

Witness Name: Rajbinder Sangha

Statement No.: WITN10300100

Dated: 20 December 2023

## POST OFFICE HORIZON IT INQUIRY

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### FIRST WITNESS STATEMENT OF RAJBINDER SANGHA (NÉE BAINS)

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I, *RAJBINDER SANGHA*, will say as follows:

#### **INTRODUCTION**

1. I am currently a Release Management Co-ordinator in the Release Management team, which is part of the Post Office Account team (“**POA**”) in Fujitsu Services Limited (“**Fujitsu**”). My current role facilitates the administrative process when software is deployed to counters, and I am responsible for raising and forwarding release notes to Post Office Limited (“**POL**”). I have held my current position since January 2017.
2. This witness statement is made to assist the Post Office Horizon IT Inquiry (the “**Inquiry**”) with the matters put to me in a Rule 9 Request dated 1 December 2023 (the “**Request**”), to the extent I have or had direct knowledge of such matters. I was assisted in preparing this statement by Morrison Foerster, the recognised legal representatives for Fujitsu in the Inquiry.

3. Many of the matters set out in the Request concern events that took place between 7 and 13 years ago. I have tried my best to recall these events and matters to assist the Inquiry, but there are areas where my recollection is limited. The content of my witness statement therefore focuses largely on the content of the documents provided to me by the Inquiry. Where my recollection has been assisted by documents, I set out the URN of the relevant document below.

### **BACKGROUND**

4. The Inquiry has asked me to set out my professional background, including a summary of my career, qualifications and the positions I have held at Fujitsu.
5. Following high school I went to Thames Valley University, completing a Higher National Diploma in Business Information in 2003, and a Bachelor of Science in Information Systems in 2005.
6. After university and before joining Fujitsu, I held the following roles:
  - a. February 2005 to November 2005—I was a Telephone Executive at MCI.
  - b. February 2006 to April 2006—I undertook various temporary administration and reception assignments.
  - c. April 2006 to September 2006—I was a Customer Service Liaison Officer at Dell Computer House.
  - d. October 2006 to August 2009—I was a Senior Administrator at RelQ/EDS (a Hewlett Packard company).

7. Between September 2009 and June 2010, I took time off from work. In July 2010, I joined Fujitsu as a Fraud and Litigation Support Officer in the Fraud and Litigation Support Office, which was part of the Security team in the POA's Customer Service department ("**CSPOA Security Team**"). My role initially was to process Audit Request Queries (each an "**ARQ**") from POL, which I explain below. I then became involved in additional tasks, which included:
  - a. User Management, which involved maintaining a database with the user permissions of all Fujitsu employees;
  - b. processing security check applications for new sub-postmasters; and
  - c. working on reconciliation, which involved dealing with transactions that had not completed over the counter.
  
8. I went on leave in April 2016. Upon returning from leave in January 2017, I commenced in a new role within the POA in the Release Management department, which I hold to this date. My work in this role includes (i) managing counter releases with POL, and (ii) processing PODG (Post Office Data Gateway) requests, also known as OBC19 (Operational Business Change requests) from POL, which entails setting up new routes, or amending existing routes of sending and receiving data to POL's clients.

#### **FRAUD AND LITIGATION SUPPORT OFFICER ROLE**

9. The Inquiry has asked me to set out my role in relation to POL disciplinary matters, those accused of criminal offences, civil or criminal proceedings, witness evidence

and the extraction of audit data, in connection with the Horizon IT system (“**Horizon**”). The Inquiry has also asked me to provide an overview of the organisational structure within Fujitsu for the provision of litigation support to POL.

10. As noted above, I became a Fraud and Litigation Support Officer in the CSPOA Security Team in July 2010.
11. My role was to process ARQ requests for audit data received from POL, as well as internal ARQ requests from Fujitsu staff, which I explain further in paragraphs 15 and 23 of this statement. For POL requests, the ARQ request would be sent by POL to the ‘CSPOA Security’ mailbox by email. Once received, I would follow a process to extract the audit data requested by POL from the Audit workstations. I would undertake the data extraction in a secure room which could only be accessed by myself and other CSPOA Security Team members, which included Andy Dunks, Penelope Thomas, and Donna Munro. Once the data was extracted, I would send the data to POL on a CD via Royal Mail special delivery. As part of the ARQ process, I would verify that the data requested by POL had been provided.
12. I worked alongside Mr Dunks and Ms Thomas, who were also Fraud and Litigation Support Officers, and my line manager was Ms Munro. Mr Dunks and Ms Thomas dealt with ARQ requests for audit data, however they also performed other functions relating to litigation support provided by Fujitsu to POL. These other functions included providing Fujitsu Helpdesk call logs and witness statements to POL and attending court proceedings. Other than witnessing the signing of witness statements, which I explain below at paragraph 20, I was not involved in these

aspects of litigation support and my role was limited to processing the audit data extraction for ARQ requests.

13. During my time in the CSPOA Security Team, I did not provide any witness statements or attend court to give oral evidence. In order to refresh my memory, I have been provided with emails involving myself, Ms Thomas, Ms Munro and Mr Dunks (among others) dated in September 2010 (FUJ00156224, FUJ00225726 and FUJ00123081). Having reviewed these emails, I can see that in around September 2010, I was asked to provide a witness statement in relation to an ARQ request that I actioned (FUJ00156224). While I cannot recall if it was in relation to this ARQ request, I can recall speaking with Ms Munro and agreeing that all witness statement requests would be actioned by Ms Thomas and Mr Dunks as they had more experience and knowledge of Horizon.
14. Over time, the CSPOA Security Team expanded as it took on more work, including in relation to User Management and reconciliation.
15. I have been asked by the Inquiry to (i) describe my working relationship with Gareth Jenkins, Anne Chambers and Ms Thomas, and (ii) my understanding of their roles in relation to providing evidence for court proceedings (and any concerns I may have had in this regard).
  - a. Gareth Jenkins: I had a limited working relationship with Mr Jenkins. I received internal ARQ data extraction requests from Fujitsu staff, including Mr Jenkins, which I would process in accordance with the set procedure outlined in FUJ00152221. These were internal Fujitsu requests which were raised either

via the Peak system or email, and were separate from the ARQ requests from POL. An example of an internal request is FUJ00229905, which I explain in more detail in paragraph 24 of this statement. During my time in the CSPOA Security Team, I knew that Mr Jenkins would provide evidence in court proceedings, but as to what that evidence was, I did not know.

- b. Anne Chambers: Mrs Chambers worked in the Software Support Centre (“SSC”). My working relationship with Mrs Chambers related to calls that CSPOA Security Team would raise for reconciliation, which the SSC would action. I would interact with Mrs Chambers if I raised a reconciliation call that was assigned to her. I do not know what role Mrs Chambers had in relation to providing evidence in court proceedings.
- c. Penelope Thomas: As noted above, Ms Thomas worked in the CSPOA Security Team. Like my role, Ms Thomas’ role involved processing ARQ requests that were received from POL. Ms Thomas had more experience and knowledge in relation to ARQ requests than other members of the CSPOA Security Team, and I had a dotted reporting line into Ms Thomas in that I would approach her whenever I needed clarification or guidance in relation to an ARQ request. Over time, my level of interaction with Ms Thomas changed as the CSPOA Security Team took on more work and I became involved in additional tasks as I explain in paragraph 7 above, but I would always go to Ms Thomas for guidance if there was anything I did not understand about an ARQ request. My understanding was that the data Ms Thomas extracted from the Audit workstations in response to ARQ requests was used as evidence in court proceedings, together with a

witness statement from her. Other than witnessing Ms Thomas sign her witness statements from time to time, which I explain below at paragraph 20, I was not involved in the process of providing evidence for court proceedings.

### **LITIGATION SUPPORT**

16. The Inquiry has asked for my understanding of the agreement between POL and Fujitsu in relation to the provision of litigation support by Fujitsu to POL and the details of any changes to the agreement over time.
17. As part of litigation support provided by Fujitsu to POL, there was an agreement between Fujitsu and POL that placed a limit on the number of ARQ requests that POL could make per year, which did increase over time. I do not remember what the limits were or what charges applied if POL went over them as these matters were not part of my job remit. I do recall, however, that we would log POL's ARQ requests into a database, which would show how many ARQ requests POL had made to date.
18. The Inquiry has requested a detailed explanation of the different types of evidence or information provided by Fujitsu to support litigation in which POL was involved, including the relevant procedures and any changes to the arrangements over time. Fujitsu provided the following types of evidence and information to POL as part of the litigation support service:
  - a. Witness statements: I was not involved in providing witness statements, but I understand that Fujitsu provided a statement which noted that (i) certain

members of the team were authorised to extract data from the Audit workstations, (ii) the data they had extracted had not been manipulated in any way, and (iii) the internal processes for extracting the data had been followed.

b. Helpdesk call logs: I was not involved in providing Helpdesk call logs to POL. These requests were handled by Mr Dunks.

c. Transaction logs and event logs: This was the audit data extracted for ARQs. Transaction logs contained transactions that had taken place over the counter. To obtain transaction logs, I followed the set procedure to extract the data from the Audit workstation. I do not recall what event logs are, but I recall they were provided by Fujitsu to POL as part of litigation support.

19. The Inquiry has asked me to describe my involvement with individuals in POL in relation to the provision of litigation support. My involvement with individuals in POL was to process its ARQ data extraction requests, and to advise on when the data would be sent back to POL. I cannot recall the names of the contacts I had at POL.

20. The Inquiry has asked what I understood my role and Ms Thomas' role to be in relation to witness statements, with reference to FUJ00123054, which is a witness statement signed by Ms Thomas dated 14 October 2010 that I witnessed. In relation to witness statements, Ms Thomas' role was to extract the data that POL had requested via the ARQ request and prepare a witness statement in relation to that ARQ request. When asked, I would witness Ms Thomas signing her witness statement.



21. With reference to FUJ00123054, the Inquiry has asked (i) to what extent witness statements were 'generic' or fact specific, (ii) whether I read or discussed the contents of witness statements that I witnessed, (iii) any concerns I had about the contents of witness statements, (iv) any communications I had with Ms Thomas in relation to the accuracy of witness statements, and (v) any concerns Ms Thomas may have had regarding her role as a witness in court proceedings. I understood that witness statements were fact specific based upon what POL had requested. To witness Ms Thomas signing her witness statement, I was not expected to read the contents of the witness statement. I cannot now recall having discussions or concerns about the contents of a witness statement that I witnessed. I did not have any discussions with Ms Thomas in relation to the accuracy of witness statements nor any concerns she had about her role as a witness in court proceedings.

### **ISSUES RELATING TO AUDIT DATA AND BUGS, ERRORS AND DEFECTS**

22. The Inquiry has asked me to set out my recollection of any issues affecting the integrity of the audit data provided by Fujitsu in respect of litigation conducted by POL, including (i) the identification of any specific issues I was aware of, (ii) whether and how those issues were resolved, (iii) my views as to the adequacy of any resolution, and (iv) any concerns I may have in relation to the issue.
23. I cannot now recall any specific issues relating to the integrity of audit data, however, I have reviewed the documents provided to me by the Inquiry and I can see that I was made aware of issues relating to the duplication of transaction records in an email dated 27 July 2010 (FUJ00172047) and duplicate JSNs (Journal Sequence

Numbers) in transaction records in an email dated 12 November 2010 (FUJ00228770). I would not have been involved in identifying and resolving such issues as this would have been dealt with by more senior and technical members of POA. I do not have the technical background or knowledge, both at the time and now, to understand the causes of these issues or how they were resolved.

24. The Inquiry has asked me to set out (i) any other knowledge I had in respect of bugs, errors and defects in Horizon (including Legacy Horizon and Horizon Online), (ii) how I consider they impacted the work I carried out, and (iii) any concerns I may have in respect of their impact on POL's litigation or criminal proceedings in which I played a role. I do not have any specific recollections of bugs, errors or defects in Horizon, however, I would have been aware of them during my time in the CSPOA Security Team. Having reviewed FUJ00229905, which contains an email from Mr Jenkins to myself dated 13 May 2013, I can see that Mr Jenkins asked me to obtain ARQ data to assist him and Mrs Chambers to conduct analysis in relation to a bug on HNG-X. As I explain above in paragraph 15 of this statement, I would receive and action internal requests from Fujitsu staff to extract data for specific branches and date ranges. My role was to process the ARQ requests submitted by Fujitsu staff and I was not involved in identifying or resolving the issues relating to these requests.

25. The Inquiry has asked me to set out any interactions or communications I had with Ms Thomas in respect of (i) the issues affecting the integrity of the audit data provided by Fujitsu in respect of litigation conduct by POL, and (ii) bugs, errors and defects in Horizon (both Legacy Horizon and Horizon Online), including any

concerns that she may have had in respect of her own role. I cannot recall having such interactions or communications with Ms Thomas.

26. There are no other matters that I would like to draw to the attention of the Chair.

**Statement of Truth**

I believe the content of this statement to be true.

Signed:

**GRO**

Dated: 20 December 2023

**INDEX TO THE FIRST WITNESS STATEMENT OF RAJBINDER SANGHA (NÉE BAINS)**

<b>Exhibit No.</b>	<b>Description</b>	<b>Control Number</b>	<b>URN</b>
1.	Email chain last dated 27 September 2010 with subject "Statement"	POINQ0162418F	FUJ00156224
2.	Email chain last dated 28 September 2010 with subject "Statement"	POINQ0231843F	FUJ00225726
3.	Bundle of documents relating to Preston Road branch including witness statement of Ms Thomas	POINQ0129295F	FUJ00123081
4.	Email chain last dated 16 November 2010 with subject "PC0204310 - Duplicate JSN detected"	POINQ0236059F	FUJ00229905
5.	Audit Data Extraction Process, Version 1.1, dated 14 February 2012	POINQ0158415F	FUJ00152221
6.	Bundle of documents relating to Wattville Road branch including witness statement of Ms Thomas	POINQ0129268F	FUJ00123054
7.	Email chain last dated 21 July 2010 with subject "PC0200468 - Duplication of Transaction Records"	POINQ0178228F	FUJ00172047
8.	Email chain last dated 14 May 2013 with subject "Request for ARQ Extract"	POINQ0234924F	FUJ00228770