

Tuesday, 16 July 2024

1
2 (9.45 am)
3 **MR BEER:** Good morning, sir. Can you see and hear us?
4 **SIR WYN WILLIAMS:** Yes, I can, thank you.
5 **MR BEER:** Sir, can I ask that Mr Dunks isn't sworn for the
6 moment. I know that his legal representative wants to
7 provide me with a piece of paper that sets out
8 a correction that Mr Dunks wants to make to his witness
9 statement and he hasn't given me that yet.
10 **SIR WYN WILLIAMS:** That's fine.
11 (Pause)
12 **MR BEER:** Can I call Andy Dunks, please.
13 **SIR WYN WILLIAMS:** Yes.
14 **ANDREW PAUL DUNKS (re-sworn)**
15 **Questioned by MR BEER**
16 **MR BEER:** Good morning, Mr Dunks, my name is Jason Beer and
17 I ask questions on behalf of the Inquiry. Before I ask
18 you those questions there's a matter that the Chairman
19 will raise with you.
20 **SIR WYN WILLIAMS:** Mr Dunks, under our law, a witness at
21 a public inquiry has the right to decline to answer
22 a question put to him by Counsel to the Inquiry, by any
23 recognised legal representative or by me, if there is
24 a risk that the answer to that question would
25 incriminate the witness. This legal principle is known

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1 **SIR WYN WILLIAMS:** Thank you very much.
2 Over to you, Mr Beer.
3 **MR BEER:** Thank you, sir.
4 Mr Dunks, can you, give us your full name, please?
5 **A.** Andrew Paul Dunks.
6 **Q.** You last gave evidence on 8 March 2023 for half a day
7 before the weather interrupted us in Phase 3 of the
8 Inquiry. Since then you have prepared a second witness
9 statement, the URN for which is WITN00300200. It's
10 69 pages long and it's dated 24 May 2024. I think there
11 are two corrections that you wish to make to it; is that
12 right?
13 **A.** Yes.
14 **Q.** Can we deal with the first of them, which is more
15 substantial, by looking at page 23 of the witness
16 statement. If that could be brought up on the screen,
17 so second witness statement, page 23, and if you look in
18 the hard copy in front of you. Have you got that?
19 **A.** I've got it here, not (*unclear*) in front.
20 **Q.** Paragraph 77, if we scroll down, please. You say in
21 that paragraph:
22 "I do not know why system event logs were not
23 supplied as part of the ARQ process."
24 Is there a correction which you wish to make to
25 that?

3

1 in shorthand form as the privilege against
2 self-incrimination.
3 I take the view that fairness demands that I remind
4 you of that privilege before you give your evidence. If
5 at any stage you wish to rely upon that privilege,
6 however, it is for you to alert me of that fact.
7 If, therefore, any questions are put to you by any
8 of the lawyers who ask you questions, or by me, which
9 you do not wish to answer on the ground that to answer
10 such a question might incriminate you, you must tell me
11 immediately after the question is put to you. At that
12 point, I will consider your objection and thereafter
13 rule upon whether your objection to answering the
14 question should be upheld.
15 Now I think I understand correctly that you are
16 represented today by lawyers at the Inquiry; is that
17 right?
18 **THE WITNESS:** Yes.
19 **SIR WYN WILLIAMS:** So if the issue relating to
20 self-discrimination arises and you wish them to assist
21 you, and if at any stage during the questioning you wish
22 to consult your lawyers about the privilege, you must
23 tell me so that I can consider whether that is
24 appropriate. Do you understand all that, Mr Dunks?
25 **THE WITNESS:** I do, yes.

2

1 **A.** Yes, there is.
2 **Q.** I'm going to read it out at dictation speed, it's quite
3 long.
4 Do you wish to make the following correction:
5 "I have now been shown records which indicate that,
6 as part of the ARQ process, the CSPOA Security Team,
7 including me, supplied the system events log to the SSC
8 to check them for any financial implications ..."
9 Then you give a reference, eg FUJ00186421. Then you
10 add:
11 "... though I now have no recollection of this."
12 **A.** Correct.
13 **Q.** Is that the correction you wish to make?
14 **A.** It is, yes.
15 **Q.** So:
16 "I have now been shown records which indicate that,
17 as part of the ARQ process, the Security Team, including
18 me, supplied the system events log to the SSC to check
19 them for any financial implications, though I now have
20 no recollection of this."
21 **A.** Correct.
22 **Q.** Then the second correction, please, much simpler,
23 page 52 of the witness statement, paragraph 167. In the
24 first line, you say:
25 "It appears that I was asked to provide Litigation

4

1 Support in respect of this prosecution in August 2006."
 2 Do you wish to amend that to "May 2006"?
 3 A. I do, yeah.
 4 Q. Is that because you have now seen a document which has
 5 got your name on it, which is dated from May 2006?
 6 A. Yes.
 7 Q. Thank you. Can you go to the last page, please, which
 8 is page 69 of the witness statement; is that your
 9 signature?
 10 A. It is, yes.
 11 Q. With those two corrections brought into account, are the
 12 contents of the witness statement true to the best of
 13 your knowledge and belief?
 14 A. It is, yes.
 15 Q. Thank you very much. That can come down, thank you, and
 16 you can put the witness statement to one side.
 17 I'm not going to address your background, your work
 18 at Fujitsu or the organisation of the Customer Service
 19 Post Office Account, the CSPOA, and, in particular, the
 20 Security Team within it, as you addressed those issues
 21 on the last occasion and you provide considerable detail
 22 about them in your most recent witness statement. You
 23 say in that recent witness statement that, as of 24 May
 24 2024, you remained employed by Fujitsu as an IT Security
 25 Analyst in the Security Team; does that remain the case?

5

1 A. Yes.
 2 Q. This is a document you refer to in your witness
 3 statement and, if we just pan out a little bit to look
 4 at the whole of the front page, I don't think we see
 5 your name on it; is that right?
 6 A. Yes.
 7 Q. Then if we look at the second page, I don't think we see
 8 your name as a reviewer, either mandatory or optional,
 9 or a person to whom it was issued for information; can
 10 you see that?
 11 A. Yes.
 12 Q. Would that reflect the fact that the level at which you
 13 operated meant that you didn't contribute towards
 14 documents of this kind?
 15 A. Correct, yes.
 16 Q. If we go back to page 1, please and if we scroll down
 17 a little bit, thank you. You'll be familiar with
 18 a number of the names of the contributors there; would
 19 that be right?
 20 A. Yes.
 21 Q. Of the contributors, can you tell us, as at 2005, what
 22 they did and what their relationship to the work that
 23 you did was?
 24 A. Neneh Lowther was part of the same level as I was,
 25 within the Security Team, and she carried out or looked

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1 A. Yes.
 2 Q. Can I begin with what might be described as some process
 3 issues. You refer in your witness statement to the Post
 4 Office Account's Prosecution Support Section, the PSS.
 5 Yes?
 6 A. Yes.
 7 Q. Can you confirm that that entity, the Prosecution
 8 Support Section, was not part of the Post Office; it was
 9 part of Fujitsu?
 10 A. Where -- I'm sorry. I believe so, yes.
 11 Q. Okay. Was there anyone embedded from the Post Office in
 12 it?
 13 A. No, there wasn't.
 14 Q. Can we look at a policy document, please, FUJ00152209.
 15 It'll come up on the screen for you. Can you see this
 16 is a document, the title of which is "Network Banking
 17 Management of Prosecution Support"?
 18 A. Yes.
 19 Q. The date of it in the top right, Version 2, is dated
 20 29 February 2005. A summary of it, under the title,
 21 "Abstract", is given:
 22 "[It] outlines the end-to-end procedures required to
 23 manage and deliver the Network Banking Prosecution
 24 Support Service."
 25 Can you see that?

6

1 after, I believe at the time, ARQ requests along with
 2 other jobs within our team. Bill Mitchell was the
 3 Security Manager, which would have been our line
 4 manager. Penny Thomas would have been the same level as
 5 myself and Neneh, I'm not sure what her role then --
 6 whether she had become the litigation manager.
 7 Jan Holmes and Alan Holmes -- this is where I get
 8 confused because they've both got the same surname --
 9 I think one --
 10 Q. If we just go to page 2 to help you -- and scroll
 11 down -- we can see Jan Holmes is described as the
 12 Quality Assurance Manager and Alan Holmes is described
 13 as Audit. Does that help?
 14 A. Yes, one was like a -- I believe the role was around
 15 a Service Delivery Manager, that would have been Jan,
 16 and Alan Holmes was audit support.
 17 Q. Thank you very much.
 18 This document, which sets out the procedures
 19 required to manage and deliver the Prosecution Support
 20 Service, is this a document you would have been familiar
 21 with back in the day, back in 2005?
 22 A. Um, familiar with? I don't know. I would have probably
 23 read it at one stage but I can't remember --
 24 Q. How were documents distributed to users of them at that
 25 time?

8

1 A. I can't remember how they were distributed back then.
 2 Q. Was there a centralised library, sort of an intranet,
 3 that was a depository/repository of policies that you
 4 were able to access or expected to access or were
 5 documents physically passed to you?
 6 A. Oh, no, yeah, I don't believe they were physically
 7 passed to us but they would have been available if
 8 needed.
 9 Q. Okay, so this is the kind of document that would have
 10 set out the procedures to be operated for --
 11 A. Mm-hm.
 12 Q. -- the Prosecution Support Service in 2005. Just again,
 13 looking at the reviewers and, if we go back to page 1,
 14 the contributors, would you agree that this is
 15 an internal Fujitsu document to which Post Office did
 16 not apparently contribute?
 17 A. It appears so, yes.
 18 Q. All of the contributors and reviewers are Fujitsu
 19 employees rather than Post Office employees --
 20 A. Yes.
 21 Q. -- is that right?
 22 A. Yes.
 23 Q. Do you know the extent to which Post Office was given
 24 the opportunity to comment on, or amend or provide
 25 contributions to policies of this kind?

9

1 shall be recorded and included in the relevant witness
 2 statement of fact.
 3 "Requirements for witness statements explaining the
 4 extraction of audit data from Horizon in response to an
 5 [ARQ] shall be completed by the individual from PSS who
 6 completed the request."
 7 That's the same point as is made in 7.2.4. It
 8 continues:
 9 "The statement shall follow the standard format and
 10 layout for witness statements of fact provided in
 11 evidence. Contents of witness statements of fact are
 12 flexible depending on specific requirements of each case
 13 and the knowledge of the witness giving the statement.
 14 An example of a witness statement of fact is provided in
 15 Appendix 2. For each request, Post Office and
 16 [Prosecution Support] will agree relevant matters (such
 17 as those listed below) which will be covered in the
 18 witness statement of fact (based on the knowledge of the
 19 witness)."
 20 If we read on, we can see that those matters
 21 include -- if you just read the first five there and, if
 22 we go over the page, please, to the fourth bullet point
 23 on that page. Matters which should be covered in the
 24 witness statement of fact include, bullet point 4:
 25 "The process for extracting information for [ARQs]

11

1 A. No, I've no idea what level or whether they -- what
 2 documents they were aware of or saw, no.
 3 Q. Okay. That was something that happened, if it happened,
 4 above your level; is that right?
 5 A. Correct, yes.
 6 Q. Thank you. Can we go to page 22 of the document,
 7 please. Can you see, if we just scroll down, please,
 8 under 7.2.4, it provides "Complete witness statement of
 9 fact":
 10 "[The Prosecution Support Service] PSS will provide
 11 a witness statement of fact in respect of 250 [ARQs] per
 12 annum. This will as far as possible be undertaken by
 13 the person responsible for the actioning of the work ...
 14 so as to retain continuity of evidence and obviate the
 15 need for additional statements."
 16 Just on the point -- the provision of the witness
 17 statement will be undertaken by the person, as far as is
 18 possible, who is responsible for undertaking the ARQ
 19 work described earlier in 7.1 -- that, I think, accords
 20 with what you tell us in the witness statement: if you
 21 did the extraction, then you were the provider of the
 22 witness statement; is that right?
 23 A. Yes, yes.
 24 Q. Thank you. It continues, 7.2.4.1:
 25 "Any material or otherwise pertinent information

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1 and the controls in place to ensure the integrity of
 2 that data."
 3 Then the fifth bullet point:
 4 "An analysis of the [ARQ], when the [ARQ] form was
 5 received and the dates when the audit data extraction
 6 took place. This shall be taken from the Prosecution
 7 Support Database and audit trail file."
 8 Then, lastly:
 9 "A summary of the evidence provided for the
 10 request."
 11 So was it right that the Post Office's only role was
 12 in relation to ARQs, identifying the relevant matters,
 13 ie which of these bullet points needed to be addressed
 14 in a witness statement?
 15 A. Sorry?
 16 Q. If we just go back, please, and scroll up, please. You
 17 see the third paragraph there. Four lines in it reads:
 18 "For each request, Post Office and [the Prosecution
 19 Support Service] will agree relevant matters (such as
 20 those listed below) which should be covered in the
 21 witness statement of fact ..."
 22 So was it the Post Office's role to agree, with
 23 Prosecution Support, which of the bullet points that are
 24 listed needed to be addressed in a witness statement?
 25 A. I don't know, at that level. I'm not quite sure.

12

1 Q. We know that you made many, many witness statements --
 2 A. Mm-hm.
 3 Q. -- what did you take as your guide, if any, as to what
 4 to include?
 5 A. In the data that we supplied or in the witness
 6 statement?
 7 Q. No, in the witness statement.
 8 A. From our witness template that would have been given to
 9 use.
 10 Q. Okay, the witness template, we're going to come on to
 11 look at it in a number, has a number of paragraphs in it
 12 that have a capital letter, A through Q, I think, some
 13 of which are optional?
 14 A. Okay.
 15 Q. It's your evidence, not mine, that is important.
 16 I don't give any evidence at all. The witness
 17 statement, the template, appears to include a number of
 18 paragraphs that are optional. Does that reflect your
 19 understanding?
 20 A. Um ... optional? No, I don't recall that.
 21 Q. We in the Inquiry have seen a number of emails from
 22 either within Fujitsu or from Post Office to Fujitsu,
 23 where they say "include paragraphs D, F and Q. No need
 24 to address K and L".
 25 A. No, I'm not aware of that taking place, no.

13

1 your name to and signed --
 2 A. Yes.
 3 Q. -- you decided what went into those, did you?
 4 A. No, we used the -- a template that we were told to use,
 5 within the team.
 6 Q. Right?
 7 A. The Litigation Support said this is the template to use,
 8 fill in the appropriate information to accompany the ARQ
 9 data and that's what we did.
 10 Q. Where was the template kept?
 11 A. Um ... I believe in a shared fold.
 12 Q. Was that a Prosecution Service Support shared folder
 13 within your Security Team?
 14 A. Yeah, I believe so, yes.
 15 Q. So I don't suppose now you can help us as to whether it
 16 looked like this document or not?
 17 A. No, I'm afraid not, sir.
 18 Q. Okay, if we go back, please, to page 22, and scroll
 19 down. The highlighted part at the bottom:
 20 "For each request, Post Office and [Prosecution
 21 Support] will agree relevant matters (such as those
 22 listed below) which should be covered in the witness
 23 statement of fact ..."
 24 I think, Mr Dunks, but maybe you can confirm if this
 25 is correct, that did not accord with what happened in

15

1 Q. If we go forwards to page 29 and scroll down, I'm
 2 actually going to look at this in an earlier iteration
 3 of the policy in a moment but, if we scroll down,
 4 please, this is the template, you remember that the body
 5 of the policy said that there's an example witness
 6 statement in Appendix 2 and this is Appendix 2. Can you
 7 see that each paragraph is starting above the body of
 8 the paragraph with a capital letter --
 9 A. Yes.
 10 Q. -- can you see that?
 11 A. Yes.
 12 Q. If we go over the page, can we see some more, yes?
 13 A. Yes.
 14 Q. If we scroll on, and keep scrolling, you'll see that
 15 there's some more paragraphs, each with a capital letter
 16 above them. What did you understand the capital letters
 17 were for?
 18 A. It's difficult. I don't -- I don't remember whether
 19 I read this document or if I ever used it to reference.
 20 So I wasn't aware how the witness statements were
 21 generated, who drafted them and how they were drafted.
 22 Q. But you drafted them, didn't you, the witness
 23 statements?
 24 A. Not the template, no.
 25 Q. Okay, the witness statements that you eventually put

14

1 practice? You included what was in the template, rather
 2 than what the Post Office and Fujitsu would agree should
 3 be covered in the witness statement.
 4 A. Yes, yeah.
 5 Q. Would you always use the whole of the template or would
 6 you ever say, "That paragraph isn't relevant to the
 7 thing that I'm speaking about on this case, I'll cut
 8 that paragraph out"?
 9 A. I don't believe that happened no. I'm basing -- would
 10 use a template that had been agreed within the team or
 11 Litigation Support advised us to use.
 12 Q. So you don't remember a stage of the process where Post
 13 Office and Fujitsu came to an agreement on what needed
 14 to be covered off in a witness statement; you just
 15 pulled the template from the shared drive, populated it
 16 with the data that applied to the ARQs that you were
 17 talking about and then signed it; is that right?
 18 A. Basically, yes.
 19 Q. Okay. Can we move forwards, please, to page 25 and look
 20 at paragraph 8.2. "Expert Witness Statement" is the
 21 heading. In the second paragraph there, the policy
 22 says:
 23 "It is ... conceivable that, given the size and
 24 complexity of the Horizon system, the integrity of the
 25 witness statements of fact may be challenged by defence

16

1 counsel in order to discredit a prosecution. In these
2 cases additional, granular detail about the technical
3 working and integrity of various systems that constitute
4 the Horizon system may be required if only for 'unused
5 material'.

6 "Expert witnesses could comprise anyone within the
7 Post Office Account or its approved contractors who
8 could be called upon to provide and testify to this
9 additional evidence.

10 "Expert witnesses could be called upon to provide,
11 for example ..."

12 Then the first one is "Operational logs" and the
13 last one is "Subsequent analysis of this data".

14 Were you aware of, never mind the detail of what
15 this says, but the sense of what these paragraphs say,
16 that, as well as what are described as witness
17 statements of fact, there was the facility for expert
18 witness statements to be provided.

19 A. No, no, I don't think I was ever made aware of anything
20 like that, no.

21 Q. Was that language in use at the time in Fujitsu in the
22 Support Service, "Mr X or Ms Y" -- probably by their
23 first name -- "is providing a witness statement of fact"
24 or, "In this case, because there's been a challenge, we
25 need an expert witness statement"?

17

1 descriptions. The local work instructions were informal
2 documents, which at some stage had been written by those
3 actually performing the tasks, and which focused on the
4 practicalities of how to do each task. I believe Penny
5 Thomas drafted local work instructions in respect of ARQ
6 extractions, and I wrote the local work instruction in
7 respect of how to extract the HSD call records, though
8 both documents may have been updated by different people
9 over the years. None of these local work instructions,
10 that I used-on a day-to-day basis, have been disclosed
11 to me by the Inquiry."

12 I should say that's because we haven't got them.

13 So you tell us here that there were things that you
14 call local work instructions and that they were used,
15 rather than Fujitsu policies and service descriptions;
16 is that right?

17 A. Yes, correct.

18 Q. In the drafting of them, were they based on the Fujitsu
19 policy or service descriptions?

20 A. I don't know. That I don't know.

21 Q. Did you create these documents, you within the Security
22 Team, of your own initiative?

23 A. On the HSD calls, because that's the ones I would have
24 done, I can't remember whether it was off my own
25 initiative or I was asked by the manager to create that

19

1 A. No, not that I'm aware of. I don't recall anything like
2 that taking place within the team at any time, no.

3 Q. You'll see that it says, "Expert witnesses could
4 comprise anyone within the Post Office Account"; can you
5 see that?

6 A. Yes.

7 Q. Were you ever told that you were a person that could
8 provide evidence that would be classed as expert
9 witness?

10 A. No. No one did, as far as I'm aware, describe me as
11 an expert witness.

12 Q. That can come down, thank you. Can we go to your
13 witness statement, please, your second witness
14 statement, it'll come up on the screen at page 17,
15 paragraph 53. You say:

16 "I and the other ... Security Analysts assisted the
17 Litigation Support Manager as and when required, in
18 addition to performing the other tasks assigned to us by
19 the Operational Security Manager. We were very process
20 driven and followed local work instruction documents
21 ..."

22 That's what I'm going to be concentrating on in
23 a moment, Mr Dunks:

24 "... for many of the tasks that we performed, rather
25 than consulting the Fujitsu policies and service

18

1 work instruction, so other people within the team could
2 perform the same task.

3 Q. So if there had been a tasking, it would have been by
4 your manager; is that right?

5 A. Yes, yes.

6 Q. Did any managers approve the local work instructions?

7 A. I don't remember that happening, no.

8 Q. Can you help us as to why a manager may not have
9 approved the local work instructions?

10 A. No, I don't know why.

11 Q. You see, we've got a suite of documents, and there are
12 a lot of them, which are Fujitsu policies, which say how
13 your work is to be undertaken, yes? I've just shown you
14 one of them.

15 A. Yes.

16 Q. You tell us here that, instead of using those, you were
17 relying on some local work instructions?

18 A. Yes.

19 Q. I'm trying to find out who signed those off, rather than
20 the formal policy documents that all sorts of people had
21 reviewed, contributed to and quality assured?

22 A. Well, I can only say my experience of the -- I created
23 many, many work instructions to do with my main role,
24 which is the key management because, again, there were
25 vast documents explaining things and how things worked

20

1 within the key management arena. And for -- instead of
 2 keep referring to that, we'd take the instructions and
 3 create the local work instructions for somebody who
 4 could come along and perform that task, in an easier,
 5 step by step, and that's what we classed as local work
 6 instructions.
 7 Q. To what extent were they based on the requirements of
 8 Fujitsu policies like the one I've just shown you?
 9 A. I've no idea, actually. They would have taken
 10 information from that.
 11 Q. Was any consideration given to, "We're drafting up
 12 a local work instruction on how to extract and put into
 13 a witness statement information about Helpdesk calls",
 14 any consideration given to "What does our policy, our
 15 company policy, say about that"?
 16 A. I can't say for the ARQ local work instructions but, no,
 17 I don't believe, from my point of view, from the HSD
 18 call extraction, no.
 19 Q. On your document, the one that you tell us here that you
 20 drafted, can you help us: did it say anything about
 21 whether the Helpdesk calls that you were obtaining
 22 should be summarised in the witness statement to which
 23 the case related?
 24 A. No, no. It was purely the actions of requesting and
 25 downloading the Helpdesk calls.

21

1 A. No, it didn't, no.
 2 Q. Was there any document that regulated or regularised
 3 what went into a witness statement, and let's stick with
 4 HSD calls.
 5 A. I don't believe so, no.
 6 Q. You understand that you could do it in different ways,
 7 couldn't you? You could say, "I am Andrew Dunks. On
 8 Monday, 1 January, I extracted 120 calls in relation to
 9 this branch between these two date parameters from the
 10 HSD. I exhibit them as my exhibit AD1". That's one way
 11 of doing it, isn't it?
 12 A. Sorry, are you saying would that have been part of the
 13 instructions?
 14 Q. No, that could be a way of doing it?
 15 A. Yes.
 16 Q. Another way could be making a witness statement which
 17 said, "I'm Andrew Dunks and I accessed and read the
 18 calls and I've cut and paste a summary of them into my
 19 witness statement"? That would be another way of doing
 20 it, wouldn't it?
 21 A. Yes, it would have been.
 22 Q. Another way of doing it would be to add on the end of
 23 either of those two some analysis of what those calls
 24 meant?
 25 A. Yes.

23

1 Q. So it was quite practical about how to go about, is this
 2 right, the extraction of the Helpdesk calls?
 3 A. Correct.
 4 Q. It didn't say what you then did with that data?
 5 A. No.
 6 Q. So it didn't say you must exhibit it to a witness
 7 statement, the download?
 8 A. Yeah. No, it didn't.
 9 Q. It didn't say you must summarise it in your witness
 10 statement?
 11 A. No, it didn't.
 12 Q. It didn't say you should or you should not seek to
 13 analyse what the data means?
 14 A. No, it didn't.
 15 Q. Is this right: it didn't say if you're unsure about what
 16 an entry on the HSD log means, it's permissible or not
 17 permissible to go and speak to the SSC about that to get
 18 an explanation --
 19 A. No, it didn't, no.
 20 Q. -- and that if you get an explanation you should record
 21 that fact in the witness statement?
 22 A. No, it didn't.
 23 Q. So it didn't speak about any of, from our perspective,
 24 the important things of what because into the witness
 25 statement?

22

1 Q. By "analysis", I mean offer an opinion on what they
 2 mean --
 3 A. Yes.
 4 Q. -- what the entries mean, and offer an opinion over
 5 whether the content of any of the calls related to the
 6 integrity of the data being processed by Horizon?
 7 A. Yes.
 8 Q. Was there any instruction at all, that you were aware
 9 of, that told you which of those things you should do,
 10 or which of those things you shouldn't do?
 11 A. Written instruction? No.
 12 Q. To start with, yes, written instruction?
 13 A. Yes. No.
 14 Q. Because, in a moment, we're going to see that, over
 15 time, you did all three of those things, in different
 16 cases. Was there any oral instruction that told you
 17 when you're summarising -- sorry, when you're dealing
 18 with HSD data, this is the way to do it in a witness
 19 statement?
 20 A. I don't recall instructions.
 21 Q. How about advice or guidance?
 22 A. No, not advice and guidance, no.
 23 Q. Thank you. Okay, that can come down.
 24 Can I turn to the issue of the extent to which you
 25 extracted ARQ data and the extent to which you gave

24

1 evidence, ie the scale of the enterprise that you were
2 engaged in. You tell us in your witness statement, and
3 I'm summarising here, that, firstly, you held limited
4 technical knowledge of the operation of Horizon; is that
5 correct?

6 **A.** Yes.

7 **Q.** Secondly, that you had limited knowledge of bugs, errors
8 and defects in the Horizon system; is that correct?

9 **A.** Yes.

10 **Q.** Thirdly, that you had no role, and you did not and never
11 had worked, in HSD, the Helpdesk?

12 **A.** Correct.

13 **Q.** Is that correct?

14 Can we look at paragraph 20 of your first witness
15 statement, please, which is WITN00300100, and can we
16 look, please, on page 6 at paragraph 20. Can you see
17 that on the screen?

18 **A.** I can.

19 **Q.** You say "On occasion", and it's going to be those words
20 that I'm going to be focusing on in a moment, Mr Dunks:

21 "On occasion, I was requested to provide the Post
22 Office with records of calls made to the HSD by
23 a particular Post Office branch and (if requested) to
24 summarise these in witness statements. While
25 I therefore did have access to the historic HSD call

25

1 knowledge to be able to do that, yes.

2 **Q.** Enough knowledge to what, say that what was recorded on
3 the calls meant that either the Horizon system was or
4 was not operating as it should?

5 **A.** I had enough knowledge to understand -- well, during my
6 looking at the calls and investigating the calls,
7 I believe I gained enough knowledge to satisfy myself to
8 make that sort of statement, yes.

9 **Q.** When you made that kind of statement, whether the
10 Horizon system was operating as it should or not, by
11 reference to the Helpdesk calls, you were offering an
12 opinion, weren't you?

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

14 **Q.** You weren't making a statement of fact?

15 **A.** Yes.

16 **Q.** Can we go, please, to POL00003219. This is
17 a spreadsheet. Thank you.

18 This is a spreadsheet disclosed to the Inquiry by
19 the Post Office. It appears to be a record prepared by
20 Fujitsu of the dates that requests for work were
21 received, whether a statement was required in relation
22 to each case and, if so, who prepared it, and whether
23 the statement had been posted out or not. The document,
24 runs from 5 April 2004 to 22 March 2005, so just under
25 a year.

27

1 records, I would only be looking at them when requested
2 to do so as part of this task. I was not party to the
3 calls themselves and had no role in investigating any
4 errors ... or communicating with the system users about
5 them."

6 Can you confirm that that accurately records the
7 extent of your role in the provision of witness
8 statements concerning calls to the Helpdesk?

9 **A.** Yes.

10 **Q.** Would you agree that what you're describing there is
11 a purely procedural, administrative or mechanical one,
12 ie extracting the data but also then summarising them in
13 the witness statements?

14 **A.** Yes.

15 **Q.** Would you describe the function that you were performing
16 as a limited function?

17 **A.** Limited, yes.

18 **Q.** Would it be right that you didn't have the technical
19 expertise to interrogate whether the Horizon system was
20 operating as it should at the relevant time?

21 **A.** Sorry, say that again.

22 **Q.** Yes. Would it be right that you didn't have the
23 technical expertise to interrogate whether the Horizon
24 system was operating as it should at the relevant time?

25 **A.** In respect of the Helpdesk calls, I believe I had enough
26

1 If we look at the column F, can you see that?

2 **A.** Yes.

3 **Q.** If we just go to the dropdown. Thank you. You'll see
4 that in, a number of rows, for example 10 and 11 and 24
5 onwards, something has been redacted -- can you see
6 that --

7 **A.** Yes.

8 **Q.** -- I think before we got the document. We understand
9 that to indicate whether or not a witness statement was
10 required and, therefore, I can't say one way or the
11 other what was populated in column F. But if we go
12 further to the right to column N, and then if we scroll
13 down, you see, for example, there Penny Thomas' name
14 under a "checked by" box appears, and if we just look at
15 the dropdown -- just look at the dropdown once more,
16 thank you -- you'll see that you're one of the people
17 who can be ticked; can you see that?

18 **A.** Yes.

19 **Q.** Was that essentially the team there?

20 **A.** Yes, it was.

21 **Q.** Your name, we counted them up, appears in 98 different
22 lines in this column between 17 August 2004 and 9 March
23 2005. So in a six or seven-month period, you have had
24 input on 98 requests from the Post Office?

25 **A.** Yes.

28

1 Q. The "checked by", was there a process of checking
2 something?

3 A. These checks were, if I remember correctly, for the ARQ
4 data and once someone had extracted the data, they'd
5 performed their checks at the dates, and the data looked
6 okay, and before it was sent to Post Office, a member of
7 the team, whoever was available -- so there was no
8 formal -- would run -- get asked to run their eyes over
9 it to double check before it was sent to the Post
10 Office, and that's who would have been put in there.

11 Q. So would the "checked by" be the same person who had
12 done the extraction?

13 A. No.

14 Q. It would be a different person?

15 A. Yes.

16 Q. Okay. So over this six or seven-month period you have
17 checked 89 requests from Post Office. Would that sound
18 about right to you, about 100 over a six or seven-month
19 period?

20 A. I don't know. It varied. It could have been more it
21 could have been less over the years. I can't say that
22 that. That sounds about right but ...

23 Q. What proportion of ARQ requests resulted in the requests
24 for the production of a witness statement?

25 A. I've no idea.

29

1 only on occasion that you were asked to provide call
2 records?

3 A. Yes, it wasn't -- yeah.

4 Q. Again, how many times a year?

5 A. Again, I don't know. It would have varied from year to
6 year but it wasn't large -- from what I remember, it
7 wasn't that many.

8 Q. So once a month?

9 A. I can't say. I don't know. No. It could have been one
10 a month, it could have been none for the period of
11 a couple of months, it could have been a couple --
12 I don't know, I'd be guessing.

13 Q. Okay, we can take that down, then. Can we go to your
14 second witness statement and turn to the issue of the
15 approach that you took to the provision of witness
16 statements provided by Fujitsu to support Post Office
17 prosecutions. I want to start with the question of
18 whether you were happy to provide such witness
19 statements, whether you were content to do so. Can we
20 look at your second witness statement, please, at
21 page 16, and read paragraph 48, please.

22 You say:

23 "I recall that Ms Bains was the main person
24 responsible for performing ARQ data extractions for
25 a time."

31

1 Q. Can you help us whether it was always or --

2 A. Oh, no, no, no --

3 Q. -- infrequently --

4 A. -- as far as -- sorry. Sorry to interrupt.

5 Q. It's all right.

6 A. As far as I'm aware it was quite infrequent.

7 Q. If we just go to the top of the page and look at column
8 O, again on "Witness Statement Required", look at the
9 dropdown. We can see that's been redacted in each
10 column.

11 A. Yes.

12 Q. I don't think we can tell the proportion of cases in
13 which a witness statement was required. How regularly
14 were you providing witness statements?

15 A. Again, quite -- I don't know, again -- for -- this is to
16 do with ARQs. Quite infrequently.

17 Q. So, over a year, how many would you provide?

18 A. From memory, I have no idea. It could be half a dozen.
19 It could -- I don't -- I honestly can't remember --

20 Q. Would you always do it the same way: by pulling up the
21 template from the shared drive?

22 A. Yes.

23 Q. You remember in your witness statement you said, "On
24 occasion I was requested to provide the Post Office with
25 records of calls made to HSD". Is that right, it was

30

1 Can you help us with who Ms Bains was.

2 A. That was Raj Bains.

3 Q. That's Rajbinder Bains, is that right, to give her her
4 full name?

5 A. Yes.

6 Q. You tell us she was the main person responsible for
7 performing the ARQ extractions for a time?

8 A. Yes.

9 Q. But then did that change?

10 A. Yes, it did, I mean there were a number of people who
11 took that main responsibility.

12 Q. You continue:

13 "However, she did not want to be a witness in any
14 court proceedings so I do not believe she prepared any
15 witness statements. I got the impression she was
16 nervous because it was something unknown to her, and the
17 idea of going to court and being questioned was a bit
18 daunting."

19 Just stopping there, were they the only reasons that
20 Ms Bains did not wish to provide witness statements?

21 A. I don't know. I'm not sure I ever had a proper
22 conversation about it but I do remember her being
23 nervous. She's not that type of outward person to want
24 to do that.

25 Q. You continue:

32

1 "Where [Post Office] requested a witness statement
2 at the time of the ARQ request, I or someone else would
3 therefore perform the data extraction and supply the
4 statement. If Ms Bains had performed the data
5 extraction and [the Post Office] later requested
6 a witness statement, then I or someone else would
7 re-extract the data."

8 So you, is this right, were not apparently afflicted
9 with the same concerns that Ms Bains was about making
10 witness statements and giving evidence and appearing in
11 court.

12 A. Sorry, afflicted?

13 Q. Yes, she didn't want to be a witness. She was,
14 according to you, nervous and didn't like the idea of
15 going to court. You didn't suffer from any of those
16 afflictions?

17 A. I wouldn't say I didn't but I think I was probably a bit
18 more confident than Raj was at the time.

19 Q. Okay, you were happy to go to court, firstly happy to
20 provide witness statements and then content to go to
21 court; is that right?

22 A. Yes, yes.

23 Q. Were you provided with any training by Fujitsu, or
24 otherwise, about the tasks that you were performing in
25 extracting ARQ data, obtaining HSD call records and then

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1 A. I --

2 Q. What did you do accordingly?

3 A. I would have done that task to the best of my ability
4 and as thoroughly as I could.

5 Q. What about the provision of evidence part of it, rather
6 than being professional over the extraction of the ARQ
7 data or the HSD call records? Was there anything in
8 particular that you did when you were providing the
9 evidence part of the function?

10 A. What do you mean by providing the evidence part? I'm
11 sorry?

12 Q. Well, you were writing witness statements --

13 A. Yes.

14 Q. -- and then you were going to court to give evidence.

15 A. Yes.

16 Q. You said that you took your role seriously. Was there
17 anything that you did, because you took your role
18 seriously, in the provision of the witness statements or
19 the going to court to give evidence bits?

20 A. I can't think that I did anything differently, no.

21 I just performed the task that I did to the best of my
22 ability, yeah.

23 Q. Okay, can we look at some documents, please, and start
24 by looking at FUJ00225644, and look at page 2, please.

25 If we scroll down, we've got the bottom part of the

35

1 writing witness statements and then appearing in court?

2 A. We would have had training on the extraction process for
3 ARQs, and HSD calls, I'm not sure I had training on that
4 because that's my responsibility and I sort of managed
5 that process.

6 Q. So, if there was training, you'd be the trainer not the
7 trainee?

8 A. Quite possibly, yes.

9 Q. What about the other bits, the writing of witness
10 statements and appearing in court; any training from
11 Fujitsu or otherwise on those?

12 A. No, none at all.

13 Q. What thought, if any, did you give to the role that you
14 were performing and the fact that the evidence that you
15 gave may have had a significant impact on people's
16 lives?

17 A. I don't recall my thought process at the time of
18 generating those but I took that responsibility quite
19 seriously. I mean, I was supplying data and had to be
20 happy with that witness statement.

21 Q. You said that you took the role quite seriously.

22 A. Mm-hm.

23 Q. What did you do in carrying into effect that state of
24 mind: if you take something seriously, you sometimes do
25 things accordingly?

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1 email. Can you see an email here from Lisa Allen to
2 Phil Budd of 29 July 2009, concerning the Porters Avenue
3 Post Office and the provision of a statement, yes?

4 A. Yes.

5 Q. Now, the Porters Avenue Post Office, I think you know
6 that was run by the subpostmaster Mr Jerry Hosi, yes?

7 A. Yes.

8 Q. Before we get into the detail, because it's not a case
9 we've looked at in any substance before, I think it
10 would be helpful to remind ourselves as to what happened
11 in Mr Hosi's case, so can we temporarily go away from
12 this email and look at RLIT0000130. I think you'll
13 recognise this as a judgment from the Court of Appeal
14 and, if we just scroll down, it's dated 7 October 2021
15 and it's in the case of Ambrose & Others, and one of the
16 others was Mr Hosi.

17 If we can look, please, at page 7, and scroll down
18 to paragraph 33. I'm just going to read, to get us all
19 in mind of what happened in Mr Hosi's case, because it's
20 not a case we've looked at much. The Court of Appeal
21 records that:

22 "On 12 November 2010, in the Crown Court at
23 [Southwark], [Mr] Hosi was convicted of one count theft
24 and three counts of false accounting. On the same day,
25 he was sentenced to a total of 21 months' imprisonment.

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On 5 August 2011, a confiscation order was made in the sum of £3,500."

And then 34:

"An audit of Mr Hosi's branch identified a shortfall of [£72,000, or so]. As a result, [he] and his son, Edem Hosi, who worked in the branch with his father, were interviewed under caution by [Post Office] Investigators. Edem Hosi told the Investigators that his father had four or five months earlier (before Edem started work at the branch), told him that there were unexplained shortages. He said his father was very careful about money as he had worked hard to make a success of the business.

"35. In his own interview, Mr Hosi said that he had experienced discrepancies at the branch since he had become the [subpostmaster]. He could not understand how the losses were occurring. He complained about the lack of support from the Horizon Helpline to which he had reported the apparent losses. He said that he had inflated the figures for cash on hand because he did not have sufficient cash to cover the apparent losses. He denied stealing money and blamed the losses on the Horizon system."

Over the page.

"As Mr Hosi had blamed Horizon, the Post Office

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other words, no work has been done to ascertain whether the cash imbalance was because of the amount physically to hand was too low (ie as the Post Office allege) or because the amount shown on the IT system was too high'.

"The defence also instructed an IT expert. Although there was correspondence complaining about disclosure, it appears that the defence were able to view the material they wanted, though we note that the defence complained about the amount of time they were afforded to do so. Gareth Jenkins was instructed by [Post Office] to respond to the expert evidence but no formal report or witness statement appears to have been prepared by him. He was not called as a witness at trial. In the event, [Post Office] relied at trial on evidence from Phil Budd and others.

"[Post Office] accepts that this was an unexplained shortfall case and that evidence from Horizon was essential to the prosecution case. [Post Office] accepts ... that the prosecution of Mr Hosi was both unfair and an affront to justice."

Conviction was quashed on all four counts.

So that's a reminder of what Mr Hosi's case was about. Can we go back to the email, please, FUJ00225644. Page 2, bottom email, Lisa Allen to Phil Budd. Lisa Allen, is this right, she was

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Investigators arranged for Fujitsu ... to undertake hard drive analysis ... [The court] have been provided with an extract of the report of the analysis (by Phil Budd of Fujitsu) from which we infer that the results were inconclusive. The extract does not strike us as supporting a prosecution. ARQ data was obtained for the period 10 August 2006 to 29 November 2006 and disclosed to the defence.

"Emails going back to May 2005 (five months before the indictment period) indicate that Mr Hosi had told Post Office about 'major problems balancing' such that he needed 'urgent face-to-face help'. [Post Office] accepts that it is not clear whether this material was disclosed. Logs from [the Post Office's NBSC] show that Mr Hosi made numerous calls categorised 'Horizon balancing'.

"The defence obtained expert evidence to challenge the Horizon evidence. An accountant's report ... stated:

"In the interviews it is clear that the Post Office proceeded with a pre-determined view that Mr Hosi had stolen the allegedly missing money. Other possibilities have been ignored ...

"In particular, it has not been explored whether there was any missing money in the first place. In

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an Investigation Manager in the Post Office?

A. I don't know what her role was, no. Sorry, I can't remember what her role was.

Q. Okay, she gave evidence to this Inquiry back on 20 December 2023 and told us she was, at this time, an Investigation Manager in the Post Office. Phil Budd, he was a colleague of yours, is that right, at Fujitsu?

A. Yes. Say colleague. He worked on the account but I didn't have day-to-day dealings with him.

Q. If we scroll up, I think we can see his signature block, that he was an RMGA Development, Systems Engineer. Was that somebody who didn't work in the same team as you, then?

A. Yes.

Q. Okay. Anyway, Ms Allen says, let's read her email:

"Phil,

"Sorry for not getting back to you -- we had another hearing and the trial has been adjourned for further enquiries as the defence want an expert to analyse the equipment and they need to get funding.

"Thanks for the statement I will forward it to our Legal Team."

So it seems Ms Allen was saying there had been another hearing, an adjournment of the trial, for the defence expert report and a thanks for the witness

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1 statement.

2 If we go back to page 1, please, foot of the page.

3 You'll see, at the foot of the page, that exchange is
4 forwarded to you.

5 "Morning Andy,

6 "That court case reared its head against a few weeks
7 ago. You remember I analysed a couple of counters back
8 in July '07 then you got me to sign a new witness
9 statement in June '08, well, they came back again and
10 wanted me to sign another one -- just a single paragraph
11 to say that the counters were in 'full working order and
12 would not cause a discrepancy'. I was not happy with
13 the implications of 'full working order' since I did not
14 perform test transactions on the counters so I provided
15 a new paragraph to reiterate my previous statement --
16 that the files thereon were correct and the counters
17 should be expected to perform as required.

18 "The reason for my email, now the defence are hiring
19 an expert to analyse the equipment I just wanted to make
20 sure [Post Office Account] are not solely relying on my
21 analysis -- I assume we have supplied evidence of the
22 transactions going through and the systems working
23 correctly? I'm just trying to reduce the stress I feel
24 whenever this pops back into my head!"

25 Do you know why Mr Budd was not happy with signing

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1 Do you know what that means? Can you decode what's
2 being said there, please, by Mr Sewell?

3 A. The only thing I can deduce from that is that, after his
4 42 days, the message store is no longer available. The
5 other parts I probably wouldn't have been involved in.

6 Q. Just go back down to what Mr Budd's worry was, if we
7 keep going, thank you. He says he was "not happy with
8 the implications of saying in a witness statement that
9 the counters were in full working order", and he says
10 that he felt stress whenever this popped back into his
11 head and seemingly was stressed again because the
12 defence were now instructing an expert.

13 Would you agree that, overall, this wasn't
14 a complete refusal to provide a witness statement, like
15 Ms Bains, but that Mr Budd was anxious to make sure,
16 firstly, that the witness statement he signed did not go
17 beyond what he actually could say --

18 A. Yes.

19 Q. -- and, secondly, that other people with knowledge of
20 other areas of the system should carry out their
21 investigations properly and not put the burden on him to
22 say something that he could not himself say?

23 A. I'm not -- well, no, I don't believe it says that --
24 he's stating that other people should carry out their
25 work properly but there are other areas that can be

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1 a witness statement which said that the counters were in
2 full working order and would not cause a discrepancy?

3 A. No, I mean, I can't remember this email but I would only
4 have taken my understanding from reading the email.

5 Q. You wouldn't have had a discussion with him about, "Come
6 on, Phil, why don't you just sign the witness statement?"

7 What's all this worry about, saying that the counters
8 are in full working order and wouldn't cause
9 a discrepancy?"

10 A. A conversation on -- well, I don't remember having
11 conversations with him, but I would certainly not have
12 had a conversation along those lines, no.

13 Q. If we just scroll up, please. You forward this to Peter
14 Sewell saying:

15 "I think you need to be made aware of what Phil has
16 been asked for."

17 He was your manager; is that right?

18 A. I think ... yes.

19 Q. He replies at the top:

20 "Phil

21 "Your statement is fine and is all you can actually
22 say. If they stump up the cash the counter equipment
23 can won't be of much use as the 42 days retainer of the
24 message store is long gone, and will be endorsed by
25 Gareth."

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1 looked at, or used --

2 Q. So, if the expert report is going to be commissioned by
3 the defence, other people in the Post Office Account
4 should not rely solely on his analysis, Post Office
5 Account should supply evidence of the transactions going
6 through?

7 A. I don't know. I'm not sure -- I don't know what he was
8 thinking, whether he thought he was the only person.
9 I can't --

10 Q. At the very least, would you agree that this kind of
11 email of Mr Budd being careful, should have alerted you
12 to the need for yourself to be careful about what you
13 could and could not say for yourself in a witness
14 statement?

15 A. No, I don't know. I can't remember what I took from
16 that, I'm sorry.

17 Q. But this is, on the face of it, a systems engineer
18 saying, "I'm only going to be prepared to speak to the
19 matters about which I have personal knowledge"?

20 A. Of the testing that he carried out, yes.

21 Q. And that "I'm not prepared to say that the counters were
22 in full working order and couldn't or would not cause
23 a discrepancy", ie give some master opinion about the
24 counters and their working?

25 A. Well, no, he's saying that he couldn't do that because

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1 he hadn't put, from a testing perspective, he hadn't
 2 carried out those particular tests.
 3 **Q.** In fact, as we're going to see, you gave witness
 4 statements that were, in part, based on conversations
 5 which you had with other people, in the SSC in
 6 particular, weren't they --
 7 **A.** Yes.
 8 **Q.** -- and your witness statements were based on what you
 9 say people in the SSC had told you, weren't they?
 10 **A.** Yes.
 11 **Q.** But what they told you was not attributed to them in
 12 your witness statements, was it?
 13 **A.** No, it wasn't.
 14 **Q.** Instead, it was presented in your witness statement as
 15 if you were speaking from your own knowledge and
 16 expertise, wasn't it?
 17 **A.** Yes, it was.
 18 **Q.** Did you realise, when you were undertaking that task,
 19 going off to speak to or speaking down the phone to
 20 people in the SSC, writing things in your witness
 21 statements that were based on things they were telling
 22 you, about which you had no clue yourself, that you were
 23 blurring lines?
 24 **A.** Sorry, what was the question?
 25 **Q.** When you were doing this, writing witness statements

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1 a copy of an email from Mik Peach dated 7 August 2007
 2 with the subject 'Requests for data and calls' in which
 3 he describes an 'incident' the previous year 'in which
 4 an SSC staff member ended up in court' and says that
 5 'the SSC is NOT in a position to undertake this role'.
 6 In fact, the whole email -- I'm just going to quote
 7 it without reading it -- went on to say:
 8 "It may be that the underlying issue is a lack of
 9 resource of a particular kind of in the Security Team,
 10 someone who has both the technical knowledge to retrieve
 11 and understand the data and who is capable of supplying
 12 the analysis in the correct legal terminology to the
 13 Post Office."
 14 Was Mr Peach right in that respect, that within the
 15 Security Team, there was a lack of resource of a person,
 16 or people, who had the technical knowledge to extract
 17 the data, on the one hand, but were also capable of
 18 supplying analysis of the data in court proceedings?
 19 **A.** No, I don't -- at that time, no, I don't believe that
 20 there was. In my role within supplying those witness
 21 statements and the calls, the call log data, no, I don't
 22 believe I did.
 23 **Q.** In that email, the one that is cited on that page there,
 24 Mr Peach suggested that Gareth Jenkins could fill the
 25 gap. Do you remember, however, that when it came to the

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1 that were, in part, based on what other people had told
 2 you, the facts themselves, you yourself could not speak
 3 to, from your own personal knowledge, did it occur to
 4 you that you were blurring lines?
 5 **A.** No. No.
 6 **Q.** Had anyone told you, or given you guidance, that it was
 7 acceptable to essentially speak on behalf of SSC staff
 8 without revealing that that was what was going on in
 9 your witness statement?
 10 **A.** No, no. No one had explained that I had to -- well, as
 11 I say, it wasn't just SSC. No one explained to me that
 12 I had to state where I gained that knowledge from.
 13 **Q.** Can we go back to your witness statement, please,
 14 page 19. This is second witness statement, page 19,
 15 paragraph 60. You tell us that:
 16 "One person from the SSC who I do recall interacting
 17 with concerning litigation support was Anne Chambers.
 18 I recall sitting a witness waiting room with Anne
 19 Chambers for a couple of days prior to us both giving
 20 evidence (which I thought was the Old Bailey but now
 21 understand would more likely have been the Lee Castleton
 22 proceedings at the High Court). My recollection is that
 23 after that case Ms Chambers did not give evidence in
 24 court again, and that Mik Peach did not want any of his
 25 team to go to court. The Inquiry has provided me with

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1 Seema Misra trial, Mr Jenkins deferred to you over the
 2 reading of the Helpdesk logs?
 3 **A.** What, during the Misra trial?
 4 **Q.** Yes.
 5 **A.** No, I don't remember that, no.
 6 **Q.** You don't remember that, okay. In any event, you've
 7 told us in your witness statement that you passed on
 8 what people told you in the SSC, in terms of analysis of
 9 HSD calls; is that right?
 10 **A.** Sorry, I'm trying to listen to the question. Can you --
 11 **Q.** Yes, in your witness statement generally you tell us
 12 that you went to the SSC and spoke to them, or called
 13 them --
 14 **A.** Yes, I --
 15 **Q.** -- and asked them for assistance --
 16 **A.** At times, yes.
 17 **Q.** -- on what entries in HSD logs meant, and whether or not
 18 what was recorded there would have had an effect on the
 19 operation of the Horizon system?
 20 **A.** Yes.
 21 **Q.** You presented that in witness statements as if that was
 22 from your knowledge and understanding, and your own
 23 analysis. In the light of that, did you think that it
 24 was appropriate, given the SSC's reluctance to undertake
 25 that function themselves --

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1 A. No.
 2 Q. -- ie they don't want to go to court either, and explain
 3 their own entries on records and, instead, what's
 4 happening is you're phoning them up asking what entries
 5 mean, presenting it as if it's your analysis but without
 6 saying so?
 7 A. No, I don't believe I saw it along those lines. I saw
 8 it along the lines -- through any investigation or any
 9 reading of any literature or documents or speaking to
 10 people, once I've spoken to those people, or asked
 11 questions about this, that and the other, I had that
 12 understanding. So it was within my -- at that time, it
 13 was within my own knowledge.
 14 Q. So because somebody tells you something, you're allowed
 15 to repurpose it as your own knowledge in a witness
 16 statement and evidence in court, is that what you're
 17 saying?
 18 A. Repurpose?
 19 Q. Yes. As if it's your own knowledge.
 20 A. Well, no, I then understood it, and then I considered
 21 it, that I knew then, that.
 22 Q. Did it ever occur to you or did you ever think, "Why is
 23 it that I'm speaking to what the SSC are saying, and yet
 24 the SSC don't want to go to court themselves"?
 25 A. No, I didn't see it like that, no.

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1 that many mobile phones are stolen on the streets of
 2 London every day, that doesn't mean I approve of it.
 3 A. Well, I would have taken approval of signing off that
 4 they were aware that I was doing that. So, I mean, if
 5 they didn't think I should be doing it, they would have
 6 said I shouldn't be doing it.
 7 Q. Was there a relationship between Mr Peach being
 8 protective of his team, saying that they aren't to go to
 9 court any more, and you taking a greater role and
 10 effectively giving some of the evidence that they would
 11 have given?
 12 A. I don't think so, no. I don't believe so. I can't
 13 remember that.
 14 MR BEER: Thank you. Sir, we're about to turn to
 15 a different topic. Might we take the break until 11.25,
 16 please?
 17 SIR WYN WILLIAMS: Yes, of course.
 18 MR BEER: Thank you, sir.
 19 (11.13 am)
 20 (A short break)
 21 (11.25 am)
 22 MR BEER: Good morning, sir. Can you see and hear us?
 23 SIR WYN WILLIAMS: Yes, thank you.
 24 MR BEER: Thank you.
 25 Mr Dunks, can I turn to the issue of the extent of

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1 Q. Did you think at all as to why the SSC don't want to go
 2 to court any more?
 3 A. I can't remember my thought process but I do remember
 4 that Mik Peach was quite protective of his team in all
 5 respects of doing things.
 6 Q. Did anyone decide that it was acceptable for you to
 7 essentially provide SSC evidence in court so that they
 8 no longer had to answer for their work, their own work,
 9 in witness statements or in oral evidence?
 10 A. I --
 11 Q. Did a manager sign it off and say, "Look, Mik Peach is
 12 being protective over his team, he's not letting them go
 13 to court. I'm being put up instead. I chat to the SSC
 14 and I say what they would have said if they had gone to
 15 court". Did anyone sign that off?
 16 A. Well, sign off ... um --
 17 Q. But --
 18 A. If you're saying sign off as they were aware that that's
 19 what I was doing and so they accepted that I was able to
 20 do that, well, yes, because -- I mean, I would have had
 21 discussions with that and I think some of the
 22 documentation, that they were aware. That that's what
 23 I would be doing.
 24 Q. When I say "sign it off", I mean give explicit approval
 25 to it, rather than being aware that it goes on. I know

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1 the analysis that went into the HSD logs. Can we look
 2 at how you described this in your second witness
 3 statement at page 18, paragraph 57. Thank you. You
 4 say:
 5 "In respect of the HSD calls, as part of my due
 6 diligence when analysing whether there could have been
 7 an impact on the integrity of the data, I would consult
 8 with colleagues who had come across the issues before or
 9 who had [a] greater technical knowledge than me, such as
 10 the Software Support Centre (SSC), to better understand
 11 the nature of the issues being raised and how they were
 12 resolved."
 13 Can you please explain your approach to what you
 14 describe as "due diligence" in providing evidence about
 15 whether phone calls to the HSD might demonstrate
 16 an issue that went to system integrity?
 17 A. Sorry, what was the last bit of that?
 18 Q. Yes. Can you explain the approach that you took,
 19 ie what prompted you to make a call to the SSC; what
 20 level of concern in what you read on a call log would
 21 cause you to go to the SSC?
 22 A. Um --
 23 Q. You call it due diligence, here.
 24 A. Yeah, due diligence. I would have carried investigation
 25 and look at through each of the calls.

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1 Q. Stop there. You say you would have carried out
 2 an investigation. What did your investigation consist
 3 of?
 4 A. Right, I'd have printed out all the calls in detail, or
 5 printed them out. I'd have read through the calls --
 6 Q. So printing and reading them?
 7 A. Yes, step by step, and looking at the calls. If there
 8 was an area within there that I didn't quite understand
 9 what was going on, or what was -- how it was being
 10 resolved, I would consult whoever I believed at the time
 11 would have been able to help me understand what was
 12 going on.
 13 Q. How did you identify that person?
 14 A. Just through knowledge of who within the account could
 15 help me with that information.
 16 Q. What does that mean? Did you go back to the person in
 17 the SSC that was mentioned in the call log?
 18 A. Er, I can't remember if that's what I did, because the
 19 SSC team changed. I may have done. I may have done at
 20 times but that wasn't always the case, no.
 21 Q. Would you phone them?
 22 A. I'd phone them, or -- no, not really. I didn't do a lot
 23 of over the phone. A lot of the time I would go up to
 24 the sixth floor where the SSC were based and speak to
 25 them personally because I had a lot of dealings with

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1 A. I don't know. I had --
 2 Q. Would you agree, Mr Dunks, that you, from your own
 3 perspective, could not say that what you were being told
 4 was right or wrong?
 5 A. I don't know, because I -- these were the people who
 6 dealt with these calls, so I would have had to rely on
 7 their own knowledge. I mean, if they didn't know --
 8 Q. Isn't that the answer then?
 9 A. Sorry?
 10 Q. You yourself couldn't know whether what they were
 11 telling you was right or wrong?
 12 A. Um --
 13 Q. You just said, "I would have to rely on them"?
 14 A. Yes, I suppose so, yes.
 15 Q. That's why you were actually speaking to them -- because
 16 you didn't know the answer yourself?
 17 A. I didn't know the answer prior to the investigation, no,
 18 I didn't.
 19 Q. Prior to speaking to them, you didn't know the answer.
 20 A. Yes -- no, correct.
 21 Q. So I think we've agreed that you couldn't yourself say
 22 whether what the SSC were telling you was true or false?
 23 A. I suppose so, yes.
 24 Q. Why did you want to speak to colleagues about whether
 25 a record of a call might suggest a system issue with

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1 them on lots of other issues to do with other roles
 2 within our Security Team.
 3 Q. And so you would go and speak to somebody, you can't
 4 remember how you identified who the somebody was?
 5 A. No, I don't, no.
 6 Q. Would it be whoever happened to be on shift, on duty at
 7 that time?
 8 A. More than likely, yes.
 9 Q. Did you make a record of the conversation that you had
 10 with that person?
 11 A. No. I may have -- sorry, I may have made notes of
 12 what -- on the resolution or what I needed, yeah, but
 13 I didn't make a record of the conversations, no.
 14 Q. Did you know whether you were required to make a record
 15 of your conversation with the person to whom you spoke
 16 where what they told you was essentially going to form
 17 part of your witness statement?
 18 A. No, I wasn't aware, no.
 19 Q. I take it that you didn't think that you needed to do
 20 so, even though your witness statement was going to be
 21 placed before a criminal court?
 22 A. No, I didn't -- I wasn't aware I needed to, no.
 23 Q. You personally, would you agree, couldn't say whether
 24 the thing that you were being told was actually right or
 25 wrong?

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1 Horizon?
 2 A. Because I'd have had to defer to someone who's got a far
 3 greater technical knowledge than I did.
 4 Q. We've addressed whether you thought that you needed to
 5 make a record of what they were telling you. Did you
 6 know, one way or the other, whether you had to explain
 7 in your witness statement that what you were telling the
 8 court was, in fact, not based on your own knowledge but
 9 was what somebody had told you?
 10 A. Two things there: firstly, I wasn't aware and had never
 11 been made aware that, if I'd spoken to somebody to gain
 12 that knowledge, that I had to state that; and, secondly,
 13 as I said before, I read that part of the witness
 14 statement as within my own knowledge and, if I'd done
 15 research or investigated something, at that time,
 16 I would have had that knowledge. That was from --
 17 I knew about it.
 18 Q. Who did you depend upon, if anyone, to give you advice
 19 on those sorts of issues, ie whether it was permissible
 20 to speak to somebody in the SSC; if you did speak to
 21 somebody in the SSC, whether you had to make a record of
 22 the conversation; and that if you did speak to somebody
 23 in the SSC, you should disclose that transparently on
 24 your witness statement?
 25 A. I don't know. I would have relied on management. My

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1 line management, they were aware of what I was doing.
 2 **Q.** Can you name names, please?
 3 **A.** I would have said any of my -- the Security Managers at
 4 the time. I mean, I think I've listed the ones that
 5 I remember. Brian Pinder, Pete Sewell, Donna Munro, off
 6 the top of my head, right at this moment.
 7 **Q.** Did you have access to legal advice within Fujitsu?
 8 **A.** I'm not sure. I wasn't made aware that I did, so -- but
 9 if I did, I'm sure -- no, I wasn't aware.
 10 **Q.** Were you aware that there were lawyers within Fujitsu?
 11 **A.** I think so. I can't say when or I was aware or did
 12 know, no. I don't ...
 13 **Q.** Did you ever seek advice from lawyers within Fujitsu
 14 over any of the matters that I've asked you about?
 15 **A.** No, I didn't.
 16 **Q.** Did, to your knowledge, any of your managers ever seek
 17 such advice over people in your Security team providing
 18 evidence that was based in part on what other people had
 19 said, who themselves were refusing to go to court?
 20 **A.** No, I'm not aware that anybody did.
 21 **Q.** Can we look at something else you did, as part of the
 22 process in satisfying yourself that calls either did or
 23 did not have an impact on the integrity of data, and
 24 look at page 38, please. It's paragraph 115, which is
 25 towards the bottom of the page. You say:

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1 Horizon data?
 2 **A.** In supplying the witness statements, I would have had to
 3 have satisfied myself -- because of the wording within
 4 the witness statement, I'd have had to satisfy myself
 5 that there wasn't any impact.
 6 **Q.** I'm asking, did you, therefore, see it as your role in
 7 the Security Department to give assurances that what
 8 you'd read in the call logs could have had no impact on
 9 the integrity of Horizon data?
 10 **A.** I didn't see it as -- well, yes, I saw it as my role
 11 because I was supplying the witness statements. So yes.
 12 **Q.** Did you ever provide a witness statement in all of your
 13 years in which you said that a call record did challenge
 14 the integrity of Horizon data?
 15 **A.** I don't believe I did no.
 16 **Q.** Did you ever provide a witness statement, in all of your
 17 years, in which you said that what was recorded in
 18 an HSD call record even possibly challenged the
 19 integrity of Horizon data?
 20 **A.** No, I didn't. No.
 21 **Q.** So it was all one way? Nothing you ever read over
 22 decades ever, even possibly, called into question the
 23 integrity of Horizon data?
 24 **A.** Through my -- no, I didn't, through my investigation,
 25 no, I didn't. I satisfied myself that it didn't, no.

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1 "Where there was a possibility that the issue being
 2 raised could have affected the data, I examined the
 3 records of the investigations carried out by the
 4 engineers assigned to deal within the call to confirm
 5 that they had either determined there was no impact ...
 6 or that a fix had been deployed to remedy any fault.
 7 Where I was unsure of anything, I would consult with
 8 colleagues who had come across the issues before or who
 9 had greater technical knowledge than me, such as the
 10 SSC, to better understand the nature of the issues being
 11 raised and how they were resolved, to satisfy myself
 12 that it had had no impact on the integrity of the data."
 13 You describe here the way that you went about
 14 satisfying yourself that what was recorded in call data
 15 did not have an impact on the integrity of Horizon data.
 16 Yes?
 17 **A.** Yes.
 18 **Q.** Who told you that you were supposed to satisfy yourself
 19 that call data did not have an impact on the integrity
 20 of Horizon data, ie what was recorded in the Helpdesk
 21 records?
 22 **A.** I don't think anybody said that I had to satisfy myself.
 23 I don't think anybody has used those words to me, no.
 24 **Q.** Did you see it as your role in the Security Department
 25 to give such an assurance: no impact on integrity of

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1 **Q.** Can I look at a third aspect of your approach, please.
 2 Page 59 of your witness statement, paragraph 196. You
 3 say:
 4 "When I stated that 'All of the calls were of
 5 a routine nature' ..."
 6 Just stopping there, that's a phrase that you used
 7 in, I think, all of the witness statements that you
 8 produced, ie every call that you ever read about was of
 9 a routine nature. Yes?
 10 **A.** Yes.
 11 **Q.** So:
 12 "When I stated that 'All the calls are of a routine
 13 nature', I meant that these were the type of calls which
 14 were frequently made to the HSD, and which I would
 15 regularly see when reviewing the call records. I note
 16 that some of the calls made to the HSD in respect of
 17 this branch ... related to balance discrepancies that
 18 the [subpostmaster] was stating were repeatedly shown on
 19 the system", et cetera.
 20 You say:
 21 "... I note that the calls were repeatedly referred
 22 by the HSD to the NBSC. I would therefore likely have
 23 understood this to be a commercial or user issue rather
 24 than a technical error. I would often see commercial
 25 issues such as this being raised by the [subpostmasters]

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1 and then referred to the NBSC, and therefore would have
2 considered these calls to be of a routine nature."

3 So can I summarise it that whenever you saw, in
4 an HSD record, that the call had been referred to the
5 NBSC, you believed that that was (a) a call of a routine
6 nature, and (b) did not raise a technical error,
7 a system error?

8 **A.** Correct, yes.

9 **Q.** So that involved, would you agree, an assumption that
10 the HSD were always right to refer the call to the NBSC?

11 **A.** Yes.

12 **Q.** It involved an assumption that if the subpostmaster
13 thought that the discrepancy about which they were
14 complaining was a result of a technical error, a system
15 error, then they were wrong?

16 **A.** If the call had been referred to the NBSC, yes, I would
17 have seen that as a business commercial or a user error.

18 **Q.** Yes, and what I'm asking, Mr Dunks, is that you're
19 assuming that the person in the HSD has got it right,
20 and that the subpostmaster has got it wrong.

21 **A.** No, I would assume that it had been referred to there
22 because they're assuming that, at first glance or
23 whatever, that it could have been a business issue. If
24 it turned out that further investigation would have been
25 needed, that call -- and I think I've seen it before --

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1 you wouldn't know if that happened, when it got into the
2 NBSC?

3 **A.** No.

4 **Q.** You wouldn't know if they were told in the NBSC that
5 "Clause 12 of the contract says that you must pay,
6 irrespective of fault, for all losses" --

7 **A.** No.

8 **Q.** -- and many subpostmasters did, and that the technical
9 issue that they were complaining of therefore never
10 reached the surface. You wouldn't know if that
11 happened?

12 **A.** I would have known if it needed further investigation,
13 as in the fact that it may have been a technical issue,
14 that that call would have been passed back.

15 **Q.** What about if they, in the NBSC, were told "You just
16 need to pay up"?

17 **A.** No, I -- no -- I wouldn't know.

18 **Q.** You would write all of these up as being calls of
19 a routine nature, which didn't involve the integrity of
20 the Horizon data, wouldn't you, in your witness
21 statements?

22 **A.** It was a routine nature that those calls were passed to
23 the NBSC, and we have seen those calls routinely.

24 **Q.** Isn't what you were conveying, by "All of the calls are
25 of a routine nature" was not about the frequency with

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1 a call would have been passed back for further
2 investigation to see if it was a technical issue.

3 **Q.** You were working on the basis that Fujitsu, in its HSD,
4 was correct in its categorisation of issues as being
5 commercial or business, on the one hand, and therefore
6 referred to NBSC, weren't you?

7 **A.** Yes, in a way, yes.

8 **Q.** Did you have access to, and therefore the facility to
9 examine, when a call was referred to the NBSC?

10 **A.** Sorry, say that again? Did I ...

11 **Q.** Did you have access to, and the facility, therefore, to
12 examine, what happened when a call was referred to the
13 NBSC?

14 **A.** No, we didn't. We didn't have access to the NBSC.

15 **Q.** So you don't know what happened after it had left the
16 HSD?

17 **A.** I -- what they did and what they carried out, no,
18 I don't.

19 **Q.** So if they, for example, just kept telling the person
20 "Turn your machine on and off again", you wouldn't know
21 if that was the advice --

22 **A.** No, I wouldn't, no.

23 **Q.** -- that was given. If they said to the person under the
24 contract that "You've got to pay up this discrepancy,
25 irrespective of you claiming that it's a system fault",

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1 which the calls were being made but rather about the
2 substance of the issues, ie "These calls, you can be
3 assured Mr Defendant, Mrs Defendant or court, that these
4 calls do not involve a system issue"?

5 **A.** Repeat the question, sorry.

6 **Q.** Yes. You weren't talking about the frequency with which
7 the calls were being made by saying "All of these calls
8 are of a routine nature"; you were implying that these
9 calls did not involve any system issue with Horizon,
10 weren't you?

11 **A.** No, not when saying they were of a routine nature, no.
12 They would, as I've said -- as stated in there -- that
13 the contents or the type of calls were seen frequently.

14 **Q.** Might not that mean that there was a big system issue,
15 if you were frequently seeing calls of the same nature?

16 **A.** No, I don't believe so, no.

17 **Q.** Why?

18 **A.** Because the types of the calls that I'd looked at and
19 seen.

20 **Q.** Sorry, the types of calls --

21 **A.** The types -- the contents of the calls. I mean, that's
22 what I'd have based that on.

23 **Q.** Can I turn to your approach to HSD call logs and, in
24 particular, whether you summarised them or exhibited
25 them. Did you always exhibit HSD call logs to your

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1 witness statements so that the raw materials were
 2 disclosed to the defence and to the court, or did you
 3 sometimes just summarise them in your witness
 4 statements?
 5 **A.** Sometimes just summarised them.
 6 **Q.** Why did sometimes you give disclosure of the raw
 7 materials, so that the court and the defence could
 8 actually look at them, and other times you didn't?
 9 **A.** That would have been dependent on what was requested by
 10 the Post Office.
 11 **Q.** So sometimes they would just ask for a summary and
 12 sometimes they would ask for the call logs to be
 13 exhibited?
 14 **A.** Correct.
 15 **Q.** Do you know what determined, in their mind, whether it
 16 was a summary case or an exhibiting of raw material
 17 case?
 18 **A.** No, no idea.
 19 **Q.** Was it chance --
 20 **A.** No, I --
 21 **Q.** -- for the defendant which level of service they might
 22 have got?
 23 **A.** I've no idea. I don't know, I was just basing that on
 24 what they requested. I don't know why they would
 25 request one or the other. That's --

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1 **Q.** Do you agree that gives the reader the facility to
 2 record everything that is recorded on the call log
 3 itself?
 4 **A.** Absolutely, yes.
 5 **Q.** Were there any hidden screens or hidden dropdowns, or
 6 were they all available if you did a print to see?
 7 **A.** No, that is the full contents of a call at the time.
 8 **Q.** Thank you. Can we look, please, at FUJ00083702. Just
 9 look at the email first and then we're going to look at
 10 the attachment. An email from Lisa Allen, I should say
 11 this is about Jerry Hosi's case again. You will see the
 12 email at the bottom, "Porters Avenue Post Office":
 13 "Andy
 14 "As discussed.
 15 "Can you please provide another full statement for
 16 the above office including in the outcome of the faults
 17 reported that it would have had 'no effect on any
 18 counter discrepancy'. I appear to have mislaid the
 19 original statement and so will use the copy that I have
 20 as unused.
 21 "Additionally can you exhibit the disk detailing the
 22 call logs ..."
 23 Yes?
 24 **A.** Yes.
 25 **Q.** Just remember, for future purposes, the request at the

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1 **Q.** Did it ever occur to you, "Hold on, in some cases I'm
 2 actually handing over the raw product here as an exhibit
 3 and, in other cases, I'm just summarising it"?
 4 **A.** Um --
 5 **Q.** Why is that?
 6 **A.** No, I don't think it did. I knew full well that if --
 7 the raw data, as in the complete call, was there and was
 8 available if requested. At any time that they requested
 9 any data, it was supplied.
 10 **Q.** Okay. Can we look, please, at POL00073280. This is
 11 an exhibit sheet to your witness statement dated
 12 27 September 2006 in Post Office's claim against Lee
 13 Castleton; can you see that?
 14 **A.** Yes.
 15 **Q.** We can see that it's your exhibit APD1, Andrew Paul
 16 Dunks, I think that is?
 17 **A.** Yes.
 18 **Q.** If we go over the page, please, can we see that you're
 19 exhibiting here HSD call records, yes? If we just
 20 scroll down, and just keep going. It can be done
 21 relatively quickly. Keep going.
 22 A series of HSD call records, yes? So here you are
 23 in a civil case, in a civil context, exhibiting the call
 24 logs themselves. Yes?
 25 **A.** Yes.

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1 end of the first line to include that it would have had
 2 no effect on any counter discrepancy. Okay?
 3 **A.** Mm-hm.
 4 **Q.** You replied at the top, attaching a document; can you
 5 see that?
 6 **A.** Yes.
 7 **Q.** "Please take a look and let me know if [it's] okay ..."
 8 Can we look at that attachment, FUJ00083703. Then
 9 if we scroll down, please, and go to page 2, you say, in
 10 the fifth line:
 11 "I've been asked to provide details and information
 12 on the calls for advice and guidance logged by HSH ..."
 13 That's the same as HSD, essentially, is it?
 14 **A.** Yes.
 15 **Q.** "... recorded during the period 01/09/05 to 29/11/06 for
 16 Porters Avenue", then you give the FAD code.
 17 "A report outlining each call was created and
 18 I produce the resultant CD as [your] Exhibit APD/01."
 19 You say that was sent to the Post Office.
 20 So you, in the Porters Avenue prosecution, seem to
 21 have been asked by the email to exhibit a CD with the
 22 full call logs on it and, in this witness statement, you
 23 do exactly that: you exhibit the CD, yes?
 24 **A.** Yes.
 25 **Q.** Then, if we scroll down:

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1 "I have reviewed the HSH calls pertaining to [that
2 branch in that period] there were 33 calls", and there's
3 the phrase:
4 "... all the calls are of a routine nature and do
5 not fall outside the normal working parameters of the
6 system. And in my opinion would have had no affect on
7 any counter discrepancies."
8 I'm going to examine as to how that came about later
9 on but you'll see that that's essentially the line that
10 Ms Allen asked you to insert, yes?
11 **A.** Yes.
12 **Q.** So, in this case, if we carry on scrolling, you then
13 give a summary of each of the 33 calls, by putting the
14 date and time, a reference number, what the problem was,
15 what the resolution in summary terms is recorded on the
16 call log to be and then the outcome. This first one was
17 passed to the NBSC, yes?
18 **A.** Yes.
19 **Q.** That one does seem maybe routine, "check foreign
20 currency rates", but the second one, problem of "failing
21 to rollover", "passed to the NBSC for resolution".
22 So on that one, for example, would that fall within
23 your category of, because it was passed to the NBSC,
24 that must have been a business or commercial issue, it
25 can't have been a fault with Horizon because it was

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1 **A.** It all would have depended on conversations and
2 discussions with Post Office, either Investigator or
3 lawyer. This would have always been probably the
4 starting point as in a high-level overview of the calls
5 and then it would have progressed from there. But if,
6 at the very first instance of discussions, they wanted
7 the calls submitted and an in-depth overview, that's
8 what would have been given at the starting point.
9 **Q.** Do you know how the person that you were speaking to or
10 engaging with on email from the Post Office knew what to
11 request; would they explain what prompted them to
12 request more information from you --
13 **A.** No, I don't think I remember having a conversation like
14 that at all, no.
15 **Q.** -- ie whether it was because of what they'd read in what
16 you had provided them, whether it was because the court
17 was ordering them to provide more information, whether
18 it was the defence asking for more information: what
19 prompted the unfolding of the disclosure of more data?
20 **A.** It could have been either of what you've just said. It
21 could have been where the first -- me first supplying
22 a witness statement to them, they would have looked at
23 it and reviewed it and come back and said, "Oh, we
24 possibly need to expand here or there", or -- and also,
25 depending -- because I don't know what communications

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1 passed to the NBSC?
2 **A.** Yes.
3 **Q.** Thank you. So that's one way of doing it. Here you've
4 summarised all that -- firstly, in the civil case you
5 exhibit a printout of all of the call records; do you
6 remember, in Mr Castleton's case? In the second
7 example, you exhibit a CD of the call records and you've
8 summarised them in very summary terms, yes?
9 **A.** Yes.
10 **Q.** Can we turn, please, to what happened in the Seema Misra
11 case and look at your witness statement, please. Second
12 witness statement, page 57, paragraph 192 at the foot of
13 the page. You describe in this paragraph essentially
14 how, in each statement in the Misra case, you gave more
15 and more detail of the HSD calls and that that was done
16 at the request of the lawyers and the Post Office?
17 **A.** Yes.
18 **Q.** So this was more of an unfolding picture in the Misra
19 case?
20 **A.** Yes.
21 **Q.** Again, can you help us, what determined which approach
22 you took, whether you did the first thing, gave them the
23 printouts as part of an exhibit, whether you provided
24 a CD with all of the call logs on it or whether you
25 summarised?

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1 they were having with lawyers or whatever -- defence --
2 if somebody had asked for the full disclosure of the
3 call details, they'd have come back to us and said, "Oh
4 can we have those call details?"
5 No, I'm not aware of the process they went through.
6 **Q.** Who did you take your orders from?
7 **A.** On the witness statements?
8 **Q.** Yes.
9 **A.** Well, orders -- first, it would have been the request of
10 the Post Office, of what they wanted, any changes.
11 **Q.** Can we go back to Mr Hosi's witness statement, please,
12 FUJ00083703, and look at page 2, please, and look at the
13 second paragraph down that we'd looked at. Thank you:
14 "I have reviewed the ... calls pertaining to Porters
15 Avenue [between those dates] there were 33 ... and all
16 the calls are of a routine nature do not fall outside
17 the normal parameters of the system. And in my opinion
18 would have had no effect on any counter discrepancies."
19 In order to provide that opinion, had you spoken to
20 anyone in the SSC in relation to any particular call or
21 calls?
22 **A.** Would have gone through the same process that I would
23 have done every single time, and got as much information
24 as I possibly could.
25 **Q.** Had you in fact spoken on this occasion in relation to

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1 any of these 33 calls to anyone in the SSC?

2 A. No, I can't remember if I did. I honestly can't

3 remember.

4 Q. You can't remember in part because it's not recorded on

5 the face of the witness statement whether you did or

6 didn't --

7 A. Correct.

8 Q. -- and there's no other record of whether you did or you

9 didn't --

10 A. Correct.

11 Q. -- and so you can't tell us the extent to which the

12 opinion that you formed there was or was not affected,

13 or was influenced, by the views of others?

14 A. No, no.

15 Q. Can we go to page 13, please, of the witness statement.

16 You refer in page 13 to two particular calls, one ending

17 in 970 -- if we just scroll down a little bit, thank

18 you -- and one ending 008. You say, those two calls:

19 "... referred to a 'critical event', 'Critical

20 NT_Error'. The term critical is the comparative level

21 of attention required to generate remedial action. It

22 refers to the level of attention required on a grading

23 system for example critical high level of attention or

24 warning would be medium level of attention. These

25 critical events occurred outside the post office opening

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1 what took place for that call.

2 Q. Okay, I'll move on. Can we look at POL00052220. This

3 is an email chain in mid-2009 concerning your first

4 witness statement in the Seema Misra case. Can we start

5 with page 4, please. Just scroll down, I think this is

6 the first email in the chain. You're emailing Dave

7 Posnett; do you remember who Dave Posnett was?

8 A. I believe he was an Investigator or part of the Security

9 Team within Post Office.

10 Q. Thank you. It's 22 June 2009. I should say that your

11 witness statement eventually -- your first witness

12 statement in Misra -- came to be signed on 30 June 2009.

13 You say to Mr Posnett:

14 "Hi Dave,

15 "Please have a look at the attached Witness

16 Statement for West Byfleet HSH calls logged. Can you

17 let me know if this is okay and I'll print/sign and post

18 it to you."

19 If we go to page 3, please, and if we scroll down,

20 please, we'll see his reply on the 22nd; can you see

21 that?

22 A. Mm-hm, yes.

23 Q. "Andy,

24 "Statement looks fine to me, though I've copied Jon

25 Longman (Officer in Case) for his [information]. My

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1 times and a standard action of a reboot of the systems,

2 which would also highlight any further issues, was

3 undertaken and repaired the problem and confirmed

4 stability of the system. I should add that this is not

5 my particular area of expertise. I have a general

6 knowledge of these procedures and have made the comments

7 above to aid the court."

8 Where did you get that information from?

9 A. I can't remember specifically where I got that

10 information from. No, I can't say exactly where I got

11 it from.

12 Q. Do you agree you would have got the information from

13 somewhere else?

14 A. Yes.

15 Q. That wasn't your own personal knowledge?

16 A. Part of that, yes. Yes, I agree.

17 Q. So you're providing an opinion there, acknowledging that

18 this isn't your particular area of expertise, based on

19 somebody else's opinion?

20 A. No -- oh, what you mean generally or those particular

21 calls?

22 Q. Well, you say, amongst the things that are included in

23 that paragraph, that the reboot of the system repaired

24 the problem?

25 A. Yes, yeah. I mean, that's -- yeah -- trying to explain

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1 only query would be that the log of 107 calls may need

2 to be produced as evidence or be disclosed as unused

3 material. If produced as evidence then it could be

4 incorporated in your statement now or produced in

5 a 'further to' statement later. I'll let Jon comment on

6 this though, as the court may be happy as it is.

7 "Jon,

8 "Can you give Andy the green light and/or comment on

9 my thoughts above."

10 So it seems that your statement mentioned 107 calls.

11 You were picked up on this and, if we scroll up, please,

12 we can see Mr Longman's reply:

13 "The statement is fine but the mention of 107 calls

14 will no doubt interest the defence barrister. If

15 possible could you include in the statement a breakdown

16 of the calls to cover time/date/nature of call. If we

17 don't include it now the defence will only request this

18 information later."

19 Then scroll up, please. Your reply:

20 "107 calls may seem a lot but that only equates to

21 approximately 3-4 calls a month over the time frame."

22 Just stopping there, is it right that you saw it as

23 routine for branches to have to call the Fujitsu

24 Helpdesk three to four times a month, ie nearly every

25 week?

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1 A. Routine? Well, I would have said so. At the time,
 2 I would have looked at the number of calls, I've done --
 3 I would have done the maths and looked -- and through my
 4 knowledge of dealing with Helpdesk calls, one call
 5 a week, in my opinion, didn't seem that much.
 6 Q. Did you use the frequency of the calls as a proxy for
 7 whether or not the substance of the calls was routine?
 8 A. The frequency, at that time, I was just trying to
 9 explain.
 10 Q. Overall, did you use the frequency of calls as a proxy
 11 for whether the substance of the calls was routine?
 12 A. No, I don't believe I did.
 13 Q. So the frequency, to you, wasn't a relevant issue?
 14 A. Um ... I don't know whether I'd have taken that into
 15 consideration. I was just talking about that -- he'd
 16 made a statement about 107 calls seems a lot, so I just
 17 did the maths and sort of went back to him and gave my
 18 opinion that I didn't think it --
 19 Q. Okay, you carry on:
 20 "To add the information you want is going to take
 21 1 to 2 days of uninterrupted work to complete. So to
 22 get it [done] is not impossible it would be cutting it
 23 fine ...
 24 "If you need the extra detail I will enquire about
 25 when we can get this to you ..."

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1 A. I don't -- no, I think that was an add-on, because we
 2 got the -- I can't remember the details of what the
 3 first -- that witness statement I supplied him with.
 4 Q. Okay. I can maybe check that to see what was --
 5 A. Yeah, I don't know the progress and how that -- I can't
 6 remember how that worked. I don't believe it was just
 7 a statement saying "Oh, there was 107 calls".
 8 Q. Can we look at what happened after you signed the
 9 witness statement off on 30 June. Scroll up, please.
 10 Keep going to page 1, please. We see a chain that
 11 I don't think includes you, between Penny Thomas, Dave
 12 Posnett and Jon Longman. So Fujitsu to two Post Office
 13 men:
 14 "Dave
 15 "An approximate estimate for this work is:
 16 "ARQs [£13,000-odd]
 17 "Helpdesk Calls -- individual breakdown £1,800.
 18 "Call-type breakdown £630.
 19 "Do you want me to arrange a formal estimate?"
 20 Was the level of information that you provided in
 21 the witness statement affected by the cost of the
 22 provision of it?
 23 A. Well, I never knew there was an individual cost.
 24 I don't believe I ever knew there was an individual cost
 25 of the work I was doing. I understood that the whole

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1 Then if we scroll up to page 2, please, Jon Longman
 2 says:
 3 "Let's run with the statement as it is. If the
 4 defence do want details of the 107 calls then a further
 5 statement will be needed at a later stage. Maybe you
 6 could add into your statement that the total calls only
 7 work out at 3-4 a month over the time period and that is
 8 not a high amount for a [post office]."
 9 Again, would the substance of the calls make
 10 a difference as to whether the number was significant?
 11 A. At that time, I believe I was just giving an opinion
 12 that I didn't think that the frequency or the number --
 13 I don't believe at the time that's to do with the
 14 substance. It was the frequency -- because he'd asked
 15 that there were -- seemed a lot of calls there but, in
 16 my opinion, I didn't think that there was.
 17 Q. So I think you were content to provide a statement with
 18 the addition proposed by Mr Longman, because you reply
 19 "Okay [I'll] add this to the statement and get it
 20 posted", agreed?
 21 A. Yes, yeah.
 22 Q. So, in summary, at this stage, you're not providing the
 23 substance of the calls, you're providing a witness
 24 statement that says how many there are and that that is
 25 not a high number?

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1 ARQ process was covered under an agreement on --
 2 based -- and payment on a number of ARQs we supplied.
 3 I mean, I never -- I've never seen this. I don't
 4 believe I ever knew that someone was giving this --
 5 an estimate of cost or charging on the work I carried
 6 out.
 7 Q. So if there was an effect on the level of service
 8 provided, by reference to the amount that it costed,
 9 that information never found its way to you?
 10 A. Correct.
 11 Q. If we just scroll to the top of the page, thank you, you
 12 can see that that chain doesn't then find its way on to
 13 you. So, in summary, on this aspect of the story, you
 14 just did what you were asked to do by Post Office, is
 15 that right, and didn't know the extent to which
 16 financial considerations affected the choices that they
 17 made?
 18 A. Absolutely, no.
 19 Q. Thank you. Can we go on, please, to FUJ00122673. This
 20 is still in the context of the Seema Misra case and can
 21 we look, please, at the bottom of page 1, and the top of
 22 page 2. Just to scroll up a little bit more, please.
 23 Thank you. We can see we're December 2009 from you to
 24 Jon Longman. You say:
 25 "Hi Jon,

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1 "Please find below answers to the questions you
2 asked.
3 "Can you confirm how you want the complete call
4 information, do you want the whole call transferred to
5 a CD in its raw state. There are over 100 of these."
6 Then if we scroll up, please, and keep going. No
7 more relevant information there. You appear to be
8 querying, in this chain, in relation to what would be
9 your second witness statement, which you were to sign
10 off on the 29 January 2010, whether you should
11 essentially exhibit the CD; is that right?
12 **A.** Can you just scroll down, please?
13 **Q.** Yes, and again, please. Maybe we should see the below
14 questions. If we scroll a bit further. The answers
15 haven't come out in red. If we just scroll back up,
16 please. Thank you. You say:
17 "Please find below answers to the questions you
18 asked.
19 "... confirm how you want the complete call
20 information, do you want the whole call transferred to
21 a CD in its raw state. There are over 100 of these."
22 Can you help us with what you were asking?
23 **A.** I think that the "Please find below answers to your
24 questions", now seeing the contents, they were to do
25 with the answers about the counters which are passed on
81

1 "Further to [a previous witness statement] I provide
2 a CD AD/01 containing details of all calls logged from
3 West Byfleet ... between [those two dates]."
4 So would this have been in response, essentially, to
5 that email we saw of 16 March?
6 **A.** Exactly, yes. Well, I'm assuming, yes.
7 **Q.** That worked its way through to you somehow?
8 **A.** Mm-hm.
9 **Q.** Does it follow from, at least at this date, Mrs Misra's
10 defence team had available to them the underlying call
11 data upon which your earlier summaries were based?
12 **A.** Yes, I think so, yes.
13 **Q.** Can you help us with what would have been on the CD as
14 AD/01?
15 **A.** I'm guessing -- I'm assuming it would have been as we
16 saw before, the call logs in their entirety.
17 **Q.** Okay, so a series, one after the other, of 107 call logs
18 between those two dates?
19 **A.** Correct.
20 **MR BEER:** Thank you.
21 Sir, that is an appropriate moment for the second
22 break. I wonder if we can break until 12.35 to?
23 **SIR WYN WILLIAMS:** Yes, before we do, in case we've missed
24 it, and it's in my head, Mr Dunks did you give oral
25 evidence in Mr Hosi's case?
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1 to Leighton Machin, and I then forwarded them those.
2 "Can you confirm how you want to complete", that's
3 probably through a discussion of supplying the call
4 data. Does he want them printed out or -- I'm guessing
5 there, sorry. That may have been to do with did he want
6 them all printed out and sent or does he want them all
7 on a CD? It's just over how he wanted them.
8 **Q.** It's not whether or not the raw data should be provided?
9 **A.** Absolutely not, no.
10 **Q.** Do you know why you wouldn't provide the raw data at
11 this stage in one form or another?
12 **A.** Depending on the request that they, the Post Office,
13 wanted.
14 **Q.** Okay, can we move forwards, then, to FUJ00153059. If we
15 look, thank you, scroll down, please. That's it. Just
16 there, bottom of that last email. Can you see, if we
17 scroll up a little further, an email between Mr Longman
18 and Penny Thomas, we're now on 16 March, third
19 paragraph:
20 "... we will need Andy to produce the disk
21 containing the raw data of Helpdesk calls from 1 January
22 2005 to 31 December 2009 ..."
23 Then if we go forwards, please, to POL00058443, and
24 page 7, please -- scroll down -- we can see a witness
25 statement of yours, dated 30 March 2010, and you say:
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1 **A.** In which case, sorry?
2 **SIR WYN WILLIAMS:** Mr Jerry Hosi?
3 **A.** That's Porters Avenue, is it?
4 **SIR WYN WILLIAMS:** Yes.
5 **A.** I don't believe I did, no.
6 **SIR WYN WILLIAMS:** All right. Thank you. Yes, fine. Yes,
7 12.25 -- sorry, what time did you say?
8 **MR BEER:** 12.35, please.
9 **SIR WYN WILLIAMS:** 12.35, yes.
10 **MR BEER:** Thank you very much, sir.
11 (12.24 pm)
12 (A short break)
13 (12.35 pm)
14 **MR BEER:** Good afternoon, sir, can you see and hear us?
15 **SIR WYN WILLIAMS:** Yes, thank you.
16 **MR BEER:** Good.
17 Mr Dunks, you remember that I asked you about that
18 email exchange in mid-2009, concerning Seema Misra's
19 case, in which you had provided a witness statement
20 saying that there had been 107 calls to the Helpdesk,
21 and this was picked up and you were asked for more
22 information because otherwise the defence barrister will
23 only ask for it, and there was a question over how
24 detailed your first witness statement had been, the
25 witness statement that had been served on 30 June 2009,
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1 you said you don't think you would have just included
2 the number in the witness statement, or words to that
3 effect.

4 Can we look at that witness statement, please,
5 POL00051960. This is your witness statement of 24 June
6 2009, which was served under a notice of additional
7 evidence on 30 June 2009. If we just scroll down, we
8 can see some standard paragraphs. No need to read all
9 of those. We're going to come back to the detail of
10 these boilerplate paragraphs later. Then at the bottom
11 of the page, you say:

12 "An important element of the support provided to
13 subpostmasters and counter clerks is the Horizon
14 Helpdesk [It] is the Horizon user's first 'port of
15 call,' et cetera.

16 Then five or six lines in, you say:

17 "I have been asked to provide information pertaining
18 the working condition of the Horizon system."

19 I think that must mean:

20 "I have been asked to provide information pertaining
21 [to] the working condition of the Horizon system. The
22 following information constitutes the calls logged by
23 HSH [for West Byfleet between 30 June '05 to 14 January
24 '08]. I have the reviewed the calls [between that
25 period]. There were 107 calls ... this equates to

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1 you cut into the witness statement bits of the call
2 logs. Again, just one last time, what determined what
3 the entry-level point was, ie first statement you
4 provided?

5 A. The -- on the request of the Post Office, what they
6 wanted.

7 Q. Did you have any clue as to what was motivating them or
8 what was influencing them as to what to ask for?

9 A. None whatsoever, no.

10 Q. Okay. Can we turn to a separate issue, then, namely
11 what the standard paragraphs in the witness statement --
12 what I've described as boilerplate paragraphs -- meant
13 or were intended by you to mean. Can we look, please,
14 to start with at FUJ00155555.

15 If we scroll down, please -- and again, that's the
16 bottom of the chain, just scroll up, thank you --
17 an email at this point, not copied to you, it's about
18 a witness statement, it's between Mr Posnett, Mr Hooper
19 and Mr Ward; do you remember who Graham Hooper was?

20 A. Graham Hooper was the Security Manager, I believe, at
21 the time.

22 Q. We see him described as CS Security Manager. Would that
23 be Customer Support Security Manager?

24 A. Yes, Security came under Customer Support.

25 Q. Okay. So would he have been a manager of you at the

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1 between 3 and 4 calls a month which is average for this
2 size post office. All the calls are of a routine nature
3 and do not fall outside the normal working parameters of
4 the system or would affect the working order of the
5 counters."

6 I think that must mean "nor would they affect the
7 working order of the counters".

8 So, I think, in fact, you did provide a very short
9 witness statement that just gave the number and the
10 opinion, rather than any more information; is that
11 right?

12 A. It appears so, yes. Yeah.

13 Q. Thank you. Was that a standard approach to provide
14 a summary of the number and an explanation of what HSH
15 was and then put the opinion at the bottom, and then
16 wait to see what happened?

17 A. There was no standard approach. I mean, once we had
18 received a request from the Post Office for Helpdesk
19 calls, there would have been a discussion or a request
20 of what they wanted at the time. So it would have been
21 on their request of what was supplied.

22 Q. We saw earlier, in Mr Hosi's case, you provided
23 a summary --

24 A. Yes.

25 Q. -- that ended up being a 13-page witness statement and

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1 time?

2 A. Yes.

3 Q. Thank you. We know who Graham Ward is in the Post
4 Office:

5 "Graham [I think that's Graham Hooper],

6 "Just a quick note to thank you for the above in
7 relation to the Horizon system ... This evidence was
8 allowed to form part of the case and the defendant was
9 ultimately found guilty of 8 false accounting charges
10 and 1 theft charge. I appreciate the fact you supplied
11 the statement, especially given the short notice you
12 received."

13 Then scroll up, please. Mr Hooper forwards that on
14 to Martin Riddell; who was he?

15 A. Not sure.

16 Q. Was he in Fujitsu?

17 A. Yes, I believe so, yes.

18 Q. Are all the other people on the copy list there in
19 Fujitsu?

20 A. Yes.

21 Q. He, Graham Hooper, says:

22 "... another good result supported by Horizon
23 evidence."

24 You're included.

25 A. Mm-hm.

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1 Q. Then if we scroll up, Martin Riddell replies to everyone
 2 saying:
 3 "Well done to everyone involved. If I was a caring,
 4 sharing manager I would buy a drink for everyone
 5 involved.
 6 "But I'm not.
 7 "So I won't."
 8 Were you involved at this early stage, 2002 --
 9 September 2002 -- in the provision of witness statements
 10 for the purposes of Horizon-based prosecutions?
 11 A. I don't know. I know I started on the Post Office
 12 Account in 2002. I don't know when or how long I'd been
 13 working on the account at that time, and I can't --
 14 Q. This -- I'm so sorry.
 15 A. No, I can't recall if I was involved in that.
 16 Q. At this stage, September 2002, was there a standard form
 17 witness statement in use within the Security Team?
 18 A. I can't remember. I believe so but I can't remember.
 19 Q. Do you always, throughout your time over the years,
 20 remember using standard form witness statements?
 21 A. Yes.
 22 Q. Can we turn, please, to FUJ00152205.
 23 Thank you. We can see, on the top right, this is
 24 an earlier copy of the Fujitsu policy concerning
 25 Prosecution Support for Network Banking; can you see

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1 A. Yes.
 2 Q. It's asterisked, which suggests that Mr Ward did indeed
 3 return a comment as a reviewer; can you see that?
 4 A. Yes.
 5 Q. Again, there's a passage in the body of the document
 6 which refers to a template witness statement of fact
 7 being annexed as an Appendix 2. Can we turn to that
 8 Appendix 2, please, which on page 27. Can we see that,
 9 over that page, Appendix 2, "Witness Statement of Fact",
 10 and if we just scroll on, quite quickly if we can.
 11 Thank you. Just on that page and then the next page.
 12 It goes right up until page 32. Can you see, again,
 13 each paragraph is headed by a capital letter?
 14 A. Yes.
 15 Q. Yes. Thank you very much. If we just quickly go back
 16 to page 21. If we look, please, at paragraph 7.2.4.1,
 17 third paragraph:
 18 "The statement shall follow the standard format and
 19 layout for witness statements of fact provided in
 20 evidence. Contents of witness statements of fact are
 21 flexible depending on the specific requirements of each
 22 case and the knowledge of the witness giving the
 23 statement. An example of a witness statement of fact is
 24 provided in Appendix 2."
 25 Did you know about this policy, that the company had

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1 that?
 2 A. Yes.
 3 Q. It's dated 26 November 2002. Remember, the other one we
 4 looked at was dated 29 February 2005, earlier on.
 5 Incidentally on that, there is no need for people to
 6 write in to the Inquiry to say that the 29 February 2005
 7 didn't exist because it wasn't a leap year. We've had
 8 lots of emails over the course of the Inquiry pointing
 9 that out. Thank you to everyone!
 10 You can see that the abstract is again of a similar
 11 type:
 12 "This document outlines the end-to-end procedures
 13 required to manage and deliver Network Banking
 14 Prosecution Support ..."
 15 We can see who the contributors were: this time your
 16 manager, Mr Hooper; Jan Holmes; and Richard Laking. Can
 17 you help --
 18 A. No, I don't recall.
 19 Q. If we look, please, at the approval authorities on
 20 page 2, and scroll down, please. I think we can see
 21 that, in the box in the middle of the page there, under
 22 "Optional Review", one of the options was Graham Ward;
 23 can you see that?
 24 A. Yes.
 25 Q. He being a Post Office manager, yes?

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1 produced a policy saying an example of a witness
 2 statement of fact is provided in Appendix 2 and
 3 a template witness statement was provided in Appendix 2?
 4 A. This was in the year that joined. I don't know whether
 5 I was actually given this document to read. I don't
 6 remember seeing this, no.
 7 Q. Can we go back, please, to page 31 within the template
 8 witness statement. Page 31, the foot of the page,
 9 paragraph Q. You'll see that the boilerplate paragraph
 10 Q is:
 11 "There is no reason to believe that the information
 12 in this statement is inaccurate because of the improper
 13 use of the computer. To the best of my knowledge and
 14 belief at all material times the computer was operating
 15 properly, or if not, any respect in which it was not
 16 operating properly, or was out of operation was not such
 17 as to effect the information held on it. I hold
 18 a responsible position in relation to the working of the
 19 computer."
 20 Were you required to say that -- what's in that
 21 paragraph Q -- in each and every case?
 22 A. Was I required? I don't know what the requirements
 23 were.
 24 Q. In all of your witness statements we see that paragraph?
 25 A. Yes.

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1 Q. Why did you include it?
 2 A. Because it was in the witness statement template that we
 3 had been told to use.
 4 Q. How did you know whether it was true or false?
 5 A. These -- actually, I don't -- are these -- are you
 6 talking about ARQ witness statements?
 7 Q. This appears in both species of witness statement, ARQ
 8 and HSH.
 9 A. Yeah, I mean the overall of that is to the best of my
 10 knowledge at the time. So I believed that everything
 11 was working as it should.
 12 Q. How did you know it was?
 13 A. Well, in respect of ARQs, I knew that there was checks
 14 being made every time we extracted data and, in respect
 15 of the HSD calls, it would have been looking in the
 16 calls and I believe it is operating as it should and as
 17 it's expected.
 18 Q. What's the "it" in that sentence?
 19 A. The counters and --
 20 Q. Stop there. You believe, when you signed a witness
 21 statement that included that paragraph, that it was
 22 testifying to your belief that the counters were working
 23 properly?
 24 A. Were working as expected, yes.
 25 Q. Sorry, I interrupted you. You said, "The counters and"?

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1 Then you set it out. I'm not going to re-read it.
 2 Over the page, please, you say in 97:
 3 "I note that this paragraph is included in the
 4 template witness statement appended", the document we've
 5 just looked at, yes?
 6 A. Yes.
 7 Q. What was the purpose of noting that there in
 8 paragraph 97; can you help us?
 9 A. I think an example of when it was used.
 10 Q. You weren't saying by that paragraph that you drew that
 11 part of the witness statement from that policy?
 12 A. No, I didn't, no. I didn't.
 13 Q. You just took it off the template that was on the
 14 system?
 15 A. It was -- yes, it was included in the template, yes.
 16 Q. Thank you. At 98, you say:
 17 "My understanding at the time was that I was
 18 confirming that I had not improperly used the audit
 19 extraction software to manipulate the data that was
 20 exhibiting, and that as far as I was aware the software
 21 had run properly when extracting the data."
 22 You see here in this witness statement you're saying
 23 that you believed that the boilerplate paragraph was
 24 referring to the audit extraction software.
 25 A. Yes.

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1 A. Um ... well, it's trying to explain that the post -- the
 2 branch and the counters were working as expected, as to
 3 not to affect the integrity of the data.
 4 Q. So this is providing a view, an opinion, an assessment,
 5 on Horizon itself, in your mind?
 6 A. In respect of the branches and the integrity of the
 7 data, yes, my opinion.
 8 Q. I'll ask again: how would you know whether that was true
 9 or false?
 10 A. I would have made that my opinion based on the
 11 investigation that I carried out.
 12 Q. How could you tell, how could you say, that there was no
 13 reason to believe that the information is inaccurate
 14 because of improper use of the computer?
 15 A. Again, I mean, I made my -- that assumption, my opinion,
 16 on an individual basis of every call that I looked at,
 17 and I was being asked for an opinion, and that was my
 18 opinion.
 19 Q. Can we turn to your Inquiry witness statement, please,
 20 your second Inquiry witness statement, at page 33 at
 21 paragraph 96. Page 33, paragraph 96, foot of the page,
 22 you say:
 23 "The witness statements I supplied in respect of the
 24 production of ARQ records contained the following (or
 25 very similar) wording ..."

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1 Q. If we scroll down to paragraph 100, you say:
 2 "I did not believe I was verifying that the Horizon
 3 system as a whole was operating properly at all times,
 4 or that there could not have been any software errors
 5 that affected any of the information held within it."
 6 So you're here saying, firstly, do you agree, that
 7 when you wrote or included the paragraph in each of your
 8 witness statements, you had a positive understanding of
 9 what it meant and what it did not mean?
 10 A. Yes.
 11 Q. And is that true, that you can remember that standard
 12 paragraph Q was one that you held a belief at the
 13 relevant time as to what it did mean and what it didn't
 14 mean?
 15 A. At the time of writing these statements, yeah, I would
 16 have had a -- yes.
 17 Q. And that it was only limited to the reliability or
 18 improper use of the audit extraction software and not
 19 relating to Horizon as a whole?
 20 A. Yes.
 21 Q. Are you sure that that was your contemporaneous belief
 22 over each of the years when you were signing this
 23 template statement in prosecutions?
 24 A. Yeah, I would have held that position. Yes, I would
 25 have done.

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1 Q. Can we look, please, at FUJ00201401. This is
2 a transcript of your evidence to the High Court in the
3 Group Litigation. It's dated 20 March 2019. Can we go
4 to page 28, please -- oh, I see, we're on 28. At the
5 foot of the page. 28, at the foot of the page.

6 We can see where the transcript of your evidence
7 begins. You're sworn?

8 A. Yes.

9 Q. Can we go forward to page 41, please. You're being
10 cross-examined here by Mr Miletic, and can you see in
11 the second question, third line, he says:

12 "And then paragraph 8, again, I just want to be very
13 precise, I want to make sure I understand exactly what
14 is being said in this statement, paragraph 8 begins:

15 "'There is no reason to believe that the information
16 in this statement is inaccurate ...'

17 "Pausing here, what is 'this statement'? Do you
18 mean your witness statement?

19 "Answer: Yes.

20 "Question: Okay:

21 "'There is no reason to believe that the information
22 in this [witness] statement is inaccurate because of the
23 improper use of the system.'

24 "What is the 'system' there? Is that the system of
25 the process of strategy thing audit data, or is it

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1 Q. The questioning does continue:

2 "Answer: I think I was meaning about the improper
3 use of the audit data extraction system.

4 "Question: So when you say 'system', you mean the
5 process of extracting audit data?

6 "Answer: Yes, I do."

7 Then it continues:

8 "Question: I see, so", and then there's the quote.

9 Then it goes on to deal with a separate issue,
10 namely what "at all material times" meant.

11 So when you told the court that you weren't sure
12 what you were meaning by the boilerplate paragraph, how
13 is it that your memory seems to have improved five years
14 later, that you were definitely meaning, throughout
15 time, only the system used to extract audit data?

16 A. I don't know. I mean, being on -- put on the spot at
17 the time, I'm not sure I fully understood the question,
18 or whatever, but I am not sure and I can't remember what
19 my thought process was at the time.

20 Q. Thank you. Can we turn to a separate topic, please,
21 South Warnborough and Mrs Josephine Hamilton's case.
22 This is dealt with in your second witness statement in
23 paragraphs 183 to 189 on pages 56 onwards. I'm not
24 going to read what you say there though, they're for the
25 record but, instead, can I take you to some email

99

1 something else?"

2 Just stopping there, you can see that you're being
3 asked very similar questions to the ones I've asked
4 already, albeit this is a different witness statement
5 that contains the same boilerplate paragraph. So you're
6 asked:

7 "What's the 'system' there? Is that the system of
8 the process of extracting out data, or is it something
9 else?

10 "Answer: Good question. There's no -- I'm not sure
11 what I was meaning by that, 'There is no reason to
12 believe ...'

13 "Question: We will take this step by step ..."

14 Then it continues. Just stopping there, you were
15 saying to the court that you didn't know what you meant.
16 You say, "I'm not sure what I was meaning by the
17 'system' and that there is no reason to believe". How
18 is it had in 2019 you were saying on oath that you were
19 not sure what you meant by the boilerplate paragraph but
20 now, in your witness statement five years later, you
21 tell us that you knew that it meant only the audit
22 extraction software and not Horizon more generally?

23 A. Looking at this now and going over it, I am not sure
24 what I was thinking at the time or what I was trying to
25 remember.

98

1 exchanges, please, starting please with FUJ00225544.

2 Can we look at the bottom email first, please, we're
3 on 13 January 2007 -- if we just scroll up, thank you --
4 from Mr Ward to you, about a witness statement that you
5 had made in Josephine Hamilton's case. Mr Ward says:

6 "Andy

7 "I've made one or two minor amendments ... put all
8 the text into the same font, spelling of South
9 Warnborough and also put (???) followed some acronyms so
10 you can explain in full ... (I know some are explained
11 later in the statement but to make things easier for
12 a barrister and jury any acronyms should be explained
13 the 1st time they appear in a statement). Most of the
14 explanations of the calls make sense to me aside from
15 the one below and which appears to suggest a fault ...
16 can you simplify what this one means?"

17 You'll see that he identifies a call ending 1106;
18 can you see that?

19 A. Yes.

20 Q. If we scroll up, please. You reply later that day on
21 the Saturday:

22 "I will make the amendments on Monday, but I had
23 posted a copy of the statement on Friday just in case it
24 was okay so please ignore."

25 Can we look at the statement, please, the one that

100

1 you signed off on 14 January 2007, POL00044482. This is
2 your witness statement of 14 January 2007 in Josephine
3 Hamilton's case. Can we look at page 3, please. If we
4 scroll down to look for the call ending in 1106, it's in
5 the middle of the page there, it's got an asterisk on
6 it:

7 "New call [this is 21 April 2004] taken by Richard
8 Postance: Critical NT_error occurred at ... 'the device
9 ... did not respond within the timeout period' ...
10 "Resolution: An automatic error event was picked up
11 by the [System Management Centre] (2nd line support) and
12 a call was logged. The [System Management Centre]
13 referred to KEL (Known Error Log) ... A remote reboot of
14 the counter was carried out, which did not resolve the
15 problem. [A priority call] was raised [you give the
16 number] to contact and advise the [postmaster] for
17 a manual reboot. Call closed by Kevin Pearson ..."

18 So that's the one that Mr Ward was saying that that
19 tended to indicate a fault, yes?

20 A. Yes, that's what he was saying.

21 Q. He was asking for clarification?

22 A. Yes.

23 Q. You don't, I think, provide clarification here, do you?

24 A. I don't -- well, I haven't got an email with it on.

25 I don't know whether I spoke to him regarding that.

101

1 A. Well, the following call was raised, an A priority,
2 which was the next call in line, and it appears that the
3 reboot didn't solve the issue, so an engineer was sent
4 to swap over the base unit.

5 Q. So you're looking at the call ending in 0123?

6 A. Yes.

7 Q. So the question that was asked of you by the
8 Investigator was whether it disclosed a fault, and you
9 didn't answer it, did you?

10 A. Well, not by email, no.

11 Q. Or in your witness statement?

12 A. No, because, at the time, I would have done an
13 investigation. The work I'd done on that -- looking
14 into the --

15 Q. Sorry, you said you'd have done an investigation. What
16 investigation would you have done?

17 A. I'd have carried out the same investigation that I would
18 have done for any witness statement at any cause; I'd
19 have spoken to people, I'd have looked at things to
20 clarify that I was happy to make that statement.

21 Q. What would you have looked at?

22 A. Anything available for me.

23 Q. Such as?

24 A. I mean, that's got -- KELs -- I'd have looked in there.

25 Q. You'd have looked at KELs, would you?

103

1 Q. Well, in the witness statement you don't, do you? If we
2 just carry on scrolling through to the end because
3 sometimes you, at the end of the witness statement, have
4 a mop-up paragraph dealing with any possible faults, and
5 so it ends. So he was saying this entry on the HSD log
6 is suggestive of a fault and asking whether that call
7 did describe a fault, and you don't address it do you?

8 A. No, not in the final witness statement, no.

9 Q. Not in your email either, did you?

10 A. Not by email, I didn't -- well, it doesn't appear that
11 I was -- I responded back to him with it, no.

12 Q. If we go back to page 3 and look at the entry, it says
13 that a remote reboot was carried out which didn't
14 resolve the problem. A priority was raised, priority
15 call was raised, and advice for the postmaster for
16 a manual reboot and then the call was closed. So, on
17 its face, it doesn't record that there was any
18 resolution to the problem, does it? Just that the call
19 was closed?

20 A. No, the advice was to contact -- raise another call to
21 get the postmaster to do a manual reboot.

22 Q. Yes, and it doesn't record whether that was successful,
23 does it?

24 A. Not on that particular call, no.

25 Q. On any other call?

102

1 A. I would have done, yes.

2 Q. There are two KELs mentioned there, aren't there?

3 A. Yes.

4 Q. One "rcoleman", ending in "3J", and one "pcarroll",
5 ending in "9Z", aren't there?

6 A. Yes.

7 Q. So you would have gone off and searched up those two
8 Known Error Logs, would you?

9 A. Yes.

10 Q. And, what, been satisfied that what was disclosed on
11 those Known Error Logs itself didn't assist in saying
12 that there either was or was not a fault in Josephine
13 Hamilton's branch being reported on this occasion?
14 A. I would -- yeah, I would have looked at each of -- both
15 of those KELs and, again, the same as I would have done
16 with the Helpdesk calls. If I didn't understand the
17 clarity -- I'd have got some clarity from the SSC
18 because the KELs are written by the SSC, to understand
19 what's the wording and the steps and what it's trying to
20 explain.

21 Q. So looking at the first KEL, "rcoleman", ending in "3J",
22 can we look at that, please. FUJ00059070. Can we see
23 that's the KEL, "rcoleman", ending "3J"?

24 A. Yes.

25 Q. Can you see if we scroll down, the problem:

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1 "NT has detected a fault on disk-drive or IDE
2 controller", and then there's some code.
3 Can you tell us what all that code means, please?
4 **A.** Now, no. I can't recall what everything there says or
5 means, no.
6 **Q.** Would you have been able to understand all of that code
7 at the time?
8 **A.** Well, yes, I would have done. Well, I say understand,
9 I'd have got a knowledge of what that all meant, yes.
10 **Q.** How would you have got a knowledge of it?
11 **A.** By, as I said, speaking to the -- someone within the
12 SSC. These are their words and there their Known Error
13 Logs, so they would have written them.
14 **Q.** They're the experts, not you --
15 **A.** Yes.
16 **Q.** -- and they were the experts that didn't want to give
17 evidence?
18 **A.** Yes.
19 **Q.** "Solution -- Helpdesk
20 "First check for other events which may have lead to
21 this error, such as a bad block or corrupt storage unit
22 events. If such events exist follow the appropriate
23 KELs for those ... To test if the error is simply
24 a result of processor delay due to intensive processing
25 by the counter at the time of the event, reboot [the]
105

1 Riposte present ... IF NOT passed to SSC", et cetera.
2 So reading the entry on the Helpdesk and reading
3 these two KELs, which you say you would have done, how
4 were you able to say that what you read did not disclose
5 anything other than the system operating properly?
6 **A.** Again, from my understanding of discussing -- I mean
7 I would have asked -- I would that have had discussions
8 with someone within the SSC to explain what was going
9 on, we'd have looked at the call to see what the steps
10 were, and -- I mean, this is a Known Error Log so these
11 errors have been seen before.
12 **Q.** Is that a good thing?
13 **A.** Well, there's always going to be certain errors and it's
14 how they're dealt with. It's how they're dealt with
15 that's the process.
16 **Q.** How were you able to say that this had no affect on the
17 operation of Horizon?
18 **A.** No, proper affect on the counters. It's still working
19 as expected, there may have been faults at the counter
20 but, again, that's within the boundaries and integrity
21 of the Horizon system. I believed -- my opinion at the
22 time -- it was working as it should do, and there
23 wouldn't have been any integrity issues with the data
24 between the branch and Horizon.
25 **Q.** Did you look at the data to see whether there were any
107

1 counter. If the error recurs this is indication of
2 a more serious fault either with the computers mother
3 board or the affected drive. Therefore, if the message
4 reappears then send an engineer to replace the part at
5 fault."
6 So you can see it continues. Then if we look at the
7 second KEL that's referred to, FUJ00059107, the one
8 ending in "pcarroll ... 9Z". "Problem" -- scroll down,
9 please:
10 "Corruption on message store. Likely to be a bad
11 disk ... or more likely Riposte has been subjected to
12 an interruption whilst an indexing operation has been
13 taking place; if a power outage occurs during this
14 process it is possible for a corruption of the data
15 structures within Riposte ..."
16 "Solution ...
17 "A reboot can fix some of these problems so that
18 should be tried in the first instance, if the events
19 occur out of hours then ClearDesk may clear the problem.
20 If they persist or re-occur and the [Post Office] are
21 having problems, then [do something]."
22 Then further down, about eight lines in:
23 "MULTI-COUNTER SITE -- SMC must check all counters
24 are working okay, apart from target counter, there must
25 be at least one other unit with a fully functioning
106

1 integrity issues?
2 **A.** At the data?
3 **Q.** Yes.
4 **A.** No.
5 **MR BEER:** Thank you.
6 Sir, that would be an appropriate moment for lunch,
7 if it is acceptable to you. I wonder whether we could
8 break until 2.10.
9 **SIR WYN WILLIAMS:** Yes, certainly.
10 **MR BEER:** Thank you very much.
11 (1.19 pm)
12 (The Short Adjournment)
13 (2.10 pm)
14 **MR BEER:** Good afternoon, sir. Can you see and hear us?
15 **SIR WYN WILLIAMS:** Yes, thank you.
16 **MR BEER:** Good afternoon, Mr Dunks.
17 Can we move on from looking at the themes we looked
18 at this morning to looking at a couple of particular
19 prosecution cases that we've already dipped into this
20 morning, those of Jerry Hosi and Seema Misra, in
21 slightly more detail. Can we look, please, to begin
22 with at FUJ00083703. Can we see this is a witness
23 statement by you, dated 3 June 2008. If we scroll down
24 a little bit, please, and a little bit further, and then
25 go over the page. We can see about five or six lines
108

1 in, you say:
 2 "I have been asked to provide details on the calls
 3 for advice and guidance ... at Porters Avenue",
 4 ie Mr Hosi's branch.
 5 So this is a Jerry Hosi, Porters Avenue witness
 6 statement; do you see that?
 7 **A.** Yes.
 8 **Q.** As we have seen you say:
 9 "I have reviewed the HSH calls [during the period
 10 there set out] there were 33 calls from the branch to
 11 HSH and all of the calls are of a routine nature and do
 12 not fall outside the normal working parameters of the
 13 system. And in my opinion would have had no affect on
 14 any counter discrepancies."
 15 If we just go back to page 1, please, and scroll
 16 down to some of the boilerplate paragraphs. Can you see
 17 the second one, you say:
 18 "I make this witness statement from facts within my
 19 own knowledge unless otherwise stated."
 20 There is then something about records. You say,
 21 four lines from the bottom, you have access to the
 22 records, you weren't involved in any of the technical
 23 aspects and you say, "This area is not my particular
 24 area of expertise", and you make the witness statement
 25 simply to clarify the call logs for the benefit of the
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1 or Post Office would request things to be taken out and
 2 put in under discussion, so most of the time it would
 3 have been a compromise -- I say a compromise -- under
 4 discussion of what was put in and taken out. I can't
 5 recall what the process was or what discussions were or
 6 reasons why that was left out.
 7 **Q.** Okay. The first line of that paragraph, which is
 8 included, "I make this witness statement from facts
 9 within my own knowledge unless otherwise stated", what
 10 did you understand that to mean?
 11 **A.** I think I said earlier that that's within my own
 12 knowledge. I mean, "otherwise stated" -- I know you
 13 said that I hadn't stated that I spoke to the SSC, but
 14 I believe that I knew those facts or those -- the
 15 knowledge was within my arena or I knew when I made the
 16 statement.
 17 **Q.** Can you not see that, in order to make a witness
 18 statement that includes that line "from facts within my
 19 own knowledge", there could never be a case where you
 20 would include the words "unless otherwise stated"?
 21 **A.** Sorry, say again?
 22 **Q.** Yes, in order for you to make a witness statement about
 23 something, the something has to be within your own
 24 knowledge, otherwise you wouldn't be able to write it
 25 down, would you?

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1 court.
 2 Do you see there that the boilerplate paragraph Q,
 3 in the policy documents we looked at this morning, the
 4 one that says, "There is no reason to believe that the
 5 information contained in this statement is inaccurate
 6 because of improper use of the computer", et cetera,
 7 isn't present in this witness statement?
 8 **A.** Correct.
 9 **Q.** It's not present if we look elsewhere in the witness
 10 statement either?
 11 I think I put this morning that we see that
 12 boilerplate paragraph in all of your witness statements,
 13 and I think you agreed with me, and I was asking you
 14 where you got it from and why you included it in all
 15 witness statements. I think it's right that it's in all
 16 of the witness statements that address extraction and
 17 explanation of ARQ data but not in witness statements
 18 that address extraction and explanation of HSH call
 19 logs. Why is that?
 20 **A.** I don't know why that form of the witness statement
 21 didn't include that.
 22 **Q.** So why was it included in the ARQ statements but not the
 23 HSH statements?
 24 **A.** I don't know why the two were different. They were --
 25 the statements weren't fixed because I could add things,
 110

1 **A.** Correct.
 2 **Q.** Given that is the case, what is the purpose of that
 3 line? If everything is always going to be within your
 4 knowledge, on your account, to put it in a witness
 5 statement, what's the purpose of that line?
 6 **A.** I don't know, to be honest with you, that's part of the
 7 standard witness statement, I said before, that we were
 8 told to use.
 9 **Q.** Did you not understand it to mean that, "If I don't say
 10 anything, the things I'm speaking about are in fact
 11 within my own knowledge, but if I identify in the
 12 witness statement things that I've learnt from somebody
 13 else, I'll say so" --
 14 **A.** No, I --
 15 **Q.** -- ie unless otherwise stated?
 16 **A.** No, that was never my understanding at the time.
 17 **Q.** Did you in fact have an understanding or did you just
 18 include this because it was another one of the
 19 boilerplate paragraphs?
 20 **A.** No. Sorry, no, I had an understanding. I believed it
 21 was within my knowledge base at the time of writing the
 22 statement.
 23 **Q.** Okay, if that's the case, when could you ever otherwise
 24 state?
 25 **A.** I don't know.

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1 Q. On your explanation, that statement makes no sense, does
 2 it? If everything is within your knowledge because
 3 you've been told about it, you could never state
 4 otherwise?
 5 A. You could read it that way, yes but these are statements
 6 which were written and agreed to be used.
 7 Q. Can we go back to page 2, please, and look at the second
 8 paragraph down:
 9 "I have reviewed the HSH calls ... there are 33 ...
 10 all of the calls are of a routine nature and do not fall
 11 outside the normal working parameters of the system.
 12 And in my opinion would have had no affect on any
 13 counter discrepancies."
 14 If you had no technical expertise in Horizon, what
 15 qualified you to make that statement?
 16 A. I'm being asked my opinion and, based on the knowledge
 17 that I had at the time, that I am making that statement
 18 based on my opinion at the time, and that's -- that's
 19 what it says.
 20 Q. Can we move on, please, to FUJ00083704. This appears to
 21 be substantially the same statement, dated two days
 22 later, 5 June 2008. If we go to the second page and
 23 look at the second paragraph, that appears to be exactly
 24 the same, except that, in the previous edition, 3 June,
 25 the last sentence of the second paragraph said "would
 113

1 A. Because I'm aware or was under the opinion that, if
 2 a call was passed to the NBSC for a business issue or
 3 user guide -- or user error, that it was resolved to
 4 a satisfactory resolution and --
 5 Q. Satisfactory to who?
 6 A. To all parties.
 7 Q. So the postmasters were always happy, were they, in your
 8 opinion, when things got referred to the NBSC?
 9 A. I have to believe that, yes.
 10 Q. Where did you get that information from, the postmasters
 11 were always happy when they got referred to the NBSC?
 12 A. Well, we never saw the call come back, so I have to make
 13 an assumption that the calls were resolved.
 14 Q. Is that the foundation on which you built your evidence
 15 to a criminal court: assumption?
 16 A. That the calls had been resolved, yes.
 17 Q. You didn't know one way or the other, did you?
 18 A. That the -- it was a Helpdesk to deal with those issues,
 19 yes.
 20 Q. But I think you told us in the morning session that you
 21 had no access to NBSC records and didn't know what
 22 happened once a case had been referred to the NBSC?
 23 A. Mm-hm, yes.
 24 Q. So why did you write a witness statement including
 25 reference to this call -- and there are lots and lots of
 115

1 have had no effect", E-F-F-E-C-T, and now that's been
 2 changed to "affect", A-F-F-E-C-T; can you see that?
 3 A. Yes.
 4 Q. So the overall opinion is still included in this
 5 version, correct?
 6 A. Correct.
 7 Q. Can we look at the substantive comments that you make
 8 about the calls and look at page 3, please, and look at
 9 call number 3. Thursday, 10 November 2005, a call
 10 ending in 152:
 11 "New call taken ... [postmaster] is not in the right
 12 CA (Cash Account) period and has not rolled over this
 13 morning."
 14 "Resolution" over the page: referred to NBSC; call
 15 closed."
 16 So there was a report that the subpostmaster had
 17 a problem with his cash account, yes --
 18 A. Yes.
 19 Q. -- and that's passed to the NBSC?
 20 A. Yes.
 21 Q. You said that what is reported there would have had no
 22 affect on any counter discrepancies. This was the
 23 system operating as intended and does not fall outside
 24 the normal working parameters of the system. How were
 25 you able to say that?
 114

1 these, let me tell you, that are referred to the NBSC --
 2 saying that this was of a routine nature, it doesn't
 3 fall outside the normal parameters of the system and
 4 wouldn't have had an effect on any counter
 5 discrepancies; how can you say that?
 6 A. Because if it's passed to the NBSC, it was a business
 7 issue.
 8 Q. Firstly, do you agree that involves a significant
 9 assumption, that the person in the HSH has rightly
 10 categorised it as a business issue?
 11 A. The first part of call, yes.
 12 Q. That it involves an assumption by you that the HSH
 13 person has got it right?
 14 A. Correct.
 15 Q. Even if the postmaster was saying it's a system issue,
 16 you took from the fact that it was in fact passed to the
 17 NBSC that it was a business or user issue?
 18 A. Yes, because if it was then thought to be -- or needed
 19 further investigation to see if it was a technical
 20 issue, or software issue, that call would have been
 21 passed back to Horizon to investigate it.
 22 Q. Are you therefore making the second assumption that,
 23 because the call was not passed back to HSH by NBSC,
 24 that it must have been a business or user issue?
 25 A. Yes.
 116

1 Q. Can we look, please, at call number 8 on page 5, thank
 2 you. If we scroll down, 5 January, ending in 008:
 3 "New call ... Critical event ... 'An unexpected
 4 error occurred whilst attempting to insert a message.
 5 Timeout occurred waiting for lock ...
 6 "Outcome
 7 "An automatic error was picked up by the SMC ...
 8 a call was logged. The SMC referred to [Known Error
 9 Log]", and it's the JSimpkins338Q one.
 10 "The KEL recommends a remote counter reboot which
 11 fixed the problem and no further events were seen."
 12 If we carry on and look at 9 and then over the page
 13 to 10, please, and then down to Number 10 and then
 14 quickly read 11, screen freeze:
 15 "[Postmaster] contacted the Helpdesk as the screen
 16 had frozen ... advised to reboot ... then continued to
 17 operate as normal."
 18 12, over the page, please.
 19 13, barcode reader not working.
 20 14, barcode reader not working.
 21 15, keyboard not accepting swipe cards.
 22 16, PIN pad not working.
 23 Over the page, 17, flooding and rewiring needed.
 24 18, more flooding.
 25 19, no online services.

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1 were back working again.
 2 Q. Did the calls record how long the call handler waited to
 3 review whether there were any problems, ie whether
 4 further issues were seen?
 5 A. I'm not sure. I don't know.
 6 Q. Do the call records record whether there was any later
 7 impact on balancing of the NT events which occurred,
 8 irrespective of the system being back up and running and
 9 stable, whether it had an impact on balancing; do the
 10 call records record that?
 11 A. Well, it doesn't -- no, it doesn't state that, no.
 12 Q. So you wouldn't know one way or the other?
 13 A. Well, if there were no calls or -- raised about that
 14 issue, I don't know how long they looked at the events.
 15 Q. So are you saying that because the subpostmaster didn't
 16 call back in and say, "I've got an existing or
 17 continuing balancing problem", you assumed that there
 18 had been a solution --
 19 A. Um --
 20 Q. -- that had been effective?
 21 A. Well, yes, I mean the fault had been fixed at that time,
 22 so yes, I do.
 23 Q. Do you know what the NBSC habitually advised the
 24 subpostmasters as to their responsibility for settling
 25 discrepancies, irrespective of the cause of them?

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1 Then 20, please, if we come to 20:
 2 "Critical NT_Error occurred ... remote procedure
 3 call failed ...
 4 "An automatic error event was picked up by the SMC
 5 ... a call was logged. The SMC referred to ...
 6 MWright1245K. The KEL recommends a remote counter
 7 reboot which fixed the problem and no further events
 8 were seen. This was due to the KMRX service ... failing
 9 to respond."
 10 If we go forward, please, to page 13 and scroll
 11 down, you say in relation to those two that I've
 12 highlighted, the calls ending 970, and 008:
 13 "The term 'critical' is the comparative level of
 14 attention required", et cetera.
 15 Reading on:
 16 "These critical events occurred outside the post
 17 office opening times and a standard action of a reboot
 18 ... was undertaken and repaired the problem and
 19 confirmed stability of the system ... this is not my
 20 particular area of expertise. I have a general
 21 knowledge of the procedures and have made comments to
 22 aid the court."
 23 How would a reboot confirm the stability of the
 24 system?
 25 A. Confirmed that -- well, it confirmed that the counters

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1 A. I had no knowledge of that, no.
 2 Q. When you compiled summaries like this, would you
 3 habitually interrogate the KELs?
 4 A. Yes, I would have looked at KELs. I'd have looked at
 5 anything available.
 6 Q. Why would you look for the KELs?
 7 A. Because it's mentioned in the call logs, within the
 8 details of the call.
 9 Q. Do you ever set out what the KEL says in your witness
 10 statements, concerning HSH?
 11 A. No. I don't believe I did no.
 12 Q. Did you ever find anything relevant in the KELs then?
 13 A. I can't remember.
 14 Q. If you had have found something relevant in a KEL, would
 15 you have included it in the witness statement?
 16 A. I don't know. I was trying to give an overview -- as my
 17 statement says an overview of the call, of what -- it
 18 was opened, what was happened and what the outcome was.
 19 Q. Did you have firsthand technical knowledge that would
 20 enable you to dissect or to understand the impact of any
 21 particular critical error or the implications of
 22 a reboot?
 23 A. As I said, no but, at the time, by the time I'd done my
 24 work and written the witness statement, I believe
 25 I understood and had a better picture, and understood

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1 that.

2 **Q.** Did you ask anyone else within Fujitsu about the KELs
3 referred to in these call logs?

4 **A.** If I didn't understand them, yes, I would have done.
5 I'd have spoken to whoever -- well, the SSC someone
6 within the SSC. Someone who had better technical
7 knowledge than I did at the time.

8 **Q.** The Inquiry has heard evidence for example, about the
9 Riposte lock problem and the Callendar Square problem,
10 and has heard evidence about problems arising because
11 counters were told reboot the system, or were rebooting
12 the system in the face of errors that were in fact
13 unresolved; do you know about any of that?

14 **A.** No, I wasn't aware of -- you mention the Callendar
15 Square -- no, I wasn't aware of that particular problem.

16 **Q.** So you weren't told by anyone in the SSC that the act of
17 being told to reboot a system in the face of a critical
18 NT error might itself be the cause of yet further
19 problems?

20 **A.** I don't believe that was ever mentioned, otherwise
21 I would have known about a bug or an issue that may have
22 caused some of these problems. No, I don't believe
23 I did.

24 **Q.** So we've seen that the call log mentioned the
25 JSimpkins338Q KEL, yes; we saw that earlier?

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1 the morning. If the event is seen at a multi-counter to
2 is during the working hours of the [post office], or up
3 to 6.00 on a weekday (in case they are balancing out of
4 hours), RING THE OFFICE AND GET THEM TO REBOOT the
5 eventing counter. If they are in the process of
6 balancing, it is strongly advised that they reboot
7 before continuing with balancing as they are at risk of
8 producing an incorrect balance. Warn the [postmaster]
9 that if transactions appear to be missing, they should
10 not be reentered -- they will become visible after the
11 counter has been rebooted. If a reboot/ClearDesk does
12 not resolve the problem, send the call over for further
13 investigation -- SSC can rebuild the messagestore on the
14 affected counter ... If the message was seen on
15 a Correspondence server and the source of the message is
16 Riposte then raise a PEAK call and route it to SSC to
17 stop and restart the Riposte under Operational Change
18 Procedure. If the errors are seen on more than one
19 Correspondence server at the same time then further
20 investigations should be carried out."

21 There is nothing in your witness statement, in
22 particular your summary of the call logs, that
23 acknowledges that an imbalance could result from this
24 event, is there?

25 **A.** No, there isn't, no.

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1 **A.** Yes.

2 **Q.** You said you would have gone off and looked at that?

3 **A.** I believe I would have done, yes.

4 **Q.** Can we look, please, at the JSimpkins KEL. FUJ00083720.
5 It's quite a short KEL, restricted to a page.

6 "Problem":

7 "The events started ... on 1 May after the counter
8 was rebooted. The counter produced one of these
9 messages every 10 seconds throughout the night until
10 ClearDesk restarted Riposte ... This cleared the lock
11 and the system has been fine since. We are seeing a few
12 of these each week, on Wednesdays during balancing.
13 This can lead to problems if the [postmaster] is
14 balancing on the counter creating events, as it may not
15 have a full view of transactions done on other counters
16 ... This event can also give rise to Transfer problems,
17 where the eventing Node was not replicated and so
18 allowed Clerk to Transfer In of a [transaction] which
19 had already been TI on another Node for the second time
20 ... This problem is still occurring every week, in one
21 case on the same site on 2 consecutive weeks ... Sent to
22 development."

23 Then "Solution":

24 "This problem seems to be cleared by either
25 rebooting the effective counter or ClearDesk running in

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1 **Q.** Or that this is something that had been happening for
2 years, since at least May 2002, is there?

3 **A.** But it's seen as a -- I see that as part of the routine
4 handling of calls, and it's a known error that's
5 being -- and has got a resolution to it and how to deal
6 with that type of call.

7 **Q.** How could you tell which of the multiple different
8 resolutions in the solution applied in this case?

9 **A.** On this one, "If the event is seen as ... during working
10 hours", I don't believe this one was during working
11 hours the call was raised. So that would have been my
12 first port of call.

13 **Q.** I'm thinking, for example, "If reboot does not resolve
14 the problem, send the call over for further information.
15 SSC can rebuild the message store"?

16 **A.** Yes.

17 **Q.** "If the message was seen on the Correspondence server
18 then raise a PEAK call, route it to SSC. If the errors
19 are seen on more than one correspondence server ..."

20 What you don't seem to have done, is this right,
21 Mr Dunks, is looked at the possible different
22 manifestations of this problem and seen which applied in
23 this branch on this occasion.

24 **A.** I can't remember how -- what I can see is there's a set
25 of instructions to check and what the resolution was

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1 each time. I can't remember what I did and how
 2 I balanced the two up, but "... if the event is seen
 3 during working hours". I believe this one wasn't during
 4 working hours.
 5 Q. It was at 01.15, I think.
 6 A. In the morning? Yes.
 7 Q. In the morning.
 8 A. So it's an automated event being picked up by the SMC.
 9 Q. That's the first part of the solution. I'm looking at
 10 the later parts of the solution?
 11 A. Yes, but there's a resolution for each step. I can't
 12 remember what -- how far it got, or what the -- that
 13 type -- those steps were and, like I say, how I balanced
 14 that up to come to my solution but --
 15 Q. Putting it frankly, Mr Dunks, did you carry out
 16 an investigation, come to a resolution, balance things
 17 up, or did you cut and paste extracts from call logs and
 18 add a generalised opinion in each and every one of these
 19 Horizon Helpdesk witness statements?
 20 A. No, not at all. That wasn't my way of working.
 21 Q. You carried out proper investigations --
 22 A. Yes.
 23 Q. -- in every case to see whether there was any
 24 possibility of an effect on balancing for all of the
 25 multiple calls in question, did you?

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1 please, FUJ00083683, and put alongside it the June 2008
 2 one, FUJ00083703. Thank you.
 3 So the witness statement on the right in Mr Hosi's
 4 case, 24 July 2007, which I believe is the witness
 5 statement that Lisa Allen was referring to, and then the
 6 revised witness statement of 3 June, the date of the
 7 email on the left-hand side. Can we go to page 2 on
 8 each statement, please, and look at the second paragraph
 9 on each statement. Thank you. You see on the
 10 right-hand side, the July '07 witness statement is three
 11 lines long:

12 "I have reviewed the calls ... [they were all] of
 13 a routine nature and do not fall outside the normal
 14 working parameters of system".

15 Then the 3 June witness statement, on the left-hand
 16 side adds:

17 "And in my opinion, would have had no affect *[sic]*
 18 on any counter discrepancies."

19 Can you see that's been added?

20 A. Yes.

21 Q. So, in short, Ms Allen has asked you to provide a new
 22 witness statement that adds in a line that, in your
 23 opinion it would have had no effect on any counter
 24 discrepancy and, within an hour, you do so. Correct?

25 A. On that email, yes. But I think the email states "As

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1 A. And to give my opinion, I had to do that to satisfy
 2 myself that I was happy to put that statement down in
 3 a witness statement, yes.
 4 Q. That's a lot of work in each case, isn't it?
 5 A. Absolutely, yes.
 6 Q. Hours and hours?
 7 A. It could be, yes.
 8 Q. Can we look, please, at FUJ00083702. You remember this
 9 email, 3 June 2008; can you see that?
 10 A. Yes.
 11 Q. The bottom email, in fact, 9.29, in which Lisa Allen
 12 asks you to provide another statement, including the
 13 outcome of faults reported and that it would have had no
 14 effect on counter discrepancy; can you see that?
 15 A. Yes.
 16 Q. So she's asking you to provide a new statement with
 17 a phrase "This had no effect on counter discrepancy"
 18 added, yes?
 19 A. Yes.
 20 Q. Can you see that you appear to have replied -- the date
 21 has been Americanised -- on the 3 June at 10.23?
 22 A. Yes.
 23 Q. Can you see that?
 24 A. Yes.
 25 Q. Can we look at an early draft of your witness statement,

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1 discussed". So you're trying to say that there wasn't
 2 a lot of time in between the two. I think a lot of the
 3 time any changes that needed or were requested would
 4 have been via an email or had to have an email, as
 5 a form of audit trail. So we'd have discussed this
 6 already, so I'd probably have done that work previously
 7 on that.

8 Q. You replied within an hour with a revised statement,
 9 adding the words "in my opinion, the calls would have
 10 had no affect on any counter discrepancies" or the
 11 matters mentioned in the calls --

12 A. Yeah.

13 Q. -- "would have had no effect on any counter
 14 discrepancies". Was that an opinion you formed quickly
 15 and with ease?

16 A. It wouldn't have been quickly, no. That's something
 17 that would have been discussed previously and it says
 18 discussed in the email. It's something we would have
 19 spoken about and I don't know when that discussion took
 20 place. So I'd have already done the work and she was
 21 just confirming what she'd requested.

22 Q. You remember that, do you?

23 A. No, I don't remember the jumping around and what -- how
 24 the sequences worked but any changes would have been
 25 discussed and agreed before they were put in.

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1 Q. What additional work would you have had to carry out in
 2 relation to the 33 calls logged from Porters Avenue to
 3 form the opinion that none of them would have had any
 4 effect on counter discrepancies?
 5 A. I can't remember the work I put in. I mean, looking at
 6 that, again, I see that as a further to, to describe
 7 that the system was -- well, the counters and everything
 8 that I -- was working as expected. And it's a further
 9 explanation to that.
 10 Q. It's an additional point, isn't it, it's rather more
 11 than saying that the calls themselves are of a routine
 12 nature. I mean, something can be very serious --
 13 A. Sorry?
 14 Q. Something can be very serious but be of a routine nature
 15 because it happens frequently, can't it?
 16 A. Sorry, say that again?
 17 Q. Something can be very serious but can be of a routine
 18 nature because it happens frequently?
 19 A. Yes, well, I think so, yes. Yes.
 20 Q. You say that they do not fall outside the normal working
 21 parameters of the system. That itself does not say,
 22 does it, whether the subject matter of the calls caused
 23 counter discrepancies, does it?
 24 A. I'm sorry can you repeat the question?
 25 Q. Yes, it's saying that the subject matter of these

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1 Avenue. The top email, the date has again been
 2 Americanised, I think, printed as 5 June, in fact 6 May.
 3 If we look at the bottom email first, 6 May:
 4 "... please provide me with a further statement
 5 exhibiting the 33 calls logged and can you send a copy
 6 of the exhibit with a ... label. I apologise for the
 7 short notice ...
 8 "There's a mention at court tomorrow ..."
 9 Can you see that?
 10 A. Yes.
 11 Q. Then, at the top of the page, again, you reply quite
 12 quickly, 11.07 through to 12.41:
 13 "Let me know if this is okay."
 14 Can you see that?
 15 A. Yes.
 16 Q. When you produced that statement, did you go back and
 17 look at the KELs?
 18 A. I think that is a request -- "As discussed, can you
 19 please provide me with a further statement exhibit ring
 20 those 33 calls". I think that was to supply the full
 21 call details.
 22 Q. Okay, so this is a bit like in Misra, where you started
 23 off with a summary, and then were asked to produce
 24 a witness statement simply exhibiting the calls, the
 25 call logs?

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1 33 calls does not fall outside the normal working
 2 parameters of the system?
 3 A. Mm-hm.
 4 Q. It does not say one way or the other whether the subject
 5 matter of the calls had any effect on counter
 6 discrepancies?
 7 A. That would have been my opinion at the time, if asked.
 8 It's trying to describe that the system was working as
 9 expected.
 10 Q. But what you've added is an opinion that the subject
 11 matter of the calls would, in fact have had no effect on
 12 counter discrepancies. So it's a material addition,
 13 isn't it?
 14 A. Yes.
 15 Q. Can we go back to the email, FUJ00083702. You're
 16 referring in the bottom message to the "As discussed"?
 17 A. Yes.
 18 Q. So are you telling us that the subject matter of the
 19 entirety of that bottom email had been discussed, you
 20 had carried out the work before the email of 3 June had
 21 been received and that's why you were able to turn it
 22 around so quickly on that Tuesday morning?
 23 A. I would like to think so, yes.
 24 Q. Can we move forwards, please, to FUJ00083729. We're now
 25 in 2010 -- 6 May 2010 -- still concerning Porters

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1 A. It appears to be that type of thing, yes.
 2 Q. So you wouldn't have to conduct any extra analysis, is
 3 that right, in order simply to exhibit?
 4 A. If I'm just supplying the call data, no.
 5 Q. Thank you. Can we move on, please, to look at Seema
 6 Misra's case. That can come down, thank you.
 7 You made, I think, three witness statements in the
 8 case of Seema Misra. Can we look at one of them,
 9 please, the one dated 29 January 2010. POL00058448.
 10 It's obviously a rogue reference. It's attaching
 11 a witness statement by email, dated 29 January 2010,
 12 from Mr Longman to Phil Taylor in the Post Office and
 13 two lawyers -- one solicitor, one counsel -- attaching
 14 your witness statement, "which deals with all the
 15 Helpline calls regarding the Horizon system", and asking
 16 for it to be served on the defence.
 17 Can we look at what happened after that, please.
 18 FUJ00152990. This is an email exchange between Anne
 19 Chambers and Gareth Jenkins and, just staying on the top
 20 part of it first, we can see that this email exchange is
 21 sent to you by Penny Thomas. Okay?
 22 A. Yes.
 23 Q. If we scroll down, please, to page 2, and scroll on
 24 a little further. Thank you. So this is 25 January,
 25 after you'd signed off your first witness statement --

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1 Sorry, 25 February, after you'd signed off your
 2 first witness statement at the ending of January. It's
 3 about witness statement support for West Byfleet and
 4 Ms Chambers says to Mr Jenkins:
 5 "... sending just to you initially.
 6 "... my involvement has always been unofficial and
 7 on the basis that I had time to do it. If I need to do
 8 more detailed analysis on this (and I'm not sure what
 9 I would be able to find, without knowing what their
 10 specific problem was) it will have to be agreed
 11 officially with my manager ... I don't think I can keep
 12 volunteering.
 13 "There are several entries on the 1 SYSMAN2 tab
 14 which require some further investigation. I've added
 15 some highlighting.
 16 "Counter 1 [the dates in May '06 and February '08]
 17 I don't know whether the counter was replaced, or
 18 whether the message store was deleted. The PowerHelp/
 19 TfS calls may illuminate this.
 20 "I don't know if the counter was used whilst these
 21 errors were occurring -- it may have been. If they have
 22 complaints specific to these [items], perhaps they
 23 should be checked out???
 24 "There are some isolated timeout waiting for lock
 25 messages, but in general these appear to be associated
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1 against the calls in your witness statement."
 2 Did you do so?
 3 A. I'd like to think I did. I wouldn't have just ignored
 4 that email.
 5 Q. You tell us in your witness statement, I'm not going to
 6 turn it up, paragraph 204 on page 61: "I've no
 7 recollection of this email or what precisely I did in
 8 relation to it."
 9 Does that remain the case? You don't know whether
 10 you did anything as a result of --
 11 A. No, I can't remember what I did.
 12 Q. Can you remember whether you did anything?
 13 A. Again, it's that long ago, I can't remember what I did.
 14 I'd like to think I didn't ignore that, so I would have
 15 done something but I can't remember.
 16 Q. You say, in your witness statement:
 17 "I would have satisfied myself at the time that the
 18 system events did not affect the integrity of data."
 19 What did you do to satisfy yourself that the system
 20 events did not affect the integrity of the data?
 21 A. Again, based around what I learned from my
 22 investigations.
 23 Q. A bit more specific than that, Mr Dunks?
 24 A. Well, I don't know. I can't remember what I did.
 25 Q. What could you have done, in the light of the three
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1 with checksums being written. To be on the safe side,
 2 it could be checked whether anyone was logged on [on
 3 certain dates and times by reference to those two
 4 counters].
 5 "It is notable that the branch does not have the
 6 repeated lock messages which were a feature of the
 7 Callendar Square problem."
 8 Over the page:
 9 "... as far as I know [that error message] hasn't
 10 been investigated but ... no one has complained of
 11 a problem linked to it. I'll try to check it out."
 12 If we scroll up, please, and keep going, Gareth
 13 Jenkins says:
 14 "Anne has looked at the events logs.
 15 "She's identified number of things below to check
 16 out.
 17 "Are you able to check out the specific times she
 18 has indicated, firstly to see if anyone was Logged on
 19 and secondly against Andy Dunk's call logs."
 20 Then up the page, Penny says to you:
 21 "I requested the events to be checked to support
 22 your witness statement; I've had a chat with Gareth this
 23 morning and as no transaction date has been requested,
 24 it is pointless going further ...
 25 "However, you might like to check Anne's comments
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1 suggestions that Anne Chambers was making, to satisfy
 2 yourself that the system events did not affect the
 3 integrity of the data?
 4 A. Well, the system events are the ones that are picked up
 5 by the SMC. So I would have looked at those -- those
 6 calls. I'd like to think I did.
 7 Q. Did you understand what she was referring to or what she
 8 would have been looking for in PowerHelp?
 9 A. Sorry, whereabouts? No, I can't remember what -- as
 10 I said, I can't remember the details of this specific --
 11 Q. Did you have access to PowerHelp?
 12 A. Yes, I did.
 13 Q. Do you understand what she would have been looking for
 14 in order to look in TfS call records?
 15 A. Well, PowerHelp and TfS were different versions of the
 16 Helpdesk calls.
 17 Q. You don't record in your witness statements that
 18 followed this that you did anything in particular in
 19 your subsequent witness statements in the Seema Misra
 20 case?
 21 A. No, because I -- no, I didn't, no.
 22 Q. And why not?
 23 A. Well, what investigations took place? No, I didn't,
 24 because I was looking at the calls as a whole.
 25 Q. But here you had somebody from SSC, who you've told us
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1 earlier that you relied on as a technical expert,
 2 suggesting that three things need to be done.
 3 **A.** Yeah.
 4 **Q.** So this isn't one of those conversations over the phone
 5 or where you went up to the sixth floor and we've got no
 6 record of it. This is one of those occasions where we
 7 have got a record of what the person in the SSC said
 8 needs to be done and I'm asking, in your following
 9 witness statements, there is no record of you doing
 10 anything in response to Anne Chambers' suggestions; why
 11 is that?
 12 **A.** Well, I wouldn't have thought that it would have been --
 13 after I'd looked at these, if my opinion hadn't changed,
 14 after looking at these, there wouldn't have been any
 15 need to add that statement, as you're saying.
 16 **Q.** Is that the basis on which you operated consistently
 17 when working for Fujitsu, that if you investigate
 18 something but in your own mind it doesn't alter your
 19 opinion, there's no need to record that you had
 20 conducted that investigation, whether in a witness
 21 statement or otherwise?
 22 **A.** I don't think at any stage I was required or asked to
 23 put down what investigative work that I carried out.
 24 These were an overview of the calls and then I was asked
 25 for my opinion, based on that.

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1 an NBSC issue"?
 2 **A.** Looking at that now, I don't know, I would assume it's
 3 been passed to the NBSC and advised it's an NBSC issue.
 4 It's either passed to the NBSC or advised that -- for
 5 the user to speak to the NBSC.
 6 **Q.** But you reading this on its face without more, you'd say
 7 this is down to the postmaster and the way she operates
 8 her branch, nothing to do with the system?
 9 **A.** At that point in time, yes --
 10 **Q.** How can you tell that --
 11 **A.** -- because it has to be --
 12 **Q.** -- from that record?
 13 **A.** Sorry?
 14 **Q.** How can you tell that from that record: this is down to
 15 the postmaster or postmistress and the way she runs her
 16 branch; this doesn't indicate that there was anything
 17 wrong with the system; it was operating as intended?
 18 **A.** It's a business or a user issue. It has to be -- that
 19 has to be investigated first by the NBSC, because it
 20 looks like it's a balancing issue or advice -- for them
 21 to sort out or look into or offer advice and guidance.
 22 **Q.** Okay, over the page, please. Then scroll down to the
 23 second call, 10.45, Seema Misra again, three minutes
 24 later:

"[Postmaster] states that showing £6,000 down from

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1 **Q.** Can we look, please, at the call records. POL00061793.
 2 These are the call records that you exhibited. Can we
 3 look at page 22, please, and we should see an entry --
 4 if we scroll down, please, thank you, and a bit
 5 further -- an entry of 20 February -- can you see
 6 that --
 7 **A.** Yes.
 8 **Q.** -- 2006, Mrs Misra, the postmaster saying, under "Call
 9 problem":
 10 "[Postmaster] states that she is showing £6,000 down
 11 from balance."
 12 Yes?
 13 **A.** Yes.
 14 **Q.** Then the call was closed within two minutes of it being
 15 opened. The call handler said it's an NBSC issue; can
 16 you see that?
 17 **A.** Yes.
 18 **Q.** So, in your world, this is good evidence that this is
 19 nothing to do with the system, it's a business or user
 20 error?
 21 **A.** At first, to be investigated, yes.
 22 **Q.** Well, where does it say it's to be investigated?
 23 **A.** Well, it's being -- it's passed for the NBSC for them to
 24 look into and deal with that issue.
 25 **Q.** Is it passed to the NBSC or is Mrs Misra told "This is

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1 balance. Advised NBSC issue. [Postmaster] stated she
 2 was talking to the NBSC and got cut off."
 3 Then under "Call closure":
 4 "I advised [postmaster] I would put her through
 5 [postmaster] was happy with this."
 6 Then scroll down, and over the page, 3.40 the same
 7 day, Seema Misra calling:
 8 "[Postmaster] stating in that her system is showing
 9 different values for certain products."
 10 Then this one says, "Postmaster transferred", scroll
 11 down a little bit -- again, within two minutes.
 12 Then next call, please. Next day:
 13 "[Postmaster] states that the last couple of weeks
 14 they have had problems with the Horizon kit and it is
 15 always showing they're down in money."
 16 Over the page, "Call closed":
 17 "She has been advised by the NBSC, advised
 18 [postmaster] to follow this, [reference] offered."
 19 Then scroll down, 23 February:
 20 "[Postmaster] states that she has losses every week
 21 in two stock units.
 22 "Call closed ... advised that the NBSC take a 2nd
 23 look as [the] stock units appear to be in a mess."
 24 Over the page. Keep going, please. Then Anne
 25 Chambers gets a hold of it. Just stop there.

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1 So a postmistress repeatedly calling in to the
 2 Helpdesk, being directed to the NBSC and, on the basis
 3 of those call records, you say this is the system
 4 operating as intended, this is all routine, and this is
 5 down to the postmistress not the system. Correct?
 6 **A.** If it's passed to the NBSC to be investigated, yes.
 7 **Q.** Can we look at page 26, please, and this is the third
 8 entry:
 9 "NBSC states that on the CC stock unit postmasters
 10 rolled over with a £1,500 loss. JSA stock unit
 11 postmaster has rolled over with a £200 loss. NBSC
 12 states that on 18 February postmaster declared her cash
 13 and she has a £900 loss up until Saturday and then when
 14 the postmaster declared her overnight cash on Saturday
 15 at 1.00 pm, went back to £200 loss. NBSC also states
 16 that her AA stock unit has a £6,000 loss. Postmaster
 17 has rolled this over as well."
 18 Then if we scroll down, please, and then scroll over
 19 and keep going:
 20 "Anne Chambers says she has checked very carefully
 21 and can see no indication that the continuing
 22 discrepancies are due to a system problem."
 23 Then over the page, and just stop there. The last
 24 five lines, she says:
 25 "This may be to do with how the discrepancies have
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1 she has losses every week in two stock units.
 2 "Resolution: 3 March ...
 3 "Call closed ... [postmaster] was getting
 4 discrepancies, SSC have investigated and advised that
 5 the NBSC take a 2nd look as the office stock units
 6 appear to be in a mess.
 7 "Outcome
 8 "SSC ... advice that call be passed back to NBSC for
 9 further investigation."
 10 So that entire call you've summarised in this way.
 11 How were you able to say that this call was of a routine
 12 nature and the contents of the call would not affect the
 13 working order of the counter?
 14 **A.** Through -- well, again, through my investigation.
 15 I mean, the call -- I would have said routine nature,
 16 there were calls where postmasters had a discrepancy of
 17 some sort and they were investigated routinely, as they
 18 would be, and resolved. So these are routine calls.
 19 **Q.** Was everything that happened in the decades of you
 20 working for Fujitsu routine? Nothing ever happened out
 21 of the routine?
 22 **A.** I don't know but I'm basing this witness statement on my
 23 knowledge at the time that -- I'd seen numbers of these
 24 type of calls and they're dealt with routinely.
 25 **Q.** But what was the outcome; what happened?
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1 been accounted for. I do not really understand this ...
 2 I recommend that this call is passed back to NBSC Tier 2
 3 for further investigation, since there is no evidence
 4 that the discrepancies are being caused by a system
 5 problem. If you want the above information in an email,
 6 let me know."
 7 So when you were providing a witness statement
 8 saying that all of the calls are of a routine nature and
 9 do not fall outside the normal working parameters of the
 10 system, were you relying on the accuracy and truth of
 11 what's written, for example, here?
 12 **A.** I believe so. Well, not just the written word. I'd
 13 have probably spoken to somebody about what was going on
 14 there as I would do normally. But --
 15 **Q.** Who would you have spoken to?
 16 **A.** I could quite easily have spoken to Anne herself.
 17 I don't recall.
 18 **Q.** All of this entry here, leading up to this point, if we
 19 go to your witness statement, please, at POL00167135.
 20 This is your witness statement of 29 January 2010. Can
 21 we look, please, at page 8 and, if we scroll down,
 22 please, and a little further -- thank you -- that call
 23 that we've just looked at is number 29. You summarise
 24 that episode by saying:
 25 "Annetee NBSC -- [postmaster] states every week that
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1 **A.** Sorry?
 2 **Q.** What was the outcome?
 3 **A.** The NBSC investigated so I have to believe that the NBSC
 4 had resolved the issue.
 5 **Q.** How did you believe that the NBSC had resolved the
 6 issue?
 7 **A.** Because the call didn't come back to Fujitsu for further
 8 investigation.
 9 **Q.** What about if the NBSC were telling the postmasters,
 10 "We've taken it as far as we can go, it's now your job
 11 to pay up. You owe that £6,000. It says so in your
 12 contract"?
 13 **A.** I know nothing about that.
 14 **MR BEER:** No.
 15 Thank you very much, Mr Dunks. You've been very
 16 helpful indeed.
 17 Sir, those are the only questions that I ask. There
 18 are some questions from Core Participants. I wonder
 19 whether we might have a ten-minute break so that they
 20 can organise themselves.
 21 **SIR WYN WILLIAMS:** Yes, by all means. What time shall we
 22 resume?
 23 **MR BEER:** 3.25, I think, sir.
 24 **SIR WYN WILLIAMS:** Okay, fine.
 25 (3.13 pm)
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(A short break)

(3.25 pm)

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

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

MR BEER: Thank you very much, sir. There are two sets of questions from Core Participants: about 15 to 20 minutes from Ms Page and about five minutes or so from Mr Stein, in that order.

SIR WYN WILLIAMS: All right, fine.

Questioned by MS PAGE

MS PAGE: Mr Dunks, I ask questions on behalf of some of the subpostmasters in this Inquiry, including both Mr Castleton and Mrs Misra.

Mr Dunks, you were very loyal to Fujitsu, weren't you?

A. Loyal?

Q. You'd been with the business, man and boy, yes?

A. Man -- for, yes, almost 30 years, now, yes.

Q. You would do or say pretty much anything to protect the Fujitsu name; is that right?

A. No, that's not true.

Q. Let's have a look at FUJ00154750. This is an email chain that the Inquiry has seen before, between you and your boss, Peter Sewell, and it was before you were due

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integrity.

Q. Let's look at your reply, if we go up, please.

"Thank you for those very kind and encouraging words, I had to pause halfway through reading it to wipe away a small tear ...

"Bless you all.

"Andy."

What did that mean, Mr Dunks?

A. I got on very well with Pete at the time, Mr Sewell. He was trying to put me at ease, so I'm just saying thank you for that, I believe in their support.

Q. Are you honestly trying to suggest that that was a genuine reply, rather than an obviously sarcastic response?

A. Sorry, say that again?

Q. Well, are you suggesting that you really did have to pause halfway through reading that email to wipe away a small tear?

A. No.

Q. Is that what you're saying, Mr Dunks?

A. No.

Q. No. It was sarcasm, wasn't it, Mr Dunks?

A. It was between myself and Pete -- you say sarcasm, possibly. But that was -- yeah, there was no real bad intention about that. It was just the type of

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to give evidence against Lee Castleton. If we scroll down to Mr Sewell's email, thank you:

"See you in court then. Fetter Lane is where they used to hang people out to dry. I don't suppose that type of thing happens any more though.

"That Castleton is a nasty chap and will be out to rubbish the FJ name, it's up to you to maintain absolute strength and integrity no matter what the prosecution throw at you. WE will all be behind you, hoping you come through unscathed. Bless you."

You were going to be loyal to Fujitsu, weren't you, no matter what?

A. Mmm, that's not what that says, no.

Q. That's the culture; that's the mindset, isn't it, Mr Dunks?

A. No, I read that as trying to give me support and confidence to go in because I think that was the first time I was being called to court as a witness.

Q. The way that he chose to give you confidence was by describing the person whose trial it was as a "nasty chap"; do you see that?

A. I do, yes.

Q. He was going to be out to rubbish the Fujitsu name, and it was up to you to stop that, wasn't it, Mr Dunks?

A. No, it was up to me to be strong and deal with that with

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relationship Pete and I had at the time.

Q. The sort of relationship where you and your manager, in Litigation Support, joke about the fact that you're going to give evidence against a man whose future was on the line?

A. No, we weren't joking. No. I don't see that as that and I don't see that we were joking about what we were doing and, as you said, some -- a person's reputation and that, were on the line. That's not something to joke about. I don't read it as that. I can't remember how --

Q. Banter, isn't it, Mr Dunks?

A. It could have been.

Q. "They used to hang people out to dry. Oh, I don't suppose they do that sort of thing any more."

"Oh, I had to wipe away a small tear."

Banter, wasn't it?

A. Possibly it was, yes. It was trying to put me at ease because I knew what -- it was the first time.

Q. This was copied in to Penny Thomas and Neneh Lowther?

A. Yes.

Q. This was a team email; is that fair?

A. Yes.

Q. This was the culture you all worked in, wasn't it, deeply, deeply partisan? You were all there to make

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1 sure that the nasty postmasters did not rubbish the
 2 Fujitsu name. That's what your team was doing, wasn't
 3 it --
 4 A. No --
 5 Q. -- as led by the man you got along with very well,
 6 Mr Sewell?
 7 A. No, that wasn't the culture at all. I don't know why he
 8 used those words down the bottom. I've got no idea but
 9 it was more, as I said, trying to put me at ease, to try
 10 and relax and tell me that they'd got my support and my
 11 backing.
 12 Q. Thank you. Let's turn to Mrs Misra and an email that
 13 you were looking at with Mr Beer earlier on but which
 14 I'd like to ask some different questions on.
 15 FUJ00152990, please. This is the set of emails which
 16 were forwarded to you. They were originally between
 17 Anne Chambers and Gareth Jenkins, and they were
 18 forwarded to you, as we can see at the top there, by
 19 Penny Thomas.
 20 Now, if we just look at this top right-hand corner
 21 of the page, we see page 1 of 4. As we scroll down --
 22 oh, actually, before we scroll down we can see there
 23 that it's got Penny Thomas above the fact that it's from
 24 her. Do you see that in -- there we are, highlighted.
 25 It's got that line, and "Penny Thomas" above it, and
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1 you'd like to be sure of that. So it looks rather like,
 2 doesn't it, that Ms Thomas has printed out the email
 3 chain alongside your witness statement, claiming that
 4 all the calls were of a routine nature. Do you see
 5 that; do you accept that?
 6 A. That hasn't got her name on the top of this one so is
 7 that part of the printed --
 8 Q. No, that's -- it seems to be separate because the
 9 printed email seems to be pages 1 to 4 of this whole
 10 five-page bundle of documents. So it looks as if we've
 11 got a four-page email chain printed out and then,
 12 alongside that, your one-page witness statement. Do you
 13 see that? Does that make sense?
 14 A. No, it doesn't. If you've got pages 1 to 4, that hasn't
 15 got a number on that witness statement.
 16 Q. So that's right. So what I'm suggesting is it looks as
 17 if the four-page email chain has been printed out --
 18 A. Yes.
 19 Q. -- and filed with the one-page statement from you, or
 20 rather at least they've been put together and then
 21 scanned and provided to the Inquiry in that way?
 22 A. Okay, yes.
 23 Q. So your statement sits alongside the four pages of email
 24 chain.
 25 A. Okay.

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1 then "Page 1 of 4."
 2 As we look through the email, so as we scroll down
 3 to page 2, we see "Page 2 of 4", and then it continues
 4 "Page 3 of 4" and "Page 4 of 4".
 5 Now, would you agree that that suggests that Penny
 6 Thomas printed off that email chain? That's often the
 7 format we see, isn't it, when people print off an email
 8 and it comes out with their name at the top?
 9 A. To be honest with you, I don't know. If that's the
 10 format, I'll take your word for it. I'm not 100 per
 11 cent sure on that.
 12 Q. All right. Well, the final page that is part of this
 13 document is a short statement from you and, if we can go
 14 to that, please, page 5. So there we have "Page 4 of
 15 4", that's the email and then we have this witness
 16 statement from you, and it's really just that, it's that
 17 one liner, and it's dated and apparently signed, the
 18 signature has got the marker over it saying, "GRO" which
 19 means that it has been signed but it doesn't show.
 20 The statement really simply says:
 21 "Further to my statement dated 29 January 2010,
 22 I can confirm that all the calls mentioned from West
 23 Byfleet Post Office to the Horizon System Helpdesk are
 24 of a routine nature."
 25 That's all there is to it. We can scroll down if
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1 Q. On the one hand, your statement is saying that all the
 2 calls are of a routine nature, but the heart of the
 3 email chain is the Anne Chambers email in which, by
 4 contrast, she makes it absolutely clear that the calls
 5 required some technical investigation and some
 6 cross-checking to find out what lay behind them and
 7 whether they were indeed quotes "routine". Do you
 8 accept that?
 9 A. Can we go up --
 10 Q. It was read out to you earlier, we can go up to the
 11 email from Anne Chambers.
 12 A. Oh, yes, yes, I remember --
 13 Q. Yes?
 14 A. Mm-hm.
 15 Q. So she's basically saying that there needs to be further
 16 investigation into these calls?
 17 A. Yes.
 18 Q. Yeah? That's been filed alongside your statement saying
 19 "No, no, they're all routine", yeah? You're nodding so
 20 I'm taking that as a yes for the transcript.
 21 A. Yes, sorry. Yes.
 22 Q. Now, would you accept that when you were sent this email
 23 chain, it put a burden on you to check your witness
 24 statements and make sure that what you'd said in them
 25 was correct and not misleading?

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1 A. Well, that would have been my process throughout.
 2 Q. So when you received an email from Anne Chambers saying
 3 there's a whole number of technical things that need
 4 checking, you should have done that, shouldn't you,
 5 given that you had already signed a witness statement
 6 that claimed that these calls were all just routine?
 7 A. Well, yes, yeah. I would have done the work, yes.
 8 Q. So you say now, do you, that you did all the work that
 9 was set out in Anne Chambers' email here?
 10 A. I hope to think I did. I don't remember what that
 11 involved and what I did specifically.
 12 Q. Let's look at what she says needs to be done. She says,
 13 first of all, that "The PowerHelp/TfS calls may
 14 illuminate this". That's the middle of the page there.
 15 Then she says:
 16 "I don't know if the counter was used while these
 17 errors were occurring -- it may have been. If they have
 18 any complaints specific to these times, perhaps they
 19 should be checked out???"
 20 Are you saying that you did that?
 21 A. I'd like to think I did, yes.
 22 Q. At this time, there was no ARQ data. How would you have
 23 done it?
 24 A. Well, what do you mean at this time? No, this time
 25 I hadn't supplied the data. I'd have had the data to

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1 1010 -- as far as I know this hasn't been investigated,
 2 but on the other hand no one has complained of a problem
 3 linked to it. I'll try to check it out."
 4 What did you do about that?
 5 A. I can't remember what I did on that. I mean, that reads
 6 that Anne was going to try and check it out. I may have
 7 spoken to Anne, she may have spoken to me. I can't
 8 remember what took place.
 9 Q. Well, let's go up to the top of the email chain and
 10 remind ourselves of what took place:
 11 "I requested the events to be checked to support
 12 your witness statement; I've had a chat with Gareth this
 13 morning and as no transaction data has been requested
 14 it's pointless going further with this exercise.
 15 "... you may like to check Anne's comments against
 16 the calls in your witness statement."
 17 So all you had, Mr Dunks, was the call records, and
 18 you had nothing else. You could not check out what
 19 Mrs Chambers was saying needed to be checked out, could
 20 you? And yet you had provided a witness statement which
 21 claimed that all calls were routine.
 22 A. I can't remember how I came to that conclusion but
 23 I would have been happy at the time. I don't know how
 24 I came to that conclusion. The calls may -- maybe --
 25 that may be in the information of the calls and when the

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1 carry out and to be able to make that statement, so
 2 I had the data.
 3 Q. You had the call records but you didn't have the ARQ
 4 data. It hadn't yet been produced. That's actually in
 5 the first email in this chain. We can go up to it if
 6 you like.
 7 A. But this is referring to the Helpdesk.
 8 Q. Yes, but how would you have known whether counters were
 9 being used while these errors were occurring without the
 10 ARQ data?
 11 A. I don't know what the -- how I'd come to that conclusion
 12 but it's asking me to have a look and I'd like to think
 13 that I did.
 14 Q. What I'm saying to you, Mr Dunks, is that you didn't yet
 15 have the information you needed to have a look, and yet
 16 you had produced a witness statement in which you said
 17 that all the calls were routine, and you did nothing to
 18 change that, did you?
 19 A. Because of what I had done to investigate it, there
 20 wouldn't have been anything -- if I believed that there
 21 was no more information that's needed, and my witness
 22 statement was accurate to what I believed at the time,
 23 there wouldn't have been needed any further changes.
 24 Q. Let's go down to the bottom of the email:
 25 "Error Message: Error in node retrieval for node(s)

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1 calls were logged. I -- again, I can't remember what
 2 I would have done but I would have done something.
 3 Q. At the very least, your statement that had already been
 4 signed required a qualification, did it not, saying
 5 there are some further matters which need to be
 6 investigated when the ARQ data has been requested and
 7 supplied?
 8 A. Clarification that I still believed that that statement
 9 was true, yes.
 10 Q. You did nothing, Mr Dunks?
 11 A. What do you mean, I didn't --
 12 Q. Well, we do not see, do we, a further witness statement
 13 in which you qualify or say anything at all about the
 14 statement that we've just had a look at, in which you
 15 claimed that all the calls were routine.
 16 A. If the statement didn't need updating, because that
 17 statement was, in my opinion, still true, there was no
 18 update needed.
 19 Q. How was it still true, Mr Dunks, when Mrs Chambers had
 20 just set out all the ways in which the calls needed to
 21 be investigated, to find out whether they were routine?
 22 A. Yeah.
 23 Q. How could it still be true when those investigations had
 24 not been carried out and could not be carried out?
 25 A. Well, I'm sorry, but I would've done checks. I don't

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1 know how or what the process I did --

2 **Q.** No, all right --

3 **A.** So if nothing needed changing and I still -- that didn't

4 affect my opinion on the calls, I wasn't going to change

5 the statement.

6 **Q.** No indeed. You told us that there was no relationship

7 between the fact that the SSC were protected from giving

8 evidence by Mik Peach and the fact that you routinely

9 provided witness statements based on what they told you

10 without revealing that they had told you what you were

11 saying. You said there was no relationship between

12 those two things earlier on, didn't you?

13 **A.** Did I? Yeah. I --

14 **Q.** On the one hand, Mik Peach is over here protecting his

15 team, saying they're not to give any witness statements,

16 and, on the other hand, there's you providing witness

17 statements which say things that the SSC have told you

18 without revealing that the SSC have told you that; you

19 remember, you told us there was no relationship between

20 those two things?

21 **A.** Yes.

22 **Q.** We can see the relationship in action here, can't we,

23 Mr Dunks? Let's go back to Mrs Chambers' email, and

24 that first paragraph:

25 "Gareth, sending just to you initially.

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1 Mr Peach that is, "Actually, you know what, Mrs Chambers

2 would be better placed to look into these technical

3 matters that she says need to be investigated.

4 Mrs Chambers ought to look into them and she ought to

5 provide a witness statement". You didn't say that, did

6 you?

7 **A.** No, I didn't. No.

8 **Q.** You were covering for SSC because they were not prepared

9 to stand up and defend Horizon in court, weren't you?

10 **A.** No. That's not how it worked, I'm sorry. It wasn't.

11 **Q.** Just some further questions on a different topic,

12 Mr Dunks. You remember in the Bates litigation, when

13 the boilerplate wording in your statement was put to

14 you, you originally claimed that you were not following

15 the Fujitsu "party line". Do you remember that --

16 **A.** Yes, I do.

17 **Q.** -- that questioning? Later you did admit, of course,

18 that there was a template that you all used with the

19 boilerplates in it and that was something that you only

20 admitted when the statement from Mr Jenkins which was

21 identical to yours was put to you, yes; do you remember

22 that?

23 **A.** What's the word -- did you say boilerplates?

24 **Q.** Yes, that's a word that's often used when speaking of

25 legal wording that's been put into cover off all

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1 "I know you have even more on your plate than I do,

2 but my involvement has always been unofficial and on the

3 basis that I had time to do it."

4 Then at the very ending, she says:

5 "[If I am to do anything] it will have to be

6 officially agreed with my manager -- you can instigate

7 that, if you like, but I don't think I can keep

8 volunteering."

9 That was apparently accepted by you and your team

10 member, Penny Thomas. You didn't press her, did you, to

11 give an official witness statement. You didn't press

12 her. You allowed her to just keep volunteering in this

13 unofficial way, didn't you?

14 **A.** Well, volunteering, yes. The same as I would speak to

15 anybody within the SSC or anybody who was supplying me

16 with information for me to do my role.

17 **Q.** In effect, you were covering for Mrs Chambers, weren't

18 you?

19 **A.** Sorry, no. Covering for her? Covering for what?

20 **Q.** Covering with the fact that she did not want to give

21 evidence, she did not want to stand up and defend

22 Horizon in court but you were perfectly happy to?

23 **A.** I wouldn't say that was covering. I was happy with the

24 role that I was tasked to and asked to do.

25 **Q.** Neither you nor Ms Thomas thought to say to him --

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1 eventualities; standard wording, if you like.

2 **A.** Is it? I've never heard of it before.

3 **Q.** Well, it was put to you in the Bates litigation but

4 never mind. We don't need to worry about that. You

5 finally admitted that there was a Fujitsu party line,

6 didn't you?

7 **A.** I've finally admitted -- yes, I've gone over that and

8 I misinterpreted what he meant by a party line. I had

9 an understanding of what I thought he meant by a party

10 line.

11 **Q.** Yes. Well, now, of course, you are clinging to the fact

12 that there was a party line because what you're really

13 saying is, "It's not my fault that the party line was

14 misleading. It's not my fault I took the party line.

15 I was just following orders. That's what I was told to

16 put in witness statements and that's what I did". Yes?

17 **A.** That's my understanding when I first answered that

18 question, when I said no because that wasn't the case.

19 **Q.** I see. So you're now saying, are you, that your process

20 driven witness statements which were misleading were

21 entirely your own work?

22 **A.** No, what I was saying was, when he first asked me the

23 question I was following the party line, I understood

24 that to be that -- what you just said: that we were to

25 all told to stick by a story and follow the party line,

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1 and don't waiver from it, and we've been told what say.
 2 That's what I, in my understanding at the time, was
 3 answering and the answer was no. Later on in the
 4 questioning, he mentioned or stated that, following the
 5 party line was the use of templates. So I agreed, well,
 6 if that was his understanding, yes, I agree with them:
 7 we did use templates.
 8 I wasn't trying to cover or hide anything. I just
 9 was answering the question how I understood it.
 10 **Q.** Well, you haven't been prepared to reveal who drafted
 11 those templates, who was in charge of what was used from
 12 those templates, how it came about that you used this
 13 bit or that bit and so did Mr Jenkins.
 14 **A.** Sorry, I don't understand that.
 15 **Q.** Well, you haven't revealed anything to do with how those
 16 templates were actually used and who was in charge of
 17 them, have you?
 18 **A.** How they were used? They were used by -- what do you
 19 mean how they were used? They were used by us.
 20 **Q.** Who drafted them?
 21 **A.** Someone within Fujitsu.
 22 **Q.** Someone. Well, let's look at some of the standard
 23 paragraphs and just identify this: when Mr Jenkins was
 24 recently asked about the standard paragraphs from the
 25 templates and Mr Beer asked him about this paragraph,

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1 **Q.** Who instigated that change?
 2 **A.** I've no recollection of who instigated that change.
 3 I can't remember.
 4 **SIR WYN WILLIAMS:** Well, did you?
 5 **MS PAGE:** I'm so sorry?
 6 **SIR WYN WILLIAMS:** I said: did you, Mr Dunks? In other
 7 words did you quite deliberately, on some occasions, use
 8 the words "the computer" and on other times "the
 9 system", or was there a different template which you
 10 used from time to time?
 11 **A.** No, I don't believe there was a different template.
 12 I don't remember why --
 13 **SIR WYN WILLIAMS:** If there wasn't a different template, you
 14 personally must have decided to substitute "the system"
 15 for "the computer" on occasions; so I think what Ms Page
 16 wants to know is why you did that?
 17 **A.** That may have been on the request of the -- someone
 18 within the Post Office or one of their lawyers.
 19 I don't -- every time there was a change within
 20 a witness statement, it was spoken about and discussed,
 21 and then agreed on the wording. So there were many
 22 changes. The witness statement evolved through the
 23 years, and changes. How that was changed and the
 24 process, and when things were changed and things taken
 25 out, I can't remember that process and who instigated

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1 which you will no doubt recognise:
 2 "There is no reason to believe that the information
 3 in this statement is inaccurate, because of the improper
 4 use of the computer. To the best of my knowledge and
 5 belief at all material times the computer was operating
 6 properly or, if not, any respect in which it was not
 7 operating properly or was out of operation was not such
 8 as to affect the information held on it."
 9 Now, you know that wording, don't you? You use it
 10 yourself or have used it many times?
 11 **A.** Yes.
 12 **Q.** But you've also used that exact same wording replacing
 13 the words "the computer" with "the system". That also
 14 is something you have said in many, many witness
 15 statements.
 16 **A.** Okay.
 17 **Q.** What was the difference between "the computer" and "the
 18 system"?
 19 **A.** I'm not sure there -- what the difference was. It was
 20 still trying to convey the same opinion.
 21 **Q.** What is that opinion, then, Mr Dunks?
 22 **A.** What the statement says. I don't remember why those two
 23 words were changed, or --
 24 **Q.** Who instigated that change?
 25 **A.** Pardon?

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1 what changes.
 2 **SIR WYN WILLIAMS:** So you have no recollection of any kind
 3 as to any conversation between you and anyone which
 4 resulted in the phrase "the computer" being changed to
 5 the phrase "the system"; is that your evidence?
 6 **A.** No, no. Even now, I would regard that meaning the
 7 same -- trying to convey the same thing. I don't know
 8 why those two words were changed.
 9 **SIR WYN WILLIAMS:** So there's your answer, Ms Page. The
 10 computer and the system are the same thing.
 11 **MS PAGE:** Well, I wonder if I might just ask a little more
 12 on that, just by putting to you what Mr Jenkins said he
 13 thought "the computer" meant.
 14 He said that he thought "the computer" meant the
 15 computer that he was typing his witness statement on.
 16 That his desktop computer that he was typing it on was
 17 working properly. Does that make any sense to you,
 18 Mr Dunks?
 19 **A.** I don't know how or why -- how he came to that
 20 conclusion, I don't know. No.
 21 **Q.** Do you know how or why it was that he came to have that
 22 wording at all?
 23 **A.** In what -- sorry, in what --
 24 **Q.** How would he have come to have the template wording that
 25 your team used?

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1 A. Because -- actually, I'm not sure I ever saw any of
 2 Gareth's witness statements. I'm assuming that they
 3 were being -- used the same sort of templates to start
 4 off with, the witness statement templates.
 5 Q. Was that dealt with at a level above you, Mr Dunks? Was
 6 someone in charge of the template and how it was used?
 7 A. If someone had -- if you're saying someone had -- if
 8 some had more authority to me, and about those things,
 9 yeah, I believe so, yes.
 10 Q. Who? *(Pause)*
 11 Is your loyalty getting in the way here, Mr Dunks?
 12 A. My loyalty?
 13 Q. Is that why you're being so cagey about who was in
 14 charge of the standard wording in the witness
 15 statements?
 16 A. No, because I don't know who wrote the witness
 17 statement. I don't know who drafted the original
 18 witness statement.
 19 Q. You don't know who changed the wording --
 20 A. Um --
 21 Q. -- from one thing to another?
 22 A. Well, that would have been -- I mean, someone like --
 23 through discussions within the Post Office. I mean,
 24 I know that the wording at times of the ARQ witness
 25 statements were changed, because -- and that would have

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1 anyone ever tell you that it would be better not to make
 2 sure anyone knew what "KEL" stood for?

3 A. Not at all. I was never told -- I honestly believed
 4 that I -- I was never told, "Don't put this in, you
 5 mustn't say that", and that's going back to you --
 6 people implying that we were following a party line.
 7 I was never under pressure to put in something that
 8 I didn't want to put in.

9 **MS PAGE:** Thank you, sir. Those are my questions.

10 **SIR WYN WILLIAMS:** Thank you, Ms Page.

11 Mr Stein?

12 **Questioned by MR STEIN**

13 **MR STEIN:** Mr Dunks, I've got two areas to ask you questions
 14 about. I ask questions on behalf of a firm called
 15 Howe+Co, who have instructed me on behalf of a large
 16 number of subpostmasters. One of our clients with
 17 an eye for detail wants to see if you can help regarding
 18 the development of Horizon Online and its operating
 19 system. Okay?

20 So this goes back to around what, 2010, and the
 21 evidence that the Inquiry has is that whilst that was
 22 under development, that the new operating system -- or,
 23 sorry, the new Horizon Online system -- was using
 24 Microsoft NT 4.0 operating system, and the reason why
 25 was that it was regarded as being too expensive to

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1 been -- I'd have been involved -- I say involved,
 2 sorry -- I'd have been informed by someone like Penny
 3 because she ran -- she was managing the litigation so we
 4 were told that if there were any changes, we were then
 5 being told to use the new format.
 6 Q. Who chose the templates for you, Mr Dunks?
 7 A. Who chose the templates? We were told which templates
 8 to use.
 9 Q. By who?
 10 A. Management or the -- yeah, management. Either our line
 11 manager or the Litigation Support Manager.
 12 Q. Going back to your loyalty, Mr Dunks, was it your
 13 loyalty that led you not to reveal the existence or the
 14 content of the Known Error Logs in your witness
 15 statements?
 16 A. No, not at all, no, because I -- every witness statement
 17 that I supplied, I was aware that, if needed -- and
 18 which we did on many occasion -- supplied all the call
 19 data to be seen and -- so they could see within, if they
 20 investigated or looked at -- anybody who looked at that
 21 would see that there were KELs and they would have been
 22 able to request or -- that information as well. At no
 23 time was I hiding anything because I knew that
 24 information was available.
 25 Q. Did anyone ever tell you not to refer to the KELs? Did

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1 upgrade to a more current technology. So our question
 2 is this: can you help us with when Horizon Online was
 3 updated to a newer version of an operating system?

4 A. No, I can't remember the dates when we moved from one to
 5 another. No, I don't. I can't recall.

6 Q. Was it ever updated?

7 A. Well, Horizon was updated to Horizon Online, yes.

8 Q. Yes, but the operating system, being Microsoft NT 4.0,
 9 did it move on from that point?

10 A. Oh, right. Do you know, I can't remember. I can't
 11 remember. I believe it was changed when the new
 12 counters were run out for HNG-X, I think, but I can't be
 13 certain. I wasn't involved in the rollouts or updates
 14 and things like that.

15 Q. All right. If you're right about it being changed
 16 around the time of the new counters, roughly when would
 17 that be? So if we refer back to 2010, into the new
 18 Horizon Online system --

19 A. No, I'm sorry. The dates of all the updates I don't
 20 recall, sorry.

21 Q. The second point is this: we know that the Post Office
 22 is hoping to move on from the Horizon system by April
 23 2025, and moving on from, therefore, and away from the
 24 Horizon system. We're told by press releases from the
 25 Post Office that the new system is going to be called

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1 "New Branch IT". Now, you still work for Fujitsu. You
 2 work within the Customer Service Post Office Account
 3 Security team. Can you help us with how that's going?
 4 Is the suggestion to move on from the Horizon system and
 5 finish, therefore, the contractual relationship with
 6 Fujitsu going to make it by April '25?
 7 **A.** I'm sorry, you're asking the wrong person. I have no
 8 idea of that level of information.
 9 **Q.** None at all? You've not been given any updates to say
 10 that the Post Office Account is going to finish at any
 11 time this year or it's coming to an end and there may
 12 therefore be a change in your workplace?
 13 **A.** I don't recall that I've seen that because -- all I know
 14 is that the dates for the end of the contract have moved
 15 from the original date and has been pushed back.
 16 I don't know --
 17 **Q.** It keeps on moving and more money keeps on being paid.
 18 We're just trying to work out when the Horizon system is
 19 coming to an end.
 20 **A.** As I said, you're asking the wrong person. I can't
 21 answer that. I've got no idea.
 22 **MR STEIN:** All right. Thank you, Mr Dunks.
 23 **SIR WYN WILLIAMS:** Is that it, Mr Beer?
 24 **MR BEER:** Yes, it is. Thank you, sir.
 25 **SIR WYN WILLIAMS:** Well, thank you, Mr Dunks, for making
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1 a second witness statement and for giving evidence
 2 during the course of the day. I'm grateful to you for
 3 doing that.
 4 So I understand, Mr Beer, that we're going to start
 5 a little later tomorrow, at 10.05, with Mr McCall; is
 6 that correct?
 7 **MR BEER:** That's right, sir, to allow the fire alarm to
 8 occur, in particular.
 9 **SIR WYN WILLIAMS:** Fine. All right, then. 10.05 tomorrow.
 10 **MR BEER:** Thank you, sir.
 11 **(4.04 pm)**
 12 **(The hearing adjourned until 10.05 am the following day)**
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