

Thursday, 25 April 2024

1
2 (9.44 am)
3 **MR BEER:** Good morning, sir, can you see and hear us?
4 **SIR WYN WILLIAMS:** I can, thank you very much.
5 **MR BEER:** Thank you, may I call Ms van den Bogerd, please.
6 **SIR WYN WILLIAMS:** Yes, of course.
7 **ANGELA MARGARET VAN DEN BOGERD (affirmed)**
8 **Questioned by MR BEER**
9 **MR BEER:** Good morning, Ms van den Bogerd. My name is Jason
10 Beer and I ask questions on behalf of the Inquiry. Can
11 you tell us your full name please.
12 **A.** Angela Margaret van den Bogerd.
13 **Q.** You have provided two detailed witness statements to the
14 Inquiry, for which many thanks, and thank you for
15 attending to give evidence today. Before we get into
16 the detail of those two witness statements, I think
17 there's something you wanted to say; is that right?
18 **A.** It is, thank you. If I may.
19 Saying sorry, I know, doesn't change what happened
20 but I do want to say to everyone impacted by wrongful
21 convictions and wrongful contract terminations that I am
22 truly, truly sorry for the devastation caused to you,
23 your family and friends. I hope my evidence will assist
24 this Inquiry with getting to the answers you and so many
25 others deserve.

1

1 an interview with a subpostmaster ..."
2 I think you want to add the words "this type of"
3 after the words "attended" so that it reads:
4 "This was the first time I had ever attended this
5 type of an interview ..."
6 **A.** That's correct.
7 **Q.** Is that correct?
8 **A.** Thank you.
9 **Q.** Page 38, please, paragraph 77, line 7. The date, the
10 first date -- I think you would like to amend 10 March
11 2012 to 10 May 2012; is that right?
12 **A.** That's correct, yes.
13 **Q.** At page 65, please, line 1, I think you would like to
14 delete the words "as the terms of reference have not
15 been disclosed"?
16 **A.** That's correct because I've seen them since I put this
17 together.
18 **Q.** So it would read "From memory, the purpose of Project
19 Sparrow was to oversee"?
20 **A.** Correct.
21 **Q.** Page 104, please, paragraph 223(b), which is at the foot
22 of the page. I think you would like to add the words
23 "from memory" at the beginning of the paragraph so it
24 reads "From memory, my involvement"?
25 **A.** Correct.

3

1 Thank you, Mr Beer.
2 **Q.** Thank you. Can we look at the two witness statements,
3 please. The first is 114 pages long, dated 20 March
4 2014, and the URN, if we can display it, please, is
5 WITN09900100.
6 I think there are seven corrections that you wish to
7 make to that statement?
8 **A.** Yes.
9 **Q.** Can we start with the first of those, please, which is
10 page 21, paragraph 36. I think there's an addition that
11 you would like to make to the end of paragraph 36 to
12 insert the following words.
13 "Further disclosure (POL00142481 and POL00178171)
14 shows I initiated the provision and analysis of the
15 Horizon logs in respect of the unexplained loss at the
16 branch."
17 So I'll read that back without the two URNs:
18 "Further disclosure ... shows I initiated the
19 provision and analysis of the Horizon logs in respect of
20 the unexplained loss at the branch."
21 Is that right?
22 **A.** That's correct, thank you.
23 **Q.** The second amendment, page 31, please, paragraph 62, in
24 line 8, which reads.
25 "This was the first time I had ever attended

2

1 **Q.** Then, at the end of the paragraph, add the following
2 words:
3 "However further disclosed documents show I was
4 involved in discussions regarding overlaps between
5 witness statements."
6 **A.** That's correct. Thank you.
7 **Q.** Page 109, please, at paragraph 229. At the end of the
8 paragraph, I think you would like to add the words:
9 "Further disclosure shows me raising my concerns to
10 Andrew Parsons of Womble Bond Dickinson."
11 **A.** Correct.
12 **Q.** So:
13 "Further disclosure shows me raising my concerns to
14 Andrew Parsons of Womble Bond Dickinson."
15 Can you turn to the final page of the witness
16 statement, page 114; is that your signature?
17 **A.** It is, yes.
18 **Q.** With those corrections brought into account are the
19 contents of that witness statement true to the best of
20 your knowledge and belief?
21 **A.** They are.
22 **Q.** Thank you. Can we turn to the second witness statement
23 which is seven pages long, WITN09900200. I think
24 there's one correction you would like to make to that,
25 which is on page 6., paragraph 16. I think you would

4

1 like to delete the words, starting three lines from the
 2 bottom, "whilst I cannot"?

3 **A.** Correct.

4 **Q.** Right until the end of the paragraph?

5 **A.** That's right.

6 **Q.** So all of that page from "whilst I cannot" and then over
 7 the page to the words "the Scheme"?

8 **A.** Correct.

9 **Q.** And instead insert the words:
 10 "Helpline calls were not audio recorded at the time.
 11 It was the call logs that were used for the scheme
 12 investigations."

13 **A.** That's correct, thank you.

14 **SIR WYN WILLIAMS:** I'm sorry, Mr Beer, there are two
 15 sentences ending with "scheme", there's the first line
 16 and the third line. Where do I stop deleting, is it
 17 right to the end, or the first "scheme"?

18 **MR BEER:** It's right to the end, sir.

19 **SIR WYN WILLIAMS:** Fine. Could you just tell me again what
 20 the correction includes, by way of additional words?

21 **MR BEER:** Yes:
 22 "Helpline calls were not audio recorded at the time.
 23 It was the call logs that were used for the scheme
 24 investigations."

25 **SIR WYN WILLIAMS:** Thank you very much.

5

1 **A.** That's correct.

2 **Q.** You were a Retail Network Manager between 1996 and 2001?

3 **A.** Correct.

4 **Q.** You were the Head of Area for the rural agency in Wales
 5 between 2001 and 2005?

6 **A.** Correct.

7 **Q.** You were the General Manager for the Community Network
 8 of branches between 2005 and 2006?

9 **A.** Correct.

10 **Q.** You were the national Network Development Manager
 11 between 2006 and 2009?

12 **A.** Yes.

13 **Q.** You were the Network Change Operations Manager between
 14 2009 and 2010?

15 **A.** Correct.

16 **Q.** You were Head of Network Services between 2010 and 2012?

17 **A.** Yes.

18 **Q.** You were Head of Partnerships between 2012 and 2013?

19 **A.** Yes.

20 **Q.** You were Programme Director for the Branch Support
 21 Programme between 2013 and 2015?

22 **A.** Correct.

23 **Q.** You were Director of Support Services between 2015 and
 24 2016?

25 **A.** Yeah.

7

1 **MR BEER:** Thank you, sir.
 2 Is that your signature on page 7?

3 **A.** It is, yes.

4 **Q.** Are the contents of the witness statement true to the
 5 best of your knowledge and belief with that correction
 6 brought into account?

7 **A.** They are, yes. Thank you.

8 **Q.** Thank you, that can come down.
 9 Can I start, please, with your career at the Post
 10 Office. You had an extensive career at the Post Office
 11 spanning some 35 years; is that right?

12 **A.** That's correct.

13 **Q.** You first joined the Post Office in 1985 straight from
 14 school; is that right?

15 **A.** Yes.

16 **Q.** You began as a Post Office counter assistant, so working
 17 the counters, and were a person who rose up through the
 18 organisation, holding, in the end, numerous managerial
 19 roles; is that right?

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

21 **Q.** Can I outline your career path, as I've understood it:
 22 in summary, as follows, you were a counter assistant
 23 between 1985 and 1987?

24 **A.** Correct.

25 **Q.** You were a Branch Manager between 1987 and 1996?

6

1 **Q.** You were People and Change Director between 2017 and
 2 2018?

3 **A.** Correct.

4 **Q.** You were People Services Director in 2018?

5 **A.** Yes.

6 **Q.** And you were the Business Improvement Director between
 7 2018 and 2020?

8 **A.** That's correct.

9 **Q.** Given the length and breadth of your career, do you
 10 accept you had extensive contact with and
 11 an understanding of the position of subpostmasters?

12 **A.** I did yes.

13 **Q.** Do you agree that you lived through the development, the
 14 rollout of Horizon?

15 **A.** Yes, I accept that.

16 **Q.** You lived through the rollout of the IMPACT Programme?

17 **A.** Sorry, the IMPACT Programme?

18 **Q.** Do you not remember the IMPACT Programme?

19 **A.** No.

20 **Q.** 2005?

21 **A.** I'm not familiar with the IMPACT Programme.

22 **Q.** Do you accept that you lived and worked through the move
 23 to Horizon Online in 2010?

24 **A.** Yes, I did.

25 **Q.** The production of the Ismay report in 2010?

8

1 A. Yes.

2 Q. The production of the Detica report and the Deloitte
3 reports?

4 A. Yes, I've seen that, yeah.

5 Q. All of the prosecutions of subpostmasters based on
6 evidence produced by Horizon happened when you were --

7 A. Yes, I wasn't involved in those but, yes, they happened
8 during my time.

9 Q. You were involved intimately in the Second Sight initial
10 investigation --

11 A. Yes.

12 Q. -- and with the Mediation Scheme --

13 A. Yes.

14 Q. -- and you were extensively involved in the Group
15 Litigation?

16 A. Yes.

17 Q. Do you accept that your managerial roles permitted and,
18 indeed, required you to raise issues faced by
19 subpostmasters to senior management and then, latterly,
20 to the Board?

21 A. When I became aware of them, yes. In terms of the
22 Board, whether it was directly by myself, probably not,
23 but via my reporting line.

24 Q. Who was your reporting line?

25 A. It depends at what time. So my reporting line in terms

9

1 reporting line. But I would be called sometimes just to
2 give updates, so on the Branch Support Programme, for
3 instance, I might be called to go and give an update on
4 the paper but, normally, your Exec Director, as
5 a sponsor, would introduce you into that session and you
6 would take over and update, through the paper.

7 Q. How many times did you attend the Board?

8 A. Oh, over my length of career, not -- I wasn't a regular
9 attendee of the Board. So we had the Board and then,
10 below that, we that the Executive Team, so I would
11 probably have spent more time updating the Executive
12 Team and, occasionally, go to Board for whatever I was
13 doing at the time.

14 So there were other things I will have updated the
15 Board on because I was involved in other things other
16 than what we've discussed as well.

17 Q. How many times do you think you attended the Board?

18 A. I'd say between 10 and 20 over the length of my career,
19 probably. I can't be exact.

20 Q. You left the Post Office in May 2020; is that right?

21 A. That's correct.

22 Q. You describe leaving the Post Office in your witness
23 statement, if we can turn that up, the first one. It'll
24 come up on the screen. Page 110, please. At the foot
25 of the page, please, paragraph 233. You say:

11

1 of managerial roles tended to be Sue Huggins, Kevin
2 Gilliland, Al Cameron, and then my last role was
3 reporting into Jane MacLeod.

4 Q. So if we just go through, when you were Head of
5 Partnerships in 2012 to 2013 who was your reporting
6 line?

7 A. I believe that was Kevin Gilliland.

8 Q. Programme Director for the Branch Support Programme, '13
9 to '15?

10 A. I think that was Kevin again.

11 Q. Director of Support Services, '15 to '16?

12 A. Sorry, that was Al Cameron.

13 Q. People and Change Director, '17 to '18?

14 A. So I had a dual reporting line, Al Cameron and Martin
15 Kirke, who was the HR Group Director at the time.

16 Q. People Services Director in 2018?

17 A. Al Cameron.

18 Q. Business Improvement Director, '18 to '20?

19 A. Jane MacLeod.

20 Q. So you wouldn't have had direct access to the Board, is
21 that what you're saying, but, through each of those
22 reports, indirect access?

23 A. So what used to happen is, if you took anything to the
24 Board, you would normally have a sponsor who was
25 an Executive Director and that would have been my

10

1 "With the settlement being reached on the [Group
2 Litigation] in December 2019, my role came to an end.
3 As a result, I was made redundant."

4 Is that right?

5 A. That's correct.

6 Q. Can we look please at PVEN00000280 and, over the page,
7 please. This is a copy of text messages exchanged
8 between you and Paula Vennells in May 2020. Can you see
9 that the one at the top is Ms Vennells asking you how
10 you are and what lockdown is like for you, yes?

11 A. Yes.

12 Q. Then your reply is at the foot of the page:

13 "Hi Paula. Good to hear from you -- we are all
14 keeping well thank you. I hope you ... are too?
15 Lockdown has been 24/7 working on [Covid-19] crisis
16 management for me in recent weeks. However I leave [the
17 Post Office] on Monday. Just finalising the details of
18 my agreement and it's not common knowledge in work yet
19 but the time is right for me to leave. The last year
20 has reinforced that for me. Don't know what I'll do
21 going forward ... but I'm looking forward to pastures
22 new. I'm glad some things I said have been useful for
23 you. Take care", et cetera.

24 A. Yes.

25 Q. You say it wasn't common knowledge in work that you were

12

1 leaving but the time is right for you to leave, the last
 2 year has reinforced that for you. It seems from this
 3 that it was what had happened in the previous year that
 4 was relevant to your decision to leave; is that right?

5 **A.** That's correct.

6 **Q.** In that time, the Post Office had lost the Common Issues
 7 Trial --

8 **A.** Mm-hm.

9 **Q.** -- the Post Office had lost the Horizon Issues Trial,
 10 the Post Office had failed successfully to appeal to the
 11 Court of Appeal and the Post Office had reached
 12 a settlement of over £50 million with the Group
 13 Litigation claimants. You had been significantly and
 14 deeply criticised by a High Court judge.

15 **A.** Yes.

16 **Q.** Were those relevant to your reasons for leaving?

17 **A.** Not really. It was what came after that. So --

18 **Q.** What came after that?

19 **A.** So I think, to set the context, so the only -- when
 20 I moved into the branch improvement -- sorry, business
 21 improvement role, that was the first time that I'd been
 22 exclusively working on that role, so, throughout the
 23 whole of my career, including the investigations of
 24 Second Sight at the start of the scheme, that was on
 25 addition to my day job. So it was additional

13

1 **A.** Okay, I'll try. Sorry, I do tend to drop my voice, so
 2 just let me know and I'll raise it.

3 **Q.** You said that you said to, and then I missed who you
 4 said it to?

5 **A.** So it was a general conversation within the business.
 6 I said, you know, the success would be measured by how
 7 quickly we pay out compensation, how much compensation
 8 we pay out and how little we spend on solicitor costs in
 9 doing that, and I was concerned that all of that was
 10 reversed so we were spending quite a lot of money on
 11 solicitor costs and we weren't progressing applications
 12 through that scheme as quickly as we should. So by the
 13 time I left in the May, no payments had been made and we
 14 weren't any further forward, so I just got very
 15 disillusioned with, I suppose, the intent of the
 16 business to resolve what we'd agreed that we would do.

17 **Q.** Who was driving the intent of the business, to not do
 18 the three things that you've identified?

19 **A.** I'm not really sure, because the lawyers were heavily
 20 involved at the time. It just didn't seem to get the
 21 traction I thought we should have.

22 So my view was, you know, we'd come through very
 23 difficult trials, we'd agreed the settlement and,
 24 therefore, we accept that's the position and we should
 25 move on and do what we should do as quickly as we

15

1 responsibility.

2 So when I moved into the business improvement role,
 3 that was full time, supporting the GLO. So,
 4 technically, when that ended my role was redundant but
 5 I didn't leave straightaway because that was in the
 6 December and I left in the May. So, after the
 7 settlement, then I started to -- I was asked, then, to
 8 look at the Horizon Shortfall Scheme, what that would
 9 look like, and I spent some time working with the
 10 lawyers -- it would have been HSF at that time -- and,
 11 I think, for me, I got a bit disillusioned, in as much
 12 as we had settled and, therefore, my view is we should
 13 now push on and deliver what we said we would, which was
 14 Horizon Shortfall Scheme, as quickly as we should, and
 15 it just wasn't happening.

16 **Q.** Why wasn't it happening?

17 **A.** Because there was lots of discussions around what that
 18 should look like, how long it should take, and I just
 19 got very disillusioned. I mean, so my comment to the
 20 business at the time was that the Horizon --

21 **Q.** Sorry, the document can come down and can you move
 22 forward slightly to make sure those two microphones are
 23 angled towards your mouth.

24 **A.** Okay, is that better?

25 **Q.** A bit better. If you can keep your voice up.

14

1 should.

2 **Q.** So it wasn't the loss of the trials and the criticisms
 3 of the judge that prompted you to leave; it was
 4 disillusion with the Post Office delivering on its
 5 commitments?

6 **A.** For me personally, yes. I mean, I had had
 7 a conversation with Paula before we went into the trials
 8 that I was thinking of leaving the business and that was
 9 because I felt, at the time, I was being pigeonholed
 10 into the litigation and I wanted to explore other
 11 things, from a career perspective. So it wasn't
 12 something I hadn't discussed previously but, at that
 13 time, Paula had asked me to stay because of my extensive
 14 knowledge of the business and the fact that I'd, you
 15 know, been close with the initial investigation with
 16 Second Sight and the scheme. So I agreed to stay but,
 17 yeah.

18 But it was a personal thing for me. As you say, we
 19 weren't delivering on what we said we would, as quickly
 20 as I thought we should do.

21 **Q.** Did the revelations made by the Horizon Issues judgment
 22 not have any impact on you in terms of your career and
 23 decision to leave at all -- the fact that, for the first
 24 time, a person in authority, a High Court judge, had
 25 found the existence of, say, 30 bugs, errors and defects

16

1 that either had or had the potential to cause
 2 shortfalls, a fact that the Post Office had been denying
 3 for decades -- have some impact on you?
 4 **A.** I think -- well, that was, obviously, that was the final
 5 position. But, I think, as we went through the GLO, it
 6 was obvious as we were going through that things were --
 7 in terms of what I was seeing, it was stuff that
 8 I wasn't aware of before. So, for me, it was kind of we
 9 were on that journey anyway. The extent of the
 10 judgments, I think, was a surprise but, having gone
 11 through the whole process -- and I was -- you know,
 12 I did attend the two trials every day, you know, so
 13 I could see that coming together, as I went through. So
 14 it wasn't a complete revelation but -- and that actually
 15 didn't -- that wasn't the reason for me leaving the
 16 business. From my perspective, it wasn't my reason. It
 17 was the fact that, you know, we just weren't delivering
 18 on what we said we would deliver and I felt quite
 19 strongly about that.
 20 **Q.** Even though you had been directly involved in the Second
 21 Sight initial investigation and in the mediation
 22 process, neither of which had uncovered the bugs, errors
 23 and defects --
 24 **A.** Mm-hm, yeah.
 25 **Q.** -- that the judge found to have existed; that didn't

17

1 So things like -- things that I might have missed at
 2 the time, that I am -- I really regret that and wish I'd
 3 been able to see that back then.
 4 **Q.** But, still, knowing what you know now, in your witness
 5 statement you don't apologise for anything that you did
 6 wrong, do you?
 7 **A.** I apologise for not getting to the answer more quickly
 8 but, with the evidence I had and the parameters of my
 9 role at the time, I did the best I could and to the best
 10 of my ability.
 11 **Q.** What you say is you blame Fujitsu for not being
 12 transparent with you and the Post Office?
 13 **A.** Yes.
 14 **Q.** That's the third thing you say: you lay the blame at
 15 Fujitsu's door?
 16 **A.** Well, from my perspective, because, you know, we'd set
 17 up the Mediation Scheme, we had reached out to Fujitsu
 18 in terms of being able to get the information from them
 19 for us to be able to do the investigations. They'd put
 20 a project manager in place that we funded to be able to
 21 get access to the information that we needed. They knew
 22 what we were doing, yet we didn't get sight of any KELs.
 23 Now, I didn't know KELs existed and nobody that we were
 24 working with in the business knew that at the time.

What I've subsequently seen through the disclosure

19

1 have any impact on you at all?
 2 **A.** Well, I wish we had uncovered it but the evidence --
 3 from our investigations, the evidence just wasn't there
 4 to support it. But what I wasn't aware of and my team
 5 weren't aware of at the time, was the, you know, the
 6 amount of -- so the Known Error Logs, for instance, we
 7 weren't aware of the KELs at the time. So those things
 8 came out later as we were in the GLO process.
 9 **Q.** I think that's one of the five main things you say in
 10 your witness statement. I'm going to summarise your
 11 witness statement, if I may.
 12 **A.** Okay.
 13 **Q.** Firstly, I think you make no concessions or admissions
 14 that you did anything wrong, correct?
 15 **A.** Well, I didn't knowingly do anything wrong and I would
 16 never knowingly do anything wrong.
 17 **Q.** You don't apologise for your role in any of the events
 18 being examined in the Inquiry, do you?
 19 **A.** I think -- and I've reflected on this quite a bit and
 20 the disclosure that I've seen through this process,
 21 there are things that -- documents that I've seen that
 22 I don't remember some of them, from the time, but
 23 clearly, knowing what I know now, I would give further
 24 weight to some of those documents than I did at the
 25 time. So they would have more significance.

18

1 and what some of this did come out, as we were going
 2 through the GLO process, is that there were people
 3 within the organisation --
 4 **Q.** Within the Post Office?
 5 **A.** -- within the Post Office, that were aware of,
 6 I presume, Known Errors Logs, but I'm just talking about
 7 the Service Management Department, where they would be
 8 dealing with Fujitsu at that level on a daily basis and
 9 working that through. Now, that wasn't available and
 10 I certainly wasn't aware of that when we were going
 11 through the scheme.
 12 **Q.** That's the fourth thing you say: the first you knew
 13 about Known Error Logs, KELs, was in the course of the
 14 Group Litigation?
 15 **A.** Yes.
 16 **Q.** When in the course of the Group Litigation?
 17 **A.** I'm not really sure but -- and it wasn't the detail of
 18 the KELs; it was more KELs. So as we -- Andrew Parsons
 19 particularly was preparing the case and bringing papers
 20 to -- I think it was the PLSG, then that's probably the
 21 first time, and we started to have some queries coming
 22 in from the Legal team into me and then out to my team
 23 to be able to go and find some information on it. But
 24 that was the first time but I really can't put a date on
 25 it.

20

1 Q. You say, lastly, that you had no knowledge of any
2 material bugs in the Horizon system until the Second
3 Sight investigation reported in July 2013?
4 A. So at the point that we were feeding information to
5 Second Sight for the construction of that interim
6 report, then we disclosed two bugs, and that was
7 a surprise to me. I wasn't aware of those until that
8 point.
9 Q. Can I, before we get into the detail, just look at some
10 of the language you use and go back to your witness
11 statement at paragraph 29, on page 14, please. It'll
12 come up on the screen. The top paragraph, which is
13 paragraph 29, and the word before "memory", on the
14 previous page, is "From", you say:
15 "From memory, Second Sight were putting together
16 their report and the Legal Team said that they had been
17 made aware of a couple of anomalies which they needed to
18 disclose. This was the first I had heard of any bugs,
19 so it was a surprise ..."
20 Which is what you've just told us there.
21 A. Yeah.
22 Q. Then looking down the page, at paragraph 30, about three
23 or four lines from the bottom:
24 "As mentioned in the paragraph above, it was only
25 when [the Post Office] disclosed to Second Sight that

21

1 Q. Can we look, please, at POL00380985. We can see this is
2 an email from Paula Vennells to you, at about this time,
3 July 2013. We can see you are on the distribution list
4 there --
5 A. Yeah.
6 Q. -- in which she says:
7 "My engineer/computer literate husband sent the
8 following reply to the question:
9 ""What is a non- emotive word for computer bugs,
10 glitches, defects that happen as a matter of course?"
11 "Answer:
12 ""Exception or anomaly. You can also say
13 conditional exception/anomaly which only manifests
14 itself under unforeseen circumstances ..."
15 Do you remember this?
16 A. I hadn't remembered this but I have seen this. I think
17 it was brought up yesterday or in the course of this
18 phase, so I did remember it at that point.
19 Q. Was this acted on by you, that, rather than referring to
20 things as "bugs, glitches, defects", you should use the
21 words "anomaly" or "exceptions"?
22 A. So I don't believe I ever used the word "exceptions".
23 Anomalies -- so Simon Baker pulled together the
24 information to provide to Second Sight and he headed it
25 up "Anomalies", and that's why I just adopted the word

23

1 there were two anomalies within Horizon in 2013, that
2 there was any suggestion that the system was not
3 foolproof but, even then, a rational explanation was
4 provided by IT experts."

5 You refer in this statement in a number of places,
6 as we've seen here, to "anomalies".

7 A. Mm-hm.

8 Q. Did you choose that word because you wanted to
9 characterise bugs, errors and defects in Horizon as
10 something which is odd, peculiar or strange, ie the
11 definition of the word "anomaly"?

12 A. No, it was simply that's what -- that was the word used
13 at the time. So when -- I think it was Simon Baker was
14 involved and brought that to my attention, and I say the
15 Legal team, I think it was Andrew Parsons and Rod
16 Williams, that was the conversation that -- it was just
17 the word that was used at the time.

18 Q. Do you remember a diktat that the word "anomalies"
19 should be used?

20 A. Sorry, I missed that question.

21 Q. Do you remember a diktat, an instruction, a suggestion
22 that the word "anomaly" should be used --

23 A. No.

24 Q. -- over and above "bugs, errors and defects"?

25 A. No.

22

1 "anomaly" but, in my statement, I've referred to "bugs".

2 Q. Yes, you have in other places where we've asked you
3 a question about bugs, errors and defects.

4 A. Yeah. So I think from -- and I'm sure there is
5 a technical categorisation for each of bugs, errors and
6 defects; I don't know what that is.

7 Q. Reading this now, can you see this is an attempt,
8 through the use of language, to control the narrative;
9 Mr Blake might call it Orwellian?

10 A. Yes.

11 Q. Is that what it was like working in the Post Office at
12 this time, that language was controlled to lead the
13 narrative?

14 A. We certainly had, in all my time at Post Office and
15 Royal Mail prior to that, then we always had agreed
16 messaging so, you know, in terms of consistency of
17 messages and words that we would use. I didn't think
18 too much of this at the time. It was -- you know, the
19 important thing for me at the time was there were two
20 bugs, errors or defects, however you want to determine
21 them, that I wasn't aware of up until that point. They
22 were explained to me as -- you know, this -- you know,
23 every system has these things, it's -- how you deal with
24 it is important and we just moved on from there. But it
25 didn't strike me as something really unusual at that

24

1 point.

2 **Q.** What didn't strike you as unusual that --

3 **A.** The terms that we were --

4 **Q.** A preferred use of language?

5 **A.** Yes. So the agreed language that we wanted to use

6 there, this has come from Paula's note, was "anomaly"

7 and that's what Simon had put. So when he shared that

8 information, they were headed up "Anomaly".

9 **Q.** Looking at it now, can you see what perhaps sits behind

10 this?

11 **A.** Yes.

12 **Q.** What do you think sits behind it?

13 **A.** As you said, it's about controlling the narrative. It's

14 about using a consistent -- I don't think it actually

15 worked here because --

16 **Q.** Well, that's a different issue.

17 **A.** Yeah, because, you know, I've defaulted straight to

18 "bug" but it was -- I agree, it was an attempt to

19 control the narrative, in terms of what we were saying.

20 **Q.** What do you think the intended effect was to use

21 language of "exception" or "anomaly" rather than "bug"

22 or "glitch" or "defect"?

23 **A.** Well, I think from Paula's note she says,

24 "non-emotional" was that what she said there, but --

25 a "non-emotive word". I didn't think too much of it at

25

1 in privacy?

2 **A.** I didn't think so at the time.

3 **Q.** Does that mean, looking back, you can see how it sought

4 to do so now?

5 **A.** So, again, from the information I've seen as part of

6 this process, then I think there's -- there was

7 a tendency to do that.

8 **Q.** Did it seek to regulate its conduct and carry out its

9 communications in a way that maximised the possibility

10 of cloaking its communications in privacy, so that they

11 wouldn't have to be disclosed?

12 **A.** Again, I wasn't aware of that.

13 **Q.** Can we look, please, at POL00176467. Can we look,

14 please, to start with page 2. This is an email of

15 20 October 2011 to you, amongst others, from Emily

16 Springford. If we look at page 3, please, and scroll

17 down -- thank you -- we can see she was a Principal

18 Lawyer in Dispute Resolution, I think, in Royal Mail

19 Group?

20 **A.** Yes.

21 **Q.** Do you remember Emily Springford?

22 **A.** No, I'd never met her. This was the first --

23 **Q.** Go back to page 2, please. It's about disclosure and

24 evidence gathering in the context of the JFSA claims,

25 and it addresses three topics: document preservation,

27

1 the time. I mean --

2 **Q.** Do you think it's about emotion?

3 **A.** Well, I don't think it's about emotion.

4 **Q.** It's trying to suggest something materially different,

5 isn't it? An "exception" or "anomaly" carries with it

6 the implication that it's odd, that it's strange, that

7 it's peculiar.

8 **A.** Yes.

9 **Q.** Whereas a "bug", what does that suggest, or a "defect in

10 your system"; what does that carry with it?

11 **A.** I think, for me, it carries that -- it would be, could

12 be exceptional, in that we -- because we hadn't seen

13 many of them but I think the word of a "bug" is a bit

14 more routine. So there's, you know, that's what we

15 expect from that situation. As I say, I didn't give it

16 too much thought at the time. "Anomaly" is the word

17 that Simon put on to the information he shared and

18 that's why I've picked it up in my witness statement

19 because -- when I was referring to the documents but, as

20 I say, I've instinctively defaulted to "bug".

21 **Q.** Can I turn to a different aspect of information

22 handling, that of legal professional privilege. To your

23 knowledge, did the Post Office, from 2011 onwards, at

24 least 2011 onwards, seek to use claims of legal

25 professional privilege as a tool to cloak communications

26

1 document creation and the information that's needed to

2 respond to the letters of claim. I think you've seen

3 this?

4 **A.** Yes, I have.

5 **Q.** Thank you. We've seen it before and recently, so I'm

6 not going to read it out. Can we go to something new,

7 which your communication on page 1, please. Can we see

8 that you send this on to a collection of people:

9 Mr Breeden, Ms Norbury, Ms Richardson, Mr Wales,

10 Mr Lawrence, Ms Buchanan, et cetera. Yes?

11 **A.** Yes, that was my lead team, my direct reports.

12 **Q.** So you were sending it on to your team, yes?

13 **A.** Yes, I was.

14 **Q.** What did, in broad terms, the people who were in your

15 direct reports do?

16 **A.** So there was a mix. John and Lin were contract, they

17 managed the Contracts Advisers team. The rest then

18 were -- so this, just to give a bit of context, so this,

19 when I took over -- I took on additional

20 responsibilities, I think it was December, towards the

21 end of December 2010. This was the new team that came

22 together, so it was bringing different areas of

23 responsibility at the time. So Lin and John were

24 Contracts -- Contract Management Team, the rest had been

25 my existing team, which were managing the network of

28

1 provision of post offices opening, closures and also,
 2 I think at this point, I think I brought in the training
 3 and audit function into this as well.
 4 **Q.** Okay, and they would have had people working under
 5 them --
 6 **A.** Yes.
 7 **Q.** -- and people working under them, and would you expect
 8 them to distribute that to the people working to them?
 9 **A.** Yes.
 10 **Q.** So it would be cascaded down through the business in
 11 that way?
 12 **A.** Yes, it would, yes.
 13 **Q.** If we see, you forward Ms Springford's email and, in the
 14 second line, you say:
 15 "With the litigation being strong possibility our
 16 Legal Team has issued some advice, guidance and
 17 directives in the email below. Once you have read the
 18 email below yourself I then need you to action the
 19 relevant sections ... but I want everyone in our team to
 20 be aware of the need to:
 21 "[1] Preserve all documents which might potentially
 22 be relevant to these claims", and you set them out.
 23 **A.** Yes.
 24 **Q.** Then 2:
 25 "Mark communications in relation to these cases and
 29

1 to obtain legal advice, try to structure the document in
 2 such a way that its dominant purpose can be said to be
 3 evidence gathering for use in litigation."
 4 Now, without for the moment addressing the question
 5 of whether or not what Ms Springford advised was correct
 6 or appropriate, she was saying that, only where the
 7 dominant purpose of the document was evidence gathering,
 8 in connection with the litigation, might a document be
 9 said to enjoy privilege. That qualified her advice,
 10 didn't it?
 11 **A.** Yes.
 12 **Q.** What you advised, page 1:
 13 "Mark communications in relation to these cases
 14 [ie the list of cases] 'legally privileged and
 15 confidential' ..."
 16 You dropped the bit about only if the dominant
 17 purpose of the communication can be said to obtain or
 18 receive legal advice.
 19 **A.** That was me just summarising because I'd asked them to
 20 familiarise themselves with Emily's note, asked them to
 21 read it, and it was me just actually bringing their
 22 attention to this is important, I need you to be aware
 23 of what Emily is asking us to do and asking them to
 24 comply with that. So there was nothing else other than
 25 me just summarising.
 31

1 as detailed below as 'legally privileged and
 2 confidential' ..."
 3 Did you think that message really reflected
 4 Ms Springford's advice --
 5 **A.** Yes, I did.
 6 **Q.** -- ie mark all communications in relation to those cases
 7 "legally privileged and confidential"?
 8 **A.** Yes.
 9 **Q.** But that wasn't Ms Springford's advice, was it?
 10 **A.** So I thought I was just simply passing on
 11 Ms Springford's advice because, as I said, this was
 12 a fairly new team coming together, Lin and John
 13 particularly would have been aware of this, these type
 14 of requirements where the rest of the team wouldn't have
 15 been. So that was just me simply passing on the
 16 instruction and the requirements from Emily Springford.
 17 **Q.** What she had said, we can see it on page 3, second
 18 paragraph from the top, third line:
 19 "As litigation is now a distinct possibility,
 20 a document will be privileged if its dominant purpose is
 21 to give/receive legal advice about the litigation or to
 22 gather evidence for use in the litigation. This also
 23 applies to communications with third parties ..."
 24 Then first bullet point:
 25 "If the dominant purpose of the communication is not
 30

1 **Q.** Let's look at it this way: at the very least, you
 2 understood all communications in relation to those cases
 3 as now being legally privileged and confidential?
 4 **A.** Well, that's not what I've said. I've said "mark
 5 communication", I didn't say "all" but this was a new
 6 situation for me. I'd not been involved in disclosure
 7 before and a number of my team wouldn't have been
 8 involved in disclosure before. So this was me just
 9 passing on the requirements and the request from
 10 Emily --
 11 **Q.** You're not passing on it, are you? You're passing it on
 12 and then you say you want everyone in the team to be
 13 made aware of the need to do these three things --
 14 **A.** Yes.
 15 **Q.** -- and the second of those things is materially
 16 different from what she advised, isn't it?
 17 **A.** So it -- that wasn't my intention. This was just -- my
 18 intention was just to bring it to the fore of people's
 19 minds, in this newly formed team, so that they were
 20 aware of what we needed to do. And the other -- the
 21 third bullet point was making sure that they treated all
 22 of this as a priority because that, I think at the time,
 23 as it was played out to me, is the Legal team sometimes
 24 struggled to get the information they needed out of the
 25 business in the time --
 32

1 Q. You're talking about a different thing now, which is
2 about the priority of communications.
3 A. Yes.
4 Q. I'm talking about the second bullet point. So if we
5 just focus on the second bullet point, you at least
6 understood that all communications were to be treated as
7 legally privileged and confidential, didn't you?
8 A. That wasn't -- that's not what I was saying in here. As
9 I said, I just tried to summarise what Emily had asked.
10 Q. Why did you tell them to mark communications in relation
11 to those cases as "legally privileged and confidential",
12 when that's not the advice that had been received?
13 A. I can't remember back that far but, as I say, my
14 intention was only, really, to pass on what Emily had
15 asked and in terms of summary. I'd asked them to read
16 what she'd said. I can't remember any further
17 discussions after this and -- yeah, I can't remember
18 anything further after that, just in terms of whatever
19 we did, but, if there were any queries about what they
20 were doing, then they would have raised it at the time
21 and I can't remember any.
22 Q. Thank you. That can come down.
23 Can I turn, please, then to issues of substance and,
24 firstly, the question of remote access.
25 A. Okay.

33

1 Q. Different thing to what?
2 A. To actually getting it directly with, you know -- to
3 action. As I think I said in here, this was something
4 I wasn't aware of and hadn't been aware of previously,
5 and I don't actually remember receiving these emails.
6 And I did ask for -- you know, Post Office for "Can
7 I have my response to this", because --
8 Q. And there isn't one?
9 A. There isn't one.
10 Q. Okay. Well, put it this way: you got an email on
11 5 December, which said in terms that Fujitsu can
12 actually put an entry into a branch account remotely,
13 agreed?
14 A. That's what Lynn had dropped into her email, yeah.
15 Q. Let's try again. You had been given information on
16 5 December 2010 that Fujitsu can actually put an entry
17 into a branch account remotely, agreed?
18 A. In that email chain, yes.
19 Q. Thank you. Can we go forwards please to page 15 of your
20 witness statement, at paragraph 31. You say:
21 "Pre-2011, I had no knowledge of the ability of
22 Fujitsu employees to alter transaction data or data in
23 branch accounts without the knowledge or consent of
24 [subpostmasters]."
25 A. Yes.

35

1 Q. Can we turn to your witness statement on page 10,
2 please, at paragraph 19. I just want to examine what
3 you say in your witness statement about remote access,
4 and then go and look at some of the underlying
5 documents. You say:
6 "[A document] is [an] email from John Breeden to me
7 on 5 December 2010. I cannot recall this email or the
8 content of the pack he attaches. Having reviewed the
9 email, I have noted that Lynn Hobbs ... advised Mike
10 Granville and Rod Ismay that she had 'found out that
11 Fujitsu can actually put an entry into a branch account
12 remotely'."
13 Yes? So you're saying that, in an email that was
14 sent to you on 5 December 2010, you were told that it
15 had been discovered that Fujitsu can put an entry into
16 a branch account remotely, yes.
17 A. So Lynn had said that to John and then John had
18 forwarded Lynn's email to me.
19 Q. So it's the equivalent of you being given that
20 information?
21 A. Secondhand, yeah.
22 Q. Does that make a difference?
23 A. In as much as he was bringing it to my attention, for
24 information, so I think it was a slightly different
25 thing.

34

1 Q. Yes?
2 A. Yes.
3 Q. That's not right, is it, because you had been told about
4 it in the email of 5 December?
5 A. But, as I said, I don't ever remember seeing that in
6 December.
7 Q. That's a different thing, whether now you remember,
8 14 years later, receiving an email. You're saying in
9 the witness statement here "I had no knowledge of the
10 ability", whereas, in fact, you did have knowledge
11 because you'd been sent that email, hadn't you?
12 A. But without seeing that email as part of this, I would
13 have no knowledge, that's all I'm trying to say, is the
14 first conscious knowledge of that was the email from
15 Tracy Marshall, which would have been several weeks
16 after so. So the John Breeden email was, I think,
17 5 December and a month later this information came from
18 Tracy Marshall.
19 Q. So the lightbulb moment for you was not the Breeden
20 email of December 2010, it was the Marshall email of
21 January 2011?
22 A. Yes.
23 Q. Can we look at the Breeden email of 2010, then, please.
24 POL00088956. The first page is from Mr Breeden to you
25 and copied to a number of other people, yes?

36

1 A. Yes.

2 Q. He forwards a chain, if we look at the bottom of the
3 page. Ms Hobbs: do you remember who Ms Hobbs was?

4 A. Lynn Hobbs, I do, yes.

5 Q. Tell us?

6 A. Oh, sorry, she was the -- I think it was the General
7 Manager of the Support Network. John Breeden at this
8 time, and I can't remember the switch of
9 responsibilities to me, but John Breeden would be
10 reporting to Lynn, and had done for quite some time, as
11 did Lin Norbury.

12 Q. So did Lynn Hobbs indirectly report to you?

13 A. No, Lynn was more senior than me.

14 Q. I see. She says:

15 "This is the last email exchange I had with Mike
16 Granville about the BIS meeting. The attached documents
17 were what Mike was proposing to send to BIS. I haven't
18 seen anything further but I did have a conversation with
19 Mike about the whole 'remote access to Horizon' issue
20 ... The view being expressed was that whilst this may be
21 possible it's not something we have asked Fujitsu to
22 provide. I don't know what the final outcome was.

23 "I am also forwarding two further emails.

24 "One from Rod Ismay which is the final report he
25 produced as a [result of] a request from Dave Smith ..."

37

1 information, isn't it?

2 A. Yes. But, prior to this, I would have had no awareness
3 of any of this stuff.

4 Q. Which makes it even more significant, no?

5 A. In as much as I said this was something I wasn't aware
6 of and I don't recall seeing this, and then looking at
7 Lynn's note, which is quite a strange note, the way
8 she's dropped this into an email chain, which I find
9 quite strange.

10 Q. Strange for us too because we can find no record of it
11 anywhere else.

12 A. I've never seen an email like this before, where
13 something was just cut in. You'd normally forward that
14 email or attach it, so I find this really strange. But
15 I think at this point -- so Lynn left the organisation
16 shortly after, I think -- in looking at this, I think
17 this was just Lynn passing over to John things before
18 she left and John was coming into my team.

19 Q. Just taking a step back from this, this is an email
20 chain forwarding to you the Rod Ismay report, correct?

21 A. Yes.

22 Q. At the same time, it's forwarding you the Rod Ismay
23 report, it's telling you something about remote access?

24 A. Mm-hm.

25 Q. Yes? The beginning and end part of this bit that's cut

39

1 Then, over the page, please: "

2 "The second from Mike [Griffiths] with a document
3 that was sent to BIS in August as a briefing in advance
4 of Ed Davey's meeting with JFSA."

5 A. So that's Mike Granville.

6 Q. Sorry?

7 A. Mike Granville.

8 Q. Yes.

9 A. Sorry, you said "Griffiths".

10 Q. Then cut into Lynn Hobbs's email is her reply to Mike
11 and Rod, saying:

12 "I found out this week that Fujitsu can actually put
13 an entry into a branch account remotely. It came up
14 when we were exploring solutions around a problem
15 generated by the system following migration to [Horizon
16 Online]. This issue was quickly identified and a fix
17 put in place but it impacted around 60 branches and went
18 meant a loss/gain incurred in a particular week in
19 effect disappeared from the system. One solution,
20 quickly discounted because of the implications around
21 integrity, was for Fujitsu to remotely enter a value
22 into a branch account to reintroduce the missing
23 loss/gain. So [the Post Office] can't do this but
24 Fujitsu can."

25 I think you'd agree that's very significant

38

1 in is about the remote access and the bit in the middle
2 is about the context in which remote access has arisen,
3 correct?

4 A. Yes.

5 Q. So it's saying that there is a facility to put entries
6 into branch accounts remotely, it provides the context
7 in which that issue had arisen, 60 branches, and a fix,
8 and how do we correct the error that has occurred?
9 Shall we use this? No, let's not use this remote access
10 because that has issues of integrity about it but, in
11 any event, Fujitsu can do this?

12 A. Yes.

13 Q. That's what it's telling you?

14 A. Yes, it is.

15 Q. Can we go back to paragraph 16 of your witness
16 statement, please. It's on page 9, please. Scroll
17 down, please. You're dealing with the Ismay report
18 here. You say:

19 "Whilst I cannot recall receiving the report,
20 I assume I would have been reassured by its content at
21 the time."

22 You then say some stuff about knowing what you know
23 now --

24 A. Yes.

25 Q. -- and you say, in the last three lines:

40

1 "... notably the report says there is an 'absence of
2 backdoors' ..."
3 Yes?
4 **A.** Yes.
5 **Q.** Then you set out some information you now know. So
6 you're saying that you would have been reassured by the
7 contents of the Ismay report, yes?
8 **A.** Yes, but I don't -- I mean, I don't remember seeing that
9 in December. I definitely saw the Ismay report. I'm
10 not sure when. I thought it was a later date than that.
11 **Q.** Well, we know you got it on 5 December 2010 because we
12 have just looked at the email chain?
13 **A.** Yes, what I'm saying is I don't remember it from that
14 point but I do remember reading the report and I thought
15 it had it separately but not at the time that Rod put
16 that together, which I think was August.
17 **Q.** You say that you would have been reassured and,
18 seemingly, you would have been reassured because the
19 report said there was an absence of backdoors, yes?
20 **A.** Yes.
21 **Q.** But the very email chain that brought this report to
22 your attention said something very different, didn't it?
23 **A.** I'm not sure, for me, that registered as different.
24 I think --
25 **Q.** Let's look at what your reaction was, as a separate

41

1 I don't remember getting that email from John. So that
2 didn't register with me at the time. And the fact that
3 Lynn, who was more senior -- so just to put it into
4 context, Lynn -- so my direct report most into Sue
5 Huggins at the time, Sue and Lynn were peers, so Lynn
6 was senior to me. The fact that she'd mentioned in
7 there that she'd raised it with Andy McLean, who, again,
8 was at that level but in IT, and I think Mark Burley was
9 a Project Manager within that space as well, the fact
10 that she'd raised it and they were looking at it, but
11 she didn't have an update, I mean, when I look back,
12 there wasn't a sense of urgency about that that I would
13 have expected had she been really concerned about what
14 she'd learnt.
15 **Q.** That can come down, thank you. The importance of
16 Mr Ismay saying that there were no backdoors into
17 Horizon was that it meant all data entry or acceptance
18 was at branch level, correct --
19 **A.** Yes.
20 **Q.** -- and was tagged against the logon ID of the user,
21 correct?
22 **A.** Yes.
23 **Q.** The significance of that was the ownership of all
24 accounting was truly at branch level, correct?
25 **A.** Mm-hm.

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1 question, to what the facts are. You would agree that
2 the very email chain that brought the Rod Ismay report
3 to your attention said something very different about
4 the absence of backdoors, didn't it?
5 **A.** Well, it didn't mention backdoors. It said that they
6 could inject --
7 **Q.** Fujitsu could remotely access --
8 **A.** Yes --
9 **Q.** -- and inject transactions?
10 **A.** So I think the backdoor bit is quite different, I think.
11 So, for me, the absence of backdoors feels that that's
12 done in an uncontrolled way, whereas, if they could
13 inject, you know, which I later learnt about the
14 balancing transaction, which is that kind of scenario,
15 so I think for me the two just didn't -- they're not the
16 same thing to me.
17 **Q.** What's the difference?
18 **A.** So, as I say, I think the backdoor is, I think, more of
19 an uncontrolled way, whereas the injecting is done in
20 a controlled way.
21 **Q.** So do you think you made that distinction at the time?
22 **A.** Probably not.
23 **Q.** This you rationalising it now?
24 **A.** And because I know more now than I knew then. So
25 I think, at the time, then, as I say, I didn't --

42

1 **Q.** The email that we looked at was saying that ownership of
2 accounting was not at branch level, wasn't it? It was
3 saying that Fujitsu can remotely inject transactions,
4 can alter it?
5 **A.** Yes.
6 **Q.** Did that not undermine, in your mind, what Mr Ismay had
7 said?
8 **A.** I think the difference -- and I think this is the
9 important bit for me -- was, if something were to be
10 injected into a branch accounts, was it with the
11 knowledge of the postmaster whose accounts they were?
12 And I think that's a really important aspect of it.
13 **Q.** The email didn't say anything about the knowledge of the
14 postmaster did?
15 **A.** It didn't say either way, whether they were aware or
16 not, no.
17 **Q.** It was saying that, if we did do it, there would be
18 issues about integrity --
19 **A.** Yes.
20 **Q.** -- didn't it?
21 **A.** Mm-hm.
22 **Q.** Do you think that was hinting or suggesting that this
23 was all being done above board with the knowledge of
24 subpostmasters?
25 **A.** I didn't really think about it at the time.

44

1 Q. Can we go to the email, please, POL00088956. So this is
 2 the chain that forwards you the Ismay report in December
 3 2010. How well did you know Rod Ismay?
 4 A. Not very well at that point. So he was -- we were part
 5 of the senior leadership team and we periodically got
 6 together for conferences and things like that, but --
 7 Q. Would you meet him on a monthly basis?
 8 A. No.
 9 Q. How frequently was your contact?
 10 A. I wouldn't have met him, in terms of the course of my
 11 role prior to this. So this was the first time -- so
 12 stepping into this role was the first time that I really
 13 started to work with Chesterfield, which is where -- Rod
 14 was in charge of Chesterfield. Prior to that,
 15 I wouldn't have had much involvement with Rod at all.
 16 Q. So he was Head of Product and Branch Accounting at that
 17 time?
 18 A. That later became Finance Service Centre but, yeah.
 19 Q. If we go to page 2, please, we can see that Lynn Hobbs'
 20 email went to Rod Ismay originally, yes?
 21 A. Yes.
 22 Q. Because it's addressed to Mike and Rod and she has
 23 written in to her own email "My reply to Mike and Rod".
 24 You say you think this is a very strange way of writing
 25 emails --

45

1 A. Mm-hm.
 2 Q. You were tending to suggest a moment ago that you did
 3 not see this email?
 4 A. Yes.
 5 Q. How are you able now to say positively you did not see
 6 this email?
 7 A. So what I'm saying is I don't remember seeing it and the
 8 fact that the way it's constructed is really strange,
 9 and I think that I would have remembered that at the
 10 time because it strikes me as a bit -- being really,
 11 really strange.
 12 Q. Did you read your emails?
 13 A. Yeah, normally.
 14 Q. Would there be any reason not to read an email?
 15 A. Volume of work.
 16 Q. What about one that's about briefing the sponsor
 17 department, the Department of Business, Innovation and
 18 Skills?
 19 A. So, as I said, this was a new work area for me, I hadn't
 20 been involved in this type of work before. I think
 21 5 December, I think, was a Sunday because I've looked to
 22 see why, you know, I've not picked this up, but I tended
 23 to -- I tended to read all my emails but I also tended
 24 to respond to all my emails as well, and this is what
 25 strikes me as really odd because I didn't have

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1 A. Yes.
 2 Q. -- the cutting and pasting something into your own
 3 email, rather than either attaching that email or
 4 forwarding it?
 5 A. Yes.
 6 Q. As I've said, we haven't had disclosed to us, there's no
 7 trace whatsoever, of the email in Mr Ismay's inbox. Are
 8 you saying that, at the time, you would have regard it
 9 as suspicious that this had happened?
 10 A. Yes. As I said, I don't recall seeing this and that
 11 would have struck me as being really strange. I just
 12 find it a very strange way to do something because my --
 13 whatever -- and how I saw things during my time at the
 14 Post Office is you either had the email forwarded or it
 15 was as an attachment. So you had the complete chain of
 16 communication regarding whatever the topic of that was.
 17 So just coming back to that, so I think, had I seen
 18 this, this would have struck me as being really odd,
 19 which is why I think I didn't see it.
 20 Q. Are you saying you did not see an email that was sent to
 21 you?
 22 A. Yeah, I don't recall --
 23 Q. That's a different issue. If we just go back to page 1.
 24 Whether 14 or so years on, you can now remember
 25 receiving an email is one issue.

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1 a response to this one.
 2 Q. In any event, the Ismay report was brought to your
 3 attention in the context of a discussion about what had
 4 been said to the Department of Business, Innovation and
 5 Skills, earlier in 2010. Would you agree, looking at it
 6 now, that Mr Breeden's emails did not make it clear
 7 whether the Department had been told about Fujitsu's
 8 ability to tamper with branch accounts?
 9 A. Yes.
 10 Q. Would that not have been a very important issue for you
 11 to have got to the bottom of?
 12 A. I said at the time this was a new area for me and
 13 I wouldn't have given it that much attention. So the
 14 people who would have been involved in that would be
 15 Mike Granville, that was his role, and Sue Huggins, who
 16 was my boss and I think Mike Granville reported into Sue
 17 at one point, as well. That was her area. So it
 18 wouldn't have registered with me at the time.
 19 Q. But there was a possibility that the single shareholder
 20 had been told that the Post Office had got a significant
 21 issue on its hands namely its supplier could tamper with
 22 branch accounts?
 23 A. Yes.
 24 Q. Wouldn't that be something that you would want to get to
 25 the bottom of: what has Government been told?

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1 A. As I said at the time, this didn't register. One,
 2 I don't believe I saw it but, actually, it didn't
 3 register because, prior to this -- I mean, this was the
 4 first time of me getting involved in anything to do with
 5 Horizon integrity. Prior to that, from the time --
 6 Q. I'm sorry, Ms van den Bogerd, the point I'm making is
 7 that it's in the context of the single shareholder, the
 8 Government --
 9 A. Yes.
 10 Q. -- being briefed and, therefore, it's very important to
 11 find out what has been said to Government and what the
 12 true position is.
 13 A. Mm-hm.
 14 Q. What you tell us -- you've told us today and what you've
 15 said in your witness statement -- is that there might be
 16 good reasons why there's no follow-up to this --
 17 A. Yes.
 18 Q. -- on paper, because Lynn Hobbs left the organisation
 19 shortly afterwards?
 20 A. Yes, or that it was -- it had been dealt with. I saw
 21 nothing coming out after this to tell me, well, actually
 22 what had happened to it or that there wasn't a problem.
 23 Q. Was this dealt with offline, ie so as not to leave
 24 a paper trail?
 25 A. Not that I'm aware of.

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1 A. Sorry, not at the time I didn't.
 2 Q. Yes. Nor in December 2010 or January 2011?
 3 A. No.
 4 Q. Can we go to page 3, please, and scroll down. Can you
 5 see the proposals for how the bug was to be addressed in
 6 relation to the affected branches? Can you see under
 7 "Solution One", the proposed solution one was to alter
 8 the branch figure at the counter to show the
 9 discrepancy. Fujitsu would have to manually write
 10 an entry value to the local branch account.
 11 The "Impact" would be when the branch comes to
 12 complete the next trading period they would have
 13 a discrepancy that they would have to bring into
 14 account.
 15 The "Risk" was:
 16 "This has significant data integrity concerns and
 17 could lead to questions of 'tampering' with the branch
 18 system and could generate questions around how the
 19 discrepancy was caused. This solution could have moral
 20 implications of the Post Office changing branch data
 21 without informing the branch."
 22 Would you agree that this record, even though that
 23 solution was not, in the event, adopted, makes it clear,
 24 firstly, that Fujitsu could tamper with branch accounts
 25 remotely?

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1 Q. Was it dealt with by verbal discussions only?
 2 A. I say, I'm not -- not that I was aware of. Whether
 3 those conversations happened -- because I would have
 4 expected the follow-up to that to have happened with
 5 Lynn, Andy McLean, who she said she'd referred it to,
 6 and Mike Granville, and also Mark Burley. So I'm not
 7 aware of anything as a result of this email pack.
 8 Q. Thank you. That can come down.
 9 The email, as we've seen, referred to the context in
 10 which the discovery of remote access had been made.
 11 A. Mm-hm.
 12 Q. Remember? The incident that had been discussed in
 13 a meeting involving 60-odd branches back in October
 14 2010.
 15 A. Yes.
 16 Q. Yes? Can we look, please, at that. POL00028838. This
 17 is, I think, the only record that we have of either what
 18 happened or what was to happen at that meeting in
 19 October 2010. If we look at the attendee list, I think
 20 we can see that there are six members of the Post Office
 21 present and they're the first six on the list.
 22 A. Yes.
 23 Q. Did you have responsibility for any of those?
 24 A. No.
 25 Q. Can we turn to page 3, please?

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1 A. Yes.
 2 Q. And, secondly, they could do so without the branch being
 3 able to see it or to know about it?
 4 A. Yes.
 5 Q. Did you speak to any of the six people on the attendee
 6 list after receiving the Lynn Hobbs email?
 7 A. No.
 8 Q. Did any of those people draw subsequently those two
 9 material facts -- Fujitsu can tamper with branch
 10 accounts remotely and they can do so without the branch
 11 being able to see it or to know about it -- to your
 12 attention?
 13 A. No.
 14 Q. Would you agree that those two facts, if they were to
 15 have emerged, would have significantly undermined the
 16 reputation and integrity of Horizon?
 17 A. Yes.
 18 Q. At this time, October 2010 into January 2011, the Post
 19 Office was wedded to maintaining the reputation of
 20 Horizon, wasn't it?
 21 A. Not to my knowledge. I mean, I wasn't aware of this
 22 document until much later in the GLO --
 23 Q. How has it happened that this additional record, in
 24 addition to the December 2010 email chain, hasn't found
 25 its way to you; what's gone wrong?

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1 A. Well, I think back in 2010, then I wasn't involved in
 2 any -- anything to do with Fujitsu or Horizon issues; it
 3 was only -- I only started to get involved in '20, so
 4 there was the Tracy Marshall email which was in advance
 5 of the Ferndown meeting that I intended and, again, that
 6 was me just coming into that because my boss, Sue
 7 Huggins at the time, was out on holiday, and then we
 8 came into the Shoosmiths letters about the individual
 9 branches. So this wasn't my domain at all.
 10 Q. But you were beginning to look into Horizon integrity at
 11 the end of 2010/beginning of 2011, weren't you?
 12 A. No, not -- no, I wasn't really. So it was really only
 13 when Second Sight became -- came into the business when
 14 I started to work with them around the Spot Reviews. So
 15 that's where I would say I stepped into looking at this
 16 type of -- these type of issues. Prior to that,
 17 I wasn't.
 18 Q. Or was it that you and others within the Post Office
 19 studiously avoided lifting the lid on what had happened
 20 at the meeting of October 2010, when the receipts and
 21 payments mismatch bug was not only discovered but also
 22 was revealed Fujitsu's ability to tamper with the branch
 23 accounts?
 24 A. I wasn't aware of this and I wish I had been aware of
 25 this at the time because that fundamentally changes what

1 A. Yes.
 2 Q. Her title was Agents Development Manager. Can you
 3 explain what that was, please?
 4 A. I don't actually remember what she was doing at the
 5 time.
 6 Q. What relation did she have to you and your work?
 7 A. Not an awful lot, at that point.
 8 Q. Why was she writing to you?
 9 A. So it was to Kevin really. So I think Kevin had asked
 10 her -- I think she was part of Kevin's team. I think
 11 Kevin had asked her to do something. I don't remember
 12 having any conversation with Tracy about this until
 13 I got the email.
 14 Q. Do you know what the context was for Kevin asking?
 15 A. It was the Ferndown meeting. So I'd been asked to, as
 16 I said earlier, to attend this. It wasn't something
 17 I would normally do but Sue Huggins, who was my line
 18 manager at the time, who reported to Kevin, was on
 19 holiday; she'd asked me to step in.
 20 Q. So the subject is, "Horizon system issues", and item 2
 21 reads "[The Post Office] or Fujitsu having remote access
 22 to individual Horizon systems". The first paragraph:
 23 "[The Post Office] cannot remotely access systems
 24 and make changes to specific stock units etc. Fujitsu
 25 can remotely access systems and they do this on

1 my understanding was to do with Horizon system and, even
 2 just the language used in here, clearly it was known.
 3 And the fact -- and you can't get away from this on this
 4 document, that they were consciously deciding what to do
 5 and what not to do and not to share, and that's hugely
 6 alarming.
 7 MR BEER: Thank you. Sir, that might be an appropriate
 8 moment for our new system of two 10-minute breaks to
 9 take the first of them. Can we say until 11.10, please?
 10 SIR WYN WILLIAMS: Certainly, Mr Beer.
 11 MR BEER: Thank you.
 12 (11.03 am)
 13 (A short break)
 14 (11.15 am)
 15 MR BEER: Sir, good morning. Can you see and hear us.
 16 SIR WYN WILLIAMS: Yes, thanks.
 17 MR BEER: Ms van den Bogerd, can we turn to the second
 18 series of correspondence relevant to the issue. We've
 19 seen that you referred, in your paragraph 19 to an email
 20 that you received from Tracy Marshall, dated 5 January
 21 2011.
 22 A. That's right.
 23 Q. Can we turn that up, please. POL00294728. Can you see
 24 at the top it's an email dated 5 January to you and
 25 others from Tracy Marshall?

1 a numerous occasions on a network wide basis in order to
 2 remedy glitches in the system created as a result of new
 3 software upgrades.
 4 "Technically, Fujitsu could access an individual
 5 branch remotely and move money around however this has
 6 never happened yet. The authority process required and
 7 the audit process are robust enough to prevent this
 8 activity from being undertaken fraudulently. The
 9 authority process itself would take several days and
 10 would require a number of representatives from the
 11 business to provide concurrence to the activity
 12 (including Head of Network Services). If a change were
 13 made remotely and to an individual branch it would be
 14 flagged on the business data ledgers and would appear as
 15 a 'mismatch' in P&BA in Chesterfield. P&BA would then
 16 investigate to determine whether the mismatch was
 17 authorised internally or not.
 18 "So although changes can be made remotely, they
 19 would be spotted and the person making the change would
 20 be identified."
 21 Now, the Inquiry has heard evidence that suggests
 22 that the claim that Fujitsu had never used its
 23 capability to access individual branches and move money
 24 around is incorrect. By the time you received this
 25 email, did you know that?

1 A. No.

2 Q. The Inquiry has received evidence that the authority
3 process/audit process to prevent the activity from
4 occurring was not robust and that there wasn't
5 sufficient assurance that it was not being used
6 fraudulently. At that time, did you know that --

7 A. No.

8 Q. -- receive evidence to that effect?

9 A. No.

10 Q. The Inquiry has heard evidence that Fujitsu would
11 sometimes use a subpostmaster's user ID to inject
12 transactions into branch accounts, so that the standard
13 ARQ data produced subsequently could not distinguish
14 between injected transactions and those made in the
15 branch. Did you know that at the point of receiving
16 this email?

17 A. No.

18 Q. The Inquiry has received evidence that there was
19 unauthorised and un-auditable privileged user access by
20 Fujitsu. Had you heard about that by the time of
21 receiving this email --

22 A. No.

23 Q. -- or how long it had been in operation for --

24 A. No.

25 Q. -- and what a concern it had been within Fujitsu that

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1 close to this branch, if she needed me to.

2 And that was the first I became aware of anything to
3 do with -- and I can't remember when, it would have been
4 a few months or leading into this because I don't
5 remember when the audit and the suspension actually took
6 place. But that's the context, that's what I was aware.
7 I knew it was high profile because Lynn had told me, and
8 I believe Dave Smith was the MD at this point and he had
9 got involved. Paula would have been the Network
10 Director at this point, I think.

11 Q. That can come down. Thank you.

12 The issue at Ferndown had involved an unexplained
13 loss shown on a dormant stock unit --

14 A. That's right.

15 Q. -- do you remember?

16 A. Yes.

17 Q. A relatively small amount of money, I think --

18 A. I think so. I think it was hundreds, as opposed --

19 Q. £700, I think.

20 A. Yes.

21 Q. So you attend this interview at Old Street. Can we look
22 at the transcript of the interview, please.

23 POL00294743. What was the purpose of the interview?

24 A. So from my -- my understanding, it was to re-establish
25 the relationship because, I think, as a result of the

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1 this privileged user access existed and was unregulated?

2 A. I had no knowledge of any of that.

3 Q. I'm told that you need to speak up --

4 A. I'm sorry.

5 Q. -- significantly, please?

6 A. Significantly. Okay.

7 Q. The month after you received this email -- sorry, within
8 the month, I think it's the next day -- you interviewed
9 Mrs Rachpal Athwal in Old Street London, yes?

10 A. That's correct.

11 Q. This is the Ferndown branch with which she was concerned
12 in Dorset; is this right?

13 A. That is correct.

14 Q. She was the subpostmaster of that branch, wasn't she?

15 A. She was.

16 Q. Can you summarise what had happened to Mrs Athwal?

17 A. Sorry, I wasn't involved in what had happened. From
18 memory, there had been an issue on audit and she had
19 been suspended. The first I became aware of it and
20 I put this in my statement, was when Lynn Hobbs
21 contacted me because my role at the time was providing,
22 as I said, network services, branches, opening and
23 closings, but also providing mobile Post Office services
24 as well, and she'd asked me if -- would I be able to
25 provide a mobile post office outside this branch or

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1 suspension and some of the issues around that, that
2 there was a breakdown in the relationship. So that's
3 what I thought the purpose of the meeting was.

4 Q. To re-establish the relationship between the Post
5 Office, on the one hand, and the --

6 A. And the subpostmistress.

7 Q. -- sub --

8 A. Well, Mrs Athwal was the subpostmistress but it was
9 actually Val, her husband, who was the most vocal in the
10 meeting and I understood, at this time, that Val had
11 been talking to the press, and things like that. But it
12 was essentially to, you know, so -- Mrs Athwal had been
13 reinstated and -- at this point, and it was really just
14 about reestablishing that relationship, which is what
15 Kevin was looking to do.

16 Q. If the purpose was to re-establish the relationship, why
17 was the meeting tape recorded?

18 A. I don't know, actually. Because it wasn't typical that
19 we would have recorded these type of meetings. I don't
20 know, but it was, and that would have been, I think,
21 probably at Kevin's -- I'm not sure. I didn't really
22 question it.

23 Q. If we look, we can just see the explanation given by
24 Mr Gilliland. Thank you:

25 "So just for the record again the purpose of

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1 recording the interview is to make sure we've got
2 a factual record of the meeting and we've agreed that
3 the content of this meeting will remain confidential and
4 the information discussed is not to be shared with other
5 parties unless the expressed permission of all
6 [attendees] around this room is given.

7 Mr Athwal says:

8 "... I have a problem with that ..."

9 A. Yes.

10 Q. Again, can you help us, if you're trying to re-establish
11 the relationship between a husband and wife
12 postmaster/mistress team, why do you tape them?

13 A. As I said, that wasn't my decision and it's something
14 that didn't normally -- we didn't normally do. The only
15 time we would have recorded interviews is where it was
16 one person, from Post Office perspective, having
17 a meeting with somebody else, is what we would normally
18 do. Otherwise, we would take notes. So I don't know.

19 I mean, I don't recall having any kind of pre-meet
20 with Kevin on this. As I say, I'd stepped into this
21 because my boss wasn't available. So, as I say, I can't
22 add anything further to that, I'm afraid.

23 Q. We can just scroll up and see had was present:
24 Mr Gilliland and you, Helen Rose; why was Helen Rose
25 there?

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1 A. Yes.

2 Q. -- and there needed to be some technical explanation of
3 investigation of that, didn't there?

4 A. You say, "AB", that's you:

5 "Helen has looked at the information from the logs
6 ... and has taken that information and put it into
7 a working file for herself so she can, 'cos as you
8 appreciate that's an awful lot of data that would be for
9 that branch and put it on there and can track where that
10 amount of money has moved through the system in your
11 branch so she can talk you through that and we can do
12 that [right] now."

13 Mr Baker, if we can see what he says, about four
14 lines in, he asks the question:

15 "... was it something that someone did in the branch
16 or was it something the system has done ..."

17 Can you see that?

18 A. Yes, I can.

19 Q. Then if we can go forward, please, to page 11. I'm just
20 reading these to give you a bit of context of what the
21 issues are, towards the foot of the page, about eight
22 lines in, starting with the item 152, Mr Gilliland says:

23 "Well we can pinpoint where the figures have come
24 from that's not true, we can pinpoint where every figure
25 comes from."

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1 A. Helen Rose was part of the Security Team and I think she
2 was an analyst, I'm not sure -- I'm not sure whether I'd
3 asked her or Lynn had asked her to look at the
4 information so that we could establish what had happened
5 in the branch, and that was Helen's role.

6 Q. Then Mr and Mrs Athwal and Mark Baker from the
7 Federation. Can we go forward to page 3, please, the
8 top of the page and this Mr Baker speaking.

9 "So have you moved forward from where we left with
10 Andy Bayfield when he did the appeal and he accepted, he
11 accepted during the interview that the initiation of the
12 stock unit that had been closed down some months prior
13 that came in, to use Rachpal's words, came back into
14 life with money in it, he said that could only be caused
15 by one or two ways and that was either by a human
16 physically doing that within the branch or it has been
17 generated by the computer itself for one reason or
18 another and he was going ... away and get to the bottom
19 of that and as far as I'm concerned on a technical issue
20 that's where I still am waiting to find out how this
21 happened."

22 That was accurate, wasn't it, that Mrs Athwal had
23 been reinstated but there remained a mystery how on
24 a closedown of a dormant stock unit, how money had
25 suddenly appeared in it --

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1 Mr Athwal: "Can you manipulate those figures from
2 behind the scenes?"

3 Mr Gilliland: "No, we can't."

4 Mr Athwal "No, you can't get into the system ..."

5 Answer: "No."

6 Mr Athwal: "You cannot get into the Horizon system?"

7 Mr Gilliland: "No."

8 Over the page he says: "Yes, you can?"

9 Mr Gillibrand says: "No, we can't, no, we can't."

10 Then you say:

11 "Nobody in [the Post Office] can get into the
12 system, anything that you've seen on the screen has been
13 logged against a user, logging in on the system against
14 a password that only that individual should have in
15 office, we don't want to know what passwords are so we
16 cannot access those systems at all."

17 In the light of the email that you'd received the
18 month before on 5 December, what you said there wasn't
19 true, was it?

20 A. So on 5 December Lynn said Post Office can't, Fujitsu
21 can, and that's what I've said there, that nobody in
22 Post Office can get into the system.

23 Q. Oh, come on, Ms van den Bogerd. Are you saying that
24 what you said overall there is accurate?

25 A. So that is accurate. We go on to talk later about

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1 Fujitsu, I believe, but, in terms of what I said there,
 2 that was accurate: post Office -- nobody in Post Office
 3 can get into the system then and I still don't think
 4 anybody can now, even today even four years after I've
 5 left the business.

6 **Q.** It was inaccurate by not being a full account, wasn't
 7 it?

8 **A.** So --

9 **Q.** "Nobody in Post Office can do this but we found out that
 10 people in Fujitsu can", that would be the open and
 11 transparent thing to say, wouldn't it?

12 **A.** So, at the point here, as you can tell from the notes
 13 here, it's quite -- it was quite confrontational between
 14 Val and Kevin, and I came in at this to try and calm, so
 15 that we could actually start having a proper
 16 conversation there. But what I've said there is
 17 correct: nobody in Post Office can get into the system,
 18 and then Val went on to say about Business Development
 19 in the Chesterfield team and still nobody in Post Office
 20 can get into the system.

21 **Q.** Did you think that was the honest thing to do, to only
 22 talk about Post Office, when you knew very well about
 23 Fujitsu's facility remotely to access branch accounts?

24 **A.** So I think it was important in terms of the distinction.
 25 Nobody in Post Office can, and that's what I was saying.

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1 any of the data.
 2 "Fine."
 3 Why were you not being open about Fujitsu access?

4 **A.** All the information I had was what Tracy had put into
 5 the email the day before.

6 **Q.** So you had the email from Mr Breeden of 5 December?

7 **A.** But what I've said is that I didn't remember seeing that
 8 email from John Breeden at the time, so this is really
 9 my first recollection of anything to do with questioning
 10 the system.

11 **Q.** This is within a month of receiving that email, almost
 12 to the day. It's about the very same subject matter.

13 **A.** Yes.

14 **Q.** Are you saying you airbrushed it from your mind?

15 **A.** Well, I don't remember even seeing it, so unless -- and
 16 that's what I struggle with, because --

17 **Q.** Maybe we struggle with it too. Is what is truly
 18 happening here that you're telling us that you don't
 19 recall it because you know that the email of 5 December
 20 2010 presents you with a problem?

21 **A.** No, not at all. I mean, I wish I had remembered that
 22 information, because that, coming into this meeting with
 23 the further information would have been -- I would have
 24 known a lot more but, in this meeting, I came in on the
 25 back of the email that came in the day before from Tracy

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1 The conversation goes on but all I was doing at that
 2 point was distilling the confrontation exchange between
 3 Kevin and Val.

4 **Q.** It carries on:

5 Mr Athwal: "Okay you probably can't but your
 6 Business Development or whoever they are in Chesterfield
 7 can."
 8 "No nobody in [the Post Office] can do that", you
 9 say.

10 Mr Athwal: "Are you sure about that do you want to
 11 go back and ask somebody."
 12 You: "I've already asked."
 13 "You have well, I've got some contacts as well
 14 within Fujitsu and I've asked them okay and these will
 15 come out in the open later on."
 16 "And what did they tell you did they tell you that
 17 people in [the Post Office] can access?"
 18 "Yes."
 19 "[The Post Office] cannot categorically access
 20 information in branch because it's all done against
 21 a user ID."
 22 "Fine I'm not going to argue with you over it, I'm
 23 not going to argue over it."
 24 Then Mr Gilliland: "But it's a fact nobody in [the
 25 Post Office] can access Horizon, they can't manipulate

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1 into this meeting. So that was my first recollection of
 2 that information. So the December note from John had no
 3 bearing on me in this meeting.

4 **Q.** Why? It's about remote access, this is about remote
 5 access.

6 **A.** But -- because I said I don't remember seeing that
 7 email. So that -- if I hadn't seen it, then I wouldn't
 8 have taken that knowledge into this meeting. This, for
 9 me, was the first time that I'd actually seen -- in my
 10 head, seen anything to do with remote access and, as
 11 I said previously, in my other roles, this hadn't come
 12 up as an issue.

13 **Q.** Can we go forwards to page 47, please.

14 **SIR WYN WILLIAMS:** Can I take it, Mr Beer, that, in the
 15 parts of transcript which immediately follow the
 16 exchange you've been looking at, the issue of whether or
 17 not Fujitsu could gain remote access doesn't arise?

18 **MR BEER:** That's correct, sir.

19 **SIR WYN WILLIAMS:** Yes, fine.

20 **MR BEER:** Can we go forward, please, to page 47 and scroll
 21 down to entry 857. You say:
 22 "You claim there's a glitch in the system in
 23 reference to the £436.81."
 24 I think that's part of the £700 that showed up on
 25 the stock unit. Mr Athwal says:

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1 "And the £400 on the audit that they carried out."
 2 You say: "We have demonstrated for the information
 3 that we have."
 4 He interrupts and says:
 5 "No, you haven't you've satisfied yourself you
 6 haven't satisfied me."
 7 You say: "Well I have satisfied myself yes because
 8 I have seen the information and that is down to a user
 9 at Ferndown under a password only known to that person
 10 who has accessed that system, nobody else could have
 11 done that so therefore I am satisfied that that was not
 12 a glitch in the system."
 13 He says: "But the £400 transferred out of the safe
 14 into a stock unit with a recipient on that stock unit
 15 wasn't even logged on, didn't even work that day, how do
 16 you explain that?"
 17 You say: "Well I haven't looked at the evidence so
 18 I can't but I'm sure given that I am confident in the
 19 system."
 20 You started this interview by asserting to the
 21 subpostmaster and her husband that the security of user
 22 ID was important, didn't you?
 23 **A.** Yes.
 24 **Q.** You knew, on the basis of both the email of 5 December
 25 2010 and the email of 5 January 2011 that Fujitsu could

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1 **A.** Because, as I say, I didn't remember seeing that email
 2 and, therefore, that had no bearing on my discussion at
 3 this meeting, so the information I took into this
 4 meeting was from the Tracy Marshall email that came in
 5 the day before.
 6 **Q.** So this is a month after you received the Hobbs/Breeden
 7 email. Why wasn't that ringing any bells for you?
 8 **A.** Because, as I said previously, I don't recall receiving
 9 that email and the contents of that email hadn't
 10 registered, if I had seen it, and I don't believe I did
 11 because, as I've said earlier, it would have stuck in my
 12 mind because of the way that email was constructed,
 13 because it's very strange. So I do not believe I had
 14 seen the contents of those emails coming in to this
 15 meeting.
 16 **Q.** How was Tracy Marshall qualified to tell you about the
 17 integrity of the Horizon system?
 18 **A.** So Tracy Marshall herself was passing that on from --
 19 I forget who she said. I think it was Andy McLean
 20 again. I think it was referenced he would have been the
 21 very senior person in IT.
 22 **Q.** She says that she had had conversations with Andy McLean
 23 and Dave Hulbert?
 24 **A.** Okay, so Dave Hulbert, again, is a very senior person in
 25 the IT function so whilst Tracy -- and I can't speak for

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1 remotely access the system?
 2 **A.** So, as I said, I don't remember the 5 December one but
 3 on the email that Tracy sent to me, that was all the
 4 information that I'd been provided with on that -- at
 5 that point.
 6 **Q.** Can we go back to page 41, please. Mr Baker says:
 7 "As you can appreciate it is a very simple computer
 8 at the end of the day sitting at the end of an ISDN line
 9 and if someone knows what they are doing, they could
 10 hack [it], if they've got the access rights but of
 11 course records would be kept to that somewhere 'cos you
 12 can't even look at a computer without it keeping a log
 13 of what's gone on."
 14 You say: "As an audit trail."
 15 He says: "But you know it is technically ultimately
 16 someone within Fujitsu could get into a unit and do
 17 whatever they need to do."
 18 You say: "Not without being seen to have done that
 19 Mark."
 20 Mr Gilliland says: "... this is military level
 21 security we've got [with Horizon], it's highly
 22 encrypted, it's very safe, it meets all the external
 23 tests ..."
 24 Why didn't you reveal what you had learnt in the
 25 email of 5 December?

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1 Tracy's knowledge of Horizon or for IT capability, she
 2 wasn't an IT person, but Tracy would have had the
 3 experience and known that, if Kevin had asked her to get
 4 some information, that it would have been really
 5 important that she got the information and passed it on
 6 as she had received it, which is what I believe she did
 7 in the email.
 8 **Q.** You were being challenged here by a trusted
 9 subpostmaster and her husband, weren't you?
 10 **A.** I didn't know them and I had no doubt to dispute that
 11 they were other -- anything other than trusted.
 12 **Q.** Did you do anything to investigate whether what Tracy
 13 had told you was right, in the light of this interview?
 14 **A.** No, I didn't. I took it at face value and, as I said,
 15 it came in -- I forget the time on the email but it was
 16 all kind of back-to-back coming into this meeting.
 17 **Q.** It's at 4.59, I think, on the Monday and -- sorry, on
 18 the Wednesday, and this is on the Thursday.
 19 **A.** Yeah. So, as I said, this wasn't my meeting, it was
 20 Kevin's meeting. He had asked me to come in and support
 21 him, I thought more from an operational perspective,
 22 because I think Kevin did work in a branch at some point
 23 but he didn't have the relevant and up-to-date
 24 experience that I had, and I thought that's why I was
 25 there, and then the email from Tracy came in very late

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1 and I took that at face value. And I had no reason to
 2 doubt what Tracy was saying, I trust her in terms of
 3 her -- professionally, I haven't worked with her
 4 a number of years since, mostly after this, but I had no
 5 reason to doubt what she said or passed on, anyway.

6 **SIR WYN WILLIAMS:** That's what is going around in my head:
 7 at 4.59, if I've got what Mr Beer or you just said, you
 8 get information from her to the effect that, in certain
 9 circumstances, Fujitsu can access the branch accounts.
 10 You have no reason to doubt what she's told you.

11 **A.** Yes.

12 **SIR WYN WILLIAMS:** The following day, you're being
 13 challenged about whether the Post Office can do the
 14 same, in effect, and you're saying, unequivocally, no,
 15 they can't. But what you're not saying is -- even if
 16 it's only saying to yourself, as I understand you, "But,
 17 hang on a minute, Fujitsu can do this, so shouldn't I be
 18 looking at that?"

19 **A.** So what I didn't do in this meeting and I accept is
 20 I didn't volunteer that information but I have said --

21 **SIR WYN WILLIAMS:** Why is that?

22 **A.** So I think this, for me, I was -- I wasn't really --
 23 from my understanding, on solid ground, because I hadn't
 24 talked to anybody about it. I took it at face value.
 25 I didn't understand the technical aspects and,

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1 about a witness statement you made in November 2018, if
 2 we just scroll down. He says:
 3 "And you made this witness statement in November
 4 2018. This was something that you were aware of when
 5 you made this witness statement, isn't it --

6 **"Answer:** Yes.

7 **"Question:** -- the possibility of inserting
 8 transactions?

9 **"Answer:** The possibility but I've never actually
 10 seen this happen. The possibility of it yes.

11 **"Question:** How long have you known about that
 12 possibility [ie that's the possibility of inserting
 13 transactions]?

14 **"Answer:** This I something I have not -- because
 15 have not experienced it myself, I have not known of it
 16 that long, actually.

17 **"Question:** Could you give the court a rough idea of
 18 how long you have known it was possible?

19 **"Answer:** In terms of inserting transactions, last
 20 year or so.

21 **"Question:** Who told you about it?

22 **"Answer:** Fujitsu."

23 Yes?

24 **A.** Yes.

25 **Q.** So just go back to the bottom of that page. You're

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1 therefore, I was relaying. Kevin was the more senior
 2 person. He'd obviously been involved in those
 3 discussions with Tracy and I was basically answering
 4 some of the questions. Mark had said somebody in
 5 Fujitsu can and I basically accepted by saying, "But not
 6 without being seen to have done that, Mark", which is
 7 what Tracy had said.

8 **MR BEER:** Thank you. That can come down.
 9 Can I move forward a number of years to the evidence
 10 that you gave in the Horizon issues trial.
 11 I should say immediately that I'm going to leave the
 12 question of your role in the build-up to the trial and
 13 your role in the Group Litigation, generally, to others
 14 to ask questions about and, in every other respect, the
 15 evidence that you gave, to others to ask questions about
 16 and the findings that Mr Justice Fraser made to others
 17 to ask you questions about. This is the only thing I'm
 18 going to ask you about.

19 Can we look please at FUJ00163744. Can you see that
 20 this is 18 March 2019 in the High Court and this is
 21 a transcript of the evidence that you gave.

22 **A.** Yes.

23 **Q.** Yes? If we go forwards, please, to page 53. You're
 24 being asked questions here by Mr Patrick Green King's
 25 Counsel on behalf of the claimants. He's asking you

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1 telling the court that the first time you knew of the
 2 possibility of inserting transactions was in the last
 3 year?

4 **A.** Or so, yes.

5 **Q.** That was false, wasn't it?

6 **A.** Well, at the time I didn't think it was.

7 **Q.** No, that was false, wasn't it?

8 **A.** So -- if I can just explain. So what had been happening
 9 in Post Office was there was -- the message on remote
 10 access kept changing. So we would ask -- so there would
 11 be some information that said, you know, there were
 12 claims of this happening, and then we get push back that
 13 it didn't happen and, coming in to the GLO, we were
 14 still asking questions of Fujitsu and still getting
 15 changing messages.

16 So, for me, this was about the balancing
 17 transaction, which was the first formal recognition
 18 I knew of inserting a transaction, other than the Legacy
 19 system. But it was the balancing transaction that I've
 20 since learned had been used in March 2010. So when
 21 I answered the question, that's what I had in my head,
 22 which was -- and that was -- I couldn't remember the
 23 date and I still don't know the date, but it was leading
 24 into the trial that I became aware that that was
 25 actually something that had happened.

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1 Q. You've used the word "formally" and "actually" in the
2 answer that you have just given.
3 A. Yes.
4 Q. In what respect were the communications of December 2010
5 and January 2011, the latter of which you took at face
6 value, not formal or actual communications of the
7 position?
8 A. Because the position changed after that, from what
9 I understand, is that we were asking -- and I never
10 actually spoke to Fujitsu myself about this and I never
11 actually spoke to the IT guys directly, in terms of Andy
12 McLean. The position was changing and, therefore -- and
13 there was very strong messaging coming from within Post
14 Office that these things weren't possible, so it was
15 only really when I had the balancing transaction
16 information confirmed that that really registered with
17 me that that was the formal position and there was
18 evidence of that having taken place in March 2020 --
19 sorry, March 2010.
20 Q. You were suggesting here that you'd only come to know
21 about Fujitsu's ability to insert transactions in
22 mid-2018, or so --
23 A. So this --
24 Q. -- ie in the last year or so, weren't you?
25 A. So, yeah, that would have been about, as I say, going

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1 Q. Can you confirm that you had no contact with either
2 Mr Jenkins or Fujitsu in relation to the provision of
3 the witness statement that you gave in the High Court?
4 A. So I think from -- there was any two -- I think there
5 might be two but there was -- I'd spoke to Gareth about
6 the Lepton issues at the time that Helen Rose was
7 looking at that.
8 Q. So that was back when the events were happening --
9 A. Yes.
10 Q. -- not in preparation for the GLO; is that right?
11 A. That's right, yeah. Although the Helen Rose report was
12 part of the GLO, so I don't remember if I spoke to
13 Gareth again about that.
14 Q. Sorry, to be clear, you can't remember whether you spoke
15 to Mr Jenkins again --
16 A. Yeah --
17 Q. -- in preparation --
18 A. -- I don't think I did. I mean, I don't know Gareth
19 Jenkins, I've not met him. There was some email
20 correspondence, I definitely remember, and I think
21 I might have spoken to him maybe once, maybe twice but
22 I don't remember the detail. So there was the -- there
23 was the -- I did speak to -- had some correspondence
24 with him about the Lepton issue but I think that was
25 previously and I'm not sure if I spoke to him about the

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1 into -- my recollection is coming into the GLO prep, so
2 working that back, about 2017 would have been my
3 recollection but I couldn't put a date on it, and
4 I still can't put a date on the balancing transaction.
5 Q. So why didn't you say, "Well, hold on, I was told about
6 it in December 2010" --
7 A. Um --
8 Q. -- "or January 2011"?
9 A. Because I think at that -- as I say, at that point, the
10 imagining had been changing, and --
11 Q. I'm not that concerned about messaging. I'm more
12 interested in the facts.
13 A. That was my recollection at the time: that it was the
14 balancing transaction that -- for me, was that formal
15 recognition from Fujitsu that that could be done.
16 Q. Just by way of side issue at the moment, in
17 paragraph 223 of your witness statement, you say that
18 you recall discussions between the Post Office Legal
19 Team and possibly the Post Office IT Team, Fujitsu and
20 Gareth Jenkins in the course of the preparation for the
21 civil litigation but you were not involved in those
22 discussions and, therefore, you can't assist as to the
23 extent to which Fujitsu or Mr Jenkins provided
24 assistance in the Group Litigation; is that correct?
25 A. That's correct.

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1 Angela Burke information. I don't remember if I spoke
2 to him directly or not.
3 Q. Did you ever meet with Gareth Jenkins?
4 A. No, I've never met Gareth Jenkins.
5 Q. You say that in your evidence under cross-examination in
6 the Horizon Issues trial. Just for the note,
7 FUJ00163744 at page 25.
8 In paragraph 214 of your witness statement, if we
9 turn that up, please, which is on page 101, please,
10 paragraph 214, you're dealing with your Common Issues
11 witness statement here and you say in the second line:
12 "For the most part this was derived from my own
13 knowledge ..."
14 A. Yes.
15 Q. "... some of which will have been drawn documents that
16 [you] had read over the years."
17 So that wasn't derived from any conversations you
18 had with Mr Jenkins at that time?
19 A. Sorry, what -- sorry, I missed --
20 Q. The contents of your Common Issues statement?
21 A. So most of my Common Issues statement was more broadly
22 about Post Office and how it operated.
23 Q. Yes. Then what about the Horizon Issues witness
24 statement? Any of that derived from communications
25 with --

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1 A. I don't believe so.
 2 Q. -- or conversations with Mr Jenkins?
 3 A. I don't think I had a conversation -- I can't remember,
 4 but I don't believe I spoke to Gareth so --
 5 Q. Thank you. That can come down.
 6 For the Group Litigation, were you asked to
 7 participate in any disclosure exercise?
 8 A. No. Not that I remember.
 9 Q. So you weren't asked to look at your emails to turn up,
 10 for example, the email of 5 December or the email of
 11 5 January?
 12 A. No. So I think the disclosure exercise was done within
 13 the business and everything was pulled that way.
 14 I don't remember being asked to go back and look at
 15 anything or to search on my particular laptop for
 16 anything.
 17 Q. Did you yourself go back and look at your emails or
 18 other document repositories, so that you could consider
 19 your state of knowledge on the issues relevant to the
 20 Horizon Issues trial for the purposes of preparing
 21 either your witness statement or your oral evidence?
 22 A. No.
 23 Q. So you didn't think, "I'm going to be asked about
 24 Horizon integrity, I should look at my email account to
 25 see what I have received over time about Horizon

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1 Q. Did you conduct any exercise of self-reflection on what
 2 you knew about the live issues in the Horizon Issues
 3 Trial? Search your own diaries, search your own email
 4 inbox and sent items? Look through any notes that you
 5 may have made?
 6 A. For the Horizon trial?
 7 Q. Yes.
 8 A. So the -- most content for the Horizon trial is --
 9 I pulled from the investigations that my team had done
 10 in the cases. I didn't do any -- again, didn't do any
 11 searches on my laptop and, in terms of my diary, not
 12 that I can recall.
 13 Q. Why not?
 14 A. I don't know because I didn't think it was relevant in
 15 terms of what I was -- information I was giving. I just
 16 didn't give it a thought and nobody suggested at all to
 17 me that that was something I should be doing.
 18 Q. When giving evidence today in preparation, you seem to
 19 have researched whether 5 December was a Sunday or not?
 20 A. Yes.
 21 Q. Why didn't you give that care and attention to the
 22 previous occasions when you gave evidence?
 23 A. Because I think the difference with this Inquiry
 24 approach is I had a list of documents to review, I had
 25 a list of questions to consider and I did research that

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1 integrity, so I can give straightforward and open
 2 evidence"?)
 3 A. No, I never searched back. I don't remember the
 4 December emails and I wouldn't have even known where to
 5 look for that because I don't even remember receiving
 6 them, and the Ferndown interview really was -- for me,
 7 it was less about the Horizon integrity and the remote
 8 access; it was more about that -- supporting Kevin in
 9 that meeting and it was about the relationship reset.
 10 So I didn't -- going into the two trials, I didn't
 11 search through my emails regarding that and I would have
 12 forgotten about those emails anyway; as I say, I don't
 13 even remember having the one from John.
 14 Q. Isn't that the reason that, if you're giving evidence in
 15 an important case to the High Court on oath, you might
 16 conduct an exercise in self-reflection and say, "I'm
 17 going to check my emails and see what I knew when"?
 18 A. I wish I had but I didn't.
 19 Q. So you maintain that the emails that we've looked at of
 20 December 2010 and 5 January 2011 were not either shown
 21 to you by solicitors preparing your witness statement,
 22 or found by you as part of an evidence readying session?
 23 A. Yes, I don't remember. I mean, it was only coming into
 24 this exercise that I remembered the Ferndown -- having
 25 been involved in it at all.

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1 really well, as far as I could. That was a very
 2 different approach to when I gave evidence in the two
 3 trials, and I think, looking back and coming into this,
 4 I've come into this with -- knowing what more to expect,
 5 and I've made sure that, you know, I've familiarised
 6 myself with everything I've been provided with and
 7 requested more information when I think there was more.
 8 I didn't have that same approach going into the two
 9 trials.
 10 Q. Can we go back, then, in time, still looking at remote
 11 access, and look at POL00115919. This is a briefing
 12 note, as we can see, prepared for Paula Vennells in
 13 relation to the Second Sight review into Horizon and, in
 14 particular, the implications of their interim report.
 15 It's draft and it's dated 2 July 2013. If we look at
 16 the foot of page 2 for some context, please.
 17 I should say that this is all part of the background
 18 being briefed to Ms Vennells. At paragraph 7, it
 19 records that:
 20 "Susan Crichton, Lesley Sewell, Alwen Lyons, [you]
 21 and Simon Baker met [Second Sight] on 1 July at 3.00 pm
 22 to obtain a clearer pure of [Second Sight's] interim
 23 findings and timing for delivery."
 24 So you've seen Second Sight the day before this
 25 document --

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1 A. Okay.

2 Q. -- to work out what they're going to say, essentially,
3 in their interim findings, agreed?

4 A. I don't remember but yes, it's there.

5 Q. If we go forwards, please, to page 4, under the heading
6 "The 2 Anomalies", the document says:
7 "We also understand [Second Sight's] Interim Report
8 will discuss two anomalies in Horizon's operation.
9 "These were found by Post Office Limited and
10 voluntarily communicated to [Second Sight], ie neither
11 was identified by [Second Sight] as part of its review."
12 The first is badged up as the "62 Branch Anomaly".
13 This is the receipts and payments mismatch bug, if you
14 remember, the thing that was discussed at that meeting
15 in the autumn of 2010, at which it had become apparent
16 to six Post Office people, including Messrs Marwood,
17 Trundell and Winn, that remote access was possible and
18 allowed Fujitsu to tamper with branch accounts without
19 a subpostmaster's knowledge.
20 Then a summary is set out. If we just read the
21 first part, (a), it affects 62 branches; concerns the
22 receipts and payments mismatch in Horizon Online, when
23 discrepancies were moved into the local suspense
24 account; appeared first in March 2010; majority of
25 incidents occurred between August and October 2010; the

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1 Q. Do you know why it doesn't reference what you knew was
2 a result of the December 2010 email and the January 2011
3 email?

4 A. As I said, I don't remember the December 2010 anyway,
5 but no, I just don't remember this at all. Simon was
6 pulling this together, if I remember correctly. Simon
7 was part of the IT and Change space and Simon would have
8 been best placed to have that information but, sorry,
9 I can't answer anything further than that.

10 Q. Can we move on, then, to 2014, please, and look at
11 POL00304439, and start by looking, please, at page 3.
12 There's an email in 2014, 10 April 2014, from you to
13 Andrew Winn and Alan Lusher so, by this time, I think
14 you were Head of Partnerships; is that right?

15 A. Yes.

16 Q. Yes, we can see that on the footer. The Mediation
17 Scheme is up and running now, yes --

18 A. Yes.

19 Q. -- Second Sight has produced its report? You say to
20 Alan and Andy:
21 "As part of a Mediation Scheme case submission the
22 Applicant is referring to an email a copy of which I'm
23 trying to track down. You have been mentioned in
24 respect of this email:
25 "... with the Andy Winn/Alan Lusher email in the

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1 losses ranged from those two amounts; identified by
2 Horizon's built in checks and balances; could have been
3 identified if the subpostmaster had carefully
4 scrutinised their final balance report; 17 branches were
5 adversely affected; subpostmasters notified in March
6 2011 and, where appropriate, reimbursed; subpostmasters
7 who made a gain through the anomaly were not asked to
8 refund this; pre-date separation would have been dealt
9 with by Royal Mail Legal.
10 Then it sets out the reason for delaying
11 notification to subpostmasters.
12 Then it continues on the "14 Branch Anomaly", which
13 is something else, yes?

14 A. Yes.

15 Q. Who was responsible for this summary of the 62 branch
16 anomaly?

17 A. I think it was Simon Baker that pulled that together.

18 Q. Did you contribute towards this?

19 A. No.

20 Q. Did you read it before it was submitted to Ms Vennells?

21 A. I don't recall, I don't remember seeing that before but
22 I can't be sure.

23 Q. Do you know why it doesn't pick up, in this context, the
24 remote access issue?

25 A. No.

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1 case of Ward which explicitly states that Fujitsu can
2 remotely change the figures in the branches without the
3 [subpostmaster's] knowledge or authority ...".

4 You ask them, as a matter of urgency, to send you
5 a copy of that email, associated emails and any other
6 associated information. So you're asking them for
7 a copy of the Winn/Lusher email, essentially, yes?

8 A. Yes, that's right.

9 Q. Can we look, please, at the Winn/Lusher email.
10 POL00117650, foot of the page, please. Scroll down
11 a bit, please. Thank you. Mr Lusher to Mr Winn.
12 "I spoke to you a few days ago about a suspension at
13 Rivenhall."
14 Over the page:
15 "[Got] a good understanding of the problem ..."
16 Skip the next paragraph. Mr Ward, the
17 subpostmaster, raised:
18 "1. ... that on a number of occasions figures have
19 appeared in the cheques line of his account. He
20 suspects these have been input into his account
21 electronically without his knowledge or consent. He is
22 certain that he has cleared and remmed out cheques in
23 the correct way and tells me that cheques must be
24 properly cleared on the system to progress to a new
25 account.

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1 "2. He has made good about £10,000 and not made
2 good about £11,000 of the shortages ... He claims that
3 because of the abnormal nature of these entries, the
4 shortages have just not rolled over from one branch
5 trading statement to [another].

6 "The subpostmaster's contract remains suspended."

7 Then the reply on page 1, please:

8 "The only way that [the Post Office] can impact
9 branch accounts remotely is via the transaction
10 correction process. These have to be accepted by the
11 branch in the same way that in/out remittances are
12 I guess. If we were able to do this, the integrity of
13 the system would be flawed. Fujitsu have the ability to
14 impact branch records via the message store but have
15 extremely rigorous procedures in place to prevent
16 adjustments being made without prior authorisation --
17 within [the Post Office] and Fujitsu.

18 "These controls form the core of our court defence
19 if we get to that stage. He [the subpostmaster] makes
20 a casual accusation that is extremely serious to the
21 business. As usual he should either produce the
22 evidence for this or withdraw the accusation."

23 You see that?

24 **A.** Yes.

25 **Q.** So that's the email you're after, yes?

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1 2010, the January 2011 and now an April 2014 series of
2 emails that are telling you about that facility, agreed?

3 **A.** As I've said, the balancing transaction was the first
4 formal notification that I recall of being made aware
5 of. Before that, there were a number of -- and you're
6 quite right -- the emails but I have -- and the Andy
7 Winn I did something, I can't remember exactly what, in
8 terms of getting under the skin of that because there
9 did seem to be a number of almost throwaway lines on
10 Horizon integrity, or things like that, that just
11 weren't being evidenced, and it was the balancing
12 transaction for me, that was the first time it was proof
13 that it did exist and it had actually been used.

14 So I'm not sure exactly. I mean, when I gave my
15 evidence to the trials, it was on the basis of what
16 I understood to be true at the time. There will be,
17 like December 2010, as I say, I didn't remember, and
18 there are things I will have forgotten about but there
19 are things that have moved on from some of the
20 information that's been shown, I just can't remember
21 exactly thought the outcome of that was.

22 **MR BEER:** Sir, might we take our second morning break there,
23 please?

24 **SIR WYN WILLIAMS:** Yes.

25 **MR BEER:** Can I just check the time precisely. Can we

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1 **A.** Correct.

2 **Q.** Can we go, please, back to POL00304439. If we scroll
3 down to page 2, please, bottom of the page:

4 "Angela

5 "Please find attached an email which may be the one
6 referred to?"

7 I believe it is the one we just referred to:

8 "I have records of a significant number of documents
9 [et cetera]. Would you like me to send everything to
10 you?"

11 Top of the page:

12 "Thanks for sending this email through -- very
13 helpful."

14 So in 2014, you were being told, as well, that
15 remote access by Fujitsu was possible?

16 **A.** From Andy Winn's note, yes.

17 **Q.** Did you reveal that to the High Court when you gave
18 evidence?

19 **A.** I don't believe I did, on the --

20 **Q.** Did you forget about this email too?

21 **A.** So I think I've raised that internally to get to the
22 bottom of it but I can't recall. But --

23 **Q.** You told the High Court that you only learned about the
24 facility to insert transactions about a year before
25 giving evidence. So far, we've looked at the December

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1 reconvene at 12.25 past, please.

2 **SIR WYN WILLIAMS:** Yes. Certainly, and will you give some
3 thought to then going on until, say, about 1.15 because,
4 if we only have one break in the afternoon, it's
5 probably better if we have a slightly later lunch.

6 **MR BEER:** Thank you sir, yes.

7 **SIR WYN WILLIAMS:** Fine.

8 (12.14 pm)

(A short break)

9 (12.25 pm)

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

11 **SIR WYN WILLIAMS:** Yes, I can.

12 **MR BEER:** Thank you.

13 Ms van den Bogerd, we were looking at the email
14 exchange of 10 April 2014 where you were tracking down
15 a keep of the Winn/Lusher email exchange.

16 **A.** Yes.

17 **Q.** Can we look, please, at POL00304478. If we look at the
18 first page, we can see we're now on 9 May and there is
19 a whole chain sent to you by Andrew Parsons, yes?

20 **A.** Yes.

21 **Q.** If we can look at the chain, please, to see what it
22 contained and start on page 6, please. If we scroll to
23 the bottom, please, we'll see an email from Rodric
24 Williams of 14 April to James Davidson of Fujitsu, yes?

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1 **A.** Yes.
 2 **Q.** "James,
 3 "Could Fujitsu please answer the questions below so
 4 that we can respond to a specific challenge put to us by
 5 Second Sight in connection with a Mediation ...
 6 complaint ...
 7 "the [Winn/Lusher] email in the case of Ward ...
 8 explicitly states that Fujitsu can remotely change the
 9 figures in the branches without the subpostmasters
 10 knowledge or authority'."
 11 He attaches the Winn/Lusher email:
 12 "The part of the email in question is:
 13 "Fujitsu have the ability to impact branch records
 14 via the message store but have extremely rigorous
 15 procedures in place to prevent adjustments being made
 16 without prior authorisation -- within [the Post Office]
 17 and Fujitsu these controls form the core of our defence
 18 if we get to that stage'."
 19 Then Mr Winn sets out a series of questions:
 20 "Can Post Office change branch transaction data
 21 without a subpostmaster being aware of the change?
 22 "Can Fujitsu change branch transaction data without
 23 a subpostmaster being aware of the change?
 24 "If not, where is the evidence for this conclusion?
 25 "If so:

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1 a subpostmaster being aware of the change? [Answer]
 2 Once created, branch transaction data cannot be changed
 3 ..."
 4 Then this:
 5 "... only additional data can be inserted. If this
 6 is required, the additional transactions will be visible
 7 on the trading statements but would not require
 8 acknowledgement/approval by a subpostmaster, the
 9 approval is given by Post Office via the change process.
 10 In response to a previous query Fujitsu checked last
 11 year when this was done on Horizon Online and we found
 12 any one occurrence in March 2010 which was early in the
 13 pilot for Horizon Online and was covered by
 14 an appropriate change request ... For Old Horizon,
 15 a detailed examination of archived data would have to be
 16 undertaken to look into this across the lifetime of use.
 17 This would be a significant and complex exercise to
 18 undertake and discussed previously with Post Office but
 19 this counted as too costly and impractical."
 20 Then he gives a series of answers that I'm not going
 21 to read out to Mr Williams' questions at 4(a) to (e) and
 22 then 5(a) to (f).
 23 Then, before we move on from that, you would agree
 24 this is Fujitsu saying that Fujitsu can insert branch
 25 transaction data?

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1 "How does this happen?
 2 "Why was this functionality built [in]?
 3 "Why would Fujitsu need to use this functionality?
 4 "When has branch data been accessed in this way ...
 5 "In relation to the Winn/Lusher email:
 6 "What is 'message store'?
 7 "Can this be used to access and change branch
 8 [accounts]?
 9 "What is the 'impact' of this change on branch
 10 [accounts]?
 11 "Would the subpostmaster be aware of this change?
 12 "Why would this method of access be used?
 13 "What controls are in place to prevent misuse of
 14 this method of access?"
 15 All penetrating questions, do you agree?
 16 **A.** Yes.
 17 **Q.** They necessarily arise from the two lines in the
 18 Winn/Lusher email that we've seen?
 19 **A.** Yes.
 20 **Q.** They're logical questions that arise from it. Can we
 21 go, please, to page 4. Halfway down the page,
 22 Mr Davidson of Fujitsu replies to Mr Williams:
 23 "Please see [the] response below."
 24 Then if we go to 2:
 25 "Can Fujitsu change branch transaction data without

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1 **A.** Yes.
 2 **Q.** This is Fujitsu saying that they, Fujitsu, could do so
 3 without approval by a subpostmaster?
 4 **A.** Yes, they're referring to the balancing transaction,
 5 although they've not specifically said that here.
 6 **Q.** You think this is all about balancing transactions,
 7 essentially?
 8 **A.** I think so, yes.
 9 **Q.** Can we go to page 2, please, foot of the page.
 10 Mr Williams says he's producing a first draft of the
 11 note, noting that he has intentionally not referred to
 12 the Winn/Lusher email, as it distracts from what is
 13 otherwise a very clear picture. He hopes this will put
 14 the matter to bed and the matter need not be escalated
 15 to the Working Group, yes?
 16 **A.** Yeah.
 17 **Q.** Then page 1, please, that whole chain is provided to
 18 you, and the interim or the proposed interim answer to
 19 Second Sight's question as to whether it is possible for
 20 anyone to access Horizon Online and amend transaction
 21 data without the knowledge of the subpostmaster or their
 22 staff, second line:
 23 "There's no functionality in the Horizon system,
 24 (through either a front-end terminal or back-end server)
 25 to edit or delete transaction data once it has been

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1 transmitted from a branch to the central branch data
 2 centre. [This] is encrypted, transferred to the branch
 3 data centre and stored in a separate audit server where
 4 they are sealed using industry standard secure protocols
 5 to ensure the data's integrity. Although it is possible
 6 to input additional transactions into a branch's
 7 accounts ... a subpostmaster will always that have
 8 visibility of these extra transactions as they are shown
 9 separately in the branch's accounts. A more detailed
 10 note will follow ..."

11 Did you approve this holding response and pass it to
 12 Second Sight?

13 A. I didn't approve it.

14 Q. Why was it being sent to you?

15 A. To pass on.

16 Q. I'm sorry?

17 A. To pass on, I think.

18 Q. To Second Sight?

19 A. I think so because I tended to be passing things on to
 20 Second Sight at the time, rather --

21 Q. Keep your voice up please?

22 A. Sorry, I tended to be passing things on to Second Sight
 23 at the time for that information. But, just going back
 24 to what you've -- what this doesn't say, it doesn't
 25 mention balancing transaction and, looking at this now,

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1 know, what we've just gone through, even though --
 2 sorry, James Davidson -- I think it was, wasn't it --
 3 didn't actually mention balancing transaction by name.
 4 That is what it took from reading this but, at the time
 5 I wouldn't have known about a balancing transaction,
 6 it's just that I know about that subsequently and we
 7 should have -- it should have been put into this.

8 And I think I've just forwarded this on to Second
 9 Sight as that's our position at the moment, expecting
 10 something else to follow but I don't know what.

11 Q. Do you agree the answer that has been drafted by
 12 Mr Parsons, by comparison to the information provided by
 13 Fujitsu is materially incomplete?

14 A. Yes.

15 Q. Can we move on, please, to POL00091394. Can we start
 16 with page 2, please.

17 We're in October 2014 now. If we just look at the
 18 foot of page 1 to get the context, an email from Jessica
 19 Barker to a wide range of people, including you. It's
 20 about one of their cases that has been referred to
 21 mediation, yes --

22 A. Yes.

23 Q. -- MO53:

24 "Second Sight have released a revised version of
 25 their draft CRR for MO53."

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1 this should have mentioned balancing transaction.

2 Q. You're ahead of me of the things that it fails to
 3 mention.

4 A. Sorry.

5 Q. It fails to set out that Fujitsu had confirmed that
 6 Fujitsu could insert additional transaction data outside
 7 of transaction corrections, doesn't it?

8 A. Yes, it does.

9 Q. And that that didn't require the approval or
 10 acknowledgement of the subpostmaster; it doesn't say
 11 that either, does it?

12 A. No, it doesn't.

13 Q. It failed to inform Second Sight that the Post Office
 14 could not address the extent of any use of remote access
 15 in Legacy Horizon, something that had been used for
 16 10 years, because a detailed examination of archived
 17 data was needed, and that would be costly and
 18 impractical. It doesn't say that, does it?

19 A. No, it doesn't.

20 Q. Can you explain why the Post Office chose not to include
 21 those three pieces of information?

22 A. I don't know. I mean, it says a more detailed not will
 23 follow but it won't be ready before the fact file. But
 24 on the basis -- I don't know what further work Andy
 25 expected to be done on this because -- just reading, you

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1 Can you remember what CRRs were?

2 A. Case review reports, and that's Second Sight's
 3 investigation into the scheme applications.

4 Q. So it's essentially a draft of what Second Sight propose
 5 to say about an individual case; is that right?

6 A. That's correct.

7 Q. Just read the rest of that to yourself because it's not
 8 completely material. If we go back to page 1, please,
 9 middle of the page, Belinda Crowe, what role was she
 10 performing in late 2014?

11 A. So Belinda was the Programme Director for Project
 12 Sparrow. She also was the Secretariat for the Working
 13 Group, the scheme Working Group.

14 Q. She asked the question:

15 "Is this the first [ie the first CRR] which
 16 references remote access? I think we need to pick this
 17 up very robustly in our response as this could become
 18 public and Second Sight seem to be asking for proof that
 19 something didn't happen.

20 "Could we dust off our lines on this?"

21 Then if we scroll up the page, please. Melanie
 22 Corfield, late 2014, what role was she performing?

23 A. She was part of the Comms Team.

24 Q. So a media and communications expert --

25 A. Yes.

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1 Q. -- or professional?
 2 A. Yes.
 3 Q. She replies to the same group, including you:
 4 "Our current line if we are asked about remote
 5 access ... being used to change branch data/transactions
 6 is simply: 'This is not at never has been possible'.
 7 You knew that was false from multiple sources by
 8 now, didn't you?
 9 A. Yes, because we -- well, what we've just seen was
 10 injecting transactions in, branch -- balancing
 11 transaction.
 12 Q. We've got the 2010 email that you don't recall, we've
 13 got the January 2011, we've got the earlier exchanges in
 14 April and May 2014. That first statement, "This is not
 15 and has never been possible", is false.
 16 A. Well, she's talking about change in branch data. Yeah,
 17 I think it's a stretch. I mean, I'm talking about
 18 inserting a transaction, I'm not sure what -- I mean,
 19 that's what it says, change branch data and
 20 transactions.
 21 Q. You wouldn't want a Post Office line to dance on the
 22 head of a pin, would you?
 23 A. No, I wouldn't.
 24 Q. Which I think is what you were doing a moment ago,
 25 weren't you?

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1 Q. Ms Corfield continues:
 2 "We might get pushed further on it and be asked by
 3 media to confirm whether or not there is any remote
 4 access. We will need to make the distinction re access
 5 as straightforward as we can so suggest: 'There is no
 6 remote access for individual branch transactions.
 7 Fujitsu has support access to the "back end" of the
 8 system used for software updates and maintenance. This
 9 is of course is strictly controlled with security
 10 processes in place but could not, in any event, be used
 11 for individual branch transactions -- there is no
 12 facility at all within the system for this'.
 13 You knew that was false as well, didn't you?
 14 A. It didn't register with me at the time but, obviously,
 15 from what we've discussed, then this was incorrect in
 16 terms of a flow of information, yes.
 17 Q. So the three lines, which seemed to be a "main line" in
 18 paragraph 1, an "if pressed" line in paragraph 2 and
 19 then "if really pushed" in paragraph 3, all three of
 20 them contain statements which you knew to be false,
 21 didn't they?
 22 A. Although I didn't recognise it at the time, yes.
 23 Q. Did you do anything to correct these three false lines
 24 to take?
 25 A. I don't remember. I note that we've got Rod and Andy

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1 A. I'm just trying --
 2 Q. Contemplating the possibility that, because this doesn't
 3 refer to injecting new data --
 4 A. I suppose I'm just trying to rationalise why, you know,
 5 that's been said when what we've just come out of is the
 6 balancing transaction information.
 7 Q. It continues:
 8 "This line holds but if we are pressed regarding
 9 [Second Sight's] point about 'admitting' there is remote
 10 access we can say 'There is no remote access for
 11 individual branch transactions'.
 12 You knew that was false, as well, from multiple
 13 sources, didn't you?
 14 A. Sorry, do you mind -- so the James Davidson email, what
 15 date was on that?
 16 Q. Davidson email was 9 May.
 17 A. 2014?
 18 Q. Yes.
 19 A. Sorry, your original question was I knew this was false
 20 on the back --
 21 Q. Yes, that line that there is no remote access for
 22 individual branch transactions?
 23 A. On the back of the email from James Davidson, then
 24 clearly I was aware of that and I just didn't pick this
 25 up.

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1 Parsons on here, as well. So I don't remember if
 2 anything else came out of this.
 3 Q. Mr Parsons' time will come in due course. I'm asking
 4 you at the moment.
 5 A. Sorry, my answer was I don't remember.
 6 Q. Well, can you help us? We've seen a slew of emails now
 7 that informed you, in one way or another, of the
 8 facility of Fujitsu remotely to access individual
 9 transactions in branch accounts and change them by
 10 inserting data. Why wouldn't you put your hand up and
 11 say, "Hold on, this is all wrong, what we're proposing
 12 to say".
 13 A. I just can't recall. To me, I just -- it couldn't have
 14 registered with me in terms of the flow of information
 15 that had gone before. As I said, the messaging was
 16 constantly changing but, on the back of the James
 17 Davidson email, I think that -- you know, which had come
 18 from Fujitsu, other information had come from within the
 19 business or from different sources, but that had come
 20 from Fujitsu and, therefore, that, for me, should have
 21 been registering as that and, notwithstanding, you know,
 22 the note that Andy put together, but it should have been
 23 registering that that is what Fujitsu were saying could
 24 happen, which is the balancing transaction.
 25 Q. If we scroll down a little bit -- thank you -- Belinda

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1 Crowe says:
 2 "I think we need to pick this up [that's the
 3 suggestion of remote access] very robustly in our
 4 response as this could become public ..."
 5 Is that the reason why you didn't pick any of this
 6 up and say, "Hold on, there are three false
 7 statements -- the only statements we're proposing to
 8 make are each false"?

9 **A.** No.
 10 **Q.** Because the business wanted to respond robustly?
 11 **A.** I wouldn't have -- it just didn't -- if it had
 12 registered with me, I would have challenged it because,
 13 you know, we had one of the applicants to the scheme,
 14 which is what's triggered all of this anyway, that was
 15 already in the public domain, because we were not openly
 16 in the public domain but we were already dealing with
 17 that. So if that's what our position should have been,
 18 then we should have been saying that, and I must --
 19 I just must have missed it.
 20 **Q.** It's you and quite a lot of other people, isn't it?
 21 **A.** In terms of who else had missed it, is that what you're
 22 saying?
 23 **Q.** Mm.
 24 **A.** Yeah, and I just --
 25 **Q.** Well, is it a case of everyone missing it or is it that

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1 **Q.** The document itself isn't dated but it was sent, we can
 2 tell from other evidence, to you from Mel Corfield by
 3 email on 18 June 2015.
 4 **A.** Okay.
 5 **Q.** Okay? If we just familiarise ourselves with it because
 6 I don't think we've seen this before:
 7 "Background -- Film for use through internal
 8 channels throughout the business to deliver key messages
 9 and facts about allegations likely to be made in the BBC
 10 Panorama programme. It will be alongside and
 11 supplemented by the full internal communications plan
 12 currently in development.
 13 "Although an internal film, it will of course be 'in
 14 public' so available to external audiences.
 15 "It will be 3-5 minutes of hardhitting question and
 16 answer session between you and Kim Fletcher from
 17 Brunswick."
 18 Is Brunswick a media and public relations
 19 consultancy?
 20 **A.** Yes.
 21 **Q.** So this was going to be a Q&A where Brunswick, the media
 22 and comms people, put questions, hardhitting questions,
 23 to you --
 24 **A.** Yes.
 25 **Q.** -- and you answered them. This was intended for

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1 the overriding objective is to defend very robustly the
 2 position that there is no remote access?
 3 **A.** That was never my position. I mean, if -- I came into
 4 the scheme originally, at the start, to get under the
 5 skin of was there any substance in the claims and I took
 6 that role on voluntarily, on top of the day job I was
 7 doing at the time, because I really wanted to
 8 understand. There is no way that, if I'd thought there
 9 was something in that, that I would have -- I was
 10 certainly not trying to cover up or suppress or do
 11 anything along those lines and that's the bit I'm
 12 struggling with because it wasn't just me; there are
 13 other people being party to the same information at that
 14 point.
 15 **Q.** Thank you. That can come down. Can we must have
 16 forward to the next year then, 2015, still dealing with
 17 remote access, and look at POL00089010.
 18 This is, as you can see at the top, a briefing for
 19 you, in relation to an internal film re Panorama. It
 20 relates, to give you some context, to the BBC Panorama
 21 episode that was called "Trouble at the Post Office"; do
 22 you remember that?
 23 **A.** Yes, I do.
 24 **Q.** That was eventually aired on 17 August 2015.
 25 **A.** Yes.

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1 internal consumption principally; is that right?
 2 **A.** That was the intention, yes.
 3 **Q.** "Whilst we will focus on some key rebuttals regarding
 4 the content of Panorama, this messaging should likely
 5 address concerns or questions from a Network perspective
 6 so people feel confident re the Post Office position,
 7 reassured regarding the system and, importantly, they
 8 are being kept well informed ... will include some
 9 'signposting' to other communication materials. We
 10 appreciate your guidance about the messaging for the
 11 Network on this subject.
 12 "Panorama: you'll have seen the latest email sent on
 13 Friday.
 14 "Theme appears to be an allegation of potential
 15 miscarriages of justice thorough inappropriate conduct
 16 by Post Office, especially regarding alleged 'pressure'
 17 on postmasters to plead guilty to false accounting.
 18 "Focusing on three criminal cases (Jo Hamilton, Noel
 19 Thomas and Seema Misra), aspects of which they are
 20 likely to attempt to 'illustrate' wider allegations and
 21 which will, of course, supply significant 'human
 22 interest'. The key aspect of this will likely be
 23 allegations to try to create the perception that people
 24 were prosecuted for 'getting in a muddle' and for the
 25 recovery of money.

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1 "They are likely to refer heavily to Second Sight's
2 reports throughout (as 'evidence').
3 "They are likely to have contributors who will
4 continue to 'cast doubts' about Horizon through
5 'technical opinions'/supposed 'revelations' about
6 aspects of the system highly likely to include at least
7 one 'stunt' in the programme and could well be on the
8 subject of alleged remote access but indications are
9 there will also be selectively 'leaked' material that
10 will be used out of context.
11 "They are likely to include allegations that the
12 Post Office has not run the Mediation Scheme fairly and
13 has hampered it to avoid [the risk of] compensation."
14 I'm not going to read the rest of that page. Can we
15 go to page 3, please. The "Key messages", would you
16 understand these are the key messages for you to get
17 out?
18 **A.** As this is written, yes.
19 **Q.** Number 1:
20 "This is about missing money, which we have a duty
21 to protect.
22 "Trust is vital.
23 "We have a duty to protect the money in our
24 branches. If cash goes missing and this is covered up
25 we must investigate and act on this.
109

1 control the legal process, it's defence lawyers and the
2 courts.
3 **A.** Yes.
4 **Q.** Did you understand in mid-2015 they were the key
5 messages that the Post Office wished to get out?
6 **A.** I hadn't seen it all put together in one place but,
7 given that this was put together as a briefing document
8 for me, then yes.
9 **Q.** The third key message is:
10 "There is nothing wrong with the computer system."
11 So before I ask you about that, if we just scroll
12 up, please: this is all about missing money that we've
13 got a duty to protect. We heard evidence earlier this
14 week from Susan Crichton, the General Counsel of the
15 Post Office, and she told the Chairman that you were
16 amongst a group of people who had been in the Post
17 Office for a very long time, who held the view that this
18 was public money that was being stolen, it needed to be
19 protected and it needed to be recovered through
20 prosecutions; is that correct?
21 **A.** In terms of taxpayers' money, I was always made aware
22 that this is taxpayers' money, when I came into the Post
23 Office, so that was a consideration and, therefore, we
24 had a duty to protect it and make sure that we had the
25 right checks in place. Recovery through prosecution,
111

1 "We don't prosecute people for making mistakes --
2 many never have and we never will. Prosecutions are
3 very rare and only ever in the light of all the
4 available evidence and circumstances."
5 Then the second message:
6 "We do not control the legal process.
7 "If we do prosecute, this is done with numerous
8 checks and balances -- ultimately scrutinised by defence
9 lawyers and the courts themselves.
10 "We do not bring charges or prosecute without
11 evidence and we do not pressure anyone regarding their
12 plea to a charge. The decision to plead guilty or not
13 guilty is always one for the defendant only, having
14 taken advice ...
15 "Criminal cases are kept under continual review --
16 that is our absolute duty. In none of our
17 investigations, nor through that of the independent
18 accountants, has any evidence emerged to suggest that
19 a conviction is unsafe."
20 I'm going to come back to that this afternoon.
21 "Such matters cannot be assessed in the media on
22 partial -- and often inaccurate -- information and nor
23 should it be in any circumstances."
24 Those two messages: is all about missing money
25 stolen by subpostmasters; and we, the post office, don't
110

1 that wouldn't have been on my radar at all. So it was
2 really about, from an operational perspective, just
3 having the consideration and it was always the
4 consideration, actually, that this is taxpayers' money,
5 and not just in the context of subpostmasters but as
6 a business as a whole.
7 **Q.** Ms Crichton held the view or seemed to hold the view
8 that there were a group of people that were particularly
9 long serving, which group included you, that emphasised
10 this point, rather than it just being a fact or matter
11 as you've described it today that is part of the
12 background. Is it something that you emphasised, that
13 this is public money that we've got a duty to protect?
14 **A.** No. I don't ever remember doing that. As I said, I had
15 been in the business a long time, I'd worked -- I'd
16 started working in branch and it was always part of the
17 consideration that we are a -- not a -- well, we were --
18 the shareholder was Government but we were in that kind
19 of quasi-state where we were required to make a profit
20 as well. But it was -- we should have consideration for
21 the taxpayers' money but not against -- you know, as if
22 it was a real emphasis against anything else. It wasn't
23 the be-all and end-all, is what I'm trying to say. It
24 was a consideration and I don't ever remember
25 emphasising that to Susan or anybody else.
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1 I mean, Kevin was Network, he'd been in the
2 business, I think, longer than me actually, and there
3 would be other people in the network that would have
4 been in as long as me or even longer. But I don't
5 remember ever it being emphasised, but it was
6 a consideration.

7 **Q.** There wasn't a cabal of long-serving, up through the
8 ranks, started off as counter clerks or similar, who
9 a held the belief this was just "subbies" with their
10 hands in the till?

11 **A.** Not at all. Not at all. I mean, my position, I'd
12 worked very closely with postmasters for a number of
13 years and, you know, I said on a number of occasions
14 into the organisation, where people did think
15 postmasters had their hand in the till, is that, in my
16 view, postmasters were hardworking, honest, decent
17 people and they didn't come into the Post Office to
18 defraud. That wasn't why they came into the Post
19 Office. It was quite the opposite: they came in to
20 serve the communities that they lived within.

21 **Q.** Can we go back to the third key message at the foot of
22 the page.

23 "There is nothing wrong with the computer system.

24 "We have never said Horizon is perfect or
25 infallible. It's a computer system so of course things

113

1 remember what we did as a result of this because I did
2 try and get some further disclosure to say did we
3 film -- because I don't remember. Certainly, film
4 didn't go out but, in having a brief prepared for me,
5 I would have then, if I was going to use this, I would
6 have fine-tuned it to (1) how I speak and, if there was
7 any corrections in the facts, then I would have
8 corrected it.

9 **Q.** Can we go forward to page 7, please. And scroll down to
10 that main heading, "Second Sight's evidence". This is
11 part of the briefing which addresses the main
12 allegations that Ms Corfield believed would be made by
13 Panorama and the suggested replies:

14 "Second Sight's evidence that remote access to
15 branch data is possible in spite of Post Office
16 denials."

17 Reply:

18 "This is about facts, not theories. There's been
19 a lot of inaccurate things said in the media about
20 'remote access' but there's not a single example in
21 these cases of Horizon causing losses, whether through
22 remote tampering or anything else.

23 "The most important points sometimes get lost in the
24 technical explanations: once a transaction is recorded
25 by the branch it cannot be changed remotely; everything

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1 can go wrong. But this is about facts not theories and
2 there is not a single example of Horizon causing losses
3 in any of the cases we've examined exhaustively during
4 the past few years.

5 "I've gone through these cases, every single one and
6 I have looked at all the facts. That means all the
7 facts, not just Horizon records."

8 Over the page:

9 "What we found and what the independent accountants
10 reviewing the cases have found is that the majority of
11 losses were down to human error, and some were,
12 regrettably, down to dishonesty. We cannot get away
13 from that."

14 Is that what you thought the outcome of the initial
15 investigation by Second Sight and the Mediation Scheme
16 was?

17 **A.** Well, our investigations didn't find there was any
18 evidence that the losses were caused by Horizon system
19 and that is what Second Sight concluded as well, and
20 some of it would have been the majority of losses.
21 I can't remember that we ever pointed to dishonesty but
22 it would have been one of the potential outcomes of the
23 investigations.

24 But I think, just going back to this, this is
25 a brief that's been put together for me. I can't

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1 that happens leaves a 'footprint', so there is an audit
2 trail that shows every keystroke, every transaction,
3 everything that has happened. We've looked at all of
4 that.

5 "Of course we have transaction corrections and
6 acknowledgements and the other tools needed to make sure
7 that branches can stay in balance but these must be
8 accepted by the branch and they do not make changes to
9 the original transactions themselves; they are recorded
10 separately.

11 "The system is independently audited, monitored and
12 managed and meets or exceeds industry accreditations."

13 Irrespective of the state of Post Office knowledge,
14 would you accept that this response to the allegation
15 regarding remote access does not actually address
16 whether remote access is possible?

17 **A.** No, it doesn't. I mean, this is -- I think you've said
18 this was 2015, isn't it, June 2015?

19 **Q.** Yes, 18 June 2015.

20 **A.** Yes, okay. No, it kind of skirts around things.

21 **Q.** It sidesteps it, doesn't it?

22 **A.** Yes, it does.

23 **Q.** Do you know why it sidesteps it?

24 **A.** I think this is because it's been put together by
25 a comms person.

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1 Q. Why would a comms person want to sidestep --
 2 A. I'm not --
 3 Q. -- the main allegation?
 4 A. -- sorry, I'm not necessarily saying they would want to
 5 do that or intended to do that it's just that, if I'd
 6 written this myself, I would have used different
 7 language and would have pointed to different things,
 8 because, in the mix of all of this, we had the scheme
 9 case that was the Bracknell issue, that Ron and Ian had
 10 been trying to get to the bottom of, and hadn't. So,
 11 you know, there were issues in the scheme that we were
 12 dealing with.
 13 So this is different -- I would have written this
 14 differently.
 15 Q. By mid-2015, was it the Post Office's position that it's
 16 best to avoid answering directly the question of whether
 17 remote access was possible because it will open us up to
 18 greater scrutiny?
 19 A. I don't believe so because we did an interview with
 20 Panorama around this time as well -- sorry, a meeting
 21 that we had taped, so it was slightly different language
 22 that was used in that. So, to answer your question, no,
 23 I don't think it was.
 24 Q. Lastly on the issue of remote access, then, in your
 25 witness statement, paragraph 161, you say that you were

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1 that was being constructed it; is that right?
 2 You, in your witness statement, said that the Post
 3 Office had a pre-approved wording of what you were to
 4 say to subpostmasters or within the Mediation Scheme or
 5 within any business as usual questions about remote
 6 access.
 7 Are you saying that this document that we're about
 8 to look at had been developed by the Post Office before
 9 it was distributed on 27 July 2016?
 10 A. No, I'm not saying that. What I was trying to do in my
 11 witness statement is kind of give a flavour of the
 12 strong messaging that was coming from POL over my time,
 13 in terms of Horizon and the remote access. So, no, I'm
 14 not saying that, in regard of this.
 15 Q. Can we look at the attachment, please, which is
 16 POL00022665. As we can see, it's a rider, ie something
 17 to slot into the response to the letter of claim:
 18 "Response to the factual allegation that Horizon
 19 does not record transactions accurately and/or the Post
 20 Office has been manipulating Horizon data."
 21 You will see what is set out, I'm not going to,
 22 given the time, read through it. Are you saying that we
 23 should understand that what is set out in here was
 24 pre-approved wording by Post Office of what you were to
 25 say before this document was produced?

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1 engaged with subpostmasters regarding investigation
 2 issues in the Mediation Scheme, any business as usual
 3 queries and other general queries within Post Office
 4 relating to subpostmasters, and where concerns related
 5 to remote access issues, the Post Office had
 6 a pre-approved wording for what you were to say, yes?
 7 A. Yes.
 8 Q. Can we look, please, to the documents you refer to as
 9 the pre-approved wording of what you were to say.
 10 POL00022659.
 11 It's an email from Amy Prime of Bond Dickinson, then
 12 a trainee, to, amongst others, you, in July 2016:
 13 "Please find attached the remote access wording for
 14 your review.
 15 "We shall provide any comments that counsel may have
 16 on this wording in due course."
 17 This appears to be being provided in the context of
 18 the response to the letter of claim?
 19 A. Yes.
 20 Q. Is that right?
 21 A. That's my understanding, yes.
 22 Q. So the people who were to become the GLO claimants had
 23 written through Freeths solicitors a letter of claim --
 24 A. Yes.
 25 Q. -- and this is part of the process by which the reply to

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1 A. No, I'm not -- sorry, I didn't mean that, and apologies
 2 for that -- how it's been taken, but this document and
 3 the information within the document will have and did
 4 pull from information within the organisation that we'd
 5 had over time and had been sense checked, and I think,
 6 if I remember this correctly, there was further
 7 sense-checking that needed to be done on the back of
 8 this note. So I don't think this was the absolute final
 9 version but it wasn't -- it wasn't pre-approved wording
 10 but it's something that -- the information had come from
 11 within the organisation.
 12 Q. Can we just look at your witness statement, then,
 13 please, at page 80, and paragraph 161 at the bottom.
 14 You say:
 15 "In respect of concerns raised by [subpostmasters]
 16 from 2012 onwards I would have normally been the person
 17 to engaged with [subpostmasters], for example
 18 investigating issues raised as part of the Scheme
 19 dealing with 'Business As Usual' queries (those raised
 20 outside the scheme and after the scheme had closed) and
 21 dealing with general queries ... that related to
 22 subpostmasters."
 23 Then this:
 24 "Where concerns relate to remote access issues, the
 25 Post Office that pre-approved wording for what we were

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1 to say, for example see [and you cross-referenced the
 2 two documents I just shown you] which confirms the
 3 approved wording as at July 2016."
 4 You told us already that what we see in the July
 5 2016 document is not the approved wording that would
 6 have been given before then.
 7 **A.** Yes.
 8 **Q.** So where are these approved wordings from the Post
 9 Office that were given from 2012 onwards, as to what you
 10 were to say as to remote access?
 11 **A.** So that would have been in the comms messaging.
 12 **Q.** What do you mean by that?
 13 **A.** So --
 14 **Q.** Ms van den Bogerd, we've looked at a series of direct
 15 emails to you, setting out what was said to you about
 16 remote access --
 17 **A.** Mm-hm.
 18 **Q.** -- from 2010 onwards. You appear to be suggesting here
 19 that the Post Office was, by contrast, giving you
 20 pre-approved wordings of what say. I'm asking, where
 21 are they, the pre-approved wordings?
 22 **A.** So what I've -- what I'm trying to say is, so there's --
 23 the information that we've walked through today, this
 24 morning, some of which I remember, some of which I don't
 25 and I think I've said that, and then what -- there was

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1 thorough here.
 2 **Q.** Can you point to a single email or other communication
 3 in which you correct any messaging which says there is
 4 no remote access or no remote access that
 5 a subpostmaster will not know about?
 6 **A.** Sorry, can you repeat that? Sorry?
 7 **Q.** Yes, can you point to a single email or other
 8 communication from you which corrects messaging, which
 9 says there is no remote access or no remote access about
 10 which a subpostmaster will not know about?
 11 **A.** I don't think so. I can't recall doing such an email.
 12 **MR BEER:** Sir, it has just gone past 1.10, I'm about to move
 13 to another topic, namely bugs, errors or defects.
 14 **SIR WYN WILLIAMS:** Of course, yes.
 15 **MR BEER:** Could we say 1.55, please.
 16 **SIR WYN WILLIAMS:** Yes, all right.
 17 **MR BEER:** Thank you very much.
 18 (1.10 pm)
 19 (The short adjournment)
 20 (1.55 pm)
 21 **MR BEER:** Good afternoon. Can you see and hear us, sir?
 22 **SIR WYN WILLIAMS:** Yes, I can.
 23 **MR BEER:** Good afternoon, Ms van den Bogerd, can we pick up
 24 the issue of bugs, errors and defects, please, by
 25 turning up your witness statement to page 13, at the

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1 a constant messaging from the business around remote
 2 access and Horizon and this is -- you know, these are
 3 the lines that have been approved by the business for us
 4 to use. So there was this constant use of messaging
 5 around what we should say and -- so that it's
 6 consistent.
 7 But what we've seen here, obviously in terms of
 8 where we've walked through this today, is the
 9 disconnect between a number of things that I've seen
 10 that I clearly haven't registered in terms of the
 11 messaging in parallel to that.
 12 **Q.** Is it that you didn't want to register the disconnect,
 13 as you put it --
 14 **A.** No, absolutely not.
 15 **Q.** -- and that, instead, you were part of the messaging,
 16 weren't you? This wasn't something that was happening
 17 to you; it was something that was caused by you?
 18 **A.** I don't think so. So I'm -- I don't have the technical
 19 expertise in IT and, therefore, I was very much
 20 receiving a lot of this myself, which is why it hasn't
 21 registered on some of the occasions, and where it's been
 22 changed, the messaging has been changed because it's
 23 coming from a different source. So I was absolutely not
 24 trying to massage this in any way; quite the opposite.
 25 But, as I said, you know, I've missed some stuff coming

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1 foot of the page, and you say in paragraph 29:
 2 "The first time I recall becoming formally aware of
 3 any bugs, errors and defects in the Horizon IT System
 4 ('BEDs' -- although this wasn't the term used at the
 5 time) is when [the Post Office] disclosed to Second
 6 Sight two anomalies -- 'Receipts and Payments Mismatch
 7 Problem' and the 'Local suspense Account Problem' which
 8 were detailed in the Interim Report 8 July 2013."
 9 Then paragraph 30 over the page, please, first few
 10 lines:
 11 "Prior to this, I was aware of general 'rumblings'
 12 of complaints and concerns about the integrity of
 13 Horizon, and when [you] took over responsibility for the
 14 Contract and Administration Team I became aware of
 15 claims the Horizon system itself was generating
 16 discrepancies in branches."
 17 Okay?
 18 **A.** Yes.
 19 **Q.** So going back to paragraph 29, at the foot of the page,
 20 what did you mean by becoming "formally aware".
 21 **A.** So in terms of the bugs themselves, that was the first
 22 time I became aware. I say "formally aware", you know,
 23 I said "rumblings", so I was aware that people were
 24 claiming that there might be something wrong with the
 25 system but it was only when those two bugs were

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1 disclosed that I became aware of bugs.

2 **Q.** But we've looked already -- I don't want to go back to
3 it unless we have to -- at the December 2010 email, by
4 which email you were notified of the receipts and
5 payments mismatch bug?

6 **A.** Sorry, I was notified in December 2010?

7 **Q.** Yes, December 2010?

8 **A.** I wasn't, I don't recall that. So the -- the document
9 you took me to, which was that record of the discussion,
10 I wasn't aware of that at the time.

11 **Q.** Can we look then, please, at POL00088956, second page.
12 The remote access issue, second line of the quotation:
13 "... came up when we were exploring solutions around
14 a problem generated by the system following a migration
15 to Horizon Online. This issue was quickly identified
16 and a fix put in place but it impacted around
17 60 branches, which meant a loss and gain incurred in
18 a particular week in effect disappeared from the
19 system."

20 **A.** As I've said, I don't recall seeing this at all. So,
21 for me, the first time of bugs, errors or defects, or
22 whatever word that was being used, was when there were
23 two disclosed to Second Sight as part of that work.

24 **Q.** Again, are you shutting your mind to the receipt of this
25 information because you know the difficulty that it

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1 **Q.** At the time, then, you were not aware of the provision
2 of notes concerning the receipts and payments mismatch
3 bug to members of the Legal team, the POL Legal team,
4 Jarnail Singh, Rob Wilson and Julian McFarlane --

5 **A.** No.

6 **Q.** -- in the context of the *Seema Misra* case?

7 **A.** No.

8 **Q.** You didn't know about that at the time?

9 **A.** It was much later that I heard about the *Seema Misra*
10 case.

11 **Q.** Did you know that a meeting was arranged in November
12 2010, including Dave Hulbert, Mark Weaver, Mark Burley,
13 Rod Ismay, Dave King, Will Russell, Ian Trundell, Emma
14 Langfield, Lynn Hobbs and Anita Taylor(?), to discuss
15 how to resolve the discrepancies generated by branches
16 or at branches by the receipts and payments mismatch
17 bug?

18 **A.** No, I don't believe I was. I can't --

19 **Q.** So this all came as very significant new news to you in
20 mid-2013; is that right?

21 **A.** In terms of the BEDs being disclosed, yes.

22 **Q.** Yes. Were you aware, at that time in mid-2013, of any
23 discussions within the Post Office senior management as
24 to how high up within the organisation knowledge of the
25 now three-year-old receipts and payments mismatch bug

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1 creates for you?

2 **A.** No, not at all. I would -- if I'd seen these and
3 remembered seeing it, I would have certainly -- it would
4 have been part of my consciousness going forward.
5 I really cannot see -- remember seeing this at all and
6 it was -- the first time was when Simon Baker produced
7 those two anomalies, as he called them.

8 **Q.** That can come down, thank you. Were you not aware, at
9 the time, then, ie in October 2010, that Fujitsu
10 formally notified the Post Office of the receipts and
11 payments mismatch bug?

12 **A.** I wasn't aware of that.

13 **Q.** The cross-reference for that -- it needn't be
14 displayed -- is FUJ0008117. Were you not aware at the
15 time that it happened, then, again in October 2010, of
16 a meeting -- I showed you the agenda or the plan for the
17 meeting earlier on -- between the Post Office and
18 Fujitsu to discuss the receipts and payments mismatch
19 bug?

20 **A.** I wasn't aware of that.

21 **Q.** Sorry?

22 **A.** Sorry, I wasn't aware of that. I said I was in
23 a different role in October. It was only when I came
24 into the Head of Network Services role, which brought in
25 Lynn and John, that I started to get involved.

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1 had gone?

2 **A.** No.

3 **Q.** On the publication of the Second Sight Report, did you
4 seek to ascertain when the Post Office first became
5 aware of that bug?

6 **A.** Sorry, the report that the two bugs were put into, the
7 interim report we're talking about?

8 **Q.** Yes.

9 **A.** No.

10 **Q.** Did you seek to ascertain which departments or which
11 individuals within the Post Office knew about that bug?

12 **A.** No.

13 **Q.** Why not?

14 **A.** Because the way it was presented was that we've got
15 these two bugs, so that was a surprise to me, and I was
16 reassured that it's routine, we've dealt with them, it's
17 been sorted, and I didn't push any further on it.

18 **Q.** Were you aware that the suspense account bugs, which is
19 the second of the two bugs which you say Post Office
20 made a disclosure about to Second Sight had, in fact,
21 been discovered by the Post Office in February 2012
22 before Fujitsu?

23 **A.** No.

24 **Q.** Again, did you ask similar questions: what did we know
25 about this bug? When did we first become aware of it?

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1 How high up within the organisation did knowledge go?
 2 **A.** No.
 3 **Q.** In fact, Second Sight mentioned a third bug, as well,
 4 the Callendar Square or Falkirk bug. That was known, we
 5 have evidence by the Post Office, way back in 2006. The
 6 cross-reference for that is FUJ00083721, no need to
 7 display that. Was your first knowledge of that when
 8 reading the Second Sight Report?
 9 **A.** I don't remember. So it was the two bugs that were
 10 disclosed was my first knowledge. I was aware of
 11 a third because it is some exchange in what's been
 12 disclosed that I was querying why we'd only given Second
 13 Sight two, if we already knew about a third, but
 14 I didn't know about that third at the time.
 15 **Q.** If it was really the case that the Second Sight Report
 16 revealed three bugs that you personally were not
 17 previously aware of, surely you would have wanted to
 18 know how that had happened?
 19 **A.** So, for the third one, I did question how have we only
 20 now realised that there's a third and we hadn't at the
 21 time because, if we had become aware -- and I wasn't
 22 involved in these conversations but if we'd become aware
 23 that there were two bugs, which we were and we
 24 disclosed, then surely at that point we should have
 25 asked "Are there any more?" But I wasn't involved in

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1 **A.** Not the lead. I was there to assist in terms of
 2 provision of information to them.
 3 **Q.** Who was the lead in terms of the engagement with Second
 4 Sight?
 5 **A.** Well, in terms of -- they were engaged by Alice, Paula,
 6 and Susan was there at the time. So it was Susan,
 7 really, in terms of the overall lead, I would have said.
 8 **Q.** But you say you were in charge of or responsible for the
 9 provision of information to Second Sight from the Post
 10 Office?
 11 **A.** Not formally. I was there to help them but --
 12 **Q.** Who was in charge of the provision of information?
 13 **A.** I don't know that we ever defined that because, at the
 14 start, this -- the whole engagement of Second Sight and
 15 the initial Inquiry and then into the scheme, it kind of
 16 evolved over time. And, even when we started in the
 17 scheme, we were developing it through the Working Group
 18 as we were going forward. So I don't believe there was
 19 anything -- any roles defined at the start.
 20 **Q.** At this time, this is before 8 July 2013, did you
 21 yourself consider what impact, if any, the revelation of
 22 the existence of three bugs in the system may have had
 23 on the criminal prosecutions that the Post Office had
 24 mounted sometime successfully over the previous decade?
 25 **A.** No, I didn't. I had no knowledge of -- I mean, I knew

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1 those discussions.
 2 **Q.** Was there any kind of post-mortem which examined "When
 3 did we, the Post Office, corporately, know about these
 4 bugs for the first time and what has been done with the
 5 knowledge that we had?"
 6 **A.** Not that I was aware of at the time. So the information
 7 that came it was given to Second Sight, I'm not sure if
 8 anything else -- I think I've seen something since in
 9 disclosure that said we did something but I don't
 10 remember. I wasn't involved in those conversations.
 11 **Q.** What was your role at the time of the first Second Sight
 12 Report?
 13 **A.** So I'd been working alongside Ron mostly and Ian, on the
 14 Spot Reviews. So my role was really to facilitate the
 15 provision of information to Ron that they needed, and
 16 that's what I was doing, was going into the business to
 17 find out where the information was that we needed for
 18 that. In doing that, I was also looking at the
 19 situations myself, which is why I got involved in the
 20 Lepton case, and understanding what had gone wrong in
 21 that case.
 22 **Q.** Were you leading for the Post Office?
 23 **A.** Sorry, leading?
 24 **Q.** Yes, were you the lead in the engagement with Second
 25 Sight?

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1 we had -- obviously, I knew we had a Security and
 2 Investigation Team and I knew that we were bringing the
 3 prosecutions ourselves, I knew -- well, it wasn't always
 4 known to me but that became known to me quite early on.
 5 But I had no -- other than being reassured that
 6 everything done, you know, there was a proper process
 7 for prosecutions, that it was done in line with the Code
 8 for Prosecutors, I had no insight into that. So I made
 9 no connection from those bugs to the previous
 10 convictions.
 11 **Q.** Whose responsibility was it to make a connection between
 12 the bugs and the prosecutions?
 13 **A.** That would be the Legal Team.
 14 **Q.** Who within the Legal Team?
 15 **A.** I'm not really -- I mean, in terms of my contact with
 16 Legal was mostly Rodric Williams and I had very little
 17 contact with Jarnail, and then Andrew Parsons from WBD,
 18 or Bond Dickinson, or whoever they were at the time.
 19 **Q.** Just to be clear, on the publication of the Second Sight
 20 Report, which mentions the three bugs, you're not aware
 21 of any investigation or introverted look by the Post
 22 Office of as to "When we found out about these bugs and
 23 what did we do in relation to them"?
 24 **A.** I don't think I was at the time. I've seen things
 25 through disclosure that we were looking at past cases

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1 but I wasn't involved in that.

2 **Q.** You tell us in paragraph 30 of your witness statement,
3 we've read it already, that you were aware before July
4 2013 of general rumblings of complaints?

5 **A.** Yes.

6 **Q.** Had that been for the entirety of your time in the Post
7 Office --

8 **A.** No.

9 **Q.** -- since Horizon was introduced in about 2000?

10 **A.** No, so it was really around the 2010 -- around that
11 time. So I think it was really when I took on
12 responsibility for the Contracts team and I think at
13 that time or there or thereabouts there was the Inside
14 Out programmes, so there were a couple of TV programmes,
15 one in the south and one in the Midlands, I think.

16 **Q.** So the rumblings that you speak about, as you call them,
17 is from about 2010 onwards?

18 **A.** Yes, I mean, there had been some postmasters saying that
19 it must be the system but not that I could have put my
20 finger on at the time.

21 **Q.** What do you mean not -- what could you not put your
22 finger on?

23 **A.** Not that I can remember where I'd heard that, in terms
24 of there are some issues. It was really around the
25 2010/2011 when I started really getting involved.

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1 "Richard or one of his team will be in touch in due
2 course."

3 Then, top of the page, Mr Ashcroft emails you and
4 says he agrees with Jill. He's got one of his team onto
5 it who he's asked to put together a checklist of obvious
6 things that have caused this discrepancy in the branch:
7 "If we can discount those it gives us a greater
8 level of confidence that it really is postmaster error."
9 He asked you whether you have any timescales on
10 this.

11 First of all, why was this being raised with you?

12 **A.** So Lower Eggleton, even those it was not in the Wales,
13 it was Wales and the Marches, so that would have come
14 under the area that I was responsible for.

15 **Q.** So this is a subpostmaster raising an issue of Horizon
16 system error as a possible cause of a discrepancy and
17 had seemingly deployed the view of an accountant to
18 support his view?

19 **A.** Yes.

20 **Q.** Yes?

21 **A.** So I'd forgotten about this until I had this in
22 disclosure. I do remember meeting with Steve Morgan,
23 and this brought it back. I can't remember -- I didn't
24 get disclosed his initial request, whether it came in in
25 writing but, back then, I would have had somebody

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1 **Q.** Let's have a look, then. Can we start by looking at
2 POL00178171. If we can look at the foot of the page,
3 please. This is 2004, and just remind us, in 2004, your
4 job would have been?

5 **A.** So I was Head of Area for the rural network in Wales.

6 **Q.** So the rural agency in Wales?

7 **A.** Yes.

8 **Q.** There's an email from Jill Camplejohn, the Contract
9 Support Centre Manager, under the heading "Lower
10 Eggleton", and she says:
11 "I have passed the file you sent to Richard Ashcroft
12 in problem management for one of his team to look at and
13 request information from Fujitsu Services.
14 "I do think that a telling point in this case is
15 that there are no calls to the helpline logged. I would
16 have thought that if he [I think that's the
17 subpostmaster] believed he had a problem, he would have
18 done that quite promptly. Isn't it amazing that the
19 accountant from a couple of doors away knows enough
20 about Horizon to put his name to the assertion but it's
21 a system problem. However, whilst I believe there is no
22 evidence to support system problems, I don't want to
23 make sweeping assumptions and would rather be certain
24 when the circumstances may lead to termination of
25 contract.

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1 working more closely with the branches and I was
2 overseeing.

3 **Q.** Does this fall into the category of a rumbling?

4 **A.** Well, I mean, this was -- back in 2004, Mr Morgan has
5 obviously raised concerns and I didn't know where to go
6 with those concerns, and then I've reached out, because
7 I didn't know Jill Camplejohn at the time, and that was
8 me trying to -- so he'd raised -- he wanted some
9 information from the system, and then I've reached out
10 to see where can -- you know, where can we get that
11 information for him, and I provided that to him.

12 **Q.** So would this be an early rumbling?

13 **A.** Yes.

14 **Q.** Do you know what was done as a result of it?

15 **A.** So I've, obviously -- I'd sent a letter to him, which
16 I saw in disclosure. I've provided him with the Horizon
17 logs, as he requested, and I don't remember -- I mean,
18 I'd asked him to then make good the loss, unless he
19 could establish something within that but, from the
20 information I had from this team, there was nothing in
21 those logs that pointed to the Horizon system. But
22 I don't recall what happened after that.

23 **Q.** Let's have a look then at POL00142481. Is this the
24 letter that you wrote to Mr Morgan --

25 **A.** Yes, that's the one I've seen, yes.

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- 1 Q. -- of the 1 March 2004, saying:
 2 "You have been supplied with a copy of the
 3 transaction log and event log to enable you further to
 4 analyse the cause of the discrepancy of £1,400-odd.
 5 I initiated a further analysis of these logs which
 6 reaffirmed that there is no evidence of a Horizon
 7 created discrepancy.
 8 "The Horizon system will not create a discrepancy
 9 solely by the user correcting an error they've
 10 previously made, in this specific case, reversing
 11 an incorrect remittance out of cheques provided that the
 12 cash figure declared is correct, the cheque figure held
 13 in stock is correct and the remittance out cheque figure
 14 is correct against the physical cheques dispatched to
 15 Data Central -- all of which appear to be in order.
 16 "My letter previously gave you [until a date] to
 17 make good the loss or provide supporting evidence that
 18 this discrepancy was generated by a systems error and
 19 not a user error. Please provide the evidence or make
 20 good the loss."
 21 Yes?
 22 A. Yes.
 23 Q. When you were asked to become involved in this, did you
 24 wish to understand what the root cause of the
 25 discrepancy was?

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- 1 A. So I asked our team, because Jill Camplejohn isn't
 2 Fujitsu, and then they've reached out to Fujitsu. So
 3 they -- so when I made some -- because I said I didn't
 4 know where to go with this, when I made some enquiries
 5 about where do I go to get the information, I was
 6 directed towards Jill Camplejohn and her team, I assumed
 7 at the time, were that liaison point into Fujitsu.
 8 Q. Do you accept, knowing what you know now, that it's not
 9 possible to identify system errors from the logs that
 10 were produced alone?
 11 A. I think, if there was something in the logs, that, you
 12 know, missed a transaction or something, but I think,
 13 you know, from a postmaster's perspective, they wouldn't
 14 have known what to look for. In 2004, I wouldn't have
 15 known what to look for either.
 16 Q. I was about to ask, were you qualified to look at the
 17 logs?
 18 A. No, so my --
 19 Q. Who was?
 20 A. So it was the team, Jill and -- sorry, I think it was
 21 Richard -- again, who I don't know that person. That
 22 was the team. I was looking to them for the expertise
 23 to be able to provide the, you know, the information to
 24 Mr Morgan and, when I referred to, you know, I've
 25 initiated further analysis, it was from them that that

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- 1 A. So I wanted to provide the information that Mr Morgan
 2 had requested so that he could understand what had gone
 3 on in his branch.
 4 Q. That's a slightly different thing. I'm asking did you
 5 want to seek to understand the root cause?
 6 A. So back in 2004, there wasn't a facility to investigate
 7 branch issues like we introduced in the scheme. It was
 8 very much the postmaster was required to produce the
 9 evidence to dispute the loss that he -- had been
 10 sustained in his branch so --
 11 Q. How would a postmaster produce evidence to dispute the
 12 loss in relation to a computer system to which he had no
 13 access?
 14 A. So he did have access to the computer system, it would
 15 have been for a -- it would have been for 42 days, back
 16 in those days, and then he reached out to me to be able
 17 to get some more information for him, which is what I've
 18 done. So, at this point, I've assisted as much as
 19 I could. I say, I did meet with Mr Morgan, so I don't
 20 know if I've done anything further because I can't see
 21 any -- I've had nothing else disclosed from him and
 22 I really don't remember but I do remember going to his
 23 branch and meeting with him.
 24 Q. So you asked Fujitsu to produce the logs for the case,
 25 yes?

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- 1 information came.
 2 Q. How were they qualified to analyse the logs to identify
 3 whether a system error caused the discrepancy?
 4 A. I don't know. I don't know, even if they were. But
 5 that was --
 6 Q. Do you think that they were qualified --
 7 A. I don't know if they were or not but that was the --
 8 that was the point of contact I was directed to within
 9 the business.
 10 Q. Okay, I'll move on. Can we look, please, at
 11 POL00178219. We're still in March 2014, we will see in
 12 a moment. Can we look at pages 3 to 4, please. If we
 13 look at the foot of 3, thank you, there is an email to
 14 you -- we can just see at the end, if we scroll right to
 15 the end -- from Clive Burton, from the Former
 16 Subpostmasters Accounts Team, Agents Debt 3 in
 17 Chesterfield. Just help us with what they were? What
 18 that team was?
 19 A. It was within the P&BA team in Chesterfield.
 20 Q. Do you know what the agent debt --
 21 A. I didn't at the time. I mean, I have since because I --
 22 Q. Okay, let's see what Mr Burton says.
 23 "Mrs Pugh was the subpostmistress at Chirbury post
 24 office from 21 April '99 to 3 September '01 when her
 25 contract for services was suspended.

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1 "The final audit resulted in a deficiency of
2 £9,000-odd but many error notices were later issued,
3 which increased the overall debt to £31,000-odd.
4 "Recovery has been referred to Jim Cruise of Legal
5 Services to pursue. Case management conference was
6 heard on 8 January 2004 and some directions have been
7 made.

8 "Our Legal Services Department have asked us to
9 prepare a number of statements regarding various
10 accounting errors that formed part of the debt. We are
11 in the process of preparing these.

12 "There are a number of other issues that our Legal
13 Department require clarification on and statements are
14 needed.

15 "It would be very much appreciated if you could
16 provide assistance with the following items or say who
17 to contact.

18 "(1) the defence alleges that the introduction of
19 the Horizon system itself caused problems and evidence
20 is needed about the training given to Mrs Pugh and, if
21 possible, evidence of the call logs to show whether
22 Mrs Pugh was seeking help in relation to the operation
23 of the system.

24 "Telephone link was cut between February and June
25 '01 and a statement about closure of the office."

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1 middle of the page 1?

2 **A.** Middle of page 1, yes, so the Emlyn --

3 **Q.** If we scroll down, "Attached are the call logs between
4 those two dates from this office", yes?

5 **A.** Yes, so this was the provision of information. I was --
6 I've been copied into some and not all of them, I think.

7 **Q.** Can we then see what Mr Hughes did at POL00178225, top
8 of the page, so we can see your email:

9 "Emlyn, can you deal?"

10 He says:

11 "Having spoken with Glenn regarding the issue below
12 and, in particular, regarding the Horizon question, he
13 suggested I contact you ... mentioned you supported
14 several offices within the former Chester cluster so if
15 it is possible you went to Chirbury and provided
16 assistance to Mrs Pugh in the early days."

17 So the question was somebody who went out to the
18 former Chester cluster to provide assistance as to
19 whether or not he went to that branch; is that right?

20 **A.** From -- that I can see from that email, yes.

21 **Q.** Do you know what happened after this, in relation to
22 this subpostmistress, Mrs Pugh, who had raised, in her
23 defence in County Court litigation Horizon being the
24 problem because of a system fault?

25 **A.** I don't know what happened after this.

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1 Then over the page:

2 "General statements are required as to how the
3 accounting system works at a sub post office and how
4 documents are created."

5 Going back to the previous page at the foot,
6 point 1, the defence alleges that Horizon itself caused
7 problems, yes?

8 **A.** Yes.

9 **Q.** Would this be amongst the category of "rumblings"?

10 **A.** From my memory, yes, because this -- and, again,
11 I didn't remember this and I did request further
12 disclosure to see what I did with this, and I've
13 concluded that this, for me at that point, was just
14 a routine request for information. So I forwarded on to
15 a Contracts Manager that was part of my team --

16 **Q.** So if we just go up on page 3, please. Is that the
17 email, "Emlyn, could you deal, please"?

18 **A.** Yes. So Emlyn Hughes was a Contracts Manager working
19 within my team at the time and he was more familiar
20 where to go for the information, which is what he's
21 done. He's reached out to a number of places.

22 **Q.** I think we can see further up the chain that you, on
23 23 March and then on 8 April, appear to have received
24 a list of call logs from NBSC in relation to Chirbury
25 between 2000 and 2004, yes? So if you look at the

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1 **Q.** Was this not the kind of issue that ought to have
2 triggered some investigation, a full and thorough
3 investigation?

4 **A.** So the investigation would have been done by the
5 Investigation Team, at this point. So anything into
6 a criminal case, it was the Security and Investigation
7 Team that would have done that --

8 **Q.** This isn't about a criminal case; this is about a civil
9 recovery --

10 **A.** Oh, sorry --

11 **Q.** -- seeking to recover £31,000 from Mrs Pugh?

12 **A.** I don't know. I mean, this was the first -- this, for
13 me, was a routine request because, in 2001 we'd moved
14 from a regionalised structure into the Head of Area
15 structure. I don't know what date, I think it was
16 probably around this date and then all the branch files
17 were distributed into the Head of Area and then they
18 were reaching out for information. The information they
19 required didn't sit within my team, which is why I'd
20 asked Emlyn to facilitate the provision of information.
21 So I'm not aware of what or, if any, investigation was
22 done into that at the time.

23 **Q.** Do you think some sort of investigation should have been
24 done if, in legal proceedings, the subpostmistress is
25 saying "The loss that you're seeking to recover from me,

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1 £31,000, was, in fact caused by the Horizon system"?

2 **A.** Yes.

3 **Q.** This was as early as 2004?

4 **A.** Yes, it should have been done.

5 **Q.** Do you think it should have been an independent

6 investigation, ie independent of the Post Office?

7 **A.** Well, I'm not sure about independent of the Post Office

8 but there should have been an investigation within the

9 Post Office. But, from my working knowledge and my

10 memory, there wasn't, certainly wasn't a function that

11 did that back then and, it was only when we started

12 working with the Second Sight and I started to bring

13 that team together, that we pooled together -- from my

14 perspective we pooled together knowledge and the

15 know-how to be able to put -- to be able to deal with

16 this type of request in terms of what, you know, what

17 has happened and can we understand what the cause of the

18 loss is? But I don't think it would have been done back

19 then.

20 **Q.** But why not, is my question. We've seen a couple of

21 examples now that happen to concern you in the roles

22 that you performed, relatively early on in the life of

23 Horizon, with subpostmasters raising the suggestion that

24 the loss attributed to them is in fact caused by

25 Horizon?

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1 I think it very much depended upon the people within

2 those areas in terms of the level of support that were

3 given to postmasters at the time.

4 So, you know, when I came out of that directly

5 managed and came into my area of postmasters, then I was

6 able to assist in some cases because I had the

7 knowledge.

8 With the Horizon in terms of providing the

9 information, I had to go to where I was directed to get

10 the information but my view is there should have been

11 a function to do that back then and there wasn't.

12 **Q.** What in the contract did you think placed an obligation

13 on the subpostmaster to show that a loss was caused by

14 the system rather than him or her? You said a moment

15 ago it was the wording of the contract?

16 **A.** Yes, so there's nothing in the contract that mentioned

17 the system at all. I mean, the contract had been in

18 place for some time before the Horizon system was

19 introduced.

20 **Q.** Did you know that the contract only required

21 subpostmasters to make good losses if it was through

22 their error or negligence?

23 **A.** Yes, I mean --

24 **Q.** So why did they have to prove anything? Why does the

25 Post Office not have to prove that the loss was through

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1 **A.** Mm-hm.

2 **Q.** Why was something not done to investigate that?

3 **A.** I think it would have depended upon the particular area,

4 that that was in at the time. So this would have been

5 Chester, at the time that she was raising issues, then

6 I would have expected the Chester cluster to have done

7 something with it, but there wasn't a formal approach,

8 there wasn't anything documented, there wasn't any

9 policy on it. It was very much, you know, it's up to

10 the postmaster to show that they're not responsible for

11 the loss. That's very much how it was.

12 **Q.** Why was it like that? Who decided that it should be

13 like that?

14 **A.** Because that was what was in the contract. That's how

15 the contract was --

16 **Q.** What are you thinking of, in particular, in the

17 contract?

18 **A.** So I think -- so when I came into -- so I'd started --

19 **Q.** That document can come down, by the way.

20 **A.** Sorry, I started in the directly managed or Crown

21 Network so I came in through that route and then, when

22 I came out of the branch structure and came into working

23 with subpostmasters, there were lots of things that

24 weren't documented, they weren't policies, there weren't

25 approaches, and then there was change of structures and

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1 the subpostmaster's error or negligence?

2 **A.** I think back then, the assumption was that, if there was

3 a loss in the branch, that it was the responsibility of

4 the postmaster.

5 **Q.** Why was there an assumption?

6 **A.** Because it was assumed it was user error.

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

8 **A.** Because it was assumed it was user error.

9 **Q.** Yes, but why? There's a lot of assuming going on.

10 **A.** Absolutely. I agree. There was.

11 **Q.** But why? Why does a multimillion pound business make

12 assumptions when it's got a written contract that

13 prescribes the circumstances in which a subpostmaster is

14 liable?

15 **A.** So looking back, there was no provision for the Horizon

16 system, there was no change to working practices. As

17 I said, when I -- you know, for Mr Morgan in Lower

18 Eggleton, there was no process for me to go and get

19 information. I had to find a contact to do that. So

20 there was no change in terms of policy or process or

21 working practices that I was aware of at the time.

22 **Q.** That, with respect, Ms van den Bogerd, doesn't really

23 answer the question. Did nobody read the contract and

24 think: hold on, this contract says we can only recover

25 money from subpostmasters in these limited

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1 circumstances? The subpostmasters have to prove
 2 nothing?
 3 **A.** That was the advice that we were getting from Legal at
 4 the time.
 5 **Q.** Who in Legal?
 6 **A.** From our -- well, back then, it would have been Royal
 7 Mail.
 8 **Q.** Yes, who in Royal Mail?
 9 **A.** I didn't get involved in the early days but I think when
 10 I first started getting involved, it was around 2011
 11 which is when we had the Shoosmiths case, and it would
 12 have been -- and I didn't know -- I have never met any
 13 of them, actually, but it would have been those on the
 14 copy list, it would have been Mandy Talbot, I think
 15 Rebekah Mantle, probably Rob Wilson, I think. But these
 16 are people I didn't have routine contact with at all.
 17 **Q.** Was it the case that you very well knew that the
 18 contract did not entitle the Post Office to recover
 19 money from subpostmasters in any or all circumstances
 20 but that's what the Post Office pretended it said?
 21 We've seen in the Inquiry, Ms van den Bogerd, many
 22 letters to subpostmasters, which say just that: "You're
 23 responsible to make good any losses", ignoring the terms
 24 of the contract completely?
 25 **A.** So if I go back to -- I was in Network and that's where
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1 point, who reported into Kevin Gilliland. It was two
 2 levels down below Exec Director.
 3 **Q.** We can see what Mr Ismay is proposing:
 4 "To define and manage a coordinated response plan
 5 which defends existing challenges and deters future
 6 challenges in the most pragmatic and efficient manner."
 7 Do you know why that was the proposed strategy: to
 8 deter future challenges?
 9 **A.** I don't, actually. As I said previously, this was me
 10 coming into this -- into this space quite new and
 11 I think the only reason I was in this was because of my
 12 involvement with the Ferndown case, which was -- and my
 13 moving in to the role that took on responsibility for
 14 the contracts.
 15 **Q.** Do you know why a business would not instead have as its
 16 purpose to examine on their merits any challenges that
 17 its agents may bring?
 18 **A.** Well, it should have. I mean, this is a very biased
 19 kind of view from Rod when he's put this together.
 20 **Q.** Just looking further up on the distribution list, do you
 21 know whether any of those people, many of whom we're
 22 familiar with, said, "Hold on Rod, this a biased view"?
 23 **A.** So the senior people in here, Mike Young, Exec Director;
 24 Kevin Gilliland -- sorry, the format has gone, I can't
 25 obviously read it -- obviously, Susan --
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1 I was, and it was the management of the letters and the
 2 breaches of contract was managed within Network -- well,
 3 it changed over time but it was primarily the Contract
 4 Managers, but it was always under the direction and the
 5 instruction of the Legal team. So there was a very
 6 close working relationship between the Contract Managers
 7 and that Legal team around what they should and
 8 shouldn't do.
 9 **Q.** You mentioned what happened or what changed in 2011 when
 10 the Shoosmiths claims were threatened?
 11 **A.** Yeah.
 12 **Q.** Can we turn to that, please. POL00294879. This is
 13 a briefing document or proposed response to challenges
 14 regarding the Horizon system. It's from Mr Ismay, we
 15 can see, it's dated 12 October 2011, and it's addressed
 16 to you, yes --
 17 **A.** Yes.
 18 **Q.** -- and others, and copied to others. We can see the
 19 heading is "The JFSA and Shoosmiths/Access Legal", which
 20 was essentially part of Shoosmiths, "Response to
 21 Challenges Regarding the Horizon System Proposed
 22 Steering Group and Purpose". You, I think, at this
 23 time, held a very senior position: Head of Network?
 24 **A.** It was quite senior, it wasn't very senior but it was
 25 quite senior. So I reported in to Sue Huggins at this
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1 **Q.** Mike Young, COO?
 2 **A.** Yeah, Susan, Legal and Compliance Director, but General
 3 Counsel as I knew her; Chris Day, Chief Finance Officer.
 4 Sue I think was my line manager at the time. John Scott
 5 was very senior. So these are all very senior people in
 6 here and I don't recall that anybody challenged anything
 7 here but they might have. I don't know. As I said,
 8 this was me coming --
 9 **Q.** Did you challenge it?
 10 **A.** I didn't. This was me stepping into this as a new
 11 person in this arena.
 12 **Q.** That purpose, that strategy that's set out there, that
 13 was the strategy that the Post Office maintained largely
 14 until you left, wasn't it?
 15 **A.** I don't know. I disagree. I think, you know, what
 16 I tried to do, especially, was try to get under the skin
 17 of what had gone -- happened in branches and to
 18 investigate those cases. So I wouldn't say I was in
 19 this space at the start in this anyway; I didn't
 20 challenge it because, as I said, I came into this new.
 21 But as I left, I was clearly into a different space.
 22 **Q.** Let's look at what Mr Ismay said under "Background":
 23 "Throughout the last 10 years the Horizon system has
 24 been subject to a number of unfounded criticisms in the
 25 national press."
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1 Reading this at the time, would you have known what
 2 that suggestion was based on --
 3 **A.** No, I mean --
 4 **Q.** -- that criticisms were unfounded?
 5 **A.** Sorry, which bit?
 6 **Q.** That criticisms were unfounded?
 7 **A.** So I think this comes back to my earlier comment about
 8 rumblings. You know, I was aware of some things, very
 9 few, I -- certainly this was me coming more into
 10 a national view of this because everything prior to this
 11 had been very contained within my area of work, as
 12 opposed -- because there wasn't anything on a kind of
 13 business level at that point, so this was me seeing this
 14 at the national level for the first time, I think.
 15 **Q.** "It has also faced questions in the Houses of Parliament
 16 and allegations in court by former subpostmasters and
 17 their legal defence teams. Post Office has consistently
 18 won its prosecutions and presiding judges have made
 19 statements which had been expected to deter further
 20 baseless allegations, however the challenges continue to
 21 be made."
 22 Do you know whether the statement "The Post Office
 23 has consistently won its prosecutions" was true or
 24 false?
 25 **A.** I would have no understanding of that, at the time.

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1 to take to court where the defence blamed Horizon."
 2 Do you know what that's a reference to, "cases that
 3 the Post Office wanted to take to court"?
 4 **A.** No, I would have no knowledge of the cases at that
 5 point.
 6 **Q.** "The Post Office is confident that the Horizon isn't at
 7 fault."
 8 Do you know on what basis that statement was made,
 9 the confidence that Horizon was not at fault?
 10 **A.** No, other than that was the understanding within the
 11 business.
 12 **Q.** You refer in your statement to that, the messaging
 13 coming from the business, the messaging from the Post
 14 Office; which person, which individual person, was given
 15 you that messaging?
 16 **A.** There wasn't an individual person. I remember when
 17 Horizon was installed and rolled out, so that the
 18 message was this is the most secure -- the largest and
 19 the most secure system in Europe and I don't know who
 20 said that but I always remembered that and that, in
 21 itself, gave confidence in that system, but I can't say
 22 that I ever remember a particular person but that was
 23 the general messaging and certainly the feeling what was
 24 believed within the organisation.
 25 **Q.** So you can't identify an individual?

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1 **Q.** Would you have just accepted that on its face, that the
 2 Post Office --
 3 **A.** Yes.
 4 **Q.** -- had consistently money its prosecutions?
 5 **A.** I would have taken that at face value, yes.
 6 **Q.** Did you know of any presiding judges that had made
 7 statements that it had been hoped might deter 'baseless
 8 allegations' but, despite the work of the judges, the
 9 challenges continued to come?
 10 **A.** Not that I could recall.
 11 **Q.** Again, would you have taken what Mr Ismay said as being
 12 true?
 13 **A.** At this point I would have, yes.
 14 **Q.** "The situations have arisen in a minority of cases where
 15 the Post Office has dismissed the subpostmaster for
 16 financial irregularities and the subpostmaster has
 17 claimed that it was the accounting records that were
 18 wrong due to IT issues, rather than the money had been
 19 stolen.
 20 "Shoosmiths are acting for several former
 21 subpostmasters who have come together in the JFSA. [The
 22 Post Office] has received commonly worded letters before
 23 action, these are precursors to claims for damages, they
 24 request significant materials.
 25 "The Post Office had around 20 cases which it wished

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1 **A.** No, and it would have been over a number of years. It
 2 wouldn't have been, you know, just one person. It was
 3 that was the -- that was the understanding, general
 4 understanding, within the organisation at the time, that
 5 I was aware of. I mean, there's parts of the
 6 organisation I wasn't aware of that I've since seen
 7 quite damaging documents on but I wasn't aware of that.
 8 **Q.** What are you referring to there?
 9 **A.** Well, just the comments in, you know, the receipts and
 10 mismatch, those type of "We need to keep this quiet, we
 11 don't want the Horizon integrity to become known", those
 12 are the things I'm referring to.
 13 **Q.** When we asked questions of those people at those levels,
 14 they say: it was the people that above us that were
 15 telling us that Horizon is the largest system outside
 16 defence in Europe; it's very secure; processes X million
 17 transactions a day; Y billion transactions a year;
 18 there's no faults with Horizon; it's been independently
 19 assessed; auditors have given it a clean bill of health;
 20 it was the people above us -- ie you, people of your
 21 level -- that were passing that message down to us.
 22 **A.** Well, it wasn't me at my level then, because I wasn't at
 23 that level. But just looking at -- I mean, if you look
 24 at the distribution lists on here I was one of the more
 25 junior people on this list. As I said, I'd just started

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1 to come into this and, therefore, I wouldn't have
 2 challenged and I would have taken everything at face
 3 value at this time because I was new to this space.
 4 **Q.** I think you were responsible for communicating the Post
 5 Office's messaging to ministers or Members of
 6 Parliament?
 7 **A.** No, not at this time.
 8 **Q.** Did you not attend meetings with MPs?
 9 **A.** Well, I would have, but not at this time, so my -- in
 10 terms of the --
 11 **Q.** This can come down.
 12 **A.** Sorry, in terms of the meetings I attended with MPs, it
 13 was as we -- it was 2012, as we were getting into
 14 that -- the Second Sight investigations and, obviously,
 15 we've got documents that refer to those. Prior to this,
 16 I would have been working in a regionalised role.
 17 I might have had some local meetings with MPs but it
 18 would have been other normal kind of business that
 19 I can't remember exactly but it was in 2012 that
 20 I really started getting involved in this.
 21 **Q.** You met, I think, with MPs twice on 10 May 2012 and
 22 18 June 2012?
 23 **A.** That's correct.
 24 **Q.** That was prior to the Second Sight Interim Report,
 25 obviously, a year before then?

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1 an issue but that trust in the Post Office as a brand is
 2 absolutely paramount.
 3 Were you involved in briefing Ms Vennells or
 4 Ms Perkins for this meeting?
 5 **A.** Not in relation to the narrative you're seeing here. So
 6 my -- what I'd been asked to do for the May meeting was
 7 there were two cases that they wanted me to be able to
 8 pull the information together on, to be able to talk
 9 through at the first meeting, and the two cases -- it
 10 was the *Jo Hamilton* and *Tracey Merritt* cases, because
 11 they were the constituents for both of those MPs.
 12 That's what I was asked to do.
 13 Then that flowed -- the June meeting was a follow-up
 14 to the -- that May meeting, and with the an extended
 15 audience. So my involvement was not in pulling together
 16 the briefing information other than my specific slot on
 17 the agenda, as it were.
 18 **Q.** Were you party to any discussion with either or both of
 19 Ms Perkins or Ms Vennells beforehand, in which it was
 20 decided that the thing that should be mentioned is the
 21 temptation that faces subpostmasters?
 22 **A.** No.
 23 **Q.** "We should try and drop a little poison in the MPs'
 24 ears -- drip a little poison in the MPs' ears"?
 25 **A.** Not at all. I wasn't party to that conversation.

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1 **A.** It was before Second Sight had been engaged, actually.
 2 **Q.** Can we look at the second of those meetings, which you
 3 attended, with, I think, six MPs, including James
 4 Arbuthnot, by looking at JARB0000001. Can you see the
 5 attendee list?
 6 **A.** Yes.
 7 **Q.** If we scroll down a little bit, we see it includes you
 8 and this is the minute of the meeting of the 18 June.
 9 Can we look, please, at the foot of page 1. Alice
 10 Perkins, then the Chairman of the company, gave
 11 background information and the Post Office's
 12 perspective: it's a completely separate entity; she
 13 became aware of the issue when she joined in August
 14 2011; it was very serious; the Post Office recognised
 15 full well that the matter was very serious for the
 16 subpostmasters and mistresses.
 17 Over the page, second paragraph:
 18 "She said that the matter involved treading
 19 a tightrope regarding questions of money. The Post
 20 Office and its staff are stewards of large quantities of
 21 cash. The cash does not belong to the Post Office.
 22 It's in transit as it comes through the Post Office.
 23 There is the issue of trying not to put temptation in
 24 people's way."
 25 Then Ms Vennells begins by saying that temptation is

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1 **Q.** Was there a deliberate strategy to put that idea in the
 2 MPs' minds, right at the beginning of the meeting,
 3 focusing on the temptation faced by subpostmasters?
 4 **A.** I don't think there was but I can't comment. I mean, if
 5 I go back to the May meeting, I wasn't in all of the
 6 meeting with the MPs, so the format or the running order
 7 was that Alice -- it was Alice and Paula, and I'm not
 8 sure if Alwen actually met with James Arbuthnot, as he
 9 was then, and Oliver Letwin, both MPs. The agenda had
 10 a number of people on there, I was one of them, and
 11 I had a slot.
 12 So, basically, we were waiting outside the meeting
 13 room or in the café area of the building, I think, and
 14 we were called in to do our slot. So I wasn't party to
 15 the preamble for that meeting.
 16 **Q.** Ms Vennells continues:
 17 "Of the 11,800 employed only a tiny number are
 18 presenting cases where there's an issue of alleged fraud
 19 ... the problem is therefore relatively very small.
 20 "The Horizon system is very secure. Every keystroke
 21 used by anyone using the system is recorded and
 22 auditable."
 23 Did you know that that was the case?
 24 **A.** Not firsthand, no.
 25 **Q.** Did you believe what she said: that every keystroke --

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1 A. I did.
 2 Q. -- used by anyone using the system is recorded and
 3 auditable?
 4 A. I believed that was -- that was my CEO. I had no reason
 5 not to believe her.
 6 Q. Do you know who briefed her?
 7 A. I don't. What would normally happen is that the
 8 briefing would come from the relevant departments,
 9 I would have expected it to come from our IT function
 10 and that would have been, I think, Lesley was the Chief
 11 Information Officer at the time.
 12 Q. Would you expect, therefore, that to come from Lesley
 13 Sewell, the Chief Information Officer?
 14 A. That would be my expectation but I don't know if that
 15 happened.
 16 Q. Can we must have on in the meeting please, to page 3.
 17 One of the MPs, Andrew Bridgen, at the top of the page,
 18 asked if there had been any case where the discrepancy
 19 was the fault of the system. Do you see, three passages
 20 up from the foot of the page that's being displayed
 21 there:
 22 "Paula Vennells said that going back to Andrew
 23 Bridgen's question, there had not been a case
 24 investigated where the Horizon system had been found to
 25 be at fault."

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1 Q. I think it follows that you wouldn't have been aware at
 2 this time, in June 2012, that at least three
 3 subpostmasters had, in fact, been acquitted?
 4 A. I wouldn't have known.
 5 Q. Did you know about the case of Nichola Arch, accused of
 6 stealing £32,000 and unanimously acquitted by a jury at
 7 Bristol Crown Court --
 8 A. That's not a name I'm familiar with.
 9 Q. -- having said the system was at fault for the alleged
 10 shortfall and that she had repeatedly reported the
 11 matter to the helpline but had got absolutely nowhere
 12 with them?
 13 A. I wasn't aware of that case.
 14 Q. Were you aware of the case of Suzanne Palmer, who'd been
 15 acquitted by a jury in Southend Crown Court in January
 16 2007 and had said in her defence that the Horizon system
 17 was responsible for the loss and simultaneously
 18 prevented her from challenging any Horizon figures with
 19 which she had not agreed?
 20 A. No, and, again, it's not a name I'm familiar with.
 21 Q. Were you aware that in 2006 in Northern Ireland a lady
 22 called Maureen McKelvey was acquitted by a jury --
 23 A. No.
 24 Q. -- and that, in the course of her trial, it had come to
 25 light that an Area Manager, her Area Manager, had

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1 Did you know whether that was true or false?
 2 A. I didn't know either way. I believed it to be true
 3 because that's what she said but I didn't know either
 4 way.
 5 Q. Do you know who briefed her, if she was briefed to say
 6 that, to say that?
 7 A. I don't know. I mean, if it -- it depends what she's
 8 referring to as the case. If she's talking about
 9 a criminal case, then I would have expected that
 10 briefing to come from someone in the Legal Department.
 11 But it's not specific and I really -- I don't know, I'd
 12 be speculating.
 13 Q. Can we go back to page 2 in that connection, please. At
 14 the foot of what Ms Vennells said there:
 15 "Every case taken to prosecution that involves the
 16 Horizon system thus far has found in favour of the Post
 17 Office."
 18 Did you know whether that was true or false?
 19 A. I didn't know either way.
 20 Q. Would you believe it because your CEO was saying it?
 21 A. Yes.
 22 Q. Do you know who briefed her, if anyone, to say that?
 23 A. Again, I don't know who but I would have expected that
 24 to come from the Legal Team, given it was talking about
 25 prosecutions specifically.

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1 experienced problems with balancing Horizon at her
 2 terminal when she had come in to examine the system?
 3 A. I wasn't aware of that at all.
 4 Q. Who would be responsible for -- putting it neutrally --
 5 fact checking the type of information that Ms Vennells
 6 is telling a collection of MPs here -- every case
 7 involving Horizon that's been taken to prosecution has
 8 found in favour of the Post Office -- when that's just
 9 false? Who'd be responsible for putting together
 10 information that would allow a CEO to say something like
 11 this?
 12 A. I'm not sure whether there was one person overall --
 13 with overall responsibility. My experience of how the
 14 business worked was that there might be somebody holding
 15 the pen on the brief but they would then reach out to
 16 the relevant directors or heads of, in those particular
 17 areas, to get the appropriate response. So looking at
 18 this, I would have expected this to go into the Legal
 19 Team.
 20 Q. Put it another way Ms van den Bogerd: would you expect
 21 careful and diligent checks to have been made before
 22 going on the front foot?
 23 A. Absolutely.
 24 Q. Because that's what this is: this is going on the front
 25 foot, isn't it? It's facing the MPs down?

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1 A. Yeah.

2 Q. It's saying, "Move along, MPs, there's nothing to see
3 here". That's what this --

4 A. Yes.

5 Q. That's what that line is saying, isn't it?

6 A. Well, if it's saying every case, that's quite a strong
7 opening statement. So I agree.

8 Q. It's the kind of information where she's using the court
9 system as a prop, almost, "It's not just us bringing
10 cases; it's the juries and the court system that's
11 finding them guilty. You can be assured, MPs, that
12 there's nothing to see here".

13 A. I can't disagree with that.

14 Q. It's consistent with Mr Ismay's plan, as well, of 2011,
15 isn't it: robustly defend in the hope of deterring
16 further challenge?

17 A. In terms of his purpose, his opening, yeah, I agree.

18 Q. You can't help us to establish the steps that were taken
19 to confirm the veracity of information given to Members
20 of Parliament here?

21 A. I wasn't involved so I don't know where the information
22 has come from. I'm not actually sure who held the pen
23 on the brief.

24 MR BEER: Thank you. Sir, I wonder if we could take a break
25 there. I think it's between 2.55 and 3.00. I wonder

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1 "Key Messages", it's essentially a speaking note?

2 A. Yes.

3 Q. If we could look at that page, please, as well as
4 looking at JARB000001. Thank you. So we can see that
5 the overall introductions were, indeed, given by
6 Mr Arbuthnot and then Alice Perkins did speak and you
7 can see, to an extent she follows the briefing or the
8 speaking note, you can see second bullet point on the
9 right, "Take this issue very seriously", her second
10 paragraph of the minute "Very serious one for the Post
11 Office"; mention of reputation, which equates to the
12 second bullet point, yes?

13 A. Yes.

14 Q. Then you can see her last line of the minute, "Very
15 serious for subpostmasters and mistresses involved as it
16 was invariably life changing", equates to the second
17 bullet point "This impacts the lives of individuals",
18 yes?

19 A. Yes.

20 Q. Then go over the page on the left side, please:
21 "Enormous change at the Post Office. Tightrope
22 regarding questions of money."
23 Money is mentioned on the second bullet point on the
24 right, "Public money is at stake". Then there's the
25 line, there is the issue of trying not to put temptation

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1 whether we could break until 3.10?

2 SIR WYN WILLIAMS: Yes, certainly.

3 MR BEER: Thank you, sir.

4 (2.57 pm)

5 (A short break)

6 (3.10 pm)

7 MR BEER: Ms van den Bogerd, can we look at the briefing for
8 the meeting that we were just talking about on 18 June
9 2012 by looking at POL00027722. I think you're familiar
10 with this document. Was it common for a briefing pack
11 like this to be put together for any significant
12 meeting, in particular with MPs?

13 A. Yes, it was.

14 Q. This is, I think, 33-odd pages long. You can see that
15 there's an index at the front, if we go to page 2. The
16 attendee list is set out and then proposed agenda is set
17 out with the lead from the Post Office or the MPs being
18 identified and the minutes to be allocated to their
19 speaking part. As you've said already, you were slated
20 to deal with two cases?

21 A. That's correct.

22 Q. If we go over the page to the third page, please. We
23 can see Mr Arbuthnot was going to give an introduction
24 and then, as in fact happened, Ms Perkins was to speak.
25 Would you understand these to be -- it's entitled

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1 in people's way. That doesn't appear to be something
2 that she was briefed to say, does it?

3 A. It wasn't included in the briefing, the initial briefing
4 pack.

5 Q. Was there another version of this briefing pack then?

6 A. Not that I'm aware of.

7 Q. I think this is the latest iteration of the one we've
8 been given?

9 A. That's what I believe, yes.

10 Q. Just help us with these things. When you're going into
11 a meeting like this, is there, in addition to the formal
12 briefing, a kind of a scrum-down beforehand, in which
13 people exchange ideas and come up with additional lines?

14 A. There might be on some occasion, if there was one on
15 this one I wasn't involved in. But, as ever, these are
16 briefing packs, they're not meant to be scripts, they're
17 meant to be "This we would like you -- think you should
18 be covering".

19 Q. I'm just going to examine the three things I've
20 highlighted in the meeting -- the temptation spoken to
21 by Ms Vennells and Ms Perkins; the line "Every case
22 taken to prosecution involving Horizon has founding in
23 favour of the Post Office" --

24 A. Mm-hm.

25 Q. -- and the line "There's never been a case investigated

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1 where Horizon has been found to be at fault" -- and just
 2 see whether any of those three big claims appear in any
 3 of the briefing notes that were distributed before the
 4 meeting?

5 So, if we go to what Ms Vennells says, so if we
 6 could turn over to the page on the right-hand side,
 7 please: confirm above; postmasters are key to our
 8 business; support our branches we have a Helpdesk;
 9 Horizon is used in branches to manage accounting;
 10 subpostmaster has any questions or concerns; she's
 11 confident about the integrity of Horizon built on robust
 12 principles of reliability and integrity; undergone many
 13 external audits and no problems of this nature have ever
 14 been raised.

15 "On a technical level ..."

16 Then there are three bullet points:

17 "Occasionally we get incidents of fraud, this is
 18 unfortunate as it is public money at stake, it is
 19 important that we protect it.

20 "Even in cases of fraud we do try to keep the agenda
 21 with care and respect."

22 So the line about "Every case taken to prosecution
 23 that involves the Horizon system has found in favour of
 24 the Post Office", was not part of her briefing either,
 25 was it?

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1 **A.** Yeah.
 2 **Q.** It's all about the temptation; we've never lost a case;
 3 Horizon never been found to be at fault: where they came
 4 from.
 5 **A.** I can't see from the information that they've come out
 6 of this. I mean, this seems to have been from --
 7 **Q.** You were in the meeting. Did you think "Hold on,
 8 goodness me, Paula Vennells has gone off the reservation
 9 here"?
 10 **A.** So for this meeting, which is different to the May
 11 meeting, I was in the whole of this meeting. So it
 12 wasn't as if I just came in for the slot. I was
 13 actually in all of this meeting. It's not unusual, from
 14 my experience, for, you know, there to be a briefing
 15 pack or speaking note that the person who's then -- that
 16 was directed at might change it, without feeding back to
 17 the rest of the attendees -- as in the rest of us. It's
 18 not that wasn't unheard of. So --
 19 **Q.** Freestyling?
 20 **A.** Well, I wouldn't say freestyling but I suppose adding
 21 their own potential emphasis or --
 22 **Q.** These aren't points of emphasis, are they? They're big
 23 claims, aren't they?
 24 **A.** I'm saying in terms of how they would normally approach.
 25 I'm not saying in this case, I'm saying in general

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1 **A.** No.
 2 **Q.** Then, if we go to page 3 on the left-hand side, please,
 3 the line in the middle of the page:
 4 "Paula Vennells said that going back to Andrew
 5 Bridgen's question, there had not been a case
 6 investigated where the Horizon system had been found to
 7 be at fault."
 8 That doesn't seem to have been part of her briefing
 9 either, does it?
 10 **A.** Not from the other argument, no.
 11 **Q.** So I'll ask again, to your recollection, was there
 12 anything done outside the preparation of this 33-page
 13 briefing pack for Ms Perkins and Ms Vennells to give
 14 them information to deploy at the meeting?
 15 **A.** Not that I'm aware of or can recall. Paula and Alice
 16 might have decided to meet themselves --
 17 **Q.** Sorry, say again?
 18 **A.** I said Paula and Alice might have decided to get
 19 together themselves, if they wanted to discuss kind of
 20 what they were going to cover but I don't recall --
 21 I don't remember being in another meeting because,
 22 normally, you know, you'd had a prep meeting and then
 23 you would go into the actual meeting. So, sorry, I --
 24 **Q.** I'm just trying to examine where these three big claims
 25 come from?

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1 terms.
 2 **Q.** Let's look at this case. You couldn't really say these
 3 are points of emphasis, can you?
 4 **A.** They've chosen to shine a spotlight on to certain
 5 aspects of the briefing pack and bring it more to the
 6 fore, is what I'd say, but --
 7 **Q.** None of these are in the briefing pack?
 8 **A.** No, well, it touches on some of it, the general theme,
 9 but ...
 10 **Q.** Go back to the left-hand side, please on page 2:
 11 "Every case taken to prosecution involving Horizon
 12 thus far has found in favour of the Post Office."
 13 Where is that touched on in the briefing pack?
 14 **A.** Other than the reference to occasional incidents of
 15 fraud.
 16 **Q.** That's a completely different point. That's about the
 17 incidents of fraud. What Ms Vennells is recorded as
 18 having said is, when the cases get to court, we always
 19 win.
 20 **A.** Sorry, I just -- I was involved in briefing, the
 21 briefing pack. I was involved in that. I don't recall
 22 anything in between to get to the final version. So
 23 I think I would just be speculating. But I don't --
 24 I don't remember any further conversations to say,
 25 "We're actually going to dial this up or dial this

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1 down".

2 **Q.** That's what I'm asking, largely in advance of

3 Ms Vennells and Ms Perkins coming to give evidence to

4 us: was there an occasion, to your knowledge, at which

5 the information we see, "Let's tell them about

6 temptation, let's tell them about Horizon always winning

7 in court -- the Post Office always winning in court --

8 let's tell them that when any Horizon case has been

9 examined, it's never been found to be at fault".

10 **A.** So I remember this meeting. I remember the May meeting.

11 I remember the prep meetings. I don't remember anything

12 else in between and just going back to what we've said,

13 out of the three things, the bit about the temptation is

14 the one that I would have said something on. I mean,

15 I wouldn't have been aware of the other information.

16 **Q.** Why would you have said something about temptation?

17 **A.** Because, as I said earlier, my view and very strong

18 view, is that postmasters were very honest, hardworking,

19 decent people. They didn't come in to defraud the

20 business. They were -- there were occasional situations

21 where, as I would say, the situations got the better of

22 the postmaster, and I've got, you know, live examples of

23 that from my own experience, and I would have said, at

24 that point "Well, look just remember these are very rare

25 occasions". The other two, I wouldn't have been able to

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1 remember, in readiness for the Second Sight Report?

2 **A.** Yes.

3 **Q.** To what extent were you involved in formulating this

4 briefing?

5 **A.** I don't really remember, other than -- I'm trying to

6 think of the timeline. So when -- with Project Sparrow

7 and Belinda, who was the Programme Director for the

8 project, then her and her team typically would have held

9 the pen but, in terms of aspects that I was involved in,

10 I would have fed into that. So it would have been

11 a collective -- usually a collective approach to getting

12 to the content of such a briefing. But I actually can't

13 remember exactly on this one.

14 **Q.** If we look at page 7, please, a passage that we haven't

15 looked at before. So it's the foot of page 6, in fact.

16 Can we see the forward strategy heading --

17 **A.** Yes.

18 **Q.** -- and then, if we go on to the following page, page 7,

19 those four paragraphs. To what extent were you involved

20 in formulating this forward strategy?

21 **A.** So I was aware -- I was involved in conversations. In

22 terms of was I a driving force in the strategy for this?

23 No, I don't believe I was.

24 **Q.** Who was the driving force in the strategy?

25 **A.** I'm trying to remember. So if we look at, in terms of

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1 comment on, and that's why I'm saying I don't remember

2 a conversation in between those two things.

3 **Q.** Then, lastly, you were in the meeting when Ms Vennells

4 said these things: every case taken to court, we win --

5 **A.** Yeah.

6 **Q.** -- and Horizon, when examined and investigated, has

7 never been found to be at fault. Did those things

8 strike you, in the course of the meeting, "Hold on, the

9 Chief Executive has gone off-piste here"?

10 **A.** Not really. I mean, I would have taken that as she has

11 a broader knowledge than I have and she has information

12 that I don't have, and that wouldn't be unusual, given

13 my role. I mean, if you think my role in here was to

14 talk to two cases, then that wouldn't -- I wouldn't have

15 seen that as being unusual.

16 **Q.** Can we take both of those down, please, thank you, and

17 turn to the Second Sight initial investigation. I'm

18 going to move through and not examine the process by

19 which Second Sight conducted its initial examinations,

20 and investigations or the provision of information to it

21 by the Post Office but, instead, look at the response to

22 the first Second Sight Report?

23 **A.** Okay.

24 **Q.** Can we look, please, at POL00115919. This is the

25 briefing note to Ms Vennells again, yes, do you

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1 meeting with James Arbuthnot, I think that would have

2 been Alice, Paula, possibly Mark from the Comms Team,

3 Mark Davies, possibly. But definitely, in terms of the

4 38 --

5 **Q.** Can you speak up a bit, please.

6 **A.** Sorry, definitely in terms of the 38, in terms of the

7 comms strategy. I don't know, my recollection of the

8 early days of the conversations we had -- so it would

9 have been Alice, Paula, Susan, Lesley Sewell would have

10 been in at the start as well and Simon Baker and myself,

11 would have been early conversations. But as in terms of

12 driving this through, I'm really -- I can't recall

13 exactly who -- we had our areas of responsibility.

14 **Q.** So Plan A was to try to persuade Mr Arbuthnot to

15 postpone a meeting with Second Sight; Plan B was to

16 prepare what's described as a full communication

17 strategy with rebuttal and tactics in line with

18 an approach aimed to minimise reputational impact on the

19 Post Office, yes?

20 **A.** Mm-hm.

21 **Q.** Was that the strategy that was in fact adopted: rebuttal

22 and tactics aimed to minimise reputational impact?

23 **A.** I think, in terms of the reputational impact, because

24 the feeling was, with Second Sight, at this point, that

25 they weren't evidencing quite a bit of what they were

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1 claiming. So I think --

2 **Q.** Who was saying that they weren't evidencing what they

3 were claiming?

4 **A.** Sorry?

5 **Q.** Who was saying they were not evidencing what they were

6 claiming?

7 **A.** So that was in terms of looking at what they were

8 saying, they hadn't -- so if I just -- so this is the

9 interim report, isn't it? This is the 8 July Interim

10 Report.

11 **Q.** Yeah.

12 **A.** So, prior to this, there were 47 cases that were really

13 feeding into this, and that's through the Spot Reviews.

14 By the time we got to the Interim Report, if I remember

15 correctly, there were only four Spot Reviews that Second

16 Sight were speaking to and my memory of that is not one

17 of those four cases has actually been concluded. So

18 there wasn't an absolute outcome and I think that's what

19 was driving, you know -- and it was a collective view.

20 I'm not saying anybody -- it was a collective view that

21 there's an issue being raised or an allegation being

22 made. There's some investigation work being done but,

23 actually, they've not concluded that yet.

24 **Q.** The Interim Report at least highlighted problems with

25 Horizon, didn't it, including the two anomalies as they

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1 **A.** Yeah.

2 **Q.** Why was that the plan?

3 **A.** I think it was because -- and my early recollection of

4 before we engaged Second Sight, I remember being in some

5 of the early conversations about what we should do, in

6 terms of approach and, at that point, it was kind of one

7 of the big four. But that was dismissed in terms of

8 preference going with Second Sight, and I --

9 **Q.** Why was the preference for Second Sight before they'd

10 done their work?

11 **A.** Sorry, why did we go with Second Sight?

12 **Q.** Yes, before they'd started their work, what made you go

13 with them?

14 **A.** I'm not exactly sure. My take would be that that would

15 have been less costly than getting one of the big four

16 in. But, also, I think around addressing some of the

17 other issues that were being claimed, that would be

18 outside of the Horizon system itself, because, as you've

19 seen, the focus or the scope expanded when Second Sight

20 got going and said, "We have to expand the scope", which

21 is what we went with.

22 **Q.** Why, after the independent reviewers had produced their

23 independent report, was consideration being given to

24 replacing them?

25 **A.** From my view, that was simply around cost and lack of

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1 were described?

2 **A.** Yes.

3 **Q.** In fact, a third as well. Was there any consideration

4 given within Post Office: should we look deeper into

5 Horizon to see if there are any other problems with it?

6 **A.** I don't think there was.

7 **Q.** Was, instead, the first priority to be damage limitation

8 and reputational management?

9 **A.** I don't think it was as stark as that. I think --

10 **Q.** Protect the brand at all costs?

11 **A.** No, that wasn't my sense at the time. My sense was:

12 this was the -- this was the precursor to the scheme.

13 We had done -- this was almost a -- well, it was a year

14 on from when Second Sight had been engaged and we'd had

15 an awful lot of effort put into the investigations but

16 we had very little output. So this was about the fact

17 that the rebuttal would be in as much as there's claims,

18 allegations, but they're not being substantiated with

19 the evidence because the investigations aren't

20 concluded.

21 I think that was the approach here, more than just

22 an absolute brand limitation, that wasn't the driving --

23 the driving force behind this, from my recollection.

24 **Q.** Let's get rid of the independent investigators and get

25 one of the big four involved: paragraph 40.

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1 output.

2 **Q.** So one of the big four would be cheaper than Messrs

3 Henderson and Warmington?

4 **A.** I'm not saying they'd be cheaper but I think we might

5 get to a conclusion more quickly than we were seeing at

6 this time because this was a year on and we had very

7 little output but had spent quite considerable amounts

8 of money.

9 **Q.** Or was it that they were proving to be a little too

10 independent for the Post Office?

11 **A.** Well, that certainly wasn't my take.

12 **Q.** Well, was it the take of anyone else?

13 **A.** I don't know. I mean, that certainly wasn't -- that

14 wasn't shared with me --

15 **Q.** Had anyone blamed Susan Crichton for suggesting them?

16 **A.** At the time, I didn't think so. I mean, I've obviously

17 been listening to things this week.

18 **Q.** "Susan, you've got us these people in, they're a bit too

19 independent for us, why don't we go for one of the big

20 four, whom we can manage and control"?

21 **A.** So that's not a conversation I was aware of. I do

22 remember in the early conversations Susan saying, "I do

23 know -- I know these people", and quite clearly saying

24 at the time "I'm not making any recommendations. I've

25 worked with Ron. If you want me to, I can set up

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1 a meeting and you can take your own view".

2 I do absolutely remember that conversation at the

3 start. So what you've just said about their being too

4 independent, that wasn't something I was party to in

5 terms of the conversation. I was working quite closely

6 with them at the time, particularly Ron and, yes, he was

7 very challenging, and so he should be. I mean, that's

8 what I expected them to do.

9 **Q.** Were you aware of a suggestion that Susan Crichton had

10 failed to mark Second Sight properly.

11 **A.** Not before listening to her evidence yesterday.

12 **Q.** Were you aware of chatter within the business,

13 rumblings, that Susan Crichton's job was on the line

14 because she had (a) introduced reviewers who were

15 a little too independent, and (b) when they were

16 introduced, had failed to mark them, ie control them?

17 **A.** That wasn't something I was aware of and, actually,

18 Susan leaving was quite a shock to me.

19 **Q.** Why did you think she left?

20 **A.** I suspected it was to do the fact that Second Sight

21 weren't delivering the output in the time -- in that

22 time period.

23 **Q.** So it was about the quality of Second Sight's work?

24 **A.** It was about the timeliness and the -- I won't say the

25 quality. It was the quantity --

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1 and has responded to all ten Spot Reviews.

2 "It has ..."

3 Then second bullet point from the bottom:

4 "Liaised closely with Fujitsu so that its expertise

5 on Horizon supports every response."

6 Then, lastly:

7 "Collated and interrogated transaction records where

8 Second Sight has referenced particular identifiable

9 transactions."

10 Taking those points in turn and, bearing in mind you

11 were, I think, responsible for managing the provision of

12 information to Second Sight, was it right that Post

13 Office had liaised closely with Fujitsu, so that its

14 expertise supported every response that was made.

15 **A.** That wasn't me liaising with Fujitsu.

16 **Q.** Sorry?

17 **A.** That wasn't me liaising with Fujitsu.

18 **Q.** No, I didn't ask whether you were liaising with the

19 Fujitsu. I asked: do you know whether the Post Office

20 liaised with Fujitsu to support every response?

21 **A.** My understanding was that, yes, and I think at this time

22 it was Simon Baker that was leading on that.

23 **Q.** It records, secondly, that the Post Office collated and

24 interrogated transaction records where Second Sight have

25 referenced particular identifiable transactions; did the

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1 **Q.** The speed --

2 **A.** The quantity, we weren't seeing the outputs, and --

3 **Q.** So she felt embarrassed that she had introduced Second

4 Sight and they weren't producing enough work quickly

5 enough?

6 **A.** That wasn't the impression I got from Susan.

7 **Q.** Why do you think she left?

8 **A.** Look, I mean, I've listened to her evidence this week.

9 I wasn't aware of what the conversations and what was

10 going on in the background. I knew Susan had introduced

11 Second Sight to the business. She hadn't recommended

12 them but she'd introduced them and we were in that space

13 of that was a good thing. I'd seen -- you know, I'd

14 seen the pack and they came across as being very

15 credible.

16 So I never personally thought she was ever

17 embarrassed by anything they were doing but she was

18 aware that we weren't getting the outputs that we

19 thought we would by that time.

20 **Q.** Can we turn on in the document, please, to Annex 1,

21 which provides an overview of the process, so if we move

22 through the document to page 8, please, and if we look

23 at the bottom part of this page under "Post Office's

24 Activity":

25 "It has provided continuous support to Second Sight

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1 Post Office only check transaction records?

2 **A.** For the Spot Reviews? Um, I don't think so. I think we

3 went wider. We certainly did in the Lepton -- the

4 Lepton case.

5 **Q.** Why does this say, then, that the Post Office

6 interrogated transaction records? I'm thinking in

7 particular about event records or ARQ data?

8 **A.** I'm trying to remember. So, in the Lepton case, I did

9 have a number of conversations with Ron on that one,

10 then we did actually get the ARQ information, I think.

11 It was definitely a more broader conversation because we

12 needed to get more information to understand what had

13 gone on in Lepton Branch. I can't recall. Again,

14 I think this would have been Simon facilitating this

15 from Fujitsu.

16 **Q.** Okay, were you aware of the extent to which audit data

17 had been examined by Fujitsu for all of the Spot

18 Reviews?

19 **A.** I can't say that I was.

20 **Q.** Do you know if -- why that would not have been done?

21 **A.** I don't know why it wouldn't have been done because that

22 is the approach that we adopted for the scheme, and this

23 was the precursor to the scheme, so it might very well

24 have been done but I couldn't say that I was aware

25 categorically.

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- 1 Q. I thought you were responsible for the management of the
2 provision of information to Second Sight?
- 3 A. No, I did say I -- I thought I said earlier I wasn't
4 responsible; I was facilitating the flow of information,
5 to Second Sight, but I wasn't --
- 6 Q. So it came through you?
- 7 A. Some of it did. Not all of it. But there was -- it was
8 more of a collective approach and Simon, from the IT,
9 team, because he was IT and change, was -- I think it
10 was Simon that was liaising with Fujitsu. Our contact
11 at the time was, I think, Pete Newsome who was the
12 account manager from Fujitsu facing into Post Office.
- 13 Q. If, as seems to be the case, the Post Office was utterly
14 convinced that its system was robust, would there be any
15 reason not to interrogate all of the data held by
16 Fujitsu?
- 17 A. Sorry, can you repeat that question?
- 18 Q. Yes. If, as seems to be the case, the Post Office was
19 completely convinced in the integrity of its system, the
20 robustness of its system, would there be any reason not
21 to investigate all of the data that Fujitsu held in
22 relation to all of the Spot Reviews?
- 23 A. So I would have expected it to have been investigated.
- 24 Q. The ARQ data, enhanced ARQ data?
- 25 A. I'm not sure about the enhanced ARQ data at the time but

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- 1 Q. -- to bring things under the Post Office's control and
2 then remove Second Sight from the process completely?
- 3 A. So I've seen some information disclosed. From memory,
4 that certainly wasn't at the front of my mind, other
5 than, if we were to go into a business as usual
6 situation because, having established an approach, and
7 I'm talking more about scheme, I very much was of the
8 view that we needed to embed that into business as usual
9 so that we did have the support to be able to
10 investigate issues within branches that a subpostmaster
11 raised with us.
- 12 But, in terms of mid-scheme, I mean, yes, I was
13 involved in some of the conversations, but I never saw
14 that -- I'm not sure I ever saw it as a reality, to be
15 honest.
- 16 Q. You were aware ever of a plan gently to ease Second
17 Sight out of the equation?
- 18 A. I mean, I've said documents that have said that but that
19 wasn't in the fore of my mind at all. I mean, I was
20 working very closely with Second Sight on these cases.
- 21 Q. Can we look, please, at POL00381544. This is an email
22 exchange to which you weren't party. It's a couple of
23 weeks after what we've been looking at just now, and
24 it's an email exchange between Mr Baker and Ms Vennells.
25 He was leaving, yes?

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- 1 definitely the standard ARQ --
- 2 Q. Why are you not sure that the enhanced ARQ data would
3 have been the subject of examination?
- 4 A. I don't know what they would have requested.
- 5 Q. Who's "they"?
- 6 A. Again, it would have been -- I think it was Simon Baker,
7 in terms of liaison directly with Fujitsu.
- 8 Q. But these paragraphs here are intended to give comfort,
9 aren't they, to Ms Vennells, that Fujitsu have been
10 closely involved and data has been obtained which backs
11 up the Post Office's response to Second Sight?
- 12 A. Yes, I agree.
- 13 Q. How could this have been signed off, then, without
14 a full understanding of the extent to which Fujitsu did,
15 in fact, assist the Post Office in the investigation of
16 Spot Reviews?
- 17 A. And that might have been the case. All I'm saying is
18 I wasn't directly involved in that and I'm not sure --
19 I can't recall that that absolutely was the case but it
20 very well might have been.
- 21 Q. Thank you. That can come down.
22 Can you remember a plan to ensure that the Post
23 Office took on the role of investigating cases raised by
24 its subpostmasters, rather than Second Sight --
- 25 A. No.

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- 1 A. Yes, and I wasn't sure of the timeline but I can see
2 this would have been close to it, yeah.
- 3 Q. "A few closing thoughts, here they are, nothing
4 radical."
5 His first indented paragraph:
6 "The primary focus has to be proving to JFSA and MPs
7 that we can take on the role of independently
8 investigating cases."
9 Just stopping there, can you conceive of any
10 circumstances in which the Post Office could ever
11 independently investigate itself?
- 12 A. No.
- 13 Q. The subpostmasters were making allegations against the
14 Post Office, weren't they?
- 15 A. Yes.
- 16 Q. The subpostmasters were making allegations against the
17 Post Office's system, weren't they?
- 18 A. Yes.
- 19 Q. The Post Office could never independently investigate
20 them, could it?
- 21 A. No.
- 22 Q. If you'd seen this, would you think that's just absurd
23 babble?
- 24 A. So when I saw that for the first time, which I think was
25 this week, I was amazed at the content.

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1 Q. He continued:
 2 "That way we can start to bring things under our
 3 control."
 4 That was always the plan, wasn't it? A concern
 5 amongst senior leadership, it was a bad thing if
 6 investigation of complaints were not under the Post
 7 Office's control?
 8 A. So that wasn't my take on -- so when I got involved at
 9 the start and the early conversations, it was about
 10 genuinely getting to the truth, getting under the skin
 11 and understanding whether there was any substance to the
 12 claims that were being made by mostly former postmasters
 13 at the time.
 14 So, you know, this is, as I said, I find this
 15 quite -- found this quite amazing -- you know, I'm
 16 startled by what I've seen in here and that wasn't why
 17 I'd voluntarily got involved because I did step into
 18 this of my own volition.
 19 Q. Was the Post Office's concern that "If things are not
 20 under our control and are instead a little too
 21 independent, we can't influence the outcomes of them"?
 22 A. Well, again, from the disclosure that I've seen then
 23 I can see that, but I wasn't a party to those
 24 conversations. You know, I genuinely believed, when we
 25 engaged Second Sight, I was -- it was for genuine
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1 which ones, where it was reported about concern about
 2 Second Sight rising cost, not getting the outputs, and
 3 there were some alternatives being mooted about, you
 4 know, bringing in some additional resource. But it's
 5 only through the disclosure process I've seen the extent
 6 of some of those conversations.
 7 Q. Was the concern that they were a little too independent
 8 for the Post Office?
 9 A. I didn't think so. As I've said, it was about the level
 10 of output and the cost. I didn't think it was about the
 11 independence because I was part of the Working Group and
 12 they were clearly -- their role was to be independent
 13 and that's how we operated.
 14 Q. According to Mr Baker, the strategy was going to fall on
 15 you. You were seemingly in charge of easing Second
 16 Sight into the wings and then out of the equation. Were
 17 you ever told that you held that role?
 18 A. No. I've said this was a complete shock when I saw
 19 this.
 20 Q. Did you ever do anything to carry that strategy into
 21 effect?
 22 A. I don't think so. I mean, I was there to investigate
 23 the issues from postmasters. I mean, again, overlap
 24 with the initial Inquiry for the Spot Reviews and then
 25 going into the scheme, my role was to lead the team to
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1 reasons. But I think we didn't expect it to have gone
 2 on as long as it did. But, saying that, the cases were
 3 much more complex to investigate than, I think, anybody
 4 anticipated at the start. I'm sorry I'm probably
 5 drifting a little bit more into the scheme here.
 6 Q. Is the concern was "We want control over the process
 7 and, in that way, we can have control over the substance
 8 of conclusions"?
 9 A. Again, that wasn't my view.
 10 Q. The suggestion is that the plan to do this is to augment
 11 Second Sight with Post Office resources, build up our
 12 credibility and then at the right time, remove Second
 13 Sight; that's what happened, isn't it?
 14 A. In terms of -- are you referring to what, closing the
 15 scheme? Again, all I can say, I wasn't aware that this
 16 was the plan.
 17 Q. It was the early plan, according to this?
 18 A. Well, I wasn't part of that conversation.
 19 Q. If we look at the next paragraph, the strategy was said
 20 to fall almost entirely upon your shoulders?
 21 A. That certainly wasn't what I was aware of.
 22 Q. At this time, which is the end of August, did you know
 23 that it was the Post Office's plan to remove Second
 24 Sight?
 25 A. I mean, I'd been in some meetings, I can't remember
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1 do those investigations as thoroughly as we could. In
 2 the initial Inquiry with the Spot Reviews, I only had
 3 a couple of people doing that and then we built then
 4 obviously going into the scheme.
 5 Q. You'd worked very closely with Mr Baker, hadn't you?
 6 A. No.
 7 Q. No?
 8 A. Not before getting involved with this, no.
 9 Q. No, I'm talking about in this, in the Second Sight --
 10 A. Oh, sorry.
 11 Q. -- investigations. You told us already that he was
 12 responsible for --
 13 A. Yes.
 14 Q. -- the IT side but about of the provision of
 15 information --
 16 A. So the first time I met Simon Baker was when we were
 17 having the early conversations, which would have been in
 18 2012, throughout that period, which would have been
 19 about a year, if he left in August, then I did work
 20 quite closely with him at that point.
 21 Q. So for a year or so you'd worked closely with him on the
 22 Second Sight project?
 23 A. Yes.
 24 Q. Do you know how it was that he seems to have held the
 25 view that the focus had to be to bring things under the
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1 Post Office's control and then, at the right time,
 2 remove Second Sight without having told you of it?
 3 **A.** I don't -- I mean, Simon was having lots of
 4 conversations with Paula and, I presume, Alice. He was
 5 working to Lesley Sewell at the time. I can't remember
 6 when Lesley left either. But that's certainly not
 7 a conversation he had with me.
 8 **Q.** Ultimately, the Post Office did remove Second Sight?
 9 **A.** Once we'd completed the investigations into the scheme
 10 cases, yeah.
 11 **Q.** Are you saying that was unrelated to the plan that's
 12 described here?
 13 **A.** As far as I was concerned, yes. But, again, I hadn't
 14 seen this.
 15 **Q.** It's a bit like the email of 5 December, it comes as
 16 a bit of a shock to you?
 17 **A.** No, it's different. I mean that 5 December was sent to
 18 me; I just hadn't read it. This was never sent to me,
 19 I don't believe, because I've definitely never seen
 20 this, and this, I think, is a note from -- a private
 21 note from Simon to Paula. So this is different
 22 altogether.
 23 **Q.** Thank you. That can come down.
 24 To your mind, did the Second Sight Interim Report of
 25 8 July 2013 raise concerns over the integrity of
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1 prosecuted very many people in the past, based on the
 2 Horizon evidence?
 3 **A.** I wouldn't say very many. I was aware of some.
 4 **Q.** What was your impression of how many people the Post
 5 Office had prosecuted in the last, say, 13 and a half
 6 years?
 7 **A.** I'm not sure, at that point, I had a number. Clearly,
 8 I've seen the number since but my early recollection is
 9 that I wouldn't have been aware of the number of cases
 10 at a national level. It would only have been the ones
 11 that I would have been involved in or close to.
 12 **Q.** Even if it was some cases, you would have been aware
 13 that the information in the Second Sight Report and the
 14 revelation of the bugs may have impacted on those
 15 prosecutions?
 16 **A.** As I said earlier, I wasn't close to the conviction, you
 17 know, the process for the convictions, and --
 18 **Q.** Can you help us what you did do? So far today you've
 19 said you weren't close to many things.
 20 **A.** No, I've said the prosecutions -- I was not involved in
 21 the prosecutions.
 22 **Q.** Not involved in briefing; not involved in IT; not
 23 involved in the provision of information concerning
 24 Horizon to Second Sight; not involved in investigating
 25 those early complaints about Horizon that I raised; not
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1 Horizon?
 2 **A.** I think, going back to my earlier comment, is that there
 3 were allegations and issues being raised, without it
 4 being supported with the evidence. So, in that respect,
 5 it wasn't conclusive but it did raise concerns at that
 6 point.
 7 **Q.** Concerns that needed to be investigated?
 8 **A.** Yes.
 9 **Q.** It raised the existence of three bugs that had operated
 10 in the past?
 11 **A.** Well, we disclosed the bugs to them, so, in that respect
 12 it gave -- I suppose what it did do is it brought -- it
 13 made it public.
 14 **Q.** On that, do you know who disclosed the bugs to them?
 15 Quite a few people are claiming credit for disclosing
 16 the bugs.
 17 **A.** So my understanding was it was Simon Baker who provided
 18 the information to Second Sight but I've seen other
 19 things that say that that's different. But my
 20 recollection, from the time, was that's how it was.
 21 **Q.** So there was some credit for Post Office there, because
 22 this was voluntary disclosure without pressure from
 23 Second Sight; is that right?
 24 **A.** I presume so.
 25 **Q.** You were aware, at this time, that the Post Office had
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1 involved in considering the impact of the Second Sight
 2 Report on convictions.
 3 What were you doing at this time?
 4 **A.** So I was -- well, I had a separate role as well. So
 5 I was doing whatever my business as usual role was and
 6 then I was working closely on -- at this point, on the
 7 Spot Reviews with Second Sight.
 8 **Q.** Did anyone say to you, "We might have a problem here.
 9 Some of our prosecutions have been based on Horizon data
 10 and that data may not enjoy the integrity that we
 11 thought it did, sufficient for criminal court purposes.
 12 Something needs to be done about that"?
 13 **A.** So my understanding of how the cases that had been
 14 prosecuted, the conviction -- you know, the cases that
 15 had gone to court -- was that they had been properly
 16 investigated at the time.
 17 **Q.** Where did you get that understanding from, that the
 18 cases resulting in conviction had been properly
 19 investigated?
 20 **A.** That was my general understanding of the approach to
 21 prosecutions. So there was my understanding --
 22 **Q.** Where did you get that understanding from?
 23 **A.** I must have asked somebody because I'd never seen
 24 a policy on there but my understanding, from just
 25 growing up in the business, as it were, is that the
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1 process was quite rigorous, in -- it was investigated by
 2 the Security and Investigation Team, it had oversight
 3 from our internal Legal Team, and it would have been
 4 Royal Mail in the early days. Any case that was being
 5 put forward had external legal advice on it, as well,
 6 and then it came back in to the Post Office to get
 7 General Counsel's sign-off. So --
 8 **Q.** Where do you get that, in some respects, faulty
 9 understanding from?
 10 **A.** I'd been speaking to people. I mean, as we went through
 11 the -- and I can't remember the exact timeline but, as
 12 we went through the process, I remember having
 13 a conversation with Rod, Rodric Williams, to say -- and
 14 particularly when I found out about Gareth Jenkins --
 15 and that's probably later, but -- and I remember saying
 16 to him, "So what's the impact then?" and his view -- his
 17 response to me was, "Oh, it's fine, we've got a QC
 18 looking at -- or we have had looking -- so they've
 19 looked at the implications on the past convictions".
 20 So, for me, then I'd satisfied myself that that was
 21 in hand and, you know, that was outside my area of scope
 22 or knowledge, and I took it at face value from the Legal
 23 Team.
 24 **Q.** You said there when you became aware of the issue
 25 relating to Gareth Jenkins?
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1 **A.** Because I'd asked.
 2 **Q.** Why had you asked?
 3 **A.** Because it didn't sound -- well, the normal run of the
 4 course, that we had been using a witness in cases and
 5 we, at that point, were still prosecuting and there were
 6 still cases going forward but we were no longer using
 7 the witness that we had used previously. So I wanted to
 8 understand why that was.
 9 **Q.** What had it got to do with you?
 10 **A.** Because I was concerned at that point.
 11 **Q.** So you were concerned with the Post Office's prosecution
 12 practices?
 13 **A.** I was concerned about the fact that why would we not be
 14 using a witness that we had been using previously? So
 15 there was something not quite right about that and
 16 I asked the question, and I probably didn't probe deep
 17 enough, but I got a response that satisfied me, in terms
 18 of my knowledge, that we'd had a QC look at that,
 19 assess, and the verdict was that was -- everything was
 20 okay.
 21 **Q.** Can we look, please, at POL00006375 -- that's the wrong
 22 reference. If you forgive me a moment, Ms van den
 23 Bogerd.
 24 **A.** Okay.
 25 (Pause)
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1 **A.** Yes.
 2 **Q.** What was the issue that you became aware of?
 3 **A.** So it was that Gareth -- we wouldn't be using Gareth in
 4 any cases going forward and --
 5 **Q.** Were you told why?
 6 **A.** Not to the extent that I've seen now.
 7 **Q.** What were you told as to why you'd stopped using him?
 8 **A.** So again, I'd asked Rod and he said, "Oh, there was
 9 an issue with some of the evidence".
 10 **Q.** This is Rod Williams?
 11 **A.** Sorry, Rodric Williams, and I worked quite closely with
 12 Rodric Williams throughout all of the spot review and
 13 into the scheme and then the GLO. His response to me
 14 was that, "There was an issue with the evidence he'd
 15 given, we've had a QC [as it was at the time] look at
 16 that and there's no issue. It's all been looked at,
 17 there's no issue, but we won't be using him as a witness
 18 going forward".
 19 **Q.** So there's no issue --
 20 **A.** In respect of the cases, the past cases.
 21 **Q.** What did you understand to be meant by "There is no
 22 issue"?
 23 **A.** That they were safe, the convictions were safe. They
 24 didn't need to be reopened.
 25 **Q.** Why were you being told this?
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1 **Q.** Whilst Mr Blake helps me on that, were you provided with
 2 a copy of an advice written by a barrister called Simon
 3 Clarke concerning Gareth Jenkins?
 4 **A.** No.
 5 **Q.** When was the first time that you saw that?
 6 **A.** In this pack, the disclosure pack.
 7 **Q.** So in the last few weeks?
 8 **A.** Yes.
 9 **Q.** What did you think when you read it?
 10 **A.** Well, it certainly filled more gaps, you know, in terms
 11 of the reason why and it certainly had more significance
 12 than what I recalled had been relayed to me.
 13 **Q.** Why was it more significant than had been relayed to
 14 you?
 15 **A.** Because -- and I'm not familiar with all the language
 16 used in there but because it had implications on the
 17 cases and that he had breached his code -- his duty to
 18 the court. I'm sorry, I'm not familiar with the
 19 terminology but that was, you know, very significant in
 20 terms of what I read.
 21 **Q.** POL00006357. I think that's what I called out. Ah,
 22 perfect. Thank you.
 23 If we just look at the last page of this, please, we
 24 can see it's dated 15 July 2013.
 25 **A.** Yes.
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1 Q. If we go back to paragraph 37, which is up a couple of
 2 pages, I think:
 3 "What does all this mean? In short it means ..."
 4 I'm going to insert the right words here:
 5 "... [Gareth Jenkins] has not complied with his
 6 duties to the court, the prosecution or the defence.
 7 "38. The reasons as to why [Gareth Jenkins] failed
 8 to comply with this duty are beyond the scope of this
 9 review. The effects of the failure must be considered.
 10 I advise the following to be the position:
 11 "[Gareth Jenkins] failed to disclose material known
 12 to him but which undermines his expert opinion. The
 13 failure is in plain breach of his duty as an expert
 14 witness.
 15 "Accordingly, [Gareth Jenkins'] credibility as
 16 an expert witness is fatally undermined; he should not
 17 be asked to provide expert evidence in any current or
 18 future prosecution.
 19 "Similarly, in those current and ongoing cases where
 20 [Gareth Jenkins] has provided an expert witness
 21 statement, he should not be called upon to give that
 22 evidence. Rather we should seek a different,
 23 independent expert ...
 24 "Notwithstanding that the failure is that of [Gareth
 25 Jenkins] and, arguably, of Fujitsu ... this failure has
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1 A. It all concerned me concern because, when I asked the
 2 question, that wasn't the response that I got.
 3 Q. What is said here is not consistent with the assurance
 4 that you got, is it?
 5 A. No, it's not.
 6 SIR WYN WILLIAMS: So I'm clear about it, this assurance,
 7 from whom did that come?
 8 A. It was from a conversation I had with Rodric Williams.
 9 I can't --
 10 SIR WYN WILLIAMS: That conversation, in the context of how
 11 this advice should be dealt with, if at all, in the
 12 disclosure to Second Sight?
 13 A. So I wasn't aware of this advice at the time and, as
 14 I said, I've only just seen this document. The
 15 conversation I had with Rodric was about -- and I don't
 16 know exactly when it was but it was at the point at
 17 which I learnt that we were no longer going to -- we
 18 couldn't use Gareth Jenkins as a witness in future
 19 cases, and it was at that point I'd asked Rodric, "Well,
 20 why and what does that mean?" and that's the response
 21 I got from Rodric. But, as I say, I don't remember the
 22 time but I certainly had not seen this advice.
 23 MR BEER: Do you think, looking at the conclusions that were
 24 reached in this advice, you ought to have been told
 25 about it?
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1 a profound effect upon Post Office and its prosecutions,
 2 not least by reason of [Gareth Jenkins'] failure,
 3 material which should have been disclosed to the
 4 defendants was not disclosed, thereby placing the Post
 5 Office in breach of their duties as a prosecutor.
 6 "By reason of the failure to disclose, there are
 7 a number of now convicted defendants to whom the
 8 existence of bugs should have been disclosed but was
 9 not. Those defendants remain entitled to have
 10 disclosure of that material notwithstanding their
 11 convicted status. (I have already advised on the need
 12 to conduct a review of all Post Office prosecutions.
 13 That review is presently under way.)
 14 "There are a number of current cases where there has
 15 been no disclosure where there ought to have been. Here
 16 we must disclose the existence of the bugs to those
 17 defendants where the test for disclosure is met.
 18 "Where a convicted defendant or his lawyers consider
 19 that the failure to disclose material reveals
 20 an arguable ground of appeal, he may seek the leave of
 21 the Court of Appeal to challenge his conviction."
 22 Was it reading those paragraphs, in particular, that
 23 caused you concern when you got this recently?
 24 A. It all caused me concern, actually, but --
 25 Q. Sorry?
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1 A. Yes, I do.
 2 Q. Is that because of the role that you were then
 3 performing?
 4 A. Well, this -- I mean, in July we were moving into the
 5 scheme. So we launched the Mediation Scheme in the
 6 August and there were discussions in the Working Group
 7 about the safety of the prosecutions, the cases, and,
 8 again, I still wasn't brought into this detail at all.
 9 Q. The Inquiry has got evidence that the advice that we're
 10 looking at was sent to Martin Smith of Cartwright
 11 King --
 12 A. Okay.
 13 Q. -- to Susan Crichton, the then General Counsel --
 14 A. Okay.
 15 Q. -- to Rodric Williams; to Hugh Flemington; to Andrew
 16 Parsons; to Simon Richardson; to Jarnail Singh; and to
 17 Gavin Matthews. Did any of those people draw its
 18 conclusions to your attention?
 19 A. No.
 20 Q. Did any one of them --
 21 A. Sorry, there's two on that list I don't know: the Gavin
 22 and the -- sorry, the last --
 23 Q. Gavin Matthews?
 24 A. I don't recall that name at all.
 25 Q. Yes.
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1 A. And not the next one up, but the one up above that.
 2 Q. Andrew Parsons, you knew --
 3 A. No, I knew Andrew Parsons.
 4 Q. Simon Richardson?
 5 A. Didn't know Simon Richardson. Everyone else I was aware
 6 of but, no, I did not have this information brought to
 7 my attention.
 8 Q. You, I think, carried on having extensive dealings with
 9 Andrew Parsons over the years?
 10 A. Yes.
 11 Q. Right up until 2020?
 12 A. Yes.
 13 Q. And not a thing was mentioned by him about this --
 14 A. No.
 15 Q. -- about the reasons why the Post Office had to sack
 16 Gareth Jenkins?
 17 A. Well, I don't think the Post Office actually sacked --
 18 well, he worked for Fujitsu anyway, but Gareth
 19 Jenkins --
 20 Q. "Sack him" is shorthand: stop using him as a witness in
 21 any of its cases?
 22 A. So I didn't have that -- I don't think I had that
 23 conversation with Andy Parsons but we did use Gareth
 24 Jenkins in the GLO. You know --
 25 Q. You're ahead of me again, Ms van den Bogerd.

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1 Office had given an instruction to destroy or to shred
 2 evidence and not to write anything down in order to
 3 avoid disclosure duties to the court?
 4 A. I wasn't when I was -- I wasn't -- I've seen it as part
 5 of the disclosure pack. I wasn't aware that we'd had
 6 advice. I was aware of the shredding situation but
 7 I wasn't aware that the advice had been given.
 8 Q. Okay, what were you aware about the shredding situation?
 9 A. So my recollection -- and I'm sorry, I'm struggling with
 10 some of the times here. So Gayle Peacock, who was
 11 working with me at the time, had been attending the
 12 Horizon -- I think it was a weekly call or meeting.
 13 Q. So a weekly Wednesday hub?
 14 A. Something -- yeah, I can't remember the exact details.
 15 I never was involved in those meetings. But Gayle
 16 Peacock, who was either -- because Gayle worked for me
 17 in the Branch Support Programme, I think it was around
 18 that time, and she mentioned to me that John Scott had
 19 given this instruction.
 20 Q. Did she say how she knew that it was John Scott who'd
 21 given the instruction?
 22 A. She said it was John Scott.
 23 Q. Yes. Did she say how she knew that it was John Scott?
 24 Was she giving you the impression that he had given the
 25 instruction to her?

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1 A. Sorry, apologies.
 2 Q. In that context, did anyone say, including Mr Parsons,
 3 "Hold on, we've been advised [this is my summary, not
 4 theirs] that Mr Jenkins is a tainted witness whose
 5 reliability has been found, on advice, to be
 6 compromised, therefore we can't use him in any
 7 capacity"?
 8 A. No, not that I remember, and the words "tainted" --
 9 that, you know -- as I said, my recollection of my
 10 conversation with Rodric -- and it was Rodric, and I
 11 don't believe I had a conversation with Andy because
 12 I wouldn't have raised it because I had had a response
 13 from Rodric was that there was an issue with his
 14 evidence and therefore we are -- we can no longer use
 15 him as a witness, which is very different to what you
 16 just said.
 17 Q. The advice can come down from the screen.
 18 "Tainted", incidentally, was a word used by the QC
 19 you ask that you mentioned, Brian Altman KC. That
 20 expression was never used, even in the context of the
 21 GLO and the assistance that Mr Jenkins was providing in
 22 the GLO.
 23 A. Not that I can remember.
 24 Q. Were you aware of a further advice written by Mr Clarke
 25 dealing with the suggestion that a member of the Post

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1 A. I'm not -- I can't remember but she said to me John
 2 Scott. Now, whether he was in the meeting or not,
 3 I don't know because, as I said, I wasn't in the meeting
 4 but it was a case of John Scott had given this
 5 instruction and just disbelief, if I'm honest, about
 6 that.
 7 Q. What was your understanding as to what was done about
 8 the shredding instruction given by the Head of Security?
 9 A. My understanding was that Susan Crichton intervened and,
 10 you know, put a message out that that clearly should not
 11 happen. Not that I ever think -- I don't even know
 12 whether anybody ever did destroy anything because I'm
 13 sure Gayle wouldn't have at the time, so -- but Susan
 14 intervened and put that straight, was my recollection of
 15 it.
 16 MR BEER: Sir, thank you. That is a convenient moment to
 17 break, if it's convenient for you, until I think 10.00
 18 tomorrow morning.
 19 SIR WYN WILLIAMS: Well, I think you may know, Mr Beer, that
 20 my assessors and I will be there tomorrow in the hearing
 21 room.
 22 MR BEER: Yes.
 23 SIR WYN WILLIAMS: We, I think, can leave it at 9.45 but, to
 24 a small extent, there is, of course, a risk that the
 25 train from South Wales may be late. But I think we'll

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1 leave it at 9.45. If the worst happens, you'll just
 2 have to wait for me for a few minutes, but, if it's on
 3 time, we'll be on time.
 4 **MR BEER:** Thank you very much, sir, 9.45 then. Thank you.
 5 **SIR WYN WILLIAMS:** Before I break, Ms van den Bogerd, it is
 6 customary for me to tell witnesses who are adjourned
 7 overnight that they shouldn't speak about their
 8 evidence.
 9 I've no doubt you've heard that before.
 10 **THE WITNESS:** Yes, sir.
 11 **SIR WYN WILLIAMS:** No doubt you don't want to speak about
 12 your evidence, so please comply with that request.
 13 **THE WITNESS:** I will. Thank you.
 14 **MR BEER:** Thank you, sir.
 15 **(4.14 pm)**
 16 **(The hearing adjourned until 9.45 am the following day)**

I N D E X

ANGELA MARGARET VAN DEN BOGERD (affirmed) . 1
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