

# OPUS 2

## INTERNATIONAL

Horizons Issues - Alan Bates & Others v Post Office Limited

Day 6

March 19, 2019

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1 Tuesday, 19 March 2019  
 2 (10.30 am)  
 3 Housekeeping  
 4 MR DE GARR ROBINSON: My Lord, redactions.  
 5 MR JUSTICE FRASER: Yes.  
 6 MR DE GARR ROBINSON: If I can give your Lordship an update.  
 7 I have been looking at these documents overnight. So  
 8 far I have found one document where I believe a small  
 9 redaction was mistaken and that's F/1225 and a clean  
 10 copy has been provided to my learned friend, two  
 11 documents where I believe the redactions are correct  
 12 which is F/1549 and F/708. My Lord, with the others  
 13 I simply need more time.  
 14 MR JUSTICE FRASER: I didn't intend you to have to do them  
 15 straight away.  
 16 MR DE GARR ROBINSON: One of them is 109 pages long.  
 17 MR JUSTICE FRASER: Yes. So why don't we just leave it that  
 18 there's no need now for you to give me an update until,  
 19 shall we say Thursday morning, and then if you just give  
 20 me a date by which you think you might be able to have  
 21 finished. I'm not expecting you to have done them  
 22 straight away or on Thursday there will be no criticism  
 23 if you haven't been able to do any more than just these  
 24 three because you are in the middle of calling your  
 25 evidence.

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1 MR DE GARR ROBINSON: And it is a slow process. I have to  
 2 say, on skimming the other documents I have not found  
 3 what appear to be any serious errors that are glaring.  
 4 There are some passages where I would like to speak to  
 5 my instructing solicitors so that I can understand what  
 6 they're about. They seem to be completely irrelevant  
 7 but I just want to ensure that they are for my own  
 8 satisfaction.  
 9 MR JUSTICE FRASER: Yes. I will be taking a slightly  
 10 different approach if I'm told these redactions are made  
 11 on the grounds of relevance rather than made on the  
 12 grounds of legal professional privilege or anything of  
 13 that nature.  
 14 MR DE GARR ROBINSON: Some of them are on the grounds of  
 15 irrelevance and confidentiality, some of them are on the  
 16 grounds of privilege.  
 17 MR JUSTICE FRASER: Well, you're going to need to identify  
 18 the ones that are on the grounds of irrelevance because  
 19 I'm likely to be taking a different approach if they are  
 20 said to be irrelevant -- obviously if it's legal  
 21 professional privilege or litigation privilege then  
 22 that's one thing. If it is said to be on the grounds of  
 23 relevance I will be adopting a slightly different  
 24 approach.  
 25 MR DE GARR ROBINSON: Well, my Lord, I hear what

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1 your Lordship says. It should be understood that the  
 2 Post Office business is massive and extremely diverse,  
 3 so, for example, if there's a review of the car accident  
 4 statistics in a given year, my Lord, that is completely  
 5 irrelevant. I don't know if your Lordship would expect  
 6 that to be included in any disclosure. But those are  
 7 the kind of issues we're talking about.  
 8 MR JUSTICE FRASER: Well, when one begins to dissect  
 9 a document on the basis of parts of that document being  
 10 irrelevant, in the circumstances of this case that's  
 11 something that I can look at and I might choose to look  
 12 at it to decide whether it is in fact irrelevant. If it  
 13 is legally professionally privileged, I'm not  
 14 obviously -- the assertion of privilege brings that to  
 15 an end.  
 16 MR DE GARR ROBINSON: Well, my Lord, that would be an  
 17 unusual course for your Lordship to adopt.  
 18 MR JUSTICE FRASER: It might be, but it's not an improper  
 19 course for me to adopt. But let's deal with these one  
 20 step at a time, all right? You have reviewed three, you  
 21 will give me the update on Thursday. I would like to  
 22 make it clear, though I have already, I don't want to  
 23 impose a burden on you during your evidence of time  
 24 because I have asked you to do it, so if on Thursday all  
 25 you can do is give me an intended timeframe by which the

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1 exercise might be completed, then that will help.  
 2 MR DE GARR ROBINSON: Very good, my Lord.  
 3 While we are on the subject of documents there is  
 4 one other point I should mention. Your Lordship will  
 5 recall the evidence last week, Mr Tank saying that he  
 6 had a box file of documents, and Mr Latif who is still  
 7 a subpostmaster saying that his staff searched records  
 8 which revealed that his transaction correction issue  
 9 occurred in January 2018 not March. My Lord, my  
 10 understanding is that Mr Tank has now disclosed three  
 11 documents and Mr Latif has disclosed none at all. Just  
 12 so your Lordship is aware, on Friday my instructing  
 13 solicitors wrote to Freeths making those points and  
 14 seeking disclosure of records and transaction logs  
 15 consulted by Mr Latif for the purpose of preparing his  
 16 witness statement, any notes by Mr Tank, documents in  
 17 the box file and CCTV recordings that were consulted by  
 18 Mr Tank, any other documents that any of the witnesses  
 19 consulted when preparing their witness statements and of  
 20 course any adverse documents. It sought a response by  
 21 close of business yesterday, we have all been very busy,  
 22 no response was received. I will keep your Lordship  
 23 informed as to progress on that issue.  
 24 MR JUSTICE FRASER: Thank you.  
 25 MR GREEN: I'm grateful, my Lord. My Lord, I don't know

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1 whether there's a copy of the unredacted document  
 2 available for your Lordship and the witness.  
 3 (Pause).  
 4 MR JUSTICE FRASER: Thank you very much.  
 5 MS ANGELA VAN DEN BOGERD (continued)  
 6 Cross-examination by MR GREEN (continued)  
 7 MR GREEN: Mrs van den Bogerd, we looked briefly at this  
 8 document yesterday.  
 9 MR JUSTICE FRASER: Is this 1225?  
 10 MR GREEN: It is 1225, my Lord, yes.  
 11 If we look on page 2 of 4, at the top of it we will  
 12 see there are six bullet points at the top --  
 13 A. Yes.  
 14 Q. -- which were previously redacted and now can be seen.  
 15 Do you see those?  
 16 A. Yes.  
 17 Q. And those are introduced in fact by the bottom paragraph  
 18 on the previous page, which is page 1 of 4.  
 19 A. Yes.  
 20 Q. And that says "Key performance indicators":  
 21 "The programme will track performance against the  
 22 following key performance indicators."  
 23 Yes?  
 24 A. Yes.  
 25 Q. And what we see there is that the key performance

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1 indicators for the programme were reduction of operating  
 2 cost by £3 million a year.  
 3 A. Yes.  
 4 Q. Reduction in net agent debt by £1 million. Reduction in  
 5 subpostmaster suspensions as a result of audit short  
 6 annuals to a level of 60 per year. Reduction of calls  
 7 into NBSC by 25%. Reduction of audit losses of 10k or  
 8 over, I think that should be, by 50% and satisfaction  
 9 with online training models of 95%.  
 10 So it's fair so say, isn't it, that one of the key  
 11 thrusts of that KPIs is cost saving?  
 12 A. Part of it, yes.  
 13 Q. And indeed that mirrors what we saw yesterday about the  
 14 introduction of Horizon Online?  
 15 A. Yes partly, yes.  
 16 Q. And --  
 17 A. Sorry, can I just say on this particular one the cost  
 18 reduction will come as if -- so the whole thrust of this  
 19 is if we eliminate the errors at the front end then we  
 20 won't need to obviously deal with errors at the back end  
 21 and that's obviously what the cost saving is driven  
 22 from.  
 23 Q. And so you could see when putting the branch support  
 24 programme together that it was likely to reduce  
 25 subpostmaster suspensions as a result of audit

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1 shortages, couldn't you?  
 2 A. Yes.  
 3 Q. So the measures that you had in mind would be likely to  
 4 lead to reduction in those suspensions?  
 5 A. Yes.  
 6 Q. And in a reduction of audit losses of £10,000 or more?  
 7 A. Yes.  
 8 Q. And to greatly increased satisfaction in online training  
 9 models?  
 10 A. Yes.  
 11 Q. And that reflected a recognition by you of where the  
 12 scope for improvement lay after you had carried out sort  
 13 of horizon scanning exercise, no pun intended, of the  
 14 difficulties that were being encountered by branches?  
 15 A. Yes. As I said yesterday it was across a number of  
 16 areas including what was coming through Business as  
 17 Usual, what I saw from the mediation scheme and the  
 18 branch support programme; all of those.  
 19 Q. Thank you. Could you now be shown very kindly {F/1330}.  
 20 This is a spreadsheet of call logs that you have  
 21 referred to in your witness statement. I will just read  
 22 out your witness statement, paragraph 184 {E2/5/42}, to  
 23 you while that's downloading. Under the "NBSC" heading  
 24 at paragraph 184:  
 25 "In terms of the use of the Helpline and NBSC

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1 generally, my colleague, Dean Whitehead, WFM & Telephony  
 2 Manager ..."  
 3 What's WFM?  
 4 A. Workforce management.  
 5 Q. Workforce management and telephony manager:  
 6 "... has prepared the attached spreadsheet which  
 7 appears ..."  
 8 We can see it is {F/1330}:  
 9 "... which includes the NBSC call data volumes from  
 10 30 March 2015 to 11 November 2018."  
 11 And the aggregated volumes, I understand, were not  
 12 tracked prior to March 2015, is that right?  
 13 A. I'm not sure it was in this format actually. We always  
 14 recorded the number of calls but how they have been  
 15 presented has changed.  
 16 Q. Let's just look then -- in the light of that answer  
 17 let's look at {E2/5/43}, which is what you say at 185.5.  
 18 So you say:  
 19 "In terms of the period of the available call volume  
 20 data, to confirm, while Post Office hold records of the  
 21 calls received that predate 30 March 2015 ..."  
 22 Because we have seen some in this trial, haven't we?  
 23 A. Yes.  
 24 Q. "... we do not hold in a readily accessible place any  
 25 aggregated call volume data from before this date."

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1 A. Yes.  
 2 Q. So you would actually have to look and see what the  
 3 numbers of calls were?  
 4 A. Yes.  
 5 Q. And then give evidence about that if you wanted to  
 6 explain it?  
 7 A. Yes.  
 8 Q. If we can go back please to {F/1330}, let's just look at  
 9 the headings at the top of the columns if we may. We've  
 10 got A is obviously date, B is "Calls offered" which is  
 11 calls made to the NBSC, C is calls answered, which is  
 12 calls answered by the NBSC, and then D is forecasted  
 13 calls and E is the difference between calls offered and  
 14 called answered. So that's the number of people not  
 15 getting through, isn't it?  
 16 A. Hanging up or -- yes, yes, or --  
 17 Q. Not getting through?  
 18 A. Yes.  
 19 Q. They make a call and the call is not actually answered?  
 20 A. Or they don't progress, yes, through ...  
 21 MR JUSTICE FRASER: For whatever reason, they don't get  
 22 through to the person.  
 23 MR GREEN: For whatever reason.  
 24 A. Yes, because sometimes -- sorry, there's an IVR message  
 25 on the answer, so if you pick up the phone and it will

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1 say "If you're ringing about this" -- so say we had  
 2 a known problem in the network, we would put a message  
 3 on to the helpline that would say "If you're ringing  
 4 about this particular issue we are aware of it, we're  
 5 looking at it and we will update as soon as we can", so  
 6 at that point someone might drop off.  
 7 Q. So might these numbers be where there were known  
 8 problems on the network? Might some of these drop-offs  
 9 be people who had been affected by known problems on the  
 10 network?  
 11 A. Sometimes, or it could be that they would ring and they  
 12 decide that they don't want to continue to wait, it  
 13 might be that a customer comes in whilst they are on the  
 14 phone and therefore they serve the customer rather than  
 15 waiting on the call.  
 16 Q. But one way or another they don't actually get through  
 17 to somebody on the helpline?  
 18 A. Yes, absolutely, that's correct yes.  
 19 MR JUSTICE FRASER: Mr Green, is this going to be of  
 20 enormous assistance to me in resolving the issues?  
 21 MR GREEN: My Lord, it probably is of small relevance but  
 22 I have pretty much finished my examination.  
 23 Was there any increase in budget for the helpline in  
 24 the branch support programme?  
 25 A. In the branch support programme? I don't ... I don't

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1 recall an increase in budget. What we did is we  
 2 restructured so that we had more focus on the tier 2  
 3 support, so that when the calls came in if there were  
 4 calls that couldn't be easily rectified at the T1, that  
 5 get to T2 and we made Horace information available to  
 6 tier 2 as well so they could look into the data in  
 7 branches to be able to assist with problems.  
 8 Q. So previously, prior to the branch support programme,  
 9 tier 2 couldn't look at the Credence data?  
 10 A. That's correct.  
 11 Q. Let's move please to the section in your witness  
 12 statement where you deal with the subpostmaster evidence  
 13 and if we look at paragraph 30 please {E2/5/11}, you  
 14 explain there:  
 15 "To prepare this evidence, I have had to rely on  
 16 a small team of people at Post Office (predominantly  
 17 former trainers and auditors who have complemented their  
 18 hands-on branch knowledge with investigative skills  
 19 honed from several years of investigating claims of  
 20 accounting issues in branches) to help me investigate  
 21 the allegations raised."  
 22 So that sounds like a pretty impressive group of  
 23 people skills wise, is that fair?  
 24 A. They are good, yes.  
 25 Q. As you have described them there?

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1 A. Yes, yes.  
 2 Q. And how many people have been in this small team?  
 3 A. About ten.  
 4 Q. Ten. And they are all people at Post Office?  
 5 A. Yes.  
 6 Q. And can you remember who they are?  
 7 A. Yes.  
 8 Q. Could you tell us who they are?  
 9 A. So there's Kath Alexander, Shirley Hailstones,  
 10 Reanne Fox, Michelle Cohone(?), Karen Derb(?),  
 11 Peter Todd, Paul Smith, Keith Scott, Matt Waller --  
 12 sorry, how many is that? I'm trying to think if I have  
 13 forgotten anybody.  
 14 Q. Well, at least those?  
 15 A. Yes.  
 16 Q. If you remember any more you can tell us.  
 17 MR JUSTICE FRASER: That was nine.  
 18 A. That was nine. I'm in trouble now because I have  
 19 forgotten one, haven't I?  
 20 MR GREEN: That's not something to be in trouble over.  
 21 You say that they have assisted with the preparation  
 22 of your evidence responding to the subpostmaster's  
 23 evidence?  
 24 A. That's right, yes.  
 25 Sorry, one more was Hugh Williams. Sorry, it has

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1 just come back to me.  
 2 Q. And that's bringing to bear some fairly high-powered  
 3 resources on this point, isn't it?  
 4 A. Yes.  
 5 Q. Perhaps more high-powered resources and care and time  
 6 than you might normally be able to devote to someone who  
 7 just raised a query in the normal course of business?  
 8 A. Well, actually some of them -- that's their role in  
 9 Business as Usual as well.  
 10 Q. Okay, so they've got experience of actually doing it in  
 11 real cases?  
 12 A. Yes.  
 13 Q. And when you looked at this witness statement, this  
 14 section of your witness statement in particular, and  
 15 there were documents that were referred to, did you  
 16 actually look at those documents to see if they did  
 17 support or could conceivably support what you were  
 18 saying in your witness statement about them?  
 19 A. Yes.  
 20 Q. You did?  
 21 A. So they prepared the information and I have reviewed  
 22 everything and looked into that to see whether that  
 23 supports, yes. I can't recall every single piece of  
 24 information, but that's what I have done.  
 25 Q. And this has been prepared with the benefit of the ARQ

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1 data?  
 2 A. Yes.  
 3 Q. And the NBSC helpline call logs where available?  
 4 A. Yes.  
 5 Q. And the helpline logs would not normally be available to  
 6 an SPM if they called up themselves?  
 7 A. They are not routinely provided, no.  
 8 Q. After a call they don't get sent the record --  
 9 A. No, they don't.  
 10 Q. -- to see whether it has been correctly recorded or  
 11 fairly reflects what they have rung up about?  
 12 A. No, that's correct.  
 13 Q. In fact we see Angela Burke later on has to make a data  
 14 subject access request --  
 15 A. Yes.  
 16 Q. -- to get hold of a transcript of her own call.  
 17 A. Yes.  
 18 Q. And pay the fee and produce ID in order to get the  
 19 transcript of her own call with the helpline. Yes?  
 20 A. Yes.  
 21 Q. Just parenthetically, do you think that's a satisfactory  
 22 way to respond to a subpostmaster or subpostmistress  
 23 asking for a transcript that you hold of their call?  
 24 A. No, I think we should be providing it. If it is -- so  
 25 if we were to routinely provide every call that would be

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1 quite an onerous task as you would imagine with the  
 2 number of calls. If it is to support a particular issue  
 3 where there is an issue with, you know, a loss or  
 4 something then I think we should provide.  
 5 Q. That hasn't been the practice thus far as we have seen?  
 6 A. No, it hasn't.  
 7 Q. And let's turn, if we may, to Mr Latif's case which --  
 8 if we look please at paragraph 90 {E2/5/23}. You say:  
 9 "My strong belief is that Mr Latif has recalled  
 10 these events incorrectly. The transaction data for the  
 11 branch ..."  
 12 You give three POL numbers:  
 13 "... shows that in the relevant period (June  
 14 to August) every transfer out has a corresponding  
 15 transfer in. I also note that the ARQ data show that  
 16 there is no stock unit SJ1 as asserted by Mr Latif,  
 17 however there is a stock unit SP1."  
 18 Let's take that in stages. He fairly accepted there  
 19 was a typo on SJ1 and SP1 so let's leave that aside.  
 20 Now, you understand, do you, the different types of data  
 21 that you can have, transaction data, event data and  
 22 session data?  
 23 A. Yes.  
 24 Q. And do you understand the difference between them or  
 25 not?

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1 A. From this -- yes, yes, I do, yes.  
 2 Q. Did you know the difference between them before you did  
 3 this exercise?  
 4 A. Yes, I have seen the data before. We have used this  
 5 before.  
 6 Q. But did you have a really clear understanding of the  
 7 difference between event data and transaction data?  
 8 A. So the transaction data is everything that -- all the  
 9 transactions. The event data are things that would  
 10 record transfer in, rem ins, it was the other  
 11 information.  
 12 Q. What about session data?  
 13 A. Session data referred to the sessions on there, yes.  
 14 Q. Do you know really what that means very well, or ..?  
 15 A. I've not -- in terms of getting into the detail of it  
 16 then not at that level.  
 17 Q. No.  
 18 A. What I look at is the information that would be able to  
 19 walk me through a sequence of events and getting under  
 20 the skin of what we can see, put the picture together.  
 21 Q. Is that level of knowledge why the three POL documents  
 22 you refer to in your witness statement were in fact  
 23 event data not transaction data?  
 24 A. Sorry, the transaction data should be in there as well.  
 25 Q. Well, yes, it should, but the three specific document

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1 references that we had to go and read and look at to try  
 2 and find what you were saying, there's no row or  
 3 anything like that mentioned, those documents are event  
 4 data documents, aren't they?  
 5 A. Sorry -- well, I understood them to be transactions as  
 6 well.  
 7 Q. Let's have a look and just trace it through. Let's look  
 8 at {F/1354} please as an example. This is the second of  
 9 the POL references in that paragraph. If we could go to  
 10 sheet 1 rather than the summary please. So this is the  
 11 event data.  
 12 A. Yes.  
 13 Q. It's not the transaction data and it's not data from  
 14 which we can see that every transfer out has  
 15 a corresponding transfer in of the same amount, is it?  
 16 Do you want to go across to the right a bit?  
 17 A. Not on this you won't see that, no.  
 18 MR JUSTICE FRASER: Could you keep your voice up please.  
 19 A. Sorry, yes.  
 20 MR GREEN: And it shows receipts printed and things like  
 21 that, it shows reversals, variance checks, things like  
 22 that.  
 23 A. Yes.  
 24 Q. So you can't actually see that?  
 25 A. Not from this one, no.

1 Q. No. And all three of the specific POL numbers,  
 2 documents, at paragraph 90 -- go back to page 23 of your  
 3 witness statement {E2/5/23} -- were actually references  
 4 to events data. Were you aware that this was taken up  
 5 with your solicitors in February?  
 6 A. No, I wasn't. Because to look at this I have looked at  
 7 the event data, as you say, to look at corresponding  
 8 transfers in and out and then the transaction data to  
 9 look at the values of those to see from which stock  
 10 unit, so ... sorry, I didn't put the reference numbers  
 11 on the document, so ...  
 12 Q. But the POL number documents that were in the statement  
 13 that you had in front of you when you were being shown  
 14 this, I asked you at the beginning did you look at those  
 15 documents to see whether they could support what you  
 16 were saying they showed and you said yes.  
 17 A. Because I --  
 18 Q. So did you have other documents in front of you, or ...?  
 19 A. So I understood that to have included the transaction  
 20 data as well, so that's my mistake in terms of the  
 21 number in there.  
 22 Q. Very briefly I will just show you this: {H/186/2}. This  
 23 is a 4 February 2019 letter and it relates to, at the  
 24 bottom of the page, Mr Latif. Paragraph 8:  
 25 "Mrs van den Bogerd refers to 'the ARQ data' at

1 paragraph 90, without exhibit. Please identify the  
 2 intended document.  
 3 "Also at paragraph 90, Mrs van den Bogerd exhibits  
 4 transactional data for June to August 2015. We  
 5 anticipate that data outside of this range was  
 6 identified by Post Office and considered by ... her  
 7 small team ... As Post Office must recognise, Mr Latif  
 8 may have misremembered the date of the incident."  
 9 Go over the page please {H/186/3} and then there's  
 10 a reference to data in paragraph 98, checking that, do  
 11 you see that?  
 12 A. Sorry, where are we?  
 13 Q. Paragraph 11?  
 14 A. Yes.  
 15 Q. The reference to the POL document: is this the correct  
 16 document or not? And if we look at {H/196/18} there's  
 17 a response on 11 February and the reference to ARQ data  
 18 at the bottom, in paragraph 90 without exhibit says:  
 19 "The reference to 'ARQ data' is to the transaction  
 20 data for the branch which referred to the exhibit  
 21 mentioned in the previous sentence."  
 22 So it specifically asked about is this the  
 23 transaction data in these three event data logs and then  
 24 that comes back. Were you aware of any of this going on  
 25 in the background in relation to what you had said in

1 your witness statement?  
 2 A. No. I understood the transaction data was there.  
 3 Q. Okay. Because it was actually disclosed on 21 February  
 4 and Mr Latif went to Kashmir on 19 February.  
 5 A. Right.  
 6 Q. So if we go back to paragraph 90 {E2/5/23}, you will see  
 7 that the three additional references underneath at  
 8 {F/1353.1}, {F/1365.1} and {F/1371.1}, are additional  
 9 documents which are not those POL documents, but you  
 10 didn't know about any of that?  
 11 A. No, sorry, I didn't know about that.  
 12 Q. To find the information about the value of stock  
 13 transfers, which was what was in issue --  
 14 A. Yes.  
 15 Q. -- we need to look at the transaction data, don't we?  
 16 A. Yes, yes.  
 17 Q. Pausing there, were you aware that there had been two  
 18 quite widespread and persisting bugs which related to  
 19 transfers between stock units going awry when you made  
 20 your statement? Did anyone tell you that?  
 21 A. At this time?  
 22 Q. When you made your statement did you know that within  
 23 the Horizon system there had been two quite important  
 24 bugs which related to problems with stock unit  
 25 transfers, or not?

1 A. Not specifically .  
2 Q. No. Because both the Callendar Square bug and the  
3 Dalmellington bug related to problems arising on  
4 transfers between stock units, didn't they?  
5 A. I knew about the Dalmellington one, that's an  
6 outreach -- an outreach issue, so I was aware of the  
7 Dalmellington. I hadn't heard about the  
8 Callendar Square one.  
9 Q. But you didn't have the overlap with that in mind when  
10 you were putting your witness statement together about  
11 Mr Latif's situation?  
12 A. So, no, when I put this together we have looked at the  
13 data to see whether that -- does the data support what  
14 Mr Latif has said and what we can see and what we can  
15 see in there is that we've got the information that  
16 shows that those transfers have been transferred out and  
17 transferred in within the branch.  
18 Q. Well, let's look at it quickly if we may.  
19 MR JUSTICE FRASER: Just before we do I would just like to  
20 understand your last answer. Mr Green was asking you if  
21 you had the overlap between Dalmellington bug and  
22 Callendar Square bug in your mind when you signed or  
23 prepared your witness statement dealing with Mr Latif.  
24 A. Not specifically .  
25 MR JUSTICE FRASER: You didn't, all right .

1 Mr Green.  
2 MR GREEN: Thank you very much.  
3 Could we look please now at {F/1365.1}. And can we  
4 look at sheet 1 please rather than the summary. There  
5 are 28,890 rows. You didn't refer to any particular row  
6 number in your witness statement because when you made  
7 your witness statement you weren't looking at this  
8 document, or weren't referred to this document, which  
9 had a different POL number. Can you remember roughly  
10 where it was?  
11 A. Sorry, where what was?  
12 Q. Where you were looking. Did you do it by date?  
13 A. So I would have filtered on it by date.  
14 Q. You think you would have done that?  
15 A. By value.  
16 Q. Did you have it in paper form --  
17 A. By stock unit.  
18 Q. -- or electronic?  
19 A. Electronic.  
20 Q. Can we go to row 3478 please. So there we've got SP1,  
21 4 July 2015, 13.16.04. Then 2,000 in column L. Do you  
22 want to just quickly see what column L is?  
23 A. If you can go to the top that would be the value, yes.  
24 Q. So column L is "Sale value", can you see?  
25 A. Yes.

1 Q. Column K is quantity, column J is "Product number". Do  
2 you see that?  
3 A. Yes.  
4 Q. If we click back on 3478, so that's on 4 July, £2,000,  
5 and a minus £2,000 underneath it. Is that what you were  
6 looking at, or not?  
7 A. Specifically that particular row, is that what you mean?  
8 Or -- because this is the data, yes.  
9 Q. So you filtered by date so we have gone to 4 July,  
10 beginning of July. Where did you look?  
11 A. So for the whole of July filtered on the value of 2,000  
12 which would obviously condense the spreadsheet.  
13 Q. Okay, do you want to do that?  
14 A. Yes.  
15 Q. The short point is you can't tell -- let's just pause  
16 before we do that exercise. The short point is you  
17 can't tell from this line what that is, can you?  
18 A. Not on this particular line. So what -- so using the  
19 event data and the transaction data, looking at the  
20 event data for the record of the transfers in and  
21 transfers out, that would tell you all the transfers in  
22 and the transfers out that had happened in that  
23 particular -- however you wanted to filter it. So,  
24 for instance -- so we looked at June, July and August.  
25 That would filter it, looking then -- going from the

1 event data then to the transaction log for the  
2 corresponding times and then filter it by stock unit and  
3 user to narrow it down.  
4 Q. Okay. Do you know what the code 4910 is in that line?  
5 Do you know what product code that relates to?  
6 A. Sorry, I would need that list at the side of me to --  
7 I'm not that close to the detail. So there's a list of  
8 all the product codes and the IDs that we have disclosed  
9 and I would -- my team would know that off the top of  
10 their head, I would need to work off the sheet.  
11 Q. You would need to look at the ID list. We can see  
12 what's been disclosed at {F/1292.2}. Those are the  
13 product ID lists, aren't they?  
14 A. Yes.  
15 Q. And one of the things we notice about the product ID  
16 lists is they are different lengths, aren't they?  
17 A. Yes.  
18 Q. So Royal Mail label balance is 32072, that's five  
19 digits, and, for example, Visa debit payment is also  
20 five digits, but some other things, stamps and things,  
21 are only two digits?  
22 A. Yes.  
23 Q. And they vary, don't they? We've got four digits for  
24 Christmas second stamp books.  
25 A. Yes, they do.

1 Q. They vary in length. And some of those product codes  
 2 are provided by third parties, aren't they, so  
 3 Post Office is not in control of them?  
 4 A. Yes. I don't know where they come from.  
 5 Q. Okay.  
 6 Let's go back please -- let's just look, if we may,  
 7 at your statement at page {E2/5/23}, paragraph 91.2.  
 8 That was the analysis that you did in your witness  
 9 statement when you did it in November.  
 10 A. Yes.  
 11 Q. And you say there:  
 12 "... there were two transfers of £2,000 from the AA  
 13 stock unit to the SP1 stock unit, both of which were  
 14 successful."  
 15 A. Yes.  
 16 Q. And then you say:  
 17 "There were 4 separate transfers of £2,000  
 18 in August 2015 (on the 1st, 3rd, 5th, 26th) all of which  
 19 were successfully transferred into stock unit SP1."  
 20 So that's what you said in --  
 21 A. November.  
 22 Q. -- November. Then you have had to amend your account of  
 23 what transactions in fact took place, haven't you?  
 24 A. Yes.  
 25 Q. So 91.2 should now read that in July 2015 there were two

1 transfers of £2,000 "between" instead of "from", yes?  
 2 A. Yes.  
 3 MR JUSTICE FRASER: We are still in paragraph 90?  
 4 MR GREEN: We are still in 91.2, my Lord.  
 5 MR JUSTICE FRASER: 91.2, yes.  
 6 MR GREEN: So it is "between" instead of "from" and "and"  
 7 instead of "to" and then after stock unit effectively  
 8 saying one each way.  
 9 A. Yes.  
 10 Q. Both of which were successful, and then 91.3 has also  
 11 been changed to say that instead of four separate  
 12 transfers, in total there were five, adding at the end  
 13 of the sentence "and one on 3 August which was  
 14 successfully transferred into stock unit AA".  
 15 A. That's right.  
 16 Q. That correction reflects the fact that the account that  
 17 you had previously given wasn't actually right, was it?  
 18 A. It wasn't as -- it didn't have as full an explanation as  
 19 I have done on my correction, no.  
 20 Q. That's slightly finessing it on the first one, isn't it,  
 21 because have a look. You say there were two transfers  
 22 from AA to SP1.  
 23 A. Yes.  
 24 Q. And that wasn't correct, was it?  
 25 A. No.

1 Q. It's not a question of being full or not full, it's just  
 2 wrong, isn't it?  
 3 A. Which is why I made the correction, yes.  
 4 Q. But it is wrong, it's not a question of full or not  
 5 full, is it?  
 6 A. The statement that said that the transactions -- there  
 7 were corresponding entries for transfers in and out for  
 8 2,000 is right and what I have done in the correction  
 9 is, particularly on 91.3, brought in the other one as  
 10 well and expanded the other one, yes. So I wanted to  
 11 make it clear on there that there was more than I'd put  
 12 in my statement.  
 13 Q. Well, I understand adding in the fifth one, but just the  
 14 very short point is 91.2 was wrong, the statement was  
 15 wrong. They weren't two transfers from AA to SP1 at  
 16 all, were they? It was one way --  
 17 A. And one the other.  
 18 Q. -- and one the other?  
 19 A. Yes, that's correct.  
 20 Q. Right. And you would agree that getting these things  
 21 correct would be very important for fairly resolving any  
 22 issue about discrepancies raised by an SPM?  
 23 A. Yes, of course.  
 24 Q. And whether or not the transaction correction process is  
 25 a countermeasure within the Horizon system --

1 A. Yes.  
 2 Q. -- as Dr Worden has suggested, you are not suggesting  
 3 that this trial is part of the Horizon system and the  
 4 countermeasure, are you?  
 5 A. Sorry, can you repeat that?  
 6 Q. Dr Worden regards transaction corrections as one of the  
 7 countermeasures in the robustness of Horizon.  
 8 A. Yes.  
 9 Q. It would be are ridiculous to suggest this trial is  
 10 a countermeasure for the robustness of Horizon, so the  
 11 things we find out here are wrong and then can be  
 12 corrected?  
 13 A. I see, yes, agree.  
 14 Q. That's an absurd suggestion, isn't it?  
 15 A. I agree.  
 16 Q. So let's look, if we may please, at the transaction data  
 17 itself, which is {F/1365.1}. And let's look at 21 July.  
 18 Parenthetically while that is loading, you didn't  
 19 actually refer to or exhibit the product list, product  
 20 ID list, did you, in your statement?  
 21 A. No, I didn't.  
 22 Q. That was necessary to try and decipher these  
 23 spreadsheets?  
 24 A. Yes.  
 25 Q. So that had to be found in the disclosure, yes?



1 A. Yes.  
 2 Q. So having done that let's go please to row 18358 please.  
 3 Now, is this the row that you think is a relevant row  
 4 for this, or is it the next one?  
 5 A. Sorry, relevant for ...?  
 6 Q. Relevant for Mr Latif's transfers --  
 7 A. The transfers in and out from AA to SP1?  
 8 Q. Which ones should the court look at?  
 9 A. So it would be both.  
 10 Q. Okay, do you know what they are both doing?  
 11 A. It's moving the cash out of --  
 12 Q. Which one is moving the cash?  
 13 A. So the first one is 13.54, that's the first one, and the  
 14 corresponding one is the second one below it then.  
 15 Q. Okay.  
 16 A. So it happens in two stages on this report.  
 17 Q. So when Mr Latif was being cross-examined on this -- and  
 18 the transcript reference is Day 2/63 lines 1 to 14  
 19 {Day2/63:1}, we don't need to go there -- it was  
 20 suggested to him that the transactions either side of  
 21 these two entries were back office entries that he  
 22 didn't need to worry about. Actually, code 1 is cash,  
 23 isn't it?  
 24 A. That's right.  
 25 Q. So that's an important part of the transaction?

1 A. Yes.  
 2 Q. But you would need the product list to know that,  
 3 wouldn't you?  
 4 A. You would, yes.  
 5 Q. And 6276 means a transfer in, doesn't it?  
 6 A. Yes.  
 7 Q. And 6277 means a transfer out?  
 8 A. Yes.  
 9 Q. Are you just being agreeable, or is that something you  
 10 know?  
 11 A. I would need -- well from this, yes, I know that, but as  
 12 I said earlier, the list is what I would need --  
 13 Q. If you take it from me at the moment.  
 14 A. Yes.  
 15 Q. Us having found the list, that does appear to be what it  
 16 says.  
 17 A. Yes.  
 18 Q. And how much of this did you know when you signed your  
 19 witness statement? Or is this something that you have  
 20 learned more about since you suggested the corrections  
 21 in preparing for the trial?  
 22 A. So as I said in my witness statement, because of the  
 23 time to put that together I relied on the team to pull  
 24 it all together. I had reviewed it but not into this  
 25 level of absolute detail. So what I have looked at is

1 the list of the product IDs, that list is something that  
 2 I would need to use as I do use -- because I don't do  
 3 the same frequency as my team, is something I would use  
 4 and that's when I have made the corrections to say  
 5 actually I need to explain that a bit more, which is why  
 6 I made the corrections.  
 7 Q. Let's compare the transaction data with the event data  
 8 for a second. Now, if we just look just a little bit  
 9 higher up, can you see 6277 in row 18352?  
 10 A. Yes.  
 11 Q. 6277, with a 1 above it, that's cash and a transfer out,  
 12 yes?  
 13 A. Yes.  
 14 Q. So this sequence appears to begin at 13.52.17, do you  
 15 see that?  
 16 A. Yes.  
 17 Q. And Horizon automatically prints out one receipt for  
 18 a transfer in and one receipt for a transfer out,  
 19 doesn't it?  
 20 A. Yes.  
 21 Q. I think you mentioned that at paragraph 88 of your  
 22 witness statement.  
 23 A. Yes.  
 24 Q. And indeed I think that -- it's probably uncontroversial  
 25 but I can take you to a reference of the original design

1 of Horizon, but that's how it was designed to work from  
 2 the outset?  
 3 A. Yes. And with a place to sign on the piece of paper as  
 4 well, yes.  
 5 Q. Can we go please now to the event data at {F/1354},  
 6 which was the second of the original POL reference  
 7 documents you gave in your witness statement, and let's  
 8 look please at row 8528. Do you see that? "AP branch  
 9 receipt"?  
 10 A. Yes.  
 11 Q. Yes? And we have then got "Transfer out slip - office  
 12 copy", do you see that?  
 13 A. Yes.  
 14 Q. And then at 56134 we've got "AP branch receipt",  
 15 "Transfer in slip - office copy" and "Transfer in slip -  
 16 office copy".  
 17 A. Sorry, I have lost you.  
 18 MR JUSTICE FRASER: Use the row number please.  
 19 MR GREEN: Sorry, 8534. Do you see 8534?  
 20 A. The one that is highlighted now, yes.  
 21 Q. How many transfer in slips do you see printed out there;  
 22 one or two?  
 23 A. There's one below that as well.  
 24 Q. Yes. And they are 4 seconds apart, aren't they?  
 25 A. Yes.

1 Q. Did you notice that instead of one transfer in slip, two  
 2 had printed out, when you made your witness statement?  
 3 A. No. I can't say I did, no.  
 4 Q. But this was the event data document to which your  
 5 witness statement expressly referred?  
 6 A. Yes.  
 7 Q. Two separate receipts being printed out instead of one  
 8 was a feature of the Dalmellington bug, wasn't it?  
 9 A. I can't recall exactly.  
 10 Q. Let me show you. Let's look at {E2/11/26} please. This  
 11 is in the table annexed to Mr Parker's witness statement  
 12 and do you see the short name is "Unexplained  
 13 discrepancies (duplicate rem in)"; do you see that?  
 14 Under the short name?  
 15 A. Yes.  
 16 Q. And there is Mr Coyne's summary and then if we go to  
 17 "Response to Mr Coyne", Fujitsu's comments, if we go  
 18 across to the right, "Financial impact on branch  
 19 accounts":  
 20 "This issue caused a discrepancy in the  
 21 subpostmaster's outreach branch which was easy to  
 22 identify from the transaction logs available through  
 23 Horizon and the fact that separate receipts were printed  
 24 for each transaction."  
 25 Yes?

1 A. Yes, I see that.  
 2 Q. Did anyone in your small team flag any of this up to you  
 3 to help you give the court a fair picture in your  
 4 witness statement?  
 5 A. Are you referring to the Dalmellington case or to the  
 6 slips?  
 7 Q. The fact that there had been two transfer in slips  
 8 printed --  
 9 A. No.  
 10 Q. -- and the fact that that was what was being said by  
 11 a witness in this case to be how you could spot the  
 12 Dalmellington bug; did anyone tell you that?  
 13 A. Sorry, so the Dalmellington bug I knew was specific to  
 14 outreaches.  
 15 Q. I understand that, but you knew there had been  
 16 problems -- well, you didn't have in the forefront of  
 17 your mind, we have established --  
 18 A. Yes, yes.  
 19 Q. -- that these two bugs are about transfers between stock  
 20 units and that was obviously potentially relevant to the  
 21 Mr Latif case. My question to you is simple: did anyone  
 22 point out to you the two transfer in slips and you have  
 23 said no.  
 24 A. No.  
 25 Q. And did anyone point out to you that where there had

1 been previous issues with transfers between stock units,  
 2 known problems, one of the indicators was a duplicate  
 3 slip being produced? No one pointed that out to you,  
 4 did they?  
 5 A. Not -- no, they didn't, but the Dalmellington is an  
 6 outreach, which is a different scenario to within branch  
 7 transfer anyway, because it's a rem out and rem in in  
 8 the Dalmellington case.  
 9 Q. Does any of that cause you to wish to think again about  
 10 what you have said about Mr Latif's situation? Does it  
 11 worry you at all?  
 12 A. So it is something that I would want to go back and have  
 13 a look at.  
 14 Q. I understand.  
 15 A. But if we go back to -- so in terms of the data that  
 16 I have looked at, and I have looked at Mr Latif's data  
 17 in detail, if you go back to and use the data to look at  
 18 the transfers in and out, look at what Mr Latif has  
 19 said, including what he said last week around the fact  
 20 he did that himself, that doesn't show on the data that  
 21 we've got.  
 22 Q. Okay, well, let's look -- on your understanding of it?  
 23 A. Mm-hm.  
 24 Q. Let's look at paragraph 98, the TC/TA issue. It is at  
 25 {E2/5/24}. This is still in Mr Latif's case.

1 A. Yes.  
 2 Q. "The transaction data [and you give a POL reference]  
 3 including data relating to TCs, shows that the branch  
 4 received two TAs on 18 January 2018."  
 5 A. Yes.  
 6 Q. Now, the POL reference given to that event data was  
 7 actually to March 2018 data. Did you spot that when you  
 8 were compiling your witness statement?  
 9 A. Sorry, no. I didn't. The data I looked at was the  
 10 correct data.  
 11 Q. Yes. It has now been hyper-linked. If we follow the  
 12 link that's now on there, it is to the transaction data  
 13 for January 2018 which is the relevant set of data, yes?  
 14 A. Yes, which is the data I looked at.  
 15 Q. Okay, did you actually look at the data yourself at the  
 16 time you did this?  
 17 A. I had a high level, but I have done more work since  
 18 then, yes. Which is what I set out in my statement as  
 19 I said.  
 20 Q. I see. Let's look please at {F/1761.1} and again  
 21 there's no reference in your witness statement to where  
 22 the data that you are referring to shows what you are  
 23 saying.  
 24 A. Yes.  
 25 Q. And you can see why that would be helpful for other

1 people to understand what your theory is?  
 2 A. Yes, these aren't the easiest things to ...  
 3 Q. Especially difficult if no one tells you which specific  
 4 entries they are talking about?  
 5 A. Yes, agreed.  
 6 Q. If we look at row 12983 please. Can you see there are  
 7 four entries there? Are those the entries you had  
 8 a look at?  
 9 A. Sorry, on 12983?  
 10 Q. Yes, 12983 is the first of four entries.  
 11 A. Right, yes.  
 12 Q. Are those the ones you had in mind, or can you not  
 13 really remember?  
 14 A. It was the 25.  
 15 Q. Yes.  
 16 A. Two 25s booked in.  
 17 Q. There are two 25s there, aren't there?  
 18 A. Yes.  
 19 Q. And they are both positive 25s?  
 20 A. Yes.  
 21 Q. And do you know what the product codes were? Did you  
 22 look that up?  
 23 A. From this I can't recall, but what came in was the  
 24 scratchcards.  
 25 Q. Okay, well, just to help you, 35341 appears to be £10

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1 scratchcards?  
 2 A. Yes.  
 3 Q. 33327 is £3 scratchcards and 5473 is £5 scratchcards.  
 4 A. So the issue was with the £10 ones.  
 5 Q. Okay, let's look at that and follow it through. You say  
 6 in your witness statement that two transaction  
 7 acknowledgements decreased stock when they should have  
 8 increased stock.  
 9 A. That's correct.  
 10 Q. Which ones are they?  
 11 A. 25.  
 12 Q. And if we could look please at line 35341.  
 13 MR JUSTICE FRASER: Can you use the row not the product  
 14 code.  
 15 MR GREEN: I'm so sorry.  
 16 Can we just go please to 4 January I think at  
 17 row 2237. So we've got 2237, 4 January. I just want to  
 18 show you how this appears to work. So at 6.55, this is  
 19 the same code, yes, 35341?  
 20 A. Yes.  
 21 Q. At 6.55 in the morning you've got minus 20, do you see  
 22 that?  
 23 A. Yes.  
 24 Q. If we look at row 2309, at 8.54 in the morning we've got  
 25 plus 20, do you see that? 35341.

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1 A. Yes.  
 2 Q. So you've got minus 20 followed by plus 20. Let's go to  
 3 row 6046. Do you see that's 9 January at 6.11 in the  
 4 morning? You've got again 35341, you've got minus 25.  
 5 A. Yes.  
 6 Q. And then if we go to row 6213, at 9.15, do you see there  
 7 you've got plus 25? And the way we found this was by  
 8 searching on the code -- it is obviously quicker in  
 9 court to go to the specific row numbers, but this is by  
 10 searching the code 35341 and tracing through the  
 11 entries.  
 12 So you get a negative entry and then a corresponding  
 13 positive one?  
 14 A. Mm-hm.  
 15 Q. Yes? And we see it again at row 10202 and there's the  
 16 minus 25 and 10331, plus 25. Had anyone pointed out  
 17 that pattern to you before you did your witness  
 18 statement?  
 19 A. Not before I did my witness statement.  
 20 Q. No. Has anyone pointed it out since?  
 21 A. So what I asked and I have seen is that the two TAs that  
 22 came in actually came in with the wrong signage on it,  
 23 so it actually came in and it decreased the stock rather  
 24 than increasing the stock and that's why the TC was sent  
 25 to correct that.

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1 Q. Yes, but what I'm asking about first is looking at the  
 2 underlying transactions to see what actually happens  
 3 first.  
 4 A. Yes.  
 5 Q. And trace the transaction through from the beginning,  
 6 not just look at the TA.  
 7 A. Yes.  
 8 Q. Now, it may not be that this is something you know about  
 9 or understand and that's a perfectly reasonable answer  
 10 to give to the court. You're not required to answer  
 11 questions you don't know.  
 12 A. Yes.  
 13 Q. So is this something that you yourself actually know  
 14 about, or has it come from other people who aren't here?  
 15 A. So my team are closer to this --  
 16 Q. I know.  
 17 A. -- but the working -- so the team do the working of it.  
 18 I have interrogated the information to see if I can see  
 19 exactly how that flows and on this what I can see is  
 20 that two lots of scratchcards, £10, came in and they  
 21 came in the wrong way and it has actually decreased  
 22 instead of increased, therefore they weren't -- they  
 23 weren't effectively remmed in, which is what the TA does  
 24 now, and when you look at the data you can see that  
 25 flowing through and what's happened in branch.

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1 Q. Well, let's have a look at it, what does actually happen  
 2 on 18 January and I will suggest something to you and  
 3 you tell his Lordship whether you can agree or disagree  
 4 with it.  
 5 Let's look at row 12983. We've got two positive 25s  
 6 there, do you see that?  
 7 A. Yes.  
 8 Q. And if one of the 25s should have been minus 25 he is  
 9 going to be actually 50 short, isn't he? Because  
 10 instead of recording the amount of stock he actually  
 11 should have had and cancelling out, he is going to end  
 12 up with a record which is 50 rather than zero and  
 13 therefore he is going to be 50 short, do you agree?  
 14 A. Right. What he had was minus though.  
 15 Q. Well, he's got two positive 25s there, hasn't he?  
 16 A. Yes.  
 17 Q. He has not got what we have seen elsewhere, minus  
 18 25/plus 25. So all I'm pointing out to you is on this  
 19 premise he is going to be 50 short, the different  
 20 between the 25s cancelling each other out and them both  
 21 being the same sign, the difference is not 25, it's 50,  
 22 isn't it?  
 23 A. Sorry, when you say 50 short, what do you mean, because  
 24 he has already got the scratchcards in the branch?  
 25 MR JUSTICE FRASER: Okay, let me just try and speed this up.

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1 I know what your evidence is in totality. What Mr Green  
 2 is doing is he is taking you through some steps.  
 3 A. Yes.  
 4 MR JUSTICE FRASER: Now, you might not agree with the steps,  
 5 which is why he is putting it as a premise, but his most  
 6 recent question was the other examples he had shown you  
 7 had a positive 25 and a negative 25 that had an overall  
 8 effect of zero.  
 9 A. Yes.  
 10 MR JUSTICE FRASER: Yes? And what he is putting to you  
 11 here, which is a hypothesis on his case, is that if one  
 12 of these should have been a minus 25, instead of the two  
 13 25s having a net effect of zero they would have an  
 14 effect of 50.  
 15 A. Okay.  
 16 MR JUSTICE FRASER: He is going to repeat the question  
 17 because I'm not going to put questions for him, but  
 18 that's what he is trying to do.  
 19 A. All right.  
 20 MR GREEN: So if that hypothesis is right, the difference is  
 21 that it will show an additional 50 of stock compared to  
 22 what it would have showed had it netted to zero?  
 23 A. I think so, yes.  
 24 Q. And he would then not have the artificially inflated  
 25 stock on this premise?

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1 A. Yes.  
 2 Q. And so he would be 50 short. Real life --  
 3 A. Yes.  
 4 Q. -- would fall short by 50?  
 5 A. Yes.  
 6 Q. And he would then regard himself as due a transaction  
 7 correction for 50 cards rather than for any other  
 8 number, yes?  
 9 A. For 50 cards?  
 10 Q. Yes.  
 11 A. Yes.  
 12 Q. On that premise?  
 13 A. Yes.  
 14 Q. And in the event that he reverses a transaction for 50  
 15 cards, his cards should go down by 50?  
 16 A. Yes.  
 17 Q. But his cash should go up by 50 correspondingly?  
 18 A. Yes.  
 19 Q. And so he would want, in fairness, a transaction  
 20 correction to increase his stock by 50 cards?  
 21 A. Yes. And reduce his cash.  
 22 Q. Yes. In fact the TC that he was sent increased his  
 23 stock by 100 cards, which caused a 50 card overshoot,  
 24 a 50 £10 card overshoot. He is therefore left £500  
 25 short on that premise, isn't he? If that's correct?

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1 A. Yes, but that's not -- so if I can just -- can I just  
 2 explain? So what he should have had was -- so it is two  
 3 25s, £500 worth. Effectively he has activated the  
 4 scratchcards and therefore what he should have had --  
 5 sorry. So if you just think about it before we did the  
 6 PING. So it is basically you activate your scratchcards  
 7 and you get the rem in so it balances. What came in was  
 8 actually the wrong way round so it didn't take the 500  
 9 to zero, it took it to a minus so it actually is 1,000  
 10 not 500 is the effect.  
 11 Q. But the difference he is complaining about is 500.  
 12 A. Yes, why -- okay, the difference is then -- so  
 13 Mr Latif's practice was to -- as soon as he activated  
 14 the scratchcards in his post office he would then buy  
 15 them -- sell them on to his retail. So what he would do  
 16 straight away is he would process a sale for £500.  
 17 That's what he would do and that was his practice and  
 18 that's quite -- a lot of people do that because it is  
 19 easier to keep the cash separate.  
 20 That would show as a sale on the information. Now,  
 21 what he has done in this case is when -- because he's  
 22 got negative stock figures, he couldn't balance with the  
 23 negative stock figures and then when they have looked  
 24 they can see that they've got negative stock figure on  
 25 the scratchcard, it's showing a minus. So they then

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1 reversed the sale of the 500 but actually they had never  
 2 sold them in the first place, so actually he had reduced  
 3 it. So what that means is actually the scratchcards  
 4 that were in the retail hadn't been paid for, so there's  
 5 actually £1,000 short is what the TC comes in should do  
 6 and that was correct.  
 7 Q. Well, let's look on the call logs, {F/1834.1}. If we  
 8 look at 25 January and we look at row 48. So row 48 is  
 9 10 August 2015 and you see there:  
 10 "We have received the wrong TAs for £5 cards."  
 11 That's what he is calling the helpline about  
 12 in August 2015?  
 13 A. Okay.  
 14 Q. Yes? And then if we go to row 56, 13 August 2015:  
 15 "Can PM has received TAs this morning and the office  
 16 has been charged for the free games."  
 17 You see that?  
 18 A. Yes.  
 19 Q. And then if we look at row 57, 14 August 2015, rollover  
 20 with discrepancy, yes? Caused by lottery TAs being  
 21 wrong. This happened quite a lot to him. Yes?  
 22 A. Yes.  
 23 Q. And then row 72, on 25 January 2016, rather than 2018,  
 24 he's got a duplicate lottery TC there as well.  
 25 A. Yes.

1 Q. Can you see that?  
 2 A. Mm-hm.  
 3 Q. So there's a history there of him having these duplicate  
 4 lottery problems and raising them and if we go to  
 5 row 171, 25 January 2018, do you see:  
 6 "TC received for ... £10 x 100 scratchcard  
 7 games ..."  
 8 And if we look at the top, he says:  
 9 "... only received 50 ... if we accept the TC, will  
 10 cause a discrepancy?"  
 11 A. It is right he had 50 but because of the way the TA was  
 12 sent, it was sent -- it is because it had the complete  
 13 opposite effect it actually went from being 500 to  
 14 1,000. So it didn't -- so whereas he should have booked  
 15 in 500, he booked in a minus 500 which is the effect of  
 16 £1,000. That is the difference.  
 17 Q. He is specifically complaining about the fact that the  
 18 TC that he has received is not to correct the 50, it's  
 19 to correct 100 and if he accepts it it will increase his  
 20 stock by 100 lots of £10 scratchcards. That's precisely  
 21 the discrepancy that he has complained about in his  
 22 witness statement, isn't it, £500?  
 23 A. But the value of the TC was 1,000 --  
 24 Q. Precisely --  
 25 A. -- which is what it should have been.

1 Q. -- so it overshoot by 500 on his case for the reasons we  
 2 have just outlined and put to you?  
 3 A. No, it didn't though. Because -- because of the way it  
 4 was -- sorry, I'm not explaining this obviously.  
 5 Because of the way it was booked in, instead of taking  
 6 it to a zero it took it to a minus, so it had the double  
 7 effect of that coming in, so he -- actually he only had  
 8 50 scratchcards, two packs of 25 and £10, only 50, but  
 9 because of the way it came in, instead of increasing it  
 10 decreased so basically instead of going from 500 to zero  
 11 it took it down again, so it's £1,000. And from what  
 12 you -- you know, there you say he's got a couple -- and  
 13 I have said it clearly is confusing for him in branch  
 14 because of the way that's happened and because of the  
 15 way he actually sells his stock to the retail and  
 16 because of the way they reversed that transaction, it  
 17 wouldn't be particularly easy to follow in branch, but  
 18 that TC was correct.  
 19 MR JUSTICE FRASER: Mr Green, I am entirely comfortable that  
 20 I can see the degree to which the call log either does  
 21 or doesn't match either Mr Latif's evidence or  
 22 Mrs van den Bogerd's understanding of that.  
 23 MR GREEN: I'm most grateful, my Lord. I was going to move  
 24 on anyway.  
 25 MR JUSTICE FRASER: There is nothing to be gained by

1 continuing.  
 2 MR GREEN: I'm grateful.  
 3 Would that be a convenient moment for a break,  
 4 my Lord?  
 5 MR JUSTICE FRASER: Yes. I do have to explore with you your  
 6 intended timings.  
 7 MR GREEN: My Lord, yes.  
 8 MR JUSTICE FRASER: You have the whole of this week but  
 9 you're not going to get any more time just because we  
 10 are going slower with one witness than you expected.  
 11 MR GREEN: No, we're not seeking in any and we're planning  
 12 on that basis.  
 13 MR JUSTICE FRASER: All right. Mrs van den Bogerd, we're  
 14 going to have a short break now. We will come back in  
 15 at 11.53. Thank you very much.  
 16 (11.45 am)  
 17 (Short Break)  
 18 (11.54 am)  
 19 MR GREEN: Mrs van den Bogerd, can we now look please at  
 20 paragraph 77 of your witness statement at {E2/5/20}.  
 21 Now, this was in fact a shortfall raised by you  
 22 rather than raised by Mr Tank, wasn't it?  
 23 A. Yes.  
 24 Q. So in a sense it's a slightly random one, it's not one  
 25 that he was specifically complaining about but it's one

1 that you identified as having occurred in December 2011  
 2 and you say that he contacted NBSC regarding the  
 3 shortfall , the call was made on the 13th:  
 4 "I understand from Post Office 's solicitors and  
 5 Fujitsu that this particular issue was resolved  
 6 following an investigation as PEAK PC0214226. It is  
 7 possible that Mr Tank contacted the banking team direct  
 8 (if he had their contact details ), but such calls are  
 9 not logged."  
 10 And the result of this is that he is repaid.  
 11 A. Yes.  
 12 Q. And you say at paragraph 87 you have described above at  
 13 paragraph 53:  
 14 "... the process which subpostmasters need to follow  
 15 when there is a system outage or power failure and,  
 16 providing this process is followed, Horizon will either  
 17 recover or cancel the transaction. The online banking  
 18 transaction which Mr Tank has described is a recoverable  
 19 transaction and therefore ..."  
 20 This is the important bit:  
 21 "... if the correct recovery process had been  
 22 properly followed in accordance with the Horizon Online  
 23 quick reference guide, a copy of which appears at [POL  
 24 number which you have now amended to the correct one],  
 25 the branch would not have sustained any shortfall ."

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1 So the point there is user error by Mr Tank; that's  
 2 the point you're making?  
 3 A. So -- no, the point here is that the -- well, there was  
 4 a user error from Mr Tank in that he gave all the  
 5 receipts to the customer.  
 6 Q. Sorry, say again?  
 7 A. In that he gave all the receipts to the customer, that  
 8 was his error, so he didn't have that information. But  
 9 in this -- so there's two things. In the case of  
 10 Mr Tank then what's happened in his situation is that  
 11 other than give the receipts, didn't do anything -- it  
 12 wasn't user error because the recovery failed and  
 13 actually --  
 14 Q. Yes.  
 15 A. Sorry. And what happened here was that the failed  
 16 recovery was then picked up by Fujitsu in the back end  
 17 that comes in to Post Office and then we generate the TC  
 18 to the branch, which is what actually did happen here.  
 19 Q. Well, let's see what actually did happen, I mean let's  
 20 just be very precise, because I'm going to suggest to  
 21 you that when anything happens because of Horizon, if  
 22 there is any user error by an SPM that happens at the  
 23 same time but is not causative, Post Office mentions  
 24 user error in a way that suggests it is causative.  
 25 Do you recognise that?

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1 A. In this situation , yes.  
 2 Q. Yes. And the fact is that any user error by Mr Tank was  
 3 not causative of the error that was generated?  
 4 A. No, it wasn't.  
 5 Q. And so when we re-read that part which I said was the  
 6 important bit at the top of page 21, you say:  
 7 "... therefore if the correct recovery process had  
 8 been properly followed in accordance with the  
 9 Horizon Online quick reference guide ... the branch  
 10 would not have sustained any shortfall ."  
 11 That's not correct, is it?  
 12 A. Not in this situation , no.  
 13 Q. No.  
 14 A. It was -- so in this situation it was the receipts ,  
 15 because on the receipts it actually does tell Mr Tank  
 16 what -- you know, what the situation -- what's happened.  
 17 Q. Well, let's take it in stages. Do you know what UEB is  
 18 as an acronym?  
 19 A. Sorry, U?  
 20 Q. UEB, have you ever heard of that?  
 21 A. No.  
 22 Q. User error bias?  
 23 A. No, I can't say --  
 24 Q. It is where people in IT constantly blame the user when  
 25 actually it is not their fault?

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1 A. Okay, I haven't heard that before.  
 2 Q. You haven't heard that?  
 3 A. No.  
 4 Q. Well, let's look at this because I'm suggesting to you  
 5 this is a common theme that runs through Post Office's  
 6 approach when these issues are raised. Is that a fair  
 7 suggestion?  
 8 A. I think what I have tried to explain is what the  
 9 approach is, in 99 out of 100 that would be the case.  
 10 In this situation it is slightly different .  
 11 Q. Well, it's slightly different in the sense that it is  
 12 not his fault and you have suggested that it is?  
 13 A. Right, well, I didn't intend to suggest it was  
 14 completely his fault . I mean him giving the receipts  
 15 back to the customer was user error and had he held onto  
 16 those he would have seen exactly ... but other than that  
 17 I mean he couldn't have done anything because it was  
 18 a failed recovery anyway and he did do what the receipts  
 19 will have told him which is to pay out, which is what he  
 20 did.  
 21 Q. He did what the receipts told him to do, didn't he?  
 22 A. To pay out. It was an authorised payment, yes.  
 23 Q. So when we follow it through -- I'm going to have to  
 24 take it reasonably speedily, stop me if there's anything  
 25 that you need more time on.

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1 A. Okay.  
 2 Q. But if we look at {F/870} we can see this is the PEAK  
 3 and if we go to page 2 please {F/870/2} and look at the  
 4 summary, do you see the second box down:  
 5 "The banking transaction had completed (A3 received  
 6 and authorised ...), including the receipt print ... and  
 7 money should have changed hands."  
 8 Yes?  
 9 A. Yes.  
 10 Q. So that's what Horizon would be directing him to do on  
 11 the receipt, wouldn't it?  
 12 A. That's correct.  
 13 Q. And that is what he did?  
 14 A. Yes.  
 15 Q. We then see:  
 16 "The disconnected session receipts show 'cash to  
 17 customer 195.04', so the customer's account should be  
 18 correct but the branch will have a shortage (for  
 19 a withdrawal) because the session hasn't been recorded."  
 20 A. That's correct.  
 21 Q. Can we pause there. Is this Horizon working as it  
 22 should?  
 23 A. In that it catches it in the back-end, then yes.  
 24 Q. And there's a reference to a further PEAK I need not  
 25 take you to it, but it's at {F/871.2} which shows us

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1 that there are in fact 492 failed recovery transactions  
 2 captured in that PEAK. Were you aware of that?  
 3 A. I wasn't aware of that number, no.  
 4 Q. Did anyone show you the KEL at {F/1700}? Can we look at  
 5 that please. And you can see the date of this KEL has  
 6 been -- it has been raised by Anne Chambers on  
 7 28 February 2010.  
 8 A. Yes.  
 9 Q. Did you know that there was a KEL relating to all this  
 10 that had been going on since 2010?  
 11 A. I wasn't aware.  
 12 Q. You weren't aware of that.  
 13 If we just go down please under "problem", just have  
 14 a look there, there's a paragraph underneath the  
 15 subparagraphs (a) to (e):  
 16 "If a T1 recovery request times out at the  
 17 counter ..."  
 18 Because timing out is a problem, isn't it?  
 19 A. It is if it is mid-transaction, yes.  
 20 Q. "... recovery is abandoned and no second attempt is made  
 21 to get the recovery information. This is as designed;  
 22 it was decided to keep recovery simple and not have too  
 23 many error paths. The priority is to get the user  
 24 working again, so in this sort of error path we just  
 25 mark the recovery as failed and leave it for SSC to sort

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1 out."  
 2 So it is designed into the system that in that  
 3 situation the SPM will have a discrepancy that they  
 4 can't figure out and has to be corrected by SSC; that's  
 5 the effect of it, isn't it?  
 6 A. When you say not figure out, the receipts which is -- as  
 7 Mrs Burke's evidence was, she had the receipts and she  
 8 could figure it out, but it would have a discrepancy,  
 9 absolutely.  
 10 Q. Well, they can't figure out why, when they have done  
 11 what the actual receipt, if they have kept it, tells  
 12 them to do, they have still got a discrepancy?  
 13 A. No, what I'm saying is when you say "figure out", it  
 14 would be -- as Mrs Burke's evidence was it was obvious  
 15 to her what that problem was because it didn't show on  
 16 the transaction log, so ...  
 17 Q. That's as designed anyway?  
 18 A. Yes, as designed, yes.  
 19 Q. Let's look please now if we may at the forum post which  
 20 relates to this. It's at {F/1257.1}. You see:  
 21 "Hi all,  
 22 "Some advice/help required.  
 23 "Yesterday during HOL failure [Horizon Online  
 24 failure] was in process of POCA card withdrawal.  
 25 Transaction seemed to go through okay apart from Horizon

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1 printing 3 identical receipts.  
 2 "Receipts showed a disconnected session with  
 3 recovery code.  
 4 "Receipts also showed CAWD limit [minus 195.04]  
 5 total due to the customer."  
 6 Et cetera, we have confirmed he is right about that?  
 7 A. Yes.  
 8 Q. We have seen it in the PEAK?  
 9 A. Yes.  
 10 Q. "Because receipts showed cash due to customer, we paid  
 11 out.  
 12 "Come evening balancing till showed approximately  
 13 £200 loss. Thought at time must be miscount and will  
 14 try to sort in morning.  
 15 "This morning produced transaction log for the  
 16 period of HOL failure. No record of 195.04 transaction  
 17 at all !!!!"  
 18 Yes?  
 19 A. Yes.  
 20 Q. That's because it is not recorded internally as  
 21 a transaction?  
 22 A. That's right.  
 23 Q. And it doesn't show up on the report that the  
 24 subpostmaster has access to?  
 25 A. No, it doesn't.

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1 Q. "Phoned helpline and was told by very irate member of  
 2 staff that loss is mine unless I can sort out with  
 3 customer directly ..."  
 4 In your experience is that the sort of typical  
 5 response in that situation?  
 6 A. No, and that's the wrong response clearly.  
 7 Q. It's wrong, but is it typical?  
 8 A. No, I don't recognise that. I mean if he has rung up  
 9 and said "I've got a disconnected session receipt" then  
 10 that should trigger a -- clearly not an irate member  
 11 anyway but it would trigger a different response.  
 12 Q. On a lot of these helpline records we see them say that  
 13 they read out the KBA in response.  
 14 A. Yes.  
 15 Q. That's the knowledge based article.  
 16 A. Yes.  
 17 Q. Another word for that is a script?  
 18 A. It would be where the information is, yes.  
 19 Q. Yes. So often the helpline are responding by reference  
 20 to something from the knowledge based article?  
 21 A. Yes. So rather than put the actual thing in they  
 22 actually refer to knowledge base, yes.  
 23 Q. Okay. Then after the brackets where he says "HAS ANYONE  
 24 SEEN THIS" in capitals, he says:  
 25 "Asked irate staff to pass call up as I was not

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1 a happy bunny, was told she was not going to do this,  
 2 only after I asked to speak to contracts manager or  
 3 somebody from POL press office with regards to speaking  
 4 to press about my loss was I given a number for  
 5 Chesterfield ."  
 6 Is that acceptable?  
 7 A. No.  
 8 Q. Is it typical?  
 9 A. No. I mean you would get the odd, you know, bad  
 10 experience, but that is not typical in my experience of  
 11 helpline staff .  
 12 Q. "So spoke to POCA lady at Chesterfield who after  
 13 pressing a few buttons was able to find transaction ..."  
 14 So it is clear that Post Office had access to  
 15 information that the SPM couldn't access; that's  
 16 correct, isn't it?  
 17 A. Would be having, yes. Yes.  
 18 Q. "She couldn't promise anything but will see if it she  
 19 can get a credit TC after she has spoken to Fujitsu????  
 20 She took my [number] and promised to call back after  
 21 speaking to Fujitsu, being very non-committal about the  
 22 possible loss."  
 23 If you go over the page {F/1257.1/2} he is asking  
 24 about what course of action and so forth .  
 25 Now, pausing there, it's clear that he faced

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1 a pretty serious headwind, didn't he, in trying to sort  
 2 that out?  
 3 A. From the response from the helpline, yes.  
 4 Q. Can we just look at page 6 please {F/1257.1/6}. The  
 5 second entry down:  
 6 "When I balanced on 17th ..."  
 7 This is not him, this is a different user on the  
 8 same forum:  
 9 "When I balanced on 17th September I had an  
 10 unexplained loss of £176.74. I paid it in rather than  
 11 go through to the stress of the hell line. It has not  
 12 come to light ."  
 13 Had you referred to the helpline as being called the  
 14 hell line? Had you heard of that?  
 15 A. I have heard of it, yes, I have.  
 16 Q. You have heard of it?  
 17 A. Yes.  
 18 Q. And you can understand why people faced with that sort  
 19 of response might take that view?  
 20 A. Well, given that I said it wasn't typical, I think for  
 21 £176 I would always ring, personally .  
 22 Q. So that tends to suggest that the person there had had  
 23 some pretty bad experiences if they weren't prepared to  
 24 follow that up, because it's quite a lot of money?  
 25 A. Well, yes, if they were happy to put £176 when they

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1 could have sought help with it ...  
 2 Q. Okay. Let's have a look very quickly please at the  
 3 helpline log at {F/1286.1}. Because as well as the  
 4 forum post we just looked at and his description of what  
 5 he did the very next day, we have what the helpline  
 6 recorded from his call at row 120. I'm sorry, on the  
 7 remedy tab, Ms Mackenzie has very helpfully reminded me.  
 8 Row 120.  
 9 Can we just go across please to the detailed  
 10 description:  
 11 "Called this morning about a Horizon failure  
 12 yesterday, branch completed a withdrawal and the 195.04  
 13 failed recovery receipt time ... recovery code ... card  
 14 account withdrawal limit ."  
 15 Just go across to the right please. You see  
 16 "Priority: low" in the incident log, do you see that?  
 17 A. Yes.  
 18 Q. Do you think that should be a low priority?  
 19 A. That's the classification on the remedy system, it  
 20 doesn't actually apply to that particular call, it's  
 21 just a hangover from the old system.  
 22 Q. What is that recording if not the priority to be  
 23 afforded to that incident?  
 24 A. So that would -- so my understanding of that is if it  
 25 was a robbery incident it would come as a high. It

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1 doesn't mean they're not taking that call seriously at  
 2 all.  
 3 Q. At the very lowest, we can see the detailed description  
 4 doesn't exactly reflect the conversation that took  
 5 place, does it, putting it mildly?  
 6 A. No, it's quite specific to the actual issue itself.  
 7 Q. It doesn't capture what helpline told him, what he had  
 8 to do to insist on trying to get a number for  
 9 Chesterfield, it doesn't capture any of that?  
 10 A. No, it has the detail of the failed recovery.  
 11 MR JUSTICE FRASER: Have you finished with this document?  
 12 MR GREEN: My Lord, yes.  
 13 MR JUSTICE FRASER: Can we just scroll to the left so I can  
 14 see the first row again please. Thank you.  
 15 MR GREEN: Can we now look please at the Horizon Online  
 16 quick reference guide that you have referred to at  
 17 paragraph 78 of your witness statement. It is at  
 18 {F/1365}. This is actually the 30 July 2015 one, but  
 19 this is the guide you would expect an SPM to look at,  
 20 yes.  
 21 A. Yes.  
 22 Q. And can you see the red box at the bottom?  
 23 A. Yes.  
 24 Q. "Total due to customer", yes?  
 25 A. Yes.

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1 Q. And it actually positively says:  
 2 "You must take care to only settle with the customer  
 3 for the amount specified on the receipt which is clearly  
 4 stated as the 'total due to/from customer'"  
 5 A. Yes.  
 6 Q. Where do we find there or at all a statement that "We  
 7 know there's a design fault recognised within Horizon  
 8 which may leave you puzzled when you give a customer  
 9 cash as you have been told to do in this paragraph but  
 10 actually the transaction has disappeared, please call  
 11 the helpline"? Where do we find something or anything  
 12 remotely about that?  
 13 A. It doesn't say here.  
 14 Q. It is not in there anywhere, is it?  
 15 A. No.  
 16 MR JUSTICE FRASER: I dare say that wasn't the most  
 17 difficult question that Mrs van den Bogerd had to  
 18 answer. That's really straying into ...  
 19 MR GREEN: My Lord, I'm sorry.  
 20 It had been a known issue since February 2010 at the  
 21 latest.  
 22 A. Okay.  
 23 Q. Let's move now if we may please, just going at some  
 24 speed, just in relation to the label transaction issues  
 25 that Mr Tank experienced. His evidence was that he

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1 couldn't use a spoiled label process because the guide  
 2 told him that he couldn't do so unless the label was on  
 3 hand.  
 4 A. Okay.  
 5 Q. And if it has not been printed out it's not going to be  
 6 on hand, is it?  
 7 A. No, but you can print a receipt, that's part of the  
 8 process, and claim on the receipt.  
 9 Q. Well, he had suffered repeated losses, become very  
 10 frustrated and if we look at {F/1399.1}, this is the  
 11 transcript of a meeting which he has with Mr Bridges and  
 12 when we go please to page 14 of that {F/1399.1/14}, he  
 13 explained openly about his use of official postage, he  
 14 said it was just a form of protest to get this meeting  
 15 and he is asked "So how many forms of protest do you  
 16 need to get a meeting?", "Well apparently it took all of  
 17 this, and however many years ..."  
 18 You were familiar, weren't you, with SPMs who got  
 19 very frustrated over issues they felt were not being  
 20 faced up to, getting frustrated they couldn't get  
 21 face-to-face meetings with people? He was not alone in  
 22 that, was he?  
 23 A. Well, I don't have great knowledge of it, but there  
 24 would be some instances where face-to-face would have,  
 25 in my view, resolved the situation much quicker. As in

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1 here he said it only took one call and they had the  
 2 meeting.  
 3 Q. Well, I haven't got time to deal with the long run-up to  
 4 that.  
 5 Let's look at page 16 {F/1399.1/16}. If you look  
 6 halfway down he says:  
 7 "I need some acknowledgement of the fact that there  
 8 is an issue. I received a letter back from KB saying  
 9 that there is, he has investigated it and there is  
 10 nothing to report. Could I see the results of your  
 11 investigation. I would like to see the screenshots of  
 12 the conversation that I had with various postmasters and  
 13 the business analyst from Post Office Limited on  
 14 Subspace."  
 15 Subspace was an area people could share their  
 16 concerns?  
 17 A. Yes.  
 18 Q. And Post Office withdrew it?  
 19 A. Yes.  
 20 Q. "So this is a known fault and when I see  
 21 Paula Reynolds ..."  
 22 It must be Vennells, because I think in the other  
 23 transcript we have it is Vennells.  
 24 A. Yes.  
 25 Q. "... when I see Paula [Vennells] standing in front of

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1 politicians saying there is no known fault with Horizon,  
 2 something gets my goat.”  
 3 This is typical of the frustration that you have  
 4 encountered from SPMs, isn't it?  
 5 A. In some instances, yes.  
 6 Q. Can we move on now please to the Patnys and I'm going to  
 7 have to take this slightly more speedily.  
 8 In relation to paragraph 62 of your witness  
 9 statement {E2/5/18}, the POL reference there, the  
 10 document that actually was referenced, was not the  
 11 helpline logs, it was the helpline service desk logs,  
 12 yes, which is a different document?  
 13 A. Yes.  
 14 Q. That's now been corrected in your corrections to the  
 15 correct POL reference 05114278. Indeed the document at  
 16 paragraph 63 has been corrected on Thursday of last week  
 17 to the correct number so that they match the documents  
 18 to which hyperlinks had been added on Opus.  
 19 Do you know how it was -- we have covered this  
 20 already at the last time of asking, but do you know how  
 21 it was that all these document references were to the  
 22 wrong things?  
 23 A. Sorry, I don't. I mean I had the information I used and  
 24 I didn't do the referencing myself, so I just apologise  
 25 for that.

1 Q. If we look at -- there was a request for cash  
 2 declarations made on 4 February 2019 which is at  
 3 {H/186}. I won't take you to it. And your solicitors  
 4 wrote back and said, on 11 February at {H/196}, that  
 5 they would be provided.  
 6 What we get at {F/1514.1}, if we can look at that,  
 7 wasn't disclosed until 7 March. Did you know about any  
 8 of those requests for documents that related to your  
 9 evidence in the background or not?  
 10 A. No, I haven't been involved in that.  
 11 Q. Could we just go into the properties of that document  
 12 please, "File" at the top. We see this document was  
 13 created on 1 March 2019 by somebody called  
 14 Andrew Keighley.  
 15 MR JUSTICE FRASER: "Properties" I think. You are being  
 16 asked to look at "Related dates" under "Properties" on  
 17 the right-hand side. Do you see? Have you got the  
 18 common screen?  
 19 A. Oh, sorry. Right, yes, sorry.  
 20 MR JUSTICE FRASER: It is an information block that is  
 21 attached to the file and it says "Properties" in the  
 22 right-hand corner. Do you see that?  
 23 A. Sorry, I was expecting a spreadsheet, sorry. Yes.  
 24 MR GREEN: Do you see it is created on 1 March 2019?  
 25 A. Yes.

1 Q. And the author is somebody called Andrew Keighley. Who  
 2 is he?  
 3 A. He works in the cash management part of the supply  
 4 chain.  
 5 Q. And Shirley Hailstones is someone who helped you with  
 6 your witness statement in November?  
 7 A. She is, yes, in my team, yes.  
 8 Q. So did you have this document, if we go back, or  
 9 a different document when you were looking at the  
 10 Patnys' situation?  
 11 A. I don't recall which date it was but certainly when  
 12 I looked at it I looked at the transaction log and the  
 13 event logs for this, but not all of this.  
 14 Q. I'm going to take -- Mrs van den Bogerd, you will  
 15 understand I'm just going to take this a bit more  
 16 speedily.  
 17 A. Yes.  
 18 Q. When you were dealing with the analysis of the Patnys'  
 19 situation in paragraph 66 {E2/5/18} and so forth --  
 20 A. Yes.  
 21 Q. -- you didn't mention stamps anywhere?  
 22 A. No.  
 23 Q. And you didn't mention calls to the NBSC?  
 24 A. No.  
 25 Q. Was there in he reason for that? They are pretty

1 prominent features of the case?  
 2 A. No, other than I said this was at a time where I put  
 3 this together, then I didn't have a huge amount of time  
 4 to put this together, but ...  
 5 Q. Okay. What we see in the call logs -- and I'm talking  
 6 about the logs we have I think already seen but they are  
 7 at {F/1509.1} if we could just look at those. You were  
 8 in court I think when you heard a positive allegation of  
 9 dishonesty being put to Mr Aakash Patny, weren't you?  
 10 A. Yes, I was.  
 11 Q. That he was inflating the stamps to conceal cash  
 12 deficit?  
 13 A. Yes, I was here, yes.  
 14 Q. But that's not an allegation that you suggested in your  
 15 witness statement?  
 16 A. No, I haven't.  
 17 Q. And the reason for that is you don't believe that's  
 18 necessarily what he was doing?  
 19 A. I didn't offer an opinion at all. What I was in this  
 20 looking to do was to try and look at what he said had  
 21 happened and look at what we could see from the data.  
 22 Now, what we can see is that the stamps are overdeclared  
 23 and that has a corresponding cash entry and there was  
 24 a loss beforehand, but I haven't gone further with any  
 25 other suggestion on this.

1 Q. Just pausing there, you will remember from his evidence  
 2 that you heard that he explained that when he called the  
 3 helpline they took him through some complicated steps to  
 4 try and sort it out. Do you remember that? Do you  
 5 remember that evidence?  
 6 A. Sorry, I don't actually. I thought it was when he spoke  
 7 to somebody in Chesterfield rather than the helpline.  
 8 Q. It may have been in Chesterfield. In any event he was  
 9 taken -- I think there are a number of occasions, but  
 10 the point is this, that the Credence report would show  
 11 the specific keystrokes by the operator in branch,  
 12 wouldn't they?  
 13 A. Yes.  
 14 Q. And so if one had wanted to get to the truth about what  
 15 keystrokes Mr Patny had pressed, one could have obtained  
 16 a Credence report to identify that and that would  
 17 have --  
 18 A. Have used a Credence report, yes.  
 19 Q. And that would have shown all the keystrokes pressed --  
 20 A. Yes.  
 21 Q. -- so you could follow exactly what he had done in  
 22 sequence?  
 23 A. Yes.  
 24 Q. And we can see at row 140 of this spreadsheet, if we go  
 25 across, you will see the £17,000 shortage. If you just

1 look at the top you can see that -- if we go to the  
 2 "Resolution" column which is to the right, and you look  
 3 at line 140, if you go to "Emailed ESG", just click on  
 4 that. Above can you see:  
 5 "Emailed ESG Thursday 26/05/2016 ... requesting  
 6 Credence report. Please see attached documents.  
 7 Advised office of Credence info office adamant stamps  
 8 are declaring themselves and overriding [his] figure.  
 9 Referred to IT if believes system issue."  
 10 So at that date it looks as if a Credence report  
 11 should have been requested, doesn't it?  
 12 A. Yes.  
 13 Q. And the Credence report would have shown the keystrokes?  
 14 A. Yes.  
 15 Q. And if Mr Patny had been dishonest, it would provide  
 16 powerful evidence of his dishonesty, wouldn't it, the  
 17 precise keystrokes entered?  
 18 A. Potentially, yes.  
 19 Q. And it is Mr Patny we see chasing up and repeatedly  
 20 requesting the Credence report in these logs?  
 21 A. Yes.  
 22 Q. It doesn't make any sense if he thinks he has been  
 23 dishonest, does it?  
 24 A. Well, he wants to see the information. I mean that's  
 25 what he is after, isn't he?

1 Q. Do you know why a Credence report would not be produced  
 2 in a situation like this?  
 3 A. So the Credence -- I mean it's actually not Credence in  
 4 here that's -- so there is some -- so, sorry, the NBSC  
 5 don't use Credence, they use Horace, which gives a --  
 6 Credence only goes back three months, Horace goes back  
 7 six months, which is better --  
 8 Q. But this is within --  
 9 A. So we don't normally produce either Credence or Horace  
 10 information for branches themselves because it would be  
 11 difficult for them to interpret the data, as you found  
 12 out looking at the different lines. But in terms of if  
 13 he has requested and we said we would produce then we  
 14 should have produced.  
 15 Q. If we look at row -- well, I need not take you to more  
 16 of it.  
 17 My Lord, I think I can deal with some of the  
 18 transaction issues in the spreadsheets in closings  
 19 without putting them to this witness.  
 20 Let's turn now to the MoneyGram issue, if we may,  
 21 paragraph 71 of your witness statement [E2/5/19]. Again  
 22 the POL reference was to event data not to transaction  
 23 data. If we go to the correct document which is  
 24 {F/1436.1} please, just trace this through if we may,  
 25 can we look at the sheet 1 and go please to row 1066.

1 Do you see that?  
 2 A. Yes.  
 3 Q. Do you know what those codes are?  
 4 A. Not off the top of my head, no. Other than "1" being  
 5 cash.  
 6 Q. So it appears when we compare this with the session data  
 7 we can see what they are, but can I just invite you to  
 8 look at those five lines from 1066.  
 9 A. So it's the MoneyGram for 3,100, yes, I see that.  
 10 Q. Yes, 3,100, 3,100. And if we look now -- you see how  
 11 many lines there are there that relate to -- appear to  
 12 relate to the MoneyGram transaction?  
 13 A. Yes.  
 14 Q. So we've got five transactions there in that run. 40170  
 15 is MoneyGram repeat send, just to get your eye in.  
 16 MR JUSTICE FRASER: Code 40170 is MoneyGram..?  
 17 MR GREEN: Repeat send.  
 18 MR JUSTICE FRASER: Yes.  
 19 MR GREEN: And if we look down you can see 40173 is  
 20 MoneyGram cancel. So you've got five lines there from  
 21 40170 down to 40173.  
 22 Can we look at the session data now please to match  
 23 that up, it's {F/1437.1}. If we go to row 4449 please.  
 24 23 February, if we just go across to the right very  
 25 slightly you will see here that we can now see from the

1 session data the item alongside the code: 40170. If we  
 2 click on the MoneyGram I think we can see above  
 3 "MoneyGram repeat send", and we come down one, we've got  
 4 "MoneyGram send classic" and then we've got underneath  
 5 it "Visa debit payment", underneath that we've got  
 6 "Cash" and then underneath that we've got "MoneyGram  
 7 cancel".  
 8 So we've got two transactions at 12.37 recorded, one  
 9 at 12.42 and two at 12.49. Do you see those?  
 10 A. Yes.  
 11 Q. How many session receipts would you expect to find in  
 12 the event data and for which entries?  
 13 A. I'm not sure.  
 14 Q. Let's look at the event data, {F/1435}. It is on the  
 15 sheet 1, sorry. And if we look at row 429, we have only  
 16 got four session receipts.  
 17 A. Okay.  
 18 Q. And if we just look at the time there, the first two are  
 19 the two transactions at 12.49, but there doesn't seem to  
 20 be a session receipt between 12.13, which is up above at  
 21 line 422, and 12.49. Do you know why there don't seem  
 22 to be any session receipts for the two lines we saw at  
 23 12.37 or the one we saw at 1.42?  
 24 A. Sorry, I don't know the answer.  
 25 Q. So paragraph 72 of your witness statement, if we go back

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1 to that please, it is {E2/5/19}, you have now amended  
 2 that paragraph, essentially deleting all the words  
 3 after -- well, from and including "Mr Patny says" in the  
 4 third line.  
 5 A. Yes.  
 6 Q. And the reason for that is because that's precisely what  
 7 we see when we look at the helpline advice, that he was  
 8 told to settle to cash and reverse and what he did was  
 9 settle to cash and not reverse at the time, but he says  
 10 he did so later at just after 7 o'clock in the evening,  
 11 yes?  
 12 A. He was told to cancel and reverse, yes.  
 13 Q. Has any of the evidence that I have taken you through  
 14 yesterday about the fact that this is in the week with  
 15 the PEAK latency --  
 16 A. Right.  
 17 Q. -- in relation to MoneyGram -- that massive spike in  
 18 latency, do you remember?  
 19 A. Mm-hm.  
 20 Q. And the fact that your account of what people were told  
 21 to do in terms of calling NBSC didn't actually apply to  
 22 Mr Patny because it came afterwards -- do you remember  
 23 yesterday?  
 24 A. The instruction you mean? Yes.  
 25 Q. Yes.

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1 A. Yes.  
 2 Q. The instruction was not to call NBSC at the time he did  
 3 it, was it?  
 4 A. No -- well, yes, just after it came out, yes.  
 5 Q. So it took place in the week with PEAK latency problems.  
 6 Duplication of transactions was a known issue in  
 7 relation to MoneyGram in that specific week. He did  
 8 precisely what the helpline told him in terms of  
 9 settling to cash and that's why he did it and Mr Patny  
 10 appeared to be worried about the polling time being  
 11 after 7 o'clock, in circumstances when we saw that  
 12 Post Office's internal documents didn't pick up the  
 13 disconnect and correct it between polling time for  
 14 MoneyGram and Post Office until more than a year after  
 15 this.  
 16 Now, does any of that cause you to reconsider your  
 17 view of what may have happened in Mr Patny's case with  
 18 his difficulties with an apparent duplication of £3,100?  
 19 A. Sorry, looking at the information that I have seen on  
 20 this, he did ring the helpline, so he did ring anyway.  
 21 Whether he had had the instruction or not, but he knew  
 22 he had a problem so he rang. I can see no evidence of  
 23 reversal there, which is why we issued the TC.  
 24 Q. And are you aware that reversals don't sometimes show up  
 25 in the data that's recorded by Post Office?

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1 A. So on -- well, we have issued a TC because he hadn't  
 2 reversed, which is why we have issued the TC. Had he  
 3 reversed and we had issued a TC, he would have had  
 4 a positive variance from that TC.  
 5 Q. Short point to you: I'm just asking you, he made the  
 6 point that he was actually doing his reversal that he  
 7 had forgotten to do at the time, he accepted that was  
 8 not right.  
 9 A. Yes.  
 10 Q. He makes the point that he attempted to do a reversal at  
 11 7.04 in the evening but that was after polling time.  
 12 A. Okay.  
 13 Q. You have seen that at the very time he encountered what  
 14 he believed was a doubling problem, internal documents  
 15 show that that was a recognised feature of the latency  
 16 issues which were at their peak in that very week.  
 17 A. Okay.  
 18 Q. Does that cause you to reappraise the likelihood of him  
 19 being at fault in the way you have suggested?  
 20 A. Well, I think at the time if we were aware of that we  
 21 should have looked into that for him when he has rung  
 22 into the helpline, if we were aware of that at the time.  
 23 Q. No one told him, "Mr Patny, in fairness to you this is  
 24 a system-wide problem which is peaking this week", did  
 25 they?

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1 A. No.  
 2 Q. It's fair to say that Post Office is not very  
 3 forthcoming about the problems that are being  
 4 experienced more widely when SPMs ring up the helpline?  
 5 A. Had -- so when there is a problem the helpline clearly  
 6 are aware there's a problem because they get inundated  
 7 with calls , so they are aware when there's a problem and  
 8 usually what happens is that if there's a problem they  
 9 will say "We are aware of it and we will come back to  
 10 you" which is some of the evidence we have heard around  
 11 some of the -- so the issue we had on 9 May for  
 12 instance, we heard about that. So they were aware of it  
 13 and they will say. So at the time if there was an  
 14 issue, it should have been -- that should have been  
 15 taken into account, yes.  
 16 Q. Do you accept that Post Office suffers from user error  
 17 bias in the way that it meets concerns raised by SPMs?  
 18 A. In some instances, yes, I do.  
 19 Q. Can we look please at an example at {F/1687.1}. This is  
 20 Mrs Burke, who we now accept was not at fault for  
 21 causing the problem that she experienced, yes?  
 22 A. Yes.  
 23 Q. Can you look please at row 5. You will see there's a TC  
 24 issued. Can we click in the text for that please. What  
 25 she is told is:

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1 "To correct communications failure on 9.5.16 for in  
 2 pounds 150 ... so credit to office . Financial services  
 3 enquiry team ..."  
 4 See what's said at the end there:  
 5 "Please be careful when entering transactions."  
 6 A. Yes.  
 7 Q. Does that reflect a fair assessment of the cause of that  
 8 problem that she encountered?  
 9 A. No, that's referring to the TC I think there. It was  
 10 when you put the TC through.  
 11 Q. She receives that as a description of the TC correcting  
 12 what's gone wrong, which is nothing to do with her.  
 13 A. Okay, right .  
 14 Q. And it says at the end of it "Please be careful when  
 15 entering transactions".  
 16 A. Which is just a standard line on TCs I think. It's not  
 17 referring -- what I'm reading from that it's not  
 18 referring to Mrs Burke that she needs to be careful.  
 19 Q. I'm grateful .  
 20 My Lord, unless your Lordship has any questions,  
 21 I have no further --  
 22 MR JUSTICE FRASER: Mr De Garr Robinson might have some  
 23 re-examination. I've got a couple of questions but  
 24 I will leave --  
 25 MR DE GARR ROBINSON: My Lord, I have a number of questions.

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1 MR JUSTICE FRASER: I thought you might.  
 2 Re-examination by MR DE GARR ROBINSON  
 3 MR DE GARR ROBINSON: Mrs van den Bogerd, I would like to  
 4 talk about MoneyGram first because my learned friend has  
 5 just put to you that the very week that this MoneyGram  
 6 problem arose there was a known issue about duplicated  
 7 MoneyGram transactions and it was put to you on the  
 8 basis that what was being experienced in branch  
 9 reflected the known problem and I would like to  
 10 investigate that with you if I may.  
 11 If we could go please to {F/1555}. You were shown  
 12 this by Mr Green yesterday. Do you recall seeing it?  
 13 A. Yes.  
 14 Q. And could you just describe what this document is?  
 15 A. So it's a change request -- well, a pricing document for  
 16 work to make a change request.  
 17 Q. So some work is being done and it is to sort out  
 18 a problem, isn't it?  
 19 A. Yes.  
 20 Q. And if I could ask you to go just about halfway down the  
 21 page underneath "Background" -- I will read it out to  
 22 you:  
 23 "MoneyGram summary.  
 24 "For the last several months Post Office has  
 25 experienced a live operational issue with MoneyGram

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1 transactions across the branch network. In the event of  
 2 a transaction timing out at the counter, a system error  
 3 message is displayed to the user (error code 84) and the  
 4 transaction is aborted. This leaves no record of the  
 5 transaction at the counter and the transaction and funds  
 6 may or may not have been committed to the MoneyGram  
 7 domain."  
 8 If this problem arose in a particular branch, what  
 9 impact would the MoneyGram transaction have had in the  
 10 branch's accounts?  
 11 A. It depends what stage of the transaction it would be.  
 12 So if it had committed and it left no transaction record  
 13 then it would be having a discrepancy.  
 14 Q. So -- let me just see if it ... well, let me just --  
 15 A. It depends. If the transaction is aborted before it is  
 16 actually registered then it would have no impact at all .  
 17 Q. Thank you.  
 18 A. It depends on, as I say, what stage of the transaction  
 19 it would be at.  
 20 Q. But the description -- I'm just asking you about the  
 21 effect of the description that's here, I'm not asking  
 22 you about anything else .  
 23 A. Okay.  
 24 Q. And it says that the problem involves the transaction  
 25 being aborted.

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1 A. Yes.  
 2 Q. And there being no record of the transaction at the  
 3 counter.  
 4 A. Yes.  
 5 Q. And my question to you is what impact does that have on  
 6 the branch's accounts?  
 7 A. In this instance it should have none at all.  
 8 Q. No impact, okay.  
 9 MR JUSTICE FRASER: When you mean "this instance" do you  
 10 mean this specific one --  
 11 A. Because this is a particular -- sorry.  
 12 MR JUSTICE FRASER: Well, it goes on to say "the  
 13 transactional funds may or may not have been committed  
 14 in the domain".  
 15 A. Yes, and the point is -- reading the first error code my  
 16 understanding of this is -- and that transaction is  
 17 aborted, it would have no impact at all because it would  
 18 have been cancelled mid-air almost.  
 19 MR JUSTICE FRASER: Understood.  
 20 A. If a transaction had already been committed then unless  
 21 it was cancelled and reversed, as we have been  
 22 discussing, then it would almost have been as if it had  
 23 been paid out, so that would have been an issue.  
 24 MR JUSTICE FRASER: That's what I understood the case to be.  
 25 MR DE GARR ROBINSON: Well, what I'm seeking to explore with

1 you, Mrs van den Bogerd, is first of all what happens  
 2 with the branch accounts and secondly what happens with  
 3 MoneyGram in accordance with the description here.  
 4 A. Yes.  
 5 Q. It says:  
 6 "... funds may or may not have been committed in the  
 7 MoneyGram domain."  
 8 So what would happen to the MoneyGram accounts if  
 9 funds had been committed to the MoneyGram domain?  
 10 A. Sorry, can you repeat that?  
 11 Q. We have a transaction done at branch which is aborted.  
 12 A. Yes.  
 13 Q. And we have no record of the transaction at the counter.  
 14 A. Yes.  
 15 Q. But we have funds being committed in the MoneyGram  
 16 domain.  
 17 A. Right.  
 18 Q. So we have two sets of accounts here, don't we?  
 19 A. Yes.  
 20 Q. We have the branch accounts?  
 21 A. Yes.  
 22 Q. And we have the MoneyGram accounts?  
 23 A. Yes.  
 24 Q. In the scenario where funds have been committed in the  
 25 MoneyGram domain, what happens to the MoneyGram

1 accounts?  
 2 A. So that would align with Post Office but there's  
 3 back-end reconciliation not the front end.  
 4 Q. I'm sorry, but could you just focus on my question.  
 5 A. Sorry, okay.  
 6 Q. We've got the branch's accounts setting out what the  
 7 branch's position is by reference to its transactions  
 8 and then we've got MoneyGram's account setting out what  
 9 their position is by reference to the transactions they  
 10 are aware of.  
 11 A. Yes.  
 12 Q. Now, in the scenario that's described here, where funds  
 13 have been committed in the MoneyGram domain, what would  
 14 the MoneyGram accounts be showing?  
 15 A. If it has been committed they would be saying it has  
 16 actually been transacted.  
 17 Q. Okay, so the MoneyGram accounts would show  
 18 a transaction --  
 19 A. Yes.  
 20 Q. -- involving the branch.  
 21 A. Yes.  
 22 Q. But going back to the branch accounts, would the branch  
 23 accounts show that transaction?  
 24 A. From reading this then no.  
 25 Q. Right. So there would be a discrepancy, there would be

1 a --  
 2 A. Yes.  
 3 Q. -- failure to reconcile, would there --  
 4 A. Yes.  
 5 Q. -- between the branch system, which means Post Office --  
 6 A. Yes.  
 7 Q. -- and MoneyGram, is that right?  
 8 A. That's right.  
 9 Q. Thank you.  
 10 If we could then go on to {F/1502} please. Do you  
 11 remember Mr Green took you to this, do you remember  
 12 seeing this yesterday?  
 13 A. I do, yes.  
 14 Q. If I could move on to page 29 of that document  
 15 {F/1502/29} you will see it is headed "Latency  
 16 resolution plan" and I recall Mr Green taking you  
 17 straight down to the bottom entry, "Reconciliation",  
 18 "Duplicate transactions are created ..." and as  
 19 I understand it what he is saying is that's precisely  
 20 the kind of duplicate transaction that may have happened  
 21 in this particular case that we have been talking about.  
 22 But if we look at the row headed "Reconciliation" it  
 23 says:  
 24 "Duplicate transactions are created in MG systems as  
 25 a result of the Post Office timeouts."

1 A. Yes.  
 2 Q. Now, what does "MG systems" mean?  
 3 A. That's MoneyGram.  
 4 Q. So could you explain what's actually happening in this  
 5 when these transactions are being duplicated?  
 6 A. So that's registered in MoneyGram as if they have been  
 7 transacted.  
 8 Q. So in whose system is the duplicate transaction being  
 9 created?  
 10 A. In MoneyGram's.  
 11 Q. Is there any description, any suggestion that there's  
 12 a duplicate transaction being created in a branch's  
 13 account?  
 14 A. Not from this, no.  
 15 Q. Thank you.  
 16 Mr Green this morning mentioned two bugs,  
 17 Dalmellington and Callendar Square, and that's in the  
 18 context -- do you remember which witness this was in the  
 19 context of? I'm afraid I don't.  
 20 A. It was the transfers. It was Latif.  
 21 Q. It is Mr Latif, I'm so sorry. I'm being rather scatty.  
 22 My learned friend put to you that you should have  
 23 borne in mind -- he asked you whether you had and  
 24 I think sought to suggest that you should have borne in  
 25 mind two particular bugs, the Dalmellington bug and the

1 Callendar Square bug. I would like to ask you about the  
 2 Dalmellington bug first. Could I ask you to go to  
 3 {F/1426}. This is a document which I suspect you have  
 4 never seen before, but -- why don't I ask you to read  
 5 the document. It is a KEL, it's a Fujitsu KEL relating  
 6 to the Dalmellington bug. Might you have seen this  
 7 before?  
 8 A. Not in this format, no.  
 9 Q. Okay, well, then I will give you a few minutes to read  
 10 it.  
 11 (Pause).  
 12 A. Okay.  
 13 Q. Now, when you were asked about Dalmellington I think  
 14 Mr Green suggested to you that this should have been in  
 15 your mind as a possible explanation for what was  
 16 experienced by Mr Latif and you answered him by saying  
 17 "Well, no this related to an outreach branch". Did  
 18 Mr Latif's branch involve any outreach element?  
 19 A. No.  
 20 Q. So was this a bug that in fact could have affected  
 21 Mr Latif's branch?  
 22 A. No, no. So this refers to rem in and out process. We  
 23 were talking about -- Mr Latif was transfers in and out  
 24 which is within branch, so this -- so my understanding  
 25 of this is this is an outreach only issue, not other

1 branches.  
 2 Q. So in your view does it have any relevance --  
 3 A. No.  
 4 Q. -- to the problem that was experienced by Mr Latif?  
 5 A. No, it has no relevance at all.  
 6 Q. And let's just talk about the symptoms as well. Do you  
 7 recall what the symptom is, the problem that was created  
 8 by the Dalmellington bug, if we can call it that?  
 9 A. So this was when it was booked out from the core and  
 10 been booked in by the outreach and there would be -- it  
 11 was to do with a button press, they were able to enter  
 12 the button again and that was doubling it.  
 13 Q. So what's happening is that we have money coming out  
 14 from the main branch stock unit and going into the  
 15 outreach stock unit.  
 16 A. Yes.  
 17 Q. And what you're suggesting is that the result of the  
 18 Dalmellington bug was that too much would go into the  
 19 stock unit --  
 20 A. Yes.  
 21 Q. -- the outreach stock unit, is that right?  
 22 A. Yes.  
 23 Q. In your view does that bear any similarity to the  
 24 problem that Mr Latif says he experienced in relation to  
 25 not being able to transfer money into --

1 A. No.  
 2 Q. -- the stock unit?  
 3 A. Mr Latif said that when he transferred from one to the  
 4 other the transfer in wasn't displaying at all and  
 5 therefore he reversed, is what he said, so this is very  
 6 different to this.  
 7 Q. It's very different. So in your view is the  
 8 Dalmellington bug something that should have been borne  
 9 actively in mind when you were addressing Mr Latif's  
 10 data and what happened in his branch?  
 11 A. No.  
 12 Q. Thank you.  
 13 Now, Callendar Square, it was also put to you that  
 14 you should have borne Callendar Square in mind. Are you  
 15 familiar with the Callendar Square bug?  
 16 A. I have forgotten the details exactly of Callendar Square  
 17 actually.  
 18 Q. Let me remind you. If we could go to D2 tab 4 please,  
 19 page 20 {D2/4/20}. This is Mr Coyne's report and  
 20 I would just like you to read paragraph 3.34 of his  
 21 report please, Mrs van den Bogerd.  
 22 (Pause).  
 23 A. Okay.  
 24 Q. You will see the year of the bug, it was in 2005 and  
 25 fixed in March 2006.

1 A. Yes.  
 2 Q. Do you recall the year that Mr Latif suffered his  
 3 problem?  
 4 A. Exactly no, but it was later than that. Sorry, I would  
 5 have to refer to my statement.  
 6 Q. Yes, why don't we. Your statement doesn't actually --  
 7 the months you look at are June, July and August 2015.  
 8 A. That's right, yes. Sorry.  
 9 Q. So this is a bug that happened beforehand and Mr Coyne  
 10 says that it occurred in Legacy Horizon and he refers to  
 11 a data communication error in Riposte. Now, when  
 12 Mr Latif suffered his problem was he using  
 13 Legacy Horizon?  
 14 A. No.  
 15 Q. And this may be beyond your expertise and if it is  
 16 please tell me, but as far as you are aware does  
 17 Horizon Online, the system that Mr Latif was using, use  
 18 the Riposte system?  
 19 A. I don't think it does, but that would be beyond me.  
 20 Q. Very good. But bearing in mind the year and the system  
 21 on which this bug occurred, do you feel that you should  
 22 have actively borne in mind the possibility that  
 23 Mr Latif's problem was caused by the Callendar Square  
 24 bug?  
 25 A. No.

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1 Q. Thank you.  
 2 Now, you were asked some questions about Mr Tank and  
 3 in particular on a number of occasions you said Mr Tank  
 4 should have kept the disconnected session receipt.  
 5 Do you remember that?  
 6 A. Yes.  
 7 Q. Now, why -- I'm not criticising Mr Green here but why do  
 8 you think that's significant? What difference would it  
 9 have made if Mr Tank had had the receipt?  
 10 A. Because that -- 1, it tells the postmaster what to do in  
 11 that particular situation, whether to give cash to or  
 12 take cash from, and that helps him identify then -- so  
 13 for instance in this situation if the transaction is  
 14 missing then he would be able to use that receipt to be  
 15 able to identify that as well, so he's got much better  
 16 position of what's happened in his branch.  
 17 Q. And with the benefit of that receipt, when a postmaster  
 18 phones into the helpline with a problem with his  
 19 accounts, does that assist the process --  
 20 A. Yes.  
 21 Q. -- the fact that there is a receipt? Perhaps you could  
 22 explain why that is so?  
 23 A. So ringing into the helpline to say that "I have an  
 24 issue, I have a disconnected receipt, a recovery  
 25 receipt", whatever the situation is, that's very

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1 different to saying "I have a discrepancy of £200" --  
 2 195 in this instance -- "and I don't know what it is",  
 3 it's a very different scenario and the helpline will  
 4 respond differently to that.  
 5 Q. Very good, thank you.  
 6 Now I would like to ask you about quite a lengthy  
 7 correction regarding the Helen Rose report. Do you  
 8 remember the Helen Rose report?  
 9 A. Yes, I do, yes.  
 10 Q. The report is at {F/1082}. If we could look at page 1  
 11 of that report {F/1082/2}, at the bottom of the page you  
 12 will see that -- well, from halfway down it is headed  
 13 "Questions asked and extracts from various emails in  
 14 response". It is worth remembering that this was sent  
 15 on 12 June and so what is contained below that  
 16 heading -- perhaps I can ask you: what do you think --  
 17 the text in blue -- the text in black and the text in  
 18 blue, what do you think that represents?  
 19 A. That was the response from Gareth Jenkins to the -- so  
 20 I think what Helen has done is just cut and pasted that  
 21 into this document.  
 22 Q. I see. So it would have been various emails that were  
 23 written -- exchanges of emails that were written leading  
 24 up to 12 June, is that right?  
 25 A. Yes, and you can see that she has referenced the email

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1 at the bottom there. 30 January 2013.  
 2 Q. So it's quite a long time, that's quite an early email,  
 3 isn't it, it's six months before this report was  
 4 written?  
 5 A. Yes.  
 6 Q. And if we look at that paragraph -- well, if we look at  
 7 the previous paragraph, this is Mr Jenkins, he says  
 8 about halfway down:  
 9 "The fact that there is no indication of such  
 10 a receipt in the events table suggests the counter may  
 11 have been rebooted and so perhaps may have crashed in  
 12 which case the clerk may not have been told exactly what  
 13 to do."  
 14 So there he appears to be suggesting that there was  
 15 no receipt?  
 16 A. Yes.  
 17 Q. And it was put to you that there was no receipt and you  
 18 resisted that suggestion?  
 19 A. Yes.  
 20 Q. But it was put to you on the basis of this document that  
 21 there was no receipt. Could we just go to the second  
 22 page of this document -- it is the third page, isn't it,  
 23 I see {F/1082/3}. In the second paragraph down it says:  
 24 "The files ... are part of the standard ARQ  
 25 returned. Rows 141 to 143 ... clearly show a reversal.

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1 Also row 70 ... shows that session 537803 ... has been  
 2 recovered and this event has the same time stamp as the  
 3 reversal session. Also row 71 of events ... shows that  
 4 a receipt was generated from the session 537805 (not  
 5 explicitly , but it was the only session at that time).”  
 6 So you didn’t have an opportunity to look at this in  
 7 the context of what was being suggested by my learned  
 8 friend --  
 9 A. Yes.  
 10 Q. -- but now that you have seen this email, or the quote  
 11 from this email which I apprehend is a later email, what  
 12 would your reaction be to the suggestion that this  
 13 document indicates that no receipt was actually  
 14 produced?  
 15 A. That does say that receipt was produced.  
 16 Q. Thank you.  
 17 MR JUSTICE FRASER: Do you want to stop and revisit it at  
 18 2 o’clock?  
 19 MR DE GARR ROBINSON: My Lord, yes please.  
 20 MR JUSTICE FRASER: I’m afraid you’re going to have to come  
 21 back. We will stop until 2.  
 22 Now, Mr De Garr Robinson, as you will have noted  
 23 from my approach to Mr Green last week in terms of  
 24 re-examination, it has to be kept within a narrow  
 25 compass. I know Mrs van den Bogerd is a very important

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1 witness so I’m not cutting you short on your  
 2 re-examination, but just bear that in mind.  
 3 MR DE GARR ROBINSON: I will endeavour to ensure it is not  
 4 lengthy, my Lord.  
 5 MR JUSTICE FRASER: 2 o’clock. Thank you very much.  
 6 (1.00 pm)  
 7 (The luncheon adjournment)  
 8 (2.00 pm)  
 9 MR DE GARR ROBINSON: Mrs van den Bogerd, we were looking at  
 10 the Helen Rose report and I just have a few more  
 11 questions about that. The reference is {F/1082}. If we  
 12 could look at -- it may be the second page but it is the  
 13 first page of the text {F/1082/2}. At the bottom of the  
 14 page you will see there are these three paragraphs which  
 15 are pale blue which are copied and pasted from some  
 16 earlier Gareth Jenkins email. He says in the first  
 17 paragraph that:  
 18 “This shows that session 537803 was successfully  
 19 saved to the BRDB, but when the user JAR001 logged on  
 20 again recovery reversed the session in session 537805.”  
 21 And in relation to that it was put to you and you  
 22 fairly accepted when you were being examined by Mr Green  
 23 that it was Horizon that caused the reversal of the  
 24 session.  
 25 Could you explain what’s meant by recovery reversed

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1 the session; could you explain what that means? That’s  
 2 a slightly open question but I have to ask you open  
 3 questions.  
 4 A. It means that the recovery process itself , what’s  
 5 triggered as a result of the loss of connectivity here  
 6 then actually reversed that transaction and that was  
 7 triggered by the postmaster logging on after the system  
 8 had come back up.  
 9 Q. So it was the postmaster logging on --  
 10 A. Yes.  
 11 Q. -- that was the start of the process but it was then  
 12 recovery which when faced with the postmaster logging on  
 13 caused the transaction to be reversed, is that right?  
 14 A. That’s right .  
 15 Q. Then in the third paragraph down:  
 16 “The reversal was due to recovery ... so this was  
 17 not a explicit reversal by the clerk.”  
 18 It may be that you don’t, but do you know what  
 19 Mr Jenkins means when he says ”explicit reversal by the  
 20 clerk”?  
 21 A. What he means is that the, it would be the postmaster in  
 22 this instance, didn’t actually go in and do a reversal  
 23 himself, so he didn’t actually go and look for the  
 24 session number to do the reversal.  
 25 Q. I see. Now, when you were asked some questions about

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1 this document you referred to an email.  
 2 A. Yes.  
 3 Q. And it might be that I know the email you were referring  
 4 to. Could I ask you to go please to {F/1095.1}. I will  
 5 just give you a minute or two just to familiarise  
 6 yourself with that document.  
 7 A. That’s right , yes.  
 8 (Pause).  
 9 Yes, I do recall the email.  
 10 Q. Right. If one goes halfway down this page you will see  
 11 it is an email chain but there’s an email there from  
 12 John Armstrong to Ron Warmington. Can you tell me  
 13 John Armstrong was?  
 14 A. He is the postmaster at Lepton.  
 15 Q. And who is Ron Warmington?  
 16 A. He is one of the directors at Second Sight.  
 17 Q. If we could go now to page 6 of that document  
 18 {F/1095.1/6}, this is an email from Mr Warmington to  
 19 Mr Armstrong and it is dated 25 June, so this is nearly  
 20 two weeks after the Helen Rose report, just so we can  
 21 locate ourselves in the chronology, and Mr Warmington  
 22 from Second Sight says:  
 23 “John, as I mentioned we are including your incident  
 24 in our interim report to be delivered to MPs on July 8.  
 25 It’s one of only four spot reviews that we are at this

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1 stage disclosing.”  
 2 Can you explain what a spot review is?  
 3 A. It was terminology that Second Sight used for a deep  
 4 dive into an issue that had been raised, so they  
 5 investigated an issue and they termed it a spot review.  
 6 Q. I see. And if we go on to the next paragraph:  
 7 “Here is what we have in the report on your  
 8 incident. If you see anything at all here that needs to  
 9 be corrected, or could be improved in any way, please  
 10 let me know and I’ll change it.”  
 11 Then there’s some text I need not take you to and  
 12 then going down to below the next paragraph he says  
 13 “Report extract follows here” and if you could read the  
 14 bottom of that page and then the top of page 7  
 15 {F/1095.1/7}. You can tell us when you get to the  
 16 bottom of the page.  
 17 A. Under “SR001”, from there, is that where you mean?  
 18 Q. And then when you get to the bottom tell us and we will  
 19 go on to page 7.  
 20 A. Yes, turn the page please.  
 21 (Pause).  
 22 Okay so the bottom of that paragraph, yes?  
 23 Q. Okay. And then we have “SR001 summary of POL’s  
 24 response” and then we have:  
 25 “POL’s 10-page response asserts that the Spot

1 Review:  
 2 “Does not demonstrate any failing in Horizon.  
 3  
 4 “ Principally asks whether a SPMR will be properly  
 5 notified about automatic reversals of transactions when  
 6 Horizon is unable to connect to the data Centre.”  
 7 And then I don’t need to take you to the next  
 8 paragraph but in the next paragraph but one says:  
 9 “POL further asserts in its response that the root  
 10 cause of the difficulties suffered by the SPMR was his  
 11 failure to follow the on screen and printed instructions  
 12 given by Horizon. POL claimed to be confident that the  
 13 SPMR knew that some transactions had been automatically  
 14 reversed because ...”  
 15 First :  
 16 “The branch had been suffering connectivity issues  
 17 in the run-up to the incident in question ...”  
 18 Do you see that?  
 19 A. Yes.  
 20 Q. And then if we go over the page {F/1095.1/8}, second:  
 21 “When the transactions in question first failed to  
 22 be processed (because Horizon could not get a response  
 23 from the data centre), Horizon asked the SPMR whether he  
 24 wished to cancel or retry the transactions, in response  
 25 to which the SPMR opted to retry the transactions ...”

1 Next:  
 2 “When the transactions failed again, the SPMR opted  
 3 to cancel the transactions .  
 4 “Horizon then automatically disconnected and printed  
 5 a ‘disconnect’ receipt that showed the transactions that  
 6 had been automatically reversed.”  
 7 Next:  
 8 “A standard customer receipt was not produced and  
 9 POL asserts that this should have told the SPMR that the  
 10 full transaction had not proceeded.”  
 11 And:  
 12 “Following the disconnect the SPMR was required to  
 13 log back on to Horizon and duly did so.”  
 14 And:  
 15 “Following the log on, and as part of the standard  
 16 recovery process, Horizon printed a ‘recovery’ receipt  
 17 which again showed the transactions that had been  
 18 reversed and those that had been recovered.”  
 19 Now, does that refresh your memory as to why you  
 20 said you had separate knowledge as to whether or not  
 21 Mr Armstrong received a ..?  
 22 A. Yes.  
 23 Q. I see. Let’s move back to page 6 {F/1095.1/6}. This is  
 24 the beginning of the same email we looked at and we read  
 25 the first big paragraph of the email. I would like to

1 read the second paragraph now:  
 2 “Ian and I ...”  
 3 I take it that’s Mr Henderson?  
 4 A. That’s correct.  
 5 Q. “... are particularly interested to know whether you  
 6 received the printed disconnect and recovery ‘receipts’  
 7 that POL refers to in its response ...”  
 8 So there’s the question that Mr Warmington asks  
 9 Mr Armstrong and Mr Armstrong’s reply is at page 4  
 10 {F/1095.1/4} and can I ask you please,  
 11 Mrs van den Bogerd, just to read the email of Tuesday  
 12 25 June from the middle of the page downwards and then  
 13 when you’ve got to the bottom tell us and I will ask you  
 14 to read half of the next page.  
 15 (Pause).  
 16 A. Yes, I have read that.  
 17 (Pause).  
 18 Yes.  
 19 Q. Let me know when you are done?  
 20 A. Sorry, I’m done.  
 21 Q. You’re done?  
 22 A. Yes.  
 23 Q. Now, first of all -- I hope this is uncontroversial --  
 24 what Mr Armstrong seems to be saying there is that he  
 25 did receive some disconnected session receipts .

1 A. Yes.  
 2 Q. What would the fact of receiving these disconnected  
 3 session receipts have told him?  
 4 A. It would have told him that the BT bill hadn't actually  
 5 been processed.  
 6 Q. So we now have more information than Mr Jenkins had in  
 7 the emails that are attached or rather quoted in the  
 8 Helen Rose report. If we could go to page 3 of this  
 9 document please {F/1095.1/3}, this is the second page of  
 10 an email from Mr Baker from the Post Office,  
 11 Simon Baker. Do you know who Simon Baker is?  
 12 A. He was a project manager at the time.  
 13 Q. I see. You will see at the top of the page it says  
 14 "Regards, Simon" so it is the end of his email but we  
 15 have Gareth's comments below, that's Mr Jenkins'  
 16 comments. There's a reference to GMT and British Summer  
 17 Time, this is because the logs used GMT even though BST  
 18 is in fact in force.  
 19 Could I ask you please to read paragraphs 1 through  
 20 to 9.  
 21 (Pause).  
 22 A. Yes, I have finished.  
 23 Q. You will see at the bottom in paragraph 9 Mr Jenkins  
 24 says:  
 25 "Therefore a message asking for a retry or cancel

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1 would have been shown at about 09.36.25. At this point  
 2 'cancel' must have been selected thus producing the  
 3 disconnected session receipt. This fits in with the  
 4 time of 10.36 in the email below."  
 5 Would you care to comment? Does that accord with  
 6 your understanding, or do you have a different  
 7 understanding?  
 8 A. No, that's my understanding.  
 9 Q. That's your understanding?  
 10 A. Yes.  
 11 Q. So having gone through those documents can I ask you now  
 12 to go back to your witness statement please to  
 13 paragraph 154 {E2/5/35} and this is where you say -- I'm  
 14 going to ask you what you meant by this now. You say in  
 15 paragraph 154:  
 16 "At paragraph 5.175 of his report, Mr Coyne has  
 17 referred to a report prepared by Helen Rose ... in the  
 18 context of failed reversals. The extracts taken from  
 19 the report by Helen Rose referred to by Mr Coyne are  
 20 taken out of context and mistakenly claim that the  
 21 relevant reversal was issued in error by Horizon not the  
 22 subpostmaster."  
 23 I just want to give you an opportunity -- Mr Green  
 24 was pressing you to accept that actually what you had  
 25 said in that sentence was wrong. I would like to give

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1 you an opportunity to explain to the court what you  
 2 actually meant.  
 3 A. What I meant was that the actual reversal was part of  
 4 that recovery and it had actually taken place as it  
 5 should have taken place, which is what I meant in that.  
 6 So it wasn't a failed reversal because it actually had  
 7 happened as it should have happened, but I accepted in  
 8 there that the -- it wasn't obvious to the postmaster at  
 9 the time that what had happened -- that he hadn't --  
 10 because it didn't show that he had actually -- it showed  
 11 that he had done it and he knew he hadn't done what we  
 12 referred to earlier was an explicit reversal. That's  
 13 what I meant in that.  
 14 Q. I won't take any more time up on that question.  
 15 Just two more small matters, Mrs van den Bogerd.  
 16 First of all, it was put to you by Mr Green on page 80  
 17 of yesterday's transcript {Day5/80:16} that Mrs Mather's  
 18 statement shows that Credence contains a log of every  
 19 key that's pressed --  
 20 A. Yes.  
 21 Q. -- on the counter and I would like to take you to  
 22 Mrs Mather's statement, if I may. That's E2, tab 8 and  
 23 I would like to go to page 2 of that statement please,  
 24 paragraph 9 {E2/8/2}. You will see what Mrs Mather  
 25 actually says in the first sentence.

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1 A. Yes.  
 2 Q. Now, the reason why I'm putting this to you is because  
 3 Mr Green put to you that Credence shows every single  
 4 keystroke that's pressed by the postmaster and you  
 5 accepted what he said and he put it to you on the basis  
 6 that this is what Mrs Mather said. Could I ask you this  
 7 question: is it the case that Credence gives an account  
 8 of every single key that's pressed by the postmaster in  
 9 branch?  
 10 A. That's not my understanding, not every single stroke.  
 11 Q. I'm grateful.  
 12 Then one small final question. It is based upon the  
 13 document at {F/555}. You were taken to this document by  
 14 Mr Green and it was suggested to you that Horizon Online  
 15 was about reducing operating costs. Do you remember  
 16 that?  
 17 A. Yes.  
 18 Q. I would like to explore that very briefly with you.  
 19 Could we go to page 6 of that document {F/555/6}. It is  
 20 "Purpose of the HNG programme":  
 21 "To deliver a significant reduction in the total  
 22 annual cost of ownership of Horizon, whilst ensuring the  
 23 system remains fit for purpose in the 21st Century ...  
 24 in a dynamic and changing environment."  
 25 If we go down to the second half of the page:

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1 "Recognising that HNG is not operating in a silo -  
 2 life goes on in the business - initiatives like Rural  
 3 Strategy, Network Strategy, Packet Strategy, Re-org all  
 4 have potential to bring around change ... to the  
 5 programme.

6 "HNG should also enable the business to reduce the  
 7 time to market for major developments; should be  
 8 a simpler system that is easier to change and service  
 9 manage; should be capable of supporting segments and  
 10 zones.

11 "The programme is about developing the current  
 12 Horizon system to meet business drivers, and is  
 13 a balancing act between reducing cost and building  
 14 a system fit for our needs we will cover this in  
 15 a little more detail in next few slides."

16 What I'm going to be asking you, Mrs van den Bogerd,  
 17 is whether the introduction of Horizon Online was just  
 18 about saving cost or whether it was about other things  
 19 as well, but perhaps I can ask you that question now.

20 A. Yes.

21 Q. Having read that page --

22 A. It wasn't just about saving costs. There were other  
 23 benefits for us too as an organisation.

24 Q. Could you tell the court what those other benefits or  
 25 some of those other benefits were?

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1 A. So 1, it took it to an online system, where it hadn't  
 2 previously been and it did enable us to make changes  
 3 a bit more quicker to the system itself. I think we did  
 4 look at some screen changes as well, I think. But it  
 5 was really about a better system going forward, that's  
 6 what it was about. So there were clear advantages to  
 7 being able to get changes through the system and get  
 8 products changes done more quickly.

9 Q. If we go to page 8 [F/555/8] -- well, my Lord, I see the  
 10 time. The document says what it says. I do believe  
 11 I have no further questions for this witness.

12 MR JUSTICE FRASER: All right.

13 Questions from MR JUSTICE FRASER

14 MR JUSTICE FRASER: I just have a couple of questions.

15 A couple of times this morning when you were being  
 16 asked about the detail of your witness statement and  
 17 incorrect references to various documents, et cetera,  
 18 you said you didn't have a lot of time or you didn't  
 19 have a huge -- one of your exact answers was that you  
 20 didn't have a huge amount of time to put this together.

21 A. Yes.

22 MR JUSTICE FRASER: Was there a time limit on you preparing  
 23 your witness statement?

24 A. In as much as getting the information to investigate the  
 25 issues, that was what I meant.

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1 MR JUSTICE FRASER: And what sort of time limit or pressure  
 2 was that?

3 A. To pull the information and to be able to look into the  
 4 detail of what the claimants' issues were. It was that.

5 MR JUSTICE FRASER: And is there anything else you would  
 6 like to tell me about that, about time pressure?

7 A. It's just it was -- getting the team to put together the  
 8 information. So because there were a number of issues  
 9 that needed to be investigated, which was why I needed  
 10 to use the team -- I would ordinarily have used the team  
 11 anyway to do that -- it was then me being able to get  
 12 into the detail to be able to meet the court deadline to  
 13 get the witness statement submitted.

14 MR DE GARR ROBINSON: Does your Lordship want to ask this  
 15 witness about deadlines for producing the evidence?

16 MR JUSTICE FRASER: No, not particularly. I'm going to give  
 17 you an open opportunity to ask any questions arising out  
 18 of my questions.

19 Another phrase that pops up in different documents  
 20 and you may not necessarily know what it is, but I just  
 21 thought you were the best person to ask. What's  
 22 "operational risk"? What does that mean when the  
 23 Post Office uses it in internal documents?

24 A. It means something -- operational risk would mean  
 25 perhaps losing power across the whole of the Horizon

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1 system, so if we did have a failure in terms of  
 2 connectivity, that would cause us operational risk.  
 3 It's about us being able to maintain service, so key  
 4 systems going down, for instance, would not allow us to  
 5 be able to operate: the back office systems, POLSAP or  
 6 Horizon clearly for the front offices as well.

7 MR JUSTICE FRASER: So it is a risk to the way the  
 8 Post Office business is operated --

9 A. Yes.

10 MR JUSTICE FRASER: -- is that how I should read it?

11 A. Yes.

12 MR JUSTICE FRASER: You mentioned in that first answer  
 13 losing power across the network. Losing power to an  
 14 individual branch, or an interruption of power at an  
 15 individual branch, would that be an operational risk or  
 16 not?

17 A. Yes, it would be.

18 MR JUSTICE FRASER: That would be?

19 A. Yes, we would class that as operational risk as well.

20 MR JUSTICE FRASER: Right. And then you were asked about  
 21 the list of people who had helped you with your witness  
 22 statement and you said I think there were about nine or  
 23 ten and then you gave us a list from memory. Was there  
 24 any reason that you didn't list those people in your  
 25 witness statement?

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1 A. I didn't think it was necessary.  
 2 MR JUSTICE FRASER: All right.  
 3 Then can we call up a document please, {F/1449},  
 4 which is a document we looked at yesterday. Do you  
 5 remember Mr Green asked you some questions about this  
 6 document?  
 7 A. Yes.  
 8 MR JUSTICE FRASER: And it shows two different approaches  
 9 depending on whether the amount of the miskey was  
 10 greater than £150 or not?  
 11 A. Yes.  
 12 MR JUSTICE FRASER: Now, I'm a bit confused about the  
 13 document which is just why I wanted to ask you. Let's  
 14 say the miskey is £200, am I right you would go down the  
 15 right-hand branch as we look at it and the branch would  
 16 be told that if the discrepancy, which in my example is  
 17 £200, was still apparent when they were balancing they  
 18 must make the amount good?  
 19 A. That's what it says on here.  
 20 MR JUSTICE FRASER: And I recall from the common issues  
 21 trial that means they would, for example, have to pay  
 22 the £200 in, is that right?  
 23 A. Yes.  
 24 MR JUSTICE FRASER: Right. If we look at the left branch,  
 25 which is for less than 150, so let's say that that's

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1 £50, there seems to be a little bit more to it, which  
 2 includes the possibility of a transaction correction.  
 3 A. Yes.  
 4 MR JUSTICE FRASER: Have I read that correctly?  
 5 A. Yes. This is a bit confusing on -- I haven't seen this  
 6 before. Because to me the significance of 150 is the  
 7 amount that you can settle centrally or not and  
 8 therefore in reading it that way, which is how I would  
 9 interpret that -- so if you said it was over 150, what  
 10 should be in that box is when it says "Must make good"  
 11 the option in there should be to settle centrally  
 12 because it's over the 150.  
 13 MR JUSTICE FRASER: Well, let's say we read it in that way,  
 14 so that includes settling centrally.  
 15 A. Yes.  
 16 MR JUSTICE FRASER: Go back to the left-hand box, that seems  
 17 to include within it the possibility of a transaction  
 18 correction being sent out later, because it says that in  
 19 the last four lines.  
 20 A. Yes.  
 21 MR JUSTICE FRASER: That entry is not on the right-hand  
 22 side, so am I correct in reading this chart that if it  
 23 is above 150, that option is not potentially available,  
 24 but if it's below 150, a transaction correction might be  
 25 sent out in the future?

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1 A. It might be sent out if it is over 150 as well.  
 2 MR JUSTICE FRASER: Well, that then takes me to my next  
 3 question: but it doesn't say that on the right-hand  
 4 side.  
 5 A. No.  
 6 MR JUSTICE FRASER: Can you think of any reason why that  
 7 might not be in the box on the right-hand side?  
 8 A. The only reason I can think of that is that this is an  
 9 incomplete document and, as I say, I've never -- I can't  
 10 recall ever seeing this, but that wouldn't make sense to  
 11 me reading that as currently presented.  
 12 MR JUSTICE FRASER: All right. Thank you very much. That's  
 13 very useful.  
 14 Now, any questions arising out of that?  
 15 MR DE GARR ROBINSON: Just about timing.  
 16 Further re-examination by MR DE GARR ROBINSON  
 17 MR DE GARR ROBINSON: Mrs van den Bogerd, when you made your  
 18 witness statement do you recall that it was in response  
 19 to some witness statements made by the claimants?  
 20 A. Yes.  
 21 Q. And were those witness statements expected?  
 22 A. No.  
 23 Q. Did you expect to be dealing with that kind of evidence  
 24 when it came?  
 25 A. No. No, I didn't at the time.

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1 Q. So these witness statements came in. Do you recall how  
 2 much time you had to prepare the witness statement in  
 3 response?  
 4 A. I don't remember exactly but it would have been from  
 5 memory about three weeks or so. I can't remember  
 6 exactly.  
 7 Q. And you say three weeks, but before you could properly  
 8 start work on that responsive evidence did some steps  
 9 have to be taken to --  
 10 A. Yes.  
 11 Q. -- obtain the information?  
 12 A. Yes, we needed to get the information, the transaction  
 13 data and NBSC logs, everything that we would normally  
 14 get.  
 15 Q. And do you recall how long that took?  
 16 A. Well, transaction -- if we get our files they can take  
 17 about a fortnight to come, just to get -- so it would  
 18 take --  
 19 Q. I see. Is your evidence then that after that time had  
 20 been taken up you then had about three weeks to actually  
 21 prepare a witness statement?  
 22 A. I don't even think it was that long actually, if  
 23 I remember. So ordinarily we would get the information  
 24 and then we would have time to do that properly. This  
 25 was quite pressurised because of those statements coming

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1 in unexpectedly and then having to get that, so it was  
 2 under pressure.  
 3 Q. Thank you very much.  
 4 MR JUSTICE FRASER: Thank you very much. You are now free  
 5 both to leave the witness box and obviously to discuss  
 6 the case again if you want.  
 7 A. Thank you.  
 8 MR JUSTICE FRASER: Right, Mr De Garr Robinson.  
 9 MR DE GARR ROBINSON: My Lord, I call Ms Dawn Phillips.  
 10 MS DAWN PHILLIPS (affirmed)  
 11 MR JUSTICE FRASER: Would you like to have a seat.  
 12 A. Thank you.  
 13 Examination-in-chief by MR DE GARR ROBINSON  
 14 MR DE GARR ROBINSON: Ms Phillips, there should be a bundle  
 15 of documents to hand. If I can ask you to go to tab 3  
 16 of that document {E2/3/1}, I believe the first page of  
 17 that document should describe itself as a witness  
 18 statement of Dawn Louise Phillips, do you see that?  
 19 A. Yes.  
 20 Q. Is that your name and address there at the front?  
 21 A. Yes, it is.  
 22 Q. If you go to page 3 of the statement, is that your  
 23 signature at the end?  
 24 A. It is.  
 25 Q. And is this witness statement true to the best of your

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1 knowledge, recollection and belief?  
 2 A. Yes, it is.  
 3 Q. Ms Donnelly will have some questions for you. Thank you  
 4 very much.  
 5 Cross-examination by MS DONNELLY  
 6 MS DONNELLY: Good afternoon, is it Ms or Mrs Phillips?  
 7 A. Ms.  
 8 Q. Ms Phillips, in your witness statement you say you are  
 9 team leader for agent accounting and Santander banking?  
 10 A. Yes.  
 11 Q. So I will deal with those separately if I may, taking  
 12 agent accounting first. Can I understand from your  
 13 paragraph 4 {E2/3/2}, you say:  
 14 "... I oversee the process of recovering the losses  
 15 that postmasters have declared in branches."  
 16 Are you the team leader for agent accounting?  
 17 A. Yes.  
 18 Q. And when you are referring to "recovering the losses",  
 19 are you referring there to the amount that they have  
 20 settled centrally?  
 21 A. Yes.  
 22 Q. If you look at paragraph 7 of your witness statement  
 23 which is at {E2/3/2}, do you see three lines down there  
 24 you refer to "chosen to settle shortfalls centrally"?  
 25 A. Why he.

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1 Q. You fairly recognise, don't you, at paragraph 9 that  
 2 there's no option for the postmaster to dispute the  
 3 discrepancies on Horizon, or record that they have  
 4 raised a dispute on Horizon?  
 5 A. They chose to settle centrally rather than make good is  
 6 what I meant.  
 7 Q. Yes, settle centrally rather than put the cash in  
 8 straight away?  
 9 A. Yes.  
 10 Q. And that system remains the case today -- your witness  
 11 statement is September.  
 12 A. Yes.  
 13 Q. And that remains the system.  
 14 Where you describe the agent accounting team, in the  
 15 common issues trial back in November of last year we  
 16 heard reference to the current agent debt team --  
 17 A. That's the old name.  
 18 Q. Does the substance of what you do remain the same?  
 19 A. Yes.  
 20 Q. So there's really been a semantic change from "debt" to  
 21 "accounting"?  
 22 A. (Nods).  
 23 Q. And has the same thing happened with former agent debt?  
 24 A. Yes, it's former agent accounting.  
 25 Q. But what that team is doing is debt recovery from

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1 subpostmasters who have left or been terminated?  
 2 A. Not just debt recovery, there are gains settled  
 3 centrally as well that we also deal with.  
 4 Q. The real substance of your statement is the dispute  
 5 process as it now is.  
 6 A. Yes.  
 7 Q. And looking at your paragraphs 7 and 8 {E2/3/2} we see  
 8 you refer the court to two letters, one at the end of  
 9 paragraph 7 and one at the end of paragraph 8.1. Now,  
 10 those versions that you are referring to there, do you  
 11 know when they were introduced?  
 12 A. 1 September 2014.  
 13 Q. And are they still the current versions?  
 14 A. Yes.  
 15 Q. So if we could look please at { F/1832}. Do we see  
 16 there the first of the letters that would be sent?  
 17 A. Yes.  
 18 Q. Just from looking at the first four paragraphs we see:  
 19 "Please find the attached statement that confirms  
 20 the amount you owe to Post Office Limited. The  
 21 statement provides a breakdown of how you have incurred  
 22 the total owed amount.  
 23 "There are a number of ways you can repay the money  
 24 to us; you will find all the details of the different  
 25 methods of payments on the reverse of this letter .

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1 "If you would like to repay the money by  
 2 debit/credit card ..."  
 3 Then it goes on:  
 4 "We look forward to hearing from you within the next  
 5 7 days to arrange payment."  
 6 The wording used in this letter is as if the amount  
 7 is a debt to Post Office that needs to be repaid?  
 8 A. Yes.  
 9 Q. And the last paragraph says:  
 10 "If you have any queries regarding the content of  
 11 this letter, please contact one of my team or drop us  
 12 an email at agents.accounting.team@postoffice.co.uk and  
 13 we will do our best to help you."  
 14 Now, what's missing from that letter is any mention  
 15 of a dispute process there?  
 16 A. Yes.  
 17 Q. If you look at the first paragraph again, "Please find  
 18 the attached statement", that's not included with the  
 19 letter that you have exhibited which is this version,  
 20 but it says it provides a breakdown, so what information  
 21 would be shown on that statement?  
 22 A. It would be each individual amount settled centrally in  
 23 the previous trading period, so it could be one branch  
 24 discrepancy settled at the end of the month, several  
 25 transaction corrections and/or an invoice.

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1 Q. So if we go to {F/1257.2}, we see here an example  
 2 I think of the same letter that we were just looking at  
 3 which was sent to Mr Tank. If we go to page 3  
 4 {F/1257.2/3}, is that the statement, the form of the  
 5 statement that would be attached?  
 6 A. Yes.  
 7 Q. So here there has been one amount settled centrally and  
 8 it appears like this, "branch discrepancy" and then the  
 9 date and the amount.  
 10 A. Yes.  
 11 Q. Again, this statement doesn't have any indication that  
 12 it is possible to dispute this amount, does it?  
 13 A. No.  
 14 Q. Going back to your witness statement at {E2/3/2}, you  
 15 say at paragraph 8.1:  
 16 "If we do not receive a response within 7 days we  
 17 send a second letter."  
 18 A. Yes.  
 19 Q. And as I understand from your witness statement there  
 20 aren't any phone -- later on you refer to some phone  
 21 calls might be made, but there aren't any phone calls  
 22 in-between this stage, are there?  
 23 A. No.  
 24 Q. And when you say "if we do not receive a response", is  
 25 that your team?

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1 A. Yes.  
 2 Q. If we go then to {F/1833}, this is the second letter  
 3 that you have exhibited.  
 4 A. Yes.  
 5 Q. "We wrote to you previously requesting payment of the  
 6 amount you owe to Post Office Limited.  
 7 "We are concerned that you have not contacted us to  
 8 arrange payment.  
 9 "Payment is now overview due and needs to be made  
 10 within 7 days of this letter.  
 11 "As previously mentioned, there are a number of ways  
 12 you can repay the money to us. These are listed on the  
 13 reverse of this letter."  
 14 So we have all the same language again, haven't we,  
 15 that this is a debt?  
 16 A. Mm-hm.  
 17 Q. Then the next paragraph:  
 18 "We have to advise you that if we do not receive  
 19 payment or your instructions within this timescale, this  
 20 may be escalated to your contracts advisor for further  
 21 action."  
 22 So what's that supposed to mean?  
 23 A. If they don't make a payment or raise a dispute with us  
 24 then we could send it to the contracts advisor for  
 25 further action.

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1 Q. And in your answer you have referred to "raise  
 2 a dispute", but again there's no mention of dispute, is  
 3 there, in this letter?  
 4 A. Well, in both letters it mentions that if they have any  
 5 enquiries they can contact us.  
 6 Q. It's a bit different, isn't it, to say "If you have any  
 7 queries regarding the content of this letter" -- it's  
 8 a bit different writing that to "If you want to raise  
 9 a dispute about this amount then please find enclosed  
 10 the dispute process"?  
 11 A. Yes.  
 12 Q. Are these two letters usually successful in getting  
 13 money in?  
 14 A. Sometimes it is resolved even before the second letter  
 15 goes out. It varies.  
 16 Q. But by the time this second letter is sent, normally the  
 17 subpostmaster has paid?  
 18 A. Yes.  
 19 Q. If we look at your witness statement again, so {E2/3/2},  
 20 paragraph 9, in the second sentence there you say that  
 21 postmasters are able to call the NBSC helpline or your  
 22 team and raise a dispute.  
 23 A. Yes.  
 24 Q. The letters we just looked at don't refer to calling the  
 25 helpline, do they?

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1 A. No.  
 2 Q. But it is possible, isn't it, that a subpostmaster might  
 3 have raised a dispute on the helpline before you send  
 4 your first letter?  
 5 A. If they have raised a dispute on the helpline before we  
 6 have sent our letter then it is before they have  
 7 actually settled it centrally.  
 8 Q. Well, you don't send the letter the second they settle  
 9 centrally, do you?  
 10 A. We send it on the Monday after, so unless they actually  
 11 made the error on the last day of their trading period  
 12 then it's likely that they made the error in the  
 13 previous few weeks.  
 14 Q. So they could have identified that they've got an  
 15 unexplained discrepancy say two weeks before the end of  
 16 their trading period.  
 17 A. Yes.  
 18 Q. And they call the helpline at that point and say "I want  
 19 to dispute this, this is going to affect my accounts,  
 20 I'm not responsible for this, it is a system error" and  
 21 two weeks later, nothing has been resolved, they have to  
 22 settle centrally, you then send them the letter on the  
 23 Monday?  
 24 A. Yes.  
 25 Q. So what you don't do is go and check the helpline logs

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1 to see if they have actually already raised a dispute?  
 2 A. We do actually, every Friday we run a report to see who  
 3 has settled something centrally and although we can't  
 4 check every amount we do try and check the majority of  
 5 the larger ones.  
 6 Q. Sorry, I think you answered by reference to whether you  
 7 check who has settled centrally --  
 8 A. Yes.  
 9 Q. -- and I was asking whether you routinely check the  
 10 helpline logs?  
 11 A. Yes, I do. Yes we do, as a team.  
 12 Q. For the larger ones you check the helpline logs?  
 13 A. Yes. Unfortunately there are too many to check every  
 14 single one, but we do check the larger amounts.  
 15 Q. So your team has access to the helpline logs?  
 16 A. Yes.  
 17 Q. As I understand it, it depends on somebody in your team  
 18 going to check the helpline logs rather than there being  
 19 an automatic process from the helpline to notify your  
 20 team?  
 21 A. If the branch have already settled centrally and tell  
 22 NBSC that they want to dispute that, then they would let  
 23 us know.  
 24 Q. But I was speaking about if a subpostmaster was raising  
 25 a dispute in advance of settling centrally?

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1 A. Then no, until he has actually settled it centrally then  
 2 I wouldn't know about it.  
 3 Q. So subpostmaster could call up the helpline and say "I'm  
 4 going to have a problem, I know this is going to affect  
 5 my accounts, I'm not responsible for this amount, I want  
 6 to dispute it" and then you still end up sending your  
 7 letter out on the Monday following the settled  
 8 centrally?  
 9 A. I can't speak for any calls that have happened like  
 10 that. I've never seen one.  
 11 Q. Well, you also don't look, do you?  
 12 A. Well, we do regularly check. We check every week.  
 13 Q. But aren't you looking for when they have settled  
 14 centrally calls?  
 15 A. Yes.  
 16 Q. You're not looking back and saying "Has there been any  
 17 calls before that"?  
 18 A. They don't make -- we look for any call in the previous  
 19 month that could relate to the loss that they have  
 20 settled. We don't specifically search for settled  
 21 centrally calls.  
 22 Q. And so this is an ad hoc process, is it?  
 23 A. No, it's a weekly standard process.  
 24 Q. But which ones you decide to look at, or is there  
 25 a specific amount?

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1 A. We try and do everything above 5,000.  
 2 Q. Above 5,000?  
 3 A. Mm-hm.  
 4 Q. Right. So you wouldn't bother checking the helpline log  
 5 for £2,000?  
 6 A. It's not a case of not bothering, it's a case of how  
 7 many have settled centrally and how many are large.  
 8 MR JUSTICE FRASER: I wonder if you could start again with  
 9 the sequence, because I'm slightly puzzled.  
 10 MS DONNELLY: My Lord, I do apologise: the sequence from if  
 11 a subpostmaster has raised a dispute prior to settling  
 12 centrally?  
 13 MR JUSTICE FRASER: And what's checked and when.  
 14 MS DONNELLY: So if mid-way through trading period  
 15 a subpostmaster contacts the helpline and says "I have  
 16 a £2,000 discrepancy in my accounts that I know if it is  
 17 not resolved is going to have to be settled centrally  
 18 and I want to dispute that now", as I understand your  
 19 evidence, after they in fact settle centrally, on the  
 20 Monday morning your team will send them letter 1 because  
 21 you wouldn't check the helpline logs for an amount less  
 22 than £5,000?  
 23 A. I'm not saying it's always £5,000.  
 24 Q. But that's generally what would happen?  
 25 A. Yes.

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1 MR JUSTICE FRASER: So if it is not always £5,000 what other  
 2 figure limit would it be?  
 3 A. It depends. We can sometimes check them all. It  
 4 depends how many fresh items have been settled centrally  
 5 in that week.  
 6 MR JUSTICE FRASER: And do you get a list of these?  
 7 A. I can pull them from our finance system.  
 8 MR JUSTICE FRASER: Filtered by an amount that you decide  
 9 that day?  
 10 A. No, we pull everything that's been settled that month.  
 11 MS DONNELLY: Do you get any transcripts of those helpline  
 12 calls?  
 13 A. No, we have to search for them.  
 14 Q. There will be a call log, but those helpline calls are  
 15 also recorded, aren't they?  
 16 A. Yes.  
 17 Q. Do you listen to the recording, or do you just look at  
 18 how it's --  
 19 A. We just look at the log on the screen, not a recording.  
 20 Q. So the completeness and accuracy of what appears on the  
 21 helpline log would be very important to your team?  
 22 A. Yes. But if we were unsure we would pick up the phone  
 23 and speak to the branch.  
 24 Q. Do you send to the subpostmaster the copy of the  
 25 helpline log that you are looking at so they know what

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1 you've got?  
 2 A. No. They made the call, we would assume they would know  
 3 what it was.  
 4 Q. Well, what the subpostmaster doesn't know is how it has  
 5 been recorded by the helpline?  
 6 A. Well, we'd discuss that -- if there was an issue and we  
 7 had to call them we would discuss that with them.  
 8 Q. Is there any auditing of the process that you have just  
 9 described being carried out by your team?  
 10 A. Yes, we have controls in place that we have to report  
 11 and measure every month.  
 12 Q. So what are they?  
 13 A. So we've got an external firm called Traction that we  
 14 have to report to and attach evidence that we have  
 15 followed that process every week or month, whatever the  
 16 actual process is supposed to be done to.  
 17 Q. So do you report -- sorry, did you say it is an external  
 18 company?  
 19 A. PwC I do -- I can't remember the name of it but we have  
 20 an external company that we have to load all our  
 21 evidence onto.  
 22 Q. Do you report to them which value you have decided to  
 23 look at the helpline logs for --  
 24 A. No.  
 25 Q. -- that week?

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1 A. No.  
 2 Q. So that detail isn't recorded?  
 3 A. No.  
 4 Q. If we just look at paragraph 10 of your witness  
 5 statement which is {E2/3/2}, you say there that:  
 6 "If a postmaster calls my team after receiving our  
 7 request for payment and explains they are raising  
 8 a dispute, we will place a block on their account on the  
 9 system until the dispute is resolved. If they do this  
 10 within 7 days we will not send the second letter  
 11 referred to in 8.1 above, but a postmaster can dispute  
 12 a shortfall at any stage in the process (not just after  
 13 the first letter )."  
 14 And then you go on at paragraph 11:  
 15 "When a postmaster disputes a shortfall with my team  
 16 we gather as much information as possible from the  
 17 branch about why they are disputing it. We also send  
 18 them a branch dispute form to complete ..."  
 19 Just pausing there, is that right, that you gather  
 20 as much information as possible and also send them  
 21 a branch dispute form?  
 22 A. Not necessarily. If it is something like a miskey which  
 23 is just a simple case of the branch recording it with  
 24 helpline, we check with helpline that it has been  
 25 received and gone to the appropriate team, no need for

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1 a dispute form, that's a simple one. We only send the  
 2 dispute forms when it is more in-depth and we have to  
 3 pass the information on for someone else to investigate,  
 4 so it is better coming from the postmaster in their own  
 5 words, so that's when the form is sent.  
 6 Q. So say it is a more complicated one when you are going  
 7 to require a branch dispute form.  
 8 A. Yes.  
 9 Q. Do you first get all the information from them and then  
 10 send a branch dispute form for them to provide it all  
 11 again?  
 12 A. No. It would probably start it with a discussion on the  
 13 phone. If it looked like it was going to be  
 14 a complicated one we would stop it there and say "We're  
 15 going to send you a form out", we put a block on the  
 16 debt immediately so all the process was halted and then  
 17 send them a form and let them fill it in and send it  
 18 back.  
 19 Q. So your paragraph 11 isn't quite right, if it's the  
 20 branch dispute form --  
 21 A. No, we don't do both. It's not required for all of  
 22 them.  
 23 Q. You don't necessarily do both and you don't always send  
 24 a branch dispute form?  
 25 A. Only if it is difficult .

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1 Q. Since it was introduced -- I think you later tell us it  
 2 was introduced at the beginning of 2018?  
 3 A. Yes.  
 4 Q. How many have you sent?  
 5 A. Sorry, I don't have that number with me.  
 6 Q. Broadly?  
 7 A. I wouldn't like to guess.  
 8 MR JUSTICE FRASER: Well, thousands, two?  
 9 A. No, probably at least five a month.  
 10 MR JUSTICE FRASER: Five a month?  
 11 A. Yes. But bear in mind they are not just the dispute --  
 12 they can just send us an email, it doesn't have to be  
 13 the dispute form -- or a letter .  
 14 MS DONNELLY: Because your witness statement reads as if  
 15 this is some sea change in approach. If you look, for  
 16 example, at paragraph 12 {E2/3/3}:  
 17 "The branch dispute form was introduced to capture  
 18 the key areas of information we would collect from  
 19 a branch about a dispute. Whilst the branch dispute  
 20 form was only recently introduced at the beginning of  
 21 2018, the process of collecting this key information  
 22 from the branch has been in place  
 23 since November 2016 ..."  
 24 And it goes on. It reads as if this was something  
 25 new and improved and was happening all the time but --

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1 A. It is improved.  
 2 Q. -- it's actually quite rare that you send it?  
 3 A. No, it is improved.  
 4 MR JUSTICE FRASER: Can you not overspeak each other. It is  
 5 both of you I think. You put your question and then you  
 6 give your answer.  
 7 MS DONNELLY: I do apologise, my Lord and Ms Phillips .  
 8 It is actually quite rare, five a month or so, that  
 9 you actually send out the branch dispute form, it's not  
 10 quite the impression that you're giving in your witness  
 11 statement, is it?  
 12 A. No, maybe not, but it still helps both us and the  
 13 branch. It has got simple things on there like who are  
 14 we speaking to at the branch, because we have absentee  
 15 postmasters but their name is on the account. If it is  
 16 somebody else running the branch we need to know who it  
 17 is and their name and who to speak to.  
 18 Q. And without the branch dispute form you might not get  
 19 that right?  
 20 A. Well, we send letters to the branch to the postmaster.  
 21 Q. Is there a financial limit that applies to your process  
 22 of sending out the branch dispute form?  
 23 A. No.  
 24 Q. You are describing it as essentially something positive  
 25 for subpostmasters, but if you look at paragraph 11 at

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1 the top of {E2/3/3}:  
 2 "Branches are given seven days to return the  
 3 completed form, otherwise we unblock the shortfall and  
 4 send them another letter requesting payment."  
 5 I mean in some ways a subpostmaster who receives  
 6 a branch dispute form is in a worse place than if they  
 7 didn't because now they're up against the clock to  
 8 complete it in seven days or you unblock, is that right?  
 9 A. If they didn't send a dispute at all it would never be  
 10 blocked and they would be up against the clock anyway as  
 11 you put it .  
 12 Q. No, but in order for them to be sent a branch dispute  
 13 form they have to dispute with your team in the first  
 14 place?  
 15 A. Yes.  
 16 Q. So that's happened. Then some, about five a month, get  
 17 a branch dispute form sent to them and those ones now  
 18 have to return it within seven days otherwise the amount  
 19 is unblocked, even though they have already told you  
 20 there's a dispute.  
 21 A. Again, it's seven extra days. If they rang up and  
 22 described the dispute to us there and then it would be  
 23 blocked immediately and dispute -- and the dispute would  
 24 take place, but if they can't explain it to us then they  
 25 need to send the form in.

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1 Q. Could we have a look at the form. It is at {F/1831}.  
 2 So who decided to introduce the form?  
 3 A. It was a joint between my team, my senior manager and  
 4 the contracts advisor team.  
 5 Q. Who is your senior ...?  
 6 A. Alison Bolsover.  
 7 Q. Do you know was any part of this branch support  
 8 programme related at all to what had gone before?  
 9 A. It came in a discussion between myself, Alison and the  
 10 contracts advisors that we should all be working from  
 11 the same book basically, so they use the form as well.  
 12 Q. If we have a look under "Dispute details ", it says:  
 13 "Please provide details of your challenge, evidence  
 14 to support this should be included (do not send original  
 15 paperwork). All information requested below must be  
 16 provided to enable an investigation ."  
 17 And then we've got the reference to debt recovery  
 18 being on hold for seven days.  
 19 If we look at what's required below: date of  
 20 discrepancy, product, NBSC ref number, et cetera. It is  
 21 quite possible, isn't it, that somebody when they have  
 22 come to settle centrally doesn't exactly know the date  
 23 of the discrepancy or the product?  
 24 A. So if they don't know -- if they have settled an unknown  
 25 branch discrepancy, we would immediately redirect them

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1 to NBSC. We wouldn't -- we cannot pass the dispute on  
 2 to a team to investigate if we don't have a team to pass  
 3 it on to.  
 4 Q. So if somebody writes here "£2,000 short, must have  
 5 happened over these three days, don't know exactly why",  
 6 you can't deal with that?  
 7 A. No.  
 8 Q. And so is the debt unblocked?  
 9 A. We would call the branch back, or reply via email and  
 10 tell them to ring NBSC for guidance on how -- to see if  
 11 they can find the loss.  
 12 Q. But is the debt unblocked? Is debt recovery --  
 13 A. It depends. We're waiting for them to call NBSC and get  
 14 a reference number, we then check the reference number  
 15 at a later date and see what NBSC have advised.  
 16 Q. And if ultimately the person is not able to provide  
 17 a specific date and product, will the debt be unblocked?  
 18 A. Yes, I'm afraid so.  
 19 Q. And why is an NBSC reference number required on the  
 20 branch dispute form?  
 21 A. If they have one, we need it.  
 22 Q. It doesn't quite say that though, does it? It suggests  
 23 that it is a requirement that you have an NBSC reference  
 24 number?  
 25 A. Well, if they've got an issue and they've got a loss,

1 I would have expected them to ring NBSC prior.  
 2 Q. Even if they have settled it on the Friday, you sent  
 3 your letter on the Monday ...?  
 4 A. Like I say, they still need to -- if they don't know  
 5 what it's for they still need to ring NBSC.  
 6 Q. And what does your team do now you've got this  
 7 collection of branch dispute forms? You have told us it  
 8 is about five a month. Is there any analysis, or do you  
 9 group them together, look for themes?  
 10 A. We don't deal with the actual dispute. We pass them on  
 11 to the relevant team. That's why we need a product or  
 12 something to pass on so we know which team to pass it on  
 13 to deal with. We're not experts on the transactions,  
 14 but we will pass it on and get a response.  
 15 Q. And do you then track how they are resolved?  
 16 A. Yes.  
 17 Q. So do you know of the branch dispute forms that came in  
 18 last year how many ultimately ended up in the  
 19 subpostmaster repaying?  
 20 A. Not off the top of my --  
 21 Q. You don't track that?  
 22 A. No.  
 23 Q. Sorry, I spoke too quickly.  
 24 A. No, we don't track it. Once the debt is cleared it is  
 25 off the system and it's not part of the measures any

1 more.  
 2 Q. But you appreciate it might ultimately never have been  
 3 a debt?  
 4 A. Yes, and if something arises -- if they have paid and  
 5 a transaction correction comes through after, they are  
 6 welcome to keep the transaction correction that relates  
 7 to the debt that they have already paid.  
 8 Q. So if there's a need to obtain transaction data or make  
 9 an ALQ request, anything like that, that's not dealt  
 10 with by your team?  
 11 A. No.  
 12 Q. Could we look please at {H/173/5}. This is part of  
 13 a letter sent by the claimants' solicitor to  
 14 Post Office's solicitors on 22 January of this year. Do  
 15 you see at point 9 at the top it says the claimants'  
 16 solicitors identified 11 to 12 in your witness statement  
 17 and said:  
 18 "Please disclose documents relating to Post Office's  
 19 procedures in its use of the branch dispute form,  
 20 including recording internal actions taken on receipt."  
 21 Were you told about that request?  
 22 A. I think I was asked if there was any formal dispute --  
 23 any process relating specifically to the dispute form,  
 24 but it falls in with the rest of the dispute, it's just  
 25 a process that we follow. There's no formal policy or

1 process in place.  
 2 Q. No formal policy or process in place ...?  
 3 A. Specifically to the branch dispute form. It's generic  
 4 to any dispute.  
 5 Q. So if we go just quickly to {H/227/3}, this is the  
 6 response we see from 27 February 2019. Do you see at  
 7 point 9 again:  
 8 "Post Office has confirmed that there is not  
 9 a specific document which relates ..."  
 10 Do you see that?  
 11 A. Yes.  
 12 Q. That's effectively what you have just described now?  
 13 A. Yes.  
 14 Q. And then it says:  
 15 "A flowchart of the dispute process is at ..."  
 16 And there is a specific number given. Do you know  
 17 what that flowchart is?  
 18 A. Not without looking at it, no.  
 19 Q. Can we go to {F/1276}. Do you recognise that flowchart?  
 20 A. Not the title.  
 21 Q. There are two pages to this document, if you want to  
 22 just glance quickly at page 2?  
 23 A. Not just yet, thank you.  
 24 Q. No.  
 25 (Pause).

1 A. Okay, page 2 please {F/1276/2}.  
 2 Q. Just so you can see page 2.  
 3 A. That is a very old one.  
 4 MR JUSTICE FRASER: Very old did you say?  
 5 A. Yes. It refers to a relationship manager which we do no  
 6 longer ...  
 7 MR JUSTICE FRASER: Do you recall when you stopped having  
 8 that?  
 9 A. 2015 I think. I can't be sure -- I'm not entirely sure  
 10 when they left .  
 11 Q. Go back to page 1 please {F/1276/1}. Do you see in the  
 12 bottom half of the page there is a rectangle, "Issue  
 13 passed to branch support team". Does that still exist?  
 14 A. We've got a support services team.  
 15 Q. Not a branch support team?  
 16 A. That's not a name I would recognise them by: support  
 17 services resolution team.  
 18 Q. So this is obviously not the current process, is it?  
 19 A. No, I just said it's not.  
 20 Q. If you go back over to page 2 please {F/1276/2}, who was  
 21 the relationship manager?  
 22 A. Andy Winn.  
 23 Q. How long did he hold that position?  
 24 A. I don't know.  
 25 Q. And previously the process would be that it was

1 Andy Winn who was essentially dealing with the  
 2 resolution of disputes?  
 3 A. I can't answer to what the process was. I know he dealt  
 4 with disputes but I don't know at what point they went  
 5 to him.  
 6 Q. Just on the face of this document it appears that he is  
 7 the start of the dispute resolution process. If you go  
 8 back to page 1 --  
 9 MR JUSTICE FRASER: Ms Donnelly, I'm not sure that is really  
 10 a question for the witness. She said it is an old  
 11 document, she said who the person was and she doesn't  
 12 know. Beyond that it is probably submission, isn't it ,  
 13 for me?  
 14 MS DONNELLY: Yes, thank you, my Lord.  
 15 MR JUSTICE FRASER: So back to you.  
 16 MS DONNELLY: Is there currently an appeal process?  
 17 A. In what respect?  
 18 Q. So you receive a branch dispute form. You say it is  
 19 sent off to the relevant team to look at and you say you  
 20 track that.  
 21 A. Yes.  
 22 Q. If a subpostmaster is not satisfied with how that team  
 23 resolved their dispute, is there an appeal?  
 24 A. They can come back to us and request and we will go to  
 25 support services for assistance .

1 Q. That doesn't sound like an appeal process. There's not  
 2 another level?  
 3 A. For us, no, it's not. Support services provide extra  
 4 assistance for us.  
 5 Q. You are also the team leader for Santander banking.  
 6 Just a few questions if I may in relation to some  
 7 figures which appear in Mr Smith's witness statement.  
 8 If we could go please to {E2/9/4}. We see here this  
 9 is part of the witness statement from Mr Smith that was  
 10 made on 16 November of last year and do you see just at  
 11 the top of the page it is actually the second part of  
 12 paragraph 16 which starts on the previous page. He  
 13 says:  
 14 "However, I have spoken to various team leaders  
 15 within the business in order to gain a sense of  
 16 proportion of TCs that have been challenged in their  
 17 departments historically and what proportion of those  
 18 challenges were successful (ie leading to a change in  
 19 the TC before eventually being accepted or  
 20 a compensating TC being issued). The following sections  
 21 of this witness statement are based on information  
 22 provided to me by the team leaders identified in  
 23 the headings ..."  
 24 Then if we go to page 5 of the document {E2/9/5} you  
 25 see at the bottom of the page "Agent accounting team",

1 Dawn Phillips, that's you?  
 2 A. Yes.  
 3 Q. "Santander manual deposits" and we see he says:  
 4 "In relation to Santander manual deposits  
 5 Post Office received the following number of disputes in  
 6 the 2016/17 financial year."  
 7 And we can see the figures that appear there: errors  
 8 received from Santander, 19,000-odd; disputes received  
 9 from branch, et cetera and then it goes on.  
 10 A. Can I just say not all those disputes were from branch.  
 11 They were not issued as transaction corrections .  
 12 A dispute could have been sent on the basis of evidence  
 13 received from the branch relating to a letter .  
 14 Q. If we just take it one step at a time for now. Is it  
 15 right that you provided those figures to Mr Smith?  
 16 A. Yes.  
 17 Q. And did you know the reason he wanted them?  
 18 A. Yes.  
 19 Q. So you knew that he wanted to give a sense of proportion  
 20 of TCs that had been challenged?  
 21 A. Yes.  
 22 Q. And where did you get this information from?  
 23 A. From spreadsheets that we maintained on the team.  
 24 Q. So you had an existing spreadsheet with this information  
 25 in?

1 A. Yes.  
2 Q. Because how this document was read and understood by  
3 both experts acting in this case is that the first  
4 column was TCs issued by Post Office to branch?  
5 A. No.  
6 Q. And the second column is TCs disputed by branch to  
7 Post Office?  
8 A. No.  
9 Q. That's completely wrong?  
10 A. Yes -- well, no, your perception is wrong I'm afraid.  
11 It does say errors received from Santander, it does not  
12 say TCs issued to branch.  
13 Q. But you might not know that both experts read it in that  
14 way given the purpose that Mr Smith had set out earlier :  
15 that's what he said he was going to provide and this is  
16 what then appeared?  
17 A. That is errors received from Santander, that is not  
18 transaction corrections issued to branch.  
19 Q. And we see if we go to {E2/15} that Mr Smith provided  
20 a further witness statement. We received this on the  
21 claimants' side at 17.48 on Friday 8 March and he says  
22 there that he has rereviewed his witness statement, do  
23 you see that within paragraph 3?  
24 A. Yes.  
25 Q. So he spoke to you again, did he?

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1 A. Yes.  
2 Q. When did you first find out that there was an issue with  
3 the figures you had provided that were in Mr Smith's  
4 witness statement?  
5 A. It's not an issue with the figures, the figures remained  
6 the same, I think it is an explanation of what  
7 the headers actually mean.  
8 Q. When did you first become aware that some further  
9 explanation might be required?  
10 A. Because someone assumed that they were transaction  
11 corrections issued to branch and it was queried.  
12 Q. Sorry, when did you become aware that this --  
13 A. Not long ago.  
14 Q. Because if you had provided this evidence rather than  
15 Mr Smith you might have been able to explain it a little  
16 bit more clearly, do you think?  
17 A. Yes.  
18 Q. And if we could go over the page please {E2/15/2}, at  
19 paragraph 5 he says:  
20 "The figures in my first statement of 2,890  
21 'disputes received from branch' represents the number of  
22 disputes between Post Office and Santander ..."  
23 A. Yes.  
24 Q. And then paragraph 6:  
25 "I understand from my colleague Dawn Phillips that

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1 the Santander manual deposits team issued 3,968  
2 transaction corrections during the financial year  
3 2016-2017."  
4 So if someone had misread Mr Smith's first witness  
5 statement, we've got about a fivefold difference from  
6 about 19,500, it's actually only around 4,000?  
7 A. That were issued.  
8 Q. Now, what he hasn't told us, or isn't clear from his  
9 witness statement, perhaps you can just clarify, is how  
10 many of the 3,968 transaction corrections that were  
11 issued were disputed?  
12 A. I can't answer that. I have already been asked that  
13 question and it's not something we recorded as to  
14 whether Post Office disputed it with Santander on the  
15 postmaster's behalf with evidence from the branch, or it  
16 was an actual transaction correction dispute.  
17 Q. Had Mr Smith specifically asked you that?  
18 A. Yes.  
19 Q. And you told him it's not something that --  
20 A. It's not something we recorded.  
21 Q. Could we just go back please to {E2/9/5}. Could you  
22 just help us understand if about 19,500 errors are  
23 received by Post Office from Santander and Post Office  
24 actually issue only around 4,000, what has happened to  
25 the rest?

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1 A. So Santander do a manual match of figures to Horizon to  
2 the actual paperwork that they receive. If it doesn't  
3 match, they sent us an error notice. They were all in  
4 different categories, so several of the categories we  
5 know it was a timing issue and if we just waited a week  
6 they would send us another compensating error to clear  
7 it. A lot, I would say 50% of what they sent us could  
8 be cleared with a letter to branch requesting copies of  
9 their paperwork which we could then send back to  
10 Santander.  
11 Q. So it's quite a lot more complicated than the way it is  
12 presented perhaps in Mr Smith's first or second  
13 statement?  
14 A. Well, maybe. We issued a lot less than Santander gave  
15 us.  
16 Q. So you are doing some sort of internal --  
17 A. Yes.  
18 Q. -- reconciliation yourself?  
19 A. Prior to --  
20 Q. That's a manual process, is it?  
21 A. Yes.  
22 MS DONNELLY: I don't have any further questions, my Lord.  
23 MR JUSTICE FRASER: Thank you very much.  
24 Mr De Garr Robinson, any re-examination?  
25 Re-examination by MR DE GARR ROBINSON

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1 MR DE GARR ROBINSON: I have only one question, Ms Phillips.  
 2 You were asked about the dispute process and you were  
 3 asked what happened if the subpostmaster was not  
 4 satisfied with a decision that was made at the end of  
 5 that process, was there an appeal, and you indicated  
 6 that you would then call in support services for  
 7 assistance. Could you explain what support services  
 8 would do?  
 9 A. They are capable of doing a more in-depth investigation  
 10 than perhaps we could in FSC, so they would be able to  
 11 provide more information and a breakdown of what  
 12 happened in branch.  
 13 Q. And how detailed would their investigation be?  
 14 A. Extremely detailed.  
 15 Q. Thank you, Ms Phillips.  
 16 My Lord, I have no further questions.  
 17 Questions from MR JUSTICE FRASER  
 18 MR JUSTICE FRASER: Just a couple of questions on the  
 19 table -- could we go back to it please {E2/9/5}. We've  
 20 got E2/9/5 on the screen which you have been asked some  
 21 questions about. The first column I think you say the  
 22 number is correct but the description is wrong; is that  
 23 fair?  
 24 A. No, the errors are received from Santander, but they are  
 25 not transaction corrections issued to branch.

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1 MR JUSTICE FRASER: Should I reading the heading to column 2  
 2 differently?  
 3 A. Yes, as in Paul's second statement --  
 4 MR JUSTICE FRASER: Well, I'm rather asking you because you  
 5 provided the figures.  
 6 A. So they are just disputes sent to Santander from Paul.  
 7 They can be disputes where we have sent a letter to  
 8 branch requesting evidence and not issued a transaction  
 9 correction, we have just asked for the evidence and it  
 10 has been provided, or they can be transaction correction  
 11 disputes.  
 12 MR JUSTICE FRASER: And as far as you know are the headings  
 13 to the other three headings correct?  
 14 A. Yes.  
 15 MR JUSTICE FRASER: They are.  
 16 One question Ms Donnelly asked you in respect of  
 17 this and the total which I think is from Mr Smith's  
 18 second statement is 3,968 in terms of transaction  
 19 corrections. She asked how many of those 3,968  
 20 transaction corrections that were issued were disputed  
 21 and you said you can't answer that, you have already  
 22 been asked that question and it's not something you  
 23 record.  
 24 A. No.  
 25 MR JUSTICE FRASER: When were you asked that question?

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1 A. In recent weeks.  
 2 MR JUSTICE FRASER: In recent weeks leading up to this  
 3 trial?  
 4 A. Yes.  
 5 MR JUSTICE FRASER: You weren't asked it at the time in  
 6 respect of these figures?  
 7 A. Not the first statement. That's how the second  
 8 statement came around because we were asked to -- we  
 9 were asked that question: how many of those TCs were  
 10 actually disputed by branch, and I can't answer it.  
 11 MR JUSTICE FRASER: Understood.  
 12 I assume nothing arising out of that?  
 13 Thank you very much for coming. You have a much  
 14 shorter stint in the witness box than  
 15 Mrs van den Bogerd.  
 16 MR DE GARR ROBINSON: My Lord, I wonder whether this would  
 17 be a convenient moment for a break.  
 18 MR JUSTICE FRASER: I think it would. Who is your next  
 19 witness?  
 20 MR DE GARR ROBINSON: It is Mrs Mather. I hope I'm  
 21 pronouncing her name correctly. It is one of the things  
 22 I want to check.  
 23 MR JUSTICE FRASER: Let's ask her right at the beginning.  
 24 And is there a fighting chance, Mr Green, of finishing  
 25 her evidence today or is she going to go into tomorrow?

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1 MR GREEN: My Lord, we're hoping to finish her and Mr Smith  
 2 if we can.  
 3 MR JUSTICE FRASER: Excellent.  
 4 MR GREEN: Definitely her.  
 5 MR JUSTICE FRASER: None of this is binding it is just to  
 6 give me a general outline.  
 7 MR GREEN: Of course.  
 8 MR JUSTICE FRASER: Okay, we will come back in at 20 past.  
 9 (3.10 pm)  
 10 (Short Break)  
 11 (3.20 pm)  
 12 MR DE GARR ROBINSON: My Lord, I call Tracy Mather -- that's  
 13 how one actually pronounces her name.  
 14 MRS TRACY MATHER (sworn)  
 15 MR JUSTICE FRASER: Thank you, Mrs Mather. Do have a seat.  
 16 Examination-in-chief by MR DE GARR ROBINSON  
 17 MR DE GARR ROBINSON: Now, Mrs Mather, in front of you there  
 18 should be a file of documents. I would like you to go  
 19 to tab 8 of the file please {E2/8}. Do you see --  
 20 I think there's a sheet of corrections, but after that  
 21 sheet of corrections do you see a witness statement of  
 22 "Tracy Jane Wendy Mather"?  
 23 A. Yes.  
 24 Q. Is that your name and address on the first page?  
 25 A. It is.

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1 Q. If you go to the back of the document, is that your  
 2 signature?  
 3 A. It is.  
 4 Q. And do you also see a document with three corrections to  
 5 your witness statement at the front of that file?  
 6 A. I do.  
 7 Q. And now, Mrs Mather, I have to ask a question which is  
 8 born out of sheepishness on my part. Everyone else in  
 9 court will understand why, but you won't. I would like  
 10 to ask you about paragraph 12 of your statement please  
 11 {E2/8/3}. Here you are describing Credence and you say:  
 12 "Credence is used as an information tool. It is  
 13 designed to work alongside other applications. It is  
 14 used to help understand what has happened in a branch as  
 15 it records all keystroke activity performed in that  
 16 branch by the user ID, date and time."  
 17 Could I ask you to explain what you mean by the  
 18 phrase "It records all keystroke activity"?  
 19 A. What I actually meant was the transactional data as in  
 20 sales and non-sales.  
 21 Q. I see, thank you.  
 22 Subject to the three corrections you have identified  
 23 and your clarification of paragraph 12, do you confirm  
 24 that this witness statement is true to the best of your  
 25 knowledge, recollection and belief?

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1 A. It is.  
 2 Q. Thank you, if you could wait there please.  
 3 Cross-examination by MR GREEN  
 4 MR GREEN: Now, Mrs Mather, at paragraph 1 of your witness  
 5 statement, if we look please {E2/8/1}, you say you are  
 6 the FSC team leader, so are you the team leader for FSC?  
 7 A. No, sorry, for my team. It's just a generic team leader  
 8 role in FSC.  
 9 Q. You are a team leader within FSC?  
 10 A. Yes.  
 11 Q. And which is your team? Have you got a special team  
 12 name?  
 13 A. For the last year and a half I have had MoneyGram and  
 14 cheques I have had for two years, just over two years.  
 15 Before that I was on payout, postal orders.  
 16 Q. Different things?  
 17 A. Yes.  
 18 Q. And how many people work in FSC overall?  
 19 A. I would be guessing.  
 20 Q. Roughly?  
 21 A. 60?  
 22 Q. And do you have any special training when you move to  
 23 a new product you are dealing with?  
 24 A. Not training of such. You tend to -- because the team  
 25 leaders might move on to another team, so you would

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1 spend time with that team leader and then when they move  
 2 into a new area you can always go back if there was  
 3 something you were unsure of.  
 4 Q. And when you join FSC in the first place do you sort of  
 5 pick it up on the job, how does it work?  
 6 A. FSC -- I have always been part of that kind of group  
 7 since I joined.  
 8 Q. Did they give you any special is training when you  
 9 joined, or did you ..?  
 10 A. We're going back a long time, but my special training of  
 11 such was when I was a PA so I was machining so yes, they  
 12 would give me special training.  
 13 Q. The purpose of your statement I think, as you explain at  
 14 paragraph 8 {E2/8/2}, is to explain how Post Office uses  
 15 Credence to investigate discrepancies.  
 16 A. Yes.  
 17 Q. "... since the introduction of Horizon and why". And at  
 18 paragraph 9 you have explained that:  
 19 "Credence is a system that shows all sales  
 20 transactions, log on and log off events and all  
 21 remittances in and out of Horizon."  
 22 Yes?  
 23 A. Yes.  
 24 Q. And we have seen already that paragraph 12 of your  
 25 witness statement {E2/8/3} says it is used to help -- if

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1 you look at the second line, that Mr De Garr Robinson  
 2 just took you to:  
 3 "It is used to help understand what has happened in  
 4 a branch as it records all keystroke activity performed  
 5 in that branch by the user ID, date and time."  
 6 Now, you have said that what you meant by that in  
 7 fact was sales and things like that?  
 8 A. Transactional data, yes.  
 9 Q. What information does it give above and beyond the ARQ  
 10 data that we have seen?  
 11 A. We -- for my team, which is the cheques team, where we  
 12 usually use Credence, is years ago we would have had to  
 13 ask a postmaster to send his cheque list in for us, if  
 14 we've got an open item to investigate. With Credence we  
 15 can save not going out to the postmaster, we can  
 16 actually have a look to see how postmasters finish  
 17 transactions off.  
 18 Q. And what he has typed in in the cheque list at the  
 19 branch and how it shows up or --  
 20 A. No, we actually look at all sales to see what  
 21 transactions he has finished off to cheques.  
 22 Q. So you don't have access to what we have seen is the ARQ  
 23 data that's being pulled from Fujitsu?  
 24 A. Mm-hm.  
 25 MR JUSTICE FRASER: Is that correct, you don't have access

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1 to that?

2 A. Not through Credence, no. We're just at the

3 transactional level.

4 MR GREEN: So can you explain to the court -- give the court

5 some understanding of what you can and cannot see. If

6 you're investigating, for example, a MoneyGram issue,

7 can you see exactly what the SPM has done in branch on

8 the screen in Credence?

9 A. With MoneyGram we have two sources of information and

10 that is MoneyGram's file and we use Horizon, we don't

11 actually use Credence for MoneyGram.

12 Q. Okay. What do you use Credence for?

13 A. Mainly cheques, part of my team.

14 Q. Now, Credence only holds information for a short period,

15 I think currently three months; that's right, isn't it?

16 A. That's right.

17 Q. And are you aware of discussions that have been had

18 about extending the period for which Credence holds

19 information to a longer period? Are you aware of any

20 discussions about extending the period that Credence

21 holds information for?

22 A. We know that we can view Credence up to three months.

23 There's also a system called Horace. So we can -- one

24 of my team members has access to Horace, so we would

25 look on there.

1 Q. Okay. Let's look if we may at {F/1092} please. Now,

2 this is a document from June 2013. You will see as at

3 2013 the branch data available as at that date was

4 available for 61 days. Is that the same today as far as

5 you know? Branch data available to you on Horizon? Do

6 you see at the top?

7 A. Yes, I thought ours was 90 days, Credence.

8 Q. Well, Credence is immediately underneath, Credence data

9 90 days.

10 A. Yes. But when you say branch data I'm not too sure --

11 Q. On Horizon.

12 A. Yes.

13 Q. How long is the data available to you on Horizon for?

14 A. On Horizon, if we have an open item it's there until we

15 investigate it.

16 Q. It can just stay on there for a long time?

17 A. Yes.

18 Q. And next to that it says:

19 "All transactional data including non-sales eg

20 adjustments."

21 So it's right, isn't it, that Credence doesn't just

22 show sales information, it also includes non-sales

23 information like any adjustments that somebody has made?

24 A. Yes.

25 Q. And so that gives a fuller picture --

1 A. Yes.

2 Q. -- than just seeing the sales information?

3 A. Yes.

4 Q. And that's why in your statement you have explained that

5 it helps to see what's happened in the branch?

6 A. That's it.

7 Q. And can you see that the -- under -- you can see what's

8 being considered there in bold. Do you see about

9 quarter of a way down from the top in bold:

10 "Consider the benefits of a repository of data for

11 24 months. Note: this is open for discussion but

12 24 months is the initial gambit."

13 Do you see that?

14 A. Yes.

15 Q. Would it be more helpful to you to have Credence data

16 available for longer?

17 A. We have -- there are some reports that we can still see

18 information for 24 months on Credence.

19 Q. Are there now?

20 A. Yes.

21 Q. Do you know when that was extended up to 24 months?

22 A. I don't, no, because I wasn't on these particular teams

23 at that time, because in 2003 I weren't on my job.

24 Q. You don't have to know the answers to the questions,

25 it's fine, but if you do it is helpful for the court to

1 know what the answer is.

2 Under "Business benefits" it says:

3 "The business, in particular the security and P&BA

4 departments suffer from the inability to interrogate its

5 data due to the short periods of retention."

6 Now, P&BA, what is P&BA now called?

7 A. It is now FSC.

8 Q. So that's your department that you work in?

9 A. Yes.

10 Q. And we can see that what's suggested there is "the

11 following areas should benefit", "POCA claims and

12 disputes". Can you tell the court what POCA is?

13 A. I don't know.

14 Q. If we go down and look at "Fraud and conformance

15 investigations", do you see that?

16 A. Yes.

17 Q. Is that something you have ever been involved in or not?

18 A. No.

19 Q. And then "SPMR contract advisors - re non-conformance

20 suspension hearings". Have you ever been involved in

21 anything like that?

22 A. No.

23 Q. And then if we go down, just underneath "Financial

24 benefits" you will see:

25 "ARQ (audit retrieval process) costs at least 384k



1 recurring annually. This is subsumed without breakdown  
 2 in the Fujitsu security management costs. 720 requests  
 3 @ £450 unit cost.”  
 4 I think you said earlier you don’t generally get the  
 5 ARQ data, is that right?  
 6 A. No.  
 7 Q. Have you ever worked in a team where someone has sought  
 8 the ARQ data?  
 9 A. I would imagine it’s when it’s the fraud team or the  
 10 security team.  
 11 Q. Something like that?  
 12 A. And they need more data.  
 13 Q. So we know that at least some reports on Credence are  
 14 now available for 24 months?  
 15 A. (Nods).  
 16 Q. Can you just give the court an indication of some  
 17 examples of those?  
 18 A. It’s usually regarding the automated payment, bill  
 19 payments.  
 20 Q. Automated bill payments?  
 21 A. Yes.  
 22 Q. So those reports are available for longer?  
 23 A. Yes.  
 24 Q. Are there any others that you can think of?  
 25 A. Not off the top of my head.

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1 Q. Don’t worry. It’s not Mastermind.  
 2 Now, can I ask you please to be shown {F/1120}.  
 3 This is a PEAK document about the Horizon computer  
 4 system. Do you ever see these in the course of your  
 5 work or not?  
 6 A. Me, no.  
 7 Q. Does anyone in your team ever have cause to look at  
 8 a PEAK?  
 9 A. No.  
 10 Q. No? Can I just ask you then -- I will take it quite  
 11 quickly, but if we look at the bottom of that first page  
 12 you will see the bottom paragraph underneath the word  
 13 "Details":  
 14 "The customer visited Kinglassie post office ... on  
 15 13 December 2012 ... to deposit 1,444.20 which didn't  
 16 credit their account. We can see from TESQA."  
 17 What's TESQA?  
 18 A. I've never worked on this team, but I'm aware that it's  
 19 another system that people -- there's more details on  
 20 that.  
 21 Q. As well?  
 22 A. Which is more restricted obviously for data protection  
 23 so it is only certain people that have access to that  
 24 data.  
 25 Q. And that's a separate system to Credence?

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1 A. Yes.  
 2 Q. "We can see from TESQA that the transaction failed at  
 3 the confirmation stage due to 'transaction abandoned by  
 4 clerk'. I've had numerous conversations with the office  
 5 and also sent out a letter and evidence but the office  
 6 has now requested a transaction log. With it being so  
 7 long ago they can't provide an explanation as to why the  
 8 transaction didn't complete (but state they didn't have  
 9 a surplus at the time of the transaction). If we could  
 10 ascertain what buttons were pressed by the clerk we  
 11 could go back with an explanation as to what the clerk  
 12 did with this transaction and hopefully get a conclusion  
 13 to this enquiry."  
 14 Do you see that?  
 15 A. Yes.  
 16 Q. Now, it would be helpful, wouldn't it, when you have  
 17 those sorts of issues if you could identify as much  
 18 information about exactly what had happened in branch as  
 19 possible?  
 20 A. I can't answer for that particular enquiry. On cheques  
 21 we have the information that we require to investigate.  
 22 Q. You do?  
 23 A. Yes.  
 24 Q. Even if it is a long time afterwards? If someone raises  
 25 it say 102 days later for the first time?

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1 A. If we issued a transaction correction to the office, we  
 2 put our details on there and if they had an enquiry or  
 3 dispute something they would phone the duty (inaudible)  
 4 up for more information.  
 5 Q. But I think what has happened here, on the face of it --  
 6 and this is not a cheque case, but what appears to have  
 7 happened here is that it has been raised -- can you see  
 8 that the incident is raised on 30 August 2013?  
 9 A. Yes.  
 10 Q. And it relates to a visit on 13 December 2012, do you  
 11 see that?  
 12 A. Yes.  
 13 Q. So we can see that more than 90 days has elapsed from  
 14 the visit of the customer to the time when the issue has  
 15 arisen and if you looked on Credence you wouldn't be  
 16 able to see the details of the original visit, would  
 17 you, after longer than 90 days?  
 18 A. No.  
 19 Q. Do you know how long you can see the details on TESQA  
 20 for?  
 21 A. No.  
 22 Q. You don't. Okay.  
 23 Now, if you just go over the page at {F/1120/2}, you  
 24 see at the top of the page:  
 25 "We need sight of the actual transaction retrieving

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1 from the archives (this is required to disprove any  
 2 future claim against Horizon integrity via the clerk)."  
 3 Was it your experience at all that there was any  
 4 defensiveness about the Horizon system when it was  
 5 challenged by SPMs?  
 6 A. If a postmaster challenged in the area that I worked in,  
 7 we always took them seriously --  
 8 Q. You did?  
 9 A. -- and we always looked at what they were actually  
 10 saying and then we would go back to our evidence of  
 11 issuing the TC.  
 12 Q. Okay. Can we look at your paragraph 13 please {E2/8/3}.  
 13 You can see there, third line:  
 14 "For example, a subpostmaster might telephone FSC  
 15 and/or the helpline and allege to Post Office that  
 16 he/she has done a reversal."  
 17 Yes?  
 18 A. Yes.  
 19 Q. That's an SPM claiming to have done something. The way  
 20 that is expressed suggests some doubt a little bit,  
 21 doesn't it, about the truth of what they're saying?  
 22 A. I think what I was trying to get across in this  
 23 particular statement was if a postmaster had a query, he  
 24 could always phone us and we would try and help,  
 25 whatever his query was. That's what I was trying to

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1 explain in this.  
 2 Q. Okay. Let's look if we may at paragraph 14. You say  
 3 there:  
 4 "In relation to Mr Coyne querying whether Credence  
 5 could contain errors that result in false TCs being  
 6 issued to branches which they cannot effectively  
 7 challenge, as I am an end user of Credence I cannot  
 8 really comment on this. However I've never heard of  
 9 a bug in Credence in my time at Post Office."  
 10 So that's not something you are in a position to  
 11 comment on?  
 12 A. No.  
 13 Q. Okay. Let's move forward if we may please. Let's look  
 14 please at {F/869}. This is an Ernst & Young management  
 15 letter for the year ended 27 March 2011 and I expect you  
 16 may not have seen that before, is that fair?  
 17 A. That's fair.  
 18 Q. Can we go to page 4 please {F/869/4} and just to show  
 19 you the layout of the table, the first column has  
 20 a number in it, the second column says "Issue", although  
 21 it is a bit strangely laid out, do you see?  
 22 A. Yes.  
 23 Q. "Location", "Background", "Recommendation", "Management  
 24 comment" and then the right-hand column is "Current year  
 25 update", do you see that?

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1 A. Yes.  
 2 Q. And let's look at page 12 at point 12 please {F/869/12}.  
 3 Point 12 says "Credence (back-end) change process" and  
 4 you can see there it says:  
 5 "During our walkthrough and testing of the change  
 6 control procedures for the Credence application we  
 7 became aware of the following issues:  
 8 "1. Developers at Logica, the third party provider  
 9 of application development and support for Credence, had  
 10 access rights to the production environment and the  
 11 database that would permit developers to move their own  
 12 changes into the production environment.  
 13 "2. Documentation to approve fixes and patches that  
 14 are applied to Credence outside of the release process  
 15 does not always exist. We were advised by Logica  
 16 personnel that for a sample of four changes selected  
 17 evidence of approval to move into production did not  
 18 exist and that it would not be possible to link the  
 19 changes to problem tickets to record the original  
 20 request for the fix ..."  
 21 Then:  
 22 "Developers have access to move their own changes  
 23 into production and [if] documentation is not retained  
 24 to substantiate those changes there is a risk of loss of  
 25 data and application integrity due to either

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1 unauthorised, erroneous or inappropriate changing made  
 2 to the production environment."  
 3 I'm not suggesting somebody read anything as  
 4 complicated as that out to you, but were you aware at  
 5 all in or around 2011 or thereafter of any concerns  
 6 about the integrity of the information on Credence?  
 7 A. No.  
 8 Q. Okay. Let's look at page 14, point 13 {F/869/14}. This  
 9 is "Credence (front end) change process" and we can see  
 10 some issues identified in the column where there is  
 11 a number 137 and in fact over on the right-hand side it  
 12 says:  
 13 "Application not in audit scope for [financial  
 14 year 11]. Therefore we are not able to comment on  
 15 whether management has fully addressed our comment as  
 16 raised in the prior year."  
 17 You didn't see any particular changes in Credence  
 18 around 2011 or soon thereafter?  
 19 A. To be honest, I wasn't working in this area in 2011.  
 20 Q. What area were you -- were you using Credence at all at  
 21 that time?  
 22 A. Not at that particular time, no.  
 23 Q. You weren't, okay.  
 24 Before reading Mr Coyne's report were you aware that  
 25 there is a time discrepancy between the Credence and the

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1 Fujitsu data?  
 2 A. What do you mean?  
 3 Q. One is GMT and one is British Summer Time for half the  
 4 year. Did you know about that?  
 5 A. No.  
 6 Q. No. Fair enough.  
 7 Let's look at the use and content of Credence data.  
 8 If we look at {F/935}, and you can see that that  
 9 document is called "Driving business benefits through  
 10 the consolidation of data review" and dated 18 May 2012.  
 11 Can I just ask you at what date did you move into  
 12 a role where you started using Credence yourself?  
 13 A. Probably 2016.  
 14 Q. Okay, so this is --  
 15 A. '17, yes.  
 16 Q. -- before your time as well, okay.  
 17 So I will leave that.  
 18 Paragraph 15 of your witness statement {E2/8/3}  
 19 says:  
 20 "Looking at the Helen Rose report referred to in  
 21 paragraph 5.49 of Mr Coyne's report, Post Office was  
 22 able to use Credence to identify that the subpostmaster  
 23 had reversed a transaction but had also taken £76.09  
 24 payment from the customer."  
 25 And you have I think made an amendment to that and

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1 if we look at E2/16 and we go forward one page {E2/16/2}  
 2 you can see that paragraph 15 now reads -- "Post Office  
 3 was able to use Credence" should now be "Post Office  
 4 initially used Credence". And then there is the  
 5 addition of a sentence at the end that says:  
 6 "However, page 2 of the Helen Rose report shows that  
 7 the reversal 'was not an explicit reversal by the  
 8 clerk."  
 9 Now, first of all, you are talking about the  
 10 Helen Rose report; is that something that you actually  
 11 knew about yourself?  
 12 A. No. In this particular incident though when there was  
 13 not an error in the core finance, why this came about  
 14 was because the customer contacted the helpline because  
 15 the bill was unpaid.  
 16 Q. Yes. And if we look at how your paragraph 15 naturally  
 17 reads {E2/8/3}, if we look at the last sentence there,  
 18 do you see it says:  
 19 "In reversing the transaction, the subpostmaster had  
 20 effectively removed the payment to British Telecom,  
 21 making the bill unpaid."  
 22 A. Yes and it was the system that removed it, not the  
 23 postmaster, yes.  
 24 Q. It wasn't the subpostmaster. You hadn't appreciated  
 25 that from the Helen Rose report --

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1 A. No.  
 2 Q. -- because the Helen Rose report wasn't really something  
 3 you knew about?  
 4 A. No. But it was the recovery process that reversed --  
 5 Q. Could have done it?  
 6 A. Yes.  
 7 Q. So that amendment has now been made to reflect that?  
 8 A. Yes. And the transaction correction was issued because  
 9 the customer's money was still in the branch, so by  
 10 issuing the transaction correction the AP team was able  
 11 to then repay the customer's bill.  
 12 Q. And at paragraph 18 {E2/8/4}, somehow ARQ requests has  
 13 come into your witness statement.  
 14 A. Yes.  
 15 Q. It's not really your thing, is it?  
 16 A. No.  
 17 Q. Not really. I want to be fair to you about how I ask  
 18 it. It says there:  
 19 "I understand that Mr Coyne has alleged that  
 20 Post Office staff were deterred from making ARQ requests  
 21 because of fees or penalties."  
 22 Yes?  
 23 A. Yes.  
 24 Q. Did someone point that out to you in Mr Coyne's report,  
 25 or did they just tell you that that's what he had said?

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1 A. I have been always aware that Post Office Limited teams  
 2 can ask for this information, because many years ago we  
 3 didn't have Credence and we would ask for these, but  
 4 I've never been aware of anybody being deterred from  
 5 making requests.  
 6 Q. But no one in your team actually does that?  
 7 A. No, because we have the information at hand that we  
 8 require.  
 9 Q. And you can see things on Credence that the SPM can't  
 10 see and so you try and deal with their queries?  
 11 A. We can see the same information. Ours is probably more  
 12 easily readable.  
 13 Q. In a spreadsheet form?  
 14 A. In a spreadsheet format.  
 15 Q. Not on a till roll?  
 16 A. Not on a till roll.  
 17 Q. And you say that you have spoken to Mr Godeseth. He is  
 18 actually giving evidence, isn't he?  
 19 A. As I have put "I understand from a witness statement",  
 20 I didn't actually speak to him.  
 21 Q. I'm so sorry, you are right, you say "I understand the  
 22 witness statement contains details".  
 23 A. Yes.  
 24 Q. Then you say -- the reason I thought you might have  
 25 spoken to him is three lines from the bottom, "He is not

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1 aware of any fees or penalties having been paid". Is  
 2 that just from his witness statement --  
 3 A. That's it, yes.  
 4 Q. -- you haven't spoken to him?  
 5 Can we look please at {F/728}. This is an email  
 6 chain in relation to the Barkham Post Office, which was  
 7 Pam Stubbs' Post Office, and if we go please to page 11  
 8 {F/728/11}, you can see there:  
 9 "If we can encourage Mark Dinsdale to authorise the  
 10 audit trail, I feel it would be beneficial given the  
 11 current interest in Horizon from media and MPs."  
 12 If we go to page 9 {F/728/9}, we get:  
 13 "Nigel, no probs with requesting data from Fujitsu  
 14 but it will take around 3 weeks. Has Jason agreed to  
 15 take this case on, because we don't hand over Horizon  
 16 logs to an SPMR. It needs an expert to understand what  
 17 it says, and usually this requires one of the  
 18 investigators.  
 19 "I'll give Jason a call in the morning, then I will  
 20 raise an ARQ from Fujitsu.  
 21 "Is this for our benefit, as there is a cost  
 22 attached to ARQ requests, we do get a supply free of  
 23 charge as part of the contract but we usually don't have  
 24 enough, therefore we usually charge the defence  
 25 lawyers."

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1 Now, does that chime with anything that you have  
 2 experienced?  
 3 A. No.  
 4 Q. Let's have a look, if we may -- well, I may not need to  
 5 take you to it, but you're not aware of the charging  
 6 regime at all yourself, are you?  
 7 A. I was aware Post Office had a certain amount and then  
 8 they could be chargeable.  
 9 Q. So you were aware they had a certain amount after which  
 10 they would be charged?  
 11 A. Yes.  
 12 Q. But you didn't know yourself what that amount was?  
 13 A. The charge? I have no idea, no.  
 14 Q. And you didn't know how many requests they could make  
 15 before they were charged?  
 16 A. No. If we needed to make a request, I knew we could.  
 17 Q. I'm grateful.  
 18 My Lord, I have no further questions.  
 19 MR JUSTICE FRASER: Mr De Garr Robinson?  
 20 Re-examination by MR DE GARR ROBINSON  
 21 MR DE GARR ROBINSON: Mrs Mather, I just have a question  
 22 about paragraph 19 then. It is a potential for  
 23 confusion that you might be able to clear up.  
 24 Paragraph 19 of your witness statement {E2/8/4}.  
 25 Mr Green asked you about information you had obtained

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1 from Mr Godeseth and you said you had just read his  
 2 statement.  
 3 A. Yes.  
 4 Q. And then you referred to some information at the end of  
 5 that paragraph where it says:  
 6 "He is not aware of any fees or penalties having  
 7 been paid by Post Office, nor anyone being deterred from  
 8 making ARQ requests ..."  
 9 In that sentence who is "he"?  
 10 A. I think it's Christopher Knight.  
 11 Q. So it's not Mr Godeseth?  
 12 A. No.  
 13 Q. And is that information as a result of your having  
 14 spoken to Mr Knight?  
 15 A. Yes.  
 16 Q. Thank you.  
 17 My Lord, I have no further questions.  
 18 Questions from MR JUSTICE FRASER  
 19 MR JUSTICE FRASER: I just have a couple of questions.  
 20 The one that you have just been asked by counsel  
 21 about Mr Christopher Knight, is there any reason of  
 22 which you are aware why you are telling us what  
 23 Mr Christopher Knight believes rather than Mr Knight  
 24 himself giving a witness statement?  
 25 A. I have no idea.

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1 MR JUSTICE FRASER: You don't know.  
 2 Then if we could go back please to your paragraph --  
 3 well, it's really your experience of Credence  
 4 altogether.  
 5 How often do you use Credence?  
 6 A. My team use it every day.  
 7 MR JUSTICE FRASER: And how often do you use it?  
 8 A. Perhaps once a week. I know my way round Credence.  
 9 MR JUSTICE FRASER: You know your way round it.  
 10 A. Yes.  
 11 MR JUSTICE FRASER: And what is keystroke activity?  
 12 A. I didn't realise that keystroke activity actually refers  
 13 to these ARQ reports where we do the transactional data  
 14 on Credence; that's what we're looking at, the sales and  
 15 the non-sales. So I meant transactional data.  
 16 MR JUSTICE FRASER: So your understanding of keystroke  
 17 activity when you did your statement was what?  
 18 A. Transactional data, sales and non-sales. So for every  
 19 transaction that a postmaster -- for example somebody  
 20 paid their bill, we would see that level of detail and  
 21 how the transaction was finished, either to cash,  
 22 cheque, debit card. So it's the transactional data over  
 23 the Horizon counter.  
 24 MR JUSTICE FRASER: Right, so if I look at your paragraph 12  
 25 {E2/8/3} -- do you have that?

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1 A. Yes.  
 2 MR JUSTICE FRASER: You see the sentence that you have been  
 3 asked about a couple of times --  
 4 A. Yes.  
 5 MR JUSTICE FRASER: -- firstly by Mr De Garr Robinson and  
 6 then by Mr Green. Just so that I can understand what  
 7 your evidence is, that second sentence that begins "It  
 8 is used to help understand ...", I understand I should  
 9 cross out "all keystroke activity", is that right?  
 10 A. Yes.  
 11 MR JUSTICE FRASER: And what term should I put in there  
 12 instead?  
 13 A. What we use Credence for is we have also got -- for  
 14 cheques is all cheques are processed at a processing  
 15 centre which they then create a file. So for example if  
 16 we had ten cheques processed we would look on Credence  
 17 for ten transactions that were finished off to cheques,  
 18 so ten versus ten and then if we've got a mismatch  
 19 that's what we would be looking for. For example one  
 20 could be finished off to cash accidently and we would  
 21 try and identify that.  
 22 MR JUSTICE FRASER: But going back to my question, what term  
 23 should I put in instead of "all keystroke activity"? Is  
 24 there a handy or useful form of words that would correct  
 25 that sentence to reflect what you meant?

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1 A. Records all transactional data performed in that branch.  
 2 MR JUSTICE FRASER: All transactional data performed in that  
 3 branch. Okay.  
 4 And then the next question, which is more or less on  
 5 the same topic, in the next paragraph you have  
 6 a sentence that begins at the end of line 4 which says:  
 7 "We can take an initial look on Credence to see  
 8 whether that is correct or whether, for example, the  
 9 subpostmaster has in fact done an adjustment."  
 10 Do you see that?  
 11 A. Yes.  
 12 MR JUSTICE FRASER: Can you just explain to me how you would  
 13 do that?  
 14 A. For example, if one of -- a postmaster phoned one of my  
 15 team, they might think that they have done a reversal,  
 16 but by the duty (inaudible) they would be able to go on  
 17 to Credence, download the information and look on  
 18 non-sales and they might have actually done an  
 19 adjustment.  
 20 MR JUSTICE FRASER: And is that something that you would be  
 21 involved in looking at, or would it be someone in your  
 22 team?  
 23 A. It would be my team members.  
 24 MR JUSTICE FRASER: And could you do that if you wanted?  
 25 A. If I wanted to, I could, yes.

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1 MR JUSTICE FRASER: And what would it show? What would you  
 2 expect to see in your example?  
 3 A. That's where -- for an adjustment it's when they can  
 4 adjust cash to cheque or cheque to cash.  
 5 MR JUSTICE FRASER: Right. That's very useful. Thank you  
 6 very much.  
 7 Any questions arising out of that? No.  
 8 Thank you very much for coming, Mrs Mather, that's  
 9 the end of your evidence.  
 10 MR DE GARR ROBINSON: My Lord, I call Paul Smith.  
 11 MR JUSTICE FRASER: Yes.  
 12 MR PAUL SMITH (affirmed)  
 13 MR JUSTICE FRASER: Thank you very much, Mr Smith. Do have  
 14 a seat please.  
 15 A. Thank you, my Lord.  
 16 Examination-in-chief by MR DE GARR ROBINSON  
 17 MR DE GARR ROBINSON: Mr Smith, there should be a bundle of  
 18 documents in front of you. If I could ask you to open  
 19 that bundle and go to divider 9 please {E2/9}. There  
 20 should be one sheet with a correction in it and after  
 21 that sheet there should be a document describing itself  
 22 as a "Witness statement of Paul Ian Michael Smith", do  
 23 you see that?  
 24 A. Yes.  
 25 Q. And is that your name and address on the first page of

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1 the witness statement?  
 2 A. It is.  
 3 Q. And at the end of the witness statement -- it is page 7  
 4 {E2/9/7} -- is that your signature?  
 5 A. It is.  
 6 Q. And then if I could ask you to move on in the bundle to  
 7 what I hope is tab 15 -- is there a tab 15 in that  
 8 bundle? {E2/15}  
 9 A. There is.  
 10 Q. And another witness statement with your name and address  
 11 on the first page and on the second page is that your  
 12 signature? {E2/15/2}.  
 13 A. It is.  
 14 Q. Subject to the correction on the first sheet relating to  
 15 the first witness statement, do you confirm that the  
 16 witness statements are true to the best of your  
 17 knowledge, recollection and belief?  
 18 A. They are.  
 19 Q. If you would wait there, thank you.  
 20 Cross-examination by MR GREEN  
 21 MR GREEN: Mr Smith, we have heard how you discussed the  
 22 information about transaction corrections with various  
 23 colleagues and one of them was Dawn Phillips.  
 24 A. It was.  
 25 Q. And can I just take you please to your witness statement

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1 at {E2/9/3} at paragraph 13. So you have introduced TCs  
 2 at paragraph 12.  
 3 A. Mm-hm.  
 4 Q. And it says:  
 5 "TCs are issued by FSC. I understand from  
 6 Post Office's solicitors that the processes by which FSC  
 7 determines whether a TC is required is outside the scope  
 8 of the Horizon issues trial."  
 9 A. Okay.  
 10 Q. That's what you were told?  
 11 A. Yes.  
 12 Q. And then you said:  
 13 "Broadly, it involves FSC comparing data entered  
 14 onto Horizon by branch staff with data received from  
 15 other sources and resolving any discrepancies between  
 16 them."  
 17 Now, pausing there, there are -- I think as we have  
 18 already heard -- separate teams for different potential  
 19 discrepancies?  
 20 A. Agreed.  
 21 Q. And you have explained at paragraph 14 that:  
 22 "FSC is divided into distinct teams that are  
 23 responsible for accounts relating to specific products."  
 24 A. They are.  
 25 Q. So one team might be dealing with Santander

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1 discrepancies, for example?  
 2 A. Indeed.  
 3 Q. Another team might be dealing with lottery and so forth?  
 4 A. Absolutely.  
 5 Q. And you say that:  
 6 "Although each team have their own responsibilities,  
 7 there is interaction between teams to reach a final  
 8 resolution on any discrepancy."  
 9 A. There is.  
 10 Q. When would that typically occur?  
 11 A. That would occur when there is evidence within the  
 12 investigation that there could be a further activity  
 13 that's needed. As an example, we have already heard  
 14 about cheques. It could be that the impact of a cheque  
 15 discrepancy could also impact on another product, so if  
 16 you have a miskey it could be that that miskey  
 17 transaction has been settled to cheque with higher than  
 18 what it should be value, but then there's also going to  
 19 be the bill payment or the actual transaction itself  
 20 that's also been at a higher value. So working together  
 21 you can put together all the pieces of the puzzle, get  
 22 the right answer and also mitigate or minimise the  
 23 impact on the branch by making sure that any corrections  
 24 that are done are done at the same time to ensure that  
 25 the financial impact is either mitigated or reduced.

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1 Q. Yes. It is obviously ideal if both sides can be done at  
 2 the same time.  
 3 A. Absolutely.  
 4 Q. And the subpostmaster is not hit with a TC going one way  
 5 and then another way.  
 6 A. Why he.  
 7 Q. But that does happen sometimes?  
 8 A. I cannot give you an example --  
 9 Q. Okay.  
 10 A. -- but I can't deny it either.  
 11 Q. At paragraph 16 you say:  
 12 "Post Office introduced a case management system  
 13 that records each individual challenge to a TC ..."  
 14 Yes?  
 15 A. It records some challenges to TCs. It is still  
 16 something that's in roll-out. It was introduced on that  
 17 date. There are a number of teams that are on there and  
 18 challenges to TCs are recorded in there, yes.  
 19 Q. So taking it in stages, it was introduced  
 20 in September 2018?  
 21 A. Agreed.  
 22 Q. And when is roll-out of that system due to be complete  
 23 across all teams?  
 24 A. I can't give you a date. I don't know a date.  
 25 Q. Okay. And how many teams are there in total? Roughly?

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1 A. Roughly I would say eight.  
 2 Q. Eight. And do you know how many teams are using that  
 3 system at the moment?  
 4 A. I know that there are two teams which are high volume  
 5 users that are fully integrated in there and there are  
 6 a number of teams which have maybe part of their  
 7 processes in there. As I explained previously, teams  
 8 have distinct areas of responsibility. It could be that  
 9 a product is integrated but the whole team isn't.  
 10 Q. Okay. Which are the two teams that are high volume  
 11 users?  
 12 A. The automated payments team and the team that deals with  
 13 debit cards, lottery and ATM.  
 14 Q. And do you know whether they are using it to record all  
 15 challenges or just some challenges?  
 16 A. As far as I'm aware, all challenges.  
 17 Q. Okay. And do you know whether that case management  
 18 system actually tracks any trends or if there's any  
 19 analysis of the figures?  
 20 A. The case management system itself doesn't because it's  
 21 a case management system, it's there to record.  
 22 However, there are reports being developed that are  
 23 showing some trends. I do know that the lottery, ATM  
 24 and debit card team leader has requested a number of  
 25 reports and is using them to get to the bottom of what

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1 may have happened.  
 2 Q. So there are actually reports you can use now?  
 3 A. There are reports written for those specific products.  
 4 Q. For those products --  
 5 A. Yes.  
 6 Q. -- that exist now --  
 7 A. Yes.  
 8 Q. -- and are being used?  
 9 A. As far as I'm aware, yes.  
 10 Q. Did you think it might be useful to have a look at  
 11 those, or did you not look at them because of what you  
 12 were told by the solicitors, that how it was done wasn't  
 13 in scope?  
 14 A. Neither is accurate. These reports were generated very  
 15 recently. As I say, this is a system that has been  
 16 developed, it is in place, but the actual uptake by  
 17 teams is being done on a step-by-step basis and as  
 18 improvements are made, reports are written. It's  
 19 running quite well but organically.  
 20 Q. It is fair to say that your most recent witness  
 21 statement is pretty recent as well, isn't it?  
 22 A. It is.  
 23 Q. 8 March.  
 24 A. It is.  
 25 Q. So you could have captured information in that witness

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1 statement about the trends and --  
 2 A. That witness statement was to address specific comments  
 3 within there that following understanding from looking  
 4 at Mr Coyne's report, relooking at my statement, which  
 5 is the right thing to do, it indicated that -- as per  
 6 Dawn Phillips' testimony earlier that there was  
 7 information in there that wasn't fully explained  
 8 regarding notices.  
 9 Q. Two things, Mr Smith. I know what's in the witness  
 10 statement. I was just pointing out that first of all  
 11 it's not quite things that weren't fully explained.  
 12 There was something in there that was wrong that you had  
 13 to correct. Can we be clear about that?  
 14 A. Terminology, I will agree, was wrong.  
 15 Q. It was wrong?  
 16 A. Yes. The facts and the figures I would dispute were  
 17 wrong.  
 18 Q. Right. Well --  
 19 MR JUSTICE FRASER: Sorry, so you are saying the facts are  
 20 correct and the figures are correct?  
 21 A. My Lord, as per Dawn's previous testimony she did say  
 22 that the information that she provided, the information  
 23 on error notices, the volumes that she provided, were  
 24 accurate and that's all that I can work on.  
 25 MR JUSTICE FRASER: But if the description of what those

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1 figures is incorrect then you are maintaining that  
 2 the content of the statement is correct, are you?  
 3 A. The statement wasn't -- it wasn't correct, my Lord. It  
 4 was referring to error notices not transaction  
 5 corrections.  
 6 MR JUSTICE FRASER: Right, Mr Green.  
 7 MR GREEN: I'm grateful.  
 8 And in fact the heading in the second box, if we  
 9 look at paragraph 23 on page 5 {E2/9/5}, the heading  
 10 "Disputes received from branch" was specifically wrong,  
 11 wasn't it?  
 12 A. It was, yes.  
 13 Q. Because it was actually "Disputes received by Santander  
 14 from PO"?  
 15 A. It was, yes.  
 16 Q. So that the question I was originally asking you was you  
 17 said that you didn't include anything about the  
 18 transaction correction system or any analysis about TCs  
 19 and so forth from the system because the reports were  
 20 quite recent. I showed you the date of your statement  
 21 which was the Friday before this trial started and  
 22 I suggested that was recent. I'm just going to suggest  
 23 again that would have been an opportunity for you to put  
 24 something in about how those were working. Was there  
 25 a reason why you didn't?

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1 A. There wasn't.  
 2 Q. Okay. And there aren't any underlying documents  
 3 produced or exhibited with your statement to support  
 4 these tables, are there?  
 5 A. There isn't I'm afraid.  
 6 Q. So just to get a feel for how this was done, if we look  
 7 at paragraph 17 which is {E2/9/4}, "Cash bureau and  
 8 personal banking team", the people that you spoke to or  
 9 contacted were Sarah Parkes and Gillian Hoyland, is that  
 10 right?  
 11 A. It was.  
 12 Q. What did you do, did you email them, did you talk to  
 13 them, did you call them, did you meet them; what  
 14 happened?  
 15 A. There was an email that was quite explicit as to the  
 16 information I required and I did do follow up emails and  
 17 on occasion I would speak to people.  
 18 Q. On occasion you would speak to people?  
 19 A. Yes.  
 20 Q. Did you speak to Sarah Parkes?  
 21 A. I didn't speak to Sarah Parkes, no.  
 22 Q. Did you speak to Gillian Hoyland?  
 23 A. From memory, I did, yes.  
 24 Q. And which aspect did you speak to her about?  
 25 A. Just to request that the information was provided, to

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1 explain what the information was needed for and that it  
 2 was time critical because I was still awaiting the data  
 3 at the time.  
 4 Q. And you've got these average numbers. Was there  
 5 a reason why the period was different between the cash  
 6 and the bureau figures?  
 7 A. That's not something I'm aware of.  
 8 Q. You don't know?  
 9 A. I don't know.  
 10 Q. And it suggests there that there are 680 disputes,  
 11 paragraph 18, 40 upheld. And you understand that the  
 12 disputes tend to relate to alleged shortages in pouches  
 13 received by branches and they are dealt with at the cash  
 14 centre as opposed to FSC?  
 15 A. That's right.  
 16 Q. Who did you gain that understanding from? Was that  
 17 something that Gillian Hoyland told you?  
 18 A. That would have come from an email and I cannot remember  
 19 who sent me the email at this stage.  
 20 Q. Okay. Let's look at personal banking for a moment, if  
 21 we may. TCs by the personal banking team are rarely  
 22 disputed, we see there.  
 23 A. Mm-hm.  
 24 Q. "This is because they run a report in Horace to  
 25 determine whether a surplus is evident (ie if the cash

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1 physically counted is more than the amount that appears  
 2 on Horizon or vice versa) before issuing a TC."  
 3 Where has that come from?  
 4 A. That information is likely from Sarah Parkes but, as  
 5 I have suggested earlier, I cannot 100% say which one of  
 6 them provided that detail by email.  
 7 Q. Okay. Camelot, debit card and ATM team, Andrea Green.  
 8 {E2/9/5):  
 9 "The Camelot, debit card and ATM team had the  
 10 following number of TCs disputed and issued the  
 11 following number of compensating TCs in the 2017  
 12 financial year."  
 13 We have a table there. Again, there is no  
 14 underlying document provided?  
 15 A. No.  
 16 Q. How did Andrea Green give you this information?  
 17 A. Andrea Green will have sent this as an email which  
 18 I will have forwarded on to our solicitors.  
 19 Q. And it just says -- under "BOI retracts" and "Lottery"  
 20 the number of TCs issued for those two is very  
 21 different, isn't it: 4,174 and lottery is 24,139?  
 22 A. It is.  
 23 Q. But the number of disputed TCs apparently is estimated  
 24 to be the same?  
 25 A. It appears so, yes.

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1 Q. And the number of compensating TCs is also estimated to  
 2 be identical?  
 3 A. It appears so, yes.  
 4 Q. Do you have any feel at all from your own knowledge as  
 5 to whether those figures are even remotely reliable?  
 6 A. The number of issued TCs I would suggest are very  
 7 accurate. The number of TCs disputed is not something  
 8 that I can comment on at this stage. I do know that  
 9 prior to having our case management system in there was  
 10 no consistent method of recording the method of  
 11 disputes.  
 12 Q. You say in paragraph 21 what your colleague Andrea Green  
 13 has told you. So just working out the information  
 14 flow --  
 15 A. Yes.  
 16 Q. -- it's you got it from Andrea and she got it from  
 17 various experienced team leaders?  
 18 A. Team members.  
 19 Q. Team members. Did she tell you who they were at all?  
 20 A. She didn't.  
 21 Q. Okay. So it's hop over to Andrea Green and then another  
 22 hop over to some other team members who are not  
 23 identified?  
 24 A. Yes.  
 25 MR JUSTICE FRASER: That's really a point for me, Mr Green.

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1 MR GREEN: I'm grateful, my Lord.  
 2 So do you think there was scope for other  
 3 misunderstandings between you and the people you have  
 4 asked of the same sort as that which has emerged with  
 5 Dawn Phillips?  
 6 A. It is unlikely. I cannot say categorically no, but the  
 7 contract and the way that we work with Santander is  
 8 significantly different to how we work on the other  
 9 products. Many of the other products are very, very  
 10 similar in how they are administered, there's just  
 11 different methods of investigation and additional  
 12 different types of data available.  
 13 Q. Okay. Can we just go over the page please to page 6 in  
 14 your witness statement {E2/9/6}. DVLA:  
 15 "Jacqueline has explained to me that TCs are very  
 16 rare in this team. During the past year the team have  
 17 only issued four and none of them have been disputed."  
 18 Now, you understand that this trial concerns the  
 19 operation of the system over a long period?  
 20 A. Yes.  
 21 Q. Could we look at {F/1889} please. Sorry, I hope I've  
 22 got the right reference. We can come back to that  
 23 reference in a minute, if we can just check it. It is  
 24 the spreadsheet of TCs issued by branch. We can come  
 25 back to that in a second.

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1 If we can just go in the meanwhile to paragraph 30  
2 of your witness statement [E2/9/6] we see a reference to  
3 paragraph 6.66 of a report by Mr Coyne in which he  
4 refers to two TCs of £810,000 in a Post Office Limited  
5 disclosed document and suggests they might have been  
6 made in error. You say:  
7 "This is not correct. Two TCs were required in this  
8 instance because the method of payment used was cheque."  
9 Then:  
10 "TCs to the value of 810,00 are directly linked and  
11 relate to a Bank of Ireland Post Office Savings Account  
12 deposit on 24 August 2012."  
13 Let's quickly look at that. It seems to be right.  
14 If we look at {F/1195} please. You had a look at that  
15 Excel spreadsheet anyway to look at the two --  
16 A. I did.  
17 Q. There's an 810 and 810 at the top and the bottom, isn't  
18 there?  
19 A. There is.  
20 Q. And they cancel each other out. What I wanted to ask  
21 you about is -- while that downloads -- it might  
22 download in the background if we go to another document.  
23 Shall we just look at {D3/1/205} please. Let's get the  
24 spreadsheet, thank you very much.  
25 Can we go to the original data {F/1195} and there

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1 we've got a long list of individual TCs issued in 2012,  
2 with the date they are issued, going into 2013, the  
3 early part of 2013, so it looks like the 2012/2013-year,  
4 is that what you understood?  
5 A. I haven't seen the full detail of this report, but it  
6 does appear that way.  
7 Q. And if we go to the pivot table, the pivot report tab at  
8 the bottom we can see there are 84,217 transaction  
9 corrections recorded there, yes?  
10 A. Yes.  
11 Q. Could we please go to {D3/1/205}. Now, this is  
12 Dr Worden's report, who is the expert for Post Office,  
13 and he has reproduced a table which was produced by  
14 Post Office in accordance with an order that the court  
15 made for provision of this information. When we look at  
16 the volume of TCs in 2012 it says 124,374 and when we  
17 look in 2013 it says 105,876 and we can see that the  
18 moving average in that period is a lot higher than the  
19 figure that we saw in the financial year 2012/2013. Are  
20 you aware of any reason why the numbers in what appear  
21 to be a calendar year might be very significantly  
22 different, other than the fact that the financial year  
23 starts and ends at a different time?  
24 A. I know of no other difference other than it would be  
25 significantly different based on that premise.

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1 Q. Can I ask you whether you have seen this document before  
2 please?  
3 A. I don't recognise it, no.  
4 Q. Have a look at page {H/58}. This is the document as  
5 originally presented and sent through. If we look at  
6 {H/57}, you can see what's said about this. Just come  
7 down to the third paragraph:  
8 "Post Office does not hold historic aggregated TC  
9 data in a single searchable database, in Horizon or  
10 otherwise."  
11 We have seen that 2012 spreadsheet of all those  
12 transaction corrections individually and for what it's  
13 worth I have checked that there are 87,000 of them.  
14 Have you seen other spreadsheets of transaction  
15 corrections similar to that for different years?  
16 A. Similar to that, no.  
17 Q. The one we looked at which had the 810 and the 810 that  
18 you specifically looked at to check what Mr Coyne was  
19 saying?  
20 A. Not in that layout, no, but Post Office do hold a --  
21 I will loosely call it a database, it's a SharePoint  
22 site, with Excel spreadsheets on that have been created  
23 to hold transaction corrections, which our -- one of the  
24 teams within Post Office appends to daily to create that  
25 list.

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1 Q. Which department is in charge of that list? Who is the  
2 owner of it? I see it is on a SharePoint site, but who  
3 would be the natural person to talk about that list if  
4 they were asked?  
5 MR JUSTICE FRASER: You have asked five questions, one after  
6 the other.  
7 MR GREEN: I'm sorry.  
8 MR JUSTICE FRASER: Do you want to maybe put it as one  
9 question.  
10 MR GREEN: Who would be the natural person to speak to that  
11 list and explain it?  
12 A. It will be somebody in the systems management team.  
13 Q. Okay. Can I ask you whether you had any involvement in  
14 or about May 2018 in looking at any of those sorts of  
15 documents to compile a table of how many transaction  
16 corrections there had been?  
17 A. It's possible. I cannot explicitly remember, but  
18 I could have.  
19 Q. You can't remember?  
20 A. No, not at this stage.  
21 Q. Can we just look at {F/889}, which is my missed note.  
22 Can we look please at the "Branch type volume" tab  
23 please and you can see there's an analysis of  
24 transaction corrections by branch type, yes?  
25 A. Yes.

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1 Q. And then if we go to the "Summary by period" tab please.  
 2 You can see there -- if we just take DVLA as an example,  
 3 where your evidence of the present number of TCs is  
 4 there is about a handful, if you go up to the top to see  
 5 the headings there, can you see "2010/2011 outturn",  
 6 that's an annual figure, that's 2,717, do you see that?  
 7 A. I do.  
 8 Q. So that's not very recognisable from what you have said  
 9 in your witness statement. Is that because that's gone  
 10 down radically?  
 11 A. It will have gone down radically, yes. I don't believe  
 12 we actually transact that type of transaction with the  
 13 DVLA any more. The transactions that we're dealing with  
 14 where there are very few is we now have a corporate  
 15 relationship with the DVLA where we have fleet companies  
 16 such as Arval or Hitachi Finance who tax their cars with  
 17 us on a bulk basis and they pay us a significant amount  
 18 of money maybe two days prior to when they are actually  
 19 going to tax their cars and we request that the  
 20 branches -- or we task the branches in calling us before  
 21 they do these transactions to make sure that the funds  
 22 are available to actually pay for these transactions.  
 23 Q. Okay. Mr Smith, looking at the figures for DVLA in  
 24 those earlier years that we have seen, it doesn't  
 25 surprise you that they are of that order?

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1 A. I don't have enough knowledge to know whether they are  
 2 right or wrong I'm afraid.  
 3 Q. So you wouldn't have been able to assess very well what  
 4 the other people you were getting information from were  
 5 telling you?  
 6 A. No, I wouldn't.  
 7 Q. I'm grateful.  
 8 My Lord, I have no further questions.  
 9 MR JUSTICE FRASER: Mr De Garr Robinson?  
 10 MR DE GARR ROBINSON: I have no further questions.  
 11 Questions from MR JUSTICE FRASER  
 12 MR JUSTICE FRASER: I have two.  
 13 Can we go to your statement please, which is at  
 14 {E2/9/3} and your paragraph 16 where you explain about  
 15 this case management system. Do you see the first line  
 16 of your paragraph 16?  
 17 A. Yes, my Lord.  
 18 MR JUSTICE FRASER: What is it called?  
 19 A. It is called -- you will have to excuse me, nerves. It  
 20 is dynamics, my Lord.  
 21 MR JUSTICE FRASER: Dynamics.  
 22 A. Dynamics, my Lord, yes.  
 23 MR JUSTICE FRASER: I know this is quite new because you say  
 24 it has not been fully rolled out and it only started  
 25 in September 2018, is that right?

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1 A. It did for the FSC, my Lord, yes.  
 2 MR JUSTICE FRASER: And then you also referred to reports  
 3 which you said had been generated very recently.  
 4 A. Yes, my Lord.  
 5 MR JUSTICE FRASER: Do you recall Mr Green was asking you  
 6 about those?  
 7 A. I do.  
 8 MR JUSTICE FRASER: What are they called?  
 9 A. I don't think they have a specific name, my Lord,  
 10 I think they are just reports that have been set up  
 11 within the Dynamics system to allow the team leader to  
 12 easily access, such as a dashboard to be able to see  
 13 graphically volumes and information behind that.  
 14 MR JUSTICE FRASER: Per month or -- because it has not yet  
 15 been going a whole year -- or quarterly or what?  
 16 A. I believe it gives the data daily and monthly, but I'm  
 17 going on a conversation as opposed to something I can  
 18 give you concretely.  
 19 MR JUSTICE FRASER: That's all right. It certainly can't be  
 20 annually, can it?  
 21 A. No, absolutely not. It could be set up to be annually,  
 22 but it wouldn't give you -- it would just give you up to  
 23 now, yes.  
 24 MR JUSTICE FRASER: At the moment it won't be an annual one.  
 25 A. Yes.

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1 MR JUSTICE FRASER: That's very useful.  
 2 Then the second question, if we can go forward  
 3 please to {E2/9/6}, which will be your paragraph 27. Do  
 4 you see that?  
 5 A. Yes, my Lord.  
 6 MR JUSTICE FRASER: Now, the only reason I'm going to be  
 7 a bit precise about this is because of the slight  
 8 difficulty with headings in your tables earlier in your  
 9 statement. When you say "MoneyGram receive one or two  
 10 disputes a month", is that MoneyGram the company  
 11 receiving disputes from the Post Office, is that  
 12 MoneyGram the team receiving disputes back from branches  
 13 about TCs, or is it something else? What does it mean?  
 14 A. My Lord, I believe this is MoneyGram as the team within  
 15 the FSC.  
 16 MR JUSTICE FRASER: The MoneyGram team.  
 17 A. Yes, my Lord.  
 18 MR JUSTICE FRASER: Receiving one or two disputes a month  
 19 from ..?  
 20 A. Branches.  
 21 MR JUSTICE FRASER: From the branches. And is your  
 22 understanding that they are disputes in respect of  
 23 transaction corrections issued by the team, or in  
 24 respect of something else?  
 25 A. My assumption based on what I put in paragraph 16, which

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1 is that this is the information that I have gained from  
 2 team leaders, it would be disputes regarding transaction  
 3 corrections that have been received by branch.  
 4 MR JUSTICE FRASER: But your paragraph 16 is talking about  
 5 the sense of proportion of TCs that have been challenged  
 6 and what challenges were successful.  
 7 A. I'm specifically --  
 8 MR JUSTICE FRASER: So the one or two disputes a month are  
 9 back in respect of TCs that have been issued, is that  
 10 right?  
 11 A. That is my assumption, yes, my Lord.  
 12 MR JUSTICE FRASER: And that would be as a proportion of  
 13 what higher number, or any idea, or you can't remember,  
 14 or you were never told?  
 15 A. I'm unaware of the number, my Lord.  
 16 MR JUSTICE FRASER: Unaware. All right, that's very  
 17 helpful, thank you.  
 18 Mr De Garr Robinson, anything? No.  
 19 MR DE GARR ROBINSON: My Lord, no questions.  
 20 MR JUSTICE FRASER: Mr Smith, that's your evidence done so  
 21 thank you very much. You don't have to come back  
 22 tomorrow. Obviously you are welcome to but you don't  
 23 have to come back to give evidence. Thank you very  
 24 much.  
 25 Anything that needs dealing with?

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1 Can I just raise a polite reminder about experts'  
 2 reports cross-referenced to the Opus -- when I mentioned  
 3 it last week it wasn't urgent. It is still not urgent  
 4 but I would broadly like them by the end of the week if  
 5 possible.  
 6 And then I was also going to have a file of PEAKs  
 7 and KELs.  
 8 MR GREEN: My Lord, do you want us to give it to you as we  
 9 go along?  
 10 MR JUSTICE FRASER: I think so, yes please.  
 11 MR DE GARR ROBINSON: It would be helpful if all parties  
 12 could have the same file.  
 13 MR JUSTICE FRASER: I agree, but I don't suppose the  
 14 claimants necessarily know which ones you are going to  
 15 use when you are cross-examining Mr Coyne.  
 16 MR DE GARR ROBINSON: No, no, absolutely.  
 17 MR JUSTICE FRASER: I would have thought the task of  
 18 providing one by the end of the week for the evidence of  
 19 fact is probably going to be fairly straightforward,  
 20 because we haven't been using very many.  
 21 MR GREEN: My Lord, yes.  
 22 MR JUSTICE FRASER: And then after that it can be updated  
 23 every couple of days. And it doesn't have to be updated  
 24 before they are asked questions, it can be updated  
 25 afterwards. It's just to give me a useful working file.

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1 Right, anything else?  
 2 MR DE GARR ROBINSON: My Lord, no.  
 3 MR JUSTICE FRASER: No. 10.30 tomorrow. Thank you very  
 4 much.  
 5 (4.36 pm)  
 6 (The court adjourned until 10.30 am on Wednesday,  
 7 20 March 2019)

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