

Witness Name: Jessica Barker

Statement No.: WITN09810100

Dated: 25 November 2024

## POST OFFICE HORIZON IT INQUIRY

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### FIRST WITNESS STATEMENT OF JESSICA BARKER

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I, Jessica Barker, will say as follows

#### **INTRODUCTION**

1. I am a former contractor of the Post Office Limited (“POL”) working on the Horizon Initial Complaint Review and Mediation Scheme (“the Scheme”); I held the position of Mediation and Information Analyst.
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 03 October 2024 (the “Request”). I instructed Olliers Solicitors to assist me with the preparation of this statement.

#### **BACKGROUND**

3. I have been asked to set out my educational and professional qualifications, as well as details of my career to date.
4. I am educated to university level and hold both a Bachelor of Arts and Master of Arts degree. I also undertook a Postgraduate degree in Civic Design with the School of Engineering at the University of Liverpool.

5. Having completed my studies, I worked for a cyber security firm called Templar Executives from 2011 until 2013 when I decided to become an independent contractor albeit still working within the field of cyber security consultancy.
6. My work at this time focused on the provision of information security training and policy services and I tended to secure work via recommendations and networking.
7. This was how I came to work on the Scheme. I was approached by Belinda Crowe through Alexander Mann Solutions. We had worked on some projects together with my previous employer.
8. To the best of my recollection, Belinda told me that the role would involve providing support to a team being established to run the mediation scheme intended to find a fair resolution to claims brought by Sub-Postmasters ("SPMs") in respect of the Horizon IT System.
9. So far as I can remember, I submitted my CV and had a telephone interview with Belinda Crowe before beginning the contract in December 2013.
10. The contract was initially intended to be a six-month fixed term engagement which was subsequently extended so that I ended up working on the Scheme until June 2015.
11. It was expected that my role would focus on the information security processes and training for the Scheme, but this expanded to include more general administrative functions including arranging meetings, proofreading documents and ensuring that all parties were aware of pending deadlines and their obligations re the same.

12. When my contract ended, I continued working as an independent contractor before setting up my own small cyber security company which I now run from the United States of America, having relocated with my family in 2023 due to greater business opportunities and frankly better weather.

### **The Horizon IT System**

13. I had no personal experience or knowledge of the Horizon IT System prior to my role with the Scheme. To the best of my recollection, Belinda Crowe made me aware of the fact that SPMs had raised concerns about possible bugs or defects with the system, as well as a lack of integrity in relation to how it functioned.

14. Even when I worked on the Scheme, I had no direct involvement with the Horizon IT system and never received any training on it, nor did I expect to be, given the nature of the role that I was taken on to complete.

15. So far as I was concerned the Scheme had been established as part of the POL commitment to investigate and resolve SPMs' claims and as such I was under the impression throughout that concerns about bugs, defects and integrity were investigated and resolved by the POL, working in conjunction with Fujitsu.

16. My understanding in this regard was informed by responses such as those evident in the email from Belinda Crowe to Mark Underwood and myself dated 20 October 2014 (POL00211158) and the email chain

between Angela van den Bogerd, Andy Holt, and me, dated 1 May 2014 (POL00367583).

17. I also do not recall being made aware of any major issues having been identified as part of the Second Sight interim report but again, I would like to stress that my role was very much intended to deal with information security training and processes for the Scheme and not the ins and outs of the Horizon IT System and the issues raised by the SPMs or anyone else.

18. At the time of working on the Scheme, I was unaware of the POL having a prosecutorial function.

19. So far as my understanding of the ability for Fujitsu employees to alter transactions or data in branch accounts without the knowledge or consent of SPMs, this would have been based purely on the information provided in emails such as those referenced above (POL00211158 and POL00367583) in which reassurances were provided as to how the system access worked in order to maintain the integrity.

20. I have been provided with a copy of a May 2009 Computer Weekly article (POL00041564). Having seen this, I do recall reading it when I started my contract back in 2013; I believe that Belinda Crowe may have suggested that I read it to understand the background and need for the Scheme, particularly from the perspective of the SPMs.

21. Apart from that I have no recollection of discussing the article with anyone during my time working on the Scheme.

22. I have no knowledge of the term ARQ data and no specific knowledge of remote access beyond that which I have alluded to at paragraph 19 above in relation to the reassurances provided by Fujitsu in relation to system access.

**The Initial Complaint Review and Mediation Scheme (“the Scheme”)**

23. I was a part-time contractor throughout my time working on the Scheme from December 2013 to June 2015.

24. When I started, I think there were five people working on the Scheme and this grew to about twelve over time.

25. As previously stated, I was brought on board due to my background in information security. I was tasked with ensuring any sensitive data relating to SPMs, including their personal, financial and medical details remained confidential.

26. I provided data protection training and process reviews as reflected in documents including the email I sent on 26 March 2014 to John Breeden, Nick Beal, Mark Wright and others in relation to “Mediation Representative Training” (POL00147852) and the Initial Complaint and Mediation Scheme Workshop presentation (POL00147060).

27. My role extended to include more administrative functions with duties relating to the structure of the mediation process, proofreading documents and ensuring that the relevant parties adhered to deadlines.

28. Examples of my administrative function can be seen in the email from Andrew Parsons dated 31/12/2013 (POL00061066) and my email dated 02/01/2014 to Shirley Hailstones regarding potential

- improvements to the executive summary and report for South Warnborough M035 (POL00061070).
29. In terms of developing the structure of the mediation process, I simply collated the information provided to me by Belinda Crowe and Andrew Parsons.
30. An example of this can be seen in the email from Belinda to me dated 11/12/2013 with the subject "Network Representatives for Mediation" (POL00300875).
31. Further examples include an email from Andrew Parsons to me dated 12/12/2013 (POL00300882) and an email from me on the same day to Belinda Crowe and others, also on the topic of "Network Representatives for Mediation" (POL00300879).
32. I drafted process maps based on the information provided as can be seen from the material available to the Inquiry, including the email from me to Andrew Parsons and others dated 29/12/2013 re the Mediation Process Maps (POL00407812), as well as the Stakeholder Mediation Process Diagram of the same date (POL00407813) and the Stakeholder Scheme Mediation Map (POL00138162) dated 27/02/2014.
33. My involvement so far as the Scheme's responses to Second Sight investigations and/or applications made to the Scheme, included ensuring the timely progression of such matters with effective monitoring and follow up with POL around deadlines. This can be seen in my emails including on 05/09/2014 when I emailed Belinda Crowe and Andrew Parsons re draft case review report ("CRR") responses

(POL00136838); my email of 14/01/2015 to Chris Aujard, Belinda Crowe and others, also in relation to draft CRR responses (POL00076785); the email from Angela Van-Den- Bogerd to me and others dated 05/02/2015 re draft CRR Response/ Settlement Analysis (POL00221283) and my email of 30/05/2014 to Chris Aujard, Belinda Crowe and others with the subject "Second Sight case review report: process for response" (POL00204947).

34. As previously mentioned, I proofread documents to identify errors and/or potential structural changes to make the documents easier to follow and understand. This is evidenced, for example, by the email dated 09/05/2014 from me to David Oliver and others (POL00204063). I did not, however, make or suggest material changes to documents such that the intent, meaning or message would change from that intended by the original author, whoever that may be.
35. I was also very often a go-between who would relay information amongst various members of the team, for example, the Scheme workshop agenda dated 17/12/2013 (POL00147063); the email chain from Daniel Fawcett to me and others re a draft CRR dated 21/10/2014 (POL00211189) and the email from me to Belinda Crowe and Andrew Parsons dated 05/09/2014 (POL00136838).
36. Whilst I may have been privy to information which I collated and distributed to others, I must stress that I had no decision-making authority and was not involved in strategy discussions or decisions around the disclosure of documentation.

37. I did not brief Paula Vennells or other senior managers within the POL.

It is possible that I may have supported others who were involved in such briefings, for example by collating information provided by senior members of the team such as Belinda Crowe and David Oliver. Given the passage of time, I am unable to recall any particular examples.

38. I have no specific recollection of ever having heard about allegations that POL may have had unexplained profits caused by SPMs settling illusory discrepancies, but I can say for certain that I had absolutely no involvement with any investigation of POL's suspense account or any such allegations.

39. My role was that of a part-time junior contractor; I was not given any reason to question the accuracy of the information being exchanged between the parties to the Scheme and I was not aware of anything which caused me to question the integrity of the Scheme, certainly not in respect of the discreet tasks that I was involved in.

40. Whilst there may have been some disagreements around scheduling Working Group meetings, as I was reminded of when I reviewed the Inquiry document dated 10/04/2014 which referenced the cancellation of a case conference call (POL00202819), I do not recall any specific tensions and I am unable to comment any further on the day to day working relationships between any particular individuals or groups.

41. There were indications of what are perhaps best termed as mis-aligned expectations in terms of Second Sight's role and the accuracy of their reports as seen in my email to Belinda Crowe on 21/05/2013



(POL00204776) and the email dated 30/12/2013 between Andrew Parsons, Angela Van- Den-Bogerd and others (POL00199179).

42. However, even if such issues did exist, they were not directly related to the tasks that I was engaged to complete which as I have said had become largely administrative and procedural as time went on.

### **Termination of the Scheme and engagement of Second Sight**

43. So far as I can recall, I was tasked with drafting the email I sent to Tom Wechsler and others dated 16 March 2015 (POL00151646). This was based on information provided to me by senior members of the Scheme team including Belinda Crowe, Tom Wechsler and Patrick Bourke.

44. As stated, my role evolved from cybersecurity consultant to proofreader, administrator and general go-between. It did not, however, ever extend to influencer or decision maker and as such I had no influence or involvement in closing the Scheme or terminating Second Sight's engagement.

### **Working with POL**

45. Whilst I may have been involved in proofreading documents and distributing information between different parties ahead of meetings and deadlines, I did not have any strategic role in meeting with or preparing briefs for meetings with Second Sight, MPs or SPMs.

46. The same can be said of my role in relation to communications more generally; I held a very junior role and my focus was on completing the

- tasks assigned to me. I had no meaningful influence or authority in respect of the policies or communications coming out of the Scheme.
47. I have reflected extensively on my role with POL and in particular the Scheme; the nature of my job was such that there isn't anything that I would have done differently.
48. Whilst I am, of course, aware of and supportive of the important work of the Inquiry into POL and the Horizon IT System, I genuinely cannot think of anything that I could have done or said which would have changed how the SPMs were dealt with.
49. I have done my best to address all the issues raised in the Inquiry's Rule 9 Request and the contents of this statement are true to the best of my knowledge and recollection.

**Statement of Truth**

I believe the content of this statement to be true.

Signed: GRO \_\_\_\_\_

Dated: 25 November 2024

**JESSICA BARKER RULE 9- INDEX TO WITNESS STATEMENT**

No.	URN	Document Date	Document Description	Control Number
1	POL00211158	20/10/2014	Email from Belinda Crowe To: Mark Underwood, Jessica Barker CC: Belinda Crowe re FW: Strictly Private & Confidential - Subject to Privilege arising from M008 - Rivenhall	POL-BSFF-0049221
2	POL00367583	01/05/2014	Email from Angela Van-Den- Boger to Andy Holt, Jessica Barker re: URGENT ACTION PLEASE	POL-0185714

3	POL00041564	MAY 2009	May 2009 Computer Weekly article	POL-0038046
4	POL00147852	26/03/2014	Email from Jessica Barker to John Breeden, Nick Beal, Mark S Wright & others - RE: Mediation Representative Training	POL-BSFF-0006975
5	POL00147060	17/12/2013	Initial Complaint and Mediation Scheme Workshop	POL-BSFF-0006185
6	POL00061066	31/12/2013	Email from Andrew Parsons to Shirley Hailstones to Angela Van-Den- Bogerd, Rodric Williams and others re South Warnborough M035	POL-0057545

7	POL00061070	02/01/2014	Email correspondence from Jessica Barker to Shirley Hailstones re: improvements to exec summary & report - South Warnborough M035 (Jo Hamilton's case)	POL-0057549
8	POL00300875	11/12/2013	Email from Belinda Crowe to Jessica Barker cc Nicky Mal, David Oliver and others RE: Fwd: Network Representatives for Mediation	POL-BSFF-0138925
9	POL00300882	12/12/2013	Email from Andrew Parsons to Jessica Barker RE: Network	POL-BSFF-0138932

			Representatives for Mediation.	
10	POL00300879	12/12/2013	Email from Jessica Barker to Belinda Crowe cc Nicky Mal, David Oliver and others RE: Network Representatives for Mediation	POL-BSFF-0138929
11	POL00407812	29/12/2013	Email from Jessica Barker to Andrew Parsons, Rodric Williams, Chris Aujard and others re: Mediation process maps	POL-BSFF-0232779
12	POL00407813	29/12/2013	Stakeholder mediation process diagram	POL-BSFF-0232780
13	POL00138162	27/02/2014	Stakeholder Scheme Mediation Map.	POL-BSFF-0000391

14	POL00136838	05/09/2014	Email from Jessica Barker to Belinda Crowe and Andrew Parsons re: M029 and M039 draft CRR responses	POL-0125392
15	POL00076785	14/01/2015	Email from Jessica Barker to Chris Aujard, Belinda Crowe, Rodric Williams, and others re: Draft CRRs: MO56, M064, M101, M105, M109, and M119 - Mediation Scheme	POL-0073348
16	POL00221283	05/02/2015	Email from Angela Van-Den- Bogerd to Jessica Barker and others. CC	POL-BSFF-0059346

			ing Patrick Bourke, Belinda Crowe and others. RE: M075 - draft CRR Response / Settlement Analysis [BD- 4A.FID26231777]	
17	POL00204947	30/05/2014	Email from Jessica Barker to Chris Aujard, Belinda Crowe, Angela Van-Den- Bogerd and others RE: Second Sight case review report: process for response	POL-BSFF-0043010
18	POL00204063	09/05/2014	Email from Jessica Barker to David Oliver and others re Letter to SS - M022.doc	POL-BSFF-0042126



19	POL00147063	17/12/2013	Post Office Initial Review and Mediation Scheme workshop agenda.	POL-BSFF-0006188
20	POL00211189	21/10/2014	Email chain from Daniel Fawcett to Jessica Barker, Chris Aujard, Belinda Crowe and others re M078 draft CRR.	POL-BSFF-0049252
21	POL00202819	10/04/2014	Matrix, Post Office, JFSA, Linnell & Co and Advanced Forensics emails re working group case conference call cancellation.	POL-BSFF-0040882
22	POL00204776	21/05/2013	Email from Jessica Barker to Belinda Crowe re M022	POL-BSFF-0042839

23	POL00199179	30/12/2013	Email chain between Andrew Parsons, Angela Van-Den-Bogerd, Belinda Crowe and others re: mediation	POL-BSFF-0037242
24	POL00151646	16/03/2015	Email chain from Jessica Barker to Tom Wechsler, Belinda Crowe and others re draft note for Reps	POL-BSFF-0010758