

Witness Name: GARETH IDRIS JENKINS

Statement No.: WITN00460100

Dated: 6 FEBRUARY 2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF GARETH IDRIS JENKINS

I, Gareth Idris Jenkins, will say as follows:

1. I make this witness statement in response to a request under Rule 9 of the Inquiry Rules 2006 regarding Phases 2 and 3 of the Post Office Horizon IT Inquiry ("**the Inquiry**"). Time was extended for my response to this request.
2. I want to make clear (as has previously been stated on my behalf) that I support the work of the Inquiry and I wish to assist it. To that end, I asked the Inquiry to consider seeking an undertaking so that I could provide the Inquiry with evidence whilst at the same time being subject to an ongoing criminal investigation. That criminal investigation overlaps, to the best of my understanding, with the same issues that this Inquiry is investigating, in particular in Phase 4. I understand that the Inquiry is not minded to seek an undertaking at the present time, but rather has adopted a 'wait and see' approach.
3. I was made a Core Participant to this Inquiry on 16 November 2002. Since then, I understand that my lawyers have been provided with access to the evidence which the Inquiry has disclosed to Core Participants. However, I also understand that, as matters stand, there is not much evidence that relates to Phase 4 which has currently been disclosed. I understand that this is because

disclosure is on a rolling basis and that witnesses are not due to be called in Phase 4 until later in 2023.

4. The position that I find myself in is that I am subject to a criminal investigation which is continuing. I have attended voluntarily for interviews but I understand that I will continue to be asked to do so as the police continue to analyse evidence. I do not yet know the totality of the police investigation into my conduct, the totality of the allegations that I face or the totality of the evidence the police may have gathered. At the same time, I am asked to give evidence to the Inquiry but without having seen all of the evidence which the Inquiry holds (or is seeking) particularly in relation to Phase 4.
5. The Inquiry asked me a number of questions, many of which contained detailed sub-questions. I wish to maintain my reliance upon the privilege against self-incrimination in relation to certain of these questions for the time being, but I want to make clear my reasons for doing so. As matters stand, my lawyers are working their way through the evidence disclosed to Core Participants by the Inquiry and will continue to do so. I understand that, at the present time, they are unable to advise me fully on the privilege against self-incrimination, particularly in relation to Phase 4 because their review is ongoing and because, as explained above, the existing evidence disclosed in relation to Phase 4 is limited.
6. I therefore wish to ensure that it is understood (as I also understand my lawyers will communicate in correspondence to the Inquiry) that I will continue to keep the question of whether I waive my rights under consideration. My lawyers have undertaken to the Inquiry to notify it in good time when they are in a position to advise me fully. I want to emphasise how seriously I take these issues. I am simply asking that I be permitted the opportunity to understand better what allegations are made against me or what evidence relates to me (and how either relates to the criminal investigation I am currently subject to).
7. I will continue to prepare for the Inquiry so as to ensure that when my lawyers are in a position to advise me, that it is not a cause for delay.

8. The Inquiry has also provided me with 93 documents (“**the Documents**”) to inform the basis of my answers and/or invited my comment on them. Many of the Documents consist of lengthy and detailed technical data. Whilst this is a significant volume of material to consider and comment on, it is only a small snapshot of the material which I saw at the time, and which may be relevant to the Inquiry’s questions.
9. The events that I am asked to recall occurred between 10 and 20 years ago. Many will have assumed a greater importance as time has passed and events have unfolded, than they did at the time. My memory of them is far from perfect and I am relying to a large degree upon the Documents to assist my recall. I am not certain what I knew or understood at particular points in time. This is made more difficult without a complete documentary record and because I only learned of certain events after they happened.
10. In light of the above, and the fact that the events in question span a period of over twenty years, I have approached this statement, as I have been asked, by answering the Inquiry’s questions in light of the Documents specifically put to me and by relying on my memory of the relevant events. I think it is important to be clear that I have written this statement adhering to this approach, as requested by the Inquiry. As noted above, my solicitors and I are working through the Inquiry’s disclosure to all Core Participants and if there is evidence which touches upon my answers set out below, I will draw that to the Inquiry’s attention.
11. I have sought, where possible, to indicate when my knowledge or recollection is not contemporaneous but is based on subsequent events or what I have learned after those events. Where it is possible to do so, I have indicated what other material would assist me in recalling what the position was at a given time. Again, if there is further material that supplements or changes my understanding of the events, or my recollection of them, I may wish or need to supplement or amend what I have said in this witness statement.

Relevant background

12. I graduated with a degree in Mathematics from the University of Cambridge in 1973 and started work for International Computers Ltd (“**ICL**”) in September of that year. I continued working for ICL, which became Fujitsu Services Ltd (“**Fujitsu**”) in 2002, until I retired in 2015. From my retirement until August 2022, I was on a retainer with Fujitsu to provide *ad hoc* consultancy services. Throughout all of this time, I worked on the design and development of computer software.
13. ICL introduced a Distinguished Engineer scheme in the 1980s. I became a Distinguished Engineer at some point in the mid-1990s, at which point I believe there were approximately 100 employees who held that title. I believe it was a purely honorific title designed to recognise the key technicians within the company. Of the Distinguished Engineers employed by ICL/Fujitsu, I believe that at least six worked on Horizon at any one time.
14. The Inquiry has asked me to provide an overview of my involvement with the design, testing, implementation and operation of the Horizon IT system. Horizon was a bespoke product designed by ICL/Fujitsu specifically for Post Office Ltd (“**POL**”). It was a huge, multi-layered processing system that acted as a conduit for data between POL branch counters (which initially relied on software called ‘Riposte’) and the various back office functions and third party agencies (which relied on software based on ‘Oracle’).
15. There were two main versions of Horizon. The original version, now called Legacy Horizon, was first piloted in 1996 and installed throughout POL branches between 1999 and 2002. The replacement version, Horizon Online (also referred to as HNG-X), was piloted in early 2010 and installed throughout POL branches during the middle of 2010. Legacy Horizon and Horizon Online were completely different systems as far as POL’s branches were concerned.
16. I hope it is helpful if I clarify that, as far as I can recall, during my employment by ICL/Fujitsu, there were six main departments within the POL account:

customer services, requirements, development, testing, program office and sales & commercial (this later became five teams when requirements merged with development). From around 1996 to around 2000, I was part of the agent team, which sat within the development department, along with other teams including architecture & design, host, counter, security and systems management. In around 2000, I moved to the architecture & design team within the development department, until its later merger with the requirements department, where I remained until I retired in 2015. Throughout all of this time, my involvement in relation to both Legacy Horizon and Horizon Online was technical and not managerial or supervisory in nature.

17. I never held or exercised line management responsibilities for other Fujitsu staff, whether within or outside the teams in which I worked. Within the POL account team in ICL/Fujitsu – which comprised hundreds of staff working on the many facets of the Horizon systems – I was never in a leadership role either managerially or technically. Throughout this time, there would always have been one or two people senior to me on the technical side (the Chief Architect and sometimes a Team Leader below them and above me). I recall that Dave Hollingsworth was the original Chief Architect, succeeded by Alan Ward, then Dick Long (although I think he had a different title), then Tony Drahota. After Tony Drahota left in around 2005, he was replaced by other Chief Architects whose main focus was on Horizon Online. I recall someone named Giacomo being in charge, but cannot remember his surname. From the early days of Legacy Horizon until shortly after the rollout of Horizon Online, I was one of a team of 10-20 architects working on the project, each with a specific focus on a particular component or process. This number reduced to three or four by the time I left. On the management side, I recall there were two or three gradually increasing levels of seniority between the Account Manager and me.
18. I started work on Legacy Horizon in 1996. My initial role was to try to integrate Riposte and the Oracle-based software. I formed a team that developed an “agent layer” that would allow these two types of software to communicate with each other. I continued as both the chief designer of this agent layer and as one of the technical interfaces to Escher (the designers of Riposte) until around

2002. During this time, extensive testing of Legacy Horizon took place. I supported ICL/Fujitsu's testing teams and assisted in identifying and resolving technical problems that they found.
19. Between about 2000 and 2002, I was involved – with teams of individuals at Fujitsu, POL and IBM – in specifying the interface between Riposte and the online banking engine provided by IBM, as well as enhancing the agent layer so that it could handle banking transactions. Shortly after the introduction of network banking (which went live around 2003), I performed a similar role to enable Legacy Horizon to interface to Streamline, the merchant acquirer that POL chose to support payments by debit card.
 20. Once these major systems went live, I moved away from the agent team and took on the role of defining the technical changes required by Project Impact, which was the name POL gave to the programme to replace their back-end accounting system. After Project Impact went live in around 2005, I worked on smaller changes to Legacy Horizon such as the implementation of bureau de change and the acceptance of credit cards.
 21. In about 2008, I commenced work with POL analysts in defining the technical requirements for Horizon Online. Horizon Online retained many of the back-end systems and interfaces from Legacy Horizon, but was otherwise an entirely new counter system, e.g. it removed all use of Riposte. I supported POL's requirements team in specifying "use cases" for the counter functionality (i.e. distinct functions that the software was required to perform, such as selling a stamp or making a withdrawal from a bank account), and then worked with the Fujitsu counter development team in implementing those use cases and testing Horizon Online.
 22. A further element to my role at this time was assisting in producing the mechanism by which a counter would transition from Legacy Horizon at the end of one business day to running Horizon Online the next. Once migration from Legacy Horizon to Horizon Online was well under way, I worked with POL on developing further enhancements to Horizon Online to support POL's

business requirements. I continued working on these matters until my retirement in 2015.

23. I was one of a group of anywhere between around 20 and 100 software designers and developers who would provide “fourth line” support for Legacy Horizon and Horizon Online, alongside their day-to-day roles developing new functionality. The first line of support comprised two helpdesks. SPMs could phone a helpdesk at POL for any business related issues, whereas for technical issues, they could phone a helpdesk at ICL/Fujitsu. The second line of support was an ICL/Fujitsu data centre (the Systems Management Centre, “**SMC**”) that received automatically generated reports concerning significant technical events affecting Horizon, e.g. server failure. The third line of support was the ICL/Fujitsu System Support Centre (“**SSC**”), which resolved operational problems and investigated potential software faults. If the SSC concluded that the problem was one that they could not resolve or it required a code fix, only then would they escalate it to fourth line support, which is where I worked.
24. The first three lines of support were staffed by dedicated employees whose sole role was to provide the relevant level of support. Fourth line support was different; for the software designers and developers who provided support at this level, this was only a small adjunct to their main day-to-day roles in producing new functionality for Legacy Horizon or Horizon Online. I estimate that my responsibilities in fourth line support comprised no more than 10% of my overall workload, although this varied over time.
25. As a general principle, at the time, I would only have been aware of those bugs, errors and defects specifically allocated to me by third line support, or where I was asked to route the issue to the correct person in fourth line support, or where I was asked for specific input on the problem because of my particular expertise. Over time, I was gradually allocated more bugs, errors and defects in my role in fourth line support. However, as noted above, there were about 20 to 100 software designers and developers working in fourth line support at any one time; all of them were allocated bugs, errors and defects depending

on their own experience with, and technical knowledge of, the component parts of the Horizon system architecture. The software designers and developers in fourth line support did not check or quality assure each other's work. I would not have been aware of many of the problems referred to, and addressed by, fourth line support.

26. In my role in fourth line support, my main functions (which varied in their intensity over time) were as follows. First, when third line support allocated a bug, error or defect to me, it appeared in ICL/Fujitsu's systems as a so-called PEAK (or before that as a so-called "PinICL"), which was a computerised report that allowed ICL/Fujitsu to review and track progress on fixing the problem. I was responsible for addressing and closing the PEAKs allocated to me (unless I re-allocated them to someone else). Secondly, on occasions, I assisted ICL/Fujitsu's Release Management Forum in explaining the nature and impact of certain bugs, errors and defects, as well as the corresponding fixes. Thirdly, when asked to, I joined conference calls with POL where I explained to them the nature and impact of certain bugs, errors and defects, as well as the corresponding fixes. I address these matters in more detail below.
27. This fourth line support infrastructure existed throughout my time working on Legacy Horizon and Horizon Online, both in their testing and operational phases. PinICLs and PEAKs were generated and allocated to specific fourth line software engineers to investigate and address. PinICLs and PEAKs generated during the testing phases were retained on the system once Legacy Horizon and Horizon Online went live. I understand that there was an archiving process for PinICLs and PEAKs but I was not involved in this process.
28. For the purposes of this statement, I thought it would assist if I addressed the evidence given to the Inquiry in writing and orally by David McDonnell that relates to me. I do not have a clear recollection of Mr McDonnell but I was able to watch his evidence and he looked familiar.
29. He is in error, in his witness statement, when he attributes to me the role of Chief Architect. At the time he describes (around 1998), the Chief Architect

was Alan Ward. As stated above, I have never been a chief architect in relation to Horizon.

30. It is also important that I make clear that, during the period he refers to, I did not have a direct role in relation to EPOSS. In his oral evidence, Mr McDonnell stated that in 1998 my responsibility was specifically for the EPOSS counter system. This is not correct. I had no responsibility for the EPOSS counter system (I was just responsible for the Agents). I do not recall that I had anything to do with EPOSS at that time. I had no responsibility for any concerns arising about EPOSS nor for responding to such concerns. I do not recall knowing anything about the formal concerns Mr McDonnell states were raised in relation to it.
31. In his oral evidence, Mr McDonnell expressed surprise that I was based at Bracknell. I assume that this is because he is under a misapprehension as to my role. I was based at Bracknell because that is where the Agent team was based. However, I probably visited Feltham a couple of times each week to meet with other senior designers.

RMF

32. RMF stands for Release Management Forum. I never held any formal position on the RMF and was not a regular attendee. However, I probably received emails about which issues they were discussing and outputs from the meetings. I do not know the period during which it operated. My understanding is that the RMF was an ICL/Fujitsu management forum that examined the severity of bugs, errors and defects within Legacy Horizon and Horizon Online, defined the work involved in producing fixes, and scheduled the release of fixes for those bugs, errors and defects (together with any new functionality) at regular intervals. I attended the RMF occasionally – either when I wanted to argue for a particular bug fix to be given a high priority in the scheduling of fixes being released, or alternatively when I was asked to attend by a member of the RMF in order to provide technical explanations of bugs, errors and defects, or to make recommendations as to the prioritisation of certain fixes.

Relationship between the Post Office and Fujitsu

33. As explained above, I believe that my involvement with POL technical staff commenced in around 2000. I always felt that our relationship was positive and productive. We worked collaboratively as a team without much regard to the distinction between "POL" and "Fujitsu." Information was shared between us as and when needed to resolve any particular issue we were working on together. If there were any political difficulties at more senior levels in the relationship between Fujitsu and POL, I had no direct knowledge of them and they did not seem to affect us.
34. I believe that my involvement with POL business staff commenced with Project Impact in around 2002. Project Impact began with a number of "requirements workshops", which POL organised in order to define the specifications of the changes that they wished to implement. I explain my involvement in Project Impact in further detail below.
35. As explained above, I also worked with POL technical and business staff during the design, testing and implementation of Horizon Online.
36. Alongside these development roles, I had a support role which I believe I took on once Project Impact went live in around 2005; this involved my talking to POL occasionally about the nature and impact of certain bugs, errors and defects, as well as the corresponding fixes.
37. The Inquiry is also aware that I had contact with individuals in POL in relation to prosecutions brought by POL. I have assumed that I am not being asked in this statement to explain this role given that it will be explored in phase 4 of the Inquiry.
38. My experience was that ICL/Fujitsu and POL (at least at the level I was working at) seemed to have a good and professional working relationship.

39. The Inquiry has asked me to describe the processes by which any “issues” were raised and shared between the teams, either by POL or ICL/Fujitsu. I am not entirely clear what is meant by “issues” in this context given the potential scope of that term and in the context of a very longstanding commercial and technical relationship. If the question is intended to be specific to how ICL/Fujitsu shared with POL information about bugs, errors and defects within Legacy Horizon or Horizon Online, my understanding is that the ICL/Fujitsu customer services team – in particular the so-called “problem managers” within this team – handled these matters. They would be alerted to problems by the SSC or (for operational issues) by the Ops team in Belfast. I was never a part of the customer service team. I had no understanding of their interfacing processes. I was one of a number of sources occasionally called upon to assist when the customer services team wanted technical explanations of the bugs, errors and defects, or where it wanted a software engineer to talk to POL about these bugs, errors and defects, and the corresponding fixes. However, I would not do any of these things of my own initiative. I would only talk to POL about these issues if ICL/Fujitsu’s customer services team specifically asked me to do so, or if POL contacted me directly. My understanding is that ICL/Fujitsu’s customer services team and POL also asked other software engineers to speak to POL about issues on which they had particular expertise.
40. My understanding is that POL had to sign off each new release of fixes and functionality for Legacy Horizon or Horizon Online. These releases occurred at regular intervals. If that understanding is correct, POL would have received details about the bugs, errors and defects that ICL/Fujitsu had identified and fixed.

The IMPACT Programme

41. The Inquiry has asked me to describe the background to the IMPACT programme, including its main business objectives. I do not recall the exact date when the changes proposed by Project Impact were first raised. However, my understanding is that it was an initiative generated by POL in around 2002. As far as I remember, the main business objective was to replace POL’s back-

end accounting system. I understood that this would have the effect of reducing POL's staff costs.

42. I do not know precisely how POL created the concepts and designs for Project Impact. I probably contributed some technical ideas that I thought would assist in implementing POL's objectives, but I was not involved in taking the final decisions about these concepts and designs. POL had a team that analysed the business and held a number of "requirements workshops" to define the specifications of the changes that they wished to implement. In order to understand what POL wanted and what the technical feasibility of implementing those changes was, I attended many of these workshops. Those workshops led to POL inviting bids from various suppliers for different parts of the project. I understood that Fujitsu bid for all parts of the project, but the only work it actually received concerned changes to Legacy Horizon that would enable it to interface with the new back-end system.
43. The Inquiry has asked me to explain the process that led to the decision to remove the ability of branch staff to post discrepancies to a suspense account and then roll into a new trading period. I believe that POL took this decision. I do not know who within POL was involved in the decision-making process or what factors they took into consideration. I do not know what tests POL carried out to determine the business effect of implementing this change. The relationship was not such that I could submit or dictate to POL what changes in functionality should be made; that was a business decision for POL to make. Rather, it was my job to understand what POL, as the customer, wanted and to work out how to achieve those objectives on a technical level.
44. The Inquiry has asked me whether there were any technical reasons relating to the changes to POL's back-end systems that prevented branch staff from posting discrepancies to a suspense account and then rolling into a new trading period. I do not recall any. POL took what I assume was a business decision that this practice should be stopped.

45. As explained above, I believe that ICL/Fujitsu was only involved in one aspect of Project Impact, which was implementing changes to Legacy Horizon that would enable it to interface with the new back-end system. This was implemented in two phases as part of the S60 release in 2004 and the S80 release in 2005. My involvement was to design the changes which POL wanted.
46. I remember that these phases of the work required a major re-engineering of the accounting processes in each POL branch, e.g. removing the cash account and introducing the branch trading statement.

PEAKs and PinICLs

47. The Inquiry has asked me whether the PEAK and PinICL systems as designed were effective. In my opinion, they were effective, because they allowed ICL/Fujitsu to understand, prioritise, monitor and remedy bugs, errors and defects in a timely fashion. However, it is difficult to state definitively that a system is “effective” when that system necessarily relies on humans inputting and processing the information in it. Used properly, I believed that it was a good tool, but only as good as the users handling it. I cannot account for the effectiveness of every PinICL and PEAK. I should also point out that I cannot compare it to any other system because I have not worked with any other system over the past 25 years. I have no point of comparison to offer the Inquiry.
48. The Inquiry has asked me what pressures there were to resolve or close issues, or attribute them to user error. I recall that there were periods where ICL/Fujitsu management would consider the statistics on open PinICLs and PEAKs, and would encourage us to spend more time investigating and closing those that could be closed. However, as far as I am aware, we only closed PEAKs if satisfied that we had investigated the problem. I do not recall any examples where I was involved in closing PEAKs without investigation and simply attributing the underlying problem to user error.

Reflections

49. The Inquiry has asked me whether I think I could have done anything differently, and whether Fujitsu or POL could have done anything differently. In the context of the questions I have addressed in this statement, I cannot think of anything that I could have done differently, but I am happy to respond to specific suggestions.
50. Again, in the context of the questions I have addressed in this statement, I cannot think what Fujitsu could have done differently, but I am happy to respond to specific suggestions.
51. In relation to what POL could have done differently, it is difficult for me to comment because I have little direct knowledge of exactly what they did and why. However, my impression is that POL did not provide enough support to SPMs when they were struggling to use Legacy Horizon and Horizon Online. Instead of investigating the issues that the SPMs reported (and trying to assist them), my impression is that POL blamed them instead.
52. The Inquiry has asked me who was to blame for the problems that have arisen from the Horizon IT project. Again, it is difficult for me to comment because I do not have the full picture in front of me and I am not sure that there is an easy answer to this question. The demands on the Legacy Horizon and Horizon Online systems (in terms of what they had to deliver) were substantial. Their scale was significant. They were not perfect computer systems. No computer system is perfect. However, I believed at the time – and I still believe now – that ICL/Fujitsu did a good job in investigating and fixing bugs, errors and defects.
53. Finally, the Inquiry has asked me whether there is anything I would wish to add to assist the Chair. In the context of this witness statement and the questions which I have answered, I do not think that there is more that I can say which would be of assistance. I would like to say however that I was shocked to read

the judgments that quashed the wrongful convictions of the SPMs. As I have stated at the outset of this statement, at this time, and pending the ability of my lawyers to advise me, I will revisit the question of whether I will rely upon the privilege against self-incrimination related to those matters connected to POL's prosecution of SPMs.

Statement of Truth

I believe the content of this statement to be true.

Signed:

GRO

Dated:

06/02/2023