

Witness Name: Geoffrey Ian Butts
Statement No.: WITN03860100_01
Exhibits: WITN03860100_01/1 –
WITN03860100_01/35
Dated: 27 January 2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF *GEOFFREY IAN BUTTS*

I, *GEOFFREY IAN BUTTS*, will say as follows:

INTRODUCTION

1. I joined Fujitsu in July 2005 as an IT Programme Manager and had various roles in Fujitsu over the 10-year period which I spent working for the company, leaving in June 2015.
2. This witness statement is made to assist the Post Office Horizon IT Inquiry (the 'Inquiry') with the matters set out in the Rule 9 Request dated 17 November 2022 (the 'Request'), to the extent that I have or had direct knowledge of these matters. The topics set out in the Request focus on the pilot and acceptance of Horizon Next Generation ('HNG-X'), as well as migration of Post Office branches

to the new system. I have also been asked to discuss concerns raised by end users (i.e. Sub-Postmasters) and the quality of any guidance or training provided to Sub-Postmasters following the implementation of HNG-X.

3. Throughout this statement, I refer to documents that have been brought to my attention by the Inquiry. These documents are referred to using references WITN03860100_01/1 – WITN03860100_01/35 and are listed in the index accompanying this statement.

BACKGROUND

4. I have listed my various roles in Fujitsu below:
 - a. **July 2005 – November 2007 – Deployment Programme Manager, South Central Strategic Health Authority.** I was responsible for the build, test and deployment of the Cerner Millennium Care Records System ('CRS') and interfaces to 3rd party systems into the NHS South Central Strategic Health Authority, which was one of the Strategic Health Authorities in the Southern Cluster of the NHS. Fujitsu partnered with the Cerner Software company to build, test and deploy the Cerner Millennium system to all the NHS Trusts in the Southern Cluster. I was one of several Deployment Programme Managers (there was one allocated to deliver the Cerner system to each of the Strategic Health Authorities in the Southern Cluster). I managed 10 deployment projects, with a budget of £30m, leading a multi-disciplinary team of over 100 staff. CRS projects were implemented in 2007 to over 5,000 users in

Winchester, Milton Keynes and High Wycombe Hospitals. This required complex stakeholder management with senior staff up to CEO level in NHS Trusts, Strategic Health Authorities, Connecting for Health (the central NHS body managing the programme) and Primary Care Trusts.

- b. **November 2007 to July 2008 Head of Service Change and Release, NHS Account.** I led the team which released software across build, test and live environments for the CRS, Choose and Book, and PACS/RIS Domains in the Southern Cluster. This included:
- i. The planning, scheduling and implementation of all software installation and build configuration changes for “greenfield” Go Lives, software releases and upgrades, and emergency fixes across environments for 40 deployment projects.
 - ii. Line management of 3 teams with a total of 90 staff, with full Profit and Loss ('P and L') responsibility. I led an improvement programme in conjunction with the third party software supplier to improve technical tools for moving configuration and application code resulting in ten-fold increases in copying speed. The role came to an end when the programme was terminated by the NHS and Fujitsu staff were re-allocated into other parts of the business or released.
- c. **July 2008 to March 2009 – Customer Services – Head of Live Service for Global Service Desk Application, Customer Services.** I led the implementation and operation of the CA Unicentre Service Desk

application and processes across Fujitsu accounts worldwide. Accounts included Royal Mail, Reuters, Electrolux, British American Tobacco and the Financial Services Authority (as it then was) running on a shared live service, with Desks based in UK, Lisbon, Costa Rica and Kuala Lumpur. This was an internally facing role. I was offered this role when the Fujitsu NHS Account was disbanded following the termination of the contract by the NHS. After 8 months, I asked for another customer facing role.

- d. **March 2009 to September 2010 – Delivery Programme Manager, Post Office Account.** I was asked to join the Programme team responsible for the development, testing and rollout of the HNG-X application across 11,400 Post Office branches. My role was focused on the testing and subsequent deployment of the branch router devices to every Post Office branch in the UK and the subsequent implementation of the HNG-X software to each of the branches. I left the Post Office account when the deployment of the application across the branch estate was nearing completion. The programme had been running for some time when I joined and was already significantly delayed.
- e. **October 2010 to November 2011 – Deputy Programme Director (to January 2011), then Global Programme Director, Shell Account (until November 2011).** I led a programme which deployed 3 regional IT Service Desks (in Canada, Poland, and Malaysia), engineering services and point of sale applications and back-office infrastructure to over 3,000 fuel retail outlets in 15 countries. The project also included

successfully transitioning the legacy UK service operation for 600 Shell fuel retail sites into Fujitsu support on schedule in April 2011.

- f. **November 2011 to April 2013 – Programme Delivery Director, Astellas Account.** Astellas is a global pharmaceuticals company. I was responsible for the delivery of a portfolio of IT projects to the European part of the Astellas organisation using Fujitsu delivery teams in the UK and Germany, including datacentre infrastructure upgrades, and an MS-exchange 2010 migration of 6,000 mailboxes across 27 countries.
- g. **May 2013 – April 2014 – Delivery Executive, Astellas (and Gatwick Airport/Xchanging from July 2013).** Fujitsu introduced a new role across its Account Portfolio – the Delivery Executive, which worked alongside the Client Director on each major account. The responsibility of this role was to oversee all large projects and IT Services ensuring successful delivery to meet agreed revenue and profit targets (with P and L responsibility), and to increase customer satisfaction with the services provided. Having spent over 14 years in project and programme management at this point, I decided that it would be a good career move to gain experience in a wider role which brought service management and project management together. I applied for the role on the Astellas Account and was successful. The project and services contract was a first generation datacentre and IT Services outsourcing across 27 countries in Europe. The datacentre was run from Germany, and the multi-lingual Service Desk was run from Lisbon, supporting over 4,500 users. I managed a team of 140 across the UK, Germany, Portugal

and Netherlands. I was also responsible for maintaining good customer relations with senior stakeholders up to and including the European Chief Information Office.

In February 2014, Astellas awarded a wider Global IT Outsourcing Contract to IBM which replaced the legacy European contract. As a result, Fujitsu entered an exit process for the services which I had been managing. I handed over to a Fujitsu Exit Manager to take up a new role on the UK Border Force Account.

h. **April 2014 to June 2015 – Delivery Executive, Home Office (Border Force).** I was responsible for the leadership and management of Project, Service and Development teams supporting a level 5 national critical infrastructure application. Our team was part of a large project which successfully transitioned the above application into modern, resilient datacentres by October 2014. I led a major service improvement programme which completed in February 2015.

5. I left Fujitsu in June 2015 after being headhunted to join Computacenter as a Service Director. I was promoted to lead the UK Transition team in May 2019 and remain in that role to date.

6. My Qualifications are listed below:

- a. 2015: IACCM Fundamentals of Contract and Commercial Management;
- b. 2008: Certificate in Coaching from Henley Management College;
- c. 2008: National (APMG) Practitioner in Programme Management;

- d. 1999: Ph.D. in Biophysics – Institute of Cancer Research, University of London (4 years full-time, 11 years writing up in my own time); and
 - e. 1984: B.Sc. (Honours), Upper Second in Physiology, University of Leeds.
7. The qualifications set out at paragraphs 6(a) to (c) above, also reflect external training I received for my roles at Fujitsu.

MIGRATION TO AN ONLINE VERSION OF THE HORIZON IT SYSTEM

8. In order to prepare this section of my statement, I have been asked by the Inquiry to consider documents WITN03860100_01/1 to WITN03860100_01/8.
9. When I joined the account in March 2009, the Programme Manager role I was initially given was to oversee the datacentre migration to the new infrastructure to run the new version of Horizon, HNG-X. This entailed running a small team of Project Managers who were working with a number of technical staff to create very detailed plans for the step-by-step technical migration process which had to be validated and walked through many times. The process was to migrate the legacy software onto the new hardware platform, before the new version of the software would be implemented. It was not long after I joined the programme that a new overall Programme Director, Alan D'Alvarez was brought in. Mr D'Alvarez became my line manager and I reported to him directly. Mr D'Alvarez re-organised the team, and my role was changed to be responsible for the rollout of the HNG-X application to the 11,400 branches. Vince Cochrane led the datacentre migration element.

10. I was not made aware of legacy software issues when I joined the project. Neither was I aware of issues that Sub-Postmasters had been highlighting with the live service when I joined the project. All the major issues that were flagged in the testing of the HNG-X application, and that were identified in the different stages of the pilot migrations, were resolved before the main rollout, in agreement with the Post Office project team.

Lines of Support

11. I have been asked to comment on the contents of an “Operational Level Agreement for 4th line support of HNGX” dating from 14 January 2010 (WITN03860100_01/3). In particular, Application Support in terms of Software fixes to the Business Capabilities and Support Facilities and using appropriately trained operation staff.

12. This document is a description of fourth line support services. Application Support here means using the most experienced and capable technical staff who are called in to diagnose and propose fixes for any incidents that occur in the business (either in Post Office branches or in the back end of the Post Office operations) that cannot be resolved by the first to third line support teams. Individuals at this level may have designed the original application and/or written much of the code. This may also entail experts from supporting third parties (e.g. Oracle). Any fixes would be developed with the Application Development Team in Fujitsu.

13. In relation to the expertise of the those working in fourth line support, I would expect the staff operating in this area to be highly trained as application developers and software designers, with formal accreditation from an industry recognised body. I was not aware of the exact formal training and accreditation process used within the Fujitsu Applications Development team but I'm sure there would have been one in place given the complexity of the software. The Solution Architecture and Application Development and Design teams for HNG-X were in place long before I joined the project. I was not asked to assure myself as to their technical competence and did not expect to. There were Solution Architecture and Application Development team owners who would have been tasked with ensuring that appropriately skilled resources were used to fill the required roles.

14. In terms of training, I do not know who the named individual was who was responsible for training across the Applications Development team within Fujitsu. The Applications Business had teams across multiple sectors, and there would have been some degree of standardisation across the teams – with, for example, different levels of software developers.

15. With regards to the remaining lines of support, support staff are categorised in terms of lines of support and can be described as follows:

- a. **First Line Support:** This was the point of initial contact between an end user (in this case Sub-Postmasters) and the IT Service Desk that took initial feedback about the issue raised, analysed it against a knowledge

base of known issues and, where possible, offered simple ways of fixing the issue there and then. If it was not possible to fix the issue quickly (i.e. directly and in the space of a few minutes, then the first line would escalate to the second line support team. First line support agents were typically staff who initially picked up a user incident (either by phone or on-line). They were not trained as software developers.

- b. **Second Line Support:** A team with more technical knowhow than the first line support team who could undertake more in-depth troubleshooting. They were not trained as application developers so would not understand the application software code, but they did know its functions and understand the IT environment in which it operated, for example, any local end user device constraints. They were able to fix more complex issues than the first line team.
- c. **Third Line Support:** The staff in this team would have been the application developers who understood the code of the supported application and were able to troubleshoot and diagnose issues with the software. They could also propose, develop and implement software fixes (subject to following an approved change control process) to resolve issues.
- d. **Fourth Line Support:** These were the most senior developers/designers with the greatest understanding of the application end to end and who may have designed the application. They were called in to resolve major incidents which the third line team either could not resolve or were taking a long time to resolve.

16. My understanding is that the term 'Known Software Incidents' in the context of WITN03860100_01/3 is simply referring to any software incidents which are reported.

17. I would expect there to have been logs of all reported incidents from Post Office branches after they went live on HNG-X, each of which would be assessed and categorised according to business impact. Many of these would not necessarily require software fixes. All incidents raised via the Service Desk were formally logged and tracked. During the testing of the application, there was detailed reporting of defects found (using the Test reporting tool), which would have included issues requiring software fixes. Again, these defects will have been impact assessed for severity based on the business impact and prioritised with actions identified to resolve. Not all defects necessarily required software fixes. Prior to any Post Office branch going live on HNG-X, there were acceptance criteria agreed between Fujitsu and the Post Office project team on the testing threshold that had to be achieved, e.g. no open critical defects.

HNG-X Migration Incident

18. I have been asked to recall an incident referred to in an email chain dating from 19 February 2010 to which I am copied (WITN03860100_01/8). This incident occurred during the implementation of HNG-X to the next tranche of pilot sites. I recall that the Medium Volume Pilot scheduled around 20-30 Post Office branches per night (Mondays – Fridays) to be migrated over a 1-month period. The technical team had noticed that there was an issue with one of the Post Offices migrated the night before and made an operational change to correct it, not realising there would be a knock-on impact on the next day's planned

migrations. It was frustrating for all concerned that none of the migrations planned for 1 particular day worked – given that trainers were on site at the branches and the branches had taken on additional staff to assist.

19. The previous night, 21 out of 22 branches had migrated successfully and the reason for the single failure was, as stated in the email, diagnosed and communicated to the Post Office. However, this failure of migrations happened quite early in the start of the Medium Volume Pilot implementation. At this point, the programme had suffered from long delays and Post Office was desperate for some good news to demonstrate progress to the end user community, hence the frustration from senior stakeholders at the Post Office like Mike Young.

20. I recall that additional communications were issued to the technical teams monitoring the migrations requesting them not to implement operational fixes for individual branches during migrations. I cannot remember exactly how quickly the failed branch migrations were rescheduled, but they would have been rescheduled within a matter of working days if possible.

High and Low Level Design Documentation

21. The Inquiry has referred me to the Low Level Design documents for the HNG-X Support Network dating from 1 August 2010 and in which I am described as having optional review (WITN03860100_01/7). A Low Level Design is created after the High Level Design has been written. The High Level Design gives the overall relationship between the various elements of the system to be

implemented and their function. It will include elements such as high-level connectivity between regions and physical locations. The Low Level Design provides far more granular detail on what is to be implemented, effectively describing the full technical solution. It will include, for example, details of the VLAN, network port numbering, and configuration settings. This document is targeted at technical designers, implementers, and support engineers. As programme manager, I did not have a role in designing the system (the solution architecture and the application software for HNG-X) and did not therefore input into this document.

HNG-X Solution Architecture

22. The Inquiry has pointed me to an HNG-X Solution Architecture Outline dated 2 August 2010 (WITN03860100_01/1), where my role is described as “HNG-X Programme Manager” and I am said to have approval authority. The Inquiry has asked what this involved.

23. By way of background. I was the lead for the rollout of the branch router devices and the HNG-X Software to the branches. Document WITN03860100_01/1 formalised the Solution Architecture underpinning the system. It is dated 2 August 2010, when the rollout of the HNG-X solution across the branch network was almost complete. The document had to be reviewed and approved by the mandated technical reviewers in order for me to sign-off on it.

24. By the time this document version was created, the project team had been through a long period of development, testing and a protracted pilot before the full deployment gathered momentum during the middle part of 2010. The Development team had fixed a very large number of issues both prior to the pilot and during the pilot, working closely with the Post Office team. This included working with Oracle to resolve an issue in version 10 (I cannot remember the precise Oracle version number – it might have been v10.1a) of the Oracle database management system which delayed the start of the full rollout by a period of around 3 months. There was a sense of relief and satisfaction by this stage from all sides that the project was visibly progressing. Any progress from the low volume pilot to the medium pilot to the full deployment was undertaken in a very transparent and collaborative manner between Fujitsu and the Post Office teams. I did not have concerns about the solution architecture, trusting that the appropriate technically skilled people were involved in designing and building it, with governed approvals, and I had confidence in the application development and support teams.

HNG-X Migration Strategy

25. The Inquiry has asked me to consider document WITN03860100_01/2, which is the “HNG-X Migration Strategy – Agreed Assumptions and Constraints” dating from 19 November 2010. For version 1.3 of this document, I am listed as the author. This relates to when I initially joined the programme – when my role was to lead the datacentre migration. This document had long been in existence and was continually being updated. I inherited it and oversaw changes from a number of individuals. When my role changed to be the

Programme Manager for the deployment of the HNG-X software to the branches, Gareth Jenkins was deemed to be a more appropriate owner because he was the senior technical lead on the programme.

26. I have been asked by the Inquiry to comment on the "POA Customer Service Major Incident Process" dating from 25 August 2010 WITN03860100_01/5. This document was updated during the period of the full-scale rollout of HNG-X across the branch estate. As the Deployment Programme Manager, it was essential for me and other members of the management team to be made aware of any major incident as quickly as possible. It is for this reason that section 10.8 of this document requires the Head of Service Ops to inform me (amongst others) within 10 minutes of the service incidents. During the full rollout, there were several hundred branches scheduled to migrate every week and therefore decisions had to be made quickly as to whether or not to halt migrations if there was a major incident. The deployment, service and support teams had to work in a joined up way.

27. My role in a major incident situation was to ensure that the deployment team was aware of any major incident and to assess the impact of a major incident on the forward schedule for branch migrations, initiating replanning of the branch migration schedule if necessary, and to ensure that the right technical teams were brought to bear to resolve the major incident, working closely with the service management team. If branch migrations were impacted, I had to communicate this with my customer opposite number in the Post Office, Will Russell, and Mark Burley, his boss.

PILOT SCHEME FOR HNG-X

28. In order to prepare this section of my statement, the Inquiry has asked me to consider documents the following documents, in relation to which I have been asked a number of discrete questions: WITN03860100_01/9 to WITN03860100_01/17. I address these documents in turn below.

HNG-X Migration RAG Report

29. The first document which the Inquiry has asked me to consider is a spreadsheet entitled "HNG-X Migration RAG Report" (WITN03860100_01/14). This spreadsheet relates to issues raised and owned by me and contains 3 sets of issues:

- a. Issues that by agreement had to be fixed in the migrated HNG-X Post Office estate;
- b. Issues that had to be resolved before the next stage of rollout could commence; and
- c. HNG-X - Live branch issues.

30. This spreadsheet was used by the programme team to track issues and their management to closure during the pilot. This was shared and reviewed with the Post Office Programme Team so that there was an open view of what was being done.

31. Taking each part in turn:

a. Reference number HVP8 –

Release R01.08 (Approach is to start HVP with 0107 code & in parallel pilot R.01.08 in 50 MVP branches - missed opportunity to pilot if delayed)

This was a concern that, if the timetable for deployment of the next release of the branch software (R.01.08) was delayed, it could not be included in the pilot. The timetable is described in the history and latest position. I cannot remember what the actual dates for the deployment of R.01.08 were.

b. K1 and K2 – These related to timeouts or screen freezes which effectively stopped end users from using the application in the migrated pilot branches.

c. K3 – This related to the number of interventions required by the Service Desk or the Network team. K1, K2 and K3 issues were tracked on a daily basis because of the impact on the branches.

d. K 5.1 – Related to a procedure not being followed at 2 branches, which resulted in an action to a) check that there was not a data integrity issue and b) reinforce the correct procedures to be followed at the branch.

e. K6 – Related to the time taken for on-site engineers to fix a hardware failure issue which was logged by the branch following migration. This was raised for a specific branch in Clapham. In this particular case, the engineer arrived on site within contractually agreed timeframe but was

asked to swap the kit out of hours by the local Postmaster which meant that Fujitsu had to rearrange the site visit 4 days later.

- f. K13 – There was a concern raised about the ability of support teams to support the branch estate (in terms of capacity). This was constantly kept under review during the pilot and rollout. Many people worked overtime and weekends to support the pilot and rollout over a long period of time.

- g. R02 – This was a request from Post Office to Fujitsu to increase the number of branches which were migrated overnight on a Friday evening. The rollout schedule was planned so that most branch migrations each week happened on a Monday, Tuesday, Wednesday or Thursday evening. With all the delays to the application development there was huge pressure from Post Office to make the deployment rollout to the branches as rapid as possible. This had to be balanced against the bandwidth limitations of the network connections to the branches and the speed of download of the software to enable the branches to complete their testing as quickly as possible the next day. Fujitsu did look into ways of increasing the number of deployments which could happen each day through tuning the download process (including Fridays), but I cannot remember the details of what these improvements were.

32. The whole team was concerned about the timeouts and screen freezes because this clearly would impact on the usability of the application. There was a huge focus on addressing these issues in order for the higher volume pilots to proceed. There were challenges for the programme team in getting enough information from the branches during the pilot to diagnose the issues (many were very good at reporting issues but others were not), and to separate issues affecting one branch from those which affected multiple sites, if the reporting from branches was inconsistent.

EMV Banking and Retail – Horizon – LINK Mapping

33. I have been asked to comment on a document entitled “EMV Banking and Retail – Horizon – LINK Mapping” dated 30 April 2010 (WITN03860100_01/9) and the reasons for the changes made between version 3.2 and version 4.0. This is a Post Office document where I am listed as having been issued the document for information or as optional review. I assume that the document was subject to regular review and that a number of updates were required to it based on the implementation of the HNG-X application to the pilot sites which needed to be agreed before the full rollout to the branches started. I was not involved in writing it or reviewing it.

34. The associated documents referred to on page 5 of WITN03860100_01/9 relate to Vocalink, which is a company that provides transaction switching, clearing and settlement for the UK LINK Scheme which was implemented for Post Office. So, it was essential that data from HMGX was mapped in accordance with the Vocalink standards and with Post Office standards.

Vocalink – HNG-X Technical Interface Specification

35. The Inquiry has then referred me to a document entitled “EMV Banking and Retail: NBS – LINK Application Interface Specification” dated 5 May 2010 (WITN03860100_01/10). I have been asked to explain the ‘Vocalink – HNG-X Technical Interface Specification’ referenced at section 1.7 on Page 7 of the document. From the title, this appears to be the detailed description of the interface between HNG-X and the Vocalink system for clearing and settling financial transactions which would have enabled data to be exchanged between the two systems.

HNG-X Branch Exception Handling Strategy – Agreed Assumptions and Constraints

36. I have been asked to comment on the “HNG-X Branch Exception Handling Strategy – Agreed Assumptions and Constraints” document dated 18 November 2010 (WITN03860100_01/11) and whether I had any concerns in relation to its content. I do not recall having any concerns regarding the contents of this document at the time. The only substantive change was the addition of Section 8. On reflection, when looking at this document 13 years later, perhaps the changes in Section 8 should have been integrated into the existing sections of the document. More explanation of how this document fits in the overall contract schedules and how it is to be used would perhaps be useful.

37. I have also been asked to explain the aims of this document and its conclusion. I believe this document explains key areas of exception handling at local branches in the event of different types of component failure with the solution.

This includes network failures, local hardware failures and central infrastructure/application failures in HNG-X to inform discussions between Post Office and Fujitsu in interpreting Service Level Agreement performance in the service contract. The document includes tables comparing the expected average faults per counter per year for different types of failure, and compares the expected failure rates between the legacy Horizon application and HNG-X. It is worth noting that some elements of the branch hardware dated back to the original Horizon rollout. The new HNG-X application was designed to run on this local branch hardware, which had a reputation for being reliable but was in IT terms quite old. The age of the branch hardware was well known and understood by Post Office and Fujitsu and the software was written to be efficient so that it would run at an adequate speed on this local hardware. I do not recall having any other concerns about the document.

RAG Report Communications

38. The Inquiry have also pointed me to two email chains dating from 2010 to which I am a party (WITN03860100_01/12 and WITN03860100_01/17) and asked if these documents relate to the RAG Report described above in this statement. The issues being discussed in these documents relate to the deployment of the HNG-X software to Post Office branches. There were 4 packages for software which had to be downloaded to the branch and then unpacked and installed on to the branch servers. If the order of the package download and deployment was changed from 1, 2, 3, 4, this could affect certain types of branch counters meaning they used incorrect reference data from the Rate Boards. These issues would have been raised on the RAG report.

39. In this instance, I wanted to wait before communicating this information to Post Office, so that we could check if there was a workaround that could be applied without another software change which could impact on the deployment rollout schedule. I also wanted to confirm the timelines for the software fix and understand the risks to the schedule and any support concerns with my peers, including the leader of the Application Development team (Graham Allen) before we spoke to the customer. Post Office always wanted options for issues, not simply announcements of risks and/or delays. We were speaking with the Post Office team every day, and this matter was discussed with them.

Migration Reports

40. My role in the migration was the Deployment Programme Manager, overseeing the rollout of the branch router and HNG-X software to the Post Office branches.

41. The purpose of migration reports was to ensure the right focus was brought to bear on the key issues arising from the branch migration. The document exhibited at WITN03860100_01/15 is the latest summary of defects in the Fujitsu Test application.

42. The Inquiry has asked me to address the reasoning and process by which I would raise issues and what my involvement was in relation to the management of those issues. I would raise issues by reviewing the statistics from the daily rollouts, and receiving feedback based on incidents raised either directly with

the implementation team or from incidents raised by Post Office staff on the Service Desk. Such issues as above would be tracked through the different tabs in the RAG spreadsheet (a further example of which is exhibited at WITN03860100_01/16) from cause of delays to issues encountered, with and “owner” assigned to resolve the issue, a categorisation as to whether or not the issue needed to be resolved for the rollout, and where the issue was located, e.g. in the branches or centrally.

43. I was leading the management and resolution of the issues arising from Release 1 deployment, ensuring that the right priority and focus was brought to fixing issues whilst trying to maintain where possible successful deployment rates for the rollout.

DECISION TO ACCEPT AND ROLLOUT HORIZON ONLINE

44. To assist my preparation of this section of my statement, the Inquiry has pointed me to the following documents: WITN03860100_01/09, WITN03860100_01/11 and WITN03860100_01/18 to WITN03860100_01/30. The Inquiry has then asked me to consider a series of discrete questions in respect of these documents. I address these questions in turn below.

45. The Inquiry also asked whether I know what the Saving Gateway account was, but I do not.

Software Issues in the HNG-X Pilot

46. The main software issue that I recall being identified as one of the reasons for aborting the roll out of Horizon online at several branches was the screen freezing/performance issues at pilot branches. This was eventually diagnosed as an issue with the Oracle version 10 relational database management system, which required top level technicians (fourth line) from the U.S. in Oracle's development team to identify and develop an emergency fix for. It took over 3 months for this issue to be resolved, during which time the pilot was halted. Whilst the fix was being developed, Fujitsu had to implement a number of interim manual technical support processes to monitor and prevent the working memory used by the database being used up.

47. During the early pilot, all issues found were raised in the RAG Report described above and exhibited at WITN03860100_01/14. As the pilot progressed to larger numbers, the incident management process was used to track these, although a summary of the critical issues was manually produced and reviewed on a daily basis.

48. In this regard, the Inquiry has asked me to consider two documents:

- a. The Service Description for the Central Network Service dated 21 January 2010 (WITN03860100_01/20): I do not recall having reviewed this document but I'm sure I would have read it and had the opportunity to give feedback on it. The timing of this version suggests it was the last version before the start of the rollout. I cannot remember if later versions

were produced but I would have expected this to be at least reviewed and if necessary updated after the completion of the rollout.

- b. The Service Description for the Branch Network Service dated 4 March 2010 (WITN03860100_01/21): I reviewed but did not write this document. The goal in deploying the HNG-X software was to do this with minimal business impact on day-to-day operations. I was not involved in the Service management led discussions around operational service performance during the rollout. It was recognised that at the point of migration of branches to the new software platform there would have to be some downtime but once the new application was running, the intent was to have no further downtime once the migration had completed.

EMV Banking and Retail

49. I have been referred to two documents which relate EMV Link Mapping and EMV Banking and Retail (WITN03860100_01/9 and WITN03860100_01/22, respectively). I do not recall these documents. From the history – it looks as though they were subject to detailed feedback from Post Office prior to sign-off.

Application Interface Specification: Horizon to e-pay

50. I have been referred to the Application Interface Specification for Horizon to e-pay dated 24 August 2010 (WITN03860100_01/25) and asked whether changes made to the document resulted from errors or bugs. I did not review this document formally, although I would have read it. The document version histories are, however, detailed and indicate that this was updated to reflect changes made for HNG-X, not as a result of errors or bugs.

Service Desk Service Descriptions

51. Document WITN03860100_01/27 is the Service Desk Service Description dated 16 September 2010, which was originally designed for the original Horizon application service. It is a description of the Fujitsu Service Desk Service provided to Post Office. During all the pilots, there were additional support arrangements to the standard Service Desk arrangements in place to ensure that the issues were identified, triaged and resolved as quickly as possible.

52. I played no role in designing this system or in updating this document, which represented an update for the new HNG-X application. A detailed incident management system is standard good practice for major business applications and systems. It is important that the customer and IT service provider understand those processes so that escalations and governance are clear, and that incidents can be reported on in a consistent and timely manner. By the time I left the account, the lessons learned from the pilot stages and from the large-scale migration of branches to the new application would have been used to inform more changes into this document. I worked very closely with the Fujitsu Service Management team (including Graham Welsh, Gaetan Van Achte and others) to ensure that there was a controlled transition into business as usual operations as the migrations progressed.

53. The Inquiry has also provided me with the Service Desk Service Description dating from 20 August 2010 (WITN03860100_01/30). During the pilot and rollout of HNG-X, Fujitsu had considerable extra provision for incident

management because the programme team was in place, working with and supporting the service management teams, above and beyond what is documented in this document. This was because the programme was not in “business as usual mode” until the rollout was completed. I cannot recall these extra support measures in detail but I am reasonably confident that, for the pilot migrations and the early stages of the mass rollout, the Development and other technical teams (including the networking team) were working additional hours to be available for the rapid triage and resolution of issues. The steps to be followed in the normal operational world are described in detail in the document.

54. The Service Desk process was updated for HNGX but not re-written from scratch. As with the subsequent version of this Service Description, I was not involved in designing the system. I do not know what was changed in the document for HNG-X.

CONCERNS RAISED BY END USERS

55. I have been asked to refer to the documents exhibited at WITN03860100_01/31 (an email dated 9 June 2010 with subject line “All Open Calls excluding calls of Type R (Release Notes)” to which I am not a party) and WITN03860100_01/32 (a spreadsheet matching that description) and explain some of the contents of the documents.

56. A level 2 Manager was the person owning that part of the HNG-X programme.

For example, Debbie Richardson was the senior Test Manager on HNG-X, I was the deployment rollout lead.

57. Part of my role as the Deployment Programme Manager was to review any calls that were raised after that they had been triaged to be in my responsible area, and ensure that actions were taken to get to the root cause and either resolve them or take preventive measure to stop them from happening again.

58. Calls relate to incidents which have been raised (by end users at the branches) and which have not been diagnosed or resolved. I do not remember what Type R Calls were or why they were excluded. The calls list is an extract from the incident management system.

59. The information in the above documents was used to get an overview of the number of open/closed incidents across different functional areas for management purposes. Each open call was detailed. The Level 2 managers were responsible for managing these numbers, the aim being to resolve as many issues as safely and quickly as possible.

60. The process was that each functional area owned their own open calls and managed their teams to resolve them, often in collaboration with other supporting teams. The number of open and closed calls was tracked on a regular basis (from memory at least weekly).

61. Sub-postmasters reported issues to the HSH/NBSC during the pilot phases, which concerned me and the programme very much because it meant that there was business disruption.
62. There was one particular stage of the pilot, although I cannot remember how many branches had been migrated to the new application (it might have been around 30), where we made a decision jointly with the Post Office management team, that rollout of the software to more branches would have to be delayed until the root cause of screen freezes was identified and a fix found. This proved very difficult to diagnose, and required fourth line Oracle support from the U.S. following senior Fujitsu executive escalation. The root cause was an issue in the buffer memory management of the Oracle version that was in use to manage the HNG-X database. It required Oracle to fast track a fix which took time to develop, test and implement. During the period whilst the deployment was on hold (around 3 months), Fujitsu had to put in place a series of manual checks and additional support processes to support the branches running HNG-X if they suffered screen freezes.
63. A small number of branch migrations failed because branches failed to follow the pre-requisite preparation instructions prior to their migration, e.g. not leaving devices on. There were also some occasional failures of equipment as a result of the migration, and sometimes the branch router devices failed when engineers tried to install them, which meant that the installation had to be re-planned. I have previously mentioned the bug whereby, if the software packages were not downloaded in the correct order, the rate boards on certain

types of counters used incorrect data. This was fixed by the application development team by changing the delivery instructions for the software to branches.

64. As noted above, Will Russell was my counterpart at Post office during this time, and also Mark Burley, who was Mr Russell's boss.

QUALITY OF GUIDANCE OR TRAINING GIVEN TO END USERS (e.g. SPMs)
FOLLOWING THE IMPLEMENTATION OF HORIZON ONLINE

65. I was responsible for the rollout of the branch router and the deployment of the software, not the end user training.

66. I have been provided with URNs WITN03860100_01/33 to WITN03860100_01/35, which include

- a. an installation guide for on-site engineers installing a Rate Board; and
- b. a Rate Board maintenance guide for on-site engineers in case of issues.

67. As an 'optional reviewer', I was sent these documents for information only. I do not remember formally reviewing the documents, but I do remember reading them out of interest.

68. In terms of 'hands-on' training, I understand there were model office setups in Fujitsu where engineers were taken through installation and maintenance of

different items of Post Office branch hardware. New engineers might also shadow experienced engineers on site visits.

69. I did not receive feedback from engineers directly, although members of my team did. Unfortunately, this was not helpful because often the nature of this feedback was emotive and highly anecdotal in nature, and because it was not formally logged through the Service Desk it was very difficult to troubleshoot and diagnose the root cause after the event. Fujitsu had to reiterate to the Post Office management team on a number of occasions that the Post Office branches had to follow the correct process to help get to an issue root cause and resolution quickly. However, I can understand that if there were issues at branches, then end users wanted to voice their views to the faces of the programme, which was often the on-site engineers. The engineers did in some instances raise incidents with the Service Desk on behalf of the branches, and sometimes raised their own incidents, for example when they arrived on the agreed planned date to install a branch router only to be told by the Sub-Postmaster that they could not undertake the installation because they were too busy. This meant a substantial effort was required to re-schedule visits.

70. During the branch router rollout, which had to be completed before software deployment, there were problems with access to some branch sites, and some of the branch routers failed and had to be replaced. During the pilots, the main issues were screen freezes and network timeouts.

HORIZON LITIGATION

71. I have been asked to set out my recollection of the following bugs, error or defects as defined by Fraser J in Appendices 1 and 2 of *Bates & Others v. Post Office Limited* [2019] EWHC 3408(QB): the receipts and payments mismatch bug; the suspense account bug; the Dalmellington bug/branch outreach issue; the remming in bug; the local suspense account issue; recovery issues; withdrawn stock discrepancies; Bureau discrepancies; Post & Go / TA discrepancies in POLSAP; bureau de change; and Lyca top-up.

72. I remember the headline names of the suspense account and remming in bugs. I'm not sure now but am fairly confident that they occurred during the pilot and were fixed. I do not remember any specific details about these bugs. I do know that there was a highly transparent process during the pilot and rollout of sharing with the customer details of any bugs that were found, and the progress to resolution was also shared.

73. I am not aware of any other issues that arose at the time.

REFLECTIONS

74. Looking back, I don't think there is anything I could have done differently. Alongside a large number of other people in the team, I worked exceptionally hard over many months to overcome a number of technical and logistical challenges to implement a highly complex application across the UK Post Office

estate. I called out any issues which occurred, we raised them with the customer and there was a massive drive and determination to deliver to the customer. I know that the customer team was frustrated by the delays and this frustration was compounded when more issues were found during the pilot. However, piloting the system in a small number of branches was a sensible approach given the complexity of the system, and it should not have been a surprise that issues were found, in spite of the volume of testing (both by Fujitsu and the Post Office) before deployment. The solution used cutting edge technology (from the Oracle database to the use of Java for aspects of the software development) and had to work over limited network bandwidth.

75. If I had been involved from the beginning of the programme, I would have wanted to ensure that the Testing Strategy was robust and made adequate provision for end-to-end application testing, user acceptance testing, performance load testing and service readiness testing. From what I heard when I came into the programme, the original development and implementation timescales that were set and agreed for HNG-X after pressure from the customer and senior Fujitsu management were very optimistic. It was only after a detailed replan in the spring of 2009 that more realistic dates emerged, which in turn changed when the pilot had to be stopped.

76. The Inquiry has asked who I think is responsible for the Post Office scandal. I find this a very difficult question to answer. The Horizon IT System is still in use across the Post Office branch estate. Ultimately, the Post Office accepted the results of User Acceptance Testing and gave permission for the HNG-X

software to be deployed. It was also ultimately the Post Office's decision to prosecute Sub-Postmasters. I understand that there had been prosecutions of Sub-Postmasters for fraud on the original Horizon application, before HNG-X was rolled out. I was not involved in any of the cases that were pursued using data from HNG-X and I do not know what the process was to validate individual accusations of fraud. It is likely that decisions to prosecute were taken based on technical interpretations of data record histories at branches. I don't know if these technical interpretations were assessed and compared against detailed operational processes and best practices before coming to a decision to prosecute, i.e. validated by "expert" sub-postmasters and/or financial process consultants (e.g. forensic financial auditors). They should have been. As I have mentioned before, HNG-X is a complex system, with many processes to follow. It is quite possible that Sub-Postmasters and their staff may not in some cases have understood the processes required to run the system correctly and therefore made genuine errors in how they used the system which resulted in financial record irregularities.

77. In terms of what the Post Office could have done differently, I don't know if the Post Office put enough resources into User Acceptance Testing or end user training and adoption to ensure good compliance with end-to-end business processes. Perhaps more thorough sign-offs on user training would have helped, and then follow-up reviews with branches, for example using on-line tests for each area of the system to make sure that the staff really understood how to use the system and how to run end of day and monthly reconciliation processes would have helped.

78. Perhaps adopting a different attitude towards the sub-postmasters would also have helped. I detected that there was a culture in the central Post Office team of not really trusting the branch managers and their staff – there was clearly a divide between the full-time Post Office staff in the central teams (including the staff running the 500 or so largest Post Office owned branches) and the more independent sub-postmasters running small local branches. I heard (but did not witness directly) that senior stakeholders at Post Office would often take their frustrations out on both their own Programme team and on the Fujitsu Client Director at the time. When issues arose, Post Office senior stakeholders would often demand lots of information very quickly which sometimes got in the way of our efforts to diagnose and resolve issues, I can appreciate senior stakeholders may have been frustrated by the delays and under pressure from Executives but, in the end, with complex technical programmes like this, the core teams needed to be given time and space to resolve issues in a logical, controlled way.

79. If there are accusations of fraud, then there should be a clear, transparent and consistent process by which evidence is gathered, validated operationally and shared with the defendants and reviewed before any decision is taken to prosecute.

80. There are no other matters that I consider will assist the Chair.

Statement of Truth

I believe the content of this statement to be true.

Signed: **GRO** _____

Dated: _____ 27th January 2023

Index to the First Witness Statement of GEOFFREY IAN BUTTS

Exhibit No.	Control Number	Document Description	URN
WITN03860 100_01/1	POL-0030054	HNG-X Solution Architecture Outline - Version:5.0	POL00033119
WITN03860 100_01/2	POINQ0008445F	HNG-X Migration Strategy - Agreed Assumptions and Constraints	FUJ00002274
WITN03860 100_01/3	POINQ0086254F	Fujitsu/Post Office: Operational Level Agreement HNG-X 4th line support v1.0	FUJ00080083
WITN03860 100_01/4	POINQ0086344F	Major Incident - Process, Information & Communication Flow Chart	FUJ00080173
WITN03860 100_01/5	POINQ0086343F	Fujitsu/Post Office: POA Customer Service Major Incident Process v5.1	FUJ00080172
WITN03860 100_01/6	POINQ0094728F	Fujitsu/Post Office HNG-X Wide Area Network HLD v1.1	FUJ00088557
WITN03860 100_01/7	POINQ0094804F	Fujitsu/Horizon Low Level Design Document titled "HNG-X Support Network LLD" v1.8 authored by Jon Dawes	FUJ00088633
WITN03860 100_01/8	POINQ0104339F	Email re HNG-X Migration Major Incident	FUJ00098168
WITN03860 100_01/9	POINQ0008340F	EMV – Banking and Retail - Horizon - LINK Mapping (V.4.0)	FUJ00002169
WITN03860 100_01/10	POINQ0008341F	EMV – Banking and Retail - NBX – LINK Application Interface Specification (AIS) (V.5.0)	FUJ00002170
WITN03860 100_01/11	POINQ0008444F	Fujitsu/Post Office: HNG- X Branch Exception Handling Strategy - Agreed Assumptions and Constraints v2.0	FUJ00002273
WITN03860 100_01/12	POINQ0090430F	Email attaching HNG-X Migration RAG Report	FUJ00084259
WITN03860 100_01/13	POINQ0090432F	Email attaching HNG-X Migration RAG Report - 03/03/2010	FUJ00084261

Exhibit No.	Control Number	Document Description	URN
WITN03860 100_01/14	POINQ0090433F	HNG-X Migration RAG Report	FUJ00084262
WITN03860 100_01/15	POINQ0090698F	Email from Pat Lywood with the subject "RE: 9/7 Prayers"	FUJ00084527
WITN03860 100_01/16	POINQ0090468F	HNG-X Migration RAG Report - 2010-03-31	FUJ00084297
WITN03860 100_01/17	POINQ0087242F	Email from Graham Welsh to Fujitsu team re: proposed fix to error concerning rates board & region	FUJ00081071
WITN03860 100_01/18	POINQ0087230F	Email from Becky Eynon to various Fujitsu colleagues re Branch Router Rollout dated 15 March 2010	FUJ00081059
WITN03860 100_01/19	POINQ0087231F	Spreadsheet: Recording Successful Router Installation for Horizon Online, 15 March 2010	FUJ00081060
WITN03860 100_01/20	POINQ0008289F	Service Description: Fujitsu Central Network Services: Service Description (HNG-X) (Contract Controlled Document) v3	FUJ00002118
WITN03860 100_01/21	POINQ0008291F	Fujitsu Branch Network Service Description - Contract Controlled Document v4.0	FUJ00002120
WITN03860 100_01/22	POINQ0008342F	EMV – Banking and Retail - NBX Business Parameters (V.5.0)	FUJ00002171
WITN03860 100_01/23	POINQ0008401F	Fujitsu: HNG-X to RMG Technical Interface Specification v2.0	FUJ00002230
WITN03860 100_01/24	POINQ0008407F	Fujitsu Service Desk Description v3.0	FUJ00002236
WITN03860 100_01/25	POINQ0008409F	Fujitsu Services: Application Interface Specification: Horizon to e-pay (V.6.0)	FUJ00002238
WITN03860 100_01/26	POINQ0008411F	Post Office: EMV - Banking and Retail, NBS - CAPO Application Interface Specification	FUJ00002240

Exhibit No.	Control Number	Document Description	URN
WITN03860 100_01/27	POINQ0008421F	Fujitsu/PO: Service Desk Description v4.0	FUJ00002250
WITN03860 100_01/28	POINQ0008448F	Fujitsu/Post Office: Engineering Service - Service Description v4.0	FUJ00002277
WITN03860 100_01/29	POINQ0008607F	Post Office: EMV - Banking and Retail - Horizon - Card Account Mapping v3.0	FUJ00002436
WITN03860 100_01/30	POINQ0086647F	Fujitsu/Post Office: Service Desk Service Description v3.0 (with tracked changes/comments)	FUJ00080476
WITN03860 100_01/31	POINQ0087262F	Email from Lionel Higman to others re All Open Calls of Type R (Release Notes)	FUJ00081091
WITN03860 100_01/32	POINQ0087363F	Spreadsheet setting out all open calls excluding calls of Type R (release notes)	FUJ00081192
WITN03860 100_01/33	POINQ0008418F	Fujitsu Services: Bureau Rate Board Technical Installation Guide v4.0.	FUJ00002247
WITN03860 100_01/34	POINQ0008430F	Fujitsu Services: Bureau Rate Board Technical Maintenances Guide v2.0	FUJ00002259
WITN03860 100_01/35	POINQ0008436F	Fujitsu Services: Bureau Rate Board Technical Maintenance Guide v3.0	FUJ00002265