

Witness Name: Anthony John de Garr Robinson

Statement No: WITN10500200

Dated: 10 June 2024

## POST OFFICE HORIZON INQUIRY

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### SECOND WITNESS STATEMENT OF ANTHONY JOHN DE GARR ROBINSON

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I, Anthony John de Garr Robinson, will say as follows.

1. I wish to correct my statement dated 14 May 2024 (WITN10500100) in the following ways.
2. Paragraph 29, last sentence: "of" should be replaced by "on".
3. Paragraph 31, last sentence: "tasking" should be replaced by "taking".
4. Paragraph 32, second sentence: delete the rogue ")".
5. Paragraph 42: at the end of the first sentence, insert "and drafting suggestions".
6. Paragraph 88: having had a greater opportunity to read the documents which were provided to me prior to 14 May 2024 and an opportunity to read the additional documents which were provided to me on 31 May 2024 and 4 June 2024, I am reminded that POL's case on remote access changed substantially during the run up to the Horizon trial. In particular:
  - (1) When it served its first round of witness statements on 27 September 2018, POL's case was that 1) Fujitsu had the ability to inject transactions into branch accounts (called Balancing Transactions in Horizon Online), and 2) although certain Fujitsu specialists had privileged user rights which

they could in theory use to amend or delete transaction data in branch accounts, POL had never consented to this being done and, to the best of POL's information and belief, these rights had never been used for this purpose.

- (2) By the time the Horizon trial started, POL's case on what Fujitsu could and did do with branch transaction data was more complicated than that. A summary of POL's ultimate case is given in paragraphs 54, 55, and 57 to 60 of POL's closing submissions (POL00026925). In particular, POL stated that there were rare occasions on which Fujitsu's privileged user rights had been used to insert, amend and delete branch transaction data and, where this happened, POL's permission was obtained and these matters were documented (in documents called OCRs and MSCs).
- (3) I can see from the documents that POL's case changed in stages as the trial approached. I do not have a clear recollection of each and every change or when it happened, but I think that the changes were reactions to discoveries that were made. Mr Roll's witness statements had a part to play in this process (in relation to Legacy Horizon) and various documents identified by Mr Coyne and possibly others also had a part to play. These things prompted further evidence from the two Fujitsu witnesses about remote access. I have not had an opportunity to read Dr Worden's expert reports and so I cannot say how his analysis developed. Nor do I know why these matters were not revealed by the investigations that Deloitte made between 2016 and 2018 or why, during the same period, the persons instructing me at POL were apparently unaware of the fact that members of staff at POL would have authorised Fujitsu to use its privileged user rights in these ways.

7. Paragraph 89: as I say in that paragraph, Mr Roll's witness statement was a striking development. However, in the light of the other revelations described in paragraph 5 above, I would say that these revelations were at least as striking.
8. Paragraph 94, last sentence: from POL00006357, I see that Simon Clarke was a barrister.
9. Paragraph 123: at the end of the paragraph, add "or even accept that they were admissible (see paragraph 819 of the Horizon Issues Judgment)".
10. Paragraph 125: this paragraph does not take into account the forms of remote access discussed in paragraph 5 above. I do not recall whether, in Worden 1, Dr Worden also addressed these forms of remote access. What I recall is thinking that his analysis of remote access was not as full as I would have liked.
11. Para 151, first sentence: "Paragraphs 616 and 617" should be replaced by "Paragraphs 615 and 616", and the second reference to "OCPs" should be to "OCRs".
12. Paragraph 162, third sentence: "WBT" should be replaced by "WBD".
13. Paragraph 172, third sentence: this sentence does not take into account all the forms of remote access described in paragraph 5 above. In the light of these forms of remote access, the sentence should read: "And at the end of the Horizon trial, I believed that the evidence showed that the Horizon system was robust, ~~and~~ that there was no realistic possibility of Fujitsu privileged users abusing their access rights so as to create false shortfalls in SPM accounts, and that, where such users were not abusing their rights, the risk of their erroneously creating false shortfalls in SPM accounts was extremely low".

I believe the contents of this statement to be true.

**GRO**

10 June 2024

**Index to Second Witness Statement of Anthony John de Garr Robinson**

<b>No</b>	<b>URN</b>	<b>Document description</b>	<b>Date</b>	<b>Control Number</b>
1	WITN10500100	First witness statement of Anthony John de Garr Robinson	14/05/2024	WITN10500100
2	POL00026925	Post Office's Written Closing for Trial of Horizon Issues in Alan Bates & Others v Post Office Limited	27/06/2019	POL-0023566
3	POL00006357	Advice on the use of expert evidence relating to the integrity of the Fujitsu Services Ltd Horizon System	15/07/2013	POL-0017625