

Witness Name: David Jones

Statement No: WITN06770100

Dated: 22/3/2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF DAVID JONES

I, David Jones, will say as follows:-

INTRODUCTION

1. I am a former employee of ICL Pathway and held the position of Designer/Developer.
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 17th January 2023 (the "**Request**").
3. In this witness statement I adopt the headings and paragraph numbers of the questions in Appendix 1 to the letter from the Inquiry dated 17th January 2023.

4. I should say at the outset that I have very little clear recollection of the matters referred to in the questions which have been put to me. That is partly because of the passage of time, the matters occurred more than 20 years ago. It is also because, as explained below, I had very little involvement in the aspects of the Horizon system which are of interest to the Inquiry. Nonetheless, in this witness statement, I have sought to be as helpful to the Inquiry as I can be.

BACKGROUND

3. I have been asked to set out my professional background and I can confirm it is as follows.
4. I worked in several IT organizations from approximately 1989 before joining ICL in approximately 1991 via a subsidiary company Omnia, which specialized in Branch System software for UK building societies using ICL hardware. Omina became part of ICL Financial Services in approximately 1993, where I continued to work until 1996.
5. In respect of my role in relation to the Horizon IT Project, I can confirm I moved to ICL Pathway, initially on a three-month secondment, in approximately June 1996 as a Designer/Developer working on the DSS/Benefit Payment Card project within Horizon.
6. As I recall, there were at the time two planned aspects of Horizon. Firstly, there was EPOSS which was developed and ultimately delivered to the Post Office. But also, secondly, there was planned to be a separate system known

as "Payment Card Functions" (or "PCDF"). These functions supported the Benefit Encashment Service (or "BES"). Eventually the development of PCDF was discontinued and nothing was delivered.

7. I was almost entirely dedicated to the PCDF system. Although my recollection of the actual delivery phases is limited, I do recall there was a point when a new set of requirements were issued which required new designs and software to be written to enhance PCDF. At this stage I was responsible for identifying, specifying, and estimating these changes to PCDF with the development work passing to a team from the ICL Centre Of Excellence in Manchester.
8. I continued in this role until the termination of the DSS/Benefit Payment Card project in 1999, when I was reassigned to the Automated Payments System (the "APS"), which was a discrete part of Horizon. APS was responsible for bill payments on Horizon. As far as I am aware, no serious bugs were found in relation to APS. I have few memories of this period but I assume that I performed a similar design role in relation to APS as I did in respect of the PCDF system.
9. The one exception to this was for a brief period (perhaps three to four weeks) in I believe 1999 when I was called into what was known as the "EPOSS Taskforce", a team to seek to identify and resolve bugs in the Horizon system. This was an intensive period of work but I cannot remember any details from this period.

10. In April 2001, I joined Escher Group as Support Manager responsible for a team of technicians supporting the Escher software for customers around the world. One of those customers was Fujitsu but I do not recall any individual issue that was raised by Fujitsu with Escher in relation to the Horizon project. I moved out of that role approximately 12-18 months later and subsequently had no further involvement with the Horizon project.

11. I have been asked to set out anything else I wish to say that is relevant to my roles at Fujitsu and Escher Group Ltd I can confirm that my only involvement with EPOSS was as part of the EPOSS Task Force referred to above.

THE DEVELOPMENT OF HORIZON

12. I have been asked to consider document ICL Pathway: Pathway to HAPS Application Reference Specification (Horizon release 2+) dated 10/04/2000 (FUJ00001374), ICL Pathway Generalised API for OPS/TMS v1 Appendix A dated 10/04/2000 (FUJ00001378) and CSR+APS Processes and Procedures v 4.0 dated 12/12/2000(FUJ00001497).I can confirm that I can see that my name is included in these documents but I have no recollection of the detail within them or having worked on them.

13. I have been asked to set out my involvement with the development of Legacy Horizon, I can confirm that my involvement was limited to -

- the design and development of Payment Card Functions (PCDF) for the DSS/Payment Card system within the overall project;
 - a development resource for the EPOSS Task force for a period of a few weeks; and
 - as part of the APS team in what I believe was a design capacity.
14. I have been asked to consider a Report on the EPOSS PinICL Task Force v 1.0 dated 14/05/2001 (FUJ00080690) I can confirm that I was brought in as a development resource for the EPOSS Task Force and fixed several bugs during that period. I do not recall any specific detail of the work I completed while on the Task Force.
15. I recall working on the EPOSS Task Force for a period of approximately three weeks as I was required to return to my existing PDCF work. I do not recall being aware of or discussing the proposal to re-write the EPOSS software during this time.
16. My only knowledge of problems with EPOSS was being included in the EPOSS Task Force event and my awareness of the large number of outstanding EPOSS bugs.
17. One other point of awareness of concerns with EPOSS was when I was asked directly by the Development Director to provide details of the total number of lines of code within PDCF. I understood this was to be used as a bugs vs lines of code comparison between the sets of software.

18. I have been asked to consider FUJ00077932, FUJ00077938, FUJ00077943, FUJ00077947 and FUJ00077951, which are working group meeting of CRS+ Working Group and to confirm my involvement. I can confirm that I have no recollection of the CRS+ Working Group, the reason for its formation or who attended the meetings.

IDENTIFICATION OF BUGS, ERRORS AND DEFECTS

19. As regards paragraph 5, in respect of providing technical support, advice or assistance to postmasters, I can confirm that I had no involvement in any of those activities.
20. I have been asked to explain the purpose(s) of the “Known Error Log” or “KEL” database, how it operated and who had access to it, I can confirm that I have no recollection of the KEL database other than I do recall the name being used during the Horizon project.
21. I have been asked whether the KEL system was adequate for that / those purpose(s), I can confirm that I have no recollection of the KEL system so I am unable to answer the question.
22. I have been asked to describe the process a person would follow to search the KEL database to determine if a similar error or problem had arisen before, I can confirm that I have no recollection of the KEL database so I am unable to answer the question.

23. I have been asked to explain how support services would provide support in relation to a suspected bug, error or defect in third-party software such as Riposte, I can confirm that I did not work in support services so I am unable to answer the question.
24. I have been asked to set out the identification and rectification of the specific bugs, errors or defects listed, I can confirm that I have no recollection of any bugs or issues that had the potential (a) to cause apparent discrepancies or shortfalls in branch accounts or (b) undermine the reliability of the Horizon IT System accurately to process and to record transactions.
25. I have been asked to set out the process Fujitsu would follow when a bug, error or defect was identified, I can confirm that I have no recollection of this process and do not recall being involved in such a process.
26. I have been asked if the Post Office or Fujitsu's ability to identify and rectify bugs, error and defects was adequate, I can confirm that I have no recollection of this process so I am unable to provide an opinion. Moreover, I do not think that I would at any time have had sufficient overview or knowledge to determine whether they were adequate.
27. I have been asked whether the information passed to sub postmasters was adequate, I can confirm that I have no recollection as to what information was passed to sub postmasters so I am unable to provide an opinion. Moreover, once again, I do not think that I would at any time have had sufficient overview or knowledge to determine whether they were adequate.

28. I have been asked, with hindsight whether the Legacy Horizon and / or Horizon Online was robust, I can confirm that I do not have sufficient knowledge of either system to be able to provide an opinion.
29. Finally, I am not aware of anything else of which I think the Chair should be aware.

Statement of Truth

I believe the content of this statement to be true.

GRO

Signed: _____

Dated: ____22/3/2023_____

Index to First Witness Statement of David Jones

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control Number</u>
1	FUJ00001374	ICL Pathway: Pathway to HAPS Application Reference Specification (Horizon Release 2+) dated 10/04/2000	POINQ0007545F
2	FUJ00001378	ICL Pathway Generalised API for OPS/TMS v1 Appendix A dated 10/04/2000	POINQ0007549F
3	FUJ00001497	CSR+ APS Processes and Procedures V 4.0 dated 12/12/2000	POINQ0007668F
4	FUJ00080690	Report on the EPOSS PinICL Task Force V 1.0 dated 14/05/2001	POINQ0086861F
5	FUJ00077932	Minutes of CSR+ Working Group Meeting no. 13 on 02/02/00	POINQ0067520F
6	FUJ00077938	Minutes of CSR+ Working Group Meeting No.15 on 01/03/2000	POINQ0067526F
7	FUJ00077943	Minutes of CSR + Working Group Meeting on 15/03/2000	POINQ0067531F
8	FUJ00077947	Minutes of CSR+ Working Group Meeting of 29/03/2000	POINQ0067535F
9	FUJ00077951	Minutes of CSR+ Working Group Meeting No.18 on 12/04/2000	POINQ0067539F