## The Post Office Horizon IT Inquiry

| 1   | Tuesday, 28 February 2023  | 1   |                      | a   |
|---|--|---|----------------------|---|
| •   | 10.00 am)  | 2   |                      | C   |
|   | IR BLAKE: Good morning, sir.<br>SIR WYN WILLIAMS: Good morning.  | 3<br>4  |                      |   |
|   | <b>IR BLAKE:</b> Sir, before we begin with today's witness   | 4<br>5  |                      | N   |
| 6 N   | I'd just like to say that yesterday the Inquiry  | 6   |                      | s<br>is   |
| 7   | received over 700 documents from Post Office   | 7   |                      | 13  |
| 8   | Limited that are potentially relevant to issues  | 8   |                      | w   |
| 9   | to be explored in Phase 3. This disclosure   | 9   |                      | d   |
| 10  | includes documents said to be provided to  | 10  | SIR                  |   |
| 11  | members of NBSC to assist in dealing with calls  | 10  | Silv                 |   |
| 12  | for assistance from subpostmasters.  | 12  |                      | p<br>o  |
| 13  | The Inquiry considers that the vast majority   | 12  |                      | e   |
| 14  | of these documents should have been provided   | 13  |                      | r   |
| 5   | further to a Rule 9 Request sent on 18 February  | 14  |                      |   |
| 6   | 2022.  | 16  |                      | p<br>it   |
| 17  | We have considered carefully whether to seek   | 10  |                      | a   |
| 8   | to postpone hearing some of the witnesses this   | 17  |                      | a<br>v  |
| 9   | week until such time as those documents have   | 10  |                      | e   |
| 20  | been fully reviewed and disclosed to Core  | 20  |                      | y   |
| 21  | Participants. However, we propose not to do so.  | 20  |                      | y<br>W  |
| 22  | This is because the witness can speak to   | 21  | MR                   |   |
| 23  | a number of other issues and those issues should   | 23  | MIX                  | tl  |
| 24  | be investigated now. Your legal team will  | 23  |                      |   |
| 25  | continue to review the newly disclosed documents   | 25  |                      |   |
|   | 1  |   |                      |   |
|   |  | 1   |                      | a<br>ti   |
| 1 N<br>2  | 1<br><b>IR BLAKE:</b> Thank you. Can you give your full name,<br>please.<br><b>A.</b> Yeah, Shaun Turner.  | 1   |                      |   |
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| 1 N<br>2 A<br>5 A<br>7 C<br>8 9<br>10 A<br>14 C<br>13 A<br>14 C<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22   | <ul> <li>AR BLAKE: Thank you. Can you give your full name, please.</li> <li>Yeah, Shaun Turner.</li> <li>Mr Turner, you should have in front of you a witness statement dated 13 January 2023.</li> <li>I do.</li> <li>It has the URN WITN04640100. If I can ask you to turn to page 91 of that statement, is that your signature there?</li> <li>It is.</li> <li>Thank you. Can you confirm that statement is true to the best of your knowledge and belief?</li> <li>It is.</li> <li>Thank you. I know that there are couple of areas that you'd like to expand upon or clarify in due course. We don't need to address those now, we can address them shortly. That statement is going into evidence, so I'm not going to ask you about every single detail contained in that witness statement. The questions I'll ask today will be supplementary, although I am going to start by asking you a bit</li> </ul>  | 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Q.<br>A.<br>Q.       | ti<br>on<br>CbeAttTbnCYV<br>irititro<br>Y   |
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| 1  |                | and provide them, where they are relevant, to  |
|--|----------------|--|
| 2  |                | Core Participants in due course.   |
| 3  |                | We propose keeping under consideration   |
| 4  |                | whether it's necessary to arrange additional   |
| 5  |                | sitting days to hear oral evidence on those  |
| 6  |                | issues raised in that disclosure.  |
| 7  |                | The Inquiry can, of course, recall any   |
| 8  |                | witnesses heard this week to speak to those  |
| 9  |                | documents should it become necessary.  |
| 0  | SIR            | WYN WILLIAMS: Thank you, Mr Blake. I think you   |
| 1  |                | probably know that I was informed of this state  |
| 12   |                | of affairs, to be precise, at about 7.05 last  |
| 13   |                | evening, so I have had the opportunity to  |
| 14   |                | reflect upon the course of action which you  |
| 15   |                | propose overnight and, in short, I agree with  |
| 16   |                | it. I don't think anything would be served by  |
| 17   |                | adjourning for a short period and asking   |
| 18   |                |  |
|  |                | witnesses who made themselves ready to give<br>evidence not to do so. I think the course that  |
| 19   |                |  |
| 20   |                | you suggest is preferable, and so that's what  |
| 21<br>22   | мр             | we'll do.  |
|  | IVIT           | BLAKE: Thank you very much, sir. In light of   |
| 23   |                | that, may I please call Mr Shaun Turner.   |
| 24   |                | SHAUN TURNER (affirmed)  |
| 25   |                | Questioned by MR BLAKE   |
|  |                |  |
|  |                | _  |
|  |                | _  |
| 1  |                | and a lot of those positions have quite long   |
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A. Yes.

5 **Q.** 1999 you became an NBSC analyst.

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17 **Q**.

instance?

| 1  | A.                         | Mm-hm.   |
|--|----------------------------|--|
| 2  | Q.                         | You're the first witness from the NBSC, so can   |
| 3  | ·                          | you please tell us what was the NBSC?  |
| 4  | Α.                         | The NBSC was the Network Business Support Centre   |
| 5  |                            | it was set up in line with the Horizon rollout.  |
| 6  |                            | So the idea was, as branches migrated onto   |
| 7  |                            | Horizon, they would stop contacting their  |
| 8  |                            | regional helpline and start contacting the NBSC  |
| 9  |                            | and the NBSC would then become the helpline for  |
| 10   |                            | Horizon branches, fulfilling the same function   |
| 11   |                            | as the regional helplines did.   |
| 12   | Q.                         | I think we've heard in previous evidence about   |
| 13   |                            | first line of support, second line of support.   |
| 14   |                            | Can you tell us briefly where you fit into the   |
| 15   |                            | mix of different levels of support?  |
| 16   | Α.                         | Yes. I was aligned with the second line of   |
| 17   |                            | support which was called tier 2, which was   |
| 18   |                            | operated by Post Office, so that was the   |
| 19   |                            | advisers that dealt with the more complicated  |
| 20   |                            | enquiries. The first tier was actually not   |
| 21   |                            | managed by Post Office; it was managed by  |
| 22   |                            | another part of Royal Mail Group called SSL and  |
| 23   |                            | they had their own sort of management structure,   |
| 24   |                            | team leaders and they dealt with the sort of   |
| 25   |                            | more basic enquiries, anything that was more 5   |
|  |                            | 6  |
|  |                            |  |
| 1  | Q.                         | Were there policies in place that clearly  |
| 1<br>2   | Q.                         | Were there policies in place that clearly defined the roles of the NBSC and the Horizon  |
| 1<br>2<br>3  | Q.                         | Were there policies in place that clearly<br>defined the roles of the NBSC and the Horizon<br>Service Desk, vis à vis one another?   |
| 2  | Q.<br>A.                   | defined the roles of the NBSC and the Horizon  |
| 2<br>3   |                            | defined the roles of the NBSC and the Horizon<br>Service Desk, vis à vis one another?  |
| 2<br>3<br>4  |                            | defined the roles of the NBSC and the Horizon<br>Service Desk, vis à vis one another?<br>I don't remember any policy documents as such.  |
| 2<br>3<br>4<br>5   |                            | defined the roles of the NBSC and the Horizon<br>Service Desk, vis à vis one another?<br>I don't remember any policy documents as such.<br>I remember communications and, in the materials   |
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| 2<br>3<br>4<br>5<br>6<br>7   |                            | defined the roles of the NBSC and the Horizon<br>Service Desk, vis à vis one another?<br>I don't remember any policy documents as such.<br>I remember communications and, in the materials<br>that went out to branches, that that was made<br>clear. And I think from a contractual   |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | A.<br>Q.<br>A.<br>Q.<br>A. | defined the roles of the NBSC and the Horizon<br>Service Desk, vis à vis one another?<br>I don't remember any policy documents as such.<br>I remember communications and, in the materials<br>that went out to branches, that that was made<br>clear. And I think from a contractual<br>perspective, from what I understood, it was<br>quite clear from a contractual perspective what<br>the sort of delineation of those two helpdesks'<br>scope and responsibility was.<br>Let's say if I had a bug with my Horizon<br>terminal, who would I call?<br>If you thought that there was a problem with the<br>system then you would call HSD.<br>If I had a problem balancing but I didn't know<br>what was causing it, who would I call?<br>NBSC in the first instance.<br>You said there was some confusion between the<br>two by postmasters. Can you describe that<br>a little bit for us?<br>Yeah, I think it was just general this was  |

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it clear that if it is a system problem, then you ring this helpdesk; if it is a navigation or operational kind of enquiry, then you ring the NBSC. That wasn't always followed. We did get a lot of branches ringing the wrong helpdesk and that resulted in, at times, transfers between the helpdesks where we had to reroute callers. 6 just rang the wrong helpdesk and needed to be rerouted. But there were other kind of queries that may involve or may require the interaction with both helpdesks. So, for example, if you were trying to produce your trading statement, your cash account, and your printer broke, you would need to report that to the HSD but you may also need to report to the NBSC that your cash account would be delayed, for example. Q. Was there ever a single point of contact or would you, the subpostmaster, have to make contact with both? 14 **A**. We would generally, the helpdesk that dealt with the call first would deal with their bit of the call and then transfer the call across to the other helpdesk to deal with the final bit. Q. Again, in relation to policies that existed, was

complicated or required, so a longer diagnosis

I wanted to speak to somebody about a problem

would be passed to the tier 2 team.

Q. If I were a subpostmaster or an assistant and

with Horizon, who would I call in the first

A. It depends what the problem was. If it was sort

of operational procedures or navigation, it

that would be the tier 1 NBSC and, if they

couldn't deal with it, it went on to tier 2. If

it was system-related issues, your printer

HSD, which was managed by Fujitsu.

15 Q. Is that the Horizon Service Desk?

wasn't working, something like that, it would be

Thank you. How would I know which to call?

There were communications to branches that made

would be the NBSC and, in the first instance,

19 there something that set that out, that the 20 first helpline would be the one that dealt with

the problem or took leadership or ownership of 21 22 it?

23 Α. Not to my recollection.

24 Q. Can you tell us at 1999 what was your role at 25 the NBSC?

| 1        | Α.       | So in 1999 I was in late 1999, I became  |
|----------|----------|--|
| 2        |          | an NBSC incident analyst. So that was a role   |
| 3        |          | one of two roles that were attached to tier 2 in   |
| 4        |          | the NBSC and we had accountability for building  |
| 5        |          | reports to monitor calls coming in to the  |
| 6        |          | helpdesk and we had a link to the Problem  |
| 7        |          | Management Team, if there were issues that we  |
| 8        |          | saw kind of repeating.   |
| 9        | Q.       | Would you speak directly with branches in that   |
| 10       |          | role?  |
| 11       | Α.       | Not typically, no. I'm not saying that that  |
| 12       |          | never happened but, typically, it would be the   |
| 13       |          | advisers or sometimes the team leaders and they  |
| 14       |          | would sometimes bring issues to us, but not  |
| 15       |          | typically during the course of my role as an   |
| 16       |          | incident analyst, no.  |
| 17       | Q.       |  |
| 18       |          | and things like that?  |
| 19       | Α.       | Yeah, I mean, it did perform a sort of ancillary   |
| 20       |          | support function for the advisers because their  |
| 21       |          | team leader may not always be about. So, you   |
| 22       |          | know, any manager could be approached with   |
| 23       |          | queries from advisers. So I'm not saying that  |
| 24       |          | there was no interaction with postmasters but  |
| 25       |          | I was saying it would be rare, compared to<br>9  |
|          |          | 3  |
|          |          |  |
| 1        |          | a separate team that made those outbound calls,  |
| 2        |          | which was from Chesterfield but, when I moved  |
| 3        |          | into the network conformance capacity manager  |
| 4        |          | role, that work was moved back to the NBSC. It   |
| 5        |          | was actually undertaken by the tier 2 advisers,  |
| 6        |          | one of the teams. It was kind of rota'd round  |
| 7        |          | the teams each week.   |
| 8        |          | And also that role, we did sort of capacity  |
| 9<br>10  |          | planning, so we were sort of analysing call  |
| 10<br>11 |          | arrival patterns and trying to make sure we had the relevant cover on tier 2, at the helpdesk, |
| 12       |          | to meet the call volumes.  |
| 12       | Q.       |  |
| 14       | ω.       | adviser. Again, very briefly, can you tell us  |
| 14       |          | what that role involved?   |
| 16       | Α.       | Yeah, so this was a it was initially   |
| 17       | <u>.</u> | a project role when I first moved into it.   |
| 18       |          | There was some reorganisation at that time in  |
| 19       |          | the retail structure, and what they were trying  |
| 20       |          | to do at that stage was traditionally, post  |
| 20       |          | offices had a retail network manager that was  |
| 22       |          | connected to each branch and this piece of work  |
| 22       |          | was to have a much more kind of distinct   |

- 24 separation between sales and service. So the
  - sort of on the ground resources would be focused
    - 11

| 1  |    | a team leader's, who would have day-to-day       |
|----|----|--|
| 2  |    | interactions with postmasters.                   |
| 3  | Q. | September 2001, you became network performance   |
| 4  |    | analyst. What, in simple terms, did that role    |
| 5  |    | involve?   |
| 6  | Α. | So this was a I moved out of the NBSC at this    |
| 7  |    | point. This was a role, again principally        |
| 8  |    | a role related to data and analysis and this was |
| 9  |    | looking at sort of conformance related data. So  |
| 10 |    | this may be errors that the branch was making,   |
| 11 |    | and trying to build call campaigns, outbound     |
| 12 |    | call campaigns, to speak to branches about those |
| 13 |    | errors and ultimately reduce them.               |
| 14 | Q. | You moved on to a banking project before         |
| 15 |    | becoming network conformance and capacity        |
| 16 |    | manager in 2003.                                 |
| 17 | Α. | Yes.   |
| 18 | Q. | I think in that role you looked again at error   |
| 19 |    | rates in conformance within branches to          |
| 20 |    | prioritise calls; is that right?                 |
| 21 | Α. | That's right, yeah.                              |
| 22 | Q. | Can you tell us briefly what that involved?      |
| 23 | Α. | That was essentially a rerun of the earlier      |
| 24 |    | role. It was just moved into the NBSC. So        |
| 25 |    | there was a separate team in 2001 there was      |
|    |    | 10   |
|    |    |  |
| 1  |    | on the top sales branches and the service        |
| 2  |    | related issues, things like ordering date        |
| 3  |    | stamps, that kind of thing, that had             |
| 4  |    | traditionally gone to the retail network manager |
| 5  |    | were kind of rerouted centrally through the      |
| 6  |    | NBSC, and if they couldn't resolve it, it would  |
| 7  |    | go on to the service teams who would fulfil      |
| 8  |    | a kind of reactive capability of going out to    |
| 9  |    | branches to resolve issues.                      |
| 10 |    | So it started off with that piece of             |
| 11 |    | transformation work, building the processes,     |
| 12 |    | developing the processes with NBSC, and then it  |
| 13 |    | morphed into a team that was essentially         |
| 14 |    | attached to that service function and was        |
| 15 |    | responsible for managing relationships with      |
| 16 |    | other business stakeholders.                     |
|    |    |  |

- So, for example, Product and Branch 18 Accounting in Chesterfield, the Problem Management Team. We would get sort of issues
- 19 20 raised to us from the service managers and we
- 21 would take those up with our contacts in those 22 various teams.
- 23 Q. After that role, you moved to several different
- 24 roles. Is it right to say that they were

17

25 predominantly data-related roles, analysing

| 1  |                      | data; is that your particular area of expertise?   |
|--|----------------------|--|
| 2  | Α.                   | Yeah, I think that's a fair categorisation of  |
| 3  |                      | the roles that I held from sort of 2010 to late  |
| 4  |                      | 2015. They were data-related roles and they  |
| 5  |                      | were predominantly concerned with conformance  |
| 6  |                      | and compliance specifically.   |
| 7  | Q.                   | That involves drawing trends together from   |
| 8  |                      | various pieces of data to see how Post Office  |
| 9  |                      | can perform better?  |
| 10   | Α.                   | Yeah, and this is mainly to do with or at the  |
| 11   |                      | time it was mainly to do with sort of mails  |
| 12   |                      | compliance specifically. In 2012, we signed the  |
| 13   |                      | Mails Distribution Agreement with Royal Mail,  |
| 14   |                      | and that had certain sort of SLAs that the Post  |
| 15   |                      | Office were expected to hit and things like  |
| 16   |                      | segregating your mail correctly in a branch. So  |
| 17   |                      | it was mainly related to that sort of data, and  |
| 18   |                      | sort of targeting outbound call interventions to   |
| 19   |                      | branches to kind of coach them to improve  |
| 20   |                      | performance.   |
| 21   | Q.                   | I think you're still at the Post Office?   |
| 22   | Α.                   | Correct, yeah.   |
| 23   | Q.                   | What level within the company have you reached?  |
| 24   | Α.                   | I guess, sort of well, lower senior manager,   |
| 25   |                      | I guess, in more recent years.   |
|  |                      | 13   |
|  |                      |  |
|  |                      |  |
| 1  |                      | the desk, you know, we were getting a lot of   |
| 1<br>2   |                      | the desk, you know, we were getting a lot of calls on balancing, not just discrepancies but  |
|  |                      |  |
| 2  |                      | calls on balancing, not just discrepancies but   |
| 2<br>3   |                      | calls on balancing, not just discrepancies but just the process itself, how to work through it.  |
| 2<br>3<br>4  | Q.                   | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was   |
| 2<br>3<br>4<br>5   | Q.                   | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.  |
| 2<br>3<br>4<br>5<br>6  | Q.<br>A.             | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was   |
| 2<br>3<br>4<br>5<br>6<br>7   |                      | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | Α.                   | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | A.<br>Q.             | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | A.<br>Q.<br>A.       | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10   | A.<br>Q.<br>A.       | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.<br>As things progressed throughout the life of  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   | A.<br>Q.<br>A.       | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.<br>As things progressed throughout the life of<br>Horizon, have you ever thought "From what I'm   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13   | A.<br>Q.<br>A.<br>Q. | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.<br>As things progressed throughout the life of<br>Horizon, have you ever thought "From what I'm<br>seeing, there's a problem here"?   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14   | A.<br>Q.<br>A.<br>Q. | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.<br>As things progressed throughout the life of<br>Horizon, have you ever thought "From what I'm<br>seeing, there's a problem here"?<br>I think, as I kind of moved into the sort of   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   | A.<br>Q.<br>A.<br>Q. | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.<br>As things progressed throughout the life of<br>Horizon, have you ever thought "From what I'm<br>seeing, there's a problem here"?<br>I think, as I kind of moved into the sort of<br>service area in 2005, and perhaps in that  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16   | A.<br>Q.<br>A.<br>Q. | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.<br>As things progressed throughout the life of<br>Horizon, have you ever thought "From what I'm<br>seeing, there's a problem here"?<br>I think, as I kind of moved into the sort of<br>service area in 2005, and perhaps in that<br>intervening period, my thinking did evolve. It  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | A.<br>Q.<br>A.<br>Q. | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.<br>As things progressed throughout the life of<br>Horizon, have you ever thought "From what I'm<br>seeing, there's a problem here"?<br>I think, as I kind of moved into the sort of<br>service area in 2005, and perhaps in that<br>intervening period, my thinking did evolve. It<br>wasn't at that stage that I thought that the  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | A.<br>Q.<br>A.<br>Q. | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.<br>As things progressed throughout the life of<br>Horizon, have you ever thought "From what I'm<br>seeing, there's a problem here"?<br>I think, as I kind of moved into the sort of<br>service area in 2005, and perhaps in that<br>intervening period, my thinking did evolve. It<br>wasn't at that stage that I thought that the<br>Horizon System was infallible but what I did  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | A.<br>Q.<br>A.<br>Q. | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.<br>As things progressed throughout the life of<br>Horizon, have you ever thought "From what I'm<br>seeing, there's a problem here"?<br>I think, as I kind of moved into the sort of<br>service area in 2005, and perhaps in that<br>intervening period, my thinking did evolve. It<br>wasn't at that stage that I thought that the<br>Horizon System was infallible but what I did<br>think was that bugs were monitored, if there  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | A.<br>Q.<br>A.<br>Q. | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.<br>As things progressed throughout the life of<br>Horizon, have you ever thought "From what I'm<br>seeing, there's a problem here"?<br>I think, as I kind of moved into the sort of<br>service area in 2005, and perhaps in that<br>intervening period, my thinking did evolve. It<br>wasn't at that stage that I thought that the<br>Horizon System was infallible but what I did<br>think was that bugs were monitored, if there<br>were issues with the Horizon System, and could  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | A.<br>Q.<br>A.<br>Q. | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.<br>As things progressed throughout the life of<br>Horizon, have you ever thought "From what I'm<br>seeing, there's a problem here"?<br>I think, as I kind of moved into the sort of<br>service area in 2005, and perhaps in that<br>intervening period, my thinking did evolve. It<br>wasn't at that stage that I thought that the<br>Horizon System was infallible but what I did<br>think was that bugs were monitored, if there<br>were issues with the Horizon System, and could<br>be identified relatively easily by Fujitsu and  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | A.<br>Q.<br>A.<br>Q. | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.<br>As things progressed throughout the life of<br>Horizon, have you ever thought "From what I'm<br>seeing, there's a problem here"?<br>I think, as I kind of moved into the sort of<br>service area in 2005, and perhaps in that<br>intervening period, my thinking did evolve. It<br>wasn't at that stage that I thought that the<br>Horizon System was infallible but what I did<br>think was that bugs were monitored, if there<br>were issues with the Horizon System, and could<br>be identified relatively easily by Fujitsu and<br>HSD; if you referred a branch to them, it should                      |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | A.<br>Q.<br>A.<br>Q. | calls on balancing, not just discrepancies but<br>just the process itself, how to work through it.<br>But I didn't, at that time, think that there was<br>any kind of particular issues with Horizon.<br>When you say "at that time", which time was<br>that?<br>When I was an incident analyst in 1999 and 2000.<br>So the early days of Horizon?<br>Yes.<br>As things progressed throughout the life of<br>Horizon, have you ever thought "From what I'm<br>seeing, there's a problem here"?<br>I think, as I kind of moved into the sort of<br>service area in 2005, and perhaps in that<br>intervening period, my thinking did evolve. It<br>wasn't at that stage that I thought that the<br>Horizon System was infallible but what I did<br>think was that bugs were monitored, if there<br>were issues with the Horizon System, and could<br>be identified relatively easily by Fujitsu and<br>HSD; if you referred a branch to them, it should<br>be clear to them. |

| 2  |                      | along those lines?   |  |  |  |
|--|----------------------|--|--|--|--|
| 3  | Α.                   | No, that would be several rungs above me.  |  |  |  |
| 4  | Q.                   | So in all of your roles, so some were speaking   |  |  |  |
| 5  |                      | directly with branches on occasion or others in  |  |  |  |
| 6  |                      | analyst roles, did you look at common problems   |  |  |  |
| 7  |                      | that were cropping up and think that there was   |  |  |  |
| 8  |                      | a problem with Horizon?  |  |  |  |
| 9  | Α.                   | When I was with the NBSC there was certainly   |  |  |  |
| 10   |                      | problems that were being faced by branches which   |  |  |  |
| 11   |                      | were coming through in the trend analysis and we   |  |  |  |
| 12   |                      | raised some of those to Problem Management in  |  |  |  |
| 13   |                      | due course. I can recall, for example, raising   |  |  |  |
| 14   |                      | problems on checklistings, which was an area of  |  |  |  |
| 14   |                      | confusion for branches. I can recall raising   |  |  |  |
|  |                      |  |  |  |  |
| 16   |                      | problems on the declaration process, so that was   |  |  |  |
| 17   |                      | rather clunky and could cause confusion, and   |  |  |  |
| 18   |                      | I recall raising problems on obsolete stock  |  |  |  |
| 19   |                      | process as well, so various things that would  |  |  |  |
| 20   | _                    | cause calls to come in to NBSC.  |  |  |  |
| 21   | Q.                   | When we talk about bugs, errors and defects in   |  |  |  |
| 22   |                      | Horizon, were there any trends that you thought,   |  |  |  |
| 23   |                      | "Hang on a minute, there's a problem here"?  |  |  |  |
| 24   | Α.                   | No, I don't think there was obviously issues   |  |  |  |
| 25   |                      | in branches with balancing. That was evident on  |  |  |  |
|  |                      | 4.4  |  |  |  |
|  |                      | 14   |  |  |  |
|  |                      | 14   |  |  |  |
| 1  |                      |  |  |  |  |
| 1  |                      | in place and bugs would be quite easily  |  |  |  |
| 2  |                      | in place and bugs would be quite easily identifiable.  |  |  |  |
| 2<br>3   | Q.                   | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm   |  |  |  |
| 2<br>3<br>4  | Q.                   | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's   |  |  |  |
| 2<br>3<br>4<br>5   | Q.                   | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness   |  |  |  |
| 2<br>3<br>4<br>5<br>6  |                      | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.   |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7   | А.                   | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.   |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  |                      | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you   |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | А.                   | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to  |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | А.                   | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to<br>Horizon?  |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11   | А.                   | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to<br>Horizon?<br>I don't recall exactly. There was some  |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | A.<br>Q.             | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to<br>Horizon?<br>I don't recall exactly. There was some<br>training. I think either a week or two weeks of   |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11   | A.<br>Q.             | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to<br>Horizon?<br>I don't recall exactly. There was some  |  |  |  |
| 2<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12  | A.<br>Q.             | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to<br>Horizon?<br>I don't recall exactly. There was some<br>training. I think either a week or two weeks of   |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13   | A.<br>Q.             | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to<br>Horizon?<br>I don't recall exactly. There was some<br>training. I think either a week or two weeks of<br>training but I don't recall precisely what   |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                     | A.<br>Q.<br>A.       | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to<br>Horizon?<br>I don't recall exactly. There was some<br>training. I think either a week or two weeks of<br>training but I don't recall precisely what<br>I personally received.   |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                               | A.<br>Q.<br>A.       | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to<br>Horizon?<br>I don't recall exactly. There was some<br>training. I think either a week or two weeks of<br>training but I don't recall precisely what<br>I personally received.<br>Were you provided, do you think, with more or  |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                         | A.<br>Q.<br>A.       | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to<br>Horizon?<br>I don't recall exactly. There was some<br>training. I think either a week or two weeks of<br>training but I don't recall precisely what<br>I personally received.<br>Were you provided, do you think, with more or<br>less training than subpostmasters were provided?  |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                   | A.<br>Q.<br>A.       | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to<br>Horizon?<br>I don't recall exactly. There was some<br>training. I think either a week or two weeks of<br>training but I don't recall precisely what<br>I personally received.<br>Were you provided, do you think, with more or<br>less training than subpostmasters were provided?<br>Um I think postmasters, if I recall   |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18             | A.<br>Q.<br>A.       | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to<br>Horizon?<br>I don't recall exactly. There was some<br>training. I think either a week or two weeks of<br>training but I don't recall precisely what<br>I personally received.<br>Were you provided, do you think, with more or<br>less training than subpostmasters were provided?<br>Um I think postmasters, if I recall<br>correctly, had two days or a day and a half.   |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18             | A.<br>Q.<br>A.       | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to<br>Horizon?<br>I don't recall exactly. There was some<br>training. I think either a week or two weeks of<br>training but I don't recall precisely what<br>I personally received.<br>Were you provided, do you think, with more or<br>less training than subpostmasters were provided?<br>Um I think postmasters, if I recall<br>correctly, had two days or a day and a half.<br>So, on that basis, I'd have to say that we had               |  |  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20 | A.<br>Q.<br>A.<br>Q. | in place and bugs would be quite easily<br>identifiable.<br>We'll come on to talk about bugs shortly but I'm<br>going to start with training, and that's<br>something that's addressed in your witness<br>statement.<br>Yes.<br>Can you tell us what level of training did you<br>have, when the NBSC started, in relation to<br>Horizon?<br>I don't recall exactly. There was some<br>training. I think either a week or two weeks of<br>training but I don't recall precisely what<br>I personally received.<br>Were you provided, do you think, with more or<br>less training than subpostmasters were provided?<br>Um I think postmasters, if I recall<br>correctly, had two days or a day and a half.<br>So, on that basis, I'd have to say that we had<br>more, yes. |  |  |  |

1 Q. Do you ever attend board meetings or anything

24 A. Yes.25 Q. You've described in your statement the training

than subpostmasters?

23

chain as well.

| 1  |    | of subpostmasters in what you describe, I think, |
|----|----|--|
| 2  |    | the early to mid-years of your career as having  |
| 3  |    | gaps. Can you tell us briefly about those,       |
| 4  |    | please?  |
| 5  | Α. | Yeah, I think this is just a reflection on my    |
| 6  |    | experience on the desk. I mean, we'd moved from  |
| 7  |    | a situation with the regional helplines where,   |
| 8  |    | you know, calls tended to be quite short, even   |
| 9  |    | on balancing after Wednesday afternoons when the |
| 10 |    | branches balanced. There was not really too      |
| 11 |    | much of a discernible spike in calls. But when   |
| 12 |    | we moved to NBSC and the roll out of Horizon, we |
| 13 |    | did start seeing not just more calls but longer  |
| 14 |    | calls, calls that took considerable kind of      |
| 15 |    | diagnosis to get to the bottom of it and,        |
| 16 |    | therefore, that leads me to conclude that there  |
| 17 |    | were some weaknesses with the training.          |
| 18 |    | My own personal view at that time was that       |
| 19 |    | we had underestimated the sort of step change    |
| 20 |    | that branches were going through. This was       |
| 21 |    | a considerable considerably different kind of    |
| 22 |    | automated environment that they were operating   |
| 23 |    | in when they'd been used to a paper-based system |
| 24 |    | for years. So that's my view at the time and     |
| 25 |    | those were things that were escalated up the     |
|    |    | 17   |
|    |    |  |
| 1  |    | discrepancies for a good few years.              |
| 2  | Q. | Horizon began '99, 2000, so are we talking       |
| 3  |    | a decade longer?                                 |
| 4  | Α. | I think things improved after Horizon, in terms  |
| 5  |    | of the training offer. But I still think the     |
| 6  |    | sort of diagnosis of discrepancies is, you know, |
| 7  |    | that area in particular did need improvement.    |
| 8  |    | And, as I say, we have improved things in the    |
| 9  |    | past three to four years. So, I would say, I'm   |
| 10 |    | happy with where it is now but between the roll  |
| 11 |    | out of Horizon and, say, four or five years ago, |
| 12 |    | I would have been less happy. I should make the  |
| 13 |    | point here, as well, that during after sort      |
| 14 |    | of 2005, I wasn't sort of directly connected     |
| 15 |    | with the helpdesk or the training area, so these |
| 16 |    | were just kind of my personal perceptions.       |
| 17 | Q. |  |
| 18 |    | was an additional optional classroom session of  |
| 19 |    | investigating discrepancies. Do you know when    |
| 20 |    | that came into force or was brought in?          |
| 21 | Α. | l believe 2020.                                  |
| 22 | Q. | So, again, that's one of the measures that       |
| 23 |    | vou're talking about that's improved the         |

|    | <b>—</b> . |  |
|----|------------|--|
| 23 |            | you're talking about that's improved the |

- 24 position in more recent years?
- 25 A. Yeah, because I'd moved back into the training 19

2 Q. Whose job within the Post Office would it have 3 been to plan for that kind of event? 4 A. During the implementation of Horizon? 5 Q. Yes. So the weaknesses you have identified, whose job was it within POL to make sure that 6 7 those didn't occur? A. The implementation team. 8 9 Q. Who in particular? 10 A. I think it was led by Don Grey at that time. Q. You said in the early to mid years of your 11 12 career. What period are we talking about where 13 you have identified gaps in the training of 14 subpostmasters? 15 A. I think it was clear to me that there were gaps 16 during the roll out of Horizon. But I don't 17 think we've got everything right since then. 18 That's not what I'm claiming. I think there 19 were still gaps and we've made improvements even 20 in more recent years in the last three or four 21 years, in areas that I believe improve the sort 22 of training offer to postmasters. 23 So I think there's been gaps around the sort 24 of -- particularly around balancing the 25 diagnosis of discrepancies and rectification of

## 18

| 1  |    | area since 2020, so I'm kind of more familiar    |
|----|----|--|
| 2  |    | now with some of the improvements of the last    |
| 3  |    | two years. There may have been improvements in   |
| 4  |    | the intervening period but, as I say, my         |
| 5  |    | perception has been, given that we still had to  |
| 6  |    | produce or implement that investigating          |
| 7  |    | discrepancies course in 2020, that there were    |
| 8  |    | still gaps and still things that needed to be    |
| 9  |    | improved on.                                     |
| 10 | Q. | One thing you've said in your statement is that  |
| 11 |    | there's still less classroom training nowadays.  |
| 12 |    | Can you expand on that briefly?                  |
| 13 | Α. | Yeah, so when I joined the Post Office I think   |
| 14 |    | I'd three to four weeks' training in classroom.  |
| 15 |    | That was alongside postmasters and people going  |
| 16 |    | to work in Crown branches, and that has been     |
| 17 |    | scaled back over the years. Now, some of that    |
| 18 |    | has been replaced with digital learning. So      |
| 19 |    | there is a chunk of digital learning that you do |
| 20 |    | nowadays before you go to the classroom and      |
| 21 |    | there is the additional sort of investigating    |
| 22 |    | discrepancies course that we have, as well, and  |
| 23 |    | on site, as well. Six days on site.              |
| 24 |    | But, yeah, I think there's no doubt that it      |
| 25 |    | has been, you know, scaled back over the years.  |

| 1        | Q. | Is that for cost reasons or for some other                                   | 1       |
|----------|----|--|---------|
| 2        |    | reason?  | 2       |
| 3        | Α. | I think it's the digital offer has obviously                                 | 3       |
| 4        |    | replaced the need to be in classroom for some of                             | 4       |
| 5        |    | that, as to what the sort of rationale behind it                             | 5       |
| 6        |    | was, I wasn't connected to those decisions so                                | 6       |
| 7        |    | I couldn't really say whether cost was a factor                              | 7       |
| 8<br>9   | •  | or there were other rationale.   | 8<br>9  |
| 9<br>10  | Q. | You raise it in your statement, have you raised                              | 9<br>10 |
| 10       | Α. | it elsewhere within the company?<br>Not I mean, I only came back into I came | 10      |
| 12       | А. | into the training area in 2020. So it wasn't in                              | 11      |
| 13       |    | my sphere, as it were, in the sort of previous                               | 12      |
| 14       |    | years.   | 13      |
| 15       | Q. | Can we look at POL00035756, please. This is                                  | 15      |
| 16       | ٩. | a document you mention elsewhere in your witness                             | 16      |
| 17       |    | statement under a different topic but I just                                 | 10      |
| 18       |    | want to talk about this in relation to training                              | 18      |
| 19       |    | at the moment. It's a document that has the                                  | 19      |
| 20       |    | words "Compliance Training" on the left-hand                                 | 20      |
| 21       |    | side.  | 21      |
| 22       | Α. | Mm-hm.   | 22      |
| 23       | Q. | It's dated 25 March 2016. Do you know the                                    | 23      |
| 24       |    | background to this document at all?  | 24      |
| 25       | Α. | Yeah, I believe this was part of the Business                                | 25      |
|          |    | 21   |         |
|          |    |  |         |
| 1        |    | branch. Where training has taken place, records                              | 1       |
| 2        |    | have not been kept consistently."  | 2       |
| 3        |    | The "Rationale for change":  | 3       |
| 4        |    | "POL need to be able to demonstrate training                                 | 4       |
| 5        |    | across the network and maintain robust training                              | 5       |
| 6        |    | records for branches and branch staff."                                      | 6       |
| 7        |    | This is 2016. Is this a broader reflection                                   | 7       |
| 8        |    | that postmasters don't have access to enough                                 | 8       |
| 9        |    | training or is this specifically relating to                                 | 9       |
| 10       |    | compliance? It certainly seems to be broader                                 | 10      |
| 11       |    | than simply the issue of compliance.   | 11      |
| 12       | Α. | My take on this is that it is relating to                                    | 12      |
| 13       |    | compliance specifically, not least because it is                             | 13      |
| 14       |    | in a document about compliance training but                                  | 14      |
| 15       |    | I think "Consideration for Front Office" on the                              | 15      |
| 16       |    | right there does refer to compliance training.                               | 16      |
| 17       | Q. | Is it your belief that in 2016 there was or                                  | 17      |
| 18       |    | wasn't some thinking within the Post Office                                  | 18      |
| 19       |    | about the sufficiency of the training that was                               | 19      |
| 20       |    | provided, more broadly?  | 20      |
| 21       | Α. | I'm sure there was but I wasn't party to those                               | 21      |
| 22       |    | discussions around the broader considerations                                | 22      |
| 23       | ~  | around training.   | 23      |
| 24<br>25 | Q. | I'm going to move on now to the issue of advice                              | 24      |
| 25       |    | and assistance. In a couple of the roles that 23                             | 25      |
|          |    |  |         |

| 1  |    | Technology Transformation Programme, as it says   |
|--|----|---|
| 2  |    | there. So this was looking at various   |
| 3  |    | improvements to Horizon, at which compliance  |
| 4  |    | training was one.   |
| 5  | Q. | If we look at page 18 of this document, I just  |
| 6  |    | want to draw to your attention a couple of  |
| 7  |    | entries in a table, it's the top table on   |
| 8  |    | page 18. It says there "Project Sparrow   |
| 9  |    | Recommendations"; do you know what Project  |
| 10   |    | Sparrow was/is?   |
| 11   | A. | I believe that it was a project within Post   |
| 12   |    | Office looking at discrepancies and ways to   |
| 13   |    | identify them. I think, in terms of this  |
| 14   |    | particular document, it was the Project   |
| 15   |    | Sparrow was providing information, as   |
| 16   |    | I understood it, on ways that the system could  |
| 17   |    |   |
|  |    | be adapted to prevent branch mistakes or  |
| 18   | •  | discrepancies.  |
| 19   | Q. | Have you had any direct involvement with Project  |
| 20   |    | Sparrow?  |
| 21   | Α. | Other than their input into the documents as  |
| 22   |    | reviewers, no.  |
| 23   | Q. | The issue identified there is:  |
| 24   |    | "Postmasters do not have access to enough   |
| 25   |    | training to feel competent in running their   |
|  |    | 22  |
|  |    |   |
|  |    |   |
| 1  |    | you've set out for us, you were advising  |
| 1<br>2   |    | you've set out for us, you were advising branches, to some extent, and assisting them   |
|  |    |   |
| 2  |    | branches, to some extent, and assisting them  |
| 2<br>3   |    | branches, to some extent, and assisting them directly. Can you tell us what roles they were   |
| 2<br>3<br>4  | А. | branches, to some extent, and assisting them<br>directly. Can you tell us what roles they were<br>and the level of your involvement directly with   |
| 2<br>3<br>4<br>5   | А. | branches, to some extent, and assisting them<br>directly. Can you tell us what roles they were<br>and the level of your involvement directly with<br>branches?  |
| 2<br>3<br>4<br>5<br>6  | А. | branches, to some extent, and assisting them<br>directly. Can you tell us what roles they were<br>and the level of your involvement directly with<br>branches?<br>Yeah, so in the NBSC, as I've already mentioned,  |
| 2<br>3<br>4<br>5<br>6<br>7   | Α. | branches, to some extent, and assisting them<br>directly. Can you tell us what roles they were<br>and the level of your involvement directly with<br>branches?<br>Yeah, so in the NBSC, as I've already mentioned,<br>as an incident analyst you would sometimes be   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | А. | branches, to some extent, and assisting them<br>directly. Can you tell us what roles they were<br>and the level of your involvement directly with<br>branches?<br>Yeah, so in the NBSC, as I've already mentioned,<br>as an incident analyst you would sometimes be<br>called upon by a tier 2 adviser to support the   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | A. | branches, to some extent, and assisting them<br>directly. Can you tell us what roles they were<br>and the level of your involvement directly with<br>branches?<br>Yeah, so in the NBSC, as I've already mentioned,<br>as an incident analyst you would sometimes be<br>called upon by a tier 2 adviser to support the<br>call that they were dealing with, so that was in   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | A. | branches, to some extent, and assisting them<br>directly. Can you tell us what roles they were<br>and the level of your involvement directly with<br>branches?<br>Yeah, so in the NBSC, as I've already mentioned,<br>as an incident analyst you would sometimes be<br>called upon by a tier 2 adviser to support the<br>call that they were dealing with, so that was in<br>both my stints with within the NBSC, so from   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11   | A. | branches, to some extent, and assisting them<br>directly. Can you tell us what roles they were<br>and the level of your involvement directly with<br>branches?<br>Yeah, so in the NBSC, as I've already mentioned,<br>as an incident analyst you would sometimes be<br>called upon by a tier 2 adviser to support the<br>call that they were dealing with, so that was in<br>both my stints with within the NBSC, so from<br>1999 to 2001 and from 2003 to 2005 I would have  |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | A. | branches, to some extent, and assisting them<br>directly. Can you tell us what roles they were<br>and the level of your involvement directly with<br>branches?<br>Yeah, so in the NBSC, as I've already mentioned,<br>as an incident analyst you would sometimes be<br>called upon by a tier 2 adviser to support the<br>call that they were dealing with, so that was in<br>both my stints with within the NBSC, so from<br>1999 to 2001 and from 2003 to 2005 I would have<br>fulfilled that role.<br>Wider than that, in the network<br>co-ordination adviser role from 2005, I would<br>occasionally speak to branches, so this as<br>I mentioned earlier, we would deal with sort of<br>escalations from the service line where, for<br>example, transaction corrections needed chasing<br>up. So I'd deal with the branches directly with<br>that.<br>And then sort of from 2010 to 2016 when<br>I was in those data roles, that was with the<br>branch standards team, so we were making<br>outbound calls to branches about those various |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A. | branches, to some extent, and assisting them<br>directly. Can you tell us what roles they were<br>and the level of your involvement directly with<br>branches?<br>Yeah, so in the NBSC, as I've already mentioned,<br>as an incident analyst you would sometimes be<br>called upon by a tier 2 adviser to support the<br>call that they were dealing with, so that was in<br>both my stints with within the NBSC, so from<br>1999 to 2001 and from 2003 to 2005 I would have<br>fulfilled that role.<br>Wider than that, in the network<br>co-ordination adviser role from 2005, I would<br>occasionally speak to branches, so this as<br>I mentioned earlier, we would deal with sort of<br>escalations from the service line where, for<br>example, transaction corrections needed chasing<br>up. So I'd deal with the branches directly with<br>that.<br>And then sort of from 2010 to 2016 when<br>I was in those data roles, that was with the<br>branch standards team, so we were making   |

| 1        | _            | interact with branches on those as well.  |
|----------|--------------|---|
| 2        | Q.           | , , ,   |
| 3        |              | support concerning issues such as balancing, in   |
| 4        |              | the early years of Horizon?   |
| 5        | Α.           | Yeah, I think, speaking about the period when   |
| 6        |              | I was on the helpdesk on the NBSC as an incident  |
| 7        |              | analyst, I think it was a very difficult and  |
| 8        |              | challenging environment for the helpdesk. We  |
| 9        |              | were I think I mentioned this in my witness   |
| 10       |              | statement we were resourcing in line with the   |
| 11       |              | Horizon rollout and we were trying to resource  |
| 12       |              | to a central location, so that meant that,  |
| 13       |              | whereas the previous regional helplines would   |
| 14       |              | have had typically, the route into the  |
| 15       |              | previous regional helplines was through the   |
| 16       |              | Crown Network, so you kind of worked in branch  |
| 17       |              | for a number of years and then you went onto the  |
| 18       |              | regional helpline. We were recruiting and   |
| 19       |              | resourcing much more of a broad mix of  |
| 20       |              | individuals, so there was a steeper learning  |
| 21       |              | curve for some individuals, if you'd not had  |
| 22       |              | that branch experience.   |
| 23       |              | And we were obviously dealing with new  |
| 24       |              | contractual relationships with Fujitsu around   |
| 25       |              | the HSD and the scope of that helpdesk. So 25   |
|          |              |   |
|          |              |   |
| 1        |              | were in a lot of ways quite complex to follow   |
| 2        |              | for branches and the preference was to pick up  |
| 3        | ~            | the phone and speak to the helpdesk.  |
| 4        | Q.           |   |
| 5        |              | your witness statement relates to following the   |
| 6        |              | steps that are prescribed in a guide but even   |
| 7        |              | following those steps leading to an unexpected  |
| 8        |              | result; do you remember that?   |
| 9<br>10  | A.           | Yes.  |
| 10<br>11 | Q.           | Was that a common scenario?<br>Yeah, I think it is it was basically because                       |
| 12       | Α.           | when you came to a position where you were  |
| 12       |              | trying to balance and perhaps you had   |
| 13       |              | a discrepancy, a loss or a gain, it was not   |
| 14       |              | always easy then to backtrack and find out where  |
| 16       |              | that had arisen. And, as I say, the sort of   |
| 17       |              | branches at least that I spoke to then preferred  |
| 18       |              | to just get on the phone and rather than going  |
| 19       |              | through some steps, which seemed to confuse   |
| 20       |              | them, they would just get on the phone and speak  |
| 20<br>21 |              | to the helpdesk instead.  |
| 21       | Q.           | Moving on to Horizon Online and help with that,   |
| 23       | - <b>.</b> . | I think you've said that it has its own Help  |
|          |              |   |
| 24       |              | system. Can you tell us briefly about that?   |
| 24<br>25 | А.           | system. Can you tell us briefly about that?<br>Yeah. So prior to Horizon Online Help, if my       |
|          | Α.           | system. Can you tell us briefly about that?<br>Yeah. So prior to Horizon Online Help, if my<br>27 |

| •        |    | i in the set of gening on the real sing  |
|----------|----|--|
| 2        |    | journey to some extent with the branches, as   |
| 3        |    | well, you know, it was tough.  |
| 4        | Q. | You've also referred in your witness statement   |
| 5        |    | to booklets and guides and you say that they   |
| 6        |    | didn't provide branches with adequate tools, if  |
| 7        |    | they followed the steps but those steps led to   |
| 8        |    | unexpected results; do you recall that?  |
| 9        | Α. | Yeah, I mean, there was a couple of different  |
| 10       |    | communications and guides that the branches had  |
| 11       |    | access to. I think the one I particularly  |
| 12       |    | remember was the Horizon System User Guide which   |
| 13       |    | had a load of flowcharts in of various kind of   |
| 14       |    | processes that the branch was supposed to  |
| 15       |    | follow, and the feedback at least the  |
| 16       |    | branches that I spoke to about those guides  |
| 17       |    | was that they just preferred to speak to   |
| 18       |    | somebody on the helpdesk and they found them   |
| 19       |    | very difficult to navigate.  |
| 20       |    | I think the Quick Reference Guide I don't  |
| 20<br>21 |    | remember when that came in but there was a kind  |
| 21       |    |  |
| 22       |    | of abridged version that kind of gave you the<br>basic steps, particularly around balancing    |
|          |    | was much more favourably received by branches  |
| 24<br>25 |    |  |
| 25       |    | but certainly, yeah, I would say that the guides 26  |
| 1        |    | recollection is correct, there were guides in  |
| 2        |    | the branches, counter operations manuals. So   |
| 3        |    | these were physical instruction guides,  |
| 4        |    | operational guidance. Horizon Online Help sort   |
| 5        |    | of digitised those and introduced a help   |
| 6        |    | mechanism that was available from the Horizon  |
| 7        |    | counter, so you could press a button on Horizon  |
| 8        |    | if you were stuck with something, and look up  |
| 9        |    | the process.   |
| 10       | Q. | It's something called Online Help, I think, is   |
| 11       |    | that the Horizon Online Help?  |
| 12       | Α. | Yes.   |
| 13       | Q. | When was that introduced, was that from the  |
| 14       |    | beginning of Horizon Online or later?  |
| 15       | Α. | I believe it was from the beginning in 2010.   |
| 16       | Q. | You've said in your statement that, although   |
| 17       |    | that was a step forward, it hasn't evolved. Can  |
| 18       |    | you help us with that, please?   |
| 19       | Α. | Yes. So this was mainly in sort of reflecting  |
| 20       |    |  |
|          |    | upon a later project that I was involved in in   |
| 21       |    | upon a later project that I was involved in in 2016, which was to look at improvements to that |
|          |    |  |
| 21       |    | 2016, which was to look at improvements to that  |

I think it was -- we were going on the learning

- 24 that you didn't have to have people manually
- 25 updating operation guides in the branch.

| 1  |    | I don't think that's been taken forward in       |
|----|----|--|
| 2  |    | the sense of providing easy and quick access to  |
| 3  |    | Help. So the help's there, the content is there  |
| 4  |    | on Horizon but it's about the speed at which     |
| 5  |    | a postmaster or branch can access it,            |
| 6  |    | particularly if they have a customer in front of |
| 7  |    | them, and the fact that you kind of have to step |
| 8  |    | out of the transaction that you're doing to kind |
| 9  |    | of access the Help, rather than there being      |
| 10 |    | a kind of overlay of that Help that pops up in   |
| 11 |    | the corner.                                      |
| 12 | Q. | Is that still an issue?                          |
| 13 | Α. | It is at the moment, yes.                        |
| 14 | Q. | Who currently is responsible for that?           |
| 15 | Α. | I believe it is being looked at as part of the   |
| 16 |    | replacement for Horizon.                         |
| 17 | Q. | Who in particular is responsible for that?       |
| 18 | Α. | The programme that is looking at the replacement |
| 19 |    | for Horizon.                                     |
| 20 | Q. | Is there a particular individual in charge of    |
| 21 |    | that programme?                                  |
| 22 | Α. | Well, it would sit under Zdravko(?) ** in Post   |
| 23 |    | Office terms.                                    |
| 24 | Q. | Thank you. Can we look at POL00039359, please.   |
| 25 |    | It's the second page of that. It seems that in   |
|    |    | 29   |

1 the NBSC.

- 2 **Q.** Is there, within the Post Office around this
- period, a general recognition that balancing wastoo complicated and that there were issues with
- 5 balancing?

25

- A. At least in terms of my exposure to it, that was
  the kind of premise behind looking at balancing
  simplification.
- 9 Q. Was there any reflection within the Post Office
- earlier than 2017 that that was something thatshould be simplified?
- 12 A. Not in the roles that I was involved in.
- 13 Q. Do you perceive that there has been a change in
  14 attitude within the Post Office, with regards to
  15 balancing and simplifying balancing?
- 16 A. I think there has been a shift but I don't think
  17 it's sort of -- it's not led to material changes
  18 in Horizon Online at present.
- 19 **Q.** I was going to say, as a result of this email,
- have you seen any material, significant materialchanges in simplifying the balancing process?
- 22 **A.** Not the balancing process itself, not that
- 23 I recall. I think some things have been taken
- 24 forward so, for example, the ATM balancing
  - process I think has had two stages of

| 1  |    | 2017 there were efforts to simplify balancing.    |
|----|----|---|
| 2  |    | Can you tell us briefly about that, please?       |
| 3  | Α. | Yes, so   |
| 4  | Q. | It's the second page of that. Thank you.          |
| 5  | Α. | Yeah.   |
| 6  | Q. | That's an email from yourself. Who is it to and   |
| 7  |    | what's the issue there?                           |
| 8  | Α. | So there was a programme within Post Office at    |
| 9  |    | this time called STRN, which was, I think,        |
| 10 |    | Simpler To Run Network, and part of was to look   |
| 11 |    | at were there ways that we could simplify the     |
| 12 |    | balancing such that it was quicker and easier     |
| 13 |    | for postmasters.                                  |
| 14 |    | So I was involved in the sort of very early       |
| 15 |    | scoping of this programme, gathering feedback     |
| 16 |    | from stakeholders, and I think we investigated    |
| 17 |    | three areas, which were suspense account, ATM     |
| 18 |    | balancing and also the general sort of balancing  |
| 19 |    | steps. And this email is to Alison Clark, who     |
| 20 |    | worked, I think at the time, as an NBSC team      |
| 21 |    | leader, and I was trying to gather                |
| 22 |    | information we were trying to gather all the      |
| 23 |    | collateral together, essentially, all the         |
| 24 |    | documents we had on the balancing process. And    |
| 25 |    | this email was to gather that information from 30 |
|    |    |   |

| 1  |    | improvement since this document was written,    |
|----|----|---|
| 2  |    | this email was written.                         |
| 3  | Q. | If we turn to page 1 of this document and it's  |
| 4  |    | the bottom of page 1, there's also reference to |
| 5  |    | a "discrepancy diagnostics document". So it's   |
| 6  |    | the bottom of that page. Thank you. Is this     |
| 7  |    | something you're aware of?                      |
| 8  | Α. | Not to my recollection, no.                     |
| 9  | Q. | No. What was EUHSP?                             |
| 10 | Α. | That was the is that the Help I think if        |
| 11 |    | you can maybe just help me with a document.     |
| 12 | Q. | Thank you. You can look in you witness          |
| 13 |    | statement, if you like, at the beginning you've |
| 14 |    | provided, it says there "Enhanced User Help and |
| 15 |    | Support Programme"?                             |
| 16 | Α. | Okay, yeah.                                     |
| 17 | Q. | Is that something you're familiar with?         |
| 18 | Α. | Yeah, so that was part of the BTTP programme    |
| 19 |    | which was looking at enhancements to Horizon in |
| 20 |    | sort of 2016.                                   |
| 21 | Q. | Did that go ahead?                              |
| 22 | Α. | The Help specifically, the Help and Support?    |
| 23 | Q. | Yes.  |
| 24 | Α. | No, it didn't.                                  |
| 05 | ~  | 14/1  |

25 **Q.** Why not?

2

3

4

| 1        | Α.       | So part of the process for all those initiatives  |
|----------|----------|---|
| 2        |          | was to present to a senior user forum of what   |
| 3        |          | the costs and benefits of that particular change  |
| 4        |          | would be, in this case improvements to Help, and  |
| 5        |          | it didn't get through that governance forum. It   |
| 6        |          | wasn't signed off by that governance forum.   |
| 7        | Q.       | Who is in charge of that governance forum, do   |
| 8        |          | you know?   |
| 9        | Α.       | I believe at the time it was Gill Tait.   |
| 10       | Q.       | From the look of the emails that I took you to  |
| 11       |          | and reference to EUHSP, et cetera, it looks as  |
| 12       |          | though there was some thinking, in 2016, 2017,  |
| 13       |          | about how to provide more help to   |
| 14       |          | subpostmasters. Are you aware of any concrete   |
| 15       |          | significant projects that have gone ahead along   |
| 16       |          | those lines?  |
| 17       | Α.       | I don't know whether I think it was to  |
| 18       |          | provide quicker help to postmasters, not  |
| 19       |          | necessarily more. I think, as I said, the   |
| 20       |          | content is there. I think it's just about the   |
| 21<br>22 |          | way that they access it. In terms of things   |
| 22       |          | that have changed that help postmasters, there  |
| 23<br>24 |          | has been some changes in more recent times. For   |
| 24<br>25 |          | example, branch hub, which is a kind of digital<br>hub that postmasters can access, has access to |
| 20       |          | 33  |
|          |          |   |
|          |          |   |
| 1        |          | and issues that Fujitsu were aware of, in terms   |
| 2        |          | of HSD, and the Known Error Log was part of that  |
| 3        |          | information share.  |
| 4<br>5   |          | I believe it was a spreadsheet. As I've<br>said in my witness statement, I don't know             |
| 6        |          | whether that was a full set of error logs or  |
| 7        |          | whether it was a subset but I do recall seeing  |
| 8        |          | a spreadsheet when I was working on NBSC.   |
| 9        | Q.       | So this is '99 to 2001 or thereabouts?  |
| 10       | а.<br>А. | No, I'd say it was later than that. I think in  |
| 11       |          | my witness statement so it probably   |
| 12       |          | I mean, this is speculation because I don't   |
| 13       |          | remember specifically but it feels like it was  |
| 14       |          | in the later period, when I was was at  |
| 15       |          | Network? So this would have been 2003, I think.   |
| 16       |          | Around about that time.   |
| 17       | Q.       | So 2003 onwards. How long were you in that  |
| 18       |          | role? You were in that role until 2005, so 2003   |
| 19       |          | to 2005 or did it extend that, to the best of   |
| 20       |          | your recollection?  |
| 21       | Α.       | '<br>I'm not sure, given I left the role, I don't   |
| 22       |          | know. And I don't know how frequently it was  |
| 23       |          | shared.   |
| 24       | Q.       | At the end of that period, there's something  |
| 25       |          | called the Callendar Square bug and I'm going to  |
|          |          | 35  |

| 4        |    | we maintain. But, in terms of help itself, the  |
|----------|----|---|
| 5        |    | Horizon Online Help, I'm not aware of any   |
| 6        |    | significant changes to that content.  |
| 7        | Q. | I want to move on to the Known Error Log.   |
| 8        |    | You've addressed the Known Error Log in your  |
| 9        |    | witness statement.  |
| 10       | Α. | Mm-hm.  |
| 11       | Q. | I think you said that your recollection is hazy.  |
| 12       |    | Can you tell us what your recollection is of the  |
| 13       |    | sharing of a Known Error Log between Fujitsu and  |
| 14       |    | the Post Office during your involvement in those  |
| 15       |    | matters?  |
| 16       | Α. |   |
| 17       |    | I've said in the witness statement, which is  |
| 18       |    | that there was a lot of activity at that time to  |
| 19       |    | try to improve the working relationship,  |
| 20       |    | operational relationship between NBSC and HSD to  |
| 20       |    | prevent, for example, calls being bounced   |
| 21       |    | between those two helpdesks. And my   |
| 22       |    | recollection is that, as part of that, there was  |
|          |    |   |
| 24<br>25 |    | some information sharing between the two  |
| 25       |    | helpdesks of issues that the NBSC were aware of<br>34   |
| 1        |    | move on now to the Callendar Square bug. That   |
| 2        |    | first presented in October or September 2005?   |
| 3        | Α. | Yeah.   |
| 4        | Q. | Do you recall how you first found out about the   |
| 5        | α. | Callendar Square bug?   |
| 6        | Α. | From the service manager who'd been speaking to   |
| 7        | Π. | the branch.   |
| 8        | Q. |   |
| 9        | Q. | Sandra MacKay.  |
| 10       | Q. | Can we look at FUJ00083812. When you say Sandra   |
| 11       | ч. | MacKay was the service manager, what do you mean  |
| 12       |    | by "service manager"? Can you tell us a little  |
| 13       |    | bit about that role, please?  |
| 14       | Α. |   |
| 14       | А. | early sort of 2005 or thereabouts, the Retail   |
| 16       |    | Line did split, so into Sales and Service, that   |
| 17       |    | the sales managers would deal with generating   |
| 18       |    | sales and coaching on sales in the branch.  |
| 19       |    | Anything else that wasn't sales was referred to   |
| 20       |    | , .   |
| 20<br>21 |    | an area intervention office and they had various service managers who worked out of that area |
| 21       |    | intervention office and Sandra MacKay was one of  |
|          |    |   |
| 23       |    | those.  |
| 24<br>25 |    | So this was dealing with any issues that  |
| 25       |    | were not directly related to sales and they 36  |
|          |    | 50  |

resources, knowledge articles, videos and the

available on the learning management system that

like, downloadable guides, which are also

we maintain. But, in terms of Help itself, the

| 1        |          | would contact branches or they would go out and  |
|----------|----------|--|
| 2        |          | visit branches to investigate and resolve those  |
| 3        | _        | issues.  |
| 4        | Q.       |  |
| 5        |          | it all centralised?  |
| 6        | Α.       | The area intervention offices themselves were in   |
| 7        |          | designated regions but it could be any of the  |
| 8        |          | service managers that went out to a particular   |
| 9        | -        | branch for that area intervention office.  |
| 10       | Q.       | Do you remember Sandra MacKay being in charge of   |
| 11       |          | any particular region?   |
| 12       | A.       | I don't.   |
| 13       | Q.       | There's mention there of Callendar Square,   |
| 14<br>15 |          | 7 October 2005. Can you tell us what is this   |
| 15       | •        | log because we're going to see a few of them?  |
| 16<br>17 | Α.       | This is a standard log that was completed by<br>service managers for any interactions with |
|          |          | <b>o</b>   |
| 18<br>10 |          | branches. That might be a visit, it might be   |
| 19<br>20 | ^        | a call.  |
| 20<br>21 | Q.<br>A. | What would happen to those logs?<br>They would get stored against the branch record        |
| 21       | Α.       | on the electronic filing cabinet, I believe it   |
| 23       |          | was called.  |
| 24       | Q.       |  |
| 25       | ч.       | to you a little bit from that entry. It says:  |
| 20       |          | 37   |
|          |          |  |
|          |          |  |
| 1        | Α.       | At that time I was in the network co-ordination  |
| 2        |          | role. So if there were issues, not necessarily   |
| 3        |          | related just to issues with Horizon but any sort   |
| 4        |          | of issues that required the input of other   |
| 5        |          | stakeholders within the business outside of  |
| 6        |          | Service, it would be referred to myself or one   |
| (        |          | of my colleagues to kind of chase up or  |
| 8        | ~        | escalate.  |
| 9        | Q.       | Chase up or escalate with who?   |
| 10       | Α.       | In this particular case, it would typically  |
| 11       |          | be well, it depends. If we could resolve the   |
| 12<br>13 |          | issue through Fujitsu taking ownership and fixing the problem, it would be that route. If  |
| 13       |          | it was if we felt it was a wider or more   |
| 14       |          | significant problem, then we would raise it  |
| 16       |          | through to the Problem Management Team.  |
| 17       | Q.       | To who, sorry?   |
| 18       | а.<br>А. | To the Problem Management Team.  |
| 10       | Q.       | Who was in charge of the Problem Management  |
| 20       | હ.       | Team?  |
| 20<br>21 | Α.       | Not sure at this point. I think it was later   |
| 21       | Ω.       | Dave Hulbert. But I don't know at this   |
| 22       |          | particular point in time.  |
| 23<br>24 | Q.       | After your name is mentioned there, it says:   |
| 24       | ۹.       | " meanwhile the office should continue to  |
| -0       |          |  |
|          |          | 39   |

| 1  |                            | "Expand on any letter requested"  |
|--|----------------------------|---|
| 2  |                            | So this is the entry on the log. It says:   |
| 3  |                            | "Telephoned Alan [I think Alan is the   |
| 4  |                            | subpostmaster] as requested. He is concerned  |
| 5  |                            | that he has still not heard anything regarding  |
| 6  |                            | the loss that he is rolling. I told him that  |
| 7  |                            | I had now involved the C&SM"  |
| 8  |                            | Who was the C&SM?   |
| 9  | Α.                         | I don't remember what the job title it may be   |
| 10   |                            | contracts and service manager. I think that   |
| 11   |                            | would be Sandra's boss.   |
| 12   | Q.                         | 5   |
| 13   |                            | " who in turn has contacted Andy."  |
| 14   |                            | Who is Andy?  |
| 15   | Α.                         | I think Andy Bayfield.  |
| 16   | Q.                         | Thank you. And what was his role?   |
| 17   | Α.                         | I think he was the sort of regional service   |
| 18   |                            | manager, so this he would have been the   |
| 19   |                            | C&SM's line manager.  |
| 20   | Q.                         | "I agreed that I would make some enquiries and  |
| 21   |                            | let him know my findings. I discussed this with   |
| 22   |                            | Andy who has agreed to send another email   |
| 23   |                            | relating to the shortfall due to the Horizon  |
| 24   |                            | failure to Shaun Turner"  |
| 25   |                            | Why are you being mentioned there?<br>38  |
|  |                            | 50  |
|  |                            |   |
|  |                            |   |
| 1  |                            | roll the loss."   |
| 2  |                            | Can you explain to us what "roll the loss"  |
| 2<br>3   |                            | Can you explain to us what "roll the loss" means?   |
| 2<br>3<br>4  | A.                         | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing   |
| 2<br>3<br>4<br>5   | A.                         | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.  |
| 2<br>3<br>4<br>5<br>6  | A.<br>Q.                   | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others  |
| 2<br>3<br>4<br>5   | _                          | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | _                          | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | Q.                         | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10   | Q.                         | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11   | Q.                         | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   | Q.                         | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13   | Q.<br>A.<br>Q.             | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss<br>for?  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>13   | Q.<br>A.                   | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss<br>for?<br>I don't think there was some specific period of   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   | Q.<br>A.<br>Q.             | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss<br>for?<br>I don't think there was some specific period of<br>time. It would depend on how long the  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16   | Q.<br>A.<br>Q.<br>A.       | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss<br>for?<br>I don't think there was some specific period of<br>time. It would depend on how long the<br>investigation takes.  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17   | Q.<br>A.<br>Q.             | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss<br>for?<br>I don't think there was some specific period of<br>time. It would depend on how long the<br>investigation takes.<br>If the investigation takes quite a while, might   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | Q.<br>A.<br>Q.<br>A.       | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss<br>for?<br>I don't think there was some specific period of<br>time. It would depend on how long the<br>investigation takes.<br>If the investigation takes quite a while, might<br>it be that a subpostmaster is asked to roll the  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               | Q.<br>A.<br>Q.<br>Q.       | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss<br>for?<br>I don't think there was some specific period of<br>time. It would depend on how long the<br>investigation takes.<br>If the investigation takes quite a while, might<br>it be that a subpostmaster is asked to roll the<br>loss for quite a significant period of time?  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | Q.<br>A.<br>Q.<br>Q.<br>A. | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss<br>for?<br>I don't think there was some specific period of<br>time. It would depend on how long the<br>investigation takes.<br>If the investigation takes quite a while, might<br>it be that a subpostmaster is asked to roll the<br>loss for quite a significant period of time?<br>It could be.  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | Q.<br>A.<br>Q.<br>Q.       | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss<br>for?<br>I don't think there was some specific period of<br>time. It would depend on how long the<br>investigation takes.<br>If the investigation takes quite a while, might<br>it be that a subpostmaster is asked to roll the<br>loss for quite a significant period of time?<br>It could be.<br>Can we look at FUJ00083815, please. Sorry,  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | Q.<br>A.<br>Q.<br>Q.<br>A. | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss<br>for?<br>I don't think there was some specific period of<br>time. It would depend on how long the<br>investigation takes.<br>If the investigation takes quite a while, might<br>it be that a subpostmaster is asked to roll the<br>loss for quite a significant period of time?<br>It could be.<br>Can we look at FUJ00083815, please. Sorry,<br>that's the same document. Can we look at  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q.<br>A.<br>Q.<br>Q.<br>A. | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss<br>for?<br>I don't think there was some specific period of<br>time. It would depend on how long the<br>investigation takes.<br>If the investigation takes quite a while, might<br>it be that a subpostmaster is asked to roll the<br>loss for quite a significant period of time?<br>It could be.<br>Can we look at FUJ00083815, please. Sorry,<br>that's the same document. Can we look at<br>FUJ00083664.  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | Q.<br>A.<br>Q.<br>Q.<br>A. | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss<br>for?<br>I don't think there was some specific period of<br>time. It would depend on how long the<br>investigation takes.<br>If the investigation takes quite a while, might<br>it be that a subpostmaster is asked to roll the<br>loss for quite a significant period of time?<br>It could be.<br>Can we look at FUJ00083815, please. Sorry,<br>that's the same document. Can we look at<br>FUJ00083664.<br>Now, this is a significant email chain. I'm |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q.<br>A.<br>Q.<br>Q.<br>A. | Can you explain to us what "roll the loss"<br>means?<br>My take on this is that it means not bringing<br>the loss to account while it is investigated.<br>Was that common advice that the NBSC or others<br>gave to subpostmasters if there was a problem?<br>I don't know about the NBSC, but it I don't<br>think it would be uncommon for a service manager<br>to advise that while something was being<br>investigated.<br>Typically, how long would somebody roll the loss<br>for?<br>I don't think there was some specific period of<br>time. It would depend on how long the<br>investigation takes.<br>If the investigation takes quite a while, might<br>it be that a subpostmaster is asked to roll the<br>loss for quite a significant period of time?<br>It could be.<br>Can we look at FUJ00083815, please. Sorry,<br>that's the same document. Can we look at<br>FUJ00083664.  |

| 1  |              | at page 6 of that chain. Thank you very much.       | 1 |
|----|--------------|---|---|
| 2  |              | So we're here on 11 January 2006. It's an email     | 2 |
| 3  |              | from Sandra MacKay to yourself. What was your       | 3 |
| 4  |              | position at this time?                              | 4 |
| 5  | Α.           | I was still in the network co-ordination role.      | 5 |
| 6  | Q.           | Thank you. I'm just going to read that email.       | 6 |
| 7  |              | It says:  | 7 |
| 8  |              | "You may recall that in September the above         | 8 |
| 9  |              | office had major problems with their Horizon        | ç |
| 10 | )            | System relating to transfers between stock          | 1 |
| 11 | 1            | units."   | 1 |
| 12 | 2            | So September, that's the reference, really,         | 1 |
| 13 | 3            | to the document we've seen just now, isn't it?      | 1 |
| 14 | 4 <b>A</b> . | Yes, it is.   | 1 |
| 15 | 5 <b>Q</b> . | We're now in January:                               | 1 |
| 16 | 3            | "The [subpostmaster] has reported that he is        | 1 |
| 17 | 7            | again experiencing problems with transfers,         | 1 |
| 18 | 3            | ([5 January 2006]) which resulted in a loss of      | 1 |
| 19 | 9            | around [£43,000] which has subsequently             | 1 |
| 20 | )            | rectified itself."                                  | 2 |
| 21 | 1            | £43,000, would that have struck you as              | 2 |
| 22 | 2            | a significant sum or was that typical?              | 2 |
| 23 | 3 <b>A</b> . |   | 2 |
| 24 | 4            | have struck me as significant.                      | 2 |
| 25 | 5 <b>Q</b> . | "I know that the [subpostmaster] has reported<br>41 | 2 |
|    |              |   |   |
| 1  |              | a wider problem than an individual branch, or?      | 1 |
| 2  | Α.           | Not necessarily. But a system issue an issue        | 2 |
| 3  |              | with the Horizon System not functioning as it       | 3 |
| 4  |              | should.   | 4 |
| 5  | Q.           | Rather than, say, a hardware problem?               | 5 |
| 6  | Α.           | Yes.  | 6 |
| 7  | Q.           | Could we scroll up and look at the email above.     | 7 |
| 8  |              | This is an email from Brian Trotter to yourself.    | 8 |
| 9  |              | Who was Brian Trotter?                              | ç |
| 10 | Ο Α.         | I believe at this point he was Sandra's boss so     | 1 |
| 11 | 1            | the C&SM who was referred to earlier.               | 1 |
| 12 | 2 <b>Q</b> . | He says:  | 1 |
| 13 | 3            | "Further to Sandra's email, I visited the           | 1 |
| 14 | 4            | branch with Sandra last week and the                | 1 |
| 15 | 5            | [subpostmaster] provided clear documented           | 1 |
| 16 | 6            | evidence that something very wrong is occurring     | 1 |
| 17 | 7            | with some of the processors when carrying out       | 1 |
| 18 | 3            | transfers between stock units. To be absolutely     | 1 |
| 19 | 9            | sure from our side can we either carry out          | 1 |
| 20 | D            | a thorough check of the alleged faulty              | 2 |
| 21 | 1            | processors or swap them out."                       | 2 |
| 22 | 2            | Can we turn to the email above that, please,        | 2 |
| 23 | 3            | so that's page 5. We have here your response        | 2 |
| 24 | 4            | sorry, your email to Gary Blackburn.                | 2 |
| 25 | 5 <b>A.</b>  | Yeah.   | 2 |
|    |              | 43  |   |

| 1  |          | this to Horizon Support"   |
|--|----------|--|
| 2  |          | Horizon Support, who was that? Was that  |
| 3  |          | Fujitsu or was that yourselves?  |
| 4  | Α.       | No, I take that to mean HSD.   |
| 5  | Q.       | Thank you:   |
| 6  |          | " who have come back to him stating that   |
| 7  |          | they cannot find any problem.  |
| 8  |          | "Clearly the [subpostmaster] is concerned as   |
| 9  |          | we have just dispute number of months trying to  |
| 10   |          | sort out the first instance and he doesn't want  |
| 11   |          | a repeat performance. He is convinced that   |
| 12   |          | there is something wrong with his Horizon kit.   |
| 13   |          | I would be grateful if you could investigate   |
| 14   |          | this and give him any support that you can. I'm  |
| 15   |          | due to visit the office tomorrow to have a look  |
| 16   |          | at his paperwork and discuss the situation with  |
| 17   |          | him."  |
| 18   |          | Why were you, in particular, being contacted   |
| 19   |          | about this problem?  |
| 20   | Α.       | <b>3</b> 7   |
| 21   |          | appeared to be a system issue and, if it was   |
| 22   |          | a system issue, it was important to get that   |
| 23   |          | give that visibility to the Problem Management   |
| 24   | _        | Team.  |
| 25   | Q.       | When you say a "system issue", do you mean<br>42   |
|  |          | 72   |
|  |          |  |
|  |          |  |
| 1  | Q.       | I think you've mentioned Gary Blackburn. Who   |
| 2  | Q.       | was he?  |
| 2<br>3   | Q.<br>A. | was he?<br>Gary Blackburn was in the Problem Management  |
| 2<br>3<br>4  | Α.       | was he?<br>Gary Blackburn was in the Problem Management<br>Team in Post Office.  |
| 2<br>3<br>4<br>5   |          | was he?<br>Gary Blackburn was in the Problem Management<br>Team in Post Office.<br>You're forwarding the issue to him and you say  |
| 2<br>3<br>4<br>5<br>6  | Α.       | was he?<br>Gary Blackburn was in the Problem Management<br>Team in Post Office.<br>You're forwarding the issue to him and you say<br>there:  |
| 2<br>3<br>4<br>5<br>6<br>7   | Α.       | was he?<br>Gary Blackburn was in the Problem Management<br>Team in Post Office.<br>You're forwarding the issue to him and you say<br>there:<br>"Gary,  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | Α.       | was he?<br>Gary Blackburn was in the Problem Management<br>Team in Post Office.<br>You're forwarding the issue to him and you say<br>there:<br>"Gary,<br>"Need your advice on this branch. There   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | Α.       | was he?<br>Gary Blackburn was in the Problem Management<br>Team in Post Office.<br>You're forwarding the issue to him and you say<br>there:<br>"Gary,<br>"Need your advice on this branch. There<br>appears to be an ongoing problem at this branch  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | Α.       | was he?<br>Gary Blackburn was in the Problem Management<br>Team in Post Office.<br>You're forwarding the issue to him and you say<br>there:<br>"Gary,<br>"Need your advice on this branch. There<br>appears to be an ongoing problem at this branch<br>with transfers between SUs causing a receipts   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11   | Α.       | was he?<br>Gary Blackburn was in the Problem Management<br>Team in Post Office.<br>You're forwarding the issue to him and you say<br>there:<br>"Gary,<br>"Need your advice on this branch. There<br>appears to be an ongoing problem at this branch<br>with transfers between SUs causing a receipts<br>and payments mismatch. This first came to my   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   | Α.       | was he?<br>Gary Blackburn was in the Problem Management<br>Team in Post Office.<br>You're forwarding the issue to him and you say<br>there:<br>"Gary,<br>"Need your advice on this branch. There<br>appears to be an ongoing problem at this branch<br>with transfers between SUs causing a receipts<br>and payments mismatch. This first came to my<br>attention some 3 or 4 months ago, when the   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13   | Α.       | was he?<br>Gary Blackburn was in the Problem Management<br>Team in Post Office.<br>You're forwarding the issue to him and you say<br>there:<br>"Gary,<br>"Need your advice on this branch. There<br>appears to be an ongoing problem at this branch<br>with transfers between SUs causing a receipts<br>and payments mismatch. This first came to my<br>attention some 3 or 4 months ago, when the<br>branch was chasing up an error notice to account   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14   | Α.       | was he?<br>Gary Blackburn was in the Problem Management<br>Team in Post Office.<br>You're forwarding the issue to him and you say<br>there:<br>"Gary,<br>"Need your advice on this branch. There<br>appears to be an ongoing problem at this branch<br>with transfers between SUs causing a receipts<br>and payments mismatch. This first came to my<br>attention some 3 or 4 months ago, when the<br>branch was chasing up an error notice to account<br>for loss [et cetera]."   |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | Α.       | <ul> <li>was he?</li> <li>Gary Blackburn was in the Problem Management<br/>Team in Post Office.</li> <li>You're forwarding the issue to him and you say<br/>there:     "Gary,     "Need your advice on this branch. There<br/>appears to be an ongoing problem at this branch<br/>with transfers between SUs causing a receipts<br/>and payments mismatch. This first came to my<br/>attention some 3 or 4 months ago, when the<br/>branch was chasing up an error notice to account<br/>for loss [et cetera]."     Can we look at the final paragraph there, it<br/>says:     "Since then it appeared to have happened<br/>again, although Fujitsu are saying no issue</li> </ul>   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               | Α.       | was he?<br>Gary Blackburn was in the Problem Management<br>Team in Post Office.<br>You're forwarding the issue to him and you say<br>there:<br>"Gary,<br>"Need your advice on this branch. There<br>appears to be an ongoing problem at this branch<br>with transfers between SUs causing a receipts<br>and payments mismatch. This first came to my<br>attention some 3 or 4 months ago, when the<br>branch was chasing up an error notice to account<br>for loss [et cetera]."<br>Can we look at the final paragraph there, it<br>says:<br>"Since then it appeared to have happened<br>again, although Fujitsu are saying no issue<br>could be detected. I am concerned that there is  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | Α.       | <ul> <li>was he?</li> <li>Gary Blackburn was in the Problem Management<br/>Team in Post Office.</li> <li>You're forwarding the issue to him and you say<br/>there: <ul> <li>"Gary,</li> <li>"Need your advice on this branch. There</li> <li>appears to be an ongoing problem at this branch<br/>with transfers between SUs causing a receipts<br/>and payments mismatch. This first came to my<br/>attention some 3 or 4 months ago, when the<br/>branch was chasing up an error notice to account<br/>for loss [et cetera]."</li> <li>Can we look at the final paragraph there, it<br/>says: <ul> <li>"Since then it appeared to have happened<br/>again, although Fujitsu are saying no issue<br/>could be detected. I am concerned that there is<br/>a fundamental flaw with the branch's</li> </ul> </li> </ul></li></ul>   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | Α.       | <ul> <li>was he?</li> <li>Gary Blackburn was in the Problem Management<br/>Team in Post Office.</li> <li>You're forwarding the issue to him and you say<br/>there:     "Gary,     "Need your advice on this branch. There<br/>appears to be an ongoing problem at this branch<br/>with transfers between SUs causing a receipts<br/>and payments mismatch. This first came to my<br/>attention some 3 or 4 months ago, when the<br/>branch was chasing up an error notice to account<br/>for loss [et cetera]."     Can we look at the final paragraph there, it<br/>says:     "Since then it appeared to have happened<br/>again, although Fujitsu are saying no issue<br/>could be detected. I am concerned that there is<br/>a fundamental flaw with the branch's<br/>configuration, and would be interested to know</li> </ul>   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | Α.       | <ul> <li>was he?</li> <li>Gary Blackburn was in the Problem Management<br/>Team in Post Office.</li> <li>You're forwarding the issue to him and you say<br/>there:     "Gary,     "Need your advice on this branch. There<br/>appears to be an ongoing problem at this branch<br/>with transfers between SUs causing a receipts<br/>and payments mismatch. This first came to my<br/>attention some 3 or 4 months ago, when the<br/>branch was chasing up an error notice to account<br/>for loss [et cetera]."     Can we look at the final paragraph there, it<br/>says:     "Since then it appeared to have happened<br/>again, although Fujitsu are saying no issue<br/>could be detected. I am concerned that there is<br/>a fundamental flaw with the branch's<br/>configuration, and would be interested to know<br/>how FS"</li> </ul>                                     |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A.<br>Q. | <ul> <li>was he?</li> <li>Gary Blackburn was in the Problem Management<br/>Team in Post Office.</li> <li>You're forwarding the issue to him and you say<br/>there:     "Gary,     "Need your advice on this branch. There<br/>appears to be an ongoing problem at this branch<br/>with transfers between SUs causing a receipts<br/>and payments mismatch. This first came to my<br/>attention some 3 or 4 months ago, when the<br/>branch was chasing up an error notice to account<br/>for loss [et cetera]."     Can we look at the final paragraph there, it<br/>says:     "Since then it appeared to have happened<br/>again, although Fujitsu are saying no issue<br/>could be detected. I am concerned that there is<br/>a fundamental flaw with the branch's<br/>configuration, and would be interested to know<br/>how FS"     That's Fujitsu Services, is it?</li> </ul> |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | A.<br>Q. | <ul> <li>was he?</li> <li>Gary Blackburn was in the Problem Management<br/>Team in Post Office.</li> <li>You're forwarding the issue to him and you say<br/>there:     "Gary,     "Need your advice on this branch. There<br/>appears to be an ongoing problem at this branch<br/>with transfers between SUs causing a receipts<br/>and payments mismatch. This first came to my<br/>attention some 3 or 4 months ago, when the<br/>branch was chasing up an error notice to account<br/>for loss [et cetera]."     Can we look at the final paragraph there, it<br/>says:     "Since then it appeared to have happened<br/>again, although Fujitsu are saying no issue<br/>could be detected. I am concerned that there is<br/>a fundamental flaw with the branch's<br/>configuration, and would be interested to know<br/>how FS"     That's Fujitsu Services, is it?</li> </ul> |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A.<br>Q. | <ul> <li>was he?</li> <li>Gary Blackburn was in the Problem Management<br/>Team in Post Office.</li> <li>You're forwarding the issue to him and you say<br/>there:     "Gary,     "Need your advice on this branch. There<br/>appears to be an ongoing problem at this branch<br/>with transfers between SUs causing a receipts<br/>and payments mismatch. This first came to my<br/>attention some 3 or 4 months ago, when the<br/>branch was chasing up an error notice to account<br/>for loss [et cetera]."     Can we look at the final paragraph there, it<br/>says:     "Since then it appeared to have happened<br/>again, although Fujitsu are saying no issue<br/>could be detected. I am concerned that there is<br/>a fundamental flaw with the branch's<br/>configuration, and would be interested to know<br/>how FS"     That's Fujitsu Services, is it?</li> </ul> |

| 1  |    | So what did you believe you were doing in        |
|----|----|--|
| 2  |    | that email? Were you escalating the matter,      |
| 3  |    | raising it with somebody who would speak to      |
| 4  |    | Fujitsu, or what was the purpose?                |
| 5  | Α. | I was trying to firstly understand what was      |
| 6  |    | happening in the branch and I thought Gary would |
| 7  |    | be able to assist me with that because he had    |
| 8  |    | contacts in Fujitsu that I didn't have access    |
| 9  |    | to.  |
| 10 |    | Secondly, I'm trying to get to a position        |
| 11 |    | where we can fix this for the branch, given it   |
| 12 |    | appears to have happened in September and then   |
| 13 |    | repeated in January.                             |
| 14 | Q. | Can we scroll up, please, to page 4. There is    |
| 15 |    | an email from Liz Evans-Jones to Gary Blackburn. |
| 16 |    | Now, Liz Evans-Jones seems to be from Fujitsu;   |
| 17 |    | is that somebody you were familiar with?         |
| 18 | Α. | Only in passing but, yeah, I believe she was     |
| 19 |    | a Fujitsu problem manager, so Gary's             |
| 20 |    | counterpart.                                     |
| 21 | Q. | So she would be a direct person to speak to in   |
| 22 |    | relation to a bug in Horizon?                    |
| 23 | Α. | For Gary, yeah.                                  |
| 24 | Q. | For Gary. She says there:                        |
| 25 |    | "Hi Gary,  |
|    |    | 45   |
|    |    |  |

| 1  |    | questions occur:                                 |
|----|----|--|
| 2  |    | "Do we understand why this particular branch     |
| 3  |    | has been having problems? Or are there any       |
| 4  |    | branches in the network that have been having    |
| 5  |    | this problem?                                    |
| 6  |    | "Can the branch be front ended on the            |
| 7  |    | counter release of S90 such that it gets a fix   |
| 8  |    | as soon as possible?                             |
| 9  |    | "The email from Liz suggests that there may      |
| 10 |    | be a recurrence following S90. What degree of    |
| 11 |    | certainty do we have that it will definitely be  |
| 12 |    | fixed?"  |
| 13 |    | I mean, you've said that the amount, the         |
| 14 |    | £43,000, is an alarming amount of money.         |
| 15 | Α. | Mm.  |
| 16 | Q. | Were you concerned at this stage about           |
| 17 |    | recurrences?                                     |
| 18 | Α. | I was concerned to make sure that the S90        |
| 19 |    | release was going to fix it and I was concerned  |
| 20 |    | to make sure, as indicated by my question there, |
| 21 |    | that this was, as I believed it to be, a single  |
| 22 |    | branch that was having this problem.             |
| 23 | Q. | Can we look at POL00081928, please. It's page 6  |
| 24 |    | that I'd like to begin. Thank you. This was      |
| 25 |    | an email from Anne Chambers. Who was Anne        |
|    |    | 47   |

| 1  |    | "I have checked the call and this issue is      |
|----|----|---|
| 2  |    | scheduled to be resolved in S90.                |
| 3  |    | "S90 has already been deployed to the           |
| 4  |    | Datacentre and counter release is scheduled to  |
| 5  |    | start on [4 March 2006] due for completion      |
| 6  |    | [14 April 2006]."                               |
| 7  |    | Now, that response is sent to you. Why were     |
| 8  |    | you being kept in the loop in relation to this  |
| 9  |    | issue?  |
| 10 | Α. | So that I could keep the service manager in the |
| 11 |    | loop and therefore the branch.                  |
| 12 | Q. | Did you at this stage think that it might be    |
| 13 |    | a wider problem than just this one branch?      |
| 14 | Α. | Not at this stage, I had no reason to suspect   |
| 15 |    | that.   |
| 16 | Q. | Can we scroll up to page 3, please. So we have  |
| 17 |    | there:  |
| 18 |    | "Shaun  |
| 19 |    | "S90 fix for this problem, in the interim TC    |
| 20 |    | correction will have to continue. Let me know   |
| 21 |    | if you need any further assistance."            |
| 22 |    | Then we have an email from yourself to Gary     |
| 23 |    | Blackburn, saying:                              |
| 24 |    | "Gary,  |
| 25 |    | "Thanks for looking into this Couple of         |
|    |    | 46  |
|    |    |   |
| 1  |    | Chambers?                                       |
|    |    |   |

| 2  | Α. | I believe that she worked within Fujitsu on the   |
|----|----|---|
| 3  |    | second or third line support.   |
| 4  | Q. | And Mike Stewart?   |
| 5  | Α. | I don't know who Mike was.  |
| 6  | Q. | This is 23 February 2006, and this email isn't  |
| 7  |    | copied to you originally but it is subsequently   |
| 8  |    | forwarded to you; have you seen that?   |
| 9  | Α. | I have.   |
| 10 | Q. | I'm going to read to you briefly from Anne  |
| 11 |    | Chambers' email. If we could scroll down  |
| 12 |    | slightly, it says:  |
| 13 |    | "Haven't looked at the recent evidence, but   |
| 14 |    | I know in the past this site had hit this   |
| 15 |    | Riposte lock problem 2 or 3 times within a few  |
| 16 |    | weeks. This problem has been around for years   |
| 17 |    | and affects a number of sites most weeks, and   |
| 18 |    | finally Escher say they have done something   |
| 19 |    | about it. I am interested in whether they   |
| 20 |    | really have fixed it which [is] why I left the  |
| 21 |    | call open to remind me to check over the  |
| 22 |    |   |
| 23 |    | whole estate once S90 is live call me cynical   |
|    |    | whole estate once S90 is live call me cynical<br>but I do not just accept a 3rd party's word that |
| 24 |    |   |

| 1  |                            | "Please note that KELs tell SMC that they   |
|--|----------------------------|---|
| 2  |                            | must contact sites and warn them of balancing   |
| 3  |                            | problems if they notice the event storms caused   |
| 4  |                            | by the held lock, and advise them to reboot the   |
| 5  |                            | affected counter before continuing with the   |
| 6  |                            | balance. Unfortunately in practice it seems to  |
| 7  |                            | take SMC several hours to notice these storms by  |
| 8  |                            | which time the damage may have been done."  |
| 9  |                            | Were you aware of this problem at the time,   |
| 10   |                            | the significance of this issue?   |
| 11   | Α.                         | I don't recall reading this email. I mean, it   |
| 12   |                            | was copied to me, so I may have seen it.  |
| 13   |                            | I certainly didn't pick up on the significance  |
| 14   |                            | at the time. My main focus was getting the  |
| 15   |                            | branch or branches that were impacted by this   |
| 16   |                            | fixed, which was going to be done shortly   |
| 17   |                            | through the S90 release.  |
| 18   | Q.                         | Having heard about the Callendar Square incident  |
| 19   |                            | and the £43,000, having thought that it was   |
| 20   |                            | likely to have only related to one particular   |
| 21   |                            | branch, might this not have struck you as quite   |
| 22   |                            | concerning at the time and something really that  |
| 23   |                            | should be raised to quite a significant level   |
| 24   |                            | within the Post Office?   |
| 25   | Α.                         | I regret not being more curious about that, the   |
|  |                            | 49  |
|  |                            |   |
|  |                            |   |
| 1  | Q.                         | It says at the bottom there:  |
| 1<br>2   | Q.                         | It says at the bottom there:<br>"Please note that KELs tell SMC that they   |
| -  | Q.                         |   |
| 2  | Q.                         | "Please note that KELs tell SMC that they   |
| 2<br>3   | Q.                         | "Please note that KELs tell SMC that they must contact sites and warn them of balancing   |
| 2<br>3<br>4  | Q.                         | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused   |
| 2<br>3<br>4<br>5   | Q.                         | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"  |
| 2<br>3<br>4<br>5<br>6  | Q.                         | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?   |
| 2<br>3<br>4<br>5<br>6<br>7   |                            | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  |                            | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   |                            | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10   | А.                         | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was<br>beyond my ken.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11   | A.<br>Q.                   | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was<br>beyond my ken.<br>Do you know what an event storm is?  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   | A.<br>Q.<br>A.             | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was<br>beyond my ken.<br>Do you know what an event storm is?<br>I don't.  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13   | A.<br>Q.<br>A.             | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was<br>beyond my ken.<br>Do you know what an event storm is?<br>I don't.<br>How, at this time, did you believe a bug such as<br>this would be known to the wider Post Office  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>13   | A.<br>Q.<br>A.             | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was<br>beyond my ken.<br>Do you know what an event storm is?<br>I don't.<br>How, at this time, did you believe a bug such as  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   | A.<br>Q.<br>A.             | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was<br>beyond my ken.<br>Do you know what an event storm is?<br>I don't.<br>How, at this time, did you believe a bug such as<br>this would be known to the wider Post Office<br>community, whether it's branches or within Post   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16   | A.<br>Q.<br>Q.             | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was<br>beyond my ken.<br>Do you know what an event storm is?<br>I don't.<br>How, at this time, did you believe a bug such as<br>this would be known to the wider Post Office<br>community, whether it's branches or within Post<br>Office itself?   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | A.<br>Q.<br>Q.             | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was<br>beyond my ken.<br>Do you know what an event storm is?<br>I don't.<br>How, at this time, did you believe a bug such as<br>this would be known to the wider Post Office<br>community, whether it's branches or within Post<br>Office itself?<br>At this time, my assumption was there were two<br>things that would two processes that would   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | A.<br>Q.<br>Q.             | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was<br>beyond my ken.<br>Do you know what an event storm is?<br>I don't.<br>How, at this time, did you believe a bug such as<br>this would be known to the wider Post Office<br>community, whether it's branches or within Post<br>Office itself?<br>At this time, my assumption was there were two<br>things that would two processes that would<br>surface a bug like this. One would be receipts   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | A.<br>Q.<br>Q.             | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was<br>beyond my ken.<br>Do you know what an event storm is?<br>I don't.<br>How, at this time, did you believe a bug such as<br>this would be known to the wider Post Office<br>community, whether it's branches or within Post<br>Office itself?<br>At this time, my assumption was there were two<br>things that would two processes that would<br>surface a bug like this. One would be receipts<br>and payments mismatch messages in the branch and   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | A.<br>Q.<br>Q.<br>A.       | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was<br>beyond my ken.<br>Do you know what an event storm is?<br>I don't.<br>How, at this time, did you believe a bug such as<br>this would be known to the wider Post Office<br>community, whether it's branches or within Post<br>Office itself?<br>At this time, my assumption was there were two<br>things that would two processes that would<br>surface a bug like this. One would be receipts<br>and payments mismatch messages in the branch and<br>the other would be Fujitsu monitoring.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | A.<br>Q.<br>Q.             | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was<br>beyond my ken.<br>Do you know what an event storm is?<br>I don't.<br>How, at this time, did you believe a bug such as<br>this would be known to the wider Post Office<br>community, whether it's branches or within Post<br>Office itself?<br>At this time, my assumption was there were two<br>things that would two processes that would<br>surface a bug like this. One would be receipts<br>and payments mismatch messages in the branch and   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | A.<br>Q.<br>Q.<br>A.       | "Please note that KELs tell SMC that they<br>must contact sites and warn them of balancing<br>problems if they notice the event storms caused<br>by the held lock"<br>Do you know how event storms would be<br>noticed?<br>I don't. That's the other thing about this<br>email. There's some technical content that was<br>beyond my ken.<br>Do you know what an event storm is?<br>I don't.<br>How, at this time, did you believe a bug such as<br>this would be known to the wider Post Office<br>community, whether it's branches or within Post<br>Office itself?<br>At this time, my assumption was there were two<br>things that would two processes that would<br>surface a bug like this. One would be receipts<br>and payments mismatch messages in the branch and<br>the other would be Fujitsu monitoring.<br>Was your belief that Fujitsu monitoring was<br>infallible?         |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | A.<br>Q.<br>A.<br>Q.<br>Q. | <ul> <li>"Please note that KELs tell SMC that they must contact sites and warn them of balancing problems if they notice the event storms caused by the held lock"</li> <li>Do you know how event storms would be noticed?</li> <li>I don't. That's the other thing about this email. There's some technical content that was beyond my ken.</li> <li>Do you know what an event storm is?</li> <li>I don't.</li> <li>How, at this time, did you believe a bug such as this would be known to the wider Post Office community, whether it's branches or within Post Office itself?</li> <li>At this time, my assumption was there were two things that would two processes that would surface a bug like this. One would be receipts and payments mismatch messages in the branch and the other would be Fujitsu monitoring.</li> <li>Was your belief that Fujitsu monitoring was</li> </ul> |

| 1  |    | line where it is said that it is affecting       |
|----|----|--|
| 2  |    | several sites a week. But I think at the time,   |
| 3  |    | if I'd have read that, I would have assumed that |
| 4  |    | this was being managed through the sort of cross |
| 5  |    | to main problem management space, especially     |
| 6  |    | since Gary and Lynne were on the circulation.    |
| 7  | Q. | You had been on the distribution list of this,   |
| 8  |    | and you were also copied in or sent emails in    |
| 9  |    | the early days. I mean, dating back to 2005,     |
| 10 |    | you were involved in the Callendar Square        |
| 11 |    | incident. Is there a reason why it didn't        |
| 12 |    | strike you at the time as something more         |
| 13 |    | significant?                                     |
| 14 | Α. | I think, as I say, my focus was to make sure     |
| 15 |    | that the branch issue was fixed. I was told      |
| 16 |    | that was being done as part of the S90 release.  |
| 17 |    | My accountability, therefore, was to push that   |
| 18 |    | forward to the service manager, so that they     |
| 19 |    | could keep the branch up to date. In terms of    |
| 20 |    | this particular aspect, I would have expected    |
| 21 |    | that to be being, you know, the wider sort of    |
| 22 |    | branch impact, if there were other branches that |
| 23 |    | were being impacted by this error, to be managed |
| 24 |    | and monitored through the problem management     |
| 25 |    | process.   |
|    |    | 50   |
|    |    |  |

| 1  |    | them, they would seek to replicate that, and if |
|----|----|---|
| 2  |    | it wasn't included in their existing monitoring |
| 3  |    | processes, that it would be added.              |
| 4  | Q. | If a branch didn't contact them, because they   |
| 5  |    | didn't know about the problem or didn't connect |
| 6  |    | the dots, how would they have found out about   |
| 7  |    | the problem?                                    |
| 8  | Α. | Yeah, that's a fair point. I don't know. If     |
| 9  |    | there's no monitoring in place and the branch   |
| 10 |    | doesn't contact them, it seems to me that they  |
| 11 |    | wouldn't know about it.                         |
| 12 | Q. | If we scroll up to page 5, we have the email to |
| 13 |    | yourself from Gary Blackburn. It's the top      |
| 14 |    | email on page 5, please thank you sent to       |
| 15 |    | you on 1 March 2006:                            |
| 16 |    | "Shaun  |
| 17 |    | "It appears that Callendar Square is not        |
| 18 |    | alone with its mismatch problem. It also        |
| 19 |    | appears that Fujitsu are expecting S90 release  |
| 20 |    | to resolve this quirk.                          |
| 21 |    | "We have opened a cross-domain problem          |
| 22 |    | record. Lynne Fallowfield is the contact."      |
| 23 |    | Who was Lynne Fallowfield?                      |
| 24 | Α. | She was a colleague of Gary Blackburn's in      |
| 25 |    | Problem Management.                             |
|    |    | 52  |

| 1      | Q. | Thank you. So it's not just a matter of Anne   |
|--------|----|--|
| 2      |    | Chambers' email being forwarded to you amongst   |
| 3      |    | a large distribution list, or anything along   |
| 4      |    | those lines. I mean, it is being sent to you as  |
| 5      |    | the sole recipient by Gary Blackburn, telling  |
| 6      |    | you here that Callendar Square isn't alone with  |
| 7      |    | the mismatch problem. Again, would it not have   |
| 8      |    | struck you as significant?   |
| 9      | Α. | As I say, the key thing for me was getting the   |
| 10     |    | branch or branches that were impacted, the   |
| 11     |    | situation fixed, and I was being told that that  |
| 12     |    | would be implemented with the S90 release and,   |
| 13     |    | as I previously mentioned, my feeling at this  |
| 14     |    | time was that Fujitsu had adequate monitoring in   |
| 15     |    | place to identify these branches.  |
| 16     | Q. | But weren't you also being told by Fujitsu, that   |
| 17     |    | is Anne Chambers' email, that she's a little   |
| 18     |    | sceptical of the fix?  |
| 19     | Α. | Yes, yeah. I would expect post-S90 monitoring  |
| 20     |    | to be in place to prove that the fix had worked.   |
| 21     |    | That was normally part of the standard problem   |
| 22     | _  | management process, in my experience.  |
| 23     | Q. | Was it your experience that somebody from  |
| 24     |    | Fujitsu would put in an email that they were   |
| 25     |    | sceptical about their own fix?<br>53   |
|        |    |  |
| 1      |    | veeb   |
| 2      | Q. | yeah.<br>Were, as far as you're aware, messages being  |
| 2      | ω. | cascaded across the network to branches about  |
| 4      |    | a problem that affects balancing?  |
| -<br>5 | Α. | Not to my recollection there weren't, no.  |
| 6      | Q. | Who was responsible for passing the information  |
| 7      | ·  | to branches that didn't call the helpline?   |
| 8      | Α. | Once something like this was accepted as   |
| 9      |    | a problem, the Problem Management Team would   |
| 10     |    | consider what communications were required both  |
| 11     |    | to internal stakeholders and to branches, so   |
| 12     |    | I would see it as their accountability to make   |
| 13     |    | that judgement.  |
| 14     | Q. | We're talking about a problem that's gone on for   |
| 15     |    | years and that, as you have said I mean, in  |
| 16     |    | the Callendar Square case, £43,000, significant  |
| 17     |    | sum. Who do you think, in Post Office, was   |
| 18     |    | responsible for making that message more widely  |
| 19     |    | known?   |
| 20     | Α. | As I say, I think that would be the Problem  |
| 21     |    |  |
|        |    | Management Team.   |
| 22     | Q. | Management Team.<br>So that's a team. Who in particular?<br>I'm not sure who was heading up that area at |

- 23 A. I'm not sure who was heading up that area at
- 24 this time, but whoever is managing that
- 25 problem -- in this case Lynne Fallowfield in

| 1  | A. | I'd not seen that before. I don't think I ever   |
|----|----|--|
| 2  | А. | saw it again.                                    |
| 2  | Q. | Can we look at page 4, please. There's an email  |
| 4  | ч. | from you to Sandra MacKay and to Brian Trotter,  |
| 5  |    | and you say there:                               |
| 6  |    | "As you can see from the email below though,     |
| 7  |    | there is now recognition that this is a wider    |
| 8  |    | issue than just a software 'quirk' at just one   |
| 9  |    | branch, which means it is now being actively     |
| 10 |    | managed as a cross-domain problem within         |
| 11 |    | Fujitsu."  |
| 12 |    | Why were you sending the email to them?          |
| 13 | Α. | Predominantly to so that they could update       |
| 14 |    | Callendar Square.                                |
| 15 | Q. | So we know that this problem has been going on   |
| 16 |    | at Callendar Square since September 2005. We     |
| 17 |    | know that the software release S90 is going to   |
| 18 |    | take place in April 2006. But we know that       |
| 19 |    | there are concerns about it still existing after |
| 20 |    | the software fix. We know also now that it       |
| 21 |    | affects more than one branch. There seems to be  |
| 22 |    | in this chain a bit of a lack of urgency with    |
| 23 |    | regards to this particular problem; would you    |
| 24 |    | agree with that?                                 |
| 25 | Α. | I think things could have been done quicker,     |
|    |    | 54   |
|    |    |  |
| 1  |    | consultation with her seniors would need to      |
| 2  |    | make that judgement based on the number of       |
| 3  |    | impacted branches and the likely fix time.       |
| 4  | Q. | Did you ever have a conversation with her about  |
| 5  |    | it?  |
| 6  | Α. | Not to my recollection, no.                      |
| 7  | Q. | Who was responsible for telling auditors about   |
| 8  |    | this problem?                                    |
| 9  | Α. | Again, I would see that coming through the       |
| 10 |    | Problem Management Team. They should be          |
| 11 |    | considering internal stakeholders and branch     |

|    |    | consultation with her schiols would need to            |
|----|----|--|
| 2  |    | make that judgement based on the number of             |
| 3  |    | impacted branches and the likely fix time.             |
| 4  | Q. | Did you ever have a conversation with her about        |
| 5  |    | it?  |
| 6  | Α. | Not to my recollection, no.                            |
| 7  | Q. | Who was responsible for telling auditors about         |
| 8  |    | this problem?  |
| 9  | Α. | Again, I would see that coming through the             |
| 10 |    | Problem Management Team. They should be                |
| 11 |    | considering internal stakeholders and branch           |
| 12 |    | communications.  |
| 13 | Q. | Who was responsible for telling investigators          |
| 14 |    | and prosecutors about this problem?                    |
| 15 | Α. | The same.  |
| 16 | Q. | Were there policies and procedures in place for        |
| 17 |    | them to have raised the issue with auditors,           |
| 18 |    | investigators, prosecutors?                            |
| 19 | Α. | I was never part of the Problem Management Team        |
| 20 |    | but I believe there were processes that they           |
| 21 |    | could follow to determine who they should be           |
| 22 |    | communicating to. That was my understanding as         |
| 23 |    | an outsider to that team.                              |
| 24 | Q. | As someone who had spent a considerable part of        |
| 25 |    | your career analysing data and analysing trends,<br>56 |

| 1        |    | was the issue that was being raised here so  |
|----------|----|--|
| 2        |    | more than one branch, number of years was  |
| 3        |    | that something that you would have considered to   |
| 4        |    | be significant?  |
| 5        | Α. | Yeah, I think in the moment, yeah, it's  |
| 6        |    | significant, which is why I was asking those   |
| 7        |    | questions. But I think I would have seen it  |
| 8        |    | I think from the documentation that we saw   |
| 9        |    | earlier, the email was suggesting that the S90   |
| 10       |    | release was imminent in March 2006. So that  |
| 11       |    | would have been my focus at this time, to get  |
| 12       |    | the branch situation fixed.  |
| 13       | Q. | So I think the software fix wouldn't be complete   |
| 14       |    | until April 2006. It's been going on, at least   |
| 15       |    | from the Callendar Square incident, since  |
| 16       |    | September 2005. Did you consider the historic  |
| 17       |    | position, looking back, even if it is soon to be   |
| 18       |    | fixed, albeit in a couple of months' time, what  |
| 19       |    | about all those branches that were affected over   |
| 20       |    | the course of that year?   |
| 21       | Α. | As I say, I would have expected that to come   |
| 22<br>23 |    | through Fujitsu monitoring and be raised. If   |
| 23<br>24 |    | there were incidents earlier than Callendar  |
| 24<br>25 |    | Square, I would have expected that to have been<br>monitored by Fujitsu and raised as a problem by |
| 25       |    | 57   |
|          |    |  |
|          |    |  |
| 1        | Α. | Yeah, I don't remember receiving this particular   |
| 2        |    | email prior to getting the pack, the bundle.   |
| 3<br>4   |    | But, yeah, I can see that I was sent the email<br>and I think Lynne responded with some details of |
| 4<br>5   |    | those four branches.   |
| 6        | Q. | Can you think of why, in December 2006, you  |
| 7        | ч. | would still be being sent emails related to  |
| 8        |    | Callendar Square?  |
| 9        | Α. | I think it is because there was previous   |
| 10       |    | correspondence between Mandy Talbot and Lesley   |
| 11       |    | Joyce where the visit logs were sent, and  |
| 12       |    | I presume from the content of this email that  |
| 13       |    | Mandy Talbot may have seen the emails that were  |
| 14       |    | sent back and forth at that time and that's  |
| 15       |    | why my name is on those, so that's why she's   |
| 16       |    | sort of send out a sort of blanket email.  |
| 17       | Q. | Was the Callendar Square bug still something   |
| 18       |    | that was bubbling away in December 2006?   |
| 19       | Α. | Not in my world it wasn't, no.   |
| 20       | Q. | Do you believe it was or wasn't?   |
| 21       | Α. | I believed it had been fixed by S90.   |
| 22       | Q. | Did you check that it had been fixed by S90?   |
| 23       | Α. | I don't recall checking. That's not to say it  |
| 24       |    | didn't happen. I would have expected, as   |
| 25       |    | a matter of course, where I'd raised a problem   |
|          |    | 59   |
|          |    |  |

| 1  |    | them earlier. I had no reason at that stage to   |
|----|----|--|
| 2  |    | believe that wasn't happening.                   |
| 3  | Q. | Raised with who?                                 |
| 4  | Α. | Raised so the Fujitsu Problem Management Team    |
| 5  |    | should raise it to the POL Problem Management    |
| 6  |    | Team, across the main problem.                   |
| 7  | Q. | Can we look at POL00070134. We're now on         |
| 8  |    | 6 December 2006 and there is an email, the       |
| 9  |    | subject of which is "Callendar Square URGENT".   |
| 10 |    | You are a recipient of that email, from Mandy    |
| 11 |    | Talbot, Dispute Resolution. She says there:      |
| 12 |    | "In [February] of this year you wrote to         |
| 13 |    | Gary Blackburn and he wrote to Shaun Turner and  |
| 14 |    | then Sandra MacKay about these branches which    |
| 15 |    | had apparently registered complaints about the   |
| 16 |    | HORIZON system. Fujitsu have told us that in     |
| 17 |    | respect of Callendar Square that there was       |
| 18 |    | a problem when stock was transferred from one    |
| 19 |    | stock unit to another but this would any apply   |
| 20 |    | when there was more than one stock unit, ie more |
| 21 |    | than one position at the counter."               |
| 22 |    | So it seems as though, even in December          |
| 23 |    | 2006, you were still being sent emails relating  |
| 24 |    | to the Callendar Square. Do you remember that    |
| 25 |    | at all?  |
|    |    | 58   |

| 1  |    | with the Problem Management Team to be notified  |
|----|----|--|
| 2  |    | that it had been successfully resolved.          |
| 3  | Q. | So you would have expected the Problem           |
| 4  |    | Management Team to have kept a tab on whether    |
| 5  |    | S90 had fixed the problem or not?                |
| 6  | Α. | Yeah, once they'd got it across the main problem |
| 7  |    | record, that's the purpose, is to manage that    |
| 8  |    | through and ensure that it's resolved or         |
| 9  |    | mitigated.                                       |
| 10 | Q. | Given the significance, the sums involved, the   |
| 11 |    | length of time that it was happening, are you    |
| 12 |    | aware and did you keep tabs on whether any       |
| 13 |    | significant investigation had taken place into   |
| 14 |    | whether S90 fixed it?                            |
| 15 | Α. | I don't recall doing that but that's not to say  |
| 16 |    | that I wasn't speaking to Gary and Lynne about   |
| 17 |    | this post the implementation of S90.             |
| 18 | Q. | Having been quite a significant issue at the     |
| 19 |    | time, significant in number, significant in      |
| 20 |    | effect, is there a reason why you can't remember |
| 21 |    | whether you did or didn't?                       |
| 22 | Α. | I don't know what to say to that. I can't        |
| 23 |    | remember. So                                     |
| 24 | Q. | Was it not significant for you?                  |
| 25 | Α. | No, it was. It was significant. But I don't      |
|    |    | 60   |

| 1  |    | remember I believe subsequently, from the GLO       |
|----|----|---|
| 2  |    | findings, that it was fixed in S90. That's my       |
| 3  |    | understanding. But I don't remember speaking to     |
| 4  |    | Problem Management I would have expected            |
| 5  |    | that would have been my expected process at that    |
| 6  |    | time for something like this, and I can only        |
| 7  |    | assume that, if I had spoken to them, I would       |
| 8  |    | have been told that it had been fixed in S90.       |
| 9  | Q. | You had previously been responsible as network      |
| 10 |    | conformance and capacity manager and looking        |
| 11 |    | into things like error rates and conformance.       |
| 12 |    | Had you come across similar issues to this one      |
| 13 |    | in that role?                                       |
| 14 | Α. | No, not really, because when we're talking about    |
| 15 |    | error rates in that role, it's not branch           |
| 16 |    | balancing issues; it's more presentational          |
| 17 |    | issues or it may be not correctly sizing            |
| 18 |    | parcels, so it's not specifically related to the    |
| 19 |    | balancing process.                                  |
| 20 | Q. | How about as network co-ordination adviser?         |
| 21 |    | Were you coming across similar issues to the        |
| 22 |    | Callendar Square issue?                             |
| 23 | Α. | No, not typically, no. There were escalations       |
| 24 |    | to me about Horizon Issues but, typically, it       |
| 25 |    | was more things like engineers not being sent<br>61 |
| 1  |    | " it may be that you might have to do               |
| 2  |    | a repeat performance tomorrow once the FAD code     |
|    |    |   |

| 2  |    | a repeat performance tomorrow once the FAD codes    |
|----|----|---|
| 3  |    | had been identified and the name of the branches    |
| 4  |    | revealed", et cetera.                               |
| 5  |    | The second paragraph is the one I want to           |
| 6  |    | draw your attention to. It says:                    |
| 7  |    | "Stephen and Richard our legal team at the          |
| 8  |    | Court will be doing their best to persuade the      |
| 9  |    | Court not to allow Castleton"                       |
| 10 |    | That refers to Lee Castleton. Are you aware         |
| 11 |    | of a Lee Castleton case?                            |
| 12 | Α. | Any in passing, yes, I believe it was Marine        |
| 13 |    | Drive Post Office, I think. But not at this         |
| 14 |    | stage, I wouldn't have been aware.                  |
| 15 | Q. | So on 6 December 2006, when you're the email        |
| 16 |    | that was sent to you is being forwarded, you        |
| 17 |    | weren't involved in the Lee Castleton case in       |
| 18 |    | any way?  |
| 19 | Α. | No.   |
| 20 | Q. | Thank you. I'll just continue that email. It        |
| 21 |    | says:   |
| 22 |    | " to call this evidence because it is               |
| 23 |    | failed late and does not relate to the problems     |
| 24 |    | at his branch office. If they are successful        |
| 25 |    | there will be no need to progress any further<br>63 |

- out on time, where I needed to chase them up.
- 2 This was fairly unique.
- 3 MR BLAKE: Thank you.
- 4 Sir, it may be an appropriate time now to
- 5 take our mid-morning break.
- SIR WYN WILLIAMS: By all means, that's fine. 6
- 7 MR BLAKE: Thank you very much, could we take
- 8 15 minutes, which --
- SIR WYN WILLIAMS: Yes, 11.35? 9
- 10 MR BLAKE: Thank you very much.
- SIR WYN WILLIAMS: Thank you. 11
- (11.20 am) 12

13

- (A short break)
- 14 (11.38 am)
- 15 MR BLAKE: Thank you, Chair. Can we bring up
- POL00070133, please. Now, at the bottom of this 16
- 17 page, there is that email I took you to just
- before the break, but then that email is 18
- forwarded by Mandy Talbot to somebody called 19
- 20 Steve Parker, do you know who Steve Parker is,
- 21 was?

- Other than he worked in Fujitsu, no. 22 **A**.
- 23 Q. Yes. As you say, he worked for Fujitsu, and it
- says that he's been copied into an email 24
  - because:
- 62

| 1  |    | with these investigations but as Castleton is   |
|----|----|---|
| 2  |    | a litigant in person it is common for Judges to |
| 3  |    | be sympathetic and may allow him to rely on his |
| 4  |    | evidence. If so you will have to pull out all   |
| 5  |    | the stops to investigate what if anything went  |
| 6  |    | wrong at these branches and why we can          |
| 7  |    | distinguish them from Mr Castleton at Marine    |
| 8  |    | Drive."   |
| 9  |    | So it seems as though the Callendar Square      |
| 10 |    | case is being used potentially as an example of |
| 11 |    | an issue with Horizon in the Castleton          |
| 12 |    | proceedings; is that a fair interpretation or   |
| 13 |    | your interpretation of that email?              |
| 14 | Α. | That's a fair interpretation, I would say.      |
| 15 | Q. | Yes. Were you asked about the Callendar Square  |
| 16 |    | bug in December 2006 by anybody?                |
| 17 | Α. | Other than the email we've seen from Mandy      |
| 18 |    | Talbot, no.                                     |
| 19 | Q. | Did you know about the context in which that    |
| 20 |    | email had been sent, relating to the Lee        |
| 21 |    | Castleton case?                                 |
| 22 | Α. | Other than what is the content of the email,    |
| 23 |    | that's all I would have known at that stage.    |
| 24 | Q. | So you wouldn't have had a conversation with    |
| 25 |    | Mandy Talbot or anybody else on that bottom     |
|    |    | 64  |

| 1  |          | email about why Callendar Square is being raised   |
|--|----------|--|
| 2  |          | now?   |
| 3  | Α.       | No.  |
| 4  | Q.       | What was the relationship like between those who   |
| 5  |          | worked in NBSC and those who were involved in  |
| 6  |          | court cases, be they investigators or  |
| 7  |          | prosecutors or the legal team?   |
| 8  | Α.       | In my experience, rather distant. I don't  |
| 9  |          | recall any specific interactions with  |
| 10   |          | investigations. They were a little bit further   |
| 11   |          | down the line than where you'd be involved with  |
| 12   |          | NBSC in dealing with branches.   |
| 13   | Q.       | Would those in the NBSC ever be asked about  |
| 14   |          | common problems with Horizon or bugs, errors or  |
| 15   |          | defects?   |
| 16   | Α.       | Not to my recollection. You mean by  |
| 17   |          | investigation specifically or technically?   |
| 18   | Q.       | We see here, for example, Mandy Talbot and   |
| 19   |          | Fujitsu in correspondence about ongoing  |
| 20   |          | proceedings and that relates to, or in some way  |
| 21   |          | relates to, the Callendar Square incident. Was   |
| 22   |          | there ever any discussion, to the best of your   |
| 23   |          | recollection, with those kinds of people or  |
| 24   |          | anybody else involved in court proceedings and   |
| 25   |          | people who worked on the NBSC about bugs, errors   |
|  |          | 65   |
|  |          |  |
|  |          |  |
| 1  | Q.       | Do you recall any pressures to get on with   |
| 1<br>2   | Q.       | Do you recall any pressures to get on with<br>Horizon Online, following delays alongside these   |
|  | Q.       |  |
| 2  | Q.<br>A. | Horizon Online, following delays alongside these   |
| 2<br>3   |          | Horizon Online, following delays alongside these possible profitability issues?  |
| 2<br>3<br>4  |          | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't  |
| 2<br>3<br>4<br>5   |          | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't   |
| 2<br>3<br>4<br>5<br>6  | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.   |
| 2<br>3<br>4<br>5<br>6<br>7   | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10   | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see<br>that at the top. You're not listed there as   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10   | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see<br>that at the top. You're not listed there as<br>an attendee of this meeting, you are   |
| 2<br>3<br>4<br>5<br>7<br>8<br>9<br>10<br>11<br>12  | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see<br>that at the top. You're not listed there as<br>an attendee of this meeting, you are<br>mentioned I know you're aware of this a bit  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13   | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see<br>that at the top. You're not listed there as<br>an attendee of this meeting, you are<br>mentioned I know you're aware of this a bit<br>later on in this document, but let's see where  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>13   | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see<br>that at the top. You're not listed there as<br>an attendee of this meeting, you are<br>mentioned I know you're aware of this a bit<br>later on in this document, but let's see where<br>we get to with looking at this page. So it  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see<br>that at the top. You're not listed there as<br>an attendee of this meeting, you are<br>mentioned I know you're aware of this a bit<br>later on in this document, but let's see where<br>we get to with looking at this page. So it<br>says:   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                     | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see<br>that at the top. You're not listed there as<br>an attendee of this meeting, you are<br>mentioned I know you're aware of this a bit<br>later on in this document, but let's see where<br>we get to with looking at this page. So it<br>says:<br>"What is the issue?  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                               | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see<br>that at the top. You're not listed there as<br>an attendee of this meeting, you are<br>mentioned I know you're aware of this a bit<br>later on in this document, but let's see where<br>we get to with looking at this page. So it<br>says:<br>"What is the issue?<br>"Discrepancies showing at the Horizon   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                         | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see<br>that at the top. You're not listed there as<br>an attendee of this meeting, you are<br>mentioned I know you're aware of this a bit<br>later on in this document, but let's see where<br>we get to with looking at this page. So it<br>says:<br>"What is the issue?<br>"Discrepancies showing at the Horizon<br>counter disappear when the branch follows  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                   | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see<br>that at the top. You're not listed there as<br>an attendee of this meeting, you are<br>mentioned I know you're aware of this a bit<br>later on in this document, but let's see where<br>we get to with looking at this page. So it<br>says:<br>"What is the issue?<br>"Discrepancies showing at the Horizon<br>counter disappear when the branch follows<br>certain process steps, but will still show  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20             | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see<br>that at the top. You're not listed there as<br>an attendee of this meeting, you are<br>mentioned I know you're aware of this a bit<br>later on in this document, but let's see where<br>we get to with looking at this page. So it<br>says:<br>"What is the issue?<br>"Discrepancies showing at the Horizon<br>counter disappear when the branch follows<br>certain process steps, but will still show<br>within the back end branch account. This is   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21       | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see<br>that at the top. You're not listed there as<br>an attendee of this meeting, you are<br>mentioned I know you're aware of this a bit<br>later on in this document, but let's see where<br>we get to with looking at this page. So it<br>says:<br>"What is the issue?<br>"Discrepancies showing at the Horizon<br>counter disappear when the branch follows<br>certain process steps, but will still show<br>within the back end branch account. This is<br>currently impacting circa 40 Branches since  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22 | A.       | Horizon Online, following delays alongside these<br>possible profitability issues?<br>Not specifically, no. But then I wasn't<br>connected to the programme directly; I wasn't<br>working on the Horizon Online programme.<br>Can we look at POL00028838, please. This is the<br>issue that I'd like to ask you about. It's a<br>"Receipts/Payments Mismatch issue". We can see<br>that at the top. You're not listed there as<br>an attendee of this meeting, you are<br>mentioned I know you're aware of this a bit<br>later on in this document, but let's see where<br>we get to with looking at this page. So it<br>says:<br>"What is the issue?<br>"Discrepancies showing at the Horizon<br>counter disappear when the branch follows<br>certain process steps, but will still show<br>within the back end branch account. This is<br>currently impacting circa 40 Branches since<br>migration on to Horizon Online, with an overall |

| 1        |    | or defects within Horizon?                       |
|----------|----|--|
| 2        | Α. | No, not to my recollection, no.                  |
| 3        | Q. | I'm going to now ask you about another bug and   |
| 4        |    | now we're moving on to Horizon Online. Can we    |
| 5        |    | look at POL00034433, please. Before we go on to  |
| 6        |    | that particular bug, I just want to ask you,     |
| 7        |    | this is a document that concerns Horizon Online  |
| 8        |    | migration and it seems to have been written by   |
| 9        |    | yourself or it's got your name in the bottom     |
| 10       |    | left-hand corner. Is this a document you         |
| 11       |    | recollect?                                       |
| 12       | Α. | Only after having seen the bundle. I didn't      |
| 13       |    | recollect it before but it does appear that I'm  |
| 14       |    | the author of it, yes.                           |
| 15       | Q. | In the first paragraph there it says:            |
| 16       | ч. | "The delivery of Horizon Online is a key         |
| 17       |    | business strategy in delivering some of the cost |
| 18       |    | savings that underpin bringing the business back |
| 19       |    | into profit by 2011."                            |
| 20       |    | Do you recall at this stage, so 2010, 2011,      |
| 20       |    | there being financial pressures at the Post      |
| 21       |    | Office?  |
| 23       | Α. | In general terms, yes. But I in terms of the     |
| 23       | ~. | business benefits of Horizon Online              |
| 24<br>25 |    | specifically, I don't recall.                    |
| 20       |    | 66   |
|          |    |  |
| 4        |    | anna anainn anntinua ta vall inte a naur         |
| 1        |    | same session continues to roll into a new        |
| 2        |    | balance period."                                 |
| 3        |    | Is this something you recall at all at the       |
| 4        | •  | time? So we're here now in 2010.                 |
| 5        | Α. | Yeah, this was in the additional documents       |
| 6<br>7   |    | bundle that I received, and I think I also saw   |
| 7        |    | this in some previous evidence it may have       |
| 8        |    | been by John Simpkins and, at that point,        |
| 9        |    | I did recall there being some issue that I was   |
| 10       |    | advised of in 2010. Specifically, I remember it  |
| 11       |    | because it was in the very early days Horizon    |
| 12       |    | Online but, beyond that, in terms of the nature  |
| 13       |    | and the number of branches and what the specific |
| 14       |    | underlying technical problems were, I don't      |
| 15       | ~  | remember anything.                               |
| 16       | Q. | It says below that:                              |
| 17       |    | "At this time we have not communicated with      |
| 18       |    | branches affected and we do not believe they are |
| 19       |    | exploiting this bug intentionally."              |
| 20       |    | Now, you're somebody who has spent your          |

20 Now, you're somebody who has spent your 21 whole career at the Post Office. Are you aware

- 22 of branches not being told about bugs dependent
- 23 on whether or not they are using it
- 24 intentionally, exploiting it intentionally.
- 25 A. Only from my experience of the Callendar Square 68

| 1        |              | bug. I don't believe there was a wider                  | 1  |    | an        |
|----------|--------------|---|----|----|-----------|
| 2        |              | communication on that to branches.                      | 2  |    | un        |
| 3        | Q.           | But it seems from the wording here that it's not        | 3  |    | ľv        |
| 4        |              | being communicating because it's not being              | 4  | Q. | lt f      |
| 5        |              | exploited intentionally and they would only             | 5  |    |           |
| 6        |              | communicate if it was exploiting the bug                | 6  |    | wł        |
| 7        |              | intentionally. Do you think I've misread that           | 7  |    | int       |
| 8        |              | or do you think that is a fair reading of that          | 8  |    |           |
| 9        |              | sentence?   | 9  |    | it t      |
| 10       | Ο Α.         | Yeah, I mean, I think that's a reasonable               | 10 |    | ро        |
| 11       | 1            | reading of that sentence, yeah.                         | 11 |    | is:       |
| 12       | 2 Q.         | Do you think that the Post Office was better at         | 12 |    |           |
| 13       | 3            | communicating with branches, in respect of bugs,        | 13 |    | wł        |
| 14       | 4            | errors or defects, if the Post Office felt that         | 14 |    | аg        |
| 15       | 5            | such bug, error or defect was being exploited           | 15 |    |           |
| 16       | 3            | intentionally?  | 16 |    | thi       |
| 17       | 7 <b>A</b> . | I think my experience with bugs is it's sort            | 17 |    |           |
| 18       | 3            | of limited that I wouldn't want to make that            | 18 |    | wi        |
| 19       | 9            | judgement call more generally. I can only go on         | 19 |    |           |
| 20       | D            | where I've been involved.                               | 20 |    | со        |
| 21       | 1 Q.         | From your experience, was the Post Office better        | 21 |    |           |
| 22       |              | at communicating with branches, where the Post          | 22 |    | fro       |
| 23       | 3            | Office had something to lose?                           | 23 |    | Of        |
| 24       |              | No, I don't think so. As I say, I've not been           | 24 |    | Of        |
| - 25     |              | involved in communications or these decisions           | 25 |    | sp        |
|          |              | 69  |    |    | '         |
|          |              |   |    |    |           |
| 1        |              | confidence in the Horizon System.                       | 1  |    | Cł        |
| 2        |              | •   | 2  | Α. | ١d        |
| 3        |              | yes, and I would say that is the case in my             | 3  |    | kn        |
| 4        |              | experience.   | 4  |    | m         |
| 5        |              |   | 5  |    | im        |
| 6        |              | Largely from the messaging that was coming out          | 6  |    | lea       |
| 7        |              | from the business, particularly in the sort of          | 7  | Q. | Ca        |
| 8        |              | post-2009 period, around the robust nature of           | 8  |    | m         |
| 9        |              | the Horizon System, which does lead to                  | 9  | Α. | ١g        |
| 10       |              | particular sensitivities around any issues or           | 10 |    | ru        |
| 11       |              | any perceived issues with the Horizon System.           | 11 |    | Bu        |
| 12       |              | We know in 2009 there was the <i>Computer Weekly</i>    | 12 |    | fro       |
| 13       |              | article, for example. Was that the driver or            | 13 | Q. | W         |
| 14       |              | was there some other driver?                            | 14 | ч. | yo        |
| 15       |              | From my recollection, I think it was the                | 15 | Α. | J d       |
| 16       |              | Computer Weekly and, you know, the early days of        | 16 | Π. | the       |
| 17       |              | the Justice for Subpostmasters, were certainly          | 17 | Q. | Bo        |
| 18       |              | things that were mentioned in the business and          | 18 | ч. | lev       |
| 19       |              | where messaging was coming out to internal staff        | 19 | А. | Th        |
| 20       |              | like myself, around the sort of robust nature of        | 20 | Π. |           |
|          |              | -   | 20 |    | me<br>the |
| 21<br>22 |              | Horizon.<br>Where was that messaging coming from?       | 21 | Q. | the<br>Bi |
| 23       |              | Where was that messaging coming from?                   | 22 | ч. | Bu        |
|          |              | I don't remember specifically but senior                | 23 | А. | Ех        |
| 24       |              | leaders.<br>When you, say "conjectloaders", do you mean | 24 | А. | Th        |
| 25       | ્ર હ.        | When you, say "senior leaders", do you mean<br>71       | 25 |    | as        |
|          |              |   |    |    |           |

| 1  |                            | and it seems to me you're asking about what   |
|--|----------------------------|---|
| 2  |                            | underpins certain communication decisions, which  |
| 3  |                            | I've not been party to.   |
| 4  | Q.                         | It then goes on to say:   |
| 5  |                            | "The problem occurs as part of the process  |
| 6  |                            | when moving discrepancies on the Horizon System   |
| 7  |                            | into Local Suspense."   |
| 8  |                            | Can we turn over the page, please. Page 2,  |
| 9  |                            | it talks about the impact and it has some bullet  |
| 10   |                            | points at the bottom of that page. The impact   |
| 11   |                            | is:   |
| 12   |                            | "The branch has appeared to have balanced,  |
| 13   |                            | whereas in fact they could have a loss or   |
| 14   |                            | a gain."  |
| 15   |                            | So that's one of the fundamental uses that  |
| 16   |                            | this Inquiry is looking into. It says:  |
| 17   |                            | "Our accounting systems will be out of sync   |
| 18   |                            | with what is recorded at the branch.  |
| 19   |                            | "If widely known could cause a loss of  |
| 20   |                            | confidence in the Horizon System by branches."  |
| 21   |                            | Again, is that something you were aware of  |
| 22   |                            | from your long experience within the Post   |
| 23   |                            | Office, that there is a concern in the Post   |
| 24   |                            | Office, certainly at this time, that by   |
| 25   |                            | spreading the word there would be a loss of   |
|  |                            | 70  |
|  |                            |   |
|  |                            |   |
|  |                            |   |
| 1  |                            | Chief Executive level or below that?  |
| 2  | А.                         | I don't think I can say for certain but, you  |
| 2<br>3   | Α.                         | I don't think I can say for certain but, you know, I was a recipient of some of that  |
| 2<br>3<br>4  | Α.                         | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my   |
| 2<br>3<br>4<br>5   | Α.                         | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior  |
| 2<br>3<br>4<br>5<br>6  | Α.                         | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.   |
| 2<br>3<br>4<br>5<br>6<br>7   | A.<br>Q.                   | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | A.<br>Q.                   | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | A.<br>Q.<br>A.             | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | Q.                         | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | Q.                         | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | Q.                         | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11   | Q.                         | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.<br>When you say some way up from your level, can   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   | Q.<br>A.                   | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13   | Q.<br>A.                   | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.<br>When you say some way up from your level, can   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14   | Q.<br>A.<br>Q.             | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.<br>When you say some way up from your level, can<br>you give a name?   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   | Q.<br>A.<br>Q.             | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.<br>When you say some way up from your level, can<br>you give a name?<br>I don't know, at that stage. I can't remember  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16   | Q.<br>A.<br>Q.<br>A.       | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.<br>When you say some way up from your level, can<br>you give a name?<br>I don't know, at that stage. I can't remember<br>the structure.<br>Board level, though, again, Chief Executive<br>level?   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | Q.<br>A.<br>Q.<br>A.       | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.<br>When you say some way up from your level, can<br>you give a name?<br>I don't know, at that stage. I can't remember<br>the structure.<br>Board level, though, again, Chief Executive<br>level?<br>That this was my impression of where the   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | Q.<br>A.<br>Q.<br>Q.       | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.<br>When you say some way up from your level, can<br>you give a name?<br>I don't know, at that stage. I can't remember<br>the structure.<br>Board level, though, again, Chief Executive<br>level?<br>That this was my impression of where the<br>messaging was coming from. We received it down   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | Q.<br>A.<br>Q.<br>Q.       | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.<br>When you say some way up from your level, can<br>you give a name?<br>I don't know, at that stage. I can't remember<br>the structure.<br>Board level, though, again, Chief Executive<br>level?<br>That this was my impression of where the<br>messaging was coming from. We received it down<br>the management line.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | Q.<br>A.<br>Q.<br>Q.       | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.<br>When you say some way up from your level, can<br>you give a name?<br>I don't know, at that stage. I can't remember<br>the structure.<br>Board level, though, again, Chief Executive<br>level?<br>That this was my impression of where the<br>messaging was coming from. We received it down<br>the management line.<br>But your impression was it was coming from Chief   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | Q.<br>A.<br>Q.<br>A.<br>Q. | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.<br>When you say some way up from your level, can<br>you give a name?<br>I don't know, at that stage. I can't remember<br>the structure.<br>Board level, though, again, Chief Executive<br>level?<br>That this was my impression of where the<br>messaging was coming from. We received it down<br>the management line.<br>But your impression was it was coming from Chief<br>Executive level?   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Q.<br>A.<br>Q.<br>Q.       | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.<br>When you say some way up from your level, can<br>you give a name?<br>I don't know, at that stage. I can't remember<br>the structure.<br>Board level, though, again, Chief Executive<br>level?<br>That this was my impression of where the<br>messaging was coming from. We received it down<br>the management line.<br>But your impression was it was coming from Chief<br>Executive level?<br>That was my impression, yeah. It was |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | Q.<br>A.<br>Q.<br>A.<br>Q. | I don't think I can say for certain but, you<br>know, I was a recipient of some of that<br>messaging as it came down the chain and my<br>impression was that that was coming from senior<br>leadership.<br>Can you clarify just so that we know who you<br>mean by senior leadership?<br>I guess in my area it would be a couple or three<br>rungs up the ladder from my direct line manager.<br>But I would imagine that messaging was coming<br>from board level down.<br>When you say some way up from your level, can<br>you give a name?<br>I don't know, at that stage. I can't remember<br>the structure.<br>Board level, though, again, Chief Executive<br>level?<br>That this was my impression of where the<br>messaging was coming from. We received it down<br>the management line.<br>But your impression was it was coming from Chief<br>Executive level?   |

| 1   |          | impression would be that that would be coming   | 1   |
|---|----------|---|---|
| 2   |          | from senior leaders within the business.  | 2   |
| 3   | Q.       | "Potential impact upon ongoing legal cases where  | 3   |
| 4   |          | branches are disputing the integrity of Horizon   | 4   |
| 5   |          | Data."  | 5   |
| 6   |          | Again, was that something you were aware of?  | 6   |
| 7   | Α.       |   | 7   |
| 8   | Q.       |   | 8   |
| 9   |          | from the Computer Weekly article. Did you also  | 9   |
| 10  |          | get the impression or were you told that there  | 10 <b>A</b> .   |
| 11  |          | was concern relating to ongoing legal cases?  | 11  |
| 12  | Α.       | Yeah, yeah, certainly.  | 12  |
| 13  | Q.       | Both of those?  | 13  |
| 14  | Α.       | Yes.  | 14  |
| 15  | Q.       | "It could provide branches ammunition to blame  | 15  |
| 16  |          | Horizon for future discrepancies."  | 16 <b>Q</b> .   |
| 17  |          | Again, that's all rolled up with the same   | 17  |
| 18  |          | issue?  | 18  |
| 19  | Α.       | Yeah.   | 19  |
| 20  | Q.       | If we go over the page, please:   | 20  |
| 21  |          | "The Receipts and Payment mismatch will   | 21 <b>A</b> .   |
| 22  |          | result in an error code being generated which   | 22  |
| 23  |          | will allow Fujitsu to isolate branches affected,  | 23 <b>Q</b> .   |
| 24  |          | by this problem, although this is not seen by   | 24  |
| 25  |          | branches, we have asked Fujitsu why it has taken<br>73  | 25  |
|   |          |   |   |
|   |          |   |   |
| 1   |          | Solution Two should be progressed. Let's just   | 1   |
| 2   |          | look at those solutions briefly. We have  | 2   |
| 3   |          | Solution One:   | 3 <b>A</b> .  |
|   |          | "Alter the Horizon Branch figure at the   |   |
| 4   |          | Autor and Fiorizon Branon ligare at the   | 4 <b>Q</b> .  |
| 4<br>5  |          | counter to show the discrepancy. Fujitsu would  | 4 <b>Q</b> .<br>5   |
|   |          | counter to show the discrepancy. Fujitsu would have to manually write an entry value to the   |   |
| 5   |          | counter to show the discrepancy. Fujitsu would  | 5   |
| 5<br>6  |          | counter to show the discrepancy. Fujitsu would have to manually write an entry value to the   | 5   |
| 5<br>6<br>7   |          | counter to show the discrepancy. Fujitsu would have to manually write an entry value to the local branch account."  | 5<br>6<br>7   |
| 5<br>6<br>7<br>8  |          | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was   | 5<br>6<br>7<br>8  |
| 5<br>6<br>7<br>8<br>9<br>10<br>11   |          | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was<br>something that Fujitsu had the facility to do,   | 5<br>6<br>7<br>8<br>9   |
| 5<br>6<br>7<br>8<br>9<br>10   | А.       | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was<br>something that Fujitsu had the facility to do,<br>to manually write an entry to the local branch   | 5<br>6<br>7<br>8<br>9<br>10   |
| 5<br>6<br>7<br>8<br>9<br>10<br>11   | A.<br>Q. | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was<br>something that Fujitsu had the facility to do,<br>to manually write an entry to the local branch<br>account?<br>No.<br>It says:  | 5<br>6<br>7<br>8<br>9<br>10<br>11   |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   |          | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was<br>something that Fujitsu had the facility to do,<br>to manually write an entry to the local branch<br>account?<br>No.  | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   |
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| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   |          | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was<br>something that Fujitsu had the facility to do,<br>to manually write an entry to the local branch<br>account?<br>No.<br>It says:<br>"IMPACT When the branch comes to complete<br>next Trading Period they would have a<br>discrepancy, which they have to bring to<br>account.  | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     |          | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was<br>something that Fujitsu had the facility to do,<br>to manually write an entry to the local branch<br>account?<br>No.<br>It says:<br>"IMPACT When the branch comes to complete<br>next Trading Period they would have a<br>discrepancy, which they have to bring to<br>account.<br>"RISK this has significant data integrity   | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18   |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               |          | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was<br>something that Fujitsu had the facility to do,<br>to manually write an entry to the local branch<br>account?<br>No.<br>It says:<br>"IMPACT When the branch comes to complete<br>next Trading Period they would have a<br>discrepancy, which they have to bring to<br>account.<br>"RISK this has significant data integrity<br>concerns and could lead to questions of  | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19   |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         |          | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was<br>something that Fujitsu had the facility to do,<br>to manually write an entry to the local branch<br>account?<br>No.<br>It says:<br>"IMPACT When the branch comes to complete<br>next Trading Period they would have a<br>discrepancy, which they have to bring to<br>account.<br>"RISK this has significant data integrity<br>concerns and could lead to questions of<br>'tampering' with the branch system and could  | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20   |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   |          | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was<br>something that Fujitsu had the facility to do,<br>to manually write an entry to the local branch<br>account?<br>No.<br>It says:<br>"IMPACT When the branch comes to complete<br>next Trading Period they would have a<br>discrepancy, which they have to bring to<br>account.<br>"RISK this has significant data integrity<br>concerns and could lead to questions of<br>'tampering' with the branch system and could<br>generate questions around how the discrepancy   | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21   |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             |          | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was<br>something that Fujitsu had the facility to do,<br>to manually write an entry to the local branch<br>account?<br>No.<br>It says:<br>"IMPACT When the branch comes to complete<br>next Trading Period they would have a<br>discrepancy, which they have to bring to<br>account.<br>"RISK this has significant data integrity<br>concerns and could lead to questions of<br>'tampering' with the branch system and could<br>generate questions around how the discrepancy<br>was caused. This solution could have moral   | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22 <b>A</b> .                              |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       |          | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was<br>something that Fujitsu had the facility to do,<br>to manually write an entry to the local branch<br>account?<br>No.<br>It says:<br>"IMPACT When the branch comes to complete<br>next Trading Period they would have a<br>discrepancy, which they have to bring to<br>account.<br>"RISK this has significant data integrity<br>concerns and could lead to questions of<br>'tampering' with the branch system and could<br>generate questions around how the discrepancy<br>was caused. This solution could have moral<br>implications of Post Office changing branch data                                   | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br><b>A</b> .<br>23<br><b>Q</b> .       |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 |          | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was<br>something that Fujitsu had the facility to do,<br>to manually write an entry to the local branch<br>account?<br>No.<br>It says:<br>"IMPACT When the branch comes to complete<br>next Trading Period they would have a<br>discrepancy, which they have to bring to<br>account.<br>"RISK this has significant data integrity<br>concerns and could lead to questions of<br>'tampering' with the branch system and could<br>generate questions around how the discrepancy<br>was caused. This solution could have moral<br>implications of Post Office changing branch data<br>without informing the branch." | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br><b>A</b> .<br>23<br><b>Q</b> .<br>24 |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       |          | counter to show the discrepancy. Fujitsu would<br>have to manually write an entry value to the<br>local branch account."<br>Were you aware, at that time, that that was<br>something that Fujitsu had the facility to do,<br>to manually write an entry to the local branch<br>account?<br>No.<br>It says:<br>"IMPACT When the branch comes to complete<br>next Trading Period they would have a<br>discrepancy, which they have to bring to<br>account.<br>"RISK this has significant data integrity<br>concerns and could lead to questions of<br>'tampering' with the branch system and could<br>generate questions around how the discrepancy<br>was caused. This solution could have moral<br>implications of Post Office changing branch data                                   | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br><b>A</b> .<br>23<br><b>Q</b> .       |

| 1                 |          | so long to react to and escalate an issue which  |
|-------------------|----------|--|
| 2                 |          | began in May. They will provide feedback in due  |
| 3                 |          | course."   |
| 4                 |          | Now, we saw in relation to the earlier bug       |
| 5                 |          | that there was interaction with Fujitsu. We saw  |
| 6                 |          | that Anne Chambers email, et cetera. Was that    |
| 7                 |          | something you experienced with Fujitsu, that     |
| 8                 |          | they take a long time to react to problems such  |
| 9                 |          | as this?   |
| 10                | Α.       | I don't think typically that was my experience   |
| 11                |          | but my exposure was very limited. If I did need  |
| 12                |          | to have or put forward issues for particular     |
| 13                |          | branches, it would generally be other people     |
| 14                |          | that were having the interaction with Fujitsu    |
| 15                |          | rather than myself.                              |
| 16                | Q.       | So it wasn't something you had direct experience |
| 17                | <u> </u> | of but were you aware of any complaints from     |
| 18                |          | anybody within the Post Office about the time    |
| 19                |          | that it took for Fujitsu to react to these kinds |
| 20                |          | of issues?                                       |
| 20<br>21          | Α.       | I wasn't aware of any particular issues that     |
| 21                | Α.       | were flagged to me.                              |
| 22                | Q.       | If we go down to the "Proposal for affected      |
| 23<br>24          | ω.       | Branches", we have a number of different         |
|                   |          | solutions and the recommendation is that         |
| 25                |          | 74   |
|                   |          |  |
| 1                 |          | the Post Office of issues relating to manually   |
| 2                 |          | altering data within the branch?                 |
| 2                 | Α.       | Not to my recollection, no.                      |
| 4                 | Q.       | Solution Two, which is the one that they         |
| <del>-</del><br>5 | ω.       | recommended, was:                                |
| 6                 |          | "P&BA will journal values from the               |
| 7                 |          | discrepancy account into the Customer Account    |
| <i>'</i>          |          |  |
| 8                 |          | and recover/refund via normal processes. This    |
| 9                 |          | will need to be supported by an approved POL     |
| 10                |          | communication. Unlike the branch 'POLSAP'        |
| 11                |          | remains in balance albeit with an account        |
| 12                |          | (discrepancies) that should be cleared.          |
| 13                |          | "IMPACT Post Office will be required to          |
| 14                |          | explain the reason for a debt recovery/refund    |
| 15                |          | even though there is no discrepancy at the       |
| 16                |          | branch.  |
| 17                |          | "RISK could potentially highlight to             |
| 18                |          | branches that Horizon can lose data."            |
| 19                |          | Were you aware of a concern within the Post      |
| 20                |          | Office of highlighting to branches that Horizon  |
| 21                |          | could lose data?                                 |
| 22                | Α.       | No.  |
| 23                | Q.       | Solution Three:                                  |
| 24                |          | "It is decided not to correct the data in        |
| 25                |          | the branches (ie Post Office would prepare to    |
|                   |          | 76   |
|                   |          |  |

| 1  |    | write off the 'lost').                           |
|----|----|--|
| 2  |    | "IMPACT Post Office must absorb circa            |
| 3  |    | £20K loss.                                       |
| 4  |    | "RISK huge moral implications to the             |
| 5  |    | integrity of the business, as there are agents   |
| 6  |    | that were potentially due a cash gain on their   |
| 7  |    | system."   |
| 8  |    | Were you aware, at this stage, the               |
| 9  |    | significance of these huge moral implications,   |
| 10 |    | and debates of this nature taking place within   |
| 11 |    | the Post Office?                                 |
| 12 | Α. | Only in a more generalised sense about           |
| 13 |    | a concern, you know, after the Computer Weekly   |
| 14 |    | article about the robustness of Horizon. And,    |
| 15 |    | as I say, the messaging on that down the chain,  |
| 16 |    | to me at least, was the system is robust, it's   |
| 17 |    | audited and there is monitoring in place. But    |
| 18 |    | nothing in terms of this specific problem.       |
| 19 | Q. | If we scroll down to the next page, you're aware |
| 20 |    | that your name is mentioned there in an action   |
| 21 |    | point summary.                                   |
| 22 | Α. | Yes.   |
| 23 | Q. | It's the fourth one down, it says:               |
| 24 |    | "Branch Performance review: Confirm with         |
| 25 |    | Shaun Turner any future audits for Branches and  |
|    |    | 77   |
|    |    |  |
| 1  |    | them.  |
| 2  | Q. | We saw from the Castleton case, for example,     |
| 3  |    | earlier on, an email that had been sent to you   |
| 4  |    | being forwarded in the context of legal          |
| 5  |    | proceedings. Were you aware at this stage that   |
| 6  |    | some people were raising faults with Horizon in  |
| 7  |    | their defence in legal proceedings?              |
| 8  | Α. | In 2010?   |
| 9  | Q. | Yes.   |
| 10 | Α. | I was aware, because of the Justice for          |
| 11 |    | Subpostmasters, that yeah, that was being        |
| 12 |    | raised, yeah.                                    |
| 13 | Q. | We've seen earlier about your knowledge of the   |
| 14 |    | Callendar Square bug. Was this the time,         |
| 15 |    | perhaps, to have raised that issue more widely?  |
| 16 | Α. | Perhaps but, you know, my feeling on that bug    |
| 17 |    | was that that had been fixed and that the impact |
| 18 |    | of it would have been monitored through the two  |
| 19 |    | Problem Management Teams. So if there were       |
| 20 |    | concerns to be raised to wider stakeholders,     |
| 21 |    | I would have expected that to happen through     |
| 22 |    | that process.                                    |
| 23 | Q. | But by 2010 you had known that the Callendar     |
| 24 |    | Square bug had gone on for quite a while,        |
| 25 |    | affected quite a few branches, a significant     |
|    |    | 79   |

| 1  |          | any performance issues flagged."  |
|--|----------|---|
| 2  |          | Do you know why you're mentioned there?   |
| 3  | Α.       | I can speculate or take an educated guess, which  |
| 4  |          | would be, at this time, part of my job role was   |
| 5  |          | the production and maintenance of a sort of   |
| 6  |          | branch profile, which had the branches for all  |
| 7  |          | the network in there, which was used to as  |
| 8  |          | one of the tools to guide audits. I suspect   |
| 9  |          | that this action is to check with me that   |
| 10   |          | there's no impact from this particular issue on   |
| 11   |          | that profile.   |
| 12   | Q.       | In this period, so we're talking about October  |
| 13   |          | 2010 or thereabouts, we know that, for example,   |
| 14   |          | Seema Misra, a subpostmistress, was being   |
| 15   |          | prosecuted. Did anyone ever discuss with you  |
| 16   |          | these kinds of concerns and the potential impact  |
| 17   |          | that they may have on ongoing legal cases?  |
| 18   | Α.       | No.   |
| 19   | Q.       | Were you aware, at this stage, that people were   |
| 20   |          | being prosecuted for shortfalls on Horizon?   |
| 21   | Α.       | I was aware that there was a business process to  |
| 22   |          | do so. But, yeah, in terms of direct  |
| 23   |          | involvement or interactions with those  |
| 24   |          | individuals in the business that were pursuing  |
| 25   |          | those cases, I didn't have any contact with   |
|  |          | /8  |
|  |          | 78  |
|  |          |   |
| 1  |          | sum. You're now informed about an issue   |
| 2  |          | sum. You're now informed about an issue relating to the receipts and payments mismatch  |
| 2<br>3   |          | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had  |
| 2<br>3<br>4  |          | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not  |
| 2<br>3<br>4<br>5   |          | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is   |
| 2<br>3<br>4<br>5<br>6  |          | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?   |
| 2<br>3<br>4<br>5<br>6<br>7   | А.       | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | А.       | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | A.       | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | Α.       | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these<br>issues.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11   | A.<br>Q. | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these<br>issues.<br>Do you think the teams were acting in silos and  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   | A.<br>Q. | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these<br>issues.<br>Do you think the teams were acting in silos and<br>weren't really communicating with each other in   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13   |          | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these<br>issues.<br>Do you think the teams were acting in silos and<br>weren't really communicating with each other in<br>respect of bugs, errors and defects in Horizon?  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                     | Α.       | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these<br>issues.<br>Do you think the teams were acting in silos and<br>weren't really communicating with each other in<br>respect of bugs, errors and defects in Horizon?<br>Which teams do you mean?  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                               |          | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these<br>issues.<br>Do you think the teams were acting in silos and<br>weren't really communicating with each other in<br>respect of bugs, errors and defects in Horizon?<br>Which teams do you mean?<br>You often refer to other teams dealing with   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                         | Α.       | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these<br>issues.<br>Do you think the teams were acting in silos and<br>weren't really communicating with each other in<br>respect of bugs, errors and defects in Horizon?<br>Which teams do you mean?<br>You often refer to other teams dealing with<br>issues and it not being within your sphere at  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                   | Α.       | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these<br>issues.<br>Do you think the teams were acting in silos and<br>weren't really communicating with each other in<br>respect of bugs, errors and defects in Horizon?<br>Which teams do you mean?<br>You often refer to other teams dealing with<br>issues and it not being within your sphere at<br>that time. Was that caused by any inherent  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>2<br>3<br>14<br>15<br>16<br>17<br>18               | A.<br>Q. | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these<br>issues.<br>Do you think the teams were acting in silos and<br>weren't really communicating with each other in<br>respect of bugs, errors and defects in Horizon?<br>Which teams do you mean?<br>You often refer to other teams dealing with<br>issues and it not being within your sphere at<br>that time. Was that caused by any inherent<br>problem with the structure at the Post Office?  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19       | Α.       | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these<br>issues.<br>Do you think the teams were acting in silos and<br>weren't really communicating with each other in<br>respect of bugs, errors and defects in Horizon?<br>Which teams do you mean?<br>You often refer to other teams dealing with<br>issues and it not being within your sphere at<br>that time. Was that caused by any inherent<br>problem with the structure at the Post Office?<br>I think I mean, I think the reason, in the  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>23<br>14<br>15<br>16<br>17<br>18<br>19<br>20       | A.<br>Q. | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these<br>issues.<br>Do you think the teams were acting in silos and<br>weren't really communicating with each other in<br>respect of bugs, errors and defects in Horizon?<br>Which teams do you mean?<br>You often refer to other teams dealing with<br>issues and it not being within your sphere at<br>that time. Was that caused by any inherent<br>problem with the structure at the Post Office?<br>I think I mean, I think the reason, in the<br>Callendar Square case, for example, that  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>23<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21 | A.<br>Q. | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these<br>issues.<br>Do you think the teams were acting in silos and<br>weren't really communicating with each other in<br>respect of bugs, errors and defects in Horizon?<br>Which teams do you mean?<br>You often refer to other teams dealing with<br>issues and it not being within your sphere at<br>that time. Was that caused by any inherent<br>problem with the structure at the Post Office?<br>I think I mean, I think the reason, in the<br>Callendar Square case, for example, that<br>I wanted to get that in a Problem Management, |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>23<br>14<br>15<br>16<br>17<br>18<br>19<br>20       | A.<br>Q. | sum. You're now informed about an issue<br>relating to the receipts and payments mismatch<br>in Horizon Online. The knowledge that you had<br>developed over those years, was that not<br>something that you thought "Actually, this is<br>an issue now"?<br>I don't think it's so much that; I think it is<br>that I had a kind of institutional trust in the<br>processes and teams that were managing these<br>issues.<br>Do you think the teams were acting in silos and<br>weren't really communicating with each other in<br>respect of bugs, errors and defects in Horizon?<br>Which teams do you mean?<br>You often refer to other teams dealing with<br>issues and it not being within your sphere at<br>that time. Was that caused by any inherent<br>problem with the structure at the Post Office?<br>I think I mean, I think the reason, in the<br>Callendar Square case, for example, that  |

- the expertise, the people with the contacts. SoI don't think there was -- from my perspective
  - 80

| 1  |          | at least, at this time that there was sort of   |
|--|----------|---|
| 2  |          | institutional or process failings, as such. In  |
| 3  |          | retrospective, I think you can make that  |
| 4  |          | argument, certainly.  |
| 5  | Q.       | Because there was this team that existed that   |
| 6  |          | you could pass over the problem to and it no  |
| 7  |          | longer became your problem?   |
| 8  | Α.       | Well, I don't see it like that; I see it as   |
| 9  |          | passing it to the individuals who are most  |
| 10   |          | appropriate to resolve that particular issue for  |
| 11   |          | the branch.   |
| 12   | Q.       | During this period, so 2010, you were the branch  |
| 13   |          | standards data analyst. In that role, you made  |
| 14   |          | outbound calls, I think, to branches to tackle  |
| 15   |          | common issues; is that right?   |
| 16   | Α.       | Yeah, conformance and compliance issues, yeah.  |
| 17   | Q.       | Can you tell us how such calls would be made?   |
| 18   |          | What was the process involved? Why would you  |
| 19   |          | call branches?  |
| 20   | Α.       | So we had streams of compliance data coming in  |
| 21   |          | to the team. So this would be things like mails   |
| 22   |          | data or cash declaration data, and that was   |
| 23   |          | analysed by myself and a colleague, and we would  |
| 24   |          | identify sets of branches to pull together  |
| 25   |          | a call campaign based on their performance.   |
|  |          | 81  |
|  |          |   |
| 1  | Α.       | Proactive calls? No, I wasn't aware of  |
| 2  |          | anything.   |
| 3  | Q.       | How, in your view, would an issue such as this  |
| 4  |          | receipts and payments mismatch issue in 2010 be   |
| 5  |          | cascaded down to branches, branches that didn't   |
| 6  |          | know that they were affect by the bug?  |
| 7  | Α.       | Well, if a decision was made to communicate it,   |
| 8  |          | there was the sort of weekly Counter News,  |
| 9  |          | I would imagine, or Branch Focus, I think it may  |
| 10   |          | have been named at that stage, or Memo View,  |
| 11   |          | through the which is a broadcast, messaging   |
| 12   |          |   |
| 13   |          | broadcast. Those would be typically the   |
|  |          | broadcast. Those would be typically the channels down to the branch, if we were going to  |
| 14   |          | 51 5  |
| 14<br>15                                     |          | channels down to the branch, if we were going to  |
|  | Q.       | channels down to the branch, if we were going to communicate.   |
| 15   | Q.       | channels down to the branch, if we were going to communicate.<br>What would they typically have said about  |
| 15<br>16                                     | Q.       | channels down to the branch, if we were going to<br>communicate.<br>What would they typically have said about<br>an issue such as this receipts and payments  |
| 15<br>16<br>17                               | Q.<br>A. | channels down to the branch, if we were going to<br>communicate.<br>What would they typically have said about<br>an issue such as this receipts and payments<br>issue?  |
| 15<br>16<br>17<br>18                         | Q.<br>A. | channels down to the branch, if we were going to<br>communicate.<br>What would they typically have said about<br>an issue such as this receipts and payments<br>issue?<br>I don't know. I wasn't involved in  |
| 15<br>16<br>17<br>18<br>19                   | Q.<br>A. | channels down to the branch, if we were going to<br>communicate.<br>What would they typically have said about<br>an issue such as this receipts and payments<br>issue?<br>I don't know. I wasn't involved in<br>communications so I can't say what, typically,  |
| 15<br>16<br>17<br>18<br>19<br>20             | Q.<br>A. | channels down to the branch, if we were going to<br>communicate.<br>What would they typically have said about<br>an issue such as this receipts and payments<br>issue?<br>I don't know. I wasn't involved in<br>communications so I can't say what, typically,<br>the messages would say. But I would imagine it  |
| 15<br>16<br>17<br>18<br>19<br>20<br>21       | Q.<br>A. | channels down to the branch, if we were going to<br>communicate.<br>What would they typically have said about<br>an issue such as this receipts and payments<br>issue?<br>I don't know. I wasn't involved in<br>communications so I can't say what, typically,<br>the messages would say. But I would imagine it<br>would outline the nature of the problem and   |
| 15<br>16<br>17<br>18<br>19<br>20<br>21<br>22 | Q.<br>A. | channels down to the branch, if we were going to<br>communicate.<br>What would they typically have said about<br>an issue such as this receipts and payments<br>issue?<br>I don't know. I wasn't involved in<br>communications so I can't say what, typically,<br>the messages would say. But I would imagine it<br>would outline the nature of the problem and<br>advise branches on how to avoid any sequences of |

25 Q. Taking this one as an example, if that didn't

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| 1  |    | So you'd be looking at the branches that        |
|----|----|---|
| 2  |    | were struggling the most with, say, oversized   |
| 3  |    | mails, identify those, upload them for the team |
| 4  |    | and then they would make outbound calls to the  |
| 5  |    | branches to do some coaching.                   |
| 6  | Q. | Was there a process of making outbound calls to |
| 7  |    | branches that may be affected by bugs, errors   |
| 8  |    | and defects in Horizon?                         |
| 9  | Α. | Not in the team that I was in at this stage, it |
| 10 |    | was conformance and compliance.                 |
| 11 | Q. | Was there a team that was carrying out, to the  |
| 12 |    | best of your knowledge, those kinds of outbound |
| 13 |    | calls?  |
| 14 | Α. | If there was, I it would be HSD, I would say,   |
| 15 |    | and then further down the line, if there was    |
| 16 |    | discrepancies, it may well be that P&BA and     |
| 17 |    | Chesterfield or the contracts adviser would     |
| 18 |    | become involved.                                |
| 19 | Q. | But the idea of making these proactive calls,   |
| 20 |    | which is what you were doing for a certain type |
| 21 |    | of problem                                      |
| 22 | Α. | Yes.  |
| 23 | Q. | are you aware of an equivalent of that in       |
| 24 |    | relation to bugs, errors and defects with       |
| 25 |    | Horizon?  |
|    |    | 82  |
|    |    |   |
| 1  |    | happen, would you be concerned by it?           |
| 2  | Α. | It depends on the bug and the level of branches |
| 3  |    | impacted and how robust the monitoring is to    |
| 4  |    | ensure that we're picking up any other impacted |
| 5  |    | branches.                                       |
| 6  | Q. | So we have here "Receipts/Payments Mismatch"    |
| 7  |    | affecting circa 40 branches, Horizon Online,    |
| 8  |    | overall cash value of £20,000 loss. In those    |
| 9  |    | circumstances, would you have expected it to    |
|    |    |   |

| 0  |  |
|----|--|
| 9  | circumstances, would you have expected it to   |
| 10 | have been communicated via those channels that |
| 11 | vou've just described?                         |

12 A. Um, yeah, as I say, I wasn't involved in the 13 decision-making process around communications 14 but, to me, it feels significant enough that we 15 would want to communicate something. 16 **Q.** Are you aware of the processes involved in how 17 that communication took place? 18 A. As I say, it would either be through Branch 19 Focus or, if it was more urgent, it would go 20 through the message broadcast service. But in 21 terms of the sort of process for generating that 22 communication, as I say, that would generally 23 come through the problem management process and then to internal stakeholders and the comms team 24

ultimately to distribute.

25

| 1  | Q. | I'm going to take you to an even later problem,  |
|----|----|--|
| 2  |    | and that's the smart ID receipts and payments    |
| 3  |    | mismatch you've mentioned in your statement.     |
| 4  |    | Can we look at POL00043585, please. So this is   |
| 5  |    | a very late issue in the context of this         |
| 6  |    | Inquiry. We have the date there, 27 November     |
| 7  |    | 2018. Are you aware of this occurring?           |
| 8  | Α. | Yes.   |
| 9  | Q. | Yes. Are you aware that this was during the      |
| 10 |    | Group Litigation against the Post Office?        |
| 11 | Α. | Yes.   |
| 12 | Q. | Can you summarise for us, looking there at the   |
| 13 |    | incident detail, what issue this caused in       |
| 14 |    | recording transactions?                          |
| 15 | Α. | I believe it caused a receipts and payments      |
| 16 |    | mismatch in the branch.                          |
| 17 | Q. | You're named there, "Shaun Turner, Enhanced User |
| 18 |    | Management Product Owner". Why are you named as  |
| 19 |    | having attended that update?                     |
| 20 | Α. | At this time, I was working on the Enhanced User |
| 21 |    | Management Programme as a product owner, and     |
| 22 |    | that role involved taking the business           |
| 23 |    | requirements to the technical teams to build the |
| 24 |    | solution.  |
| 25 | Q. |  |
|    |    | 85   |
|    |    |  |
| 1  |    | that this one seems to have been escalated in    |
| 2  |    | 2018?  |
| 3  | Α. | I don't know. This was my first exposure to      |
| 4  |    | a kind of forum like this.                       |
| 5  | Q. | Did you question why it was taking place?        |
| 6  | Α. | Well, I knew why it was taking place. It was to  |
| 7  |    | drive the solution for the bug that we'd         |
| 8  |    | encountered in the network.                      |
| 9  | Q. | l mean, you have quite significant people from   |
| 10 |    | the business there, Angela van den Bogerd we've  |
| 11 |    | heard about, and others. You also have the head  |
| 12 |    | of Legal, Rodric Williams, attending this        |
| 13 |    | meeting. Did it strike you as surprising that    |
| 14 |    | an incident was being raised among such          |
| 15 |    | a significant group of people?                   |
| 16 | Α. | Not considering the business context at the      |
| 17 |    | time, no.  |
| 18 | Q. | What was that context?                           |
| 19 | Α. | The ongoing GLO proceedings.                     |
| 20 | Q. | Do you think it would have been helpful to have  |
| 21 |    | had meetings of this sort involving senior       |
| 22 |    | individuals within the Post Office and Fujitsu   |
| 23 |    | discussing earlier incidents of the type that    |
| 24 |    | we've discussed today?                           |
| 25 | Α. | In hindsight, yes.                               |
|    |    | 87   |

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|------------|----|------|

| on IT | - Inq | uiry 28 February 2                               |
|-------|-------|--|
|       |       |  |
| 1     |       | having been aware of the bug in 2010, the        |
| 2     |       | receipts and payments mismatch issue that we     |
| 3     |       | just looked at, now being told in 2018 about     |
| 4     |       | this particular incident, were you concerned     |
| 5     |       | about the integrity of Horizon?                  |
| 6     | Α.    | I was concerned about this bug and the impact it |
| 7     |       | might have. As to why the questions about the    |
| 8     |       | integrity, I                                     |
| 9     | Q.    | Were people at this meeting discussing historic  |
| 10    |       | issues, historic bugs?                           |
| 11    | Α.    | No.  |
| 12    | Q.    | Did you, at this meeting, mention those two      |
| 13    |       | incidents that you had previous knowledge of?    |
| 14    | Α.    | Not to my recollection, no.                      |
| 15    | Q.    | There are a large number of people named here as |
| 16    |       | having attended, both from the Post Office and   |
| 17    |       | also we see from Fujitsu. We see Steve Bansal,   |
| 18    |       | Pete Newsome. Do you remember Fujitsu people     |
| 19    |       | attending?                                       |
| 20    | Α.    | Yeah, I do remember there were Fujitsu           |
| 21    |       | attendees, yeah.                                 |
| 22    | Q.    | Do you know when the Post Office started raising |
| 23    |       | incidents such as this with such a wide group of |
| 24    |       | individuals? Was there a particular moment in    |
| 25    |       | time when these issues were escalated in the way |
|       |       | 86   |
|       |       |  |
| 1     | Q.    | Do you know by this stage, as late as 2018, how  |
| 2     |       | this incident was being cascaded down to         |
| 3     |       | branches?  |
| 4     | Α.    | I don't recall specifically the communications   |
| 5     |       | to the branches but I believe there is mention   |
| 6     |       | of communication to the branches further down    |
| 7     |       | this document.                                   |
| 8     | Q.    | Perhaps we can look down page 3. There's         |
| 9     |       | mention of Impact there:                         |
| 10    |       | "As of [22 January 2019] 19 branches are         |
| 11    |       | impacted. Impacts are:                           |
| 12    |       | "Confusion for the user.                         |
| 13    |       | "Transactions accounted for against the          |
| 14    |       | wrong BP/TP.                                     |
| 15    |       | "Calls into contact centres from                 |
| 16    |       | users/branches impacted.                         |
| 17    |       | "Remedial action required by POL to resolve      |
| 18    |       | cases."  |
| 19    |       | Now, are you aware of there being                |
| 20    |       | a significant effort to notify branches,         |
| 21    |       | branches that may not know that they're affected |
| 22    |       | by this incident, that it is a known incident.   |
| 23    | Α.    | In terms of the sort of branches that were       |

identified by Fujitsu, there was a specific

process to contact those branches, discuss the

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| 1  |    | cause of the issue and the branch and rectify    | 1  |    | seen apologies, like I can't find it at          |
|----|----|--|----|----|--|
| 2  | _  | any accounting issues.                           | 2  |    | the moment, but it is one of these Horizon issue |
| 3  | Q. | In terms of branches that hadn't been identified | 3  |    | management reports where it mentions wider       |
| 4  |    | by Fujitsu, was there a way of notifying them of | 4  |    | communications to branches that are on Smart ID. |
| 5  |    | this particular incident, an incident that       | 5  |    | I think I provided a later version of this       |
| 6  |    | presumably has an affect on the cash balancing?  | 6  |    | particular report. Could we bring that up?       |
| 7  | Α. | As I say, I think further down in this           | 7  | Q. | We may not need to. I can ask you a very broad   |
| 8  |    | I think it's this document, there is mention of  | 8  |    | question, which is are you aware, as at 2018 or  |
| 9  |    | a wider communication to branches that were on   | 9  |    | as at now, of a policy being in place within the |
| 10 |    | Smart ID at this point. I don't recall the       | 10 |    | Post Office that, if you get a significant       |
| 11 |    | content of that communication.                   | 11 |    | incident that affects cash account balances,     |
| 12 | Q. | We can scroll down, if you like.                 | 12 |    | that it is distributed widely across the network |
| 13 | Α. | Yeah, sorry the top of that page there, "BAU     | 13 |    | to as many subpostmasters as you possibly can,   |
| 14 |    | impact".   | 14 |    | as many branches as you possibly can?            |
| 15 | Q. | So:  | 15 | Α. | I'm not aware of a policy to that effect. I can  |
| 16 |    | "Contact centres minimal impact                  | 16 |    | only reflect on my experience of this particular |
| 17 |    | "Live service desk: minimal impact               | 17 |    | incident, which I believe the project manager    |
| 18 |    | "Finance Service centre: minimal impact          | 18 |    | tried to manage with maximum transparency, both  |
| 19 |    | Transaction correction team are contacting       | 19 |    | with internal stakeholders and with the branches |
| 20 |    | branches to ensure accounts balance."            | 20 |    | that are impacted.                               |
| 21 |    | Do you know if that is affected branches or      | 21 | Q. | Can we look at POL00037819. This is a paper      |
| 22 |    | those that are known to be affected or do you    | 22 | -  | that seems to have been written by you. Do you   |
| 23 |    | think that's contacting branches more broadly?   | 23 |    | remember this paper?                             |
| 24 | Α. | I think that is the branches that are impacted   | 24 | Α. | l do.  |
| 25 | Π. | but there is some documentation that I have      | 25 | Q. |  |
| 20 |    | 89   | 20 | ч. | 90   |
|    |    |  |    |    |  |
|    |    |  | 4  |    |  |
| 1  |    | be the same issue. Can you tell me if it is in   | 1  |    | paragraph 282 of your witness statement, listed  |
| 2  |    | fact the same issue. It's 4.3, "Receipts &       | 2  |    | a wide range of people who were kept in the loop |
| 3  |    | Payments Misbalances FIXED [September] 2019".    | 3  |    | about this particular issue.                     |
| 4  | _  | Yeah, that's the same issue.                     | 4  | Α. | Mm-hm.   |
| 5  | Q. | So it seems there the issue was fixed a year     | 5  | Q. | You said that Esther Harvey sought to ensure     |
| 6  |    | after that earlier paper. So it took quite       | 6  |    | various internal stakeholders were informed.     |
| 7  |    | a while to fix; do you remember it taking quite  | 7  |    | Who is Esther Harvey?                            |
| 8  |    | a while to fix that issue?                       | 8  | Α. | She was the project manager for the Smart ID or  |
| 9  | Α. | Yeah.  | 9  |    | Enhanced User Management Programme.              |
| 10 | Q. | I'll just read that for the record. It says:     | 10 | Q. | Why was she responsible for ensuring various     |
| 11 |    | "Multiple login functionality allowed a user     | 11 |    | internal stakeholders were informed about this   |
| 12 |    | with the same Horizon ID to be logged in at      | 12 |    | issue?   |
| 13 |    | more than one terminal providing any one of the  | 13 | Α. | That was part of her role as project manager.    |
| 14 |    | sessions was active Fujitsu identified in        | 14 | Q. | Which stakeholders do you have in mind when you  |
| 15 |    | cases where an SU or Office Balance was          | 15 |    | refer to informing stakeholders?                 |
| 16 |    | initiated in those circumstances then it could   | 16 | Α. | The Smart ID project team itself, in the first   |
| 17 |    | cause receipts and payments misbalances in the   | 17 |    | instance, so that would have been myself and my  |
| 18 |    | branch which had to be corrected by              | 18 |    | colleagues that were working on the Smart ID     |
| 19 |    | a Transaction Corrections.                       | 19 |    | project; Angela van den Bogerd; Julie Thomas,    |
| 20 |    | "These issues were fixed by the Horizon          | 20 |    | who was the project sponsor; the relevant        |
| 21 |    | release in September/October 2019, which put in  | 21 |    | parties in the FSC, which was the Finance        |
| 22 |    | place further controls on multiple logins        | 22 |    | Service Centre in Chesterfield, who would be     |
| 23 |    | related to Stock Unit and Branch Balancing and   | 23 |    | dealing with any rectification of accounts. So   |
| 24 |    | changing Stock Units."                           | 24 |    | that would kind of be broadly the ones I'm       |
| 25 |    | You have in your witness statement, it's         | 25 |    | thinking of.                                     |
|    |    | 91   |    |    | 92   |
|    |    |  |    |    |  |

| parties in the FSC, which was the Finance      |
|--|
| Service Centre in Chesterfield, who would be   |
| dealing with any rectification of accounts. So |
| that would kind of be broadly the ones I'm     |
| thinking of.                                   |
| 92   |

| 1  | Q. | How high up within the Post Office was this        |
|----|----|--|
| 2  |    | receipts and payments misbalancing issue known,    |
| 3  |    | 2018/2019?   |
| 4  | Α. | At quite senior levels, I would say. I mean        |
| 5  |    | Angela van den Bogerd was certainly quite senior   |
| 6  |    | and involved with the GLO.                         |
| 7  | Q. | Do you think it went above her?                    |
| 8  | Α. | l couldn't say.                                    |
| 9  | Q. | What was the relevance of this particular issue    |
| 10 |    | to the GLO?  |
| 11 | Α. | Well, because the GLO were looking at Horizon      |
| 12 |    | Issues, bugs, defects, and obviously this was      |
| 13 |    | a defect that was causing impacting accounts,      |
| 14 |    | branch accounts.                                   |
| 15 | Q. | Can you remember any conversations with anyone     |
| 16 |    | in management within the Post Office about the     |
| 17 |    | significance of this issue in that context?        |
| 18 | Α. | Not that I had, no.                                |
| 19 | Q. | Are you aware of any conversations that others     |
| 20 |    | had?   |
| 21 | Α. | Not in terms of the content but I'm aware that     |
| 22 |    | conversations were held with Julie Thomas and      |
| 23 |    | Angela van den Bogerd and, of course, they were    |
| 24 |    | on the weekly calls that we were having to track   |
| 25 |    | and monitor this, which is sort of documented in   |
|    |    | 93   |
|    |    |  |
| 1  |    | about bugs quickly enough, in my view. So yeah,    |
| 2  |    | I would agree that, following reflection, there    |
| 3  |    | should have been better management of Fujitsu.     |
| 4  | Q. | You say you weren't finding out about them         |
| 5  |    | enough or quickly enough. Whose responsibility     |
| 6  |    | was that on either side?                           |
| 7  | Α. | My as I say, my understanding is, in terms of      |
| 8  |    | the incident management and problem management     |
| 9  |    | processes, is that it should be flagged through    |
| 10 |    | that route. Where there are issues with the        |
| 11 |    | system, it should be raised as across the main     |
| 12 |    | problem and managed with communications going      |
| 13 |    | out to branches as appropriate.                    |
| 14 | Q. | Raised by who?                                     |
| 15 | Α. | In cases where the branch is aware of it, the      |
| 16 |    | branch, or from Fujitsu themselves through their   |
| 17 |    | monitoring. So it should be raised by the          |
| 18 |    | branch to Horizon System helpdesk and then by      |
| 19 |    | Fujitsu across the Post Office, if it's            |
| 20 |    | something that's going to impact multiple          |
| 21 | ~  | branches.  |
| 22 | Q. | Has that improved in recent months, years?         |
| 23 | Α. | Well, I can only go on the experience that I've    |
| 24 |    | had with the Smart ID bug and I did find, in       |
| 25 |    | that particular case, that Fujitsu were very<br>95 |
|    |    | 33   |

| 1  |    | the reports that we brought up earlier.   |
|--|----|---|
| 2  | Q. | You say in your statement at paragraph 296 that   |
| 3  |    | this is an example which shows that the Post  |
| 4  |    | Office's management of Fujitsu was lacking. Can   |
| 5  |    | you tell us what you mean by that?  |
| 6  | Α. | There was when this happened, not least   |
| 7  |    | because we were going through the GLO at the  |
| 8  |    | time, there was a lot of soul searching within  |
| 9  |    | the team about how this had occurred and whether  |
| 10   |    | we could have done anything to identify it.   |
| 11   |    | And, at least from my perspective, I felt   |
| 12   |    | that these kind of issues, given that the   |
| 13   |    | functionality that led to this was a change,  |
| 14   |    | a significant change to the way that user   |
| 15   |    | management was managed on Horizon, I personally   |
| 16   |    | felt that this should have been flagged to us as  |
| 17   |    | part to the impact assessment of those changes.   |
| 18   |    | such that we could have avoided these issues.   |
| 19   | Q. | Have you reflected on previous bugs, errors and   |
| 20   | α. | defects that you've identified or been involved   |
| 20<br>21                                     |    | in and whether, in those particular cases, there  |
| 21   |    | were issues with the management of Fujitsu?   |
|  | •  |   |
| 23   | Α. | I think particularly since the GLO findings and   |
| 24   |    | being aware of some of the points made in those   |
| 25   |    | cases, I would say, yes, we weren't finding out   |
|  |    | 94  |
|  |    |   |
| 1  |    | quick to react, they did a lot of work in terms   |
| 2  |    | of identifying not just the scenarios that had  |
| 3  |    | caused issues in the live estate but also other   |
| 4  |    | potential scenarios that could potentially cause  |
| 5  |    | issues in the live estate from the same sort of   |
| 6  |    | functionality. So, yeah, my experience was that   |
| 7  |    |   |
| -  |    | that was improved, if you looked back, compared   |
| 8  | ~  | to something like the Callendar Square issue.   |
| 9<br>10                                      | Q. | Was there a marked shift of any sort following,   |
| 10   |    |   |
| 11   |    | for example, the Group Litigation or since the  |
| 40   |    | for example, the Group Litigation or since the beginning of this Inquiry?   |
| 12   | Α. | for example, the Group Litigation or since the<br>beginning of this Inquiry?<br>My exposure has been through, you know, some  |
| 13   | Α. | for example, the Group Litigation or since the<br>beginning of this Inquiry?<br>My exposure has been through, you know, some<br>very limited windows where I have been dealing  |
| 13<br>14                                     | A. | for example, the Group Litigation or since the<br>beginning of this Inquiry?<br>My exposure has been through, you know, some<br>very limited windows where I have been dealing<br>with bugs. So I can only say that compared to   |
| 13<br>14<br>15                               | A. | for example, the Group Litigation or since the<br>beginning of this Inquiry?<br>My exposure has been through, you know, some<br>very limited windows where I have been dealing<br>with bugs. So I can only say that compared to<br>the Callendar Square, my experience of working   |
| 13<br>14<br>15<br>16                         | А. | for example, the Group Litigation or since the<br>beginning of this Inquiry?<br>My exposure has been through, you know, some<br>very limited windows where I have been dealing<br>with bugs. So I can only say that compared to<br>the Callendar Square, my experience of working<br>with Fujitsu collaboratively to resolve the  |
| 13<br>14<br>15<br>16<br>17                   | Α. | for example, the Group Litigation or since the<br>beginning of this Inquiry?<br>My exposure has been through, you know, some<br>very limited windows where I have been dealing<br>with bugs. So I can only say that compared to<br>the Callendar Square, my experience of working<br>with Fujitsu collaboratively to resolve the<br>Smart ID EUM bug in 2018 was much improved.   |
| 13<br>14<br>15<br>16<br>17<br>18             | Α. | for example, the Group Litigation or since the<br>beginning of this Inquiry?<br>My exposure has been through, you know, some<br>very limited windows where I have been dealing<br>with bugs. So I can only say that compared to<br>the Callendar Square, my experience of working<br>with Fujitsu collaboratively to resolve the<br>Smart ID EUM bug in 2018 was much improved.<br>We had a good working relationship with  |
| 13<br>14<br>15<br>16<br>17                   | Α. | for example, the Group Litigation or since the<br>beginning of this Inquiry?<br>My exposure has been through, you know, some<br>very limited windows where I have been dealing<br>with bugs. So I can only say that compared to<br>the Callendar Square, my experience of working<br>with Fujitsu collaboratively to resolve the<br>Smart ID EUM bug in 2018 was much improved.<br>We had a good working relationship with<br>Fujitsu at that time. I found them very helpful   |
| 13<br>14<br>15<br>16<br>17<br>18             | Α. | for example, the Group Litigation or since the<br>beginning of this Inquiry?<br>My exposure has been through, you know, some<br>very limited windows where I have been dealing<br>with bugs. So I can only say that compared to<br>the Callendar Square, my experience of working<br>with Fujitsu collaboratively to resolve the<br>Smart ID EUM bug in 2018 was much improved.<br>We had a good working relationship with  |
| 13<br>14<br>15<br>16<br>17<br>18<br>19       | A. | for example, the Group Litigation or since the<br>beginning of this Inquiry?<br>My exposure has been through, you know, some<br>very limited windows where I have been dealing<br>with bugs. So I can only say that compared to<br>the Callendar Square, my experience of working<br>with Fujitsu collaboratively to resolve the<br>Smart ID EUM bug in 2018 was much improved.<br>We had a good working relationship with<br>Fujitsu at that time. I found them very helpful   |
| 13<br>14<br>15<br>16<br>17<br>18<br>19<br>20 | Α. | for example, the Group Litigation or since the<br>beginning of this Inquiry?<br>My exposure has been through, you know, some<br>very limited windows where I have been dealing<br>with bugs. So I can only say that compared to<br>the Callendar Square, my experience of working<br>with Fujitsu collaboratively to resolve the<br>Smart ID EUM bug in 2018 was much improved.<br>We had a good working relationship with<br>Fujitsu at that time. I found them very helpful<br>and, as I say, there was a there was |

24 Q. I'm going to move on now to a few discrete

cause the receipts and payments mismatches.

23

25 issues. I won't be very long with them but

| 4      |    | process and can we go to POL00039024. You've dealt with this at paragraph 137 of your |
|--------|----|---|
| -<br>5 |    | statement. This is a document from October  |
| 6      |    | 2007. Can you briefly tell us what your   |
| 7      |    | involvement was in issues concerning transaction                                      |
| 8      |    | corrections?  |
| 9      | Α. | With this particular document, I think I stated                                       |
| 10     |    | this in my witness statement, my colleague Nicky                                      |
| 11     |    | Barraclough wrote the document. I was I'm   |
| 12     |    | listed as a contributor here and I believe that                                       |
| 13     |    | my contributions were predominantly reviewing   |
| 14     |    | the process flows, the process flows in the   |
| 15     |    | document, and also the reporting that are in the                                      |
| 16     |    | appendices the spreadsheets that we use to  |
| 17     |    | manage deductions from remuneration.  |
| 18     | Q. | Thank you. I'm just going to take you to two  |
| 19     |    | passages in this document and the first is on   |
| 20     |    | page 2, and it's the bottom of page 2,  |
| 21     |    | "Timeliness of Issuing Transaction Correction",                                       |
| 22     |    | it says:  |
| 23     |    | "The time taken to issue Transaction  |
| 24     |    | Corrections can be slow, including some cases   |
| 25     |    | where it has taken 2 years to clear the ledger.<br>97                                 |
| 1      | Q. | If we go over the page to page 3 there's another                                      |

|   | 2  |    | section on "Disputing the Transaction            |
|---|----|----|--|
|   | 3  |    | Correction". It's the first paragraph there      |
|   | 4  |    | that I would like to ask you about. It says:     |
|   | 5  |    | "The current process for disputing               |
|   | 6  |    | Transaction Corrections allows the subpostmaster |
|   | 7  |    | to challenge the error at every stage of the     |
|   | 8  |    | process, even after pressing the button on the   |
|   | 9  |    | Horizon System to settle the debt centrally.     |
|   | 10 |    | This delays the process in recovering any        |
|   | 11 |    | outstanding monies, and can be used as           |
|   | 12 |    | a deliberate delaying tactic in order to delay   |
|   | 13 |    | making payment."                                 |
|   | 14 |    | Is that something that you remember?             |
|   | 15 | Α. | Not specifically. No.                            |
|   | 16 | Q. | The mention there of a deliberate delaying       |
|   | 17 |    | tactic, do you recall a culture within the Post  |
|   | 18 |    | Office to assume that subpostmasters, assistants |
|   | 19 |    | and others were up to no good or using           |
| 2 | 20 |    | particular tactics to delay payments?            |
| 2 | 21 | Α. | No, not to my knowledge, no.                     |
| 2 | 22 | Q. | Thank you. Totally different topic, the PING     |
| 2 | 23 |    | Project. Can we look at FUJ00091292, please.     |
| : | 24 |    | Very briefly, because you have dealt with it in  |
| : | 25 |    | your witness statement, what was the PING<br>99  |
|   |    |    |  |

| 1  |    | Not only does this delay the time taken to       |
|----|----|--|
| 2  |    | recover outstanding debt, but it also leaves the |
| 3  |    | subpostmaster feeling frustrated that they are   |
| 4  |    | being notified to rectify a mistake that they    |
| 5  |    | may not remember, or where the evidence has been |
| 6  |    | destroyed that would support a dispute to the    |
| 7  |    | Transaction Correction."                         |
| 8  |    | This is 2007. Is this something that you         |
| 9  |    | remember, an issue that you remember?            |
| 10 | Α. | Yeah, I remember concerns about the length of    |
| 11 |    | time it took to issue transaction corrections.   |
| 12 | Q. | Looking at it from 2007, was that a historic     |
| 13 |    | issue at a particular point in time, in 2007, or |
| 14 |    | something that continued after this document had |
| 15 |    | been written?                                    |
| 16 | Α. | I don't think it was any different, in my        |
| 17 |    | experience at least, before this document. But   |
| 18 |    | there were always issues that branches would     |
| 19 |    | raise about the length of time it was taking to  |
| 20 |    | create an issue, transaction corrections to      |
| 21 |    | them. I think some of it, from my recollection,  |
| 22 |    | was tied to getting information from clients,    |
| 23 |    | which often had, sort of, long lead times. But,  |
| 24 |    | yeah, it's not an issue that suddenly appeared   |
| 25 |    | in 2007.   |
|    |    | 98   |

| 1  |    | Project?  |
|----|----|---|
| 2  | Α. | The PING Project was a way of improving the       |
| 3  |    | accounting for third-party terminals, for         |
| 4  |    | example the Camelot Lottery terminal. Before      |
| 5  |    | the PING Project was implemented, branches would  |
| 6  |    | have to key their transactions into the Lottery   |
| 7  |    | terminal as they were doing Lottery sales, and    |
| 8  |    | so forth, and then they would go and key that     |
| 9  |    | into Horizon for accounting purposes. What the    |
| 10 |    | PING Project sought to do was remove that human   |
| 11 |    | input by harvesting the transactions directly     |
| 12 |    | from the third party terminal, eg the Lottery     |
| 13 |    | terminal, and send those over to Horizon as       |
| 14 |    | transaction acknowledgements.                     |
| 15 | Q. | Thank you. If we turn to page 5, you're listed    |
| 16 |    | as a reviewer in respect of this particular       |
| 17 |    | document.   |
| 18 | Α. | Yes.  |
| 19 | Q. | If we look at page 9, there is the background.    |
| 20 |    | I just want to briefly take you to that           |
| 21 |    | background. It's the second paragraph and down.   |
| 22 |    | It says:  |
| 23 |    | "The client data is uploaded into POL-FS and      |
| 24 |    | compared with the equivalent HNG-X data which     |
| 25 |    | has to be manually input by the agent/counter 100 |

| 1        |    | clerk. Ideally the data, when compared, should                                      |
|----------|----|---|
| 2        |    | be the same but number of conformance issues  |
| 3        |    | have been identified where agents/counter clerks                                    |
| 4        |    | do not perform end of day routines correctly, do                                    |
| 5        |    | not input the Camelot details into HNG-X as they                                    |
| 6        |    | should, and can key incorrect figures, leaving                                      |
| 7        |    | Product and Branch Accounting with  |
| 8        |    | a reconciliation difference. This difference  |
| 9        |    | may require the issuing of a transaction  |
| 10       |    | correction."  |
| 11       |    | Can you tell us what a "conformance issue"  |
| 12       |    | is?   |
| 13       | Α. | In this particular context, I believe it means                                      |
| 14       |    | either not inputting the lottery figures into                                       |
| 15       |    | Horizon at the end of the day or inputting them                                     |
| 16       |    | incorrectly, such that there would be   |
| 17       |    | a mismatch.   |
| 18       | Q. | In terms of non-conformance, is that something                                      |
| 19       |    | that the Post Office generally understood would                                     |
| 20       |    | happen?   |
| 21       | Α. | Yeah, I mean, it's reliant on the postmaster in                                     |
| 22       |    | branch keying figures and keying figures  |
| 23       |    | correctly.  |
| 24       | Q. | To what extent do you think the Post Office put                                     |
| 25       |    | too much emphasis on conformance issues rather                                      |
|          |    | 101   |
|          |    |   |
| 1        |    | develop, easier to develop, so that new products                                    |
| 2        |    | could be brought on more easily. That was the                                       |
| 3        |    | sense that I got when I joined that programme.                                      |
| 4        | Q. |   |
| 5        | Α. | I wasn't party to those sort of contractual   |
| 6        |    | discussions. I don't remember anybody talking                                       |
| 7        |    | to me about what the options were and whether                                       |
| 8        |    | there were other alternatives that we'd looked                                      |
| 9        |    | at.   |
| 10       | Q. | Do you know why the decision was taken to   |
| 11       |    | withdraw from that project?   |
| 12       | Α. | I wasn't directly involved but I did hear   |
| 13       |    | suggestions that there were concerns over cost                                      |
| 14       |    | and there were concerns over whether it would be                                    |
| 15       |    | deliverable to the timescales we needed it to                                       |
| 16       |    | be. I think this was not just a simple  |
| 17       |    | changeover, like Horizon Online, where we were                                      |
| 18       |    | introducing new software; it was hardware, data                                     |
| 19       |    | centre and the front office as well, so it was                                      |
| 20       |    | a considerable challenge.   |
| 21       | MR | BLAKE: Thank you very much, Mr Turner. Those  |
|          |    | , , ,   |
| 22       |    | are all of my questions.  |
| 22<br>23 |    | are all of my questions.<br>I think Mr Stein has some questions.                    |
|          |    | are all of my questions.<br>I think Mr Stein has some questions.<br>Mr Whittam? No. |

24 Mr Whittam? No.
25 Oh, and Ms Page has a question as well. 103

| 1  |    | than, for example, bugs, errors and defects,     |
|----|----|--|
| 2  |    | historically, or                                 |
| 3  | Α. | <b>3</b> 7                                       |
| 4  |    | managing conformance for a number of years, and  |
| 5  |    | I think, in retrospective, there should have     |
| 6  |    | been there certainly should have been more       |
| 7  |    | focus on bugs and issues and the management of   |
| 8  |    | those bugs and issues but it was still important |
| 9  |    | to manage conformance. We had contracts with     |
| 10 |    | clients, Royal Mail being most notable, that if  |
| 11 |    | we didn't achieve certain levels of performance, |
| 12 |    | we were financially penalised.                   |
| 13 |    | But, in terms of the balance between those       |
| 14 |    | two things, I think an argument can be made that |
| 15 |    | we should have put more emphasis on bugs and     |
| 16 |    | defects, certainly.                              |
| 17 | Q. | Thank you. My final issue is IBM, who you've     |
| 18 |    | mentioned in your witness statement. Between     |
| 19 |    | December 2015 and March 2017 you were business   |
| 20 |    | readiness lead and that involved working with    |
| 21 |    | IBM to replace Horizon. Do you know why the      |
| 22 |    | Post Office wanted to replace Horizon at that    |
| 23 |    | stage?   |
| 24 | Α. | I think it's just old technology and it was time |
| 25 |    | to move on to something that was quicker to 102  |

| 1  | We'll start with Mr Stein.                              |
|----|---|
| 2  | Questioned by MR STEIN                                  |
| 3  | MR STEIN: Sir, I'm grateful, my learned friend,         |
| 4  | Mr Blake, raised the question, sir, this morning        |
| 5  | of disclosure and I'm just going to pause to            |
| 6  | note that on 14 February this year, we wrote to         |
| 7  | the Inquiry concerning the difficulties with            |
| 8  | disclosure and, indeed, concerning the                  |
| 9  | difficulties that the lack of closure of scripts        |
| 10 | and other documents were going to be causing us         |
| 11 | with putting forward questions for this witness,        |
| 12 | Mr Turner.  |
| 13 | So I'm going to ask that that letter be                 |
| 14 | resent so that it goes directly to you, sir, and        |
| 15 | therefore you can see how it is that we frame           |
| 16 | matters at that date. That wasn't the first             |
| 17 | time, sir, we've raised issues regarding                |
| 18 | scripts.  |
| 19 | With that as a starting point, I'll now move            |
| 20 | to my questions for Mr Turner.                          |
| 21 | Mr Turner, as you've heard from Mr Blake and            |
| 22 | indeed myself, there have been some issues              |
| 23 | regarding disclosure that may inhibit our               |
| 24 | ability to ask you some wider questions and that        |
| 25 | could cause, therefore, a need for you to return<br>104 |

| 1        |    | to the witness box at a later stage.   |
|----------|----|--|
| 2        | Α. | Okay.  |
| 3        | Q. | I'm just going to refer you to your own  |
| 4        |    | statement, I'll read a part of it, paragraph 12,   |
| 5        |    | page 5. You refer to your role to analyse the  |
| 6        |    | data arising from calls to identify trends and   |
| 7        |    | common issues experienced by subpostmasters.   |
| 8        | Α. | Yes.   |
| 9        | Q. | Okay. Do you call yourself a data analyst?   |
| 10       |    | What would be the term that you would use?   |
| 11       | Α. | At that time it was incident analyst.  |
| 12       | Q. | Incident analyst. Right. Now, help us on the   |
| 13       |    | other side of the calls from the subpostmasters.   |
| 14       |    | You were aware at that time that Fujitsu also  |
| 15       |    | had their own helpdesk taking calls?   |
| 16       | Α. | Yes.   |
| 17       | Q. | We know that because indeed you have spoken  |
| 18       |    | today about the fact that some calls were taken  |
| 19       |    | by the Post Office team and some were taken by   |
| 20       |    | Fujitsu; is that correct?  |
| 21       | A. | That's correct.  |
| 22       | Q. | Right. Now the analysis of common issues   |
| 23       |    | experienced by subpostmasters, that job would  |
| 24       |    | need to be shared, I assume, between the Post  |
| 25       |    | Office and Fujitsu?<br>105   |
|          |    |  |
|          |    |  |
| 1        | ~  | analysts myself.   |
| 2        | Q. | That was going to be my next question which is:  |
| 3<br>4   |    | how were these things tied together? If it   |
| 4<br>5   |    | wasn't tight together at your level at that  |
| 6        |    | time, at what level was it tied together and who<br>can you direct us to, who should be able to know |
| 7        |    | how these things came together?  |
| ,<br>8   | Α. | There were forums at our level where common  |
| 0<br>9   | Π. | issues were discussed. I didn't have any direct  |
| 9<br>10  |    | contact with their equivalent of the incident  |
| 11       |    | analysts but there were forums between the   |
| 12       |    | helpdesks. But I would imagine if there were   |
| 13       |    | common themes coming through, these should have  |
| 14       |    | been raised throughout the problem management  |
| 15       |    | process and then managed at that level between   |
| 16       |    | the two Problem Management Teams.  |
| 17       |    | And then there was a Service Management  |
| 18       |    | Forum, as well, where the two parties met to   |
| 19       |    | similarly discuss problems.  |
| 20       | Q. | The numbers of calls, in terms of working out  |
| 21       |    | numbers of calls coming into the Post Office   |
| 22       |    | helpdesk versus Fujitsu, can you give us an idea   |
| 23       |    | whether this was an even spread of 50/50 that  |
| 24       |    | came into the Post Office versus Fujitsu, or   |
| <u> </u> |    |  |
| 25       |    | whether it was more Post Office or more Fujitsu?   |

| õ  | <b>.</b> |  |
|----|----------|--|
| 9  |          | "should" and the words "I would have             |
| 10 |          | expected"  |
| 11 | Α.       | Yes.   |
| 12 | Q.       | in relation to those sorts of systems. Now,      |
| 13 |          | clearly you can give evidence about the Post     |
| 14 |          | Office system. What knowledge did you have at    |
| 15 |          | this time about the Fujitsu equivalent systems?  |
| 16 | Α.       | I'm trying to remember. I know there was         |
| 17 |          | documentation that showed how Fujitsu should     |
| 18 |          | manage incidents and track common themes, and    |
| 19 |          | that would have been the basis from my           |
| 20 |          | knowledge. My sort of layman's view of it was    |
| 21 |          | that they would be replicating something very    |
| 22 |          | similar to what we were doing in the NBSC. In    |
| 23 |          | other words, they would have some kind of data   |
| 24 |          | team that was looking at trends. I didn't have   |
| 25 |          | any direct contact with their own incident       |
| 25 |          | 106  |
|    |          |  |
|    |          |  |
| 1  |          | Have you got any                                 |
| 2  | Α.       | I'm sorry, I don't recall the numbers or the     |
| 3  |          | sort of volumetric data at this stage.           |
| 4  | Q.       | Just remaining with this question, you've        |
| 5  |          | explained that there should have been something  |
| 6  |          | operating in a similar way by way of incident    |
| 7  |          | analysis with Fujitsu?                           |
| 8  | Α.       | Yes.   |
| 9  | Q.       | Did you see documents that would have provided   |
| 10 |          | the other side of the coin, the Fujitsu side of  |
| 11 |          | the coin, and your documents synthesised, put    |
| 12 |          | together, so that you've got a picture? Did you  |
| 13 |          | see such things?                                 |
| 14 | Α.       | Not to my recollection, no.                      |
| 15 | Q.       | Were there such things?                          |
| 16 | Щ.<br>А. | I don't know after this amount of time. There    |
| 17 | Π.       | were forums where common issues were discussed.  |
| 18 |          | so there was some interaction between the two    |
|    |          |  |
| 19 |          | helpdesks, and we tried to resolve issues,       |
| 20 |          | operational issues through those forums as well. |
| 21 |          | But I don't remember seeing specific             |
| 22 |          | documentation other than what I've referred to   |
| 23 |          | in my witness statement.                         |
| 24 | Q.       | Just before I then ask you a little bit more     |
| 25 |          | about how documents were kept, shouldn't there   |
|    |          | 108  |

A. Yes, so the -- both helpdesks should have had

included analysis of calls coming in, trends,

and I would expect that if system issues were

Problem Management Team, if appropriate.

Q. Now, within that answer you used the word

an incident management framework in place that

coming through, common system issues, that that would manifest in HSD and be raised to their

| 1  |                                  | have been documents that provided a combination   |
|--|----------------------------------|---|
| 2  |                                  | of these are the issues we are seeing within POL  |
| 3  |                                  | and these are the issues we are seeing within   |
| 4  |                                  | Fujitsu, and they are showing similar issues  |
| 5  |                                  | being raised or similar problems or good things   |
| 6  |                                  | or indeed bad things. Shouldn't such things   |
| 7  |                                  | have existed and shouldn't they have come to  |
| 8  |                                  | you?  |
| 9  | Α.                               | Yes, yeah.  |
| 10   | Q.                               | Now, you have remained at the Post Office for   |
| 11   |                                  | quite some time, indeed I think it's essentially  |
| 12   |                                  | your career so far?   |
| 13   | Α.                               | That's right.   |
| 14   | Q.                               | You describe in your statement the analyst work   |
| 15   |                                  | you carried out in relation to incidents. Can   |
| 16   |                                  | you just help us with access to those, the  |
| 17   |                                  | analysis that you've carried out. There must  |
| 18   |                                  | be, going back now to what, the early days of   |
| 19   |                                  | Horizon and then through, there must be hundreds  |
| 20   |                                  | of these documents that you've been created or  |
| 21   |                                  | been part of the creation of; where are they?   |
| 22   | Α.                               | What type of documents are you talking about,   |
| 23   |                                  | specifically?   |
| 24   | Q.                               | Well, let's go with the analysis of the NBSC  |
| 25   |                                  | call performance, call operating performance, as  |
|  |                                  | 109   |
|  |                                  |   |
|  |                                  |   |
| 1  | Α.                               | It would be an incident analysis report on  |
| 1<br>2   | A.                               | It would be an incident analysis report on topic X and, if the problem was raised, it would   |
|  | Α.                               | 2 1   |
| 2  | A.<br>Q.                         | topic X and, if the problem was raised, it would  |
| 2<br>3   |                                  | topic X and, if the problem was raised, it would<br>be a problem record on that topic.  |
| 2<br>3<br>4  |                                  | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this   |
| 2<br>3<br>4<br>5   | Q.                               | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?   |
| 2<br>3<br>4<br>5<br>6  | Q.<br>A.                         | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.   |
| 2<br>3<br>4<br>5<br>6<br>7   | Q.<br>A.<br>Q.                   | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | Q.<br>A.<br>Q.                   | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | Q.<br>A.<br>Q.<br>A.             | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10   | Q.<br>A.<br>Q.<br>A.             | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.<br>Have you been asked by either the Post Office or   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10   | Q.<br>A.<br>Q.<br>A.             | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.<br>Have you been asked by either the Post Office or<br>lawyers on their behalf regarding your knowledge   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   | Q.<br>A.<br>Q.<br>Q.             | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.<br>Have you been asked by either the Post Office or<br>lawyers on their behalf regarding your knowledge<br>of access to this material where it might be?  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13   | Q.<br>A.<br>Q.<br>Q.<br>A.       | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.<br>Have you been asked by either the Post Office or<br>lawyers on their behalf regarding your knowledge<br>of access to this material where it might be?<br>No.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14   | Q.<br>A.<br>Q.<br>Q.<br>A.       | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.<br>Have you been asked by either the Post Office or<br>lawyers on their behalf regarding your knowledge<br>of access to this material where it might be?<br>No.<br>Despite the fact that you're the author of such  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   | Q.<br>A.<br>Q.<br>Q.<br>Q.       | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.<br>Have you been asked by either the Post Office or<br>lawyers on their behalf regarding your knowledge<br>of access to this material where it might be?<br>No.<br>Despite the fact that you're the author of such<br>documentation over time?  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                     | Q.<br>A.<br>Q.<br>Q.<br>A.<br>Q. | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.<br>Have you been asked by either the Post Office or<br>lawyers on their behalf regarding your knowledge<br>of access to this material where it might be?<br>No.<br>Despite the fact that you're the author of such<br>documentation over time?<br>Yes.<br>Now, I'm just going to complete this particular<br>topic range. Oversight of the helpdesk, this is  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                               | Q.<br>A.<br>Q.<br>Q.<br>A.<br>Q. | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.<br>Have you been asked by either the Post Office or<br>lawyers on their behalf regarding your knowledge<br>of access to this material where it might be?<br>No.<br>Despite the fact that you're the author of such<br>documentation over time?<br>Yes.<br>Now, I'm just going to complete this particular   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                         | Q.<br>A.<br>Q.<br>Q.<br>A.<br>Q. | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.<br>Have you been asked by either the Post Office or<br>lawyers on their behalf regarding your knowledge<br>of access to this material where it might be?<br>No.<br>Despite the fact that you're the author of such<br>documentation over time?<br>Yes.<br>Now, I'm just going to complete this particular<br>topic range. Oversight of the helpdesk, this is  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                   | Q.<br>A.<br>Q.<br>Q.<br>A.<br>Q. | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.<br>Have you been asked by either the Post Office or<br>lawyers on their behalf regarding your knowledge<br>of access to this material where it might be?<br>No.<br>Despite the fact that you're the author of such<br>documentation over time?<br>Yes.<br>Now, I'm just going to complete this particular<br>topic range. Oversight of the helpdesk, this is<br>the Fujitsu helpdesk. Now, you would expect,  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20             | Q.<br>A.<br>Q.<br>Q.<br>A.<br>Q. | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.<br>Have you been asked by either the Post Office or<br>lawyers on their behalf regarding your knowledge<br>of access to this material where it might be?<br>No.<br>Despite the fact that you're the author of such<br>documentation over time?<br>Yes.<br>Now, I'm just going to complete this particular<br>topic range. Oversight of the helpdesk, this is<br>the Fujitsu helpdesk. Now, you would expect,<br>I imagine, that Fujitsu should carry out its own  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21       | Q.<br>A.<br>Q.<br>Q.<br>A.<br>Q. | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.<br>Have you been asked by either the Post Office or<br>lawyers on their behalf regarding your knowledge<br>of access to this material where it might be?<br>No.<br>Despite the fact that you're the author of such<br>documentation over time?<br>Yes.<br>Now, I'm just going to complete this particular<br>topic range. Oversight of the helpdesk, this is<br>the Fujitsu helpdesk. Now, you would expect,<br>I imagine, that Fujitsu should carry out its own<br>oversight, governance operation regarding   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22 | Q.<br>A.<br>Q.<br>Q.<br>A.<br>Q. | topic X and, if the problem was raised, it would<br>be a problem record on that topic.<br>Do you have access to systems that contain this<br>documentation?<br>I don't.<br>Help us why not?<br>The passage of time. I've moved through various<br>roles since then.<br>Have you been asked by either the Post Office or<br>lawyers on their behalf regarding your knowledge<br>of access to this material where it might be?<br>No.<br>Despite the fact that you're the author of such<br>documentation over time?<br>Yes.<br>Now, I'm just going to complete this particular<br>topic range. Oversight of the helpdesk, this is<br>the Fujitsu helpdesk. Now, you would expect,<br>I imagine, that Fujitsu should carry out its own<br>oversight, governance operation regarding<br>helpdesk; okay? Who within Post Office |

| 1  |    | an example, or trends within difficulties being  |
|----|----|--|
| 2  |    | experienced by subpostmasters. Where are these   |
| 3  |    | documents?                                       |
| 4  | Α. | I don't know at the moment. There certainly      |
| 5  |    | were reports produced. I know where problems     |
| 6  |    | were raised off the back of those reports they   |
| 7  |    | were logged in a system that we used at that     |
| 8  |    | time called Remedy, which was                    |
| 9  | Q. | Did you say "Remedy"?                            |
| 10 | Α. | Remedy, yes, which was both the incident         |
| 11 |    | management tool and also the problem management  |
| 12 |    | tool so that's where the calls were logged, and  |
| 13 |    | any problems that were raised to the Problem     |
| 14 |    | Management Team were also logged in there with   |
| 15 |    | the originator.                                  |
| 16 | Q. | We've encountered some problems with terminology |
| 17 |    | being used, so scripts for helpdesks are         |
| 18 |    | sometimes called other names other than scripts? |
| 19 | Α. | Right.   |
| 20 | Q. | Okay? So help us identify, the analysis work     |
| 21 |    | you would have carried out, so this was the      |
| 22 |    | analysis to identify trends and common issues    |
| 23 |    | experienced by subpostmasters, what would have   |
| 24 |    | been the title or what would be the title of     |
| 25 |    | such analysis reports?                           |
|    |    | 110  |
|    |    |  |
| 1  |    | recollection.                                    |
| 2  | Q. | Service management team?                         |
| 3  | Α. | Yeah.  |
| 4  | Q. | Right, and a particular name of an individual    |
| 5  |    | you would recall at any given time?              |
| 6  | Α. | At any given time, somebody like Dave Hulbert    |
| 7  |    | would have been heading up that team. That's     |
| 8  |    | where I believe the monthly service management   |
| 9  |    | reviews were managed.                            |
| 10 | Q. | There's a term used, which is used within your   |
| 11 |    | statement and referred to in a document that you |
| 12 |    | were taken to today by Mr Blake, which is        |
| 13 |    | a cross-domain problem.                          |
|    |    |  |

- 14 A. Yes.
- 15 **Q.** Is that a term of art within the Post Office to
- 16 describe a type of document or report or system
- 17 where there is a problem that is known to both
- 18 Fujitsu and the Post Office?
- 19 A. It's terminology to describe any problem that
- 20 requires interaction with a third-party
- 21 supplier, ie it's not just within Post Office's22 gift to resolve.
- 23 Q. Right. Is there any sort of risk analysis
- 24 system that has been developed to decide when
- such a thing does reach the stage of it being

| 1        |            | a cross-domain problem? Is there a trigger for  |
|----------|------------|---|
| 2        |            | this to say "Look, this is cross-domain"?   |
| 3        | Α.         | There were problem management documents around  |
| 4        |            | prioritisation, and so forth, in terms of   |
| 5        |            | issues.   |
| 6        | Q.         | 5   |
| 7        |            | documents around that considered risk analysis  |
| 8        |            | in the way that traditionally regulators often  |
| 9        |            | do, thinking about either use of a traffic light  |
| 10       |            | system, like green or amber or red, to analyse  |
| 11       |            | risk?   |
| 12       | Α.         | •   |
| 13       |            | remember conversations with problem managers  |
| 14       |            | about rating problems based on the number of  |
| 15       | ~          | branches impacted, and so forth.  |
| 16       | Q.         |   |
| 17       |            | asked a number of questions by Mr Blake   |
| 18       |            | regarding the receipts/payments mismatch issue.   |
| 19<br>20 | A.         |   |
| 20<br>21 | Q.         |   |
| 21       |            | Office Fujitsu document, that discussed that.<br>That's the "Receipts/Payments Mismatch Issue". |
| 22       |            | He referred to that at around the period of time  |
| 23       |            | which is 2010 and ongoing.  |
| 25       |            | One thing that is unclear from your evidence  |
| 20       |            | 113   |
|          |            |   |
|          |            |   |
| 1        |            | somebody dropped me a note, saying, "Can you  |
| 2        |            | look at this?" I hope if it was, we'd be able   |
| 3        |            | to find documentary evidence of that but it may   |
| 4<br>5   | ^          | very well have been a phone call.   |
| 6        | Q.         | Yes, and if I ask whether you recall being<br>briefed, in other words being given a written     |
| 7        |            | document "Mr Turner, this is something you need   |
| 8        |            | to be aware of, this is the issue, we want you  |
| 9        |            | to do X action", do you recall getting anything   |
| 9<br>10  |            | like that?  |
| 11       | Α.         | I'm sorry, I don't.   |
| 12       | Q.         |   |
| 13       | <u>~</u> . | a document, who would that which team would   |
| 14       |            | have given you that kind of heads-up or that  |
| 15       |            | information?  |
| 16       | Α.         | Well, I think considering that the action listed  |
| 17       |            | was against Julia Marwood, who was an attendee  |
| 18       |            | of that meeting, I would imagine that any   |
| 19       |            | interactions that I had had, and if there was   |
| 20       |            | an email trail, I imagine that would be from  |
| 21       |            | Julia to me.  |
| 22       | Q.         | Yes, because she's listed as being the owner of   |
| 23       |            | that particular issue, under her initials "JM"?   |
| 24       | Α.         | That's right.   |
| 25       | Q.         | Yes. Excuse me one moment.  |
|          |            | 115   |
|          |            |   |

| 4  |     |  |
|----|-----|--|
| 1  |     | so far is what were you actually told about that   |
| 2  |     | issue, the receipts/payments mismatch issue,       |
| 3  |     | around about that time? What were you told         |
| 4  |     | about it?  |
| 5  | Α.  | I don't remember. I remember being told that       |
| 6  |     | there was an issue, having seen the document       |
| 7  |     | last week. But I don't remember exactly what       |
| 8  |     | I was told, whether the nature of that             |
| 9  |     | conversation was just as per the action point      |
| 10 |     | out of that meeting, can you check whether this    |
| 11 |     | would cause an issue with the profile that         |
| 12 |     | I managed at that time, the branch profile? But    |
| 13 |     | I'm sorry, I don't remember what I was told.       |
| 14 | Q.  | I am grateful, Mr Turner because your evidence     |
| 15 |     | was clearly hesitating you were hesitating in      |
| 16 |     | your evidence at the time regarding this and so    |
| 17 |     | it led to these questions, which is: what access   |
| 18 |     | did you actual have to this information?           |
| 19 |     | You refer to that as a conversation. Was it        |
| 20 |     | actually a discussion, an oral discussion or was   |
| 21 |     | this is an email discussion or some other means    |
| 22 |     | of discussing it?                                  |
| 23 | Α.  | As I say, I don't remember and, using sort of      |
| 24 |     | "conversation" in a more informal context,         |
| 25 |     | I don't remember whether it would have been<br>114 |
|    |     | 114  |
|    |     |  |
| 1  | Α.  | Sure.  |
| 2  | MR  | STEIN: Sir, I'm grateful, thank you.               |
| 3  | SIR | WYN WILLIAMS: Thank you.                           |
| 4  |     | Ms Page, I think, has a question.                  |
| 5  |     | Questioned by MS PAGE                              |
| 6  | MS  | PAGE: Thank you, sir.                              |
| 7  |     | In your witness statement, Mr Turner, you          |
| 8  |     | note that because of a baseline faith in Horizon   |
| 9  |     | as a robust system, POL was perhaps not as         |
| 10 |     | attuned to concerns raised by SPMs as it should    |
| 11 |     | have been?   |
| 12 | Α.  | Yes.   |

| 12 | ς. | 163.   |
|----|----|--|
| 13 | Q. | Can I just ask you about that when you were in |

14 your role when the Callendar Square bug was

15 brought to your attention. I don't know if

- 16 you're particularly aware of this, but in
- 17 Scotland it was a rather different prosecutorial
- 18 process and Post Office were not allowed to
- bring their own prosecutions; were you aware ofthat?
- 21 A. I was not no.
- 22 Q. Well, what we've obviously got here is
- 23 a Scottish problem with a Sandra MacKay picking
- 24 up the issue in Callendar Square in Falkirk. It
- 25 was first noticed then in Scotland.

| 1  | Α.  | Yes.   |
|----|-----|--|
| 2  | Q.  | Does that make sense?                            |
| 3  | Α.  | It does.   |
| 4  | Q.  | Did you ever receive what I'm interested in      |
| 5  |     | is the possibility that people in Scotland were  |
| 6  |     | more attuned to the problems that subpostmasters |
| 7  |     | faced because their experience of having to deal |
| 8  |     | with third-party prosecutors may have made them  |
| 9  |     | more attuned, if that makes sense?               |
| 10 | Α.  | I never received or had a conversation to        |
| 11 |     | suggest that, no.                                |
| 12 | Q.  | Did you ever receive any problems like the       |
| 13 |     | Callendar Square bug type problem, or indeed     |
| 14 |     | problems generally? Did they ever come across    |
| 15 |     | your desk from area managers working in England  |
| 16 |     | and Wales?                                       |
| 17 | Α.  | I don't recall any specific instances but        |
| 18 |     | I would expect, yes, there were cases from       |
| 19 |     | England and Wales. My role in terms of that      |
| 20 |     | escalation role covered the entire country, so   |
| 21 |     | it could come from any area of the country.      |
| 22 | Q.  | You described earlier in your evidence that the  |
| 23 |     | Callendar Square problem was perhaps somewhat    |
| 24 |     | unique. What was the qualities of it that made   |
| 25 |     | it unique?<br>117                                |
|    |     | 117  |
|    |     |  |
| 1  |     | a significant problem in this way, in the way    |
| 2  |     | that the Callendar Square bug did?               |
| 3  | Α.  | No.  |
| 4  | MS  | <b>PAGE:</b> Thank you. Those are my questions.  |
| 5  | SIR | WYN WILLIAMS: Thank you, Ms Page.                |
| 6  |     | Is that it, Mr Blake?                            |
| 7  | MR  | BLAKE: I believe that is, sir, yes, unless you,  |
| 8  |     | sir, have questions.                             |
| 9  | SIR | WYN WILLIAMS: No, thank you very much.           |
| 10 |     | Mr Turner, I'm very grateful to you for          |
| 11 |     | providing such a detailed witness statement in   |
| 12 |     | response to very many questions, and I am        |
| 13 |     | equally grateful that you've come before the     |
| 14 |     | Inquiry to give oral evidence. So thank you.     |
| 15 |     | EWITNESS: Thank you, sir.                        |
| 16 | SIR | WYN WILLIAMS: I should say that in view of the   |
| 17 |     | fact that, as you will have gathered, there      |
| 18 |     | appears to be a glitch in the disclosure         |
| 10 |     | process. It is not inconceivable that you will   |

- 19 process. It is not inconceivable that you will
- 20 be asked to return, but we will keep that under
- 21 review, all right?
- 22 THE WITNESS: Okay.
- 23 MR BLAKE: Sir, shall we say 1.50?
- 24 SIR WYN WILLIAMS: Yes, by all means Mr Blake, yes.
- 25 MR BLAKE: Thank you very much.

- 1 A. Unique in my experience, at least?
- 2 Q. Yes. 3 You know, I think it was -- in terms of my Α. 4 exposure, I'd not come across anything like that 5 previously. I think I said in my witness 6 statement that of the issues I dealt with during 7 my time as network co-ordination manager, 8 I didn't remember the details, but I still 9 remembered that I'd dealt with this particular 10 bug at Callendar Square. 11 Q. But do you not particularly have memories of 12 other bugs that you dealt with? 13 **A**. No. I remember other issues with Horizon and other parts of the business but this, to me, 14 15 would have been an unusual and anomalous kind of 16 case, at least in terms of my exposure to it. 17 Q. So in terms of your exposure, bugs of this 18 nature were not raised to you at all from 19 England and Wales? 20 Α. No, that's -- I'm not saying that I didn't have some issues raised, but I think -- I don't 21 22 remember whether there were issues raised from 23 England and Wales, but I would expect that there 24 would be. 25 Q. But they didn't stand out in your mind as 118 (12.50 pm) 1 2 (The Short Adjournment) 3 (1.50 pm) 4 MR STEVENS: Good afternoon, sir. Can you see and 5 hear me? 6 SIR WYN WILLIAMS: Thank you. 7 MR STEVENS: If I may call Mr Blackburn. GARY DAVID BLACKBURN (affirmed) 8 Questioned by MR STEVENS 9 MR STEVENS: Mr Blackburn, as you know, my name is 10 11 Sam Stevens and I ask questions on behalf of the 12 Inquiry. Please could I ask you to state your full name? 13 14 A. Gary David Blackburn. 15 Q. Firstly, thank you for giving evidence to the 16 Inquiry today and thank you for providing 17 a written statement to which I'd like to turn 18 now. Do you have a bundle of documents in front 19 of you? 20 A. I don't. 21 Q. You don't. Right. Bear with me, I'll see where 22 that is. 23 Apologies, sir. We will just wait while 24 that bundle arrives.
- 25 SIR WYN WILLIAMS: Sure. Yes.

| 2  |    | those bundles should have your witness statement |
|----|----|--|
| 3  |    | at the front of it, behind tab A.                |
| 4  | Α. | Yes, got that.                                   |
| 5  | Q. | Excellent, apologies for that and thank you. So  |
| 6  |    | that witness statement should run to 16 pages.   |
| 7  | Α. | Correct.   |
| 8  | Q. | If you turn to page 15, you'll see paragraph 28  |
| 9  |    | being the last paragraph, and at the bottom is   |
| 10 |    | that your signature?                             |
| 11 | Α. | It is.   |
| 12 | Q. | Can I ask you to confirm that the facts within   |
| 13 |    | that statement are true to the best of your      |
| 14 |    | knowledge and belief?                            |
| 15 | Α. | They are.  |
| 16 | Q. | Thank you, Mr Blackburn, that stands as your     |
| 17 |    | evidence in the Inquiry. I am going to ask you   |
| 18 |    | some questions about that. You joined the Post   |
| 19 |    | Office in 1985?                                  |
| 20 | Α. | Yes, I did.                                      |
| 21 | Q. | From 1985 to 1994 you worked, I understand, in   |
| 22 |    | Crown Office branches around Huddersfield?       |
| 23 | Α. | Correct.   |
| 24 | Q. | Then in 1994, you were posted to the northeast   |
| 25 |    | regional office?                                 |

MR STEVENS: Thank you, Mr Blackburn. Now, one of

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pre-NBSC desk and pre-automation desks, what 1 2 were the types of enquiries you would most often 3 receive? 4 Α. It was very transactional in nature it was 5 really supporting the branches in terms of "How 6 do I complete it", particularly a transaction 7 for a member of the public, interspersed with 8 accounting queries but, as we may well end up 9 discussing, nowhere near to the extent it was 10 post-automation. That was the old paper-based 11 cash account, which was relatively 12 straightforward and simple to follow. 13 We also supported the Retail Network 14 Managers at the time in any enquiries that they 15 may have had and we were also there as a bit of 16 an emergency point of contact for events such as 17 burglaries and robberies, that kind of thing. 18 Q. What did you think of the quality of the advice 19 and assistance that was able to provided by the 20 regional helpdesk in comparison to the national 21 one? 22 Α. Yeah, it was, in my personal opinion, better, 23 and purely based upon the fact that it was 24 staffed with people who had similar career 25 profiles to myself, so that all worked in the 123

| zon IT Inquiry 28 |    |  |
|-------------------|----|--|
| 1                 | А. | That's correct.                                      |
| 2                 | Q. | At that stage, you say in your evidence that you     |
| 3                 |    | worked on a relatively new helpdesk that was         |
| 4                 |    | created to support the region?                       |
| 5                 | Α. | That is also correct.                                |
| 6                 | Q. | At this point, the Post Office was split into        |
| 7                 |    | seven regions?                                       |
| 8                 | Α. | It was.  |
| 9                 | Q. | You say that, subsequently, those individual         |
| 10                |    | regional helplines merged in to become what we       |
| 11                |    | now know as the Network Business Support             |
| 12                |    | Centre   |
| 13                | Α. | That is correct.                                     |
| 14                | Q. | or the NBSC?   |
| 15                | Α. | The NBSC, yes.                                       |
| 16                | Q. | Do you remember when that was?                       |
| 17                | Α. | It coincided with the introduction of the            |
| 18                |    | Horizon solution, so prior to that, it was           |
| 19                |    | the northeast regional desk or the various           |
| 20                |    | regional desks were there pre-automation and         |
| 21                |    | then also for I think it was called the ECCO+        |
| 22                |    | system. So I'm fairly certain it was a part of       |
| 23                |    | a larger reorganisation of the Post Office and       |
| 24                |    | the introduction of Legacy Horizon.                  |
| 25                | Q. | Casting your mind back to when you worked on the 122 |
| 1                 |    | branch network, primarily in the directly            |
| 2                 |    | managed branches in the Crown Offices, but one       |
| 3                 |    | or two of my colleagues at the time had also         |
| 4                 |    | worked in the independent branches, so they had      |
| 5                 |    | got a wealth of experience of completing the         |
| 6                 |    | varied transactions that we had at the time in       |
| 7                 |    | the business.  |
| 8                 | Q. | So when you say in the regional helpdesk, you        |
| 9                 |    | pointed to the experience of the people within       |
| 10                |    | it as a strength.                                    |
| 11                | Α. | Yes.   |
| 12                | Q. | Can you explain why that was different from the      |
| 13                |    | NBSC?  |
|                   |    |  |

- Well, when -- so the regional helpline converted 14 **A**.
- 15 into the Horizon trial desk. So I was part of
- 16 the trial desk then, which was run out of
- 17 an office in Leeds. I think the branches in the
- 18 trial were from both the Leeds and Bristol
- 19 regions, I want to say. It was still very much
- 20 the same group of people, albeit everything was
- 21 new to all of us at that time, in terms of
- 22 Horizon itself. But the business knowledge was
- 23 still the same, the transactions were still the
- 24 same, although completed in a different manner.
- 25 As we moved then into what was the

| 1  |                            | national the Network Business Support Centre   |
|--|----------------------------|--|
| 2  |                            | and the national the only helpdesk for   |
| 3  |                            | business enquiries, naturally we had to expand   |
| 4  |                            | and recruit more people. We moved from Leeds to  |
| 5  |                            | a greenfield site in the Dearne Valley, it was   |
| 6  |                            | fairly isolated at the time. There was one or  |
| 7  |                            | two other contact centres in the environment, so   |
| 8  |                            | we picked up new recruits from the surrounding   |
| 9  |                            | area, people, in effect, who had it was their  |
| 10   |                            | first experience of working for the Post Office,   |
| 11   |                            | they'd no prior experience.  |
| 12   |                            | So, for me, naturally, there was just  |
| 13   |                            | a slight diluting of the quality of the  |
| 14   |                            | individual on the desk, as they obviously that   |
| 15   |                            | to go through a steep learning curve themselves.   |
| 16   | Q.                         | Is it fair to say there was a lot of   |
| 17   |                            | institutional knowledge when moving to the NBSC?   |
| 18   | Α.                         | That is my opinion, yes.   |
| 19   | Q.                         | For that reason, is it fair to say that, because   |
| 20   |                            | of that loss of institutional knowledge, it was  |
| 21   |                            | important to ensure that the new members of the  |
| 22   |                            | NBSC were adequately trained?  |
| 23   | Α.                         | Yes, vital. Yes.   |
| 24   | Q.                         | We'll come on to training shortly. Before I do,  |
| 25   | ч.                         | the pre-NBSC regional helplines, I appreciate  |
| 20   |                            | 125  |
|  |                            |  |
|  |                            |  |
|  |                            |  |
| 1  |                            | calls that they were struggling to answer.   |
| 1<br>2   | Q.                         | calls that they were struggling to answer.<br>When did you finish that role as a team leader?  |
|  | Q.<br>A.                   |  |
| 2  |                            | When did you finish that role as a team leader?  |
| 2<br>3   |                            | When did you finish that role as a team leader?<br>I think now this is where chronology becomes  |
| 2<br>3<br>4  |                            | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm  |
| 2<br>3<br>4<br>5   |                            | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and  |
| 2<br>3<br>4<br>5<br>6  |                            | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and<br>I went down what was downstairs into business   |
| 2<br>3<br>4<br>5<br>6<br>7   |                            | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and<br>I went down what was downstairs into business<br>service management, as it was called at the  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | Α.                         | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and<br>I went down what was downstairs into business<br>service management, as it was called at the<br>time, and I   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | Α.                         | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and<br>I went down what was downstairs into business<br>service management, as it was called at the<br>time, and I<br>Pausing there, could you say what business<br>service management's role was?   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | A.<br>Q.                   | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and<br>I went down what was downstairs into business<br>service management, as it was called at the<br>time, and I<br>Pausing there, could you say what business   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11   | A.<br>Q.                   | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and<br>I went down what was downstairs into business<br>service management, as it was called at the<br>time, and I<br>Pausing there, could you say what business<br>service management's role was?<br>It's what I today would refer to as IT support,<br>some vital processes, change management, problem  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13   | A.<br>Q.                   | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and<br>I went down what was downstairs into business<br>service management, as it was called at the<br>time, and I<br>Pausing there, could you say what business<br>service management's role was?<br>It's what I today would refer to as IT support,<br>some vital processes, change management, problem<br>management, secondary layers of incident  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14   | А.<br>Q.<br>А.             | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and<br>I went down what was downstairs into business<br>service management, as it was called at the<br>time, and I<br>Pausing there, could you say what business<br>service management's role was?<br>It's what I today would refer to as IT support,<br>some vital processes, change management, problem<br>management, secondary layers of incident<br>management. Things like that.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   | A.<br>Q.<br>A.<br>Q.       | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and<br>I went down what was downstairs into business<br>service management, as it was called at the<br>time, and I<br>Pausing there, could you say what business<br>service management's role was?<br>It's what I today would refer to as IT support,<br>some vital processes, change management, problem<br>management, secondary layers of incident<br>management. Things like that.<br>What was your first role?  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16   | А.<br>Q.<br>А.             | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and<br>I went down what was downstairs into business<br>service management, as it was called at the<br>time, and I<br>Pausing there, could you say what business<br>service management's role was?<br>It's what I today would refer to as IT support,<br>some vital processes, change management, problem<br>management. Things like that.<br>What was your first role?<br>I started as a problem manager when I first went  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17   | A.<br>Q.<br>A.<br>Q.<br>A. | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and<br>I went down what was downstairs into business<br>service management, as it was called at the<br>time, and I<br>Pausing there, could you say what business<br>service management's role was?<br>It's what I today would refer to as IT support,<br>some vital processes, change management, problem<br>management. Things like that.<br>What was your first role?<br>I started as a problem manager when I first went<br>down there.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | A.<br>Q.<br>A.<br>Q.<br>A. | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and<br>I went down what was downstairs into business<br>service management, as it was called at the<br>time, and I<br>Pausing there, could you say what business<br>service management's role was?<br>It's what I today would refer to as IT support,<br>some vital processes, change management, problem<br>management, secondary layers of incident<br>management. Things like that.<br>What was your first role?<br>I started as a problem manager when I first went<br>down there.<br>For how long did you hold that role?   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               | A.<br>Q.<br>A.<br>Q.<br>A. | <ul> <li>When did you finish that role as a team leader?</li> <li>I think now this is where chronology becomes</li> <li>quite hazy for me but I think it was I'm</li> <li>going to say around about 2001/2, I think, and</li> <li>I went down what was downstairs into business</li> <li>service management, as it was called at the</li> <li>time, and I</li> <li>Pausing there, could you say what business</li> <li>service management's role was?</li> <li>It's what I today would refer to as IT support,</li> <li>some vital processes, change management, problem</li> <li>management. Things like that.</li> <li>What was your first role?</li> <li>I started as a problem manager when I first went</li> <li>down there.</li> <li>For how long did you hold that role?</li> <li>Now, that's the bit I really can't recall. From</li> </ul>  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | A.<br>Q.<br>A.<br>Q.<br>A. | <ul> <li>When did you finish that role as a team leader?</li> <li>I think now this is where chronology becomes</li> <li>quite hazy for me but I think it was I'm</li> <li>going to say around about 2001/2, I think, and</li> <li>I went down what was downstairs into business</li> <li>service management, as it was called at the</li> <li>time, and I</li> <li>Pausing there, could you say what business</li> <li>service management's role was?</li> <li>It's what I today would refer to as IT support,</li> <li>some vital processes, change management, problem</li> <li>management. Things like that.</li> <li>What was your first role?</li> <li>I started as a problem manager when I first went</li> <li>down there.</li> <li>For how long did you hold that role?</li> <li>Now, that's the bit I really can't recall. From</li> <li>memory, even looking through all of the</li> </ul>   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | A.<br>Q.<br>A.<br>Q.<br>A. | When did you finish that role as a team leader?<br>I think now this is where chronology becomes<br>quite hazy for me but I think it was I'm<br>going to say around about 2001/2, I think, and<br>I went down what was downstairs into business<br>service management, as it was called at the<br>time, and I<br>Pausing there, could you say what business<br>service management's role was?<br>It's what I today would refer to as IT support,<br>some vital processes, change management, problem<br>management. Secondary layers of incident<br>management. Things like that.<br>What was your first role?<br>I started as a problem manager when I first went<br>down there.<br>For how long did you hold that role?<br>Now, that's the bit I really can't recall. From<br>memory, even looking through all of the<br>documentation, I really have very little   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | A.<br>Q.<br>A.<br>Q.<br>A. | <ul> <li>When did you finish that role as a team leader?</li> <li>I think now this is where chronology becomes</li> <li>quite hazy for me but I think it was I'm</li> <li>going to say around about 2001/2, I think, and</li> <li>I went down what was downstairs into business</li> <li>service management, as it was called at the</li> <li>time, and I</li> <li>Pausing there, could you say what business</li> <li>service management's role was?</li> <li>It's what I today would refer to as IT support,</li> <li>some vital processes, change management, problem</li> <li>management. Things like that.</li> <li>What was your first role?</li> <li>I started as a problem manager when I first went</li> <li>down there.</li> <li>For how long did you hold that role?</li> <li>Now, that's the bit I really can't recall. From</li> <li>memory, even looking through all of the</li> <li>documentation, I really have very little</li> <li>recollection of my time in that team. I don't</li> </ul>  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A.<br>Q.<br>A.<br>Q.<br>A. | <ul> <li>When did you finish that role as a team leader?</li> <li>I think now this is where chronology becomes</li> <li>quite hazy for me but I think it was I'm</li> <li>going to say around about 2001/2, I think, and</li> <li>I went down what was downstairs into business</li> <li>service management, as it was called at the</li> <li>time, and I</li> <li>Pausing there, could you say what business</li> <li>service management's role was?</li> <li>It's what I today would refer to as IT support,</li> <li>some vital processes, change management, problem</li> <li>management. Things like that.</li> <li>What was your first role?</li> <li>I started as a problem manager when I first went</li> <li>down there.</li> <li>For how long did you hold that role?</li> <li>Now, that's the bit I really can't recall. From</li> <li>memory, even looking through all of the</li> <li>documentation, I really have very little</li> <li>recollection of my time in that team. I don't</li> <li>think it was for very long, because I seemed to</li> </ul>   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | A.<br>Q.<br>A.<br>Q.<br>A. | <ul> <li>When did you finish that role as a team leader?</li> <li>I think now this is where chronology becomes</li> <li>quite hazy for me but I think it was I'm</li> <li>going to say around about 2001/2, I think, and</li> <li>I went down what was downstairs into business</li> <li>service management, as it was called at the</li> <li>time, and I</li> <li>Pausing there, could you say what business</li> <li>service management's role was?</li> <li>It's what I today would refer to as IT support,</li> <li>some vital processes, change management, problem</li> <li>management. Things like that.</li> <li>What was your first role?</li> <li>I started as a problem manager when I first went</li> <li>down there.</li> <li>For how long did you hold that role?</li> <li>Now, that's the bit I really can't recall. From</li> <li>memory, even looking through all of the</li> <li>documentation, I really have very little</li> <li>recollection of my time in that team. I don't</li> <li>think it was for very long, because I seemed to</li> <li>move on quite quickly into other incident facing</li> </ul> |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A.<br>Q.<br>A.<br>Q.<br>A. | <ul> <li>When did you finish that role as a team leader?</li> <li>I think now this is where chronology becomes</li> <li>quite hazy for me but I think it was I'm</li> <li>going to say around about 2001/2, I think, and</li> <li>I went down what was downstairs into business</li> <li>service management, as it was called at the</li> <li>time, and I</li> <li>Pausing there, could you say what business</li> <li>service management's role was?</li> <li>It's what I today would refer to as IT support,</li> <li>some vital processes, change management, problem</li> <li>management. Things like that.</li> <li>What was your first role?</li> <li>I started as a problem manager when I first went</li> <li>down there.</li> <li>For how long did you hold that role?</li> <li>Now, that's the bit I really can't recall. From</li> <li>memory, even looking through all of the</li> <li>documentation, I really have very little</li> <li>recollection of my time in that team. I don't</li> <li>think it was for very long, because I seemed to</li> </ul>   |

| 1   |          | you can only speak for the northeast, but did   |
|---|----------|---|
| 2   |          | they ever have any communication, the helpline  |
| 3   |          | as such, with people involved in bringing   |
| 4   |          | prosecutions against subpostmasters for false   |
| 5   |          | accounting or theft?  |
| 6   | Α.       | No, not at that time, no. It wasn't part of the   |
| 7   |          | remit.  |
| 8   | Q.       | The same question, but in respect of auditors:  |
| 9   |          | was there any communication between the regional  |
| 10  |          | helpline and the audit teams?   |
| 11  | Α.       | I can't remember, if I'm honest. There may well   |
| 12  |          | have been, because regional auditing was a very,  |
| 13  |          | you know, business as usual part of everyday  |
| 14  |          | Post Office life. So there may have been. But   |
| 15  | _        | it's not something I recollect.   |
| 16  | Q.       | So in paragraph 4 of your statement, which we   |
| 17  |          | don't need to turn to, you say that you were  |
| 18  |          | a team leader on the NBSC. Could you just   |
| 19  |          | summarise, briefly, what that role entailed?  |
| 20  | Α.       | It was line management of a group of individuals  |
| 21  |          | who would be actually manning the telephones and  |
| 22  |          | taking the calls from the branches. When we had   |
| 23  |          | busy times, I would also take calls from the  |
| 24  |          | branches but it was providing a layer of people   |
| 25  |          | management and support and guidance for any<br>126  |
|   |          | 120   |
|   |          |   |
| 1   |          | l couldn't tell you.  |
| 2   | Q.       | We'll come to those roles in a moment. In brief   |
| 3   |          | terms, could you summarise what your role as  |
| 4   |          | a problem manager was?  |
| 5   | Α.       | Yeah, and I think, as I've said in my statement,  |
|   |          |   |
| 6   |          | it felt, looking back with hindsight, reactive  |
| 6<br>7  |          |   |
|   |          | it felt, looking back with hindsight, reactive<br>rather than sort of proactive, in the sense that<br>we would literally take trends and analysis from  |
| 7   |          | it felt, looking back with hindsight, reactive rather than sort of proactive, in the sense that   |
| 7<br>8  |          | it felt, looking back with hindsight, reactive<br>rather than sort of proactive, in the sense that<br>we would literally take trends and analysis from<br>the Network Business Support Centre, we'd also<br>have it provided to us by the Horizon System  |
| 7<br>8<br>9   |          | it felt, looking back with hindsight, reactive<br>rather than sort of proactive, in the sense that<br>we would literally take trends and analysis from<br>the Network Business Support Centre, we'd also<br>have it provided to us by the Horizon System<br>Helpdesk and we would look for where there was  |
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| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14   |          | it felt, looking back with hindsight, reactive<br>rather than sort of proactive, in the sense that<br>we would literally take trends and analysis from<br>the Network Business Support Centre, we'd also<br>have it provided to us by the Horizon System<br>Helpdesk and we would look for where there was<br>any remediation activities that might be<br>required to prevent future occurrences of<br>whatever the incidents had been.   |
| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   | Q.       | it felt, looking back with hindsight, reactive<br>rather than sort of proactive, in the sense that<br>we would literally take trends and analysis from<br>the Network Business Support Centre, we'd also<br>have it provided to us by the Horizon System<br>Helpdesk and we would look for where there was<br>any remediation activities that might be<br>required to prevent future occurrences of<br>whatever the incidents had been.<br>Your role after problem we don't know the  |
| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16   | Q.       | it felt, looking back with hindsight, reactive<br>rather than sort of proactive, in the sense that<br>we would literally take trends and analysis from<br>the Network Business Support Centre, we'd also<br>have it provided to us by the Horizon System<br>Helpdesk and we would look for where there was<br>any remediation activities that might be<br>required to prevent future occurrences of<br>whatever the incidents had been.<br>Your role after problem we don't know the<br>date, specifically, but what was your role after  |
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| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | -        | it felt, looking back with hindsight, reactive<br>rather than sort of proactive, in the sense that<br>we would literally take trends and analysis from<br>the Network Business Support Centre, we'd also<br>have it provided to us by the Horizon System<br>Helpdesk and we would look for where there was<br>any remediation activities that might be<br>required to prevent future occurrences of<br>whatever the incidents had been.<br>Your role after problem we don't know the<br>date, specifically, but what was your role after<br>that of a problem manager?<br>So I this is where my career, I do apologise,<br>becomes quite hazy, because I did so many roles<br>including interspersed with taking parts in<br>various programmes from a support perspective.   |
| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | -        | it felt, looking back with hindsight, reactive<br>rather than sort of proactive, in the sense that<br>we would literally take trends and analysis from<br>the Network Business Support Centre, we'd also<br>have it provided to us by the Horizon System<br>Helpdesk and we would look for where there was<br>any remediation activities that might be<br>required to prevent future occurrences of<br>whatever the incidents had been.<br>Your role after problem we don't know the<br>date, specifically, but what was your role after<br>that of a problem manager?<br>So I this is where my career, I do apologise,<br>becomes quite hazy, because I did so many roles<br>including interspersed with taking parts in<br>various programmes from a support perspective.<br>My next recollection was a live service desk   |
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| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | -        | it felt, looking back with hindsight, reactive<br>rather than sort of proactive, in the sense that<br>we would literally take trends and analysis from<br>the Network Business Support Centre, we'd also<br>have it provided to us by the Horizon System<br>Helpdesk and we would look for where there was<br>any remediation activities that might be<br>required to prevent future occurrences of<br>whatever the incidents had been.<br>Your role after problem we don't know the<br>date, specifically, but what was your role after<br>that of a problem manager?<br>So I this is where my career, I do apologise,<br>becomes quite hazy, because I did so many roles<br>including interspersed with taking parts in<br>various programmes from a support perspective.<br>My next recollection was a live service desk<br>recall, that's the key role that I remember,   |

| 1  | Q. | We'll come to that again in due course but, just |
|----|----|--|
| 2  |    | for chronology purposes, you were transferred    |
| 3  |    | understanding TUPE to ATOS in 2014?              |
| 4  | Α. | That's correct.                                  |
| 5  | Q. | Could you just explain what ATOS was doing at    |
| 6  |    | that stage for you to be TUPE transferred        |
| 7  |    | across?  |
| 8  | Α. | Yes, so ATOS in for me, in simple terms, it      |
| 9  |    | was Post Office outsourcing that what I'd        |
| 10 |    | just described as the business service           |
| 11 |    | management functionality and it was implementing |
| 12 |    | a new operating model for management of Post     |
| 13 |    | Office's IT supply chain.                        |
| 14 | Q. | I understand you left that role in 2017          |
| 15 | Α. | I did, yes.                                      |
| 16 | Q. | and you no longer work for the Post Office?      |
| 17 | Α. | That's correct.                                  |
| 18 | Q. | Could we, please, turn up your witness statement |
| 19 |    | on the screen. It's WITN04650100, and            |
| 20 |    | paragraph 10, please, on page 6. Thank you.      |
| 21 |    | You state that:                                  |
| 22 |    | "The purpose of the NBSC was to support the      |
| 23 |    | branch network through answering 'how do I'      |
| 24 |    | related transactional questions alongside the    |
| 25 |    | Fujitsu Horizon Service Desk which was there     |
|    |    | 129  |
|    |    |  |
| 1  |    | team leader?                                     |
| 2  | Α. | I think the only training that I remember was    |
| 3  |    | training on the Horizon solution. So there was   |
| 4  |    | no additional business training or anything like |
| 5  |    | that. It was a standard counter training         |
| 6  |    | course, as it was at that time, which included   |
| 7  |    | use of the Horizon System.                       |
| 8  | Q. | Do you recall what that training involved?       |
| 9  | Α. | l'm sorry, l don't.                              |
| 10 | Q. | What about the new candidates, the people who    |
| 11 |    | hadn't the institutional knowledge that you had? |
| 12 |    | Did they receive the same training or different? |
| 13 | Α. | Number 1, I believe, you know, they received     |
|    |    |  |

- 14 that element of training because the Horizon
   15 System was now ultra-important but they also
- System was now ultra-important but they also
   received what I would call the standard Post
- 17 Office training, as if they were going to work
- 18 in a directly managed branch, for example.
- 19 **Q.** Do you recall if there was ever updater or
- 20 refresher training given to members of the NBSC21 on how to use the Horizon System?
- 22 **A.** Not specifically, no, I don't.
- 23 **Q.** I'd like now to turn to the relationship between
- 24 the NBSC and the Fujitsu helpdesk, which you've
- 25 mentioned in your statement. Please can we turn 131

| 1  |    | to support the branch network with technical     |
|----|----|--|
| 2  |    | questions and queries in relation to the         |
| 3  |    | technology (Hardware, Software and Network) that |
| 4  |    | had been provided."                              |
| 5  |    | What do you mean by "How do I'                   |
| 6  |    | transactional questions"?                        |
| 7  | Α. | I mean literally a member of the public, being   |
| 8  |    | in the branch, wanting to conduct a particular   |
| 9  |    | transaction type and the branch not being quite  |
| 10 |    | sure how to do that. At the time of Horizon,     |
| 11 |    | that also involved, you know, what were more     |
| 12 |    | complex navigational type questions through the  |
| 13 |    | solution. So that was that is what I would       |
| 14 |    | refer to as "How do I complete this transaction  |
| 15 |    | for, you know, an item going overseas" or        |
| 16 |    | something to that effect. That was the type of   |
| 17 |    | things we did.                                   |
| 18 | Q. | That document can come down for the time being.  |
| 19 |    | Thank you.                                       |
| 20 |    | I think you've mentioned already a large         |
| 21 |    | part of the NBSC's role was to assist with       |
| 22 |    | balancing as well.                               |
| 23 | Α. | Very much so, yes. Yes.                          |
| 24 | Q. | What training did you receive on joining the     |
| 25 |    | NBSC to enable you to carry out your role as     |
|    |    | 130  |
|    |    |  |
| 1  |    | up FUJ00080405.                                  |
| 2  |    | This is the "ICL Pathway/Post Office Counter     |
| 3  |    | Limited Interface Agreement for the Network      |
| 4  |    | Business Support Centre and the Horizon System   |
| 5  |    | Helpdesk". If we could turn to page 4, please,   |
| 6  |    | towards the bottom. Under "Contributors" we can  |
| 7  |    | see that you the name on the right towards       |
| 8  |    | the bottom, you contributed towards this         |
| 9  |    | document?  |
| 10 | ۸  | Veah   |

10 A. Yeah.

- 11 Q. Do you recall the level of input you had on it?
  12 A. I don't but I would assume, given my role at the time, it was one really, you know, coming from
- 14 a point of managing a team of people who might
- 15 possibly have to interact with the Horizon
- 16 Service Desk or exchange ownership of
- 17 an incident that had been logged.
- 18 Q. Please can we turn to page 7 of that document.
- 19 So section 5 sets out general responsibilities,
- 20 and under (h) it says -- I'll summarise -- Post
- 21 Office Counters Limited and ICL Pathway:
- 22 "... are responsible for ensuring that known
- 23 problems or events, that may impact on the
- 24 everyday business of NBSC and HSH, are made
  - known to both helpdesks."

| 1  |    | Can you recall how the bodies, the NBSC and      |
|----|----|--|
| 2  |    | the Horizon Service Helpdesk, communicated with  |
| 3  |    | each other regarding problems with the Horizon   |
| 4  |    | System.  |
| 5  | Α. | At that time, when we were talking of Legacy     |
| 6  |    | Horizon, as opposed to HNG-X, the two desks were |
| 7  |    | very distinct, in fact the responsibility, in    |
| 8  |    | effect, had been passed to the branch network to |
| 9  |    | determine which number they rang and, therefore, |
| 10 |    | who they spoke to. So I do remember there being  |
| 11 |    | a lot of interaction between the two desks in    |
| 12 |    | terms of swapping ownership. We also had the     |
| 13 |    | NBSC had an admin team that, if there was        |
| 14 |    | a wider sort of unplanned event that was         |
| 15 |    | impacting either desk or a large volume of calls |
| 16 |    | suddenly started coming into the desk, they      |
| 17 |    | would take the responsibility for the interface  |
| 18 |    | and the communication.                           |
| 19 |    | I don't really remember anything further,        |
| 20 |    | I'm afraid.                                      |
| 21 | Q. | Well, it may help assist your memory if we look  |
| 22 |    | at page 16. Section 9 describes daily            |
| 23 |    | interactions, which I don't need to trouble you  |
| 24 |    | with but, if we can go to 10 the "NBSC/HSH       |
| 25 |    | Review Forum" says:                              |
|    |    | 133  |
|    |    |  |
| 1  |    | service management function, a second level of   |
| 2  |    | incident management and problem management, for  |
| 3  |    | them to investigate and determine whether or not |
| 4  |    | there was something deeper that needed Fujitsu   |
| 5  |    | support and investigation.                       |
| 6  |    | It was very contact centre focused, was the      |
| 7  |    | NBSC/HSH and the reviews.                        |
| 8  | Q. | So when you said it would if there was           |
| 9  |    | a problem you feared problem with the system,    |
| 10 |    | it would be passed to a different team. Would    |
| 11 |    | that be the Problem Management Team?             |
| 12 | Α. | It would have been and if it would have gone in  |
| 13 |    | a much more timely manner. It would have gone    |
| 14 |    | at the time that the event occurred rather than, |
| 15 |    | you know, post-monthly review.                   |
| 16 | Q. | Your evidence is, to the best of your            |
| 17 |    | recollection, this review forum mainly concerned |
| 18 |    | maybe operational contact centre elements of     |
| 19 |    | types  |
|    |    |  |

- 20 A. Volume of calls, types of calls, absolutely, to
- 21 see whether there was a need to produce
- 22 knowledge articles for the advisers in the NBSC,
- 23 or perhaps even suggest that there may be
- 24 reminders that need to go in the Counter News 25
  - article out to the wider network but not really
    - 135

| 1  |    | "The performance of work undertaken across       |
|----|----|--|
| 2  |    | the NBSC/HSH interface will be the subject of    |
| 3  |    | monthly review. The output of the review forum   |
| 4  |    | will provide input to:                           |
| 5  |    | "The Horizon Service Review Forum."              |
| 6  | Α. | Right.   |
| 7  | Q. | Were you involved or do you recall being         |
| 8  |    | involved in these monthly reviews?               |
| 9  | Α. | I don't but, given my role, I would be very      |
| 10 |    | likely to have been involved in at least some of |
| 11 |    | them, yeah.                                      |
| 12 | Q. | I'll ask the question but I can see the answer:  |
| 13 |    | you don't recall the types of matters which      |
| 14 |    | would have been discussed in these meetings?     |
| 15 | Α. | It would have been primarily contact centre      |
| 16 |    | focused, I would imagine. But it wasn't really   |
| 17 |    | the as I recall, it wasn't really the forum      |
| 18 |    | for raising of concern around, let's say, the    |
| 19 |    | performance of the solution. If we'd have had    |
| 20 |    | an incident that we couldn't answer with the     |
| 21 |    | information that we had and the knowledge that   |
| 22 |    | we had on the desk and we felt it was the        |
| 23 |    | system, let me say, not working in the way we    |
| 24 |    | had understood it should work, we'd have passed  |
| 25 |    | that, at the time, down into the business        |
|    |    | 134  |
|    |    |  |

| 1  |    | focused at all on the technology.               |
|----|----|---|
| 2  | Q. | Another purpose of this document was to         |
| 3  |    | delineate the role, which calls would go to the |
| 4  |    | NBSC and which to the Horizon or the HSH, later |
| 5  |    | HSD. Can we turn to page 18, please, which      |
| 6  |    | should be an appendix. Yes, that's right, it's  |
| 7  |    | not formally an appendix but this is the table  |
| 8  |    | I was looking at. We see here, on the left      |
| 9  |    | column "Postmaster Incident", and the first two |
| 10 |    | are "[unable] to log on" and, if it was because |
| 11 |    | of a system failure or user error the Horizon   |
| 12 |    | Service Helpdesk would deal with it but, if it  |
| 13 |    | was a lost password, we see the third line, it  |
| 14 |    | was the NBSC. So this was separating those      |
| 15 |    | roles.  |
| 16 |    | The last entry "Cannot use the Horizon          |
| 17 |    | counter system or part of the system" refers to |
| 18 |    | matters such as sorry, we'll just wait for      |
| 19 |    | that to come back on screen. Thank you.         |
| 20 |    | The last entry, here we're talking about        |
| 21 |    | monitor failure or equipment failure, which     |
| 22 |    | results in the subpostmaster not being able to  |
| 23 |    | use the system and that's clearly a helpdesk    |
| 24 |    | issue, a Fujitsu issue.                         |
| 25 | Α. | Yes.  |

| 1        | Q. | Can we turn to page 20, please. The bottom two               |
|----------|----|--|
| 2        |    | entries, one says, "Has an EPOSS discrepancy"                |
| 3        |    | and the next is a weekly one. That's referring               |
| 4        |    | to an issue in the cash account when balancing,              |
| 5        |    | isn't it?  |
| 6        | Α. | Yes.   |
| 7        | Q. | In both cases, it says the first contact is the              |
| 8        |    | Fujitsu helpdesk, and the comment says:                      |
| 9        |    | "HSH are responsible for assisting the PM in                 |
| 10       |    | the correction of the discrepancy. However, if               |
| 11       |    | HSH cannot resolve an EPOSS discrepancy the PM               |
| 12       |    | will be referred to NBSC for approval to accept              |
| 13       |    | the discrepancy."  |
| 14       |    | In both situations, the sole cause is listed                 |
| 15       |    | as "user error". Can you explain why this                    |
| 16       |    | document doesn't refer to what to do if there's              |
| 17       |    | an EPOSS discrepancy caused by the Horizon IT                |
| 18       |    | System?  |
| 19       | Α. | No, I can't. All I can say at the time, and                  |
| 20       |    | this is a long time ago when we were first                   |
| 21       |    | automating the network, there was no belief or               |
| 22       |    | understanding at my level, at my operational                 |
| 23       |    | level, at my team's level, that there was any                |
| 24       |    | reason to distrust the technology. So, you                   |
| 25       |    | know, we were told quite clearly, in fact on<br>137          |
|          |    |  |
|          |    |  |
| 1        | _  | were asked to do on a daily basis.                           |
| 2        | Q. | You've mentioned Don Grey. Are you aware of                  |
| 3        |    | whether this message that Horizon was robust,                |
| 4        |    | did that are you aware whether that came from                |
| 5        |    | any higher than Don Grey?                                    |
| 6        | Α. | I'm sorry, I couldn't say.                                   |
| 7        | Q. | You said as well in your evidence that it wasn't             |
| 8        |    | just then that message was repeated.                         |
| 9        | A. | Yes.   |
| 10       | Q. | Can you provide other examples? I know we're                 |
| 11       |    | jumping ahead but other examples of when you                 |
| 12       |    | were told that the system was robust?                        |
| 13       | Α. | Well, I guess as well there was a I suppose                  |
| 14       |    | I've got to try and convey the and give                      |
| 15       |    | context. So, you know, it was a massive                      |
| 16       |    | transformation for the Post Office from manual               |
| 17       |    | to automation. Of course, we were all                        |
| 18<br>10 |    | understanding of it was that or Post Office                  |
| 19<br>20 |    | ceases to be relevant and probably exist. So we              |
| 20       |    | understood the journey and the strategy. We                  |
| 21<br>22 |    | didn't go into it doubting it, I guess, is what              |
| 22       |    | we were saying. We went into it accepting that               |
| 23<br>24 |    | it was going to work. No reason to challenge it              |
| 24<br>25 |    | at that stage.<br>Now, over time, evidence obviously started |
| 20       |    | 139  |
|          |    |  |

| 1  |    | numerous occasions throughout my time, that   |
|--|----|---|
| 2  |    | there were no Horizon integrity issues, and   |
| 3  |    | there were no systemic issues. So at the time,  |
| 4  |    | I think the stance would probably have been the   |
| 5  |    | solution works as per Post Office's   |
| 6  |    | requirements, as per the design, therefore there  |
| 7  |    | wouldn't be such a situation arise, I'm   |
| 8  |    | assuming that would have been the stance,   |
| 9  |    | rightly or wrongly.   |
| 10   | Q. | At this time, can you recall who was saying or  |
| 11   |    | telling you that the system was robust? So this   |
| 12   |    | is in 2000?   |
| 13   | A. | I can't be specific but I'd have to say the   |
| 14   |    | wider business. I can't remember the names of   |
| 15   |    | the senior managers or the leaders of the   |
| 16   |    | programme and the rollout, I'm afraid, at the   |
| 17   |    | time, although I do remember Don Grey because   |
| 18   |    | Don Grey was northeast regional office so that's  |
| 19   |    | where I came across Don. I knew he had some   |
| 20   |    | role to play within that.   |
| 20   |    | But the general message was one, which I can  |
| 22   |    | understand, even looking back, of trying to   |
| 22   |    | ensure that, you know, operational people had   |
| 23   |    | confidence to go about the processes that we'd  |
| 24<br>25   |    | •   |
| 25   |    | been that had been implemented and what we<br>138   |
|  |    | 100   |
|  |    |   |
|  |    |   |
| 1  |    | to came in. We had improved knowledge, improved   |
| 1<br>2   |    | to came in. We had improved knowledge, improved experience over that same time frame, so,   |
|  |    |   |
| 2  |    | experience over that same time frame, so,   |
| 2<br>3   |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with  |
| 2<br>3<br>4  |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or   |
| 2<br>3<br>4<br>5   |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate   |
| 2<br>3<br>4<br>5<br>6  |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.  |
| 2<br>3<br>4<br>5<br>6<br>7   |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11   |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we<br>weren't sure.  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13   |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we<br>weren't sure.<br>So I can think of, when it started to be in   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14   |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we<br>weren't sure.<br>So I can think of, when it started to be in<br>the press, when there were postmasters who were  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we<br>weren't sure.<br>So I can think of, when it started to be in<br>the press, when there were postmasters who were<br>starting to take, I think, personal litigation,   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16   |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we<br>weren't sure.<br>So I can think of, when it started to be in<br>the press, when there were postmasters who were<br>starting to take, I think, personal litigation,<br>then, I think, there were more frequent messages   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17   |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we<br>weren't sure.<br>So I can think of, when it started to be in<br>the press, when there were postmasters who were<br>starting to take, I think, personal litigation,<br>then, I think, there were more frequent messages<br>to reaffirm that Horizon was robust, Horizon   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we<br>weren't sure.<br>So I can think of, when it started to be in<br>the press, when there were postmasters who were<br>starting to take, I think, personal litigation,<br>then, I think, there were more frequent messages<br>to reaffirm that Horizon was robust, Horizon<br>integrity was there and there weren't issues.<br>I think there was also a third party I think  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we<br>weren't sure.<br>So I can think of, when it started to be in<br>the press, when there were postmasters who were<br>starting to take, I think, personal litigation,<br>then, I think, there were more frequent messages<br>to reaffirm that Horizon was robust, Horizon<br>integrity was there and there weren't issues.<br>I think there was also a third party I think<br>it was called Second Sight enquiry. Even  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we<br>weren't sure.<br>So I can think of, when it started to be in<br>the press, when there were postmasters who were<br>starting to take, I think, personal litigation,<br>then, I think, there were more frequent messages<br>to reaffirm that Horizon was robust, Horizon<br>integrity was there and there weren't issues.<br>I think there was also a third party I think<br>it was called Second Sight enquiry. Even<br>post that I remember the message being the same,  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we<br>weren't sure.<br>So I can think of, when it started to be in<br>the press, when there were postmasters who were<br>starting to take, I think, personal litigation,<br>then, I think, there were more frequent messages<br>to reaffirm that Horizon was robust, Horizon<br>integrity was there and there weren't issues.<br>I think there was also a third party I think<br>it was called Second Sight enquiry. Even<br>post that I remember the message being the same,<br>and I think there were also subsequent internal   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we<br>weren't sure.<br>So I can think of, when it started to be in<br>the press, when there were postmasters who were<br>starting to take, I think, personal litigation,<br>then, I think, there were more frequent messages<br>to reaffirm that Horizon was robust, Horizon<br>integrity was there and there weren't issues.<br>I think there was also a third party I think<br>it was called Second Sight enquiry. Even<br>post that I remember the message being the same,<br>and I think there were also subsequent internal<br>inquiries undertaken, and I might be in HNG-X  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we<br>weren't sure.<br>So I can think of, when it started to be in<br>the press, when there were postmasters who were<br>starting to take, I think, personal litigation,<br>then, I think, there were more frequent messages<br>to reaffirm that Horizon was robust, Horizon<br>integrity was there and there weren't issues.<br>I think there was also a third party I think<br>it was called Second Sight enquiry. Even<br>post that I remember the message being the same,<br>and I think there were also subsequent internal<br>inquiries undertaken, and I might be in HNG-X<br>chronology now, to also check and I think |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       |    | experience over that same time frame, so,<br>therefore, we became much more comfortable with<br>our ability to question or challenge or<br>certainly escalate to Fujitsu to investigate<br>something when it wasn't working correctly.<br>Legacy Horizon, that was incredibly difficult<br>because of the, you know, the steep learning<br>curve that we were all on. Probably not brave<br>enough either, if I'm honest, looking back to<br>challenge some of the things when maybe we<br>weren't sure.<br>So I can think of, when it started to be in<br>the press, when there were postmasters who were<br>starting to take, I think, personal litigation,<br>then, I think, there were more frequent messages<br>to reaffirm that Horizon was robust, Horizon<br>integrity was there and there weren't issues.<br>I think there was also a third party I think<br>it was called Second Sight enquiry. Even<br>post that I remember the message being the same,<br>and I think there were also subsequent internal<br>inquiries undertaken, and I might be in HNG-X  |

| 1  |    | Product and Branch Accounting, I can't remember   |
|----|----|---|
| 2  |    | the names of any of the individuals, I'm afraid.  |
| 3  |    | And that also confirmed and those                 |
| 4  |    | messages were filtered down to the operational    |
| 5  |    | teams.  |
| 6  | Q. | Actually, we'll come to that bit of the           |
| 7  |    | chronology later on. Back to 2000, when this      |
| 8  |    | document was being created and the message        |
| 9  |    | was and I think you said the belief was that      |
| 10 |    | the system was robust.                            |
| 11 | Α. | Yes.  |
| 12 | Q. | Do you accept that document is one of many which  |
| 13 |    | is setting up support services that were to be    |
| 14 |    | made available to subpostmasters using the        |
| 15 |    | Horizon Helpdesk                                  |
| 16 | Α. | Yes.  |
| 17 | Q. | or the NBSC?                                      |
| 18 | Α. | Yes.  |
| 19 | Q. | Is it fair to say that those systems that were    |
| 20 |    | put in place to provide assistance to them, were  |
| 21 |    | built on an assumption that the Horizon System    |
| 22 |    | was robust?                                       |
| 23 | Α. | Correct.  |
| 24 | Q. | Moving, then, to knowledge sharing within the     |
| 25 |    | NBSC. We're going to come to some examples of 141 |

| 1  |    | Now, naturally, if there was something fresh     |
|----|----|--|
| 2  |    | or new came in that was slightly unexpected or   |
| 3  |    | the timing wasn't great in terms of internal     |
| 4  |    | communications, there would sometimes be a gap   |
| 5  |    | between the Go Live of that, say, new            |
| 6  |    | transaction or that knowledge, whatever it was,  |
| 7  |    | and the creation of that knowledge article. So   |
| 8  |    | that's where we fell back on the more manual     |
| 9  |    | methodologies that I just mentioned, which would |
| 10 |    | really be ensuring people were informed word of  |
| 11 |    | mouth, emails and bulletin boards.               |
| 12 | Q. | Do you recall when this change occurred, when it |
| 13 |    | was mandatory to rely on knowledge articles?     |
| 14 | Α. | I think it was after I had gone down to the      |
| 15 |    | business service management function and, in     |
| 16 |    | fact, myself and one of my colleagues, Shaun     |
| 17 |    | Turner, were involved in supporting the initial  |
| 18 |    | set-up of a number of, you know, existing        |
| 19 |    | processes in terms of the documentation.         |
| 20 | Q. | Could you just describe what a knowledge article |
| 21 |    | looks like?                                      |
| 22 | Α. | It would literally be a Word document. It was    |
| 23 |    | put on to the Remedy it sat independently but    |
| 24 |    | accessed via what was the call log-in system,    |
| 25 |    | the Remedy system. It could involve anything.    |

| 1  |    | problems later on. It's uncontroversial that     |
|----|----|--|
| 2  |    | there were problems in the Horizon IT System.    |
| 3  |    | As a matter of generality, how when someone      |
| 4  |    | in the NBSC at the top became aware of           |
| 5  |    | a problem, how was that shared amongst the other |
| 6  |    | members of the team?                             |
| 7  | Α. | Within the NBSC environment itself?              |
| 8  | Q. | Yes.   |
| 9  | Α. | It was verbally cascaded. We also had bulletin   |
| 10 |    | boards, or there was ad hoc, infrequent team     |
| 11 |    | meetings where the information was provided.     |
| 12 |    | Now, I can't remember the exact introduction but |
| 13 |    | I don't think it was at the very, very beginning |
| 14 |    | of the NBSC, but we also introduced knowledge    |
| 15 |    | articles, and those knowledge articles           |
| 16 |    | ultimately, over time, became, I would say,      |
| 17 |    | mandatory in terms of their usage.               |
| 18 |    | You had to use a knowledge article. You had      |
| 19 |    | to associate the call that you'd had, the ticket |
| 20 |    | that you'd logged, with the knowledge article    |
| 21 |    | that you had used to advise and guide the        |
| 22 |    | caller. And there was a team of people set up    |
| 23 |    | to produce those articles, manage those          |
| 24 |    | articles, maintain those articles. So that was   |
| 25 |    | the other method.                                |
|    |    | 142  |
|    |    |  |

| 1  |    | It could involve Counter News articles that were   |
|----|----|--|
| 2  |    | literally just almost copy and pasted into         |
| 3  |    | an electronic format. It could involve process     |
| 4  |    | flow maps with, you know, swim lanes in terms of   |
| 5  |    | start and finishing and different people might     |
| 6  |    | need to be interact or involved. It could          |
| 7  |    | involve diagrams. There were pictorial evidence    |
| 8  |    | as well to show what screens looked like in        |
| 9  |    | terms of trying to guide the NBSC agent and the    |
| 10 |    | office.  |
| 11 | Q. | To what extent were the use of scripts used in     |
| 12 |    | the NBSC, call scripts?                            |
| 13 | Α. | There may have been a script on occasion.          |
| 14 |    | Normally, I would have said that would come off    |
| 15 |    | the back of an unplanned event of some             |
| 16 |    | description, something that's happened untoward    |
| 17 |    | and, therefore, there would be a scripted          |
| 18 |    | response given. I don't actually remember          |
| 19 |    | a time where we were told quite, you know,         |
| 20 |    | precisely to follow, almost word for word,         |
| 21 |    | a script, but that would be the situation, where   |
| 22 |    | we'd have something that was perhaps more          |
| 23 |    | temporary in nature than the more permanent way    |
| 24 |    | of responding to the enquiries.                    |
| 25 | Q. | So perhaps in response to a major incident?<br>144 |

| 1  | Α. |  |
|----|----|--|
| 2  |    | something that's occurred that branches may call |
| 3  |    | in about and need to be aware of.                |
| 4  | Q. | Were you ever aware of subpostmasters being told |
| 5  |    | by members of the NBSC that they were the only   |
| 6  |    | person experiencing problems using the Horizon   |
| 7  |    | IT System?                                       |
| 8  | Α. | No. I mean, that's not something I certainly     |
| 9  |    | would have told my team. That sounds I'm         |
| 10 |    | offering an opinion here but that sounds         |
| 11 |    | slightly rogue to me, rather than anything that  |
| 12 |    | would have been directed.                        |
| 13 | Q. | That's internally to Post Office. Were you       |
| 14 |    | aware of anything along the same lines being     |
| 15 |    | communicated to people working on the Fujitsu    |
| 16 |    | helpdesk?  |
| 17 | Α. | No, I didn't really have a great deal of         |
| 18 |    | visibility of their internal ways of working.    |
| 19 | Q. | I want to move now to your problem management    |
| 20 |    | role, and please can we been up paragraph 5 of   |
| 21 |    | your witness statement on page 2. I'll read the  |
| 22 |    | last line and then go over the page. What you    |
| 23 |    | say is:  |
| 24 |    | "But what I do remember is that the role was     |
| 25 |    | largely reactive in nature not particularly      |
|    |    | 145  |
|    |    |  |
| 1  |    | happen.  |
| 2  |    | So to start off with, the problem management     |
| 3  |    | role in my time was very much just simply        |
| 4  |    | reacting to what had already occurred.           |
| 5  |    | Hopefully, we would learn from that lesson,      |
| 6  |    | though, and increase and mature over time in     |
| 7  |    | terms of the ability to look out for certain     |
| 8  |    | things and prevent things from being repeated.   |
| 9  |    | That's kind of what I mean about it being        |
| 10 |    | largely reactive at the time I was the problem   |
| 11 |    | manager.   |
| 12 | Q. | In your role as problem manager, would you have  |
| 13 |    | benefited from more internal technical support,  |
| 14 |    | technical IT support?                            |
| 15 | Α. | Oh, without doubt. I have no personal technical  |
| 16 |    | background whatsoever: Post Office man and boy,  |
| 17 |    | business training. Yes, I could answer           |
| 18 |    | transactional queries and help postmasters, I'd  |
| 19 |    | done the job. Technology-wise, no. I felt that   |
| 20 |    | we were in a position where Fujitsu were the     |
| 21 |    | chosen supplier. If we needed to go to Fujitsu,  |
| 22 |    | l'd go to Fujitsu. Whatever Fujitsu came back    |
| 23 |    | with, it was incredibly difficult to challenge,  |
| 24 |    | if at all, if it was technical.                  |
| 25 |    | If it didn't feel right, if there was            |
|    |    | 147  |

|         |    | predictive of preventative and therefore a lot                                       |
|---------|----|--|
| 2       |    | of the work that I would have undertaken   |
| 3       |    | alongside my colleagues came from analysis of  |
| 4       |    | the calls that had been received by the NBSC or                                      |
| 5       |    | thematic incidents."   |
| 6       |    | In general terms, what were the types of   |
| 7       |    | problems that you were seeking to analyse from                                       |
| 8       |    | these call records?  |
| 9       | Α. | You were looking for any trend at all in terms                                       |
| 10      |    | of a volume of call, a particular type of call,                                      |
| 11      |    | business in nature, potentially technical in   |
| 12      |    | nature and absolutely in relation to accounting.                                     |
| 13      |    | Anything that might indicate there was a way of                                      |
| 14      |    | us operating better, doing something better or                                       |
| 15      |    | something potentially that needed fixing.  |
| 16      | Q. | When you say the role was not particularly   |
| 17      |    | predictive, what do you mean by that?  |
| 18      | Α. | I think again, I come back to a bit of   |
| 19      |    | a chronology and a bit about the learning curve                                      |
| 20      |    | and everyone being, you know, on the same  |
| 21      |    | journey, very difficult back in the time in  |
| 22      |    | the day, when I think about it. I guess I'm  |
| 23      |    | trying to suggest that we probably had limited                                       |
| 24      |    | capability of predicting what might happen and                                       |
| 25      |    | we were learning through experience what could 146                                   |
| 1       |    | something that wasn't sitting well with you, we                                      |
| 2       |    | had a few strategic individuals in the business                                      |
| 2       |    | that we could go to and ask them to have a look,                                     |
| 3<br>4  |    | people like Ian Trundle and Bob Booth are two  |
| 4<br>5  |    | people I know particularly supported me, not   |
| 6       |    | necessarily with accounting issues but with  |
| 7       |    | , ,  |
| ,<br>8  |    | certainly large-scale geographic incidents that                                      |
| 0<br>9  |    | we had, but no, we were very much trusting the supplier for the technical knowledge. |
| 9<br>10 | Q. | Just on that, please could we bring up page 5 of                                     |
| 10      | ω. | your witness statement and the paragraph at the                                      |
| 12      |    | top. I think this relates to evidence you just                                       |
| 12      |    | gave. You say that:  |
| 13      |    | yave. Tou Say Illal.   |

predictive or preventative and therefore a lot

14 "The Post Office IT function did have a team
15 of Business Relationship Managers run by Chris
16 Taylor that were technical."

## 17 A. Yes.

18 Q. Just to clarify, those are different, are they, from the managers, the contract managers who -20 A. Oh yes. Yeah, yeah, those guys were all based down in London. They were very much working with the business from an innovation and a future transactional perspective but all of them naturally very technical in understanding in terms of the Horizon System. So they weren't

148

| 1  |          | there for us to be used on the process. You  |
|--|----------|--|
| 2  |          | won't find it written in a document, you know,   |
| 3  |          | "Escalate to Chris or the team", but we did lean   |
| 4  | _        | on them when we felt it was necessary.   |
| 5  | Q.       | Again, you refer to Ian Trundle and Bob Booth.   |
| 6  |          | You say:   |
| 7  |          | "Whilst also supportive, these   |
| 8  |          | individuals/teams were primarily strategically   |
| 9  |          | focused and not designed to be regularly engaged   |
| 10   |          | in the operational day-to-day running."  |
| 11   |          | What do you mean by "strategically focused"?   |
| 12   | Α.       | On next steps, on the future, on development of  |
| 13   |          | software, it tended, as I say, to be linked to   |
| 14   |          | my knowledge to business activity, rather than,  |
| 15   |          | you know, focusing entirely on the technology.   |
| 16   |          | But they were the people who would, from my  |
| 17   |          | perspective, interact with Fujitsu on a very   |
| 18   |          | regular basis in terms of how of the solution  |
| 19   |          | worked. I'm sure they were both involved in  |
| 20   |          | an awful lot of programme activity and an awful  |
| 21   |          | lot of determining Post Office's requirements of   |
| 22   | _        | the technology.  |
| 23   | Q.       |  |
| 24   |          | internal IT support on the operational   |
| 25   |          | day-to-day matters to be able to test what<br>149  |
|  |          | 140  |
|  |          |  |
|  |          |  |
| 1  |          | FUJ00079946. This is "[Post Office Account]  |
| 1<br>2   |          | FUJ00079946. This is "[Post Office Account]<br>Customer Service Major Incident Escalation  |
|  |          |  |
| 2  |          | Customer Service Major Incident Escalation   |
| 2<br>3   |          | Customer Service Major Incident Escalation<br>Process". Is this something you would have   |
| 2<br>3<br>4  | А.       | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office   |
| 2<br>3<br>4<br>5   | A.       | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?   |
| 2<br>3<br>4<br>5<br>6  | A.       | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office   |
| 2<br>3<br>4<br>5<br>6<br>7   | A.       | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were  |
| 2<br>3<br>5<br>6<br>7<br>8<br>9  |          | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   |          | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.<br>Can we turn to page 7, please. I should say   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   |          | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.<br>Can we turn to page 7, please. I should say<br>that document was dated 3 October 2006. Under  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11   |          | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.<br>Can we turn to page 7, please. I should say   |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14   |          | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.<br>Can we turn to page 7, please. I should say<br>that document was dated 3 October 2006. Under<br>the heading "Process Objective", the fourth<br>bullet point says one of the objectives was to:  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   |          | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.<br>Can we turn to page 7, please. I should say<br>that document was dated 3 October 2006. Under<br>the heading "Process Objective", the fourth<br>bullet point says one of the objectives was to:<br>"Avoid unnecessary alerting of the<br>customer."<br>In this context, who was the customer:  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     |          | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.<br>Can we turn to page 7, please. I should say<br>that document was dated 3 October 2006. Under<br>the heading "Process Objective", the fourth<br>bullet point says one of the objectives was to:<br>"Avoid unnecessary alerting of the<br>customer."<br>In this context, who was the customer:<br>a subpostmaster or the Post Office itself?  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               |          | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.<br>Can we turn to page 7, please. I should say<br>that document was dated 3 October 2006. Under<br>the heading "Process Objective", the fourth<br>bullet point says one of the objectives was to:<br>"Avoid unnecessary alerting of the<br>customer."<br>In this context, who was the customer:<br>a subpostmaster or the Post Office itself?<br>My reading of that would have been "clients"  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | Q.       | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.<br>Can we turn to page 7, please. I should say<br>that document was dated 3 October 2006. Under<br>the heading "Process Objective", the fourth<br>bullet point says one of the objectives was to:<br>"Avoid unnecessary alerting of the<br>customer."<br>In this context, who was the customer:<br>a subpostmaster or the Post Office itself?<br>My reading of that would have been "clients"<br>would be another way of looking at it. So at  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | Q.       | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.<br>Can we turn to page 7, please. I should say<br>that document was dated 3 October 2006. Under<br>the heading "Process Objective", the fourth<br>bullet point says one of the objectives was to:<br>"Avoid unnecessary alerting of the<br>customer."<br>In this context, who was the customer:<br>a subpostmaster or the Post Office itself?<br>My reading of that would have been "clients"<br>would be another way of looking at it. So at<br>the time a major one was well, they were  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | Q.       | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.<br>Can we turn to page 7, please. I should say<br>that document was dated 3 October 2006. Under<br>the heading "Process Objective", the fourth<br>bullet point says one of the objectives was to:<br>"Avoid unnecessary alerting of the<br>customer."<br>In this context, who was the customer:<br>a subpostmaster or the Post Office itself?<br>My reading of that would have been "clients"<br>would be another way of looking at it. So at<br>the time a major one was well, they were<br>Alliance & Leicester at the time, I think. So   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q.       | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.<br>Can we turn to page 7, please. I should say<br>that document was dated 3 October 2006. Under<br>the heading "Process Objective", the fourth<br>bullet point says one of the objectives was to:<br>"Avoid unnecessary alerting of the<br>customer."<br>In this context, who was the customer:<br>a subpostmaster or the Post Office itself?<br>My reading of that would have been "clients"<br>would be another way of looking at it. So at<br>the time a major one was well, they were<br>Alliance & Leicester at the time, I think. So<br>I think it's referring to them rather than to                        |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | Q.<br>A. | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.<br>Can we turn to page 7, please. I should say<br>that document was dated 3 October 2006. Under<br>the heading "Process Objective", the fourth<br>bullet point says one of the objectives was to:<br>"Avoid unnecessary alerting of the<br>customer."<br>In this context, who was the customer:<br>a subpostmaster or the Post Office itself?<br>My reading of that would have been "clients"<br>would be another way of looking at it. So at<br>the time a major one was well, they were<br>Alliance & Leicester at the time, I think. So<br>I think it's referring to them rather than to<br>the branch network. |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q.       | Customer Service Major Incident Escalation<br>Process". Is this something you would have<br>worked towards well, worked with when dealing<br>with major incidents?<br>Yes, I'm fairly sure, looking at the Post Office<br>distribution list, those two gentlemen were<br>either my line managers at one point in time or<br>line manager's line manager, so Dave Hulbert and<br>Richard Ashcroft.<br>Can we turn to page 7, please. I should say<br>that document was dated 3 October 2006. Under<br>the heading "Process Objective", the fourth<br>bullet point says one of the objectives was to:<br>"Avoid unnecessary alerting of the<br>customer."<br>In this context, who was the customer:<br>a subpostmaster or the Post Office itself?<br>My reading of that would have been "clients"<br>would be another way of looking at it. So at<br>the time a major one was well, they were<br>Alliance & Leicester at the time, I think. So<br>I think it's referring to them rather than to                        |

| 1  |                            | Fujitsu was saying to you?  |
|--|----------------------------|---|
| 2  | Α.                         | No, I don't believe that we did. Again, that  |
| 3  |                            | sort of stems from a belief of there were no  |
| 4  |                            | issues with the Horizon System. So back in HNG  |
| 5  |                            | or Horizon Legacy, I think you refer to it, it  |
| 6  |                            | was part of the learning curve again. So it   |
| 7  |                            | just didn't really necessarily occur at the   |
| 8  |                            | time.   |
| 9  | Q.                         | I'm going to come on now to some of the   |
| 10   |                            | processes involved in problem management and we   |
| 11   |                            | have a distinction between incident management  |
| 12   |                            | and problem management.   |
| 13   | Α.                         | Yes.  |
| 14   | Q.                         | The Inquiry has heard evidence that incident  |
| 15   | હ.                         | management relates to dealing with the symptoms   |
| 16   |                            |   |
|  |                            | of a particular issue such as a server failure,   |
| 17   |                            | whereas the problem looks at the underlying   |
| 18   |                            | causes of the incident. Do you broadly agree  |
| 19   |                            | with that?  |
| 20   | Α.                         | Yes. My role in incident management, we always  |
| 21   |                            | focused on service restoration and then, you  |
| 22   |                            | know, ideally we'd identify the root cause but,   |
| 23   |                            | if not, that was always part of problem   |
| 24   |                            | management's job once handed off.   |
| 25   | Q.                         | Please could we bring up the document   |
|  |                            | 150   |
|  |                            |   |
|  |                            |   |
| 1  | Α.                         | Yes.  |
| 1<br>2   |                            |   |
| 2  | A.<br>Q.                   | What do you understand then of the purpose of   |
| 2<br>3   | Q.                         | What do you understand then of the purpose of "avoiding unnecessary alerting"?  |
| 2<br>3<br>4  |                            | What do you understand then of the purpose of<br>"avoiding unnecessary alerting"?<br>It just doesn't sound right, does it, when   |
| 2<br>3<br>4<br>5   | Q.                         | What do you understand then of the purpose of<br>"avoiding unnecessary alerting"?<br>It just doesn't sound right, does it, when<br>I read it today at all. I'd be guessing, to be   |
| 2<br>3<br>4<br>5<br>6  | Q.                         | What do you understand then of the purpose of<br>"avoiding unnecessary alerting"?<br>It just doesn't sound right, does it, when<br>I read it today at all. I'd be guessing, to be<br>perfectly honest. I'm not entirely clear. It's   |
| 2<br>3<br>4<br>5<br>6<br>7   | Q.                         | What do you understand then of the purpose of<br>"avoiding unnecessary alerting"?<br>It just doesn't sound right, does it, when<br>I read it today at all. I'd be guessing, to be<br>perfectly honest. I'm not entirely clear. It's<br>a bit ambiguous, isn't it? I don't know if it  |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Q.<br>A.<br>Q.<br>A.<br>Q. | What do you understand then of the purpose of<br>"avoiding unnecessary alerting"?<br>It just doesn't sound right, does it, when<br>I read it today at all. I'd be guessing, to be<br>perfectly honest. I'm not entirely clear. It's<br>a bit ambiguous, isn't it? I don't know if it<br>was just purely wanting to protect brand.<br>We have the last, and four bullet points up:<br>"Demonstrate to the Post Office a more<br>professional approach [and]<br>"Improved governance."<br>Had there been, before this document, what<br>was perceived to be a lack of a professional<br>approach from Fujitsu, from your perspective?<br>I don't actually know, if I'm honest, because<br>this is this 2006? Sorry.<br>I think if we can just come just to double<br>check, if we can come out to the full page,<br>please. Thank you. Ah, sorry, 27 June 2005.<br>It's near enough, isn't it? No, if I'm being<br>honest, and it is recollection, no, I don't  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | Q.<br>A.<br>Q.<br>A.<br>Q. | What do you understand then of the purpose of<br>"avoiding unnecessary alerting"?<br>It just doesn't sound right, does it, when<br>I read it today at all. I'd be guessing, to be<br>perfectly honest. I'm not entirely clear. It's<br>a bit ambiguous, isn't it? I don't know if it<br>was just purely wanting to protect brand.<br>We have the last, and four bullet points up:<br>"Demonstrate to the Post Office a more<br>professional approach [and]<br>"Improved governance."<br>Had there been, before this document, what<br>was perceived to be a lack of a professional<br>approach from Fujitsu, from your perspective?<br>I don't actually know, if I'm honest, because<br>this is this 2006? Sorry.<br>I think if we can just come just to double<br>check, if we can come out to the full page,<br>please. Thank you. Ah, sorry, 27 June 2005.<br>It's near enough, isn't it? No, if I'm being<br>honest, and it is recollection, no, I don't<br>remember there being poor governance. Perhaps |

| 1      |    | remember there being governance issues, but it   |
|--------|----|--|
| 2      |    | might be a more appropriate question for David   |
| 3      | _  | Hulbert or Richard Ashcroft.   |
| 4      | Q. |  |
| 5      |    | point at the bottom of this well, the  |
| 6<br>7 |    | penultimate one now, says:   |
| 8      |    | "The Fujitsu Service Delivery Manager (or  |
| 0<br>9 |    | Duty Manager out of hours) is responsible for<br>communicating both <u>up</u> the Fujitsu Organisation |
| 10     |    | and across (see appendix A) to their counterpart   |
| 11     |    | in POL."   |
| 12     |    | Now, in your experience of dealing with  |
| 13     |    | incident management, did you feel that Fujitsu   |
| 14     |    | kept you or the Post Office appropriately aware  |
| 15     |    | of any incidents as they arose?  |
| 16     | Α. | Well, they certainly made us aware of the  |
| 17     |    | incidents when they arose. It would be   |
| 18     |    | difficult, I guess, for me to second-guess that  |
| 19     |    | and challenge whether or not it was always done  |
| 20     |    | in a timely manner or whether it was always  |
| 21     |    | exactly what they knew at the time. It would   |
| 22     |    | be the communication, basic communication,   |
| 23     |    | ie would they call our duty manager out of hours   |
| 24     |    | to tell us there was an issue? The answer's  |
| 25     |    | yes.   |
|        |    | 153  |
|        |    |  |
| 1      |    | example a single counter post office which is  |
| 2      |    | unable to transact, regardless of its business   |
| 3      |    | volumes, is rated as a severity A."  |
| 4      |    | It then goes on to say:  |
| 5<br>6 |    | "For simplicity, Incidents are classified<br>into three impact levels", and uses high,                 |
| 7      |    | medium, low.   |
| 8      |    | Did an incident have to be a high impact to  |
| 9      |    | be a major incident?   |
| 10     | Α. | I think this is where I think the answer is  |
| 11     |    | yes and no and sorry for that but the way  |
| 12     |    | I remember the incident process management   |
| 13     |    | working was it's based upon knowledge and  |
| 14     |    | information at the time so it would be perfectly   |
| 15     |    | reasonable for us on occasions to have what  |
| 16     |    | might turn out to be false alarms that have been   |
| 17     |    | raised through that way and a decision taken by  |
| 18     |    | Fujitsu in the first instance that it was  |
| 19     |    | a high, and therefore the process followed and   |
| 20     |    | it might end up high and remain high   |
| 21     |    | post-understanding what the impact was,  |
| 22     |    | resolution and root cause.   |
| 23     |    | Equally, you know or conversely, it could  |
| 24     |    | work the other way ut could turn out that  |
|        |    | work the other way it could turn out that  |
| 25     |    | a decision was made by the Fujitsu duty manager<br>155   |

| 1        | Q.         | Well, at the time, do you recall having any      |
|----------|------------|--|
| 2        |            | concerns that, to put it bluntly, you were being |
| 3        |            | kept in the dark about any incidents?            |
| 4        | Α.         | I don't have any particular evidence but, on     |
| 5        |            | occasions, when you finally ended up with the    |
| 6        |            | full root cause analysis and the full            |
| 7        |            | documentation of the events, the timeline,       |
| 8        |            | et cetera, there would be an ability to reflect  |
| 9        |            | and think that it hadn't been your experience,   |
| 10       |            | in terms of the timing of, in terms of the       |
| 11       |            | quality of the information you were being        |
| 12       |            | provided.  |
| 13       | Q.         | When you say "on occasions", how often would     |
| 14       |            | that be?   |
| 15       | Α.         | Rarely. Rarely.                                  |
| 16       | Q.         | Could we please turn to page 9. Under "Incident  |
| 17       |            | classification", it says:                        |
| 18       |            | "As a general rule a Major Incident will         |
| 19       |            | always be an incident rated with severity level  |
| 20       |            | A (critical) in the POA Customer Service         |
| 21       |            | Incident Management Process Details document     |
| 22       |            | However not all incidents rated as severity      |
| 23       |            | level A qualify. This is because the severity    |
| 24       |            | levels do not necessarily translate to the       |
| 25       |            | global business impact on POL's business. For    |
|          |            | 154  |
|          |            |  |
| 1        |            | that the incident was medium or low, and it      |
| 2        |            | might not have been rung through but,            |
| 3        |            | subsequently, called through the following       |
| 4        |            | morning, often triggered by calls from the       |
| 5        |            | branch network, for example.                     |
| 6        | Q.         | If the incident wasn't declared a major incident |
| 7        | ч.         | and just an incident, how did that affect the    |
| 8        |            | way it was investigated?                         |
| 9        | Α.         | It would be timing, more than anything, in terms |
| 10       | <b>~</b> . | of waiting for the next you know, the            |
| 11       |            | following working day, excluding weekends, as    |
| 12       |            | well, so there could be some significant delay   |
| 13       |            | if a wrong diagnosis was made in the first       |
| 14       |            | instance. But that would never stop.             |
| 15       |            | It's that thing about reacting and               |
| 16       |            | predicting and preventing again. You get into    |
| 17       |            | that kind of scenario where you might have been  |
| 18       |            | able to look back and think we could have done   |
| 19       |            | something sooner if it had been identified as    |
| 20       |            | high and therefore communicated.                 |
| 20       |            | But branches, you know, if they were open        |
| 22       |            | and they didn't have the ability to trade, they  |
| 22       |            | would call into one of the two desks. That in    |
| 23<br>24 |            | itself could also then trigger what would turn   |
| 24       |            | out to be the major incident management          |
| 20       |            | 156  |
|          |            |  |

| 1  |          | response.  |
|--|----------|--|
| 2  | Q.       |  |
| 3  |          | FUJ00079886. This is 23 December 2002, "Fujitsu  |
| 4  |          | Services/Post Office Limited Interface Agreement   |
| 5  |          | for the Problem Management Interface", which is  |
| 6  |          | presumably a process you would have used as  |
| 7  |          | a problem manager?   |
| 8  | Α.       | Yeah, I think that's about the right timing.   |
| 9  | ~        | Yes.   |
| 10<br>11   | Q.       | Can we turn to page 7 of this document and,  |
| 12   |          | under 5.3, there is "Fujitsu Services specific<br>responsibilities". It says:  |
| 12   |          | "Fujitsu Services will update the problem  |
| 13   |          | Management Database daily (as problems are   |
| 14   |          | updated).  |
| 16   |          | "Fujitsu Services will provide POL with  |
| 17   |          | remote access (via dial up) to the Fujitsu   |
| 18   |          | Services problem management database."   |
| 19   |          | Do you recall whether, in your time as   |
| 20   |          | a problem manager, you had access to that  |
| 21   |          | Fujitsu database?  |
| 22   | Α.       | Yes. I've got to say it wasn't the best  |
| 23   |          | experience. I seem to remember we had two  |
| 24   |          | ' machines that allowed us that dial-up access to  |
| 25   |          | the tool, but it was a way of audit trailing and   |
|  |          | 157  |
|  |          |  |
| 1  |          | document. Under section 11.1, it refers to a:  |
| 2  |          | " Cross Domain Problem Management Forum  |
| 3  |          | [being] held monthly prior to the Service  |
| 4  |          | Management Forum and is intended to  |
| 5  |          |  |
| 6  |          | highlight and discuss all problems if time   |
|  |          | highlight and discuss all problems if time allows."  |
| 7  |          |  |
| 7<br>8   | А.       | allows."   |
|  | Α.       | allows."<br>Would you have attended that?  |
| 8  | A.       | allows."<br>Would you have attended that?<br>No, I don't think I did, actually. Because of   |
| 8<br>9<br>10<br>11   | A.       | allows."<br>Would you have attended that?<br>No, I don't think I did, actually. Because of<br>the age of the document, I was relatively new to   |
| 8<br>9<br>10<br>11<br>12   | A.       | allows."<br>Would you have attended that?<br>No, I don't think I did, actually. Because of<br>the age of the document, I was relatively new to<br>the team and junior, therefore. Some of names<br>on the front of the document I recognise,<br>I notice Stephen Potter's name there, for  |
| 8<br>9<br>10<br>11<br>12<br>13   | Α.       | allows."<br>Would you have attended that?<br>No, I don't think I did, actually. Because of<br>the age of the document, I was relatively new to<br>the team and junior, therefore. Some of names<br>on the front of the document I recognise,<br>I notice Stephen Potter's name there, for<br>example. He was a colleague of mine. He would   |
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| turn up i 600000013. So tins describes the      |
|---|
| branch issue management process. Do you recall  |
| the role of the Fujitsu branch issue management |
| process?  |
| Only very high level. I certainly remember many |
| 159   |
|   |

| 1  |          | recording updates to whatever the problem record   |
|--|----------|--|
| 2  |          | was. It wasn't you know, you had to get up,  |
| 3  |          | if you like, and go sit there and go and look  |
| 4  |          | for an update, though often, is how I felt about   |
| 5  |          | the process rather than receipt of an email,   |
| 6  |          | receipt of a phone call, there's an update in  |
| 7  |          | the problem record or things like that. But  |
| 8  |          | that might be my memory and just my  |
| 9  |          | recollection.  |
| 10   | Q.       | Did you consider that the information on   |
| 11   |          | problems stored within it at the time was  |
| 12   |          | adequate for your purposes as a problem manager?   |
| 13   | Α.       | I'm going to have to say yes but that is not   |
| 14   |          | based upon an awful lot of recollection. You   |
| 15   |          | know, I can't think of any particular instance,  |
| 16   |          | for example, that would allow me to be more  |
| 17   |          | specific but certainly, you know, the basic  |
| 18   |          | intention was that the update would be provided  |
| 19   |          | for and, you know, if it wasn't appropriate,   |
| 20   |          | I certainly would have expected to have been   |
| 21   |          | challenging it and/or escalating it.   |
| 22   | Q.       | Was this another point when you were relying on  |
| 23   |          | Fujitsu's technical expertise?   |
| 24   | Α.       | Oh, totally, yes. Yes.   |
| 25   | Q.       | Please can we turn to page 12 of the same  |
|  |          | 158  |
|  |          |  |
|  |          |  |
| 1  |          | dealings with Niek Crow in particular. But for   |
| 1  |          | dealings with Nick Crow in particular. But for   |
| 2  |          | me, the difference for this role was it was  |
| 2<br>3   |          | me, the difference for this role was it was<br>meant to be much more proactive, from Fujitsu's   |
| 2<br>3<br>4  |          | me, the difference for this role was it was<br>meant to be much more proactive, from Fujitsu's<br>part, in regards to actively going out and   |
| 2<br>3<br>4<br>5   |          | me, the difference for this role was it was<br>meant to be much more proactive, from Fujitsu's<br>part, in regards to actively going out and<br>looking for issues. Again, I'm sure Nick would   |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8  |          | me, the difference for this role was it was<br>meant to be much more proactive, from Fujitsu's<br>part, in regards to actively going out and<br>looking for issues. Again, I'm sure Nick would<br>use lots and lots of helpdesk data to guide him<br>and help him, but he would be very, very field<br>based in regards to his role. Network more than   |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 |          | me, the difference for this role was it was<br>meant to be much more proactive, from Fujitsu's<br>part, in regards to actively going out and<br>looking for issues. Again, I'm sure Nick would<br>use lots and lots of helpdesk data to guide him<br>and help him, but he would be very, very field<br>based in regards to his role. Network more than<br>accounting discrepancies being, what I remember,<br>are lots and lots of challenges with the various<br>network methodologies that we used at the time<br>and Nick was an expert in that area and<br>particularly assessing the geographical location<br>of the branch environment which could, on<br>occasions, cause issues with the connectivity.<br>So just to clarify that, when you say "network"<br>rather than "accounting", does it mean, in your<br>experience, this process was looking more at,<br>say, issues where a rural branch may not be able<br>to connect to the servers rather than<br>a balancing discrepancy?<br>I think the scope would include both but my<br>recollection was that volume-wise would be much,<br>much more challenging and high numbers of |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       |          | me, the difference for this role was it was<br>meant to be much more proactive, from Fujitsu's<br>part, in regards to actively going out and<br>looking for issues. Again, I'm sure Nick would<br>use lots and lots of helpdesk data to guide him<br>and help him, but he would be very, very field<br>based in regards to his role. Network more than<br>accounting discrepancies being, what I remember,<br>are lots and lots of challenges with the various<br>network methodologies that we used at the time<br>and Nick was an expert in that area and<br>particularly assessing the geographical location<br>of the branch environment which could, on<br>occasions, cause issues with the connectivity.<br>So just to clarify that, when you say "network"<br>rather than "accounting", does it mean, in your<br>experience, this process was looking more at,<br>say, issues where a rural branch may not be able<br>to connect to the servers rather than<br>a balancing discrepancy?<br>I think the scope would include both but my<br>recollection was that volume-wise would be much,  |

update as I mentioned earlier, knowledge articles, for example, ensure that end users on the helpdesk were appropriately informed of anything that was particularly important, out there at the moment, major incidents.

what it sort of says on the tin: it was service restoration, hand off, root cause, problem

Q. But are you aware of a person within the Post Office who was to draw all of that information together to provide it to the NBSC to update the knowledge articles, and things like that?
A. No, no. I'm sorry, I'm not. I think it would have fallen to each functional area to ensure

a service, they, in effect, became another supplier to the Post Office and I think they were managed accordingly. I can't comment on Post Office's contribution to training for those

Q. In your recollection, when did that transfer

A. It would be a wild guess, I'm afraid, but I'm

going to say around about, I think, 2006/7 might

Q. The same questions really about these findings that problem management would make or incident management would make. How were those findings -- let me rephrase that, sorry.
 Was there one person who would be responsible for cascading that information to the people responsible for prosecuting

A. I don't know the name or whether they would but I wouldn't have expected it to have been the individual problem managers. I would have expected it to have been the leadership of that

Q. When you were a problem manager, were you ever approached by anyone in the team responsible for 164

agents post that time.

be the time frame.

subpostmasters?

function.

occur?

162

management.

function.

Incident management was, for me, very much

BIM was very much more, as I say, proactive is how I thought about it but Nick and the team, I feel, would interact with any relevant section of the Post Office. So if what Nick had have found or was asked to investigate was accounting discrepancies, for example, it's just as likely that he would have been involved with Product and Branch Accounting within the Post Office as he would be the business service management

| 1  | Q. | Can we turn to page 12 of the document, please.         | 1  |
|----|----|---|----|
| 2  |    | At the top, the Proactive BIM process. It says:         | 2  |
| 3  |    | "The BIM is also responsible for analysing              | 3  |
| 4  |    | trends and anomalies experienced at Branch              | 4  |
| 5  |    | level. The BIM will review the monthly                  | 5  |
| 6  |    | statistics, ie the Branch League Tables to              | 6  |
| 7  |    | identify exceptionally high instances of call           | 7  |
| 8  |    | numbers from Branches or other possible                 | 8  |
| 9  |    | indicators of potential issues."                        | 9  |
| 10 |    | Did you or anyone at Post Office have access            | 10 |
| 11 |    | to the branch league tables?                            | 11 |
| 12 | Α. | Not that I recall. It might have been something         | 12 |
| 13 |    | we'd have done similar from an NBSC perspective.        | 13 |
| 14 |    | I don't actually remember having visibility of          | 14 |
| 15 |    | Fujitsu's branch league table. That's not to            | 15 |
| 16 |    | say that I didn't. I just can't really                  | 16 |
| 17 |    | remember.   | 17 |
| 18 | Q. | So these sort of issues, where there's problem          | 18 |
| 19 |    | management, incident management and this                | 19 |
| 20 |    | process, the BIM process, how did that work, or         | 20 |
| 21 |    | the problem management team's work feed into the        | 21 |
| 22 |    | NBSC and the advice that the members of that            | 22 |
| 23 |    | team would provide?                                     | 23 |
| 24 | Α. | Of course, all of the roles are supposed to             | 24 |
| 25 |    | interact and share knowledge, share information,<br>161 | 25 |
|    |    |   |    |
| 1  |    | that they were informing the NBSC of or                 | 1  |
| 2  |    | advising the NBSC at a later stage of the               | 2  |
| 3  |    | benefits of a new knowledge article or updating         | 3  |
| 4  |    | an existing.  | 4  |
| 5  | Q. | Was there a risk or did you think there was             | 5  |
| 6  |    | a risk at the time that this knowledge wouldn't         | 6  |
| 7  |    | be passed on to the NBSC without a co-ordinating        | 7  |
| 8  |    | role?   | 8  |
| 9  | Α. | I think on reflection, yes, there would have            | 9  |
| 10 |    | been definitely been a risk that some                   | 10 |
| 11 |    | information may not have may have been lost             | 11 |
| 12 |    | in translation or may not have been communicated        | 12 |
| 13 |    | or articulated in a way that it meant to be. So         | 13 |
| 14 |    | it's entirely possible.                                 | 14 |
| 15 | Q. | Are you aware if the training for members of the        | 15 |
| 16 |    | NBSC was ever updated to take account of                | 16 |
| 17 |    | findings or information gleaned through the             | 17 |
| 18 |    | problem management process?                             | 18 |
| 19 | Α. | I'm not. Post my time, I believe I'm correct in         | 19 |
| 20 |    | this, the NBSC was, in effect, outsourced,              | 20 |
| 21 |    | albeit to Royal Mail. They were the owners of           | 21 |
| 22 |    | Dearne House, they provided a range of contact          | 22 |
| 23 |    | centre services to other clients of theirs, and         | 23 |
| 24 |    | were perceived as contact centre experts. So            | 24 |
| 25 |    | once that was relinquished, if you like, as<br>163      | 25 |
|    |    |   |    |

| 1      |    | prosecuting subpostmasters to provide            |
|--------|----|--|
| 2      |    | information on potential problems in the Horizon |
| 3      |    | IT System?                                       |
| 4      | Α. | I remember receiving requests to investigate     |
| 5      |    | and, therefore, engage Fujitsu, gather evidence  |
| 6      |    | potentially from the branch in regards to, you   |
| 7      |    | know, trial balances, et cetera, transaction     |
| 8      |    | logs and relay that information. So I certainly  |
| 9      |    | remember having those on occasion. I do, from    |
| 10     |    | perception, believe that they were quite low in  |
| 11     |    | comparison to the other types of problems that   |
| 12     |    | we handled at the time. But I don't then have    |
| 13     |    | any recollection, I'm afraid, at all about what  |
| 14     |    | happened post the conclusion of that problem,    |
| 15     |    | particularly if it was inconclusive, perhaps,    |
| 16     |    | rather than a very black and white response from |
| 17     |    | Fujitsu that declared that the system was        |
| 18     |    | working as per design and, therefore, there was  |
| 19     |    | no issue.  |
| 20     |    | Those would go back to, I don't know who         |
| 21     |    | would send them, but they would go back to and   |
| 22     |    | be due to go back to the appropriate retail      |
| 23     |    | network manager.                                 |
| 24     | Q. | So you might have your evidence is you might     |
| 25     |    | have or you remember someone involved in         |
|        |    | 165  |
|        |    |  |
| 1      |    | and Branch Accounting who, you know, naturally   |
| 2      |    | had visibility of the general accounting         |
| 3      |    | procedures, the records for every single branch  |
| 4      |    | in the network.                                  |
| -<br>5 | Q. |  |
| 6      | ч. | I asked about someone in the prosecution team    |
| 7      |    | asking you directly for that broader             |
| 8      |    | information                                      |
| 9      | Α. | No.  |
| 10     | Q. | I think you said no. You then pointed to         |
| 11     | ч. | Retail Network Managers.                         |
| 12     | Α. | Yes.   |
| 12     | Q. | l think again you gave examples of when it would |
| 14     | ч. | be specific cases that they would ask you about. |
| 15     |    | Do you recall the Retail Network Managers ever   |
| 16     |    | asking you proactively and broadly about general |
| 17     |    | problems in the Horizon IT System?               |
| 18     | Α. | Not proactively. It would be off the back of     |
| 19     | Α. | them being approached by a branch or them        |
| 20     |    | noticing a trend within a branch. Sorry, if      |
| 20     |    | I've understood that question, they would react  |
| 21     |    | to the knowledge and them becoming aware of      |
| 22     |    | a situation that they felt warranted further     |
| 23     |    | investigation.                                   |
| 24     | MR | STEVENS: Sir, that might be a suitable time to   |
| 20     |    | 167  |
|        |    |  |

| 1        |          | prosecutions asking you about particular cases.  |
|----------|----------|--|
| 2        |          | Do you have any recollection of a more proactive   |
| 3        |          | approach of someone in the prosecution   |
| 4        |          | department saying, "Can you provide us   |
| 5        |          | information generally on problems in the Horizon   |
| 6        |          | IT System?"  |
| 7        | Α.       | Not that I can remember but all of those types   |
| 8        |          | of enquiries would come from internal teams and  |
| 9        |          | that, for me, from my recollection, was the  |
| 10       |          | Retail Network Manager or the Field Intervention   |
| 11       |          | Officers, I think, some of them were called at   |
| 12       |          | a later date. So they would be the people out  |
| 13       |          | in the field who would have that day-to-day  |
| 14       |          | relationship and interaction with the branches.  |
| 15       |          | They may come to us for to request   |
| 16       |          | Fujitsu support and, in those examples, once   |
| 17       |          | we'd a conclusion of the investigation, it would   |
| 18       |          | go back from whence it came, so back to the  |
| 19       |          | Retail Network Manager for consideration.  |
| 20       |          | I think it's fair to say that, if it wasn't  |
| 21       |          | the answer that we'd all hoped for, in the sense   |
| 22       |          | that we'd found something that would explain   |
| 23       |          | whatever was occurring, that the retail network  |
| 24       |          | manager may have needed to then engage other   |
| 25       |          | parts of the business, again including Product<br>166  |
|          |          | 100  |
|          |          |  |
| 1        |          | take a break.  |
| 2        | SIR      | <b>WYN WILLIAMS:</b> Let me just unmute myself to say  |
| 3        |          | yes.   |
| 4        |          | <b>STEVENS:</b> Excellent, sir, if we could say 3.05?  |
| 5        |          | WYN WILLIAMS: Fine.  |
| 6        | (2.5     | 55 pm)   |
| 7        |          | (A short break)  |
| 8        | •        | 05 pm)   |
| 9        | MR       | STEVENS: Mr Blackburn, we've talked to about   |
| 10       |          | general matters, I now want to get into some of  |
| 11       |          | the specifics and the first one is a major   |
| 12<br>13 |          | incident on 9 May 2005. Please could I ask for   |
|          |          | POL00091917 to be brought up. This is the major  |
| 14<br>15 |          | incident report and we can see in the external   |
| 15<br>16 |          | distribution list, which is at the bottom, that you were included in this. Does that mean it's |
| 10       |          | ,  |
| 17       |          | an incident that you would have dealt with or<br>was it just for information only?             |
| 10       | A.       | No, it's quite possible that I would have played   |
| 20       | А.       | a major incident management role during the  |
| 20       |          | event itself.  |
| 21       | Q.       | Do you recall this incident at all?  |
| 22       | حد.<br>۸ | I'm correct don't Unfortunately there were   |

- 23 A. I'm sorry, I don't. Unfortunately, there were
- 24 quite a few, from memory.
- 25 **Q.** Could we turn to page 6, please. This says 168

### The Post Office Horizon IT Inquiry

| 1           | that the "Introduction" says that the:           | 1          |            | service, as it simply displays the details of    |
|-------------|--|------------|------------|--|
| 2           | " document details the initial incident          | 2          |            | Riposte Volumes.                                 |
| 3           | that occurred within the live estate between     | 3          |            | "Running this command stops Riposte services     |
| 4           | 09.00 and 10.00 for a four minute period on      | 4          |            | running for a micro-second and then starts       |
| 5           | Monday 9th May 2005 and the activities that were | 5          |            | (unlocks) the services again after the volume is |
| 6           | carried out for the remainder of the business    | 6          |            | taken. It is believed that in this instance,     |
| 7           | day by the appropriate POA Service Management    | 7          |            | due to a bug in Riposte, the services did not    |
| 8           | and support teams."                              | 8          |            | start again. A PEAK [with the number there] has  |
| 9           | If we go to page 8 now, please. Under the        | 9          |            | been raised with Escher development."            |
| 10          | "Description of the fault", I'll read this for   | 10         |            | Would you accept this appeared to be             |
| 11          | the record. It says:                             | 11         |            | a significant problem, in that it's referring to |
| 12          | "The incident that occurred presently hasn't     | 12         |            | a bug in the Riposte code?                       |
| 13          | a determined root cause and occurred within the  | 13         | Α.         | Yes.   |
| 14          | live ate whilst the SSC word analysing the       | 14         | Q.         | Did this concern you at the time?                |
| 15          | Correspondence Server volume capacity using the  | 15         | Α.         | Yes.   |
| 16          | RiposteVolume Command. The purpose of this       | 16         | Q.         | Is it right that, in your evidence, that these   |
| 17          | activity was to ensure that there available      | 17         |            | types of incidents would not be the outcomes     |
| 18          | spare disk capacity across the Correspondence    | 18         |            | of them would not be reported back to the branch |
| 19          | Server disk volumes.                             | 19         |            | network?   |
| 20          | "The work activity was carried out as            | 20         | Α.         | I certainly wouldn't have reported them back to  |
| 21          | a precautionary measure as a result of           | 21         |            | the branch network. It's unlikely, I would have  |
| 22          | an archiving job not completing following        | 22         |            | said, but I can't remember the particular event. |
| 23          | an event storm that occurred the previous week.  | 23         |            | There may have often been other circumstances    |
| 24          | "The RiposteVolume command has been used on      | 24         |            | where it was a necessity, because, you know, we  |
| 25          | numerous occasions before with no impact to      | 25         |            | couldn't perhaps establish which branches were   |
|             | 169  |            |            | 170  |
| 1           | impacted to what degree, so we may have          | 1          |            | Epay's systems have to match the reversal to the |
| 2           | understood the impact, but not been able to      | 2          |            | original authorisation request. The reversal     |
| 3           | identify it was branch A, B and C, for example,  | 3          |            | has to get to Epay within a time limit of 10     |
| 4           | and therefore you may have been on alert for     | 4          |            | minutes."  |
| 5           | waiting for a call. And that's the kind of       | 5          |            | Then the paragraph, skip that paragraph.         |
| 6           | thing that we referred to earlier that might     | 6          |            | The next one is:                                 |
| 7           | have generated a script on the Network Business  | 7          |            | "Because of the problems with the                |
| 8           | Support Centre, to capture that information and  | 8          |            | Correspondence server replication on this day,   |
| 9           | then make sure it's processed accordingly,       | 9          |            | a number of these reversals did not get through  |
| 10          | ie a correction, if a correction was required,   | 10         |            | within the time limits."                         |
| 11          | is applied.                                      | 11         |            | Do you think because of that, because of         |
| 12          | But I'm sorry, I really don't remember the       | 12         |            | reversals not being to be made, that could have  |
| 13          | detail of this particular incident.              | 13         |            | led to discrepancies within accounts             |
| 14 <b>Q</b> |  | 14         | Α.         |  |
| 15          | My apologies. Under the table, the first three   | 15         | Q.         |  |
| 16          | paragraphs refer to "E Top Up Transaction        | 16         | <u>с</u> . | Yes.   |
| 17          | failures", which presumably relates to mobile    | 17         |            | But if we now turn back to your witness          |
| 18          | phone top-ups?                                   | 18         | -          | statement, please, atparagraph 5, page 3 of      |
| 19 <b>A</b> |  | 19         |            | your statement, in the middle, you're referring  |
| 20 <b>Q</b> |  | 20         |            | to a different incident but say:                 |
| 21          | to the interface between Fujitsu and Epay. When  | 21         |            | "Post incident findings such as March 2005       |
| 22          | authorised transactions timeout at the counter   | 22         |            | were not shared with the branch network to my    |
| 23          | a reversal is automatically generated by the     | 23         |            | knowledge"                                       |
| 24          | counter. Transactions were timing out due to     | 20         | Α.         |  |
|             |  | <b>-</b> 1 |            |  |
| 24          | the correspondence server problems on this day.  | 25         | Q.         | So you said you don't have knowledge of this     |

| 1  |          | being shared.   |
|--|----------|---|
| 2  | A.       | Correct.  |
| 3  | Q.       | Is there anyone else who would have been dealing  |
| 4  |          | with this at the time who might have shared it  |
| 5  |          | without your knowledge?   |
| 6  | Α.       | Not directly, no. I don't have any recollection   |
| 7  |          | of it being communicated. At least what   |
| 8<br>9   |          | I probably alluded to just a minute ago, in   |
| 9<br>10  |          | regards to there'd have been a number of people<br>NBSC, HSH included, who would be looking out for   |
| 10   |          | calls. I think this is where Product and Branch   |
| 12   |          | Accounting would have played a large role as  |
| 13   |          | well, in regards to observing the accounts that   |
| 14   |          | were being completed. They would have had the   |
| 15   |          | ability to focus in on E top-up transactions as   |
| 16   |          | an example and see whether there were   |
| 17   |          | discrepancies that I guess, in theory, could  |
| 18   |          | align with that event.  |
| 19   | Q.       | · · · · · · · · · · · ·   |
| 20   |          | came to balance, that may be because of   |
| 21   |          | a transaction that occurred some time before?   |
| 22   | Α.       | Yes.  |
| 23   | Q.       | So when they come to balance, some time has   |
| 24   |          | passed, and it might be that a subpostmaster  |
| 25   |          | simply accepts a discrepancy as an error?   |
|  |          | 173   |
|  |          |   |
|  |          |   |
| 1  | Q.       | I want to now look at what's been called the  |
| 1<br>2   | Q.       | I want to now look at what's been called the<br>Callendar Square bug. Please can we turn to   |
|  | Q.       |   |
| 2  | Q.       | Callendar Square bug. Please can we turn to   |
| 2<br>3   | Q.       | Callendar Square bug. Please can we turn to POL00028984 and page 10. At the bottom there's  |
| 2<br>3<br>4  | Q.<br>A. | Callendar Square bug. Please can we turn to<br>POL00028984 and page 10. At the bottom there's<br>an email from Sandra MacKay. Do you remember   |
| 2<br>3<br>4<br>5   |          | Callendar Square bug. Please can we turn to<br>POL00028984 and page 10. At the bottom there's<br>an email from Sandra MacKay. Do you remember<br>who she was?   |
| 2<br>3<br>4<br>5<br>6  | A.       | Callendar Square bug. Please can we turn to<br>POL00028984 and page 10. At the bottom there's<br>an email from Sandra MacKay. Do you remember<br>who she was?<br>I'm sorry, no, I don't.  |
| 2<br>3<br>4<br>5<br>6<br>7   | A.       | Callendar Square bug. Please can we turn to<br>POL00028984 and page 10. At the bottom there's<br>an email from Sandra MacKay. Do you remember<br>who she was?<br>I'm sorry, no, I don't.<br>The project is "Callendar Square", which was  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | A.       | Callendar Square bug. Please can we turn to<br>POL00028984 and page 10. At the bottom there's<br>an email from Sandra MacKay. Do you remember<br>who she was?<br>I'm sorry, no, I don't.<br>The project is "Callendar Square", which was<br>a sub post office and the first line says   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | A.       | Callendar Square bug. Please can we turn to<br>POL00028984 and page 10. At the bottom there's<br>an email from Sandra MacKay. Do you remember<br>who she was?<br>I'm sorry, no, I don't.<br>The project is "Callendar Square", which was<br>a sub post office and the first line says<br>this is to Shaun Turner, I should say, sorry:<br>"You may recall that in September the above<br>office had major problems with their Horizon   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   | A.       | Callendar Square bug. Please can we turn to<br>POL00028984 and page 10. At the bottom there's<br>an email from Sandra MacKay. Do you remember<br>who she was?<br>I'm sorry, no, I don't.<br>The project is "Callendar Square", which was<br>a sub post office and the first line says<br>this is to Shaun Turner, I should say, sorry:<br>"You may recall that in September the above<br>office had major problems with their Horizon<br>system relating to transfers between stock   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13   | A.       | Callendar Square bug. Please can we turn to<br>POL00028984 and page 10. At the bottom there's<br>an email from Sandra MacKay. Do you remember<br>who she was?<br>I'm sorry, no, I don't.<br>The project is "Callendar Square", which was<br>a sub post office and the first line says<br>this is to Shaun Turner, I should say, sorry:<br>"You may recall that in September the above<br>office had major problems with their Horizon<br>system relating to transfers between stock<br>units."  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14   | A.       | Callendar Square bug. Please can we turn to<br>POL00028984 and page 10. At the bottom there's<br>an email from Sandra MacKay. Do you remember<br>who she was?<br>I'm sorry, no, I don't.<br>The project is "Callendar Square", which was<br>a sub post office and the first line says<br>this is to Shaun Turner, I should say, sorry:<br>"You may recall that in September the above<br>office had major problems with their Horizon<br>system relating to transfers between stock<br>units."<br>Go over the page.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   | A.       | Callendar Square bug. Please can we turn to<br>POL00028984 and page 10. At the bottom there's<br>an email from Sandra MacKay. Do you remember<br>who she was?<br>I'm sorry, no, I don't.<br>The project is "Callendar Square", which was<br>a sub post office and the first line says<br>this is to Shaun Turner, I should say, sorry:<br>"You may recall that in September the above<br>office had major problems with their Horizon<br>system relating to transfers between stock<br>units."<br>Go over the page.<br>"The SPMR has reported that he is again  |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | A.       | Callendar Square bug. Please can we turn to<br>POL00028984 and page 10. At the bottom there's<br>an email from Sandra MacKay. Do you remember<br>who she was?<br>I'm sorry, no, I don't.<br>The project is "Callendar Square", which was<br>a sub post office and the first line says<br>this is to Shaun Turner, I should say, sorry:<br>"You may recall that in September the above<br>office had major problems with their Horizon<br>system relating to transfers between stock<br>units."<br>Go over the page.<br>"The SPMR has reported that he is again<br>experiencing problems with transfers which<br>resulted in a loss of around [£43,000] which has<br>subsequently rectified itself. I know that the<br>SPMR has reported this to Horizon Support, who<br>have come back to him stating they cannot find<br>any problem."<br>Firstly, did you have any dealings with the  |

| 1  | Α. | As has always been problem, I think, yes, often  |
|----|----|--|
| 2  |    | the value would be a trigger. Large values, you  |
| 3  |    | know, would likely be reported. Low values may   |
| 4  |    | well have just been accepted without the         |
| 5  |    | knowledge, yes.                                  |
| 6  | Q. | What's the justification for the general policy  |
| 7  |    | that incidents such as this wouldn't have been   |
| 8  |    | shared with the branch network, so that the SPMs |
| 9  |    | could be aware of potential errors in the        |
| 10 |    | system?  |
| 11 | Α. | I couldn't comment on what the policy was or the |
| 12 |    | reasoning beyond, you know, operational role for |
| 13 |    | me, restore service, and the belief that there   |
| 14 |    | were no issues that were generated with the      |
| 15 |    | solution. Clearly, this was a major incident     |
| 16 |    | not necessarily software related, per se. It     |
| 17 |    | was something unintended that occurred that      |
| 18 |    | generated a discrepancy. I'd have expected       |
| 19 |    | Product and Branch Accounting to have cleaned up |
| 20 |    | this particular situation but can't say          |
| 21 |    | categorically that was what occurred.            |
| 22 | Q. | So is it your evidence that the communication    |
| 23 |    | the responsibility for the communication lay     |
| 24 |    | elsewhere?                                       |
| 25 | Α. | It exactly that, yes.                            |
|    |    | 174  |
|    |    |  |
| 1  | Q. | We'll get to there in a moment. Could we go to   |
| 2  |    | page 10, please. Just to follow the trail, we    |

| 2  |    | page 10, please. Just to follow the trail, we     |
|----|----|---|
| 3  |    | have we had Sandra MacKay's email at the          |
| 4  |    | bottom. We then have an email to Shaun Turner     |
| 5  |    | from Brian Trotter. Do you remember who Brian     |
| 6  |    | Trotter was?                                      |
| 7  | Α. | I'm going to say retail network management but    |
| 8  |    | I couldn't say specifically oh he's contract      |
| 9  |    | and service manager there, isn't he? But yes,     |
| 10 |    | I do recognise the name.                          |
| 11 | Q. | It says:  |
| 12 |    | " I visited the branch with Sandra last           |
| 13 |    | week and the SPMR provided clear documented       |
| 14 |    | evidence that something very wrong is occurring   |
| 15 |    | with some of the processors when carrying out     |
| 16 |    | transfers between stock units."                   |
| 17 |    | If we go over the page to page 9, we see          |
| 18 |    | what you just referred to as your involvement.    |
| 19 |    | It's an email from Shaun Turner dated 6 January   |
| 20 |    | 2006. He asked for your advice on this branch.    |
| 21 |    | Why would Shaun Turner have come to you for this  |
| 22 |    | particular issue?                                 |
| 23 | Α. | Purely the interaction and relationship with      |
| 24 |    | Fujitsu, so we were an escalation team. We        |
| 25 |    | weren't outwardly facing to branches. We were 176 |

| 1  |    | a level 2, if you like. And the Retail Network   |
|----|----|--|
| 2  |    | Management, all of them had the opportunity to   |
| 3  |    | raise escalations with us for us to engage       |
| 4  |    | Fujitsu and get them to investigate a particular |
| 5  |    | occurrence. And that's what happened on this     |
| 6  |    | occasion.  |
| 7  | Q. | Indeed, at the bottom, he describes a problem    |
| 8  |    | and his last sentence is:                        |
| 9  |    | "I am concerned that there is a fundamental      |
| 10 |    | flaw with the branches configuration, and would  |
| 11 |    | be interested to know how Fujitsu Services put   |
| 12 |    | the first issue to bed."                         |
| 13 |    | At this point in time, did you think this        |
| 14 |    | was an issue that was affecting a single branch  |
| 15 |    | or a wider issue?                                |
| 16 | Α. | Single.  |
| 17 | Q. | If we go up the page, I think it's to the next   |
| 18 |    | page, we'll see you email Liz Evans-Jones. Do    |
| 19 |    | you remember who she was?                        |
| 20 | Α. | Yeah, she was a higher level than me. In         |
| 21 |    | effect, she was my line manager's opposite. So   |
| 22 |    | I went straight to an escalated level within     |
| 23 |    | Fujitsu rather than go to the people I would     |
| 24 |    | ordinarily engage with.                          |
| 25 | Q. | Why did you decide to escalate it?               |
|    |    | 177  |

| Α. | A new software release that the business was |
|----|--|

| - |             |               |              |     |
|---|-------------|---------------|--------------|-----|
| 2 | working on. | It would have | contained ma | any |

- 3 things. I am assuming there are lots of
- 4 business related reasons for a new software
- 5 release but it would also have contained
- 6 a backlog of fixes for any bugs or defects that
- 7 had been found. I couldn't say on over what
- 8 time frame but, for me, I do remember S90 being
- 9 very important. I do seem to remember a lot of
- communication about its need being rolled out tothe branch network.
- 12 Q. At page 7, if we could go up, we see that you
  13 pass this on to Shaun Turner and then Shaun
  14 Turner goes on to reply to you.
- 15 A. Yes.

- Q. If we carry on up. Thank you. This is
   17 17 17 February now. The first question -- Shaun
   Turner asks three questions, the first of which
- 19 says:
- 20 "Do we understand why this particular branch21 has been having problems? Or are there other
- 22 branches in the network that have been having
- 23 this problem?"
- Now at this stage, had your view changed onfrom it being a single branch issue to having

| 1  | Α. | Shaun was somebody I'd got the greatest respect |
|----|----|---|
| 2  |    | for and trust for, I'd known him a very long    |
| 3  |    | time. His email was casting enough concern for  |
| 4  |    | me to do this on this occasion.                 |
| 5  | Q. | The £43,000 discrepancy, that's a large         |
| 6  |    | discrepancy?                                    |
| 7  | Α. | Yes, I mean obviously it is ridiculously large. |
| 8  |    | Having said that, numbers are everywhere in the |
| 9  |    | Post Office, and so it isn't necessarily        |
| 10 |    | a trigger. It was really the fact that Sean was |
| 11 |    | coming to me. Number 1, he was escalating to me |
| 12 |    | which meant it was important and, number 2, it  |
| 13 |    | just looked like something on the basis of his  |
| 14 |    | knowledge, his experience, that he was saying   |
| 15 |    | the system not working as it was intended. So   |
| 16 |    | I went straight to an escalated level on that   |
| 17 |    | occasion.                                       |
| 18 | Q. | Liz Evans-Jones's response is immediately above |
| 19 |    | this.   |
| 20 | Α. | Yeah.   |
| 21 | Q. | She says:                                       |
| 22 |    | "I have checked the call and this issue is      |
| 23 |    | schedule to be resolved in S90."                |
| 24 |    | What was your understanding of S90 at that      |
| 25 |    | point?  |
|    |    | 178   |
|    |    |   |

| 1  |    | concerns with it being a wider issue or not?     |
|----|----|--|
| 2  | Α. | It wasn't actually, no. So whilst I'd taken      |
| 3  |    | from Liz Melrose-Jones (sic) response that       |
| 4  |    | clearly Fujitsu were aware of it and/or a risk   |
| 5  |    | of it, this was my first experience of it        |
| 6  |    | actually occurring within the network. So at     |
| 7  |    | this point in time, clearly I was aware now that |
| 8  |    | there was a risk of others being impacted that   |
| 9  |    | this was the only branch specifically that I was |
| 10 |    | aware of.  |
| 11 | Q. | If we look at page 3 on this email chain we see  |
| 12 |    | on 23 February 2006, there's an email from Anne  |
| 13 |    | Chambers to Mike Stewart, which you were         |
| 14 |    | subsequently sent this email.                    |
| 15 | Α. | Yes.   |
| 16 | Q. | You would have read it at the time?              |
| 17 | Α. | Yes.   |
| 18 | Q. | The second paragraph says:                       |
| 19 |    | "Haven't looked at the recent evidence, but      |
| 20 |    | I know that in the past this site had hit this   |
| 21 |    | Riposte lock problem 2 or 3 times within a few   |
| 22 |    | weeks. This problem has been around for years    |
| 23 |    | and affects a number of sites most weeks, and    |
| 24 |    | finally Escher say they have done something      |
| 25 |    | about it."                                       |

| 1  |          | What did this mean to you when you read it?  |  |
|--|----------|--|--|
| 2  | Α.       | News. It's not something you know, I do  |  |
| 3  |          | actually when I've looked at all the evidence  |  |
| 4  |          | you've provided, whilst I couldn't remember the  |  |
| 5  |          | detail until I went back through the evidence,   |  |
| 6  |          | Callendar Square was a name and a Post Office  |  |
| 7  |          | that I remembered immediately because this was   |  |
| 8  |          | long running from my involvement, but that, to   |  |
| 9  |          | me, that statement was, I believe at the time,   |  |
| 10   |          | news to me. Not something I was aware of that  |  |
| 11<br>12   |          | branches could have this issue from Smart post   |  |
| 12   | Q.       | transactional problems.<br>Would this problem concern transfers from the   |  |
| 13   | Q.       | stock units, Callendar Square?   |  |
| 14   | A.       | l'd understood it was yes, but I thought I'd   |  |
| 16   | А.       | understood it was triggered by a particular  |  |
| 17   |          | transaction. I may be incorrect on that.   |  |
| 18   | Q.       | But in terms of the problem itself, the fact   |  |
| 19   | ч.       | that it's saying it's been around for years and  |  |
| 20   |          | it affects a number of sites was weeks, did you  |  |
| 21   |          | believe that was significant?  |  |
| 22   | Α.       | It's shocking. Yes, shocking. If especially  |  |
| 23   |          | on the basis of, as you could see from Liz's   |  |
| 24   |          | response, that if there was an awareness of it,  |  |
| 25   |          | there wasn't enough awareness of it, and it had  |  |
|  |          | 181  |  |
|  |          |  |  |
|  |          |  |  |
| 1  |          | by the held lock and advise them to reboot the   |  |
| 1<br>2   |          | by the held lock, and advise them to reboot the affect counter before continuing with the  |  |
| 2  |          | affect counter before continuing with the  |  |
|  |          |  |  |
| 2<br>3   |          | affect counter before continuing with the balance. Unfortunately in practice it seems to   |  |
| 2<br>3<br>4  |          | affect counter before continuing with the<br>balance. Unfortunately in practice it seems to<br>take SMC several hours to notice these storms,  |  |
| 2<br>3<br>4<br>5   |          | affect counter before continuing with the<br>balance. Unfortunately in practice it seems to<br>take SMC several hours to notice these storms,<br>by which time the damage may have been done."   |  |
| 2<br>3<br>4<br>5<br>6  |          | affect counter before continuing with the<br>balance. Unfortunately in practice it seems to<br>take SMC several hours to notice these storms,<br>by which time the damage may have been done."<br>Do you know what this refers to when it's  |  |
| 2<br>3<br>4<br>5<br>6<br>7   | А.       | affect counter before continuing with the<br>balance. Unfortunately in practice it seems to<br>take SMC several hours to notice these storms,<br>by which time the damage may have been done."<br>Do you know what this refers to when it's<br>talking about "event storms" or what was your   |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | A.       | affect counter before continuing with the<br>balance. Unfortunately in practice it seems to<br>take SMC several hours to notice these storms,<br>by which time the damage may have been done."<br>Do you know what this refers to when it's<br>talking about "event storms" or what was your<br>understanding at the time?   |  |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11   | A.       | affect counter before continuing with the<br>balance. Unfortunately in practice it seems to<br>take SMC several hours to notice these storms,<br>by which time the damage may have been done."<br>Do you know what this refers to when it's<br>talking about "event storms" or what was your<br>understanding at the time?<br>At the time, that would have been as I've<br>just said, my first reading of it, it would be<br>a question for Fujitsu, I'm afraid, as to what  |  |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | Q.       | affect counter before continuing with the<br>balance. Unfortunately in practice it seems to<br>take SMC several hours to notice these storms,<br>by which time the damage may have been done."<br>Do you know what this refers to when it's<br>talking about "event storms" or what was your<br>understanding at the time?<br>At the time, that would have been as I've<br>just said, my first reading of it, it would be<br>a question for Fujitsu, I'm afraid, as to what<br>an "event storm" actually is or contains. But<br>it clearly shows that Fujitsu were aware of it,<br>they'd created a Known Error Log and were<br>managing the calls, at least reactively, but<br>I don't equally remember any proactive<br>communication on the from when this was<br>originally identified.<br>Did you discuss this issue with anyone within<br>Post Office once it came to your attention?<br>No, but I think not long after this particular<br>email, I think more evidence became available to<br>me, I think three or four, maybe five post<br>offices having the same problem, for the same |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q.       | affect counter before continuing with the<br>balance. Unfortunately in practice it seems to<br>take SMC several hours to notice these storms,<br>by which time the damage may have been done."<br>Do you know what this refers to when it's<br>talking about "event storms" or what was your<br>understanding at the time?<br>At the time, that would have been as I've<br>just said, my first reading of it, it would be<br>a question for Fujitsu, I'm afraid, as to what<br>an "event storm" actually is or contains. But<br>it clearly shows that Fujitsu were aware of it,<br>they'd created a Known Error Log and were<br>managing the calls, at least reactively, but<br>I don't equally remember any proactive<br>communication on the from when this was<br>originally identified.<br>Did you discuss this issue with anyone within<br>Post Office once it came to your attention?<br>No, but I think not long after this particular<br>email, I think more evidence became available to<br>me, I think three or four, maybe five post  |  |

| 1  |                      | been parked, obviously, for quite a while in the  |
|--|----------------------|---|
| 2  |                      | backlog, if we were only going to look to fix it  |
| 3  |                      | in the S90 software release.  |
| 4  | Q.                   |   |
| 5  | -4-                  | where we went the first email we went to.   |
| 6  |                      | Callendar Square branch were initially told that  |
| 7  |                      | there was no problem in the system?   |
| 8  | Α.                   | I wouldn't say concerned until you get, you   |
| 9  |                      | know, you get the rest of the detail and then   |
| 10   |                      | you understand and then you can reflect back and  |
| 11   |                      | go, yes, you would be concerned. I think it   |
| 12   |                      | points to my earlier point around having to   |
| 13   |                      | trust, you know, the expertise in terms of the  |
| 14   |                      | advice and guidance that had been given.  |
| 15   |                      | But, again, I'll also say this was my first   |
| 16   |                      | awareness of this particular problem and this   |
| 17   |                      | particular branch experiencing this problem.  |
| 18   |                      | What had gone before, I couldn't say whether  |
| 19   |                      | that was just calls logged into the Horizon   |
| 20   |                      | Service Desk and how those had been resolved and  |
| 21   |                      | managed.  |
| 22   | Q.                   | The last paragraph of this email says:  |
| 23   |                      | "Please note that KELs tell SMC that they   |
| 24   |                      | must contact sites and warn them of balancing   |
| 25   |                      | problems if they notice the event storms caused<br>182  |
|  |                      | 102   |
|  |                      |   |
|  |                      |   |
| 1  |                      | was escalated into our problem management   |
| 2  |                      | function to get greater visibility and  |
| 2<br>3   |                      | function to get greater visibility and awareness. Prior to that additional set of   |
| 2<br>3<br>4  |                      | function to get greater visibility and<br>awareness. Prior to that additional set of<br>branches, though, I'll be honest and say that   |
| 2<br>3<br>4<br>5   |                      | function to get greater visibility and<br>awareness. Prior to that additional set of<br>branches, though, I'll be honest and say that<br>I'd accepted Liz's position, in that S90 was the   |
| 2<br>3<br>4<br>5<br>6  | 0                    | function to get greater visibility and<br>awareness. Prior to that additional set of<br>branches, though, I'll be honest and say that<br>I'd accepted Liz's position, in that S90 was the<br>fix.   |
| 2<br>3<br>4<br>5<br>6<br>7   | Q.                   | function to get greater visibility and<br>awareness. Prior to that additional set of<br>branches, though, I'll be honest and say that<br>I'd accepted Liz's position, in that S90 was the<br>fix.<br>In any of the conversations you'd had with   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | Q.                   | function to get greater visibility and<br>awareness. Prior to that additional set of<br>branches, though, I'll be honest and say that<br>I'd accepted Liz's position, in that S90 was the<br>fix.<br>In any of the conversations you'd had with<br>anyone in Post Office about this, were you aware   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | Q.                   | function to get greater visibility and<br>awareness. Prior to that additional set of<br>branches, though, I'll be honest and say that<br>I'd accepted Liz's position, in that S90 was the<br>fix.<br>In any of the conversations you'd had with<br>anyone in Post Office about this, were you aware<br>of anyone in Post Office who was aware of this   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | ч.                   | function to get greater visibility and<br>awareness. Prior to that additional set of<br>branches, though, I'll be honest and say that<br>I'd accepted Liz's position, in that S90 was the<br>fix.<br>In any of the conversations you'd had with<br>anyone in Post Office about this, were you aware<br>of anyone in Post Office who was aware of this<br>problem before   |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   | ч.                   | function to get greater visibility and<br>awareness. Prior to that additional set of<br>branches, though, I'll be honest and say that<br>I'd accepted Liz's position, in that S90 was the<br>fix.<br>In any of the conversations you'd had with<br>anyone in Post Office about this, were you aware<br>of anyone in Post Office who was aware of this<br>problem before<br>No. Personally, no. I find it had to sit here  |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | а.<br>А.<br>Q.<br>А. | function to get greater visibility and<br>awareness. Prior to that additional set of<br>branches, though, I'll be honest and say that<br>I'd accepted Liz's position, in that S90 was the<br>fix.<br>In any of the conversations you'd had with<br>anyone in Post Office about this, were you aware<br>of anyone in Post Office who was aware of this<br>problem before<br>No. Personally, no. I find it had to sit here<br>and believe that no one did know but personally,<br>no, I didn't know.<br>What steps were taken in respect of<br>communicating this issue or this bug to teams<br>outside of Problem Management?<br>I can't say, I'm afraid, what I can say is<br>I didn't communicate it further than Problem<br>Management. What happened to it beyond then,<br>I'm sorry, I couldn't say, I can't remember.<br>Do you know who was responsible for<br>communicating that outside of Problem<br>Management. |
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| 1  |                      | a decision as to whether it was communicated in  |
|--|----------------------|--|
| 2  |                      | its entirety and a warning provided to branches  |
| 3  |                      | aligned with that Fujitsu knowledge article, for   |
| 4  |                      | example, which seems to be sat, as I'm saying,   |
| 5  |                      | reactively waiting for a storm to occur and then   |
| 6  |                      | a response. I'm not sure, though, that a branch  |
| 7  |                      | would have had the ability to have noticed or  |
| 8  |                      | known what a storm was, or looked like or felt   |
| 9  |                      | like, so that, you know, may have been the most  |
| 10   |                      | appropriate response.  |
| 11   | Q.                   | , ,, ,   |
| 12   |                      | the Problem Management Team.   |
| 13   | Α.                   | Mm-hm.   |
| 14   | Q.                   | Are you aware of this issue being known about by   |
| 15   |                      | other members of the Post Office outside of that   |
| 16   |                      | Problem Management Team?   |
| 17   | A.                   | No, as I say, it was news to me so   |
| 18   | Q.                   | Sorry, after you'd discovered it?  |
| 19   | Α.                   | After I'd discovered it, no, I don't know  |
| 20   |                      | whether I can't remember what or who they  |
| 21   |                      | communicated with post raising of the problem  |
| 22<br>23   |                      | record but I would suspect, given that clearly   |
| 23<br>24   |                      | there was already awareness of it within<br>Fujitsu, and the fix cued to go out within S90,  |
| 24<br>25   |                      | that the process that's described in there just  |
| 25   |                      | 185  |
|  |                      |  |
|  |                      |  |
| 1  | •                    | I want to mayo an to a different issue. Diagoo   |
| 1  | Q.                   |  |
| 2  | Q.                   | can we open FUJ00121072. This is an email to   |
| 2<br>3   | Q.                   | can we open FUJ00121072. This is an email to you from Gareth Jenkins. Did you work with  |
| 2<br>3<br>4  |                      | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?  |
| 2<br>3<br>4<br>5   | Q.<br>A.             | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from   |
| 2<br>3<br>4<br>5<br>6  |                      | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was  |
| 2<br>3<br>4<br>5<br>6<br>7   |                      | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was<br>a rarity for Gareth to reach out to me,   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  |                      | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was<br>a rarity for Gareth to reach out to me,<br>particularly if he's copied in Mike Stewart,   |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10   | Α.                   | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was<br>a rarity for Gareth to reach out to me,<br>particularly if he's copied in Mike Stewart,<br>which would be much more likely my point of<br>contact, occasionally Anne.   |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   | A.<br>Q.             | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was<br>a rarity for Gareth to reach out to me,<br>particularly if he's copied in Mike Stewart,<br>which would be much more likely my point of<br>contact, occasionally Anne.<br>So the date is in the American form but it is<br>sent on 13 February 2007  |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   | A.<br>Q.<br>A.       | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was<br>a rarity for Gareth to reach out to me,<br>particularly if he's copied in Mike Stewart,<br>which would be much more likely my point of<br>contact, occasionally Anne.<br>So the date is in the American form but it is<br>sent on 13 February 2007<br>Yeah.<br>and it attaches a document called "Rem<br>Misbalance". If we could look at that now it's   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16   | A.<br>Q.<br>A.       | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was<br>a rarity for Gareth to reach out to me,<br>particularly if he's copied in Mike Stewart,<br>which would be much more likely my point of<br>contact, occasionally Anne.<br>So the date is in the American form but it is<br>sent on 13 February 2007<br>Yeah.<br>and it attaches a document called "Rem<br>Misbalance". If we could look at that now it's<br>FUJ00121073. Do you recall receiving this  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | A.<br>Q.<br>A.<br>Q. | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was<br>a rarity for Gareth to reach out to me,<br>particularly if he's copied in Mike Stewart,<br>which would be much more likely my point of<br>contact, occasionally Anne.<br>So the date is in the American form but it is<br>sent on 13 February 2007<br>Yeah.<br>and it attaches a document called "Rem<br>Misbalance". If we could look at that now it's<br>FUJ00121073. Do you recall receiving this<br>document at the time?   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | A.<br>Q.<br>A.<br>Q. | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was<br>a rarity for Gareth to reach out to me,<br>particularly if he's copied in Mike Stewart,<br>which would be much more likely my point of<br>contact, occasionally Anne.<br>So the date is in the American form but it is<br>sent on 13 February 2007<br>Yeah.<br>and it attaches a document called "Rem<br>Misbalance". If we could look at that now it's<br>FUJ00121073. Do you recall receiving this<br>document at the time?<br>I don't recall, no. Sorry.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | A.<br>Q.<br>A.<br>Q. | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was<br>a rarity for Gareth to reach out to me,<br>particularly if he's copied in Mike Stewart,<br>which would be much more likely my point of<br>contact, occasionally Anne.<br>So the date is in the American form but it is<br>sent on 13 February 2007<br>Yeah.<br>and it attaches a document called "Rem<br>Misbalance". If we could look at that now it's<br>FUJ00121073. Do you recall receiving this<br>document at the time?<br>I don't recall, no. Sorry.<br>It describes:  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | A.<br>Q.<br>A.<br>Q. | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was<br>a rarity for Gareth to reach out to me,<br>particularly if he's copied in Mike Stewart,<br>which would be much more likely my point of<br>contact, occasionally Anne.<br>So the date is in the American form but it is<br>sent on 13 February 2007<br>Yeah.<br>and it attaches a document called "Rem<br>Misbalance". If we could look at that now it's<br>FUJ00121073. Do you recall receiving this<br>document at the time?<br>I don't recall, no. Sorry.<br>It describes:<br>" a serious bug introduced into Live that   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | A.<br>Q.<br>A.<br>Q. | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was<br>a rarity for Gareth to reach out to me,<br>particularly if he's copied in Mike Stewart,<br>which would be much more likely my point of<br>contact, occasionally Anne.<br>So the date is in the American form but it is<br>sent on 13 February 2007<br>Yeah.<br>and it attaches a document called "Rem<br>Misbalance". If we could look at that now it's<br>FUJ00121073. Do you recall receiving this<br>document at the time?<br>I don't recall, no. Sorry.<br>It describes:<br>" a serious bug introduced into Live that<br>can result in accounts misbalancing.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | A.<br>Q.<br>A.<br>Q. | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was<br>a rarity for Gareth to reach out to me,<br>particularly if he's copied in Mike Stewart,<br>which would be much more likely my point of<br>contact, occasionally Anne.<br>So the date is in the American form but it is<br>sent on 13 February 2007<br>Yeah.<br>and it attaches a document called "Rem<br>Misbalance". If we could look at that now it's<br>FUJ00121073. Do you recall receiving this<br>document at the time?<br>I don't recall, no. Sorry.<br>It describes:<br>" a serious bug introduced into Live that<br>can result in accounts misbalancing.<br>"This bug was introduced as part of  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | A.<br>Q.<br>A.<br>Q. | can we open FUJ00121072. This is an email to<br>you from Gareth Jenkins. Did you work with<br>Gareth Jenkins often?<br>No. Gareth was sort of development level from<br>what I remember, deeply technical. It was<br>a rarity for Gareth to reach out to me,<br>particularly if he's copied in Mike Stewart,<br>which would be much more likely my point of<br>contact, occasionally Anne.<br>So the date is in the American form but it is<br>sent on 13 February 2007<br>Yeah.<br>and it attaches a document called "Rem<br>Misbalance". If we could look at that now it's<br>FUJ00121073. Do you recall receiving this<br>document at the time?<br>I don't recall, no. Sorry.<br>It describes:<br>" a serious bug introduced into Live that<br>can result in accounts misbalancing.<br>"This bug was introduced as part of<br>LFS_COUNTER 35_6 which went to a limited number |

| 1  |    | continued up to rollout of S90.                  |
|----|----|--|
| 2  | Q. | Do you think that subpostmasters should have     |
| 3  |    | been made aware of this issue?                   |
| 4  | Α. | Ideally, yes. As I say, I think the trigger is   |
| 5  |    | worrying me somewhat because I don't have        |
| 6  |    | an understanding of what "event storm" means or  |
| 7  |    | whether it would be obvious to somebody at the   |
| 8  |    | branch counter end but, ideally, I think, you    |
| 9  |    | know, as a basic principle, all branches should  |
| 10 |    | have been aware of any particular defects or     |
| 11 |    | issues that could have affected accounting.      |
| 12 | Q. | Were you involved with the handling the problem  |
| 13 |    | after initially discovering it?                  |
| 14 | Α. | l don't think I was, actually, no.               |
| 15 | Q. | Did it influence the way you thought about the   |
| 16 |    | Horizon IT System thereafter?                    |
| 17 | Α. | I think not only this but, at that time, others  |
| 18 |    | were now already more prevalent, probably for    |
| 19 |    | any number of reasons, just, you know,           |
| 20 |    | knowledge, understanding, the way that people    |
| 21 |    | were then more confident in reporting and        |
| 22 |    | reported them through the procedures. There was  |
| 23 |    | certainly an upward trend in regards to any      |
| 24 |    | number of instances where people believed        |
| 25 |    | Horizon may have caused the discrepancy.         |
|    |    | 186  |
| 1  |    | It goes on to describe the history of the        |
| 2  |    | issue. If you could go down, please, to "Basic   |
| 3  |    | Problem Effects". It says:                       |
| 4  |    | "The basic problem is when Rem Outs"             |
| 5  |    | Can you help us with what rem outs are?          |
| 6  | Α. | Sending out remittances, probably of cash rather |
| 7  |    | than stock, back to cash centres or back to the  |
| 8  |    | Swindon Stock Centre.                            |
| 9  | Q. | So it says                                       |
| 10 | Α. | Surplus.   |
| 11 | Q. | Oh, sorry?                                       |
| 12 | Α. | Sorry, surplus.                                  |
| 13 | Q. | " incorrect transactions are recorded.           |
| 14 |    | Specifically some of the Rem transactions are    |
| 15 |    | missing.   |
| 16 |    | "Take an example of 2 £500 coin bags being       |
| 17 |    | Remitted out, then the following was recorded    |

- 17 Remitted out, then the following was recorded
  18 ..."
  19 Then if we look at that table, effectively
  20 it's showing the cash out on the top line, the
  21 rem out cash is 500 when it should be 1,000.
- 22 **A.** Yeah.
- 23 Q. It says below:
- 24 "The Stock Unit will show a £500 excess cash
- 25 and a Receipts and Payments mismatch."

| 1  |    | If we can go over the page please:                |
|----|----|---|
| 2  |    | "Some branches have made a further Rem of         |
| 3  |    | £500 in an attempt to correct the situation. If   |
| 4  |    | this Pouch is subsequently Despatched, then this  |
| 5  |    | should result in the branch accounts being        |
| 6  |    | correct.  |
| 7  |    | "Note that this will result in further            |
| 8  |    | incorrect data being sent to [Post Office         |
| 9  |    | Limited] FS see discussion in section 3.2.        |
| 10 |    | "However, if this Pouch is <b>not</b> Despatched, |
| 11 |    | then the Stock Unit will balance and report       |
| 12 |    | correctly but the £500 will remain Stuck in       |
| 13 |    | Suspense."  |
| 14 |    | It goes on to say:                                |
| 15 |    | "It is recommended that all Branches are          |
| 16 |    | advised to do such a Dummy Rem and to Despatch    |
| 17 |    | the pouch to ensure that the Branch Accounts are  |
| 18 |    | clear."   |
| 19 |    | Can you just in broad terms explain what          |
| 20 |    | that advice is, the dummy rem?                    |
| 21 | Α. | Creation of a false rem, a remittance amount, to  |
| 22 |    | trigger the balance accounting being accurate,    |
| 23 |    | but it's something that it doesn't exist in       |
| 24 |    | terms of, I think, the example £500.              |
| 25 | Q. | So, in effect, redo the transaction<br>189        |
|    |    |   |
|    |    |   |

| 1  | It says:   |
|----|--|
| 2  | "As the obverse of the coin of remming in,       |
| 3  | SPMs rem out pouches of cash to be returned to   |
| 4  | the Post Office Cash Centre. A single pouch may  |
| 5  | contain multiple bags of coins or cash and each  |
| 6  | bag can only hold one denomination, and there is |
| 7  | a limit as to how much cash can be placed into   |
| 8  | a pouch. The cash can be remmed out before it    |
| 9  | is physically collected. When remmed out, the    |
| 10 | cash appears in a different line in the branch   |
| 11 | accounts. On collection, the collection team     |
| 12 | scan a barcode on the pouch and the cash is      |
| 13 | removed from the 'cash in pouches' line of       |
| 14 | accounts."                                       |
| 15 | It says:   |
| 16 | "When remming out, branches should have made     |
| 17 | one entry for each denomination and value and,   |
| 18 | if there were multiple bags for a particular     |
| 19 | denomination, the quantity of bags should have   |
| 20 | been specified in that single entry"             |
| 21 | So two times £500 of £2 coins.                   |
| 22 | "However, if the SPMs had made multiple          |
| 23 | entries for each denomination and value (eg one  |
| 24 | entry for 1 x £500 bag of £2 coins and a second  |
| 25 | entry for 1 x £500 bag of £2 coins), Horizon     |

| 1  | Α. | Yes.   |
|----|----|--|
| 2  | Q. | without sending the cash so that it balances?    |
| 3  | Α. | Correct.   |
| 4  | Q. | It says:   |
| 5  |    | "It has been agreed that POA SSC will            |
| 6  |    | contact each branch with detailed advice as      |
| 7  |    | exactly what to do."                             |
| 8  |    | Please can we now go to the technical            |
| 9  |    | appendix of the Horizon Issues judgment. It's    |
| 10 |    | POL00022841, page 52. This is the judgment of    |
| 11 |    | Mr Justice Fraser in the Group Litigation Order  |
| 12 |    | where the judge was looking at bugs, errors and  |
| 13 |    | defects in the Horizon IT System from which this |
| 14 |    | Inquiry is building on the findings.             |
| 15 | Α. | Okay.  |
| 16 | Q. | Section 6 refers to a remming out bug. If we     |
| 17 |    | could go over the page to 201, please, it says:  |
| 18 |    | "Issue 6(i) arises as follows. What is           |
| 19 |    | called 'a remming error' leads to a mismatch     |
| 20 |    | between the amounts of cash remmed out to one    |
| 21 |    | place and the amounts remmed in from another.    |
| 22 |    | The Post Office has submitted that remming       |
| 23 |    | errors are a clear violation of Data Entry       |
| 24 |    | Accounting and are picked up by Horizon. The     |
| 25 |    | two different issues are as follows."<br>190     |
| 1  |    | would only record the first bag as having left   |

| 1  |    | would only record the first bag as having left   |
|----|----|--|
| 2  |    | the branch's cash holdings, but all of the bags  |
| 3  |    | would show on the 'cash in pouches' line. This   |
| 4  |    | would have created a discrepancy in the branch   |
| 5  |    | accounts because all of the cash would have been |
| 6  |    | collected."                                      |
| 7  |    | Is this the bug that you were dealing with,      |
| 8  |    | with Gareth Jenkins in February.                 |
| 9  | Α. | I can't be absolutely certain but it's certainly |
| 10 |    | reads and appears to be, yes.                    |
| 11 | Q. | So, in essence, the problem in lay terms is two  |
| 12 |    | pouches, say, of £500 are sent to the cash       |
| 13 |    | centre but Horizon only logs that one has been   |
| 14 |    | sent?  |
| 15 | Α. | Yes.   |
| 16 | Q. | So Horizon records that there is an additional   |
| 17 |    | £500, which isn't actually there?                |
| 18 | Α. | Correct.   |
| 19 | Q. | Can we please go to FUJ00120587. This is         |
| 20 |    | a Known Error Log, "KEL acha508S" and you see    |
| 21 |    | it's created on 12 February 2007 or raised then, |
| 22 |    | so at the time this was made this issue was      |
| 23 |    | being dealt with, and last updated on            |
| 24 |    | 15 February 2007. We see from the "Symptoms"     |
| 25 |    | that we are referring here to this bug.<br>192   |

| 1   | Α.                   | Yes.  | 1  |                                  |
|---|----------------------|---|--|----------------------------------|
| 2   | Q.                   | Please can we go down to the bottom section. It   | 2  |                                  |
| 3   |                      | says:   | 3  |                                  |
| 4   |                      | "Calls about inconsistencies in stock rem   | 4  |                                  |
| 5   |                      | outs should be redirected to NBSC. SSC have   | 5  |                                  |
| 6   |                      | contacted all branches who have had a problem   | 6  |                                  |
| 7   |                      | with cash rem outs, quoting ref PC143435."  | 7  |                                  |
| 8   |                      | Is it the position then at this stage, on   | 8  |                                  |
| 9   |                      | 15 February, the SSC had called the branches or   | 9  |                                  |
| 10  |                      | contacted the branches where there was  | 10   |                                  |
| 11  |                      | a discrepancy arising from this bug and sought  | 11   |                                  |
| 12  |                      | to deal with it.  | 12   |                                  |
| 13  | Α.                   | That's how I'm reading that, yes, that they've  | 13   |                                  |
| 14  |                      | called the ones that have been identified.  | 14   |                                  |
| 15  | Q.                   | Please can we turn now to FUJ00121071 and turn  | 15   |                                  |
| 16  |                      | to page 3 at the very bottom. We see your name  | 16   |                                  |
| 17  |                      | at the bottom.  | 17   |                                  |
| 18  | Α.                   | Yes.  | 18   |                                  |
| 19  | Q.                   | An email on 15 February. If we can go over the  | 19   |                                  |
| 20  |                      | page to see the content of that email. The  | 20   |                                  |
| 21  |                      | subject is "T30 Release Impact on Stock   | 21   |                                  |
| 22  |                      | Rems Monday 12th February". You say:  | 22   | Α.                               |
| 23  |                      | "Scenario:  | 23   | Q.                               |
| 24  |                      | "Whilst the T30 release was out in the  | 24   |                                  |
| 25  |                      | branch network, Monday 12th Feb only for all bar<br>193   | 25   |                                  |
|   |                      |   |  |                                  |
| 1   |                      | unknown if there's a discrepancy?   | 1  | Α.                               |
| 2   | Α.                   | Yes.  | 2  | Q.                               |
| 3   | Q.                   | In terms of "Next Steps" you say:   | 3  |                                  |
| 4   |                      | "Identify which of those branches have  | 4  |                                  |
| 5   |                      | a discrepancy between Horizon and the rem   |  |                                  |
|   |                      |   | 5  | Α.                               |
| 6   |                      | slip Options here are to contact the branches   | 6  | A.<br>Q.                         |
| 6<br>7  |                      |   |  |                                  |
|   |                      | slip Options here are to contact the branches   | 6  |                                  |
| 7   |                      | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,   | 6<br>7   | Q.                               |
| 7<br>8<br>9<br>10   |                      | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to   | 6<br>7<br>8<br>9<br>10   | Q.<br>A.                         |
| 7<br>8<br>9<br>10<br>11   |                      | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had   | 6<br>7<br>8<br>9<br>10<br>11   | Q.<br>A.                         |
| 7<br>8<br>9<br>10   |                      | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had<br>already contacted in the KEL we'd referred to?   | 6<br>7<br>8<br>9<br>10   | Q.<br>A.                         |
| 7<br>8<br>9<br>10<br>11   | А.                   | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had   | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13   | Q.<br>A.                         |
| 7<br>8<br>9<br>10<br>11<br>12   | А.                   | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had<br>already contacted in the KEL we'd referred to?<br>I can't actually remember but that's the way<br>I am reading this yes, that they're additional.  | 6<br>7<br>8<br>9<br>10<br>11   | Q.<br>A.<br>Q.                   |
| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   | A.<br>Q.             | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had<br>already contacted in the KEL we'd referred to?<br>I can't actually remember but that's the way<br>I am reading this yes, that they're additional.<br>In respect of these branches, there's   | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15   | Q.<br>A.<br>Q.                   |
| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16   |                      | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had<br>already contacted in the KEL we'd referred to?<br>I can't actually remember but that's the way<br>I am reading this yes, that they're additional.<br>In respect of these branches, there's<br>essentially two options, is it fair: one is  | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16   | Q.<br>A.<br>Q.                   |
| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     |                      | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had<br>already contacted in the KEL we'd referred to?<br>I can't actually remember but that's the way<br>I am reading this yes, that they're additional.<br>In respect of these branches, there's<br>essentially two options, is it fair: one is<br>a proactive approach of contacting those  | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | Q.<br>A.<br>Q.                   |
| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16   |                      | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had<br>already contacted in the KEL we'd referred to?<br>I can't actually remember but that's the way<br>I am reading this yes, that they're additional.<br>In respect of these branches, there's<br>essentially two options, is it fair: one is  | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | Q.<br>A.<br>Q.<br>A.<br>Q.       |
| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | Q.<br>A.             | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had<br>already contacted in the KEL we'd referred to?<br>I can't actually remember but that's the way<br>I am reading this yes, that they're additional.<br>In respect of these branches, there's<br>essentially two options, is it fair: one is<br>a proactive approach of contacting those<br>branches to advise them of the issue<br>Yes.  | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | Q.<br>A.<br>Q.<br>A.<br>Q.       |
| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | Q.                   | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had<br>already contacted in the KEL we'd referred to?<br>I can't actually remember but that's the way<br>I am reading this yes, that they're additional.<br>In respect of these branches, there's<br>essentially two options, is it fair: one is<br>a proactive approach of contacting those<br>branches to advise them of the issue<br>Yes.<br>and the second is to wait for calls to come   | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | Q.<br>A.<br>Q.<br>A.<br>Q.       |
| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | Q.<br>A.<br>Q.       | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had<br>already contacted in the KEL we'd referred to?<br>I can't actually remember but that's the way<br>I am reading this yes, that they're additional.<br>In respect of these branches, there's<br>essentially two options, is it fair: one is<br>a proactive approach of contacting those<br>branches to advise them of the issue<br>Yes.<br>and the second is to wait for calls to come<br>into the NBSC; do you accept that?   | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | Q.<br>A.<br>Q.<br>A.<br>Q.       |
| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Q.<br>A.<br>Q.<br>A. | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had<br>already contacted in the KEL we'd referred to?<br>I can't actually remember but that's the way<br>I am reading this yes, that they're additional.<br>In respect of these branches, there's<br>essentially two options, is it fair: one is<br>a proactive approach of contacting those<br>branches to advise them of the issue<br>Yes.<br>and the second is to wait for calls to come<br>into the NBSC; do you accept that?<br>Yes.                                       | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Q.<br>A.<br>Q.<br>A.<br>Q.<br>A. |
| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | Q.<br>A.<br>Q.       | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had<br>already contacted in the KEL we'd referred to?<br>I can't actually remember but that's the way<br>I am reading this yes, that they're additional.<br>In respect of these branches, there's<br>essentially two options, is it fair: one is<br>a proactive approach of contacting those<br>branches to advise them of the issue<br>Yes.<br>and the second is to wait for calls to come<br>into the NBSC; do you accept that?<br>Yes.<br>Thank you. Now, at this stage, the | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | Q.<br>A.<br>Q.<br>A.<br>Q.       |
| 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Q.<br>A.<br>Q.<br>A. | slip Options here are to contact the branches<br>or wait and react to calls made into NBSC,<br>HSD I will then arrange a conference call to<br>discuss way forward tomorrow"<br>So is it fair to say that these 570 branches<br>are different to the branches the SSC had<br>already contacted in the KEL we'd referred to?<br>I can't actually remember but that's the way<br>I am reading this yes, that they're additional.<br>In respect of these branches, there's<br>essentially two options, is it fair: one is<br>a proactive approach of contacting those<br>branches to advise them of the issue<br>Yes.<br>and the second is to wait for calls to come<br>into the NBSC; do you accept that?<br>Yes.                                       | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Q.<br>A.<br>Q.<br>A.<br>Q.<br>A. |

| 1      |          | 120 branches that were incommunicado during the   |
|--------|----------|---|
| 2      |          | initial regression progress. We have              |
| 3      |          | a potential situation where a branch completing   |
| 4      |          | the stock rem out [so that's the cash going out   |
| 5      |          | to the cash centre] on that day could have        |
| 6      |          | a discrepancy due to the fact that not all stock  |
| 7      |          | physically returned by the branch may have been   |
| 8      |          | deducted from Horizon from the stock on hand      |
| 9      |          | table, this despite the fact that the rem slip    |
| 10     |          | produced matched the physical stock returned."    |
| 11     |          | You then say under "Latest position":             |
| 12     |          | "We have a possible 570 branches that were        |
| 13     |          | affected by last weekend's T30 release, now       |
| 14     |          | regressed.  |
| 15     |          | "The pouch IDs have been identified by            |
| 16     |          | Fujitsu.  |
| 17     |          | "The branches who sent those pouches have         |
| 18     |          | also been identified, and the value of the stock  |
| 19     |          | returned from each has been established from the  |
| 20     |          | POC file."  |
| 21     |          | Do you know what the POC file is?                 |
| 22     | Α.       | I'm sorry, I don't remember.                      |
| 23     | Q.       | "We still don't know which of these branches has  |
| 24     |          | actually got a discrepancy due to the problem."   |
| 25     |          | So these are potentially affected branches,       |
|        |          | 194   |
|        |          |   |
| 1      | A.       | Correct.  |
| 2      | Q.       | A subpostmaster would only be aware of the issue  |
| 3      |          | in balancing when they came to balance the stock  |
| 4      |          | unit?   |
| 5      | A.       | Correct.  |
| 6<br>7 | Q.       | Again, this could be some time after remming      |
| 7      |          | out?  |
| 8      | A.       | It could.   |
| 9      | Q.       | So, again, it's another example of when           |
| 10     |          | a subpostmaster may have thought that             |
| 11     |          | discrepancy on balancing was caused by            |
| 12     |          | a mistake?  |
| 13     | A.       | Yes.  |
| 14     | Q.       | They had no reason to believe, if they're not     |
| 15     |          | told, that it was due to a bug, error or defect   |
| 16     |          | in the Horizon IT System?                         |
| 17     | Α.       | That's also correct.                              |
| 18     | Q.       | Please can we go to page 3. It's quite            |
| 19     |          | confusing the way this email is set out, but you  |
| 20     |          | see halfway down there's an email from Dave       |
| 21     |          | Hulbert, 5 February 2007                          |
|        |          |   |
| 22     | A.       | Yeah.   |
| 23     | A.<br>Q. | Yeah.<br>forwarding on your email to Andy McLean. |
|        |          | Yeah.   |

| 1        | Α. | My line manager at the time.                     | 1        |    | Horiz        |
|----------|----|--|----------|----|--------------|
| 2        | Q. | And Andy McLean?                                 | 2        |    | syste        |
| 3        | Α. | His line manager.                                | 3        |    | here         |
| 4        | Q. | It says:   | 4        |    | huma         |
| 5        |    | "Andy  | 5        |    | discr        |
| 6        |    | "See update below.                               | 6        | Q. | But i        |
| 7        |    | "Not much progress today. The dilemma for        | 7        |    | case         |
| 8        |    | Gary is approaching branches is proactive but    | 8        | Α. | Ther         |
| 9        |    | opens the risk of litigation in future ie we're  | 9        | Q. | tha          |
| 10       |    | telling 570 branches that Horizon may have       | 10       | Α. | Yes.         |
| 11       |    | caused a discrepancy low risk but a risk         | 11       | Q. | an           |
| 12       |    | being reactive doesn't feel right as we've       | 12       |    | not ta       |
| 13       |    | caused the problem for branches but this may be  | 13       |    | rease        |
| 14       |    | the right option in this situation."             | 14       | Α. | Yes.         |
| 15       |    | To what extent was the risk of litigation        | 15       | Q. | The          |
| 16       |    | taken into account at the Post Office at this    | 16       |    | some         |
| 17       |    | time when deciding how to handle a known bug,    | 17       |    | caus         |
| 18       |    | error or defect?                                 | 18       | Α. | Abso         |
| 19       | Α. | It's possibly more of a question for David and   | 19       | Q. | wh           |
| 20       |    | Andy. My reason for escalating this, obviously   | 20       | Α. | lt wa        |
| 21       |    | beyond the seriousness of the situation, is just | 21       | Q. | Wha          |
| 22       |    | a growing awareness of the volume of defect or   | 22       | -  | it?          |
| 23       |    | bug related calls and enquiries that we were     | 23       | Α. | lt's d       |
| 24       |    | undertaking. But also very aware that the        | 24       |    | man          |
| 25       |    | mantra and message was still "There are no       | 25       |    | cours        |
|          |    | 197  |          |    |              |
|          |    |  |          |    |              |
| 1        |    | uncomfortable. It's uncomfortable reading today  | 1        |    | value        |
| 2        |    | and it was uncomfortable reading then.           | 2        |    | bran         |
| 3        | 0  | Was this reflective of a broader culture in the  | 3        |    | find o       |
| 4        | ۰. | Post Office at the time, that Horizon shouldn't  | 4        |    | the s        |
| 5        |    | have been challenged?                            | 5        |    | one          |
| 6        | Α. | • • • • • • • •                                  | 6        |    | 0110         |
| 7        |    | messages but, absolutely, on the basis that      | 7        |    |              |
| ,<br>8   |    | there was no accepted agreement, that there was  | 8        | Α. | Roll i       |
| 9        |    | Horizon integrity issues, that was the general   | 9        | Α. | told t       |
| 9<br>10  |    | culture and that is what drove the behaviour.    | 9<br>10  |    |              |
| 11       | Q. |  | 10       |    | was a them   |
| 12       | ω. | the bottom you email I think it looks like       | 12       |    |              |
| 12       |    | you email Dave Hulbert and Andy McLean?          | 12       |    | impa<br>with |
| 13       | Α. | Yes.   | 13       |    |              |
|          |    |  |          |    | an o         |
| 15<br>16 | Q. | You say:<br>"Bad news.                           | 15<br>16 |    | see t        |
|          |    |  |          |    | and I        |
| 17       |    | "On further investigation today we have          | 17       |    | this t       |
| 18       |    | established that the POC file actually matches   | 18       |    | well,        |
| 19       |    | POL-FS."   | 19       |    |              |
| 20       |    | What does that mean?                             | 20       |    | reac         |
| 21       | Α. | It meant that we still didn't and couldn't       | 21       |    | abse         |
| 22       |    | identify the values or the branches involved in  | 22       |    | that t       |
| 23       | ~  | this particular issue.                           | 23       |    | some         |
| 24       | Q. | It says:   | 24       | ~  | resol        |
| 25       |    | "This means that we still don't know what<br>199 | 25       | Q. | You          |
|          |    | 100  |          |    |              |

| 1  |    | Horizon integrity issues and there are no        |
|----|----|--|
| 2  |    | systemic issues that cause problems", and yet    |
| 3  |    | here's clearly an example, whether driven by     |
| 4  |    | human error or not, that was creating            |
| 5  | -  | discrepancies in branch.                         |
| 6  | Q. | But in this case it's right to say in this       |
| 7  | _  | case there was a known error                     |
| 8  | Α. | There was, in this instance a known error, yes.  |
| 9  | Q. | that caused discrepancies                        |
| 10 | Α. | Yes.   |
| 11 | Q. | and your line manager is suggesting here of      |
| 12 |    | not taking a proactive approach, and one of the  |
| 13 |    | reasons given is the risk of litigation?         |
| 14 | Α. | Yes.   |
| 15 | Q. | The risk of that litigation presumably is that   |
| 16 |    | someone will turn round and say, "Horizon is     |
| 17 |    | causing discrepancies"                           |
| 18 | Α. | Absolutely.                                      |
| 19 | Q. | which, in fact, it was in this case?             |
| 20 | Α. | It was.  |
| 21 | Q. | What did you think to this email when you saw    |
| 22 |    | it?  |
| 23 | Α. | It's different because now I'm in a position     |
| 24 |    | many years later where I'm reflecting on it, of  |
| 25 |    | course with the benefit of hindsight. But it's   |
|    |    | 198  |
|    |    |  |
| 1  |    | value stock has been returned by these 570       |
| 2  |    | branches. Furthermore the only way we could      |
| 3  |    | find out would be for someone at Swindon to find |
| 4  |    | the specific pouches and physically open each    |
| 5  |    | one and count the stock.                         |
| 6  |    | "This rules out a proactive recovery plan."      |
| 7  |    | Do you still agree with that?                    |
| 8  | Α. | Roll it out in the sense that what would we have |
| 9  |    | told the branch? We could have told them there   |
| 10 |    | was a problem but nothing more. Couldn't give    |
| 11 |    | them any indication of to the extent of          |
| 12 |    | impact that it had had on them. But, actually,   |
| 13 |    | with hindsight, there would have been            |
| 14 |    | an opportunity to, I think, have well, I can     |
| 15 |    | see that throughout the email chain that Product |
| 16 |    | and Branch Accounting have been included within  |
| 17 |    | this because they would have been seeing as      |
| 18 |    | well, the outcome and the impact of this.        |
| 19 |    | There was clearly an opportunity to have         |
| 20 |    | reached out to the 570 branches, even in the     |
| 21 |    | absence of detail and values, and inform them so |
| 22 |    | that they were aware so that we could have done  |
| 23 |    | something more collaborative with them to        |
| 24 |    | resolve the issue.                               |
| 25 | Q. | You go on to say that:                           |
| 20 |    |  |

| 1  |          | "I have ensured that both NBSC and HSD have  |
|--|----------|--|
| 2  |          | scripts to deal with any queries relating to   |
| 3  |          | stock from these branches."  |
| 4  |          | So that's if someone rings in.   |
| 5  | Α.       | That's that reactive process again and that  |
| 6  |          | script again, to make sure that they catch it  |
| 7  |          | and the branch is recompensed and the correction   |
| 8  |          | made.  |
| 9  | Q.       | The Inquiry hasn't seen or had sight of that   |
| 10   |          | script. Do you know where those scripts would  |
| 11   |          | usually be held or stored? Was it on the Remedy  |
| 12   |          | system as well?  |
| 13   | Α.       | Given the temporary nature, I'm not sure whether   |
| 14   |          | they were uploaded digitally or not, actually.   |
| 15   |          | But if they were anywhere, it would be Network   |
| 16   |          | Business Support Centre environment.   |
| 17   | Q.       | If we can move on to another issue, please, and  |
| 18   |          | that's a PEAK that you refer to in your witness  |
| 19   |          | statement. It's POL0001313. Before the Inquiry   |
| 20   |          | sent you a document like this, had you seen one  |
| 21   |          | of these before, a PEAK?   |
| 22   | Α.       | Yes, occasionally. I can't remember what the   |
| 23   |          | PEAK acronym sort of means but I think it  |
| 24   |          | relates to Fujitsu's internal tool or system for   |
| 25   |          | recording bugs and defects that needed to be   |
|  |          | 201  |
|  |          |  |
|  |          |  |
| 1  | ^        | Not an expert I'm afraid, on the issues  |
| 1  | Α.       | Not an expert, I'm afraid, on the issues   |
| 2  | Α.       | management process but I think that this would   |
| 2<br>3   | Α.       | management process but I think that this would have been communicated to Product and Branch  |
| 2<br>3<br>4  | Α.       | management process but I think that this would<br>have been communicated to Product and Branch<br>Accounting. It's not something that they'd have  |
| 2<br>3<br>4<br>5   | Α.       | management process but I think that this would<br>have been communicated to Product and Branch<br>Accounting. It's not something that they'd have<br>been looking for support from incident  |
| 2<br>3<br>4<br>5<br>6  | Α.       | management process but I think that this would<br>have been communicated to Product and Branch<br>Accounting. It's not something that they'd have<br>been looking for support from incident<br>management with and I'm afraid I have no  |
| 2<br>3<br>4<br>5<br>6<br>7   | Α.       | management process but I think that this would<br>have been communicated to Product and Branch<br>Accounting. It's not something that they'd have<br>been looking for support from incident<br>management with and I'm afraid I have no<br>recollection at all what the acronym "EDSC"   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  |          | management process but I think that this would<br>have been communicated to Product and Branch<br>Accounting. It's not something that they'd have<br>been looking for support from incident<br>management with and I'm afraid I have no<br>recollection at all what the acronym "EDSC"<br>means.   |
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| 1       |    | queued in a backlog then for fix. If there was   |
|---------|----|--|
| 2       |    | any reason for somebody like Anne Chambers   |
| 3       |    | I think it is Anne in this instance, isn't it  |
| 4       |    | to make me aware of that, I suspect it was   |
| 5       |    | probably attached to the email explaining to me,                                       |
| 6<br>7  |    | hopefully in simple terms, why I was being   |
| 7       | ~  | informed.  |
| 8<br>9  | Q. | This says, issue at Branch 106129, which has a non-zero trading position. The entry on |
| 10      |    | 18 February at 1500 hours, just go down  |
| 11      |    | slightly:  |
| 12      |    | "Branch 10629 appears to have been affected  |
| 13      |    | by a known software problem which causes   |
| 14      |    | a non-zero trading position, a receipts and  |
| 15      |    | payments mismatch and an incorrect discrepancy."                                       |
| 16      |    | Further down on 25 February, we see that you   |
| 17      |    | were notified of this problem. Do you have any   |
| 18      |    | independent recollection of that?  |
| 19      | Α. | I'm afraid not, no.  |
| 20      | Q. | Over the page, again on 25 February, it says:  |
| 21      |    | "Thanks, Anne. Final BIMS issued to POL  |
| 22      |    | including 'Information for BIMS' text.   |
| 23      |    | Returning call to EDSC for closure."   |
| 24      |    | Can you assist with what that means in terms   |
| 25      |    | of the "final BIMS issue to POL"?  |
|         |    | 202  |
|         |    |  |
| 1       |    | Do you understand broadly what this problem was?                                       |
| 2       | Α. | I don't. It's too technical for me but,  |
| 3       |    | fundamentally, it's describing another software  |
| 4       |    | related, application related issue that's  |
| 5       | ~  | created a discrepancy in the branch.   |
| 6       | Q. | It refers to OCP17510, which has been raised.  |
| 7       |    | Do you remember what an OCP was?<br>Operational Change Process or Procedure or         |
| 8<br>9  | Α. | something like that, I think. It was the audit   |
| 9<br>10 |    | trail that was created to match with whatever  |
| 11      |    | action was being taken, so that that 17510   |
| 12      |    | should match whatever correction activities, so  |
| 13      |    | whether that's message store or otherwise, was   |
| 14      |    | done to make this right.   |
| 15      | Q. | So when you say "message store", do you mean   |
| 16      |    | where Fujitsu were making changes  |
| 17      | Α. | The way Fujitsu went into the system to correct  |
| 18      |    | the issue.   |
| 19      | Q. | The OCP was the  |
| 20      | Α. | And the OCP was the audit trail for that   |
| 21      |    | activity, yeah.  |
| 22      | Q. | Do you recall, from your recollection, what were                                       |
| 23      |    | the controls, the security controls, on the use  |
| 24      |    | of OCP?  |
| 25      | Α. | I don't. I mean, I would have seen plenty in my  |
|         |    | 204  |
|         |    |  |

| 1  |    | time for both awareness and, on occasions,       |
|----|----|--|
| 2  |    | approval but I don't really remember, I'm        |
| 3  |    | afraid, the process, quite how we raised them,   |
| 4  |    | how they were triggered. I think we just had     |
| 5  |    | an approval or sight of within my team.          |
| 6  | Q. | Can we look at the OCP. It's FUJ00087194. So     |
| 7  |    | we see "Write corrective bureau message" for the |
| 8  |    | branch. It says:                                 |
| 9  |    | "A single SC message was written in              |
| 10 |    | error on 26th November selling 1,000 US          |
| 11 |    | dollars, with no corresponding settlement line.  |
| 12 |    | To remove the effects of this message at both    |
| 13 |    | the branch and on POL-FS, we will insert a new   |
| 14 |    | message to negate the effects of the original    |
| 15 |    | message."  |
| 16 |    | So is your understanding of this that what       |
| 17 |    | Fujitsu would do is insert, essentially,         |
| 18 |    | a transaction into the branch accounts?          |
| 19 | Α. | To balance the books, yes, and an accepted       |
| 20 |    | process as well. I know this is just one         |
| 21 |    | example but that would be what I'd expect to     |
| 22 |    | happen in these circumstances.                   |
| 23 | Q. | When were you first aware of Fujitsu's ability   |
| 24 |    | to   |
| 25 | Α. | Oh.  |
|    |    | 205  |
|    |    |  |
| 1  |    | sorry, not that far. Sorry, just a little        |
| 2  |    | further up. Thank you. We refer to extra         |
| 3  |    | detail and it gives the original message and the |
|    |    |  |

- 4 new message attributes. Do those -- I mean,
  5 from your position, you say you're
- 6 non-technical, do those words mean anything to
- 7 you, insofar as could you challenge them or
- 8 check they're accurate?
- 9 A. No. You know, it's -- I would always work, my
- 10 team would always work, based upon the business
- 11 outcome element of the -- any given situation.
- 12 So for me, really simply, this is about
- 13 rectifying correctly for a branch a situation
- 14 which is not of their making.
- 15 **Q.** So it says at the bottom there:
- 16 "Gary Blackburn (POL) is already aware of17 this issue."
- 18 **A.** Yes.

- 19 **Q.** If we go down, there's an email, which you
- 20 aren't in copy for, but it says:
- 21 "Hi Gaby,
- 22 "POL approve this change.
- 23 "As soon as I saw the branch name,
- 24 I realised that this is the one that Gary spoke
  - to Anne Chambers about earlier."
    - 207

- 1 Q. -- insert transactions like this?
- 2 A. I don't know but I'm -- I'm going to say
- 3 probably HNG-X rather than Legacy Horizon, so4 much later on.
- 5 **Q.** Well, we're here in 2007.
- 6 A. Oh, right, okay.
- 7 Q. Horizon Online is 2010 onwards.
- 8 **A.** Yes, so -- but I still -- I'm afraid I don't
- 9 know. It's not something that you were
- 10 particularly conscious of at the time or that it
- 11 maybe particularly concerned you or felt wrong
- 12 in any kind of way, if I can -- I can't find
- 13 a way to articulate it. It felt part of a BAU
- 14 process from an internal operational
- 15 perspective.
- 16  $\,$  Q. Were you aware of any ability of Fujitsu to
- 17 insert, edit or delete transactions from the
- 18 branch accounts outside of the OCP procedure?
- 19 A. Oh, no. I'd have always expected there to have
- 20 been communication with Post Office and, if it
- 21 was making a correction, OCP was -- I was going
- 22 to say the only -- there may have been another
- but that was a process for audit trailingamendments that were being made
- 24 amendments that were being made.

# 25 **Q.** If we can go down to the bottom of this OCP, \$206\$

- 1 Α. Yes. 2 Q. So, at this time, you were relying on Fujitsu to 3 implement the change and no one at Post Office was checking it from a technical perspective? 4 5 Not from my perspective and, as I've said, I and Α. 6 my team, of which Julie Edgley was one at the 7 time, would not have had that ability, so it's 8 going on the advice, the guidance given. 9 Q. Would you have told or arranged for the 10 subpostmaster to be told of this change? A. I don't remember doing so. I really would like 11 12 to sit here today and be able to say to you that 13 we did, it is possible that we did. We spoke 14 to -- and I, through all my years, spoke to many 15 subpostmasters but I really cannot say that 16 I did on this occasion. 17 In general terms, when you had these types of Q. 18 transactions, would you --19 In general terms, yes. Naturally, we would want Α. 20 to ensure that the postmaster was aware because 21 there was an issue of awareness and timing of,
- 22 because it would become apparent to them because
- an entry was being made. I think there might be
- 24 a different example within the pack where we
- 25 have actually recorded an email that we've spoke 208

| 1  |                      | to a particular postmaster but I can't remember  |
|--|----------------------|--|
| 2  |                      | this particular example.   |
| 3  | Q.                   | If we could go back to the PEAK we looked at   |
| 4  |                      | before, it's POL00023765, and to page 3.   |
| 5  |                      | 14 December, the entry at 15.37 says:  |
| 6  |                      | "Email to Gary Blackburn."   |
| 7  |                      | The Inquiry doesn't have or hasn't had sight   |
| 8  |                      | of that email but the following entry says this:   |
| 9  |                      | "The counter problem which caused the first  |
| 10   |                      | issue has been corrected by inserting a message  |
| 11   |                      | into the message store, for equal but opposite   |
| 12   |                      | values/quantities, as agreed with POL (OCP   |
| 13   |                      | 17510)."   |
| 14   |                      | Which was the document we just went to.  |
| 15   | Α.                   |  |
| 16   | Q.                   | "As a result of this corrective action, the net  |
| 17   |                      | effect on POL-FS is zero, and the POL-FS figures   |
| 18   |                      | are in line with the branch. POL-MIS received  |
| 19   |                      | both the original message and the corrective   |
| 20   |                      | message.   |
| 21   |                      | "Once the problem was corrected, there   |
| 22   |                      | should have been no impact on the branch.  |
| 23   |                      | However it has been noted that the stock unit  |
| 24   |                      | BDC had a loss of \$1,000, which was generated   |
| 25   |                      | after the correction was made. We have already 209   |
|  |                      | 200  |
|  |                      |  |
| 4  |                      |  |
| 1  |                      | Office interpreted its contract with   |
| 2  |                      | subpostmasters at the time, that a discrepancy   |
| 2<br>3   |                      | subpostmasters at the time, that a discrepancy for which there wasn't a system explanation, the  |
| 2<br>3<br>4  |                      | subpostmasters at the time, that a discrepancy<br>for which there wasn't a system explanation, the<br>subpostmaster would have been expected to make   |
| 2<br>3<br>4<br>5   | ^                    | subpostmasters at the time, that a discrepancy<br>for which there wasn't a system explanation, the<br>subpostmaster would have been expected to make<br>good that discrepancy?   |
| 2<br>3<br>4<br>5<br>6  | Α.                   | subpostmasters at the time, that a discrepancy<br>for which there wasn't a system explanation, the<br>subpostmaster would have been expected to make<br>good that discrepancy?<br>That would be my understanding, yes.   |
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| 1  |                            | notified Gary Blackburn at POL (email attached).  |
|--|----------------------------|---|
| 2  |                            | This appears to be a genuine loss at the branch,  |
| 3  |                            | not a consequence of the problem or correction."  |
| 4  |                            | Do you recall being made aware of this?   |
| 5  | Α.                         | I don't. But clearly I was.   |
| 6  | Q.                         | Is it a fair summary to say what Anne Chambers  |
| 7  |                            | is effectively saying here is there was   |
| 8  |                            | initially a problem which caused a \$1,000  |
| 9  |                            | discrepancy?  |
| 10   | Α.                         | Yeah.   |
| 11   | Q.                         | They inserted a transaction to try to correct   |
| 12   |                            | that, so a \$1,000 transaction the other way, and   |
| 13   |                            | now there was a \$1,000 loss to the branch, which   |
| 14   |                            | they were saying was unrelated to the use of the  |
| 15   |                            | remote access. Does that strike you as odd?   |
| 16   | Α.                         | Yes.  |
| 17   | Q.                         | There's no record in this PEAK of this being  |
| 18   |                            | challenged at the time. Do you think you would  |
| 19   |                            | have challenged it?   |
| 20   | Α.                         | I'd like to think so but, again, you know,  |
| 21   |                            | passage of time, I honestly it isn't  |
| 22   |                            | something that I remember, but, you know,   |
| 23   |                            | clearly \$1,000 is a trigger there to say too   |
| 24   |                            | much of a coincidence.  |
| 25   | Q.                         | It's correct, isn't it, that under the way Post   |
|  |                            | 210   |
|  |                            |   |
|  |                            |   |
| 1  |                            | audit data that showed what keystrokes had been   |
| 1  |                            | audit data that showed what keystrokes had been   |
| 2  | Δ                          | held in branch?   |
| 2<br>3   | A.<br>0                    | held in branch?<br>Yes, that was my understanding yes.  |
| 2<br>3<br>4  | A.<br>Q.                   | held in branch?<br>Yes, that was my understanding yes.<br>How often did you request such data or see such   |
| 2<br>3<br>4<br>5   | Q.                         | held in branch?<br>Yes, that was my understanding yes.<br>How often did you request such data or see such<br>data?  |
| 2<br>3<br>4<br>5<br>6  |                            | held in branch?<br>Yes, that was my understanding yes.<br>How often did you request such data or see such<br>data?<br>Possibly once or twice with post offices that   |
| 2<br>3<br>4<br>5<br>6<br>7   | Q.                         | held in branch?<br>Yes, that was my understanding yes.<br>How often did you request such data or see such<br>data?<br>Possibly once or twice with post offices that<br>were in this kind of scenario. I'm not saying  |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | Q.<br>A.<br>Q.             | held in branch?<br>Yes, that was my understanding yes.<br>How often did you request such data or see such<br>data?<br>Possibly once or twice with post offices that<br>were in this kind of scenario. I'm not saying<br>the same particular trigger that were disputing<br>discrepancies. I do remember it was actually<br>through the BIM process, through Nick Crow, that<br>it had been requested to try to prove or<br>disprove a sequence of events that might have<br>explained whether it was system driven or user<br>driven.<br>So you say you use it two to three<br>I think a couple of occasions, only a couple of<br>occasions where there was really quite difficult<br>protracted enquiries and investigations. I'm  |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | Q.<br>A.<br>Q.             | held in branch?<br>Yes, that was my understanding yes.<br>How often did you request such data or see such<br>data?<br>Possibly once or twice with post offices that<br>were in this kind of scenario. I'm not saying<br>the same particular trigger that were disputing<br>discrepancies. I do remember it was actually<br>through the BIM process, through Nick Crow, that<br>it had been requested to try to prove or<br>disprove a sequence of events that might have<br>explained whether it was system driven or user<br>driven.<br>So you say you use it two to three<br>I think a couple of occasions, only a couple of<br>occasions where there was really quite difficult<br>protracted enquiries and investigations. I'm<br>sorry, I can't remember the names of the post<br>offices. I remember one was in Exeter is all   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | Q.<br>A.<br>Q.<br>A.       | held in branch?<br>Yes, that was my understanding yes.<br>How often did you request such data or see such<br>data?<br>Possibly once or twice with post offices that<br>were in this kind of scenario. I'm not saying<br>the same particular trigger that were disputing<br>discrepancies. I do remember it was actually<br>through the BIM process, through Nick Crow, that<br>it had been requested to try to prove or<br>disprove a sequence of events that might have<br>explained whether it was system driven or user<br>driven.<br>So you say you use it two to three<br>I think a couple of occasions, only a couple of<br>occasions where there was really quite difficult<br>protracted enquiries and investigations. I'm<br>sorry, I can't remember the names of the post<br>offices. I remember one was in Exeter is all<br>can say.   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | Q.<br>A.<br>Q.<br>A.       | held in branch?<br>Yes, that was my understanding yes.<br>How often did you request such data or see such<br>data?<br>Possibly once or twice with post offices that<br>were in this kind of scenario. I'm not saying<br>the same particular trigger that were disputing<br>discrepancies. I do remember it was actually<br>through the BIM process, through Nick Crow, that<br>it had been requested to try to prove or<br>disprove a sequence of events that might have<br>explained whether it was system driven or user<br>driven.<br>So you say you use it two to three<br>I think a couple of occasions, only a couple of<br>occasions where there was really quite difficult<br>protracted enquiries and investigations. I'm<br>sorry, I can't remember the names of the post<br>offices. I remember one was in Exeter is all<br>can say.<br>Was it difficult to obtain that information?                 |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q.<br>A.<br>Q.<br>A.       | held in branch?<br>Yes, that was my understanding yes.<br>How often did you request such data or see such<br>data?<br>Possibly once or twice with post offices that<br>were in this kind of scenario. I'm not saying<br>the same particular trigger that were disputing<br>discrepancies. I do remember it was actually<br>through the BIM process, through Nick Crow, that<br>it had been requested to try to prove or<br>disprove a sequence of events that might have<br>explained whether it was system driven or user<br>driven.<br>So you say you use it two to three<br>I think a couple of occasions, only a couple of<br>occasions where there was really quite difficult<br>protracted enquiries and investigations. I'm<br>sorry, I can't remember the names of the post<br>offices. I remember one was in Exeter is all<br>can say.<br>Was it difficult to obtain that information?<br>Yes.         |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q.<br>A.<br>Q.<br>A.       | held in branch?<br>Yes, that was my understanding yes.<br>How often did you request such data or see such<br>data?<br>Possibly once or twice with post offices that<br>were in this kind of scenario. I'm not saying<br>the same particular trigger that were disputing<br>discrepancies. I do remember it was actually<br>through the BIM process, through Nick Crow, that<br>it had been requested to try to prove or<br>disprove a sequence of events that might have<br>explained whether it was system driven or user<br>driven.<br>So you say you use it two to three<br>I think a couple of occasions, only a couple of<br>occasions where there was really quite difficult<br>protracted enquiries and investigations. I'm<br>sorry, I can't remember the names of the post<br>offices. I remember one was in Exeter is all<br>can say.<br>Was it difficult to obtain that information?<br>Yes.         |

| 1  |    | know, you'd have to ask for, and it may have     |
|----|----|--|
| 2  |    | been on occasions that, you know, it wasn't      |
| 3  |    | available for whatever reason, it's a question   |
| 4  |    | for Fujitsu to understand how they audited and   |
| 5  |    | retained and held that information. But, no, it  |
| 6  |    | wasn't something that I could just freely        |
| 7  |    | obtain.  |
| 8  | Q. | Did you have to get internal approval to seek    |
| 9  |    | such information?                                |
| 10 | Α. | I don't remember doing so, I remember it just    |
| 11 |    | feeling that if it was the right one one of      |
| 12 |    | the right questions to ask in a circumstance     |
| 13 |    | that we would ask.                               |
| 14 | Q. | Were you aware of any costs implications of      |
| 15 |    | obtaining such data?                             |
| 16 | Α. | l wasn't no.                                     |
| 17 | Q. | Are you aware of any whistleblowing policies in  |
| 18 |    | Post Office at the time, relating to issues such |
| 19 |    | as remote access or bugs, errors and defects?    |
| 20 | Α. | No, I'm sorry.                                   |
| 21 | MR | STEVENS: Sir, I'm just looking at the time.      |
| 22 |    | I've still got a few topics to cover and there   |
| 23 |    | are questions from Core Participants as well.    |
| 24 |    | I understand Mr Blackburn is available tomorrow  |
| 25 |    | to give evidence.                                |
|    |    | 213  |

| 1  | MR   | STEVENS: Thank you, sir.                           |
|----|------|--|
| 2  | (4.1 | 1 pm)  |
| 3  |      | (A short break)                                    |
| 4  | (4.1 | 5 pm)  |
| 5  | MR   | STEVENS: Sir, can you see and hear me?             |
| 6  | SIR  | WYN WILLIAMS: I can.                               |
| 7  | MR   | STEVENS: Good thank you. I'll carry on.            |
| 8  |      | Mr Blackburn, before moving on to the next         |
| 9  |      | topical I failed to put something to you           |
| 10 |      | earlier, which I should do now, so apologies for   |
| 11 |      | treading over ground we've covered. Can we go      |
| 12 |      | back to FUJ00121071. This was about the remming    |
| 13 |      | out bug we discussed earlier. At page 3, we        |
| 14 |      | discussed about the ruling out of proactive        |
| 15 |      | recovery plan and also a so relying on             |
| 16 |      | a reactive one. I feel I should put it to you      |
| 17 |      | squarely, from this, is it fair to say that        |
| 18 |      | a reactive recovery plan was, in fact, followed    |
| 19 |      | in this case?                                      |
| 20 | Α.   | Yes.   |
| 21 | Q.   | Thank you. If we could move, then, to cover        |
| 22 |      | a dispute arising from the Hogsthorpe Post         |
| 23 |      | Office, and that is, if we could turn to           |
| 24 |      | POL00021163, please, and page 4. Thank you. So     |
| 25 |      | at the bottom, please, we see that this refers 215 |

| 1  | Α.  | I have come prepared, yes.                       |
|----|-----|--|
| 2  | MR  | STEVENS: I'm happy to carry on but               |
| 3  | SIR | WYN WILLIAMS: Are you saying collectively that   |
| 4  |     | we would go substantially beyond 4.30 if we      |
| 5  |     | tried to finish him today?                       |
| 6  | MR  | STEVENS: I'll just check. How long do people     |
| 7  |     | think they'll be with questions?                 |
| 8  | MR  | JACOBS: Sir, as matters stand, I don't have      |
| 9  |     | anything at the moment.                          |
| 10 | MS  | PAGE: I've only got short questions.             |
| 11 | MR  | STEVENS: In which case, I'd understood there     |
| 12 |     | would be many more questions and so I think      |
| 13 |     | I can fit it in, in that time.                   |
| 14 | SIR | WYN WILLIAMS: Yes, I am reasonably happy to go   |
| 15 |     | until about 4.45. Thereafter, I have to say my   |
| 16 |     | concentration levels will start to waiver but    |
| 17 |     | I'm sure that Mr Blackburn would prefer to       |
| 18 |     | finish if he could tonight.                      |
| 19 | Α.  | l would. Thank you.                              |
| 20 | MR  | STEVENS: I have been asked if we can take        |
| 21 |     | a five-minute break for the purposes of the      |
| 22 |     | transcriber.                                     |
| 23 | SIR | WYN WILLIAMS: I tell you what, let's take five   |
| 24 |     | minutes and then everybody can sharpen           |
| 25 |     | themselves to try to finish by 4.45.             |
|    |     | 214  |
|    |     |  |
| 1  |     | to the Hogsthorpe Post Office, who at the time   |
| 2  |     | was operated by David Hedges who liked to be     |
| 3  |     | known as Tom Hedges. Mr Hedges is a Core         |
| 4  |     | Participant in this Inquiry who has provided     |
| 5  |     | a witness statement, and this is an email from   |
| 6  |     | Karen Arnold; do you recall who she was?         |
| 7  | Α.  | I'm going to say that generic term again, Retail |
| 8  |     | Network Management arena. Yeah.                  |
| 9  | Q.  | It says:   |
| 10 |     | "Further to our conversation last week           |
| 11 |     | regarding the losses at Hogsthorpe, the SPMR     |
| 12 |     | David Hedges (who liked to be known as Tom) has  |
| 13 |     | contacted the NBSC to establish what the         |
| 14 |     | BAU"   |
| 15 |     | Is that business as usual?                       |
| 16 | A.  | Yes.   |
| 17 | Q.  | " BAU/correct process is for suspending          |
| 18 |     | a session of Smartpost."                         |
| 19 |     | Can you assist us with what Smartpost is?        |
| 20 | ٨   | Only it was a transaction at the time. I can't   |

- 20 A. Only it was a transaction at the time. I can't
- 21 remember what, specifically, but it was
- 22 a posting transaction.
- 23 Q. It says:
- "Tom tells me that the NBSC said it was okay 24
- to use either of the methods he describes. As 25 216

| 1        |    | a reminder, I have copied information below in     | 1        |          | even belief, that the Horizon application could  |
|----------|----|--|----------|----------|--|
| 2        |    | respect of what described to me last week."        | 2        |          | or did generate erroneous discrepancies linked   |
| 3        |    | That is over the page. We don't need to            | 3        |          | to this transaction type."                       |
| 4        |    | look at that in any detail.                        | 4        |          | Now when you say that, are you saying            |
| 5        |    | If we could have on the screen at the same         | 5        |          | transaction type is Smartpost?                   |
| 6        |    | time, please, paragraph 21 of your witness         | 6        | Α.       | Yes.   |
| 7        |    | statement on page 11, and on the actual            | 7        | Q.       | So you were aware of the ability of Horizon to   |
| 8        |    | document, POL00021163. If we could go to           | 8        |          | create discrepancies                             |
| 9        |    | page 5, please. If you go below that for the       | 9        | Α.       | The general was, we've discussed, yes. I was     |
| 10       |    | time being. Thank you.                             | 10       |          | particularly hence I chose my words quite        |
| 11       |    | Your response on 7 July was to say that:           | 11       |          | carefully there. It was Smartpost,               |
| 12       |    | "Fujitsu would not check a replace processor       | 12       |          | specifically.                                    |
| 13       |    | automatically, but I don't believe that would      | 13       | Q.       | Thank you. We can take down the witness          |
| 14       |    | add any value in this instance. As we discussed    | 14       |          | statements, then, for the time being. Why did    |
| 15       |    | last week the most likely explanation was/is       | 15       |          | you think user error was the most likely         |
| 16       |    | user error, but given the always into NBSC and     | 16       |          | explanation, even though you had seen evidence   |
| 17       |    | HSD, we should assume that this is not the root    | 17       |          | of bugs, errors and defects in Horizon in other  |
| 18       |    | cause at this time."                               | 18       |          | areas?   |
| 19       |    | In your witness statement at paragraph 21,         | 19       | Α.       | It's I think an example, looking back, of just   |
| 20       |    | you say:   | 20       |          | how we all thought, behaved, believed, worked    |
| 21       |    | "When Karen Arnold first contacted me, my          | 21       |          | within the processes. And that's despite and     |
| 22       |    | initial response comes from my preempting the      | 22       |          | I know that sounds incredibly silly to say that  |
| 23       |    | most likely root cause of the problem being        | 23       |          | at the end of this review, but that is how we    |
| 24       |    | within branch, which was purely based upon the     | 24       |          | believed, if there had to be evidence to support |
| 25       |    | fact that at the time I had no understanding, or   | 25       |          | Horizon creating discrepancies. So in the        |
|          |    | 217  |          |          | 218  |
|          |    |  |          |          |  |
| 1        |    | absence of the general stance, rightly or          | 1        | •        | you know, it wasn't automatically taken forward. |
| 2        |    | wrongly, was that it was more likely to be user    | 2        | Q.       | Please could we look at page 3 now. So Karen     |
| 3        |    | error interacting with the service in completing   | 3        |          | Arnold replies, saying:                          |
| 4        | ~  | the transaction incorrectly.                       | 4        |          | "I'm not sure why Fujitsu would be changing      |
| 5        | Q. | Please can we bring that document back up. So      | 5        |          | the processor if they didn't think there was     |
| 6        |    | it's POL00021163, and I think it was page 4.       | 6        |          | a problem.                                       |
| /        |    | Yes. The bottom paragraph of your email. You       | /        |          | "Having spoken to Tom today, once the new        |
| 8        |    | say:   | 8        |          | processor is install he is going to do a BP      |
| 9        |    | "If Tom has specific information such as           | 9        |          | rollover and then keep a tally manually of every |
| 10       |    | transaction time and values, please send this      | 10       |          | Smartpost item to check against Horizon. This    |
| 11       |    | across and I will get Fujitsu to investigate       | 11       |          | however won't help anything that has gone [on]   |
| 12       |    | immediately. If has no evidence then I'm afraid    | 12       |          | previously."                                     |
| 13       |    | there is nothing for Fujitsu to investigate."      | 13       |          | Pausing there, if Mr Hedges receives a new       |
| 14       |    | What evidence could Mr Hedges have provided        | 14       |          | processor unit, approaches his transactions in   |
| 15       |    | which Fujitsu or the Post Office didn't have       | 15       |          | the same way, and he stops getting the           |
| 16<br>17 |    | access to?   | 16       |          | discrepancies, that suggests that the processor  |
| 17       | Α. |  | 17       |          | is at fault.                                     |
| 18<br>10 |    | accounting, the transaction logs, the trial        | 18       | Α.       | <b>,</b>   |
| 19<br>20 |    | and/or final balances. But it's right that that    | 19       | ~        | yes.   |
| 20       |    | would have all been available to Fujitsu,          | 20       | Q.       | If he still had discrepancies, that would        |
| 21<br>22 | 0  | correct.   | 21<br>22 |          | suggest that the processor itself wasn't at      |
| 22       | Q. | What was the reason for asking Mr Hedges for this? | 22       | ٨        | fault, it may have been something else<br>Yes.   |
| 23<br>24 | Α. | I can't recollect, but I think it comes from my    | 23<br>24 | A.<br>Q. |  |
| 24<br>25 | д. | previous statement about in the absence of         | 24<br>25 | પ.       | the processor.                                   |
| 20       |    | 219  | 20       |          | 220  |
|          |    |  |          |          |  |

| 1  |          | So changing the processor would give you   |  |
|--|----------|--|--|
| 2  |          | some evidence relevant to determining the cause  |  |
| 3  | _        | of the problem; do you accept that?  |  |
| 4  |          | Yes, it could have done, yes.  |  |
| 5  | Q.       |  |  |
| 6  |          | 2 July. You say:   |  |
| 7  |          | "Karen,  |  |
| 8  |          | "Fujitsu have always had a preventative  |  |
| 9  |          | maintenance policy and therefore sometimes will  |  |
| 10   |          | swap out kit without actually finding a fault.   |  |
| 11   |          | Also it generally helps with customer perception   |  |
| 12   |          | of the service they have received. I accept in   |  |
| 13   |          | this instance that this policy could work  |  |
| 14   |          | against us, but are you suggesting that if after   |  |
| 15   |          | swapping the processor and all discrepancies   |  |
| 16   |          | cease, that Tom will claim this is clear proof   |  |
| 17   |          | of Horizon creating discrepancies? I strongly  |  |
| 18   |          | suggest that Tom obtains the necessary evidence  |  |
| 19   |          | now, if it is available."  |  |
| 20   |          | Pausing there, can we at the same time,  |  |
| 21   |          | please, show your witness statement page 11,   |  |
| 22   |          | paragraph 21. At the bottom, it's three  |  |
| 23   |          | quarters of the way down, you say:   |  |
| 24   |          | "I went on to offer advice which was to  |  |
| 25   |          | obtain evidence prior to requesting that Fujitsu<br>221  |  |
|  |          |  |  |
|  |          |  |  |
| 1  | 0        | But the processor could have been replaced   |  |
| 1  | Q.       |  |  |
| 2  | Q.       | without losing the information and continued the   |  |
| 2<br>3   |          | without losing the information and continued the investigation?  |  |
| 2<br>3<br>4  | Α.       | without losing the information and continued the investigation?<br>It could have been, I believe, yes.   |  |
| 2<br>3<br>4<br>5   |          | without losing the information and continued the<br>investigation?<br>It could have been, I believe, yes.<br>When you're saying "this policy could work  |  |
| 2<br>3<br>4<br>5<br>6  | Α.       | without losing the information and continued the<br>investigation?<br>It could have been, I believe, yes.<br>When you're saying "this policy could work<br>against us" here, are you referring to the loss   |  |
| 2<br>3<br>4<br>5<br>6<br>7   | Α.       | without losing the information and continued the<br>investigation?<br>It could have been, I believe, yes.<br>When you're saying "this policy could work<br>against us" here, are you referring to the loss<br>of investigative options or are you referring to   |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | Α.       | without losing the information and continued the<br>investigation?<br>It could have been, I believe, yes.<br>When you're saying "this policy could work<br>against us" here, are you referring to the loss<br>of investigative options or are you referring to<br>the fact that it may have shown a problem with   |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9   | A.<br>Q. | without losing the information and continued the<br>investigation?<br>It could have been, I believe, yes.<br>When you're saying "this policy could work<br>against us" here, are you referring to the loss<br>of investigative options or are you referring to<br>the fact that it may have shown a problem with<br>the Horizon System?  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8  | Α.       | without losing the information and continued the<br>investigation?<br>It could have been, I believe, yes.<br>When you're saying "this policy could work<br>against us" here, are you referring to the loss<br>of investigative options or are you referring to<br>the fact that it may have shown a problem with<br>the Horizon System?<br>No, it's the first thing. I was again,  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10   | A.<br>Q. | without losing the information and continued the<br>investigation?<br>It could have been, I believe, yes.<br>When you're saying "this policy could work<br>against us" here, are you referring to the loss<br>of investigative options or are you referring to<br>the fact that it may have shown a problem with<br>the Horizon System?  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11   | A.<br>Q. | without losing the information and continued the<br>investigation?<br>It could have been, I believe, yes.<br>When you're saying "this policy could work<br>against us" here, are you referring to the loss<br>of investigative options or are you referring to<br>the fact that it may have shown a problem with<br>the Horizon System?<br>No, it's the first thing. I was again,<br>rightly or wrongly at the time, I was really  |  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12   | A.<br>Q. | without losing the information and continued the<br>investigation?<br>It could have been, I believe, yes.<br>When you're saying "this policy could work<br>against us" here, are you referring to the loss<br>of investigative options or are you referring to<br>the fact that it may have shown a problem with<br>the Horizon System?<br>No, it's the first thing. I was again,<br>rightly or wrongly at the time, I was really<br>wanting the postmaster to try and gather the  |  |
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| A. | <text><text></text></text>   |
|----|--|
|    | Despite what you just said a few minutes<br>ago, Sam, if we'd have replaced the processor<br>and the new processor didn't display the same |
|    | symptoms and errors, I believe that there's  |
|    | a strong possibility that would equally have led to an end to the investigation and there would  |
|    | have been an assumption made that the  |
|    | discrepancies were created in branch, rather   |
|    | than the technology.   |
| Q. | Was this not a type of case where keystroke data   |
|    | may have been of assistance?   |
| Α. | Yes, I think it probably would have done, on   |
|    | reflection, but I don't remember, and clearly  |
|    | reneeden, but runt runnenbur, and oldany   |

- reflection, but I don't remember, and clearly haven't mentioned it at this point in time, and I don't remember it being raising subsequently either. Q. Thank you. If we could take down the witness
- statement, please, but keep up the document. If we go up to the next page where it's John Breeden's email. If we could go to the next
- page up, please. Thank you.
  - This is an email from John Breeden on
- 3 July. Do you recall who John Breeden was?
- A. Again, Retail Network. Possibly Karen Arnold's
- line management chain. More senior.

| 1  | •  | It cover   |
|--|----|--|
| 1<br>2   | Q. | It says:<br>"I have read the recent emails on the above  |
| 2  |    | and considered the information. I am concerned   |
| 4  |    | if we swap the processor now and the errors stop   |
| 4<br>5   |    |  |
| 6  |    | this could lead to (i) a claim that Horizon has  |
| 7  |    | problems in its accuracy and fuel some of the  |
|  |    | recent press articles and (ii) the SPMR will   |
| 8  |    | claim that all previous errors are down to   |
| 9  |    | Horizon and we have no way to disprove this if   |
| 10<br>11   |    | everything is resolved when the new processor is<br>installed."  |
| 12   |    |  |
| 12   |    | Over the page, it goes on to say:<br>"I think we need to think this one through  |
|  |    | C C  |
| 14<br>15   |    | carefully and the SPMR should be providing   |
| 15   |    | evidence to support his claims which can be  |
| 16<br>17   |    | investigated before we change pieces of  |
| 17   |    | equipment."  |
| 18   |    | So at this stage, was there a general  |
| 19   |    | concern in Post Office affecting investigations  |
| 20   |    | about the risk of litigation relating to   |
| 21   |    | Horizon?   |
| 22   | Α. | Well, the retail network managers would be   |
| 23   |    | better placed to answer that, but as maybe   |
| 24<br>25   |    | I mentioned earlier, I believe, you know, there  |
| 25   |    | was an upward trend in the volume of this type 225   |
|  |    |  |
| 1  |    | high on hut the IT directorete and function  |
| 2  |    | higher, but the IT directorate and function  |
|  |    | would have been the ones communicating to the  |
| 3  | ~  | likes of myself.   |
| 4<br>5   | Q. | Do you think the points mentioned by Mr Breeden  |
| 6  |    | in points (i) and (ii) here are in any way<br>appropriate considerations to take into account  |
| 7  |    | when deciding how to investigate potential   |
| 8  |    | discrepancies?   |
| 9  | Α. | Well, you know, again, it's passage of time.   |
| 9<br>10  | А. | isn't it? But it's interesting that John seems   |
| 11   |    | to be coming to the same conclusion as me in   |
| 12   |    | terms of the process we're following, but for  |
| 13   |    | a slightly different reason. My entire job was   |
| 14   |    |  |
| 15   |    |  |
|  |    | about trying to resolve issues and fix issues on   |
|  |    | behalf of the Post Office and the postmasters,   |
| 16   |    | behalf of the Post Office and the postmasters,<br>not to be covering up anything or being  |
| 16<br>17   |    | behalf of the Post Office and the postmasters,<br>not to be covering up anything or being<br>negative. So for me personally, no, it was not  |
| 16<br>17<br>18                                     |    | behalf of the Post Office and the postmasters,<br>not to be covering up anything or being<br>negative. So for me personally, no, it was not<br>a criteria that was necessary in determining  |
| 16<br>17<br>18<br>19                               | 0  | behalf of the Post Office and the postmasters,<br>not to be covering up anything or being<br>negative. So for me personally, no, it was not<br>a criteria that was necessary in determining<br>what actions we were going to take.   |
| 16<br>17<br>18<br>19<br>20                         | Q. | behalf of the Post Office and the postmasters,<br>not to be covering up anything or being<br>negative. So for me personally, no, it was not<br>a criteria that was necessary in determining<br>what actions we were going to take.<br>Can we quickly bring up, please, POL00012547 at  |
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| 16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q. | behalf of the Post Office and the postmasters,<br>not to be covering up anything or being<br>negative. So for me personally, no, it was not<br>a criteria that was necessary in determining<br>what actions we were going to take.<br>Can we quickly bring up, please, POL00012547 at<br>page 3. Under the Wednesday entry sorry,<br>this is a note from Karen Arnold. It's on this<br>issue. On the Wednesday entry, it says:   |

| 1  |          | of enquiry. So that would make perfect sense if   |
|--|----------|---|
| 2  |          | there was.  |
| 3  | Q.       | If we look at that email, I think if we go up,  |
| 4  |          | in August 2009 sorry, July 2009. Were you   |
| 5  |          | aware of a Computer Weekly article in May 2009  |
| 6  |          | regarding the robustness of Horizon?  |
| 7  | Α.       | Actually, now you mention it, I think that was  |
| 8  |          | one of the things that we were all informed   |
| 9  |          | about, yes. So I think it was brought to our  |
| 10   |          | attention as staff members.   |
| 11   | Q.       | What was said to you, in respect of that  |
| 12   |          | article?  |
| 13   | Α.       | I think it was and again, I'm sorry, because  |
| 14   |          | this is just, as you can tell, how I believed it  |
| 15   |          | was at the time and how we were, and how we   |
| 16   |          | operated, but I believed, again, we were  |
| 17   |          | reassured that Horizon was fit for purpose.   |
| 18   | Q.       | Shaun Turner today gave evidence that   |
| 19   |          | communications on that issue came down from what  |
| 20   |          | he thought were board level, regarding the  |
| 21   |          | robustness of Horizon in response. Would you  |
| 22   |          | agree with that?  |
| 23   | Α.       | Yes. I mean, the part of the business I worked  |
| 24   |          | in is where the message would have come from,   |
| 25   |          | ultimately, I would assume. It's come from  |
|  |          | 226   |
|  |          |   |
|  |          |   |
| 1  |          | who confirmed he had been short by approximately  |
| 1  |          | who confirmed he had been short by approximately  |
| 2  |          | £40 on his last BTS, and had made this good.  |
| 2<br>3   |          | £40 on his last BTS, and had made this good.<br>Advised that Fujitsu confirmed that they have   |
| 2<br>3<br>4  |          | £40 on his last BTS, and had made this good.<br>Advised that Fujitsu confirmed that they have<br>not found any system errors which would have   |
| 2<br>3<br>4<br>5   |          | £40 on his last BTS, and had made this good.<br>Advised that Fujitsu confirmed that they have<br>not found any system errors which would have<br>caused the discrepancies and concluded that  |
| 2<br>3<br>4<br>5<br>6  |          | £40 on his last BTS, and had made this good.<br>Advised that Fujitsu confirmed that they have<br>not found any system errors which would have<br>caused the discrepancies and concluded that<br>there was nothing wrong with the processor.   |
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| 1  | Α. | That's news to me. I didn't know that.  |
|--|----|---|
| 2  | Q. | In this case, the fact that Fujitsu said they'd   |
| 3  |    | found no problems with the system, we discussed   |
| 4  |    | in your evidence earlier that there was no or   |
| 5  |    | you didn't have sufficient support internally   |
| 6  |    | with IT to check what they were saying, and you   |
| 7  |    | relied on their expertise?  |
| 8  | Α. | (The witness nodded)  |
| 9  | Q. | Was this a case where you would have gone to  |
| 10   |    | someone within IT to check on it?   |
| 11   | Α. | I would have liked to have had the opportunity.   |
| 12   |    | I really think that that wasn't the case.   |
| 13   |    | I don't think that this investigation went  |
| 14   |    | I mean, naturally emails don't record   |
| 15   |    | everything, there were lots of conversation, but  |
| 16   |    | I think that this pretty much summarises the  |
| 17   |    | investigation.  |
| 18   | Q. | I'm going to simply ask you now to turn to  |
| 19   |    | page 15 of your statement, please. In it, you   |
| 20   |    | say that:   |
| 21   |    | "[You] have chosen to remain with the IT  |
| 22   |    | service industry, and if I've learnt one thing  |
| 23   |    | during that time, it is that IT can and does  |
| 24   |    | fail and that people are fallible and make  |
| 25   |    | mistakes. It is how you respond to those  |
|  |    | 229   |
|  |    |   |
|  |    |   |
| 1  | Α. | It's hard for me to reconcile, years down the   |
| 1<br>2   | Α. | It's hard for me to reconcile, years down the<br>line, in my mind, given all the evidence that  |
|  | Α. | -   |
| 2  | A. | line, in my mind, given all the evidence that   |
| 2<br>3   | Α. | line, in my mind, given all the evidence that<br>we've gone through today with me, let alone what   |
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| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Α. | line, in my mind, given all the evidence that<br>we've gone through today with me, let alone what<br>I'm sure you've gone through throughout the<br>Inquiry, how the HR and the human element was so<br>misaligned. It almost feels to me that there<br>was some disconnect between the reality of what<br>we were all trying to manage in the right way,<br>for the right reasons, and the impact and the<br>outcome.<br>I just cannot understand, probably because<br>I wasn't part of that part of the business,<br>I didn't see what retail network managers had to<br>go through, the policies that they had. I'm not<br>even familiar with a subpostmaster's contract,<br>for example. But still find it very hard for<br>you to tell me that the gentleman at Hogsworth<br>( <i>sic</i> ), you know, suffered in that way, off the<br>back of something where there was clearly<br>an element of doubt.<br>And I think that's the thing for me. There<br>was doubt. Despite the messages, despite  |

| on II | Inq | ury 28 Februar                                   |
|-------|-----|--|
| 1     |     | circumstances that matter. Openness and honesty  |
| 2     |     | is, and always will be, the best policy.         |
| 3     |     | Clearly there were occasions when the benefit of |
| 4     |     | doubt could and should have been given. I'm      |
| 5     |     | sickened by what I've read post-my time at Post  |
| 6     |     | Office and have experienced a wave of emotions   |
| 7     |     | from sadness, shame and anger."                  |
| 8     |     | Do you think the Post Office should have         |
| 9     |     | been more open and honest?                       |
| 10    | Α.  | With the benefit of hindsight, in some respects, |
| 11    |     | but yes, clearly.                                |
| 12    | Q.  | If so, how? In what ways?                        |
| 13    | Α.  | I think I can only try and convey what I thought |
| 14    |     | my role was, and it wasn't to cover up any       |
| 15    |     | issues with technology. It was to ensure that    |
| 16    |     | we were providing a quality service to the       |
| 17    |     | British public through the branch network and    |
| 18    |     | that includes the independent network.           |
| 19    |     | Everything I ever tried to do, and my team tried |
| 20    |     | to do, was for that end and that benefit.        |
| 21    |     | To watch the programme, as I did two years       |
| 22    |     | ago on TV, and see people rather than FAD codes  |
| 23    |     | was was difficult. Apologies.                    |
| 24    | Q.  | There is no need to apologise. If you wish to    |
| 25    |     | take a moment, please do so.                     |
|       |     | 230  |
| 1     |     | that there were risks involved. And they may     |
| 2     |     | have been small in the greater context, as in    |
| 2     |     | the volume of I appreciate the impact has        |
| 4     |     | been huge on individuals, but I find that        |
| 5     |     | I simply can't reconcile it, in my own mind now, |
| 6     |     | today, I'm afraid. Hence the emotional words     |
| 7     |     | l've used there, and that's where the anger      |
| 8     |     | comes from as well. I worked very hard.          |
| 0     |     | somes nom as well. I worked very hard.           |

- 9 MR STEVENS: Mr Blackburn, I don't have any further
- 10 questions but is there anything further you
- 11 would like to say before I ask if the Core
- 12 Participants ...
- 13 A. No, I just hope that it's of use.

14 SIR WYN WILLIAMS: Are there any other questions?

- 15 MS PAGE: Sir, I just would like to follow on with
- 16 the rest of what is actually in the same
- 17 paragraph that Mr Stevens has just referred to,
- 18 if I may.

22

- 19 SIR WYN WILLIAMS: All right.
- 20 **MS PAGE:** It's very brief.
- 21 SIR WYN WILLIAMS: Yes.

#### Questioned by MS PAGE

- 23 MS PAGE: At the end of that same paragraph, you
- 24 said that:
- 25 "If [you'd] had more visibility of the

| 1  |     | action that was taken against subpostmasters,           |
|----|-----|---|
| 2  |     | you hope that you would have found the courage          |
| 3  |     | to challenge, sound a note of caution, and              |
| 4  |     | promote the communication of outcomes more              |
| 5  |     | vigorously and robustly than I perhaps did."            |
| 6  | Α.  | Yes.  |
| 7  | Q.  | My question is simply: what do you think the            |
| 8  |     | reaction of those above you would have been if          |
| 9  |     | you had?  |
| 10 | Α.  | Well, I think the fact that I didn't probably           |
| 11 |     | gives you your answer. I don't think                    |
| 12 |     | a highly politicised organisation, very                 |
| 13 |     | hierarchical, I'd have been seen as stepping out        |
| 14 |     | of line with the message. I can't imagine that          |
| 15 |     | that would have been good for my career, so I'm         |
| 16 |     | sure at that point in time and this is                  |
| 17 |     | obviously a hindsight reflection I obviously,           |
| 18 |     | on occasions, chose to unconsciously protect            |
| 19 |     | myself.   |
| 20 | MS  | PAGE: Thank you. That's all I wanted to ask.            |
| 21 | SIR | WYN WILLIAMS: Thank you, Ms Page.                       |
| 22 |     | Thank you, Mr Blackburn, for firstly giving             |
| 23 |     | a witness statement and, secondly, answering            |
| 24 |     | a good deal of questions this afternoon and I'm         |
| 25 |     | grateful to you for the frankness with which you<br>233 |
|    |     |   |

| 1  | have expressed some of your emotions.              |
|----|--|
| 2  | So I'm glad we were able to complete today.        |
| 3  | I'm sure that's of great relief to you. I'll       |
| 4  | see everybody else at 10.00 tomorrow morning.      |
| 5  | MR STEVENS: Thank you, sir, and we're hearing from |
| 6  | Anne Allaker and Gayle Peacock.                    |
| 7  | SIR WYN WILLIAMS: Yes, thank you.                  |
| 8  | MR STEVENS: Thank you, sir.                        |
| 9  | (4.45 pm)  |
| 10 | (The hearing adjourned until 10.00 am              |
| 11 | the following day)                                 |
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| 235/10                     | 75/24 76/2 76/10                           | 89/3 89/9 89/20 89/21                       | 51/19 59/17 64/16                         | 10/12 11/9 11/12                      |
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| Blake [9] 2/10 2/25        | 83/13 84/18 85/16                          | 95/21 98/18 100/5                           | 79/16 79/24 83/6                          | 63/22 69/19 81/19                     |
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| 113/17 119/6 119/24        | 93/14 95/15 95/16                          | 124/2 124/4 124/17                          | 86/6 87/7 95/24 96/17                     | 109/25 115/4 120/7                    |
| 235/4                      | 95/18 101/7 101/22                         | 126/22 126/24 145/2                         | 116/14 117/13 118/10                      |                                       |
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|                            |  |   |   |                                       |
|                            |  |   |   | (64) below - call                     |

| Call [5]         171/5         29/24 30/2 32/11         capability [2]         12/8         19/8/2 217/18 217/32         20/22 207/25 210/6           178/22 195/8 20/2/3         37/14 37/24 40/2         14/14 31/24 40/2         capacity [6]         10/15         51/4 57/22 80/17         chambers [3]         48/11           24/8 28/10 309 35/25         40/21 40/22 42/14         169/15 166/18         55/15 59/3         23/31/13 33/3 94/13         37/33 94/13         37/33 94/13         37/33 94/13         37/17 182/25 186/5         94/14 127/12 143/12         19/8/1 197/11 197/11         20/8/2 20/17         23/31/13 33/3 94/13         37/17 182/25 186/16         56/25 69/21 109/12         19/8/1 20/21 156/18         228/5         20/14 20/21 42/21 20/8/2         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/8/10 22/15 22/16         20/11 22/12 20/17         20/8/10 20/21 17/9/21         20/21 20/17 20/9/22/17 20/9/17 20/9/17 20/9/17 20/9/17 20/9/17 20/9/17 20/9/17 20/9/17  | С                     | 27/24 28/17 29/5     | 208/15 231/11        | 160/15 162/8 169/13 | 48/1 74/6 180/13      |
|---|-----------------------|----------------------|----------------------|---------------------|-----------------------|
| 178/22         196/8         202/23         196/12         196/24         22/12/22/014         Chamber [1]         197/14           120/21         203/21         21/14         23/14         23/14         23/14         197/14           120/22         21/14         21/14         21/14         22/12         22/14         15/12         53/17           24/14         20/14         21/14         21/14         21/14         15/14         11/14         15/14         11/14         15/14         11/14         15/14         11/14         15/14         11/14         15/14         11/14         11/14         11/14         11/14         11/14         11/14         11/14         11/14         11/14         11/14         11/14   |                       | 29/24 30/2 32/11     |                      |                     |                       |
| 203/21         34/16 36/11 36/17         Capacity [b] 10/15         Caused [17] 48/3         Sold 28/17         Change [14] 17/19           24/8 28/10 30/9 35/25 40/21 40/22 42/14         11/3 11/8 61/10         51/4 75/22 80/17         Sold 28/17         23/3 31/13 33/3 84/15           37/26 36/21 01/8         40/21 40/22 42/14         Capture [1] 17/18         13/17/18 71/18/25 16/35/5         Sold 29/17         20/8 20/92 20/82           110/18 122/21 127/7         45/11 46/16         Career [1] 17/18 1/2 18/12 20/92 20/99 20/92         Cold 20/92  |                       |                      |                      |                     |                       |
| called [20]         5/17 5/22         3/14 3/24 4/02         113 118 61/10         5/14 7/322 80/17         change [14]         17/19           24/8 28/10 300 35/26         43/19 43/22 4/15         carp [11] 17/18         137/17 182/25 186/25         9/14 27/12 12/12 12/12         23/3 31/3 33/3 34/13           37/23 62/19 1108         43/19 43/22 4/15         care [11] 47/18         137/17 182/25 186/25         9/14 27/12 12/12 12/12         12/14 12/14         19/14 17/17         20/18 20/19 20/19         20/17 13 20/18 20/12 20/13         20/16 20/17 3 20/18 20/12 20/13         20/16 20/17 3 20/18 20/12 20/13         20/16 20/17 3 20/18 20/12 20/13         20/16 20/17 3 20/18 20/12 20/13         20/16 20/17 3 20/18 20/17 20/17 10/17 110/11 10/11 10/11 10/11         10/16 20/17 110/11 10/11 10/11 10/11         10/16 20/17 110/11    |                       |                      |                      |                     |                       |
| 24/8 28/n 3 309 35/25         40/21 40/22 42/14         109/15 109/16         50/13 62/15 90/35         23/3 37/13 20/25           7/23 62/91 108/6         45/11 45/14 46/16         carter [1] 17/18         13/17 18/2/5 18/05 9         29/31 41/27/12 14/3/2           110/18 122/21 127/7         45/11 45/14 46/16         career [8] 17/12 18/12 19/02 20/99 20/99 20/99         20/81 02/22 20/83         career [8] 17/12 18/12 19/02 20/99 20/99 20/99         charge [2] 33/22 11/99/12           139/19 139/14         62/15 64/66 64 67/17 11/12/24 14/21         career [6] 17/12 18/12 18/25 19/64/18         charge [2] 33/22 11/99/12         11/9/24           Callender [62] 36/22 10/71 34/17 34/17 36/4         63/16 64/77 10/9/7 10/9/7 10/71 1   |                       |                      |                      |                     |                       |
| 37/25 02/19 (10/6)         45/1 4.5/14.46/16         career [1] 4/13         196/11 197/11 197/11 197/13         208/0 2227 208/3           10/16 1222 11277         7/4 7423 443 647         career [1] 172 187/1         1899 209/8 20/8         208/0 227/5 226/6           13/16 16/11 197/11 197/11 1907         208/0 227/5         228/5         208/0 227/5 122/5         228/5           13/16 16/21 197/1         76/1 86/14         56/7 59/3 59/6 61/6         56/25 66/21 109/12         228/5         179/24           13/16 36/5 37/13 49/18         78/3 87/8 44/16         57/8 57/3 59/7         208/0 227/17         179/24           70/10 52/17 53/6         58/7 59/3 59/9         90/13 90/14 99/15         110/17 10/21 169/6         causing [1] 71/7         131/21 33/33 34/6           58/17 58/23 59/9         90/23 96/14 97/3 97/6         1112/0 130/25 179/16         causing [1] 25/12         catring [1] 41/16         26/11         16/11 30/71         16/11 30/71         16/11 30/71         16/11 30/71         16/11 30/71         16/11 30/71         16/11 30/71         16/11 30/71         16/11 30/71         16/11 30/71         16/11 30/71         16/11 30   |                       |                      |                      |                     |                       |
| 100/10         12221         127/1         147/6         47/6         47/6         47/6         47/6         47/6         47/6         47/6         47/6         47/6         47/6         47/6         47/6         47/6         47/6         47/6         47/6         47/6         37/2  | 37/23 62/19 110/8     |                      |                      |                     |                       |
| 14/12         150/1         56/7         59/3         59/6         6/6/6         66/6/2         228/5         changed [2]         33/22           139/9         193/4         67/9         64/6         66/6         7/7         123/4         128/16         23/31/2         179/24           36/1         36/5         37/13         49/18         21/7         123/2         12/21         22/16         changes [6]         31/17           36/1         36/5         37/13         49/18         21/8         21/8         23/31         13/17         53/23         34/10         53/17         63/16         63/17         13/17         53/17         53/16         53/17 <td></td> <td></td> <td></td> <td></td> <td></td>   |                       |                      |                      |                     |                       |
| 1/3/1       1/3/1       150/14   |                       |                      |                      |                     |                       |
| 19.99         19.94         67/9 69/19 70/8 71/5         carefully [3]         1/7         20/13         causing [3]         7/7  |                       |                      |                      |                     |                       |
| Calinetia (k2)         722 727 72/13 76/18         7212 727 72/13 76/18         7212 727 72/13 76/18         7212 72/13 76/18         7213 76/18   |                       | 67/9 69/19 70/8 71/5 |                      |                     | changeover [1]        |
| 50/10 52/17 53/6         76/3 81/3 81/17 63/4         carred [9] 109/17         44/10 93/13 104/10         31/21 33/23 34/6           54/14 54/16 55/16         65/16         65/16         65/16         65/16         57/12 56/23 68/8         90/13 90/14 90/15         11/20 110/21 169/20         cauton [1] 233/3         34/17 204/16           56/17 57/23 58/9         90/13 90/14 90/15         11/20 130/25 179/16         cauton [1] 233/3         24/17 204/16         changes [6] 31/17         31/21 33/23 34/6           58/17 56/22 68/9         90/21 91/1 93/15 94/4         carrying [3] 43/17         carrying [3] 43/17         carrying [3] 43/17         contrallsed [1] 37/5         change [6] 29/20 33/7           59/15 16/14 116/22         101/6 101/11 102/14         case [24] 33/4 39/10         125/1 128/9 132/12         62/1         change [3] 99/7 39/9           117/13 117/23 118/10         115/1 16/13 120/4         83/5 88/2 142/9         central [19] 52/20 15/1 128/9 132/12         62/1         62/1         62/1         62/1         62/1         62/1 3/3 39/10         13/4/1 33/6 135/18         44/13           119/2 175/2 178/11 17/12         131/12 132/16         case [24] 33/4 39/10         125/1 128/17 91/27         62/1         62/1         62/1 3/3 39/10         12/1 13/10         63/17 63/10 7/1         63/17 63/10 7/1         63/17 63/10 7/1         63/17 63/10 7/1  |                       |                      |                      | causing [5] 7/17    |                       |
| 54/14 54/16 55/16         85/12 88/8 89/12 90/1         109/1 / 110/21 1109/0         199/1 / 112/31         31/21 33/23 3/4/6           57/15 57/23 80/9         90/21 91/1 93/15 94/4 carry (6) 43/19         caution (1) 23/3         carang (1) 23/3         91/21 20/4/16           58/17 58/24 59/8         90/21 91/1 93/15 94/4 carry (6) 43/19         91/24 220/4 221/1         b/1/2 20/4 221/1         carry (6) 43/19         carratised (1) 37/5         st/1 3/21 33/23 3/4/6         91/24 220/4 221/1         b/1/2 20/4 221/1         carratised (1) 37/5         st/1 3/21 33/23 3/4/6         37/4 3/20 3/2         37/4 3/10 3/21         37/4 3/10 3/21         37/4 3/21         37/2 3/21         37/2  |                       | 78/3 81/3 81/17 85/4 | carried [5] 109/15   | 44/10 93/13 104/10  | changes [6] 31/17     |
| 57/15         57/16         57/16         57/17 <th< td=""><td></td><td></td><td></td><td></td><td></td></th<>  |                       |                      |                      |                     |                       |
| 58/17 58/24 59/8         90/21 911 93/15 94/4 (carry [6] 4.3/19         Cease [1] 12/110         changing [4] 76/23           69/17 61/22 64/9         95/23 96/14 97/23         214/2 215/7         central [1] 25/12         channels [2] 83/13           68/25 79/14 79/23         10/16 101/11 10/21         carry [1] 53/19         99/24 220/14 220/14 220/14 220/14 220/14 220/14 220/14 220/13           76/25 89/8         10/16 101/11 10/21         carry [1] 55/3         entrall [1] 25/12         centrall [1] 25/12  |                       |                      |                      |                     |                       |
| 39/17         61/22         61/24         97/24 <td< td=""><td></td><td></td><td></td><td></td><td></td></td<>  |                       |                      |                      |                     |                       |
| 104/19 00/163/1         101/6 101/11 102/14         carrying [3] 43/17         carrying [3] 43/17           80/25 78/14 79/23         104/15 106/13 107/6         82/11 176/15         carrying [3] 43/17           80/20 85/25 96/8         107/22 109/15 114/10         cascaded [4] 55/3         g9/9 227/25         carrying [3] 42/17           117/13 117/23 118/10         115/1 116/13 120/4         83/5 88/2 142/9         carrying [3] 43/17         carrying [3] 43/17           119/2 175/2 175/7         13/16 181/14         13/17 122/12 (22/12 26/12         cascaded [4] 55/3         g9/9 227/25         s7/4 37/10 39/19           118/2 11/12 124/12 124/12 126/12 case [24] 33/13 39/10         125/1 128/9 132/4         chasing [2] 24/18         chasing [2] 24/18           126/12 caller [1] 142/22         137/15 137/19 138/10         71/3 79/2 80/20 95/25         18/16 19/14 192/19         13/4/15 13/6/17           136/12 17/14 17/14 17/14         138/15 193/21         138/15 198/17         13/17 15 13/17         13/17 13/17           15/2 17/14 71/14 21/24         15/2 18/10         13/17 11 73/17         13/17         13/17         13/17           15/2 17/14 71/14 21/24         15/2 18/10         13/17 11 73/17         13/17         13/17         13/17         13/17           15/2 17/14 71/14 21/24         15/2 18/10         13/17 11 73/17         13/17   | 59/17 61/22 64/9      |                      |                      |                     |                       |
| ba/29         ba/29         ba/21         ba/21         ba/21         ba/22         ba/22 <td< td=""><td></td><td></td><td></td><td></td><td></td></td<>  |                       |                      |                      |                     |                       |
| 80/20 80/25 90/2         97/2 2109/15 114/10         cascaded [4] 55/3         99/9 227/25         37/4 37/10 39/19           117/13 117/23 118/10         15/1 116/13 120/4         83/5 88/2 142/9         centre [19] 5/4 89/16         92/2 21/25         37/4 37/10 39/19           119/2 175/2 115/1         15/1 116/13 120/4         83/5 88/2 142/9         centre [19] 5/4 89/16         92/2 21/25         62/1         chase [3] 39/7 39/9           119/2 175/2 131/16 181/14         130/18 131/25 132/6         for 65/25 63/11         13/415 135/6         62/1         chase [3] 39/7 39/9           12/2 12/26         130/18 31/25 132/6         cascading [1] 164/16         92/2 20/31         13/415 135/6         62/1         chase [3] 39/7 39/9           13/15 137/19 39/19         130/14 131/25         130/17 41/14         130/14 13/26         chase [3] 39/7 39/9         chase [3] 39/7 39/9           13/15 130/14         130/15 133/4         130/16 14/17         cascading [1] 164/16         12/51 128/01 14/10         chase [3] 39/7 39/9           15/11 142/22         13/17 13/71         13/17 13/17         13/17 31/13 13/7         13/14         chase [3] 39/7 39/9           15/11 142/12         13/17         13/17 13/17         13/17 13/17         13/17 31/17         13/17         13/17         13/17         13/17         13/17         13/17<  |                       |                      |                      |                     |                       |
| 30/15/16/14/10/24         15/1 116/13 120/4         83/5 88/2 142/9         centre [19] 5/4 80/18         chase [3] 39/7 39/9           117/13 117/23 117/3         12/1/2 124/12 126/1         case [24] 33/4 33/10         case [24] 33/4 33/10         12/5/1 128/9 132/4           12/6         13/14 13/5 132/6         case [24] 33/4 33/10         13/17 64/10 64/1         13/15 135/6 135/6         chase [1] 3/2/2         chase [1] 3/2/2         13/15 135/6 135/6           callers [1] 6/25         case [24] 3/4 23/6         13/17 64/10 64/7         19/17 64/10 64/7         19/45 201/16         chase [1] 3/2/2         13/14 13/2           15/2 17/8 17/11 17/13         152/19 157/10 158/25         22/10 228/21 228/25         89/16 125/7 188/1         62/1         14/10 140/24 152/19           17/14 17/14 42/14         146/7 166/4         cases [1] 66/6 73/3         67/19 70/2 72/22 82/7         certai [9] 13/4         cases [1] 46/1         17/16 22/22 14/7         checkel [3] 46/1         17/8/22 22/1/2         22/10 228/2         22/10 228/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         22/10 22/2         17/2         1  |                       |                      |                      |                     |                       |
| 111/12/3176/7         121/12 124/12 124/12 126/1         cascading [1] 164/16         92/22 103/19 122/12         62/1           119/2 175/7         130/18 131/25 132/6         cascading [1] 164/16         92/22 103/19 122/12         62/1           126/1         132/18 133/1 133/24         55/16 55/25 63/11         134/15 135/6 135/16         125/1 128/9 132/4         chasing [2] 24/18           132/1         133/124         55/16 55/25 63/11         134/15 137/6 137/9         125/1 128/9 132/4         chasing [2] 24/18           2aller [1] 142/22         134/15 137/9 138/10         137/1 79/25 00/95/25         188/8 191/4 192/13         148/12 52/78           2alls [48] 171/11 17/14         155/20 151/1 152/19 157/10 158/25         229/12 228/25         89/16 125/7 188/7         220/10 229/6 229/10           15/2 17/8 17/11 142/12         155/20 161/1 166/4         229/2 229/9 229/9         20/11 122/21 47/1         220/10 229/6 229/10         creating [2] 59/23         178/22 227/24           31/18 8/15 93/24         187/2 187/21 188/5         88/18 91/15 91/74         creating [2] 51/97         checkel [3] 46/1         checkel [3] 46/1           05/8 106/3 105/15         193/19 196/18 199/11         cases [30] 86/8         91/15 91/7         12/22 82/2         20/14 22/27/24         20/14 22/17 92/22         20/14 21/7 92/22         20/14 22/17 92/22         20/14 22/17 92/24   |                       | 115/1 116/13 120//   |                      |                     |                       |
| 175/23       181/6       181/14       130/18       133/25       155/16       55/25       63/10       131/15       135/16       133/24  |                       | 121/12 124/12 126/1  | cascading [1] 164/16 |                     |                       |
| 182/6       132/18 133/1 133/24       55/16 55/25 63/11       134/15 135/16 135/18       44/13         caller [1] 42/22       134/12 136/55 137/1       33/17 64/10 64/21       153/23 163/24 171/8       check [13] 43/20         caller [1] 62/2       134/12 136/55 137/1       33/17 64/10 64/21       153/23 163/24 171/8       check [13] 43/20         g/5 10/20 11/1 14/20       138/21 139/10 140/13       118/16 198/6 198/7       194/5 201/16       114/10 140/24 152/19         15/2 17/14 17/14 24/24       159/20 161/1 166/4       229/2 229/9 229/12       centres [4] 88/15       207/8 214/6 217/12         15/2 17/14 181/7       159/20 161/1 166/4       229/2 229/9 229/12       centres [4] 88/15       102/11 122/2 14/77         160/7 168/14 171/14       cases [15] 65/6 73/3       67/19 70/2 72/2 82/20       178/2 82/19       208/4         105/6 105/13 105/15       189/1 189/19 190/8       89/18 91/15 94/21       192/9       208/4       checkel [3] 46/1         105/6 105/13 105/15       191/6 191/7 191/8       117/18 137/7 76/1       23/10 26/24 94/13       14/14       checklistings [1]         105/6 105/11 122/11       192/19 193/21 391/5       107/14 72/24       117/2 172/17       checklistings [1]       14/14         106/7 168/14 177/11 20/24       191/9 191/1       167/14 72/14       18/20 188/21 189/24       165/8  |                       |                      | case [24] 33/4 39/10 | 125/1 128/9 132/4   | chasing [2] 24/18     |
| caller [1]         142/22         134/12         136/17         137/15         137   |                       |                      |                      |                     | 44/13                 |
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| calls [49]         1/11 4/18         1/30/12 1/39/10 140/13         1/30/12 1/39/10 140/13         1/30/12 1/30/17         1/30/12 1/30/17         <  |                       |                      |                      |                     |                       |
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| 15/2       1/3  |                       |                      |                      |                     |                       |
| 17/14       17/14       166/7       168/14       171/14       cases [15]       65/6       73/3       67/19       70/2       72/2       82/20       178/22       22/7/24         83/12       83/16       82/19       175/2       182/10       184/17       73/11       73/11       78/17       73/11       18/17       73/21       18/2       177/2       18/27       177/2       18/27       18/17       18/17       18/17       18/17       18/17       18/17       18/17       18/17       18/17       18/17       18/17       18/17       19/27       19/27       19/27       20/2       20/8/4       checklistings [1]       14/14       12/18       18/17       15/11       10/2       10/2       12/18       12/18       12/18       12/18       12/18       12/18       11/2       12/18       12/18       12/17       12/18       12/17       12/18       12/17       12/17       12/18<  |                       |                      |                      |                     |                       |
| 34/2 18/14         175/2 18/10 184/17         73/11 78/17 78/25         102/11 122/22 147/7         checking [2] 59/23           82/4 82/6 82/13 82/19         187/2 187/21 188/5         88/18 91/15 94/21         102/11 122/22 147/7         checking [2] 59/23           105/6 105/13 105/15         199/16 191/7 191/8         117/18 137/7 166/1         23/10 26/25 49/13         14/14           107/21 110/12 126/23         191/6 191/7 191/8         117/18 137/7 166/1         23/10 26/25 49/13         14/14           107/21 110/12 126/21         193/19 196/18 199/11         cash [30] 8/6 8/9         81/4 93/5 102/6         12/18 82/17 92/22           135/20 135/20 136/3         200/14 201/17 202/24         67/23 77/6 81/22 84/8         102/16 110/4 140/5         Chescking [2] 72/1 72/17           146/4 156/4 173/11         200/25 211/17 21/21         137/4 188/6 188/7         158/17 158/20 159/25         Chose [2] 218/10           222/5         215/5 215/6 215/11         190/2 190/20 191/12         216/19 218/13 219/5         191/8 191/10 191/12         182/2 188/24 188/24         165/7         Chose [2] 18/15         149/3           21/11 21/11 26/21         221/5 221/20 229/23         192/2 192/15 192/12         191/4 191/5 191/7         casting [2] 122/5         Chose [2] 14/17         148/15         149/3           21/11 21/12 44/11 72/24         23/03 21/20 220/18 228/15<   |                       |                      |                      |                     |                       |
| 182/1 82/15 93/24       187/2 187/21 188/5       88/18 91/15 94/21       192/9       208/4         105/6 105/13 105/15       189/1 189/19 190/8       94/25 95/15 97/24       certainly [25] 14/9       checklistings [1]         105/6 105/13 105/15       191/6 191/7 191/8       117/18 137/7 166/1       23/10 26/25 49/13       14/14         107/21 110/12 126/22       193/19 196/18 199/11       cash [30] 8/6 8/9       81/4 93/5 102/6       12/18 82/17 92/22         201/12 201/17 202/24       67/23 77/6 81/22 84/8       102/16 110/4 140/5       Chief [3] 72/1 72/17         135/20 135/20 136/3       200/14 201/17 202/24       67/23 77/6 81/22 84/8       102/16 110/4 140/5       Chief [3] 72/1 72/17         146/4 156/4 173/11       183/15 193/4       206/25 211/17 21/21       137/4 188/6 188/7       158/17 158/20 159/25       chose [2] 218/10         222/5       200/14 201/17 202/24       190/2 190/20       191/4 191/5 191/7       certainly [1] 47/11       147/21 229/21         21/11 21/11 26/21       221/5 221/20 225/15       191/4 191/5 191/7       certainly [1] 47/16 14/8       149/3       230/13       230/13       230/13       230/13       230/13       193/7 194/4 194/5       165/7       chose [3] 103/4         226/19       21/15 221/20 225/15       191/8 191/10 191/12       cestaing [2] 122/25       cinca [4] 67/21 67/23<  |                       |                      |                      |                     |                       |
| 189/1         189/1         189/1         94/25         95/15         97/24         certainly [25]         14/9         checklistings [1]           105/6         105/3         110/3         105/3         105/3         105/3         105/3         105/3         105/3         105/3         105/3         1103/4         14/14         105/3         105/3         105/3         105/3         105/3         105/3         105/3         1103/4         105/3         105/3         116/3         105/3         105/3         116/3         105/3         105/  |                       |                      |                      |                     |                       |
| 105/18       105/17       191/6       191/7       191/7       191/8       117/18       137/7       166/1       23/10       26/25       49/13       14/14       Chesterfield [4]       11/2         107/21       110/12       126/22       127/1       133/15       139/19       196/18       199/11       cash [30]       8/6       8/9       81/4       93/5       102/16       110/14       12/18       82/17       92/22         135/20       135/20       135/20       135/20       135/20       135/20       135/20       136/20       12/14       14/14       Chesterfield [4]       11/2         146/4       156/4       173/11       203/12       205/6       206/12       89/6       90/11       123/11       145/8       148/24       165/8       170/20       186/23       23/18       23/   |                       |                      |                      |                     |                       |
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| 99/9 100/9 100/13                         |   | I chose [1] 218/10                           | I found [1] 96/19                   | I please [1] 2/23                        |
| 101/15 102/21 102/22                      | hub [2] 33/24 33/25                       | I come [1] 146/18                            | l got [1] 103/3                     | l presume [1] 59/12                      |
| 103/17 109/19 116/8                       | Huddersfield [1]                          | I complete [2] 123/6                         | l guess [7] 13/24                   | I previously [1] 53/13                   |
| 118/13 122/18 122/24                      | 121/22                                    | 130/14                                       | 13/25 72/9 139/13                   | I probably [1] 173/8                     |
| 124/15 124/22 128/10                      | huge [3] 77/4 77/9                        | I could [3] 46/10                            | 139/21 146/22 153/18                |  |
| 129/25 130/10 131/3                       | 232/4                                     | 147/17 213/6                                 | I had [11] 7/12 7/16                | I read [1] 152/5                         |
| 131/7 131/14 131/21                       |   | l couldn't [9] 21/7                          | 38/7 46/14 58/1 61/7                | I realised [1] 207/24                    |
| 132/4 132/15 133/2                        | 112/6 151/9 153/3                         | 93/8 128/1 139/6                             | 80/8 93/18 143/14                   | I really [2] 127/19                      |
| 133/3 133/6 134/5                         | 196/21 196/25 199/13                      |  | 212/25 217/25                       | 208/11                                   |
| 136/4 136/11 136/16                       | human [3] 100/10                          | 182/18 184/20                                | I have [14] 2/13 46/1               | I recall [4] 14/18                       |
| 137/17 138/2 139/3<br>140/7 140/17 140/17 |   | I dealt [1] 118/6                            | 48/9 89/25 96/13 97/1               |  |
| 140/17 140/17 140/17 140/17               | hundreds [1] 109/19                       |  | 178/22 201/1 203/6                  | I received [1] 68/6                      |
| 145/6 148/25 150/4                        |   | 74/11 95/24 103/12                           | 214/1 214/15 214/20                 | l recognise [1]                          |
| 150/5 165/2 166/5                         | <u> </u>                                  | 128/19 129/15 159/8                          | 217/1 225/2                         | 159/11                                   |
| 167/17 175/11 175/19                      | I accept [1] 221/12                       | 208/16 230/21                                | I honestly [1] 210/21               | I recollect [1] 126/15                   |
| 182/19 186/16 186/25                      | agreed [1] 30/20                          | I didn't [14] 7/16 15/4                      | I hope [1] 115/2                    | I regret [1] 49/25                       |
| 190/9 190/13 190/24                       | also [2] 00/0 211/21                      |  | I imagine [2] 111/20                | I remember [12] 7/5                      |
| 191/25 192/13 192/16                      | I am [11] 3/22 44/19                      | 107/9 118/8 145/17                           | 115/20                              | 68/10 98/10 114/5                        |
| 194/8 195/5 196/16                        | 40/19/14/14 119/12                        | 161/16 184/13 184/18                         |                                     | 118/13 140/21 155/12                     |
| 197/10 198/1 198/16                       | 121/17 177/9 179/3                        | 229/1 231/13 233/10                          | 228/16                              | 160/9 165/4 187/6                        |
| 199/4 199/9 206/3                         | 195/14 214/14 225/3                       | I do [18] 3/6 35/7                           | l joined [2] 20/13                  | 212/20 213/10                            |
| 206/7 218/1 218/7                         | l and [1] 208/5                           | 48/23 86/20 90/24                            | 103/3                               | I remembered [1]                         |
| 218/17 218/25 220/10                      | I apologise [1] 167/5<br>I appreciate [2] | 113/12 125/24 128/18                         |                                     | 181/7                                    |
| 220/24 221/17 223/9                       | 125/25 232/3                              | 133/10 138/17 145/24<br>159/15 165/9 176/10  |                                     | I said [2] 33/19 118/5                   |
| 225/5 225/9 225/21                        | l ask [5] 115/5                           | 179/8 179/9 181/2                            | 232/13 232/15                       | I saw [1] 207/23<br>I say [20] 19/8 20/4 |
| 226/6 226/17 226/21                       |   |  | l kind [1] 15/14<br>I knew [2] 87/6 | 27/16 50/14 53/9                         |
| 228/9 231/23                              |   | <b>I don't [81]</b> 7/4 14/24                | 138/19                              | 55/20 57/21 69/24                        |
| hours [5] 49/7 153/8                      | l asked [1] 167/6                         | 16/11 16/13 18/16                            | I know [13] 3/14 6/17               | 77/15 84/12 84/18                        |
| 153/23 183/4 202/10                       | l assume [1] 105/24                       | 26/20 29/1 31/16                             | 41/25 48/14 67/12                   | 84/22 89/7 95/7 96/20                    |
| House [1] 163/22                          | I became [1] 9/1                          | 34/16 35/5 35/12                             | 106/16 110/5 139/10                 | 114/23 149/13 162/10                     |
| how [63] 6/17 13/8                        | I believe [26] 19/21                      | 35/21 38/9 40/8 51/8                         | 148/5 175/18 180/20                 | 185/17 186/4                             |
| 15/3 33/13 35/17                          | 21/25 22/11 28/15                         | 51/12 52/8 59/1 59/23                        |                                     | I see [2] 81/8 151/25                    |
| 35/22 36/4 40/12                          | 29/15 33/9 35/4 37/22                     | 60/15 60/25 61/3 65/8                        |                                     | I seem [1] 157/23                        |
| 40/15 44/22 51/6                          | 43/10 48/2 56/20 61/1                     | 68/14 69/24 71/23                            | I managed [1] 114/12                |  |
| 51/13 52/6 61/20 71/5<br>75/21 81/17 83/3 | 63/12 85/15 88/5                          |  | I may [4] 49/12 120/7               |  |
| 83/22 84/3 84/16 88/1                     | 90/17 97/12 101/13                        | 103/6 108/2 108/21                           | 181/17 232/18                       | 119/16 151/11 215/10                     |
| 93/1 94/9 104/15                          | 112/8 119/7 131/13                        | 111/6 113/12 114/5                           | I mean [23] 9/19 17/6               |  |
|   | 163/19 181/9 223/4                        | 114/7 114/13 114/25                          | 21/11 26/9 35/12                    | I spoke [2] 26/16                        |
|   |   |  |                                     |  |
| L   | 1   |  | 1                                   | (73) Horizon - I spoke                   |

| I                      | 230/13 231/21 233/10       | 229/11                    | 181/3 183/9 208/5             | 107/3 107/12 111/2    |
|------------------------|----------------------------|---------------------------|-------------------------------|-----------------------|
| I amaka 141 07/17      |                            | I wouldn't [4] 63/14      | 213/22 214/10 229/22          | 115/2 115/5 115/12    |
| I spoke [1] 27/17      | 15/25 45/6 51/24           | 69/18 164/20 182/8        | 230/5 232/7                   | 115/19 116/15 117/9   |
| I started [1] 127/16   | 162/11 181/15 230/13       |                           | lan [2] 148/4 149/5           | 120/7 121/8 126/11    |
| I stated [1] 97/9      |                            | <b>I'd [35]</b> 1/6 16/19 | <b>IBM [3]</b> 102/17         | 131/17 131/19 132/5   |
| I still [3] 19/5 118/8 | I took [1] 62/17           | 19/25 20/14 24/19         | 102/21 103/4                  | 133/13 133/21 133/24  |
| 206/8                  |                            |                           |                               | 134/19 135/8 135/12   |
| I strongly [1] 221/17  | I understand [3]           |                           | ICL [2] 132/2 132/21          | 136/10 136/12 137/10  |
| I suppose [1] 139/13   | 121/21 129/14 213/24       |                           | ICL Pathway [1]<br>132/21     |                       |
| I suspect [2] 78/8     | l understood [2] 7/8       | 118/9 120/17 129/9        |                               | 137/16 140/10 143/1   |
| 202/4                  | 22/16                      | 131/23 138/13 147/18      |                               | 147/21 147/24 147/24  |
| I take [1] 42/4        | I visited [2] 43/13        | 147/22 152/5 174/18       | <b>ID [9]</b> 85/2 89/10 90/4 | 147/25 147/25 150/23  |
| I tell [1] 214/23      | 176/12                     | 178/1 178/2 180/2         | 91/12 92/8 92/16              | 152/7 152/16 152/18   |
| I then [1] 108/24      | I want [6] 34/7 63/5       | 181/15 181/15 183/25      | 92/18 95/24 96/17             | 152/19 152/21 152/24  |
| I think [159] 2/10     | 124/19 145/19 175/1        | 184/5 185/19 205/21       | idea [4] 5/6 82/19            | 156/6 156/13 156/19   |
| 2/19 5/12 7/7 10/18    | 187/1                      | 206/19 210/20 214/11      | 107/22 195/24                 | 156/21 157/2 158/3    |
| 13/2 13/21 15/14       | I wanted [4] 6/4           | 228/18 233/13             | ideally [4] 101/1             | 158/19 159/5 162/13   |
| 16/12 16/17 17/1 17/5  | 80/21 159/18 233/20        | I'II [15] 3/21 63/20      | 150/22 186/4 186/8            | 163/15 163/25 165/15  |
| 18/10 18/15 18/18      | I was [48] 2/11 5/16       | 91/10 104/19 105/4        | identifiable [1] 16/2         | 166/20 167/5 167/20   |
| 18/23 19/4 20/13       | 9/1 9/25 14/9 15/8         | 120/21 132/20 134/12      |                               | 168/4 169/9 171/10    |
| 20/24 21/3 22/13       | 24/22 25/6 28/20           | 145/21 169/10 182/15      |                               | 172/17 173/19 176/17  |
| 23/15 25/5 25/7 25/9   | 30/14 30/21 31/19          | 184/4 214/6 215/7         | 88/24 89/3 91/14              | 177/1 177/17 179/12   |
| 26/1 26/11 26/20       | 35/8 35/14 39/1 41/5       | 234/3                     | 94/20 96/21 101/3             | 179/16 180/11 181/22  |
| 27/11 27/23 28/10      | 45/5 47/18 47/19           | l'm [113] 3/18 4/2        | 156/19 183/18 193/14          | 181/24 182/2 182/25   |
|                        | 50/15 53/11 56/19          | 9/11 9/23 15/12 16/3      | 194/15 194/18                 | 187/8 187/15 188/2    |
| 30/9 30/16 30/20       | 57/6 71/2 72/3 78/21       | 18/18 19/9 20/1 23/21     | identify [13] 22/13           | 188/19 189/1 189/3    |
| 31/16 31/23 31/25      | 79/10 82/9 85/20 86/6      | 23/24 34/5 35/21          | 53/15 81/24 82/3              | 189/10 190/16 191/18  |
| 32/10 33/17 33/19      | 97/11 102/3 114/8          | 35/25 37/24 40/24         | 94/10 105/6 110/20            | 191/22 193/19 195/1   |
| 33/20 34/11 35/10      | 114/13 116/21 124/15       | 40/25 41/6 42/14          | 110/22 150/22 161/7           | 196/14 201/4 201/15   |
| 35/15 36/14 38/3       | 136/8 147/10 159/9         | 45/10 48/10 55/23         | 171/3 195/4 199/22            | 201/17 202/1 203/16   |
| 38/10 38/15 38/17      | 180/7 180/9 181/10         |                           |                               | 206/12 206/20 206/25  |
| 39/21 44/1 50/2 50/14  | 186/14 202/6 206/21        | 92/24 93/21 96/24         | identities [1] 196/24         | 207/19 209/3 213/11   |
| 54/25 55/20 57/5 57/7  | 210/5 218/9 223/10         | 97/11 97/18 104/3         | <b>IDs [1]</b> 194/15         | 214/4 214/18 214/20   |
| 57/8 57/13 59/4 59/9   | <b>I wasn't [14]</b> 19/14 | 104/5 104/13 105/3        | ie [7] 58/20 76/25            | 215/21 215/23 217/5   |
| 63/13 68/6 69/10       | 21/6 23/21 60/16 67/4      | 106/16 108/2 111/17       | 112/21 153/23 161/6           | 217/8 217/9 218/24    |
| 69/17 71/15 80/7       | 67/5 74/21 83/1 83/18      |                           | 171/10 197/9                  | 219/9 219/12 220/5    |
| 80/19 80/19 81/3       | 84/12 103/5 103/12         | 117/4 118/20 119/10       | ie it's [1] 112/21            | 220/13 220/20 221/14  |
| 81/14 83/9 89/7 89/8   | 213/16 231/12              | 122/22 126/11 127/4       | ie more [1] 58/20             | 221/19 222/3 224/2    |
| 89/24 90/5 94/23 97/9  | I went [5] 127/6           |                           | ie Post [1] 76/25             | 224/17 224/18 224/20  |
| 98/21 102/5 102/14     | 177/22 178/16 181/5        | 138/7 138/16 139/6        | ie the [1] 161/6              | 225/4 225/9 226/1     |
| 102/24 103/16 103/23   | 221/24                     | 140/10 141/2 145/9        |                               | 226/3 226/3 228/17    |
| 109/11 111/25 115/16   |                            |                           | ie we're [1] 197/9            | 229/22 230/12 230/24  |
| 116/4 118/3 118/5      | I were [1] 6/3             |                           | ie would [1] 153/23           |                       |
| 118/21 122/21 127/3    | I will [2] 195/8 219/11    | 151/6 152/6 152/16        | if [205] 3/7 6/3 6/7          | 232/11 232/18 232/25  |
| 127/4 127/5 128/5      | I won't [2] 96/25          | 152/21 158/13 160/5       | 6/10 6/11 6/19 6/20           | 233/8                 |
| 130/20 131/2 138/4     | 211/9                      |                           | 7/12 7/14 7/16 8/5 9/7        |                       |
| 140/15 140/16 140/19   | I worked [2] 226/23        | 163/19 164/8 164/8        | 12/6 15/19 15/22              | imagine [9] 72/11     |
| 140/19 140/22 140/24   | 232/8                      | 165/13 168/23 171/12      |                               |                       |
| 141/9 143/14 146/18    | I would [56] 19/9          | 175/6 176/7 183/11        | 27/25 28/8 29/6 32/3          | 111/20 115/18 115/20  |
| 146/22 148/12 150/5    | 19/12 24/11 24/14          | 184/17 184/20 185/4       | 32/10 32/13 39/2              | 134/16 233/14         |
| 151/22 151/23 152/18   | 24/25 26/25 41/23          | 185/6 193/13 194/22       | 39/11 39/13 39/14             | immediately [3]       |
| 155/10 155/10 157/8    | 42/13 50/3 50/20           | 198/23 198/24 201/13      |                               | 178/18 181/7 219/12   |
| 160/22 162/24 163/9    | 53/19 55/12 56/9 57/7      | 202/19 203/1 203/6        | 42/21 46/21 48/11             | imminent [1] 57/10    |
| 164/2 164/9 166/11     | 57/21 57/24 61/4           | 205/2 206/2 206/2         | 49/3 50/3 50/22 51/4          | impact [31] 50/22     |
| 166/20 167/10 167/13   | 64/14 64/23 71/3           | 206/8 211/15 212/7        | 51/25 52/1 52/4 52/8          | 70/9 70/10 73/3 75/14 |
| 173/11 174/1 177/17    | 72/11 79/21 82/14          | 212/18 213/20 213/21      | 52/12 57/17 57/22             | 76/13 77/2 78/10      |
| 182/11 183/21 183/22   | 83/9 83/20 93/4 94/25      |                           | 61/7 63/24 64/4 64/5          | 78/16 79/17 86/6 88/9 |
| 183/23 186/4 186/8     | 95/2 99/4 106/4 106/9      |                           | 67/24 69/6 69/14              | 89/14 89/16 89/17     |
| 186/17 189/24 199/12   | 107/12 115/18 117/18       |                           | 70/19 73/20 74/11             | 89/18 94/17 95/20     |
| 200/14 201/23 202/3    | 118/23 126/23 130/13       |                           | 74/23 77/19 79/19             | 132/23 154/25 155/6   |
| 203/2 204/9 205/4      | 131/16 132/12 134/9        | 233/24 234/2 234/3        | 82/14 82/15 83/7              | 155/8 155/21 169/25   |
| 208/23 212/16 214/12   | 134/16 142/16 144/14       |                           | 83/13 83/25 84/19             | 171/2 193/21 200/12   |
| 218/19 219/6 219/17    | 146/2 159/14 164/21        | 35/4 69/7 69/20 69/24     | 89/12 89/21 90/10             | 200/18 209/22 231/9   |
| 219/24 224/12 225/13   | 168/19 170/21 177/23       |                           | 90/25 91/1 95/19 96/7         | 232/3                 |
| 226/7 226/9 226/13     | 185/22 204/25 207/9        | 111/8 128/5 139/14        | 99/1 100/15 100/19            | impacted [13] 49/15   |
|                        | 214/19 223/16 226/25       | 157/22 159/19 167/21      | 102/10 106/4 106/7            | 50/23 53/10 56/3 84/3 |
|                        |                            |                           |                               |                       |
| L                      |                            |                           |                               | (74) I spoke impacted |

(74) I spoke ... - impacted

| I   | 146/5 148/7 151/5                          | 142/11 154/11 155/14                         | intended [2] 159/4                           | 168/10 182/19 184/1                    |
|---|--|--|--|--|
| impacted [8] 84/4                           | 153/15 153/17 154/3                        | 158/10 161/25 162/21                         |  | 187/20 191/7 195/7                     |
| 88/11 88/16 89/24                           | 154/22 155/5 162/5                         | 163/11 163/17 164/16                         |  | 195/21 197/16 204/17                   |
| 90/20 113/15 171/1                          | 170/17 174/7                               | 165/2 165/8 166/5                            | intentionally [6]                            | 205/18 209/11 217/16                   |
| 180/8                                       | include [1] 160/22                         | 167/8 168/18 171/8                           | 68/19 68/24 68/24                            | 222/18 222/23 227/6                    |
| impacting [3] 67/21                         | included [6] 52/2                          | 212/22 213/5 213/9                           | 69/5 69/7 69/16                              | introduced [5] 28/5                    |
| 93/13 133/15                                | 106/3 131/6 168/16                         | 217/1 219/9 222/8                            | interact [6] 25/1                            | 28/13 142/14 187/20                    |
| Impacts [1] 88/11                           | 173/10 200/16                              | 222/25 223/2 225/3                           | 132/15 144/6 149/17                          | 187/22                                 |
| implement [2] 20/6                          | includes [2] 1/10                          | informed [8] 2/11                            | 161/25 162/12                                | introducing [1]                        |
| 208/3                                       | 230/18<br>including [4] 97/24              | 80/1 92/6 92/11<br>143/10 162/3 202/7        | interacting [1] 219/3<br>interaction [9] 8/3 | 103/18<br>introduction [4]             |
| implementation [3]                          | 128/20 166/25 202/22                       |  | 9/24 74/5 74/14                              | 122/17 122/24 142/12                   |
| 18/4 18/8 60/17                             | incommunicado [1]                          | informing [3] 75/24                          | 108/18 112/20 133/11                         | 169/1                                  |
| implemented [3]                             | 194/1                                      | 92/15 163/1                                  | 166/14 176/23                                | investigate [11] 37/2                  |
| 53/12 100/5 138/25                          | incomplete [2]                             | infrequent [1] 142/10                        |  | 42/13 64/5 135/3                       |
| implementing [1]<br>129/11                  | 203/12 203/24                              | inherent [1] 80/17                           | 37/17 65/9 78/23                             | 140/5 162/14 165/4                     |
| implications [4]                            | inconceivable [1]                          | inhibit [1] 104/23                           | 115/19 133/23                                | 177/4 219/11 219/13                    |
| 75/23 77/4 77/9                             | 119/19                                     | initial [4] 143/17                           | interested [4] 44/21                         | 227/7                                  |
| 213/14                                      | inconclusive [1]                           | 169/2 194/2 217/22                           | 48/19 117/4 177/11                           | investigated [6] 1/24                  |
| important [7] 42/22                         | 165/15                                     | initially [4] 11/16                          | interested in [2]                            | 30/16 40/5 40/11                       |
| 102/8 125/21 131/15                         | inconsistencies [1]                        | 182/6 186/13 210/8                           | 48/19 117/4                                  | 156/8 225/16                           |
| 162/4 178/12 179/9                          | 193/4                                      | initials [1] 115/23                          | interesting [1]<br>227/10                    | investigating [3]<br>19/19 20/6 20/21  |
| impression [7] 71/5                         | inconsistent [1]<br>152/24                 | initiated [1] 91/16<br>initiatives [1] 33/1  | interface [6] 132/3                          | investigation [14]                     |
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| 72/24 73/1 73/10                            | 181/17 188/13 189/8                        | 148/22                                       | 157/5 171/21                                 | 65/17 135/5 166/17                     |
| improve [3] 13/19                           | 202/15                                     | input [7] 22/21 39/4                         | interim [1] 46/19                            | 167/24 199/17 223/3                    |
| 18/21 34/19                                 | incorrectly [2]                            | 100/11 100/25 101/5                          | internal [17] 55/11                          | 223/14 223/18 224/6                    |
| improved [10] 19/4<br>19/8 19/23 20/9 95/22 | 101/16 219/4                               | 132/11 134/4                                 | 56/11 71/19 84/24                            | 229/13 229/17                          |
| 96/7 96/17 140/1                            | increase [1] 147/6                         | inputting [2] 101/14                         | 90/19 92/6 92/11                             | investigations [4]                     |
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| improvement [2]                             | 147/23 218/22                              | inquiries [1] 140/23                         | 145/18 147/13 149/24                         | 225/19                                 |
| 19/7 32/1                                   | indeed [7] 104/8                           | Inquiry [19] 1/6 1/13                        | 166/8 201/24 206/14                          | investigative [2]                      |
| improvements [6]                            | 104/22 105/17 109/6<br>109/11 117/13 177/7 | 2/7 4/3 70/16 85/6<br>96/11 104/7 119/14     | 213/8  | 222/13 223/7                           |
| 18/19 20/2 20/3 22/3                        | independent [3]                            | 120/12 120/16 121/17                         | internally [2] 145/13 229/5                  | investigators [3]<br>56/13 56/18 65/6  |
| 28/21 33/4                                  | 124/4 202/18 230/18                        | 150/14 190/14 201/9                          | interpretation [3]                           | involve [7] 4/17 8/3                   |
| improving [1] 100/2                         | indonondontly [1]                          | 201/19 209/7 216/4                           | 64/12 64/13 64/14                            | 10/5 143/25 144/1                      |
|   | 143/23                                     | 231/5  | interpreted [2] 211/1                        | 144/3 144/7                            |
| 15/8 24/7 25/6 49/18                        | indicate [1] 146/13                        | insert [5] 205/13                            | 228/16                                       | involved [42] 4/18                     |
| 50/11 57/15 65/21<br>85/13 86/4 87/14 88/2  | indicated [1] 47/20                        | 205/17 206/1 206/17                          | interspersed [2]                             | 10/22 11/15 28/20                      |
| 88/22 88/22 89/5 89/5                       | indication [2] 200/11                      | 211/11                                       | 123/7 128/20                                 | 30/14 31/12 38/7                       |
| 90/11 90/17 95/8                            | 222/16                                     | inserted [1] 210/11                          | intervening [2] 15/16                        | 50/10 60/10 63/17                      |
| 105/11 105/12 106/2                         | indicators [1] 161/9                       | inserting [1] 209/10                         | 20/4   | 65/5 65/11 65/24                       |
| 106/25 107/10 108/6                         | individual [7] 29/20                       | insofar [2] 207/7                            | intervention [6]<br>36/20 36/22 37/6 37/9    | 69/20 69/25 81/18<br>82/18 83/18 84/12 |
| 110/10 111/1 127/13                         | 43/1 112/4 122/9<br>125/14 164/21 211/23   | 222/15                                       | 166/10 222/22                                | 82/18 83/18 84/12<br>84/16 85/22 93/6  |
| 127/24 132/17 134/20                        | individuals [11]                           | installed [1] 225/11                         | interventions [1]                            | 94/20 102/3 102/20                     |
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(88) simple... - statement

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| 12.10         12.10         12.01 <td< td=""><td></td><td></td><td></td><td></td><td></td></td<>   |   |                       |                       |                      |                      |  |
| 1289         129/16         11/2         129/16         11/2         129/16         121/2 <td< td=""><td></td><td></td><td></td><td></td><td></td></td<>   |   |                       |                       |                      |                      |  |
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| statung [1]         strategic ally [2]         strategic [1]         strategic [2]         constrategic [2] <thconstrategic [2]<="" th=""></thconstrategic>  |   |                       |                       |                      |                      |  |
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| states [1] 125/15         strates [1] 81/20         strates [1] 81/20 <th co<="" td=""><td></td><td></td><td></td><td></td><td></td></th>  | <td></td> <td></td> <td></td> <td></td> <td></td> |                       |                       |                      |                      |  |
| Step [2]         129/20         213/18 219/9         surface [1]         517/9           140/8         steens [1]         125/20         surface [1]         517/9         139/20         133/16           104/1         104/2         strems [1]         126/10         surface [1]         518/10         130/13           104/1         104/2         235/6         surface [1]         21/18         surprising [1]         138/10         138/10           126/2         21/19         surface [1]         21/18         surprising [1]         23/18         138/20         138/21         138/20         138/21         138/21<   |   |                       |                       |                      |                      |  |
| steeper [1]         25/20         streams [1]         81/20         surplus [2]         188/10         139/21         139/21         139/21           Stein [4]         103/23         strength [1]         124/10         surplus [2]         188/10         139/24         193/24 <td></td> <td>139/20</td> <td></td> <td></td> <td></td>  |   | 139/20                |                       |                      |                      |  |
| Stein [4]         103/12         103/12         103/12         103/12         103/12           104/1104/2235/6         stifle [3]         5/17         suffered [1]         23/16         surfsing [1]         13/16         surfsing [1]         13/16           28/22         22/23/2         Strong [1]         22/3/5         surfsing [1]         14/10         12/5/4         13/5/16  |   |                       |                       |                      |                      |  |
| 104/11/104/2 235/6       strike 13       50/12 6/13       sturp 12/14       sturp 13/14       10/15       sturp 13/14       10/15       10/15       sturp 13/14       10/15  |   |                       |                       |                      |                      |  |
| stems [1]         TRN [1]         30/9         sufficient [2]         222/2         125/8         136/7         161/15         171/10         188/19         197/10         171/20         188/19         197/10         171/20         188/19         199/12         125/8         136/7         161/15         171/15         171/20         188/19         199/12         171/10         171/20         188/19         199/19         171/20         188/19         199/19         171/20         188/19         199/19         171/11         171/20         188/19         199/19         171/11         171/20         188/19         189/19         189/13         180/12         180/12         180/12         180/12         180/12         180/12         180/12         180/12         180/13         180/13         180/13         180/13         180/13         180/13         180/13         180/13         180/13         180/13         180/13         180/13         180/13         180/13         180/13         180/13         180/13         180/14         180/13         180/14         180/13         180/14         180/14         180/14         180/14         180/14         180/14         180/14         180/14         180/14         180/14 <th180 16<="" th=""> <th180 16<="" th=""> <th180 1<="" td=""><td></td><td></td><td></td><td></td><td></td></th180></th180></th180>  |   |                       |                       |                      |                      |  |
| Step [6]         1/119         224/5         Suggest [6]         220/5         Suggest [6]         220/2         220/1         30/2  |   |                       |                       |                      |                      |  |
| 28/22 29/1 / 223/19         strongly [1] 221/17         suggest [6] 2/20         suspect [4] 46/14         table [2] 161/6           11/12 43/21 58/8         strongly [1] 233/13         strongly [1] 261/7 26/7         11/12 43/21 58/8         suspect [4] 46/14         tabs [1] 60/12           3teps [1] 261/7 26/7         strouggling [2] 82/2         suggesting [3] 57/9         216/17         tactic [2] 99/12 99/12           26/32 27/6 27/7 27/19         struck [2] 28/8 189/12         suggesting [3] 57/9         suspending [1]         tactic [2] 99/12 99/12           13/14 195/3         struck [2] 28/8 189/12         suggesting [3] 57/9         suspension [1]         tactic [2] 99/12 99/17           13/17 8         suggest [2] 47/9         28/17         tactic [2] 99/12 99/12         tactic [2] 99/12 99/12           120/11 232/17 235/12         Suick [2] 28/8 189/12         suick [2] 28/8 189/12         suspension [1]         tactic [2] 99/12 99/12           120/11 232/17 235/12         Suiper [3] 58/9         suip[4] 41/22 41/23         swapping [2] 133/12         22/2/3           13/16 3187/8         suipostmaster [19]         55/17 80/1         swapping [2] 133/12         22/2/3           20/11 29/12 39/12         58/3 97/18 100/20         summarises [1]         Swindon [2] 18/8         214/23 218/13/22/1           20/17 27/19 102/2         136/22 151/18 173/19  |   |                       |                       |                      |                      |  |
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| steps [1]         210/17         220/17         Tait [1] 99/20         Tait [1] 99/20         Tait [1] 99/20         Tait [1] 93/20         Tait [1] 93/21         220/16         Swapping [2] 133/12         221/16         Swapping [2] 133/12         221/13         221/15         Swapping [2] 133/12         221/13         221/15         Swapping [2] 132/12         120/22   |   |                       | 220/21 221/18         | suspending [1]       |                      |  |
| 26/23 27/6 27/7 27/19       10/19 72/16 80/18       196/11 22/1/4       Suspension [1]       12/14/14       12/14/14       12/14/14 <td></td> <td></td> <td></td> <td></td> <td></td>  |   |                       |                       |                      |                      |  |
| 30/19 6/19 1/9/12       127/1       103/13       suspension [1]       Tait [1] 33/9         184/14 195/3       stuck [2] 28/8 189/12       suggests [2] 47/9       228/17       swap [3] 43/21       42/14       42/14 21/23       103/21 22/12 23/12         86/17       STEVENS [4] 120/9       120/11 23/21 7235/12       subject [3] 58/9       suitable [1] 167/25       swap [3] 43/21       40/4 42/4 49/7 54/18       62/5 62/7 74/8 78/3         810/13 187/8       subject [3] 58/9       subject [3] 58/9       suitable [1] 167/25       swapping [2] 133/21       126/23 128/8 133/17         180/13 187/8       subpostmaster [19]       6/3 8/12 38/4 40/18       summarise [4] 85/17       Swindon [2] 188/8       221/15       swindon [2] 188/8       223/12 224/17 227/6         59/17 67/19 102/8       13/52 15/18 173/17       136/22 15/118 173/19       229/16       symptoms [3] 150/15       227/19 230/25         20/12 29/12 39/25 200/7       208/10 211/4 211/4       210/6       summarise [1] 12/21 25/17 170/6       31/23 60/13 73/25         199/21 199/25 200/7       208/10 211/4 21/14       210/6       supplerentary [1] 12/12 155/17 170/6       103/10 105/18 105/17 92/0         231/16       subpostmasters [27] 3/21       32/21       32/21 12/22 12/24 22/24       suppler[1] 12/21 25/17 170/6         20/12 220/22       11/2 6/16 16/23 17/1   |   |                       |                       |                      |                      |  |
| 184/14 195/3       stuck [2] 28/8 189/12       suggests [2] 47/9       228/17       take [30] 12/21 23/12         86/17       SUE [1] 157/8       sub [1] 175/8       sub [1] 175/8       221/10 225/4       62/5 62/7 74/8 78/3         STEVENS [4] 120/9       sub [41] 157/8       sub [41] 167/2       sub [41] 167/2       221/10 225/4       86/17 74/8 78/3         Stewart [3] 48/4       sub [41] 190/22       submitted [1] 190/22       summarise [2]       221/15       swapping [2] 133/12       126/23 128/8 133/17         19/5 20/5 20/8 20/8       sub [41] 152/42       sub [41] 152/21 203/24       swapping [2] 133/12       126/13 168/8       221/15       126/13 168/8       221/16       swapping [2] 133/12       126/13 168/8       126/14 12/1         20/11 29/12 38/5 41/5       subpostmaster [1]       203/12 203/24       swim [1] 144/4       183/6 184/20       214/23 23/13       223/12 224/17 227/6         59/17 67/19 102/8       13/24 196/2 196/10       summarises [1]       swim [1] 60/10       symptoms [3] 150/15       14ke [3] (21 2 15/17 170/6       227/19 230/25         231/16       113/24 196/2 196/10       summarises [1] 12/21       13/24 24/44       13/12       13/23 60/13 73/25         231/15       subpostmasters [27] 3/21       31/14 43/14       11/12 16/16 16/23 17/11       support [41] 51/4 51/13       10/21 44/1  |   |                       |                       |                      |                      |  |
| Steve [3]         62/17         Su [1]         91/15         Sub [1]         175/8         Sub [1]         120/12         Sub [1]         120/12         120/12         121/12         126/13         121/12         126/13         121/12         126/13         121/12         126/13         121/12         126/13         121/12         121/15         Sup [1]         121/15         Sup [1]         121/12         126/13         121/15         Sup [1]         121/12         126/13         121/12         126/13         121/12         121/12         121/12         121/12         121/12         121/12         121/12         121/12         121/12         121/12         121/12         121/12         121/12         121/12         121/12         121/12         1  |   | atuak [2] 20/0 100/12 |                       |                      |                      |  |
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| Stewart [3] 48/4<br>180/13 187/8         Table 2 19321         Stafe 1 190/22           submitted [1] 190/22         submitted [1] 190/24         submitted [1] 190/24         submitted [1] 120/3         submitted [1] 120/3         submitted [1] 120/3         submitted [1] 120/3         supplementary [2] 77/21         supplementary [2] 77/21         supplementary [2] 77/21         supplementary [1] 192/24         supplementary [1] 192/24         supplementary [1] 108/11         supplementary [1] 122/12         supplementary [1] 108/11         supplementary [1] 122/12         s   |   | subject [3] 58/9      |                       |                      |                      |  |
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| still [29]       13/21       18/19       6/3       8/12       38/11       38/12       <  |   |                       |                       |                      |                      |  |
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| 20/11 29/12 38/5 41/5       43/15 98/3 99/6       summarises [1]       227/19 230/25         54/19 58/23 59/7       43/15 98/3 99/6       summarises [1]       229/16       sympathetic [1] 64/3       227/19 230/25         59/17 67/19 102/8       136/22 151/18 173/19       229/16       sympathetic [1] 64/3       227/19 230/25         124/23 194/23 197/25       136/22 151/18 173/19       208/10 211/4 211/14       210/6       sympathetic [1] 70/17       31/23 60/13 73/25         199/21 199/25 200/7       208/10 211/4 211/14       210/6       summary [2] 77/21       31/15       suppostmaster's [1]       31/21         subpostmasters [27]       1/12 16/16 16/23 17/1       supplementary [1]       31/21       synthesised [1]       103/10 105/18 105/19         31/16       11/12 16/16 16/23 17/1       11/12 16/16 16/23 17/1       supplier [4] 112/21       15/24 17/23 22/16       180/2 184/14 197/16         35/19 58/20 91/23       105/23 110/2 110/23       5/13 5/15 5/17 9/20       204/11 220/1 233/1       40/17         141/14 188/7 188/8       145/4 164/18 165/1       142/2 42/14 48/3       39/12 77/10 83/25       39/12 77/10 83/25         194/24 194/10 194/18       186/2 195/24 208/15       216/12 22/14 22/11       71/9 71/11 75/20 77/7       98/19 105/15 126/22         194/24 194/10 194/18       196/3 200/1 200/5  |   |                       |                       |                      |                      |  |
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(92) tough - used

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| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22  | wait [4] 120/23<br>136/18 195/7 195/20<br>waiting [3] 156/10<br>171/5 185/5<br>waiver [1] 214/16<br>Wales [4] 117/16<br>117/19 118/19 118/23<br>want [18] 21/18 22/6<br>34/7 42/10 63/5 66/6<br>69/18 84/15 100/20<br>115/8 124/19 145/19<br>152/25 168/10 175/1<br>187/1 199/6 208/19<br>wanted [5] 6/4 80/21   | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12  | 182/5 182/5 187/23<br>204/17 209/14 221/24<br>222/18 229/13<br>were [328]<br>weren't [10] 53/16<br>55/5 63/17 80/12<br>94/25 95/4 140/12<br>140/18 148/25 176/25<br>what [191] 2/20 4/16<br>5/3 6/7 7/8 7/9 7/17<br>8/24 10/4 10/22 11/15<br>11/19 13/23 15/12<br>15/18 16/8 16/13 17/1<br>18/12 18/18 21/5 22/9  | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] 30/7 174/6<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2   |
| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22<br>90/5<br>versus [2] 107/22<br>107/24   | wait [4] 120/23<br>136/18 195/7 195/20<br>waiting [3] 156/10<br>171/5 185/5<br>waiver [1] 214/16<br>Wales [4] 117/16<br>117/19 118/19 118/23<br>want [18] 21/18 22/6<br>34/7 42/10 63/5 66/6<br>69/18 84/15 100/20<br>115/8 124/19 145/19<br>152/25 168/10 175/1<br>187/1 199/6 208/19<br>wanted [5] 6/4 80/21<br>102/22 159/18 233/20   | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12<br>84/4 136/20 139/10  | 182/5 182/5 187/23<br>204/17 209/14 221/24<br>222/18 229/13<br>were [328]<br>weren't [10] 53/16<br>55/5 63/17 80/12<br>94/25 95/4 140/12<br>140/18 148/25 176/25<br>what [191] 2/20 4/16<br>5/3 6/7 7/8 7/9 7/17<br>8/24 10/4 10/22 11/15<br>11/19 13/23 15/12<br>15/18 16/8 16/13 17/1<br>18/12 18/18 21/5 22/9<br>24/3 32/9 33/2 34/12  | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] 30/7 174/6<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2<br>11/17 14/9 14/21 15/6  |
| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22<br>90/5<br>versus [2] 107/22   | wait [4] 120/23<br>136/18 195/7 195/20<br>waiting [3] 156/10<br>171/5 185/5<br>waiver [1] 214/16<br>Wales [4] 117/16<br>117/19 118/19 118/23<br>want [18] 21/18 22/6<br>34/7 42/10 63/5 66/6<br>69/18 84/15 100/20<br>115/8 124/19 145/19<br>152/25 168/10 175/1<br>187/1 199/6 208/19<br>wanted [5] 6/4 80/21<br>102/22 159/18 233/20<br>wanting [3] 130/8  | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12<br>84/4 136/20 139/10<br>141/25 197/9 206/5  | 182/5 182/5 187/23<br>204/17 209/14 221/24<br>222/18 229/13<br>were [328]<br>weren't [10] 53/16<br>55/5 63/17 80/12<br>94/25 95/4 140/12<br>140/18 148/25 176/25<br>what [191] 2/20 4/16<br>5/3 6/7 7/8 7/9 7/17<br>8/24 10/4 10/22 11/15<br>11/19 13/23 15/12<br>15/18 16/8 16/13 17/1<br>18/12 18/18 21/5 22/9<br>24/3 32/9 33/2 34/12<br>34/16 36/11 37/14   | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] 30/7 174/6<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2<br>11/17 14/9 14/21 15/6<br>15/8 16/9 17/9 17/11  |
| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22<br>90/5<br>versus [2] 107/22<br>107/24<br>very [58] 2/22 11/14   | wait [4] 120/23<br>136/18 195/7 195/20<br>waiting [3] 156/10<br>171/5 185/5<br>waiver [1] 214/16<br>Wales [4] 117/16<br>117/19 118/19 118/23<br>want [18] 21/18 22/6<br>34/7 42/10 63/5 66/6<br>69/18 84/15 100/20<br>115/8 124/19 145/19<br>152/25 168/10 175/1<br>187/1 199/6 208/19<br>wanted [5] 6/4 80/21<br>102/22 159/18 233/20<br>wanting [3] 130/8<br>152/8 223/12  | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12<br>84/4 136/20 139/10<br>141/25 197/9 206/5<br>227/12 234/5  | 182/5 182/5 187/23<br>204/17 209/14 221/24<br>222/18 229/13<br>were [328]<br>weren't [10] 53/16<br>55/5 63/17 80/12<br>94/25 95/4 140/12<br>140/18 148/25 176/25<br>what [191] 2/20 4/16<br>5/3 6/7 7/8 7/9 7/17<br>8/24 10/4 10/22 11/15<br>11/19 13/23 15/12<br>15/18 16/8 16/13 17/1<br>18/12 18/18 21/5 22/9<br>24/3 32/9 33/2 34/12<br>34/16 36/11 37/14<br>37/20 38/9 38/16 40/2  | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] 30/7 174/6<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2<br>11/17 14/9 14/21 15/6<br>15/8 16/9 17/9 17/11<br>17/23 19/19 20/13   |
| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22<br>90/5<br>versus [2] 107/22<br>107/24<br>very [58] 2/22 11/14<br>25/7 26/19 28/22<br>30/14 41/1 43/16 62/7<br>62/10 68/11 74/11   | <ul> <li>wait [4] 120/23</li> <li>136/18 195/7 195/20</li> <li>waiting [3] 156/10</li> <li>171/5 185/5</li> <li>waiver [1] 214/16</li> <li>Wales [4] 117/16</li> <li>117/19 118/19 118/23</li> <li>want [18] 21/18 22/6</li> <li>34/7 42/10 63/5 66/6</li> <li>69/18 84/15 100/20</li> <li>115/8 124/19 145/19</li> <li>152/25 168/10 175/1</li> <li>187/1 199/6 208/19</li> <li>wanted [5] 6/4 80/21</li> <li>102/22 159/18 233/20</li> <li>wanting [3] 130/8</li> <li>152/8 223/12</li> <li>warn [3] 49/2 51/3</li> </ul>  | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12<br>84/4 136/20 139/10<br>141/25 197/9 206/5<br>227/12 234/5<br>we've [17] 5/12 18/17   | 182/5 182/5 187/23<br>204/17 209/14 221/24<br>222/18 229/13<br>were [328]<br>weren't [10] 53/16<br>55/5 63/17 80/12<br>94/25 95/4 140/12<br>140/18 148/25 176/25<br>what [191] 2/20 4/16<br>5/3 6/7 7/8 7/9 7/17<br>8/24 10/4 10/22 11/15<br>11/19 13/23 15/12<br>15/18 16/8 16/13 17/1<br>18/12 18/18 21/5 22/9<br>24/3 32/9 33/2 34/12<br>34/16 36/11 37/14<br>37/20 38/9 38/16 40/2<br>41/3 45/1 45/4 45/5   | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] 30/7 174/6<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2<br>11/17 14/9 14/21 15/6<br>15/8 16/9 17/9 17/11<br>17/23 19/19 20/13<br>24/21 25/5 26/21   |
| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22<br>90/5<br>versus [2] 107/22<br>107/24<br>very [58] 2/22 11/14<br>25/7 26/19 28/22<br>30/14 41/1 43/16 62/7<br>62/10 68/11 74/11<br>85/5 90/7 95/25 96/13  | wait [4] 120/23<br>136/18 195/7 195/20<br>waiting [3] 156/10<br>171/5 185/5<br>waiver [1] 214/16<br>Wales [4] 117/16<br>117/19 118/19 118/23<br>want [18] 21/18 22/6<br>34/7 42/10 63/5 66/6<br>69/18 84/15 100/20<br>115/8 124/19 145/19<br>152/25 168/10 175/1<br>187/1 199/6 208/19<br>wanted [5] 6/4 80/21<br>102/22 159/18 233/20<br>wanting [3] 130/8<br>152/8 223/12<br>warn [3] 49/2 51/3<br>182/24  | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12<br>84/4 136/20 139/10<br>141/25 197/9 206/5<br>227/12 234/5<br>we've [17] 5/12 18/17<br>18/19 41/13 64/17  | 182/5 182/5 187/23<br>204/17 209/14 221/24<br>222/18 229/13<br>were [328]<br>weren't [10] 53/16<br>55/5 63/17 80/12<br>94/25 95/4 140/12<br>140/18 148/25 176/25<br>what [191] 2/20 4/16<br>5/3 6/7 7/8 7/9 7/17<br>8/24 10/4 10/22 11/15<br>11/19 13/23 15/12<br>15/18 16/8 16/13 17/1<br>18/12 18/18 21/5 22/9<br>24/3 32/9 33/2 34/12<br>34/16 36/11 37/14<br>37/20 38/9 38/16 40/2<br>41/3 45/1 45/4 45/5<br>47/10 51/11 55/10  | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] 30/7 174/6<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2<br>11/17 14/9 14/21 15/6<br>15/8 16/9 17/9 17/11<br>17/23 19/19 20/13<br>24/21 25/5 26/21<br>27/12 28/13 35/8   |
| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22<br>90/5<br>versus [2] 107/22<br>107/24<br>very [58] 2/22 11/14<br>25/7 26/19 28/22<br>30/14 41/1 43/16 62/7<br>62/10 68/11 74/11<br>85/5 90/7 95/25 96/13<br>96/19 96/25 99/24   | wait [4] 120/23<br>136/18 195/7 195/20<br>waiting [3] 156/10<br>171/5 185/5<br>waiver [1] 214/16<br>Wales [4] 117/16<br>117/19 118/19 118/23<br>want [18] 21/18 22/6<br>34/7 42/10 63/5 66/6<br>69/18 84/15 100/20<br>115/8 124/19 145/19<br>152/25 168/10 175/1<br>187/1 199/6 208/19<br>wanted [5] 6/4 80/21<br>102/22 159/18 233/20<br>wanting [3] 130/8<br>152/8 223/12<br>warn [3] 49/2 51/3<br>182/24<br>warning [1] 185/2   | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12<br>84/4 136/20 139/10<br>141/25 197/9 206/5<br>227/12 234/5<br>we've [17] 5/12 18/17<br>18/19 41/13 64/17<br>79/13 87/10 87/24   | 182/5 182/5 187/23<br>204/17 209/14 221/24<br>222/18 229/13<br>were [328]<br>weren't [10] 53/16<br>55/5 63/17 80/12<br>94/25 95/4 140/12<br>140/18 148/25 176/25<br>what [191] 2/20 4/16<br>5/3 6/7 7/8 7/9 7/17<br>8/24 10/4 10/22 11/15<br>11/19 13/23 15/12<br>15/18 16/8 16/13 17/1<br>18/12 18/18 21/5 22/9<br>24/3 32/9 33/2 34/12<br>34/16 36/11 37/14<br>37/20 38/9 38/16 40/2<br>41/3 45/1 45/4 45/5<br>47/10 51/11 55/10<br>57/18 60/22 64/5  | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] 30/7 174/6<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2<br>11/17 14/9 14/21 15/6<br>15/8 16/9 17/9 17/11<br>17/23 19/19 20/13<br>24/21 25/5 26/21<br>27/12 28/13 35/8<br>35/14 36/10 42/25  |
| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22<br>90/5<br>versus [2] 107/22<br>107/24<br>very [58] 2/22 11/14<br>25/7 26/19 28/22<br>30/14 41/1 43/16 62/7<br>62/10 68/11 74/11<br>85/5 90/7 95/25 96/13<br>96/19 96/25 99/24<br>103/21 106/21 115/4  | wait [4] 120/23<br>136/18 195/7 195/20<br>waiting [3] 156/10<br>171/5 185/5<br>waiver [1] 214/16<br>Wales [4] 117/16<br>117/19 118/19 118/23<br>want [18] 21/18 22/6<br>34/7 42/10 63/5 66/6<br>69/18 84/15 100/20<br>115/8 124/19 145/19<br>152/25 168/10 175/1<br>187/1 199/6 208/19<br>wanted [5] 6/4 80/21<br>102/22 159/18 233/20<br>wanting [3] 130/8<br>152/8 223/12<br>warn [3] 49/2 51/3<br>182/24<br>warning [1] 185/2<br>warranted [1] 167/23   | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12<br>84/4 136/20 139/10<br>141/25 197/9 206/5<br>227/12 234/5<br>we've [17] 5/12 18/17<br>18/19 41/13 64/17<br>79/13 87/10 87/24<br>104/17 110/16 116/22   | 182/5 182/5 187/23<br>204/17 209/14 221/24<br>222/18 229/13<br>were [328]<br>weren't [10] 53/16<br>55/5 63/17 80/12<br>94/25 95/4 140/12<br>140/18 148/25 176/25<br>what [191] 2/20 4/16<br>5/3 6/7 7/8 7/9 7/17<br>8/24 10/4 10/22 11/15<br>11/19 13/23 15/12<br>15/18 16/8 16/13 17/1<br>18/12 18/18 21/5 22/9<br>24/3 32/9 33/2 34/12<br>34/16 36/11 37/14<br>37/20 38/9 38/16 40/2<br>41/3 45/1 45/4 45/5<br>47/10 51/11 55/10<br>57/18 60/22 64/5<br>64/22 65/4 67/16  | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] 30/7 174/6<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2<br>11/17 14/9 14/21 15/6<br>15/8 16/9 17/9 17/11<br>17/23 19/19 20/13<br>24/21 25/5 26/21<br>27/12 28/13 35/8<br>35/14 36/10 42/25<br>43/17 44/12 58/18   |
| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22<br>90/5<br>versus [2] 107/22<br>107/24<br>very [58] 2/22 11/14<br>25/7 26/19 28/22<br>30/14 41/1 43/16 62/7<br>62/10 68/11 74/11<br>85/5 90/7 95/25 96/13<br>96/19 96/25 99/24<br>103/21 106/21 115/4<br>119/9 119/10 119/12   | wait [4] 120/23<br>136/18 195/7 195/20<br>waiting [3] 156/10<br>171/5 185/5<br>waiver [1] 214/16<br>Wales [4] 117/16<br>117/19 118/19 118/23<br>want [18] 21/18 22/6<br>34/7 42/10 63/5 66/6<br>69/18 84/15 100/20<br>115/8 124/19 145/19<br>152/25 168/10 175/1<br>187/1 199/6 208/19<br>wanted [5] 6/4 80/21<br>102/22 159/18 233/20<br>wanting [3] 130/8<br>152/8 223/12<br>warn [3] 49/2 51/3<br>182/24<br>warning [1] 185/2<br>warranted [1] 167/23<br>was [767]  | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12<br>84/4 136/20 139/10<br>141/25 197/9 206/5<br>227/12 234/5<br>we've [17] 5/12 18/17<br>18/19 41/13 64/17<br>79/13 87/10 87/24<br>104/17 110/16 116/22<br>168/9 197/12 208/25  | 182/5 182/5 187/23<br>204/17 209/14 221/24<br>222/18 229/13<br>were [328]<br>weren't [10] 53/16<br>55/5 63/17 80/12<br>94/25 95/4 140/12<br>140/18 148/25 176/25<br>what [191] 2/20 4/16<br>5/3 6/7 7/8 7/9 7/17<br>8/24 10/4 10/22 11/15<br>11/19 13/23 15/12<br>15/18 16/8 16/13 17/1<br>18/12 18/18 21/5 22/9<br>24/3 32/9 33/2 34/12<br>34/16 36/11 37/14<br>37/20 38/9 38/16 40/2<br>41/3 45/1 45/4 45/5<br>47/10 51/11 55/10<br>57/18 60/22 64/5<br>64/22 65/4 67/16<br>68/13 70/1 70/18  | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] 30/7 174/6<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2<br>11/17 14/9 14/21 15/6<br>15/8 16/9 17/9 17/11<br>17/23 19/19 20/13<br>24/21 25/5 26/21<br>27/12 28/13 35/8<br>35/14 36/10 42/25<br>43/17 44/12 58/18<br>58/20 61/14 63/15  |
| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22<br>90/5<br>versus [2] 107/22<br>107/24<br>very [58] 2/22 11/14<br>25/7 26/19 28/22<br>30/14 41/1 43/16 62/7<br>62/10 68/11 74/11<br>85/5 90/7 95/25 96/13<br>96/19 96/25 99/24<br>103/21 106/21 115/4<br>119/9 119/10 119/12<br>119/25 123/4 124/19  | wait [4] 120/23<br>136/18 195/7 195/20<br>waiting [3] 156/10<br>171/5 185/5<br>waiver [1] 214/16<br>Wales [4] 117/16<br>117/19 118/19 118/23<br>want [18] 21/18 22/6<br>34/7 42/10 63/5 66/6<br>69/18 84/15 100/20<br>115/8 124/19 145/19<br>152/25 168/10 175/1<br>187/1 199/6 208/19<br>wanted [5] 6/4 80/21<br>102/22 159/18 233/20<br>wanting [3] 130/8<br>152/8 223/12<br>warn [3] 49/2 51/3<br>182/24<br>warning [1] 185/2<br>warranted [1] 167/23   | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12<br>84/4 136/20 139/10<br>141/25 197/9 206/5<br>227/12 234/5<br>we've [17] 5/12 18/17<br>18/19 41/13 64/17<br>79/13 87/10 87/24<br>104/17 110/16 116/22<br>168/9 197/12 208/25<br>215/11 218/9 231/3  | 182/5 182/5 187/23<br>204/17 209/14 221/24<br>222/18 229/13<br>were [328]<br>weren't [10] 53/16<br>55/5 63/17 80/12<br>94/25 95/4 140/12<br>140/18 148/25 176/25<br>what [191] 2/20 4/16<br>5/3 6/7 7/8 7/9 7/17<br>8/24 10/4 10/22 11/15<br>11/19 13/23 15/12<br>15/18 16/8 16/13 17/1<br>18/12 18/18 21/5 22/9<br>24/3 32/9 33/2 34/12<br>34/16 36/11 37/14<br>37/20 38/9 38/16 40/2<br>41/3 45/1 45/4 45/5<br>47/10 51/11 55/10<br>57/18 60/22 64/5<br>64/22 65/4 67/16  | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] 30/7 174/6<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2<br>11/17 14/9 14/21 15/6<br>15/8 16/9 17/9 17/11<br>17/23 19/19 20/13<br>24/21 25/5 26/21<br>27/12 28/13 35/8<br>35/14 36/10 42/25<br>43/17 44/12 58/18   |
| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22<br>90/5<br>versus [2] 107/22<br>107/24<br>very [58] 2/22 11/14<br>25/7 26/19 28/22<br>30/14 41/1 43/16 62/7<br>62/10 68/11 74/11<br>85/5 90/7 95/25 96/13<br>96/19 96/25 99/24<br>103/21 106/21 115/4<br>119/9 119/10 119/12<br>119/25 123/4 124/19<br>126/12 127/21 127/23  | <pre>wait [4] 120/23<br/>136/18 195/7 195/20<br/>waiting [3] 156/10<br/>171/5 185/5<br/>waiver [1] 214/16<br/>Wales [4] 117/16<br/>117/19 118/19 118/23<br/>want [18] 21/18 22/6<br/>34/7 42/10 63/5 66/6<br/>69/18 84/15 100/20<br/>115/8 124/19 145/19<br/>152/25 168/10 175/1<br/>187/1 199/6 208/19<br/>wanted [5] 6/4 80/21<br/>102/22 159/18 233/20<br/>wanting [3] 130/8<br/>152/8 223/12<br/>warn [3] 49/2 51/3<br/>182/24<br/>warning [1] 185/2<br/>warranted [1] 167/23<br/>was [767]<br/>was was [1]<br/>230/23<br/>was/is [2] 22/10</pre>  | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12<br>84/4 136/20 139/10<br>141/25 197/9 206/5<br>227/12 234/5<br>we've [17] 5/12 18/17<br>18/19 41/13 64/17<br>79/13 87/10 87/24<br>104/17 110/16 116/22<br>168/9 197/12 208/25  | 182/5 182/5 187/23<br>204/17 209/14 221/24<br>222/18 229/13<br>were [328]<br>weren't [10] 53/16<br>55/5 63/17 80/12<br>94/25 95/4 140/12<br>140/18 148/25 176/25<br>what [191] 2/20 4/16<br>5/3 6/7 7/8 7/9 7/17<br>8/24 10/4 10/22 11/15<br>11/19 13/23 15/12<br>15/18 16/8 16/13 17/1<br>18/12 18/18 21/5 22/9<br>24/3 32/9 33/2 34/12<br>34/16 36/11 37/14<br>37/20 38/9 38/16 40/2<br>41/3 45/1 45/4 45/5<br>47/10 51/11 55/10<br>57/18 60/22 64/5<br>64/22 65/4 67/16<br>68/13 70/1 70/18<br>81/18 82/20 83/15   | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] $30/7 174/6$<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2<br>11/17 14/9 14/21 15/6<br>15/8 16/9 17/9 17/11<br>17/23 19/19 20/13<br>24/21 25/5 26/21<br>27/12 28/13 35/8<br>35/14 36/10 42/25<br>43/17 44/12 58/18<br>58/20 61/14 63/15<br>67/18 70/6 71/25  |
| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22<br>90/5<br>versus [2] 107/22<br>107/24<br>very [58] 2/22 11/14<br>25/7 26/19 28/22<br>30/14 41/1 43/16 62/7<br>62/10 68/11 74/11<br>85/5 90/7 95/25 96/13<br>96/19 96/25 99/24<br>103/21 106/21 115/4<br>119/9 119/10 119/12<br>119/25 123/4 124/19<br>126/12 127/21 127/23<br>130/23 133/7 134/9  | wait [4] 120/23<br>136/18 195/7 195/20<br>waiting [3] 156/10<br>171/5 185/5<br>waiver [1] 214/16<br>Wales [4] 117/16<br>117/19 118/19 118/23<br>want [18] 21/18 22/6<br>34/7 42/10 63/5 66/6<br>69/18 84/15 100/20<br>115/8 124/19 145/19<br>152/25 168/10 175/1<br>187/1 199/6 208/19<br>wanted [5] 6/4 80/21<br>102/22 159/18 233/20<br>wanting [3] 130/8<br>152/8 223/12<br>warn [3] 49/2 51/3<br>182/24<br>warning [1] 185/2<br>warranted [1] 167/23<br>was [767]<br>was was [1]<br>230/23<br>was/is [2] 22/10<br>217/15   | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12<br>84/4 136/20 139/10<br>141/25 197/9 206/5<br>227/12 234/5<br>we've [17] 5/12 18/17<br>18/19 41/13 64/17<br>79/13 87/10 87/24<br>104/17 110/16 116/22<br>168/9 197/12 208/25<br>215/11 218/9 231/3<br>weaknesses [2]<br>17/17 18/5<br>wealth [1] 124/5  | 182/5 182/5 187/23<br>204/17 209/14 221/24<br>222/18 229/13<br>were [328]<br>weren't [10] 53/16<br>55/5 63/17 80/12<br>94/25 95/4 140/12<br>140/18 148/25 176/25<br>what [191] 2/20 4/16<br>5/3 6/7 7/8 7/9 7/17<br>8/24 10/4 10/22 11/15<br>11/19 13/23 15/12<br>15/18 16/8 16/13 17/1<br>18/12 18/18 21/5 22/9<br>24/3 32/9 33/2 34/12<br>34/16 36/11 37/14<br>37/20 38/9 38/16 40/2<br>41/3 45/1 45/4 45/5<br>47/10 51/11 55/10<br>57/18 60/22 64/5<br>64/22 65/4 67/16<br>68/13 70/1 70/18<br>81/18 82/20 83/15<br>83/19 85/13 87/18  | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] $30/7 174/6$<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2<br>11/17 14/9 14/21 15/6<br>15/8 16/9 17/9 17/11<br>17/23 19/19 20/13<br>24/21 25/5 26/21<br>27/12 28/13 35/8<br>35/14 36/10 42/25<br>43/17 44/12 58/18<br>58/20 61/14 63/15<br>67/18 70/6 71/25<br>72/13 75/14 86/22   |
| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22<br>90/5<br>versus [2] 107/22<br>107/24<br>very [58] 2/22 11/14<br>25/7 26/19 28/22<br>30/14 41/1 43/16 62/7<br>62/10 68/11 74/11<br>85/5 90/7 95/25 96/13<br>96/19 96/25 99/24<br>103/21 106/21 115/4<br>119/9 119/10 119/12<br>119/25 123/4 124/19<br>126/12 127/21 127/23<br>130/23 133/7 134/9<br>135/6 142/13 142/13   | wait [4] 120/23<br>136/18 195/7 195/20<br>waiting [3] 156/10<br>171/5 185/5<br>waiver [1] 214/16<br>Wales [4] 117/16<br>117/19 118/19 118/23<br>want [18] 21/18 22/6<br>34/7 42/10 63/5 66/6<br>69/18 84/15 100/20<br>115/8 124/19 145/19<br>152/25 168/10 175/1<br>187/1 199/6 208/19<br>wanted [5] 6/4 80/21<br>102/22 159/18 233/20<br>wanting [3] 130/8<br>152/8 223/12<br>warn [3] 49/2 51/3<br>182/24<br>warning [1] 185/2<br>warranted [1] 167/23<br>was [767]<br>was was [1]<br>230/23<br>was/is [2] 22/10<br>217/15<br>wasn't [51] 6/13 6/22  | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12<br>84/4 136/20 139/10<br>141/25 197/9 206/5<br>227/12 234/5<br>we've [17] 5/12 18/17<br>18/19 41/13 64/17<br>79/13 87/10 87/24<br>104/17 110/16 116/22<br>168/9 197/12 208/25<br>215/11 218/9 231/3<br>weaknesses [2]<br>17/17 18/5<br>wealth [1] 124/5<br>Wednesday [3] 17/9  | $\begin{array}{c} 182/5 \ 182/5 \ 187/23\\ 204/17 \ 209/14 \ 221/24\\ 222/18 \ 229/13\\ \hlinelength{\mbox{were}} [328]\\ \hlinelength{\mbox{were}} [10] \ 53/16\\ 55/5 \ 63/17 \ 80/12\\ 94/25 \ 95/4 \ 140/12\\ 140/18 \ 148/25 \ 176/25\\ \hlinelength{\mbox{what}} [191] \ 2/20 \ 4/16\\ 5/3 \ 6/7 \ 7/8 \ 7/9 \ 7/17\\ 8/24 \ 10/4 \ 10/22 \ 11/15\\ 11/19 \ 13/23 \ 15/12\\ 15/18 \ 16/8 \ 16/13 \ 17/1\\ 18/12 \ 18/18 \ 21/5 \ 22/9\\ 24/3 \ 32/9 \ 33/2 \ 34/12\\ 34/16 \ 36/11 \ 37/14\\ 37/20 \ 38/9 \ 38/16 \ 40/2\\ 41/3 \ 45/1 \ 45/4 \ 45/5\\ 47/10 \ 51/11 \ 55/10\\ 57/18 \ 60/22 \ 64/5\\ 64/22 \ 65/4 \ 67/16\\ 68/13 \ 70/1 \ 70/18\\ 81/18 \ 82/20 \ 83/15\\ 83/19 \ 85/13 \ 87/18\\ 90/25 \ 93/9 \ 94/5 \ 97/6\\ 99/25 \ 100/9 \ 101/11\\ 101/24 \ 103/7 \ 105/10\\ \hline\end{array}$  | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] $30/7 174/6$<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2<br>11/17 14/9 14/21 15/6<br>15/8 16/9 17/9 17/11<br>17/23 19/19 20/13<br>24/21 25/5 26/21<br>27/12 28/13 35/8<br>35/14 36/10 42/25<br>43/17 44/12 58/18<br>58/20 61/14 63/15<br>67/18 70/6 71/25<br>72/13 75/14 86/22<br>86/25 92/14 94/6<br>101/1 103/3 112/24<br>116/13 116/14 122/16   |
| 93/5 93/23<br>van den Bogerd [1]<br>93/23<br>varied [1] 124/6<br>various [14] 12/22<br>13/8 14/19 22/2 24/24<br>26/13 36/20 92/6<br>92/10 96/22 111/8<br>122/19 128/21 160/10<br>vast [1] 1/13<br>verbally [1] 142/9<br>version [2] 26/22<br>90/5<br>versus [2] 107/22<br>107/24<br>very [58] 2/22 11/14<br>25/7 26/19 28/22<br>30/14 41/1 43/16 62/7<br>62/10 68/11 74/11<br>85/5 90/7 95/25 96/13<br>96/19 96/25 99/24<br>103/21 106/21 115/4<br>119/9 5123/4 124/19<br>126/12 127/21 127/23<br>130/23 133/7 134/9<br>135/6 142/13 142/13<br>146/21 147/3 148/8  | wait [4] 120/23<br>136/18 195/7 195/20<br>waiting [3] 156/10<br>171/5 185/5<br>waiver [1] 214/16<br>Wales [4] 117/16<br>117/19 118/19 118/23<br>want [18] 21/18 22/6<br>34/7 42/10 63/5 66/6<br>69/18 84/15 100/20<br>115/8 124/19 145/19<br>152/25 168/10 175/1<br>187/1 199/6 208/19<br>wanted [5] 6/4 80/21<br>102/22 159/18 233/20<br>wanting [3] 130/8<br>152/8 223/12<br>warn [3] 49/2 51/3<br>182/24<br>warning [1] 185/2<br>warranted [1] 167/23<br>was [767]<br>was was [1]<br>230/23<br>was/is [2] 22/10<br>217/15<br>wasn't [51] 6/13 6/22<br>15/17 19/14 21/6                      | we [355]<br>we'd [17] 17/6 87/7<br>103/8 115/2 128/9<br>128/24 134/19 134/24<br>138/24 144/22 150/22<br>161/13 166/17 166/21<br>166/22 195/12 224/2<br>we'll [11] 2/21 16/3<br>104/1 125/24 128/2<br>129/1 136/18 141/6<br>176/1 177/18 203/9<br>we're [17] 37/15 41/2<br>41/15 55/14 58/7<br>61/14 66/4 68/4 78/12<br>84/4 136/20 139/10<br>141/25 197/9 206/5<br>227/12 234/5<br>we've [17] 5/12 18/17<br>18/19 41/13 64/17<br>79/13 87/10 87/24<br>104/17 110/16 116/22<br>168/9 197/12 208/25<br>215/11 218/9 231/3<br>weaknesses [2]<br>17/17 18/5<br>wealth [1] 124/5<br>Wednesday [3] 17/9<br>227/21 227/23                       | 182/5 182/5 187/23<br>204/17 209/14 221/24<br>222/18 229/13<br>were [328]<br>weren't [10] 53/16<br>55/5 63/17 80/12<br>94/25 95/4 140/12<br>140/18 148/25 176/25<br>what [191] 2/20 4/16<br>5/3 6/7 7/8 7/9 7/17<br>8/24 10/4 10/22 11/15<br>11/19 13/23 15/12<br>15/18 16/8 16/13 17/1<br>18/12 18/18 21/5 22/9<br>24/3 32/9 33/2 34/12<br>34/16 36/11 37/14<br>37/20 38/9 38/16 40/2<br>41/3 45/1 45/4 45/5<br>47/10 51/11 55/10<br>57/18 60/22 64/5<br>64/22 65/4 67/16<br>68/13 70/1 70/18<br>81/18 82/20 83/15<br>83/19 85/13 87/18<br>90/25 93/9 94/5 97/6<br>99/25 100/9 101/11<br>101/24 103/7 105/10<br>106/14 106/22 107/5  | 219/22 223/17 224/1<br>226/11 226/19 227/19<br>229/6 230/5 230/12<br>230/13 231/3 231/7<br>231/13 232/16 233/7<br>what's [3] $30/7 174/6$<br>175/1<br>whatever [8] 128/14<br>143/6 147/22 158/1<br>166/23 204/10 204/12<br>213/3<br>whatsoever [1]<br>147/16<br>when [100] 11/2<br>11/17 14/9 14/21 15/6<br>15/8 16/9 17/9 17/11<br>17/23 19/19 20/13<br>24/21 25/5 26/21<br>27/12 28/13 35/8<br>35/14 36/10 42/25<br>43/17 44/12 58/18<br>58/20 61/14 63/15<br>67/18 70/6 71/25<br>72/13 75/14 86/22<br>86/25 92/14 94/6<br>101/1 103/3 112/24<br>116/13 116/14 122/16<br>122/25 124/8 124/14                        |
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| 1024 180/22 181/19       111 121/8       youre [23] 52 1321         9921 1861 4/15 4/2       19/23 29/8 327/3211       15/59         231/1       19/23 29/8 327/3211       youre [23] 52 1321       19/59         995 1161 10/17 15/10       19/52 29/8 327/3211       youre [23] 52/321       19/59         29/13 006 3221       100/51 11/14 116/61       20/12 29/221       20/12 20/221         107/1620 16/24 166       71/2 29/08 20/18 5/17       2d/ratko [1] 29/22       20/23 20/14         29/13 006 3221       100/51 11/14 116/61 Earto [4] 20/29 20/21/4       20/23 20/14       20/23 20/17         10/21 29/22 22/23       16/25 19/17 20/10       20/23 20/17       20/23 20/17         10/21 10/10 10       13/3 4/8 4/41 47/13       30/12 4/13 6/0 20/73       30/24 1/16/24         10/21 10/10 10       13/92 18/14 20/10       30/12 4/13 6/0 20/73       30/24 1/16/14         10/21 10/21 10/21 10/21 10/24       10/11 10/23 13/24       11/16/14 10/24       11/16 1/2 3/14         110/21 10/21 10/21 10/21 10/24       10/21 10/24       10/24 1/24       11/24       11/14 10/24       11/14 10/24       11/14 10/24       11/14 10/24       11/14 10/24       11/14 10/24       11/14 10/24       11/14 10/24       11/14 10/24       11/14 10/24       11/14 10/24       11/14 10/24       11/14 10/25       11/1   |                       |                       |                       |  |
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| 19/12       19/12       29/12       29/17       yourselves [1]       42/3         5/16       6/16       10/17       15/16       6/17       15/16       15/16       15/16       15/16       15/16       15/16       15/16       15/16       15/16       15/16       15/16       15/17       15/16       15/17       15/16       15/17  | 198/24 208/14 230/21  |                       |                       |  |
| Heat         Heat         Heat         Heat         Heat         Heat           16778         1677         16778         16777         16778         16777         16778         16777         16778         16777         16777         16777         16777         16777         16777  | 231/1                 |                       |                       |  |
| 16/7 16/20 16/24 18/5       0/11 27/82 80/1 85/17       Zizvako [1] 20/22         29/13 30/3 32/23       100/15 111/14 116/16 zero [4] 20/29 20/21/4       20/32 30/3 22/3         17/14 26/4 27/23 28/16       20/32 32/3 20/97         63/12 64/15 66/1       40/25 71/9 20/15 22/32       20/32 32/3 20/97         63/12 64/15 66/1       40/25 71/9 20/15 22/32       20/32 32/3 20/97         63/12 64/15 66/1       40/25 71/9 20/15 22/36       20/32 30/97         63/12 64/15 66/1       40/25 71/9 20/16 22/36       20/37         63/12 64/15 66/14       10/17 10/22 10/10       24/1 26/4 27/23 28/16         94/25 100/18 105/8       84/11 85/3 94/20 97/3       84/11 85/3 94/20 97/3         100/16 106/11 106/11       10/17 10/9/20       11/9/17 10/9/20         100/17 109/20 11/9/21 10/24       10/9/2 18/14 23/14       11/9/2         100/16 106/11 106/11       10/17 10/9/20 18/12/37/3 3/24 4/7       4/11 6/12 8/6 8/6 8/7         110/17 11/16 11/12       9/12 9/13 1/3/23 3/24 4/7       4/11 6/12 8/6 8/6 8/7         110/17 11/16 11/12/15       17/16 18/11 19/17       12/15 22/11 12/16         12/21 15 24/11 125/18       17/12 18/11 19/17       12/15 22/14/11 125/18         13/9 14/11 11/16 11/16 11/16 22/6       23/17 24/4 25/2 26/4       23/17 24/4 25/2 26/4         13/9/14 11/16 11/16 22/6       23/17 24/   | yes [164] 4/15 4/24   | 19/23 29/8 32/1 32/11 | yourselves [1] 42/3   |  |
| 16/7 16/20 16/24 18/5       0/11 27/82 80/1 85/17       Zizvako [1] 20/22         29/13 30/3 32/23       100/15 111/14 116/16 zero [4] 20/29 20/21/4       20/32 30/3 22/3         17/14 26/4 27/23 28/16       20/32 32/3 20/97         63/12 64/15 66/1       40/25 71/9 20/15 22/32       20/32 32/3 20/97         63/12 64/15 66/1       40/25 71/9 20/15 22/32       20/32 32/3 20/97         63/12 64/15 66/1       40/25 71/9 20/15 22/36       20/32 30/97         63/12 64/15 66/1       40/25 71/9 20/16 22/36       20/37         63/12 64/15 66/14       10/17 10/22 10/10       24/1 26/4 27/23 28/16         94/25 100/18 105/8       84/11 85/3 94/20 97/3       84/11 85/3 94/20 97/3         100/16 106/11 106/11       10/17 10/9/20       11/9/17 10/9/20         100/17 109/20 11/9/21 10/24       10/9/2 18/14 23/14       11/9/2         100/16 106/11 106/11       10/17 10/9/20 18/12/37/3 3/24 4/7       4/11 6/12 8/6 8/6 8/7         110/17 11/16 11/12       9/12 9/13 1/3/23 3/24 4/7       4/11 6/12 8/6 8/6 8/7         110/17 11/16 11/12/15       17/16 18/11 19/17       12/15 22/11 12/16         12/21 15 24/11 125/18       17/12 18/11 19/17       12/15 22/14/11 125/18         13/9 14/11 11/16 11/16 11/16 22/6       23/17 24/4 25/2 26/4       23/17 24/4 25/2 26/4         13/9/14 11/16 11/16 22/6       23/17 24/   | 5/16 6/16 10/17 15/10 | 44/3 33/2 03/13 07/10 | Z                     |  |
| 100/15       100/15       111/14       116/16       202/9       202/14         29/13       303       32/23       172/19       27/5       203/23       209/17         41/14       43/6       44/24       you've [23]       32/5       203/23       209/17         63/12       64/15       66/14       32/13       34/8       44/14       47/13         77/22       79/9       82/22       56/13       32/13       34/8       44/14       47/13         65/16       106/17       108/17       108/20       109/12       109/12       109/12         94/25       100/16       119/13       130/20       131/24       109/16       109/16       109/16       109/17       109/17       104/21       108/17       109/17       109/17       104/17       109/17       109/17       104/17       109/17       101/17       109/17       101/17  | 16/7 16/20 16/24 18/5 |                       |                       |  |
| 26/13 00/3 02/23       172/19 207/5 223/5       203/23 209/17         53/19 62/16 62/23       16/25 19/17 20/10       16/25 19/17 20/10         63/12 64/15 66/14       24/1 26/4 27/23 28/16       16/25 19/17 20/10         66/23 71/2 71/3 73/14       24/1 26/4 27/23 28/16       16/25 19/17 20/10         85/8 65/11 87/25       84/11 85/3 94/20 97/3       84/11 85/3 94/20 97/3         94/25 100/16 105/8       100/17 104/21 108/4       108/12 109/17 109/20         105/16 106/1 106/1       19/13 13/20 13/12/4       119/13 13/20 13/12/4         111/16 112/14 115/5       109/12 109/17 109/20       13/24 3/14         111/16 112/14 115/5       your [148] 12/24 3/1       13/24 3/14         120/25 121/4 11 12/18       13/16 14/4 16/5 16/25       12/14 3/14         120/25 121/4 11 12/18       13/16 14/4 16/5 16/25       12/14 3/14         120/25 121/4 12/20       80/24 9/17 13/1       12/15 3/27 15/21         120/25 121/6 13/16       20/10 2/19 21/16 22/6       12/14         139/9 14/11 14/11 14/16       3/12 24/15/20       14/17 14/4/17 14/14/14/16         139/9 14/11 14/11       3/12 34/14 3/3/23       14/14 3/3/23         150/13 150/20 151/16       27/15 28/16 3/3/6       17/15 28/16 3/3/6         157/13 16/3/17/14 14/14/14/14/16       16/22 66/9       17/12       17/17 14  |                       | 100/15 111/14 116/16  | zero [4] 202/9 202/14 |  |
| 41/14 3/6 44/24       you've (23) 3/25         63/12 64/15 66/14       16/25 19/17 20/10         63/23 71/2 71/3 73/14       12/61 27/23 28/16         66/23 71/2 71/3 73/14       12/13 23/84 44/1 47/13         85/9 85/11 87/25       10/11 85/5 94/20 97/3         94/25 100/18 105/6       100/17 109/20         105/16 106/1 106/11       19/13 13/02 131/24         108/8 109/9 110/10       13/92 131/24 31/4         115/22 115/25 116/12       your [148] 1/24 3/1         117/1 117/18 118/2       3/9 3/12 3/23 3/24 4/7         117/1 117/18 118/2       3/9 3/12 3/23 3/24 4/7         119/7 119/24 119/24       4/11 6/12 8/8 66 8/7         12/215 124/11 125/18       7/2 8/11 9/17         12/215 124/11 125/18       7/2 18/11 9/17         12/215 124/11 125/18       7/2 18/11 9/17         12/215 124/11 125/18       7/2 18/11 9/17         12/215 13/21 13/23       20/10 21/9 21/16 22/6         13/90 14/11 144/17 148/20       3/9 3/2 3/22 3/24         13/91 14/11 144/17       13/22 18/17         15/91 15/92 15/91 1       5/25 8/16 3/8 5/10         15/91 15/92 15/91 1       5/23 56/25 63/6         15/91 5/92 15/91 1       5/23 56/25 63/6         15/91 5/92 15/91 1       6/13 65/25 63/6         15/92 15/91 1 <td></td> <td></td> <td>203/23 209/17</td> <td></td>  |                       |                       | 203/23 209/17         |  |
| 33.1       1263       0.23       0.24       0.25       0.27         166/23       71/2       71/3       73/14       27/13       73/14       27/13       73/14       27/13       73/14       27/13       73/14       27/13       73/14       27/13       73/14       27/13       73/14       27/13       73/14       27/13       73/14       27/13       73/14       27/13       73/14       27/13       73/14       27/13       73/14       27/14       27/17       10/14/11       11/14   |                       |                       | 200/20 200/11         |  |
| 0.3/12 04/15 06/14       24/1 26/4 27/23 28/16         06/23 71/2 71/3 731/4       32/13 3/8 4/4/1 47/13         7/7/22 79/8 62/22 85/8       32/13 3/8 4/4/1 47/13         94/25 100/18 105/8       102/17 104/21 108/4         105/16 106/1 106/11       119/13 130/20 131/24         106/16 106/1 101/1       119/13 130/20 131/24         111/16 112/14 115/5       90/12 180/17 109/20         111/16 112/14 115/5       90/12 180/17 109/20         111/16 112/14 115/5       90/12 180/17 109/20         111/16 112/14 115/1       90/12 180/17 109/20         111/16 112/14 115/1       90/12 180/17 109/20         111/17/11 11/17       119/21 150/21 15/12         111/16 112/14 11/17       110/12 10/16 20/6         111/16 112/14 11/17       110/12 10/16 20/6         111/16 112/14 11/14       11/16 11/2 11/16 20/6         111/16 11/2 11/16 11/2       11/12 3/14 13/2         111/16 11/14 11/16 11/16       11/16 3/22         111/16 11/14 11/16       11/12 3/14 13/2         111/16 11/17 113/12       11/13 2/12 18/1/1         111/17 111/14       11/16 11/12 2/16         111/16 11/17 113/12       11/13 3/12 3/14         111/16 11/17 113/12       11/13 3/12 13/14         111/17 111/17 111/17 11/17       11/17 11/17 11/17 <t< td=""><td></td><td></td><td></td><td></td></t<>  |                       |                       |                       |  |
| b0/23 /1/2 /1/3 /314       32/13 34/8 44/1 47/13         7/22 79/8 222 85/8       84/11 85/3 94/20 97/3         94/25 100/14 106/8       106/17 104/12 108/4         105/16 106/1 106/11       106/12 109/17 109/20         108/8 109/9 110/10       139/2 181/4 231/4         111/16 112/14 115/5       15/22 115/25 116/12         111/16 112/14 115/2       yon [148] 124 3/1         120/25 121/4 12/20       39/21 8/1/2 3/1         120/25 121/4 121/20       13/16 14/4 16/5 16/25         121/5 122/31 25/23 130/28       20/10 21/9 21/16 22/6         23/17 24/4 25/2 26/4       23/17 24/4 25/2 26/4         139/9 14/1/1 14/16       34/12 34/14 35/20         34/14 34/14 35/20       34/24 4/14 34/23         31/17 24/4 25/2 26/4       23/13 72/2 3/16/26/4         139/9 14/1/1 14/16       34/12 34/14 35/20         34/24 4/13 45/20       34/24 4/14 85/122         50/13 15/02 15/16       53/23 56/25 63/6         15/2/1 15/2/1 58/13       64/20 69/21 70/22         15/13 15/2 15/3/13       77/20 79/13 80/16         17/20 79/13 80/16       77/20 79/13 80/16         17/21 79/13 19/18       16/14 116/15 117/15         15/22 16/16 127/15       17/20 89/14 297/4         15/14 12/21 101/14       116/14 116/15 117/15  |                       |                       |                       |  |
| 17/12 19/18 82/22 8396       84/11 85/3 94/20 97/3         85/9 85/11 87/25       102/17 104/21 108/4         105/16 106/11       108/12 109/17 109/20         111/16 112/14 115/5       109/12 109/17 109/20         111/16 112/14 115/5       109/12 109/17 109/20         111/16 112/14 115/5       109/12 109/17 109/20         111/16 112/14 115/5       109/12 109/17 109/20         111/16 112/14 115/1       109/12 109/17 109/20         111/16 112/14 115/1       109/12 109/17 109/20         111/17 1111       111/16 112/16 86 68 07         112/15 12/11 112/18       11/12 18/11 19/17         112/15 12/11 112/18       11/12 18/11 19/17         112/15 12/11 112/18       20/17 24/4 25/2 26/4         113/17 148/17 148/20       20/12 2/16 22/16         20/17 24/4 25/12 26/14       20/24 44/8 51/22         111/17 148/17 148/20       40/24 44/8 51/22         115/12 15/11 111/11 14/16 18/7       109/24 11/3 23/3 25/20         117/16 112/24 15/24 15/37       71/13 72/27 75/25         117/16 112/24 113/24       17/26 7/13 80/16         117/16 112/24 113/24       17/17 49/12 20/18         116/17 1111/11 110/12 109/14       11/11 111/11 111/16 116/7         116/17 111/16 116/7       11/14 114/16 116/7         116/17 111/16 116/7       11  |                       |                       |                       |  |
| 56/9 56/11 67/25       102/17 104/21 108/4         105/16 106/1 106/61       106/11 106/11         105/16 106/1 106/61       108/11 19/13 130/20 131/24         111/16 112/14 115/2       119/2 131/23 2/3 3/24 4/7         111/11 17/11 17/18 118/2       99 3/12 3/23 3/24 4/7         111/11 17/11 17/18 118/2       4/11 6/12 8/6 8/6 8/7         120/25 121/41 125/23 125/23 129/8       20/10 21/9 21/16 22/6         120/15 124/11 125/18       30/16 4/4 16/5 16/25         125/23 125/23 129/8       20/10 21/9 21/16 22/6         139/9 141/11 141/16       31/12 34/14 35/20         139/14 141/144 14/8 516/25       23/17 24/4 25/2 26/4         23/17 24/4 25/2 06/4       23/17 24/4 25/2 06/4         139/9 141/11 141/16       34/12 34/14 35/20         147/17 148/17 148/17       34/12 34/14 35/20         147/17 148/17 148/27       39/24 4/3 34/3/3         159/24 158/24 158/9       68/20 69/21 70/22         167/12 168/3 10/013       107/17 109/12         170/15 17/19 172/14       17/12 79/13 80/16         170/15 17/19 172/14       17/12 109/14         180/15 80/01 180/15       105/3 105/5 107/4         190/15 190/15 180/16       108/11 109/12 109/14         190/15 180/16 139/16       12/25 12/21 42/12         191/16 120/12 120/21 <t< td=""><td></td><td></td><td></td><td></td></t<>   |                       |                       |                       |  |
| 94/25 100/16 105/1       108/12 109/17 109/20         105/16 106/1 106/1       119/13 130/20 131/24         1170       139/2 181/4 231/4         1171/1 1171/1 118/2       139/2 181/4 231/4         1175/2 115/25 116/12       Your [148] 1/24 3/1         1177/1 1177/1 118/2       39/312 3/23 3/24 4/7         1171/1 117/18 118/2       Your [148] 1/24 3/1         1197/1 19/24 119/24       39/312 3/23 3/24 4/7         1197/1 19/27 119/24 119/24       13/16 14/4 16/5 16/25         125/23 125/23 129/8       17/2 18/11 19/17         125/23 125/23 129/8       17/2 18/11 19/17         126/6 136/25 137/6       3/12 34/41 45/20         139/9 141/11 14/16       27/5 28/16 3/48 34/11         1316/1 34/25 135/11       39/24 4/13 45/20         157/1 315/25 155/11       3/12 34/14 35/20         157/1 517/57       53/23 56/25 63/6         152/1 55/25 155/11       53/23 56/25 63/6         157/21 58/31       64/13 65/22 66/9         157/21 58/31       64/13 65/22 66/9         158/24 158/24 163/9       72/13 72/22 75/25         176/17 18/175       71/3 59/21 96/14         170/15 171/19 172/14       71/20 79/18 80/16         170/15 171/19 172/14       71/20 79/18 80/16         172/16 172/21 173/21       1   |                       |                       |                       |  |
| 105/105/1106/11       119/13 130/20 131/24         105/8 109/106/11       119/13 130/20 131/24         111/16 112/14 115/2       115/22 115/25 116/12         111/16 112/14 115/2       115/22 115/25 116/12         111/16 112/14 112/2       3/9 3/13 3/23 3/24 4/7         111/17 1117/18 118/2       3/9 3/13 3/23 3/24 4/7         1120/25 121/4 121/20       8/9 8/24 9/17 13/1         120/25 121/14 121/20       8/9 8/24 9/17 13/1         125/23 125/23 129/8       20/10 21/9 21/16 22/6         129/15 130/23 130/23       20/10 21/9 21/16 22/6         139/9 141/11 41/16       13/12 3/43 3/23         139/9 141/11 41/16       3/12 3/41 3/3 3/23         147/17 148/17 148/20       3/24 41/3 3/23         150/13 150/20 151/6       3/23 56/25 63/6         152/1 153/25 155/11       53/23 56/25 63/6         157/9 157/22 158/13       68/20 69/21 70/22         167/12 168/3 17/013       72/13 72/22 75/25         177/14 174/5 174/25       68/26 69/21 70/22         167/12 168/3 17/013       11/25 21/33/8 8/3         172/16 172/24 173/22       11/26 21/2 20/42         172/16 172/24 173/25       77/6         176/17 18/14       105/3 105/5 107/4         18/12 28/21 14/24       105/13 105/5 107/4         19/12 18/14 </td <td></td> <td></td> <td></td> <td></td>   |                       |                       |                       |  |
| 111/16 112/14 115/5       139/2 181/4 231/4         115/22 115/25 116/12       2001 [148] 12/24 3/1         119/7 117/18 118/2       3/9 3/12 3/23 3/24 4/7         119/7 119/24 119/24       4/16 (12 8/6 8/6 8/7         120/25 121/14 121/20       8/9 8/24 9/17 13/1         120/25 121/14 121/20       13/16 14/4 16/5 16/25         129/15 130/23 130/23       20/10 21/9 21/16 22/6         129/15 130/23 130/23       20/10 21/9 21/16 22/6         139/9 141/11 141/16       13/12 44/4 25/2 26/4         139/9 141/11 141/16       3/12 3/17 24/4 25/2 26/4         150/13 150/20 151/6       53/23 56/25 63/6         163/22 155/11       64/20 69/21 70/22         150/13 150/20 151/6       53/23 56/25 63/6         163/24 158/24 163/9       77/13 72/27 75/25         170/15 171/19 172/14       77/13 72/27 75/25         170/15 171/19 172/14       77/13 72/27 75/25         176/9 178/7       77/13 72/27 75/25         176/9 178/7       19/15 29/1 4/2 93/3 85/3         19/1 19/17 111/12       105/3 105/5 107/4         10/15 180/17 181/15       105/3 105/5 107/4         19/1 19/2/10 132/15       106/14 101/2 109/14         111/12 11/16 122/2       116/14 116/15 117/15         19/1 19/17 120/19 120/15 210/16       12/14 11/12 11/16 122/2  |                       | 119/13 130/20 131/24  |                       |  |
| 115/22 115/25 116/12       J09 J12 3/32 3/24 4/7         117/1 117/18 118/2       3/9 J12 3/32 3/24 4/7         119/7 119/24 119/24       4/11 6/12 8/6 8/6 8/7         120/25 121/4 121/20       8/9 8/24 9/17 13/1         126/23 125/23 129/8       3/16 14/4 16/5 16/25         126/23 125/23 129/8       13/16 14/4 16/5 16/25         126/23 125/23 129/8       23/17 24/4 25/2 26/4         129/15 130/23 130/23       23/17 24/4 25/2 26/4         139/9 141/11 141/16       27/5 28/16 3/4 83/1/1         139/9 141/11 141/16       39/24 41/3 43/23         14/1/18 14/28 145/1       39/24 41/3 43/23         150/13 150/20 151/16       53/23 56/25 63/6         157/1 157/22 158/13       56/22 66/9         157/1 157/22 158/13       56/22 66/9         157/1 157/21 158/14       36/23 06/25 63/6         157/1 157/21 158/14       39/24 21/28/33 85/3         17/20 172/24 173/22       78/28 3/85/3         17/21 74/1 74/8/17       17/20 13/22         17/21 18/71 120/17       17/22 15/21         17/21 18/71 120/17       17/21 13/17         17/22 18/17 148/10       10/11 109/12 109/14         17/21 17/21 18/71 118/25       17/21 18/71         18/22 18/21 18/64       10/11 10/12 109/14         19/21 19/14 19/14  |                       | 139/2 181/4 231/4     |                       |  |
| 111/1       111/1 <td< th=""><th></th><th>your [148] 1/24 3/1</th><th></th><th></th></td<>  |                       | your [148] 1/24 3/1   |                       |  |
| 119/7       119/24       119/24       110/12/36/8/6/8/7         120/25       121/4       121/15       13/16       13/16       13/16         122/15       124/11       125/18       17/2       18/11       19/17         128/15       130/23       130/23       20/10       21/19       21/16       22/16         136/6       136/25       137/2       23/17       24/14       25/2       23/17       24/14       25/2         139/9       14/11       11/16       14/16       34/12       34/11       34/12       34/11       34/12       34/11       34/12       34/11       34/12       34/11       34/12       34/11       34/12       34/11       34/12       34/11       34/12       34/11       34/12       34/11       34/12       34/11       34/12       34/11       34/14       35/20       35/21   |                       |                       |                       |  |
| 120/25       12/14       12/14       12/14       16/14/16/5       16/25         122/15       12/15       12/14       12/16       12/16       12/16       12/16         125/23       125/23       12/16       12/16       12/16       12/16       12/16       12/16         126/15       130/23       130/23       20/10       21/12       12/16       12/16       12/16         139/14       11/11       14/16       14/16       12/16       22/16       22/17       22/14       22/16       22/17       22/16       22/17       22/16       22/17       22/16       22/17       22/17       22/17       22/17       22/17       22/17       22/17       22/17       22/17       22/17       22/17       22/17       22/17       22/17       22/17       22/17       22/17       22/17       22/25       27/17       27/13       27/13       27/13       27/13       27/13       27/13       27/14       27/15       27/15       27/15       27/15       27/15       27/15       27/15       27/15       27/15       27/15       27/15       27/15       27/15       27/14       27/15       27/15       27/15       27/16       27/17       27/15       27/15  |                       | 4/11 6/12 8/6 8/6 8/7 |                       |  |
| 122/15       124/11       125/18         122/15       123/15       123/15       124/11         129/15       130/23       130/23       130/23         136/6       136/25       137/6       20/10       21/9       21/16       22/16         136/6       136/25       137/6       23/17       24/14       25/2       26/4         139/9       141/11       141/16       34/12       34/14       35/20         141/18       142/8       145/1       34/12       34/14       35/20         150/13       150/20       15/16       34/12       34/14       35/20         150/13       150/20       15/16       34/22       44/13       35/20         150/13       150/20       15/16       53/23       56/26       63/6         64/13       65/22       66/9       64/20       64/20       69/27       72/13       72/22       75/25       77/13       77/13       72/22       75/25       77/14       77/13       72/22       75/25       77/14       77/14       105/3       105/3       105/3       10/14       105/11       10/14       10/14       10/14       10/14       10/14       10/14       10/14       1   |                       | 8/9 8/24 9/17 13/1    |                       |  |
| 125/23 125/23 129/8       17/2 18/11 19/17         129/15 130/23 130/23       20/10 21/9 22/6         136/6 136/25 137/6       23/17 24/4 25/2 26/4         139/9 141/11 141/16       27/5 28/16 34/8 34/11         14/1/8 142/8 145/1       39/2 44/13 43/23         14/1/18 142/8 145/1       39/2 44/13 43/23         150/13 150/20 151/6       53/23 56/25 63/6         157/9 157/22 158/13       68/20 69/21 70/22         157/9 157/22 158/13       68/20 69/21 70/22         157/9 157/22 158/13       77/20 79/13 80/16         170/15 171/19 172/14       81/7 82/12 83/3 85/3         176/9 178/17 179/15       97/6 99/25 102/18         180/15 180/17 181/15       105/3 105/5 107/4         190/1 192/10 192/15       114/14 114/16 116/7         191/2 192/11 186/4       11/1/1 109/12 109/14         190/1 192/10 192/15       11/1/11 11/25         193/1 193/13 193/18       114/14 114/16 116/7         191/2 203/15 205/19       11/22 118/17 118/25         195/22 195/14 195/19       11/2/21 18/17 118/25         198/10 198/14 199/14       120/12 12/12 12/10         198/10 198/14 199/14       120/12 12/12 12/10         198/10 198/14 199/14       120/12 13/125         198/10 198/14 199/14       120/12 13/125         128  |                       |                       |                       |  |
| 129/15       130/23       130/23       20/10       21/17       24/25/2       26/4         136/6       136/25       137/6       27/5       28/17       24/12       26/4         139/9       141/11       141/16       27/5       28/14       34/12       34/14       35/20         139/9       141/11       141/16       14/12       34/14       35/20       39/24       41/3       39/24       41/3       39/24       41/3       39/24       41/3       32/23       56/25       53/6       53/23       56/25       63/6       53/23       56/22       66/9       66/20<   |                       |                       |                       |  |
| 136/6 136/25 137/6       23/17 24/4 25/2 26/4         139/9 141/11 141/16       27/5 28/64 34/6 34/11         141/18 142/8 145/1       34/12 34/14 35/20         141/18 142/8 145/1       39/24 41/3 43/23         147/17 148/17 148/12       39/24 41/3 43/23         150/13 150/20 151/6       53/23 56/25 63/6         157/9 157/22 158/13       64/13 65/22 66/9         61/20 69/21 70/22       72/13 72/27 75/25         70/15 17/119 172/21 73/22       77/12 79/13 80/16         170/15 17/119 172/24 173/22       91/25 92/1 94/2 97/4         91/25 92/1 94/2 97/4       91/25 92/1 94/2 97/4         91/25 92/1 94/2 97/4       91/25 92/1 94/2 97/4         91/25 92/1 94/2 97/4       91/25 92/1 94/2 97/4         91/25 92/1 94/2 97/4       91/25 92/1 94/2 97/4         91/25 92/1 94/2 97/4       91/25 92/1 94/2 97/4         91/25 92/1 94/2 97/4       91/25 92/1 94/2 97/4         180/15 180/17 181/15       105/3 105/5 107/4         180/15 180/17 181/15       105/3 105/5 107/4         190/1 192/10 192/15       114/14 116/16 116/7         193/1 193/13 193/14       111/11 12/10 113/25         111/11 12/10 113/25       12/13 12/16 12/17         12/22 12/3 21/21 12/21 12/1/10       12/13 12/16 12/17         12/13 22/123 21/41 22/21       12/1  |                       |                       |                       |  |
| 13/19/14/11/14/16/16       34/12/8/14/8/20         14/1/8/14/8/14/8/10       39/24/1/3/3/23         14/1/8/14/8/14/8/10       39/24/1/3/3/23         150/13/150/20/151/6       39/26/26/3/6         150/13/150/20/151/6       53/23/56/25/63/6         157/9/157/22/158/13       68/20/69/21/70/22         157/9/157/22/158/13       68/20/69/21/70/22         167/12/16/17/19/172/14       77/20/79/13/80/16         170/15       171/19/172/17         170/15       77/20/79/13/80/16         170/15       77/20/79/13/80/16         180/15/180/17/18/115       105/5/107/4         180/15/180/17/18/115       105/5/107/4         180/15/180/17/18/115       105/3/105/5/107/4         193/13/19/18       144/14/14/16/16/7         193/13/19/18/16       110/11/12/10/13/25         193/14/19/14       190/12         193/13/19/16       116/14/16/16/7         193/13/19/16       120/12/22/11/10         192/19/12/20/15/20/16       120/12/2         193/13/19/16       120/12/2         116/211/12/21/2       121/11/11/2         122/22/21/2/22/16/16       120/12/2         121/6/211/12/21/2       121/16         121/6/211/2       121/16/21/1         121/16/211/2   |                       | 23/17 24/4 25/2 26/4  |                       |  |
| 14/17/13       14/13       15/22       15/21 <td< th=""><th>139/9 141/11 141/16</th><th></th><th></th><th></th></td<>  | 139/9 141/11 141/16   |                       |                       |  |
| 14/1/11/146/10       43/24       44/8       51/22         150/13       150/14       160/17       170/12       170/15       171/19       172/13       72/22       75/25       170/13       170/13       170/13       170/13       170/14       170/20       70/13       180/14       181/78       170/14       170/20       70/13       180/14       181/78       170/15       170/14       170/15       170/14       170/20       170/22       170/22       170/14       170/20       170/21       170/22       170/22       170/22       170/21       170/21       170/21       170/22       170/21       170/22       170/21       170/22       170/21       170/21       170/21       170/21       170/21       170/21       170/21       170/21       170/21       170/21       170/21       170/21       170/21  | 141/18 142/8 145/1    |                       |                       |  |
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