

Thursday, 18 January 2024

(10.00 am)

GERALD JAMES BARNES (continued)

Questioned by MS PRICE (continued)

MS PRICE: Good morning, sir, can you see and hear us?

SIR WYN WILLIAMS: Yes, thank you very much.

MS PRICE: Please may we continue with Mr Barnes' evidence?

SIR WYN WILLIAMS: Yes.

MS PRICE: Good morning, Mr Barnes. Thank you again for making arrangements to attend this morning to complete your evidence.

The last topic I would like to deal with is the issue addressed in your second statement, the Apex Corner incident. This is an issue which was first brought to your attention by Fujitsu's Legal Team on 14 November 2023; is that right?

A. I thought it was December but you might be right. November/December, yes, yes. I can't remember the exact date. Yes, that sort of time, yes.

Q. In your statement at paragraph 9 you say:

"On 14 November 2023 ..."

A. Okay, right.

Q. "... I was informed by members of Fujitsu's legal team that a series of ARQ spreadsheets were provided by Fujitsu to POL in response to an ARQ request."

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Q. In response, Fujitsu provided the Post Office with a number of ARQ spreadsheets, including a spreadsheet for March 2008 and, separately, a spreadsheet for April 2008; is that right?

A. That's right, yes.

Q. As a result of comparing the spreadsheets for March and April 2008 with a Giro cheque report, dated 10 April 2008, produced by the postmaster for the appeal, it was discovered, wasn't it, that there were 13 transactions which appeared in the Giro cheque report but did not appear in any of the ARQ spreadsheets produced by Fujitsu; is that a fair summary?

A. That's correct, yes, that's correct.

Q. By way of explanation, you say in your statement you were told that information from relevant PEAKs, a Known Error Log and Operational Correction Requests, showed a number of things. First, the 13 missing transactions, which had taken place in March 2008, had been marooned on the counter at Apex Corner together with a large number of other transactions in 2008, yes?

A. That's correct, yes.

Q. Second, this had been discovered in April 2008 by the Software Support Centre and they had manually reinserted these marooned transactions into the Legacy Horizon correspondence servers, yes?

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Then some information that was provided to you at that time.

A. Right okay.

Q. Is that accurate?

A. Well, if it's written down it must be right. I can't remember the specific date. It's that sort of time, certainly.

Q. If it assists you to have your statement in front of you, the bundle should have that second statement at tab A2.

A. Right, okay, thank you.

Q. You say at paragraph 9 that you were told that the issue related to a series of ARQ spreadsheets provided by Fujitsu to the Post Office, in response to an ARQ request from the Post Office, dated 11 August 2023, relating to the Apex Corner branch. The context for the ARQ request was an ongoing appeal by the former subpostmaster of Apex Corner, which was before the Court of Appeal; is that right?

A. That's right, yes.

Q. In the request, the Post Office had requested transaction data relating to Apex Corner for a number of months, which included the months of March and April 2008; is that right?

A. That's right, yes.

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A. That's correct, yes.

Q. Third, these marooned transactions were reinserted into the correspondence using a virtual counter ID and the use of that virtual counter ID was the reason that the SSC transaction reinsertions had been identified?

A. That's right, yes.

Q. You have been investigating the Apex Corner incident; is that right?

A. That's correct, yes, yes.

Q. Starting please with the first of the pieces of information you were provided with in November 2023, the fact that the transactions were marooned on the counter at Apex Corner in March 2008, can you explain, please, what you mean by this: being marooned on the counter?

A. Well, it's -- this is really not my technical area but, basically, there was some technical problem and the messages weren't copied to the correspondence servers at that time, so that they didn't appear in the audit -- the normal audit data. But it's not really my area, that -- my technical area, that.

Q. To the extent that you can help, how would marooned transactions have appeared to a subpostmaster using the system in branch?

A. I would have thought -- well, I can't be certain but I'd have thought they'd have looked okay, it was only sort

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1 of behind the scenes that you'd have had a problem. But
 2 I can't be certain to that question -- the answer to
 3 that question.

4 **Q.** Coming on to the discovery of the marooned transactions,
 5 is it your understanding that these were discovered by
 6 the Software Support Centre, following a call from the
 7 subpostmaster reporting problems, or can't you say?

8 **A.** I think that's -- yeah, I can't be certain but it sounds
 9 right, sounds right. As I say, it's not really -- that
 10 side of things isn't my technical area but sounds right,
 11 and from what I've heard since.

12 **Q.** Can you help with how the SSC discovered the marooned
 13 transactions when they investigated the matter?

14 **A.** Can't be certain on that point, no. No, no, I can't
 15 really comment on that point.

16 **Q.** Can you help with whether the marooned transactions
 17 would have come to light at all, had the subpostmaster
 18 not called the Software Support Centre?

19 **A.** I can't comment for sure. Sounds like probably not but,
 20 again, not my technical area of expertise, that.

21 **Q.** Your understanding of what they did in April 2008, that
 22 is the Software Support Centre, was to remotely access
 23 the counter in branch using a virtual ID and reinsert
 24 the transactions which had become marooned; is that
 25 right?

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1 used to identify that they had been reinserted by the
 2 SSC)."

3 **A.** Ah, yes, that's right. They didn't exist at that branch
 4 but I'm saying, in general, with multi-counter offices,
 5 you could have had such a high counter number but at
 6 that branch there wouldn't have been. Yes, that's
 7 correct, yes.

8 **Q.** Is it right that, had the subpostmaster in this case not
 9 had a Giro cheque report showing the 13 missing
 10 transactions, the inaccuracy of the ARQ data produced to
 11 the appeal court would not have come to light?

12 **A.** I think that's highly likely. I mean, it was
 13 a completely new issue to me, I'd never come across this
 14 before. So it was a completely new issue to me. So
 15 I would say what you say is correct, yes.

16 **Q.** Before we come to your investigation of why the
 17 reinserted transactions were not retrieved by the ARQ
 18 process applied in 2023, I would like to ask you,
 19 please, about a discrete aspect of the Horizon Online
 20 ARQ process. There is a suggestion at paragraph 17 of
 21 your statement, that second statement in front of you,
 22 that, once an ARQ spreadsheet had been produced using
 23 audit work stations, Fujitsu's Security Team would do
 24 an extra step.

25 Can we have that paragraph on screen, please. It's

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1 **A.** That's right, now that bit I do understand. That's
 2 correct. That's what they did, yes, yes. Now, I'm
 3 understanding again, yes.

4 **Q.** Setting aside the technical explanation for Fujitsu's
 5 production of incomplete ARQ data, in simple terms, is
 6 it right that it was the remote reinsertion of
 7 transactions a month after they were actually done that
 8 caused a problem?

9 **A.** That's right exactly. The key thing here is it was
 10 a month afterwards. If they'd done it very quickly,
 11 there wouldn't have been a problem with the audit system
 12 but because it was a month afterwards, there was.

13 **Q.** Is it right that the SSC's actions in this regard was
 14 only ascertained because of the presence of the virtual
 15 counter ID?

16 **A.** Well, that -- that was certainly an indicator, though
 17 the virtual -- though you see -- you can have counter --
 18 offices with 20 counters, so you'd need a bit more
 19 knowledge than that but it was an unusually high
 20 counter -- they add ten to the normal counter number,
 21 I believe, as I understand it.

22 **Q.** You say at paragraph 9.3 of your statement:
 23 "These marooned transactions were reinserted into
 24 the correspondence using a virtual counter ID
 25 (ie a counter that did not exist at the branch which was

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1 page 10 of WITN09870200. You say:

2 "My understanding is that the Security Team would
 3 identify gaps and duplicates in messages through
 4 automatic checks, and occasionally identify that whole
 5 days of messages were missing at the end of an ARQ
 6 spreadsheet following a manual review of the
 7 spreadsheet. This would sometimes be drawn to my
 8 attention by the Security Team, who would ask me to
 9 investigate the gaps and find the missing messages by
 10 extending the retrieval range of the ARQ while keeping
 11 the filter range the same."

12 Are you saying here that ARQ spreadsheets produced
 13 by the ARQ process were and are checked for completeness
 14 before they're signed off? Is that what you're saying
 15 here.

16 **A.** Well, there's two aspects for this. First of all,
 17 automatically, gaps in the message run and duplicates in
 18 the message run are performed by the software and, when
 19 the spreadsheet is produced, there's a summary table
 20 which states whether there are any gaps or duplicates.
 21 However -- so that identifies most of the problems but,
 22 obviously with gaps, if you get top the end of the
 23 range, well, you can't really be certain because there's
 24 nothing beyond it, as it were. So it's really up to the
 25 operator, if he sees a whole day missing at the end of

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1 the range, then he knows something is wrong.
 2 So that -- so that would be drawn to my attention
 3 sometimes and the answer then, almost always, was to add
 4 a few extra days to the retrieval range because the
 5 relevant transactions were gathered slightly late so
 6 that was almost always the answer.

7 So it's automatic checking of the gaps, plus,
 8 because the automatic gap checking can't check at the
 9 very end of the range, manually checking to make sure
 10 there are not whole days missing at the very end, if
 11 that makes sense.

12 **Q.** So if the Security Team considered messages were
 13 missing, they'd contact you, is that what you're saying?

14 **A.** Yes, that's -- well, sometimes they might take their own
 15 initiative and add an -- initiative and add a few extra
 16 days, I suppose, but sometimes they would contact me and
 17 I'd go down and have a look and, as I say, I would
 18 investigate and very often say "Ah, yes, these files
 19 were gathered late, you just need to add a few extra
 20 days to your retrieval range".

21 **Q.** Just to explain what you mean by that: is that rerunning
 22 the retrieval request with a wider date range?

23 **A.** Exactly. Exactly, yes, exactly.

24 **Q.** You're not talking, then, about manually inserting
 25 transactions?

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1 a month after they were, in fact, conducted.
 2 **A.** *(The witness nodded)*
 3 **Q.** When the Apex Corner ARQ request was processed, the data
 4 was filtered to retrieve (i) transactions with
 5 a March 2008 transaction date, from the file sealed in
 6 March 2008 --

7 **A.** *(The witness nodded)*

8 **Q.** -- and (ii), transactions with an April 2008 transaction
 9 date from the file sealed in April 2008.

10 **A.** *(The witness nodded)*.

11 **Q.** What were not sought were transactions with a March 2008
 12 transaction date from the file sealed in April 2008 and,
 13 therefore, the 13 missing transactions were not
 14 retrieved.

15 **A.** Exactly. That was the problem, yes.

16 **Q.** In the course of your investigation, you applied
 17 a revised query for March 2008 transactions from files
 18 sealed in April 2008; is that right?

19 **A.** That's right, yes.

20 **Q.** Could we have on screen, please, paragraph 20 of
 21 Mr Barnes's statement that's page 11 of WITN09870200.
 22 You say this:

23 "Once this revised query was applied, the 13 missing
 24 transactions were retrieved and presented on an ARQ
 25 spreadsheet and the automatic checks noted at 16(c)

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1 **A.** No, no, no. This is simply the missing transactions
 2 were just gathered late so you just need to -- always we
 3 had an extra three days, I think it is -- or there's
 4 a configurable number of days that you can add to the
 5 retrieval range, we just make it a bit long -- a bit
 6 bigger and that can cater for most issues.

7 **Q.** Coming, then, to your findings as to the technical cause
 8 of the incomplete ARQ data being produced by Fujitsu,
 9 taking it as simply as possible -- and please correct me
 10 if, at any stage, I fall into error -- is it right that
 11 under the old Legacy Horizon ARQ process, transactions
 12 sent from the counter to the audit archive were given
 13 a transaction date as well as a sealed date on which the
 14 file containing them was added to the audit archive?

15 **A.** That's right, yes.

16 **Q.** But --

17 **A.** It just disappeared from my screen.

18 **Q.** That's fine, you don't need that document at this stage.
 19 If there's anything you'd like to see, your second
 20 statement, which you have in front of you, may assist.

21 The 13 missing transactions, which had transaction
 22 dates in March 2008, were not sealed in files in the
 23 audit archive until April 2008 --

24 **A.** *(The witness nodded)*

25 **Q.** -- because they were marooned and then reinserted by SSC

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1 identified gaps in the messages that had been reinserted
 2 by the SSC on the virtual counter. At this stage, I am
 3 not sure why there were gaps in relation to these
 4 messages and the investigation is ongoing in this
 5 regard."

6 Can you explain what you mean by "gaps in the
 7 messages", which had been reinserted --

8 **A.** Right, well, after all the files are retrieved, each
 9 message has a number and they're all sequential. So
 10 always the software automatically checks that there are
 11 no gaps, so that you can be sure that nothing's been
 12 missed out. But for these special inserted
 13 transactions, there were gaps.

14 Now, normally gaps is practically unheard of, it
 15 just doesn't happen. We check for it all the time and
 16 it never happens, but they were happening for these
 17 inserted transactions by the SSC. Not too sure why that
 18 was. But I suppose because they were done in a slightly
 19 unusual way because of the manual insertion.

20 So normally gaps is unheard of, really. It just
 21 doesn't -- well, we always check for it but it is very,
 22 very rarely reported and always a thorough investigation
 23 occurs when there are gaps found.

24 **Q.** Does this mean, on the face of it, that the SSC did not
 25 reinsert the transactions accurately?

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1 A. Well, I don't know the answer, really. It just don't
 2 know, I don't know quite the answer there. So I can't
 3 be certain on that point.

4 Q. You say that "the investigation is ongoing in this
 5 regard". It may follow from your last answer but do you
 6 have any update in relation to either your investigation
 7 or that of others?

8 A. No, we're looking at another aspect, actually, at the
 9 moment, we're concentrating on that but, yes, I could
 10 get back -- I could have another look at that point but
 11 I haven't found anything myself further. I was hoping
 12 someone else might have commented on it.

13 Q. Turning then to the extent and impact of the ARQ
 14 extraction issue, you deal with this over the page at
 15 paragraph 21. Could we go to that paragraph, please.
 16 You say this:

17 "Based on the investigation so far, in general
 18 terms, my understanding is that the ARQ extraction issue
 19 can occur in the following circumstances:

20 "a. There is delay between (i) the date that
 21 a transaction was carried out at a branch, and (ii) the
 22 date that the TMS file containing the transaction was
 23 sealed in the audit archive;

24 "b. The delay is caused by error or fault
 25 (eg counter hardware failures, a fault with the sealer,

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1 modifying the process to allow three months in the
 2 retrieval range (ie the date range applied to retrieve
 3 TMS files). Hence it will retrieve other to 2 months of
 4 lately sealed or inserted messages."

5 You say at paragraph 23 that you are working with
 6 other technical and operational staff in the POA to
 7 understand the extent and impact of the ARQ extraction
 8 issue, including in relation to Legacy Horizon and
 9 Horizon Online.

10 First of all, what steps had been taken to
 11 investigate this?

12 A. Well, what we're doing at the moment, we're
 13 concentrating on the Legacy Horizon, but what we're
 14 going to do is -- a colleague of mine is writing some
 15 software to do this -- is we're going to extract every
 16 month of the cluster files and search them for any cases
 17 where there's a transaction in them, which is in the
 18 following month, or any higher month, that is, and
 19 produce a report, and that's -- so we'll see how common
 20 it is. So that's what we're doing right at the moment.
 21 That's what we're concentrating on.

22 Q. Do you have any update or findings which you're able to
 23 tell us about today?

24 A. My colleague, I read an email from him saying he's got
 25 some test results to be looked at but, unfortunately,

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1 never connectivity problems), which leads to transaction
 2 messages that took place in month 'A' being stored in
 3 the out archive in TMS files that are sealed in month
 4 'B' (eg in the Apex Corner incident, the SSC reinserted
 5 the 13 missing transactions (and others) using a virtual
 6 counter ID);

7 "c. An ARQ request is received requesting data for
 8 the branch including in relation to month 'A';

9 "d. The current Horizon Online ARQ process is
 10 followed to respond to the ARQ request, and the sealed
 11 TMS files relating to the branch for month 'B' are not
 12 searched for transactions that took place in month 'A';
 13 and

14 "e. The automatic checks, noted at paragraph 16(c)
 15 above, failed to identify any gaps in the transaction
 16 messages that would indicate the transaction is
 17 missing."

18 You then say this at 22:

19 "The Apex Corner incident has shown that the current
 20 Horizon Online ARQ process has a flaw because
 21 transactions in Legacy Horizon for one month can be
 22 stored in the audit archive in the following month, such
 23 that the additional days allowed in the retrieval range
 24 are not enough to capture all the relevant TMS files
 25 that were sealed late. As a result, Fujitsu is

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1 like yesterday, I was concentrating on my statements but
 2 I shall be looking at that this afternoon, when I get
 3 back.

4 **MS PRICE:** Sir, those are all the questions I have for
 5 Mr Barnes. I think there are some questions from Core
 6 Participants but before I turn to them, do you have any
 7 questions?

8 **SIR WYN WILLIAMS:** Well, what I'd just like to know, just so
 9 there is no possibility of crossed wires, this last
 10 topic that you've been covering arose in the context of
 11 an appeal to the Court of Appeal, as I understand it.
 12 Does either Mr Barnes or does the Inquiry know whether
 13 that appeal has been determined?

14 **A.** I know it was because of an appeal. I don't know the
 15 answer to that. Our Fujitsu Legal Team would probably
 16 know but --

17 **SIR WYN WILLIAMS:** You don't know.

18 **A.** Not personally.

19 **SIR WYN WILLIAMS:** Do we know, Ms Price?

20 **MS PRICE:** Sir, I'm told that it hasn't by those who
 21 represent the Post Office.

22 **SIR WYN WILLIAMS:** Right. Well, then I think, if there is
 23 an ongoing appeal, we all need to tread a little
 24 carefully, so I need to give some thought to how much
 25 further the Inquiry should delve into this, prior to

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1 a determination by the Court of Appeal.
 2 That's a rather longer winded way of saying,
 3 Mr Barnes, that the Inquiry will contact you rather than
 4 you contact the Inquiry, if we need any further
 5 information about this aspect of your evidence, just so
 6 I can be careful not to interfere in any way in the
 7 processes of an ongoing appeal.
 8 **MS PRICE:** Thank you, sir. Shall I turn to Core
 9 Participants?
 10 **SIR WYN WILLIAMS:** Yes, please.
 11 **MS PRICE:** Ms Page has some questions, sir.
 12 **SIR WYN WILLIAMS:** Yes.
 13 **Questioned by MS PAGE**
 14 **MS PAGE:** Mr Barnes, my name is Flora Page and I act for
 15 a group of subpostmasters.
 16 Could we have please a document up, it's
 17 FUJ00189289. I hope this document is one you've had
 18 a chance to look at. It's only very recently been given
 19 to you. Have you had a chance to see this, Mr Barnes?
 20 **A.** Possibly. I think I might need to ...
 21 **Q.** Perhaps we could zoom in a little bit on the lower half
 22 of the page, from the heading that says, "EOD and
 23 migration".
 24 **A.** Yes, I read a lot of extra material. I don't quite
 25 remember this one but, anyway, you're welcome to ask me

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1 **A.** Well, that's the idea. If something is wrong, it's far
 2 better just to stop than sort of keep going and report
 3 the error, then hopefully it can be fixed and then you
 4 can produce correct results. Yes, that's the idea, yes,
 5 certainly.
 6 **Q.** What we seem to have here, when we go down a little bit,
 7 is, just stopping at the paragraph that starts "Hmmm":
 8 "Hmmm. In the last year or so, SSC have developed
 9 a tool (which did go through LST testing) which will
 10 insert EOD messages for a branch. This is normally used
 11 when a branch has closed down and the kit removed before
 12 EOD ..."
 13 That's end of day, yes?
 14 **A.** Yes, that's right, yes.
 15 **Q.** "... on the last day of trading -- so there are messages
 16 on the [correspondence] server which will never be
 17 harvested unless we take the necessary action. The tool
 18 writes the necessary messages on the [correspondence]
 19 server -- hence there may be [ends of days] on nodes
 20 other than 1."
 21 It then says:
 22 "We have also used the same tool very occasionally
 23 on branches which aren't closed but where, for example,
 24 one counter has been down for over a week resulting in
 25 none of the transactions for the branch being harvested,

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1 a question about it. I'll do my best to answer.
 2 **Q.** Well, the first question which will tell me whether we
 3 need to ask any more, really, is whether MigrationPrep
 4 is the migration software that you said that you were
 5 primarily involved with?
 6 **A.** Oh, I think -- yes, I think that was a different bit of
 7 software. That was -- yes, ooh, it's a long time ago.
 8 There was some counter software where you press a button
 9 to do of the migration, which I definitely remember
 10 writing. I think, yes, I think I did write the
 11 MigrationPrep too, but I might have got that wrong.
 12 Yes, it was an end-of-day process, yes, right? I think
 13 so, but ...
 14 **Q.** The reason I ask is because what we see described here
 15 is MigrationPrep failing in the way that perhaps you say
 16 software should fail, in other words it's very apparent
 17 when it encounters a problem, it just sort of falls
 18 over, I think. We see that the reason it has fallen
 19 over, when this sort of problem is described, is because
 20 SSC messages which were inserted remotely seem to have
 21 interfered in some way and caused MigrationPrep to fail.
 22 Does that make sense?
 23 **A.** Makes sense, yes. Makes sense.
 24 **Q.** So that might be an example of what you describe as sort
 25 of good error handling; is that right?

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1 and there are continuing problems trying to replace the
 2 box", and they give a number.
 3 Then they also talk about, in the final sentence:
 4 "Or ... where kit was removed for a 2 week
 5 refurbishment without writing a [full end of day]."
 6 So it looks like what's happened is that those
 7 messages which are inserted following hardware failures
 8 or following a branch closing have caused MigrationPrep
 9 or the migration process to fail.
 10 **A.** Right okay, yes.
 11 **Q.** Is there really any way of knowing how often these
 12 inserted messages caused other processes to fail
 13 silently?
 14 **A.** Not really, I suppose. No, I suppose not. I suppose
 15 not, is the answer. Not for certain.
 16 **MS PAGE:** Thank you, Mr Barnes. Those are my questions for
 17 you.
 18 **SIR WYN WILLIAMS:** Is that it?
 19 **MS PRICE:** Sir, those are the Core Participant questions,
 20 yes.
 21 **SIR WYN WILLIAMS:** Thank you for returning today, Mr Barnes,
 22 and for answering further questions. As I've said,
 23 I don't expect you to provide any more information to
 24 the Inquiry unless we specifically ask you to do so, all
 25 right?

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1 **THE WITNESS:** Okay, thank you.
 2 **SIR WYN WILLIAMS:** Right.
 3 Where do we go now, Ms Price?
 4 **MS PRICE:** Sir, if we can take a five-minute break to enable
 5 the next witness to come into the hearing room, we have
 6 Mr Sewell next.
 7 **SIR WYN WILLIAMS:** Fine. So I will remain where I am, so to
 8 speak, but just turn off my video for a few minutes.
 9 **MS PRICE:** Yes, sir, just after 10.35. Thank you.
 10 (10.32 am)

11 (A short break)

12 (10.38 am)
 13 **MR BLAKE:** Good morning, sir.
 14 **SIR WYN WILLIAMS:** Good morning, Mr Blake.
 15 **MR BLAKE:** The next witness is Mr Sewell.
 16 **SIR WYN WILLIAMS:** Yes.

17 **PETER JAMES SEWELL (sworn)**

18 **Questioned by MR BLAKE**

19 **MR BLAKE:** Thank you very much. Can you give your full
 20 name, please?
 21 **A.** Peter James Sewell.
 22 **Q.** Mr Sewell, you should have in front of you a witness
 23 statement. I think it's either at the front of that
 24 file or behind the first tab.
 25 **A.** Yes.

21

1 **Q.** So a managed a group of technical people?
 2 **A.** I did, sir, yes.
 3 **Q.** In 2002, you joined the POA Security Team, that's the
 4 Post Office Account Security Team?
 5 **A.** Yes.
 6 **Q.** Then in 2007 you became Operations Team Manager in that
 7 team; is that right?
 8 **A.** Yes, that's right.
 9 **Q.** Briefly, what did the Operations Team Manager role
 10 involve?
 11 **A.** It really managed the team of three or four people in
 12 the Security Team, who carried out various security
 13 processes and functions.
 14 **Q.** You say three or four. Are you able to assist us with
 15 their names?
 16 **A.** Andy Dunks, Neneh Lowther, Bill Membery and Penny
 17 Thomas.
 18 **Q.** We're also going to hear from Ms Munro later today. Can
 19 you assist us with where you fit in with that line
 20 settlement?
 21 **A.** I don't. I left ICL/Fujitsu before Donna took over my
 22 role.
 23 **Q.** So she took over your role?
 24 **A.** I believe so.
 25 **Q.** Thank you. We're going to see the name Brian Pinder as

23

1 **Q.** It has a unique reference number of WITN09710100. Is
 2 that dated 8 September 2023?
 3 **A.** Yes, sir.
 4 **Q.** Could I ask you to have a look at the final page or the
 5 final substantive page, that's page 12. Is that your
 6 signature?
 7 **A.** It is.
 8 **Q.** Thank you. Can you confirm that that statement is true
 9 to the best of your knowledge and belief?
 10 **A.** Yes, it is.
 11 **Q.** Thank you very much. That statement will go into
 12 evidence and will be published on the Inquiry's website
 13 in due course.
 14 I'd like to start with a bit of your background.
 15 I think you joined what was then ICL in 1997; is that
 16 correct?
 17 **A.** Yes, '97.
 18 **Q.** We've heard quite a lot of evidence about the rollout of
 19 Horizon. Were you involved in the rollout of Horizon?
 20 **A.** Only in the positions that I've stated in my --
 21 **Q.** Typically, say in the year 2000, then: what kind of
 22 involvement would you have had with the Horizon system?
 23 **A.** I was probably manager of a developed team, that area.
 24 **Q.** So you were on the technical side?
 25 **A.** No, I was the manager. Not the technical --

22

1 well. Can you assist us with where he fit into things?
 2 **A.** Brian Pinder was my manager -- he was the Security
 3 Manager -- one of the managers while I was in the
 4 Security Team.
 5 **Q.** Thank you. The first document we're going to look at is
 6 FUJ00122151. This is a document from 7 December 2005,
 7 so it pre-dates your time as Operations Team Manager.
 8 **A.** Yes.
 9 **Q.** This time, then, were you just a member of that team?
 10 **A.** Yes, I was doing various tasks for the manager, and
 11 there were several managers.
 12 **Q.** Were you a more senior member of the team?
 13 **A.** I guess so, yes. More of a project manager.
 14 **Q.** Thank you. It's an email from Penny Thomas to yourself
 15 and others in the team. The subject is "Witness
 16 Statement Review"; attachments, "Penny's standard
 17 template [December 2005]"; and she says:
 18 "Please find attached a copy of my initial mark up
 19 of my witness statement, which I will send to Graham
 20 Ward this morning."
 21 Can you assist us with what involvement you had with
 22 the standard template that was being circulated?
 23 **A.** Not a great deal. I didn't involve myself with any of
 24 the witness statements at all.
 25 **Q.** Why would she have been sending it to you?

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1 A. I think just out of a standard way of letting someone
 2 see what she's done and I was that person because I was
 3 a manager.
 4 Q. So you were her manager at this time?
 5 A. What date was it?
 6 Q. This was 2005?
 7 A. I don't think I was, no.
 8 Q. So we have your name, we have Brian Pinder's name, we
 9 have Neneh Lowther's name --
 10 A. Yes.
 11 Q. -- so only three core recipients --
 12 A. Yes.
 13 Q. -- and you're saying it's just for information?
 14 A. Well, information, as far as I can see. That was pretty
 15 much the Security Team, yes.
 16 Q. Can we please look at the statement that she was
 17 attaching, that's FUJ00122152. This is a template,
 18 we've already seen this a couple of days ago. If we
 19 perhaps turn to page 4, this is a slightly different
 20 version to the one we saw with an earlier witness. It
 21 has the following form of words. About halfway down the
 22 page, it says as follows:
 23 "I have access to reports that monitor faults,
 24 polling failures, equipment failures and calls for
 25 advice and guidance logged by the Horizon System
 25

1 "Penny
 2 "What about the paragraph that starts 'None of these
 3 faults relate to etc' is this now acceptable to provide
 4 this response once we have examined fault logs."
 5 Her response was:
 6 "I agree. I've scoured it out. I will now send to
 7 Graham Ward."
 8 Can you assist us with the question you're asking
 9 her there?
 10 A. I can't remember. I don't know. That was 2006 -- 2005.
 11 Q. Yes. Perhaps if we could put that middle email side by
 12 side with the document that I've just taken you to,
 13 that's FUJ00122152, please. It's page 4 of that
 14 document. Just to assist you with the words that are in
 15 that middle email, we'll just show you the part of the
 16 statement that that appears to be referring to, that's
 17 FUJ00122152, page 4.
 18 A. Okay.
 19 Q. Thank you. So if we see there on the right-hand side,
 20 it's the second paragraph, the final sentence of that
 21 second paragraph:
 22 "None of these calls relate to faults which would
 23 have had an effect on the integrity of the information
 24 held on the system."
 25 I appreciate it's some time ago but there certainly
 27

1 Helpdesk. During the ..."
 2 Those question marks, did you understand those to be
 3 part of the *pro forma* you would fill in?
 4 A. I think that's the dates that were inserted when
 5 somebody was filling in the witness statement.
 6 Q. "... there were [then X number of calls] from ..."
 7 Then that's the place to insert the branch details,
 8 is it?
 9 A. Yes, it looks like it to me.
 10 Q. "... to the Helpdesk. None of these calls relate to
 11 faults which would have had an effect on the integrity
 12 of the information held on the system."
 13 If we scroll down this statement, over to page 7,
 14 please. Page 7, there's another standard form of words
 15 that we have looked at already this week, which is as
 16 follows:
 17 "There is no reason to believe that the information
 18 in this statement is inaccurate because of the improper
 19 use of the computer. To the best of my knowledge and
 20 belief at all material times the computer was operating
 21 properly, or if not, any respect in which it was not
 22 operating properly, or was out of operation was not such
 23 as to effect [*sic*] the information held on it."
 24 Can we now go to FUJ00122153. This is an email from
 25 you to Penny Thomas in the middle email. It says:
 26

1 seems to have been some discussion at this time about
 2 the use of that sentence.
 3 A. I think -- I don't really remember it but I guess
 4 I picked that out and thought "Is that right to say
 5 that?"
 6 Q. The question -- I mean, are you able to interpret your
 7 own words there, what you may mean by "Is this now
 8 acceptable to provide this response?"
 9 A. I think -- I don't like the way it was written and
 10 that was it.
 11 Q. Can we please now look at FUJ00122154. Thank you.
 12 If we turn to page 4, we can see -- you'll recall we
 13 just looked at Penny Thomas' email where she says she's
 14 removed it.
 15 A. Right.
 16 Q. If we turn to page 4, we can see that form of words has
 17 been removed from this *pro forma*. Can you see there
 18 it's the second paragraph.
 19 A. Yes.
 20 Q. Can we now, please, look at FUJ00122189. This is
 21 an email of 22 March 2006, so you're not yet Team Leader
 22 or Manager of the team. It's an email you're copied in
 23 to -- thank you -- and it's from Brian Pinder to Andy
 24 Dunks, copied to you. The subject is "Gaerwen Witness
 25 Statement", and it's attaching another witness statement
 28

1 with the title "Lordship Lane [22 July 2005]".
 2 **A.** Right.
 3 **Q.** It says:
 4 "Andy
 5 "This is the statement template which you need to
 6 use. Fill it in with details from the calls and amend
 7 the details highlighted in yellow.
 8 "Please return to me tomorrow, when completed as
 9 I would like to see it before we send it off to Graham.
 10 "Many thanks for your help with this and I will
 11 amend/note this on your appraisal going forwarded.
 12 "Any help always ask me or Peter but meanwhile
 13 I will have a chat with Mik Peach on this too.
 14 "Once again thanks.
 15 "Brian."
 16 Just looking at the words there about the noting on
 17 the appraisal, was provision of a witness statement for
 18 use in proceedings seen as, in some way, doing a favour
 19 for the company or something that would result in
 20 positive feedback from superiors?
 21 **A.** I don't think so. I thought it was a standard support
 22 to the prosecution --
 23 **Q.** Was it part of, for example, Andy Dunks' contract or
 24 standard working practice, as far as you were aware.
 25 **A.** No, I think it was delegation. I don't think it was.

29

1 **A.** No, not me. No. Somebody has obviously changed the
 2 wording to fit the thing and decided that's the better
 3 way of doing it. Not for me, no.
 4 **Q.** In fact, I think this statement, if we go by the date
 5 that is provided on the attachment, it says Lordship
 6 Lane, 22 July 2005. So this version may, in fact,
 7 pre-date the Penny Thomas version?
 8 **A.** It might do, yeah.
 9 **Q.** But is that something that would have caused you any
 10 concern at the time?
 11 **A.** Not me. I wasn't involved in witness statements, no.
 12 **Q.** I mean, you were sufficiently involved to have sent that
 13 email querying the form of words earlier?
 14 **A.** I obviously must have been, yeah.
 15 **Q.** So, presumably, you did read these --
 16 **A.** I obviously read that one, yeah.
 17 **Q.** Can we now please look at FUJ00122197. We're going to
 18 start at page 5, bottom of page 5 into page 6, please.
 19 This is a chain of emails. We're going to see, in due
 20 course, you become copied in to the emails.
 21 **A.** Right.
 22 **Q.** It's not clear at all from this email who the recipients
 23 were, it just seems to go to Fujitsu. Do you recall who
 24 Graham Ward was?
 25 **A.** Graham Ward was a Case Manager for the Post Office.

31

1 **Q.** Can you assist us at all with why it might have been
 2 seen that something like this would have been worthy of
 3 noting on an appraisal going forward?
 4 **A.** No, it's Brian that's written that. I don't know what
 5 he means. He's obviously happy that Andy could help him
 6 out with it.
 7 **Q.** Can we please look at FUJ00122190. This is the
 8 statement that was attached to that email, so it's the
 9 Lordship Lane statement that was sent to Andy Dunks. If
 10 we look at that on the first page, we can see there's
 11 reference to Lordship Lane in the second paragraph.
 12 **A.** Right.
 13 **Q.** Then that form of words that we saw originally taken out
 14 of Penny Thomas' statement still appears in this
 15 statement that was circulated in 2006. So you can see
 16 there it says:
 17 "I am of the opinion that none of these calls relate
 18 to faults which would have had an affect on the
 19 integrity of the information held on the system."
 20 There's a slight change to the Penny Thomas version,
 21 the Penny Thomas version said, "None of these calls
 22 relate to faults". Now, this version seems to read
 23 "I am of the opinion that none of these calls relate to
 24 faults".
 25 Is that a form of words that you recall at all?

30

1 **Q.** So he was at the Post Office --
 2 **A.** Yes.
 3 **Q.** -- emailing a team within Fujitsu. Are you able to
 4 assist us with the name in the two --
 5 **A.** He would email Penny Thomas.
 6 **Q.** Penny Thomas.
 7 **A.** Yes.
 8 **Q.** I'm going to read from that email. He says as follows,
 9 he says:
 10 "All ..."
 11 So perhaps it's more than just Penny Thomas.
 12 **A.** I think that's a generalisation, yeah, but maybe Brian
 13 Pinder is there as well, yes.
 14 **Q.** I think we'll see Brian's name. If we go to where it
 15 says "Brian", it says:
 16 "Brian -- in the case of Marine Drive ..."
 17 That's a case that we've heard in this Inquiry,
 18 that's Mr Castleton's branch.
 19 **A.** Right.
 20 **Q.** "... and Torquay Road for which you have previously
 21 provided written responses, I would like to 'sound out'
 22 the possibility of someone at Fujitsu providing a formal
 23 witness statement along the lines of the attachment
 24 below, which was provided by Bill Mitchell in one of our
 25 criminal cases ..."

32

1 Who was Bill Mitchell?

2 **A.** Bill Mitchell was the predecessor manager to Brian
3 Pinder, Security Manager.

4 **Q.** Thank you:

5 "... (whilst Marine Drive and Torquay Road are not
6 criminal matters, given the allegations being made by
7 the postmasters, I'm sure you'll agree that it is very
8 much in both ourselves and Fujitsu's interests to
9 challenge the allegations and provide evidence that the
10 system is not to blame for the losses being reported).
11 Whilst it may not be a statement that you, Penny or
12 Neneh can provide, I'm shore there must be someone who
13 can."

14 Just pausing there, that concern that it's "in both
15 ourselves and Fujitsu's interests" to show that the
16 system is not to blame for losses, was that a concern
17 that you were aware of at that time?

18 **A.** I was not aware of this, no.

19 **Q.** You weren't aware that that was a concern?

20 **A.** Not -- no, I didn't realise that, no.

21 **Q.** Then the paragraph below:

22 "On a separate matter, I also require a witness
23 statement in respect of the following ARQs [and he gives
24 some ARQ numbers], all of which relate to Gaerwen [sub
25 post office]. We need the usual ... covering an
33

1 statement.

2 **Q.** Is that because you were part of quite a small team?

3 **A.** Yes, I think so.

4 **Q.** If we scroll up slightly, thank you very much, you're
5 still copied into this email.

6 **A.** Copied in, yes.

7 **Q.** It's a response from Brian, and he says:

8 "Graham
9 "No problem, we are happy to provide a statement
10 presenting the Helpdesk calls regarding Marine Drive and
11 Torquay Road when required. Grateful if you could
12 provide us with a heads up nearer the time."
13 So that's answering, I think, the second of those
14 questions in that email.

15 **A.** It looks like it, yes.

16 **Q.** Could we please turn to the bottom of page 3 and then to
17 page 4, please.

18 Thank you. So we have here an email from Graham
19 Ward to Brian Pinder and others but you're not copied in
20 at this stage, although I think you did receive the
21 chain and we'll come to look at that. But if we scroll
22 down, please, down to the bottom of page 3.

23 It's the bottom email there. From Graham Ward to
24 Brian Pinder. As I say, you're not a direct recipient
25 of that, although we'll look at the entire chain because
35

1 analysis [and gives a period]."

2 He says:

3 "Penny -- you may recall this one which relates to
4 nil transactions, my previous emails dated 14, 21, and
5 25 October refer."

6 If we scroll up to page 5, please -- thank you very
7 much, we can stop there -- we now have an email from
8 Mr Ward to that Fujitsu general address but now it's
9 copied to you.

10 **A.** Yes.

11 **Q.** It says:

12 "Brian/Penny/Neneh
13 "Can I enquire when the Gaerwen Statement will be
14 ready please (bold paragraph below) ... as it is
15 required for the submission of prosecution committal
16 papers which have to be in by the end of this week ..."

17 **A.** Yeah.

18 **Q.** "Also have you made any progress in deciding whether
19 a similar statement as to the one previously prepared by
20 Bill Mitchell will be possible in the Torquay Road and
21 Marine Drive cases ... if we require one."

22 Can you assist us with why you were copied into that
23 email?

24 **A.** No. I think I was copied in to a lot of things, just to
25 make me aware but, no, it had nothing to do with the
34

1 I think you do possibly appear again. It says as
2 follows:

3 "Brian, I'll get back to you once I have confirmed
4 whether we need these statements or not (in respect of
5 Torquay Road and Marine Drive).
6 "Can I also take this opportunity to clarify our
7 requirements in respect of the Gaerwen statement. In
8 this case the subpostmaster is blaming Horizon for his
9 losses claiming that for various banking related
10 transactions the counter desktop records amounts entered
11 for payment but then shows 'Nil' when the transaction
12 log is printed, and it is this we need to refute."
13 Just pausing there, as at this period, so March
14 2006, were you aware of complaints being made by
15 subpostmasters blaming Horizon for losses?

16 **A.** No, sir.

17 **Q.** You weren't aware of that?

18 **A.** No.

19 **Q.** "Various emails passed between myself and your team on
20 this matter and the reply below was received from Penny
21 on 20/10/05."
22 Then the next paragraph appears to be a quote from
23 an email that had passed between himself and Penny
24 Thomas. It says:
25 "Nil transactions could also be caused by errors in
36

1 PIN Pad, counter, agents or host code depending on what
2 constitutes a 'nil transaction'. This cannot be
3 determined without access to the appropriate system
4 logs."

5 Then he continues:

6 "Penny also sent with the respective ARQ data,
7 additional spreadsheets which showed all 'Nil'
8 transactions for the periods."

9 He says:

10 "We therefore require the usual statement producing
11 the transaction and event logs (Penny has sent me
12 a draft and I have suggested one or two minor
13 amendments). We will also need the above spreadsheets
14 produced by whoever put them together explaining the
15 headings and under what circumstances 'Nil' transactions
16 can occur. Finally, [one or two]", et cetera.

17 The question I have for you is about the words from
18 Graham in the second line, he says, "Penny sent me
19 a draft and I have suggested one or two minor
20 amendments". Was it usual, to your understanding, for
21 somebody in the Post Office Investigations Team to
22 suggest amendments to witness statements?

23 **A.** I can't recall whether that was a true statement or not.

24 I don't know. It's Graham Ward talking to Penny Thomas.

25 **Q.** Yes, but, within your small team, you being copied in to

37

1 witnesses.

2 **A.** Yes.

3 **Q.** If we have a look down the page. It's these two
4 paragraphs:

5 "There is no reason to believe that the information
6 in this statement is inaccurate because of the improper
7 use of the computer. To the best of my knowledge and
8 belief at all material times the computer was operating
9 properly, or if not, any respect in which it was not
10 operating properly, or was out of operation was not such
11 as to effect the information held on it."

12 Did you have any concerns about those words being
13 used in witness statements?

14 **A.** I don't recall anything like that. This is a statement
15 by Gareth Jenkins, not from me.

16 **Q.** No, but you're a member of this small team. You were
17 senior within that team.

18 **A.** Yeah, I didn't involve myself with witness statements.

19 **Q.** Do you now have any concerns about those words?

20 **A.** Today?

21 **Q.** Yes.

22 **A.** Of course.

23 **Q.** Yes. Can we please look at FUJ00122203. We have
24 a response from Gareth Jenkins -- and I accept you're
25 not copied in to this email -- and he says:

39

1 emails about witness statements, you having, we've seen,
2 made some comments on witness statements --

3 **A.** Very minor, very minor.

4 **Q.** -- were you not aware -- one said that you were not
5 aware that subpostmasters were blaming Horizon for
6 losses --

7 **A.** Yeah.

8 **Q.** -- and (2), is it your evidence that you weren't aware
9 that the Post Office Investigators inputted, in some
10 way, on --

11 **A.** I don't know whether they did. I thought that was just
12 advice but I don't know.

13 **Q.** Can we turn to the first page, please, email from Neneh
14 Lowther, so within your team, to Gareth Jenkins.

15 **A.** Yes.

16 **Q.** She says:

17 "Hi Gareth,

18 "I have updated your [witness statement] with all
19 the column headings you explained to me earlier."

20 I'm going to now take you to the witness statement
21 that was attached to this email, and that's FUJ00122198.
22 This was the Gareth Jenkins statement.

23 **A.** Mm-hm.

24 **Q.** If we could scroll down. That statement included
25 a couple of paragraphs that we have seen with previous

38

1 "I've annotated it with revisions.

2 "In particular, I don't feel I can include the last
3 two paras, which may make the statement useless."

4 Do you not recall any discussion within your team
5 about concerns about the accuracy of witness statements
6 being provided?

7 **A.** I don't recall my input into this at all, no.

8 **Q.** Perhaps we can look at FUJ00122201. That's the
9 statement that Mr Jenkins has attached to this email.

10 Thank you.

11 If we scroll down to the end of the statement,
12 please, he's highlighted those two paragraphs at the
13 end. He says at the bottom:

14 "I'm not sure that the yellow bit ..."

15 Now, we've scanned it in black and white but it's
16 those two paragraphs there.

17 **A.** Yeah.

18 **Q.** "... is true. Can this be deleted? All I've done is
19 interpret the data and spreadsheets that you have
20 emailed me."

21 So looking back at what we've already had this
22 morning, we have Penny Thomas removing a definitive
23 statement about system integrity in the *pro forma* that
24 she had been working from. You have Gareth Jenkins here
25 expressing concerns about a paragraph that says that the

40

1 computer system was operating properly. As at 2006, do
 2 you recall there being any concerns within your team
 3 about what they were being asked to do in relation to
 4 the provision of evidence in criminal proceedings?
 5 **A.** I don't recall anything like that. This is what the
 6 part of the job was: to provide a witness statement with
 7 the figures from the ARQ.
 8 **Q.** You don't recall, within that small team, any
 9 discussions about concerns about the reliability of the
 10 evidence being given?
 11 **A.** No.
 12 **Q.** I'm going to move on to a specific issue and it's
 13 an issue that we might refer to as the Craigpark issue
 14 or lock issue.
 15 **A.** Yes.
 16 **Q.** Can we please have a look at FUJ00154823, please. We're
 17 now in August 2008, so by at this time you were
 18 a Manager of the team, or the --
 19 **A.** Yes.
 20 **Q.** Yes. Can you assist us with what management involved?
 21 Were there regular team meetings?
 22 **A.** Team meetings, appraisals, objectives, typical
 23 manager-type roles.
 24 **Q.** How often would the team meetings take place?
 25 **A.** Various, as and when necessary. If there was some sort
 41

1 ..."
 2 Now, "Wednesday window", is that the balancing day?
 3 **A.** No idea.
 4 **Q.** No idea.
 5 "... and two in the 35*52 (weeks) = 1,820 are known
 6 to have caused a discrepancy.
 7 "a) SSC staff spending lots of time monitoring these
 8 events for 1-2 per year is simply not cost effective.
 9 "b) Fixing the underlying problem of holding the
 10 'lock' for too long is feasible ..."
 11 It refers to a PEAK and we're going to that PEAK
 12 shortly.
 13 **A.** Mm-hm.
 14 **Q.** He says:
 15 "... BUT
 16 "c) I would want some assurance that making this
 17 change to the live estate, to resolve 2 reported issues,
 18 is NOT going to have a knock-on effect anywhere else ...
 19 "I know this is a difficult request -- but I don't
 20 like changing Horizon at this stage -- and I would like
 21 to be convinced that it is necessary, and that we won't
 22 make [matters] worse ..."
 23 If we go up, please, to page 3. So summarising
 24 that, Mik Peach seems to not want a fix to Horizon and
 25 is looking at some workarounds.
 43

1 of issue there would be a team meeting, otherwise there
 2 would be a routine -- maybe a monthly meeting.
 3 **Q.** Appraisals, feedback?
 4 **A.** Appraisals would be annually.
 5 **Q.** Was it a team in which people who were in the team felt
 6 able to speak freely about concerns that they had?
 7 **A.** I think so, yes.
 8 **Q.** Let's look at this particular issue. We have here, if
 9 we turn to the final page please, if we start at the
 10 bottom of the email chain, an email from Mik Peach,
 11 11 August 2008. Mik Peach, he was the SSC Manager was
 12 he?
 13 **A.** Yes, he was, yes.
 14 **Q.** This is an email from him to Gareth Jenkins. You're not
 15 on this particular email but you do appear in the chain
 16 and we'll go to that email.
 17 **A.** Mm-hm.
 18 **Q.** He says as follows:
 19 "Gareth,
 20 "OK -- I understand that you don't want this to be
 21 left unfixed ..."
 22 We can see in the subject it's about a particular
 23 problem at a branch, Craigpark branch:
 24 "On the basis of the evidence we have -- there are
 25 35 errors per week (inside the 7-8 pm Wednesday window)
 42

1 **A.** It looks like it, yes.
 2 **Q.** Yes.
 3 **A.** Yes.
 4 **Q.** Gareth Jenkins responds to Mr Peach, and he says:
 5 "Mik,
 6 "As discussed, I am still uneasy about this, but
 7 I agree it's probably safer to leave things as they are.
 8 "I've discussed this with Mike and I'll mention this
 9 to Pete Sewell so he can ensure that if we're providing
 10 evidence for an ARQ that we also check on relevant
 11 events."
 12 Now, your evidence so far has been that you didn't
 13 get involved in witness statements.
 14 **A.** Tried not to, yes.
 15 **Q.** Well, why is Mr Jenkins there seeing you as the relevant
 16 person to go to in respect of providing evidence for
 17 an ARQ?
 18 **A.** I can only assume that's because I was Penny's manager,
 19 Penny Thomas, and Penny Thomas was the ARQ expert.
 20 **Q.** So you managed the person who was providing evidence in
 21 proceedings?
 22 **A.** Yes.
 23 **Q.** If we scroll up, please, we can see that Gareth Jenkins
 24 emails you and he says as follows:
 25 "Pete,
 44

1 "Over the last couple of years we've had a couple of
2 cases where EOD ..."

3 I think that stands for "end of day".

4 **A.** Yes, I believe so.

5 **Q.** "... (which runs at [7.00 pm]) interferes with
6 transactions being written at the counter. If this
7 happens, then there is an Event written to the NT event
8 Log.

9 "Given we only have couple of instances, and a fix
10 is as likely to cause further problems, then we're
11 reluctant to make a change to Horizon. However if
12 Horizon data is being used in evidence for the
13 prosecution of a postmaster, it is probably wise to also
14 check to see if any such events were produced during the
15 period in question, is this something that can/should be
16 built into the ARQ process?"

17 Then if we look up, please, if we go up to the
18 previous page, page 2. We have an email from you,
19 following this up -- is that within your team to Alan
20 Holmes and Penny Thomas?

21 **A.** Yeah, Alan Holmes was the, I guess the design authority
22 for the audit system.

23 **Q.** It says:

24 "Alan

25 "Can we set up a meeting please, Gareth has raised

45

1 "Pete has asked me to send a note to set up
2 a meeting to discuss this issue."

3 Then you ask if everybody can make 14 August and she
4 attaches PEAKs and KELs so the PEAK is the incident log
5 and the KEL is the Known Error Log. Were those things
6 that you were familiar with at that time?

7 **A.** I knew what they were, yes.

8 **Q.** So she is sending around, effectively, information to be
9 discussed at a meeting?

10 **A.** Yeah, these are the three technical people that would
11 have had real relevant input into this.

12 **Q.** Yes, thank you. If we look over to page 4, please,
13 that's the first of the PEAKs that she has attached.
14 Again, it's a PEAK we've seen quite a lot of over the
15 last couple of days, it's PC0152376, and it begins on
16 20 December 2007. So by the time of this discussion
17 in -- I think we're in August now, August 2008, so by
18 August it had been known for eight months, this
19 particular issue?

20 **A.** Yeah.

21 **Q.** Is that right?

22 **A.** Reading this, yes.

23 **Q.** Yes.

24 **A.** Yes.

25 **Q.** Presumably, prosecutions had been going on during this

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1 a potential issue with events which might require
2 a change in our ARQ process."

3 So it seems as though, as at 12 August 2008, you
4 were taking things forward, arranging a meeting about
5 this issue that had been raised by Gareth Jenkins.

6 **A.** That's exactly what that is, I think, yes.

7 **Q.** Yes. Can we please look at FUJ00155232, please. This
8 is an email slightly before you've arranged that
9 meeting. It's a response to Gareth Jenkins and you say
10 as follows:

11 "Gareth

12 "When you say interfere, are transactions actually
13 lost when the [end of day] is run?"

14 Can you assist us with any information you received
15 in that respect? Do you recall this conversation?

16 **A.** No, no. I just don't recall it.

17 **Q.** Do you remember receiving an answer?

18 **A.** No, I don't recall it at all.

19 **Q.** You do seem there to be sufficiently involved that you
20 are --

21 **A.** I think I was, with Craigpark, yeah.

22 **Q.** Yes. Okay. Can we please look at FUJ00155231, please.

23 Thank you. An email from Penny Thomas to Gareth Jenkins
24 and others, including you. It says:

25 "Hi all

46

1 period and other court cases?

2 **A.** I don't recall, I'm not sure.

3 **Q.** Do you recall, for example, a pause in 2007 to August
4 2008 following this issue?

5 **A.** Yes.

6 **Q.** You recall a pause in 2007 or do you recall a pause
7 later?

8 **A.** I recall there was a pause while this was checked out.

9 **Q.** Yes, and that pause presumably followed the August
10 meeting, rather than prior to the August meeting --

11 **A.** I think so, yes.

12 **Q.** -- because you weren't aware of it before --

13 **A.** I think so.

14 **Q.** -- this period?

15 **A.** Yes.

16 **Q.** So are we to understand that, after discovery,
17 20 December 2007, up until the date of this meeting,
18 there hadn't been, from your team at least, any
19 significant impact on the work that was being carried
20 out?

21 **A.** I don't know whether things were being checked at that
22 time or not. I don't recall.

23 **Q.** But, as manager of the team, do you recall any
24 significant change to your practices between December
25 2007 and the date of the meeting in August 2008?

48

1 A. I believe the error on Craigpark was 2007.
 2 Q. Yes. The error was in 2007. You're manager of a team
 3 that provides, for example, witness statements and
 4 prosecutions.
 5 A. Mm-hm.
 6 Q. Do you recall from December 2007, up until the date of
 7 this meeting in August 2008, any significant activity in
 8 relation to this issue?
 9 A. I don't recall. I don't recall.
 10 Q. You don't recall or you don't believe there was any?
 11 A. I don't remember, I don't remember.
 12 Q. If we turn over the page to page 6, please. I won't
 13 spend much time on this PEAK because we have, as I said,
 14 seen it a number of times here but I can just summarise
 15 it for you: the middle of this page gives an indication
 16 of the issue. It says:
 17 "The messages that should have posted the £465.73
 18 gain in stock unit BM to local suspense failed to be
 19 written. Consequently, when local suspense was cleared
 20 (written off to [profit and loss] in this case) the
 21 £465.73 wasn't taken into account and this resulted in
 22 the [minus] £465.73 trading position seen on the branch
 23 trading statement."
 24 So it seems as though the issue is that the
 25 subpostmaster's branch trading statement would show

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1 A. No.
 2 Q. -- that this issue that caused a discrepancy wouldn't be
 3 seen, wouldn't be known to the subpostmaster?
 4 A. I wouldn't know. I don't know.
 5 Q. You wouldn't know?
 6 A. I don't know whether the postmaster was aware of this.
 7 Q. Was that not something that was explained to you at the
 8 time?
 9 A. Explained to me?
 10 Q. Yes. It wasn't explained to you?
 11 A. I don't know. I don't recall it.
 12 Q. You don't recall?
 13 A. No.
 14 Q. I mean, something that affected the balancing of
 15 a subpostmaster, the branch trading statement, the
 16 statement that they would see that would show
 17 a discrepancy, is that not something that would be of
 18 concern to you?
 19 A. If I was involved at this level, yes, I guess so. But
 20 I wasn't.
 21 Q. But you were the manager of a team that provided
 22 evidence in prosecutions of subpostmasters?
 23 A. Yeah, I don't think I recall this at all.
 24 Q. "Not resilient to errors", it suggests that in fact this
 25 is just an example of a problem that the underlying code

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1 a discrepancy as a result of this error.
 2 A. Yes, it would suggest it, yes.
 3 Q. Yes?
 4 A. Yes.
 5 Q. If we go over the page, please, to page 7. We've heard
 6 from Gerald Barnes, there's an entry here that we,
 7 again, as I say, have heard quite a lot about, and he
 8 says as follows, he says:
 9 "The fact that the EPOSS code is not resilient to
 10 errors is endemic. There seems little point fixing it
 11 in this one particular case because there will be many
 12 others to catch you out. For example when I tried to
 13 balance with CABSPProcess running I found that declaring
 14 cash failed with the same sort of error message!"
 15 So the issue being here that there would be
 16 a discrepancy and it wouldn't be showing as an error to
 17 the subpostmaster; is that what you understood the issue
 18 to be?
 19 A. I don't understand this. This is Gerald Barnes.
 20 Q. Yes.
 21 A. He's one of the technical guys in the -- was in the team
 22 of SSC.
 23 Q. He has summarised the issue in lay terms as,
 24 effectively, an error that is silent to the postmaster;
 25 is that something that you were aware of --

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1 could cause, rather than -- the real problem being the
 2 EPOSS code itself. Is that something that was ever
 3 discussed with you?
 4 A. No, no. Too detailed for me.
 5 Q. I mean, during Phase 2 of this Inquiry we heard quite
 6 a lot about the EPOSS code. We heard about Whac-a-Mole
 7 type problems where something would be fixed, something
 8 else would crop up. You were at ICL at the time of the
 9 rollout, was that a kind of issue that you knew anything
 10 about --
 11 A. No.
 12 Q. -- that nobody discussed with you at the time?
 13 A. No.
 14 Q. Can we please turn to page 11. This is the Known Error
 15 Log. If we could scroll down and over to the next page,
 16 please. We see the solution being explained. It says:
 17 "No fix planned for Horizon given the relative
 18 rarity of the problem. However, should the problem
 19 start occurring more often then the need for a fix
 20 should be reviewed. Add any cases to list below."
 21 Then we have a list of cases. There we have three,
 22 by that time, PEAKs that addressed -- so three recorded
 23 incidents that were sufficiently serious enough to
 24 result in an error log --
 25 A. Yes.

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1 Q. -- 12 December 2007; 5 March 2008; 27 December 2007.
 2 Over to the next page, please, we have -- and can
 3 I just be clear, those were just the reported errors
 4 that were sufficient to make it into an error log, is
 5 that -- do you understand PEAKs to be something --
 6 A. No, you're right. Yes, they're the logs.
 7 Q. Over the next page is another PEAK. So this one we're
 8 looking at PC0152421, and perhaps we could go over to
 9 page 15. Here we have Anne Chambers reporting on
 10 21 December 2007 and the second entry in her entry says
 11 as follows:
 12 "The stock unit was being balanced 7.00 pm at night,
 13 and, at the point where the stock unit gain should have
 14 been written to local suspense, there was some
 15 contention with the End of Day processes which were
 16 running in the background, and the messages were not
 17 written."
 18 She says:
 19 "At the branch, the loss for TP8 was £465.73 bigger
 20 than it should have been. The loss (£1,083.76) was
 21 written off to [profit and loss]. As I understand it,
 22 this means the branch is not personally out of pocket,
 23 and there is no need to attempt to correct anything at
 24 the branch. The [branch trading statement] shows
 25 a trading position of [minus] £465.73."

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1 subject to a 10-second timeout, until the lock was
 2 released. The balancing operation attempt to write
 3 messages to the message store but this operation timed
 4 out and the messages were discarded. Due to
 5 a deficiency in the implementation of the counter code
 6 the end user was not informed of the failure and the
 7 transaction (the balancing operation) appeared to
 8 complete successfully."
 9 So, in essence, the subpostmaster wouldn't be aware
 10 of the issue.
 11 A. I don't think so, no.
 12 Q. Yes.
 13 "When this type of error happens riposte records
 14 an event in the event log. It was said that this type
 15 of error could happen with any type of transaction."
 16 He then quotes the words we've already looked at
 17 from Mr Barnes, so the record of the minutes records
 18 that detail. Then it goes on and says, as follows:
 19 "When this error condition occurs, the message is
 20 discarded and no gap is left in the message sequence
 21 numbers. The messages that fail to be written represent
 22 auditable events/transactions and this throws the
 23 credibility of the message sequence number check used to
 24 prove the integrity of data provided to [the Post
 25 Office] under the ARQ service. The question is, should

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1 There is then a meeting held, and I'd like to take
 2 you to a note of the meeting. That's at FUJ00154824.
 3 So the meeting is held on 13 August 2008.
 4 A. Yeah.
 5 Q. Present in the room is Gareth Jenkins, Alan Holmes --
 6 can you assist us, Gareth Jenkins and Alan Holmes, they
 7 were both technical specialists?
 8 A. Yes.
 9 Q. Steve Meek, Steven Meek?
 10 A. He was technical as well.
 11 Q. Then we have Penny Thomas and you join by phone. Is
 12 there a particular reason why you joined by phone?
 13 A. I might have been away somewhere else, another location.
 14 Q. I'm going to read to you a fair bit from these minutes
 15 before we take the mid-morning break. We're going to
 16 start with the second paragraph:
 17 "Gareth Jenkins explained the issue as described in
 18 the PEAKs and KEL listed above."
 19 Those are the documents we've just been looking at:
 20 "An [end of day] process ... was being run between
 21 [7.00 pm and 8.00 pm], and at the same time the user was
 22 performing a balancing process on the gateway PC.
 23 During the [end of day] operation the CABSPProcess
 24 created a 'lock' on the message store during which time
 25 (30 seconds) causing any other message writes to wait,

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1 any of these errant messages have been included in data
 2 returns and under what other circumstances could this
 3 type of failure arise?"
 4 Pausing there, did you see this as a significant
 5 potential issue?
 6 A. Yes. Yes.
 7 Q. It then goes on to say:
 8 "The discussion then focused on the way forwarded.
 9 It was agreed that we needed to understand what types of
 10 transactions had been subject to this error. To do this
 11 we needed to retrieve all of event logs, filter the
 12 Riposte error messages and analyse what was found. Only
 13 event logs from 8 January 2003 have been retained due to
 14 a previous retention agreement with [the Post Office]."
 15 Just stopping there, so because the data was only
 16 retained for a certain number of years, any, for
 17 example, ARQ data from the rollout of Horizon, so 2000
 18 to 2003, by this stage would no longer have been held?
 19 A. Yes, I think that's right.
 20 Q. Yes, and over the page:
 21 "At the same time we needed to consolidate all of
 22 the ARQ outlet and time frame data requests into
 23 a single Excel spreadsheet so that ultimately any
 24 relevant errors found in the event logs above, could be
 25 compared to ARQ data provided to [the Post Office] for

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1 litigation purposes to confirm the text of the data
 2 provided. This exercise can only be carried out from
 3 8 January 2003", for the reasons we've just explained.
 4 **A.** Yes.
 5 **Q.** "We cannot provide any further ARQs until this exercise
 6 is complete as the audit server is being fully utilised
 7 retrieving the 5.5 years worth of event log data."
 8 So at this stage, five and a half years worth of
 9 event log data was being gathered for some sort of
 10 analysis.
 11 **A.** Yes, looks like it, yes.
 12 **Q.** "We must question whether it is advisable to provide
 13 further ARQ data or witness statements until we have
 14 a process in place to fully validate our returns."
 15 So do you remember some concern within the team at
 16 this time about witness statements and data that was
 17 being provided to the Post Office and the reliability of
 18 that data?
 19 **A.** Yes, as a result of this, yes.
 20 **Q.** Yes.
 21 "It was agreed that the process of retrieving all of
 22 the available event logs would be carried out and would
 23 start immediately. A sample would be provided to Steven
 24 to review. Also, the consolidation of the ARQ requests
 25 would commence."

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1 warrant continuing the review at the scale with which it
 2 was being conducted. There are nevertheless some
 3 residual actions that need to be driven forward."
 4 Are we to take it, then, that the significant
 5 exercise that had been planned, the five and a half
 6 years worth of ARQ data, it was decided on the
 7 3 September that there wasn't sufficient evidence to
 8 warrant continuing that kind of a review?
 9 **A.** I don't know. I don't recall that. I don't remember
 10 that.
 11 **Q.** Do you remember five and a half years worth of ARQ data
 12 being pored over for a considerable period?
 13 **A.** That was one of the plans that was coming out of the
 14 remedy but whether it actually happened, I don't
 15 remember.
 16 **Q.** Does this email suggest, in fact, that it didn't happen?
 17 **A.** If that is what that is referring to.
 18 **Q.** Yes. Then there are number of actions for people.
 19 JB somebody called John Burton; is that a name
 20 that's familiar to you?
 21 **A.** The name is familiar, yes.
 22 **Q.** Do you know what his role was?
 23 **A.** No, I don't.
 24 **Q.** "JB to review with Hilary over the extent to which the
 25 programme might need to revisit the history of ARQs that

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1 That's a note of this meeting. We're going to come
 2 to what happened after that, after the mid-morning
 3 break.
 4 So, sir, if we could stop there for 15 minutes, and
 5 return at 11.45, please.
 6 **SIR WYN WILLIAMS:** Certainly.
 7 **MR BLAKE:** Thank you very much.
 8 **(11.30 am)**
 9 **(A short break)**
 10 **(11.46 am)**
 11 **MR BLAKE:** Sir, can you continue to see and hear me?
 12 **SIR WYN WILLIAMS:** I can, thank you very much.
 13 **MR BLAKE:** Mr Sewell, we're going to turn now to a meeting
 14 that took place in September 2008. Can we please look
 15 at FUJ00155257, please. That's a meeting that took
 16 place on 3 September and this is an email dated
 17 5 September with some notes that followed, sent to you
 18 by Roy Birkinshaw. Who was Roy Birkinshaw?
 19 **A.** I think one of the managers in one of the teams.
 20 I don't quite remember his position.
 21 **Q.** "Draft statement [there]:
 22 "PEAK 153276 triggered a review of the audit
 23 mechanism and of the Horizon counter's behaviour. This
 24 review has been going on over the last two weeks. Our
 25 conclusion is there is not sufficient evidence to

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1 are closed."
 2 Number 2, "PS" is presumably a reference to you?
 3 **A.** I think so.
 4 **Q.** "... Audit and Security Teams to progress changes to the
 5 current process to tighten any weaknesses perceived
 6 therein responding to Open ARQs."
 7 If we look at number 4, "PS", so again your name:
 8 "... with assistance from the Audit Team -- to
 9 review the words currently offered to the Post Office in
 10 support of ARQ requests and prosecutions in the light of
 11 the review run."
 12 Can you assist us there with the task that you had
 13 been set.
 14 **A.** Actually, what it says, "review the words", so I think
 15 the main words there is assistance from the Audit Team.
 16 I think they were the players who put the wording in.
 17 **Q.** It says "PS with assistance from the Audit Team", so it
 18 seems as though you were personally tasked with this?
 19 **A.** Maybe I was tasked with it but then I delegated that
 20 down to the team that were relevant to putting the
 21 wording in.
 22 **Q.** So where the task involved, for example, reviewing the
 23 words currently offered, for example, in, perhaps,
 24 witness statements, that wasn't something that you,
 25 yourself got involved in?

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1 A. Absolutely not. No. I relied on the technical people
2 to put those words in.
3 Q. Despite being the named person there to carry out --
4 A. Well, I think the named person is the person maybe who
5 will make it happen.
6 Q. Can we please now look at FUJ00155263. We're moving now
7 to 16 September 2008. This is an email from Anne
8 Chambers to Penny Thomas but you are copied in alongside
9 Gareth Jenkins.
10 A. Indeed, yes.
11 Q. Presumably your evidence is that this was just because
12 you were her manager, or something along this is lines?
13 A. I think so, yes, yes.
14 Q. "Penny,
15 "We discussed this event when it occurred while
16 CABSPProcess was running (at 7.00 pm) but we didn't
17 explain why it might be seen at other times -- and if
18 you were ever questioned about it, it might confuse you.
19 "Basically it happens when one process has locked
20 the message store (usually only very briefly) and
21 another process tries to access the message store at
22 precisely the same time.
23 "The worst offender for doing the locking is
24 CABSPProcess, but it can happen at other times too."
25 Did you understand that the issue wasn't just at the

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1 it not affecting the vast majority of cases, in respect
2 of financial impact.
3 A. I would --
4 Q. Your team is providing witness evidence in proceedings
5 against subpostmasters, is it reassuring to you to hear
6 that it doesn't happen in the vast majority of cases or
7 would you like it to happen in no cases?
8 A. No, obviously no cases. That's what the choice is, yes.
9 Q. Were you aware at this stage that, in some cases, it
10 could cause a financial impact?
11 A. I wasn't aware, no.
12 Q. If that happened or something similar to this happened
13 in, for example, a prosecution of a subpostmaster who
14 wasn't aware of the issue happening because there was no
15 error notice provided to them, might it result in
16 a serious injustice to that subpostmaster?
17 A. I think it would, yes.
18 Q. Can we please turn to FUJ00155265. Penny Thomas to you:
19 "Pete
20 "As an afterthought, what happened with regard to
21 checking event errors for cases we are not advised of?
22 Was someone actioned to deal with this?"
23 Was that a concern that you recall at all?
24 A. I can't remember it, no.
25 Q. Because what Ms Thomas seems to be concerned about here

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1 7.00 pm time but it could also happen at other times?
2 A. The only thing I was aware of was the end of day process
3 that seemed to affect it.
4 Q. Do you read this in the same way as I read it, which is
5 that, in fact, it's not just the end of day process; it
6 can happen at other times too?
7 A. That's what it suggests here, doesn't it?
8 Q. Is that something that you were aware of?
9 A. No, no.
10 Q. "Whether it causes a problem or not depends on (a) what
11 the second process is trying to do and (b) whether that
12 process handles the error situation in a sensible way.
13 "All the checks we have made have shown that, in the
14 vast majority of cases, what is being done has no
15 financial impact and doesn't affect the integrity of the
16 system in any way, and/or the error situation is handled
17 sensibly."
18 Just pausing there, "in the vast majority of cases
19 ... has no financial impact": as somebody whose team was
20 providing evidence in court cases, do you think
21 reference to "vast majority of cases" is reassuring or
22 not reassuring?
23 A. This has been written by Anne Chambers who was Technical
24 Design Authority.
25 Q. I didn't ask who it was written by. She refers there to

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1 is errors that you're not advised of need to be checked
2 as well. Do you recall doing anything about that?
3 A. I don't recall. I don't remember it.
4 Q. Putting aside the particular issue, do you remember at
5 this period, September 2008, some significant taskforce
6 grouping together to have a look at all the historic
7 cases, for example, at Fujitsu?
8 A. The one thing I do remember is the locking issue with
9 the entered of day, and that was proven to be a bug in
10 the system which was corrected and then the ARQs and the
11 events were rechecked after that to prove that they were
12 okay.
13 Q. What she's expressing concern here is that there may be
14 issues that you're not aware of, subject "Other Event
15 Error Checks". Did you instigate some grand taskforce
16 to review --
17 A. We checked event errors, yes, to check -- yes.
18 Q. You checked all historical event errors --
19 A. Yes.
20 Q. -- all previous court cases historically from the time
21 that --
22 A. From that period when we knew the period where the error
23 was, yes.
24 Q. When you say you knew the period the error was, we will
25 see in due course references 2007 to 2008.

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1 A. That's the period.
 2 Q. It was, in fact, confined to that period, wasn't it?
 3 A. Yes.
 4 Q. We saw earlier that the original intention had been to
 5 review historic cases for as long as you had records
 6 for, dating back to 2003?
 7 A. Yes.
 8 Q. But it seems, certainly by this stage, that that didn't
 9 take place, that wider exercise?
 10 A. Yeah, I don't remember -- I don't remember why it was
 11 not done.
 12 Q. Were you of the person who was responsible, if it had
 13 taken place, to have instigated it?
 14 A. I don't believe so no.
 15 Q. Who do you say should have instigated that?
 16 A. I don't know, someone from the design authority of the
 17 audit system.
 18 Q. Somebody from the design authority of the audit system?
 19 A. Yes.
 20 Q. What do you mean by that? Who might that be?
 21 A. It may be Alan Holmes.
 22 Q. So a technical person?
 23 A. A technical person, yes.
 24 Q. Not somebody who is directly involved in the team that
 25 is assisting with the prosecution of subpostmasters?

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1 checking, yes.
 2 Q. It says:
 3 "I think it would be better if you arranged with Mik
 4 for SSC to do this ..."
 5 A. Yes, well --
 6 Q. The suggestion being that you were doing the arranging;
 7 is that not right?
 8 A. Yeah, suggests it, yes.
 9 Q. Pardon?
 10 A. Suggests it, yes.
 11 Q. Sorry?
 12 A. Yes, it suggests that I was managing Penny.
 13 Q. Is that right or wrong?
 14 A. Well, I think --
 15 Q. It doesn't suggest that you were managing Penny. The
 16 question was about the second paragraph. It was
 17 "I think it would be better if you arranged with Mik for
 18 SSC to do this", it reads as though you were the one
 19 coordinating the response. Were you coordinating or
 20 weren't you coordinating?
 21 A. I don't remember.
 22 Q. Gareth Jenkins is a distinguished engineer. We've seen
 23 provided witness statements in proceedings. He is
 24 saying there that the SSC have a better detailed
 25 knowledge of what causes these events and what are known

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1 A. I think one of the technical team should have taken it
 2 on, yes.
 3 Q. Can we please look at FUJ00155268, an email from Gareth
 4 Jenkins to you, 8 October. He says:
 5 "Pete,
 6 "I'm not sure that I'm the best person to be
 7 checking through the ARQ events for Penny.
 8 "I think it would be better if you arranged with Mik
 9 for SSC to do this as part of their normal activities.
 10 Presumably they were doing this while I was on leave,
 11 but now that I'm back Steven has started sending them
 12 back to me.
 13 "I'm happy to advise on specific questions, but
 14 I think SSC have a better detailed knowledge of what
 15 causes these events and what are known to be benign than
 16 I have. They also have processes in place to cover for
 17 leave etc."
 18 It certainly seems, as at 8 October 2008, that
 19 Gareth Jenkins saw you as the person who was responsible
 20 for coordinating who was carrying out various checks.
 21 A. I'm not sure that's true, I'm not sure I'm the person,
 22 but I think he's going through me because I can then go
 23 back to SSC and maybe change it.
 24 Q. So he saw you as what: a postbox, a coordinator?
 25 A. Manager of Penny, who was actually managing the

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1 to be benign than he has. Did that cause you any
 2 concern at all?
 3 A. Not concern. I think he's probably valid in the fact
 4 that he was busy doing other things and the SSC had more
 5 of a -- more influence on what they could check.
 6 Q. But he says there that they have a better detailed
 7 knowledge of what causes the events, so the suggestion
 8 being that he wasn't up to speed in some way as to what
 9 caused the events?
 10 A. Well, that's what he's saying. The SSC were very
 11 technical.
 12 Q. More technical than Mr Jenkins?
 13 A. That's a difficult question.
 14 Q. Do you want to try and answer it?
 15 A. No.
 16 Q. No?
 17 A. No.
 18 Q. Okay. FUJ00155270. We have here 10 October 2008, Anne
 19 Chambers to Gareth Jenkins and Penny Thomas. She says:
 20 "Although Mik's line is, very strongly, that SSC
 21 should have no formal responsibility for checking events
 22 connected with ARQs, in the short term he is happy for
 23 me to help with this on an informal basis (as I have
 24 been doing already).
 25 "This may have to stop as SSC involvement with HNG-X

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1 [that's Horizon Online] increases, and will always be
2 a low priority."
3 Penny Thomas then emails you and says:
4 "A cap-in-hand jobbie."
5 Can you assist us with what this might mean?
6 **A.** Well, we needed help with the analysis (*sic*) of
7 events and Anne Chambers would be the ideal person.
8 **Q.** You -- I think your evidence was that you weren't
9 coordinating that is particular process -- seemed to be
10 emailed by Penny Thomas forwarding that email; did Penny
11 Thomas not think that you were the person who was
12 coordinating the response?
13 **A.** I don't know what that means, "cap-in-hand jobbie".
14 **Q.** Why do you think people didn't want this responsibility,
15 didn't want to be carrying out this task? We've heard
16 Gareth Jenkins not wanting to do it, we've now heard
17 Anne Chambers happy to do it on an informal basis in the
18 short term. What do you think people were reluctant to
19 get involved in that process?
20 **A.** Well, the only thing I could say is they were all quite
21 busy with other things and it required a technical
22 knowledge to go through the events to look for this.
23 **Q.** Do you recall any concerns you had about the inability
24 to have sufficient people checking what seemed quite
25 like a serious matter?

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1 **A.** Yes.
2 **Q.** Let's have a look at the attachment to that email. That
3 can be found at FUJ00155272. We see there "HNG-X
4 [that's Horizon Online] Change Proposal", date raised,
5 13 October 2008, and it has you named there as the
6 "change owner"; is that correct?
7 **A.** I think it was because I was the manager in the -- at
8 that particular sort of work.
9 **Q.** That's quite a responsibility, isn't it?
10 **A.** I think it's default because it was a security thing.
11 **Q.** So is your evidence that you were or weren't
12 significantly involved in this change proposal?
13 **A.** Significantly involved insofar as I knew what was going
14 on and I bought into it, yes.
15 **Q.** How high up within the company would this proposal have
16 been seen?
17 **A.** It would depend on what the change proposal was, how
18 important it was.
19 **Q.** So you as the change owner here, would you have raised
20 it with people who managed you?
21 **A.** Yes, my manager would have been involved, yes.
22 **Q.** So who would you have raised it with?
23 **A.** 2010. I think that would be Howard Pritchard.
24 **Q.** 2008.
25 **A.** 2008? Um ... I think it was Howard Pritchard still.

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1 **A.** Well, I think we found the appropriate people and they
2 did the job.
3 **Q.** Can we please look at FUJ00155271, please. We're now
4 moving to a proposed technical solution. So we have all
5 these people carrying out checks that we've had a look
6 at but we're now moving on to a change proposal,
7 a formal change proposal. Did you understand what
8 a change proposal was?
9 **A.** Yes. Yes, I did.
10 **Q.** Can you briefly explain to us what that might be,
11 a change proposal?
12 **A.** When the project decided it would be a change to the way
13 the things were being done, it would formally be done
14 via a change proposal, which specified what the action
15 was and why it was being done.
16 **Q.** We have the email from Alan Holmes to you and others:
17 "Gents
18 "As discussed last week, I have put the attached
19 together as a proposed [Horizon Online change proposal]
20 to handle the processing of counter events within Audit.
21 "Any initial comments?"
22 Do you recall that the plan was for Horizon Online
23 to automate the process that was being undertaken?
24 **A.** In time, yes.
25 **Q.** Yes?

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1 I think it was still Pritchard.
2 **Q.** Is the purpose of a document like this to ultimately
3 share it with the Post Office?
4 **A.** The ultimate is to cost out what this is going to cost
5 and agree to it with all parties that are involved.
6 **Q.** The counterparty being the Post Office?
7 **A.** I don't remember the Post Office being involved in this
8 CP, no.
9 **Q.** Well, if we look at the very top we have Fujitsu's logo,
10 we have the Post Office's logo, it is a change proposal
11 to the Horizon system. Presumably this is a document
12 that you are preparing for the Post Office?
13 **A.** No, it's an internal document. It's change proposal to
14 our existing systems.
15 **Q.** So was the intention for this document to always be
16 an internal document that wasn't seen by the Post
17 Office?
18 **A.** I just think it's an internal document from ICL --
19 **Q.** I'm going to read to you from the document. The second
20 substantive paragraph there says:
21 "Historically, the Horizon Audit Service has relied
22 solely on the retrieval and analysis of archived Riposte
23 message store data when servicing [the Post Office]
24 audit data requests for Horizon branch transaction data.
25 A recent issue ..."

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1 That refers to the PEAK incident log that we have
2 seen this morning:

3 "... has identified a deficiency in this approach.
4 In certain failure scenarios, it is possible that the
5 Horizon counter may write an inconsistent set of
6 messages to the local message store. This casts doubt
7 over the overall integrity of the resulting transaction
8 data."

9 If we could have a look at the paragraph below that.
10 About halfway through that paragraph, it says:

11 "A tactical solution has been incorporated into the
12 Horizon audit retrieval process to provide a short-term
13 remedy to this problem. For every branch Riposte data
14 retrieval, the archived events generated by counters at
15 the branch are also analysed to identify any possible
16 occurrences or problems which might adversely affect the
17 integrity of the transaction data."

18 So having identified the problem, the process that
19 was being undertaken prior to the change was a manual
20 solution that, as it explains there, remedies the
21 problem?

22 **A.** Checking the events, yes.

23 **Q.** Checking the events.

24 **A.** Yes.

25 **Q.** Could we please have a look below that, thank you very

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1 because it's taking something from a server to
2 a workstation. Keeping data such as that on
3 a workstation is itself inherently problematic.

4 **A.** There is a risk of course, yes.

5 **Q.** "It requires local and insecure storage of event audit
6 data, invalidating certain statements made within the
7 current witness statement."

8 Again, something you would have been aware of --

9 **A.** Yes.

10 **Q.** -- that the process invalidated certain statements that
11 had been made in witness statements.

12 "It has no DR mechanism in the event of DR [and
13 gives a reference there]."

14 Are you able to assist us with that or is that too
15 technical?

16 **A.** No, that's the disaster recovery mechanism, with the
17 disaster recovery site at Lewes.

18 **Q.** Could we please go over the page. It says:

19 "Whilst we believe that we have to live with this
20 tactical solution for the remaining life of the Horizon
21 audit system, a permanent solution for the [Horizon
22 Online] audit solution is required which addresses the
23 above deficiencies."

24 Then it sets out some requirements.

25 Under the final heading on that page, "Reason for

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1 much. It then highlights deficiencies with the current
2 solution. It says:

3 "It is a largely manual process which is error prone
4 and time consuming."

5 Is that something you were aware of, that the
6 process that was being undertaken up until the change is
7 made was error prone?

8 **A.** I don't know about that. I wasn't aware there was --
9 error prone. It meant it was a manual exercise. Any
10 manual exercise contains risk.

11 **Q.** You say you don't know about that. I mean, this is
12 a document that was sent to you.

13 **A.** Everything we did was to check the events without
14 finding errors.

15 **Q.** This is a document that was sent to you of which you are
16 the owner?

17 **A.** Mm-hm.

18 **Q.** It describes the process as "error prone". Is that
19 something that you were aware of?

20 **A.** Well, I think you have to be because it's a manual
21 process, yes.

22 **Q.** It says:

23 "It involves moving large volumes of data between
24 the audit server and workstation."

25 I think we've seen that that in itself carries risks

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1 Change and Justification for Required Date", it says:

2 "While we do not believe that (due to time
3 constraints) it is practicable to introduce this change
4 into Horizon, it is required to ensure the viability of
5 the ongoing Prosecution Support Service within [Horizon
6 Online]."

7 So it seems to be that there wasn't sufficient time
8 or perhaps sufficient -- I think we've heard some
9 evidence about it costing a lot to introduce into
10 Horizon, what we know as Legacy Horizon, and it was
11 instead going to be introduced when the new system was
12 implemented.

13 **A.** Yes, that's right.

14 **Q.** Would you agree with the costs' issue as well as time,
15 or ...

16 **A.** That was a major player in this, yes, the cost of
17 introducing it into the Legacy system, yes.

18 **Q.** If we go over the page, please, just pausing there,
19 though, with the time constraint and the cost
20 constraints, people were, during this period, being
21 prosecuted or there were court cases that were going on
22 relating to the Horizon system. It might be asked why
23 it wasn't seen as sufficient priority in those
24 circumstances?

25 **A.** To introduce it into the earlier release?

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1 Q. Yes.

2 A. (a) the cost -- (a) the resource availability, and this
3 would have to be accepted by the project, the Post
4 Office project internally for this to go -- be accepted,
5 and we feel the board -- it went through a change
6 control board -- would probably not have accepted it.

7 Q. If, as we've seen, the process that was being undertaken
8 in the interim period was error prone, as I say, if
9 there were court cases that were ongoing, why do you
10 think it was not seen as that significant a priority?

11 A. Well, there was risk attached to it because it was
12 a manual process. It was just important that this was
13 carried out successfully.

14 Q. Yes, and why do you think a more reliable solution
15 couldn't have been implemented earlier?

16 A. For cost, as much as anything, and resource
17 availability, and I think it would have put the whole
18 HNG-X proposals pushed back.

19 Q. Thank you. "Consequences if Not Approved":
20 "We are obliged to present and vouch for the
21 integrity of audit data that is fit for purpose --
22 ie admissible as evidence in court. If this change is
23 not approved, we will need to continue operating the
24 current Horizon tactical process for the lifetime of
25 [Horizon Online]. This raises the following issues:

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1 "This is a follow-up to today's meeting, minutes of
2 which roughly below."
3 So it provides the minutes of the meeting of
4 15 October from somebody called Steve Evans. Who was
5 Steve Evans?

6 A. I think he was a technical person from SSC.

7 Q. He says there, towards the bottom, he says:
8 "However the real cost of this development (or
9 rather of not doing it) is in the potential for mistakes
10 (especially by a 'new' resource, without the experience
11 of SM) to be made in a manual process which uses data so
12 far extracted from the original source: which is the
13 proposed new wording for the CP."
14 If we scroll up, please, we have Alan Holmes sending
15 a new version of the change proposal to yourself and
16 others, and he says:
17 "As discussed at the last meeting, I have watered
18 down the proposed [change proposal] -- copy attached."
19 Are you able to assist us with what was meant by
20 "watered down"?

21 A. I don't recall. I don't recall.

22 Q. The change proposal appears on the next page so, if we
23 could go to page 2, please, this is the version he
24 described as "watered down". Could I ask for it to be
25 brought up side by side with the earlier version, which

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1 "We are liable to service penalty payments if we
2 cannot provide dependable audit data and witness
3 statements when requested by [the Post Office].
4 "There is a risk of Prosecution Support Service
5 suspension if there is any interruption to the current
6 tactical process.
7 "Will require ongoing allocation of resource [and
8 it's to insert the number of man-days per month] to
9 operate the current tactical process."
10 Then it says:
11 "Data integrity issues inherent with the current
12 process need to be addressed by weakening the content of
13 the witness statement."
14 Were you aware that data integrity issues that were
15 inherent with the process that was ongoing needed to be
16 addressed by weakening the content of the witness
17 statement?

18 A. Only by reading these words. They're not my words.

19 Q. That wasn't a concern of yours at the time?

20 A. I was concerned with, overall, getting the thing through
21 and ensuring that events were checked period to going to
22 HNG-X.

23 Q. Can we please look at FUJ00155276. If we look at the
24 bottom email, there seems to have been a meeting on
25 15 October, and it says:

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1 is FUJ00155272. It should be the first page of that
2 document.
3 So that's the earlier version on the right-hand side
4 and the watered down version on the left-hand side. We
5 see there at the bottom, on the left-hand side, it now
6 says:
7 "The current Horizon tactical solution is a largely
8 manual process, the operation of which is reliant on
9 a few key individuals. Whilst we believe that we will
10 have to live with the tactical solution for the
11 remaining life of the Horizon audit system, a permanent
12 solution for the [Horizon Online] audit solution is
13 required. In outline, this will require the following
14 ..."
15 What has been removed from this version, we can see
16 on the right-hand side, is the number of deficiencies
17 that were identified on the right-hand side. So the
18 reference to, for example, the manual process being
19 "error prone" does not appear on this watered down
20 version; do you see that?

21 A. Yes.

22 Q. If we, on the left-hand side, turn to page 4, please,
23 and on the right-hand side turn to page 3., we have
24 there "Consequences if Not Approved". Now, we saw on
25 the right-hand side reference to, for example, that

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1 final bullet point in the first box:
 2 "Data integrity issues inherent with the current
 3 process need to be addressed by weakening the content of
 4 the witness statement."
 5 That no longer is included in the watered down
 6 version on the left-hand side. It says instead:
 7 "We are obliged to present and vouch for the
 8 integrity of audit data that is fit for purpose --
 9 ie admissible as evidence in court. If this change is
 10 not approved, we will need to continue operating the
 11 current Horizon tactical process for the lifetime of
 12 HNG-X."
 13 So "data integrity issues inherent with the current
 14 process" no longer appears.
 15 Do you recall discussion at this meeting about
 16 watering down that version on the right-hand side?
 17 **A.** No, that's the design authority that's decided to do
 18 that.
 19 **Q.** When you say that's the design authority, what do you
 20 mean by that?
 21 **A.** Alan Holmes.
 22 **Q.** Alan Holmes. So we saw on the front, if we stick with
 23 the left-hand side, and look at page 2 on the left-hand
 24 side -- the right-hand side can come away -- we have
 25 Alan Holmes as the "originator" but we have yourself as

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1 you should have been more involved in the detail?
 2 **A.** I'm the change owner here. I'm not the originator of
 3 this CP. Change owner by default because I was in the
 4 Security Team, and it's a security change proposal.
 5 **Q.** If we look at the covering email, that's on page 1,
 6 there are very few people who are involved in this.
 7 There is meeting and meeting taking place about this
 8 issue. You're named there as a senior individual, as
 9 a recipient from Mr Holmes, circulating a document that
 10 was discussed at the last meeting. Do you not think
 11 that you should have played more of a role in this
 12 significant issue?
 13 **A.** I played a role in the issue.
 14 **Q.** Do you not think you should have got down into the
 15 detail of what was going on, given your team's role with
 16 regard to the prosecution of subpostmasters?
 17 **A.** My detailed knowledge was limited, so I couldn't get any
 18 more involved than I did.
 19 **Q.** But you had seen documents that relate to concerns about
 20 the integrity of the data?
 21 **A.** Mm-hm.
 22 **Q.** Should you not have been more concerned?
 23 **A.** I would always listen to the technical authority to
 24 advise me.
 25 **Q.** You may have always listened to people but people may be

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1 the "change owner"?
 2 **A.** Mm-hm.
 3 **Q.** Are we to understand from your evidence that, despite
 4 being the "change owner", that wasn't something that was
 5 discussed with you?
 6 **A.** I would listen to the technical sponsor, the originator,
 7 they're the same person and, if that was their wording,
 8 I would go along with it.
 9 **Q.** Mr Sewell, your evidence so far about witness
 10 statements, for example, was "I didn't look at witness
 11 statements, I wasn't involved in them". Your evidence
 12 about to be the change proposal of which you're named as
 13 the change owner is, effectively, "I would have just
 14 seen what those with greater knowledge did, I would have
 15 approved it".
 16 Some people might be struggling to understand quite
 17 what you did. What did you see as your role, if not to
 18 get involved in things like witness statements or if not
 19 to get involved in something where you are named as the
 20 change owner.
 21 **A.** I relied on other people with the technical knowledge to
 22 give me the advice.
 23 **Q.** You may have relied on other people but don't you think
 24 as manager of your team, the team that was assisting
 25 with the prosecution of subpostmasters, do you not think

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1 asking why you weren't doing more about it?
 2 **A.** What do you mean by that?
 3 **Q.** Well, you've seen, for example, concerns about data
 4 integrity.
 5 **A.** Yes.
 6 **Q.** You are managing a team that provides witness statements
 7 in criminal prosecutions and civil claims against
 8 subpostmasters. Why weren't you raising this at the
 9 highest levels? Why weren't you getting more involved
 10 in resolving the issues and ensuring the integrity of
 11 the data that Fujitsu were providing to the court that
 12 led to people's prosecutions?
 13 **A.** This was at the highest level. This is Alan Holmes, the
 14 design authority for the audit system.
 15 **Q.** Are there no higher levels within Fujitsu in the United
 16 Kingdom?
 17 **A.** I guess there would have been, yes.
 18 **Q.** Yes. So Alan Holmes was the highest level, as far as
 19 you were concerned, that this was being raised with?
 20 **A.** Regarding the audit system, yes.
 21 **Q.** You didn't see it as your job, as the person managing
 22 the team that was involved in criminal prosecutions, to
 23 do anything more than you were doing?
 24 **A.** I did what was necessary.
 25 **Q.** What was necessary?

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1 A. I listened to Alan Holmes and took his recommendations.
 2 Q. That was the limits of your job, was it?
 3 A. Regarding to the audit, yes, on this occasion, yes.
 4 Q. Can we please look at FUJ00155278. 24 October 2008,
 5 there seems to be another meeting. This is from Penny
 6 Thomas. She says -- I believe this is from Penny
 7 Thomas, her name is at the top -- it certainly is
 8 recorded there from somebody. It says:
 9 "At today's meeting, Pete agreed that (with Alan and
 10 Roy's input) we urgently need to thrash out the words to
 11 sell the CP to interested parties."
 12 Now, she doesn't say, "Alan agreed", she says, "Pete
 13 agreed" -- or whoever recorded this says "Pete agreed".
 14 It does seem, from the contemporaneous documents, that
 15 you were more involved perhaps than your evidence today
 16 is suggesting.
 17 A. Well, I'm the sponsor that wanted to see that the CP was
 18 approved, so that would be my interest.
 19 Q. So now you're involved because you were the sponsor?
 20 A. Well --
 21 Q. But before, when we were looking at drafts, you weren't
 22 involved because you were just the change owner?
 23 A. Well, the change owner -- sorry, I didn't mean sponsor.
 24 Change owner, that was my responsibility.
 25 Q. So you weren't significantly involved to actually get

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1 words in.
 2 Q. But you want to sell a proposal that your evidence is
 3 suggesting you weren't really very much involved in?
 4 A. I was selling the proposal to the change board, to
 5 assure that we got the board to approve it.
 6 Q. Was your intention to approach the board in ignorance of
 7 the history of that change proposal, in ignorance of,
 8 for example, concerns that were raised in earlier
 9 versions about system integrity?
 10 A. That was taken out.
 11 Q. Indeed. Do you think you were well placed to address
 12 that board in ignorance of that?
 13 A. I wasn't qualified to question what the design authority
 14 said.
 15 Q. So you would take whatever the design authority
 16 suggested to you and try and sell that without
 17 knowledge, despite having been in those various
 18 meetings?
 19 A. Yes.
 20 Q. Can we please look at FUJ00155 --
 21 **SIR WYN WILLIAMS:** Sorry, Mr Blake.
 22 Just so I'm clear. That last document uses the
 23 phrase "interested parties" in terms of to whom it is to
 24 be sold. Can I be clear what your understanding of
 25 "interested parties" is, Mr Sewell?

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1 into the detail of the --
 2 A. No.
 3 Q. -- the change proposal that we've just seen but you were
 4 significantly involved enough to have agreed that you
 5 need to thrash out the words to sell the change proposal
 6 to interested parties; is that right?
 7 A. Yes.
 8 Q. How could you have formed that view if you weren't
 9 involved in the detail of the change proposal itself?
 10 A. Because the wording would be put together from, as we
 11 said here, Alan and Roy's input, and I would then take
 12 that CP to the board.
 13 Q. You were at meetings where the change proposal was
 14 discussed; there was a version that raised issues with
 15 data integrity; there was then a decision to water down
 16 that version; you were present at those meetings; you
 17 were receiving the various drafts; and you, here, say
 18 that you urgently need to thrash out the words to sell
 19 that proposal to interested parties. Surely you were
 20 more involved and knowledgeable about the words that
 21 we've looked at today than your evidence today is
 22 suggesting?
 23 A. I offered whatever I could. These words are not mine
 24 "We urgently need to thrash out this" is correct but it
 25 wasn't labelled on to me. It's the people who put the

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1 A. These parties were relevant people who the CP would
 2 normally affect, with regard to resourcing or costing,
 3 or affect on the business side.
 4 **SIR WYN WILLIAMS:** Yes, but that's generality. In this
 5 particular case, can you identify who they might be: are
 6 they departments of Fujitsu; are they the board of
 7 Fujitsu; are they the Post Office or what?
 8 A. No, they would be working managers that formed the board
 9 of the CP board.
 10 **SIR WYN WILLIAMS:** Right, so all Fujitsu people?
 11 A. Yes, yes, sir.
 12 **SIR WYN WILLIAMS:** All right, fine.
 13 **MR BLAKE:** Can we please look at FUJ00155371, please. We
 14 have there from Penny Thomas -- 26 November 2008, she
 15 says:
 16 "Attached: my précis with Alan's comments.
 17 "Plus a standard ARQ form."
 18 If we turn over the page, it is a document that we
 19 have looked at, although we haven't looked at it with
 20 the various comments in it. Just to be clear, you are
 21 named on the first page as a required attendee of this
 22 meeting on 26 November 2008.
 23 Could we please look at that first section, "The
 24 Audit System and ARQ ... Service". There is a reference
 25 there, in the second bullet point -- it says as follows,

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1 it says:

2 "The completeness of the data extracts provided is
3 assumed, and witness statements state as much."

4 There's a comment there from Mr Holmes. He says:

5 "It is more than 'assumed' or at least so we
6 thought.

7 "The Riposte sequence numbers are checked for gaps
8 and from this we assert that the extract shows a true
9 and complete representation of what happened at branch."

10 If we scroll down, please, under "Problem", if we
11 look at the fourth bullet point, it says:

12 "The statements currently asserted in Witness
13 Statement cannot be guaranteed in all cases (after this
14 [change proposal]) (See example on last page) ..."

15 The words "example on" and we will see the word
16 "reliably" are added in this document:

17 "... but this [change proposal] seeks to strengthen
18 the process and allows to us reliably identify where the
19 assertion can or cannot be made."

20 So it was known at this stage, it seems, that there
21 were concerns about not just a particular paragraph in
22 a witness statement but in witness statements plural,
23 because the words changed there are the words "example
24 on"; do you see that?

25 A. Yes.

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1 of the standard witness statement. That's a document
2 that we've already seen but, if we scroll over -- scroll
3 down, over the page, into the next page, if we keep on
4 going, please, into this next page -- we see there the
5 words that I started with today:

6 "The integrity of audit data is guaranteed at all
7 times from its origination, storage and retrieval to
8 subsequent despatch to the requester. Controls have
9 been established that provide assurance to Post Office
10 Internal Audit that integrity is maintained."

11 Those aren't actually the words I took you to
12 letter, these are the words but they've been highlighted
13 in red, presumably as some sort of concern, and you'll
14 see another significant passage that I have taken you to
15 highlighted in red. That's on page 10.

16 Those are the words:

17 "There is no reason to believe that the information
18 in this statement is inaccurate because of the improper
19 use of the computer. To the best of my knowledge and
20 belief at all material times the computer was operating
21 properly, or if not, any respect in which it was not
22 operating properly, or was out of operation was not such
23 as to effect the information held on it."

24 That has been highlighted in red and is circulated
25 prior to this meeting on 26 November 2008. Those are

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1 Q. Wasn't that a serious issue, then, if the witness
2 statements currently couldn't be guaranteed, the
3 accuracy of those witness statements couldn't be
4 guaranteed?

5 A. I don't remember, I don't remember.

6 Q. We've seen you tasked earlier with reviewing things such
7 as witness statements. I think your evidence was you
8 were named but it was people underneath you?

9 A. That was correct.

10 Q. But, as the named individual who was responsible for
11 reviewing historic or previous witness statements, does
12 that not cause you some concern at the time?

13 A. I didn't review any witness statements.

14 Q. You were named as being responsible for the review of
15 witness statements, as somebody who was named as
16 responsible for the review of witness statements, does
17 that cause you or did that cause you any concern?

18 A. At the time, I don't remember it. I don't remember it.

19 Q. Does that cause you concern now?

20 A. It's too long ago for me to remember. I don't remember.

21 Q. I didn't ask you to remember, but the fact that there
22 were witness statements that had been used that couldn't
23 be guaranteed, does that cause you some concern?

24 A. Today, yes, that sounds alarming.

25 Q. If we go over, please, to page 4, there's the attachment

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1 the same words that, as we saw, Gareth Jenkins expressed
2 a concern about in relation to his use of those
3 sentences. Do you recall having a concern about the use
4 of that passage at this time?

5 A. I don't recall, no.

6 Q. As somebody who was in charge of the team that was
7 assisting with criminal prosecutions, do you think that
8 it should be perhaps more prominent in your memory?

9 A. This is 15/16 years ago. No. Not for me.

10 Q. No, not given everything that's happened with Horizon?

11 A. I haven't seen some of these documents for many years.

12 Q. Don't bring back any recollections at all?

13 A. No.

14 Q. Can we please now turn to FUJ00155373. We're now in
15 December 2008, 1 December, an email from Penny Thomas to
16 yourself:

17 "Please find attached my weekly report."

18 So it seems as though she is sharing with you
19 a weekly report:

20 "As you will see, no work has been undertaken in the
21 audit room this week. As a result the ARQ OLA may again
22 be breached as a result of my absence from the office."

23 So it seems as though she wasn't in the office this
24 week, but she says as follows:

25 "Also, as a result of Steve Evans and Alan Holmes

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1 note concerning the audit CP and the witness statement
 2 content I do not believe we should send any further
 3 standard witness statements until we have had the chance
 4 to discuss what was said last week and the implications.
 5 I currently have 3 outstanding."

6 So she, at that stage, raises quite serious concerns
 7 about the content of witness statements arising from
 8 this issue.

9 A. Yes.

10 Q. This isn't something that you recall?

11 A. I would think that's got something to do with the manual
 12 exercise that was going on, the manual checking of
 13 events.

14 Q. It follows the meeting where the note is circulated
 15 about the audit CP and the witness statement with the
 16 red highlighting that we've just been looking at. It
 17 follows that being circulated. Was this not a matter
 18 that needed to be brought to the attention of very
 19 senior people within Fujitsu?

20 A. I don't remember whether it did or not.

21 Q. That wasn't a "remember" question; that was a question
 22 about whether it should or shouldn't have been. The
 23 question is: given that Penny Thomas is expressing
 24 concern about witness statements that were being used in
 25 criminal proceedings and civil proceedings, should that

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1 "Howard

2 "Some brief words ..."

3 This is entitled "ARQ Service problem":

4 "... the problem first raised in SI has been fully
 5 investigated by SI, Audit and SSC.

6 "The real problems I can see is the overhead in the
 7 event checking and Penny's statement which contractually
 8 is now incorrect."

9 You seem to describe there to Mr Pritchard that
 10 Penny's statement is contractually incorrect. What do
 11 you mean by "contractually is now incorrect"?

12 A. I don't remember. I don't remember what that means.

13 Q. An incorrect witness statement is not simply
 14 a contractual problem, is it? It's a more significant
 15 problem than that, isn't it?

16 A. It's probably relating to the wording.

17 Q. Yes.

18 A. Yeah.

19 Q. The use of incorrect wording, for example, in criminal
 20 proceedings, that would be a very serious matter indeed,
 21 isn't it?

22 A. Yes.

23 Q. Why are you there describing it as, in effect,
 24 a contractual problem, rather than a real life problem
 25 affecting people's lives?

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1 not have been a matter to have raised at the very
 2 highest levels of your company?

3 A. I think the concern was with the witness statement and
 4 what it was saying.

5 Q. Yes, and my question was about whether it should have
 6 been raised at senior levels within your company?

7 A. I don't recall.

8 Q. It's not a recollection question; it's a question about
 9 whether you now, looking at it now --

10 A. Well, now, yes.

11 Q. -- think that it should have been raised.

12 A. Yes, I do.

13 Q. In terms of your recollection, do you remember whether
 14 that was or wasn't raised?

15 A. I don't recall.

16 Q. You're being asked by the stenographer just to speak up
 17 slightly.

18 A. Sorry.

19 Q. If you could just repeat -- I think he said, "I do not
 20 recall".

21 Can we please bring up onto screen FUJ00155378,
 22 please. I'm going to start with the very bottom email,
 23 same day, 1 December 2008, from yourself to Howard
 24 Pritchard; can you remind us who Howard Pritchard was?

25 A. He was the Security Manager:

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1 A. Choice of words was probably wrong.

2 Q. It may be a choice of words but does it imply some
 3 degree of seriousness in that you didn't see it as
 4 a serious problem affecting people's lives; you saw it
 5 as more of a business problem, a contractual problem?

6 A. I think it was the words but I don't remember it that
 7 well.

8 Q. If we could scroll up slightly, please, thank you, to
 9 that email above. Penny Thomas to yourself:

10 "Hi Pete

11 "Is the [change proposal] now in the system? It
 12 must be stressed that the current process for event
 13 checking is not an acceptable procedure.

14 "We need to consider what [to] do with regards to
 15 witness statements already provided, (1) where the case
 16 has not yet gone to court and (2) where the case has
 17 gone to court. The identification of ask (1) may well
 18 result in questions seeking the viability of (2)."

19 So she seems to raise a very serious concern there
 20 about witness statements having been provided already in
 21 court proceedings and, insofar as there are cases that
 22 haven't gone to court, if it's raised, that in itself
 23 could raise questions about cases that have already gone
 24 to court. Did you not see that as a serious issue to be
 25 dealt with?

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1 A. I don't recall. I don't recall it.
 2 Q. You don't recall that?
 3 A. No.
 4 Q. Was it not significant enough in your memory to
 5 recall --
 6 A. No.
 7 Q. -- a concern by the person who had been providing
 8 witness statements in court proceedings raising concerns
 9 about the accuracy of those statements?
 10 A. Yes, I don't remember what the action from it.
 11 Q. Do you remember concerns? I mean, you had a very small
 12 team. Penny Thomas was somebody you managed. Do you
 13 not remember her expressing concerns to you about
 14 witness statements that she had provided?
 15 A. Well, this -- the CP says that, the --
 16 Q. Yes, but do you not remember it? You were managing her,
 17 you were having team meetings, you were having feedback
 18 sessions, you had appraisals?
 19 A. I don't remember individual things. No, I don't.
 20 I don't.
 21 Q. Could we please scroll up. Howard Pritchard, to you.
 22 I'm going to need you to interpret this particular
 23 email. He says:
 24 "Pete.
 25 "At the ISMR, the [change proposal] was discussed
 97

1 Q. Can we please now look at FUJ00155385. We're now on
 2 11 December 2008, an email from Penny Thomas. You are
 3 a recipient of this email. "Proposed Slides for ARQ
 4 Service Issue", and she says there:
 5 "Please find attached proposed slides for
 6 presentation to Wendy."
 7 Can you assist us with who Wendy was?
 8 A. Wendy was the director of the project.
 9 Q. Now, we're going to look at those slides in a moment.
 10 I'm just going to take you to a further email before we
 11 do that, and that is at FUJ00154833. Thank you. So
 12 those slides, the original slides having been circulated
 13 on 11 December, by the 15th they had been altered
 14 slightly. This email you're included as well.
 15 A. Yes.
 16 Q. Now, it's a little difficult to read this email because
 17 there are words that Penny Thomas has quoted from Graham
 18 Allen's email below, and there is her response to those
 19 questions.
 20 So starting with that first substantive paragraph,
 21 he says, Graham Allen says:
 22 "Do we need to add the last point on slide 2 that
 23 although we know of no instance where we will not get
 24 an error which will indicate incompleteness, we cannot
 25 guarantee this."
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1 and it was agreed ..."
 2 Can you just assist us, what does ISMR ...
 3 A. I can't remember.
 4 Q. No?
 5 A. I can't remember.
 6 Q. "... was discussed and it was agreed that the content
 7 will need to be rewritten as there are possible conflict
 8 ... ie potential ... This will be reject by the board.
 9 "Please rewrite the [change proposal] and if
 10 required speak to Hilary to get further wording so that
 11 it can be accepted as soon."
 12 Can you please assist us with the language that is
 13 being used here? There seems to be some issue that he
 14 won't perhaps commit to writing.
 15 A. I don't know. I don't know. I don't know.
 16 Q. "The content will need to be rewritten as there are
 17 possible conflict ... ie potential": potential what?
 18 A. I don't know, sir.
 19 Q. Did you email him back and say, "What are those dots?
 20 What do you mean by that?" He seems to assume that you
 21 know what he would be talking about there?
 22 A. Mm. Well, I don't.
 23 Q. Was there something so bad that was unspeakable that
 24 couldn't be put into writing?
 25 A. Not that I was aware of, no.
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1 Her response is:
 2 "Tivoli event data is known to be incomplete, viz
 3 turn off TECs during event storms, gaps in the events
 4 sequences generate by OMDB, there are occasional corrupt
 5 records within the events audit tracks."
 6 He then also asks:
 7 "Do we need to add something about if we find a gap
 8 we do not know what to do about this? If we do say this
 9 we will need to say what we are doing to progress
 10 a solution to this or what the options are to tell [the
 11 Post Office] that we can't provide data?"
 12 She says, "Added to slide 5", and we will come to
 13 look at slide 5 or the new slide 5.
 14 Then he comments on slide 3:
 15 "... I think the second point should say 'prone to
 16 human error'. I'm presuming if we automated this the
 17 error indicated in this point would be removed."
 18 She says:
 19 "It's not just human error, the process is not
 20 secure. But yes, that is my belief, partially
 21 automating will remove this point.
 22 "Slide 3, why does the [change proposal] not suggest
 23 full automation or does it to automate as much as
 24 possible in which case it should probably be worded like
 25 that?"
 100

1 She says:
 2 "We cannot fully automate, we will always need
 3 someone to check unfiltered errors."
 4 Then she attaches the amended presentation and says:
 5 "Please let me know if I haven't fully covered your
 6 comments, or if any others have been identified."
 7 I'd like to take you to the presentation, which is
 8 behind that, so if we just go over the page and onto
 9 page 3, please.
 10 So there is a PowerPoint presentation. If we scroll
 11 up, please, it's "Prosecution Support Urgent Issue". Do
 12 you recall this PowerPoint presentation?
 13 **A.** Yes, I think so.
 14 **Q.** Do you recall that there was going to be this meeting
 15 with Wendy and that this was a presentation to be made
 16 to her?
 17 **A.** Yes, I'm not sure I was at the meeting but, yes.
 18 **Q.** If we scroll down, please, the first substantive slide,
 19 "ARQ service (Audit System)", concerns being addressed
 20 here:
 21 "The completeness of data was underwritten by our
 22 witness statement.
 23 "Counter problems -- PEAK [and it's a reference to
 24 that PEAK we looked at] -- 'The fact that EPOSS code is
 25 not resilient to errors is endemic'."

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1 **Q.** Yes?
 2 **A.** Yes.
 3 **Q.** Over the page, please, "Associated Issues":
 4 "Historic and current data has proven to be
 5 incomplete.
 6 "Ramifications of historical data provisions.
 7 "Fujitsu reputation."
 8 Wasn't this the moment to have a fundamental rethink
 9 of Fujitsu's assistance in respect of prosecuting people
 10 based on Fujitsu data?
 11 **A.** You're asking me that question?
 12 **Q.** Yes, you were the manager of the team that provided all
 13 these witness statements. We're reading here
 14 a PowerPoint presentation that is prepared internally,
 15 which raises concerns about -- in fact it says, "Current
 16 standard witness statement is now incorrect".
 17 Knowledge -- corporate knowledge -- that the current
 18 standard witness statement was incorrect, was this not
 19 a time to have a real hard think about the way that
 20 Fujitsu went about its assistance to the Post Office?
 21 **A.** I think it is now I look at it now, yes. At the time
 22 this went to senior management of the project.
 23 **Q.** Is your evidence, then, that, yes, now, reflecting on
 24 this, that was the moment but, at the time, it wasn't,
 25 didn't seem to be as significant as it now seems? Or --

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1 **A.** Mm-hm.
 2 **Q.** It says:
 3 "We are manually cross-checking with available event
 4 data but completeness is still not guaranteed."
 5 If we go over the page, please, "Manual and Proposed
 6 Process":
 7 "Manual process is onerous and must be reviewed.
 8 "It is error prone ..."
 9 So we, again, see that phrase that was ultimately
 10 taken out of the change proposal.
 11 **A.** Yes.
 12 **Q.** "It is error prone and time consuming.
 13 "It involves moving large volumes of data between
 14 the audit server and workstation.
 15 "It requires local and insecure storage of event
 16 audit data, invalidating certain statements made within
 17 the current witness statement."
 18 If we go over the page please, "Immediate Issue --
 19 Witness Statements and Court Attendance":
 20 "Current standard witness statement is now
 21 incorrect -- we guarantee completeness and integrity."
 22 Is your understanding of that that, in the *pro forma*
 23 witness statement that we've seen quite a lot of,
 24 Fujitsu or the author guarantees completeness and
 25 integrity of the data?

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1 **A.** I don't really remember my views on it, no.
 2 **Q.** But if it was seen as significant, presumably you would
 3 remember?
 4 **A.** No, it was a long time ago.
 5 **Q.** So even something that led to or could be associated
 6 with the prosecution, conviction, imprisonment of
 7 a subpostmaster because of an incorrect witness
 8 statement, might that have been a significant event in
 9 your life?
 10 **A.** It would have been and I didn't realise it at the time.
 11 **Q.** Can we please look at FUJ00155389. This is an email
 12 from Penny Thomas to you and others. She says:
 13 "Anne's comments need to be part of our discussion
 14 tomorrow."
 15 That's comments of Anne Chambers. If we scroll
 16 down, we can see subject "New Witness Statement Request
 17 Support", and Anne Chambers has provided some comments
 18 to Penny Thomas and to Gareth Jenkins, which are
 19 forwarded to you and others. She says as follows, she
 20 says:
 21 "When such long periods are covered, especially at
 22 branches with many counters, there are almost certainly
 23 going to be some events which look alarming but are, as
 24 far as I'm concerned, not particularly unusual over the
 25 estate as a whole. We wouldn't normally investigate

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1 them unless there were some grounds for thinking they
2 had caused a problem -- maybe because the [postmaster]
3 queried something or something showed up on the
4 reconciliation stream."

5 Just pausing there, knowing that there was an issue
6 that wouldn't be recognised by the subpostmaster because
7 there wasn't an error message coming up on their screen,
8 do you think that it is sufficient to rely on the
9 postmaster to have identified a problem?
10 **A.** Not necessarily, if he didn't know about it.

11 **Q.** Yes, and she continues to say:

12 "Trying to justify and assess them so long
13 afterwards, without knowing what/when the problem was in
14 not feasible. While I'm happy to help out with this in
15 the short term, I think I'm being pulled much further
16 into this than I should be. So someone is going to have
17 to work out what Security's approach to this is. In the
18 meantime perhaps we should continue to check the lock
19 events since those are the ones which [need to] have
20 been proved to be associated with a financial problem in
21 a handful of cases."

22 Were you aware of concerns on the part of Anne
23 Chambers in respect of what was being asked of her?

24 **A.** I wasn't aware of this email, no.

25 **Q.** No. I mean, it was sent to you, if we look at the top,
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1 We're now in January 2009 and Wendy Warham sends
2 a message. If we look at the top email from Penny
3 Thomas to Dave Posnett, she says:

4 "Please see note sent by my senior management this
5 morning. We need to discuss urgently."

6 If we scroll down, we can see this note. This is
7 a note being sent from Wendy Warham to people at the
8 Post Office, so to counterparts at the Post Office. Are
9 you aware of any of those names at all?

10 **A.** Yes, yes.

11 **Q.** Penny Thomas appears to be concerned by the contents of
12 this. She says as follows:

13 "Sue I have left you a voicemail as I need to update
14 you on a recent issue that has occurred and been
15 resolved but does have some short-term impacts. In
16 summary the issue is as follows:

17 "In December 2007 an occurrence was reported in one
18 office where a stock unit rollover coincided with the
19 end of day process running. This led to a previously
20 unseen database lock where an administrative balancing
21 transaction failed to be written to the local message
22 store database. This generated a generic and
23 non-specific software error event which went unnoticed
24 in the monitoring of events. A financial imbalance was
25 evident and was subject to investigation by Fujitsu's
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1 "Anne's comments need to be part of our discussion
2 tomorrow". Do you recall any significant discussion?

3 **A.** I don't, but there are a number of names on there.

4 **Q.** Can we look at FUJ00155394, and it's the first page. It
5 says as follows -- it's from you to -- who is David
6 Hinde?

7 **A.** I don't remember.

8 **Q.** "David

9 "The slides were presented to Steve Denham on behalf
10 of Wendy Wednesday afternoon. He is now aware of the
11 problem and is going to talk with Legal. In the
12 meantime we will be progressing with the [change
13 proposal]."

14 So it seems as though Wendy wasn't available or
15 didn't attend; do you recall what happened?

16 **A.** No.

17 **Q.** No?

18 **A.** No.

19 **Q.** Steve Denham received that PowerPoint presentation.

20 **A.** It looks like it. I think he was the Customer Services
21 Director.

22 **Q.** Thank you. Can we, please, look now at FUJ00155399.
23 I'm just going to take you to two documents before we
24 break for lunch. We'll go shortly after lunch but not
25 too much over.
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1 Service Support Centre and Post Office Limited. The
2 financial imbalance has been resolved.

3 "A software correction was applied across the estate
4 in early November 2008 to ensure that any such event
5 generated would be monitored. Testing of that
6 correction has established that the unmonitored error
7 does not occur elsewhere in the system."

8 Just pausing there, this seems to be a senior level
9 email from Fujitsu to the Post Office informing them of
10 the problem that we've been looking at for much of
11 today.

12 **A.** Yes, sir.

13 **Q.** Yes? The event occurred in December 2007 but it's taken
14 until 7 January 2009 to provide that high level
15 confirmation; do you agree with that?

16 **A.** Yes.

17 **Q.** Yes?

18 **A.** Yes.

19 **Q.** "Impact

20 "We need to work with the Post Office to recheck the
21 ARQs and reconfirm the data integrity during the period
22 of May 2007 to November 2008 -- Penny will do this."

23 Now, we are looking at a much shorter period.
24 I think we discussed this earlier today: we were
25 originally looking at a review of five and a half years
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1 worth of data but, by this stage, it seems as though the
 2 period for checking was May 2007 to November 2008?
 3 **A.** Yes.
 4 **Q.** "We need to discuss how we close the issue on the
 5 witness statements and we have some words which may be
 6 appropriate -- Both need to discuss and agree the words.
 7 "Identify which witness statement we have supplied
 8 and are still awaiting court to confirm whether or not
 9 the data provided was May 2007 to November 2008 to (a)
 10 ensure events have been checked and (b) to recall and
 11 replace witness statements ..."
 12 It says "POL/Penny", so the Post Office or Penny
 13 seem to be tasked with that particular task?
 14 **A.** Yes, they'd worked together on it, yes.
 15 **Q.** "Further Action
 16 "Automate the message store alerts on the system so
 17 that no manual intervention is required -- A [change
 18 proposal] has been raised for this work.
 19 "Education to ensure that this type of incident is
 20 raised as a major incident in the security stack so that
 21 we can communicate and manage this in accordance with
 22 incident timescales.
 23 "Apologies that this has not been communicated
 24 earlier but the review of security incidents should
 25 improve this issue."

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1 worked out and come up with a solution to notify the
 2 Post Office, rather than keeping the Post Office abreast
 3 of what was going on throughout?
 4 **A.** In this case, yes, this is what happened.
 5 **Q.** Did you personally see it as important to protect the
 6 name of Fujitsu?
 7 **A.** Not really. I think it was more a concern to find out
 8 what the problem was but --
 9 **Q.** But your general approach to your work, did you see it
 10 as important to your work to protect the name of
 11 Fujitsu?
 12 **A.** To protect the ARQ service.
 13 **Q.** Not protect Fujitsu's overall reputation?
 14 **A.** I think it was more to find out what the problem was
 15 with the ARQ.
 16 **Q.** But my question is, did you see it as important to your
 17 work to protect the name of Fujitsu?
 18 **A.** I guess I did, but not purposely.
 19 **Q.** Not?
 20 **A.** Not purposely trying to protect Fujitsu's name.
 21 **Q.** What do you mean by that?
 22 **A.** I was really concerned with finding out what the --
 23 where the error was and what it was and how we correct
 24 it.
 25 **Q.** So it would be unfair to describe you as somebody who

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1 The impression that's given by this email is very
 2 much that it was a one-off incident from 2007; would you
 3 agree with that?
 4 **A.** I would, yes.
 5 **Q.** Yes. There's no mention of, for example, Gerald Barnes'
 6 concerns that we saw in that PEAK of wider problems with
 7 the coding, for example?
 8 **A.** Yeah, I don't understand Gerald Barnes' level of detail.
 9 **Q.** No, but there is no mention in this notification of
 10 wider concerns of issues that may affect subpostmasters
 11 without the subpostmasters realising, for example?
 12 **A.** Yeah, I don't really know. I think Wendy is talking
 13 about this particular issue.
 14 **Q.** Focusing on the 2007 incident --
 15 **A.** Yes, sir.
 16 **Q.** -- there's no mention of the kinds of wider concerns
 17 that we have been discussing today.
 18 **A.** Not in this, no.
 19 **Q.** No. Why did Fujitsu hang onto it from 2007 to 2009
 20 before having this high level discussion with the Post
 21 Office?
 22 **A.** I think there was a fair period of time when nobody
 23 actually knew what the problem was and it took a fair
 24 bit of investigation to find it.
 25 **Q.** Was it standard for Fujitsu to wait until they had

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1 saw protecting Fujitsu as an important part of their
 2 job?
 3 **A.** We all protect our own companies, yes.
 4 **Q.** One final document before the break. If we go to
 5 FUJ00154750. We're going back in time now to 2006 but
 6 this is an email from you to Andy Dunks --
 7 **A.** Yeah.
 8 **Q.** -- and it relates to the Lee Castleton trial.
 9 **A.** Yeah.
 10 **Q.** That's a case that we've seen a lot of in this Inquiry:
 11 "See you in court then, Fetters Lane is where they
 12 used to hang people out to dry. I don't suppose that
 13 type of thing happens any more though.
 14 "That Castleton is a nasty chap and will be out to
 15 rubbish the [Fujitsu] name, it's up to you to maintain
 16 absolute strength and integrity no matter what the
 17 prosecution will throw at you. WE will all be behind
 18 you hoping you come through unscathed. Bless You."
 19 Is that typical of your approach to the work you
 20 were doing?
 21 **A.** No, no. I don't know why that was written.
 22 **Q.** Does that help explain some of the work that --
 23 **A.** I don't know why it was written.
 24 **Q.** -- we've seen today?
 25 **A.** I don't know why it was written. I don't remember

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1 writing it but obviously I did. But certainly don't
2 understand it.
3 **MR BLAKE:** Sir, might that be an appropriate moment to break
4 for lunch? I don't have that many questions. I have,
5 I would say, ten minutes, ten to 15 minutes. There will
6 be some questions from Core Participants.

7 The next witness won't be longer than one hour, I am
8 told, so we will finish comfortably today.

9 **SIR WYN WILLIAMS:** All right. Very good, so we'll begin
10 again at, what, 2.00?

11 **MR BLAKE:** 2.00.

12 **SIR WYN WILLIAMS:** Yes, fine.

13 **MR BLAKE:** Thank you very much.

14 (1.02 pm)

(The Short Adjournment)

16 (2.00 pm)

17 **MR BLAKE:** Good afternoon, sir, can you see and hear me?

18 **SIR WYN WILLIAMS:** Yes, I can, thank you.

19 **MR BLAKE:** Thank you very much.

20 Can we start this afternoon with FUJ00155400. Thank
21 you very much.

22 Mr Sewell, before the break, we were looking at the
23 minutes of a meeting. I'm just going to turn back to
24 those in my own bundle. So we were looking at an email
25 that was sent from Wendy Warham to the Post Office on

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1 "1) The following addition has been inserted ...
2 This addition seems okay (it's just another check that
3 Fujitsu conduct -- to ensure the 'security incident'
4 doesn't occur again)."

5 Then it quotes the proposed addition to the witness
6 statement, that simply says:

7 "Windows Events generated by the counters within the
8 branch/time frame in question are checked to ensure the
9 counters were functioning correctly."

10 Then it says as follows:

11 "The following additional paragraphs have been
12 inserted ... I personally do not see the need for these,
13 if there are no problems identified with the data
14 relating to the case in question. Why inform anyone
15 about a problem we've had within the network, but
16 possibly only at one branch, if it bears no relation or
17 relevance."

18 The proposed passages for insertion in the witness
19 statement were as follows, they say:

20 "In December 2007 an occurrence was reported in one
21 office where a stock unit rollover coincided with the
22 end of day process running. This led to a previously
23 unseen database lock where an administrative balancing
24 transaction failed to be written to the local message
25 store database. This generated a generic and

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1 7 January 2009.

2 **A.** Yes.

3 **Q.** We're now on 8 January 2009 and, if we look at the
4 bottom, it's an email from Penny Thomas to Wendy Warham
5 and Steve Denham, you're copied in, and it says:

6 "Please see email trail.

7 "The Post Office clearly don't want the specific
8 details of this incident included in the witness
9 statement.

10 "I will hold off providing the 4 outstanding
11 statements until our review is complete."

12 Then behind that we can see the discussion that has
13 taken place. Perhaps we can start at the bottom of
14 page 2 into page 3, please. So we have an email at the
15 very bottom from Rob Wilson to -- sorry, to Rob Wilson
16 from Dave Posnett, and that says --

17 **A.** Other way round.

18 **Q.** Pardon?

19 **A.** The other way round, isn't it?

20 **Q.** Yes, if we scroll down, it's to Rob Wilson from Dave
21 Posnett?

22 **A.** Yeah, okay.

23 **Q.** He says:

24 "In relation to the standard witness statement
25 Fujitsu provide:

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1 non-specific software error event which went unnoticed
2 in the monitoring of events. A financial imbalance was
3 evident and was subject to investigation by Fujitsu's
4 Service Support Centre and Post Office Limited. The
5 financial imbalance has been resolved.

6 "A software correction was applied across the estate
7 in early November 2008 to ensure that any such event
8 generated would be monitored. Testing of that
9 correction has established that the unmonitored error
10 does not occur elsewhere in the system."

11 So that was the proposed form of words in the
12 statement, which Mr Posnett was saying he didn't
13 consider the need for; is that your reading of that?

14 **A.** Yes. Yes, sir.

15 **Q.** It continues:

16 "Fujitsu have 4 statements outstanding and I'd be
17 grateful if you could consider the above (ie should they
18 include the above in statements from now on?). Happy to
19 discuss if need be."

20 The response is on the previous page, from Rob
21 Wilson, the Head of Criminal Law at the Post Office. He
22 says:

23 "Dave,

24 "Thanks for both of your emails. So far as the
25 addition is concerned my view is that if we are sure

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1 that there are no incidents then there is nothing
2 undermining that will need to be flagged up to the
3 dense. The incident will have no relevance to our cases
4 and as such could only lead to fishing expeditions if we
5 added anything into the standard statement."

6 If we look above, we have the email from Dave
7 Posnett to Penny Thomas. He says:

8 "Penny,

9 "To note emails below.

10 "I would say Business As Usual regarding witness
11 statements ie don't include the two additional
12 paragraphs on the last page.

13 "If any issues materialise in due course, we can
14 address then -- suggest the ARQs for these 4 cases are
15 assessed first."

16 Over the page, please, to the first page. We then
17 have Penny Thomas emailing you that we've seen on the
18 first page, saying that the Post Office don't want the
19 details included in the witness statement.

20 Was that something that you recall discussion taking
21 place?

22 **A.** Well, I've read the paperwork and, obviously, I've
23 picked up on it through reading the paperwork, yes.

24 **Q.** But it's not something that stood out at the time?

25 **A.** No.

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1 think those should have been brought to people's
2 attention, defendants in criminal proceedings?

3 **A.** Then or now?

4 **Q.** Do you think now they should have?

5 **A.** Maybe, yes.

6 **Q.** Yes. Reflecting on that, do you think that, even this
7 proposed changed form of words would have been
8 sufficient to have reflected those wider issues?

9 **A.** I don't know, I think it's -- I really didn't have
10 an opinion at the time. I was happy to go with the flow
11 that was generally released.

12 **Q.** Can we please look at FUJ00155402. On the same day --
13 we're sticking with the 8 January 2009 -- there seems to
14 have been another meeting. We have the bottom email
15 from Penny Thomas, you're a recipient, and she says:

16 "As a result of our meeting today the following
17 actions have been agreed:

18 "We will event check all transaction data supplied
19 to the Post Office where that data falls between May
20 2007 and November 2008."

21 So there's a narrow limitation in the time period
22 for which the data is being selected.

23 **A.** That was the time, that was the -- when the events
24 were -- potentially had an error in them. That's when
25 the correction was corrected in November, and was found

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1 **Q.** If we look at FUJ00122604, we see the amendments to the
2 statement that Penny Thomas proposed. If we go to
3 page 7, please, we can see that's the form of words that
4 she was proposing that generated that email chain that
5 we've just been looking at. It seems as though those
6 proposals were rejected. Are you able to offer a view
7 as to whether you think that they were even sufficient
8 in themselves? In other words, referring only to the
9 December 2007 occurrence, rather than the wider issues
10 that we were discussing this morning.

11 **A.** I don't know, really. They're relevant to the Post
12 Office, they issued that statement and the legal people
13 absorbed it and said they're okay with it.

14 **Q.** But, as somebody who was managing Penny Thomas, the
15 author of this statement, we know that that wasn't
16 included but, even if it were included, do you think
17 that would have adequately addressed all of the problems
18 that we've been discussing today --

19 **A.** I don't know.

20 **Q.** -- the wider issues with, for example, subpostmasters
21 not being aware of a potential problem that causes
22 an imbalance?

23 **A.** Well, that particular problem was resolved.

24 **Q.** Yes, but do you think the potential for that to occur
25 and the underlying code issues, for example, do you

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1 in May.

2 **Q.** But you'll recall from earlier this morning, discussion
3 earlier on about looking at a much wider period --

4 **A.** I don't know when that was stopped. Sorry, I --

5 **Q.** Yes, you don't know when that was stopped but it seems
6 January 2009, the decision is taken to only look at
7 a narrow period of time.

8 **A.** Yes.

9 **Q.** "The check will focus on events where the CABSPProcess
10 has produced a lock from 1900 to 1910 local time."

11 So, again, quite narrow in the time period also that
12 they're looking, not just by date but also by time of
13 event?

14 **A.** It might have been because that was when the process --
15 the end-of-day process was run.

16 **Q.** Absolutely. So it was only looking at that end-of-day
17 process, rather than any other triggers for that
18 event --

19 **A.** Yes.

20 **Q.** -- or potential triggers?

21 **A.** Looks like it, yes.

22 **Q.** "Penny to provide a list of 195 outlets with time frame.

23 "Alan to provide query.

24 "Gerald to run event check through the database.

25 "Steve Denham is to be advised the number of

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1 residual events and will custody with Mik Peach.
 2 "Residual events to be reviewed.
 3 "Penny (or cover) will check ARQ data retained in
 4 the audit room or retrieve message stores as required.
 5 "Pete to update security incident register."
 6 Is that "Pete" a reference to you?
 7 **A.** I think it is, yes.
 8 **Q.** Can you help us with what the security incident register
 9 was?
 10 **A.** Really a spreadsheet with a record of incidents,
 11 security incidents.
 12 **Q.** Now, our final document is FUJ00155421. This is
 13 an email that we saw yesterday. It's 4 February 2009
 14 from Penny Thomas to Dave Posnett at the Post Office.
 15 You are sent a copy of the email shortly after -- in
 16 fact, the same minute as it's sent, forwarded for your
 17 information. I'm just going to read that, it says:
 18 "We are pleased to advise that our analysis covering
 19 1 May 2007 to 30 November 2008 has been completed.
 20 "The events logs have been checked for all data
 21 provided to [the Post Office] as a result of the 195
 22 ARQs which fall within the time frame."
 23 So it seems as though they checked 195 ARQs?
 24 **A.** Yes.
 25 **Q.** "A total of 27 instances of concern were identified.
 121

1 you think that, as at 4 February 2009, sufficient had
 2 been done within Fujitsu?
 3 **A.** At the time, yes.
 4 **Q.** And now?
 5 **A.** Maybe not.
 6 **Q.** Maybe not?
 7 **A.** Maybe not.
 8 **Q.** Do you have any reflections on that?
 9 **A.** No, not really, it's such a long time ago for me.
 10 **Q.** Thank you.
 11 I only have one very brief topic raised by a Core
 12 Participant and that relates to paragraph 14 of your
 13 witness statement. Perhaps we can go to that,
 14 WITN09710100. It's paragraph 14, page 5. Thank you.
 15 There's just a reference there. It says that:
 16 "I had contact with Sue Lowther, the Post Office
 17 Security Manager. I had detailed knowledge of the
 18 Horizon project, including the relevant people, their
 19 roles and where to find information, and so would attend
 20 security meetings between managers Bill Mitchell (later,
 21 Brian Pinder) in the [Post Office Account] Security Team
 22 and [it says] POL Security Team on a monthly basis to
 23 provide support."
 24 Are you able to assist us, was that the Post Office
 25 Security Team or was it the Post Office Investigations
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1 All instances have been fully analysed and we can
 2 confirm that the locking was caused by contention
 3 between the [end-of-day] process and a Riposte
 4 checkpoint being written. No transactions or balancing
 5 activities carried out at the branches were affected.
 6 "A [change proposal] has been raised to automate the
 7 event checking process and is being progressed.
 8 "The standard witness statement has been reviewed,
 9 and is attached. No reference has been made to the
 10 locking issue but minor revisions have been made."
 11 So, in essence, the part that the Post Office
 12 earlier rejected in that email chain we saw wasn't
 13 ultimately included?
 14 **A.** Yes, looks like it, yes.
 15 **Q.** "The 4 (now 3) outstanding witness statements will be
 16 provided as soon as possible.
 17 "Please respond or call me if you have any
 18 questions."
 19 That seems to be the end of the matter, drawing to
 20 a close the issue that we've been looking at.
 21 **A.** Yes, it does.
 22 **Q.** Do you think that the issue was adequately addressed, in
 23 the sense that we heard from the beginning of today
 24 possibility for silent errors occurring that may affect
 25 transactions, that weren't known to subpostmasters. Do
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1 Team?
 2 **A.** It was the Post Office Security Team.
 3 **Q.** Who do you recall attending those meetings?
 4 **A.** Sue Lowther, she was the Post Office Manager -- Security
 5 Manager. I can't remember anyone else.
 6 **MR BLAKE:** Thank you very much, Mr Sewell.
 7 Sir, there are questions from Ms Patrick and
 8 Ms Page. I believe that is all.
 9 I think we're going to hear from Ms Page first.
 10 **SIR WYN WILLIAMS:** Thank you.
 11 **Questioned by MS PAGE**
 12 **MS PAGE:** Mr Sewell, I understand from your evidence
 13 earlier -- and correct me if I'm wrong -- that you say
 14 you were not aware that subpostmasters were saying that
 15 Horizon was causing balancing problems?
 16 **A.** I was not aware.
 17 **Q.** Can we go, please, to POL00118221, it's a long document,
 18 and if we could go to page 220, please. This document
 19 is dated 4 July 2003, and we can see that it's to
 20 someone called Kevin Parkin and it's from someone called
 21 Reg Barton but it's copied to you, do you see that,
 22 Peter Sewell?
 23 **A.** Yes, I do.
 24 **Q.** This relates to the case of Cleveleys --
 25 **A.** Mm-hm.
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1 Q. -- which this Inquiry has heard a bit about, and it
 2 says:
 3 "I understand from Denise that POL have been raising
 4 some questions about Cleveleys SPSO, where I understand
 5 that the postmaster is in possession of (??) sets of
 6 Horizon equipment dating back since 2001, which she
 7 maintains were responsible for poor balancing."
 8 If we go down a little bit, it says in the
 9 paragraph, which begins "I have", which is towards the
 10 bottom of the screen:
 11 "I have copied this to Peter Sewell, our Security
 12 Manager, for his awareness ..."
 13 Now, that tells us that right from 2003 you were
 14 aware of subpostmasters saying that Horizon equipment
 15 was responsible for problems with balancing.
 16 A. That was 2003.
 17 Q. Well, that was just at the start, wasn't it, and it
 18 carried on from there, didn't it?
 19 A. I wasn't Security Manager either, 2003.
 20 Q. Well, it's being sent to you as Security Manager,
 21 whether or not that was your correct title at that time,
 22 you were being put on notice, were you not, that
 23 a subpostmaster was complaining that Horizon equipment
 24 was causing misbalancing?
 25 A. I can read it and it says that, yes. But I wasn't --
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1 again, FUJ00154750. Your email to Mr Dunks:
 2 "See you in Court then, Fetter Lane is where they
 3 used to have people out to dry. I don't suppose that
 4 type of thing happens any more though.
 5 "That Castleton is a nasty chap and will be out to
 6 rubbish the [FJ] name, it's up to you to maintain
 7 absolutely strength and integrity no matter what the
 8 prosecution throw at you. WE will all be behind you
 9 hoping you come through unscathed. Bless You."
 10 Let's just have a look at his reply as well, please:
 11 "Thank you for those very kind and encouraging
 12 words, I had to pause halfway through reading it to wipe
 13 away a small tear ...
 14 "Bless you all ..."
 15 Thank you. That can come down. Was this your pep
 16 talk to your team member that you were managing before
 17 he had to go and give evidence?
 18 A. No, it wasn't a pep talk, no.
 19 Q. You're saying, "Don't worry, we're all behind you",
 20 aren't you?
 21 A. That's what it says.
 22 Q. What you say to reassure him is "Don't worry, he's
 23 a nasty man". How did you form that opinion, Mr Sewell?
 24 A. I don't know. I don't know why I wrote it.
 25 I apologise.
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1 I don't remember it. It was too long ago.
 2 Q. Thank you. That document can come down.
 3 The Castleton email that was put on screen just
 4 before lunch, let's consider a different aspect of it,
 5 please. You've been at pains to tell us that you were
 6 not involved in the technical detail of what your team
 7 did and, instead, you wished us to focus on the fact
 8 that you were their manager.
 9 A. Right.
 10 Q. Team meetings, appraisals, that kind of thing.
 11 A. Yes.
 12 Q. Now, providing witness statements was part of their job,
 13 wasn't it, and you knew that?
 14 A. Yes.
 15 Q. Therefore, giving evidence in court proceedings would
 16 potentially be part of their job, would it not?
 17 A. Yes, when necessary, yes.
 18 Q. So it might be more rare and a more difficult part of
 19 their job but still something anticipated, expected,
 20 something you knew you would have to be responsible for
 21 managing them to do?
 22 A. I guess so. I'm not sure I was that committed to it but
 23 I knew what they were doing. I knew where they were
 24 going.
 25 Q. All right. Well, let's have a look at the email chain
 126

1 Q. What was being said within Fujitsu that allowed you to
 2 form the opinion that he was a nasty man?
 3 A. Nothing, I don't think.
 4 Q. Nothing?
 5 A. Not aware of anything, no.
 6 Q. You made that up off the top of your head?
 7 A. In a way, I think, yes.
 8 Q. Why would you do that, Mr Sewell?
 9 A. I don't know.
 10 Q. Is that the opinion that you formed of all
 11 subpostmasters who took issue with what Post Office said
 12 in the courts?
 13 A. Absolutely not.
 14 Q. You were egging Mr Dunks on, weren't you, urging him to
 15 go into battle with Mr Castleton, weren't you?
 16 A. I don't know what it was written for now. I don't know.
 17 Q. You will know by now that Mr Castleton was indeed hung
 18 out to dry.
 19 A. I know a lot more about it now than I did. Yes.
 20 Q. Knowing what you know about him being hung out to dry,
 21 and the way that you urged Mr Dunks to go into battle
 22 with him, is that the right attitude for someone to take
 23 into court when they're about to give evidence in a case
 24 with serious implications for someone?
 25 A. No.
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- 1 **Q.** Yet that was the attitude that your management style and
2 your email fostered and encouraged, isn't it?
3 **A.** It suggests that way, yes. I didn't -- I don't know why
4 I wrote it.
5 **Q.** Did you say similar things to Mr Dunks before he gave
6 evidence against Seema Misra?
7 **A.** Absolutely not.
8 **Q.** Why do you say "Absolutely not"?
9 **A.** I can't even believe that that was written, so no.
10 **Q.** Well, if you can't believe you wrote that, and clearly
11 you did, is it not entirely possible that you said
12 similar things before he gave evidence against
13 Mrs Misra?
14 **A.** No.
15 **Q.** No?
16 **A.** I didn't.
17 **Q.** You didn't?
18 **A.** I didn't.
19 **Q.** Why are we to believe that, Mr Sewell?
20 **A.** That's what I'm saying to you.
21 **Q.** The attitude towards subpostmasters that you encouraged
22 in your team must have been one they carried into court
23 whenever they gave evidence against subpostmasters; is
24 that right?
25 **A.** I don't believe so.

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1 His conviction was overturned in October 2021, 11 years
2 later. So that's a little bit of context.
3 Now, if we read what Mr Budd is saying first,
4 together:
5 "Morning Andy,
6 "That court case reared its head again a few weeks
7 ago. You remember I analysed a couple of counters back
8 in July '07 then you got me to sign a new witness
9 statement in June '08, well they came back again and
10 wanted me to sign another one -- just a single paragraph
11 to say that the counters were in 'full working order and
12 would not cause a discrepancy'. I was not happy with
13 the implications of 'full working order' since I did not
14 perform test transactions on the counters so I provided
15 a new paragraph to reiterate my previous statement --
16 that the files thereon were correct and that the
17 counters should be expected to perform as required.
18 "The reason for my email, now the defence are hiring
19 an expert to analyse the equipment I just wanted to make
20 sure POA are not solely relying on my analysis --
21 I assume we have supplied evidence of the transactions
22 going through and the systems working correctly? I am
23 just trying to reduce the stress I feel whenever this
24 pops back into my head!"

25 So that's what he is saying. Now, Phil Budd: do you

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- 1 **MS PAGE:** Thank you, Mr Sewell. Those are my questions.
2 **SIR WYN WILLIAMS:** Thank you, Ms Page. Ms Patrick?
3 **Questioned by MS PATRICK**
4 **MS PATRICK:** Good afternoon, Mr Sewell.
5 **A.** Good afternoon.
6 **Q.** My name is Ms Patrick, I ask questions for a number of
7 subpostmasters who were convicted and have since had
8 their convictions overturned.
9 **A.** Right.
10 **Q.** I only want to ask you a few questions about one topic.
11 This morning you told the Inquiry that you'd had
12 limited input into the substantive content of witness
13 statements provided by Fujitsu employees, including
14 those people you managed; is that right?
15 **A.** Yes.
16 **Q.** Okay. I want to look at one document, FUJ00225644. If
17 we could focus on the email at the bottom of the page on
18 page 1, please. Can you see that there, Mr Sewell?
19 **A.** Yes.
20 **Q.** We see that this is a message from Phil Budd, it's dated
21 18 August 2009, and it concerns Porters Avenue Post
22 Office. Now, Porters Avenue is a branch run that was
23 run by Jerry Hosi, who is a subpostmaster that we
24 represent. Mr Hosi was prosecuted and convicted and, in
25 November 2010, he was sentenced to 21 months in prison.

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1 recall who Phil Budd was?
2 **A.** No.
3 **Q.** If we scroll back down on to page 2 of that document, we
4 might be able to refresh your memory. If we look at the
5 very top, we'll see his email signature. There you go,
6 Phil Budd, RMGA, Development Systems Engineer. Does
7 that help?
8 **A.** No, don't recall the name at all.
9 **Q.** Okay, but in this message Mr Budd is expressing
10 a reluctance about the evidence he's given and will have
11 to give in court, isn't he?
12 **A.** Yes.
13 **Q.** Right. Can we scroll back to the top of page 1, please.
14 If we can highlight the top of page 1, I'd be grateful.
15 We see here there's a reply from you, isn't there,
16 Mr Sewell?
17 **A.** To Andy Dunks, yes.
18 **Q.** It's copied to Mr Budd, isn't it?
19 **A.** Yes.
20 **Q.** You say:
21 "Phil
22 "Your statement is fine and all you can actually
23 say. If they stump up the cash the counter equipment
24 can won't [I think that might be 'can't'] be much use as
25 the 42 days retainer of the message store is long gone,

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1 and will be endorsed by Gareth.
 2 "Pete."
 3 You were signing off what Mr Budd had already said
 4 in evidence, weren't you?
 5 **A.** I was trying to reply to him.
 6 **Q.** You were giving him assurance that it was appropriate
 7 for him to go on and give evidence, weren't you?
 8 **A.** That's all I knew, that the message store would run.
 9 **Q.** In fact, what you were doing was commenting on a line
 10 that was being taken by the defence in this case,
 11 weren't you?
 12 **A.** I don't know about that.
 13 **Q.** Here, I think you were suggesting, in fact, that
 14 Mr Jenkins, if it was necessary, then he would be able
 15 to give evidence to provide a fuller picture; is that
 16 fair?
 17 **A.** No, I think I was asking that Gareth would underline
 18 what I was saying, so I was correct.
 19 **Q.** That he would endorse --
 20 **A.** What I was saying.
 21 **Q.** -- what you were saying?
 22 **A.** Yes.
 23 **MS PATRICK:** Thank you. I don't think I have any further
 24 questions for you, Mr Sewell.
 25 **SIR WYN WILLIAMS:** Is that it?
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1 You should have in front of you a hard copy of
 2 a witness statement in your name in a bundle at tab A1,
 3 and it is dated 29 December 2023; do you have that?
 4 **A.** I do.
 5 **Q.** If you could turn to page 12 of that, please. Do you
 6 have a copy with a visible signature?
 7 **A.** I do, yes.
 8 **Q.** Is that your signature?
 9 **A.** It is.
 10 **Q.** Are the contents of your statement true to the best of
 11 your knowledge and belief?
 12 **A.** They are.
 13 **Q.** For the purposes of the transcript, the reference for
 14 Ms Munro's statement is WITN06850100. I will not be
 15 asking you about every aspect of the statement that you
 16 have provided, which will be published on the Inquiry's
 17 website in due course, I will instead be asking about
 18 certain specific issues which are addressed in them?
 19 **A.** Okay.
 20 **Q.** Based on the documents you have seen, is it right that
 21 you think you must have started working for Fujitsu
 22 Services by at least December 2000?
 23 **A.** Yes, that's correct.
 24 **Q.** Your first role with Fujitsu was as a technician in the
 25 Royal Mail Group Account Team at the Systems Management
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1 **MR BLAKE:** That is, sir, yes.
 2 **SIR WYN WILLIAMS:** Well, thank you, Mr Sewell, for coming to
 3 give evidence today.
 4 We've got one more witness, Mr Blake?
 5 **MR BLAKE:** We do, sir, yes, could we take our mid-afternoon
 6 break now, so 15 minutes, so that arrangements can be
 7 put in place for Ms Munro to take her place in the room.
 8 So that will be 2.45.
 9 **SIR WYN WILLIAMS:** Certainly. All right. Thank you.
 10 **MR BLAKE:** Thank you very much.
 11 **(2.30 pm)**
 12 **(A short break)**
 13 **(2.45 pm)**
 14 **MS PRICE:** Good afternoon, sir, can you see and hear us?
 15 **SIR WYN WILLIAMS:** Yes, thank you very much.
 16 **MS PRICE:** May we please call Ms Munro.
 17 **SIR WYN WILLIAMS:** Mm-hm.
 18 **DONNA MARIA MUNRO (affirmed)**
 19 **Questioned by MS PRICE**
 20 **MS PRICE:** Could you confirm your full name, please,
 21 Ms Munro?
 22 **A.** Yeah, Donna Maria Munro.
 23 **Q.** Thank you for coming to the Inquiry to assist it in its
 24 work. As you know, I will be asking you questions on
 25 behalf of the Inquiry.
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1 Centre; is that right?
 2 **A.** That's correct.
 3 **Q.** You were part of the team that was responsible for
 4 monitoring the rollout of the Horizon system through the
 5 management of calls from Post Office branches in
 6 relation to the remote upgrades deployed to Horizon
 7 counters; is that right?
 8 **A.** That's right.
 9 **Q.** That involved ensuring that Horizon counters in specific
 10 offices were deployed or rolled back on time?
 11 **A.** Yes.
 12 **Q.** You say at paragraph 6 of your statement that, if any
 13 issue arose, you would refer to a Known Error Log, the
 14 Software Support Centre or the Management Systems
 15 Support to resolve the issue?
 16 **A.** Yes.
 17 **Q.** Do you recall the kind of issues which were being
 18 reported to you at this time?
 19 **A.** I don't recall the detail of the issues, no.
 20 Specifically, I remember when we were doing the rollouts
 21 that if we hadn't got every counter in an office, with
 22 the software upgrade, it had to all be rolled back
 23 before their start of business day, the following
 24 morning, and then other -- it was general event
 25 monitoring, so the events that are coming back from the
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1 counters, and things like that.

2 **Q.** If you can just keep your voice up a little bit so the
3 transcriber can hear you.

4 **A.** Okay.

5 **Q.** Is it right that you recall the architects of the
6 Horizon system, Ian Bowen and Glenn Stephens, assisting
7 with the team's technical knowledge and understanding of
8 the solutions used for issues raised?

9 **A.** Yes. I'm not sure that they were specifically the
10 architects of the Horizon system, but as part of it. So
11 not the whole system.

12 **Q.** I'm taking that wording from your statement: you mean
13 that part of the system?

14 **A.** That they were architects of the part of the system, not
15 the whole system.

16 **Q.** You became a Team Leader in the Systems Management
17 Centre; is that right?

18 **A.** That's correct.

19 **Q.** Then left the RMG Account Team to support different
20 projects across the Fujitsu business?

21 **A.** Yes.

22 **Q.** In June 2009, you were offered the role of Security
23 Operations Manager in Fujitsu's Post Office Account
24 Team; is that right?

25 **A.** That's correct.

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1 reconcile against the reports to -- the different
2 reports to which transactions were correct or incorrect
3 and needed additional work.

4 **Q.** Were you ever involved in the work of the reconciliation
5 services team, as opposed to reviewing the service?

6 **A.** No.

7 **Q.** One aspect of the Security Team's work was the
8 Litigation Support Service, which was offered to the
9 Post Office, wasn't it?

10 **A.** Correct.

11 **Q.** You say at paragraph 13 of your statement that you were
12 also responsible for the management of the Security
13 Team, including sickness, leave, and performance
14 monitoring and workload distributions?

15 **A.** Correct.

16 **Q.** You say at paragraph 14 of your statement that in your
17 day-to-day work you reported directly to Peter Thompson;
18 is that right?

19 **A.** That's correct.

20 **Q.** You also maintained a working relationship with the CISO
21 and would reach out to him with questions relating to
22 the more technical and security matters of the work of
23 the Security Team?

24 **A.** Yes.

25 **Q.** From 2012, your focus moved to supporting the Payment

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1 **Q.** You say at paragraph 9 of your statement that you did
2 not have much experience within security at the start of
3 your role, and you raised this with the Post Office
4 Account Manager Peter Thompson; is that right?

5 **A.** That's correct.

6 **Q.** He and the Chief Information Security Officer offered
7 support throughout your role?

8 **A.** They did, yes.

9 **Q.** You say in your statement that the Chief Information
10 Security Officer role was held by a number of
11 individuals across the time you were with the Post
12 Office Account, including Tom Lillywhite, Howard
13 Pritchard and Brad Warren; is that right?

14 **A.** Yes.

15 **Q.** You say that on joining the Post Office Account your
16 main focus was on gaining an understanding of how the
17 teams worked?

18 **A.** Yes, that's correct.

19 **Q.** You reviewed a number of services provided by the
20 Security Team; is that right?

21 **A.** I did.

22 **Q.** That included reconciliation services; can you explain,
23 please, what reconciliation services were?

24 **A.** That's where they take the reports from overnight where
25 transactions haven't settled correctly and they

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1 Card Industry Data Security Standards compliance
2 programme; is that right?

3 **A.** That's correct.

4 **Q.** Although you say you still had oversight of the Security
5 Team at that time?

6 **A.** Yes.

7 **Q.** Is it right that you left Fujitsu in 2015?

8 **A.** That's correct.

9 **Q.** When you were Security Operations Manager, you line
10 managed Penny Thomas; is that right?

11 **A.** That's correct.

12 **Q.** You describe her at paragraph 17 of your statement as
13 the subject matter expert responsible for the management
14 and carrying out of the extraction of audit data?

15 **A.** Yes.

16 **Q.** She was responsible for the provision of the Litigation
17 Support Service and supported the Reconciliation
18 Service; is that right?

19 **A.** She did.

20 **Q.** Penny Thomas was supported in this role by Andy Dunks,
21 when you joined the Post Office Account; is that right?

22 **A.** That's correct.

23 **Q.** Rajbinder Bains joined the team a few months later?

24 **A.** She did, yes.

25 **Q.** You say in your statement she was supported as and when

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1 necessary, that is Penny Thomas, by the Software Support
2 Centre, including Anne Chambers, as well as by Gareth
3 Jenkins; is that right?

4 **A.** Yes.

5 **Q.** You say at paragraph 21 of your statement that you
6 believe Gareth Jenkins was a Senior Solution Architect
7 for the Horizon system and you say he assisted Penny
8 Thomas in understanding the ARQ data she retrieved as
9 part of the Litigation Support Service; is that right?

10 **A.** Correct.

11 **Q.** You say you had fairly limited dealings with Gareth
12 Jenkins and that you saw him on rare occasion, briefly
13 saying hello around the office; is that right?

14 **A.** That's correct.

15 **Q.** But your understanding, from these limited dealings, was
16 that he was, on occasion, called as an expert witness in
17 prosecutions conducted by the Post Office?

18 **A.** Yes.

19 **Q.** You say at paragraph 20 of your statement that it was
20 Penny Thomas who provided training to Andy Dunks and
21 Rajbinder Bains with training in all areas of the
22 Litigation Support Service and Reconciliation Service;
23 is that right?

24 **A.** Yes.

25 **Q.** The aim of this was that the Litigation Support Service
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1 ARQ data was a contractual requirement of Fujitsu's
2 relationship with POL."

3 Is it right that you yourself did not have any role
4 in the extraction of ARQ data?

5 **A.** That's correct.

6 **Q.** You deal with your line management relationship with
7 Penny Thomas at paragraph 19 of your statement. Could
8 we have that on screen, please. It's page 6. You say
9 this:

10 "In the day-to-day performance of her role, Penny
11 Thomas reported to the PO Account Manager and the CISO,
12 rather than to me. As her line manager, I was copied
13 into some of Penny Thomas' email correspondence so that
14 I could understand and manage the resourcing levels and
15 capacity of the team. Penny Thomas also liaised
16 directly with POL in the performance of her role as
17 their direct point of contact for the Litigation Support
18 Service. From memory and review of the documentation,
19 Penny Thomas would occasionally copy me into email
20 correspondence with POL, so that I had visibility of her
21 capacity. Penny Thomas would only reach out to me for
22 assistance in relation to the Litigation Support Service
23 for things like arranging covering when she was away, as
24 I managed the team workloads. I do not recall Penny
25 Thomas raising concerns relating to the service itself,
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1 and Reconciliation Service would continue to function,
2 even if a member of the team was absent?

3 **A.** Yes.

4 **Q.** Do you mean by this that, absent Penny Thomas passing on
5 her knowledge to others, the Litigation Support Service
6 and Reconciliation Service would struggle to function?

7 **A.** Sorry, can you reword that for me?

8 **Q.** If Penny Thomas was the one who was not there, without
9 her passing on her knowledge, is what you're saying that
10 those services would have struggled to function?

11 **A.** Yes.

12 **Q.** In terms of the work of the term extracting ARQ data,
13 you deal with this at paragraph 25 of your statement.
14 Could we have that on screen, please. It is page 8 of
15 WITN06850100. Of the ARQ extraction work, you say this:

16 "At a high level, I was aware of the process the
17 team carried out to extract ARQ data. The team worked
18 in a secure room to access the audit servers via the
19 audit workstation and would extract the ARQ requested by
20 POL. If required, the team would produce
21 a corresponding witness statement in respect of how the
22 ARQ data was gathered. The team were responsible for
23 providing the ARQ data and witness statements to POL.
24 If required, they could also be asked to present this
25 evidence at court. I understood that the extraction of
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1 as these would normally be raised with the PO Account
2 Manager or CISO. I did not offer subject matter support
3 to the Litigation Support Service."

4 You also say at paragraph 26 of your statement that
5 you had no role in the provision of witness statements
6 or the legal proceedings which followed the extraction
7 of ARQ data.

8 **A.** Correct.

9 **Q.** Is it right that your evidence is that where issues
10 related to litigation support needed to be escalated
11 they were escalated to the Post Office Account Manager
12 and the Chief Information Security Officer?

13 **A.** That is correct.

14 **Q.** Could we have on screen, please, FUJ00172047. This is
15 an email chain from June 2010. If we can go, please, to
16 page 5 of this document, we can see the first email in
17 the chain, which is dated 23 June 2010. We may have
18 different page numbering, by the looks of things.
19 Page 5.

20 Apologies, that's entirely my fault.

21 The reference, if we can try that again, is
22 FUJ00097047. That's it. We've got there. Towards the
23 bottom.

24 That's the page we're after, the email at the bottom
25 there from Penny Thomas, 23 June 2010. This is an email
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1 from Penny Thomas to Graham Welsh and to you, as well as
2 Peter Thompson. It is copied to Gareth Jenkins and Alan
3 Holmes. Peter Thompson, who you say was the Post Office
4 Account manager at the time; is that right?

5 **A.** That's correct.

6 **Q.** The subject is "Duplication of Transaction Records on
7 ARQ Returns", and Ms Thomas attaches an initial report
8 on the problem. You say in your statement at
9 paragraph 34 that this is when you were first notified
10 of the issue; is that right?

11 **A.** That's correct.

12 **Q.** You are a recipient of the next email in the chain as
13 well, which appears on the previous page, page 4. That
14 is also from Penny Thomas and provides an update to her
15 note sent the day before. It provides some analysis
16 showing that there were 112 ARQs affected by the issue
17 in question, and there is a breakdown of that figure.
18 Ms Thomas goes on to say that:

19 "Audit Development are currently working on a fix
20 which is expected to be available Tuesday, 29 June."

21 She then sets out a proposed explanation for the
22 Post Office, which had been provided by Gareth Jenkins,
23 and his proposed explanation was this:

24 "With Horizon counters, the mechanism by which data
25 is audited has always worked on the principle that it is
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1 Services transactions where multiple identical mail
2 items are accepted, ie the Quantity button is set to
3 greater than 1, but postage labels are printed for each
4 individual item. This results in separate transactions
5 being generated for each item, which are identical in
6 the ARQ extracts (there is another minor difference in
7 the raw data apart from the NUM attribute, but this
8 different attribute is not currently included in the ARQ
9 extract)."

10 Do you recall this issue being raised with you now?

11 **A.** Now I recall the issue, since I referred to the
12 documentation, yes.

13 **Q.** Could we have on screen, please, FUJ00097036. This is
14 another email chain from June 2010. You are copied in
15 to one email which forwards on to you two further
16 emails. Could we go, please, to page 4 of the document.
17 Here we have an email from Penny Thomas to Graham Welsh,
18 which is copied to you. The email is dated 23 June
19 2010, and the subject is "Duplication of Transaction
20 Records".

21 In it, Ms Thomas asks whether Mr Welsh can spare
22 a few minutes to discuss the issue. The first of the
23 two emails forwarded to you is on page 5 of this
24 document. Can we go over the page, please. It is
25 an email from earlier in the day, on 23 June 2010, from
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1 acceptable to audit the same data more than once -- in
2 particular if in doubt as to whether or not it has been
3 previously audited successfully.

4 "The mechanism used on Horizon to retrieve the data
5 took this into account and only presented one instance
6 of such duplicate data in the ARQ extracts.

7 "However it has recently been noticed that the HNG-X
8 retrieval mechanism does not remove such duplicates and
9 a quick scan of the ARQs provided to Post Office Limited
10 since the change to the new system indicates that about
11 35% of the ARQs might contain some duplicate data.
12 A PEAK has been raised to remove such duplicate data in
13 the future. However until the fix is developed, tested
14 and deployed, there is a possibility that data is
15 duplicated.

16 "The reliable way to identify a duplicate
17 transaction is to use the NUM tribute that is used to
18 generate the unique sequence numbers. Unfortunately,
19 this attribute is not currently included in the Excel
20 version of the ARQ data that has been passed to Post
21 Office Limited in the past. This will be included in
22 all future ARQs until the problem is fixed.

23 "Meanwhile all that can be done on existing ARQs is
24 look for transactions that appear to be duplicates.
25 Note that we have identified a scenario with Postal
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1 Penny Thomas to Pat Lywood, who appears from the emails
2 on the page before to have been a Service Implementation
3 Manager; do you remember her now?

4 **A.** Yes.

5 **Q.** Ms Thomas says this:

6 "Hi Pat.

7 "We have a very significant problem which has been
8 recorded in PEAK PC0200468. In a nutshell the HNG-X
9 application is not removing duplicate transactions
10 (which may have been recorded twice on the audit server)
11 and they are appearing in the ARQ returns. For the old
12 Horizon application Riposte automatically removed
13 duplicate entries. An initial analysis shows that one
14 third of all ARQ returns (since the new application has
15 been in play) have duplicated transactions.

16 "Also we have a PEAK ... which would highlight any
17 duplication of records (this obviously isn't happening
18 now)."

19 The reply from Pat Lywood is on the previous page,
20 page 4, please. Starting about halfway down that page:

21 "Penny,

22 "I will add to CS Prayers but your chances of
23 getting it fixed before R2 is deployed is not good.

24 "Can I suggest that you explain the urgency to
25 Graham and get him to raise it at management prayers?
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1 "Can you also add a business impact to the PEAK
2 using the Impact button?

3 "Adam.

4 "Please can you get your guys to take a look at this
5 and let me know where the fix might be?

6 "Cheers

7 "Pat."

8 So Ms Thomas -- if we can scroll up, please, to the
9 top of the page -- was bringing you into the loop,
10 copying you in here, in her email to Graham Welsh,
11 sending on those two previous emails. This was
12 potentially a very significant problem, wasn't it?

13 **A.** Yes.

14 **Q.** On its face, there might be duplicate entries on ARQ
15 spreadsheets which had been provided to the Post
16 Office --

17 **A.** Correct.

18 **Q.** -- and at least some of those ARQs were for use in
19 court?

20 **A.** I believe so.

21 **Q.** Would you have discussed the substance of this issue
22 with Ms Thomas?

23 **A.** No.

24 **Q.** Why not?

25 **A.** Because she would have already taken it up to the
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1 today -- could you fit in a conference call at any time
2 today?

3 "Kind regards

4 "Penny."

5 The email she was forwarding, scrolling down,
6 please, was from Mark Dinsdale from the Post Office,
7 7 July 2010. It says this:

8 "Penny, as discussed our Legal Team in principle are
9 happy with this and have agreed that if yourselves
10 provide a witness statement covering your explanation
11 below and additionally the following points then the
12 workaround gets the green light.

13 "Juliet suggested the additional points to cover
14 include, what are we doing about it, and over what
15 period did this anomaly occur (ie upon migration to
16 HNG-X). She also suggested that the witness statement
17 be completed by Gareth Jenkins, your expert witness."

18 Ms Thomas attached a standard witness statement,
19 which had been modified for duplicate transactions, for
20 the duplicate transactions issue. Do you recall there
21 being a standard Fujitsu witness statement which was
22 used by Litigation Support?

23 **A.** I recall they had a template, yes.

24 **Q.** Could we have on screen, please, the statement which was
25 attached to Ms Thomas email, it is FUJ00122904. The
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1 relevant senior management.

2 **Q.** Do you recall being concerned about this issue at the
3 time?

4 **A.** Yeah, I think we were all concerned about the issue,
5 hence why Penny raised it as urgent. But I don't recall
6 any detail around the issue in depth.

7 **Q.** Can we have on screen, please, FUJ00122903.

8 This is an email chain from July 2010. The top
9 email is from Penny Thomas to you, among a number of
10 other recipients, including Graham Welsh, Gareth Jenkins
11 and Tom Lillywhite. Mr Lillywhite was, I think you have
12 said, the Chief Information Security Officer.

13 **A.** He was.

14 **Q.** It is dated 7 July 2010. Ms Thomas says this,
15 forwarding on the email chain below:

16 "Please see response from POL.

17 "The suggestion here is that Gareth completes all
18 witness statements; this doesn't fit into the current
19 SLA; and really isn't feasible, as far as I can see."

20 Just pausing there, "SLA", what does that stand for?

21 **A.** Service Level Agreement.

22 **Q.** "I attach a standard witness statement with
23 modifications for duplicate transactions; which Gareth
24 has already reviewed.

25 "Guy -- I am not sure where you are working from
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1 statement is in the name of Penelope Anne Thomas. It is
2 a standard statement, therefore undated. The
3 introductory paragraph says this:

4 "I have been employed by Fujitsu Services, Post
5 Office Account, formally ICL Pathway Limited since
6 20 January 2004 as an Information Technology Security
7 Analyst responsible for audit data extractions and IT
8 security. I have working knowledge of the computer
9 system known as Horizon, which is a computerised
10 accounting system used by Post Office Limited. I am
11 authorised by Fujitsu Services to undertake extractions
12 of audit archived data and to obtain information
13 regarding system transactions recorded on the Horizon
14 system."

15 There then follows an overview of the Horizon
16 system, scrolling down slowly, please, and going over
17 two pages, to page 3., there is a paragraph dealing with
18 audit information:

19 "An audit of all information handled by the TMS is
20 taken daily by copying all new messages to archive
21 media. This creates a record of all completed outlet
22 transaction details including its origin -- outlet and
23 counter, when it happened, who caused it to happen and
24 the outcome. The TMS journal is maintained at each of
25 the Fujitsu Services Data Centre sites and is created by
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1 securely replicating all completed transaction records
2 that occurred in every Outlet. They therefore provide
3 the ability to compare the audit track record of the
4 same transaction recorded in two places to verify that
5 systems were operating correctly. Records of all
6 transactions are written to audit archive media."

7 We can see three new paragraphs, scrolling down
8 a little, please, dealing with the duplicate
9 transactions issue, which read as follows:

10 "With Horizon counters, the mechanism by which Data
11 is audited has always worked on the principle that it is
12 acceptable to audit the same data more than once -- in
13 particular if in doubt as to whether or not it has been
14 previously audited successfully. The mechanism used on
15 Horizon to retrieve the data took this into account and
16 only presented one instance of such duplicate data in
17 the ARQ extracts.

18 "In January 2010 a new HNG-X application was
19 introduced to filter transaction records for
20 presentation to Post Office Limited. It has recently
21 been noticed that this HNG-X retrieval mechanism does
22 not remove such duplicates. An enhancement to the
23 extraction tool set will be developed, tested and
24 deployed and will remove such duplicate data in the
25 future. However until this enhancement is deployed

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1 as to effect the information held within it."

2 This draft standard witness statement was circulated
3 on 7 July 2010, as we've just seen from the relevant
4 emails. Could we have on screen, please, FUJ00225719.
5 Before we look through this document here, do you
6 remember receiving and reading the draft statement
7 circulated by Ms Thomas with that proposed wording?

8 **A.** No, I don't recall receiving or reading it.
9 **Q.** Would you, having seen that email chain, have read the
10 statement that was attached to the email which you were
11 copied in to?
12 **A.** I would if I was -- if it was sent to me direct, not as
13 a copy.
14 **Q.** Starting about halfway down the page here is an email
15 from Penny Thomas, dated 8 September 2010, to Andy
16 Dunks, copied to you. The subject line is
17 "Kirkoswald -- ARQ P048-P058", and it reads as follows:

18 "Andy
19 "As you know, these returns are reruns of work you
20 have already completed; 3 out of the 12 of your returns
21 complained duplicate transactions, all (48-59) need to
22 be re-presented on one disc. They are due in court on
23 20 September; we have to get them to Salford and they,
24 in turn, have to relay to the Investigator, so we need
25 to get them in the post today.

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1 there is a possibility that data is duplicated. The
2 reliable way to identify a duplicate transaction is to
3 use the NUM attribute that is used to generate the
4 unique sequence numbers. This will be included in all
5 future transaction record returns until the retrieval
6 mechanism is enhanced. A semi-automated process to copy
7 the returned data, and then to identify and remove any
8 duplicated records which may be present from this copy
9 by using the NUM attribute, has been agreed with Post
10 Office Limited for use in the interim period.

11 "It is emphasised that the duplication of audited
12 records has not, in any way, affected any actual
13 physical transactions recorded on any counter at any
14 outlet. The duplication of records has occurred during
15 the auditing process when records were in the process of
16 being recorded purely for audit purposes from the
17 correspondence servers to the audit servers."

18 Then going, please, to page 7 of this document. The
19 penultimate paragraph on this page says this:

20 "There is no reason to believe that the information
21 in this statement is inaccurate because of the improper
22 use of the system. To the best of my knowledge and
23 belief at all material times the system was operating
24 properly, or if not, in any respect in which it was not
25 operating properly, or was out of operation was not such

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1 "In order to get these out as quickly as possible
2 I asked Raj to rerun them for you. If you really are
3 unhappy to take ownership of the work she has completed
4 on your behalf please could you rerun them yourself; Raj
5 can show you the fast ARQ process which really is not
6 onerous at all. You will then need to update your
7 witness statement. The disc and statement need to be in
8 the post today, please.

9 "Kind regards.

10 "Penny.

11 Going back to the start of this email chain, which
12 is on page 2 of the document, this is an email dated
13 6 September 2010, from Ms Bains to Mr Dunks, copied to
14 Penny Thomas. So you're not copied on this email but to
15 forwarded on to you. It says this:

16 "Hi Andy,

17 "Just spoken to Maureen and the data for Kirkoswald
18 needs to be resent as this had duplicated data. I have
19 re-ran the reports for you, so please can you check and
20 get these sent to POL, also I understand that these also
21 require the Witness Statements as well so please can you
22 get this done as we will need to get this out ASAP as
23 this will be going to court on 20 September.

24 "Also do you know where the PGP files were for the
25 set of reports that you produced originally as they need

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1 to be copied over to the NAS and we cannot locate them
 2 on the D drive, could these be on your desktop?
 3 "Many thanks.
 4 "Raj."
 5 So it appears that an ARQ return that contained
 6 duplicated data in September 2010 -- and Ms Bains was
 7 asking Mr Dunks to check it; is that a fair reading of
 8 that email?
 9 **A.** Yeah, she was asking him to check what she had retrieved
 10 and prepare it ready to be sent off, yes.
 11 **Q.** Going to the top of the page, please, there is an email
 12 from Ms Bains, which says this:
 13 "Penny,
 14 "Andy has checked the information on the disk but
 15 with regards to the witness statement mentioned that
 16 I would need to compile this as I have ran the
 17 retrievals off, please advise whether I would need to do
 18 this."
 19 Just scrolling up a little, we can see this email
 20 was sent on 7 September 2010. Going up further, a page,
 21 to the email you were copied in to, in that email that
 22 you're copied in to, Ms Thomas was effectively saying it
 23 seems that it should be Mr Dunks who provided the
 24 witness statement and not Ms Bains --
 25 **A.** Correct.

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1 transaction records where duplicate transactions were
 2 previously identified. These records have been checked
 3 and we can confirm duplicates are not now present.
 4 "We will start retrieving records for ARQ requests
 5 and will do so in accordance with your priorities".
 6 Can you help with what Ms Thomas meant by being back
 7 in business.
 8 **A.** We stopped retrieving the ARQ requests while we were
 9 waiting for the fix to go in, for the duplicate
 10 transactions.
 11 **Q.** Could we have on screen, please, FUJ00122961. This is
 12 an email chain from September 2010. Starting with the
 13 email about halfway down the page, this is from Penny
 14 Thomas to Andy Dunks, and is dated 10 September 2010.
 15 The subject is "[Crown] v Wendy Buffrey. It says this:
 16 "Andy,
 17 "I have prepared a witness statement for you --
 18 PLEASE READ IT THROUGH TO MAKE SURE IT'S CORRECT [all in
 19 capitals]. It's saved in your [Witness Statement] WS
 20 drive.
 21 "I will also load to the transaction records for
 22 you."
 23 You were not copied in to this email but you were
 24 brought into the loop on this case earlier in the chain
 25 by Ms Thomas. We can see this over the page, please,

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1 **Q.** -- is that right? Why do you think you were copied into
 2 this email?
 3 **A.** Because I was the line manager of Mr Dunks and Raj.
 4 **Q.** So you were copied in, in respect of the allocation of
 5 the work or --
 6 **A.** The work.
 7 **Q.** For what reason?
 8 **A.** So if I recall correctly, it's in the allocation of work
 9 to make sure that the work be done in the timescales,
 10 and also in concerns around Mr Dunks not wanting to pull
 11 off the work -- do the work that was requested.
 12 **Q.** In general terms, is it right that it was either
 13 Ms Thomas or Mr Dunks who provided witness statements
 14 when were needed for court?
 15 **A.** That's correct.
 16 **Q.** Could we have on screen, please, FUJ00154918. This is
 17 an email from Penny Thomas to Tom Lillywhite and to you,
 18 dated 4 August 2010. It simply says, "We are back in
 19 business!" and forwards on the email from Penny Thomas
 20 to Mark Dinsdale below. That's Mark Dinsdale of the
 21 Post Office.
 22 That email of 4th August says:
 23 "Mark
 24 "I am pleased to report that following the
 25 deployment of R2 we have re-retrieved a selection of

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1 the second email down, Penny Thomas to Andy Dunks copied
 2 to you, 10 September, and it says:
 3 "Hi Andy
 4 "See mail string. Could you please re-present the
 5 ARQs and provide a covering statement today? If so,
 6 I'll confirm to POL.
 7 "I'll let you have a copy of my statement."
 8 Again, can you help with why you were being copied
 9 in?
 10 **A.** Just from a management perspective to awareness of what
 11 work Andy needed to do, so he wasn't taken off to do
 12 something else.
 13 **Q.** We have the draft statement which Ms Thomas sent to
 14 Mr Dunks. Could we have that on screen, please. It's
 15 FUJ00122958. On the face of the first page, it appears
 16 similar to the standard statement we looked at earlier,
 17 doesn't it?
 18 **A.** It does.
 19 **Q.** But, looking through this statement -- and if we can
 20 just scroll down page 1, and page 2 and to page 3,
 21 stopping there, please -- we see the paragraph on
 22 archive media there and we don't see the draft
 23 paragraphs which were in the July 2010 proposed
 24 statement that Penny Thomas was circulating; do you
 25 remember, the three paragraphs which were underlined in

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1 her July draft, relating to the duplicate transactions
2 issue?

3 Obviously, events had moved on by this point but
4 there doesn't appear, does there, to be a reference here
5 to that duplicate transactions issue having occurred; is
6 that right?

7 **A.** That's correct.

8 **Q.** Just scrolling down, if you need to, to look. Then, at
9 the bottom of page 3, we have:

10 "When information relating to individual
11 transactions is requested, the data is extracted from
12 the audit archive media via the audit workstations.
13 Information is presented in exactly the same way as the
14 data held in the archive although it can be filtered
15 depending on the type of information requested. The
16 integrity of data retrieved for audit purposes is
17 guaranteed at all times from the point of gathering,
18 storage and retrieval, to subsequent dispatch to the
19 requester. Controls have been established that provide
20 assurances to Post Office Internal Audit that this
21 integrity is maintained."

22 Going over the page, please. Then:

23 "During audit data extractions the following
24 controls apply ..."

25 Then there are number of controls that are listed
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1 the statement was inaccurate because of the improper use
2 of the system and that, at all material times, the
3 system was operating properly, or the rest of that
4 sentence?

5 **A.** My understanding was that that statement is in regards
6 to the audit workstations where they retrieved the data
7 from, rather than the integrity of the Horizon system
8 itself.

9 **Q.** I see. Given what you knew at the time about the
10 duplicate transactions issue, would you have had any
11 concern with the paragraph that we've just read out at
12 all, or not, for the reason you've just said?

13 **A.** I wouldn't, for the reason I've just said. Because
14 I believe that was related to the workstations that
15 they -- how they pulled the data off rather than the
16 Horizon system itself.

17 **Q.** That can come down, thank you. There is one further
18 topic I would like to ask you about could we have on
19 screen, please, POL00028838. These are notes from
20 a meeting in 2010, which was held to discuss a bug
21 called the receipts and payments mismatch bug. Gareth
22 Jenkins and John Simpkins are listed as being in
23 attendance. First of all, were you ever told about this
24 issue: the receipts and payments matters match issue?

25 **A.** No.

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1 there. There is no mention in that paragraph, either,
2 of any past issues with duplication of transactions in
3 the ARQ data, is there?

4 **A.** No.

5 **Q.** Going over to page 5, the ARQs in the specific case are
6 addressed, scrolling down. Then over the page to
7 page 6, please. Going down to the bottom, please, the
8 penultimate paragraph, we have the paragraph:

9 "There is no reason to believe that the system in
10 this statement is inaccurate because of the improper use
11 of the system. To the best of my knowledge and belief
12 at all material times the system was operating properly,
13 or if not, any respect in which it was not operating
14 properly, or was out of operation was not such as to
15 effect the information held within it."

16 Were you aware at the time that the form of words
17 addressing duplicate transactions had not been included
18 in any form in the standard statement in September 2010?

19 **A.** No, I wasn't.

20 **Q.** Had you been aware, do you think you might have queried
21 it?

22 **A.** I think I'd have queried why we'd removed it, yes.

23 **Q.** Were you aware that a paragraph had been, and continued
24 to be, included in the standard form statement saying
25 there was no reason to believe that the information in
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1 **Q.** The issue is addressed under the heading "What is the
2 issue?":

3 "Discrepancies showing at the Horizon counter
4 disappear when the branch follows certain process steps,
5 but will still show within the back end branch account.
6 This is currently impacting circa 40 branches since
7 migration on to Horizon Online, with an overall cash
8 value of circa £20,000 loss. This issue will only occur
9 if a branch cancels the completion of the trading period
10 but within the same session continues to roll into a new
11 balance period.

12 "At this time we have not communicated with branches
13 affected and we do not believe they are exploiting this
14 bug intentionally.

15 "The problem occurs as part of the process when
16 moving discrepancies on the Horizon system into local
17 suspense."

18 Having looked at that description again, do you
19 recall any knowledge of that issue arising?

20 **A.** I have no knowledge of that issue whatsoever.

21 **Q.** You have seen an example of the *pro forma* statement
22 being submitted in support of the criminal cases in
23 court in September 2010, the one we've just looked at.
24 Does it concern you at all that, in the same year, this
25 bug was known about by Fujitsu and yet statements were
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1 being submitted to the court saying that at all material
 2 times the system was operating properly?
 3 **A.** Yes, it does.
 4 **Q.** When you looked at that paragraph before, you said you
 5 took that to be referring to the audit workstations?
 6 **A.** Yes.
 7 **Q.** So just revisiting that, do you think that paragraph
 8 could have been read more widely as referring to the
 9 Horizon system operating properly?
 10 **A.** I think it could have been worded better, yes, to what
 11 the -- that paragraph is actually in relation to.
 12 **Q.** Because, on its face, it was saying the system was
 13 operating properly --
 14 **A.** Yes.
 15 **Q.** -- and, looking at this, does this cause you concern,
 16 knowing that was in the witness statement?
 17 **A.** Yes.
 18 **Q.** Going, please, to page 3 of this document, the solutions
 19 being considered were set out. Looking at solution 1,
 20 please:
 21 "... Alter the Horizon branch figure at the counter
 22 to show the discrepancy. Fujitsu would have to manually
 23 write an entry value to the local branch account.
 24 "Impact -- When the branch comes to complete next
 25 trading period they would have a discrepancy, which they

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1 asked about the receipts and payments mismatch issue
 2 notes, there was a meeting and present at that meeting
 3 was Gareth Jenkins; is that right, do you recall?
 4 **A.** I don't recall.
 5 **Q.** Okay do you need to see the document?
 6 **A.** Yes, please.
 7 **Q.** It is POL00028838. Right at the top, do you see his
 8 name there?
 9 **A.** Yes.
 10 **Q.** At paragraph 21 of your statement -- you've already
 11 confirmed in your statement and your evidence that you
 12 were Penny Thomas' line manager?
 13 **A.** That's correct.
 14 **Q.** At paragraph 21 of your statement, you say:
 15 "I believe Gareth Jenkins was the Senior Solution
 16 Architect for the Horizon system. He assisted Penny
 17 Thomas in understanding the ARQ data she retrieved as
 18 part of the Litigation Support Service", and you say you
 19 believe he was, on occasion, called as expert witness.
 20 **A.** That's correct.
 21 **Q.** You've been taken to statements that Mr Dunks gave in
 22 relation to that standard paragraph, and --
 23 **A.** Correct.
 24 **Q.** -- you're aware that Penny Thomas gave similar
 25 statements as well, are you?

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1 would have to bring to account.
 2 "Risk -- This has significant data integrity
 3 concerns and could lead to questions of 'tampering' with
 4 the branch system and could generate questions around
 5 how the discrepancy was caused. This solution could
 6 have moral implications of Post Office changing branch
 7 data without informing the branch."
 8 When you were Security Operations Manager, were you
 9 aware that the Software Support Centre had remote access
 10 to the Horizon system, that they could remotely access
 11 the counter in a branch and alter the values?
 12 **A.** I was aware they had remote access. I wasn't aware that
 13 they had the ability to amend any data in there.
 14 **Q.** Had you been aware, would this have been a cause for
 15 concern for you?
 16 **A.** Yes, because you shouldn't be able to manipulate data.
 17 **MS PRICE:** Sir, those are all the questions I have for
 18 Ms Munro. Shall I turn to Core Participants or was
 19 there anything you wished to ask at this stage?
 20 **SIR WYN WILLIAMS:** No, let any Core Participant's
 21 representative ask any questions.
 22 **MS PRICE:** Mr Jacobs has a question.
 23 **Questioned by MR JACOBS**
 24 **MR JACOBS:** Thank you.
 25 I have a very brief follow-up question. You were

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1 **A.** Yes.
 2 **Q.** So you said in your evidence today that you weren't
 3 aware of this receipts and payments mismatch issue?
 4 **A.** No.
 5 **Q.** We can see from the document that it affected, I think,
 6 up to 40 branches. Was Mr Jenkins part of the wider
 7 team then? He was assisting Penny Thomas, who you line
 8 managed; that's right, isn't it?
 9 **A.** Yes.
 10 **Q.** So -- and you may not be able to answer this -- it's
 11 likely, isn't it, do you think, that if Gareth Jenkins
 12 was present at this meeting, that when Ms Thomas gave
 13 witness statements using that standard paragraph in
 14 2010, that she would have known about this, because
 15 Mr Jenkins was assisting her?
 16 **A.** I can't answer that because I wouldn't know what Gareth
 17 and Penny discussed. He assisted her with the different
 18 witness statements and the data, whether they discussed
 19 these issues, I wouldn't know. Sorry.
 20 **Q.** Do you accept that Ms Thomas in 2010 gave statements
 21 using those generic words about the Fujitsu system
 22 operating properly?
 23 **A.** Yes, they're the standard template.
 24 **Q.** Do you think, as her line manager, you ought to have
 25 known about these potential difficulties when Ms Thomas

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1 was using that paragraph, effectively giving Horizon
 2 a clean bill of health in criminal prosecutions of
 3 subpostmasters?
 4 **A.** I think because we'd got -- Penny discussed most of her
 5 issues or concerns or questions around the systems and
 6 that service with the CISO and the Account Manager, then
 7 it was already at an escalated level. So I couldn't
 8 actually add any value in that way, so I think it was
 9 taken to that higher level rather -- because of the
 10 service that it's providing.
 11 **Q.** Okay, we're just trying to understand the structure. So
 12 you were her line manager?
 13 **A.** Yes.
 14 **Q.** But, in relation to the evidence that she gave and
 15 perhaps the veracity of the evidence that she gave,
 16 there was someone else who she was reporting to; is that
 17 right?
 18 **A.** Yes, so she liaised closely with both the Account
 19 Manager and the CISO.
 20 **Q.** A general question -- and you may or may not be able to
 21 answer this -- but, having seen this and having been
 22 taken to the documents that you've been taken to today,
 23 do you consider that subpostmasters were being
 24 prosecuted in circumstances where the Post Office, with
 25 Fujitsu's assistance, was misrepresenting the robustness
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1 second message and we see:
 2 "Hi Graham
 3 "Thanks for the update.
 4 "As far as standing in for Penny, I do not think my
 5 knowledge is good enough to be able to do this to the
 6 level that Penny could answer [the] questions. I would
 7 not be comfortable to do it."
 8 If we scroll up again, we see the next message. We
 9 see this is where you're copied in. Can you see that,
 10 Ms Munro?
 11 **A.** Mm-hm.
 12 **Q.** Ms Thomas copies the message to you and says:
 13 "Donna
 14 "It would appear you have a gaping hole as far as
 15 prosecution support is concerned; Andy being
 16 uncomfortable to support a basic statement and Raj not
 17 being prepared to submit one."
 18 Now, looking at this, Ms Thomas is writing to you
 19 for your input, isn't she?
 20 **A.** Yes.
 21 **Q.** It appears your input is needed, not just for matters of
 22 cover but she's raising a substantive issue about what
 23 evidence the members of your team are qualified to give;
 24 is that fair?
 25 **A.** It's not right in what they're qualified to give; it's
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1 and integrity of the Horizon system?
 2 **A.** Based on what I've seen and read today, I would say yes.
 3 **MR JACOBS:** Well, I don't have any more questions for you.
 4 Thank you very much.
 5 **MS PRICE:** Sir, there's a question from Ms Patrick.
 6 **SIR WYN WILLIAMS:** Yes.
 7 **Questioned by MS PATRICK**
 8 **MS PATRICK:** Good afternoon, Ms Munro. My name is
 9 Ms Patrick. I represent, with Mr Moloney, a number of
 10 subpostmasters who were prosecuted and convicted and who
 11 since have had their convictions overturned.
 12 I have one set of questions about one document, so
 13 I hope we'll be quite quick.
 14 The document is FUJ00156518. If we can go to the
 15 bottom of page 1, we can see -- ah, can you see that?
 16 That's been highlighted there, I think. There's
 17 an email there which starts -- it's in January 2012,
 18 from Graham Brander to Penny Thomas and Andy Dunks. It
 19 says, "Penny/Andy", and there's a little back and forth
 20 but, essentially, it's a message about attending trial.
 21 If we can scroll up a little, you see that:
 22 "Andy; can you confirm that if required, you are
 23 able to covering Penny's evidence in case she is unable
 24 to attend."
 25 If we can scroll up a little please, we see the
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1 what they're comfortable to give.
 2 **Q.** Indeed, and that there appears to be a hole in your
 3 team, in terms of the prosecution support you're able to
 4 provide; is that fair?
 5 **A.** From what we read in here, that could be assumed, yes.
 6 **Q.** So she's raising a gaping hole and is that not
 7 an important gaping hole in prosecution support?
 8 **A.** Yes.
 9 **Q.** What did you consider her intent to be when she was
 10 raising that with you?
 11 **A.** She's bringing to light that individuals aren't happy to
 12 do the role that they've been employed to do.
 13 **Q.** Why would she be raising that with you? What did she
 14 want you to do?
 15 **A.** Discuss with the individuals.
 16 **Q.** Okay. Now, I'm going to -- I won't bring the document
 17 up, I've got a piece taken here from what Ms Sangha says
 18 in her witness statement. She said to the Inquiry:
 19 "I can see that in around September 2010 I was asked
 20 to provide a witness statement in relation to an ARQ
 21 request that I actioned."
 22 So separate occasion, but she's asked to provide
 23 evidence. She says:
 24 "Although I cannot recall if it was in relation to
 25 this ARQ request, I can recall speaking with Ms Munro
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1 and agreeing that all witness statement requests would
 2 be actioned by Ms Thomas and Mr Dunks as they had more
 3 experience and knowledge of Horizon."

4 Now, if we can look at this, if, as she suggests,
 5 you agreed that all witness statements should be
 6 actioned by Ms Thomas and Mr Dunks, does that not
 7 suggest that you had a more active management role in
 8 Litigation Support than your statement perhaps would
 9 have suggested?

10 **A.** No, I managed the team and their workloads.

11 **MS PATRICK:** Okay.

12 I have no further questions for you, Ms Munro.

13 **SIR WYN WILLIAMS:** Is that it, Ms Price?

14 **MS PRICE:** Yes, sir, it is.

15 **SIR WYN WILLIAMS:** All right.

16 Well, thank you very much, Mrs Munro, for providing
 17 a witness statement and coming to give evidence.

18 That concludes today's proceedings, I believe,
 19 Ms Price?

20 **MS PRICE:** Yes, sir.

21 **SIR WYN WILLIAMS:** I hope that those Core Participants who
 22 were present have found at least some of the evidence
 23 informative.

24 I think we have Mr Patterson tomorrow, do we not?

25 **MS PRICE:** That is correct, sir.

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1 **SIR WYN WILLIAMS:** All right, 10.00 tomorrow morning.

2 **MS PRICE:** Thank you.

3 **(3.46 pm)**

4 **(The hearing adjourned until 10.00 am the following day)**

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