decide whom to call ...

12 "Mr Jenkins is an important and central person so
13 far as the operation, efficacy and robustness of Horizon
14 is concerned ..."

15 He goes on to say:

16 "That is reinforced by Post Office's own closing
17 submissions ... that there were two possible candidates
18 for the witness ... It also stated that taking into
19 account Mr Jenkins' involvement in [the *Misra* case] the
20 decision taken to use Mr Godeseth."

21 Then at point 4, going down, please:

22 "The Post Office chose to proffer a reason for
23 Mr Jenkins' absence in closing submissions. They were
24 not applied to explain. However, the reason given in
25 paragraph 144.1 quoted above is not a valid reason for

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1 in this way, and having deprived the claimants of the
2 opportunity to cross-examine Mr Jenkins, the weight of
3 to be given to the evidence emanating from Mr Jenkins is
4 less than it would be otherwise."

5 I have some questions to ask you, as someone who was
6 involved in the steering committee. Who gave
7 instructions to counsel and to the litigation firm
8 instructed to draft closing submissions in this way?

9 **A.** Counsel held the pen on their closing submissions. The
10 closing submissions, I think, are very, very lengthy for
11 this trial.

12 **Q.** Who was responsible within Post Office for approving the
13 written submissions to which Mr Justice Fraser referred?

14 **A.** Er --

15 **Q.** Were you involved in that?

16 **A.** I can't even remember if I saw a draft of them at this
17 stage, the time pressure to put them in. I don't recall
18 the sequencing of what they were doing. My personal
19 recollection of that is that these were counsel's
20 closing submissions.

21 **Q.** Well, I'll ask you another question: you were involved
22 in these submissions, weren't you? You were involved in
23 this process, weren't you?

24 **A.** Not much with this at all.

25 **Q.** Not much?

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1 his absence. The claimants would have been entitled, in
2 cross-examination, to put to Mr Jenkins any previous
3 inconsistent statements he had made on the same subject,
4 but obviously only if there were any. These could,
5 potentially, have included previous statements he may
6 have made in earlier proceedings, but in order to be
7 allowed to do that, such statements would have to be
8 inconsistent with have evidence in the Horizon Issues
9 Trial. Putting a previously inconsistent statement on a
10 particular fact is permitted as part of
11 cross-examination ...

12 It goes on to say the Horizon trial wasn't about
13 Mr Jenkins, it was about Horizon issues and this type of
14 cross-examination will only have arisen if any
15 statements in the trial were not consistent.

16 Then -- nearly at the end now -- point 7:

17 "The fact that the Post Office chose to advance
18 certain evidence in the Horizon trial, that emanated
19 from Mr Jenkins, by means of another witness saying
20 'Mr Jenkins told me that ...' means that the claimants
21 were deprived of the opportunity properly to test the
22 evidence by asking Mr Jenkins about it. It also emerged
23 in cross-examination although not in his written report,
24 that Dr Worden has also obtained certain information
25 directly from Mr Jenkins. By dealing with this material

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1 **A.** I wouldn't like to say none because it's quite possible
2 I did, but not much, no.

3 **Q.** All right. I have three more questions for you.

4 Do you accept that the giving of an excuse about the
5 failure to call Jenkins in the High Court action was
6 a flagrant and deliberate act to provide instructions to
7 gloss over the non-calling of Jenkins in circumstances
8 where some Post Office staff and directors knew that his
9 credibility was in doubt?

10 **A.** Again, I'm sorry, there's so much in there. It doesn't
11 lend itself to --

12 **Q.** Yes, do you accept that giving an excuse in the High
13 Court that was a false excuse was deplorable because,
14 essentially, you knew and those within Post Office knew
15 the reason he hadn't been called wasn't because of what
16 you told the court; it was because he was tainted and he
17 wasn't a safe witness to call because of the Clarke
18 Advice?

19 **A.** Well, the reason was given -- was sorted out as with the
20 Legal Team on instructions, with the benefit of the
21 discussions around Jenkins. So, as far as I'm
22 concerned, the excuse given was done with
23 an understanding of the position.

24 **Q.** You've said --

25 **A.** And also, you know, with -- well, the benefit of

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1 counsel's input on it.

2 **Q.** My final point to you, you've used the word "excuse".

3 This wasn't an excuse, this was a cover-up and this was

4 misleading the court, wasn't it?

5 **A.** Um --

6 **Q.** Ultimately you must accept that?

7 **A.** No, I don't think anybody involved in -- certainly in

8 the Legal Team, I can't speak for anybody else but

9 I don't believe I was -- I would want to mislead a court

10 on anything and I don't believe anybody in the Legal

11 Team would have wanted to have done that either, and so

12 the excuse -- well, sorry, however you've described --

13 so the answer to the question is: no, because -- because

14 we wouldn't want to do that.

15 **Q.** Let me put it in another way: Mr Henry asked you about

16 your professional duties and obligations. How could

17 you, acting professionally, knowing what you know,

18 having read the Simon Clarke Advice, having read Brian

19 Altman KC's general review, how could you sanction

20 putting forward the reasons why Mr Jenkins wasn't called

21 that were put forward; that was misleading the court

22 wasn't it? It's quite clear.

23 **A.** Sorry, no, I don't accept that. But also I'll go back

24 to it, the plenty of references you read through very

25 quickly, the choice about whether to call Jenkins or

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1 very substantially within the time and we will move to

2 Mr Moloney.

3 **Questioned by MR MOLONEY**

4 **MR MOLONEY:** Thank you, sir, I'll try to do the same.

5 I've three things to ask you about: firstly, the

6 shredding advice from Simon Clarke; secondly, Crown

7 Offices, just a small topic, that is; and then, thirdly

8 and finally, remote access knowledge within Post Office.

9 So the first one is the shredding advice from

10 Mr Clarke and I've been permitted, in advance of today,

11 to ask you questions about this. Mr Beer has already

12 asked you some questions and I'll try not to repeat

13 them.

14 **A.** Thank you, sir.

15 **Q.** Okay. In response to the shredding advice that

16 Mr Clarke sent, and we know that he wrote it around the

17 2 August and Susan Crichton replied to it on 16 August,

18 so some two weeks later, you drafted the letter for

19 Susan Crichton to send to Andrew Cash, didn't you?

20 **A.** Yes.

21 **Q.** Andrew Cash, just to remind everybody, was the, I think,

22 Head of Advocacy at Cartwright King, in fact was his

23 formal term, but he was the main lawyer that you would

24 have contact with for this at Cartwright King?

25 **A.** He was the client partner, as opposed to --

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1 not, that is one for the parties to do and, as I say,

2 Post Office --

3 **SIR WYN WILLIAMS:** Hang on, Mr Williams. We know why you

4 didn't call Mr Jenkins, or at least there is a document

5 which explains that before the litigation, which was

6 that you thought his credibility was shot and that's why

7 you didn't call him, isn't it?

8 **A.** It is --

9 **SIR WYN WILLIAMS:** Why you chose to use him to provide

10 information is a different issue, but the reason why he

11 was not called is what transpired at the conference that

12 we went through this morning.

13 **A.** Yes, it is, sir, and where I think I'm going on that is

14 that was all connected to his engagement in the

15 criminal -- in criminal proceedings, as opposed to the

16 ones we were here before.

17 **SIR WYN WILLIAMS:** Sure. But the reason he was not called

18 was because the view was taken that his credibility had

19 been irretrievably lost.

20 **A.** Tainted, correct, sir, yes.

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

22 Right, any more, Mr Jacobs?

23 **MR JACOBS:** I haven't any others. I haven't any more to

24 add, sir.

25 **SIR WYN WILLIAMS:** Thank you. Then thank you for keeping

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1 **Q.** Exactly, so he was the partner.

2 **A.** Yes.

3 **Q.** Now, the letter that you sent or you drafted, rather,

4 for Susan Crichton to send to Andrew Cash, could we

5 please look at it, it's POL00193605, and it's B/67 in

6 your bundles, Mr Williams.

7 **A.** I'll deal with it on the screen. I'm conscious of time

8 and I've seen this today, so thank you.

9 **Q.** Sure. Having looked at it today, we know what the first

10 couple of paragraphs say and a key purpose of the

11 Horizon calls is identified in that second paragraph.

12 But if we go to the third and fourth paragraphs, just to

13 see what you say about that. The third paragraph reads:

14 "I am therefore deeply concerned at the suggestion

15 in Simon's note that there may have been an attempt to

16 destroy documentary material generated in connection

17 with the Horizon Calls, specifically any minutes of the

18 calls. (I note that Simon's advice does not suggest

19 that material connected to the operation of Horizon

20 itself may have been compromised)."

21 Then, in the fourth paragraph:

22 "Post Office Limited is committed to conducting its

23 business in an open, transparent and lawful manner. Any

24 suggestion to the contrary would not reflect Post Office

25 Limited policy, and would not be authorised or endorsed

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1 by Post Office Limited. Accordingly, the purported
2 statements referred to in Simon's note do not reflect or
3 represent Post Office Limited's position."

4 Yes?

5 **A.** Yes.

6 **Q.** Now, the allegation made by Mr Clarke was extremely
7 serious, wasn't it?

8 **A.** As we've agreed, yes.

9 **Q.** Just to, as it were, deal with one line of questioning
10 that you faced this morning, did you carry out any sort
11 of investigation before drafting this letter and, just
12 as examples of that, did you contact Mr Clarke to ask
13 where his information came from?

14 **A.** I don't believe -- I may have spoken to him. I don't
15 recall. I may have spoken to Martin Smith. I don't
16 recall either way.

17 **Q.** Okay.

18 **A.** I certainly don't recall doing it.

19 **Q.** If you had -- if you had -- would you have included in
20 the letter a summary of what either Mr Clarke or
21 Mr Smith said to you in response to the question as to
22 where the information came from, do you think?

23 **A.** I may have done. As I say, I'm not sure whether I did
24 or didn't, so I'm not sure whether that contact would or
25 would not have fed into the letter.

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1 that there was some substance to the suggestion?

2 **A.** Sorry, can I have the question again? I think yes
3 sounds right, I just want to make sure.

4 **Q.** I'll try and put it in easier -- more simple terms. If
5 you hadn't spoken to anybody and you can't remember that
6 you did --

7 **A.** That's correct.

8 **Q.** -- is it perhaps a bit premature to say, "I'm deeply
9 concerned at this suggestion"?

10 **A.** No, I think the suggestion stands on its own as
11 something to be deeply concerned about.

12 **Q.** Right.

13 **A.** I'm sorry for the pause, I was reading ahead and I'm
14 trying to think what was going on there because you're
15 asking me what did I put in, what did I not. I think
16 this looks like it's drafted as a corporate position,
17 this is what's supposed to have happened, "I trust
18 this" -- you know, and what the position -- so what
19 should have been happening with the material is being
20 recorded at these meetings, and what the position is,
21 which was that, no matter what may or may not have been
22 said to an individual, the company's position, which is
23 something I would think the General Counsel is
24 responsible for, did not support it, and --

25 **Q.** If you'd actually spoken to somebody, you'd have been

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1 **Q.** If there was any response from them, it would be -- you
2 would include, for example, "I know that Mr Clarke
3 absolutely stands by what was said to him", and so on,
4 you'd report to Susan Crichton what you'd said and that
5 would appear in the letter, wouldn't it?

6 **A.** Yes, I mean, I think the starter for ten is I think it's
7 Simon's note record it, so it's probably what Simon
8 heard.

9 **Q.** Yes, but there's no mention in here, for example, of
10 having spoken to Mr Clarke about it nor, indeed,
11 Mr Smith?

12 **A.** I don't think there's reference to that, no.

13 **Q.** Did you speak to Mr Scott at all?

14 **A.** I don't recall doing that, no.

15 **Q.** What about Mr Singh? Because he was in the same
16 open-plan office as you. Did you speak to Mr Singh
17 about what it was that Simon Clarke was alleging had
18 been done in relation to these minutes?

19 **A.** I don't recall that either way. So I don't recall it
20 no, I'm sorry. I'm sorry for the hesitation, I was
21 reading while I went -- which I shouldn't have done, I'm
22 sorry.

23 **Q.** If you hadn't spoken to anybody, it's perhaps premature
24 to be deeply concerned at the suggestion, if, by
25 speaking to people, you may have been able to find out

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1 able to say what the reality was, instead of simply the
2 corporate position, wouldn't you?

3 **A.** Quite possibly and, as I say, don't recall who was
4 spoken to in what context around this. I'm sorry,
5 I just don't.

6 **Q.** I'm going to come to the shredding advice in a moment
7 but, before I do, can I briefly go to the conference at
8 Mr Altman's chambers in October 2013 --

9 **A.** Yes.

10 **Q.** -- and that is POL00006485. It's B/80 for you,
11 Mr Williams.

12 **A.** Thank you very much, I have it. Thank you.

13 **Q.** Could we go to the final paragraph on this page, please.
14 I just want to touch on these things and your
15 recollection of this, Mr Williams, because it bears on
16 the evidence of others. "RW", that's you, isn't it?

17 **A.** I would think so, yes.

18 **Q.** "... then confirmed that the weekly hub meetings were
19 started to bed in, picking up any issues across the
20 business which may relate to Horizon. SC ..."

21 That's Simon Clarke, isn't it, rather than Susan
22 Crichton?

23 **A.** I'm not sure.

24 **Q.** Okay, well we can maybe clarify that in due course,
25 I don't want to take up time on this.

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1 A. It says there's some cultural issues --
 2 Q. That's it, so --
 3 A. I read that as being Susan Crichton, but I'm --
 4 Q. Okay. Well, if you go to the top of the page, actually,
 5 please just for a moment. I'm sorry, the document -- we
 6 see there Simon Clarke, (SC). Oh, I see, but they're
 7 both "SC" --
 8 A. They're both "SC".
 9 Q. -- Susan Crichton and Simon Clarke. So down to the
 10 bottom of the page again then, please, where it must be
 11 Simon Clarke because it says:
 12 "SC said that there had been some 'cultural issues'
 13 at the start which had now been overcome but he thought
 14 that it was necessary to put duties on individuals."
 15 A. Of course, thank you --
 16 Q. So we now know it's Simon Clarke?
 17 A. I didn't know how Simon -- it didn't feel like Simon
 18 would be talking about cultural issues, which felt like
 19 an internal Post Office thing, so my apologies.
 20 Q. Well quite, that's -- and that's perhaps an important
 21 point, Mr Williams, because with Simon Clarke referring
 22 to cultural issues at that juncture, could he perhaps be
 23 referring to attitudes to disclosure there?
 24 A. It's possible. I don't know what Simon would have been
 25 referring to. I think -- I don't know what Susan would

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1 not Legal/Security/connected with prosecutions.
 2 Q. Okay, and "everyone must be on message", was that
 3 essentially taking the same approach to the collation of
 4 material?
 5 A. That's how I read that.
 6 Q. Right.
 7 A. But -- that's how I read that.
 8 Q. Now, I have just briefly touched on that, can I please
 9 go to the shredding advice which is POL00006799, and to
 10 paragraph 5, please. This paragraph 5 is where
 11 Mr Clarke relates what it is that's been conveyed to
 12 him, so -- thank you very much. So we see at
 13 paragraph 5:
 14 "At some point following the conclusion of the third
 15 conference call, which I understand to have taken place
 16 on the morning of Wednesday, 31 July, it became unclear
 17 as to whether and to what extent material was either
 18 being retained centrally or disseminated. The following
 19 if has been relayed to me ..."
 20 Then, firstly:
 21 "The minutes of a previous conference call had been
 22 typed and emailed to a number of persons.
 23 An instruction was then given that those emails and
 24 minutes should be, and have been, destroyed: the word
 25 'shredded' was conveyed to me."

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1 be referring to but, when I looked at this, I thought
 2 I might be able to have a better idea. With Simon, I'm
 3 less sure, I'm sorry.
 4 Q. But you've no recollection, is probably the most
 5 important point?
 6 A. I think it is -- sorry, I don't recall, I'm sorry.
 7 Q. Then it carries on:
 8 "Consequently [Cartwright King] are in the process
 9 of writing a protocol to explain the purpose of the
 10 weekly hub meetings, the roles and responsibilities of
 11 individuals. [Post Office Limited] were picking up
 12 issues which were compiled in the matrix and it was
 13 observed that there had to be continuity of individual
 14 attendance at this meeting and everyone must be on
 15 message."
 16 So that reference to observe that there had to be
 17 continuity of individual attendance at this meeting,
 18 have you any recollection of that perhaps relating to
 19 certain individuals attending sometimes but essentially
 20 sending other persons to represent them at others?
 21 A. No, I just think, particularly in terms of the start
 22 point, that there was -- I seem to recall a bit of a --
 23 there had to be a bit of a drumming up to ensure that
 24 attendance at the meetings from the right people, and
 25 that included from other parts of the business that were

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1 Now, in your draft letter for Susan Crichton, you
 2 suggested that the contents of this advice caused deep
 3 concern, that "I'm therefore deeply concerned at the
 4 suggestion in Simon's note", yes?
 5 A. Yes, that's what I understood.
 6 Q. Did that first point cause you deep concern?
 7 A. Well, there are two bits there, the giving of the
 8 instruction that had been given, and the word
 9 "shredded", that, as I've said, was the concern.
 10 Q. Okay, and that caused you deep concern?
 11 A. That -- well, for me, any suggestion of shredding is
 12 deeply problematic, deeply concerning because you don't.
 13 But it's the first bit, the minutes had been typed and
 14 emailed. That piece would have been less concerning
 15 because an email is very difficult to shred.
 16 Q. Well, this says that:
 17 "Handwritten minutes were not to be type and should
 18 be forwarded to POL Head of Security."
 19 Did that cause you any concern?
 20 A. Well, would have done, yes. Well, not necessarily --
 21 necessarily the keeping of handwritten minutes as
 22 opposed to typed ones --
 23 Q. But not --
 24 A. -- is not in -- it's --
 25 Q. -- typed?

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1 A. It would have been odd in the Post Office to have done
2 that. That feels like you're trying to get around
3 something.

4 Q. Quite. Then at (iii):

5 "Advice had been given to [Post Office Limited]
6 which I report as relayed to me verbatim:

7 "'If it's not minuted it's not in the public domain
8 and therefore not disclosable'."

9 Is that something that caused you any concern?

10 A. It caused me, I think, confusion when I read it and
11 still does because, whether something is in the form of
12 a minute or not doesn't determine whether it's in the
13 public domain and neither does being in the public
14 domain determine whether something is disclosable. It's
15 disclosable if it's disclosable, whether it's held
16 internally or on a website.

17 Q. What about the final bit:

18 "'If it's produced it's available for disclosure --
19 if not minuted then technically it's not'."

20 A. Again, if I look at the front bit of it, "If it's
21 produced it is available for disclosure", that feels
22 correct; "if not minuted then technically it's not",
23 I don't think that's right. So I take this as a sort of
24 confused -- I found this confusing, this message.

25 Q. Right. Then:

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1 Q. Well, it is, because it's October 2011, but did you
2 overlap with Emily Springford at all, because she left
3 in 2012?

4 A. I don't recall ever meeting her, no.

5 Q. Okay. Anyway, this, as we can see, from the first
6 paragraph, says:

7 "As you are aware, [the Post Office] has received
8 4 letters of claim from former subpostmasters, making
9 a number of allegations about the training they
10 received, the support available to them ... and the
11 Horizon system itself."

12 This comes in the wake of letters before claim from
13 four former subpostmasters, including the late Julian
14 Wilson, who didn't live to see his conviction quashed
15 and I don't use that as a stick to beat you,
16 Mr Williams, it's simply I think it ought to be remarked
17 upon as something of that nature.

18 A. I'm sorry.

19 Q. It goes to a number of very senior people at Post
20 Office, as we can see. So it goes to Angela van den
21 Bogerd; Lesley Sewell, who was the Head of IT -- the
22 names are very familiar to people, regularly attending
23 these proceedings -- Mike Granville; Dave Pardoe; Hugh
24 Flemington; Dave Simpson; Mike Young, Kevin Gilliland;
25 Susan Crichton; Chris Day; Sue Huggins; and John Scott.

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1 "Some at POL do not wish to minute the weekly
2 conference calls."

3 A. Yes, I can see that.

4 Q. Now, may I take you, please, to a different document
5 which is POL00107696. Now, this is a document that was
6 sent to you, I think, yesterday, Mr Williams. It's
7 an email from Emily Springford. Could we go to --
8 I think it's the second page of this document, please,
9 and if we keep going on, please, actually. Yeah.

10 So this is quite a long email but do you have it in
11 hard copy and would you like to see all of it, or are
12 you okay on the screen?

13 A. I'm fine. Thank you for checking. I'm sorry.

14 Q. This is an email from 20 October 2011 and it's from
15 Emily Springford. Now, Emily Springford, she was
16 a senior lawyer at Royal Mail from 2009 to 2012 and, if
17 we go right to the end of this email -- I'm sorry for
18 the document examiner, to the end of this email, we can
19 see what her role was. We see there "Emily Springford
20 Principal Lawyer -- Dispute Resolution". Could we go
21 back to where we were, please. Thank you.

22 Did you overlap with Ms Springford at all --

23 A. I only saw this literally, I think, five minutes before
24 we started this morning and my very quick read is
25 I think the whole chain is before I joined Post Office.

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1 So, in effect, it's to the top brass on a day-to-day
2 basis, isn't it?

3 A. I certainly recognise quite a few of those names.
4 I don't know the place in the company at the time.

5 Q. Now, the final paragraph on that page says:

6 "Please ensure that this communication reaches
7 everyone in your department who has access to, or who is
8 in a position to create, documents relating to the
9 issues arising in the claims (as set out more fully
10 below). I have started a list of teams which we believe
11 may hold relevant documents. The list is attached:
12 I should be grateful if you would let me know of any
13 other teams which might hold documents relevant to the
14 claims."

15 If we could, please, just move down the page beyond
16 "Document preservation" to "Document creation". Now,
17 this reads -- if you'll just give me a moment, please --
18 this reads:

19 "It is very important that we control the creation
20 of documents which relate to any of the above issues and
21 which might be potentially damaging to POL's defence to
22 the claims, as these may have to be disclosed if these
23 claims proceed to litigation. Your staff should
24 therefore think very carefully before committing to
25 writing anything relating to the above issues which is

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1 critical of our own processes or systems, including
2 emails, reports or briefing notes. We appreciate that
3 this will not always be practicable, however."

4 "Where it is necessary to create a document
5 containing critical comment on these issues, it will in
6 certain circumstances be possible to claim privilege
7 over the document, so that POL will not have to disclose
8 it in any proceedings. As litigation is now a distinct
9 possibility, the document will be privileged if its
10 dominant purpose is to give/receive legal advice about
11 the litigation or to gather evidence for use in the
12 litigation. This also applies to communications with
13 third parties -- ie with other organisations -- provided
14 they are confidential and their dominant purpose is as
15 set out above. All of the following steps should be
16 taken in order to maximise the chances of privilege
17 attaching to the document:

18 "If the dominant purpose of the communication is not
19 to obtain legal advice, try to structure the document in
20 such a way that its dominant purpose can be said to be
21 evidence gathering for use in the litigation;

22 "Mark every such communication 'legally privileged
23 and confidential';

24 "If you are sending the document to someone, state
25 in the covering email/memo/letter that you are not

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1 interests of certainty I have included it here."

2 Now, the effect of this, Mr Williams, is,
3 essentially, "If you want to impart something critical
4 about Horizon, be very careful before you put it in
5 writing".

6 **A.** Well, about the complaint, I think, is -- but yes, it's
7 care in communications.

8 **Q.** It is.

9 **A.** Yes.

10 **Q.** It's "Don't put anything in writing that might cause us
11 problems in the litigation".

12 **A.** I'm sorry, I've literally read it for the first time
13 this morning, so don't feel I can comment on that but
14 it's certainly -- it looks to follow similar
15 communications I've seen that goes out as what is called
16 a litigation hold letter, when litigation is
17 anticipated. I'm just saying that's how I read it.

18 **Q.** Can we just go back to --

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

20 **Q.** I'm just --

21 **A.** I'm being asked about something I don't --

22 **Q.** I just want to take you to this because I'm going to
23 take you back to the Clarke Advice, the shredding
24 advice, in a second, and to "Document creation", please.

25 Now, as a lawyer now, Mr Williams --

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1 waiving privilege by doing so;

2 "Request that the recipient of a communication
3 confirm that the document will be kept confidential and
4 that he/she will not forward it to anyone else;

5 "Think very carefully before 'replying to all' on
6 an email -- do all the recipients need to see the
7 communication?

8 "Where possible and appropriate, copy a member of
9 Legal Services in to the communication, and make clear
10 that you are doing so to enable them to advise on the
11 content. Please note that copying a member of Legal
12 Services into the communication alone will not
13 necessarily suffice.

14 "If in doubt, call Legal Services before committing
15 anything to writing which relates to these issues and
16 contains critical wording."

17 Just to be clear, could we go up from this email to
18 see the next email from Emily Springford, who obviously
19 is very keen to ensure that this message is conveyed to
20 all places where it needs to be received. Yes, here we
21 go. So this is to Alison Bolsover, John Breeden, Sue
22 Richardson, Graham Padget, Sarah Rimmer and Dave
23 Hulbert:

24 "Please see the email below: this message should
25 have reached you via your team leaders but in the

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1 **A.** Sorry, I'm skim reading it as we go through it.

2 **Q.** Let's go through it a little bit carefully then:

3 "It is very important that we control the creation
4 of documents which relate to any of the above issues and
5 which might be potentially damaging to POL's defence to
6 the claims ..."

7 Yes? So that's the important issue, "might be
8 damaging to POL's defence".

9 **A.** I see that, yes.

10 **Q.** "... as these may have to be disclosed if these claims
11 proceed to litigation."

12 Thinking about disclosure, yeah?

13 **A.** Understood, yes.

14 **Q.** "Your staff should therefore think very carefully before
15 committing to writing anything relating to the above
16 issues which is critical of our own processes or systems
17 ..."

18 **A.** Thank you for taking me back to that. Yes, I can see
19 that, yes.

20 **Q.** Entirely. Then, just to add a gloss to that, with the
21 use of privilege:

22 "Where it's necessary to create a document
23 containing critical comment on these issues, it will in
24 certain circumstances be possible to claim privilege
25 over the document, so that POL will not have to disclose

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1 it in any proceedings. As litigation is now a distinct
2 possibility, the document will be privileged if its
3 dominant purpose is to give or receive legal advice
4 about the litigation or to gather evidence for use in
5 a litigation."

6 But then it says:

7 "If the dominant purpose of the communication is not
8 to obtain legal advice, try to structure the document in
9 such a way that its dominant purpose can be said to be
10 evidence gathering for use in the litigation."

11 Now, the whole thrust of this is that, "If people
12 commit critical opinions on Horizon or critical facts on
13 Horizon to writing, then this might cause trouble for us
14 in the litigation, in fact we might even lose the
15 litigation", is the ultimate effect of it.

16 Ironically, this is in writing, in black and white.

17 Can I go back to the shredding advice now, please,
18 which, for the document handler, is POL00006799, and to
19 paragraph 5 again, please.

20 Now, if we look at (iii):

21 "Advice had been given to POL which I report as
22 relayed to me verbatim ..."

23 If we look at the second aspect of that:

24 "'If it's produced it's available for disclosure --
25 if not minuted then technically it's not'."

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1 the letter that you drafted for Ms Crichton, that
2 instruction from Ms Springfield was far from open,
3 transparent and lawful, was it?

4 **A.** I can't speak about -- again, I haven't had a chance to
5 properly read it. The skim read I've done there makes
6 it look largely similar to a lot of precedent litigation
7 hold communications that are sent out, with some more,
8 but I hadn't had a chance to consider the detail.

9 **Q.** Can I ask you that more general question then, just very
10 quickly: saying "Right don't put anything critical in
11 writing because we might have to disclose it and that
12 might cause us problems in litigation", that's the
13 bottom line of it, is that -- reading that, is that
14 unique in your experience or is that something which is
15 a commonplace in civil litigation?

16 **A.** The warning on care in communications is commonplace in
17 my experience of litigation: if you're in litigation, be
18 aware that if you're creating documents they may be
19 disclosable and there are some protections that provide
20 privileges to those communications.

21 **Q.** But what about "Don't say anything critical in writing
22 because that might have to be disclosed"?

23 **A.** Sorry, thank you, that strikes me as being more focused
24 and targeted than I've seen in typical communications
25 like --

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1 "Advice had been given to POL which I report as
2 relayed to me verbatim:

3 "'If it's produced it's available for disclosure --
4 if not minuted then technically it's not'."

5 Isn't that precisely in accordance with the diktat
6 of Ms Springford back in 2011?

7 **A.** I'm sorry, I'm not necessarily making that -- but I'm
8 also not. I don't feel I can give evidence on those two
9 correlations without -- I'd want to take time, which --

10 **Q.** And --

11 **A.** I don't think I'd add much to it, I'm sorry, unless
12 I can. I think you're asking me just to agree
13 a submission, almost.

14 **Q.** No, I'm just asking you: do you not see the similarity
15 between that approach and what is said by Ms Springford
16 in her email in October 2011, and is that not advice
17 which has been given by a lawyer in Post Office?

18 **A.** At this -- I've seen the advice which was given by
19 a lawyer to the Post Office, and I've seen that.
20 I don't see references to it. I'm sorry, I just feel
21 really uncomfortable trying to conflate --

22 **Q.** Don't worry, I won't try and -- I'll leave the alone.

23 **A.** I'm sorry, I really do want to help but I don't feel
24 I can.

25 **Q.** Don't worry, Mr Williams. But to return to the terms of
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1 **Q.** Right, okay. I'll move on to my second topic now,
2 and --

3 **A.** Sorry, before you do that, can I take a two-minute
4 break?

5 **MR MOLONEY:** Provided Sir Wyn take the two minutes off my
6 time.

7 **THE WITNESS:** Sorry, I should have asked you, Sir Wyn. I'm
8 now doing it very publicly, I'm afraid.

9 **SIR WYN WILLIAMS:** Yes, of course, you must have a comfort
10 break.

11 **THE WITNESS:** Thank you, sir.

12 (3.18 pm)

13 (A short break)

14 (3.21 pm)

15 **MR BEER:** Sir Wyn, can you see and hear us?

16 **SIR WYN WILLIAMS:** Yes, I can thank you.

17 **MR BEER:** Back to Mr Moloney.

18 **MR MOLONEY:** Not at all. Second item is Crown Offices and
19 this is a document POL00144855. It's not a complex
20 document this one, Mr Williams, there's only one point
21 to take out of it. You can probably look at it on the
22 screen safely. It's the 14 bug, and it's an email from
23 you to a number of people, Lesley Sewell, Alwen Lyons,
24 senior people, on 27 June 2013, yes?

25 **A.** Mm-hm.

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1 Q. It refers to the 14 bug and it says that you're writing
 2 letters, essentially, to all the subpostmasters affected
 3 by it and you say in the second paragraph:
 4 "Can I please have any comments on these ASAP by
 5 midday tomorrow so they can be sent to the 10 affected
 6 branches tomorrow ..."
 7 In parentheses:
 8 "... (10 as we are not writing to the 4 Crowns also
 9 affected)."
 10 Can I just ask why -- this is a short point -- why
 11 were the Crown Offices not having letters sent to them?
 12 A. Because they are owned and managed by Post Office; it
 13 was essentially Post Office writing to Post Office.
 14 Q. Precisely. But this bug and, by inference, other bugs,
 15 were also affecting Crown Offices, weren't they?
 16 A. I don't know to what extent they were or weren't, but
 17 the bugs would affect the Horizon system, which were in
 18 Crowns and others. So --
 19 Q. Because this says "10 as we are not writing to the
 20 4 Crowns also affected", so the bugs were affecting
 21 whether they all were or some of them, at one time or
 22 another, et cetera, et cetera, Crown Offices were being
 23 affected by these bugs?
 24 A. They could be affected by a bug equally, yes.
 25 Q. The reason I ask you about this, is that it may be --
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1 Office --
 2 Q. Exactly. Whereas in the case of subpostmasters, you
 3 could recover from subpostmasters, couldn't you?
 4 A. Yes.
 5 Q. And you did?
 6 A. Yes.
 7 Q. They had a contract which stipulated that they were
 8 liable for all shortfalls?
 9 A. It depends how it is construed now, shortfalls caused by
 10 I think on the pre -- the old model contract, pre-Common
 11 Issues judgment, I think it was for errors caused by
 12 their own carelessness, negligence or error.
 13 Q. Quite. Post Office, in its approach to civil recovery,
 14 asserted that postmasters were liable for all
 15 shortfalls, unless they could show they weren't
 16 responsible for them, in effect, didn't they?
 17 A. Yes, well, I think that's slightly -- all I'm able to
 18 say is I know what the contract was, I don't know how it
 19 was always enforced, vis à vis the network, but whether
 20 it was all or just those or what was done to determine
 21 those two. But, certainly, the point is Post Office
 22 pursued postmasters for shortfalls -- yes.
 23 Q. The shortfalls -- they obviously didn't pursue Crown
 24 Offices because it was their own money but they pursued
 25 subpostmasters because they were, essentially, on
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1 and it will be -- that a witness comes and says, "One of
 2 the reasons I thought Horizon difficulties were not
 3 systemic but instead be due to the errors and other
 4 behaviour of subpostmasters because the difficulties
 5 didn't affect Crown Offices", that would be a mistaken
 6 assumption on their part, wouldn't it?
 7 A. Right, I don't know the full context of it but a bug
 8 would affect it -- my understanding is a bug would
 9 affect Horizon terminal, but -- I think they all had the
 10 same equipment, is the short point.
 11 Q. So far as you were aware, there is no reason to believe
 12 that bugs affected Crown Offices any less or any more
 13 than sub post offices; you just don't know, do you?
 14 A. No, I don't, that's correct.
 15 Q. Were you aware of there being any differences of the
 16 proportion of prosecutions of postmasters, as opposed to
 17 managers of Crown Offices?
 18 A. I'm not familiar with that.
 19 Q. It's not your area, is it --
 20 A. No.
 21 Q. -- the criminal prosecutions, but what about civil
 22 recovery. Any difference so far as civil recovery for
 23 shortfalls in Crown Offices?
 24 A. Well, I don't think Post Office -- it would be -- it
 25 would be seeking to recover from itself, at a Crown
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1 a contract, which meant that they were, in theory, on
 2 the face of it, liable for shortfalls and that was the
 3 approach that Post Office took to them?
 4 A. I think, yes, yes.
 5 Q. They had limited resources to fight the claims against
 6 them, they couldn't afford the services of a Bond
 7 Dickinson or a Herbert Smith Freehills, could they?
 8 A. Speaking very generally, I think it's safe to say they'd
 9 be less likely to, that's for sure. I would say that,
 10 yes.
 11 Q. Just, finally, then, the remote access and Project
 12 Zebra, and I'd like to take you to POL00255949.
 13 A. Sorry, Mr Moloney, can I have the --
 14 Q. I'll find you the reference in the --
 15 A. Thank you.
 16 Q. Whilst I'm getting you the reference in the --
 17 In your B/275, Mr Williams, and I'm grateful to
 18 Ms Patrick.
 19 A. Thank you. I can see it as well.
 20 Q. Now, this is an email from Amy Prime to you on 26 July
 21 2018?
 22 A. Yes.
 23 Q. We can see who is copied in, Andrew Parsons, Mark
 24 Underwood, and this is a query about privilege.
 25 For reasons of time, have you looked at this
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1 document before you came to give evidence, and you
 2 remember it?
 3 **A.** I did thank you, yes.
 4 **Q.** Essentially, it's Amy Prime asking about privilege in
 5 relation to documents which relate to Project Zebra --
 6 that's the Deloitte report -- and most documents are
 7 covered by privilege but they've come up with one,
 8 they've found one, and this is the Zebra Action Summary:
 9 "I have attached the email chain but the document of
 10 interest is the Zebra Action Summary attached to the
 11 email. This is a document produced in response to the
 12 Zebra Report which sets out the recommendations from the
 13 Report and the remediation which should be implemented
 14 to Horizon.
 15 "Counsel's initial view is that privilege cannot be
 16 claimed over the whole of the Zebra Action Summary but
 17 the parts which repeat or summarise the contents of the
 18 Deloitte report can be redacted."
 19 Then she asks you to ask a few questions of people;
 20 do you remember this?
 21 **A.** I didn't remember it specifically but I have seen this
 22 as part of the preparation for it, so yes.
 23 **Q.** So it's plain that, if possible, they would like to keep
 24 privileged and not disclose the contents of the Deloitte
 25 report, as summarised within the document?

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1 and, so far as you're aware, other people in Post Office
 2 hadn't appreciated that significance from the Deloitte
 3 report either --
 4 **A.** Yes.
 5 **Q.** -- until the Chairman's report?
 6 **A.** That's what my recollection is, yes.
 7 **Q.** Now, in order to comply with these requests, did you
 8 examine the Zebra Action Summary?
 9 **A.** Um ...
 10 **Q.** I won't waste time; I'll just take you to it.
 11 **A.** I don't recall doing that. Was it attached to the
 12 email?
 13 **Q.** Yes.
 14 **A.** Yes.
 15 **Q.** It says it's attached.
 16 **A.** Thank you. Then I may well have done and I certainly --
 17 **Q.** Can we have a look at it, please. It's POL00031409.
 18 E/25, please, Mr Williams.
 19 **A.** E/25, yes. Thank you. I'm so sorry. Yes.
 20 **Q.** Page 6, if we could. Just to identify it, 12 June 2014,
 21 version 3, authors James Rees, Emma McGinn and Julie
 22 George, and these are the people who are referred to in
 23 the email that you're asked to ask questions of.

Page 6 of this, please, 4.2.2. This is a document
 produced within Post Office, by technical people within

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1 **A.** The way I read this is that they're considering
 2 privilege over the extracts of the argument, yes.
 3 **Q.** Absolutely.
 4 **A.** Absolutely.
 5 **Q.** Consistent with the approach to Deloitte more generally?
 6 **A.** Yeah.
 7 **Q.** You've said that the Post Office didn't understand the
 8 full significance of the Deloitte report until the
 9 Chairman's report; is that right?
 10 **A.** No, I wouldn't have said that. What I said was the full
 11 significance of the remote access piece.
 12 **Q.** Yes.
 13 **A.** Sorry, the --
 14 **Q.** Sorry, that's confusion on my part. Did it boil down to
 15 you didn't appreciate they could delete in
 16 an undetectable way?
 17 **A.** I think it referred to the balancing transactions piece
 18 it was the audit store. The piece I hadn't appreciated
 19 was the ability to access the audit store, remove and
 20 replace it.
 21 **Q.** So to delete material and then replace it in
 22 an undetectable way?
 23 **A.** That was the bit I recall giving evidence about, I'm
 24 sorry if it's --
 25 **Q.** Exactly. You hadn't appreciated the full significance

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1 Post Office, and it says at 4.2.2 "Data Logging".
 2 **A.** Yes.
 3 **Q.** "One point raised in the report [that is referring to
 4 the Deloitte report] was that it was possible for
 5 someone with privileged access to delete data from
 6 specific areas of Horizon. This is always a risk with
 7 individuals using admin or power user accounts and is
 8 a persistent risk, one that needs to be catered for in
 9 almost any organisation.
 10 "Due to the sensitive nature of the information
 11 contained in the databases, monitoring of those
 12 databases should be put in place using technology to
 13 detect and record deletions and administrative changes
 14 to the databases. If possible, alerts should also be
 15 generated for mass deletions and high level risk changes
 16 to database schemas."
 17 So this is an internal Post Office document, it's
 18 from June 2014. It says that the Deloitte report
 19 identifies deletion, the potential for deletions, and
 20 that processes need to be put in place in order to
 21 ensure that that doesn't happen in an undetected way.
 22 So it's plain that these people in Post Office
 23 understood that data could be deleted.
 24 **A.** They're certainly discussing it in this, yes.
 25 **Q.** Absolutely. Now, can I now take you to an email, which

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1 is POL00346958. E/129 for you, Mr Williams.
 2 I'll repeat the POL00346958 for the document
 3 handler.
 4 **A.** E/129 was it?
 5 **Q.** Yes, that's it.
 6 Remember at the time you, Mr Williams, were involved
 7 in certifying, in May 2014, two Second Sight formal
 8 certifications, it was described by Mr Parsons, that
 9 there couldn't be access to delete. That was what
 10 Second Sight required and you explained how things
 11 happened. This is in June 2014, and this is an email
 12 from Julie George, who is the person producing the
 13 report. It's to Rod Ismay, David Mason and Malcolm
 14 Zack. So you're not copied into this but what it says
 15 is:
 16 "Hello all,
 17 "I've tried to call you Rod -- attached a Draft
 18 Summary of actions arising from Deloitte's recent piece
 19 of work on the Horizon systems."
 20 So that's the Zebra Action Summary we've just looked
 21 at, and we can see it in the subject, "Zebra Action
 22 Summary [version] 3", and the attachment, "Zebra Action
 23 Summary [version] 3":
 24 "Clearly there is no blame attached anywhere, and
 25 this morning's meeting with Chris Day, Chris Aujard,
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1 Lesley [that will be Lesley Sewell] and Malcolm --
 2 focused on what we would need to put in place as
 3 an organisation to address overall assurance on all
 4 critical systems, starting with Horizon from 1 April."
 5 So it looks like that morning, 17 June 2014, General
 6 Counsel -- Interim General Counsel, as he was --
 7 Mr Aujard, had been at a meeting with, amongst others,
 8 Lesley Sewell, the Head of IT, where Zebra Action
 9 Summary had been discussed.
 10 Did anybody ever raise with you the contents of the
 11 Zebra Action Summary at this time when you were
 12 providing Second Sight with, as it were, formal
 13 certification that there could not be remote access to
 14 delete and replace entries in the audit?
 15 **A.** I don't recall. I do recall that -- at some point,
 16 I think there is a document where I explain something
 17 arising out of these works and it involves balancing
 18 transactions, which I was interested in. But I don't
 19 recall this, I'm sorry.
 20 **Q.** You don't recall "delete in an undetectable way" because
 21 those are the things that you ultimately were very
 22 surprised about when Jonathan Swift Queen's Counsel, as
 23 he then was, drew your attention to that in the report?
 24 **A.** Yes. That's my recollection, yes.
 25 **MR MOLONEY:** Thank you very much, Mr Williams. That's all
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1 I ask.
 2 **THE WITNESS:** Thank you.
 3 **SIR WYN WILLIAMS:** Thank you, Mr Moloney.
 4 So, first of all, Mr Williams, I believe that that
 5 is the end of the questioning for you. So I am grateful
 6 to you for your detailed witness statement and for you
 7 giving evidence over the past two days. So thank you.
 8 I'd like to thank the counsel, leading counsel and
 9 Mr Jacobs, for the discipline which they've shown in
 10 keeping to time limits.
 11 I understand, Mr Beer, we plan to start again at
 12 9.45 on Tuesday; is that correct?
 13 **MR BEER:** Yes, that's right, sir.
 14 **SIR WYN WILLIAMS:** So we'll begin again at 9.45 on Tuesday
 15 with Ms Crichton, yes?
 16 **MR BEER:** That's right.
 17 **SIR WYN WILLIAMS:** So we'll adjourn until then. Thank you
 18 very much.
 19 **MR BEER:** Thank you, sir.
 20 (3.37 pm)
 21 (The hearing adjourned until 9.45 am
 22 on Tuesday, 23 April 2024)
 23
 24
 25

I N D E X

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