

Witness Name: Davlyn Cumberland

Statement No.: WITN09130100

Dated: 6.6.2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF DAVLYN CUMBERLAND

I, Davlyn Cumberland, 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 dated 24 April 2023 (the "Request"). I have received advice and assistance from a lawyer in the preparation of this statement.

My professional background

2. I am an employee of Post Office Ltd ("POL") and have worked in a number of roles since 1990. The dates I have given in the account below are accurate to the best of my recollection.
3. I originally started working for POL in August 1990 as a counter clerk. During the first few years I worked in a variety of main Post Office branches in Wokingham,

Bracknell, Camberley, Reading and Salford City.

4. I had a 6-month break in 1993 and returned as a casual worker at Camberley Post Office in 1994. That role became permanent. After a few months I transferred to Reading Post Office and then went on to work as an on-site trainer for a period of 18 months before returning to work in Reading Post Office in 1996.
5. In 1999 I moved north and worked for a brief period at Salford City Post Office before joining the Horizon Implementation Programme in September 1999 as a Horizon Field Support Officer.
6. In 2001 I joined a programme called the Retail Line Review Trial and worked in an admin/support advisors' role. Two new teams evolved from this, the Performance Improvement Team and the Suspense Account Team. I spent several months working in both teams.
7. In 2004 I joined the Network Reinvention Project in an admin support role, which involved approving processing grant applications from independent sub-postmasters.
8. In 2005 I was promoted to the role of Area Intervention Manager, providing on-site support and guidance to Post Office branch staff, sub-postmasters and managers.
9. In 2006 I was promoted again to the role of Contact Issues Manager. In that role I managed the administrative support team who supported the contract managers nationally. The team were required to send letters, acknowledge resignations, arrange completion of vacancy reports, book interviews, answer queries or escalate queries to the relevant contract manager. This was a new role which

evolved over a period of two years. I became involved with implementing new processes such as the process of appointing temporary postmasters. I worked in this role until 2008.

10. I took a further career break, this time for four years, before re-joining POL in 2012 to work on the Network Transformation Programme as a Field Change Advisor.
11. In 2013 I joined the On-site Training Team where I have worked to this day, apart from a period from August 2022 to April 2023 when I was on temporary secondment to the Training Scheduling Team.

My role in the Suspense Account Team

12. I have been asked to describe in particular my role in the Suspense Account Team, and I have set out an account of this here as I remember it to the best of my knowledge.
13. As I mentioned above, from 2001 until 2004 I worked in a team that was initially called the Retail Line Review Trial. The Retail Line Review, as far as I can recall, involved centralising the support from the regional helplines to the new Network Business Support Centre and closing the regional area offices (with the exception of the area offices which served the rural network).
14. The Retail Line Review split the Post Office branch network into two categories: Community (Rural) and Commercial. The Rural network was supported by area offices and the Commercial network was supported by Retail Line Managers.
15. Two new centralised teams were also formed and were initially based at the

Network Business Support Centre in Barnsley. These two teams were called the Suspense Account Team and the Performance Improvement Team. I worked in both teams.

16. My role in the Suspense Account Team was to contact Post Office branches by telephone to discuss and, if necessary, raise queries about unauthorised discrepancies (representing unaccounted for losses and gains) held in the suspense account, using the data supplied to my line manager every month from a team based in Chesterfield. My line manager would then distribute the workload throughout the team.
17. In addition, I was required to contact Post Office branches by telephone whenever a call had been escalated to our team by an advisor in the Network Business Support Centre, which was the first point of contact for sub-postmasters, managers or branch staff seeking authorisation to hold a discrepancy in the suspense account for a limited period. My role was to authorise the discrepancy to be placed into the suspense account, if the discrepancy was a result of a known accounting error. When the discrepancy wasn't authorised, I would offer guidance to help locate the cause of the accounting error/discrepancy; for example, to check documentation dispatched to savings bank and Giro bank, cheques sent for processing, cash and stock remittances in and out of the branch, automated payments (bills), currency and travellers cheques had been entered correctly, and that pensions and allowances paid to customers agreed with docketts on hand. Key stroke mistakes were sometimes the cause of discrepancies, for example someone entering £800 rather than £80.
18. These calls could be quite stressful and uncomfortable on occasions, because

not all discrepancies would get authorised, and people would sometimes become upset. After a period of approximately 6 months, I wasn't really enjoying the job, mainly due to the nature of the work and because I didn't find it rewarding or interesting, so I asked to transfer to the Performance Improvement Team which had then been relocated from the Network Business Support centre in Barnsley to Chesterfield.

19. My role as an advisor in the Performance Improvement Team involved contacting Post Office branches by telephone to discuss accounting and data input errors, based on monthly data supplied by a team in Chesterfield to my line manager. My line manager would then distribute the workload throughout the team. These were non-financial data input errors which would not cause the branch account to have any discrepancies.
20. My role was to offer support and guidance to rectify errors and talk people through correct procedures. The aim was to help the branch staff understand correct procedures so that, going forward, they could implement changes to improve performance in relation to reporting of transactions.
21. I spent approximately six to nine months working in the Performance Improvement Team, but it became difficult to continue because the travelling commitments were excessive. Eventually I asked to return to the Suspense Account Team because less travelling was involved.
22. I have been asked to describe the role of the Suspense Account Team. It has been a long time since I worked in the Suspense Account Team, but I have tried to describe its role to the best of my recollection.
23. The role of the Suspense Account Team was to monitor and manage

discrepancies being held in the suspense account across the Post Office branch network. The objective was to reduce the number of discrepancies held in individual Post Office branch suspense accounts.

24. If a discrepancy showing in the suspense account was due to a known transactional error, with an expected correction to be issued by the relevant team in Chesterfield and where proof such as documentation was supplied (for example, a cash in payment had been written as a withdrawal, or if the error was verified by the relevant team – such as the savings bank, cheque processing, Giro bank, cash centre, or automated payments teams) the discrepancy would be authorised and it could be held in the suspense account up to eight weeks until the correction had been issued. A reference number for the authorisation would be provided.
25. If the discrepancy was not due to a known transactional error, then we would discuss this with the Post Office branch manager/sub-postmaster, explain that it wasn't an authorised discrepancy, and request that the discrepancy be removed from the suspense account before the next cash account due date. Any loss had to be made good either by cheque or cash, and any gain corrected by a withdrawal of cash.
26. If a branch had any difficulty with this process or said that they were not able to make good the amount, we would the escalate the case to the relevant area manager for Rural branches or the Retail Line Manager for Commercial branches.
27. In some cases, a hardship application would be submitted. If this was agreed, a discrepancy could be made good by making deductions from monthly

remuneration.

28. Another part of the Suspense Account Team's role was to telephone Post Office branches when a Network Business Support Centre advisor escalated a call to our team. This usually happened when a branch sought authorisation to hold a discrepancy in the suspense account due to a known error. Our role was to assist and support the branch to locate the error. Sometimes the error would get resolved during the call, sometimes the branch would call back to say they had found the discrepancy.

Early Involvement in relation to Marine Drive Post Office

29. I have been asked to explain my recollection of my involvement in the Marine Drive Post Office, where Lee Castleton was the sub-postmaster. My attention has been drawn to some documents, including the note of decision to terminate Mr Castleton's contract on 10 May 2004 (POL00070758) and a witness statement I made in a civil case involving POL and Mr Castleton dated 2 October 2006 (LCAS0000566).
30. The events described in these documents took place a very long time ago, and I'm sorry to say that I have no recollection of them or of any involvement I had in them. I cannot recall making the witness statement at LCAS0000566.
31. The note at POL00070758 says that I and my colleague Elizabeth (Liz) Morgan helped to explain some discrepancies in the final balance figures, and I note that I said in my witness statement at LCAS0000566 (at paragraph 3) that I was asked by Liz to examine some branch accounts she had been sent by Catherine Oglesby, Mr Castleton's Retail Line Manager. I have some recollection of Liz

Morgan asking me to look at some branch paperwork to see if I could spot any errors or abnormalities, but I can't remember anything about which Post Office branch this related to or what the outcome was.

32. Liz Morgan and I worked together in the Suspense Account Team. We were a small close-knit team, and it was usual practice to ask for assistance from colleagues. Although checking branch accounts was not officially part of our role, I can recall a few occasions when a Retail Line Manager or Area Manager would ask for our help with checking branch weekly accounts and possibly the transaction logs. I recall that Liz was well known within POL, especially in the north, because she worked in the audit team for many years. It wasn't unusual for her to offer to check branch accounts although, as I said, it wasn't officially part of our role. I cannot recall how many occasions she asked for my help.
33. During my Post Office career, I have gained knowledge and experience by supporting sub-postmasters and their staff with back-office duties and weekly balancing. Looking back to the time when the events described in POL00070758 and LCAS0000566 took place, I believe I would have had a good understanding of the Post Office branch weekly accounting system. This was gained from working as an on-site trainer between 1994 and 1996, using both the old manual accounting system and an electronic system (Ecco+) used at the time in our Crown branches, and working on the Horizon Implementation Team as a Field Support Officer, a job which involved the migration of manual data onto the new Horizon system then staying on-site to offer support including completion of the first weekly balance.
34. I am unable to recall carrying out the task of looking at the accounts for the Marine

Drive branch, of any steps that I took or of any documents that I was provided. The note at POL00070758 suggests that Liz Morgan and I came to a view about the figures in the accounts and whether there was anything wrong with the Horizon system, and I said in my witness statement at LCAS0000566 that we were unable to find anything unusual or evidence that the losses were not genuine, but I am afraid that I cannot recall anything about how I came to that view. I don't recall having any discussions with Catherine Oglesby.

35. I have no recollection of any other Post Office branches reporting discrepancies caused by the Horizon system at this time.
36. I have been asked if Liz Morgan or I considered requesting further information from Fujitsu. As I say, I cannot recall any specific details of the Marine Drive case, but I am satisfied that we would not have had the authority to involve any other teams such as Fujitsu as this would be a matter for the investigation teams. As I said before, the checking of branch accounts was not officially part of our role. This was done on a few occasions as a favour to help out Retail Line Managers and Area Managers.
37. I have been asked to explain my understanding of Mr Castleton's personal financial situation at this time and who was responsible for decisions about hardship applications. Again, I cannot recall any specific details of this case. Decisions on hardship applications were not part of my role, so I think it unlikely I would have had any conversations about Mr Castleton's personal financial situation. Decisions regarding hardship applications were usually from the Retail Line Manager or Area Manager.

38. I cannot recall having any involvement with Mr Castleton's case or the Marine Drive Post Office prior to the civil litigation referred to in the Request.

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39. I have already referred to the witness statement I made in 2006 at LCAS0000566 and that I cannot recall these events or making the statement. Neither can I recall being involved in any other legal proceedings involving the Horizon system.

40. My attention has been drawn to an email that Stephen Dilley, a solicitor at Bond Pearce LLP, sent to Liz Morgan and I on 22 August 2006 (POL00071073). The email describes legal action POL was taking to recover losses accrued while Mr Castleton was sub-postmaster at the Marine Drive Post Office. It appears to be the case that Mr Dilley asked me to provide a witness statement, and that I did so, but I am afraid I have no recollection of being asked to make a statement or of making the statement.

41. There is also a note of a telephone call I had with Mr Dilley on 2 October 2006 about a witness statement I had prepared and the process for approving it (POL00072707). I cannot recall the details of this conversation, or of any other conversations with any other lawyers representing POL. I have no recollection of being told about, or being given any details about Mr Castleton's defence or counterclaim, or of having any involvement in the disclosure process during these proceedings.

42. I am afraid I cannot offer any observations about this legal case since I genuinely cannot recall anything about it or what part I played in it.

Other Civil and Criminal Cases

43. I have been asked about my recollection of a number of other individuals who were the subject of criminal and civil proceedings, but none of the names are familiar to me and I have no recollection of any cases involving them.
44. To my knowledge I haven't been involved in any investigations or criminal prosecutions to do with the Horizon system, nor have I been involved in any civil cases (apart from providing a witness statement in Mr Castleton's case in 2006).

Knowledge of Bugs, Errors and Defects in the Horizon System

45. I am asked to describe whether I had, or was aware of, any concerns about the robustness of the Horizon system during my time at POL. During my time working for POL, I have not been aware of or witnessed any bugs, errors or defects in the Horizon system whilst performing my daily duties. Working with the Horizon system has never given me any cause for concern.
46. I did become aware of some sub-postmasters taking legal action against POL and that they had claimed that faults in the Horizon system had resulted in accounting discrepancies. I cannot remember exactly when this was, but think it must have been after I started working for POL again in 2012. Nor do I recall how exactly this was brought to my attention. I recall that senior management at the time provided us with a standard response (although I don't recall the specific wording) to any questions raised by branch staff while we were outperforming our daily roles. To my knowledge, the first time POL acknowledged there could be a problem with the Horizon system was during the group litigation case. I think this was at some point in 2019 but can't be certain of the exact date.

Other Matters

47. There are no other matters I wish to bring to the attention of the Chair of the Inquiry.

Statement of Truth

I believe the content of this statement to be true.

Signed: **GRO**

Davlyn Cumberland (Jun 6, 2023, 8:29am)

Dated: 06 Jun 2023

Index to First Witness Statement of Davlyn Cumberland

No.	URN	Document Description
1.	POL00070758	Note of decision to terminate Lee Castleton's contract, 10.5.2004
2.	LCAS0000566	Witness Statement of Davlyn Cumberland made in <i>Post Office Ltd v Castleton</i> case, 2.10.06
3.	POL00071073	Email from Stephen Dilley, Bond Pearce LLP, 22.8.2006
4.	POL00072707	Telephone attendance note taken Stephen Dilley, Bond Pearce LLP, 2.10.2006

