

Friday, 3 May 2024

1
2 (9.44 am)
3 **MR BEER:** Good morning, sir. Can you see and hear us?
4 **SIR WYN WILLIAMS:** Yes, thank you very much.
5 **MR BEER:** Can I recall Jarnail Singh, please.
6 **SIR WYN WILLIAMS:** Two things, Mr Beer. Does Mr Singh need
7 to be resworn? I take it that he does.
8 **MR BEER:** Yes, I think so because I think last time you
9 released him, essentially, from the prohibition and,
10 therefore, it would be better that he be resworn.
11 **SIR WYN WILLIAMS:** All right, well, let's deal with that
12 first then, please.
13 **JARNAIL SINGH (resworn)**
14 **Questioned by MR BEER**
15 **MR BEER:** Please do take a seat, Mr Singh.
16 **SIR WYN WILLIAMS:** I take it there's one other matter that
17 I should deal with, Mr Beer.
18 Mr Singh, on the last occasion, I hope you will
19 remember that I gave you what's called the warning about
20 self-incrimination.
21 **A.** Yes, sir, yes.
22 **SIR WYN WILLIAMS:** I fully expect that you understand the
23 legal significance of that. Would you like me to repeat
24 that warning to you or are you content that the warning
25 I gave you last time gives you sufficient information?

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1 Am I right in thinking that you're represented here
2 either by counsel or a solicitor?
3 **A.** Yes, sir.
4 **SIR WYN WILLIAMS:** Then, if the issue relating to
5 self-incrimination arises, they will assist you, if you
6 wish and, if, at any stage, during the questioning you
7 wish to consult your lawyer about the privilege, you
8 must tell me so that I can consider whether that is
9 appropriate.
10 **A.** Thank you, sir.
11 **SIR WYN WILLIAMS:** Thank you very much, Mr Singh.
12 Over to you, Mr Beer.
13 **MR BEER:** Thank you, sir. Before I begin to ask questions
14 can I apologise for the state of my voice and if it
15 breaks at any stage. I've got the flu and so if
16 I become inaudible at any time or go into a sneezing
17 fit, that's the reason.
18 **SIR WYN WILLIAMS:** Yes. Pay some attention to the state of
19 your health as well, Mr Beer.
20 **MR BEER:** Will do, sir.
21 Mr Singh, thank you very much for returning to give
22 evidence to the Inquiry today. You've kindly, in the
23 interim, made an additional witness statement. Can we
24 turn that up, please. It's WITN04750200 and you should
25 have the hard copy in front of you.

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1 **A.** I'm entirely in your hands. If you want to give it
2 I don't mind, or if you don't want to, that's fine as
3 well.
4 **SIR WYN WILLIAMS:** All right. Well, I think out of
5 an excess of caution I will repeat it, since it's some
6 months since you gave evidence.
7 As you probably know, Mr Singh, under our law,
8 a witness at public inquiry has the right to decline to
9 answer a question put to him by any of the lawyers, or,
10 for that matter me, who are asking questions. This
11 legal principle is known in shorthand form as the
12 privilege against self-incrimination. I consider,
13 Mr Singh, that fairness demands that I remind you of
14 that principle before you resume your evidence.
15 However, I should make it clear that it is for you to
16 tell me, in respect of any question put to you, if it is
17 your wish to rely upon the privilege.
18 If, therefore, any questions are put to you by any
19 of the lawyers who ask you questions, or by me, which
20 you do not understand wish to answer on the grounds that
21 to answer might incriminate you, you must tell me
22 immediately after such question is put. At that point,
23 I will consider your objection to answering the question
24 and, thereafter, rule upon whether your objection should
25 be upheld.

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1 It's 42 pages long. If you turn to the 42nd page,
2 is that your signature?
3 **A.** Oh, sorry, is -- oh, statement 2, sorry.
4 **Q.** Yeah.
5 **A.** Yes, yes, it is.
6 **Q.** Are the contents of that true to the best of your
7 knowledge and belief?
8 **A.** Yes.
9 **Q.** Thank you. You can put that to one side, the witness
10 statement can come down. There's one aspect of your
11 professional background that I didn't address on the
12 last occasion and I should now and it concerns your
13 knowledge and experience of Scottish law. Can you
14 confirm that you're not qualified in Scots Law?
15 **A.** No, I'm not, sir.
16 **Q.** So far as you're aware, was anyone else in the Royal
17 Mail Group Legal Team or, when it became Post Office
18 Legal team, Post Office Legal Team, qualified in Scots
19 Law?
20 **A.** I'm not sure.
21 **Q.** Thank you very much. Can I turn, then, to the substance
22 of the questions I want to ask you today. The first
23 concerns whether there was cover-up by the Post Office.
24 Were you, Mr Singh, involved, from July 2013
25 onwards, in a cover-up of your own prior knowledge and

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1 the Post Office's prior knowledge of the existence of
 2 bugs, errors and defects in Horizon?
 3 **A.** No, sir.
 4 **Q.** Specifically, did you, in fact, have knowledge before
 5 July 2013 of the existence of bugs, errors and defects
 6 in Horizon?
 7 **A.** Not to my knowledge, no.
 8 **Q.** But you sought to cover up that knowledge because you
 9 knew that it ought to have been disclosed in criminal
 10 proceedings but had not been disclosed?
 11 **A.** No, sir.
 12 **Q.** Specifically, did you know that others in the Post
 13 Office knew about the existence of bugs, errors and
 14 defects before July 2013 but sought to cover up that
 15 knowledge because you knew that that knowledge ought to
 16 have been disclosed into criminal proceedings but had
 17 not?
 18 **A.** Not to my knowledge, sir.
 19 **Q.** Did you specifically pretend that the first you and the
 20 Post Office knew about such bugs, errors and defects was
 21 when they were revealed by the Second Sight Report of
 22 8 July 2013?
 23 **A.** No, not to my knowledge, no.
 24 **Q.** I'm going to begin this topic by looking at what you
 25 have said over time about your knowledge of bugs, errors

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1 until a year after its first occurrence in 2011. Then
 2 6.10:
 3 "POL has informed us that it has disclosed, in
 4 witness statements to English courts, information about
 5 one other subsequently-corrected defect or 'bug' in the
 6 Horizon software."
 7 That's a reference to the Callendar Square or
 8 Falkirk bug.
 9 Can we look at your witness statement, please,
 10 page 15, paragraph 37. It'll come up on the screen for
 11 you. Page 15, paragraph 37. You say:
 12 "I do not recall exactly when I received the Second
 13 Sight Interim Report but upon reading it remember being
 14 concerned, both in relation to its findings around bugs
 15 but also the comments about training", et cetera.
 16 So you remember receiving it, reading it and being
 17 concerned around it's findings around bugs, yes?
 18 **A.** Yes, I read it.
 19 **Q.** Thank you. Can we turn to POL00006375. It'll come up
 20 on the screen. This is Simon Clarke's Advice of
 21 15 July, so it's a week later, seven days later, okay?
 22 This is the one concerning Gareth Jenkins. Can we turn,
 23 please, to page 10 and look at paragraph 28. In this
 24 part of his advice, Mr Clarke says, having set out the
 25 law in relation to duties of disclosure and expert

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1 and defects and then I'm going to turn to what I suggest
 2 the documents show as to your real knowledge. Can we
 3 start, please, with POL00029744. This the Second Sight
 4 Interim Report of 8 July 2013 and you're familiar with
 5 this, you tell us in your witness statement that you
 6 received a copy of this report and you read it, yes?
 7 **A.** Can you go right to the bottom of the page, please?
 8 **Q.** Yes, of course. If we scroll down. You want to go to
 9 the end of the document?
 10 **A.** Yes, please. It's sometime ago since I've seen it.
 11 **Q.** The end of the document is page 18.
 12 I was hoping to take this quite quickly, Mr Singh.
 13 You tell us in your witness statement that you received
 14 a copy of this document, you read it, and you were
 15 concerned by the contents of it.
 16 **A.** Yes, yes.
 17 **Q.** Right, good. Let's go back, then, to page 6. If we
 18 look, please, in paragraph 6.5 down to 6.10, the Second
 19 Sight Report reveals the existence of, or speaks to the
 20 existence of, three defects as they're called. In
 21 paragraph 6.5, the first defect referred to as the
 22 receipts and payments mismatch problem affecting 62
 23 branches discovered in September 2010; in 6.6 the second
 24 defect referred to the local suspense account problem
 25 and affected 14 branches; 6.7, unaware of the defect

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1 evidence, he then cites some paragraphs from the Second
 2 Sight Report that we've just looked at; can you see
 3 that?
 4 **A.** Yes.
 5 **Q.** He doesn't, in fact, cite the Callendar Square bug in
 6 paragraph 6.10 but that doesn't matter for present
 7 purposes. So he's saying, "I've now been told about,
 8 I've now got the Second Sight Interim Report and these
 9 are the bugs it's talking about".
 10 If we go down, please, to paragraph 29, he says that
 11 as well as having got the Second Sight Report, there's
 12 some other information, other sources of information:
 13 "On ... 27 June Martin Smith of Cartwright King was
 14 telephoned by [the Post Office]. There then ensued
 15 a number of conferences between Martin Smith and senior
 16 Post Office executives. The import of what Martin Smith
 17 was being told may be summarised thus: he was informed
 18 by [the Post Office] that a report commissioned from
 19 Second Sight by Post Office Limited and as yet
 20 unpublished, indicated that Horizon may not be 'bug'
 21 free. There was much speculation as to the content of
 22 the Second Sight Report. It appeared to [the Post
 23 Office] that some within the organisation had been aware
 24 of bugs affecting up to 30 offices, including some Crown
 25 Office branches."

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1 Then this:

2 "Jarnail Singh, Head of Criminal Litigation had been
3 unaware and did not know how long [the Post Office] had
4 known of the existence of the bugs nor indeed who at
5 [Post Office] had known."

6 Two things. Firstly, is what is said there in that
7 highlighted sentence accurate?

8 A. As far as I'm aware, sir, yes.

9 Q. Secondly, can you help us as to the context in which
10 Simon Clarke would have been made aware of it, ie your
11 state of knowledge and you saying that you had been
12 unaware of the existence of bugs?

13 A. The only bugs that I was aware of, the ones that were
14 mentioned in the case of *Misra*. I wasn't aware of any
15 other bugs to my knowledge.

16 Q. That's a very different thing to say, Mr Singh. You
17 just said that you were aware of a bug being raised in
18 the case of *Misra*?

19 A. Those two bugs that Mr Jenkins dealt with in his witness
20 statement, that's the only ones I'm aware of. I wasn't
21 aware of any other. My understanding was very limited
22 in the sense that I -- but apart from those two,
23 I wasn't aware of any --

24 Q. Which two bugs are you talking about?

25 A. The one mentioned in the -- the Falkirk one.

9

1 Q. -- that sentence there?

2 A. Well, yeah.

3 Q. Thank you. Can we move forward, please, POL00040194.

4 This is a document prepared by Cartwright King on
5 5 December 2013 and it summarises the process that had
6 then be undertaken by Cartwright King to review some
7 previous convictions. Can we look, please, at
8 paragraph 4 on page 1, at the foot of the page, please.
9 It says:

10 "The Second Sight Interim Report revealed that there
11 had been two known defects in the Horizon system since
12 the rolling out of the Horizon Online system from
13 January 2010. These defects impacted on 76 branches and
14 created both positive and negative discrepancies."

15 Then paragraph 5 on page 2:

16 "As a result of the Second Sight Interim Report it
17 became apparent that some of the matters raised in the
18 report might have been disclosable in criminal
19 prosecutions mounted by the Royal Mail Group and Post
20 Office, had these been known about by those considering
21 disclosure in such cases."

22 So consistently with the Simon Clarke Advice of
23 15 July 2013, this is recording the fact that it was the
24 Second Sight Interim Report that revealed the existence
25 of the two bugs, and these had not been known about by

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1 Q. The Falkirk/Callendar Square one, yes?

2 A. And the -- is it *Castleton*?

3 Q. Sorry?

4 A. *Castleton*, the civil case?

5 Q. That's the same one that was mentioned --

6 A. I don't know, sir, but those are the only ones.

7 Q. Okay, we'll call it for a single for the moment because
8 Callendar Square/Falkirk was mentioned in *Castleton*.

9 A. Okay, yeah.

10 Q. So the only one you knew about was the one that was
11 mentioned in the *Castleton* case and which was the
12 Callendar Square/Falkirk bug?

13 A. Yes.

14 Q. So this is accurate here, then: you had been unaware of
15 bugs which were summarised above there in the
16 paragraphs 6.5 to 6.8?

17 A. Yes. Certainly in the *Misra* case, there was different
18 names, issues, all sorts of things. I mean, I first --
19 first experience I had of this was in the *Misra* case.
20 I'm not aware of something that happened before or
21 after.

22 Q. Presumably, when you read this advice at the time, you
23 thought, yes, that does accurately summarise my state of
24 knowledge --

25 A. Yes.

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1 those considering disclosure in criminal cases.

2 A. I don't recollect being made aware of them.

3 Q. This is all accurate, if what you're saying is correct,
4 that you didn't know about the two other bugs, the
5 receipts and payments mismatch bug --

6 A. No.

7 Q. -- the local suspense account bug?

8 A. Not --

9 Q. They'd been --

10 A. I don't remember. I don't remember them at all.

11 Q. They'd been revealed by the Second Sight Report, yes?

12 A. These -- these matters, Second Sight Report or the
13 dealings with them, was dealt with by the working
14 groups. It wasn't something I was involved in. But,
15 certainly, from the Royal Mail prosecutions, apart from
16 the *Misra* case, there was no case that I dealt with or
17 I was made aware of by the Head of Criminal Law of any
18 other. Certainly even the disclosure was dealt with by
19 the Head of Criminal Law and I wasn't made aware of
20 that.

21 Q. So this is accurate, the two bugs were not known about
22 by you and you were a person considering disclosure in
23 some of the previous cases; you had conduct of them?

24 A. Well, I think my evidence from last time was that the
25 disclosure was dealt with by the Head of Criminal Law at

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1 that time because I was away for September, September
2 2010.

3 **Q.** I'm not going to go over that particular old ground
4 again.

5 **A.** No, but that -- yes, okay. Fine.

6 **Q.** Can we move forwards, then, to POL00169386. This is
7 an email exchange of 8 January 2015 between you and
8 a number of senior individuals within Post Office about
9 a request for an interview for the purposes of the
10 upcoming BBC Inside Out programme, okay? If we just
11 scroll down, please, we can see your email there. If we
12 just look at the foot of the page, we can see you sign
13 it off "Jarnail", yes?

14 **A.** Yes.

15 **Q.** If we go back up to the top of this email, so the BBC
16 have asked for an interview for their Inside Out
17 programme and you say to Mr Davies:

18 "I had a look at this and I am concerned that [the
19 Post Office] is entering dangerous territory. This
20 situation is not straightforward and cannot be easily
21 simplified in a couple of lines.

22 "Whilst Post Office wish to say that there are no
23 systemic faults, the Second Sight ... Report which has
24 been disclosed to the defendants and their legal
25 representatives does mention two defects/bugs which rise

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1 of [the Post Office] and that information never reached
2 the Security Team. Equally it is embarrassing were it
3 to be suggested [that the Post Office] were kept in the
4 dark by such an important supplier such as Fujitsu. It
5 follows [that] these are very difficult topics from
6 a criminal law perspective."

7 We can stop reading there.

8 Do you agree that, in this email, you were
9 suggesting that you were not aware of the two bugs,
10 errors and defects mentioned by Second Sight until the
11 day or so before the publication of the Second Sight
12 Interim Report?

13 **A.** Once I was at Post Office Limited, my involvement was
14 very limited, as I said to you before. A lot of these
15 matters were dealt with by Head of Legal, General
16 Counsel and working groups. A lot of this information
17 is obtained from the advices and also discussions with
18 the expert criminal agents, Cartwright King. This isn't
19 something I formulated myself because I wouldn't have
20 the experience or the knowledge of dealing with it.
21 Even my experience at the Royal Mail Group Criminal Law
22 Team was very, very limited.

23 The only case I dealt with, *Misra*, which dealt with
24 these matters. I wasn't even sure as to what they were,
25 bugs, defects, issues, and, apart from those two, I'm

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1 to 76 branches being affected by incorrect balances or
2 transactions. The fact that the bugs manifested in more
3 than one location could be described as systemic but not
4 system wide. Accordingly there are arguments over
5 terminology used by Second Sight and it is important
6 from [a] criminal law perspective that [the Post Office]
7 does not misrepresent the content of the Second Sight
8 Report.

9 "Not only have Second Sight's use of terminology
10 [given rise] to potential [arguments] in relation to
11 terms used by Second Sight. It also raises questions as
12 to whether [the Post Office] knew of the existence of
13 those bugs. If so, to whom at [the Post Office] Fujitsu
14 communicated them. These were certainly not known to me
15 at [Post Office] Legal until day or so prior to the
16 publication of the Second Sight Interim Report. The
17 difficulty here is made worse by the fact that Gareth
18 Jenkins, an employee of Fujitsu has been making
19 statements for use in criminal proceedings which made no
20 reference to the very bugs which he it is understood he
21 told Second Sight about. People were prosecuted and
22 pleaded guilty following the receipt of his statement
23 which implied no bugs had been found. Of course it
24 would be highly embarrassing for [the Post Office] were
25 it to be suggested that Fujitsu had informed some part

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1 not aware of anything else, and that's -- here I'm
2 highlighting, of course, something that I found out
3 subsequently or relied on somebody else.

4 **Q.** I'll try again. Can we, in the second paragraph,
5 highlight the second sentence "It also raises
6 questions", and then, the third line:

7 "Those were certainly not known to me at [Post
8 Office] Legal until a day or so prior to the publication
9 of the Second Sight Interim Report."

10 My question was: you were saying to senior
11 individuals, senior management within the Post Office,
12 in this email, that you were not aware of the bugs,
13 errors and defects identified by Second Sight in their
14 Interim Report until a day or so before the publication
15 of that report, weren't you?

16 **A.** To the best of my knowledge, the only issues were those
17 ones mentioned in the case of *Misra*. Apart from that,
18 I wasn't aware of anything else. The only information
19 I have in this email is not from person involvement in
20 anything I dealt with; it was dealt with by Working
21 Group and Head of Legal and the General Counsel.
22 I mean, this --

23 **Q.** Mr Singh, sorry to speak over you but if you can please
24 focus on the question. I think the answer is yes, you
25 were saying in this email, because, according to you, it

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1 was the truth, that you were not aware of the bugs,
 2 errors and defects identified by Second Sight until
 3 a day or so before their publication of their report;
 4 and so this is true.

5 **A.** If you put it that way, sir, to -- from memory, yes.

6 **Q.** Right. So what you're saying here to POL senior
 7 management is that the two bugs, the receipts and
 8 payments mismatch bug and the local suspense account
 9 bug, were not known to you until a day or so before the
 10 publication of the report?

11 **A.** Well, it's now such a time ago, I'm not really sure what
 12 the ins and out about is but I think certainly my
 13 involvement or response to it was very late in the day
 14 because I think there's a long email, I came to at the
 15 last minute, and I am just responding from the
 16 information that's highlighted to me.

17 **Q.** The second thing you're saying is that Mr Jenkins had
 18 been making statements that contained no mention of the
 19 bugs and yet he had told Second Sight about the bugs.
 20 You make that point, don't you?

21 **A.** Yes, in light of the Clarke Advice, yes.

22 **Q.** So you're pointing the spotlight here towards
 23 Mr Jenkins, aren't you?

24 **A.** I'm summarising the position as it was in the year 2015.

25 **Q.** You say it would be embarrassing if it emerged that the

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1 I'm not sure what you're asking from me, but I can't
 2 recollect --

3 **Q.** You said in an email that it would be highly
 4 embarrassing for the Post Office if it was suggested
 5 that Fujitsu had informed some bits of the Post Office
 6 of the two bugs but that information had never reached
 7 the Security Team, and I asked you why would it be
 8 highly embarrassing?

9 **A.** Um --

10 **Q.** You said, "I can't recall what I was thinking now or
 11 back then", and I said, "Well, tell us now".

12 **A.** So I wasn't part of any breaching, either at Royal Mail
 13 Group or even when I joined -- when I transferred to
 14 Post Office Limited. I am going by what my Head of
 15 Legal and General Counsel and the advice from Cartwright
 16 King, who were the -- who the work was outsourced to.
 17 I didn't keep any files, I wasn't part from any Working
 18 Group. So I'm not sure what I am actually saying there.

19 **Q.** Would it be even more embarrassing if it emerged that
 20 Fujitsu had in fact passed on information about the bugs
 21 to the Post Office's Legal Team?

22 **A.** I don't know. As I said to you, I wasn't part of any
 23 breaching.

24 **Q.** Just focus on the question. Do you agree it would be
 25 even more embarrassing if it emerged that Fujitsu had,

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1 Post Office had been informed of bugs by Fujitsu but
 2 that information had not reached the Security Team. Why
 3 would it be embarrassing if it emerged that the Post
 4 Office had passed on information about the bugs to the
 5 Post Office but that information hadn't reached the
 6 Security Team?

7 **A.** I can't remember what I was thinking when I prepared
 8 that but it certainly wasn't -- my discussions with Head
 9 of Legal and the General Counsel, and also Cartwright
 10 King, and then them discussing it with me as to the
 11 facts, because I wouldn't have the firsthand knowledge
 12 and certainly I wouldn't have the firsthand knowledge in
 13 how to deal with these matters.

14 **Q.** Think about it now, Mr Singh. Wouldn't it be highly
 15 embarrassing because it was the Security Team that were
 16 bound up in the prosecutions? They were the ones that
 17 essentially investigated and then brought the
 18 prosecutions, weren't they?

19 **A.** I don't know what I was saying at that time, so --

20 **Q.** Think about it now, then. That's why it would be highly
 21 embarrassing, wouldn't it? The people who were bringing
 22 the prosecutions, if the information didn't reach them,
 23 but had been passed to someone within the Post Office,
 24 that would be embarrassing, wouldn't it?

25 **A.** I'm not really sure what you're asking of me, sir, but

18

1 in fact, passed on information about the two bugs to the
 2 Post Office's Legal Team?

3 **A.** Sir, I can't answer that because I --

4 **Q.** Why can't you answer it?

5 **A.** Because I don't know. I mean, I wasn't privy to that
 6 sort of information. I didn't have any contact within
 7 the wider business, as the Head of Criminal Law Team
 8 had.

9 **Q.** All of the things you're saying, Mr Singh, don't bear on
 10 the question I'm asking. Do you agree it would have
 11 been highly embarrassing if it emerged that Fujitsu had,
 12 in fact, passed on information about the two bugs that
 13 were said to have been revealed by Second Sight, and
 14 that information had been passed to the Legal team, but
 15 the Legal team hadn't disclosed them?

16 **A.** Well, it shouldn't have been done that way. I mean,
 17 I don't know about --

18 **Q.** Therefore it would have been embarrassing?

19 **A.** Well, it's embarrassing being here. But the -- all I'm
 20 saying to you, I wasn't privy to that sort of
 21 information because at the Criminal Law Team -- you that
 22 the Head of Criminal Law Team who dealt with these
 23 matters and there was -- they weren't passed down to my
 24 grade, which was a junior grade and, certainly, at Post
 25 Office Limited it was likewise. I wasn't part of any

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1 of -- the working group, or I -- the only information
 2 I had is what was passed down to me by the General
 3 Counsel or Head of Legal, who was my line manager.
 4 **Q.** Do you agree it would be more than embarrassing, a lot
 5 more serious than just embarrassing, if it emerged that
 6 the Post Office's Legal Team had made decisions not to
 7 give disclosure of bugs to the defence and to the
 8 courts?
 9 **A.** Well, I wasn't in a decision making capacity,
 10 certainly --
 11 **Q.** That's the answer to a different question, Mr Singh.
 12 I'm asking you: do you agree if it would be a lot more
 13 than just embarrassing if it emerged that Fujitsu had
 14 given information to the Post Office, to the Legal team
 15 in the Post Office, and the Post Office Legal team had
 16 made decisions not to give disclosure of that
 17 information to the defence and to the courts?
 18 **A.** I wasn't in that position to make -- I wasn't aware of
 19 it. It certainly didn't come to me.
 20 **Q.** That's a separate question, I'm just asking you: do you
 21 agree that it would be a lot more than embarrassing if
 22 what I've described was to be the case?
 23 **A.** Well, I would hope it didn't happen that way.
 24 I certainly don't know anything about that.
 25 **Q.** Mr Singh, please focus on my questions. Do you agree it
 21

1 **Q.** Did you investigate whether the Post Office knew of the
 2 existence of the two bugs before the Second Sight
 3 Report?
 4 **A.** The way it -- from memory -- I mean, from what I can
 5 recall, and certainly the papers sent to me by the
 6 Inquiry, the way these things came about, there were
 7 Working Group who worked very closely with somebody like
 8 Second Sight, the Mediation Scheme, which I wasn't part
 9 of, they had meetings which I wasn't part of. I had
 10 limited information. So I always used to get the
 11 information from the Head of Legal and I think, on these
 12 circumstances, it was a lot of work being done, a lot of
 13 working group involved, and I was told that "Look, we've
 14 got people on to it already". And I was told to task
 15 with two things, one to keep Cartwright King updated by
 16 means of the Company Secretary, who was heavily involved
 17 in this, and also to help the Head of Legal to find the
 18 information.
 19 So I did that, and relayed it to him and, hopefully,
 20 it get into the system or the people who were dealing
 21 with it. Certainly, I got the information with regard
 22 to the two bugs, which I was aware of, or issues with
 23 the *Misra* case by supplying them with, you know, the cut
 24 and paste of the legal advice by the barrister in the
 25 case, Mr Tatford, and, also, I think I phoned Fujitsu to
 23

1 would be a lot more than embarrassing --
 2 **A.** Yes.
 3 **Q.** -- if that state of affairs emerged?
 4 **A.** Well, I hope it didn't happen but, certainly, I wasn't
 5 aware of any of that, no. But, certainly, yes, I mean,
 6 I'm relaying what the information I'd been given.
 7 **Q.** At the top of the email, you say you're concerned that
 8 the Post Office is entering "dangerous territory". Why
 9 was the Post Office entering dangerous territory?
 10 **A.** Well, from what -- I mean, this is quite some time ago
 11 since I considered it. Certainly, the information I've
 12 been given from a legal point of view is to draft it in
 13 such a way because this is -- if you're going public,
 14 you've got to have your facts. It's got to be accurate
 15 and, basically, what I'm saying to them is, "Look, I'm
 16 not expert in this area, I have got limited knowledge.
 17 You need to go to the criminal specialist", you know,
 18 which is Cartwright King.
 19 I think I refer them to it, right at the bottom,
 20 because I'm concerned that that is a proper avenue.
 21 It's not somebody like myself who can actually advise
 22 them. I relayed what information I had and I think
 23 somewhere along the line or, subsequently, I say no,
 24 I can't deal with it because you really need somebody
 25 who was on the ball on this matter.
 22

1 find out whether they knew anything else and relayed
 2 that to the Head of Legal.
 3 Apart from that, that's the only investigation
 4 I had. That's the only thing I could do at that time.
 5 **Q.** Did you not investigate too deeply the issue of whether
 6 individuals within Post Office were aware of the
 7 existence of bugs before the Second Sight Report because
 8 you knew that issue didn't need investigating because
 9 you knew that you were aware of bugs?
 10 **A.** Certainly not, sir, that's not the case, to my
 11 knowledge. My involvement was basically liaison with
 12 Cartwright King, keeping -- well, any input or specific
 13 advice, which the -- my Head of Legal, who was my line
 14 manager, or -- had requested or any information he
 15 wanted or any specific advices he wanted, or the General
 16 Counsel. That was the only role I had, and that is what
 17 I was told, "Let's have a look, Jarnail, what you need
 18 to do is we've got people who have got a lot of
 19 information who are involved in it who are dealing with
 20 it and, as and when we need you to do something, you
 21 provide that", and that is to update Cartwright King via
 22 the Company Secretary and also to provide information
 23 with regard to the *Misra* case, which I did.
 24 **Q.** Just while we are on this email, in the second
 25 paragraph, it says in the third line:
 24

1 "The fact that the bugs manifested in more than one
2 location could be described as systemic but not system
3 wide. Accordingly there were arguments over terminology
4 used by Second Sight".

5 Were you aware that the Post Office kept relying on
6 the word "systemic" in its public pronouncements for
7 many years after the Second Sight Report.

8 **A.** Sir, I'm not aware of that because I wasn't involved to
9 that high level. I mean, I -- certainly a Criminal Law
10 Team, it was the Head of Criminal Law in the Post Office
11 as the working groups and you had General Counsel and
12 the Head of Legal dealing with it.

13 **Q.** You draw a distinction here between "systemic" and
14 "system wide", which may be a fair distinction. Was
15 anything done about your drawing of that distinction
16 here, to your knowledge? Was it followed up at all with
17 you?

18 **A.** That came up because that was the information I was
19 given by Cartwright King. A lot of this was in
20 discussion with Cartwright King because they had the
21 information. I wouldn't have that sort of information.
22 Or -- yeah, Cartwright King and probably the advices
23 I read. But it was that, the sort of information I had
24 from Cartwright King. It wasn't something I personally
25 had firsthand.

25

1 at all because I've read the Inquiry's papers over and
2 over again and I can't make head nor tail of what was
3 going on there.

4 **Q.** Secondly, do you accept that no disclosure was made by
5 you to the defence or to the court, in Seema Misra's
6 case, of the existence of the receipts and payments
7 mismatch bug?

8 **A.** I went aware of that -- can you put it up what the
9 receipts and payments information you're talking about
10 please?

11 **Q.** Sorry?

12 **A.** Can you put that up?

13 **Q.** We're going to come to the detail in a moment. What
14 happens when I show you a document is you tend to get
15 distracted perhaps, in terms of looking at the document.
16 So I'm just standing back at the moment and looking at
17 some general questions, you having had lots of time to
18 prepare today and have been given all the relevant
19 documents in advance of today.

20 **A.** Yes.

21 **Q.** I'm asking you: do you accept that the receipts and
22 payments mismatch bug, the existence of it, was not
23 disclosed to the defence or to the court in the course
24 of or before Seema Misra's trial?

25 **A.** I don't recall anything of that --

27

1 **Q.** I'm asking a different question, which is not "Where did
2 you get the knowledge from to write that sentence". The
3 question I'm asking is: after you wrote this, was
4 anything done about it?

5 **A.** Well, as I said to you, that was highlighted to the Head
6 of Legal and everything I did was in line with what --
7 the input he'd requested or he wanted. I didn't have
8 any other task; I didn't have any -- anything more than
9 that because I was told that working groups --

10 **Q.** Mr Singh, I'm sorry to --

11 **A.** Sorry.

12 **Q.** -- be persistent. Would you kindly answer my question:
13 was anything done, to your knowledge, about the
14 distinction that you drew here?

15 **A.** I don't know, sir.

16 **Q.** Okay, I'll move on. Can I turn, then, to your true
17 state of knowledge in relation to the two bugs mentioned
18 by Second Sight in the early parts of their report and,
19 firstly, look at your prior knowledge of the receipts
20 and payments mismatch bug. I'm going to ask you some
21 simple questions first before we go into the detail.

22 First, do you accept that, in fact, shortly before
23 Seema Misra's trial began in October 2010, you were made
24 aware of the receipts and payments mismatch bug?

25 **A.** I can't recall. I don't remember anything around that

26

1 **Q.** Surely, Mr Singh, you know about this. This case went
2 off to the Court of Appeal. You must have read the
3 Court of Appeal's judgment, which says it was an error
4 not to have disclosed it, but the Post Office conceded
5 that there should have been disclosure, and this is one
6 of your cases that you prosecuted.

7 **A.** Well --

8 **Q.** You must know --

9 **A.** The --

10 **Q.** -- there was no disclosure.

11 **A.** Well, as I said to you, the -- my knowledge in this area
12 is very limited. Apart from the *Misra* case, I've not
13 come across any other case where I was -- I mean, even
14 as to what they were, was the only time I came across
15 it. And that's why, when I dealt with the *Misra* case,
16 I had experienced counsel and experienced Investigation
17 Officer working alongside me. I have -- the disclosure
18 was dealt with, in this case, by Head of Criminal Law,
19 like I told you on the last occasion.

20 **Q.** Let's just go back to the question: do you accept that
21 there was no disclosure of the existence of the receipts
22 and payments mismatch bug in Seema Misra's case?

23 **A.** From what the Inquiry has paper sent me, I wasn't aware
24 of that and I, obviously, couldn't deal with because
25 I wasn't aware of it, no.

28

1 Q. Do you accept that your claims made in the 2013
2 documents that we've just looked at and the 2015 email
3 that we've just looked at, that the first you became
4 aware of the receipts and payments mismatch bug, upon
5 production of the Second Sight Report, were false?
6 A. No. That's not true.
7 Q. You'd known about the bug all along, hadn't you,
8 Mr Singh?
9 A. No, that's not true.
10 Q. You had known about the bug all along, Mr Singh.
11 A. No.
12 Q. You were covering it up in 2013 and 2015, weren't you?
13 A. No, I wasn't covering it up.
14 Q. You were covering up your own guilty knowledge?
15 A. No, I wasn't.
16 Q. Did you not recognise in 2013, '14 and '15 that this
17 wasn't the time to dig in, to double down; it was, on
18 the contrary, time to open up your mind to the reality
19 that you had known about the receipts and payments
20 mismatch bug and you had failed to disclose it?
21 A. I wasn't aware. If I had known, I would have disclosed
22 it. In the *Misra* case, any other case, I had limited --
23 I had no knowledge of those, at that time, or even when
24 I transferred over to the Post Office Limited and I, as
25 I said to you, as far as the Second Sight's inquiry --

29

1 Q. POL00028838. Page 6, please. This is a report entitled
2 "Correcting Accounts for 'lost' Discrepancies" written
3 by Gareth Jenkins, you understand?
4 A. Yes, yes.
5 Q. You can see the author there is Gareth Idris Jenkins.
6 Can you see the reference that's given, just above his
7 name there?
8 A. Yes, yes.
9 Q. The character string notes "lost discrepancies", yes?
10 A. Yes.
11 Q. If we just look at the introduction to see what it's
12 about, this is a note about the receipts and payments
13 mismatch bug. This note relates to some PEAKs and then,
14 moving under the box, one of the PEAKs describes
15 a problem with stock unit balancing that will result in
16 a receipts payments mismatch. A fix is available for
17 this PEAK which needs to be scheduled, however any
18 branch encountering the problem will have corrupt
19 accounts.
20 Then if we go to page 7, it sets out the
21 consequences of the bug:
22 "There will be [first bullet point] a receipts and
23 payments mismatch corresponding to the value of
24 discrepancies that were 'lost'.
25 "... if the user doesn't check their final balance

31

1 the review is concerned, anything related to it, I was
2 not involved in it. We had working groups, so
3 everything you said is not true.
4 Q. You were part of a group of people that doubled down on
5 their position, not only having failed to give
6 disclosure of the receipts and payments mismatch bug in
7 2010 but then you sought to cover up that fact from 2013
8 onwards, and it would take another seven years, until
9 2020, for Mrs Misra, who'd been sent to prison whilst
10 pregnant --
11 A. Not true. That is absolutely not true.
12 Q. -- to have her conviction overturned?
13 A. Well, that's the Court of Appeal. I mean, I -- there
14 were problems with this cases but there is no way
15 I would have cover up anything of that magnitude.
16 I wasn't aware, I wasn't made aware, I don't recall any
17 of the information, and it was very difficult to put the
18 Inquiry papers together because they came in separate
19 bundles, or -- that's why it's not dealt with in the
20 witness statement because I think the -- quite a lot of
21 the -- a lot of it relating it to came subsequently, and
22 there certainly was no cover-up on my part.
23 Q. Can we look then at your actual knowledge of the
24 receipts and payments mismatch bug?
25 A. Yes.

30

1 report carefully they may be unaware of the issue since
2 there is no explicit message when a receipts and
3 payments mismatch is found ...
4 "Local suspense will have no knowledge of the
5 discrepancy."
6 So it's saying that there is a bug that gives
7 a misbalance between receipts and payments,
8 ie a mismatch, and that it will be unknown to the user;
9 okay?
10 A. Okay.
11 Q. That is what I'm going to call Mr Jenkins' report. We
12 should have just looked at the date of it on the first
13 page, so back a page, please, 29 September 2020 (*sic*),
14 okay?
15 A. Yes.
16 Q. Can we look, please, at --
17 **SIR WYN WILLIAMS:** 2010, Mr Beer.
18 **MR BEER:** Did I say '20? I'm so sorry.
19 **SIR WYN WILLIAMS:** Yes, let's get that accurately on the
20 record.
21 **MR BEER:** Thank you sir, I blame that on the flu.
22 Can we go forwards, please, to POL00055410. Can we
23 look down, thank you -- in fact, if we just look at the
24 top, first, so we can see who this is sent to. It's
25 from Mr Wilson to Juliet McFarlane and to you, yes?

32

1 A. Yes.
 2 Q. Then let's look down on the email. From Mr Simpson in
 3 Post Office Security Team, and we're now on 8 October,
 4 and he says to Mr Wilson first:
 5 "I am forwarding you the attachments above in
 6 relation to a series of incidents identified by Fujitsu
 7 this week, whereby it appears that when posting
 8 discrepancies to the local suspense, these amounts
 9 simply disappear at branch level and a balance is shown.
 10 The above includes Fujitsu's initial analysis and
 11 proposed solution/s, whilst the other documents the
 12 outputs from various meetings held this week. My
 13 concern is around the proposed solution/s, one or more
 14 of which may have repercussions in any future
 15 prosecution cases and on the integrity of the Horizon
 16 Online system.
 17 "There is a further dial-in meeting ..."
 18 Yes?
 19 A. Yes, yes.
 20 Q. If we go up the page, please, Mr Wilson forwards this to
 21 you at 4.29 pm on 8 October, yes?
 22 A. Yes.
 23 Q. Can you see that?
 24 A. Yes, I can.
 25 Q. Would you agree that, for someone who was prosecuting

1 because he knew my knowledge about these things was very
 2 limited. I --
 3 Q. Just go down the page, please. In the first paragraph:
 4 "It appears that when posting discrepancies to the
 5 local suspense, these amounts simply disappear at branch
 6 level and a balance is shown."
 7 Then rang on:
 8 "Solutions may have repercussions in any future
 9 prosecution cases and on the integrity of the Horizon
 10 system."
 11 That would ring alarm bells for you, wouldn't it?
 12 A. It certainly would but I --
 13 Q. Thank you. Because it mentions, on its face,
 14 repercussions for prosecutions and on the integrity of
 15 Horizon Online?
 16 A. Yeah, but what my evidence is that I don't remember
 17 receiving it, don't remember printing it and that is
 18 not -- I didn't -- I don't know anything about this.
 19 Q. Okay. If we just go back up, please. You'll see that
 20 the email that was sent to you had two attachments. Can
 21 you see that, under "Attachments"?
 22 A. Yes.
 23 Q. The first of which was called "ReceiptsPayments
 24 notes[version 5.doc"]?
 25 A. Yes.

1 subpostmasters at the time, this email ought to ring
 2 alarm bells?
 3 A. Yes.
 4 Q. Because it's showing, isn't it, Mr Singh, that money is
 5 disappearing at branch level and balances are shown that
 6 are incorrect?
 7 A. I've looked at the Inquiry bundle, I don't recall
 8 reading this email and I don't remember printing,
 9 where -- printing anything -- you know, there's a bit
 10 from my -- I don't know what you call it -- account, at
 11 all.
 12 Q. Your drive, your system? Is that what you're talking
 13 about?
 14 A. Yeah, I --
 15 Q. You're a couple of questions ahead, Mr Singh. You know
 16 I'm going to turn next --
 17 A. No --
 18 Q. -- aren't you --
 19 A. -- because I'm telling you that is why it's not in my
 20 witness statement because I didn't understand it. If
 21 I even received it, I wouldn't understand it, to be
 22 honest, it would be something I would expect somebody
 23 with knowledge and expertise, like Mr Wilson, who is the
 24 contact within the business, to not send it the way he
 25 has, "FYI", because it doesn't mean anything to me

1 Q. The second was called "Lost Discrepancies 290910.doc",
 2 yes?
 3 A. Yes.
 4 Q. Remember what Mr Jenkins document was called, "Lost
 5 Discrepancies", yes?
 6 A. Yes.
 7 Q. Remember its date, 29 September 2010, yes?
 8 A. Oh, yes, absolutely.
 9 Q. Let's display POL00028838, please. Then scroll down,
 10 please, to page 6, please. Thank you. You'll see that
 11 in the reference again this document was called
 12 "Notes\lost discrepancies", and it's dated 29 September
 13 2010, yes?
 14 A. Yes.
 15 Q. If we look at the footer of the page, please, the
 16 character string at the bottom C:\documents and
 17 settings\jarnail.a.singh\local Settings\temporary
 18 internet files", et cetera. This was saved in your
 19 drive, wasn't it?
 20 A. I don't know, sir. As I said to you, I don't recall
 21 seeing it, don't recall printing it.
 22 Q. This was saved in your drive, wasn't it?
 23 A. I don't even know what you're talking about. I don't
 24 know how to do -- these things worked.
 25 Q. You don't know how to save a document?

1 A. No, I didn't know at the time in year 2010.
 2 Q. For the decades you worked in the Post Office you didn't
 3 save a document?
 4 A. Certainly not when I was at the Royal Mail Group.
 5 Q. You never saved a document?
 6 A. Not on -- no, because I didn't know how to do it.
 7 Q. You know, don't you, that you got this email. You got
 8 Mr Jenkins' documents and, not only was it saved in your
 9 drive, you printed it, didn't you?
 10 A. No, that's not the case.
 11 Q. How can you recall whether you printed a document or
 12 not?
 13 A. I don't recall. That was the reason why it was
 14 difficult to remember it, otherwise I would have --
 15 would certainly try to find out what this means, because
 16 the document in that -- at that time, the year 2010,
 17 I didn't have the knowledge, certainly didn't have the
 18 technical knowledge, or what it meant, I needed somebody
 19 to explain it to me, and then deal with it accordingly.
 20 But I do not remember this document at all or the email.
 21 Q. Can we display at the same time POL00055410. We can see
 22 the email sending this document to you is timed at
 23 4.29 pm; can you see that on the left-hand side?
 24 A. Yes, I can, yes.
 25 Q. We can see that it was printed nine minutes later at

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1 did you?
 2 A. I didn't -- if -- I don't have any recollection of
 3 receiving it or seeing it.
 4 Q. You know now that the Post Office conceded before the
 5 Court of Appeal that there ought to have been such
 6 disclosure, don't you?
 7 A. Well, this ought to have been dealt with by the Head of
 8 Criminal Law Team. It doesn't make any sense to me.
 9 He's an expert, he has a wider knowledge of these things
 10 as to why he just sent it as "FYI". He's a man of
 11 experience and knowledge and expertise. I've never
 12 known anything received from him without any detailed
 13 knowledge as to what to do with it. He gives very
 14 detailed instructions, and he just sent it as "FYI".
 15 I can't understand that at all and I can't recall
 16 receiving it, or reading it or printing it at that time,
 17 and the only time I have read it is when the Inquiry
 18 sent me the papers.
 19 Q. You had a meeting with Mr Wilson about it, didn't you?
 20 A. I don't recall that meeting.
 21 Q. That's referred to in the second line of the email on
 22 the left.
 23 A. That is -- I think must be a team meeting but I know
 24 certainly me and the legal executive and my secretary
 25 were dealing with the *Misra* trial with the exhibits,

39

1 4.38.
 2 A. Yes.
 3 Q. Can you see that at the bottom?
 4 A. No, it's there, yes.
 5 Q. You printed this document out, didn't you?
 6 A. No.
 7 Q. You did so because you'd read the email from
 8 Messrs Simpson and Wilson and you printed the document
 9 out, didn't you, the attachment out?
 10 A. That's not true. I don't remember seeing the email from
 11 Rob Wilson, the attachments to it, at all. From memory,
 12 I don't recall the document.
 13 Q. What you're engaged in now is closing your mind to the
 14 possibility that you saw this, blind denial, because you
 15 know that this is evidence of your own guilty knowledge?
 16 A. That is not true and I don't feel guilty because
 17 I haven't received it. If I did, I would have dealt
 18 with it by understanding what it meant, and I --
 19 Q. You just said, "If I had received it"?
 20 A. If I had seen it. I don't recall receiving it, or
 21 reading it, or printing it. That is my evidence on
 22 oath.
 23 Q. This is the Tuesday, the week before Seema Misra's trial
 24 started on the Monday -- Friday, I'm so sorry. You
 25 didn't disclose the existence of this bug in the trial,

38

1 from memory, exhibits, and the jury bundles. I don't
 2 know --
 3 Q. You were the solicitor with conduct of *Misra*, weren't
 4 you?
 5 A. Yes, I was, yes.
 6 Q. It fell to you to give disclosure of this bug, didn't
 7 it?
 8 A. If I received it and understood it, but don't remember
 9 receiving that email with those attachments.
 10 Q. So what we've got is an email addressed to you attaching
 11 details of the bug, we've got a copy of the document
 12 saved in your drive and we've got it printed nine
 13 minutes after the email was received by you; and you say
 14 you didn't get any of this?
 15 A. No, as I said to you, I do not recall this document at
 16 all. The email and the attachments. I even -- when
 17 I got the papers from the Inquiry, I didn't understand
 18 it at all what it meant because this is not an area
 19 where I was that comfortable with in understanding. So
 20 I needed somebody who did and I don't firstly remember
 21 receiving any of this --
 22 Q. It follows, doesn't it, that when you were saying in
 23 2013 and 2015 that the first you had heard about the
 24 receipts and payments mismatch bug was when Second Sight
 25 "revealed it", in inverted commas, in their report, that

40

1 was false, wasn't it?
 2 **A.** No, that is not the case.
 3 **Q.** It was false in 2013 and it was false in 2015, wasn't
 4 it?
 5 **A.** No, that's not the case. That's not true.
 6 **Q.** You knew you'd been told about this bug looking 2010,
 7 just before the trial --
 8 **A.** No.
 9 **Q.** -- and you were covering it up in 2013 and 2015, weren't
 10 you?
 11 **A.** No, there has been no cover-up on my part and never will
 12 be and never can be.
 13 **Q.** Can we take that down, please, and you look at your
 14 witness statement, please, page 68, paragraph 204.
 15 Sorry, I think it was your first witness
 16 statement --
 17 **SIR WYN WILLIAMS:** I was just about to ask you, Mr Beer.
 18 It's the first one?
 19 **MR BEER:** -- which is WITN04750100, page 68, please.
 20 So page 68, please. Thank you. Foot of the page,
 21 paragraph 204, you say:
 22 "I have considered the document entitled 'Correcting
 23 Accounts for "lost" Discrepancies' ..."
 24 That's the Gareth Jenkins document of 29 September
 25 2010. You say:

41

1 **Q.** You didn't know that we would get hold of the document,
 2 the email, dated 8 October, showing that this had, in
 3 fact, been sent to you.
 4 **A.** No, that's not the case.
 5 **Q.** You didn't pay this much attention when you were writing
 6 this witness statement by looking at the character
 7 string at the bottom of the document, to see that it, in
 8 fact, had been saved in your drive, did you?
 9 **A.** That's not the case. That's not true.
 10 **Q.** You're not really a details man, are you?
 11 **A.** Well, I don't know what you mean, but ...
 12 **Q.** You weren't paying the attention that it deserved to the
 13 details when you were writing this, were you? You
 14 didn't see that you'd printed the document, did you?
 15 **A.** I don't know what you mean, sir, but I can tell you,
 16 I did not see that document until -- before the Inquiry
 17 sent it to me.
 18 **MR BEER:** Sir, that might be an appropriate moment for the
 19 morning break. Can we break from now until 11.00,
 20 please.
 21 **SIR WYN WILLIAMS:** Yes.
 22 (10.50 am)
 23 (A short break)
 24 (11.00 am)
 25 **MR BEER:** Good morning, sir, can you see and hear us?

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1 "I do not recall having seen this document before
 2 the Inquiry provided it to me. If I had known about
 3 this document, I would have provided it to the
 4 Investigation and Security Team to try and understand
 5 what it meant, the implications of it and whether the
 6 problem was being resolved. Once it had been assessed,
 7 I would have considered the disclosure test and
 8 disclosed it."
 9 In this witness statement, you're seeking to carry
 10 on the pretence, aren't you, that you hadn't seen the
 11 document in 2010, weren't you?
 12 **A.** No, sir, that's not the case.
 13 **Q.** You're here running the same line as you had run in 2013
 14 and 2015, aren't you --
 15 **A.** No.
 16 **Q.** -- giving false evidence to the Inquiry?
 17 **A.** No, I do not give false evidence. I'm here to assist
 18 and that's what I'm doing.
 19 **Q.** When you wrote this, you didn't know that we would
 20 discover an email sending the document to you of
 21 5 October, did you?
 22 **A.** No, that's not the case. I don't remember any of these
 23 documents at all --
 24 **Q.** Sorry, 8 October --
 25 **A.** -- preceding to the Inquiry.

42

1 **SIR WYN WILLIAMS:** Yes, thank you, yes.
 2 **MR BEER:** Mr Singh, did you maintain a hard copy file for
 3 each case that you prosecuted?
 4 **A.** Yes.
 5 **Q.** Did you print documents and add them to the file?
 6 **A.** I didn't personally. What used to happen, it was the --
 7 we had a desktop and my secretary did -- I did the
 8 dictation, my secretary did the typing and she did the
 9 printing.
 10 **Q.** So would you say, "Please print a document and add it to
 11 the file"?
 12 **A.** I don't know how the system was set up but, certainly,
 13 I dictated and she did the -- you know, for example, if
 14 the letter came in, I would dictate it with the physical
 15 file, and put -- and gave it to her and she would do
 16 the --
 17 **Q.** I'm not talking about letters out at the moment; I'm
 18 talking about documents in. If you received an email
 19 and you wanted it added to the file, you would say,
 20 "Please print this email", "Please print this document"?
 21 **A.** She would -- yes, yes.
 22 **Q.** How would she have access to your system?
 23 **A.** I don't know, sir, to be honest.
 24 **Q.** Did she have access to your system?
 25 **A.** She had access to the system, yes.

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1 Q. You didn't have to forward her the email?
 2 A. No, I don't think so.
 3 Q. So if we were to find a copy of Mr Jenkins' report on
 4 the *Seema Misra* hard copy file, that would mean that you
 5 had given an instruction for it to be printed, would it?
 6 A. I can't recall how it works out now but, certainly,
 7 I wasn't very good at the IT side of things, the
 8 printing, and all I did is dictated stuff and she did
 9 the rest, and she made up the file and she printed, you
 10 know, the emails. I very rarely -- I don't think
 11 I remember printing very much at all because I didn't
 12 know how to.
 13 Q. You knew the high importance of the *Seema Misra* case to
 14 the Post Office, didn't you?
 15 A. Yes, it's still very important to me now, sir.
 16 Q. Back in the day --
 17 A. Yes, yes.
 18 Q. -- back in October 2010, you knew it was of critical
 19 importance to the Post Office?
 20 A. It was important to me because it's the very first one
 21 I've been able to take it all the way with the
 22 documents. They were -- every single document in that
 23 case was new to me and I was very careful and very
 24 cautious. I had Mr Longman, Mr Tatford, even Mr Jenkins
 25 onto it, Mr Wilson, because I didn't feel comfortable.

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1 done with it -- would have done with it.
 2 Q. All of this, "If I received it, if I read it", is a big
 3 fat lie, isn't it?
 4 A. No, sir --
 5 Q. And you know it, Mr Singh.
 6 A. Sir, I didn't come here to lie. I'm at an age where
 7 I've come to assist the Inquiry and that's all. And if
 8 I had seen it at that time, that is what I would have
 9 done. I'm not one of those -- I -- the -- you've seen
 10 it. You called me a letterbox. That's a compliment to
 11 me because that's the way I work. If I don't understand
 12 anything, I don't understand a thing, I will find
 13 somebody who does. Here Mr Tatford was my guy and so
 14 was Mr Longman. So that's the way we worked.
 15 The first thing would have been, it would have been
 16 forwarded to him, we would have discussed it and we
 17 would have dealt with it.
 18 Q. Can we look, please, at POL00055418. This is an email
 19 half an hour earlier, on Friday, 8 October, to you from
 20 Ms Talbot, copying in Mike Granville and Rod Ismay.
 21 They were Senior Managers in the business, weren't they?
 22 A. I know Mandy Talbot. I've never heard of Mike
 23 Granville. I don't know who Rod Ismay was either. She
 24 was a bit of a nuisance and I don't think I've actually
 25 responded to her very much.

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1 I think there was a number of occasions when I said to
 2 Mr Wilson, "Rob, you need to take this case on. I just
 3 can't cope with it", because, you know, it was --
 4 everything was so new and I was so careful and
 5 methodical with it because I knew, you know, that
 6 somebody's -- somebody's -- you know, I didn't want to
 7 get anything wrong on it.
 8 Q. So being careful and methodical you would have received
 9 this email and read it carefully, wouldn't you?
 10 A. As I said to you, if I'd received it, if I'd even seen
 11 it, the first thing I would have done is probably send
 12 it to Mr Tatford and Mr Longman because we were working
 13 very closely together on this and, certainly,
 14 Mr Tatford -- and probably, because of the nature of it
 15 I didn't understand it, and you've got the *Misra* case on
 16 Monday, we've been very close-knit team. He would have
 17 received it and he would have probably rang me or
 18 I would have rang him and said, "Look, Mr Tatford, what
 19 does it mean? What do we do, please?" That's how it
 20 worked.

21 And the same as Mr Longman. Mr Longman was
 22 wonderful all the way through because he was very
 23 helpful to me because he was an expert at dealing it
 24 Fujitsu and all side of things so that's the first thing
 25 I'd've done. If read it, that would have been what I've

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1 Q. Sorry, who was a nuisance?
 2 A. Mandy Talbot because I think she kept on asking all sort
 3 of weird and wonderful questions and I just referred her
 4 to Mr Wilson because I just didn't understand what --
 5 where -- you know, what information -- what inferences,
 6 she was asking for. So everything I highlighted, and
 7 I just referred her to Mr Wilson, and Mr Wilson being of
 8 the same rank -- or they probably had a lot of
 9 discussions but I had very little to do with her.
 10 Q. Anyway, just before you received the email containing
 11 the details of the receipts and payments mismatch bug,
 12 Ms Talbot is writing to you saying:
 13 "Mike and Rod are also very interested in any
 14 developments ..."
 15 Did you think at the time, "I don't even know who
 16 Mike and Rod are"?
 17 A. Probably. I mean --
 18 Q. "Dear Mandy, please explain who Mike and Rod are"?
 19 A. I didn't do that. I didn't even respond to her, I don't
 20 think because I was so focused on that particular case.
 21 I knew her from the old days when she was in the Civil
 22 Litigation Department, when we were in the same
 23 building, but I didn't really speak to her very much.
 24 All of a sudden, in this case, she appeared from nowhere
 25 and I think the only other involvement we had is when

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1 Mrs Misra highlighted the computer magazines and the
 2 list of cases, and I think Warwick Tatford went to meet
 3 her to review those cases. But I don't think I've ever
 4 head very much to do with her. I don't think I've met
 5 her since our days when we were in the same building,
 6 Impact House in Croydon.

7 **Q.** Anyway, these two men that you don't know are:
 8 "... very interested in any developments at the
 9 trial next week which impact on Horizon. You promised
 10 to let me know if anything unfortunate occurred in
 11 respect of Horizon."

12 That's written as if Ms Talbot had had
 13 a conversation with you or a communication with you in
 14 which you had said, if something unfortunate happens you
 15 would let her know; is that right?

16 **A.** Don't -- I probably had a very glancing conversation.
 17 There wasn't anything about "unfortunate". I don't know
 18 what she was talking about there, as to what she
 19 mentioned, but it was -- I don't even recall the
 20 conversation. As I said, the only conversation she had
 21 was with Rob Wilson, Head of Criminal Law Team, because
 22 they probably meet the same people, they had the same
 23 briefing, and they were, you know, a contact within the
 24 business.

25 I had no contact within the business, the only
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1 Minister this week and were accompanied by Issy Hogg
 2 [the defence solicitor] and the lady from Shoosmiths."

3 This email left you in no doubt as to how important
 4 the trial was to the business, didn't it?

5 **A.** No, sir, that didn't even occur to me. Mrs Misra was
 6 the most important person because I was focused on
 7 dealing with her case, in the best -- best of my
 8 ability. Certainly, I don't think I replied to it, but
 9 if I did replied it, I would have left it to Rob Wilson
 10 to deal with her.

11 **Q.** You didn't reply to this because you understood that
 12 this was conveying the message, "The Horizon system is
 13 on trial next week, you need to tell us if anything goes
 14 wrong"?

15 **A.** No, Mrs Misra was on trial, not Horizon. Horizon didn't
 16 occur to me at all. I don't even understand the
 17 Horizon. I was dealing with the trial, as the trial
 18 would do. Horizon is something that Jon Longman and
 19 Mr Jenkins dealt with.

20 **Q.** This would have put in your mind, wouldn't it, when you
 21 received the receipts and payments mismatch
 22 documentation, the high importance of it, wouldn't it?

23 **A.** No, no, that was -- I didn't receive that document, as
 24 I said to you. If I did, my team, or Mr Tatford and
 25 Mr Longman would have been the first people who were
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1 people I knew was Rob Wilson and, probably, you know,
 2 Juliet McFarlane, Mrs Debbie Stapel and the two legal
 3 executives, who I worked with.

4 **Q.** "Please can you copy Rod and Mike into any messages."
 5 You didn't reply and say, "Well, why should I do
 6 that? I don't know who these men are".

7 **A.** I don't recall, to be honest.

8 **Q.** "Incidentally I assume you have briefed external
 9 relations."

10 Had you briefed external relations?

11 **A.** I don't even know who external relations she was
 12 referring to. At that time, I mean, certainly when
 13 I moved to Post Office Limited, you know, they had a big
 14 department, big, big room like this, with a lot of
 15 cameras and videos and all sorts of things, but
 16 certainly, at that time, I don't know what she was
 17 talking about, communications.

18 **Q.** Did you reply and say, "I don't know what you mean by
 19 external relations"?

20 **A.** No, I don't think I replied in those terms, I probably
 21 could not --

22 **Q.** "Can you let us know who you have briefed because Mike
 23 and Rod may wish to have input into any story relating
 24 to Horizon. They may give you a call ... for an update.
 25 Incidentally Postmasters for Justice met with the
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1 copied in. Like we always did, you've seen how we went
 2 through the *Misra* case, in a very methodical, careful
 3 way, and I admit mistakes were made and I'm sorry that
 4 Mrs Misra suffered, and I am ever so embarrassed to be
 5 here that we made those mistakes and put somebody's
 6 liberty at stake and the loss she suffered, and the
 7 damage we caused, which is not what this was about.

8 This email doesn't mean anything to me. I don't
 9 even remember receiving --

10 **Q.** This tells you that there is a lot riding on the trial,
 11 doesn't it?

12 **A.** No, sir, it did not.

13 **Q.** External relations need to be briefed, input needs to be
 14 made in relation to a story relating to Horizon, JFSA
 15 have met with a minister. It's all ramping it up for
 16 you, isn't it, how important the trial is, because it's
 17 really about Horizon, this trial, isn't it?

18 **A.** Absolutely not, and I don't know anything about the, you
 19 know, the Masters for Justice (*sic*), ministers and
 20 Shoosmiths. Issy Hogg, yes, because she was the defence
 21 solicitor, but the others don't mean anything to me and,
 22 certainly -- I don't know, you can read what you like
 23 into that content, I didn't see it in that way. She
 24 wrote, I ignored it, and it was something that Rob
 25 Wilson dealt with. I did not deal with her in any shape
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1 or form before the case, after the case.
 2 **Q.** Thank you. That can come down.
 3 Can I turn to your knowledge of the local suspense
 4 account bug, please, and have up on the screen
 5 POL00144919. If we can go to page 3, please, this is
 6 an email chain we're going to see later was forwarded to
 7 you. It's an email exchange between Lesley Sewell, who
 8 was the Chief Information Officer at the Post Office, to
 9 Paula Vennells and others, of the 28 June 2013. It's
 10 about the local suspense account bug, so it's
 11 an exchange amongst senior individuals within the
 12 organisation. If we look at the timeline, just a little
 13 bit further up, please:
 14 "First raised to NBSC at 4.51 pm on 25 February ...
 15 "Problem diagnosed 28 February."
 16 Then under "Root Cause":
 17 "When calculating the office balances of gains and
 18 losses of stock units for a branch after pulled together
 19 into one place (this is called the Local Suspense).
 20 This is temporary data which is held in the system until
 21 the end of the Trading Period and the branch balances.
 22 After each trading period this should be cleared so the
 23 opening balance is zero at the start of the next trading
 24 period.
 25 "For the 14 branches this temporary data was not

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1 **A.** I, as far as local suspense accounts are concerned,
 2 I have no knowledge, I don't know what they mean.
 3 Secondly, these things was copied in by my line manager,
 4 Hugh Flemington. I spoke to him and he said we'd got
 5 a working group looking into it. I don't know whether
 6 he actually named who was involved in it and he said,
 7 "Look, I want to" -- he had some sort of plan of action.
 8 So there were various people doing various things and he
 9 asked me to do one or two things as part of it, and he
 10 said "Well, when I need you, when I want you to -- to
 11 just keep an eye on things, and when I need you, when
 12 I want you, to provide me with the information, do
 13 that".
 14 And on -- here, you've got Working Group involved in
 15 it and you've got, I think, a few other people involved
 16 in it, you know, Bond Dickinson and maybe Cartwright
 17 King. But my role, as far as my line manager was
 18 concerned, was to keep an eye on things and, as and when
 19 he required any information, input or specific advice,
 20 he will come to me. So ...
 21 **Q.** My question, Mr Singh, was: was there something of
 22 a scabbling around, in the weeks before in the Second
 23 Sight Report, when it emerged they're going to talk
 24 about these two bugs -- receipts and payments and local
 25 suspense -- to find out when within the organisation we

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1 cleared which resulted in it reappearing in the same
 2 trading period the following year. This only affected
 3 two trading periods [9 and 10]. This would have
 4 affected the subpostmaster balance as his opening figure
 5 would have been incorrect for that period."
 6 If we go to page 1, please. At the foot of the
 7 page, please. This is forwarded to you from Hugh
 8 Flemington on 28 June, so later that day, saying:
 9 "Rob [Wilson] -- have we more detail from Rod Ismay
 10 as to when we spotted this?"
 11 Then at the top of the page, please:
 12 "The effects of the 14 bug on branch accounting were
 13 notified to [Post Office] by a few [subpostmasters] in
 14 around January 2012. However, [Post Office] did not
 15 identify Horizon as the root cause until January 2013."
 16 So, at this time, in June 2013, you're being told
 17 that there's a separate bug called the local suspense
 18 account bug, the affects of which have been felt from
 19 January 2012, but Horizon had been identified as the
 20 root cause in January 2013, yes?
 21 **A.** Yes.
 22 **Q.** Was there a rush within the Post Office to find out, in
 23 the weeks before the publication of the Second Sight
 24 Report on 8 July 2013, when the Post Office was aware of
 25 the bugs referred to in the report?

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1 knew about them?
 2 **A.** I wasn't involved in it. I wasn't aware of it. There
 3 was probably a certain amount of work that was carried
 4 on. As I say, there was working groups who deal with
 5 it, there were specific people on to those working
 6 groups, and they probably did. They probably had
 7 meetings with the Second Sight. I had no meeting with
 8 Second Sight. I don't think I ever met Second Sight.
 9 I can't say to you --
 10 **Q.** Mr Singh, you're answering questions that haven't been
 11 asked. The things you've just said would be an answer
 12 to a question "Did you ever meet Second Sight?" and
 13 you'd say, "No, I didn't meet Second Sight". But I've
 14 not asked that.
 15 **A.** I apologise. I apologise. I'm trying to -- okay, ask
 16 me again and then I'll give you a straight answer.
 17 **Q.** Was there something of an internal scabbling around in
 18 the period before 8 July 2013 in the Post Office --
 19 **A.** I don't recall, I don't --
 20 **Q.** -- to find out "When did we know about these two bugs?"
 21 **A.** I don't recall specifically that was happening in the
 22 background but it was not to my knowledge.
 23 **Q.** Do you agree that's what this email chain seems to be
 24 about: a timeline of Post Office knowledge of the local
 25 suspense account bug?

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1 A. I can't say to you one way or the other. I don't know
 2 but, certainly, there is some sort of activity going on,
 3 yes.
 4 Q. Would this not prompt you to reveal "Hold on, I may not
 5 know about this bug, the local suspense account bug, but
 6 I did know about the receipts and payments mismatch
 7 bug"?
 8 A. No, sir, because I -- like I said to you before the
 9 break, I wasn't aware of that.
 10 Q. "I've known about that bug for three years and I didn't
 11 disclose it in criminal proceedings"?
 12 A. No, sir, that's not how it was. I told you I wasn't
 13 aware of it, and that is the way my evidence is. No,
 14 I was not aware of that.
 15 Q. Can we turn to your knowledge of the Callendar Square or
 16 Falkirk bug, by looking at FUJ00122794. Start by
 17 looking at page 2, please. Can we see an email dated
 18 5 February at 2010, from you -- in fact, it's your
 19 secretary, Marilyn Benjamin, yes --
 20 A. Yes.
 21 Q. -- to David Jones, Gareth Jenkins and Penny Thomas, with
 22 the heading, "West Byfleet issues -- Seema Misra --
 23 Legally Privileged".
 24 So David Jones, he was a lawyer, right?
 25 A. Yeah, I believe at Fujitsu, yes.

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1 A. Yes.
 2 Q. Mr Jenkins' reply, which I think I can skip over, go to
 3 page 1, please. Bit further up, thank you.
 4 Mr Jones' reply to you:
 5 "This is an email that I received earlier from
 6 Gareth. You will see that he is clear that in order to
 7 answer counsel's questions [Warwick Tatford's questions]
 8 about any issues he needs to be able to check the
 9 underlying transaction logs to be able to say whether
 10 there were any issues. On the specific issues you raise
 11 Gareth's view is:
 12 "2. [This is about Falkirk] He needs if and time to
 13 research the background to this case before providing
 14 any response;
 15 "3. He is not currently in a position to make
 16 a clear statement. It is possible for there to be
 17 problems where transactions have been 'lost' in
 18 particular circumstances due to locking issues. When
 19 this happens then we have events in the underlying logs
 20 to indicate that there was an issue. Whenever we
 21 provide transaction logs to [the Post Office] we check
 22 for such events. In the case of West Byfleet, we have
 23 not been asked to provide any transaction logs and so
 24 have not made these checks."

25 So this is telling you about the Callendar Square

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1 Q. A Fujitsu lawyer. You say:
 2 "Dear David and Penny,
 3 "On first glance, points 2-4 have not been answered
 4 which I reproduce below."
 5 Then point 3:
 6 "When Gareth Jenkins completes his statement ..."
 7 Sorry, I should have read point 2:
 8 "My barrister telephoned me yesterday evening and
 9 requested that I find out any information that Fujitsu
 10 may hold in relation to an office called Callendar
 11 Square in Falkirk. Apparently, Anne Chambers a systems
 12 specialist employed by Fujitsu was cross-examined and it
 13 is said that she had full knowledge of an error in the
 14 Horizon system at this Post Office. Our barrister would
 15 like Gareth to deal with this matter and expand upon
 16 whichever issue Anne Chambers raised at court within his
 17 statement.
 18 "3) When Gareth completes his statement could he
 19 also mention whether there are any known problems with
 20 the Horizon system that Fujitsu are aware of. If none
 21 could this be classed in the statement."
 22 Then, if we scroll up, please, we then see
 23 Mr Jenkins' reply and so, looking at this generally,
 24 this puts your knowledge of the Callendar Square bug at
 25 February 2010, correct?

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1 problem. Whilst we're here, did it cause you concern
 2 that Mr Jenkins felt unable to make a statement as to --
 3 if you read, "He is not currently in a position to make
 4 a clear statement" and, if we scroll down, please -- and
 5 again, and again, and again, thank you:
 6 "He is not in a position to make a clear statement
 7 as to whether there are any known problems with the
 8 Horizon system."
 9 Did that cause alarm bells to ring for you?
 10 A. He's not able to deal with it because he can't examine
 11 the logs. Secondly, I think here he's dealing directly
 12 with the defence expert and I think it's in response to
 13 that. So, in that sense, there's an issue but it's
 14 being dealt with. It will be dealt with once he gets
 15 the information he needs to examine it.
 16 Q. Are you saying it didn't ring any alarm bells that your
 17 expert witness felt unable to make a statement whether
 18 there were any known problems with Horizon?
 19 A. This man is a man of -- I think if you look at the
 20 documents, two things. Firstly, he -- it wasn't that
 21 he's an expert, he's an experienced person who knows the
 22 system. Secondly, I think we put the defence on notice
 23 even at the Crown Court on 1 February '10 that he --
 24 we're not going to rely on an expert; we're relying on
 25 a Fujitsu employee who has got the experience and the

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1 knowledge to deal with it, and he's dealing with it.

2 He's dealing with it in the sense that he needs
3 information to be able to address it and, secondly,
4 I think these dealing directly with the defence expert.
5 He's assisting him. So, in that sense -- and, thirdly,
6 I do not -- I didn't have the knowledge to understand
7 what the locking issue was at that time.

8 Sorry, maybe that's a long answer but, just
9 a comprehensive thing as to my understanding from the
10 Inquiry papers when I read them and that's why I'm
11 highlighting to you what I'm highlighting to you now,
12 that I didn't understand what the locking meant.
13 I probably need somebody like Mr Gareth Jenkins or
14 Warwick or Mr Longman to explain that to me, and it he
15 didn't have any alarm bells because he's dealing with
16 it. He will deal with it when he's received the logs.

17 **Q.** I'm not going to pursue that further. That can come
18 down. Do you remember just before the publication of
19 the Second Sight Report in July 2013, you sought out
20 some of the papers concerning your knowledge of the
21 Callendar Square bug?

22 **A.** Yes, my line manager, Hugh Flemington, asked for them
23 because the Company Secretary wanted them.

24 **Q.** Can we look, please, at FUJ00154228, and turn, please,
25 to page 4. Can you see that there's an email here,

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1 the best I could and provided that.

2 **Q.** Was this part of the scrabbling around within the Post
3 Office in the run-up to the publication of the Second
4 Sight Report, to find out what had and had not been
5 disclosed because you knew that Second Sight were going
6 to mention the existence of bugs in Horizon in their
7 report?

8 **A.** No, sir, you're further from the facts. Facts were,
9 there's a working group involved. My line manager asked
10 me, "As and when I needed input from you, or the
11 information I need and you need to be ready to provide
12 it". Company Secretary has asked him to forward certain
13 information, he has asked me to get it, and that's all
14 there is. That is my total involvement in obtaining
15 that. It was nothing untowards on my part. I don't
16 know what he was -- they were looking for, what they
17 wanted. I was asked for certain information, I found
18 it, provided it.

19 **Q.** If we go to the bottom of page 3, please. You reply to
20 him:

21 "What 'Bugs' were referred to or considered in *Misra*
22 or *Castleton* or any other case. Are able to help."

23 Then further up the page, please. His reply:

24 "Jarnail,

25 "The bug that was discussed in both cases related to

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1 seemingly out of nowhere from Mr Jenkins to you on
2 1 July 2013, attaching his witness statement for the
3 *Misra* case?

4 **A.** I don't think it came out from nowhere. I think
5 I emailed him and the Company Secretary, I think, also,
6 in the background, had been in touch with him to find
7 out whether there was any other problems apart from
8 the -- you know, the Falkirk issue.

9 **Q.** What was the context for you asking for a copy of his
10 witness statement for three years previously in July
11 '13?

12 **A.** Because my line manager, Hugh Flemington, asked for it
13 because he'd been asked by the Company Secretary to
14 obtain it.

15 **Q.** But Mrs Misra had been found guilty. She'd served her
16 sentence of imprisonment, the case had been concluded.
17 Why did you need to see the witness statement?

18 **A.** As I said to you, Working Group is working on it. I'd
19 been told, when I request input from you or what
20 I request from you, you provide it, and I did. And he
21 asked and I think he said there's an email chain from
22 the information the Inquiry -- or the papers the Inquiry
23 supplied to me, that she wanted the Head of Legal, Hugh
24 Flemington, and he copied me in and said, "Jarnail can
25 you provide the *Castleton* issue or Falkirk", and I did

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1 a problem found in Callendar Square, Falkirk around 2004
2 as covered in my witness statement in response to it
3 having been raised by the defence expert Professor
4 McLachlan. He was aware of it as it had also been
5 raised by Mr Castleton ... in 2006. I don't know how
6 Mr Castleton was aware of it."

7 So that's all accurate. He rightly says that
8 a single bug was disclosed in *Misra*, only the Callendar
9 Square bug, correct?

10 **A.** Yes.

11 **Q.** Here we're a week before the publication of the Interim
12 Report and a fortnight before the writing of the Simon
13 Clarke Advice. Then if we go up further, please, you
14 reply:

15 "Good afternoon and Thanks.

16 "Are they the two referred to presently. Are you
17 able to pinpoint it in your statement."

18 Then keep scrolling, please:

19 "Please see page 14 ..."

20 That will take you to the Callendar Square bug:

21 "Also attached is the summary from *Castleton* which
22 refers to the problem in point 23", which is also about
23 Callendar Square.

24 Then further up please, and you say:

25 "[Thank you].

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1 "Gareth you said 'The Falkirk bug was first raised
2 in the *Castleton* civil case and was then picked up on
3 for a number of subsequent criminal cases even [though]
4 it was irrelevant to those environments'.
5 "Apart from the *Misra* case, can you give us the
6 names for the other 'subsequent ... cases' he refers to
7 ..."
8 Why were you, at this stage, not revealing your
9 knowledge of the receipts and payments mismatch bug when
10 there's this detailed investigation into the revelation
11 of the Falkirk bug.
12 **A.** Because I didn't know about them. Like I told you
13 before, that was the only issue I knew about and that's
14 what this is about. The person who would know would
15 have been Fujitsu and the contact we had was Gareth
16 Jenkins, and that's why we referred to him for
17 information, and that's what I'd been asked to do;
18 that's what I've done.
19 **Q.** Can we go forwards to POL00031352 and turn to page 3 at
20 the bottom, please. This starts off with an email chain
21 that ends up with you but, to start with, doesn't
22 include you.
23 **A.** No.
24 **Q.** Mr Baker to Gareth Jenkins, the Chief Information
25 Officer and the Company Secretary:

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1 *Castleton* case (I wasn't personally involved). It was
2 definitely spoken about in the *Misra* case where it was
3 interrogated about at length. Other cases where it was
4 mentioned were settled out of court as far as I know."
5 Then scroll up more, please, and stop there.
6 I think here Alwen Lyons says:
7 "Thanks Gareth can we get the witness statement for
8 *Castleton* please Hugh Thanks Alwen."
9 Then Hugh Flemington says:
10 "... can you get the ... case details please as
11 Alwen has asked for."
12 Is that what led to you sending that email or
13 speaking to Mr Jenkins, asking for a copy of his witness
14 statement?
15 **A.** I think -- yeah --
16 **Q.** So --
17 **A.** Yeah, I -- I'm trying to think. Yes. Yes.
18 **Q.** Okay. So Ms Lyons is saying, "Can we get the witness
19 statement for *Castleton* please", yes?
20 **A.** Yes.
21 **Q.** You can see the heading of the email is still called,
22 "Discuss [ie discussion] of defects in Horizon in
23 court", yes?
24 **A.** Yes.
25 **Q.** Then go to page 1, please. This is your reply, if we

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1 "Gareth
2 "You mention discussing the Falkirk bug in the *Misra*
3 case today, are there any other examples where bugs have
4 been discussed in court."
5 I should say that the heading of that email is,
6 "Discuss of defect in Horizon in court", yes?
7 **A.** Yes.
8 **Q.** Then if we scroll up, please, Mr Jenkins replies:
9 "I'm not aware of any other specific bugs being
10 discussed in court (either related to [Legacy] Horizon
11 or [Horizon Online]).
12 "The Falkirk bug was first raised in the *Castleton*
13 civil case and was then picked up on for a number of
14 subsequent criminal cases even though it was irrelevant
15 to those environments. Dense experts were using it as
16 an example that Horizon has had bugs."
17 Then, further up, please. Alwen Lyons -- sorry,
18 just go back.
19 Alwen Lyons said:
20 "The question was really about whether the defect
21 had been spoken about in open court other than in the
22 *Misra* case as it helps that it was in the public domain
23 and not 'covered up' in any way."
24 Then scroll up, please. Mr Jenkins says:
25 "I understand the bug was spoken about in the

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1 scroll down to the foot of the page: Jarnail Singh,
2 Criminal Lawyer, yes?
3 **A.** Yes.
4 **Q.** Then go to the top of the page, please, and then keep
5 going, still dated 1 July 2013. You see you've changed
6 the heading to the email.
7 **A.** Because it's a post and paste, I think from --
8 **Q.** Sorry?
9 **A.** It's post and paste. Post and paste from counsel's
10 advice pinning or write up on the *Castleton* and the, you
11 know, the issues in *Misra*, I think.
12 **Q.** You'd been asked to provide a copy of the witness
13 statement of Mr Jenkins, hadn't you?
14 **A.** I don't know --
15 **Q.** Sorry, the witness statement in the *Castleton* case.
16 **A.** *Castleton*, I think we -- I got Bond Dickinson to deal
17 with it because is it civil case? I don't know whether
18 I had anything. The only thing I had in relation to
19 *Castleton* was the -- him being mentioned and discussed
20 and dealt with.
21 **Q.** Sorry, let's go back to page 2, then:
22 "Thanks Gareth can we get the witness statement for
23 *Castleton* please Hugh ..."
24 Then to you:
25 "Jarnail -- can you get *Castleton* case details

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1 please."

2 Yes? This all about *Castleton*, isn't it?

3 **A.** Yes.

4 **Q.** Then we go to page 1. Suddenly you're talking about

5 Seema Misra?

6 **A.** Because the only case I know of where *Castleton* has been

7 mentioned and discussed and dealt with is the *Misra*

8 case. I don't know anything about it. I don't know

9 anything about the *Castleton* case because I think it was

10 a civil matter, from my recollection, and I think it's

11 Mr Tatford I think who did the review because of the

12 whatever he was dealing -- we were dealing with at that

13 time.

14 But the only information I had is, as far as the

15 *Castleton* is concerned, is here and I think I asked Bond

16 Dickinson for statement to provide them, whether they

17 did or not I don't know, but then that's the only thing

18 I had and I provided it.

19 **Q.** So you were asked to provide the witness statement in

20 Lee Castleton's case, and you say:

21 "In criminal trials both the prosecution and defence

22 put their case to the jury. Who make a decision 'beyond

23 reasonable doubt' on finding the defendant guilty, jury

24 do not give reasons for their verdict and it is not

25 possible to ask the jury the basis and details on which

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1 "5. The most significant case reviewed was that of

2 Lee Castleton (civil case only). He brought a civil

3 action alleging deficiencies in the Horizon system. He,

4 unlike any other subpostmaster, was prepared to be

5 specific about some of the problems he claimed to have

6 encountered. His claims were utterly refuted in the

7 written judgment of the case. The judgment explains in

8 detail why Mr Castleton's allegations were rejected. It

9 provides a rigorous analysis that is woefully absent

10 from the vague and illogical complaints about Horizon

11 that are reported in some sections of the media. The

12 judgment referred briefly to a real computer problem

13 that emerged at Callendar Square office in Falkirk.

14 Gareth Jenkins to investigate this problem. He provided

15 a detailed summary of the problem in his witness

16 statement [page 14, of 9 March 2010]. He also explained

17 in that statement why he concluded it was irrelevant to

18 Mrs Misra's case."

19 You took it upon yourself here to provide

20 an explanation to a wide readership which sought to

21 justify the jury's verdict in *Misra*, didn't you?

22 **A.** No, that wasn't the case. I think I discussed it with

23 Hugh Flemington, Head of Legal, and I explained to him:

24 look, I don't know where to get the statement but the

25 only thing I have got of any relevance is this", and

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1 they make their decision. On occasion particular point

2 can be inferred.

3 "This is the only criminal trial where a jury has

4 been required to consider in detail the integrity of the

5 Horizon System.

6 "1. Seema Misra was subpostmistress at West

7 Byfleet. She was accused of stealing £74,000-odd

8 between 2005 and 2008. On 21/10/10, after a 7 day

9 trial, she was found guilty of the jury of the theft.

10 "2. Mrs Misra claimed that, although she was guilty

11 of false accounting, she had not stolen the money whose

12 loss she had concealed. She suggested that one possible

13 reason why the money appeared to be missing might be

14 computer error. The jury heard from expert witnesses

15 for the Crown and the defence. Their evidence was

16 sufficiently detailed as to have lasted two full days.

17 The jury's verdict showed that it was sure that computer

18 error played no [part] in the case. There has been no

19 appeal against conviction.

20 "3. We instructed our own expert, Gareth Jenkins,

21 from Fujitsu. This was a turning point in the case."

22 Skipping to 4:

23 "In his evidence to the jury Professor McLachlan

24 conceded that all of the theoretical problems he had

25 raised were now irrelevant ...

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1 I showed it to him and I said, "Well, what do you want

2 me to do?", and he said, "Well, send it to me and I'll

3 get it sorted or I'll get" -- I don't know, somebody

4 called Parsons at Bond Dickinson -- "to provide it if

5 they -- they may have it". I said, "Well, look,

6 I certainly haven't. I don't even know where to get it

7 from".

8 And he said, "Well, just sent me that and see what

9 I can -- maybe, you know, you can discuss it and forward

10 it on". But there wasn't, there was nothing like what

11 you're suggesting at all. There --

12 **Q.** You were seeking to justify --

13 **A.** No, no.

14 **Q.** -- why the jury's verdict was a vindication of Horizon,

15 weren't you?

16 **A.** No, not at all. That's the only information I had with

17 regard to *Castleton* civil case. As I say, clearly, it's

18 a civil case only, and I've discussed it with him, and

19 said, "Hugh, look, that's all have. What did you want

20 me to do?", and he said, "Well look, send what you

21 have", and I have.

22 **Q.** You have been asked to provide a copy of a witness

23 statement in the *Castleton* case and you provided

24 a detailed narrative about the *Misra* case, didn't you?

25 **A.** No, because that's the only information I had and

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1 I asked him "Was it relevant? Do you want me to send it
 2 or what do you want me to do?" And he said "Just send
 3 it as it is", and I did.
 4 **Q.** You started to understand, didn't you, that the *Misra*
 5 case was going to be a problem for you, didn't you?
 6 **A.** It wasn't a problem for me because I wasn't dealing with
 7 it. The problem was in the -- as I say, the way we find
 8 ourselves where we are, obviously, you know, I'm grieved
 9 that she had to suffer the pain that her and the family
 10 had to suffer, and it was doubly -- I'm grieved, in the
 11 sense that there was mistakes being made and she had to
 12 go through it.
 13 That is what I'm feeling today and I always felt
 14 when the Court of Appeal decided, rightly, what they
 15 did, the mistakes were made, I made the mistakes. We
 16 didn't have the systems and procedures and, certainly,
 17 on various stages, I wanted to drop the case and it was
 18 a decision made by Head of Criminal Law, Rob Wilson, to
 19 proceed with it. That is what it is. It is not what
 20 you are suggesting.
 21 **Q.** You knew, Mr Singh --
 22 **A.** No.
 23 **Q.** -- didn't you, that your knowledge of the receipts and
 24 payments mismatch bug was going to come under scrutiny
 25 and what you were doing here, having been asked to

1 "Second Sight Review -- Bond Dickinson."
 2 Then over the page:
 3 "Fujitsu -- Bond Dickinson/Cartwright King
 4 "[Cartwright King] has raised an issue concerning
 5 Horizon evidence presented by Fujitsu during the
 6 criminal trials."
 7 So you knew, by this time, that Cartwright King had
 8 focused on and were centring upon the issue of the
 9 evidence provided by Fujitsu in the course of criminal
 10 trials, didn't you?
 11 **A.** No.
 12 **Q.** What did you understand that sentence to mean?
 13 **A.** As I say, I don't remember coming across this, just --
 14 was that with my Inquiry's bundle papers? I don't
 15 remember that.
 16 **Q.** You agree that that's what it suggests on its face, that
 17 Cartwright King are raising issues about the evidence
 18 presented by Fujitsu in the course of criminal trials?
 19 **A.** Well, that's what it says but, at that time, that didn't
 20 occur to me purely because whatever you're suggesting is
 21 not true. I didn't know about that --
 22 **Q.** I haven't suggested anything yet --
 23 **A.** Well, suggesting --
 24 **Q.** -- but it's nice to know that you think it would be not
 25 true.

1 provide a copy of the witness statement in *Castleton*,
 2 was to try to stand up to show why the result in the
 3 Seema Misra case was a good one?
 4 **A.** Absolutely not. Not true.
 5 **Q.** Can we move on, please, to POL00297710. This is,
 6 essentially, a state of play email sent to you on
 7 13 July 2013. So this is between Second Sight Interim
 8 Report and Simon Clarke Advice. If we scroll down,
 9 please -- in fact, just read it to yourself as we scroll
 10 down. So go back to the top, please. So it's
 11 an overview of where we are, sent by Rob Wilson.
 12 "Criminal Law", these are the people dealing with the
 13 criminal law; "Civil Law", these are the people dealing
 14 with civil law; "Media Law", these are the people
 15 dealing with the media law aspects of the case;
 16 "Issues":
 17 "Current and Historic Criminal Case Review --
 18 Cartwright King
 19 "Review is now considering pre-separation cases."
 20 "[Cartwright King] notifying [Post Office] of cases
 21 where further disclosure is required as they are
 22 identified.
 23 "Next conference call [on Wednesday, the 17th]
 24 "Bond Dickinson to attend talk to facilitate
 25 co-ordination ...

1 **A.** Well, you know, okay, fine.
 2 **Q.** Is that your default position, when coming to give
 3 evidence in answer to the questions from Counsel to the
 4 Inquiry: if he suggests things, they're not true?
 5 **A.** Well, no, I'm trying to listen to you, trying to
 6 understand where you're going but I --
 7 **Q.** So why did you say "What you're suggesting is not true",
 8 when I hadn't made a suggestion?
 9 **A.** Well, okay, make the suggestion then.
 10 **Q.** Thank you, Mr Singh. If we move on to the next
 11 paragraph, "New Horizon Expert":
 12 "Hugh emailed new Fujitsu contact -- Torstein
 13 Godeseth ...
 14 "[Cartwright King] to arrange to meet [Torstein
 15 Godeseth]
 16 "Andy Parsons, [Bond Dickinson] progressing new
 17 independent expert."
 18 You were aware, at least by the date of this email,
 19 weren't you, of the key consequence arising from it, the
 20 need to find a new expert witness?
 21 **A.** I don't know what you're -- I don't understand what
 22 you're telling me or asking me.
 23 **Q.** On reading this email, you would have been aware of the
 24 need to find a new Horizon expert, wouldn't you?
 25 **A.** What's the -- I don't -- I don't know. I mean, I'm not

1 involved in -- I'm not a decision maker. I don't make
 2 the decisions as to what goes on. I don't know what
 3 you're suggesting or what you want me to answer. What
 4 is your question? I mean, I don't understand it.

5 **Q.** By the time of this email, you would have been aware of
 6 the need to find a new expert on Horizon, wouldn't you?

7 **A.** What's the -- as I said to you, I don't -- wasn't
 8 involved in this. The only time I think a new
 9 independent expert had been suggested was subsequently
 10 by counsel, legal counsel -- Post Office's counsel
 11 Susan, I think, some later stage, but I'm not aware of
 12 the independency of the expert or anything of that
 13 nature at that stage. I don't -- I wasn't involved in
 14 it. No.

15 **Q.** Can we move forward to Mr Clarke's Advice of 15 July,
 16 please. POL00006357. This is Mr Clarke's Advice of
 17 15 July and, if we can go forwards, please, to
 18 paragraph 38 -- sorry, I haven't got a note of the page
 19 number. Sorry, if we just stop there.

20 This is where he sets out "Discussion", and if we
 21 just scroll slowly down, please. Then keep going,
 22 please. Stop there:

23 "By reason of the matters stated ... it may
 24 reasonably be suggested that the conclusions set out
 25 immediately below are established:

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1 "Accordingly his credibility as an expert witness is
 2 fatally undermined. He shouldn't be asked to provide
 3 expert evidence in any current or future prosecution.

4 "Similarly, in those current and ongoing cases where
 5 Dr Jenkins has provided an expert witness statement, he
 6 should not be called upon to give that evidence ... we
 7 should seek a different independent expert to fulfil
 8 that role.

9 "Notwithstanding the failure is that of Dr Jennings
 10 and, arguably, of Fujitsu. This failure has a profound
 11 effect upon [Post Office and its prosecutions], not
 12 least by reason of Dr Jenkins' failure, material which
 13 should have been disclosed to defendants was not
 14 disclosed, thereby placing [the Post Office] in breach
 15 of their duty as a prosecutor.

16 "By reason of that failure to disclose, there are
 17 now a number of convicted defendants to whom the
 18 existence of bugs should have been disclosed and was
 19 not."

20 Then reading on:

21 "... there are also a number of current cases where
 22 there has been no disclosure where there ought to have
 23 been."

24 Just stopping there, in your witness statement to
 25 the Inquiry, you say that you read this advice and you

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1 "Since September 2010 Horizon Online had suffered at
 2 least two defects, or bugs. One appears to have been
 3 resolved in early 2011; the other remained extant until
 4 at least January 2013 and, on one account, will not be
 5 remedied until October 2013.

6 "Dr Jenkins informed the Second Sight committee of
 7 the existence of the two bugs within the 12 months
 8 preceding publication of their Interim Report.
 9 Accordingly, Dr Jenkins knew of the bugs, their history
 10 and resolution during the period 5 October and 3 April."

11 If we scroll down -- in fact, no need to read this,
 12 just keep going, please, and over the page, and over the
 13 page:

14 "Conclusions

15 "What does all this mean? ... it means that
 16 Dr Jennings has not complied with his duties to the
 17 court, the prosecution or the defence."

18 Then 38:

19 "The reasons why Dr Jenkins failed to comply with
 20 this duty are beyond the scope of this review."

21 However this is the position:

22 "[1] Dr Jenkins failed to disclose material known
 23 to him but which undermines his expert opinion. This
 24 failure is in plain breach of his duty as an expert
 25 witness.

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1 agreed with it. You say:

2 "I believe I agreed with Simon Clarke's Advice on
 3 these matters."

4 **A.** Well, he -- he's a senior, knowledgeable, experienced
 5 practitioner. He's reviewed the papers, he's got
 6 the papers, more information than anybody, he's advised
 7 on it. Why would I disagree with it?

8 **Q.** But you say in your witness statement you agreed with
 9 the advice?

10 **A.** Agreed?

11 **Q.** Yes.

12 **A.** Yes. Well, I've read it. I mean, agreed in the sense
 13 that it's right. I mean, if he's a discredited witness
 14 who's not given true evidence to the court, how can you
 15 actually use him?

16 **Q.** So if we just go back up to paragraph 38, then:

17 "The reasons as to why [Gareth Jenkins] failed to
 18 comply with his duty are beyond the scope of this
 19 review."

20 Do you agree that you were one of the very people
 21 capable of addressing the reasons why Gareth Jenkins may
 22 not have discharged his duties of disclosure?

23 **A.** No. I -- no, that wasn't the case.

24 **Q.** Do you agree you were one of the very people capable of
 25 addressing the reasons why Mr Jenkins may not have

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1 discharged his duties of disclosure because you had not
 2 told him about those duties?
 3 **A.** That is true but, like I tried to explain to you in the
 4 last time I gave evidence, he came in as an experienced
 5 person who came to assist the defence expert. We'd
 6 notified the court and the defence, who accepted that we
 7 weren't going to rely on expert but a Fujitsu employee.
 8 There was no person within the Post Office that we
 9 had -- you know, as to how to instruct an expert. We
 10 probably made mistakes and there was -- somewhere along
 11 the line somebody should have realised, and probably me,
 12 Rob Wilson and Mr Tatford, that he is an expert now, we
 13 should have notified him of his obligations, and we
 14 failed in that. I agree on that, yes.
 15 **Q.** Before saying to yourself, "I agree with this man's
 16 advice", did you think you should explain to anyone that
 17 you never gave Mr Jenkins any compliant written expert
 18 instructions?
 19 **A.** It didn't come to light. Like I said to you, it was one
 20 of those cases where nobody picked it up. I mean,
 21 you've got somebody like Mr Tatford, who is --
 22 **Q.** Mr Singh, sorry to speak over you. We've moved on now
 23 and somebody has picked it up, and I'm asking what was
 24 done in response to somebody picking it up?
 25 **A.** I don't know. I mean, I don't recall. I mean, I don't

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1 highlight it to the people that are dealing with it,
 2 because these advices are now for the senior people,
 3 you've got Mr Flemington and Ms Crichton. This is for
 4 them.
 5 I mean, I think we just get it secondhand or they
 6 pass it on, the advice. I don't know when I got it or
 7 when I looked at it and, certainly --
 8 **Q.** Mr Singh, this advice is criticising, in very strong
 9 terms, Gareth Jenkins for not giving disclosure of,
 10 amongst other things, the receipts and payments mismatch
 11 bug, yes?
 12 **A.** I don't know what -- well, certainly criticising in the
 13 sense that he wasn't told of his obligations because we
 14 didn't understand the obligations ourselves.
 15 **Q.** I'm not going to go over it again. What Mr Clarke does
 16 is he highlights the passages from the Second Sight
 17 Report, which disclose the two bugs, one of which is
 18 receipts and payments mismatch.
 19 **A.** Mm-hm.
 20 **Q.** He then says, "It's clear that Gareth Jenkins knew about
 21 those and he failed to give disclosure of them", yes?
 22 **A.** I don't --
 23 **Q.** Then it comes to this part. It says:
 24 "The reasons [why he] failed to comply with these
 25 duties are beyond the scope", but the consequences are

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1 recall -- I know there was -- obviously Mr -- the
 2 Cartwright King picked it up but it didn't occur to me.
 3 I don't know what happened because, at that time,
 4 I think the reviews were taking place and I was told,
 5 because of the matters I'd been involved in, previous
 6 prosecution while part of the Criminal Law Team, they
 7 want to keep an independency of it, I should keep away
 8 from the reviews or anything that's happening
 9 surrounding it, and I did.
 10 **Q.** Before simply saying, "I agree with this advice", did
 11 you think that you ought to say to somebody, whether
 12 Cartwright King or otherwise, "I hadn't explained to
 13 Mr Jenkins his duty as an expert to give disclosure"?
 14 **A.** I mean, I probably didn't get the training, supervision
 15 or whatever you like to call it. Maybe I wasn't well
 16 versed with what the expert witness obligations were or
 17 how we were meant to deal with it. Certainly, it is
 18 a failing or mistake on my part, I accept, but we didn't
 19 have the systems and procedures in place to deal with
 20 it, and that's why we, as a team, fell on.
 21 We should have been explained, maybe it's something
 22 that we should have dealt with appropriately right from
 23 the outset. Nobody picked it up and, certainly, here,
 24 I would have thought that somebody at Cartwright King,
 25 who are the criminal law specialist, would be able to

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1 as follows, yes?
 2 **A.** Yes.
 3 **Q.** Did you not think, "Hold on, Mr Jenkins did tell us
 4 about the receipts and payments mismatch bug. I got
 5 sent an email containing his report about it on the
 6 Friday before trial and I sat on it"?
 7 **A.** I did not receive it, I didn't read it. I didn't print
 8 it. Like I told you, that's my evidence, and it didn't
 9 occur to me because it was the senior team dealing with
 10 it and I was told to keep away from it, purely because
 11 of the cases being reviewed were the old Royal Mail
 12 Group cases.
 13 **Q.** We see lots of investigation about what did we know
 14 about Falkirk, we see lots of investigation about what
 15 did we know about the local suspense account, why is
 16 there not a similar inward-looking approach about "What
 17 did we, in particular, what did Jarnail Singh, know
 18 about the receipts and payments mismatch bug"?
 19 **A.** I think that's a question for the senior Legal Team and
 20 Cartwright King because they're dealing with it.
 21 Because, at that stage, my role was completely
 22 different. My role was basically in between the Post
 23 Office Limited and Cartwright King and, as and when my
 24 line manager, Hugh Flemington, needed input or specific
 25 advice. That's --

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1 Q. On the last occasion we addressed your refusal of
 2 defence requests for information about system faults in
 3 the course of the *Seema Misra* prosecution, yes?
 4 A. I don't know which specific bit --
 5 Q. They wrote to you, Issy Hogg wrote to you and said, "Can
 6 we have details of known system faults?"
 7 A. I don't recall.
 8 Q. I'm not going to go back over the transcript of the last
 9 occasion.
 10 A. No --
 11 Q. You'd refused disclosure of the Known Error Log, hadn't
 12 you?
 13 A. I didn't refuse anything. I mean, the way it was dealt,
 14 they came in, and it was looked at by Mr Tatford,
 15 Mr Longman, Rob Wilson and it was just the logs, I think
 16 we had problem with, because the relationship --
 17 commercial relationship or the contractual relationship
 18 between the Post Office and Fujitsu. I mean, that's
 19 nothing within my control. If it was within my --
 20 I first experience I've had of obtaining those logs were
 21 in the *Misra* case, because I've not dealt with any other
 22 cases. I didn't understand any of the other issues or
 23 problems regarding the problems with dealing with here,
 24 because I had no experience. That was the first time
 25 I came in to a lot of these documents. So I don't

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1 can see from the email from 5 February '10, from
 2 Mr Jones, the Head of -- Fujitsu, and Issy Hogg.
 3 I mean, she was only glad that you had somebody like
 4 that to explain the unique Horizon system to their
 5 expert. So --
 6 Q. Mr Singh, did you adopt a strategy of lumping this all
 7 on to Mr Jenkins?
 8 A. No, absolutely not. I mean, I didn't lump anything on
 9 anybody. I mean, my thought was that -- mistake was
 10 that I did not pass this case on to somebody more
 11 experienced like Rob Wilson but Rob Wilson reassured me
 12 "I'm there in the background as and when you need me,
 13 I'm the decision maker, as and when you need something,
 14 come to me and I will deal with it". And you had
 15 somebody experienced like Mr Tatford, who was
 16 an experienced independent barrister, who dealt with
 17 these cases for the Post Office and Royal Mail Group, on
 18 a number of years -- for a number of years.

19 You've got Mr Longman, who has dealt with Fujitsu as
 20 to obtaining those information, but it's my, you know,
 21 my -- I'm a lawyer in the case. I should have been able
 22 to instruct him in a proper way at some stage when
 23 I found out that it should have been done, but I -- it
 24 was overlooked because nobody picked it up. And I think
 25 even it went to court --

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1 really quite understand what you're asking of me or what
 2 you want me to reply to you.
 3 Q. You knew that Mr Jenkins wasn't a professional expert
 4 witness, didn't you?
 5 A. Yes.
 6 Q. You knew --
 7 A. Experienced person --
 8 Q. -- that he had very little experience of giving evidence
 9 in court?
 10 A. I didn't know that because he was actually dealing with
 11 a lot of the interim reports from the defence expert,
 12 plus, I think, Rob Wilson, I think, had dealt with him
 13 on a number of occasions, not in court but certainly as
 14 far as obtaining information or witness statements,
 15 because he was the one who actually somewhere said,
 16 well, look, you know -- who suggested him, I think,
 17 somewhere along the line. But I -- it was my first
 18 experience of dealing with an expert and, as I say, the
 19 first time I'd dealt with anything of that nature --
 20 last time I dealt with anything of that nature was
 21 probably about 20-odd years ago, in 1989/90, when I was
 22 working in private practice.
 23 But it obviously is a mistake on my part that
 24 I should have been more aware as to what the expert
 25 duties are. He came in as an experienced person, as you

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1 Q. Mr Singh, all I'm asking is: this is somebody picking it
 2 up and what you didn't do was say, "Hold on, Post Office
 3 is at fault here too. I'm at fault here too". What you
 4 did is you covered up your own knowledge of the receipts
 5 and payments mismatch bug and let the false narrative
 6 continue that Mr Jenkins had not given disclosure of it,
 7 didn't you?
 8 A. No. No, no, that's further from the truth. That's
 9 not -- that's not the case.

10 MR BEER: Sir, can we take the second break until 12.15,
 11 please?

12 SIR WYN WILLIAMS: Yes, we can.

13 MR BEER: Thank you, sir.

14 (12.04 pm)

(A short break)

16 (12.15 pm)

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

18 SIR WYN WILLIAMS: Yes, thank you, yes.

19 MR BEER: Thank you.

20 Mr Singh, can we start by looking at POL00155555.
 21 These are notes of Rodric Williams, dated 2 September
 22 2013, you can see the date on the right-hand side.

23 A. Yes, I can.

24 Q. Mr Williams has told us that these are his notes in
 25 which he recorded a conversation with Martin Smith of

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1 Cartwright King, of that date, okay?

2 A. Yes, yes.

3 Q. Can we look at the bottom left-hand side, please, and

4 keep going, please. On the left-hand side, it says

5 "M Smith", and then, under the first arrow:

6 "Don't think he's ever been advised of his duties."

7 Then, on the right-hand side, in the box, second

8 line in:

9 "What were we doing to instruct GJ", which

10 Mr Williams told us meant Gareth Jenkins.

11 So on the left-hand side, Mr Williams told us that

12 this was a reference to Gareth Jenkins, "Don't think

13 he's ever been advised of his duties".

14 Did Mr Smith ever discuss with you whether

15 Mr Jenkins had been properly advised of his duties?

16 A. Sorry, can you repeat that again?

17 Q. Did Mr Smith ever discuss with you whether Mr Jenkins

18 had been properly advised of his duties?

19 A. I don't recollect him -- having that discussion.

20 I don't think he told me, no.

21 Q. Did Mr Williams raise the matter with you?

22 A. I don't think so. I don't recall but I don't think so.

23 Q. Did either of them suggest to you that Mr Jenkins had

24 not been ever advised of his duties?

25 A. I don't recall. No, I don't think so but I don't

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1 "What were we doing to instruct Gareth Jenkins?"

2 A. Sorry, what's the date of this?

3 Q. 2 September, so a week before the conference. Was this

4 never raised with you? You're the solicitor in the

5 case --

6 A. I don't think so --

7 Q. -- in the *Misra* case, at which Mr Jenkins gave evidence

8 in court?

9 A. Yeah, well, I mean, the only thing I heard was that was

10 he was -- this is the only trial where he's actually

11 given evidence. I know Cartwright King --

12 Q. It was unique for that reason, wasn't it?

13 A. I know Cartwright King were using him but I had lost

14 contact then, because they, you know, they -- all the

15 work was outsourced to them and, certainly, Mr Williams

16 was busy doing his thing. I don't recall anybody coming

17 up to me and saying, "Look, you didn't instruct him

18 properly", or, "You didn't explain his obligations to

19 him". I don't recall that, no.

20 Q. Was it the case that this was the truth that dare not be

21 spoken, that "We, the Post Office, are implicated in

22 this too"?

23 A. Maybe the Post Office is but -- I mean, I don't know

24 about the Post Office but certainly I wasn't thinking

25 like that. No.

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1 recall. I mean --

2 Q. Was it relayed back to you that Cartwright King appeared

3 to have taken the view that Mr Jenkins had never been

4 advised of his expert duties?

5 A. I don't recall having that conversations with them.

6 Q. Was that a matter not more widely discussed within the

7 Post Office, to your knowledge?

8 A. Not to my knowledge.

9 Q. Was it a matter raised with or discussed with Mr Altman,

10 King's Counsel?

11 A. I don't recall. I mean, I don't remember it. I mean,

12 he may have done but I didn't brief Mr Altman. Bond

13 Dickinson always did, and they provided the papers.

14 Q. You were present at a conference with him, weren't you?

15 A. Yeah, in September, yeah.

16 Q. On 9 September, I think --

17 A. Yes.

18 Q. -- 2013?

19 A. Yes.

20 Q. What we've seen so far is Mr Clarke saying that

21 Mr Jenkins is at fault for all of these things. We've

22 got a note here on 2 September 2013, with Cartwright

23 King seemingly saying, "We don't think Gareth Jenkins

24 has ever been advised of his duties", and Mr Williams

25 writing an internal rhetorical question:

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1 Q. Why weren't you thinking like that?

2 A. Well, as I said to you, it is -- it was a strange sort

3 of set up. My role was basically, as you said,

4 a postbox. I relayed information from one place to

5 another. I wasn't really involved in this heavyweight

6 litigation: Cartwright King on the one side and you had

7 Bond Dickinson on the other, and you had the Post Office

8 in the middle instructing one or the other. So I --

9 nobody raised it with me. Nobody. Even my line manager

10 never mentioned it, to my knowledge, to -- but certainly

11 I don't recall anybody discussing it, no.

12 Q. Thank you. That can come down.

13 Can I move to my second topic, then, which is the

14 shredding of documents. We've heard a significant

15 amount of evidence in relation to the circumstances in

16 which Mr Simon Clarke came to write his so-called

17 shredding advice on 2 August 2013, and so I'm going to

18 be targeted in my questions to you.

19 Can I start, please, with the conversation that

20 began this and can we look at paragraph 55 of your

21 second witness statement, please.

22 A. Sorry, Mr Beer, can I just have five minutes? My eyes

23 are -- sir, can I -- I've got a problem with my eyes.

24 SIR WYN WILLIAMS: If you want a five-minute break,

25 Mr Singh, please have one.

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1 **THE WITNESS:** Yeah, please.
 2 Sorry about that, Mr Beer, sorry.
 3 **SIR WYN WILLIAMS:** I think the best thing is if you leave
 4 the hearing room, Mr Singh. Everybody else should wait
 5 in the hearing room for five minutes and, if that
 6 doesn't prove to be enough, then we'll take it from
 7 there but, for the moment, you leave and have a short
 8 break and then Mr Beer will reconnect with me in five
 9 minutes and tell me what's --
 10 **THE WITNESS:** Thank you.
 11 **MR BEER:** Thank you, sir.
 12 (12.22 pm)
 13 (A short break)
 14 (12.28 pm)
 15 **MR BEER:** Sir, can you see and hear us?
 16 **SIR WYN WILLIAMS:** Yes, thank you.
 17 **MR BEER:** Thank you very much.
 18 Mr Singh, we were going to look at paragraph 55 of
 19 your second witness statement, which is on page 20.
 20 It's up on the screen for you. Just the context is
 21 there had been the Wednesday weekly hub meetings set up.
 22 I think you say earlier that you weren't involved in
 23 setting them up, you weren't present on the first one,
 24 on 19 July, you did attend on 24 July 2013 and,
 25 paragraph 55, the third meeting, you say:
 93

1 the minutes should be shredded and, for the future, they
 2 should be scrapped?
 3 **A.** I don't know, all I know is that he came, he was a bit
 4 upset and said sort of, "Can I speak to you?" I said,
 5 "Certainly, David, not a problem".
 6 Then he said, "Look, we've been told by John Scott
 7 to shred" -- sorry, "scrap and shred minutes".
 8 **Q.** Were both of those things mentioned? One, you'll
 9 appreciate, is backwards looking, ie "shred what we've
 10 got" --
 11 **A.** Yes.
 12 **Q.** -- and the other is forward looking, that "We're going
 13 to scrap", ie not do, "the minute taking in the future"?
 14 **A.** I think so. I mean, I can't tell you, you know, I don't
 15 know, 10 years on, but I certainly got Martin Smith --
 16 basically I quoted Mr Posnett to him, and said "Look,
 17 Martin, do you want to speak" --
 18 **Q.** I'm going to come in a moment to what happened later --
 19 **A.** Sorry, yeah.
 20 **Q.** -- when you spoke to Martin Smith.
 21 **A.** Yes.
 22 **Q.** I'm just trying to understand from this evidence whether
 23 it's two things: one looking backwards and one looking
 24 forwards?
 25 **A.** Yeah, he mentioned both, yes.
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1 "I recall after the weekly meeting on 31 July, which
 2 [you] believe took place in the morning, Dave Posnett
 3 came to see me. [He] was seeking my guidance because he
 4 said that John Scott had instructed him that typed
 5 minutes of the weekly calls should be scrapped and/or
 6 shredded. I immediately felt very uncomfortable and
 7 I told Dave Posnett very clearly that he must not do
 8 that and he should tell John Scott the same.
 9 I recognised that this was a serious issue and I called
 10 Martin Smith at [Cartwright King]. I think I might have
 11 even have done this when Dave Posnett was print so that
 12 he could talk to Martin Smith if needed, but I am not
 13 certain of this. In any event I relayed word for word
 14 what Dave Posnett had told me and I believe Martin
 15 Smith's recorded is an accurate note. I believe I also
 16 spoke with Hugh Flemington about this but this might not
 17 have been on the same day."
 18 So that's your recollection of the conversation with
 19 Mr Posnett and what you did as a result, yes?
 20 **A.** Yes.
 21 **Q.** So what Mr Posnett told you, we can see from the fourth
 22 line, is that Mr Scott had instructed that:
 23 "... minutes of the weekly calls should be scrapped
 24 and/or shredded."
 25 What was the context of that, that, for the past,
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1 **Q.** Thank you. Presumably that suggestion was deeply
 2 concerning to you?
 3 **A.** Yes, of course. I was really uncomfortable --
 4 **Q.** Probably more than uncomfortable because, I mean, if
 5 I can help you, the context, would this be right, would
 6 be the discussions concerned Horizon faults, and touched
 7 upon possible non-disclosure of Horizon faults in past
 8 criminal proceedings, and the instruction was being
 9 given by the Head of Security, whose department had led
 10 on prosecution of subpostmasters?
 11 **A.** Yes. Certainly, yes.
 12 **Q.** You could add a third thing, another context, that this
 13 time it was still the Head of Security, John Scott,
 14 making decisions on prosecutions, wasn't it?
 15 **A.** From what I recall, yes. Yes, he was.
 16 **Q.** So those three things -- we're looking at past
 17 non-disclosure in criminal proceedings; the instructions
 18 being given by the Head of Security, who's responsible
 19 for criminal proceedings; and he's the current decision
 20 maker -- that would make this kind of instruction very
 21 serious, wouldn't it?
 22 **A.** That's the reason why I told David, "You must not do
 23 it." I don't know, I probably swore at him, to be
 24 honest with you and said, "What are you doing and what
 25 are you thinking?" But I didn't -- you know, I didn't
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1 quote him on that. But, yes, I mean it was serious.
 2 I mean, there's all sorts of things come off it, you
 3 know, there could have been all sorts of consequences.
 4 And that's probably why it prompted me to phone Martin
 5 there and then, so he could speak to David straight --
 6 you know, there and then.

7 **Q.** You say three to four lines from the end:

8 "In any event I relayed word for word what Dave
 9 Posnett had told me and I believe Martin Smith's record
 10 is an accurate note."

11 I'm just going to see which record you're referring
 12 to there, where you say, "I believe Martin Smith's
 13 record is an accurate note". POL00139745.

14 This is his note of that call at 6.00pm on 31 July.
 15 Is this the note you were referring to as being
 16 an accurate record?

17 **A.** I think more of Simon Clarke's Advice, I think.

18 **Q.** It's just in your witness statement, you said that
 19 Martin Smith's record is an accurate one?

20 **A.** I think that's not really -- that just says scrapped,
 21 but I think the conversation is a little bit more than
 22 that, there was certainly shredding, and probably --

23 **Q.** You see this, under the detail, says:

24 "Discussing disclosure issues: J Scott has
 25 instructed that type minutes be scrapped."

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1 then it isn't?

2 **A.** I think I said, "Where's that coming from?" or something
 3 like that and he said "Oh, Bond Dickinson are suggesting
 4 or advising on that".

5 **Q.** That's slightly different. My question is exactly what
 6 you just asked of yourself there, where is this coming
 7 from? Is this coming from Mr Scott through Mr Posnett
 8 or, is it, as you just suggested, coming from Bond
 9 Dickinson?

10 **A.** I think -- I said, well, look why is this -- why is this
 11 occurring? Why is -- is he asking to do that? And he
 12 said "It's -- Bond Dickinson are advising", and then
 13 I think he -- I can't 100 per cent be sure but he either
 14 had the minutes with him of the first Horizon weekly
 15 call or he subsequently forwarded it to me, or something
 16 or other, and then I think there's mention of that in
 17 there, about the, you know -- if it's -- you know, more
 18 or less what it says here. If it's minuted, it's
 19 disclosable, if it isn't, then it isn't. You know, that
 20 type of thing. I can't remember 100 per cent what it
 21 was but --

22 **Q.** So to be clear, Mr Singh, what you're asking Mr Clarke
 23 to advise on here is something that didn't emanate from
 24 John Scott, it instead, on your understanding, came from
 25 Bond Dickinson?

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1 That only mentions what I've described as the
 2 future, ie what's going to happen from hereon in. Are
 3 you sure you were additionally told that past minutes
 4 were to be shredded?

5 **A.** Certainly David Posnett mentioned shredding, yes.

6 **Q.** Thank you. Can we move on, please, to POL00325474.
 7 This is the following day, 1 August 2013, at 8.10 in the
 8 morning. It's your email to Martin Smith with the
 9 subject "Disclosure in Criminal cases":

10 "Martin

11 "I know Simon is advising on disclosure. As
 12 discussed can he look into the common myth that emails,
 13 written communications, etc, meetings. If it's produced
 14 its then available for disclosure. If it's not then
 15 technically it isn't? Possible true of civil case NOT
 16 CRIMINAL CASES?"

17 By this time, Mr Clarke had been coming to write
 18 an advice, yes?

19 **A.** Yes, I think he told me that he was and, if I wanted him
 20 to deal with this, as well, he'll, you know, he'll place
 21 it before him.

22 **Q.** Is this something else that was said in the conversation
 23 that you had with Dave Posnett, that had emanated from
 24 Mr Scott, namely if something is written down, then it's
 25 available for disclosure, if you don't write it down,

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1 **A.** The second bit is from Bond Dickinson. The first bit
 2 I think -- well, those matters are highlighted to me by
 3 Mr Posnett, you know, the minutes and also the advice by
 4 Bond Dickinson.

5 **Q.** Mr Singh, can I be very clear about this, what are
 6 regard as the first bit and the second bit. We've
 7 talked about the shredding and the scrapping --

8 **A.** Yes.

9 **Q.** -- which you relayed, you say, in your conversation to
 10 Mr Smith.

11 **A.** Yes.

12 **Q.** Then this is an add-on. You're saying, the following
 13 morning, "Can Mr Clarke also address this, please?" I'm
 14 asking: where did this come from? Did this come from
 15 Mr Scott or did this, on your understanding, come from
 16 Bond Dickinson?

17 **A.** No, Dave Posnett pointed it out to me and I said, "Well,
 18 where's that coming from?" and he said Bond Dickinson is
 19 advising, you know, in respect of disclosure.

20 **Q.** Did he say who within Bond Dickinson was saying this?

21 **A.** I think Mr Parsons.

22 **Q.** Andrew Parsons?

23 **A.** Yeah.

24 **Q.** Thank you. Can we move on, please, to POL00006799, and
 25 look at page 2. This Mr Clarke's advice of 2 August,

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1 the so-called shredding advice. In paragraph 5, if we
 2 scroll down a little bit, he sets out, as is good
 3 practice, the information upon which he is acting in
 4 order properly to advise. He says:
 5 "At some point following the conclusion of the third
 6 conference call ... it became unclear as to whether and
 7 to what extent material was either being retained
 8 centrally or disseminated. The following information
 9 has been relayed to me:
 10 "The minutes of a previous conference call had been
 11 typed at emailed to a number of [people].
 12 An instruction was then given that those emails and
 13 minutes should be and have been, destroyed: the word
 14 'shredded' was conveyed to me."
 15 The second part of that would be accurate. You
 16 would have conveyed that to Martin Smith, wouldn't you?
 17 **A.** I think, yes.
 18 **Q.** What about the part which says, "The minutes have been
 19 destroyed"? Had you conveyed that to Martin Smith?
 20 **A.** Certainly, I don't know about destroyed. I think
 21 shredded definitely, but I'm not sure about "destroyed".
 22 **Q.** I'm asking a slightly different question, Mr Singh.
 23 **A.** Sorry.
 24 **Q.** One is about an instruction having been given, whether
 25 using the language of "destroyed" or "shredded", and
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1 That would tend to suggest that perhaps it was legal
 2 advice, which would be consistent with you saying that
 3 you had been told that this had come from Bond
 4 Dickinson, correct?
 5 **A.** That's -- I think David Posnett pointed that out to me.
 6 It was one of the -- you know, it was -- in one of the
 7 minutes -- weekly calls, when I wasn't asked to attend.
 8 **Q.** Okay:
 9 "Advice had been given to Post Office ...
 10 "If it's not minuted it's not in the public domain
 11 and therefore not disclosable.
 12 "If it's produced it's available for
 13 disclosure -- if not minuted then technically it's
 14 not."
 15 **A.** Yes.
 16 **Q.** You agree you did pass that on --
 17 **A.** Yes.
 18 **Q.** -- in effect, via your email of 1 --
 19 **A.** Yes, it's in there, yes.
 20 **Q.** Then scroll down to iv, please:
 21 "some at [the Post Office] do not wish to minute the
 22 weekly conference calls."
 23 Is that something that you passed on?
 24 **A.** No, I don't think -- I don't know about -- I don't think
 25 I passed that on but I certainly the first. The last
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1 then the second issue is, in fact, whether that's been
 2 carried into effect. Did you tell Mr Smith that the
 3 instruction had been carried into effect?
 4 **A.** I can't remember that. I mean, all I said was --
 5 a memory, David was there and I think within minutes
 6 of -- I phoned Martin Smith, I relayed it -- I mean,
 7 I don't know, to be honest -- to be honest with you,
 8 whether, you know -- the shredding or destroying has
 9 been carried out or not but --
 10 **Q.** Okay, move on to the second point, (ii). The
 11 information relayed to Mr Clarke was:
 12 "Handwritten minutes were not to be typed and should
 13 be forwarded to [Post Office] Head of Security."
 14 Was that something you told Mr Smith about?
 15 **A.** Certainly, I think David Posnett did say, you know, that
 16 Mr Scott wants them, or something like that but,
 17 I mean -- but I -- he needs them or he wants them, or it
 18 needs to be forwarded to him, but I don't know. But
 19 certainly, if that's what I said, that's more or less --
 20 David Posnett's there, and I just relayed it to him and
 21 I said, "Look, do you want to speak to David yourself?"
 22 **Q.** So you think this is something that you would have
 23 passed on to Martin Smith?
 24 **A.** Probably, yes.
 25 **Q.** "iii. Advice had been given to Post Office Limited ..."
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1 bit I'm not sure about.
 2 **Q.** In terms of the consequences of all of this, what was
 3 done to ask Mr Scott what he had said and why he was
 4 saying it?
 5 **A.** It was difficult for me because I think he was senior to
 6 me and I think, also, I think he -- you know, he
 7 reported to Susan. But my first concern was to document
 8 it and put it, you know, put it out to independent
 9 person to make a record and to enforce it on the --
 10 within the Legal Team or the Post Office or -- you know,
 11 how important disclosure is, to get it right. I don't
 12 know whether I -- I spoke to Hugh or even Rodric,
 13 I don't recall now. But that's all I done. I mean,
 14 I didn't, you know, follow it up with anything more than
 15 that.
 16 **Q.** To your knowledge, what was done to confront Mr Scott
 17 with these issues?
 18 **A.** I don't know whether Mr Scott was confronted but,
 19 certainly, I think I probably was more confronted than
 20 he was because I was told "Why didn't you come to us
 21 first?" I think Susan subsequently -- I don't know when
 22 that conversation took place.
 23 **Q.** Can you keep your head up and therefore your voice up,
 24 please?
 25 **A.** Yeah, I don't know when it was. I think some time
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1 after, I think, Susan spoke to me and said, "Well, look
2 why didn't you come to us first, rather than going to
3 Cartwright King"?

4 **Q.** What was the context of that, "Why didn't you come to us
5 first, rather than Cartwright King"?

6 **A.** I don't know. I don't know to be honest what that was
7 but, certainly, the way I saw it, that it had to be
8 dealt with, because saw it as a very serious, serious
9 matter.

10 **Q.** What was done to treat it as a very serious matter,
11 then?

12 **A.** Well, on my part --

13 **Q.** Other than passing the information to Simon Clarke and
14 him saying it's a bad thing?

15 **A.** Well, the thing is it's beyond my grade, in that sense,
16 but certainly I've highlighted it. I don't know who
17 else I could have gone to.

18 **Q.** Never mind you yourself. To your knowledge, was
19 anything done at all, as a result of this?

20 **A.** Not to my knowledge, no.

21 **Q.** This indicated that the Head of Security, responsible
22 for prosecutions, had a fundamental misunderstanding of
23 the rules of disclosure. He'd been the Prosecution
24 Authority and the Head of Security for years. Why was
25 nothing done?

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1 know, involved in any discussions or conversations.

2 **Q.** So, to your knowledge, this issue was not raised with
3 the CCRC?

4 **A.** I -- not to my knowledge, no.

5 **Q.** You've told us that you sought advice from Martin Smith
6 and Simon Clarke of Cartwright King in relation to the
7 Post Office's criminal litigation disclosure
8 obligations, following the suggestion that Mr Scott had
9 instructed minutes be shredded and scrapped. Did you
10 seek any equivalent advice from the Procurator Fiscal's
11 office in Scotland?

12 **A.** Not -- no. I can categorically say, no, I did not, sir,
13 no.

14 **Q.** Did you seek any equivalent advice from your Scottish
15 agents, BTO?

16 **A.** No, no, I didn't.

17 **Q.** Was Mr Clarke's advice, this advice of 2 August 2013,
18 disclosed to either the Procurator Fiscal or your agents
19 in Scotland, BTO, to your knowledge?

20 **A.** I certainly didn't. I don't know whether Cartwright
21 King did or not.

22 **Q.** To your knowledge, was there any discussion between the
23 Post Office and those in Scotland in relation to this
24 issue?

25 **A.** Not to my knowledge, no.

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1 **A.** Well, it was scary, really, because I think he was
2 an ex-police officer as well, I think. So I don't know,
3 to be honest, years go by, and -- but, certainly, at
4 that time, maybe I should have had done more. I --

5 **Q.** This was a matter of post-conviction disclosure as well,
6 wasn't it?

7 **A.** Yes, it was very, very serious and certainly, on my
8 part, I think, after speaking to David and Martin,
9 I went outside and walked around the block a few times
10 because it was just -- I just felt really, really, you
11 know, really annoyed with myself, and I think it was
12 that point I was thinking about leaving, it was that
13 serious.

14 I don't know, it was scary that anything like that
15 can happen and there's -- you know, especially when
16 you've been advised on it and we got all sorts of issues
17 and problems within.

18 **Q.** Was it so scary that, to your knowledge, the CCRC were
19 told about it?

20 **A.** I think they were involved in it. I don't know whether
21 they were told about it because it wasn't something that
22 I got involved in, certainly there was a lot of advices
23 being sought, whether about this matter or other issues
24 Post Office found themselves involved in at that stage.
25 But it wasn't something that I was copied into or, you

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1 **Q.** Thank you. Can I turn to my third topic, please, which
2 is the Post Office's prosecution strategy. Do you agree
3 there came a time in mid-2012 when decisions were being
4 made as to whether the Post Office should keep
5 prosecuting cases?

6 **A.** I don't know what -- can you say what you're
7 specifically referring to?

8 **Q.** Okay, I'll take you to a document, POL00180229. If we
9 look at the foot of the page, thank you, an email to you
10 of June 2012 from Susan Crichton, in the case of
11 Yetminster:

12 "Jarnail -- if we decide not to go ahead with
13 criminal prosecution are there any risks for [Post
14 Office]?"

15 Yes? Your reply at the top:

16 "Susan ..."

17 I'm going to read this as it's written:

18 "As a prosecutor Post Office prosecution limited
19 must be seen to exercise its judgement in all cases
20 which give rise to potential criminal proceeding to
21 promote effective consistent and fair decision making.
22 If not a third party examination of our cases by say
23 Director of Public Prosecution may result in withdrawal
24 of our ability to prosecute.

25 "Decision not to prosecute cannot be kept secret

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1 'everybody will find out what we are doing' this may
2 open Post Office to criticism and undermine faith in
3 Horizon. This U-turn will be exploited by potential
4 third party subpostmasters' alliance. It may send
5 a green light for defendants to get hold of their Member
6 of Parliament and result in copulation.

7 We need to send a message that 'Post offices cannot
8 be used as a bank'. We hold a robust stance, any
9 wrongdoing will be investigated, prosecuted and money
10 recovered."

11 Was it the Post Office's policy to bring
12 prosecutions against subpostmasters to "maintain faith
13 in Horizon"?

14 **A.** No, I don't think so, sir.

15 **Q.** Why were you concerned that, if a decision not to
16 prosecute was taken, it may undermine faith in Horizon?

17 **A.** I think Susan Crichton asked me for a general advice.

18 **Q.** Well, no, she didn't. She said "If we decide not to go
19 ahead with criminal prosecution are there any risks"?

20 **A.** Well, those are the two risks. I was asked "Look, as
21 far as the criminal aspect of the prosecution are
22 concerned, we're getting advice from Cartwright King.
23 But you need to have broadened your advice to look
24 through the business lens". So that's why I divided
25 into two bits. Firstly, you know, the legal risk that,

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1 **Q.** Okay, so looking at that second paragraph, then, you
2 say:

3 "[A] Decision not to prosecute ... may open Post
4 Office to criticism and undermine faith in Horizon."

5 Did you see prosecutions as a way of maintaining
6 faith in Horizon?

7 **A.** No, no, I --

8 **Q.** Why did you write that?

9 **A.** I don't know, this is -- "cannot be kept secret".

10 I don't recall exactly what was -- I was thinking -- all
11 I was thinking about, you can't -- you've got to have
12 a consistent approach. You can't, you know, have one
13 case and decide not to prosecute -- not -- you know, and
14 not to go ahead and --

15 **Q.** You deal with consistency in your first paragraph?

16 **A.** Yeah.

17 **Q.** Here you're dealing with a separate issue, Mr Singh,
18 which is "If we don't prosecute it may undermine faith
19 in Horizon".

20 **A.** Um --

21 **Q.** I'm asking: did you see prosecutions as a way of
22 maintaining faith in Horizon?

23 **A.** No. I think this case was one of those MP cases that's
24 referred to, you know, the Post Office and I don't know
25 what discussions I had with her. She mentioned that we

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1 you know, when you're making a decision it's got to be
2 a consistent, fair decision.

3 **Q.** I'm not asking you about that at the moment.

4 **A.** Oh, sorry.

5 **Q.** I'm asking you about the second paragraph, which says:

6 "Decision not to prosecute ... may open Post Office
7 to criticism and undermine faith in Horizon."

8 **A.** Um --

9 **SIR WYN WILLIAMS:** Sorry to interrupt, Mr Beer, but I just
10 want to understand the context. My reading of the email
11 from Ms Crichton is that it is confined to a question as
12 to whether the prosecution relating to the Yetminster
13 branch should go ahead.

14 **A.** Just one, yeah.

15 **SIR WYN WILLIAMS:** Am I right in thinking that because,
16 obviously, that may impact upon Mr Singh's reply.

17 **MR BEER:** Sir, that's my understanding but Mr Singh should
18 give the evidence.

19 **SIR WYN WILLIAMS:** Fine.

20 **MR BEER:** Was it your understanding that the question was
21 asked and, therefore, fell to be answered by reference
22 to not prosecuting the subpostmaster at the Yetminster
23 branch?

24 **A.** I think so. I think she -- yes. I think it was just --
25 yeah, Ms -- I can't remember the lady's name, yeah.

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1 need to, you know, draft a letter mentioning the Horizon
2 system. So I'm trying to give a comprehensive reply,
3 I suppose, dealing with each individual bit of what
4 questions she's posed to me.

5 **Q.** Did the Post Office regard it as important to maintain
6 faith in Horizon?

7 **A.** Well, if they're going to -- if they didn't have faith
8 in Horizon, they couldn't really prosecute, could they?

9 **Q.** Did you regard it as important to maintain faith in
10 Horizon?

11 **A.** Well, it's critical, isn't it? I mean, the -- all our
12 Post Office prosecutions are aligned on Horizon but, as
13 to what I had or not had, wasn't relevant.

14 **Q.** Did you receive instructions from managers, including
15 Senior Managers, about the importance of protecting the
16 Post Office brand or the reputation of Post Office or
17 the reputation of Horizon?

18 **A.** No, sir. I didn't have very much contact within the
19 senior management. I think the only --

20 **Q.** Or from any other person?

21 **A.** No, I think the only persons I dealt with in the Post
22 Office Limited was Susan and Hugh. I didn't have any
23 wider contact within the business, no.

24 **Q.** Why was a decision whether to continue with the
25 prosecution being taken by reference to issues such as

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1 the undermining of faith in Horizon, the potential
 2 exploitation of it by JFSA and the sending of a green
 3 light to defendants to get hold of their Member of
 4 Parliament, rather than the evidential strength of
 5 a case against the subpostmaster?
 6 **A.** No, I think it always is the evidential test. I mean,
 7 whereas a prosecutor has got to apply that, and the
 8 two-tier test, as you know. But, here, I think we're
 9 dealing with one case and I've been asked to address it.
 10 It wasn't anything more than that.
 11 **Q.** Why was it important to send a message to subpostmasters
 12 that post offices cannot be used as a bank?
 13 **A.** That is -- from my recollection, is -- I think is
 14 a reference to speaking to somebody within the business,
 15 or I've been referred to something within the business,
 16 where, you know -- I don't know, it's some sort of
 17 statement I think somebody referred me to, and I think
 18 that's why, you know, it's put in quotes. You know,
 19 because I'd been told --
 20 **Q.** Who said the Post Office can't be used as a bank?
 21 **A.** Sorry?
 22 **Q.** Who said the Post Office can't be used as a bank?
 23 **A.** I think it's either somebody referred me to some
 24 literature, because I'm -- the thing is, I'd been asked,
 25 "Look, your advices need to be a bit more broad. You've

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1 hold of their Member of Parliament and result in
 2 copulation."
 3 Presumably you meant "capitulation"?
 4 **A.** Yeah, sorry. Yes, probably yes. Of course.
 5 **Q.** Why did you think that stopping one case might result in
 6 capitulation?
 7 **A.** I didn't -- I don't know why I thought that, but --
 8 **Q.** Who would be capitulating?
 9 **A.** I can't think. I can't explain it to you now but,
 10 certainly, at that time, I thought about the advice and
 11 I think I even spoke to one or two people, maybe Hugh,
 12 Hugh Flemington, I think I said, "Look, Hugh, you said
 13 you wanted me to look at it from the business lens, what
 14 do you think? Is it okay for me to send that on?" and
 15 he said, "Well, yes. I mean that's the way you need to
 16 sort of think of it, not just from the legal side of it
 17 because that bit we can get from Cartwright King". So
 18 there, it's more of a splitting it --
 19 **Q.** Would it be the Post Office capitulating?
 20 **A.** I don't know, sir.
 21 **Q.** Who else could it be?
 22 **A.** I can't --
 23 **Q.** Try and help us, Mr Singh?
 24 **A.** I can't help you on that yet.
 25 **Q.** Try again, please. Who else could it be capitulating?

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1 got to look at it, the business, you know, from
 2 a business lens", and I think it's -- what's the advice?
 3 It's 7 June, so it's earlier on, and I've gone and
 4 spoken to somebody and I think they referred to me some
 5 literature where I've taken that out, and that's --
 6 **Q.** This is somebody else speaking here, not you, then?
 7 **A.** It's actually a literature somebody has referred me to.
 8 That's why it's in quotes. It's probably I've taken it
 9 out from some, you know --
 10 **Q.** Was this a commonly held view within the Post Office at
 11 this time --
 12 **A.** No --
 13 **Q.** -- that subpostmasters used the Post Office as a bank?
 14 **A.** No. I mean, as I say, it was may be naive of me to put
 15 it in but --
 16 **Q.** Why did you put it in? Why did you ally yourself to
 17 this sentiment, which you say was in some literature?
 18 **A.** Because I wanted her to advise to me, is this is the
 19 legal side of things and this is the business. It's
 20 just at that time, I decided to split it in that way,
 21 it's easier for me to explain it, and it was a way of
 22 doing it. I mean, it was nothing more than -- neither
 23 more -- it wasn't more than that.
 24 **Q.** At the end of the sentence above:
 25 "It may send a green light for defendants to get

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1 **A.** It's advice earlier on in my, you know, transfer to the
 2 Post Office Limited, maybe I was wrong. Maybe
 3 I shouldn't have considered it and just left it at
 4 the -- you know, the first bit saying, "Look, this is
 5 from the legal point of view, if we're going to
 6 prosecute that, you know, you've got to be open, you've
 7 got to be fair and you've got to be consistent. You
 8 can't just take one case and discontinue it. There has
 9 got to be justification for it".
 10 **Q.** You don't stop there, do you?
 11 **A.** Sorry?
 12 **Q.** You don't stop there and say, "It's important that we
 13 adopt a consistent approach, that there's uniformity of
 14 decision making across our cases. We can't take into
 15 account extraneous factors"? What you go on to do is
 16 list a series of factors that you say would be in play,
 17 if the prosecution in the Yetminster branch was
 18 discontinued, don't you?
 19 **A.** Sir, are we looking at 7 June 2012?
 20 **Q.** You were the only criminal lawyer in Post Office Limited
 21 then, weren't you?
 22 **A.** Well, we got Cartwright King on the sidelines as well.
 23 **Q.** In the Post Office, you were -- I think you'd been --
 24 you were now called Head of Criminal Law, weren't you?
 25 **A.** Well, everybody is now at the moment but they weren't at

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1 that time.

2 **Q.** Sorry?

3 **A.** They are now but they weren't calling me Head of
4 Criminal Law at that time. But, yeah, I mean, yes,
5 I was the only criminal lawyer there, yes.

6 **Q.** Is this how you felt about prosecution of
7 subpostmasters --

8 **A.** No.

9 **Q.** -- in June 2012?

10 **A.** No, sir, no, that's not --

11 **Q.** Is this a window into your mind in June 2012?

12 **A.** That's not -- no. As I said to you, she's asked for me
13 a very general advice, the risks to the Post Office, and
14 as I said to you, that I'd been asked by Head of Legal,
15 Hugh Flemington, "Look, you know, you need to -- your
16 advices need to be a bit more broad, you've got to not
17 only do the legal side of it but also to look at it from
18 a business lens", and that is the business lens, and as
19 I said to you, that is, you know -- what I've quoted is
20 from within the business.

21 **Q.** More generally, was it important to the Post Office, as
22 you understood it, that there should be no public
23 blaming of the Horizon system?

24 **A.** No. No. That was a one-off advice. I mean, advice is
25 standalone, I mean, on what I'd been asked to do.

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1 that he does not challenge the integrity or blame or
2 criticise the Horizon system and all losses and costs
3 are paid."

4 Why was it a necessary part of the guilty plea that
5 the defendant should accept, as part of that guilty
6 plea, in writing, that he doesn't challenge the
7 integrity of Horizon or blame or criticise Horizon?

8 **A.** That's been the established position of the Post Office,
9 or -- you know, the position from Royal Mail Group
10 Limited -- I think that position had been established by
11 Rob Wilson as Head of Criminal Law, and that's
12 a continuation of that and, also, as far as having it in
13 writing, is the facts are agreed between the defendant
14 and the prosecution, so that you don't have a dispute on
15 the facts. Then there'd be another hearing within the
16 hearing, a Newton hearing, I think it's called, so
17 that's just to clarify both parties' position. It's
18 beneficial to the defence as well because --

19 **Q.** How is ruling out the possibility of Horizon being to
20 blame for false accounting beneficial to the defendant?

21 **A.** That -- I'm just recreating or emphasising the position
22 as it is. That's what -- the established position has
23 been for number of years and, here, it's been carried on
24 to the Post Office Limited. I mean, the position hasn't
25 changed. It's just all I'm doing is, "Look, this is the

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1 **Q.** Can we look at POL00325434. Scroll down, please. Email
2 from Martin Smith to Rachael Panter, in the case of *Post*
3 *Office v Dixon*:
4 "Please see attached letter from [defence
5 solicitors].
6 "Seems that case capable of resolution without
7 trial?"
8 Scroll up, please, keep going. Rachael Panter sends
9 that on to you:
10 "Please see attached letter ...
11 "Mr Dixon is currently facing a single count of
12 fraud, a copy of the indictment is attached.
13 "Counsel Will Saunders from 3 Temple Garden Chambers
14 is instructed in this case which is listed for trial [in
15 Exeter] on 12 August. Steve Bradshaw is the [Officer in
16 the Case].
17 "How would you like me to respond to the defence
18 solicitors' letter? Would false accounting be
19 acceptable on the condition that the [14,000] is repaid
20 in full? Please respond accordingly."
21 Then up, please, your reply:
22 "Rachael
23 "The guilty plea to false accounting offered by the
24 defence is acceptable to [the Post Office] provided
25 defendant accepts as part of his guilty plea in writing

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1 way we've been dealing with it", but it's certainly,
2 from the factual or evidential side of it, I think
3 I have -- you know, in the future, I have said to them,
4 "look, you're the solicitors in the case. You've got
5 the papers, you review it, and you make a decision in
6 light of your instructions from the Investigation Team
7 and the decision maker".
8 I think that's within of the first ones that's come
9 to me and I've reiterated the position of the Post
10 Office Limited.

11 **Q.** Who told you about the Royal Mail Group and then Post
12 Office policy that a defendant must accept, as part of
13 their guilty plea, that they do not challenge the
14 integrity of or blame or criticise Horizon?

15 **A.** I think that's Rob Wilson. I think he's -- there's
16 emails --

17 **Q.** By this time, wasn't it the case that a number of
18 defendants had previously tried to make a plea on the
19 basis of Horizon being at fault?

20 **A.** I'm not -- I don't -- I can't recall now, to be honest.

21 **Q.** If they had, would that not have caused you or anyone at
22 Post Office to think, "Well, hold on, maybe the system
23 isn't as robust as we've been told"?

24 **A.** Well, certainly now, I didn't realise that, you know
25 from what the Inquiry's evidence is, and I've seen, that

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1 it is quite painful to hear that people have been forced
2 into accepting false accounting offences as a lesser
3 offence, yes. I mean, now, in hindsight, or looking
4 back now, it was wrong, and maybe we shouldn't have, you
5 know, that shouldn't have been the policy, we shouldn't
6 of done it that way. But that is what it was at that
7 time.

8 **Q.** Weren't you instrumental in deploying that wrongful
9 conduct?

10 **A.** I'm not the decision maker. I think I've emphasised to
11 you before. I'm the only criminal lawyer there. They
12 refer the matters to me -- but it's a matter, if there
13 is something that needs a decision, I refer it to Hugh
14 Flemington, who is my line manager, who --

15 **Q.** You don't do that here, do you?

16 **A.** Sorry?

17 **Q.** You are the decision maker here, aren't you?

18 **A.** No.

19 **Q.** You don't refer it on to anyone else; your agents come
20 to you for instructions and you give instructions?

21 **A.** They're not my agents; they're agents for the Post
22 Office Limited. I don't know what their remit is but,
23 certainly here, the young lady is not a solicitor.
24 I think Martin Smith is the solicitor in the case and
25 she would obviously refer it to me and I think, at some

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1 **A.** Yes. But maybe it's one of the first ones that come
2 through the system or through the process, but there
3 is -- you know, over a period of time, I have said to
4 them, "You're the lawyers, you've got the papers.
5 I haven't got the papers. You need to make a decision
6 in discussing it with the Investigation Officer or the
7 decision maker". But, at that time, all I've done is
8 highlighted this is what we need to do if the plea is
9 acceptable, it's got to be in writing and that's what we
10 normally endorse. We have that in writing so the facts
11 are clear, that both parties agree to.

12 **MR BEER:** Thank you, Mr Singh.

13 Sir, would that be an appropriate moment to break
14 until 2.00, please?

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

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

17 (1.10 pm)

(The Short Adjournment)

19 (2.00 pm)

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

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

22 **MR BEER:** Thank you, good afternoon, Mr Singh.

23 Can we just finish off the topic which we were on,
24 which was the purposes of prosecution and whether it
25 included the protection of the Post Office brand. Can

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1 stage, I would have had discussion with Martin or he
2 should have come back to me or even the -- Steve
3 Bradshaw, and I would say, look --

4 **Q.** Where's the record of any of that, as opposed to this
5 email exchange, which really clearly and simply sets out
6 your approach?

7 **A.** This is not a decision, this is the emphasis of what --
8 what the stance or the established position is for the
9 Post Office, since years and years.

10 **Q.** Why don't you say to Mr Bradshaw, "Steve, instructions
11 on this, please, before I revert to Cartwright King"?

12 **A.** I think, if you look at another email, where I've
13 actually said that, I've said to -- Andy Cash, I think,
14 comes to me somewhere, I think, and, you know, you've
15 enclosed with the Inquiry papers, on that, and he
16 said -- and I've gone back and said, "What's your views
17 on it?"

18 **Q.** There are definitely emails in which you do go back to
19 your client and say, "Can I have instructions?" I'm
20 asking you on this occasion why you didn't?

21 **A.** I don't know. I mean, I don't recall, maybe it's
22 earlier on, maybe we're embedding the -- you know,
23 the -- embedding a different sort of way of dealing with
24 things but, certainly, Andy Cash and I think --

25 **Q.** This is nearly a year after separation?

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1 we look, please, at POL00148137.

2 This is an email exchange between you and Gavin
3 Matthews in the run-up to a conference to be held with
4 Mr Altman KC on 25 April 2014, understand?

5 **A.** Yes.

6 **Q.** At the foot of the page, Mr Matthews says "here is the
7 draft agenda", and it's all about the Post Office's
8 prosecution policy, okay?

9 **A.** Yes.

10 **Q.** If we go up to the top of the page, please, you make
11 a comment on it and you say:

12 "[Re the] Business Improvement Programme,
13 et cetera -- Whilst there's a suggestion that other
14 avenues should always be considered and rejected before
15 a criminal investigation is commenced, there will always
16 be cases where it is immediately apparent that
17 a criminal investigation should be commenced with a view
18 to prosecution to protect [the Post Office] brand and
19 reputation and in the interests of the business, etc."

20 Was it the case that some prosecutions were to be
21 commenced in order to protect the Post Office brand and
22 reputation?

23 **A.** I suppose, in that sense, it is a business. I don't
24 recollect what this is but, certainly, it's
25 a consideration in any business.

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1 Q. Was it a message that you were keen to emphasise?
 2 A. Not me personally, no.
 3 Q. Can we go on please to POL00148242. This is after the
 4 conference with Mr Altman on 25 April 2014, and it's
 5 an email from you to Ms van den Bogerd, and you say:
 6 "During the [recent Altman meeting] when the
 7 attached was mentioned you indicated that there would be
 8 cases where immediate intervention and suspension would
 9 be justified."
 10 Then, I think:
 11 "[An obvious] starting point [for] example in case
 12 of shortage of [between £20,000 and £30,000]."
 13 Then you say:
 14 "There will be cases in which it will be clear from
 15 the outset that [the Post Office] will need to conduct
 16 a criminal investigation with a view to potential
 17 prosecution to protect [the Post Office] brand and
 18 reputation and for business purposes."
 19 So you're making the same point again, aren't you?
 20 A. Yes. It's discussion paper. I don't think it's any
 21 more than that. I think you've got various people
 22 around the table and I'm just highlighting various
 23 aspect of it, you know, that's all. I mean, I don't
 24 know -- I'm just -- there are people putting their side
 25 of the argument. I'm putting the other things to be

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1 Lyons. You say:
 2 "I need to address and to prepare counterarguments
 3 to issues which are being raised and will be raised by
 4 defence lawyers, after [the Post Office] announced that
 5 Second Sight ... will conduct a review of the Horizon
 6 system even though [the Post Office] says Horizon is
 7 robust. When challenged has always successfully
 8 defended the system in high profile criminal trials in
 9 crown courts. Defence lawyers will say 'Why appoint
 10 forensic auditor to examine the system'.
 11 "Can you please help me with the following in order
 12 to put 'flesh on the bones'.
 13 "Reasons for the appointment of forensic auditor to
 14 examine the system.
 15 "What is Second Sight's remit.
 16 "What they will look at or are asked to review. Or
 17 what is being undertaken or not.
 18 "Are they reviewing, few, several or some isolated
 19 cases only.
 20 "Are they [really] looking and examining the Horizon
 21 system or in reality looking or examining certain branch
 22 accounting procedures and processes.
 23 "Anything you may consider useful.
 24 "It may be considered useful at some stage to have
 25 a press release to reconfirm the integrity and

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1 balanced with a view to coming to a solution, I suppose.
 2 Q. Was it your aim to emphasise the prioritisation of the
 3 Post Office's reputational and business interests?
 4 A. Possible -- no, maybe not.
 5 Q. Why do we see this appearing twice in very similar
 6 phrases, both before and after the meeting with
 7 Mr Altman?
 8 A. I think it's probably discussion with my line manager,
 9 or -- I mean, I'm just -- because I think I -- I'm not
 10 there just for myself. It's sort of emphasis on various
 11 aspects I've been advised on to do, to get advice on and
 12 relay back. I don't think it's a personal view.
 13 Q. Okay, thank you. That can come down.
 14 Can I turn to my fourth topic, please, which is
 15 Second Sight, their appointment, the announcement of
 16 their appointment, and the need to give an account, tell
 17 a story, about their appointment. Did you think it was
 18 important to create a message, a story, that could be
 19 told or broadcast in response to the appointment of
 20 Second Sight?
 21 A. Not personally, no.
 22 Q. Can we look, please, at POL00143374. If we look at
 23 page 2, please. This is an email from you of 11 July
 24 2012 -- so when Second Sight's proposed appointment was
 25 an issue -- to Susan Crichton, Hugh Flemington and Alwen

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1 robustness of the system but in [addition] including the
 2 remit of the Second Sight?
 3 "Sorry for the twenty questions ..."
 4 So you know that defence lawyers may ask questions
 5 in extant criminal proceedings, along the lines that you
 6 set out, and you were seeking instructions, correct?
 7 A. Yes.
 8 Q. At this time, Second Sight, the forensic accountants,
 9 their appointment was contemplated and you were
 10 considering what affect there might be on ongoing
 11 proceedings, correct?
 12 A. No, I wasn't personally. I didn't even know they were
 13 on board. I think it's something that Cartwright King,
 14 who are prosecuting, are getting letters from the
 15 defence.
 16 Q. Whether you were dealing with this personally for cases
 17 in which you were a prosecutor or whether Cartwright
 18 King were prosecuting those cases, you were seeking
 19 instructions, either on behalf of yourself or for
 20 Cartwright King, in order to be able to meet any defence
 21 challenges, correct?
 22 A. I don't think -- I wouldn't put it like that. Something
 23 referred to me I think by Cartwright King saying, you
 24 know, what -- "We've got to respond to the defence, we
 25 need to know the reason why or remit, or why is Second

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1 Sight engaged". They didn't a response, I think, to be
 2 able to respond to whatever the defence -- you know,
 3 respond to the request from the defence saying "Well,
 4 why Second Sight? What are they reviewing? What are
 5 they there to do?"

6 **Q.** Yes, so you're asking a series of not unreasonable
 7 questions about "What's this all about?"

8 **A.** What's it all about, yes.

9 **Q.** Can we see what happened as a result. POL00058155. Go
 10 to page 3, please. Can you see in the middle of the
 11 page -- we've got it up now -- the text of an email sent
 12 by you to Hugh Flemington?

13 **A.** Yes.

14 **Q.** Yes? The one beginning "After a number of meetings",
 15 yes?

16 **A.** Yes, yes.

17 **Q.** Is this the proposed draft of what is to be said?

18 **A.** I don't recall, to be honest. I can't remember where we
 19 are. I know it took a long while.

20 **Q.** We'd seen before that you'd been asking for some
 21 instructions about what's this Second Sight review all
 22 about?

23 **A.** Yeah.

24 **Q.** What work is it undertaking? We need to put out
 25 a message, essentially, when asked questions by the

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1 that this is not an acknowledgement by the Post Office
 2 that there is an issue with Horizon. The Horizon system
 3 is working properly, robust and is being used up and
 4 down the country, when the system has been challenged in
 5 criminal courts it has been successfully defended."

6 So was this your attempt, your first attempt, at
 7 a draft of what to say in response to questions that
 8 were raised as to why Second Sight had been appointed?

9 **A.** I know there was -- it was difficult to formulate it,
 10 because I didn't really have much information on it.
 11 I know I had to go to Rob Wilson at the Head of Criminal
 12 Law because I think he'd been dealing with this --

13 **Q.** Mr Singh, just putting to one side for the moment who
 14 you went to in order to draft it.

15 **A.** Yeah, that was the first draft, yes.

16 **Q.** This is the first draft?

17 **A.** Yeah.

18 **Q.** Okay, thank you. Then if we go to page 2, please, and
 19 scroll down. We can see that Alwen Lyons, the Company
 20 Secretary, passes this to Simon Baker and others:

21 "Simon, can you go to Alana with this request for
 22 the 'story' as they are the experts."

23 Then up the page, please, and stop there. Simon
 24 Baker sends it on to Alana:

25 "Please help us craft our message around the Second

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1 defence in criminal proceedings. It seems there's been
 2 a meeting, if you look at the top of the page:

3 "This is the story text which [Jarnail] put together
 4 following our meeting last week."

5 **A.** Yeah. Yes.

6 **Q.** So if we read it:

7 "After a number of meetings between Post Office
 8 Management and [MPs] in relation to the court cases, it
 9 was agreed that Post Office would undertake a review of
 10 the cases which had been raised by the Members'
 11 constituents.

12 "In order to provide assurance to the interested
 13 parties, Post Office Management proposed the use of
 14 independent auditors, Second Sight. The review to be
 15 undertaken will be specifically restricted to the cases
 16 raised by the MPs as well as reviewing the accounting
 17 procedures, processes and reconciliations ... Before
 18 formal instructions are given to the independent
 19 auditors, agreements will be sought from all interested
 20 parties, namely [MPs] and [JFSA]. The subpostmasters
 21 have requested a forensic accountant of their choice to
 22 be appointed to oversee the cases being reviewed by
 23 Second Sight.

24 "All of the above is accepted based on the terms of
 25 the review being carried out, but it must be stressed

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1 Sight review. We need to combat the assertion that the
 2 review is acknowledgement there's a problem with
 3 Horizon.

4 "Jarnail has drafted some words below. Do they
 5 strike the right tone?"

6 Then up the page, please. Then Ronan Kelleher -- if
 7 just scroll down, we can see who he is, the Head of PR
 8 and Media; did you know Mr Kelleher?

9 **A.** No, no.

10 **Q.** But, anyway, up the page:

11 "Simon

12 "As this message will probably find its way into the
 13 media, we do need to get the message across from the
 14 start that we continue to have full confidence in the
 15 robustness of the Horizon system and then reinforce it
 16 so I suggest the following tweaking to the proposed
 17 wording from Jarnail ..."

18 Then it's set out. I'm not going to go through
 19 a line-by-line comparison of the changes that have been
 20 made. Do you know why the Head of PR and Media at the
 21 Post Office was being involved in the creation of
 22 a story that would be given to, or told to, defence
 23 solicitors?

24 **A.** No. I didn't know they were going to be involved
 25 I think it was the Company Secretary, Alwen Lyons, said

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1 they're the experts, referred it to them. I didn't even
 2 know -- all I wanted was to -- Hugh and Susan, you know,
 3 the General Counsel and Head of Legal, to help me with
 4 it, and give me instructions and make a decision. But
 5 I didn't know she'd referred it because she said they
 6 were the experts. That's the way they did things.
 7 I mean, I --
 8 **Q.** Okay, if we scroll then, please, we'll see Simon Baker
 9 says, "That works", and then it's forwarded to -- you're
 10 included on that chain, the "That works" chain, and you
 11 reply to Hugh, Susan and Alwen:
 12 "You have seen the final draft of 'our story' can
 13 this now be released to our agents and counsel for
 14 consistent approach and submissions where there is
 15 challenges to the Horizon [system]."
 16 So did you understand the message or "our story", as
 17 you've called it, to be essentially the text that
 18 solicitor agents and counsel should use in submissions
 19 when an issue was raised as to the appointment of Second
 20 Sight in court?
 21 **A.** I don't know the -- that. But I can certainly say it
 22 was something that the -- Cartwright King wanted to know
 23 the reasons why, and all I've done is copy that into
 24 Susan and Hugh for a decision on assist me on doing it,
 25 and I think that what I've done is I've managed to get
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1 was -- I don't know. I don't recall what happened after
 2 that. Was there not more than that? I thought --
 3 I know it took a long time to get it --
 4 **Q.** Let's go to what happened next, then. POL00120723, and
 5 page 5, please. Can you see this is a witness statement
 6 from Mr Bradshaw of 20 November 2012?
 7 **A.** Yes.
 8 **Q.** If we scroll down, can you see it says:
 9 "After a number of meetings with Post Office
 10 Management and Members of Parliament", et cetera.
 11 Yes?
 12 **A.** Yes.
 13 **Q.** If we go over to the second page, it finishes off:
 14 "When the system has been challenged in criminal
 15 courts it has been successfully defended."
 16 That's the same wording and your story, as amended
 17 and improved by Head of PR and Media in the Post Office?
 18 **A.** I wouldn't go with my story; that's the Post Office
 19 story. That's what --
 20 **Q.** You called it "our story", and you were part of the Post
 21 Office?
 22 **A.** Well, that's what's it's added but, I mean, I think you
 23 have got the decision makers confirming --
 24 **Q.** Okay, I'll put it more neutrally then. It's based on
 25 text that you wrote, which had been amended by the Head
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1 a lot of information from Rob Wilson at Royal Mail
 2 Group, who'd been -- know the system from the beginning,
 3 and he assisted and helped me with it, and Hugh and
 4 Susan took it forward.
 5 **Q.** But you would agree that your understanding of the
 6 purpose of this is for release to lawyers to ensure
 7 a consistent approach to submissions they might make?
 8 **A.** It was going to Cartwright King. I don't know to what
 9 degree they would use it but, certainly, they wanted
 10 a decision and I've managed to half pass it to Head of
 11 Legal and Susan, to consider it in line with what they
 12 normally do, put it through the process, whatever they
 13 do, and they proved it, I think.
 14 **Q.** So does it come to this: a story that was drafted
 15 initially by you has been amended by the Head of PR and
 16 Media in the Post Office and is to be sent out to agents
 17 and counsel to ensure a consistent approach to the
 18 submissions they make?
 19 **A.** I don't know whether that was --
 20 **Q.** I'm just reading various words on a email chain.
 21 **A.** Yeah, I appreciate.
 22 **Q.** If you add them all together that seems to be what they
 23 suggest.
 24 **A.** I don't know, I don't recall exactly what happened after
 25 that. But that's the start of it, I think, and maybe it
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1 of Media and PR in the Post Office, isn't it?
 2 **A.** Well, that's the process they followed and I --
 3 **Q.** And it's ended up as a witness statement?
 4 **A.** Well, it shouldn't have done.
 5 **Q.** Sorry?
 6 **A.** It shouldn't have done.
 7 **Q.** Yes, well, I'm going to ask you how it has happened?
 8 **A.** I don't know. I don't know how it's happened because
 9 all I've done is prepared it in line with my
 10 instructions from, you know, the decision makers.
 11 **Q.** If we go back to the previous page, please, this is word
 12 for word the same as the draft of the Head of PR and
 13 Media.
 14 **A.** Well, I can't answer that. It shouldn't have done.
 15 I don't know who put it in because that's not the
 16 purpose for it.
 17 **Q.** Did you provide this to Mr Bradshaw to put in a witness
 18 statement?
 19 **A.** Absolutely not, no.
 20 **Q.** How did what started off as a message, a "story", for
 21 agents and counsels to work to when, perhaps, resisting
 22 application for a stay, resisting applications for
 23 adjournments or disclosure arguments, get turned into
 24 a witness statement which contains a statutory
 25 declaration at the top?
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1 A. I don't know. I don't recall, and I certainly didn't
 2 have any part to play. I've done -- you know, in line
 3 with instructions and -- from the decision makers.
 4 That's -- I don't think I've ever -- not seen that
 5 before.

6 Q. If we go back to page 1, please, and we scroll down we
 7 can see that this example of Mr Bradshaw's witness
 8 statement is disclosed as a notice of additional
 9 evidence in the case against Kim Wylie at Newcastle
 10 Crown Court. There are a number of others, I can point
 11 to many other witness statements where Mr Bradshaw --

12 A. Yeah, sure.

13 Q. -- has made the same statement?

14 A. Yeah.

15 Q. Can you help us with "our story" got turned into
 16 an account with a statutory declaration on it?

17 A. I can't help you because I prepared it in -- as per
 18 instructions and I got to Rob Wilson to look through it
 19 to make sure everything was okay, and then I referred it
 20 back to Hugh, Susan, and the Company Secretary. They
 21 took it up with the media. I have never come across,
 22 you know -- that's what they were going to do but,
 23 certainly, that's not my intentions. That wasn't me.
 24 Doing it. I just did whatever I was instructed to do
 25 and it certainly shouldn't have finished up in a witness

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1 was updated periodically, so you need to look at it as
 2 a whole, rather than, you know, as a standalone
 3 document, because it wasn't.

4 So I think it was something that I put forward
 5 because I was asked for a view but it was -- I wasn't
 6 the decision maker and it was just something that
 7 I provided for them to consider.

8 Q. Can we look at an email discussion of this topic.
 9 POL00346092. Look at the second page, please. This is
 10 in the context of case M029, and you say:

11 "Andy [Andrew Parsons]
 12 "I anticipate Chris [Chris Aujard] is the best
 13 person to make a decision on this point on behalf of
 14 [the Post Office].
 15 "Our allegations [that Post Office] has NOT properly
 16 investigated being made generally or in specific cases?
 17 One of the dangers of investigation officers report
 18 being disclosed is that it will always be easy for the
 19 applicant to think of something not specifically
 20 referred to in the report and allege that [the Post
 21 Office] investigation has not been sufficiently
 22 [thorough] or adequate. Of course it is highly unlikely
 23 the investigation will have been deficient, but in the
 24 absence of a full set of papers it may become impossible
 25 for [the Post Office] to rebut such new allegations."

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1 statement.

2 Q. You said earlier words to the effect that "This was bad"
 3 or "It was poor" or "It shouldn't have happened". Why
 4 was it bad, poor or shouldn't have happened?

5 A. Well, it's the -- the witness statement is personal to
 6 whoever is making it. It should be factual, shouldn't
 7 it? It should be Stephen Bradshaw's recollection of his
 8 evidence.

9 Q. All of this went on without your knowledge; is that what
 10 you're telling us?

11 A. Yes, I -- I don't recall. I mean, I don't recall that's
 12 where it ended up, no.

13 Q. Okay, thank you. That can come down. Were you
 14 concerned about the disclosure of Investigating
 15 Officers' reports because they might contain in them
 16 information that was of assistance to the defence?

17 A. No. I think what that was a view -- are you talking
 18 about mediation disclosure or are you talking about
 19 generally --

20 Q. Yes.

21 A. Mediation? The -- I was not part of the mediation.
 22 I think it's an established group. They had their own
 23 remit, own way -- they had their own decision maker.
 24 I was asked for a view and I provided a view, saying
 25 that the officer's report was a working document and it

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1 Then up, please, at the foot of the page, Rod
 2 replies:

3 "Having discussed [it], the protocol for the use of
 4 'officer's reports' ... by Project Sparrow Investigators
 5 when responding to individual complaints is:
 6 "The report is NOT to be exhibited OR expressly
 7 [referred to] in Post Office's formal response to
 8 a complaint.
 9 "It can be used by the Investigator to help them
 10 understand what happened in a particular case ...
 11 "If the report is the ONLY source document still
 12 available, the Investigator can repeat material from the
 13 report ...
 14 "Any challenge received about the source of
 15 a [statement] must be referred to Chris."
 16 So this is about what material Investigators
 17 constructing investigation reports can refer to in the
 18 context of the mediation, okay?

19 A. Yes.

20 Q. If we go up to the top of the page, please. You reply
 21 to that:

22 "Having looked at the papers. I have no doubt this
 23 is the correct decision not to [disclose] 'Officer
 24 Reports'. If in the case of *Hamilton* [Jo Hamilton]
 25 officers reports had been disclosed ..."

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1 I don't know what you're saying here but I think it
2 means that, if in the case of Jo Hamilton, had officers'
3 reports been disclosed, this would have been extremely
4 dangerous or it would have been an extremely dangerous
5 approach; is that right?

6 **A.** Yes.

7 **Q.** "In the [Jo Hamilton] case, in the officer's report, the
8 investigation officer said 'Having analysed the Horizon
9 printout and accounting documentation, I was unable to
10 find any evidence of theft or cash in hand figures being
11 deliberately inflated'.

12 "In the absence of a file to demonstrate how the
13 case developed, as it was further investigated, this
14 would give the applicant and Second Sight every
15 opportunity to ask why in fact [Jo] Hamilton was
16 prosecuted. In the absence of paperwork to deal with
17 this, this would in turn cause [the Post Office]
18 difficulties."

19 So, by this time, you had read the investigation
20 report into the investigations against Mrs Hamilton,
21 hadn't you?

22 **A.** No, this was -- I think there was different views on to
23 disclose it or not to close it. I'm just basically
24 highlighting to Chris and Jessica, my line manager,
25 Jessica Madron -- oh, Hugh Flemington has left and Chris

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1 **Q.** Mr Singh, you're talking about different things now,
2 whether you're part of the mediation and other issues,
3 all I'm doing is showing you your email, which has
4 a sentence in it, which is accurately quoted from the
5 Investigating Officer's report, and all I'm saying is:
6 by this date, 9 May 2014, you knew that Investigating
7 Officer's report contained that sentence, didn't you?

8 **A.** I don't recall. I mean that's just basically
9 illustrating a point, as helping Chris or Jessica to
10 make a decision. No more than that.

11 **SIR WYN WILLIAMS:** Mr Singh you couldn't have written that
12 unless you knew about it, could you?

13 **A.** Oh, no, I knew about it --

14 **SIR WYN WILLIAMS:** I think that's all Mr Beer was asking you
15 to confirm --

16 **A.** But I --

17 **SIR WYN WILLIAMS:** -- that, in order to write that, you
18 either had to have read it yourself or been told
19 verbatim what was included in the officer's report.
20 That's all he was asking you.

21 **A.** Sorry, sir. Yes. I've not read the report but, I mean,
22 I've -- it's there for a reason, yes.

23 **MR BEER:** You're giving that as a reason not to disclose
24 Investigating Officer's reports, aren't you? That's the
25 way you're deploying that.

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1 has replaced Ms Crichton. All, I'm doing is
2 highlighting different points of view and this is
3 an illustration as why, you know, you've got to weigh
4 these things up and ask them to make a decision, that's
5 all.

6 **Q.** You'd read the report because you quote from it.

7 **A.** I don't know how that came about but I don't recall
8 exactly how that came about, but that wasn't the
9 intention.

10 **Q.** Okay, I'll put it different way: you knew that the
11 investigation report contained the sentence "Having
12 analysed the Horizon printout, and accounting
13 documentation, I was unable to find any evidence of
14 theft", didn't you?

15 **A.** No, that was not the case. This is basically --

16 **Q.** Mr Singh, it's in black and white, or blue and red?

17 **A.** Yes, maybe but I'm trying to illustrate the point that
18 sometimes illustrating by example. That's all.

19 **Q.** Yes, and you plucked that example by either reading the
20 report or somebody telling you what was in the report?

21 **A.** No, I think the intention is basically here to
22 illustrate, now, look, Chris, Jessica, you're the
23 decision maker. You've got to weigh these things up.
24 One's saying to do it, one's saying not. I'm not part
25 of the mediation, I'm not the decision maker --

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1 **A.** I think what I'm saying is you've got to have the
2 paperwork to go with I. You can't just close it by
3 itself, and it's at the end of the day Chris and Jess to
4 make the decision.

5 **Q.** You're saying "We can't close these reports, if we did,
6 Jo Hamilton might ask, "Why was I prosecuted?"

7 **A.** Not at all. No, I disagree. That's not the case.

8 **Q.** What about the sentence "This would give the applicant
9 every opportunity to ask why, in fact, Hamilton was
10 prosecuted"?

11 **A.** No, I -- No. That wasn't the intention no.

12 **Q.** Why did you type those words?

13 **A.** I can't explain that now but, certainly, it was getting
14 a decision from Chris and Jessica to make, because there
15 was a counterargument put forward for civil and criminal
16 lawyers, I think.

17 **Q.** That's a reason to give disclosure to Jo Hamilton, isn't
18 it? Not a reason not to give disclosure to Jo Hamilton.

19 **A.** Well, the -- well, I -- I wasn't the decision maker.
20 I was not part of the scheme.

21 **Q.** If you just listen to the question: the fact that the
22 Investigating Officer's report recorded that they were
23 unable to find any evidence of theft is a reason to give
24 disclosure to Mrs Hamilton, not a reason not to give it
25 to her?

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1 A. Okay, I accept, maybe my mistake, I shouldn't have gone
2 in there but that wasn't what this is about.
3 Q. This is part of a cover-up --
4 A. No.
5 Q. -- isn't it?
6 A. There is no cover-up. On this email, one of, this is
7 an email for them, decision maker, to weigh things up.
8 As far as the disclosure is concerned, I had no problem
9 with any of it, because --
10 Q. You say at the end, "In the absence of proper paperwork,
11 this report will cause Post Office difficulties."
12 A. No. That is a complete file. What I'm saying is you
13 need to have a complete file to have a true picture of
14 what's going on.
15 **SIR WYN WILLIAMS:** Well, I'm sorry to join, so to speak, but
16 I had forgotten momentarily how you begin this email,
17 which is "Having looked at the papers". So does that
18 not make clear (a) there was a file, and, (b) you had
19 read it?
20 A. It's not the full file. I think, as you see from the
21 bottom of the chain of emails, there's certain
22 paperwork. I wasn't privy to the whole file. There's
23 certain paperworks, and I've been asked -- I've been
24 brought in to refer it to the decision makers, Jessica
25 and Chris, to make a decision.

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1 You say that you note that the advice suggested that
2 the 1 January 2010 be the start date for the review
3 process, and you either agreed with it at the time or,
4 if you had read it, you would have agreed with it,
5 correct?
6 A. I don't ... ooh. It was what was suggested, yeah.
7 Q. We're looking here at the issue of how far back the
8 Cartwright King look should go. How far back in time
9 should it go --
10 A. Yes.
11 Q. -- and the start date of 1 January 2010 that was
12 selected; yes?
13 A. Yes.
14 Q. You say that you either agreed with it at the time or
15 you would have agreed it was an appropriate starting
16 point, based on what was known at that time around the
17 Horizon issues, yes?
18 A. Yes.
19 Q. So, by this time, there was the Second Sight Interim
20 Report of 8 July 2013, which made reference to the
21 receipts and payments mismatch bug, the suspense account
22 bug and the Callendar Square or Falkirk bug, yes?
23 A. Yes.
24 Q. I've suggested to you that you had become aware of the
25 receipts and payments mismatch bug about two-and-a-half

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1 **SIR WYN WILLIAMS:** Carry on, Mr Beer.
2 **MR BEER:** I'm not sure I can carry on any further with
3 Mr Singh on this point.
4 **SIR WYN WILLIAMS:** Fine.
5 **MR BEER:** Can we move forwards, please, to the Cartwright
6 King review process and can we start, please, with
7 paragraph 71 of your witness statement. It's on page 26
8 of your witness statement.
9 A. Yes.
10 Q. You say:
11 "I am aware that at this time [that's mid-2013]
12 Simon Clarke at [Cartwright King] was advising [the Post
13 Office] on a number of matters, including disclosure and
14 expert evidence issues ... I agreed with Simon Clarke's
15 advice on these matters ... I can't recall whether
16 I received that advice but if I did, I ... would have
17 agreed it was an appropriate starting point based on
18 what was known at the time around the Horizon issues.
19 I noted this was to be kept under review. I note that
20 Simon Clarke advised on 19 July 2013 in relation to ...
21 miscarriages of justice. Again, I do not recall whether
22 I received that advice but for the avoidance of doubt
23 I had no experience in relation to that issue and
24 wouldn't have been in a position to agree or disagree
25 with his advice."

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1 years earlier on 8 October 2010, and you've, I think,
2 essentially denied that, yes?
3 A. Yes.
4 Q. We know that you were aware of the suspense account bug
5 by at least 27 July 2013 -- we looked at an email
6 exchange earlier and you agreed that -- and that you
7 were aware of the Callendar Square bug about two and
8 a half years earlier, at the time of the *Misra* trial in
9 October 2010, where it was actually raised in court,
10 yes?
11 A. Yes.
12 Q. So you were aware that one of the bugs affected branches
13 before 1 January 2010, correct; the Callendar Square
14 bug?
15 A. Yes.
16 Q. Do you agree that selecting the start date of 1 January
17 2010 would do nothing to address potentially unsafe
18 convictions that had occurred before that date?
19 A. I wasn't part of the review. I wasn't the decision
20 maker. It's something General Counsel and the Head of
21 Legal were getting advice from and progressing it.
22 I wasn't part of the review because of the independency
23 element of it. So I'm just an observer as to what date
24 they decided to do, and wasn't part of that.
25 Q. But do you agree, as a matter of fact, as a matter of

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1 logic, that selecting the start date of 1 January 2010
 2 would do nothing to address any potentially unsafe
 3 convictions --
 4 **A.** Yes.
 5 **Q.** -- that had occurred before that date?
 6 **A.** But I wasn't the decision maker. I didn't make the
 7 decision that it's going to be 1 January 2010 because
 8 I wasn't part of the review and it was for the decision
 9 maker to make a decision in light of what advice they'd
 10 been given.
 11 **Q.** Did you pipe up and say, "Hold on, I've got knowledge of
 12 a bug that occurred and could have afflicted
 13 subpostmasters before 1 January 2010"?
 14 **A.** I didn't have any knowledge of it. I said to you that
 15 whatever I knew, they knew.
 16 **Q.** The Callendar Square, the Falkirk bug, from at least
 17 2006?
 18 **A.** I think everybody is aware of it because, I think by
 19 then, that was common knowledge that that was coming up
 20 over and over again, everywhere.
 21 **Q.** What about this then: you had seen the advice which that
 22 said that, in summary, Mr Jenkins was a witness upon
 23 whom reliance could not be placed, he was a tainted
 24 witness, yes?
 25 **A.** Yes.

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1 like, the senior members of the Legal Team were dealing
 2 with. I don't think I knew anything about any of this.
 3 **Q.** Can we look, please, at POL00148714. Can we start by
 4 looking at page 4, please. If we scroll down, please.
 5 It's an email -- sorry, can we just look a bit below,
 6 and again. Okay, just up to the email, please.
 7 An email from Mr Parsons in July 2014 to you and
 8 others:
 9 "My thoughts ..."
 10 This is on the instruction of a new expert:
 11 "A key question appears to be whether ICL ..."
 12 In this context, that's Imperial College London,
 13 yes?
 14 **A.** Yes.
 15 **Q.** "... look at old Horizon as well as Horizon Online. My
 16 guess is that [the Post Office] won't be looking to
 17 prosecute any old Horizon cases so we can focus on
 18 [Horizon Online]. Martin/Jarnail?
 19 "As to access to [Second Sight] material, I can't
 20 see in principle any issue with this. Material going to
 21 [Second Sight] has been largely vetted already.
 22 However, Martin/Jarnail -- could you confirm whether
 23 an expert under criminal law has to disclose all
 24 material instructions or source material in their
 25 report. In the civil process the general rule is that

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1 **Q.** You knew that he had given witness statements in cases
 2 before 1 January 2010, didn't you?
 3 **A.** Yes. Yes, I did.
 4 **Q.** Did you put these two pieces of knowledge together?
 5 **A.** I didn't consider it. I wasn't part of any of this.
 6 That wasn't my role. As I said to you, I was not part
 7 of the mediation, all this advice is taken --
 8 **Q.** This isn't about the mediation, this is about the
 9 Cartwright King review --
 10 **A.** No, I wasn't --
 11 **Q.** -- of potentially unsafe convictions?
 12 **A.** Yes, but, as I said, this is a matter which the General
 13 Counsel and the Head of Legal are seeking directly from
 14 Cartwright King and taking their advice on. I don't
 15 think I was privy to any of it and, as to what and what
 16 not they were deciding. It was a matter for these
 17 decision makers.
 18 **Q.** Was there a belief in the Post Office, of which you were
 19 aware, that very great difficulties might be caused for
 20 the Post Office if there was an examination of the
 21 existence of bugs before 1 January 2010 and that the
 22 disclosure that the Post Office had given or not given
 23 about such bugs?
 24 **A.** I wasn't part of any of this. This is outside of my
 25 role, outside my remit. It was something that, if you

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1 the expert must disclose to the court and the other side
 2 pretty much everything they have considered in forming
 3 their opinion. If this applies equally to criminal
 4 procedure, then [Cartwright King]/[the Post Office] may
 5 wish to vet material before sending it to [Imperial
 6 College London].
 7 "We may want to explore what [Imperial College
 8 London] intend to investigate under the 'fitness for
 9 purpose' heading. This could be as simple as 'does
 10 Horizon provide the necessary functionality?'. Or it
 11 could go wider into 'does Horizon provide a good user
 12 experience?'. From handling IT disputes in the past
 13 I know that determining the quality of user experience
 14 can be a very subjective question, that is difficult to
 15 answer."
 16 If we scroll up, please. Mr Smith advises:
 17 "I would not advise that the experts be instructed
 18 to look at the old Horizon system."
 19 You're in copy on this.
 20 **A.** Yes.
 21 **Q.** "If the experts were to considered old system, depending
 22 on their findings, disclosure issues could arise in
 23 historic cases."
 24 Just stopping there, were you concerned at this
 25 point, mid-2014, that, if the new experts, proposed

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1 experts, were to look at old Horizon, disclosure issues
2 might arise?

3 **A.** No, all I was concerned with the independency of it,
4 that they get full access from the Post Office and
5 Fujitsu to make sure that they carry out independent
6 review of it. I mean, that's the whole point of the
7 independency. I don't think I put my mind to whether
8 they looked at the old system or the new system.
9 Obviously, the new system because I think the Post
10 Office wanted to consider the investigation and
11 prosecution side of things. I don't think I set my mind
12 on it. I think it's Martin mentioned it because they're
13 reviewing the cases and they are prosecuting them.
14 I was completely hands off. I'm here to progress the,
15 you know, the report; nothing more than that.

16 **Q.** What do you think Mr Smith is referring to here,
17 "disclosure issues in relation to historic cases"?

18 **A.** I think you need to ask Mr Smith. I honestly don't
19 know.

20 **Q.** We had a go at that earlier in the week but I'm asking
21 you?

22 **A.** I don't know because I know my -- from Jessica and Chris
23 was, "Look, Jarnail, you need to progress this".
24 I think Susan started it and it's just taken a long,
25 long time to get here. So all I was concerned with was

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1 **Q.** Was there a nervousness that, if we get the experts to
2 look back too far, they may discover bugs that will
3 cause us disclosure problems?

4 **A.** Certainly not on my part, no.

5 **Q.** Therefore, the Post Office shouldn't look too hard at
6 that question now unless they needed to do so in order
7 to prosecute new claims or prosecute in the criminal
8 courts new cases based on old Horizon?

9 **A.** No, no.

10 **Q.** If we go up, please, and then keep going, to page 1.
11 Sorry, it's the email at the foot of the page. You say:

12 "Let us not lose sight of the fact Cartwright King
13 are specialist criminal lawyers. They are in a far
14 better position to advise [the Post Office] with regards
15 to expert instructions. They are acting in best
16 interests of their clients ie [the Post Office] and the
17 way in which the report is being commissioned preserves
18 the independence and integrity of the experts.

19 "It is intended to instruct the expert to prepare
20 the report in accordance with the scope but with the
21 proviso that they immediately notify Cartwright King of
22 anything which may cause [concern]."

23 Scrolling down, please, paragraph 8:

24 "Let us not lose sight of the fact it is in [the
25 Post Office's] wider interest to get the report (and

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1 getting ICL and getting the budgetary sorted out in line
2 with the instructions from Chris and Jessica. I wasn't
3 considering as to any more than that.

4 **Q.** He continues:

5 "In criminal law instructions and material provided
6 to an expert must be listed", et cetera.

7 "[Cartwright King] would not wish to vet information
8 prior to sending it to [Imperial College London]; it
9 would be counterproductive to withhold information. The
10 experts may well refer to such attempts and missing
11 information in the report. This would devalue the
12 report and make it easier for defendants to challenge."

13 Then scroll up, please. You reply:

14 "I agree with Martin. [The Post Office] cannot be
15 seen to [I think you mean 'cherry-pick'] to be
16 [cherry-picking] the information provided to the experts
17 or withholding the information. Experts are independent
18 and [the Post Office] cannot be seen to be trying to
19 influence the experts."

20 **A.** Yes, well, there you go. Mm.

21 **Q.** Was there a nervousness that there were bugs that were
22 operative in Horizon before 1 January 2010?

23 **A.** Certainly not. It had just taken such a long time for
24 them to make a decision to get an expert in or find an
25 expert and it's just helping to progress it.

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1 Fujitsu) which gives the Horizon a clean bill of
2 health."

3 In paragraph 6, you said, if there are any
4 concerns -- sorry, in paragraph -- scroll up a little
5 bit further. Paragraph 2, you say:

6 "It is intended to instruct the expert to prepare
7 the report in accordance with the scope ... with the
8 proviso that they immediately notify [Cartwright King]
9 of anything which will cause [the Post Office] concern.
10 It will enable the process to be terminated without full
11 costs being incurred."

12 Was it your intention that, if the expert discovered
13 something of concern, about Horizon, their appointment
14 would be terminated?

15 **A.** No, no, no. I think there was a concern about cost and
16 scope, and --

17 **Q.** This isn't about scope.

18 **A.** Well, that's my understanding of it. I think there was
19 some discussions and I'm trying to recap or summarise
20 what's going on. No, that wasn't -- it was just,
21 basically, the independency of it, and that, you know,
22 the Post Office is kept away from it and it's a matter
23 of Cartwright King dealing directly with the experts.

24 **Q.** Paragraph 2 says that, if the expert finds anything
25 which may cause the Post Office concern, they're to tell

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1 the prosecution solicitors, which will enable the
 2 process to be terminated.
 3 **A.** Well, that's wrong. That's not what the intention was.
 4 Obviously --
 5 **Q.** Tell us in which way the words need to be rearranged in
 6 order to give them a different meaning?
 7 **A.** I can't -- I don't know what it -- in that -- I'm trying
 8 to get the independency of it -- POL away from it and
 9 you've got independency of a third party dealing with
 10 them directly rather than POL. That's all.
 11 **Q.** Your concern was that, if the expert told the Post
 12 Office something uncomfortable, they'd either be told to
 13 stop looking or their appointment would be terminated?
 14 **A.** No, absolutely not. I don't think that was the
 15 intention --
 16 **Q.** What does that paragraph mean, then?
 17 **A.** I don't know what it means but it was that -- that --
 18 **Q.** Who wrote it?
 19 **A.** Well, certainly, I did. But that's the -- that's not --
 20 what it means is keep the independency of it, keep it
 21 away from the Post Office, and the integrity of the
 22 report and the independency and, if there is something
 23 they need, they need to go to Cartwright King to
 24 progress it. No more than that.
 25 **Q.** If that's what it meant, why didn't it just use the

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1 **MR BEER:** Yes, thank you, sir.
 2 From paragraph 94 onwards, you deal with the issue
 3 of the appointment of an expert. In 94 you refer to the
 4 documents that you have considered. In 95, you say:
 5 "I recall that I had some involvement in seeking
 6 a new expert to opine on the integrity of [Horizon]."
 7 You didn't draft a document but you were asked by
 8 Susan Crichton or Hugh Flemington to seek Board
 9 approval. That was something you hadn't done before.
 10 Then a little further on, in 96, you say:
 11 "... I can see there is reference to arrangements
 12 for a meeting", you can't recall attending.
 13 It took a long time to get new experts:
 14 "I can see that I was involved in seeking approval
 15 from Chris Aujard, General Counsel ..."
 16 97:
 17 "I have been asked to what extent, if at all, did
 18 I agree with [Martin Smith's] advice not to investigate
 19 ... Horizon cases due to concerns that 'disclosures
 20 issues could arise in historic cases'.
 21 You say:
 22 "I recall that I was primarily concerned that the
 23 experts would have access to [all] the information they
 24 felt they needed ... That was the reason for my email
 25 ..."

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1 words that you have described?
 2 **A.** I wish I had.
 3 **Q.** Yes, but high, didn't you?
 4 **A.** I don't know. I can't recall. It's a while ago.
 5 **Q.** Is the true answer to that because the words that you
 6 used disclosed your true approach at the time, namely
 7 the Post Office does not wish to discover anything wrong
 8 with Horizon?
 9 **A.** No, no.
 10 **Q.** If anyone starts to find things wrong with Horizon we'll
 11 terminate their appointment?
 12 **A.** No.
 13 **Q.** You tell us, in your witness statement, it's
 14 paragraphs 94 onwards, which is on page 34, whilst
 15 that's being turned up, sir, I should have told you at
 16 the outset that none of the Core Participants wish to
 17 ask questions of Mr Singh.
 18 Sorry, I've been given some new information.
 19 Update on that: one Core Participant has asked to
 20 ask some questions, which I can't imagine will take that
 21 long and, therefore, I propose to go straight through
 22 and then we'll finish well before 3.30.
 23 **SIR WYN WILLIAMS:** Right. Fine. Obviously, I will hold
 24 everyone to that, not least in the interests of the
 25 transcriber.

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1 98:
 2 "My recollection was that the experts were being
 3 instructed in respect of the integrity of the current
 4 system."
 5 Can we look, please, at POL00147068, page 2 to start
 6 with, please, and an email from you to Mr Flemington, if
 7 we scroll up a little bit, so we can see the top bit.
 8 From you to Mr Flemington, in December 2013:
 9 "We have identified two experts, as the ideal
 10 candidates for the role.
 11 "[I think they will] Provide a validated opinion as
 12 to the present integrity of the system so as to lay to
 13 rest the present concerns relating to the integrity of
 14 Horizon Online ..."
 15 Why did you say that the potential expert would
 16 speak to the present integrity of the system so as to
 17 lay to rest the present concerns?
 18 **A.** I don't honestly --
 19 **Q.** In framing it that way, do you accept that you were
 20 effectively foreshadowing the opinion?
 21 **A.** No, I don't --
 22 **Q.** Setting out what you were looking for?
 23 **A.** I wasn't looking at anything. I wish I knew to explain
 24 that to you very clearly. Certainly, all I was
 25 concerned with is trying to get an expert, because it's

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1 just taken a long time to get anything off the ground.
 2 I mean, in the end of the day, I think we just basically
 3 gave up because the Post Office didn't want -- they
 4 wanted it, they didn't want it. So those are the
 5 matters. You really need to have Mr Flemington, or
 6 Susan Crichton, or Chris here, because I can't help you
 7 with that. All I've done is they asked me to get the
 8 expert -- independency expert as to the integrity of the
 9 system, that's all I'm doing.

10 I'm not doing anything more than that. Maybe it is
 11 wrong here but that's not what it is. What you're
 12 suggesting is not true.

13 **Q.** Did you disclose, to the putative new experts, the
 14 expert evidence that had been given by Mr Jenkins
 15 previously?

16 **A.** It didn't even get that far. I mean, I -- I mean, it
 17 didn't even get very far. I mean, it used to -- it's
 18 stop/start, stop/start, sort of system. Post Office
 19 wanted it, they didn't want it, and I'm just going by
 20 whatever I've been told by Hugh Flemington to do or not
 21 to do. It's more -- nothing more than that.

22 **Q.** Can I look at it from a different angle, then. Can we
 23 look at POL00139879. Do you see this is an attendance
 24 note of a meeting in Scotland, firstly, with BTO
 25 solicitors and then, secondly, with the Procurator

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1 "[Simon Clarke] provided the meeting with a broad
 2 overview of the [Horizon Online] difficulties (absent
 3 any direct or indirect reference to the role of [Gareth
 4 Jenkins] or Fujitsu)."

5 Can you see that?

6 **A.** Yes, yes.

7 **Q.** Then paragraph 13, over the page, please.

8 "[Simon Clarke] then outlined the proposed
 9 instruction of independent expert witnesses and the
 10 scope and depth of [these] experts' [reports]. PM ..."

11 I've forgotten who that is. If we scroll back.
 12 Paul Miele, thank you, from the Procurator Fiscal. Back
 13 to 13, please:

14 "[Mr Miele] indicated surprise at the seriousness
 15 and depth to which [the Post Office] was prepared to go
 16 in dealing with the [Horizon Online] issues and was
 17 clearly appreciative of the approach being taken. He
 18 suggested that the matters outlined went a long way
 19 towards meeting the [Procurator Fiscal's] concerns as to
 20 both present and future prosecutions."

21 At this meeting, why did you not disclose to the
 22 Procurator Fiscal and to BTO that there had been
 23 a problem with Gareth Jenkins' evidence in past
 24 prosecutions?

25 **A.** I was asked by Susan to go along with it -- go along for

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1 Fiscal in Edinburgh?

2 **A.** Yes, yes, I -- yes.

3 **Q.** Were you present at this?

4 **A.** I was present on the 5th not the 4th.

5 **Q.** You were present on the 5th but not the 4th?

6 **A.** Yeah, I don't think I was -- I think they had --

7 Cartwright King and BTO probably met the day before,
 8 I think.

9 **Q.** Can we go, then, to page 3, please.

10 **A.** Yeah, there we go.

11 **Q.** This is the record of that meeting on the 5th --

12 **A.** Yes.

13 **Q.** -- and we can see that you're present.

14 **A.** Yes.

15 **Q.** We can see who else is present: two from Cartwright
 16 King; two from BTO; one from Post Office, you; and two
 17 from the Procurator Fiscal.

18 **A.** Yes.

19 **Q.** Was this meeting, looking at it broadly, in response to
 20 the Procurator Fiscal's initial view that all Post
 21 Office cases should be terminated because they couldn't
 22 prove Horizon was wholly reliable?

23 **A.** Yes, yes.

24 **Q.** Can we go forward to paragraph 12 of the meeting note,
 25 please. Thank you. In the second sentence it says:

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1 the meeting but I didn't know the ins and outs, as to
 2 how the review was going or I had any -- I wasn't privy
 3 to any information further than that. I mean, Simon
 4 Clarke's, a senior barrister, and I went long and
 5 I think -- I don't think I said very much. I just
 6 introduced them to them, who they were, and just left
 7 it -- him to explain everything.

8 **Q.** So if we go back to paragraph 12, please. You'll see in
 9 the brackets there --

10 **A.** Yes, I can see that.

11 **Q.** -- a note is made that Horizon Online difficulties were
 12 referred to absent any direct or indirect reference
 13 Gareth Jenkins or Fujitsu. Was there a desire to keep
 14 that secret?

15 **A.** Not on my part. I don't know anything about this. You
 16 probably need to ask Simon when he comes to talk to you
 17 but I don't --

18 **Q.** Did you tell the Procurator Fiscal why the Post Office
 19 needed to instruct new experts, ie what was wrong with
 20 the old one?

21 **A.** I -- as I said, I don't think I said very much here
 22 apart from the introductions.

23 **Q.** Did anyone say what was wrong with the old expert and
 24 why new experts needed to be instructed?

25 **A.** I can't recall, but it was basically Simon and Martin

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1 I think, they were leading it.

2 **Q.** Did anyone disclose the Simon Clarke Advices, the whole
3 string of them?

4 **A.** I don't know. I'm not -- I don't recall but I mean I --
5 they might have done. They had a meeting prior to me
6 going there. I just went along because Susan asked me
7 to, you know, attend and, I mean, that's what
8 I basically did. I didn't take any part. I wasn't
9 privy to much information. I mean, if they asked any
10 point or Post Office view, I probably -- I don't know
11 what more I could have given but, certainly, I don't
12 even know what discussions Susan and Cartwright King
13 had, or BTO had, and I was just an attendee, observer.
14 I mean, I don't know any more than that. I can't help
15 you with that any more.

16 **Q.** To your knowledge, did anyone draw to the Post Office
17 Board's attention the Simon Clarke Advice of 15 July
18 2013 concerning Mr Jenkins' reliability?

19 **A.** I had no dealings with the Board, very little dealing --
20 I don't think I had any dealing with the Board. I don't
21 think I even met any Board members. I mean, obviously
22 Chris used to report -- or, you know, the -- you know,
23 the senior legal teams.

24 **Q.** Was there any discussion between you that --

25 **A.** No.

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1 subpostmasters had been prosecuted?

2 **A.** I dealt with my cases but, as I said to you, the Head of
3 Criminal Law, Rob Wilson, wasn't very good at declaring
4 information and I think he was the contact within the
5 greater business and I -- as I said to you, apart from
6 him, I don't know any members of the Board, I don't know
7 any -- anybody within the business that much because
8 I didn't have that much contact --

9 **Q.** In all of your time was there no discussion, "Aren't the
10 Board interested in this?", or, "Why haven't I been
11 asked to contribute towards a Board paper which sets out
12 what's gone on here?"

13 **A.** What, do you mean in the Royal Mail Group?

14 **Q.** Yes.

15 **A.** No, there was Rob Wilson, I said he was the contact
16 within the business. I don't know who the Board members
17 were.

18 **Q.** I'm not asking you whether you knew who the Board
19 members were; I'm asking you, as a person --

20 **A.** Well, if I don't know them, I can't have a discussion
21 with them, can I? But no --

22 **Q.** I wasn't asking you whether you had a discussion. I was
23 asking you were you not querulous, were you not
24 wondering to yourself, "Hold on, some things have been
25 discovered here that have gone badly wrong? Does our

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1 **Q.** -- "This is so serious" --

2 **A.** It is serious, I agree.

3 **Q.** -- "the Post Office board need to know about this"?

4 **A.** I'm -- as I said, I'm a criminal lawyer and my job is,
5 as you described it, is a postbox, which I agree with.
6 And, you know, that's all it is. But I wasn't privy to
7 any of it. These are high level discussions as to what
8 was disclosed and who it was disclosed to, who knew
9 what, when. I have no idea. I can honestly say that.
10 I'm on oath and I'm telling you that. I'm staggered as
11 to hear what you're telling me.

12 **Q.** Was it thought of as a dirty secret?

13 **A.** Not on my part. I didn't know any dirty secrets.

14 **Q.** It shouldn't be revealed to the board nor should it be
15 revealed to the Scots?

16 **A.** Well, I think you've been talking to senior members of
17 the team. They're the ones that are privy to it,
18 I think you need to maybe call them in and discuss that
19 with them again because, certainly, I can't help you
20 with that.

21 **Q.** Many of the prosecutions had occurred on your watch,
22 hadn't they?

23 **A.** How do you mean?

24 **Q.** Well, whilst you had been a criminal lawyer at Royal
25 Mail Group and then at the Post Office, a number of

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1 Board know about this? Why haven't I been asked to
2 contribute to a Board paper or some briefing of some
3 very senior people who want to know what's gone on
4 here"?

5 **A.** I wasn't asked and I don't think I thought very much
6 about it because I didn't know much about any of it,
7 what was going on. I mean, I basically was a criminal
8 lawyer dealing with the cases, as and when they were
9 allocated to me, mostly with direction as to, you know,
10 what to do on them. No more than that.

11 **MR BEER:** Mr Singh, on that note, they're all the questions
12 I have to got to ask you. Thank you.

13 Sir, I think it's the Hudgells team and up to ten
14 minutes, sir.

15 **SIR WYN WILLIAMS:** Rightio.

16 **Questioned by MS PATRICK**

17 **MS PATRICK:** Good afternoon, Mr Singh. My name is Angela
18 Patrick and I represent, together with Tim Moloney KC,
19 a number of subpostmasters who were prosecuted and have
20 since had their convictions quashed, including
21 Mrs Hamilton, who I'm sure you can see sitting next to
22 me today.

23 **A.** Yes, I can. Yes.

24 **Q.** We only want to ask you about one issue and it's about
25 the handling of criminal prosecutions which were live at

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1 the time of the publication of the Second Sight review,
 2 the first Interim Report. Did you see the evidence of
 3 Mr Martin Smith yesterday?
 4 **A.** I heard, yes.
 5 **Q.** You remember we were talking then yesterday, in
 6 questions to him, about how, in July 2013, immediately
 7 before the publication of the Second Sight Report and at
 8 a time when it was known to the Post Office that it
 9 would identify at least some bugs in Horizon, do you
 10 remember then that there was a case of *Samra* that was
 11 due to come on for a hearing?
 12 **A.** Yes.
 13 **Q.** Do you remember agreeing with Mr Smith and Mr Clarke
 14 that they would contact Gareth Jenkins before that
 15 hearing came on?
 16 **A.** I don't think I -- no, no.
 17 **Q.** If Mr Clarke had made a note of your agreement that they
 18 should do that, a contemporaneous note, would you accept
 19 it was likely to be correct?
 20 **A.** All I can remember about that case was dealt with by the
 21 Head of Legal, Hugh Flemington. I had very, very little
 22 to do with it because I don't know the ins and outs of
 23 it, as to the reason for it, but I can't really help you
 24 or assist you more than that.
 25 **SIR WYN WILLIAMS:** I don't think Ms Patrick is asking you
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1 to be correct?
 2 **A.** Well, it's correct in the sense that I didn't make the
 3 decision. He advised the Post Office. The decision
 4 maker, the Head of Legal, Hugh Flemington, did that.
 5 But, I mean, I wasn't privy to the advice.
 6 **Q.** Can we just look at the note. It may be helpful.
 7 **A.** Okay.
 8 **Q.** It's POL00172804. It may help your memory, Mr Singh.
 9 We're looking at page 7, paragraph 16, please. This is
 10 Mr Clarke writing.
 11 "In this case I took the view that such an approach
 12 [an application for public interest immunity] to the
 13 problem might be appropriate. Accordingly Martin Smith
 14 and I, in conjunction with Jarnail Singh, decided that
 15 the best forward was to: 1) seek a ruling (ie the grant
 16 of a PII [public interest immunity] certificate) from
 17 the trial judge that we need not disclose to the defence
 18 the fact that the Second Sight Report was to be
 19 presented to Parliament today; and that the report
 20 contained references to the existence of bugs in Horizon
 21 both past and present; and 2) to adjourn the trial", and
 22 so on.
 23 You see there that Mr Clarke has made a note that
 24 the decision is made with him, Mr Smith, and "in
 25 conjunction with Jarnail Singh"; do you see that there,
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1 about the case. She's just using that as a point of
 2 reference to ask you about a discussion you may have
 3 had.
 4 **A.** I can't recall, to be honest. I don't know --
 5 **MS PATRICK:** I'm very grateful to the Chair but I think it's
 6 even simpler.
 7 **A.** Okay.
 8 **Q.** You knew Mr Clarke and you'd worked with him for a long
 9 time?
 10 **A.** Yes, I did. Yes.
 11 **Q.** If he made an attendance note at the time that said you
 12 agreed to something that he and Mr Smith had suggested,
 13 would you expect that to be correct?
 14 **A.** Of course, yes.
 15 **Q.** Thank you. So 1 July, *Samra* is coming on for trial. Do
 16 you recall agreeing that there would be an application
 17 for a public interest immunity certificate to prevent
 18 disclosure to the defence of the fact that the Second
 19 Sight Report was to be presented to Parliament, and that
 20 that report contained references to bugs in Horizon?
 21 **A.** That was a matter for my line manager, Hugh Flemington,
 22 who had made the decision. I didn't make any decisions.
 23 **Q.** Again, if Mr Clarke had made a note of your agreement
 24 that they, Mr Clarke and Mr Smith, should make just such
 25 an application, would you accept that it would be likely
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1 Mr Singh?
 2 **A.** Yes, I do. It's very clear, yes.
 3 **Q.** There's no reference to Hugh Flemington, is there?
 4 **A.** Well, I'm not the decision maker. I don't know how
 5 I came about. Certainly, Hugh Flemington is the
 6 decision maker. I don't know how that fits into it.
 7 I don't even know what that certificate is because I'm
 8 not that well knowledgeable about these things and,
 9 obviously, the Post Office and the decision maker have
 10 decided to instruct Mr Clarke to make such
 11 an application.
 12 **Q.** You've accepted that you knew Mr Clarke. If he made
 13 a note at the time, it's likely that that would be done
 14 correctly?
 15 **A.** Yes, yeah. But it wasn't --
 16 **Q.** Just to explore your recollection, it might be able to
 17 help your memory, but can you recall, looking at this,
 18 what the basis for the application for public interest
 19 immunity was to be?
 20 **A.** I don't recall. I don't know.
 21 **Q.** You, at this point, are a very experienced solicitor.
 22 An application for public interest immunity in criminal
 23 proceedings is a very serious step, isn't it?
 24 **A.** It probably is but my understanding was limited. It's
 25 something that senior counsel is leading on instructions
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1 from the Post Office Senior Legal Team, like Hugh
 2 Flemington and, probably, you know, the General Counsel.
 3 **Q.** Now, if I suggest to you that the basis for such
 4 an application is very limited and it must engage very
 5 serious matters of public interest, in order to withhold
 6 material from the defence and from the public eye,
 7 serious things such as national security, would you
 8 accept that's a rough explanation for what a public
 9 interest immunity application might be about?
 10 **A.** Well, certainly, yes. But, I mean, I wasn't privy to
 11 the case. It's not one of my cases I'm dealing with.
 12 It's something -- the decision has been made and
 13 Mr Clarke and Mr Smith are dealing with it. I'm more or
 14 less -- I don't know what my involvement in it was
 15 because I don't know any details as to the application.
 16 **Q.** Well, we can talk to Mr Clarke about his note and he
 17 here records that the decision was made in conjunction
 18 with you. So can we just look at the reasons for the
 19 application, just to see if it prompts your memory,
 20 Mr Singh.
 21 If we could look at page 9, at paragraph 24, please.
 22 Thank you very much. Here we see Mr Clarke records his
 23 reasons:
 24 "Finally, it is worth commenting on the reasoning
 25 behind my advice that we seek a PII [public interest
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1 **A.** Yeah?
 2 **Q.** Mr Singh, we have this note. We have Mr Clarke
 3 recording it's a decision made in conjunction with you.
 4 Was this is an example of you seeking to cover up things
 5 if you could?
 6 **A.** I'm not seeking to cover up anything. I don't know the
 7 ins and out of this and, in all seriousness, this is
 8 a matter you need to discuss with Mr Clarke and the
 9 senior Legal Team. I am purely there on instruction --
 10 on whatever I've been asked by my line manager, Hugh
 11 Flemington or -- whoever it is, Jessica or Hugh
 12 Flemington -- to have an input in whatever they decide
 13 to do. I mean, I couldn't say, "Look, I disagree with
 14 that, I'm not going to do this". So I ...
 15 **Q.** Mr Singh, can I stop you there for a moment.
 16 **A.** Yeah.
 17 **Q.** At this point, 2013, you're the sole criminal specialist
 18 at Post Office, aren't you?
 19 **A.** I'm a criminal lawyer but I wouldn't say I'm
 20 a specialist with experts particularly.
 21 **MS PATRICK:** Thank you. I don't have any more questions for
 22 you, Mr Singh. Thank you very much.
 23 **SIR WYN WILLIAMS:** Thank you, Ms Patrick.
 24 That's it, Mr Beer?
 25 **MR BEER:** Yes, sir, it is.
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1 immunity] certificate in this case. POL were, rightly
 2 in my opinion, very concerned at the potential adverse
 3 publicity which would inevitably have been generated by
 4 the revelation of the existence of a (draft) Second
 5 Sight Report into Horizon. To permit this information
 6 to enter the public domain at such an early stage would
 7 have been to encourage extremely unhealthy and likely
 8 virulent speculation as to the content of any report,
 9 most probably in the national press. Such speculation
 10 would have seriously damaged the reputation of [Post
 11 Office] and would have greatly undermined public
 12 confidence in both [Post Office] and [Post Office]
 13 systems. Our objective was to avoid such consequences:
 14 that objective we achieved."
 15 "Our objective was to avoid such consequences"; was
 16 that a proper basis for an application for public
 17 interest immunity, Mr Singh?
 18 **A.** I've got no knowledge about these things. I'm probably
 19 like an article clerk sitting behind senior counsel who
 20 is on top of his game but that's a decision made by the
 21 Post Office on advice, and I've been -- as a criminal
 22 lawyer, I've been advised to assist but I don't know the
 23 ins and outs of this particular case because it's not
 24 something I advised on or dealt with.
 25 **Q.** Mr Singh?
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1 **SIR WYN WILLIAMS:** Thank you for making two witness
 2 statements, Mr Singh, and for making yourself available
 3 on two separate occasions to be questioned. I am
 4 grateful to you for your participation in the Inquiry.
 5 **THE WITNESS:** Thank you, sir. Thank you.
 6 **SIR WYN WILLIAMS:** So we'll adjourn now until Tuesday at
 7 9.45, Mr Beer?
 8 **MR BEER:** Yes, that's right, sir.
 9 **SIR WYN WILLIAMS:** Fine. All right, then.
 10 **MR BEER:** Thank you very much, sir.
 11 (3.17 pm)
 12 (The hearing adjourned until 9.45 am on Tuesday, 7 May 2024)
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