

Witness Name: Barbara Longley

Statement No.: WITN0450100_02

Exhibits: WITN0450100_02/1 to WITN0450100_02/14

Dated: 8 February 2023

POST OFFICE HORIZON IT INQUIRY

SECOND WITNESS STATEMENT OF BARBARA LONGLEY

I, *MS BARBARA LONGLEY*, will say as follows:

INTRODUCTION

1. This witness statement is made to assist the Post Office Horizon IT Inquiry (the “**Inquiry**”) with the matters set out in the Rule 9 Request provided to me on 16 January 2023 (the “**Request**”), some of which were subject to further clarification by the Inquiry by way of separate email dated 18 January 2023, to the extent I have or had direct knowledge of such matters. In preparing this witness statement, I have been assisted by Morrison Foerster, the recognised legal representatives for Fujitsu Services Limited in the Inquiry. Morrison Foerster did not assist me in relation to my first witness statement dated 12 September 2022 (“**First Witness Statement**”), which I prepared with assistance from the Inquiry.
2. The topics set out in the Request concern events that occurred between 17 and 27 years ago. In this statement, I have set out my best recollection of these events, which build upon information provided in my First Witness Statement and relate to calls (also known as PinICLs, Peaks or incidents) regarding the

Horizon IT system (“**Horizon**”). While I have tried my best to remember these events, due to the time that has passed and the clerical nature of my role, which I explain further below, my ability to remember and provide information concerning these events is limited.

3. As requested by the Inquiry, I have reviewed the documents referenced by the Inquiry in the Request. These documents are referenced WITN0450100_02/1 to WITN0450100_02/14 and are set out in the index accompanying this statement.

GENERAL QUESTIONS RELATING TO MY FIRST WITNESS STATEMENT

The SSC Co-ordinator role

4. As I state in the First Witness Statement, I joined the Software Support Centre (“**SSC**”) as SSC Co-ordinator in 1998. I retired from work, leaving the SSC and Fujitsu, in September 2005.
5. The SSC Co-ordinator role was clerical. My responsibilities in relation to Horizon included assigning calls to technicians in the SSC by reference to their areas of expertise (this is explained in more detail below), arranging rotas, maintaining annual leave records, photocopying, scheduling appraisals and managing stationery and the post. My role was not technical, and I provided no technical input in relation to Horizon during my time in the SSC.
6. I was the only SSC Co-ordinator in the SSC and generally work from 9AM to 5PM. Outside of business hours, a duty technician in the SSC would perform my role.

7. I remember that, as SSC Co-ordinator, the process for receiving and assigning calls was as follows:
- a. The first line support team at Fujitsu (known as the “**Horizon Helpdesk**”) would put calls on my ‘stack’ in the form of Peaks/PinICLs. The calls would come in on my screen, and I would read each call and allocate it to an SSC technician.
 - b. The SSC technicians were specialised in different areas of Horizon, and I would allocate the call to an SSC technician based on the area that the call appeared to relate to. I would try and determine this by looking for key words in the Peak/PinICL. I knew which SSC technicians did what, and I would check with them before allocating the call. If I was unsure of which area of the system a call related to, I would ask an SSC technician to clarify. There were generally multiple technicians who specialised in each area, so other factors I would consider were their workload, and whether they were on personal leave or annual leave at the relevant time.
 - c. I do not recall there being any particular challenges to allocating calls because I could always check with the SSC technicians or SSC manager if I was unsure about whether I was allocating the call to the right SSC technician. Sometimes, the SSC technicians would let me know that they wanted to work on a particular call, because they were interested in the problem or issue that was reported, or because it related to work that they had done previously.

- d. I did not prioritise calls, which would be prioritised before coming into the SSC, and did not have the technical knowledge to personally override a priority already set by first line support. The SSC technicians would sometimes ask me to change the priority of the call but I do not recall them explaining why the changes were necessary.
 - e. The SSC worked in the same area of the office in Bracknell, and this process of confirming and discussing call allocations was mostly done in person. I would walk over to the SSC technicians and SSC manager if I needed to ask a question about an allocation or any other matter.
8. After the call had been allocated to the SSC technician, I would update calls as instructed as investigations progressed. As part of this work, I would update calls and take actions on the system as directed by the SSC technicians, the SSC manager and other teams. I would also update calls to record communications between SSC technicians and others, including other Fujitsu teams, Post Office Counters Limited (“**POCL**”) and users (for example, postmasters), to the extent that I was provided with the information and asked to include it.
9. For example, I would sometimes be telephoned by the Fujitsu Horizon Helpdesk when they needed an update on the progress of the call from the SSC technician. I would then let the SSC technician know, so that they could contact the caller to provide an update. I would make entries in the call to record these communications.
10. All of my call entries were based on information provided to me by SSC technicians and others, and I would type in what they said to me over the phone,

in person at my desk, or I would copy and paste their notes and emails into the call (see, for example, WITN0450100_02/1). I had (and still have) no technical understanding of the content of the entries I was inputting. I did not provide any technical input into these entries, make decisions about how an investigation should be progressed, and I never closed calls on my own initiative. All updates and closure instructions came to me in various forms from SSC technicians and other teams, including assigning calls to other teams and closure categories (see, for example, WITN0450100_02/2 and WITN0450100_02/3).

11. I did not deal with users, including postmasters or others working at Post Office branches, by phone or by email. Users could not contact me at the SSC, as my phone number was never provided. Neither did my role involve making phone calls to users. User contact was with the Horizon Helpdesk, and SSC technicians would sometimes contact users.
12. I cannot recall how frequently I would receive or manage calls involving known errors on Horizon, known workarounds, or problems that were categorised as user error. I did not decide on these matters within the SSC, which were the responsibility of SSC technicians and the SSC manager. For the reasons I have explained above, I do not, and did not, have the technical knowledge or experience to understand the substance of the calls that I was allocating. In reviewing the documents that the Inquiry has provided to me, however, I noted that page 109 of the Expert Witness Report of Charles Cipione dated 14 September 2022 (“**Expert Witness Report**”) (WITN0450100_02/4) describes a monthly ICL Pathway report that seems to contain information about the SSC.

Horizon Rollout

13. In the Request, the Inquiry has asked me to clarify my involvement in the Horizon roll out and asked that I explain how my statements at paragraph 3 of the First Witness Statement are consistent with my statements at paragraphs 20 and 22 of the First Witness Statement.
14. At the time of writing the First Witness Statement, I did not recall that the Horizon roll out had taken place from 1999 to 2000. I still do not recall any roll out having taken place. I was, however, aware of new releases. If a roll out did take place during my time as the SSC Co-ordinator, the role I would have performed would have in no way differed from my role at any other time.

My involvement in meetings with POCL

15. As requested by the Inquiry, I have considered paragraph 51 of the witness statement of David McDonnell dated 3 November 2022 (WITN0450100_02/5) and lines 1 to 8 of the transcript of Mr McDonnell's hearing on 16 November 2022.
16. I was never an employee of POCL, or a 'POCL representative', and I did not attend any meetings involving POCL and ICL Pathway Limited (or Fujitsu). As a non-technical clerical worker, I would have had no place in meetings relating to the design and development of Horizon.
17. As SSC Co-Ordinator, my role also required me to remain at my desk to answer phone calls that were coming into the SSC. During my breaks, the duty technician would cover me, including to answer calls.

18. I cannot say whether POCL would have known there were problems with the Electronic Point of Sale Service system by the very nature of my entries on various Peaks because (i) I was never a POCL employee or 'POCL representative', (ii) I did not provide any technical input in relation to calls, and (iii) my entries on various calls were made for record-keeping purposes and under instruction from others.

My involvement in Peaks and PinICLs

19. As requested by the Inquiry, I have considered section 16 of the Expert Witness Report (WITN0450100_02/4), and paragraphs 3, 9 and 24 of the First Witness Statement.
20. The Inquiry has asked me to comment on a table in the Expert Witness Report listing "*[u]sers involved*" in PinICLs and Peaks, which notes I was involved in more PinICLs and Peaks than any other operative in the period 1996 to 2000. As I have mentioned above and in the First Witness Statement, as SSC Co-ordinator, my role included assigning calls to SSC technicians, adding entries to PinICLs and Peaks to record communications from others, and closing calls upon instruction from SSC technicians. For these reasons, it does not surprise me that my name appears more frequently on PinICL and Peak records than any other individual during my time as SSC Co-ordinator. I was "involved" in the PinICL or Peak, but the nature of my involvement was clerical, not technical. I understood that these incidents were reports of issues with Horizon, and the SSC technicians were investigating and dealing with them. I did not understand the technical nature of the issues being raised and dealt with and the words in the PinICL / Peak records are not my own.

21. At paragraphs 3 and 9 of the First Witness Statement, I state there were no complaints about how I would assign calls to SSC technicians based on the areas that the technicians were specialised in. I was referring to internal Fujitsu complaints about the way calls were handled by the SSC. In fact, I received very good feedback on my performance in my performance reviews.

PEAK ENTRIES

22. As requested by the Inquiry, I have considered WITN0450100_02/6 to WITN0450100_02/8, which are a series of Peaks. The Inquiry has asked me to consider and explain specific entries made in these Peaks, which were recorded by me or others.
23. For the reasons that I have set out above, particularly in paragraphs 7 to 10, I cannot explain technical matters relating to Horizon or the technical content of the entries, including the bases upon which decisions were taken to close a call, explaining and interpreting what SSC technicians meant by their entries, or whether there was adequate accountability between the teams to resolve issues. SSC technicians and SSC managers may be in a better position to explain these matters.
24. Having considered the Peaks exhibited at WITN0450100_02/6 to WITN0450100_02/8, I do remember the following:
- a. When allocating a call to SSC technicians, I would review the call summary, which I believe was written by the Horizon Helpdesk and copied automatically to the Peak / PinICL record in the 'stack'. If there was an obvious typographical error, or the summary was unclear but written in a way where I could make obvious changes to improve its

content, I would reword or shorten the summary to make it clearer. SSC technicians would also tell me to change the summary and suggest a better description in some instances.

- b. Although I would have updated Target Releases in Peak / PinICL records, I would only have done so at the instruction of SSC technicians. I did not (and do not) understand the meaning of the different release names. I do, however, recall that the SSC manager would inform the team when a release had been rolled out so that the next Target Release could be used.
- c. I would be told the reasons for needing to reassign a call to other members of the SSC if I had misassigned the call. These reasons would vary, and included the SSC technician not having time to manage the call, another SSC technician having better knowledge and experience to deal with the call, or by agreement between the SSC technicians. As explained above in this statement, I would generally discuss the allocation of calls with SSC technicians to avoid this from happening.
- d. As I state above at paragraph 7(d), calls would be prioritised before being received by the SSC. I would change the priority of calls if asked by an SSC technician or the SSC manager. I cannot recall the priority categories, however I remember that the highest priority was given to calls where the Post Office branch was not operating. The SSC would drop everything to respond to these calls, even if that meant they had to stay behind and work late.

25. I do not recall who "PowerHelp" and "EPOSS-FP" were or their role.

26. Given the clerical nature of my role, I cannot comment on the adequacy of the processes followed to resolve issues with Horizon.

Peak PC0065021

27. In relation to WITN0450100_02/1, I have reviewed the Peak entries made at 4.23pm on 6 August 2001, 8.23am and 8.24am on 7 August 2001, and 12.12pm on 13 August 2001.
28. While I cannot remember making these entries, it appears the entries I made at 4.23pm on 6 August 2001 and 8.23am on 7 August 2001 were based on information provided by others. The entry at 4.23pm on 6 August 2001 notes that "*Becky from Manchester*" will email me the transaction details given by the subpostmaster and I will "*paste*" them into the call. The entry at 8.23am on 7 August 2001 appears to contain transaction details and the reference ends with "*thanks Beccy*".
29. The entry made at 12.12pm on 13 August 2001 does not appear to have been made by me but appears to be based on information provided by the Horizon Helpdesk.

Other Peak Records

30. The Inquiry's questions in relation to the remaining Peak records provided to me (WITN0450100_02/9 to WITN0450100_02/14) were of a discrete technical nature.
31. As explained above, and in my First Witness Statement, my role as SSC Coordinator was purely clerical. I had no technical understanding of how Horizon worked and was not involved in the substance of how issues with

Horizon were investigated and resolved. Unfortunately, I am not therefore able to assist the Inquiry with the technical questions it has asked me. I suggest that the Inquiry asks these questions to SSC technicians or SSC managers instead who have a technical understanding of the system.

Statement of Truth

I believe the content of this statement to be true.

Signed: _____ **GRO**
Dated: 8 / 2 / 2023 ,

**INDEX TO THE SECOND WITNESS STATEMENT OF
MS BARBARA LONGLEY**

| Exhibit No. | URN | Document Description | Control No. |
|--------------------|--------------|--|--------------------|
| WITN0450100_02/1 | POL00028882 | Peak PC0065021 | POL-0025364 |
| WITN0450100_02/2 | FUJ00068025 | Peak PC0054747 | POINQ0076508F |
| WITN0450100_02/3 | FUJ00064175 | Peak PC0048757 | POINQ0071784F |
| WITN0450100_02/4 | EXPG0000001 | Expert Report of Charles Cipione, IT Expert to the Inquiry | EXPG0000001 |
| WITN0450100_02/5 | WITN00620100 | Witness statement of David McDonnell | WITN00620100 |
| WITN0450100_02/6 | FUJ00066611 | Peak PC0053216 | POINQ0074772F |
| WITN0450100_02/7 | FUJ00067416 | Peak PC0045061 | POINQ0075856F |
| WITN0450100_02/8 | FUJ00068069 | Peak PC0054639 | POINQ0076571F |
| WITN0450100_02/9 | FUJ00062132 | Peak PC0049096 | POINQ0069577F |
| WITN0450100_02/10 | FUJ00062228 | Peak PC0049308 | POINQ0069673F |
| WITN0450100_02/11 | FUJ00062286 | Peak PC0048553 | POINQ0069731F |
| WITN0450100_02/12 | FUJ00067709 | Peak PC0054375 | POINQ0076173F |
| WITN0450100_02/13 | FUJ00066821 | Peak PC0052526 | POINQ0075173F |
| WITN0450100_02/14 | FUJ00068989 | Peak PC0055713 | POINQ0077585F |