

Thursday, 16 May 2024

1
 2 (9.45 am)
 3 **MS PRICE:** Good morning, sir, can you see and hear us?
 4 **SIR WYN WILLIAMS:** Yes, thank you very much.
 5 **MS PRICE:** May we please call Ms Sewell.
 6 **SIR WYN WILLIAMS:** Yes.
 7 **LESLEY JESSIE SEWELL (sworn)**
 8 **Questioned by MS PRICE**
 9 **SIR WYN WILLIAMS:** Ms Sewell, I appreciate this may be
 10 upsetting for you. Ms Price will ask you a number of
 11 questions in a proper and sensible manner but if, at any
 12 time, you feel you need a break, just let me know, all
 13 right?
 14 **THE WITNESS:** Thank you, sir.
 15 **MS PRICE:** Can you confirm your full name, please,
 16 Ms Sewell?
 17 **A.** Lesley Jessie Sewell.
 18 **Q.** Thank you for coming to the Inquiry to assist it in its
 19 work. As you know, my name is Emma Price and I ask you
 20 questions on behalf of the Inquiry.
 21 You should have in front of you a hard copy of your
 22 witness statement; do you have that?
 23 **A.** Yes.
 24 **Q.** It is dated 16 April 2024, and if you could turn to
 25 page 41 of that document, please.

1

1 **A.** That's correct.
 2 **Q.** You started as a Trainee Programmer and your final role
 3 was Managing Director of IT?
 4 **A.** That's correct.
 5 **Q.** You say in your statement that in your 25 years at
 6 Northern Rock you led many major IT programmes. What
 7 did leading such programmes involve?
 8 **A.** So I led programmes for -- a good example of that would
 9 be full rollout of a workflow solution across the whole
 10 of the business. So I would take a leading role in
 11 that, in sponsoring them.
 12 **Q.** Whilst you were at Northern Rock, were you ever involved
 13 in overseeing, developing or managing any Electronic
 14 Point of Sale systems?
 15 **A.** The only systems would have been branch systems.
 16 **Q.** The same question in relation to accounting systems?
 17 **A.** Yes, finance and treasury systems.
 18 **Q.** You joined the Post Office in April 2010; is that right?
 19 **A.** That's correct.
 20 **Q.** Your role when you joined was Head of IT and Change?
 21 **A.** That's correct.
 22 **Q.** Who did you report to in that role?
 23 **A.** Mike Young.
 24 **Q.** Whose position at the time was?
 25 **A.** I believe it was Chief Operating Officer.

3

1 **A.** Yes.
 2 **Q.** Is that your signature?
 3 **A.** It is.
 4 **Q.** Are the contents of that statement true to the best of
 5 your knowledge and belief?
 6 **A.** They are.
 7 **Q.** That witness statement, for which the reference is
 8 WITN00840100 is now in evidence and will be published on
 9 the Inquiry's website in due course?
 10 I'd like to start, please, with your professional
 11 background and the roles you held at the Post Office.
 12 **A.** Yes.
 13 **Q.** As you set out in your statement, your bachelor's degree
 14 was applied computing?
 15 **A.** That's right.
 16 **Q.** You then completed an MBA?
 17 **A.** That's right.
 18 **Q.** You started your career as a trainee computer operator
 19 in Newcastle Polytechnic's Computing Department; is that
 20 right?
 21 **A.** I did.
 22 **Q.** Then from 1985 to 2010 you worked for Northern Rock?
 23 **A.** I did.
 24 **Q.** Is it right that all of your roles at Northern Rock were
 25 in IT?

2

1 **Q.** You say in your statement you were Head of IT until the
 2 first or second quarter of 2012 when you were asked to
 3 be interim Chief Operating Officer after Mike Young's
 4 departure; is that right?
 5 **A.** That's correct.
 6 **Q.** Roughly how long did you remain in that interim role?
 7 **A.** It was for a very short period. I think probably
 8 between three and five months maximum.
 9 **Q.** When you took up that interim role, did you become part
 10 of the Executive Committee?
 11 **A.** Yes, I did.
 12 **Q.** By the end of 2012, you had taken up the role of Chief
 13 Information Officer; is that right?
 14 **A.** Yes.
 15 **Q.** Did you remain on the Executive Committee as Chief
 16 Information Officer?
 17 **A.** I did, until the end of 2014.
 18 **Q.** What happened at the end of 2014 that meant you were no
 19 longer on the Executive Committee?
 20 **A.** There was a restructure and we had a Group Executive
 21 which was created.
 22 **Q.** As Chief Information Officer, you were initially
 23 reporting to Sue Barton, the Post Office Strategy
 24 Director; is that right?
 25 **A.** That's correct.

4

1 Q. Until she left at the end of 2013, after which time you
2 were reported to the Chief Financial Officer, Chris Day?
3 A. That's correct.
4 Q. At paragraph 9 of your statement, you set out a number
5 of additional responsibilities for Information Security,
6 which you took on from late 2013 into 2014, and these
7 included commissioning a Deloitte maturity review to
8 inform the information security operating model?
9 A. That's right.
10 Q. Was this Deloitte review the Project Zebra review that
11 you have referred to elsewhere in your statement?
12 A. No, it wasn't. It was completely separate.
13 Q. Okay. Can you help a little bit with what that maturity
14 review involved?
15 A. It was basically looking at current responsibilities and
16 scope for information security and looking at what was
17 in place, and determining, on a standard information
18 security maturity model, where Post Office actually sat
19 on that.
20 Q. You have identified members of your team when you were
21 Chief Information Officer at paragraph 10 of your
22 statement. Could we have that on screen, please. It's
23 page 6 of the statement. Here you say this:
24 "As CIO I brought in an experienced IT Programme
25 Lead/Transformation Director, Neil Wilkinson, who was

5

1 Officer, following a restructure in early 2015 --
2 A. That's correct.
3 Q. -- and, from that point, you reported to the new Chief
4 Financial Officer, Alisdair Cameron?
5 A. Yes.
6 Q. Whilst reporting to Alisdair Cameron in 2015, you took
7 on the additional responsibility of back office
8 activities for Product and Branch Accounting and HR; is
9 that right?
10 A. That's correct.
11 Q. You left the Post Office in November 2015, following
12 your resignation in early June 2015?
13 A. That's correct.
14 Q. Turning, please, to the substance of your roles with the
15 Post Office, you describe your first role, the Head of
16 IT and Change role, at paragraph 7. That's page 3. You
17 say:
18 "On joining POL, my understanding was that I had
19 been brought in to oversee the separation from RMG and
20 the resulting IT transformation and to build the IT
21 capability post-separation."
22 Further down this paragraph, about five lines up
23 from the bottom, you say this:
24 "My objective was, with the support of the
25 executives and the Board, to build a holistic IT

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1 responsible for delivering separation and then more
2 broadly the IT Transformation (procurements and
3 delivery). I also brought in a Chief Technology
4 Officer, Paul Bleasby, who led the architecture team and
5 was the Chief Architect of [Post Office Limited's] IT
6 systems. He worked closely with third party suppliers
7 (including Fujitsu) and the wider business on developing
8 the IT strategy and delivering aspects of the IT
9 Transformation Programme. I would rely on Paul for
10 technical input. David Hulbert ..."
11 Am I pronouncing that correctly?
12 A. That's correct.
13 Q. "... was the copied in Head of Service responsible for
14 the day-to-day operations of all the IT services
15 (including Horizon). All directly reported to me, in
16 addition to a Head of Business Relationships, Head of
17 Quality and Standards, Head of Managed Services and Head
18 of Projects."
19 Did you have regular meetings with your direct
20 reports?
21 A. Yes.
22 Q. How often would you meet with them?
23 A. From memory, I think weekly.
24 Q. You say in your statement at paragraph 6 that you became
25 Operations Director in addition to Chief Information

6

1 strategy for separation. Horizon and the relationship
2 with Fujitsu was one part of the overall IT strategy."
3 Focusing first on what you were told about Horizon
4 when you took up the Head of IT and Change role in 2010,
5 could we go, please, to paragraph 12 of the statement,
6 that's page 7. You say here:
7 "I had no knowledge of Horizon before joining [Post
8 Office Limited] other than at the interview stage being
9 told about key suppliers, including Fujitsu. On joining
10 [Post Office Limited], I learned more detail about
11 Fujitsu building Horizon and that the contract had been
12 in place since the 1990s. I understood Horizon to be
13 the point of sale system at the Post Office counters
14 (SPMs, Crowns and Multiples) which would be used to
15 process and record all transactions performed within
16 a branch. I cannot recall any of the specific details,
17 but during my first few weeks at [Post Office Limited]
18 it is likely that I would have been given a walkthrough
19 of Horizon and it is possible that some high-level
20 architectural presentations regarding Horizon were
21 delivered to me. Beyond this, the only formal training
22 on Horizon I recall was a specific type of training
23 which was limited training on Horizon and more
24 specifically the Post & Go machines."
25 At the end of this paragraph you say:

8

1 "I would have had a high-level awareness about how
2 the system was architected, however as Head of IT/[Chief
3 Information Officer] I was neither a technical nor
4 a functional expert in Horizon."

5 Who was it who briefed you about the history of the
6 Horizon system when you joined the Post Office?

7 **A.** So I believe it would have been Head of Architecture at
8 the time, was David Gray.

9 **Q.** Who was it who you the walkthrough of Horizon?

10 **A.** It's likely to have been him, although I can't recall
11 any specifics, I'm sorry.

12 **Q.** You say at the end of the paragraph you were neither
13 a technical nor a functional expert in Horizon but, as
14 a former programmer with your background in numerous IT
15 roles, would you agree in general terms that you that
16 the relevant expertise to understand technical issues
17 which might and did arise from the operation of the
18 Horizon system?

19 **A.** At a level, yes, but deep, deep technical knowledge,
20 I would not have had that.

21 **Q.** In general terms, do you think that the IT function
22 within the Post Office was adequately resourced with
23 staff with appropriate expertise?

24 **A.** When I started, no.

25 **Q.** Can you help with why you say no?

9

1 McLean?

2 **A.** McLean.

3 **Q.** "... led this team and reported into the [Chief
4 Operating Officer] Mike Young. Managed Services at this
5 time was also responsible for the management and
6 oversight of the outsourced business activities and
7 relationships (eg Bank of Ireland/HP/Telephony). As
8 Head of IT and Change, insofar as Horizon was concerned,
9 I had responsibility for any IT change activity
10 (ie introduction of the Post & Go machines). If there
11 were any significant incidents (ie a P1 or P2 as I refer
12 to below at paragraph 18) the IT Team would be involved
13 to support any investigation into the incidents."

14 You say you:

15 "... raised with Mike Young that the responsibility
16 for the operational management and contractual
17 relationship management of the Horizon contact was in
18 the wrong part of [Post Office Limited] and should have
19 been under IT. As I have set out above, if there was
20 a significant incident involving Horizon, the Managed
21 Services team, supported by the separate IT Team, would
22 work together to investigate. The issue with this was
23 that the IT Team did not have full oversight of Horizon
24 (the contractual relationship with Fujitsu and
25 day-to-day management)."

11

1 **A.** It was quite a small operation and they were heavily
2 dependent upon Royal Mail at the time.

3 **Q.** Did that change?

4 **A.** It did change over time. It started through the
5 transformation, that was one of the key tenets, to build
6 the capability within that team.

7 **Q.** What were the implications of the IT function not being
8 adequately resourced with staff with appropriate
9 expertise?

10 **A.** So the IT function when I joined was very much --
11 I would describe as a change function. So they dealt
12 mainly with change activity and, again, when I started,
13 the operational management of Fujitsu in particular, and
14 the links back into Royal Mail, sat within another part
15 of Mike Young's area, which was under Andy McLean.

16 **Q.** You deal with where the responsibility for the
17 day-to-day operational service management of Horizon and
18 the management of the contractual relationship with
19 Horizon lay at paragraph 8 of your statement. Could we
20 go to that, please. It's page 4 and you say here:

21 "Initially, during my tenure as Head of IT and
22 Change the day-to-day operational service management of
23 Horizon and the management of the contractual
24 relationship with Fujitsu was the responsibility of the
25 Managed Services team. Andy McLean ..."

10

1 Pausing there, what were the potential repercussions
2 of the IT function not having full oversight of Horizon?

3 **A.** So coming from Northern Rock, where I had full oversight
4 of the operational side, as well as change, this was
5 very different and, certainly, from my perspective,
6 I didn't have a full view of the whole IT landscape and
7 I didn't feel at the time that there was sufficient
8 oversight in terms of looking at that particular
9 contract itself.

10 **Q.** Were there any specific incidents which led to you
11 forming this view?

12 **A.** I think we'll probably come to this but certainly the
13 audits.

14 **Q.** What aspects of the audits?

15 **A.** 1 -- so these are the E&Y audits. The first part,
16 nobody had taken ownership for the audits, which was --
17 I suppose that's the main point: nobody had actually
18 taken ownership of the audits.

19 **Q.** You go on:

20 "This changed when the Head of Managed Services left
21 in [Quarter 3/Quarter 4] 2011. From that point on, as
22 Head of IT and Change, I took responsibility for Service
23 Management, which included Horizon (the contractual
24 relationship with Fujitsu and day-to-day management)."

25 So by the third or fourth quarter of 2011, you had

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1 responsibility for Service Management and that included
 2 the day-to-day management and the contractual
 3 relationship management; is that right?

4 **A.** That's correct.

5 **Q.** Prior to this, you had responsibility only for IT change
 6 activity and providing support, if there were
 7 significant incidents, graded as P1 or P2, which
 8 required investigation. You define the P1 and P2
 9 gradings at paragraph 18 of your statement: P1s you say
 10 were a complete Horizon network outage; and P2s were
 11 technical issues affecting a significant number of
 12 branches?

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

14 **Q.** Is that right?

15 **A.** Yes.

16 **Q.** Looking, please, to paragraph 19 of the statement,
 17 towards the bottom of the page, you describe here the
 18 process for dealing with technical issues relating to
 19 Horizon. You say this:

20 "Prior to my taking responsibility for Service
 21 Management in [Quarter 3/Quarter 4] 2011, it was the
 22 responsibilities of the Managed Services team to inform
 23 me of these issues and engage with the IT Team. In some
 24 cases, these cases these issues would be escalated to
 25 the Executive. An incident review would then be carried

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1 for Service Management?

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

3 **Q.** Given your role within the business as Head of IT, do
 4 you think you ought to have attended at least some of
 5 those meetings, in order to understand the detail of the
 6 operation of Horizon, including issues which might be
 7 negatively affecting subpostmasters?

8 **A.** Typically, as Head of IT or CIO, you would not attend
 9 the weekly meetings and that would be largely because
 10 the executive meetings were there if there was anything
 11 in particular that would need to be escalated or even
 12 escalated outside of those meetings.

13 **Q.** As challenges to the integrity of the Horizon system
 14 came into greater focus, did you consider attending
 15 these meetings personally?

16 **A.** I didn't, because my priority -- this sounds awful -- my
 17 priorities were very much about separation and I had to
 18 trust my team, who were the experts, to escalate
 19 anything to me.

20 **Q.** Were you personally involved in any investigation into
 21 significant incidents?

22 **A.** I wouldn't say "investigate". I would be -- I would
 23 receive incident reviews and, out of those incident
 24 reviews there would certainly -- and I can't recall
 25 specifics but there would certainly be detailed

15

1 out by Fujitsu, who would provide a written response to
 2 [Post Office Limited]. Any significant issues would be
 3 discussed at the operational and executive supplier
 4 reviews with Fujitsu. I understood that operational
 5 reviews took place between Fujitsu and Service
 6 Management every week. I was not involved in these
 7 meetings. It is my understanding that executive reviews
 8 were not taking place prior to me taking responsibility
 9 for Service Management. Once I had taken
 10 responsibility, I attended executive meetings either
 11 monthly or bimonthly depending on the need with my
 12 senior team, a Fujitsu Account Executive, sales
 13 Executive and Service Executive."

14 You say that:

15 "... David Hulbert or the Duty Manager would
 16 communicate P1s and P2s to all key stakeholders across
 17 the business, keeping them updated [and you would
 18 assist] in communicating P1s and P2s at executive level,
 19 often by text message, telephone call, or in person."

20 Should the Chair understand from this paragraph that
 21 you did not at any point, when you were Head of IT and
 22 Change, attend the weekly operational Service Management
 23 review meetings between Fujitsu and the Post Office?

24 **A.** That's correct, I didn't.

25 **Q.** That's both before and after taking on responsibility

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1 discussions about those incidents themselves and,
 2 certainly, the resolution of those incidents.

3 **Q.** Did anyone from the Post Office IT Team have any direct
 4 involvement in the investigation of significant
 5 incidents?

6 **A.** The Service Management Team would have done.

7 **Q.** What part would they play in investigations?

8 **A.** So they would work very closely with Fujitsu on the
 9 incidents themselves and, in particular, to understand
 10 the detail. I think also -- and again, this is just
 11 from memory -- typically, you would get the architects,
 12 the Chief Architect involved in that as well, so that
 13 they could understand the low-level detail.

14 **Q.** Going, please, to page 7 of the statement and
 15 paragraph 14, towards the bottom of the page, you say:

16 "Around the time I joined [Post Office Limited] in
 17 April 2010, I recall that the second iteration of
 18 Horizon (HNG-X) was in the process of being rolled out.
 19 I understood that the changes were primarily as a result
 20 of a cost reduction exercise, a refresh of some of the
 21 hardware, and application changes to support
 22 [subpostmasters]."

23 Who was it who explained to you the reasons behind
 24 the change to Horizon Online?

25 **A.** I believe that would have been Mike Young and,

16

1 potentially, as I've said previously, the Chief
 2 Architect, which was David Gray at the time.
 3 **Q.** You go on:
 4 "I later understood that there was a level of
 5 resilience removed as part of the HNG-X rollout.
 6 Previously branches could continue to operate if the
 7 branch was unable to connect to the data centre, however
 8 HNG-X required the branches to be connected to the data
 9 centre to be operational. Coming from a banking
 10 background (where branches could continue to transact if
 11 they lost connectivity to the [database]) I had concerns
 12 about this from an operational resilience perspective
 13 (ie customers could not be provided with services if
 14 branches lost connectivity)."
 15 You say:
 16 "This issues was addressed in papers to the Board
 17 ..."
 18 Those two documents you reference there are from
 19 2012, by which time you were the interim Chief Operating
 20 Officer; is that right?
 21 **A.** That's right.
 22 **Q.** Had the concern about operational resilience developed
 23 prior to taking up that role, in other words when you
 24 were still Head of IT?
 25 **A.** It had and, at the time, I'd actually raised it with
 17

1 analysing and managing risk was a fundamental part of
 2 your executive responsibilities?
 3 **A.** Sorry, yes, yes.
 4 **Q.** Would you accept that, in order to discharge your
 5 responsibilities in relation to risk, as an executive,
 6 you needed to be proactive and curious about possible
 7 risk areas?
 8 **A.** Yes.
 9 **Q.** Where you identified a risk in carrying out your
 10 executive roles, what were the mechanisms in place for
 11 you to raise that risk with the Chief Executive Officer?
 12 **A.** So my reporting line was typically through another
 13 executive, not directly to the Chief Executive. So if
 14 there were any risks I would raise that with my line
 15 manager, who changed over time, so that that could get
 16 raised through to the Chief Executive.
 17 **Q.** Do you consider that the culture at the Post Office was
 18 supportive of executives reporting concerns about risk
 19 to the Chief Executive Officer?
 20 **A.** I think it was. I think that, probably latterly,
 21 I would say that there was very much -- there was
 22 a focus on risk. I think when I joined, I don't believe
 23 there was because I asked for a risk register when
 24 I joined and I couldn't -- there wasn't one for IT,
 25 which had to be built.
 19

1 Mike Young.
 2 **Q.** Was that before or after you took on responsibility for
 3 Horizon system day-to-day operation management?
 4 **A.** I can't recall specifically, I'm sorry.
 5 **Q.** Did you consider at the time, when you became concerned
 6 about operational resilience, whether this feature of
 7 Horizon Online, that is branch inability to transact if
 8 they lost connectivity to the data centre, had any
 9 implications for the accuracy of the branch transactions
 10 recorded by the system?
 11 **A.** No, I didn't.
 12 **Q.** Do you think you should have considered that?
 13 **A.** The way that the technology worked -- and if a branch
 14 couldn't connect to the data centre because of
 15 a material outage, they couldn't transact.
 16 **Q.** Moving then to your executive roles, the interim Chief
 17 Operating Officer role and then the Chief Information
 18 Officer role, accompanied in 2015 by the Operations
 19 Director role, what did you understand your
 20 accountabilities to the Chief Executive Officer to be?
 21 **A.** My accountabilities to the Chief Executive Officer? So
 22 I was responsible for -- I suppose there was key things
 23 that I was responsible for: delivering separation,
 24 delivering transformation and the IT service.
 25 **Q.** Did you recognise at the time that identifying,
 18

1 **Q.** When you took on the role as Chief Information Officer,
 2 you became the executive accountable for the contractual
 3 relationship with Fujitsu in respect of Horizon; is that
 4 right?
 5 **A.** Yes, that's correct.
 6 **Q.** Which you say at paragraph 9 of your statement included
 7 overall oversight of any change activity and provision
 8 of operational service from Fujitsu.
 9 **A.** Yes.
 10 **Q.** Do you think your colleagues at executive level relied
 11 upon your IT expertise to assist in their own response
 12 to issues involving the Horizon system?
 13 **A.** I would expect so but also my team as well.
 14 **Q.** You address discussions about the future use of Horizon
 15 at the Post Office at paragraph 66 of your statement.
 16 Could we have that on screen, please, it's page 32.
 17 About halfway down the page, you say:
 18 "I took a lead role in any discussions regarding the
 19 future use of Horizon at [Post Office Limited] and
 20 therefore have a clear recollection about this topic.
 21 These discussions took place throughout my tenure and it
 22 was a constantly evolving process. As set out above at
 23 paragraph 7 I was accountable for [Post Office
 24 Limited's] IT strategy post-separation with approval at
 25 executive and Board level. I would have taken in views
 20

1 from all key stakeholders across the business about the
 2 IT strategy (including the future use of Horizon) and
 3 would have ensured it aligned with [Post Office
 4 Limited's] business strategy. From early on in my
 5 tenure, it was clear that the Legal Team had concerns
 6 about the Fujitsu contract as it was originally formed
 7 in the 1990s and had never been out to public tender.
 8 It was therefore difficult to assess its value for
 9 money, particularly from a public purse perspective.
 10 I also recall concerns from other business stakeholders
 11 (ie Marketing and Retail) about how user-friendly
 12 Horizon was and the time it took to change when
 13 introducing business changes. In addition, technology
 14 had moved on significantly since Horizon was introduced.
 15 These concerns were continually raised and discussed
 16 throughout my tenure."

17 Did you consider subpostmasters to be stakeholders
 18 when you took up your Head of IT and Change role?

19 **A.** Yes.

20 **Q.** How did you obtain their views on the future use of
 21 Horizon?

22 **A.** I can't recall specifically. I would think that --
 23 again, I can't recall specifically. I don't want to
 24 guess.

25 **Q.** Well, can you recall at all how their views came to you?

21

1 **A.** Yes.

2 **Q.** Could we have the Ismay Report on screen, please. The
 3 reference is POL00026572. We can see here the title
 4 "Horizon -- Response to Challenges Regarding Systems
 5 Integrity", the date is 2 August 2010. It was sent by
 6 Mr Ismay, who was Head of Product and Branch Accounting
 7 at the time. Did you understand at the time you
 8 received this report that Product and Branch Accounting
 9 were involved in recovering apparent shortfalls in
 10 accounts from subpostmasters.

11 **A.** I didn't appreciate that at the time. It was quite
 12 early-on in my tenure at the Post Office.

13 **Q.** Looking at the "To" list, it's to Dave Smith, Managing
 14 Director; Mike Moores, Finance Director; Mike Young,
 15 Chief Technical and Services Officer. You are the third
 16 on the copy list, as Head of IT. Did you read the
 17 report in full when it was sent to you?

18 **A.** I believe I did.

19 **Q.** The introduction reads as follows:

20 "Post Office Limited has, over the years, had to
 21 dismiss and product a number of subpostmasters and Crown
 22 staff, following financial losses in branches. A small
 23 number of these have made counter claims that they were
 24 not guilty of the charges made but that the Horizon
 25 system was faulty.

23

1 **A.** So I know I did take time to visit some of the branches
 2 and I think, especially when we had gone into the later
 3 strategy, looking at the replacement of Horizon, I can
 4 remember -- I've got a vague memory of pulling together
 5 some forum to take in input from the stakeholders,
 6 subpostmasters, but I'm really struggling to remember.

7 **Q.** Turning, please, to paragraph 72 of the statement,
 8 that's page 36, you say:

9 "Any reviews of Horizon with regards to security and
 10 stability that had taken place over the previous years
 11 would have fed into the procurements and were
 12 considered."

13 With this in mind, I'd like to look, please, at the
 14 first review relating to the Horizon system, on which
 15 you were sighted when you took up the Head of IT and
 16 Change role, and that document is the Rod Ismay report.

17 You say at paragraph 16 of your statement that you
 18 received a copy of this, due to your role as Head of IT,
 19 shortly after you started with the Post Office and you
 20 were, in fact, copied in to Mr Ismay's report on
 21 2 August 2010; that's right, isn't it?

22 **A.** Yes.

23 **Q.** You say it was around this time that you first
 24 understood that there were challenges to the integrity
 25 of Horizon?

22

1 "Various lobby groups have been set up by former
 2 subpostmasters and these have at times received national
 3 media coverage and, in some cases, have been taken up by
 4 local MPs. Most recently, Channel 4 has proposed a news
 5 article about this area.

6 "This paper has been compiled as an objective,
 7 internal review of [Post Office Limited's] processes and
 8 controls around branch accounting. It includes
 9 an overview of:

10 "[Post Office Limited's] control environment and
 11 [Post Office Limited's] response to accounting errors
 12 "IT systems -- Horizon versus Horizon Online and
 13 resolution of known issues

14 "Third party perspectives -- court judgments, media
 15 and audit [and]

16 "Statistics on branch accounting issues, suspensions
 17 and prosecutions."

18 Pausing there, at the time, did it strike you as odd
 19 that this review, done by someone from within the Post
 20 Office, the Head of Product and Branch Accounting, was
 21 being described as "objective"?

22 **A.** I can't remember what I thought at the time.

23 **Q.** What was your understanding at the time of why Mr Ismay
 24 was preparing this report, rather than a Post Office
 25 employee with IT expertise?

24

1 **A.** I don't know the answer to that, I'm sorry. I can only
2 guess and assume that it was because Rod had a huge
3 amount of experience across the business and understood
4 the controls that sat around the system. I also -- and
5 again, I'm trying to remember and I can't remember
6 because I wasn't involved in this part, but I believe --
7 not believe, I think -- some of the IT architects might
8 have been included in this, to provide input to it.

9 **Q.** What did you understand to be the reason for this report
10 having been produced?

11 **A.** I didn't know the reason why it was produced.

12 **Q.** Before we go to the Executive Summary of the report
13 could we look, please, to page 19 of this document.
14 Under 4(c), "Independent Review and Audit Angles", we
15 have this:

16 "[Post Office Limited] has actively considered the
17 merits of an independent review. This has been purely
18 from the perspective that we believe in Horizon but that
19 a review could help give others the same confidence that
20 we have.

21 "Our decision between IT, Legal, P&BA, Security and
22 Press Office has continued to be that no matter what
23 opinions we obtain, people will still ask 'what if' and
24 the defence will always ask questions that require
25 answers beyond the report. Further such a report would

25

1 **A.** I think at this point I didn't really understand how
2 Post Office was prosecuting subpostmasters because
3 I just -- I just didn't have line of sight of this, and
4 I can't remember reading this, this detail, at the time.

5 **Q.** Going back then, please, to page 1 of the document to
6 the "Executive Summary". The first three paragraphs say
7 this:

8 "The allegations to which we are responding follow
9 on from cases where thousands of pounds were missing at
10 audit. We remain satisfied that this money was missing
11 due to theft in the branch -- we do not believe the
12 account balances against which the audits were conducted
13 were corrupt.

14 "[Post Office Limited] has extensive controls
15 spanning systems, processes, training and support.
16 Horizon is robust, but like any system depends on the
17 quality of entries by the users. Horizon Online builds
18 on this and brings benefits to running costs and change
19 management. It is not being done because of any doubt
20 about the integrity of Horizon.

21 "The integrity of Horizon is founded on its tamper
22 proof logs, its real time back ups and the absence of
23 'backdoors' so that all data entry or acceptance is at
24 branch level and is tagged against the log on ID of the
25 user. This means that ownership of the accounting is

27

1 only have merit as at the date of creation and would
2 have to be updated at the point at which Horizon or the
3 numerous component platforms were upgraded."

4 You had, by this point, been Head of IT for around
5 four months, having taken up the role in April. Were
6 you the IT representative who contributed to the
7 decision not to commission an independent review?

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

9 **Q.** Do you know who was?

10 **A.** I don't know who was.

11 **Q.** Going over the page, please, first paragraph here reads:

12 "It is also important to be crystal clear about any
13 review if one were commissioned -- any investigation
14 would need to be disclosed in court. Although we would
15 be doing the review to comfort others, any perception
16 that [Post Office Limited] doubts its own systems would
17 mean that all criminal prosecutions would have to be
18 stayed. It would also beg a question for the Court of
19 Appeal over past prosecutions and imprisonments."

20 Did you read this part of the report when you
21 received it?

22 **A.** I can't recall if I did.

23 **Q.** Do you recall having any concern about the description
24 here that the investigation would need to be disclosed
25 in court and a worry about that?

26

1 truly at branch level."

2 Then over the page, please, second paragraph down:

3 "Accounting errors do happen through user mistakes,
4 but these can be explained and resolved case by case.
5 Systems issues have also arisen but again [Post Office
6 Limited] has been able to explain them and rectify them.
7 Whilst they have affected the availability and
8 functionality of the system, with consequent impacts on
9 customers and clients, they do not bring the integrity
10 of the system into question."

11 Then:

12 "When [Post Office Limited] takes a subpostmaster to
13 court we have strong processes for the compilation of
14 evidence, compassionate factors are borne in mind and we
15 have a high success rate. This does depend on ensuring
16 that the courts focus on the facts of transaction logs
17 and not on speculation about the 'what ifs'."

18 Would you agree that it is quite clear from both the
19 introduction to this report and the last paragraph that
20 I've just read out from the executive summary that
21 subpostmasters were being prosecuted and dismissed in
22 reliance on Horizon data, setting aside for a second the
23 question of who was doing the prosecuting?

24 **A.** Yes, that's how it reads.

25 **Q.** You say at paragraph 31 of your statement that you

28

1 understood from the Ismay Report that Horizon data was
2 being used as part of the supporting evidence in
3 prosecutions and the importance of the integrity of the
4 data; is that right?

5 **A.** Yes.

6 **Q.** But you say you do not recall appreciating that Post
7 Office could prosecute individuals itself without
8 referral to external authorities, and you say you didn't
9 realise that until around the time of the Second Sight
10 review. Looking at that introduction and the
11 penultimate paragraph here, the one I've just read out,
12 on the executive summary, on the face of the document,
13 wasn't it quite clear that, not only were subpostmasters
14 being prosecuted in reliance on Horizon data, they were
15 being prosecuted by the Post Office?

16 **A.** At the time when I've read -- so I don't recall thinking
17 that Post Office prosecuted subpostmasters at that time.
18 It was really not until the time of the Second Sight
19 Report that I really started to understand and
20 appreciate it because I just wasn't close enough to that
21 at this time.

22 **Q.** Looking, please, to some of the detail around systems
23 issues which were raised in Mr Ismay's report, it's
24 page 3 of the document, please. Under 1(a) "Systems",
25 the second paragraph in the box says:

29

1 saw that this was a top priority for IT?

2 **A.** I really don't recall specifically reading this point.

3 **Q.** Going, please, to page 6, under the second bullet point
4 there is a heading "IT systems interventions and
5 response to outages/disconnections", and the bullet
6 point under that reads:

7 "Incomplete transactions -- systems could fail or
8 lines could be disconnected during online banking
9 transactions. This could mean that customer money has
10 changed hands without the system being update or vice
11 versa. IT controls would detect these outages and raise
12 recovery alerts to the branch such that the branch can
13 check and update the accounts if needed. This has been
14 a more frequent issue recently with 'screen freezes' and
15 'POCA outages' but recovery instructions have been
16 issued to branches and enable them to deal with any
17 issues."

18 Given that this report was being produced in the
19 context of challenges to Horizon integrity, raised in
20 the context of prosecutions of subpostmasters and those
21 prosecutions were said to rely on transaction logs, did
22 this paragraph in the report concern you at all?

23 **A.** I don't recall reading this in detail. Sorry, I just
24 don't recall what action I did or didn't take out of
25 this report.

31

1 "Failures in systems and file transfer do happen,
2 but [Post Office Limited] has controls to detect these.
3 The frequency of file transfer failures has been
4 unacceptably high recently and is a top priority for
5 IT."

6 What did you understand by systems and file transfer
7 failures at the time?

8 **A.** I wouldn't have understood anything about that at the
9 time because that's an operational issue and that sat
10 within a separate line, which was Andy McLean.

11 **Q.** That was Managed Services, was it?

12 **A.** That was Managed Services.

13 **Q.** So were you not aware that the frequency of file
14 transfer failures was a top priority for IT, that is
15 your team, at the time?

16 **A.** I wouldn't have been and the likelihood is, I think it
17 would have all been within the operational side and it
18 says IT but I don't recall anything to do with this.

19 **Q.** Shouldn't someone have told you that this was a top
20 priority for IT, the frequency of file transfer
21 failures?

22 **A.** If it was -- so if someone in my team was dealing with
23 it, yes. But that looks as if it's an operational
24 issue.

25 **Q.** So you read this report. What did you think when you

30

1 **Q.** Was your team asked by Mr Ismay to comment on the impact
2 of the systems issues referred to in the report, on the
3 integrity of the data being produced by the system?

4 **A.** If I recall correctly, David Gray, who was the Chief
5 Architect, he worked closely with Rod Ismay on this
6 report.

7 **Q.** Going, please, to page 17 of this document, the section
8 on "Third Party Comment". Under 4(a) "Court Decisions",
9 the first two paragraphs read as follows:

10 "There have been cases, when taken to court by [Post
11 Office Limited], where the defence has claimed that the
12 accounting system Horizon was at fault and that there
13 were incidents such as 'ghost transactions' or
14 'electrical supply issues' which have corrupted the
15 Horizon records.

16 "With 2 notable exceptions, [Post Office Limited]
17 has been able to rebut these assertions by ensuring
18 a focus on the facts of the Horizon transaction logs and
19 a request for the defence to be specific about which
20 transactions they consider to be 'ghost' and why."

21 One of the notable exceptions is addressed about
22 halfway down this page, point 1, "Cleveleys, (2001)".
23 It explained:

24 "... subpostmistress dismissed in 2001 soon after
25 Horizon was introduced. The defence produced a report

32

1 which showed how Horizon 'could' have caused an error
2 and [Post Office Limited] did not have the audit
3 transaction logs to refute the claim."

4 Do you recall reading about this reference to
5 a report which showed how Horizon could have caused
6 an error?

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

8 **Q.** That should have worried you, shouldn't it, as Head of
9 IT, that there was a report out there saying that
10 Horizon could have caused an error?

11 **A.** I think if I recall correctly, at the time of this
12 report, I'm sure I would have had some discussions with
13 the Chief Architect and a lot of these issues were seen
14 as Legacy issues to do with old Horizon. At the time,
15 I just can't -- I'm really struggling to recall this
16 report at the start of -- what, three months after
17 I joined. I'm really struggling to remember this in
18 detail. Again, I'd come in just very much to focus on
19 separation and some of these issues in here were
20 operational issues.

21 **Q.** You've explained how, looking forwards, this would have
22 been seen as a Legacy Horizon issue but, looking
23 backwards for a moment in the context of a report
24 raising challenges to Horizon integrity, did you
25 consider the implications for those who had been

33

1 mind the integrity of the system. So, as long as you
2 know what it is, you know how to resolve it and you drew
3 the appropriate post-incident reviews and you've got
4 full sight of all of the data and the facts, that should
5 retain that.

6 **Q.** What questions did you ask and of whom when you read the
7 report?

8 **A.** I really can't remember. I'm sorry.

9 **Q.** Did you consider the processes which were in place to
10 ensure that Product and Branch Accounting, Contract
11 Managers and those involved in criminal investigations
12 and prosecutions, were kept informed about any systems
13 issues which had the potential to impact on transactions
14 data?

15 **A.** So I wouldn't be able to comment at that time because
16 communication would have been through Service
17 Management.

18 **Q.** When you were Head of IT, was there a central repository
19 within the Post Office for information about P1 and P2
20 incidents, which could be accessed by other departments
21 and teams?

22 **A.** There was a process in place called duty manager, which
23 basically would inform all key stakeholders across the
24 business.

25 **Q.** Did anyone tell you, as Head of IT, or later in your

35

1 prosecuted based on Horizon Legacy data?

2 **A.** At the time, I really didn't understand. I mean,
3 obviously now, you'd look at it in a different light
4 altogether but, at the time, I didn't really appreciate
5 the legal process and, from a legal perspective, that
6 wouldn't be for me to comment.

7 **Q.** Going back, please, to the executive summary, page 2,
8 the second paragraph down, which we've already read out.
9 The summary in that second paragraph relating to systems
10 issues that they have arisen but, again, Post Office
11 Limited has been able to explain them and rectify them,
12 there's a very short conclusion:

13 "Whilst they have affected the availability and
14 functionality of the system with consequent impacts on
15 customers and clients, they do not bring the integrity
16 of the system into question."

17 You say in your statement that you took Mr Ismay's
18 report at face value but, having read the report, given
19 your knowledge and background in IT, were you not
20 concerned to better understand Mr Ismay's logic and
21 conclusion?

22 **A.** So I can't comment for what Mr Ismay has said but, from
23 an IT perspective, if there is an issue or a fault, the
24 important points are always to understand what the issue
25 is, rectify the issue, and that would maintain in my

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1 executive roles, that the Post Office was bound as
2 a prosecutor to ensure the recording of information of
3 relevance to its prosecutions?

4 **A.** I can't recall specifically.

5 **Q.** Did you have any concept, when you were in any of your
6 roles at the Post Office, that it might be important for
7 the Post Office to record information about IT issues
8 which might affect data upon which it relied to
9 prosecute and take other action?

10 **A.** So, from an IT perspective, we would -- it's business as
11 usual to maintain information about faults and issues
12 and resolution.

13 **Q.** Were there established channels through which
14 information might be requested about technical Horizon
15 issues by Post Office lawyers, or was this done on
16 an *ad hoc* basis?

17 **A.** I'm not sure. Is this -- sorry, just to clarify, is
18 this from Fujitsu or is that just from internally within
19 the IT function?

20 **Q.** Well, taking it in general terms, and being -- well,
21 being specific, lawyers involved in prosecutions, so,
22 initially, Royal Mail Group Legal lawyers and later Post
23 Office lawyers, in terms of information, was there an
24 established way for them to obtain that information --

25 **A.** I don't --

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- 1 **Q.** -- from IT about technical Horizon issues?
- 2 **A.** The only thing I was aware of -- and this came very much
3 later, once I took over the contract -- was a process to
4 get data between the lawyers and I think Fujitsu. In
5 terms of faults and issues, I don't recall anything.
- 6 **SIR WYN WILLIAMS:** Can I just ask, Ms Sewell, we've
7 obviously heard a good deal of evidence about the
8 Fujitsu processes for dealing with -- I'll just use the
9 word "defects" -- we've heard about PEAKs and KELs,
10 et cetera. Did the Post Office always go to Fujitsu --
11 in your experience, obviously you can only speak for the
12 time you were there -- but if there was something that
13 occurred with the IT system, was it always "Go to
14 Fujitsu to find the answer", or did you have your own
15 processes for finding the answer, either first, shall we
16 say, or -- well, just never mind about first, did you
17 have your own processes for looking at problems and
18 trying to solve them?
- 19 **A.** So purely from an IT perspective, because Fujitsu
20 effectively ran the system and they had the IPR,
21 effectively, we would always look to go to Fujitsu.
- 22 **SIR WYN WILLIAMS:** Right.
- 23 **A.** The team would work together because you would
24 understand what the business impact was, so what's the
25 business impact, to be able to investigate the cause.

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- 1 policy wouldn't necessarily be set by IT. That would
2 typically be set by somebody like Information Security,
3 or the Data Protection Officer of the organisation, and
4 that could be within Royal Mail or Post Office. They
5 would set the policy and then the departments, including
6 IT, should adhere to that policy.
- 7 **SIR WYN WILLIAMS:** Sorry, Ms Price; I may have been
8 trespassing on some of your questions, but --
- 9 **MS PRICE:** Not at all, sir.
- 10 **SIR WYN WILLIAMS:** -- I was just getting those thoughts out
11 at this time.
- 12 **MS PRICE:** We look ad earlier at paragraph 19 of your
13 statement, in which you said that P1s and P2s would be
14 communicated to all key stakeholders across the
15 business. Were the Investigators -- that is the
16 Security team, Investigators who were criminally
17 investigating subpostmasters and others -- were they
18 considered key stakeholders for those purposes?
- 19 **A.** I can't remember specifically but I do think Information
20 Security was included.
- 21 **Q.** Can you recall whether the relevant legal teams, that is
22 the lawyers involved in prosecutions and debt recover
23 recovery, were key stakeholders for this purpose, that
24 is the communication of P1s and P2s?
- 25 **A.** I can't recall who was on that list, but what I can say

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- 1 But the cause would have to be determined by Fujitsu.
- 2 **SIR WYN WILLIAMS:** All right. So how would you, the Post
3 Office Limited, ensure that relevant documentation about
4 a particular problem which was generated by the Post
5 Office, even if it was only to ask Fujitsu to help, how
6 would you ensure that that documentation would be
7 retained and kept for an appropriate period of time?
- 8 **A.** I think the only thing I would go back to is the
9 retention policy on documents.
- 10 **SIR WYN WILLIAMS:** Right. So there was a retention policy
11 throughout the period that you were there?
- 12 **A.** I can't speak for the whole period that I was there,
13 because, from what I remember, when -- and, again,
14 I think this is just a vague memory -- when I took over
15 Information Security, that was an area where we did look
16 at, was the retention policy. But I think typically it
17 was something like about seven years, if I -- and I've
18 seen that in some of the documents that I've been
19 provided.
- 20 **SIR WYN WILLIAMS:** Was it the IT Department itself which had
21 a retention policy or was it a policy that applied
22 throughout all departments of the business?
- 23 **A.** So, typically you would expect, in an organisation --
24 and again, I'm just -- I'm trying to remember but,
25 typically, you would have that set -- the retention

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- 1 if it was a P1 and if that was communicated to all the
2 execs, that would have included those as well.
- 3 **Q.** Having received Mr Ismay's report, do you think that
4 you, as Head of IT, should have raised the issue of
5 information flow within the Post Office between the
6 relevant teams and departments?
- 7 **A.** At -- and this is where it's difficult because, at that
8 time, that responsibility lay -- although it was under
9 Mike Young, it lay within Andy McLean's area.
- 10 **Q.** When you took up the role as Head of IT, did you ask
11 what documentation might be in the Post Office IT
12 Department's possession to assist with the role of
13 overseeing IT systems?
- 14 **A.** Yes, I did.
- 15 **Q.** What were you told?
- 16 **A.** I was given -- I don't believe I was given a lot of
17 documentation at the time.
- 18 **Q.** Were you given, for example, release notes?
- 19 **A.** No.
- 20 **Q.** Major incident reports?
- 21 **A.** So the first major incident reports that I would have
22 seen would have been whilst I was CIO.
- 23 **Q.** Did you have any sight of NBSC call records --
- 24 **A.** No, not at all.
- 25 **Q.** -- or Service Management documents?

40

1 **A.** I would have seen a high-level Service Management so, in
 2 terms of service availability but I think that would
 3 have been -- so probably end of 2011/into 2012, once
 4 I took some responsibility.

5 **Q.** Do you think that you should have asked to see more
 6 documentation in relation to oversight of the IT system,
 7 Horizon system?

8 **A.** So, when I wasn't responsible, I don't think so. But
 9 when I was responsible, I would see documentation and
 10 I would see executive summaries. In the role of CIO,
 11 you wouldn't get into that level of detail,
 12 unfortunately.

13 **Q.** I'd like to turn, please, to Post Office awareness of
 14 relevant bugs, errors and defects in Horizon following
 15 the Ismay Report, starting, please, with the receipts
 16 and payments mismatch bug. Can we have on screen,
 17 please, POL00294684. This is an email from Antonio
 18 Jamasb on 15 November 2010.

19 Apologies, it relates to a proposed meeting on
 20 15 November 2010 to discuss a proposal for receipts and
 21 payments resolution. The first invited attendee listed
 22 was David Hulbert, who was listed as a required
 23 attendee. Was Mr Hulbert in your team at that time,
 24 November 2010? I know he was later a direct report.

25 **A.** No, he wasn't. He reported to me some 12 months later.

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1 doesn't resolve the issue at branches that already have
 2 the issue."

3 On the next page, some solutions are set out. We'll
 4 come back to those in due course. Were you aware of
 5 this meeting taking place at the time?

6 **A.** No.

7 **Q.** We have a note of the meeting, which took place to
 8 discuss the issue. Can we have that on screen, please.
 9 The reference is FUJ00082110. We do not see
 10 Mr Hulbert's name on the list but we do see Ian
 11 Trundell's name listed next to "IT", so it appears that
 12 he was the representative for IT at this meeting; would
 13 you agree?

14 **A.** Yes.

15 **Q.** Also present were representatives from Post Office
 16 Service Delivery, Post Office Security, Post Office
 17 Network, Post Office Finance, and various
 18 representatives from Fujitsu. So it would appear that
 19 the receipts and payments mismatch bug was known about
 20 across these major relevant departments within the Post
 21 Office at the time, would you agree?

22 **A.** Yes.

23 **Q.** Did Mr Trundell report the outcome of this meeting to
 24 you at the time?

25 **A.** I don't recall him speaking to me about it.

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1 **Q.** Also listed was Ian Trundell, was he in the Post Office
 2 IT Department?

3 **A.** I think he may have been an architect.

4 **Q.** Did he report to you?

5 **A.** No, he didn't.

6 **Q.** The body of the email, if we can scroll down a little
 7 please, contains a summary of the problem, explained in
 8 the first three paragraphs. It says:

9 "The aim of the meeting is to discuss the working
 10 group proposal: to resolve discrepancies generated by
 11 branches following a specific process during the
 12 completion of the trading statement.

13 "Service Delivery recently became aware of an issue
 14 whereby if a certain process was followed during
 15 completion of the trading statement any discrepancy the
 16 branch was carrying, either positive or negative, would
 17 'drop' from the Horizon system, but still show within
 18 the Credence system.

19 "Few branches were aware of the issue, but it
 20 creates questions around whether the Horizon system can
 21 cause losses or gains. However it also highlights
 22 positives in our management of the system, because once
 23 the issue arose we were able to highlight it, quickly
 24 investigated the problem and then ring-fence the issue
 25 while ascertaining a fix to stop it recurring, but it

42

1 **Q.** Were you sent this note of the meeting?

2 **A.** I don't believe so.

3 **Q.** I should be clear about that. Were you sent the note of
 4 this meeting at the time, in 2010?

5 **A.** I don't believe that I was.

6 **Q.** Could we have on screen, please, POL00029611. You
 7 appear to have been involved in the response to the
 8 receipts and payments issue in March 2011. The email,
 9 starting about halfway down the page, is from Will
 10 Russell to you, copied to Andy McLean.

11 It appears from the sign-off at the bottom that
 12 William Russell was a Commercial Adviser in the Post
 13 Office Service Delivery Team, and it's dated 4 March
 14 2011. The subject is "Receipts and payments issue", and
 15 it says:

16 "Lesley
 17 "Quite a lot of info here but I will outline what we
 18 agreed on this issue.

19 "Word documents attached are the letters going out
 20 to branches on Monday. They have been approved by Legal
 21 and P&BA (Andy Winn) and SD (Tony J).

22 "I ran Mike G, Mike Y and Andy M through the detail
 23 last week. We have agreed to write off the losses and
 24 repay the gains via subpostmaster pay. We have
 25 a document from Fujitsu on what happened (see pdf file).

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1 This provides audit trail and shows what happened for
2 a branch, as well as events generated and logged by
3 Fujitsu, plus what the branch saw on their reports.
4 I am just awaiting clearance from network (Anita Turner)
5 re how to approach NBSC (propose to finalise that on
6 Monday for 62 branches affected as shown on Excel
7 sheet).

8 "Matt Hibbard was happy with the process and Fujitsu
9 document, as Rod was off. Andy Mac has taken action
10 from Mike Y to ensure we maintain closer links with
11 P&BA/Rod. Tony J ... is already working on issue
12 management and how P&BA raise issues with SD, and this
13 will help SD to formally raise and resolve them with
14 Fujitsu.

15 "Both Mikes were keen we use this as a positive,
16 eg old Horizon would not have picked this up, yet the
17 logs in Data Centre, and Event alerting meant we picked
18 this up, and can demonstrate through reports what
19 happened. We can generate reports for each branch if
20 challenged.

21 "We are writing to branches, and following up with
22 call from NBSC/P&BA with walkthrough of the detail as
23 required. We have commitment from Fujitsu to visit any
24 branches to run them through what happened with them.
25 We have had receipt and payments mismatches before, so

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1 me at the time.

2 **Q.** This particular issue had been resolved with the
3 affected branches?

4 **A.** Yes.

5 **Q.** But did you consider what the implications of this were
6 for other branches or past issues that might have arisen
7 where there may have been action taken against
8 a subpostmaster and others?

9 **A.** I can't recall if I did or didn't.

10 **Q.** Did you consider whether information relating to this
11 bug should be shared with those involved in dismissals,
12 contract terminations, prosecutions and debt recovery?

13 **A.** I wasn't close enough to understand what was happening
14 on that side of the business and I think this was
15 a major issue with the different responsibilities
16 between operational management and change.

17 **Q.** Did you consider at all whether this cast doubt on the
18 reliability of the Horizon transactions data being used
19 in support of action against subpostmasters and others?

20 **A.** I don't recall that I would have because it looked as
21 if, on the face of it, the problem had been solved.

22 **Q.** This was one of the bugs or defects referred to in the
23 Interim Second Sight Report, wasn't it?

24 **A.** Yes, it was.

25 **Q.** Could we have on screen, please, POL00029618. This is

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1 this is not something new to manage, albeit that this
2 issue was very complicated in how it was reported, and
3 evident to the branch."

4 Picking up, first of all, on that last sentence in
5 the penultimate paragraph, "We have had receipts and
6 payments mismatches before"; can you help with what this
7 is referring to?

8 **A.** I don't know, I'm sorry.

9 **Q.** Did you question at the time what it was being referred
10 to here, in terms of past receipts and payments
11 mismatches?

12 **A.** I can't recall at all.

13 **Q.** But it appears that this was not the first time that
14 this type of issue had arisen?

15 **A.** That's what it appears.

16 **Q.** This particular receipts and payments mismatch issue had
17 come up around three months after Mr Ismay's report and
18 you seem to have been involved in the response by March
19 2011, so seven months after Mr Ismay's report. Did this
20 issue cause you to question the conclusions reached by
21 Mr Ismay in his report at all?

22 **A.** I can't recall that it did, because -- I really don't
23 recall that it did because this was under -- this was
24 being managed separately, and Mike Young's referenced as
25 well, so it wouldn't have registered as a major issue to

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1 an email chain from June 2013.

2 **A.** Mm-hm.

3 **Q.** In it, Ron Warmington is seeking clarification as to
4 whether anyone at Board level was aware of the receipts
5 and payments mismatch bug and, if so, who and when?

6 **A.** Yes.

7 **Q.** Your email is at the top.

8 **A.** Yeah.

9 **Q.** It's 25 June 2013 to Simon Baker and Alwen Lyons, and
10 you say this:

11 "Simon, I don't know if it went higher than Mike,
12 Andy Mc also managed the service at the time and if
13 I remember correctly Mark Burley was also involved.

14 "I can't say whether we said anything to the press.

15 "Other points -- our Board at the time would have
16 been Royal Mail as we didn't have an independent Board.
17 Paula would have been Network Director at the time with
18 Dave Smith as MD."

19 Who was the "Mike" who you're referring to here?

20 **A.** Mike Young.

21 **Q.** "Andy Mc", was that Andy McLean?

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

23 **Q.** Mark Burley, what was his role in 2010 to '11?

24 **A.** He was heading up the rollout of HNG-X.

25 **Q.** When you were involved in the response to the receipts

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1 and payments mismatch bug in March 2011, you were Head
 2 of IT. Who did you report this issue up to?
 3 **A.** The receipts and payments issue?
 4 **Q.** In March 2011?
 5 **A.** March 2011? I didn't report it up to Mike because Mike
 6 was already aware of it, Mike Young. So I reported to
 7 Mike Young at the time.
 8 **Q.** Did you report it to anyone else?
 9 **A.** I wouldn't have done because it was -- it's -- the
 10 reporting line for operational management and management
 11 of faults was Andy McLean up to Mike. So Mike was well
 12 aware of this fault.
 13 **Q.** Can you help with your comment here about there not
 14 being a Post Office Board at the time, presumably
 15 meaning at the time the receipts and payments mismatch
 16 bug came to light in 2010?
 17 **A.** Yeah, because I think at that time it was prior to
 18 separation. So we were still governed by Royal Mail at
 19 that time and I wasn't aware that -- and I don't think
 20 we had an independent Board. There was an Executive
 21 Team and I think David Smith may have sat on the board
 22 at Royal Mail.
 23 **Q.** Can you help to any greater degree than you have with
 24 your comments in this email with how high up the
 25 knowledge of the receipts and payments mismatch bug went

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1 (11.07 pm)

(A short break)

3 (11.20 am)

4 **MS PRICE:** Hello, sir. Can you still see and hear us?5 **SIR WYN WILLIAMS:** Yes, indeed.6 **MS PRICE:** Could we have on screen, please, POL00294852.

7 This is an email chain from September 2011. So at this
 8 point, you were still in the Head of IT role. Starting,
 9 please, with the first email in this chain, dated
 10 28 September 2011, that's page 2 of this document, there
 11 is an email from Gary Blackburn, just scrolling down,
 12 please, who is IT and Change. So was that your team?

13 **A.** Yes.

14 **Q.** Scrolling up, please, this is to a number of recipients,
 15 including you, Dave Hulbert and Alison Bolsover. The
 16 subject is "Camelot -- Missing Data in POLSAP", can you
 17 just help with what POLSAP was?

18 **A.** So the -- it was Post Office -- I don't remember the
 19 technicalities of POLSAP but it was, in technical terms,
 20 it was a SAP system.

21 **Q.** Mr Blackburn explains the issue in this way under "What
 22 has happened":

23 "The root cause is still to be determined but P&BA
 24 colleagues have identified that there is data missing
 25 within POLSAP. The missing relates to multiple rem

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1 prior to it being discussed in the context of Second
 2 Sight's work in 2013?

3 **A.** I don't know. I gave as much information as I had at
 4 the time.

5 **Q.** Given your knowledge from the Ismay Report that Horizon
 6 data was being relied upon to dismiss and prosecute
 7 individuals, when you first found out about the receipts
 8 and payments mismatch bug or bugs, did you consider
 9 discussing the potential wider implications of this with
 10 Product and Branch Accounting?

11 **A.** I can't -- I can't recall if I did because I wasn't
 12 actively involved in this particular fault at the time.

13 **Q.** Or anyone from Network?

14 **A.** I really wasn't involved in this fault at the time.

15 **MS PRICE:** Sir, I wonder if that might be a convenient
 16 moment for the morning break.

17 **SIR WYN WILLIAMS:** Yes, by all means. So what time shall we
 18 resume?

19 **MS PRICE:** I think ten minutes takes us to 11.15, please,
 20 sir.

21 **SIR WYN WILLIAMS:** By my clock, because I want to ensure we
 22 have a full ten minutes, it's 11.07.

23 **MS PRICE:** Very happy to come back at 11.20, sir.

24 **SIR WYN WILLIAMS:** All right, that's fine, thank you.

25 **MS PRICE:** Thank you.

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1 undertaken on [a number of dates in September]. The
 2 affected transactions are when the rem was for the same
 3 product, same value and completed on the same day
 4 (appears like a duplicate rem). The data is zero value
 5 stock data, which is rem in/rem out products such as
 6 Camelot scratchcards and MVL tax discs.

7 "In total we have 71 products that are classed as
 8 zero value stock data."

9 The "Impact" is:

10 "Because the data is missing within POLSAP, P&BA
 11 have understandably issued transaction corrections to
 12 branches that appear to have not conformed to business
 13 process.

14 "309 branches within branch trading group C have
 15 received TCs inappropriately.

16 "90 of those branches have complained to P&BA and
 17 explained that they will not be processing the TC."

18 Would you agree that Mr Blackburn appears to be
 19 identifying a problem where branch transaction data went
 20 missing?

21 **A.** I don't know whether it's branch transactional data.

22 **Q.** Can you help with what it is?

23 **A.** Because the branch transactional data would have been
 24 held within Horizon, not POLSAP. So that was my
 25 understanding.

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1 Q. Looking down to the "Resolution":
 2 "Fujitsu are presently working on the identification
 3 of the missing data and are devising a plan to get that
 4 data into POLSAP."
 5 This seems to have involved Fujitsu.
 6 A. Mm-hm.
 7 Q. "At the moment the fix is not expected to be available
 8 until the middle of next week ..."
 9 It says at the end of this paragraph:
 10 "It was decided by P&BA and myself that we would not
 11 communicate this wider at this stage as we do not wish
 12 to raise concerns about Horizon integrity."
 13 Does that help at all with the context for this?
 14 A. So I can't remember the issues specifically but Fujitsu
 15 hosted POLSAP as well and there was obviously a concern
 16 from Rod, as part of this, but when I saw this in the
 17 pack, I really struggled to remember this particular
 18 incident.
 19 Q. Why would it be related to concerns about Horizon
 20 integrity?
 21 A. So I can only assume, you know, what Gary's written and
 22 obviously from Rod, that -- because it's relating to
 23 data. That's all I can assume.
 24 Q. What did you think about the decision that this was not
 25 going to be communicated more widely as they did not

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1 seeing a number of data issues and the perception is
 2 that this is getting worse. Can you please work with
 3 one of Rod's team to quantify/qualify what these issues
 4 are -- I would like to understand if we have any
 5 systemic issues."
 6 What is your concern about this; is this relevant to
 7 branch accounts or not?
 8 A. I can't remember but if this -- and it obviously
 9 reference transaction corrections, so there's obviously
 10 a piece of work needed to be done to ensure that the
 11 branch transactions were kept up to date and
 12 appropriate. So my concern would have been "It looks
 13 like a data issue, can we get to the bottom of it,
 14 please, and understand what this is".
 15 Q. It appears, doesn't it, on the description, as though it
 16 is an issue, whatever the issue is --
 17 A. Mm-hm.
 18 Q. -- which has affected branch accounts --
 19 A. Yes.
 20 Q. -- because there are transaction corrections which have
 21 been wrongly issued, which need to be reversed. What
 22 was your concern about the systemic issues or potential
 23 systemic issues?
 24 A. And again, from an IT perspective, if there's a material
 25 issue with data, you need to understand what that issue

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1 wish to raise concerns about Horizon integrity?
 2 A. So, as an IT person -- and I say this throughout my
 3 career -- it is important to be transparent about issues
 4 and I would always advocate that. There may be a point
 5 which you want to understand an issue first before you
 6 communicate, and I can only assume that's been the
 7 discussion between -- because I think this was from
 8 Gary, and it references P&BA, so I can only assume
 9 that's Rod as well.
 10 Q. Going back to page 1 of this document, please, and
 11 scrolling down a little, please. We can see you
 12 forwarding this on to Kevin Lenihan --
 13 A. Mm-hm.
 14 Q. -- copied to Dave Hulbert and Rod Ismay on 29 September
 15 2011. What was Mr Lenihan's role?
 16 A. So Kevin worked within Service Management and he
 17 reported directly through to Dave Hulbert. He was
 18 located in Chesterfield so he was quite close to Rod
 19 Ismay's area, so it would have been easy for him to pick
 20 this up and go into a lot of detail with Rod to
 21 understand what the issues were.
 22 Q. You say this:
 23 "Kevin
 24 "I would like you to pick up a piece of work on
 25 behalf of Rod and I -- Rod has concerns that we are

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1 is. So systemic, to me, is widespread.
 2 Q. Did this make you question the integrity of Horizon at
 3 all?
 4 A. I can't remember, sorry.
 5 Q. Could we have on screen, please, POL00142676. Starting
 6 please towards the bottom of page 2 of this document,
 7 an email from Adrian Baker to you, dated 3 January 2012,
 8 and the subject is "Branch feedback". We can see from
 9 top of the next page that Mr Baker was Head of Strategy
 10 at the Post Office and his email to you reads:
 11 "Lesley,
 12 "First of all -- happy new year!
 13 "Secondly, a quick but if of feedback/question from
 14 my time in branch before Christmas. There seems to be
 15 a slight glitch with the Quantity function, especially
 16 when used with stamps. It seems quite random as to
 17 whether the quantity selected follows the user into the
 18 next screen when selling loose stamps. Sometimes it
 19 does, sometimes not. On occasions the quantity clears
 20 back to 1 but then when you select the stamp
 21 denomination suddenly remembers the quantity. The
 22 feedback from St Peters Street branch is that this is
 23 the single most common cause of losses in their branch.
 24 "Can you have one of your team investigate, please?"
 25 Further up the page, please, you forward this on to

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1 Dave Hulbert on 5 January 2012, asking one of the team
2 to take a look. Mr Baker was raising a glitch in the
3 quantity function which affecting branch accounts, so
4 causing losses, is how he's put it; did this cause you
5 any concern?

6 **A.** I don't recall this email.

7 **Q.** Looking at it now, do you connect this at all to
8 concerns or questions about Horizon integrity?

9 **A.** So it could potentially be or it could be a hardware
10 fault but it goes back to, if faults are investigated
11 and if they are dealt with, that retains the integrity
12 in the system.

13 **Q.** Could we have on screen, please, POL00096881. This is
14 an email chain from August 2012. It relates to apparent
15 shortfalls at a branch totalling £18,000, over
16 an 18-month period. It was a case which was raised with
17 you by Angela van den Bogerd. Starting, please, on
18 page 5 of this document, this is an email from -- if we
19 can just go back a page, please, to the bottom --
20 Contract Admin Team, 2 August 2012, and it's to Anita
21 Bravata. Someone called Trudy, summarises the position
22 in this way:

23 "Hi Anita -- I rang the PM, Jane, at Semilong [post
24 office] this morning just as an engineer had arrived at
25 her branch. She explained that she has had an ongoing

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1 Can you go back to page 3 of this document. The
2 email at the top of the page here from Angela van den
3 Bogerd is dated 3 August 2012, and this to Craig Tuthill
4 and Lin Norbury, and she says:

5 "Lin,

6 "I have not (to my knowledge) been made aware of
7 this branch previously and their ongoing claims that
8 discrepancies incurred were as a result of the Horizon
9 system. The content of the email chain below has the
10 potential to said hares running before we properly
11 understand what has gone on here and what the potential
12 consequences are. Therefore can I have as a matter of
13 urgency the background on this branch, including the
14 balancing records since the agent was appointed; TCs;
15 NBSC and Horizon helpline logs and all associated
16 correspondence. I will flag this to the JFSA Working
17 Group and in particular raise with Lesley Sewell in
18 relation to the Horizon system."

19 Then we can see, at the top of page 2, please,
20 Angela van den Bogerd forwarding this to you, saying
21 she's left a voicemail also, asking to discuss. Then
22 page 1, please, your email starting in the middle of the
23 page, that's also dated 3 August 2012, sent to Stephen
24 Long, copied to Angela van den Bogerd, and it says this:

25 "Stephen

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1 problem with discrepancies at her branch for the last
2 18 months and you were aware of the situation. She said
3 yesterday on Position 3 there was less than £1,000
4 working cash. The clerk did a balance snapshot and it
5 was £170 over -- she immediately did a printout and it
6 was then showing as £700 under. So she knows there is
7 a fault on the Horizon system. I agreed I would ring
8 her back at 1.00 pm to see what the engineer had found
9 out.

10 "I have just rang Jane back and she was so happy she
11 said she could cry with relief. The engineer said there
12 is a definite fault on the line -- there was a bad noise
13 on the line and this was probably causing a 'loop' -- he
14 said it may be caused by her PayStation. He has changed
15 the faceplate and the ADCL cable and is hoping this
16 solves the problem. Horizon team will now keep an eye
17 on it and may ring her to tell her to disconnect her
18 PayStation and then send her a new one.

19 "She has always known that the TCs were not hers but
20 has always settled centrally -- a total of approximately
21 £18,000 over the last 18 months -- she has even had to
22 cash in her pension to pay these off and now is asking
23 for this money back.

24 "Can you advise how we go about seeing how much
25 money this lady is due back please."

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1 "Can you help with this issue -- it is obviously
2 quite sensitive.

3 "The branch has had issues over a period of months
4 and the engineer has just found a fault on the line. We
5 would like a view on whether or not this type of fault
6 would cause an issue of this nature -- as you will see
7 from the email that this is to the tune of £18,000.

8 "Angela is leading the investigation from Post
9 Office ...

10 "I realise this is probably outside of the usual
11 process but there is a nervousness around this one and
12 the fact that the branch now believe the cause has been
13 found."

14 This is forwarded on, scrolling up, please, to
15 Gareth Jenkins by Stephen Long for a view. We can see
16 there he's being asked to take a look, the matter is
17 sensitive. He says:

18 "I have a very clear view on Lesley's question
19 regarding the possibility of a network fault causing
20 such discrepancies over such a long period; however, you
21 have far more knowledge and experience than me. What do
22 you think?"

23 Were you concerned about the situation which was
24 being brought to your attention, that is £18,000 of
25 apparent shortfalls being reported over 18 months?

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1 A. Yes, and that's why I raised it with the Account
2 Executive.

3 Q. The subpostmaster in this case was convinced that the
4 apparent shortfalls were caused by the system but she
5 had cashed in her pension to settle centrally up to this
6 point. Did this give you any cause for concern in
7 relation to the fact that this subpostmaster had felt it
8 necessary to settle centrally for apparent shortfalls
9 which she was convinced were the fault of the system,
10 not her?

11 A. So yes, I would have been concerned about it.

12 Q. Did you raise that aspect with anyone?

13 A. I can't recall exactly what I did or didn't because
14 I have looked at this and other documents within the
15 pack, because I couldn't understand why I'd copied Andy
16 Garner and, unfortunately, I went off to have
17 an operation straight after this, two days later so ...

18 Q. Do you need to take a break?

19 A. No, I'm okay. I clearly feel so bad for the
20 subpostmaster.

21 SIR WYN WILLIAMS: Could you tell me who Stephen Long is?

22 A. So Stephen Long was the Account Executive at Fujitsu --

23 SIR WYN WILLIAMS: Right, I see. It's not a name I've come
24 across, so he's Fujitsu?

25 A. Yes. So I took this very serious -- I can see I took
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1 it."

2 Then follow some further emails before a timeline is
3 sent by Rodric Williams to you and Rod Ismay, so page 1,
4 please, about halfway down the page. This is copied to
5 Andrew Winn, Hugh Flemington and Simon Baker. We can
6 see from the timeline here, can't we, that the issue
7 first came to the attention of the Post Office, the
8 first bullet point here, specifically Post Office
9 Finance Service Centre, on 6 February 2012, at the close
10 of a branch trading period; would you agree?

11 A. Yes.

12 Q. The events which followed were these, so:
13 "The issue raised concerned the £9,799.88
14 discrepancy at the Willen branch.
15 "FSC might have proactively contacted [the
16 subpostmaster] given the size of the discrepancy.
17 "FSC investigated, saw that it looked wrong, and
18 brought the account back to balance (i3 £0) at no cost
19 to the [subpostmaster].
20 "FSC would have monitored the Willen branch to see
21 what happened the following month.
22 "Over the next few weeks, as the rest of the branch
23 trading data for the same period was processed, the
24 other 13 branch anomalies were noted.
25 "Those other branches' accounts were brought to
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1 this seriously when I read the email in the pack and
2 I escalated it to my senior counterpart at Fujitsu to
3 examine what had gone on here.

4 SIR WYN WILLIAMS: Well, that was my next question. He had
5 the same kind of seniority at Fujitsu as you had at Post
6 Office, yes?

7 A. Yes, he did and my regret with this is I don't know what
8 happened out of it.

9 SIR WYN WILLIAMS: Yes, I follow that you have explained
10 that. But thank you for telling me who Mr Long was.

11 A. Thank you.

12 MS PRICE: Can we have on screen, please, POL00029641.
13 Starting, please, with page 4 of this document, towards
14 the bottom of the page, there is an email from Gareth
15 Jenkins to you dated 28 June 2013, and Mr Jenkins says:
16 "Lesley,
17 "The local suspense problem was first raised as
18 a call on the Horizon Helpdesk by NBSC at 4.51 pm on
19 Monday, 25 February 2013 ...
20 "Problem diagnosed by Thursday, 28 February and
21 a conference call held with [Post Office Limited] to
22 brief them as to the issue and its scope."
23 In your email reply above, dated 3 July 2013, you
24 ask for details of this call:
25 "... I'm interested in the detail and who raised
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1 balance, again at no cost to the subpostmaster.
2 "This was not perceived to be a significant issue
3 given the small number of branches affected and the
4 small sums involved."
5 Then:
6 "On 6 February 2013 [so a year later] the Willen
7 [subpostmaster] contacted [Post Office Limited] National
8 Business Support Centre to report the same discrepancy
9 in his branch trading as the previous year."
10 Over to the top of the next page:
11 "NBSC passed this on to Fujitsu between 6 and
12 8 February 2013.
13 "Fujitsu then notified FSC of the problem on
14 28 February 2013.
15 "Fujitsu resolved B14 on 25 April 2013."
16 So a full year later, we have this issue being
17 reported by the same subpostmaster to the NBSC. The
18 Post Office knew about the suspense account bug for
19 a full year before Fujitsu was informed about it; is
20 that right?
21 A. So they were -- Post Office were aware -- from what
22 I understand, the FSC were aware of a discrepancy at
23 that particular branch. It wasn't identified as a fault
24 until a year later. So they weren't aware that it was
25 a fault.
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1 Q. So they were aware of the impact --
 2 A. Impact but not that it was a fault, until a year later.
 3 It wasn't found until a year later.
 4 Q. It appears that someone did not regard the issue as
 5 significant, given the small number of branches
 6 affected. Do you know who it was who made that
 7 assessment?
 8 A. I don't know who would have made that assessment.
 9 Q. Okay. Is this a reflection of the P2 grading system at
 10 the time that something was only graded a P2 -- that is
 11 a significant incident -- if a significant number of
 12 branches were affected, or would that not have been
 13 being considered by FSC?
 14 A. No, because -- the FSC would not determine whether it
 15 was a P1 or a P2. That would come into IT for them to
 16 understand what the issue was and what the impact was.
 17 As I understand it, FSC had obviously dealt with this --
 18 dealt with Willen branch in -- forgive me, 2012, yeah?
 19 And there was no issue found, so the discrepancy was
 20 written off, as I understand it.
 21 Once Willen branch came back a year later and there
 22 was more detailed investigation, it was at that point
 23 that we understood that there was a fault. I don't know
 24 when IT was involved, at which point. I don't know
 25 whether they were involved when the one branch raised

1 The third bug which was referenced in the Second
 2 Sight Interim Report was the Falkirk bug. Do you recall
 3 becoming aware of that in the summer of 2023 (sic)?
 4 A. Only through the Second Sight Report.
 5 Q. The draft briefing note, which was prepared for Paula
 6 Vennells on the Second Sight review into Horizon, which
 7 was dated 2 July 2013, is a document you refer to at
 8 paragraph 18 of your statement, and that deals with this
 9 bug, the Falkirk bug. Could we have that on screen,
 10 please. The reference is POL00029627.
 11 Page 5 of this document, please. Towards the bottom
 12 of the page there is a heading "Other anomalies --
 13 'Falkirk'". We'll come back to the terminology of
 14 anomalies in due course but, for now, focusing on the
 15 information being provided in this draft briefing, it's
 16 explained:
 17 "We are also aware of a further anomaly in Horizon
 18 which was been considered in both criminal and civil
 19 Court proceedings the -- the 'Falkirk Anomaly'.
 20 "The Falkirk Anomaly occurred when cash or stock was
 21 transferred between stock units. It was resolved in
 22 March 2006 and is therefore a different anomaly to
 23 either the 14 Branch or 62 Branch Anomaly."
 24 So those other two were the receipts and payments
 25 mismatch bug and the suspense account bug, weren't they?

1 the issue but we were certainly involved, obviously,
 2 when there was more branches.
 3 Q. At the time, was there any guidance in place for the FSC
 4 as to when they should refer something either to IT
 5 within the Post Office or to Fujitsu?
 6 A. I don't know the answer to that one, I'm sorry.
 7 Q. Had you been made aware of the suspense account bug
 8 before June 2013?
 9 A. I was made aware of it once we understood it was
 10 a fault, so that would have been in 2013.
 11 Q. What was your reaction when you saw this timeline in
 12 July 2013?
 13 A. It wasn't good. However, I think if you've got -- if
 14 there's one discrepancy in a big system, that's hard to
 15 find if there was a fault. And it was obviously
 16 investigated at the time and they couldn't find a fault.
 17 I think the main concern for me would have been to
 18 ensure that the branch was not disadvantaged, which they
 19 weren't.
 20 Q. Given that this had gone unidentified as a bug for
 21 a year, did you have any concern that there might have
 22 been branches affected that hadn't been identified?
 23 A. The resolution, as I understood it, identified all
 24 branches that were affected.
 25 Q. That document can come down now. Thank you.

1 A. Yes.
 2 Q. "The Falkirk Anomaly was the subject of expert evidence
 3 in the 'Misra' criminal prosecution, where:
 4 "a. the defence expert asserted that its existence
 5 demonstrated Horizon had faults which could cause
 6 losses, and therefore that possibility could not be
 7 excluded in Misra's case."
 8 "b. the prosecution expert (Gareth Jenkins from
 9 Fujitsu) asserted that it could not have been
 10 responsible for the losses because its clearly visible
 11 events had not manifested themselves in the branch
 12 records, and that it had been fixed more than a year
 13 earlier."
 14 Then it goes on to explain the outcome of the Misra
 15 case. It also, at 32, refers to the Falkirk anomaly
 16 having been:
 17 "... considered by the High Court in December
 18 2006/January 2007, when a subpostmaster (Lee Castleton)
 19 raised it as part of his defence to a debt recovery
 20 action for £23,000.
 21 "The court found 'no evidence' of the Falkirk
 22 Anomaly in [the] branch ..."
 23 So, on the basis of the information contained in
 24 this document, individuals within the Post Office knew
 25 about the Falkirk bug by at least late 2006/early 2007;

1 was that your understanding?
 2 **A.** I can only assume that's correct.
 3 **Q.** Well, were you involved in creating this draft briefing?
 4 It was certainly sent to you?
 5 **A.** Yes, part of it. So yes, yeah.
 6 **Q.** Can you help at all with the work that you did relating
 7 to the Second Sight Review, so at this point in summer
 8 2013, with how high up knowledge of the Falkirk bug in
 9 2006/2007 went within the Post Office?
 10 **A.** I don't know.
 11 **Q.** Can we have on screen, please, POL00105632. There is
 12 an email from Alwen Lyons to Paula Vennells, copied to
 13 Martin Edwards, Mark Davies and Susan Crichton. It is
 14 dated 23 May 2013 and the subject is "James brief".
 15 Just for context there, the James brief, was that
 16 referring to Lord Arbuthnot, who was then --
 17 **A.** I assume it does, yes.
 18 **Q.** It reads as follows:
 19 "Paula the only things that is not in the brief for
 20 James is our move away from 'there are no bugs in
 21 Horizon' to 'there are known bugs in every computer
 22 system this size but they are found and put right and no
 23 subpostmaster is disadvantaged by them' it would be good
 24 to be able to go on and say 'or has been wrongfully
 25 suspended or prosecuted'.

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1 unexplained shortfalls had been raised with you and
 2 others within the Post Office between September 2011 and
 3 August 2012?
 4 **A.** Yes.
 5 **Q.** How can it be, therefore, that the public position of
 6 the Post Office, up until May 2013, was "There are no
 7 bugs in Horizon"?
 8 **A.** I don't know the answer to that because, from my
 9 perspective, as an IT professional, I wouldn't say there
 10 were no bugs in any system, because you do -- and I call
 11 them "faults", not "bugs" -- there are faults in
 12 computer systems and it's important how you deal with
 13 them. So when I read this email, I couldn't understand
 14 it.
 15 **Q.** Were you aware that that was the position being put
 16 forward outside of the Post Office up until this point?
 17 **A.** I don't recall what the position was at that time.
 18 **Q.** Could we have on screen, please, POL00107955. This is
 19 page 2 of this document, please. About halfway down the
 20 page is the first email in this chain from Mark Davies
 21 to Alwen Lyons, Simon Baker, Susan Crichton, Martin
 22 Edwards and you, among others. It is dated 2 July 2013
 23 and the subject is "Daily comms call". Mr Davies asks
 24 Nina to set up a daily comms call on the Horizon issue
 25 with all those copied and include Portland on it:

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1 "I do not think that is a phone call conversation
 2 but needs to be aired at some time with James, I would
 3 suggest at your meeting."
 4 I should stress you're not on the copy list to this
 5 email, so you didn't receive it at the time, but drawing
 6 together the evidence from this morning on Post Office
 7 knowledge of bugs, errors, defects or issues with the
 8 Horizon system, which could affect or might have
 9 affected balancing in branch, it seems that, first,
 10 individuals within the Post Office knew of the Falkirk
 11 bug by at least late 2006/early 2007; would you agree
 12 with that?
 13 **A.** Yes.
 14 **Q.** Second, there was Post Office knowledge of at least one
 15 receipts and payments mismatch bug by late 2010?
 16 **A.** Yes.
 17 **Q.** You yourself, as Post Office Head of IT, knew about the
 18 receipts and payments mismatch bug by at least March
 19 2011?
 20 **A.** Yes.
 21 **Q.** Individuals within the Post Office knew about the
 22 effects of the suspense account bug by February 2012,
 23 even if the cause was not known at that stage?
 24 Finally, issues relating to glitches in the quantity
 25 function affecting branch accounts and large,

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1 "If others need to be involved please can colleagues
 2 suggest names."
 3 Then the email above this, towards the bottom of
 4 page 1, from Nina Arnott to those on the last
 5 circulation list, along with a few others, including
 6 Rodric Williams, this is also dated 2 July 2013, and she
 7 says:
 8 "No problem Mark.
 9 "I appreciate it's tricky with everyone's busy
 10 diaries. But in order to manage this reputational issue
 11 most effectively, our top priority will be to ensure
 12 everyone can attend one conference call a day for the
 13 next four working days, to ensure there is one forum for
 14 important decision making about our communications
 15 approach, as publication date draws near."
 16 The publication being referred to here, is that the
 17 publication of the Second Sight Interim Report?
 18 **A.** I believe it is.
 19 **Q.** You then reply above, suggesting that Ms Arnott fixes
 20 this for the best time and you manage around it --
 21 **A.** Mm-hm.
 22 **Q.** -- and we can see a reply to you there from Nina.
 23 What was your role in relation to the formulation of
 24 the Post Office's public communications strategy about
 25 Horizon's integrity?

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1 **A.** So, I can't remember what involvement I had or didn't
 2 have at this stage, and I've looked at this email and
 3 I can't remember the meetings at the time. My input
 4 would have been in terms of commenting on drafts or
 5 documents. That's the best I can -- I can't -- I don't
 6 even recall that, to be fair. That's what I would have
 7 done.

8 **Q.** Could we have on screen, please, POL00341348. Starting,
 9 please, towards the bottom of page 1. It is an email
 10 from Simon Baker to you and Alwen Lyons, copied to Simon
 11 Baker himself. It is dated 28 June 2013 and the subject
 12 is "Summary of Receipts Payments problems". In his
 13 email he sets out a timeline of events and then, at the
 14 top of page 2, please, under "Problem Description",
 15 there is this:

16 "The problem occurs as part of the process of moving
 17 discrepancies into local suspense.

18 "There was a bug introduced as part of HNG, that in
 19 certain circumstances meant that discrepancies were not
 20 properly cleared to local suspense."

21 Going up, then, to the top of the first page of this
 22 document, please, you reply on 29 June 2013 saying this,
 23 two lines down:

24 "Can we change the reference from Bug to fault."
 25 Before I ask you about that, I'd like to look at

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1 "My engineer/computer literate husband sent the
 2 following reply to the question:

3 "What is a non-emotive word for computer bugs,
 4 glitches, defects that happen as a matter of course?"

5 "Answer:
 6 "Exception or anomaly. You can also say
 7 conditional exception/anomaly which only manifests
 8 itself under unforeseen circumstances'."

9 Mr Davies responds above stating:
 10 "I like exception [very] much."
 11 "Very helpful."

12 What did you understand the concern to be about
 13 using the term "bug"?

14 **A.** I really didn't understand the concern about using the
 15 word "bug" or "fault" because that's what they were.

16 **Q.** Did you understand this to be driven by a desire to
 17 minimise the seriousness of identified bugs by using
 18 different language?

19 **A.** It appears that way.

20 **Q.** At the time, was that something that occurred to you or
 21 not?

22 **A.** At the time, I thought it was -- I just thought it was
 23 mad.

24 **Q.** Why do you say that?

25 **A.** Because they were faults, they weren't -- I wouldn't

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1 just one more document from the day before, and that's
 2 on 28 June 2013. Could we have on screen, please,
 3 POL00296821. This is an email from Alwen Lyons to Mark
 4 Davies, Hugh Flemington and you, copied to Rodric
 5 Williams and Jarnail Singh, dated 28 June 2022, Subject
 6 "14 Bug -- Wall". Alwen Lyons says:

7 "Can we call bugs incidents from now on please.
 8 "Thanks
 9 "Alwen."

10 This appears to be a response from an email from
 11 Mark Davies below, on the same day, which says:

12 "Can we change the way we are referring to this
 13 please as a matter of urgency?"

14 Was this correspondence on 28 June why you suggested
 15 changing the reference from "bug" to "fault" in your
 16 email on 29 June?

17 **A.** I don't know. All I can see is that my whole career
 18 I've talked about "faults" and "issues". I've never
 19 used the word "bugs".

20 **Q.** Could we have on screen, please, POL00380985. This is
 21 an email from Mark Davies to Paula Vennells, dated
 22 2 July 2013, and it's copied to you, among others, and
 23 the subject is "Computer '?'s". Mr Davies is responding
 24 to an email from Ms Vennells of the same date, just
 25 below, which says:

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1 have classed them as anomalies and, yes, it changed the
 2 way in which we had to respond and communicate about
 3 them, but they were faults.

4 **Q.** Could we have on screen, please, POL00145100. This is
 5 an email from you to Martin Edwards, subject line "JA
 6 meeting brief". Again, is that now Lord Arbuthnot?

7 **A.** Yes.

8 **Q.** There's a reference to a meeting brief for Paula
 9 Vennells ahead of that meeting, and you say this:

10 "Martin
 11 "Just to be clear on the anomalies -- these were not
 12 undiscovered issues, we brought them to [Second Sight's]
 13 attention for completeness. Also, when Susan and I were
 14 crafting the briefing we were careful in our wording as
 15 these were associated with potential losses to
 16 [subpostmasters] in their trading statements. This was
 17 so that we could differentiate from other issues --
 18 a good example is the PIN pads issue we had 3 years ago
 19 which did get some publicity in the press. In addition,
 20 Rod is reviewing another issue he raised with us on
 21 Friday -- although he believes it did not affect
 22 [subpostmasters] -- I've asked him to double check.
 23 "We need to be careful in our comms not to indicate
 24 that we do not have anomalies or exceptions as that is
 25 not the case -- it's the context which is important and

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1 in this case the fact that they could and did affect
 2 trading statements."
 3 So just to understand the issues and separate them
 4 out in this, it appears that, by this point, you've
 5 adopted the terminology of "anomalies" or "exception".
 6 Was that because of the correspondence we've just been
 7 to?
 8 **A.** That's because we were asked to do that.
 9 **Q.** Of course.
 10 **A.** But, within IT, I would have talked about -- still
 11 talked about "faults".
 12 **Q.** So separately from the question of terminology, you
 13 appear here to be drawing the distinction between
 14 relevant bugs or faults, or whatever you want to term
 15 them, and ones you considered not to be relevant --
 16 **A.** Yes.
 17 **Q.** -- is that right?
 18 **A.** Yes, that's right.
 19 **Q.** Can you explain which ones you thought were relevant?
 20 **A.** Which ones were relevant?
 21 **Q.** So you've explained here -- you've made a reference to
 22 the ones that could and did affect trading statements.
 23 So was that the point you were trying to make?
 24 **A.** That's -- yes, I was trying to make it really clear that
 25 they did affect subpostmasters' trading statements and

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1 **MS PRICE:** Of course, sir.
 2 Could we have on screen, please, POL00189880.
 3 I appreciate, Ms Sewell, this is a document that has
 4 been provided to you very recently, only this morning.
 5 Have you had a chance to read through this and the other
 6 two linked documents?
 7 **A.** Very briefly.
 8 **Q.** We'll take it fairly slowly, then. This is an email
 9 dated 2 July 2013 from Mark Davies, Communications
 10 Director, to you and others, and it encloses a draft
 11 statement and it's called "Draft Press", so it appears
 12 that it was a draft press statement; is that right?
 13 **A.** Yes.
 14 **Q.** Going to the attachment, POL00189881, we can see there:
 15 "Confidential
 16 "DRAFT Post Office statement on Horizon system."
 17 This contains reference to the receipts and payments
 18 mismatch bug and the suspense account bug, three
 19 paragraphs up, please, from the bottom of the page. We
 20 see there the reference in that paragraph, three
 21 paragraphs up, to the 62 and the 14 branches affected.
 22 The next paragraph underneath that says this:
 23 "In the first of these cases, 17 subpostmasters were
 24 adversely affected -- and later reimbursed -- to a total
 25 cost of £xxx (with the highest payment being £115). In

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1 this was with regard to the receipts and payments and
 2 the suspense fault, effectively.
 3 **Q.** Could we have on screen, please, POL --
 4 **SIR WYN WILLIAMS:** Before we do, sorry -- I may be chasing
 5 a hare here, which is unnecessary but bear with me --
 6 there's been what I think at the moment some conflict in
 7 the evidence about exactly who it was drew the attention
 8 of Second Sight to these other -- to adopt your word,
 9 Ms Sewell -- faults. You write in this email "We
 10 brought them to SS attention for completeness".
 11 When you used the word "we", can you remember who
 12 you were referring to then?
 13 **A.** I think IT did.
 14 **SIR WYN WILLIAMS:** So you think someone in the IT Department
 15 of the Post Office --
 16 **A.** Yes.
 17 **SIR WYN WILLIAMS:** -- was the person or persons who actually
 18 alerted Second Sight to these bugs or faults?
 19 **A.** Yes, I do.
 20 **SIR WYN WILLIAMS:** Fine, all right.
 21 **A.** And, sorry --
 22 **SIR WYN WILLIAMS:** All right, that's fine.
 23 Sorry about that but, as you know, Ms Price, there's
 24 been -- not a degree of debate but uncertainty about who
 25 said what to whom on this.

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1 the second set of cases, the total impact was xxx.
 2 "The accounting anomalies in these cases were picked
 3 up by the Horizon system, Post Office proactively
 4 informed subpostmasters and any losses -- however
 5 minor -- were reversed."
 6 That reference to the accounting anomalies being
 7 picked up by the Horizon system, that's not correct, is
 8 it, that both anomalies were picked up by the Horizon
 9 system? Because the suspense account bug was not
 10 recognised as a bug and reported to Fujitsu by the Post
 11 Office for a year after its effects were first reported;
 12 would you agree with that?
 13 **A.** Yes, I would.
 14 **Q.** You provided comments on this draft statement. Could we
 15 have on screen, please, POL00296993. We can see here
 16 an email from Ruth Barker, on the same day, 2 July 2013:
 17 "Here's the amended statement which I think
 18 incorporates all comments and amends received so far."
 19 It's to you and others.
 20 Scrolling down to the email below, please, a little
 21 further down, please, in the middle of the page there we
 22 have an email from you, dated 2 July, to Nina Arnott,
 23 Ruth Barker and others about the draft statement, and
 24 you say:
 25 "Nina

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1 "Simon and I have gone through the detail with
 2 Ruth -- she has our comments."
 3 Then scrolling back up to the version of the draft,
 4 which incorporates your comments, the fifth paragraph in
 5 the amended draft, starting "The Horizon system", the
 6 last sentence in that says "This evidence included", and
 7 there's a reference there to the provision of
 8 information to Second Sight. After that:
 9 "The evidence included details two sets of
 10 transaction anomalies -- one impacting 62 of the Post
 11 Office's 11,800 branches between March and October 2010
 12 and the other affecting 14 branches with respect to
 13 accounting entries in 2010/11.
 14 "In the first of these cases, 17 subpostmasters were
 15 adversely affected -- and later reimbursed -- to a total
 16 cost of £xxx pounds ... In the second set of cases the
 17 total impact was xxx. When the accounting anomalies in
 18 these cases were picked up by the Horizon system, the
 19 Post Office proactively informed subpostmasters and any
 20 losses, however minor, were reversed."
 21 So the change here seems to be to "when the
 22 accounting anomalies were picked up" in place of "the
 23 anomalies were picked up by the Horizon system"; was
 24 that a change you made to the wording?
 25 **A.** So having just seen this, this morning, I didn't --

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1 **SIR WYN WILLIAMS:** We're about due our second break.
 2 **MS PRICE:** We are, sir. I was just going to suggest that we
 3 might want to take our break there.
 4 **SIR WYN WILLIAMS:** Yes, we'll take ten minutes now so we'll
 5 return at 12.25.
 6 **MS PRICE:** Thank you, sir.
 7 (12.16 pm)
 8 (A short break)
 9 (12.26 pm)
 10 **MS PRICE:** Hello, sir.
 11 **SIR WYN WILLIAMS:** Hi.
 12 **MS PRICE:** Ms Sewell, just before we go back to the
 13 documents, in answer to a question from the Chair
 14 earlier, you said you thought that someone from IT told
 15 Second Sight about the bugs. Can you help at all with
 16 who from IT that was?
 17 **A.** I think -- I think it was Simon Baker.
 18 **Q.** Could we have back on screen, please, the document we
 19 were just looking at, POL00296993. Just looking at the
 20 draft, scrolling down a bit, please, the first paragraph
 21 on the page:
 22 "An interim review into concerns around the accuracy
 23 of the accounting programme used in Post Office branches
 24 has concluded there are no systemic issues inherent
 25 within the computer system."

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1 I couldn't recall seeing this at the time. I obviously
 2 did see it but I can't remember this.
 3 **Q.** Do you see the problem that that still seems to be
 4 incorrect --
 5 **A.** Yes.
 6 **Q.** -- based on what we know about the suspense account bug?
 7 **A.** Yes.
 8 **Q.** Is that something that you should have corrected at the
 9 time?
 10 **A.** I can't remember reading it and I can't remember the
 11 document, so I'm struggling with this, and I would have
 12 relied heavily on Simon, as well, to help me as part of
 13 this, because he was pulling together all the detail
 14 on -- a lot of the detail on these particular faults.
 15 **Q.** It's an important point, isn't it, because, if a bug can
 16 go unrecognised for a year, a bug which causes
 17 accounting discrepancies, the Post Office, which
 18 dismisses, prosecutes and seeks to recover debt from
 19 individuals on the basis of Horizon accounting data,
 20 might go on to take action against individuals wrongly
 21 before the bug is discovered as such, mightn't it?
 22 **A.** It is an important point but I would never intentionally
 23 leave anything out. I just wouldn't, sorry.
 24 **Q.** Okay, do you want to take a break?
 25 **A.** No, I'm fine.

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1 The point about Second Sight confirming that there
 2 were no systemic issues in the computer system is
 3 a point that you raise at paragraph 49 of your
 4 statement, and I'd just like to explore that, please.
 5 That document can come down. Thank you.
 6 I'd just like to explore that, please, from an IT
 7 perspective. In the context of bugs or defects
 8 affecting a computer system, isn't any bug or defect
 9 inherently systemic, in that all branches are on the
 10 same software, even if all branches are not affected by
 11 a bug?
 12 **A.** So how I would look at it from an IT perspective,
 13 systemic would affect everybody. So it would be quite
 14 widespread. You do have, in all systems -- and I've
 15 seen it throughout my career, where you can have
 16 a fault, which will affect just small number of --
 17 I mean, in this case it's branches or accounts. You
 18 know, if I think about my banking background. So
 19 systemic to me is widespread.
 20 **Q.** Referring to the lack of a systemic issue, using your
 21 definition of systemic there, it doesn't engage, does
 22 it, with the underlying point here that there were bugs
 23 which could cause accounting discrepancies. One of the
 24 bugs referred to in the Second Sight Report went
 25 unrecognised, as such, for a year. There might well be

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1 other bugs in a system of this size and scale which
 2 occur; would you agree with those propositions so far?
 3 **A.** Yes.
 4 **Q.** In those circumstances, how could Post Office say that
 5 its reliance on transaction data produced by Horizon to
 6 dismiss, to prosecute, to seek to recover debt from
 7 people had not caused the apparent losses, which were
 8 the subject of challenge? We've seen in a number of
 9 places quite bold statements that the Horizon system had
 10 not caused the apparent losses which were the subject of
 11 Horizon challenges.
 12 **A.** Yes.
 13 **Q.** How was Post Office in a position to say that?
 14 **A.** So -- and I'll go back just from an IT perspective, for
 15 any fault or issue that is raised, through whatever
 16 means it's raised, the important point to maintain the
 17 integrity of the data is to be able to identify and
 18 rectify it. Now, that doesn't deal with potential
 19 issues that you can't see because you're looking for
 20 something that you can't actually see. But it's
 21 important and, in these cases, these particular faults,
 22 even though one took a year to deal with, it was
 23 identified and it was corrected and the original issue
 24 with the suspense one for the subpostmaster -- Willen,
 25 I think it was -- the appropriate process control kicked
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1 on screen, please, FUJ00156869. This is an email from
 2 Harvey Michael, commercial director and solicitor at
 3 Fujitsu, to someone called Helen Lamb, and it's dated
 4 18 September 2013. The subject here is "Summary of
 5 meeting with Post Office", and there is a list of
 6 attendees and your name is on the list as attending.
 7 **A.** Mm-hm.
 8 **Q.** Having a look down the table that summarises that
 9 meeting, do you recall being at that meeting?
 10 **A.** I'm sorry, I don't.
 11 **Q.** Going to point 7 from the summary, please, page 2, we
 12 have this:
 13 "[Post Office Limited's] criminal barrister from
 14 Cartwright King solicitors has flagged a discrepancy
 15 between the evidence given in court and the information
 16 provided as part of the Second Sight audit. This could
 17 mean that the relevant Expert is 'tainted'.
 18 Then in the next column we have:
 19 "I disagree that the expert is 'tainted' but
 20 ultimately there is little point challenging it as we
 21 agree it may be a sensible time to transition to a new
 22 expert to ensure continuity of service."
 23 Then there's an "Action":
 24 "SC to determine whether she can share the report
 25 with Fujitsu."
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1 in, because it can't just be about the system; it's got
 2 to be about the process, as well.
 3 **Q.** Well, in that case, the Financial Services Centre had
 4 looked at it and spotted that something wasn't right.
 5 But do you recognise that there might be other cases
 6 which were or weren't on the radar of Financial
 7 Services, where there were apparent shortfalls which
 8 weren't on Fujitsu's radar, which weren't on anyone's
 9 radar?
 10 **A.** That could have been a possibility but that then leads
 11 on to how you check for the integrity of the data, and
 12 I don't know whether we'll come on to that a little bit
 13 later but that goes on to, well, how do you -- what are
 14 the checks and balances in place as that data goes from
 15 the terminal to the data centre itself and the database.
 16 **Q.** In the context of prosecutions, you will be aware of
 17 audit data requests that may have been made in support
 18 of some prosecutions.
 19 **A.** Mm-hm.
 20 **Q.** But were you aware that there were other prosecutions
 21 where no audit data was ever requested from Fujitsu?
 22 **A.** Not to my knowledge.
 23 **Q.** I'd like to move, please, to the question of Gareth
 24 Jenkins and the evidence he gave in support of
 25 prosecutions bought by the Post Office. Could we have
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1 You appear to have been told at this meeting that
 2 Post Office's criminal barrister from Cartwright King
 3 had formed the view that the expert -- and that is
 4 Gareth Jenkins -- was tainted because of a discrepancy
 5 between the evidence he'd given in court and the
 6 information provided to Second Sight. Were you aware at
 7 the time that this was Gareth Jenkins?
 8 **A.** Yes, I was.
 9 **Q.** So you were aware of this opinion that had been given by
 10 the barrister from Cartwright King?
 11 **A.** I was aware probably from Sue Crichton. I can't
 12 remember -- I don't recall seeing any legal review that
 13 was done but I was certainly aware from Susan.
 14 **Q.** Did this concern you at the time?
 15 **A.** Yes, it would have concerned me at the time. I can't
 16 remember what the concerns were exactly but it would
 17 have been about -- because, as I understood it, he
 18 hadn't disclosed all of the faults that he was aware of.
 19 I think that was the material issue.
 20 **Q.** Did anyone at this meeting -- and I recognise that
 21 you're struggling to recall the meeting in particular --
 22 but did anyone from Fujitsu express concern about this?
 23 **A.** I can't remember.
 24 **Q.** Could we have on screen, please, FUJ00117284. This is
 25 a "Business Review" of the Post Office Account dated
 88

1 17 April 2015. Going to page 3, please, under "Customer
2 Satisfaction" that bottom left box, on the left-hand
3 side, if we can zoom in a little, please. You see the
4 last bullet point here is:

5 "Gareth Jenkins recognised by Lesley Sewell for
6 impeccable service and individual contribution."

7 So is this the same Gareth Jenkins who had been
8 described as a "tainted" expert in that meeting we've
9 just looked at?

10 **A.** It will be.

11 **Q.** Had it not negatively impacted upon your assessment of
12 him?

13 **A.** So any -- just by way of background, with calling out
14 individuals for any particular positive contribution to
15 Post Office, it's highly likely -- and I can assume that
16 the Inquiry will be able to find something that was
17 given to me -- to call Gareth out for a particular
18 reason.

19 **Q.** Can you recall what that was now?

20 **A.** No, I really don't and I can't actually recall. I think
21 this was about 2015, was it? What month was it, again?
22 Sorry.

23 **Q.** April, I think.

24 **A.** Right, okay.

25 **Q.** Yes.

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1 the branch system and could generate questions around
2 how the discrepancy was caused. This solution could
3 have moral implications of Post Office changing branch
4 data without informing the branch."

5 Did Mr Trundell, or anyone else at this meeting or
6 involved in discussions about this at the time, report
7 back to you that this was being contemplated?

8 **A.** I don't believe so.

9 **Q.** This makes clear, doesn't it, that Fujitsu could insert
10 data into the branch account without the branch's
11 knowledge or approval?

12 **A.** Yes, it does.

13 **Q.** Was that fact drawn to your attention at the time?

14 **A.** I don't believe it was.

15 **Q.** Should it have been?

16 **A.** Because I wasn't dealing with the issue itself, um -- so
17 there's two parts to this. I wasn't dealing with the
18 issue. I think, given what we know now and at the time,
19 it should have bubbled up and it should have gone all
20 the way up to Mike Young.

21 **Q.** But as Head of IT, as you were at the time, is this not
22 a material piece of information of which you should have
23 been aware?

24 **A.** This was an operational incident that was being dealt
25 with through a different line and, at the time I joined,

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1 **A.** I really don't know.

2 **Q.** Moving, please, to what has been termed "Remote access",
3 we looked earlier this morning at a meeting note of
4 a meeting in 2010, at which the receipts and payments
5 mismatch bug and potential solutions for dealing with it
6 were discussed. Could we have that back on screen,
7 please. It's FUJ00081945. This is the meeting at which
8 Mr Trundell from your team, or from IT, was in
9 attendance.

10 **A.** Mm-hm.

11 **Q.** Going to page 3, please. Under "Solution One" -- we see
12 that:

13 "There are three potential solutions to apply to the
14 impacted branches, the group's recommendation is that
15 solution two should be progressed."

16 One of the solutions being considered was "Solution
17 One":

18 "... Alter the Horizon branch figure at the counter
19 to show the discrepancy. Fujitsu would have to manually
20 write an entry value to the local branch account.

21 "Impact -- When the branch comes to complete next
22 trading period they would have a discrepancy, which they
23 would have to bring to account.

24 "Risk -- This has significant data integrity
25 concerns and could lead to questions of 'tampering' with

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1 my role was largely changed. It wasn't dealing with
2 these issues. And Ian Trundell -- it's likely Ian would
3 be there just to support, with the reporting line going
4 separately through Andy into Mike.

5 **Q.** Setting aside the proposed solution, which we know
6 wasn't, in fact, the solution which was recommended or
7 adopted, the fact of the ability of Fujitsu to take the
8 step that was being proposed, wasn't that something you
9 should have been told about as Head of IT?

10 **A.** Probably, yes.

11 **Q.** Could we have on screen, please, POL00141531. Going to
12 page 2 of this document, please. Towards the bottom of
13 the page is an email from Simon Baker to Steve Beddoe,
14 copied to you. It is dated 22 May 2013, the subject is
15 "Branch database -- support team changes", and it reads
16 as follows:

17 "Steve

18 "Fujitsu tell me that very very occasionally the
19 support team are required to make updates directly to
20 the branch database (presumably to fix support
21 problems).

22 "And that when such a change is required, it is
23 signed off by [Post Office Limited] using the Service
24 Desk.

25 "Are you aware of this process? And if so, how do

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1 I get a log of all such requests.
 2 "Thanks, Simon."
 3 The email above is to Antonio Jamasb from Simon
 4 Baker, 24 May 2013. Antonio Jamasb was the person who
 5 sent the meeting invite to the 2010 receipts and
 6 payments mismatch bug meeting, wasn't he, and he
 7 attended that meeting?
 8 **A.** Yes.
 9 **Q.** You're copied in here, and it says:
 10 "Tony
 11 "I know you are still working on this. As I am out
 12 next week, can you keep Lesley in the loop as you get
 13 a clear picture on the processes we use to approve
 14 changes to live data, and a list of the times this has
 15 happened.
 16 "Also, Lesley is in Dearne and Chesterfield on
 17 Thursday, if you are there she would appreciate a quick
 18 conversation with you on this subject."
 19 So you were being told in this email chain that
 20 Fujitsu occasionally, or very, very occasionally, made
 21 updates directly to the branch database. Could we have
 22 on screen, please, FUJ00087027. This is an email from
 23 4 June 2013. That appears, from the context and the
 24 email below, to be the American format for dates because
 25 we see the email below is 4 June. So, going up, please,
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1 the receipts and payments mismatch issue. Attached to
 2 Mr Winn's email was the note of the 2010 receipts and
 3 payments mismatch meeting, at which the possible
 4 solution of Fujitsu altering the branch data was
 5 discussed.
 6 When this was sent to you, would you have read the
 7 attachments, the attached meeting note?
 8 **A.** I don't know whether I would have read them. So I can't
 9 remember the document that I saw in the pack, it didn't
 10 spring any -- bring back any memories or anything, so
 11 I can't remember it.
 12 **Q.** You mean the 2010 meeting note?
 13 **A.** Yes, the one you showed me earlier, yeah.
 14 **Q.** Quite apart from the note of that meeting, you'd been
 15 made aware, by this point, of the fact that very, very
 16 occasionally Fujitsu would alter branch data, hadn't
 17 you, in that earlier email we looked at?
 18 **A.** So the earlier email we looked at and, again, I can't
 19 recall having a discussion with Tony or seeing the
 20 output from that email. It does reference data being
 21 changed on the databases. But I don't know what that
 22 was and whether it was transactional data or just -- you
 23 know, you can make general support changes on
 24 a database.
 25 So I really don't know and I couldn't find anything
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1 to that top email. You provide comment here on
 2 providing Second Sight with answers to their questions
 3 about remote access at the Bracknell site. Do you
 4 remember that issue?
 5 **A.** I do.
 6 **Q.** The questions being asked are set out further down this
 7 email chain, page 2, please, Ian Henderson's email of
 8 3 June. There are a series of questions that are set
 9 out there and then this, in the penultimate paragraph
 10 underneath those:
 11 "Please note that we're not really interested in
 12 what the procedures manual says about any of this. We
 13 need to look at whether it would be possible for a rogue
 14 employee to do what is alleged and what log files would
 15 be generated to record that activity. Please note that
 16 I have now been provided with a second batch of employee
 17 email and I may find the other emails that are
 18 potentially relevant to this matter."
 19 You were aware at this time, weren't you, of the
 20 importance of this issue to the integrity of the Horizon
 21 audit data?
 22 **A.** Yes, I was.
 23 **Q.** Could we have on screen, please POL00296795. This is
 24 an email from Andrew Winn to you and others, dated
 25 28 June 2013. It provides a summary of the history of
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1 in the documentation that was provided to see what the
 2 output of that was. I struggle to find anything.
 3 **Q.** That document can come down now. Thank you.
 4 **SIR WYN WILLIAMS:** When you say you struggle to find
 5 anything, just so I'm clear, are you talking about your
 6 struggle now, having read what's been sent to you --
 7 **A.** Yeah.
 8 **SIR WYN WILLIAMS:** -- or struggle then, so to speak?
 9 **A.** No, I struggle to see, from the documentation that was
 10 provided by the Inquiry, Sir Wyn, to see what the output
 11 of that was. But the only point I will add is that,
 12 from the Inquiry notes that were sent, because this was
 13 such a material issue, there was a meeting pulled
 14 together with Second Sight to discuss this particular
 15 point and I was obviously in attendance at that meeting,
 16 and so was Fujitsu.
 17 **SIR WYN WILLIAMS:** Hang on a minute. So there was a meeting
 18 in or about the end of June/early July, is that when
 19 we're talking about, 2013?
 20 **A.** Yes, that's correct.
 21 **MS PRICE:** Sir, there is a note of that meeting.
 22 **SIR WYN WILLIAMS:** Yes, fine. I just wanted to be clear
 23 what the witness was saying, that's all. Thank you.
 24 **MS PRICE:** The note of the 2010 meeting on receipts and
 25 payments mismatch, from that note, it appears that
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1 Fujitsu was being upfront about the fact that it could
 2 alter branch data in the way that was being proposed;
 3 would you agree, having read that note now?
 4 **A.** It does but I would counter that with the number of
 5 times that I and others asked about branch data and we
 6 were consistently given the same message: that it was
 7 not possible.
 8 **Q.** Could we have on screen, please, the Second Sight
 9 Interim Report, that's POL00099063. Going to page 12,
 10 please. This is dealing with spot review SR5, relating
 11 to the Bracknell site allegation. Reference is made at
 12 paragraph 1.4 to an assurance given in a letter to Alan
 13 Bates in 2010, signed by Edward Davey MP, that there is:
 14 "... no remote access to the system or to any
 15 individual branch terminals which would allow the
 16 accounting records to be manipulated in any way."
 17 So that's the quote underneath there.
 18 Over the page at 13, please, at 1.10(b), 1.10 said
 19 "This review has shown", and at (b):
 20 "An email sent to a number of [Post Office Limited]
 21 employees in April 2011, including a member of the
 22 Testing team in Bracknell, included the following
 23 comment:
 24 "Although it is rarely done it is possible to
 25 journal from branch cash accounts. There are possible
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1 of the [Post Office Limited] employees working in
 2 Bracknell in 2008 had access to the back office
 3 accounting system."
 4 So Second Sight's understanding was clearly that the
 5 only way that branch cash accounts could be adjusted was
 6 through the back office accounting system of transaction
 7 corrections, which would be notified to subpostmasters
 8 and required their consent; would you agree?
 9 **A.** Yes.
 10 **Q.** The email we looked at from May, relating to the very,
 11 very occasional intervention of Fujitsu, did you
 12 understand that to mean that Fujitsu could alter the
 13 branch accounts? Now, I know you've drawn a distinction
 14 between fixing bugs but I just want to be clear about
 15 this: before Second Sight published in July, were you
 16 aware that Fujitsu employees, not P&BA, had the ability
 17 to alter branch accounts?
 18 **A.** To the best of my recollection, I didn't think that was
 19 the case, that wasn't until the Deloitte report, which
 20 was a year later.
 21 **Q.** Could we have on screen, please, POL00108538. About
 22 halfway down the page is an email from James Davidson
 23 from Fujitsu, and this is dated 17 April 2014. It is
 24 sent to Rodric Williams. The subject is "Strictly
 25 Private & Confidential -- Subject to Privilege".
 99

1 P&BA concerns about how this would be perceived and how
 2 disputes would be resolved."
 3 Then at 1.11:
 4 "'P&BA' refers to 'Product and Branch Accounting',
 5 which is a team within [Post Office Limited] that is
 6 responsible for the back office accounting system."
 7 At 1.12:
 8 "[Post Office Limited] has told Second Sight that
 9 the comment noted above describes a method of altering
 10 cash balances in the back office accounting system, not
 11 Horizon. We note however that any changes to branch
 12 cash account balances in this way would be subsequently
 13 processed in Horizon using the transaction correction
 14 process. This would be notified to [subpostmasters] and
 15 requires their consent in order for the TC to be
 16 processed. The TC process typically runs on
 17 an overnight basis and is necessary to ensure that the
 18 back office accounting system remains synchronised with
 19 the Horizon system."
 20 At 13:
 21 "Second Sight notes that this method of ultimately
 22 adjusting branch cash accounts in Horizon is similar,
 23 but not identical to, what was described by the
 24 [subpostmaster], albeit in an indirect rather than
 25 a direct way. We have subsequently been told that none
 98

1 Mr Davidson is providing responses to a series of
 2 questions which had been posed by Rodric Williams.
 3 Going over the page, please, to question 2, the
 4 question is:
 5 "Can Fujitsu change branch transaction data without
 6 a subpostmaster being aware of the change?"
 7 The answer is:
 8 "Once created, branch transaction data cannot be
 9 changed, only additional data can be inserted. If this
 10 is required, the additional transactions would be
 11 visible on the trading statements but would not require
 12 acknowledgement/approval by a subpostmaster, the
 13 approval is given by Post Office via the change process.
 14 In response to a previous query Fujitsu checked last
 15 year when this was done on Horizon Online and we found
 16 only one occurrence in March 2010 which was early in the
 17 pilot for Horizon Online and was covered by
 18 an appropriate change request from Post Office and
 19 an auditable log. For Old Horizon, a detailed
 20 examination of archived data would have to be undertaken
 21 to look into this across the lifetime of use. This
 22 would be a significant and complex exercise to undertake
 23 and discussed previously with Post Office but discounted
 24 as too costly and impractical."
 25 Were you aware of this information in April 2014, at
 100

1 the time that this email was sent?

2 **A.** It was a -- I think -- so the Deloitte report was

3 April/May and, at that point, it became very clear to me

4 that Fujitsu had actually inserted a transaction into

5 a Branch Trading statement. I wasn't --

6 **Q.** I will come on to the Deloitte report in a moment, which

7 is May 2014. The information here from Fujitsu,

8 directly from Mr Davidson, did anyone raise that with

9 you in April 2014?

10 **A.** I don't recall it being raised with me and, if it had

11 been raised with me, I wouldn't intentionally not share

12 that sort of information because it's quite important.

13 **Q.** This is another document, isn't it, which suggests that

14 Fujitsu was being upfront about what was and wasn't

15 possible, in relation to changing branch transaction

16 data; would you agree?

17 **A.** Yes, it is.

18 **Q.** In May 2014, the Project Zebra draft report for

19 discussion was produced. You say at paragraph 53 of

20 your statement that you were heavily involved in Project

21 Zebra; is that right?

22 **A.** Yes, I was.

23 **Q.** Ahead of the publication of the report, the work being

24 done by Deloitte was discussed at a Post Office Limited

25 Board meeting on 30 April 2014. Could we have the

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1 "Chris Aujard explained that several of the

2 subpostmasters who were challenging Horizon had made

3 allegations about 'phantom' transactions which were

4 non-traceable. Assurance from Deloitte about the

5 integrity of the system records logs would be very

6 valuable."

7 Were the discussions summarised here at (c) to (e)

8 referring to work on remote access or not?

9 **A.** I think (e) in particular, yes.

10 **MS PRICE:** Sir, if that's a convenient moment, I suggest we

11 might want to break for lunch now.

12 **SIR WYN WILLIAMS:** All right. Well, just one more question

13 from me.

14 A little while ago, you told me that you were

15 consistently being told that remote access was not

16 possible but I wasn't clear whether the persons telling

17 you that that was the case were Post Office personnel or

18 Fujitsu personnel, or both.

19 **A.** It was both.

20 **SIR WYN WILLIAMS:** It was both. Those were in direct

21 conversations?

22 **A.** From what I recall, yes. So, on one side, Post Office,

23 the Architects Team, and I think there's documentation

24 in the Inquiry pack, where you can see emails where I've

25 been given consistent messaging as well.

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1 minutes of that meeting on screen, please.

2 I promise, sir, this will be brief before lunch.

3 The reference is POL00150285.

4 You see here the minutes, 30 April 2014, Post Office

5 Limited Board meeting and, on the first page, we can see

6 you were in attendance, scrolling down a bit, please, as

7 Chief Information Officer to address a particular issue,

8 so "(minute 14/55)", and then going, please, to page 6

9 of this document, the heading "Horizon -- Deloitte

10 Report", and at (a):

11 "The Board welcomed Lesley Sewell, Chief Information

12 Officer, and Gareth James, partner, Deloitte, to the

13 meeting. Chris Aujard also rejoined the meeting."

14 Then at (c) to (e), the minutes say this:

15 "Lesley Sewell explained that the first piece of

16 work Deloitte had been asked to undertake was to give

17 assurance that the control framework including the

18 security and processes for changes in the system, were

19 robust from an IT perspective.

20 "Gareth James reported that all of the work to date

21 showed that the system had strong areas of control and

22 that its testing and implementation were in line with

23 best practice. Work was still needed to assure the

24 controls and access at the Finance Service Centre."

25 At (e):

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1 **SIR WYN WILLIAMS:** Given that you didn't begin at the Post

2 Office until -- I think it's April 2010, just so I can

3 be clear, was this in the period between April 2010 and

4 the publication of the Second Sight Interim Report or

5 was it a wider period, even than that, in the sense that

6 it went beyond the date of the publication of the Second

7 Sight Report?

8 **A.** So, to the best of my recollection, I think it went

9 beyond the Second Sight Report because we were trying

10 hard to get to the bottom of the Bracknell issue with

11 the testing.

12 **SIR WYN WILLIAMS:** Yes, all right. What time shall we start

13 again, Ms Price?

14 **MS PRICE:** 2.00, sir. It's only just past 1.00 now.

15 **SIR WYN WILLIAMS:** Yes, fine. 2.00.

16 **MS PRICE:** Thank you.

17 (1.04 pm)

18 (The Short Adjournment)

19 2.00 pm)

20 **MS PRICE:** Hello, sir, can you still see and hear us?

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

22 **MS PRICE:** Ms Sewell, before lunch we had just looked at the

23 board minutes from 30 April 2014 meeting and the

24 expectation that was expressed at that board meeting was

25 that Deloitte would be providing assurance about the

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1 integrity of the system records logs, and that was in
2 the context of subpostmasters challenging Horizon. You
3 and Mr Aujard had been heavily involved in the Deloitte
4 work on Project Zebra, hadn't you?

5 **A.** Yes.

6 **Q.** You read the report when it was delivered?

7 **A.** Yes.

8 **Q.** Can we have the report on screen, please. The reference
9 is POL00107160. We can see the title on the front
10 "Horizon: Desktop Review of Assurance Sources and Key
11 Control Features". Scrolling down a bit, "Draft for
12 discussion", and the date, 23 May 2014.

13 Going to page 31 of this document, please. We have
14 here under (f) -- under this area "Key matters for
15 consideration" -- "Hardware controls over the audit
16 store". It says this:

17 "The Centera EMC devices used to host audit store
18 data have not been configured in the most secure EC+
19 configuration. As a result, system administrators on
20 these boxes may be on able to process changes to the
21 data stored within the audit store, if other alternative
22 software controls around digital seals, and key
23 management are not adequately segregated from Centera
24 box administration staff. Privileged access to the
25 cryptographic solution around digital signatures, and

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1 possible?

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

3 **Q.** Then, under (g) the first bullet:

4 "Branch database: We observed the following in
5 relation to the branch database being:

6 "A method for posting 'balancing transactions' was
7 observed from technical documentation which allows for
8 posting of additional transactions centrally without the
9 requirement for these transactions to be accepted by
10 subpostmasters (as 'transaction acknowledgements' and
11 'transaction corrections' require). Whilst an audit
12 trail is asserted to be in place over these functions,
13 evidence of testing of these features is not available
14 ..."

15 Then at the third bullet point:

16 "For 'balancing transactions', 'transaction
17 acknowledgements', and 'transaction corrections' we did
18 not identify controls to routinely monitor all centrally
19 initiated transactions to verify that they are all
20 initiated and actioned through known and governed
21 processes, or controls to reconcile and check data
22 source which underpin current period transactional
23 reporting for subpostmasters to the Audit Store record
24 of such activity."

25 Then at the bottom:

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1 publicly available formulas on MD5 hashed digital seals
2 would potentially allow privileged users at Fujitsu to
3 delete a legitimate sealed file, and replacement with
4 a 'fake' file in an undetectable manner."

5 What did you think when you saw that Fujitsu could
6 delete a legitimate sealed file and replace it with
7 a fake file in an undetectable manner?

8 **A.** So, to the best of my recollection, I would have talked
9 to Deloitte about this particular finding and, to go
10 through it, it was a theoretical possibility, because
11 you would have had to have -- this was about the
12 administrators who looked after us after the hardware
13 itself and the administrators who would look after the
14 database itself, coupled with being able to digitally
15 seal and provide the MD5#, so you would have had to have
16 a number of people to collude in this.

17 The other point at this point in time, and I do
18 vaguely remember this, was my surprise at being able to
19 do that because my understanding had always been that --
20 and I think I've covered this in my witness statement --
21 that it was a WORM solution, so it was Write Once Read
22 Many times. So there was nothing you could do with that
23 audit store once it was -- once a transaction had been
24 applied to it.

25 **Q.** So this was something that you had hitherto thought not
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1 "Controls that would detect when a person with
2 authorised privileged access used such access to send
3 a 'fake' basket into the digital signing process could
4 not be evidenced to exist."

5 Again, what did you think when you read those
6 aspects of this report?

7 **A.** So this one was more material for me because it actually
8 demonstrated that a transaction had been inserted into
9 the branch database and, forgive me, because -- so I'm
10 trying to recollect from the papers that I was given as
11 part of the Inquiry -- and -- and it was, it was around
12 the balancing transaction, that was the material point
13 because I didn't think -- I didn't think it was
14 possible.

15 **Q.** This report established, did it not, that something that
16 Second Sight had been assured could not be done could
17 actually be done.

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

19 **Q.** Knowing the importance of the issue to the integrity of
20 Horizon audit data and given your involvement in dealing
21 with Second Sight, did you not think it was important to
22 bring this to their attention?

23 **A.** So, at the time, the business had, or Post Office had,
24 a separate -- it was a separate organisational structure
25 to deal with Second Sight and the person who was on that

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1 organisational structure who was party to this was Chris
 2 Aujard. So, whilst I didn't directly tell Second Sight
 3 of this, I would have thought rightly, it would have
 4 gone through that structure.
 5 **Q.** Did you seek to identify any assurance work which needed
 6 to be completed in response to the report?
 7 **A.** So -- and I have a real gap with what happened after the
 8 Deloitte report and largely because I haven't had that
 9 much information provided by the Inquiry, and the second
 10 half of that year was very heavy for me, in terms of
 11 what was happening with separation and Fujitsu, as
 12 an exiting supplier. From memory -- and these are very
 13 vague memories -- I do remember the escalation(?) --
 14 I think that Information Security were heavily involved
 15 in this, in terms of actions, and I've seen reference to
 16 a meeting that I potentially attended, as well, at that
 17 point.
 18 But I have a real gap in terms of what did or didn't
 19 happen after that. I'm really sorry.
 20 **Q.** Do you recall who, within the Post Office, you discussed
 21 the Deloitte report with?
 22 **A.** Yes, I do. So I definitely spoke to Chris Aujard and
 23 Paula Vennells.
 24 **Q.** Could we have on screen, please, POL00031409. This was
 25 the Project Zebra Action Summary. We can see there the

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1 "Recommended remediation:
 2 "The solution currently in place may be able to
 3 undertake the level of logging required within the
 4 Horizon solution. It is recommended that the current
 5 logging and logs are reviewed on a daily basis.
 6 "This needs to be investigated further and the
 7 options on how to handle this defined through the risk
 8 management process and based on the solutions already in
 9 place or ones that could be procured to handle this."
 10 It's plain from this document, isn't it, that these
 11 people in the Post Office understood that data could be
 12 deleted, and that would not be immediately apparent to
 13 the Post Office, let alone postmasters?
 14 **A.** As part of the output from the Deloitte review.
 15 **Q.** I'm talking in general terms, from this document
 16 engaging with the Deloitte review.
 17 **A.** Sorry, I've --
 18 **Q.** It's my fault. I'll repeat the question.
 19 **A.** Oh, sorry.
 20 **Q.** Looking at this document, which is engaging with the
 21 Deloitte report, and we've been to the relevant
 22 paragraphs in that, certainly the people who were named
 23 on the front of the report understood that data could be
 24 deleted, and that wouldn't be immediately apparent to
 25 the Post Office or postmasters.

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1 date, 12 June 2014. The author is James Rees; reviewer
 2 Emma McGinn; review and sign off, Julie George. Do you
 3 recall those individuals?
 4 **A.** So I do recall Julie because I recruited Julie.
 5 **Q.** What was Julie's role?
 6 **A.** She was Head of Information Security.
 7 **Q.** In essence, this is a document dealing with what the
 8 organisation needed to do to meet the Deloitte concerns;
 9 that's right, isn't it?
 10 **A.** Yes, it is.
 11 **Q.** If we go to page 6, please, and paragraph 4.2.2. This
 12 is "Data Logging". It says:
 13 "One point raised in the report was that it was
 14 possible for someone with privileged access to delete
 15 data from specific areas of Horizon. This is always
 16 a risk with individuals using admin or power user
 17 accounts and is a persistent risk, one that needs to be
 18 catered for in almost any organisation.
 19 "Due to the sensitive nature of the information
 20 contained in the databases, monitoring of those
 21 databases should be put in place using technology to
 22 detect and record deletions and administrative changes
 23 to the databases. If possible, alerts should also be
 24 generated for mass deletions and high level risk changes
 25 to database schemas.

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1 **A.** So how I've read that, since I've just received it, was
 2 that this was related to the audit file, the Deloitte
 3 report.
 4 **Q.** Okay.
 5 **A.** If you wouldn't mind just -- so I could re-read it --
 6 **Q.** Yes, we can scroll back up.
 7 **A.** If you wouldn't mind because this document I did just
 8 receive recently.
 9 **Q.** Of course. If you scroll down to the bottom of page 6,
 10 we're looking for 4.2.2. So the point here being
 11 addressed is the one raised in the report, that it was
 12 possible for someone with privileged access to delete
 13 data from specific areas of Horizon.
 14 So my question is: looking at that, which is
 15 engaging with that aspect of the review, at least the
 16 individuals, on the face of this summary document, were
 17 aware of this fact at this point, that it was for
 18 someone with privileged access to delete data from
 19 specific areas of Horizon?
 20 **A.** So that's how it reads.
 21 **Q.** Did you see this document in 2014?
 22 **A.** I can't recall seeing it. As I've said, I've got a real
 23 memory gap between the Deloitte report and into 2015.
 24 I've just got a real gap -- gap there and it's largely
 25 because of probably everything else that was under way

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1 at the time.
 2 **Q.** Could we have on screen, please, POL00346958. This is
 3 an email from Julie George, whose name was on the review
 4 and sign off for that report we've just looked at. It's
 5 dated 17 June 2014 and it's to Rod Ismay, David Mason,
 6 Malcolm Zack, copied to Gina Gould. She says this, and
 7 is attaching Zebra Action Summary version 0.3:

8 "Hello all,

9 "I have tried to call you Rod -- attached a Draft
 10 Summary of actions arising from Deloitte's recent piece
 11 of work on the Horizon systems.

12 "Clearly there is no blame attached anywhere, and
 13 this morning's meeting with Chris Day, Chris Aujard,
 14 Lesley and Malcolm -- focused on what we would need to
 15 put in place as an organisation to address overall
 16 assurance on all critical systems, starting with Horizon
 17 from 1 April.

18 "Detailing appropriate industry standards and
 19 controls our business should be following against a risk
 20 based priority mechanism.

21 "Rod we would be happy to come to Chesterfield,
 22 however it would be better (more cost effective) if we
 23 could have a morning or afternoon in the next week or so
 24 at Old Street.

25 "We 4 will need to be comfortable that we have
 113

1 in the morning, and this is to Mark Davies and to you,
 2 subject "Urgent: Accessing Horizon". She says this:
 3 "Dear both, your help please in answers and in
 4 phrasing those answers, in prep for the [Select
 5 Committee]:
 6 "1) 'is it possible to access the system remotely?
 7 We are told it is'.
 8 "What is the true answer? I hope it is that we know
 9 this is not possible and that we are able to explain why
 10 that is. I need to say no it is not possible and that
 11 we are sure of this because of xxx and that we know this
 12 because we have had the system assured.
 13 "2) 'you have said this is such a vital system to
 14 the Post Office, what testing do you do and how often?
 15 When was the last time?'"
 16 Then underneath this:
 17 "Lesley, I need the facts on these -- I know we have
 18 discussed before but I haven't got the answer front of
 19 mind -- too many facts to hold in my head! But this is
 20 an important one and I want to be sure I do have it.
 21 And then Mark, to phrase the facts into answers, plus
 22 a line to take the conversation back up a level -- ie to
 23 one of our narrative boxes/rocks."

24 "Thanks, Paula."

25 The answers to those questions are set out in the
 115

1 a plan going forward including indicative costs of
 2 undertaking for Risk and Compliance Committee on
 3 21 July.

4 "We will need to engage with the ExCo members
 5 attached to verify and agree to support prior to the
 6 committee meeting."

7 Then asking Gina to arrange a meeting between Rod,
 8 Dave, Malcolm and her.

9 So it appears from this that you had, that morning,
 10 been at a meeting to discuss this with, among others,
 11 Chris Aujard. Does that help with your recollection
 12 of involvement at this stage?

13 **A.** So I must have been at a meeting but I'm really
 14 struggling to remember it.

15 **Q.** Can you help at all with whether the recommendations
 16 were implemented by 1 April the following year?

17 **A.** I'm sorry, I can't.

18 **Q.** That document can come down now. Thank you.

19 In 2015, Paula Vennells was seeking assistance on
 20 remote access in advance of her attendance before the
 21 Select Committee; do you recall that?

22 **A.** I vaguely recall it.

23 **Q.** Could we have on screen, please, POL00029812. Looking
 24 first, please, at page 5 -- scrolling down, please -- we
 25 have an email from Paula Vennells, 30 January 2015, 7.29
 114

1 emails which are further up in this email chain. So if
 2 we can just go through them. The one above, this is
 3 from Kevin Lenihan, 30 January, to Pete Newsome:

4 "Pete,

5 "My phone call earlier today refers.

6 "I need some urgent information as per Paula's note
 7 please."

8 Then above:

9 "Mark,

10 "As discussed, can you hook up with Kevin to review
 11 what answers have already been provided to Second Sight
 12 as this should form the Post Office response."

13 Then up again, we have an email here from Mark
 14 Underwood to James Davidson, copied to Kevin Lenihan,
 15 and he says -- apologies, if we can just scroll down,
 16 please, to the bottom of this email.

17 Going back up again. There's no sign off there.

18 Who was Mark Underwood?

19 **A.** I don't know who Mark Underwood was.

20 **Q.** He says:

21 "Hi Kevin my proposed answer to the first question
 22 below (it can be sent in its entirety to Mel and she can
 23 pick and choose). Though this will need to be signed
 24 off by James as accurate [so James Davidson].

25 "In terms of second question, I cannot find anything
 116

1 on the testing carried out. It could very well have
2 been sent to one of my predecessors but I cannot find it
3 anywhere."

4 Then "In terms of [question] 1:

5 "This question often phrased by applicants and
6 Second Sight is:

7 ""Can Post Office remotely access Horizon?""

8 The answer:

9 "Phrasing the question in this way does not address
10 the issue that is of concern to Second Sight and
11 applicants. It refers generically to 'Horizon' but more
12 particularly is about the transaction data recorded by
13 Horizon. Also, the word 'access' means the ability to
14 read transaction data without editing it -- Post
15 Office/Fujitsu has always been able to access
16 transaction data however it is the alleged capacity of
17 Post Office/Fujitsu to edit transaction data that
18 appears to be of concern. Finally, it has always been
19 known that Post Office can post additional, correcting
20 transactions to a branch's accounts but only in ways
21 that are visible to subpostmasters (ie transaction
22 corrections and transaction acknowledgements) -- it is
23 the potential for any hidden method of editing data that
24 is of concern.

25 "Can Post Office or Fujitsu edit transaction data
117

1 sent from a Horizon terminal. This allows Horizon to
2 run a check at the data centre for missing baskets ...
3 or additional baskets that would cause duplicate numbers
4 ...

5 "All transaction data in the audit store is
6 digitally sealed -- these seals would show evidence of
7 tampering if anyone, either inadvertently, intentionally
8 or maliciously, tried to change the data within a sealed
9 record."

10 Then:

11 "Automated daily checks are undertaken on JSNs
12 (looking for missing/duplicate baskets) and on the
13 digital seals (looking for evidence of tampering)."

14 Going down, please. Then we go back up to the email
15 above this.

16 Kevin Lenihan then sends this to Mark Underwood,
17 James Davidson, Melanie Corfield, also on 30 January
18 2015. This provides bullets in relation to question 2.
19 Just going up again, please. Then we have this from
20 Kevin Lenihan and this is the final answer in an email
21 from Kevin Lenihan to Mark Underwood, Melanie Corfield,
22 copied to Pete Newsome, Dave Hulbert, you, Dave King,
23 Julie George, James Davidson. It says, "Update
24 [Question 1]: URGENT ACTION: Accessing horizon":

25 "Mark/Mel,

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1 without the knowledge of a subpostmaster?

2 "Post Office confirms that neither it nor Fujitsu
3 can edit transaction data without the knowledge of
4 a subpostmaster.

5 "There is no functionality in Horizon for either
6 a branch, Post Office or Fujitsu to edit, manipulate or
7 remove a transaction once it has been recorded in
8 a branch's accounts.

9 "The following safeguards are in place to prevent
10 such occurrences:

11 "Transmission of baskets of transaction data between
12 Horizon terminals in branches and the Post Office data
13 centre is cryptographically protected through the use of
14 digital signatures.

15 "Baskets must net to nil before transmission. This
16 means that the total value of the basket is nil and
17 therefore the correct amount of payments, goods and
18 services has been recorded in the basket. Baskets that
19 do not net to nil will be rejected by the Horizon
20 terminal before transmission to the Post Office data
21 centre.

22 "Baskets of transactions are either recorded in full
23 or discarded in full -- no partial baskets can be
24 recorded to the audit store.

25 "All baskets are given sequential numbers ... when
118

1 "James has had a look at your answer to [Question
2 1]. And thinks there's too much detail for Paula --
3 this was written for a different type of audience. He
4 has captured the same points but in a more appropriate
5 format:

6 "He states:

7 "Having looked again at the request from Paula, it
8 appears that the fundamentals around this question
9 (remote access) are not understood. I suggest that
10 Paula is briefed along the lines of the following.

11 "1) No transaction data is held locally in any
12 branch. Transactions are complete and stored in
13 a central database and copies of all data is sent to
14 a secure audit database.

15 "2) Subpostmasters directly manage user access and
16 password setting locally so system access (to create
17 transactions) are limited to approved local personnel
18 only who are responsible for setting their own
19 passwords. Users are only created following an approval
20 process. All subsequent transactions are recorded
21 against the ID used to log on to the system.

22 3) Once a transaction has been completed, there is
23 no functionality (by design) for transactions to be
24 edited or amended. Each transaction given is a unique
25 number and 'wrapped' in a digital encryption seal to
120

1 protect if its integrity. All transactions are then
 2 posted to a secure and segregated audit server."
 3 Then fourth:
 4 "On approval, there is the functionality to add
 5 additional transactions which will be visible and have
 6 a unique identifier in the audit trail. This is
 7 extremely rare and only been used once since Go Live of
 8 the system in 2010 (March 2010).

9 "5) Support staff have the ability to review event
 10 logs and monitor, in real time, the availability of the
 11 system infrastructure as part of standard service
 12 management processes.

13 "6) Overall, system access is tightly controlled by
 14 industry standard 'role based access' protocols and
 15 assured independently in annual audits for ISO 27001,
 16 Ernst & Young for IAS 3402 and as part of PCI audits."

17 Then at the bottom:

18 "Mel/Mark -- I'll assume that you are okay with this
 19 final position, unless I hear differently. James has
 20 advised that he is contactable over the weekend ..."

21 So going up to the top, please, we can see this was
 22 copied to you. On reading this email and knowing what
 23 you knew at the time from the Deloitte report, do you
 24 think that this information being provided was accurate?

25 **A.** The point around the balancing transaction, I understood
 121

1 close enough at that time, because of everything else
 2 that was going on, and it was a particularly difficult
 3 time for me. I wanted to make sure that it was
 4 accurate, the information that was being provided.

5 I can't remember the point about the deletion and
 6 it's with regret, if I have forgot it. But I had asked
 7 the experts, who were close to this on a day-to-day
 8 basis, to provide the necessary information. So I felt
 9 as if I had acted correctly in doing that. Sorry.

10 **Q.** Of course. Do you want to take a break?

11 **A.** No, I'm fine. It's okay.

12 **Q.** If we can scroll up to the top, please, of this
 13 document. Just for completeness, we can see Melanie
 14 Corfield there, Friday, 30 January -- scrolling down
 15 a bit, please, so we can see:

16 "Thanks again to everyone. This all provides the
 17 reassurance needed for Paula in my view re any
 18 [questions] that come up on this. If we get more
 19 queries on any aspect I will let you know."

20 That email seems, doesn't it, as though Ms Corfield
 21 has read the email below, at least to provide the
 22 reassurance that Paula Vennells was seeking in that
 23 original email, ie "No, this is not possible because";
 24 would you agree?

25 **A.** That's what it appears.
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1 it as being accurate.

2 **Q.** Well, let's have a look at which point you're referring
 3 to. Scrolling down, please.

4 **A.** So it's point 4.

5 **Q.** So number 3:

6 "Once a transaction has been completed, there is no
 7 functionality (by design) for transactions to be edited
 8 or amended", et cetera.

9 Then there's the fourth point, which is
 10 an exception, in effect:

11 "On approval, there is functionality to add
 12 transactions which will be visible and have a unique
 13 identifier in the audit trail ... extremely rare ..."

14 There is no mention here, is there, of the ability
 15 to delete transactions, for example, casting your mind
 16 back to the points we read about in the report?

17 **A.** There isn't and I can remember, and I can see in the
 18 documents I was provided with, that -- and so, from the
 19 Deloitte report to January, I have a real gap, because
 20 I can't remember what the actions were taken, and that's
 21 with deep regret from my perspective.

22 The action -- I actually asked Julie George, who was
 23 the Head of Information Security, because I can see from
 24 the emails that I've been provided with, I wanted to
 25 make sure that it was accurate information and I wasn't
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1 **Q.** Then the top email, Dave Hulbert, who is Head of IT
 2 Services by this point:

3 "Kev

4 "Good outcome and thanks for pulling all of this
 5 together. Really appreciated."

6 That's to him and to you.

7 Again, for completeness, we could have on screen
 8 please POL00162308. Scrolling down, please, so we can
 9 see the email below, we can see that's the email we've
 10 just been through the detail of from Kevin Lenihan,
 11 looking at the answer to question 1, just scrolling down
 12 so we can see that. Then going back up, please, to the
 13 top, that then appears to be forwarded by you to Mark
 14 Davies, do you see that, on Friday, 30 January?

15 **A.** Yes.

16 **Q.** There are no comments on that from you. Did it occur to
 17 you at the time that this was inaccurate in any way?

18 **A.** My point of reference at this point or the last point of
 19 reference was the balancing transaction, and I can't
 20 recall actually reading that -- I must have read it if
 21 I've sent it on, but I can't -- reading it now, it's in
 22 there the balancing transaction. It probably should
 23 have been clearer.

24 **MS PRICE:** Sir, those are all the questions that I have for
 25 Ms Sewell. There are some questions from Core
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1 Participants. I wonder if we might take the afternoon
 2 break early at that point, just so that I can establish
 3 who and in what order, and time estimates.
 4 **SIR WYN WILLIAMS:** Yes, by all means. That sounds fine.
 5 **MS PRICE:** Sir, if we can take 15 minutes now, sir, we are
 6 not pressed for time, coming back at 2.50, please.
 7 **SIR WYN WILLIAMS:** Yes, fine.
 8 **MS PRICE:** Thank you.
 9 (2.34 pm)
 10 (A short break)
 11 (2.50 pm)
 12 **MS PRICE:** Hello, sir.
 13 **SIR WYN WILLIAMS:** Hello.
 14 **MS PRICE:** We have questions from Ms Page and from
 15 Mr Moloney. Ms Page will be no more than 30 minutes and
 16 Mr Moloney will be no more than 10 minutes.
 17 **SIR WYN WILLIAMS:** All right.
 18 **MS PRICE:** Thank you, sir.
 19 **Questioned by MS PAGE**
 20 **MS PAGE:** Thank you. Ms Sewell, would you say that there
 21 were cliques within the Vennells/Perkins management
 22 regime?
 23 **A.** Sorry, I didn't catch that.
 24 **Q.** Would you say that there were cliques within the
 25 management regime under Ms Vennells and Ms Perkins'

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1 **A.** It was probably late 2014.
 2 **SIR WYN WILLIAMS:** Right. Thank you.
 3 **MS PAGE:** Now, you also described earlier today how you
 4 effectively fell in with using the word "anomaly" even
 5 though, in your own words, that was a "mad" word to use
 6 and the correct word was "fault"?
 7 **A.** Yes, that is correct.
 8 **Q.** Do you think that's the sort of thing that happens in
 9 a management environment where people have to curry
 10 favour, people have to get on the right side of those
 11 above them?
 12 **A.** So I didn't do that to curry favour. That was
 13 a direction that we were asked to take. So it wasn't
 14 about myself trying to curry favour.
 15 **Q.** All right. You also told us that no one had taken
 16 ownership of the 2011 EY audit, which had various
 17 actions following. So that's the first of two topics
 18 that I want to take you to overall. Just to refresh,
 19 that audit in 2011, it exposed some problems around
 20 keeping track of who could access what within the
 21 Horizon system?
 22 **A.** Yes.
 23 **Q.** The EY management letter said:
 24 "This may lead to the processing of erroneous or
 25 unauthorised transactions."

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1 leadership?
 2 **A.** Cliques, as in?
 3 **Q.** Were there people who were in favour, people who then
 4 fell out of favour?
 5 **A.** I'm -- sorry, apologies. I'm just trying to think to
 6 answer your question. I don't know whether I would call
 7 them cliques but there was -- certainly you would have
 8 different groups of people who would come together.
 9 **Q.** You describe in your witness statement at paragraph
 10 73 -- and I don't need to take you to it -- how you fell
 11 out of favour, if you like, and how you felt you were
 12 isolated and unable to do your job. Now, I don't want
 13 to distress you unnecessarily but that's how things --
 14 **A.** Sorry, that particular period was very difficult for me
 15 and it still is very difficult. So I'm really sorry
 16 that I'm getting upset about it.
 17 **Q.** Don't worry. Don't worry.
 18 All I'm trying to get clear about is that that was
 19 an example, perhaps, of the way sometimes people would
 20 get the cold shoulder and find themselves on the
 21 outside; is that fair?
 22 **A.** Well, I did feel on the outside at that point.
 23 **SIR WYN WILLIAMS:** Can I ask you just approximately from
 24 when you felt on the outside, just so I can have some
 25 idea of it. I don't need the details of it, just --

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1 **A.** Yes.
 2 **Q.** All right. Now, in January of the following year of
 3 2012, there was an RMG Internal Audit report, which
 4 picked up on some of the actions from that; do you
 5 remember that?
 6 **A.** Yes, because I requested it.
 7 **Q.** You actually requested that, did you?
 8 **A.** Yes, I did.
 9 **Q.** Well, that's helpful to know. All right, let's have
 10 a look at that. That's POL00030217. When we get there
 11 I want to start, first of all, by going to page 7 where
 12 we see the names --
 13 Oh, sorry, I've given the wrong reference,
 14 POL00029114. I'm so sorry. That's the management
 15 letter but we don't actually need to go to that. So if
 16 we scoot down to page 7, we'll see the names of those
 17 who received this report.
 18 We can see on the left, these are the POL names:
 19 Susan Crichton, Christopher Day, Kevin Gilliland, Andy J
 20 Jones -- that's probably a relatively new name for the
 21 Inquiry -- Neil Lecky-Thompson, you, Paula Vennells --
 22 at that point Managing Director, so this is
 23 pre-separation, isn't it -- and Mike Young, Chief
 24 Operating Officer.
 25 Now, am I right in saying that, on the right-hand

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1 side, those are RMG names: Derek K Foster, Internal
 2 Audit; Moya Greene, Chief Executive of RMG; is that
 3 right?
 4 **A.** So I recognise some of those names but not all of them.
 5 **Q.** Am I right in saying Moya Greene, Chief Executive of RMG
 6 rather than POL.
 7 **A.** Yes.
 8 **Q.** Then we've also got Chief Financial Officer, Chief of
 9 Staff, Head of Risk, and then Ernst & Young themselves,
 10 of course --
 11 **A.** Yes.
 12 **Q.** -- the people who had written the audit and management
 13 letter. All right, so those are the recipients.
 14 If we could perhaps have a look first at page 9.,
 15 what we see is the heading "Appendix B -- Update on
 16 Actions Arising from 2011 E&Y Audit". So that's pretty
 17 clear of what's going on there: that's a summary of what
 18 E&Y had recommended; am I right?
 19 **A.** Yes.
 20 **Q.** What we see on the right-hand side is the status of the
 21 actions?
 22 **A.** Yes.
 23 **Q.** We've got "Substantial progress made" or "Further work
 24 required" against each of them.
 25 **A.** Yes.

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1 POL00143075. At the top there, we can see it says it's
 2 a "Briefing for Paula Vennells (Chief Executive) and
 3 Chris Day (chief Financial Officer)", and it's about the
 4 "Post Office IT General Controls, Ernst & Young Audit
 5 2011/12".
 6 Now, bearing in mind, of course, that Paula Vennells
 7 was one of the recipients of that RMG Internal Audit
 8 report that we've just looked at --
 9 **A.** Yes.
 10 **Q.** -- if we just confirm, if you'd like me to -- or maybe
 11 you don't need me to. If we see at page 3 that's got
 12 your name at the end and the date is 2012 on that paper;
 13 do you remember doing this?
 14 **A.** Well, I've just received this in the last few days.
 15 **Q.** Oh, I see.
 16 **A.** Yeah.
 17 **Q.** So does it ring any bells? Did it ring any bells when
 18 you read it in the last few days?
 19 **A.** It didn't but I was absolutely involved in it.
 20 I couldn't remember the detail.
 21 **Q.** What I want to take you to is a bit of an anomaly
 22 because, if we look on page 3 and if we look
 23 specifically -- I'm so sorry, page 2, paragraph 3.4. So
 24 if we just look at paragraph 3.4, it refers to that
 25 Royal Mail Group audit and it says:

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1 **Q.** Is that fair?
 2 **A.** Yes.
 3 **Q.** All right. If we now go back, please, to page 3, we
 4 don't need to read all of this page at all but what we
 5 can see is there's a sort of a summary of key findings
 6 and, in the bottom half, "E&Y Management Letter", is the
 7 heading and then, if we look down towards the single
 8 line paragraph below that, it says:
 9 "The findings, summarised in Appendix B on page 9
 10 [which is what we've just looked at], have been shared
 11 with E&Y and reflect our assessment as at the end of
 12 January 2012."
 13 Then we see below that, a line "Management
 14 Response":
 15 "We agree with this report and its findings, and
 16 will act to progress the action within the agreed
 17 timescales."
 18 That's your response, your management response?
 19 **A.** Yes.
 20 **Q.** All right. So there we are, January 2012, and all the
 21 actions either say, "Substantial progress made" or
 22 "Further work required"; all right?
 23 **A.** Yeah.
 24 **Q.** Now, what I want to do is go forward a little bit to May
 25 2012 and to a briefing paper and the paper reference

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1 "Through an independent Royal Mail Group audit
 2 conducted on the Post Office systems (November 2011), it
 3 was agreed that all actions had been completed as
 4 planned. Two actions had minor activities still to be
 5 completed, which were addressed by December 2011."
 6 So that's at odds, isn't it, with what we just
 7 looked at, which said that everything was still pretty
 8 much outstanding in January 2012. Have you got anything
 9 to help us understand that anomaly?
 10 **A.** So I don't but I can see in the appendix it included of
 11 the observations.
 12 **Q.** It does indeed. We'll go down to that because that is
 13 also rather odd. If we go down, please, to page 4,
 14 appendix A, "Summary status of the 2010/11 audit
 15 observations -- as agreed with the RMG independent audit
 16 in November 2011".
 17 Now, I hope you'll take it from me that everything
 18 below that, the finding numbers, the E&Y ratings, the
 19 summary of actions, is the same as the appendix to the
 20 RMG audit but you'll see there, on the right-hand side,
 21 instead of those words "Substantial progress made" or
 22 "Further work required", where "Substantial progress"
 23 was the wording, it's now just the colour green, and
 24 where "Further work was required", it's now just the
 25 colour yellow, and so that rather obscures, doesn't it,

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1 that there was still plenty of work to be done in
 2 January 2012?
 3 **A.** So I don't -- I really don't recall that and I think
 4 it's unusual for it not just to be lifted.
 5 **Q.** Was this briefing something that Ms Vennells asked for,
 6 do you think?
 7 **A.** I have some vague memory of Chris asking for it but,
 8 again, I've got nothing to substantiate that. It's very
 9 vague.
 10 **Q.** This was the month after Post Office had separated from
 11 Royal Mail Group and there was an ARC meeting, the first
 12 ever ARC meeting, in this same month.
 13 **A.** Right.
 14 **Q.** Do you think you got the message that loose ends had to
 15 be tidied up? That something needed to be done to make
 16 it seem like everything had been actioned when it
 17 hadn't?
 18 **A.** No, I don't recall anything of that nature. I think,
 19 just by way of context, the '11/'12 audit was
 20 a difficult audit because the '11, or '10/'11 audit
 21 reported late, and so actions were put in place
 22 throughout that year. So some actions were completed
 23 part way through a year, not for a full year, and it
 24 wasn't until the following year that you actually saw
 25 the impact of all of the actions, completed actions,

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1 "I can see reference in my notes to the EY audits".
 2 So if we just go to your notes, please, it's
 3 WITN00840103, and if we go to page 2, please. We can
 4 see in that first rectangular box that you've drawn "EY
 5 audited controls" and then a bit further down we've got:
 6 "2012/2013 -- no material.
 7 "Overall control environment not sufficient general
 8 IT controls."
 9 So, evidently, part of this conversation was about
 10 this period, wasn't it, when you had done the work to
 11 get the RMG Internal Audit, you had taken control and
 12 taken ownership. Can you tell us anything about what
 13 Ms Vennells wanted to say to you about all of that in
 14 this call?
 15 **A.** I can't remember specifically about the detail of what
 16 was discussed. I can vaguely remember the discussion
 17 around the ISA 342 (*sic*), and getting to that position
 18 and, again, I had no material, so I had nothing to refer
 19 to, and I think there was reference to a number of
 20 issues which had come out of the earlier audits, but
 21 I can't remember any detail other than that. I'm sorry.
 22 **Q.** You felt sufficiently uncomfortable, after that, to
 23 actually block Ms Vennells; is that right?
 24 **A.** Yes, I did.
 25 **Q.** If I can move, please, to the second topic that I wanted

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1 taking effect.
 2 **Q.** Would you accept that it was important for POL, at this
 3 point when it was separating, to get a grip? As you
 4 said yourself, somebody needed to take ownership of the
 5 actions, didn't they?
 6 **A.** Absolutely, and I've said that in my witness statement.
 7 **Q.** Also in your witness statement you refer at
 8 paragraph 79 -- and I will take you to this, please --
 9 at page 40, to a call that you had with Ms Vennells in
 10 2021. That was requested by her and you took some
 11 notes, didn't you?
 12 **A.** That's correct.
 13 **Q.** That's 12 April 2021?
 14 **A.** Yes.
 15 **Q.** Now, I won't read out the whole of the paragraph. If we
 16 see there's a line there:
 17 "Paula contacted me again on 12 April 2021 via text
 18 message requesting a call. We spoke for longer ... and
 19 I made a file note", and I'll take you to that shortly.
 20 You say that there are a few things that perhaps
 21 seem to be the issues. First of all, it's about the
 22 Project Zebra Deloitte report and then, if we scroll
 23 down a little bit, there's a reference to your note
 24 saying, "PV got jumpy", and that seemed to be in
 25 relation to the Deloitte report. But it then says,

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1 to ask you about. This is about your investigations --
 2 that sounds more formal perhaps than it is -- you
 3 looking into the receipts and payments mismatch bug in
 4 2013 when POL was responding to the Second Sight Interim
 5 Report, and I ask these questions specifically on behalf
 6 of my client Seema Misra, whose name I'm sure you know.
 7 I want to explore the information you may have heard
 8 about whether that bug was disclosed in her trial. All
 9 right?
 10 First of all, I want to go to POL00371710. If we
 11 scroll all the way down on this chain when we get there,
 12 please. That first email in the chain is from Gareth
 13 Jenkins to you, providing you with his witness statement
 14 in the Misra case and he explains a little bit about it,
 15 and it's evident that he's talking about a different bug
 16 that was disclosed during that case. We've come to know
 17 it as either the Falkirk bug or the Callendar Square
 18 bug. He says he's happy to dig out anything more and he
 19 says the key point is Horizon did have bugs discussed in
 20 court but POL won the case.
 21 If we go up a bit, please, to the next email --
 22 sorry, just to confirm, that's on 28 June. You forward
 23 that to Alwen Lyons, Martin Edwards and Mark Davies.
 24 Mark Davies, we can see, picks up on it:
 25 "This is massively important.

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1 "Is there also a possibility that all incidents --
2 14 and [16] [that's the two bugs] -- have been
3 referenced in court?"

4 The 64 is the receipts and payments mismatch bug,
5 isn't it?

6 **A.** Yes.

7 **Q.** So if we go a little bit further up, Alwen Lyons says,
8 "14 unlikely":

9 "Hugh, can we check, or is it quicker to ask Gareth,
10 Lesley."

11 So I think that's a question to you, really?

12 **A.** Yes.

13 **Q.** Then you respond "Will ask FJ", and that's on 28 June.
14 That's a Friday.

15 If we go to the next email, it's POL00137323,
16 page 1. We only need to look at your email on page 1.
17 This is on the Monday following that Friday, which is
18 1 July and it's at 12.57. You say to Hugh Flemington,
19 Alwen Lyons, Simon Baker and Rodric Williams:

20 "I asked the question of FJ if either ..."

21 I won't take you to it, I hope you'll take it from
22 me, you're meaning either of the two bugs:

23 "... had been referenced in any of the cases,
24 regarding these two issues -- the answer is no."

25 Do you know who you asked at Fujitsu?

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1 I just want to look at one particular bit, which is
2 actually over on the next page. This is "High level
3 points for the Board", and if we go to the bullet point
4 in the middle of the page with four blank bullet points
5 under it and there's the final one in square brackets,
6 which begins "One", so all I want to look at is that
7 one:

8 "One of the two defects has already been discussed
9 in a court case (Misra) -- being confirmed."

10 Now, we know that, in fact, it wasn't but what I'm
11 interested in is where that might have come from, where
12 that suggestion that it was raised in the Misra case
13 might have come from. Before I take you to anything
14 else, have you got any free memory of where that might
15 have come from?

16 **A.** I don't, I'm sorry.

17 **Q.** Well, then there's one other thing that I want to raise,
18 just to see if it jogs any memories. We have another
19 email chain -- and I don't need to take you to it but
20 I'll give the reference, it's POL00098797 -- and at
21 page 2 of that, it's clear that you and Mr Ismay had
22 been tasked together, on 28 June, so on the Friday, to
23 look into both the bugs. So do you remember that you
24 were working with Mr Ismay on that?

25 **A.** I've seen, in the bundle that I have, that there was

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1 **A.** I don't but I do want to say I feel so deeply about all
2 of the subpostmasters and your client, in particular.

3 **Q.** I know you're doing what you can, so --

4 **A.** But I can't remember who I asked in Fujitsu.

5 **Q.** Did you have a direct relationship with Gareth Jenkins?

6 **A.** No, I didn't.

7 **Q.** So when he sent you that email with his witness
8 statement from that case attached, was that unusual?

9 **A.** It was very unusual and I think I've said that in my
10 witness statement.

11 **Q.** So you don't think -- I'm just speculating, maybe
12 I shouldn't: do you think you would have contacted
13 Gareth Jenkins to ask him?

14 **A.** I really don't know because my main contacts at Fujitsu
15 were the Account Executives. It was rare that I would
16 talk to people under the Account Executives.

17 **Q.** Well, let's then just look at a different email from
18 very much the same time, which may shed a little further
19 light, POL00060587. We can see that Mr Flemington seems
20 to have been at his kids' school sports day or something
21 but, if we go down, there's an email from him slightly
22 earlier in the day. So not a dissimilar time to the one
23 that we've just looked at from you, 13.16 on 1 July, and
24 you are copied in along with a crowd of people but also
25 including Jarnail Singh.

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1 some emails which shows we were trying to find out more
2 information.

3 **Q.** Did Mr Ismay appear to you to have a reasonable
4 understanding about the receipts and payments mismatch
5 bug?

6 **A.** I can't remember. I can't remember if he did or didn't,
7 but I would be surprised if he didn't.

8 **Q.** Well, certainly, there's evidence that shows that he was
9 at that meeting that Ms Price took you to earlier, in
10 November 2010, when the three solutions were being
11 discussed --

12 **A.** Yes.

13 **Q.** -- so that does tally up. We also know that he was
14 playing close attention to the Seema Misra trial.

15 Was it Mr Ismay who suggested that the receipts and
16 payments mismatch bug might have been revealed in the
17 Misra trial?

18 **A.** I don't know. I really don't know.

19 **Q.** What about Mr Singh? Did he say anything to you about
20 the Seema Misra trial or the receipts and payments
21 mismatch bug?

22 **A.** I don't believe I had any dealings with Mr Singh.

23 **Q.** You didn't?

24 **A.** No.

25 **Q.** You don't know him very well?

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1 A. No. I know he's been copied on some emails but I didn't
 2 have any dealings with him.
 3 Q. So it wouldn't have been him who said anything like
 4 that, at least not to you?
 5 A. I can't -- not to me.
 6 MS PAGE: All right. Well, thank you, Ms Sewell. Those are
 7 my questions.
 8 THE WITNESS: Thank you.
 9 SIR WYN WILLIAMS: Thank you Ms Page.
 10 Mr Moloney?
 11 MR MOLONEY: Thank you, sir.
 12 **Questioned by MR MOLONEY**
 13 MR MOLONEY: Ms Sewell, you worked closely with Chris Aujard
 14 on Project Zebra, the Deloitte report?
 15 A. Yes.
 16 Q. It appears that you were present at a morning meeting
 17 with him, referred to in the email from Julie George
 18 attaching the Zebra Action Summary that Ms Price has
 19 recently asked you about?
 20 A. Yes.
 21 Q. Ms Price asked you about whether you informed Second
 22 Sight about the ability of Fujitsu to delete
 23 transactions in an undetectable way, and you said that
 24 it would have been for Mr Aujard to inform Second Sight?
 25 A. That's largely because there was -- as I've said, and
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1 memory, your memory is not great around that time, but
 2 do you remember you, or any of your department, saying
 3 to Mr Aujard that there were no persons with the
 4 requisite access?
 5 A. No.
 6 Q. Do you remember you or any of your department saying to
 7 Mr Aujard that this was not a critical or significant
 8 matter?
 9 A. Not that I recall.
 10 MR MOLONEY: Thank you very much.
 11 SIR WYN WILLIAMS: Is that it, Ms Price?
 12 MS PRICE: Yes, sir, it is.
 13 SIR WYN WILLIAMS: Well, Ms Sewell, thank you very much for
 14 making your witness statement and thank you very much
 15 for coming to give evidence in person before the
 16 Inquiry. I'm grateful to you for participating in that
 17 way.
 18 THE WITNESS: Thank you.
 19 SIR WYN WILLIAMS: Right. So we'll adjourn until tomorrow
 20 morning when we have Mr Cameron; is that correct?
 21 MS PRICE: That's correct, sir.
 22 SIR WYN WILLIAMS: Fine.
 23 MS PRICE: Thank you.
 24 (3.19 pm)
 25 (The hearing adjourned until 9.45 am the following day)
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1 the Inquiry will know, there was a Project Sparrow set
 2 up, and I was not part of that, so the line would've
 3 been through --
 4 Q. A different stream --
 5 A. Yes.
 6 Q. -- and it would have been Mr Aujard, rather than you?
 7 A. Yes.
 8 Q. When I asked questions of Mr Aujard, I asked him about
 9 the Zebra Action Summary and the meeting you and he had
 10 with Julie George and others, just as you've just been
 11 asked by Ms Price.
 12 A. Yes.
 13 Q. I asked him whether or not he informed Second Sight
 14 about the contents of the Deloitte report and the Zebra
 15 Action Summary. He said, in response:
 16 "The sense from those that were reviewing the
 17 Deloitte report was not that this was a critical or
 18 significant matter and I don't know why that is the
 19 case. Clearly, the matter was considered and discussed
 20 by numerous people internally. It could be -- and
 21 I don't want to speculate but it could be -- that there
 22 were no persons with the requisite access rights and
 23 that was the reason or there could be other reasons for
 24 it."
 25 Now, I appreciate this is a difficult time for your
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