

Wednesday, 10 May 2023

(10.00 am)

MR BEER: Good morning, sir, can you see answering hear me?

SIR WYN WILLIAMS: Yes, I can, thank you very much.

MR BEER: May I call Stephen Parker, please.

STEPHEN PARKER (affirmed)

Questioned by MR BEER

MR BEER: Good morning, Mr Parker, my name is Jason Beer and I ask questions on behalf of the Inquiry. Can you give us your full name, please?

A. Stephen Paul Parker.

Q. Thank you very much for coming to the Inquiry to assist us today and thank you also for the provision of a witness statement. Can we look at that to start with, please. It's dated 27 March of this year, and if you turn to page 38 of it, you should see a signature.

A. I do and that's mine.

Q. Is that your signature?

A. Yes, it is.

Q. Are the contents of that witness statement true to the best of your knowledge and belief?

A. Yes, they are.

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2019 witness statements, when you were making your current witness statement, did you have them in front of you when you were making it?

A. I did, and I cribbed some of the wording to save rewriting it.

Q. When you say "cribbed" to you mean cut and paste it?

A. Not exactly cut and paste. Cut and minor changes.

Q. Okay. Did you write stuff afresh?

A. Oh, yes, yes. Most of it was. I mean, we're probably only talking about one or two minor paragraphs that were actually copied.

Q. I understand. Can we start, please, with your career and qualifications. You tell us in your witness statement that you left school at 16; is that right?

A. That's correct, yes.

Q. Do you have any professional qualifications --

A. I don't, no.

Q. -- that are relevant to what we're going to speak about today?

A. No.

Q. I think you moved to ICL, as it was then called, in 1985; is that right?

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Q. Thank you. For the purpose of the transcript -- there's no need to display it -- that statement is WITN00680100.

Mr Parker, I'm only going to ask you questions today about the issues that arise in what we call Phase 3 of the Inquiry. We may ask you to return at a later stage in the Inquiry to answer questions about Phase 5 of the Inquiry and, in particular, the role that you took and the evidence that you gave in the GLO trial, the *Bates* trial, including the making of three witness statements on 16 November 2018, 29 January 2019 and the 28 February 2019, and then when you gave oral evidence before Mr Justice Fraser on the 11 April 2019.

I'm going to be asking you some questions today about some individual cases which are going to be considered in Phase 4 of the Inquiry because it's not currently our intention that you should come along and give evidence in Phase 4; do you understand?

A. I do.

Q. Thank you. Just as a general question, however, those three witness statements that I mentioned, the November 2018, the January 2019 and February

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A. That's correct, yes.

Q. You stayed there until you retired in December 2019, it had changed name in the meantime. So you worked for the company, you were a company man for some 34 years; is that right?

A. That's correct, yes.

Q. You tell us in your witness statement that in that time you received what you describe as "industry specific, technical and skilled training". Can you in broad terms tell us what you mean by that?

A. It was generally training on particular programming languages or methodologies. Some people skills training for team leading and management purposes. Just general IT industry training.

Q. Was it externally provided or in-house or a bit of both?

A. A bit of both.

Q. Can we look at the roles, in general terms, that you performed when you moved to the SSC, and I think you were there for 22 years by my calculations; is that right?

A. Yes.

Q. Can we look at a couple of documents alongside

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1 each other, please. I think we can do this.
 2 They'll come up on the screen for you.
 3 To start with, can we look at your Inquiry
 4 witness statement, please, at page 2. It's
 5 really paragraphs 4 and 5 that I'm interested in
 6 there. Thank you. At the same time can we look
 7 at FUJ00082231. Can we look at page 2 of that
 8 witness statement, please, and, in particular,
 9 paragraph 7. So on the left-hand side you've
 10 got your High Court witness statement, on the
 11 right-hand side you've got the Inquiry witness
 12 statement; do you understand?
 13 A. I do indeed.
 14 Q. You'll see that paragraph 4 of the Inquiry
 15 witness statement, on the right-hand side, is,
 16 give or take a few words, the same as the first
 17 sentence in paragraph 7 of your High Court
 18 witness statement?
 19 A. Yes, indeed.
 20 Q. "I began working in July '97", "I began working
 21 in July '97", yes?
 22 A. Yes.
 23 Q. If you look at paragraph 5 of the witness
 24 statement on the right-hand side, your Inquiry
 25 witness statement, the one beginning "My
 5

1 like the SSC, live website, were a cooperative
 2 effort. I took over that role in order to sort
 3 out some problems we had with the website, and
 4 carried on in that role for a period of time.
 5 But my role in that gradually diminished, as
 6 other people started to take over some of the
 7 website's development. It's difficult for me to
 8 quantify for you the exact periods when I was
 9 leading it and when I was just contributing to
 10 it.
 11 Q. My question is, why has "I was the lead designer
 12 and part of the development team" become "I was
 13 for a few years the lead designer and part of
 14 the development team"?
 15 A. I have no particular reason for that, it was
 16 just the way I was writing it at -- in the
 17 second witness statement.
 18 Q. If you had the witness statement in front of
 19 you, the High Court witness statement in front
 20 of you, which seems to be the case from what you
 21 said earlier and certainly for these paragraphs,
 22 because of materially the same language, what
 23 motivated you to insert the phrase "for a few
 24 years"?
 25 A. I think because I didn't want to give the
 7

1 technical role", and compare it to the rest of
 2 paragraph 7 on the left-hand side --
 3 A. Yeah.
 4 Q. -- do you see any difference?
 5 A. You'll probably need to point out to me the
 6 difference you're interested in.
 7 Q. Just look at the witness statement on the
 8 left-hand side. You say:
 9 "Within this role [the third line] I was the
 10 lead designer and part of the development team."
 11 Yes?
 12 A. Yes.
 13 Q. Then, on the right-hand side, paragraph 5, you
 14 say:
 15 "Within this role I also developed some of
 16 the support tools used by the SSC and was for
 17 a few years the lead designer and part of the
 18 development team ..."
 19 A. Yes.
 20 Q. So it's that. The insertion of the "I was for
 21 a few years", rather than "I was the lead
 22 designer".
 23 A. Yes. I understand where you are here.
 24 I couldn't remember exactly how long I was the
 25 lead designer for and the development of things
 6

1 impression that that was all I did for a long
 2 period. I sort of wanted to just clarify that
 3 slightly.
 4 Q. What would you say to the suggestion that to the
 5 High Court you were seeking to emphasise or
 6 maximise the extent, importance and duration of
 7 your role, whereas to the Inquiry you're seeking
 8 to reduce or minimise it?
 9 A. That wasn't on -- that wasn't on my mind when
 10 I made that change.
 11 Q. So was it you remembered, after 2019, that it
 12 was only for a few years that you were the lead
 13 designer?
 14 A. That's fair, yes.
 15 Q. Can we take the left-hand witness statement down
 16 and just look at paragraph 7 of the right-hand
 17 witness statement, please. You say:
 18 "Between December 2009 and March 2010 I was
 19 a full-time Problem Manager/Operational Manager
 20 of the SSC, responsible for the management of
 21 incidents through the whole support process."
 22 That wasn't the ultimate head of the SSC; is
 23 that right?
 24 A. That's correct.
 25 Q. Who was, at this time, December 2009 to March
 8

1 2010, the head of the SSC, the manager?
 2 A. Tony Little.
 3 Q. So had Mr Peach left by then?
 4 A. Yes, I'm not sure exactly when Mr Peach left.
 5 But, I mean, effectively, when Tony Little took
 6 over, I acted in the problem/incident management
 7 role for him while he was trying to concentrate
 8 on other parts of the SSC.
 9 Q. Was Mr Little previously a member of the SSC?
 10 A. No, he wasn't.
 11 Q. Where was he brought in from?
 12 A. It was another part of Fujitsu. I can't
 13 remember now exactly what his previous job title
 14 was.
 15 Q. Was this always an interim role until the
 16 appointment of the manager of the SSC had been
 17 made?
 18 A. No, I don't believe it was. I believe --
 19 I mean, I don't know the intention behind
 20 whoever bought Tony in but there was nothing
 21 originally which suggested it was of
 22 a short-term nature.
 23 Q. In the event, it did turn out to be of
 24 a short-term nature because in March 2010 you
 25 took over as manager of the SSC?

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1 Q. That was third line, okay. So you were inside
 2 what became Fujitsu from almost the very start
 3 of the Horizon project?
 4 A. Indeed, yes.
 5 Q. To whom were you providing third line support
 6 from July '97, until the end of rollout in 2000?
 7 A. Sorry, do you mean -- I mean, we were providing
 8 support for the Horizon service to the Post
 9 Office.
 10 Q. So there was no other project in which you were
 11 engaged? You were full time on that?
 12 A. Yes.
 13 Q. In that time, what's your recollection of the
 14 nature and extent of the faults that were
 15 reported to you?
 16 A. Very little, to be honest, after all these
 17 years. I couldn't relate to you any particular
 18 faults. I would say it was a busy job, which
 19 is -- I would expect to have been normal for the
 20 rollout of a new system.
 21 Q. Can you recall whether the, I'm going to call it
 22 birth of Horizon was particularly problematic or
 23 regarded as particularly problematic within
 24 Fujitsu?
 25 A. I don't remember anybody using terms like that,

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1 A. Correct, yes.
 2 Q. We can see that if we scroll down to
 3 paragraph 8, please?
 4 "In March 2010 I became the manager."
 5 Yes?
 6 A. Yes, indeed.
 7 Q. You remained in that position as manager of the
 8 SSC from March 2010 until you retired in
 9 December 2019?
 10 A. That's correct, yes.
 11 Q. Yes, we can take that witness statement
 12 down. Yes, we can take that witness statement
 13 down.
 14 You tell us in your evidence that your first
 15 working contact with what became Horizon, it was
 16 then known as Pathway, was way back in July
 17 1997; is that right?
 18 A. '87? No.
 19 Q. '97. Did I say '87?
 20 A. I believe so, but it was '97.
 21 Q. You were then working as a support consultant in
 22 the SSC?
 23 A. Yes, that's correct.
 24 Q. Were you providing first line support then?
 25 A. No, that was third line support.

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1 no.
 2 Q. So it was just another IT system no greater or
 3 fewer faults than might be expected?
 4 A. Correct, yes.
 5 Q. Can we look, please, at WITN04600100.
 6 That's the wrong reference: WITN04600104.
 7 Thank you. You'll see that this document is
 8 entitled "Schedule of Corrective Actions [for
 9 the] CSR+ Development Audit". Does that
 10 description of the CSR+ development audit ring
 11 any bells with you now?
 12 A. The -- I remember the term CSR+ but not the
 13 development audit, no.
 14 Q. Now, if we just scroll down we can see the
 15 distribution list and we can see that you're not
 16 on it. I'm not going to suggest that you saw or
 17 reviewed this document at the time. If we just
 18 look at the "Abstract" at the top of the page,
 19 it describes accurately what the document is:
 20 "This document presents the Observations and
 21 Recommendations resulting from the referenced
 22 Internal Audit(s) along with the agreed
 23 corrective action, the action owner, and the
 24 date by which the action is to be complete.
 25 A status field is included for quick reference

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purposes."

Can we look at page 9, please, of the document. The document is presented in this sort of spreadsheet format and there are a series of issues which are called "Reported Observations" and then a recommendation for each of them, and then in the right-hand column what has been agreed in terms of the action to be taken and a commentary on that.

Can we just look at the reference against 4.2.1. It reads:

"The audit identified that EPOSS continues to be unstable. PinICL evidence illustrated the numbers of PinICLs raised since the 1998 Task Force and the rate of their being raised.

"The EPOSS Solutions Report [then there's a reference back to it] made specific recommendations to consider the redesign and rewrite of EPOSS, in part or in whole, to address the then known shortcomings. In light of the continued evidence of poor product quality these recommendations should be reconsidered."

Thinking back to that three-year, or so, period that you were working in the SSC, whilst

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Horizon was being rolled out, essentially, tested and rolled out, between July '97 and, say, mid-2000, did you know that there had been an audit that had identified that the EPOSS system was unstable.

A. I don't remember now being aware of that, I would have thought I would have heard something quite honestly. But it's not in my memory.

Q. Is that because you would have thought you would have heard something because the correct functioning of EPOSS is essential to the correct functioning of the system as a whole?

A. Yes, yes.

Q. EPOSS is absolutely fundamental to this system?

A. Yes, indeed.

Q. Again, can you remember whether you knew that an EPOSS report had recommended consideration of a redesign and rewrite of EPOSS, either in whole or in part?

A. I have no specific memory of that.

Q. That would be quite a big issue, wouldn't it?

A. I would agree, that would be a big issue, yes.

Q. A total rewrite of EPOSS?

A. Would be a considerable amount of work, yes.

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Q. Did you know by May 2000 -- ie the date of this report, so we're well into rollout now -- that the recommendation was that the earlier taskforce report and its recommendations to rewrite in whole or in part should be reconsidered?

A. I wasn't aware of that, no.

Q. If we go over to page 10, please, and look at the bottom right-hand box. The one dated 10 May, I think:

"Following response received from MJBC: 'As discussed this should be closed. Effectively as a management team we have accepted the ongoing cost of maintenance rather than the cost of a rewrite. Rewrites of the product will only be considered if we need to reopen the code to introduce significant changes in functionality. We will continue to monitor the code quality (based on product defects) as we progress through the final passes of testing and the introduction of the modified CI4 codeset into live usage in the network. PJ can we make sure this is specifically covered in our reviews of B&TC test cycles. Closed.'"

Did you know that the quality of the EPOSS

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code based on what were described as product defects, was supposed to remain under review during the introduction of the modified codeset into live usage in the network?

A. I wasn't -- I can't remember that, no.

Q. We heard last week from Mrs Anne Chambers, she told the Inquiry that she would have expected this monitoring to have been done by the leaders of the SSC team. You were, I think, the deputy team leader in the month we're looking at here, May 2000. Did you know that a monitoring exercise should be undertaken?

A. I don't remember a monitoring exercise but I would have expected that to have been done just as much by the service managers, development team and the SSC. So I wouldn't have thought it was just purely an SSC function.

Q. You said -- you gave three people there --

A. I did.

Q. -- three bits of the organisation --

A. Yes.

Q. -- that you would expect to do the monitoring --

A. Yes.

Q. -- one of whom was SSC?

A. Correct.

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1 Q. Starting with SSC, can you remember whether, in
2 fact, any such monitoring of product defects
3 with the EPOSS code --
4 A. I don't remember that monitoring being done.
5 Q. Right. The other two, I think you said service
6 managers --
7 A. Service managers, yes, and also development.
8 Q. Just dealing with the service managers, who were
9 you referring to in your description of service
10 managers?
11 A. There is a Service Management Team who each
12 manage particular aspects of -- or each manage
13 particular aspects of the service, so whether it
14 was data centre service or counter service, or
15 whichever, there would be specific service
16 managers for those areas.
17 Q. So which of those would you, if this
18 recommendation was -- or this decision was to be
19 carried into effect, to have been doing the
20 monitoring?
21 A. I would have thought if there was a major
22 recommendation like that, they would have
23 probably just picked a specific person and asked
24 them to get on with it. I can't remember which
25 part -- what the official name was of the

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1 reported to you that may be concerned with or
2 an investigation is concerned with the EPOSS
3 code, log it, pass it to the deputy manager, [to
4 you], or [by now you], the manager"?
5 A. That would be one way of approaching it, yes.
6 I don't remember that being done in this case.
7 Q. Can you remember anything at all about any
8 ongoing monitoring by any person at all within
9 Fujitsu of defects in the code for the EPOSS?
10 A. At any time or at this time?
11 Q. At this time and, I don't know, for six months,
12 a year or two afterwards?
13 A. I don't remember that, no.
14 Q. You see, Mr Parker, there's been a taskforce set
15 up into EPOSS in 1998 which recommends a total
16 or partial rewrite of the system. This review
17 in May 2000 said "You should reconsider,
18 Fujitsu, that recommendation", and the decision
19 was "Don't do that, we're going to do it through
20 ongoing monitoring". I'm trying to find out who
21 was going the ongoing monitoring?
22 A. I understand. I can't remember. No, I'm sorry,
23 I just can't help you with that. I don't
24 remember that going on.
25 Q. Would you agree that a fundamental problem with

19

1 service manager who would look after the counter
2 aspects of the service.
3 Q. You mentioned the development team, that they
4 would or might also have a role --
5 A. Yes.
6 Q. -- in carrying a decision like this into effect?
7 A. Yes.
8 Q. Why would they have a role in carrying
9 a decision like this into effect?
10 A. Because they would be seeing the incident,
11 incidents being forwarded to them from the SSC.
12 They would also see the actual incidents coming
13 in to them from the test teams looking at
14 testing the actual, like, EPOSS code.
15 Q. Wouldn't the obvious repository for a decision
16 like this to be carried into effect be the SSC?
17 A. I wouldn't have said so, no.
18 Q. Why not?
19 A. Because a particular project like that would
20 probably require a separate person to actually
21 concentrate on that, rather than the ongoing
22 incident load on the support chain.
23 Q. But could not a decision like this be carried
24 into effect by saying to everyone in the SSC,
25 "If you see a defect, if you have a defect

18

1 the functionality of the EPOSS code is something
2 that should have been monitored?
3 A. Yes, I would, yes.
4 Q. Okay, can we turn, then, to -- that can come
5 down, thank you -- the lines of support that
6 were available, just to get these out there on
7 the transcript. You tell us on page 4 of your
8 Inquiry witness statement, from paragraph 13
9 onwards, about each of the four lines of
10 support, and you start at paragraph 13 with
11 first line support. Just trying to summarise
12 this, rather than reading it through, is it
13 right that, essentially for first line support,
14 there were three elements to it: two supplied by
15 Fujitsu and one supplied by the Post Office
16 itself?
17 A. Yes. I say cautiously yes, because I've
18 realised since that I have omitted one of the
19 teams from that paragraph 13, which was the
20 Incident Management Team, IMT, which was also
21 within the HSD.
22 Q. Okay. Is that a subset of the HSD?
23 A. Yes, it is.
24 Q. So far as the Fujitsu side of the house is
25 concerned, there were two elements. The Horizon

20

1 Service Desk, the HSD?

2 A. Yes, yes.

3 Q. That's sometimes called the Horizon System Desk

4 or HSH, yes?

5 A. It had various names, yes.

6 Q. And sometimes the Horizon Incident Team?

7 A. Yes. I believe that was the same as HSD, yes.

8 Q. Then the subset of it that you just mentioned

9 was?

10 A. The IMT, the Incident Management Team.

11 Q. What did the Incident Management Team do?

12 A. I have trouble now remembering their exact

13 function. I just remember the name.

14 Q. Then the second element provided by Fujitsu was

15 the Communications Management Team, you describe

16 it as, in paragraph 13.

17 A. Yes, correct.

18 Q. Sorry, you describe it in paragraph 13 as the

19 "Communications Monitoring Team"?

20 A. Yes.

21 Q. Is that a typo, should that be "Communications

22 Management Team"?

23 A. It was probably my memory rather than a typo.

24 With these sorts of acronyms, occasionally the

25 actual meaning of it gets lost in time.

21

1 elements of first line support he or she should

2 contact, if they've got an issue?

3 A. I don't know what information was given to

4 subpostmasters in terms of where to call.

5 I would have expected them to have been given

6 one number and then been onwardly routed, but

7 I don't know what the guidance was and given to

8 me.

9 Q. So if they had a discrepancy, a failure to

10 balance, for example, which of those three would

11 you expect them to either contact or be routed

12 to?

13 A. NBSC, initially.

14 Q. Why NBSC initially?

15 A. Depending upon whether it was a business issue

16 or a suspected problem with Horizon.

17 Q. How would a subpostmaster know whether their

18 discrepancy was a business issue --

19 A. They wouldn't.

20 Q. How would they know who to call, then?

21 A. Well, I can only go back to saying I don't know

22 how they were told to call in but I would have

23 expected them to have a single point of contact,

24 which then they talked to, and then it would be

25 onwardly routed appropriately.

23

1 Q. The only reason I ask is, if we just go on to

2 paragraph 15, you describe it there as the

3 "Communications Management Team" --

4 A. Right, right.

5 Q. -- and every other document I can find calls it

6 "Communications Management" rather than

7 "Monitoring".

8 A. In which case, it should be "Management Team",

9 yes.

10 Q. Okay. Then, so far as the Post Office side of

11 the house was concerned, it was the NBSC; yes?

12 A. Yes.

13 Q. You describe it back in paragraph 13 as the

14 "National Business Support Centre".

15 A. Yes.

16 Q. Again, other documents describe it as the

17 "Network Business Support Centre". Can you

18 recall, or --

19 A. I suspect now the latter is probably the

20 accurate one.

21 Q. Okay, thank you. Dealing with those three

22 elements of first line support, then, Horizon

23 Service Desk, Communications Management Team,

24 both Fujitsu and then the NBSC, Post Office, how

25 would a subpostmaster know which of those three

22

1 Q. Did you know anything about that routing, how

2 had person --

3 A. No, I didn't.

4 Q. -- would decide whether this was a business

5 issue or a software issue --

6 A. No, I didn't.

7 Q. -- or a hardware issue?

8 A. No.

9 Q. Did you ever form an impression of how

10 technically knowledgeable the average

11 subpostmaster, assistant or Crown Office

12 employee in the Post Office was?

13 A. I would just -- no, I didn't. My only thought

14 on that would be, like any -- in a population

15 that's going to actually vary wildly.

16 Q. So fairly representative of the population at

17 large?

18 A. I would have thought so, yes.

19 Q. Many of the subpostmasters who would have given

20 evidence to the Chair in Phase 1 of this Inquiry

21 last year said that, when they were speaking to

22 the Helpdesk staff, they appeared to be using

23 scripts when they spoke to them. Were you aware

24 of that practice, the use of a script by the

25 Helpdesk?

24

1 A. I was aware of that practice. I didn't ever get
 2 involved in writing of such scripts, and it's
 3 a fairly common, like -- and process within
 4 helpdesks to have a script of some sort.
 5 Q. Did you ever see any of the scripts that the
 6 Helpdesk was reading out down the phone?
 7 A. Don't remember seeing any of them.
 8 Q. Can you remember, with that in mind at all,
 9 whether what the content of the scripts was, how
 10 they worked?
 11 A. Only to the extent that I would occasionally see
 12 in incidents which came to the SSC, a clear
 13 series of questions and answers in that incident
 14 text, and I assumed those would come from that
 15 kind of a process.
 16 Q. So it would say, "Ask question A" --
 17 A. "Answer" --
 18 Q. -- "If answer is A1 then ask this"?
 19 A. Not to that extent but I would see -- you would
 20 see a series of "Ask this, answer that" within
 21 the text.
 22 Q. Who was responsible within Fujitsu for producing
 23 the scripts, to your knowledge?
 24 A. To my knowledge, I would expect it to be some of
 25 the senior technicians within the HSD.

25

1 go about its business?
 2 A. They would have a call logging system, which
 3 was, in the early days, PowerHelp; in the latter
 4 days, TfS.
 5 Q. Just dealing with those in turn. PowerHelp.
 6 A. Yes.
 7 Q. You described it as a call logging system?
 8 A. Yes.
 9 Q. To your knowledge, would that contain any
 10 scripts which HSD staff were asked or required
 11 to read out?
 12 A. It would be a logical place to put them but
 13 I don't know.
 14 Q. TfS, does the same answer apply to that?
 15 A. It does, yes.
 16 Q. You were telling me about the systems that were
 17 in place.
 18 A. Mm-hm.
 19 Q. Those were the first level, a call logging
 20 system. What other HSD systems were there?
 21 A. They would have access to the SSC's KEL system.
 22 I remember at some point in the process they
 23 also had their own Knowledge Base and I think
 24 I've been reading recently it was called HSD1
 25 but I only remember that through very recent

27

1 Q. So ie the HSD produced its own scripts for
 2 itself?
 3 A. I believe so, yes.
 4 Q. Okay. Was there any SSC involvement in looking
 5 at, amending or approving the HSD scripts?
 6 A. I can't say we never saw one but there was
 7 certainly no such process. It would be a rarity
 8 for us to see and comment on such scripts.
 9 Q. So you were seeing them almost by chance because
 10 a bit of them had been -- or the answers to a
 11 bit of them had been cut and pasted into a PEAK?
 12 A. Correct, yes.
 13 Q. In your time in the SSC, did the SSC ever draw
 14 up the scripts for HSD? So that, for example,
 15 they -- I'm sorry -- that so, for example, they
 16 ensured accuracy that was in line with the SSC's
 17 current understanding of an issue?
 18 A. I don't recall those, no.
 19 Q. Were the scripts paper based, to your knowledge,
 20 or on a computer system?
 21 A. I don't know.
 22 Q. Where would the scripts, to your knowledge, be
 23 held, ie within which department within Fujitsu?
 24 A. Within the Helpdesk within HSD.
 25 Q. What was the system or systems that HSD used to

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1 reading. And they would have access to
 2 reference kits, reference counters, in order to
 3 try out scenarios.
 4 Q. So dealing with those in turn, on what system
 5 were the KELs kept, so far as HSD was concerned?
 6 A. HSD had access to the SSC KEL, which I believe
 7 they used. Because I saw queries going through
 8 it.
 9 Q. Did they have read-only access to it?
 10 A. No, they were able to generate KELs, although
 11 the SSC would approve them and check the
 12 content.
 13 Q. Did the KELs contain any script, the KEL system
 14 contain any scripts?
 15 A. I don't remember it doing so unless the HSH
 16 generated one. I don't remember seeing scripts
 17 in the KEL.
 18 Q. To what extent did you have access to their
 19 systems, like PowerHelp?
 20 A. We were able to examine PowerHelp in order to
 21 see what had been logged in there because not
 22 all information came over the interface between
 23 PowerHelp and PEAK. I don't -- I think
 24 I probably used that a couple of times, quite
 25 rarely. That's about what I remember about

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1 PowerHelp.
 2 Q. Did HSD have access to PinICLs and PEAKs?
 3 A. I think they did, yes.
 4 Q. Were there any scripts kept on PinICLs and
 5 PEAKs?
 6 A. Not for the purposes of Helpdesk support, no.
 7 I say it that way because PEAK was also used in
 8 latter years in order to create sequences for
 9 software delivery and release management type
 10 purposes. So you would sequences of actions but
 11 they were not to do with the first line
 12 Helpdesk.
 13 Q. If I, as the investigator, now wanted to find
 14 scripts within Fujitsu, where should I look?
 15 A. I would be -- I think my first port of call
 16 would have been PowerHelp but I'm aware that the
 17 PowerHelp system is no longer in existence.
 18 Q. Where else might you look, or might I look?
 19 A. I would only be going back to people who worked
 20 at the HSD at the time to ask where they were
 21 actually kept because, as I say, I'm not sure.
 22 I would expect PowerHelp but I'm not sure.
 23 Q. You mention that they had their own Knowledge
 24 Base. To your knowledge, were any scripts kept
 25 within that Knowledge Base?

29

1 any form of remote access, however one might
 2 define that term?
 3 A. No.
 4 Q. Can we turn to the third element, the element
 5 provided by the Post Office, the NBSC. Where
 6 was the NBSC based?
 7 A. I'm not sure. I think it was Chesterfield but
 8 I'm not sure.
 9 Q. How would the HSD communicate with the NBSC?
 10 A. My assumption would be via -- I was going to say
 11 via phone calls but no, I don't know. I don't
 12 know what the linkage was there.
 13 Q. How would the SSC communicate with the NBSC?
 14 A. Generally via the HSD.
 15 Q. So you would route it back down from first to
 16 third line support --
 17 A. *(The witness nodded)*
 18 Q. -- expect Fujitsu's first line support to link
 19 it to NBSC --
 20 A. To then liaise with the NBSC, yes.
 21 Q. Did it to your knowledge, the NBSC, have any
 22 form of remote access?
 23 A. I don't believe so but I never had a lot to do
 24 with that and I don't think I ever had anything
 25 to do with that environment.

31

1 A. I don't know.
 2 Q. Did you, within the SSC, have access to HSD's
 3 Knowledge Base?
 4 A. I don't think we did, no.
 5 Q. Looking at other functions of the HSD, did it,
 6 the HSD, have any form of remote access, however
 7 one might define that term?
 8 A. No, the HSD had no remote access.
 9 Q. Turning to the second element of the Fujitsu
 10 first line support provision, the Communications
 11 Management Team, what did it do?
 12 A. As I remember, the Communications Management
 13 Team were more concerned with network issues,
 14 computer network issues.
 15 Q. What do you mean by that, computer network
 16 issues?
 17 A. Communication between computers within each
 18 outlet, between those outlets and the data
 19 centres.
 20 Q. Where was it based?
 21 A. Stevenage.
 22 Q. How many people worked in the Communications
 23 Management Team?
 24 A. I don't know.
 25 Q. Did it, the Communications Management Team, have

30

1 Q. Can we turn, then, to second line support and go
 2 forward to paragraph 17 of your witness
 3 statement, please. Thank you.
 4 You tell us that second line support was
 5 provided by the System Management Centre, the
 6 SMC, and you describe, non-exhaustively, a list
 7 of its responsibilities. Where was the System
 8 Management Centre based?
 9 A. Also Stevenage.
 10 Q. Did it, the System Management Centre, have any
 11 form of remote access, however so defined?
 12 A. Yes, they did, via --
 13 Q. What was the extent of it?
 14 A. I can't remember all of the things they were
 15 able to do but it was, as I mentioned, I think,
 16 in my witness statement, it was via Tivoli
 17 scripts, as they were called, which would
 18 perform particular actions on parts of the
 19 Horizon System.
 20 Q. What was, in general terms, the purpose of the
 21 SMC performing those functions via Tivoli?
 22 A. Just general support of the Horizon service.
 23 Q. What do you mean by "general support"? What was
 24 their access and what were they doing that you
 25 didn't do in third line?

32

1 A. The nature of the scripts they had was to
 2 perform very tightly controlled specific
 3 actions, and I can't remember a great deal of
 4 them. I can't really give you a list of those
 5 things.

6 Q. Can we turn to third line support, then, the SSC
 7 itself. That witness statement can come down.
 8 Thank you.

9 Can we look at a document, please,
 10 FUJ00120446.

11 This is the ICL Pathway "CS Support Services
 12 Operations Manual", version 2. Can you see that
 13 from the top?

14 A. I can.

15 Q. It's dated, we can see, 29 January 2001, and we
 16 can see a description of the document in its
 17 "Abstract":

18 "This is the top level procedures document
 19 describing the activities carried out by the
 20 Support Services Unit within ICL Pathway
 21 Customer Service."

22 Just on that description of support services
 23 unit, what did that refer to? Is that the SSC
 24 or is it something greater than that?

25 A. I don't remember the SSC ever being described

33

1 responsibilities of the SSC both to the lower
 2 and upper levels of support; can you see that?

3 A. I can.

4 Q. If we scroll down, please, to 4.1.1. It lists
 5 the responsibilities of the SSC to the first and
 6 second line limbs of support ie looking
 7 downwards. You'll see from number 5 that one of
 8 the SSC's responsibilities was to:

9 "Ensure that the incident is resolved within
 10 the total time allowed by the contract between
 11 the customer and Pathway."

12 So that means ensure the incident is
 13 resolved within the total time allowed by the
 14 contract between the Post Office and Fujitsu?

15 A. Yes, that's right.

16 Q. Were there any SLAs, service level agreements,
 17 that you were aware of that set out the total
 18 time allowed by the contract for the resolution
 19 of incidents?

20 A. There were targets for the resolution of
 21 incidents. I don't remember there ever being
 22 any SLAs.

23 Q. Where were the targets recorded?

24 A. I remember there being documents with them in
 25 but I couldn't point you to them immediately.

35

1 that way but, given that it's CS support
 2 services and Peter Burden wrote it, it could be
 3 describing any of the units SSC, MSC, et cetera.

4 Q. Okay, so it's a group of support --

5 A. I would assume so, yes.

6 Q. Including the SSC?

7 A. Yes, I would assume so, yes.

8 Q. I think we can see at the foot of the page, the
 9 distribution list. It was distributed to the
 10 SSC manager which by this time, January 2001,
 11 would have been you?

12 A. Not in 2001, no. That would have been Mik
 13 Peach.

14 Q. No, I'm so sorry, Mr Peach --

15 A. Yes.

16 Q. -- and you were his deputy?

17 A. Yes.

18 Q. Thank you. Can we go to page 8, please, and
 19 paragraph 4.1. If we just scroll up a little
 20 bit so we can see the heading. A little bit
 21 more, "system Support Centre":

22 "This section of the manual describes the
 23 operations and responsibilities of the SSC."

24 You'll see under the "Overview" it sets out
 25 an overview of the tasks of the SSC covering the

34

1 Q. So, even if there wasn't an SLA, there were,
 2 nonetheless, targets which placed the
 3 responsibility on the SSC to make sure that
 4 Fujitsu's contractual obligations to the Post
 5 Office were met in terms of timeliness?

6 A. In terms of timeliness, yes.

7 Q. That responsibility included responsibility on
 8 the SSC to ensure that first and second line
 9 support met such targets too, did it?

10 A. I don't remember a particular text on that but,
 11 I mean, certainly the SSC would assist first
 12 line, second line, to ensure that they could
 13 resolve their incidents, yes.

14 Q. Was the meeting of those targets an important
 15 driver to the work of the SSC?

16 A. I wouldn't describe it as an important driver.
 17 I would describe it as a means of measuring the
 18 effectiveness of the SSC, yes.

19 Q. How was it monitored?

20 A. Mik Peach actually produced statistics on the
 21 SSC's processing of incidents, and reported them
 22 back via various means, including a web-based
 23 portal.

24 Q. Reported them to whom?

25 A. It would have been reported to both -- well, it

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1 would have been reported initially into the
 2 Fujitsu structure, so the service managers and
 3 Mik's immediate superior, and the development
 4 teams, et cetera. I mean, it was a generally
 5 available measure within Fujitsu.
 6 **Q.** When you took over in 2010, did you do that?
 7 **A.** By 2010, we were relying more on the automatic
 8 generation of that information via PEAK.
 9 **Q.** Were you aware of contractual penalties for
 10 failure to meet such targets?
 11 **A.** Not targets on general incidents through the
 12 SSC. There were SLAs on other parts of the
 13 service, which the SSC would be involved in
 14 processing incidents for.
 15 **Q.** Were you aware of contractual penalties
 16 concerning those?
 17 **A.** Yes, I was.
 18 **Q.** Did they have an impact, an important impact, on
 19 the work of the SSC?
 20 **A.** They had an impact on the work of the SSC in
 21 determining priorities applied to the workload
 22 as it came in, yes.
 23 **Q.** Was there a desire to close incidents in order
 24 to meet such targets?
 25 **A.** No. I mean, we would want to close incidents

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1 **Q.** So, when you retrieved the relevant KEL, how was
 2 it used to filter out known errors, as this
 3 document describes it?
 4 **A.** By examining the text in there and matching it
 5 to the symptoms that were presented in the
 6 incident and making a technical decision,
 7 whether or not it was the same problem.
 8 **Q.** In what respect is that filtering out known
 9 errors?
 10 **A.** It would -- it's filtering out known errors in
 11 that it wouldn't be necessary then for the HSH
 12 to forward that incident through the -- upwards
 13 through the support chain. They would recognise
 14 that that incident is already known about, there
 15 is already a solution to it and, hence, they
 16 wouldn't need to actually forward it -- forward
 17 it on.
 18 **Q.** Was there, over time, a tendency by first line
 19 support to escalate issues to the SSC
 20 inappropriately when, in fact, there was a fix
 21 in a KEL?
 22 **A.** That sort of thing always happens to some
 23 degree. I wouldn't describe the HSD's
 24 forwarding as being any worse or better than
 25 like anything else. I mean, you always get some

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1 when we get to the root cause, not just in order
 2 to fulfil timescales.
 3 **Q.** If we go over the page, please, to
 4 subparagraph 7, thank you. One of the
 5 responsibilities of the SSC at 7 was to:
 6 "... create and maintain a register of known
 7 deficiencies within the Pathway system and the
 8 solution to these problems, where known."
 9 At 8, the SSC was to:
 10 "... allow HSH [which we've been calling
 11 HSD] and the SMC access to this register so they
 12 can fulfil their function of filtering out known
 13 errors."
 14 Was that obligation essentially fulfilled
 15 through KEL?
 16 **A.** Yes.
 17 **Q.** How were HSH required to use the KEL system to
 18 filter out known errors?
 19 **A.** Don't quite understand the question. I mean,
 20 the --
 21 **Q.** How would first line support use KEL to filter
 22 out known errors?
 23 **A.** In the same way that third line support would
 24 use the actual KEL, by specifying keyword
 25 searches to retrieve relevant KELs.

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1 instance whereby a previous level of support
 2 will miss a known error and fail to filter it.
 3 **Q.** Was there any pressure placed by the SSC on
 4 first line support not to escalate issues by
 5 reference to the KELs?
 6 **A.** There would be meetings where we would
 7 occasionally discuss particular issues and
 8 assist the HSH in fulfilling their filtering
 9 responsibilities. There would be -- that would
 10 be an ongoing process.
 11 **Q.** If we go down the page, please, to the SSC's
 12 responsibilities to fourth line support. It
 13 says:
 14 "The responsibilities of the SSC to fourth
 15 line support [so looking upwards] are ..."
 16 Then it sets them out over 13 subparagraphs.
 17 Paragraph 2 places an obligation on the SSC:
 18 "... to filter out all calls for which the
 19 problem is already known to the support
 20 community and for which a solution is already
 21 known or has been generated. This includes
 22 problems for which the SSC knows a resolution
 23 but has not yet incorporated the resolution into
 24 the KEL."
 25 Is that right?

40

1 A. Yes, that is right.
 2 Q. At 3, there was:
 3 "... a responsibility to retain to you
 4 duplicate incidents in the PinICL systems and
 5 ensure that when the resolved incident is
 6 received by the SSC, the duplicated calls are
 7 closed. Duplicates incidents are repetitions of
 8 an incident that has already been passed to
 9 fourth line support."
 10 Yes?
 11 A. Yes, indeed.
 12 Q. Then over the page, please, at 11. The SSC is
 13 required to:
 14 "... ensure that for any code error
 15 a probable solution is indicated prior to
 16 passing the incident to fourth line support and,
 17 wherever possible, the proposed solution has
 18 undergone limited testing."
 19 Was the SSC under pressure to avoid passing
 20 problems up to fourth line support?
 21 A. No, I mean, if we identified a new issue, then
 22 it would be passed on to the fourth line.
 23 Q. So if a problem was resolved under existing KEL
 24 guidance, that wouldn't be passed up?
 25 A. It shouldn't be, no.

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1 A. Yes, it would.
 2 Q. What would happen if the subpostmaster couldn't
 3 produce any more information or evidence?
 4 A. If the information we had was inadequate to
 5 diagnose what the problem was then that call
 6 would have to be closed but that would only be
 7 done after we've exhausted any lines of enquiry.
 8 Q. Who would be chasing those lines of enquiry?
 9 A. Occasionally I would expect the postmaster,
 10 maybe, or a Problem Manager.
 11 Q. When you refer to the Problem Manager, who are
 12 you referring to then?
 13 A. Well, it's part of the problem management
 14 process, which was used within the support
 15 chains, which is that if you get multiple
 16 incidents with potentially the same root cause,
 17 then a Problem Manager would start to collate
 18 those and progress the problem.
 19 Q. Where did the Problem Manager sit within the
 20 four lines of support?
 21 A. There would be -- the Problem Manager function
 22 would be within all of the Service Delivery
 23 Units so there would be a function for that
 24 purpose within HSH or within, like, other teams.
 25 Q. Within the SSC?

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1 Q. If there was insufficient evidence of a system
 2 fault, that wouldn't be passed up, would it?
 3 A. It shouldn't be, but I would caveat that by
 4 saying that, in some cases, we may want to talk
 5 to development about a fault in order to see if
 6 they could give us any help with ways to
 7 identify what the fault was.
 8 Q. Might that take place on an informal basis?
 9 A. It would be on an informal basis, yes.
 10 Q. But if no fault with the system could be
 11 positively identified, that would be written up
 12 as a user error, wouldn't it?
 13 A. Not necessarily user error. User error was just
 14 a categorisation.
 15 Q. If no fault in the system could be identified,
 16 what was the code for closing the incident then?
 17 Was there a code which said, "No fault can be
 18 identified but do not categorise this as a user
 19 error; the position is simply unknown"?
 20 A. Without referring to a document, I can't
 21 remember all of the closure categories.
 22 Q. If there was insufficient evidence of a fault or
 23 no evidence of a fault, would that be referred
 24 back to the subpostmaster sometimes for more
 25 information or evidence?

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1 A. Problem management would also happen within the
 2 SSC, yes.
 3 Q. That's a different issue. Problem management
 4 may also happen within the SSC, that's small
 5 "p", small "m".
 6 A. Yes, understand.
 7 Q. You were referring to the Problem Manager which
 8 I interpreted to mean a capital "P" and
 9 a capital "M". Was there a person within each
 10 of the four lines of support who was called
 11 a Problem Manager?
 12 A. I can't be sure because the theory is the
 13 problem can be raised by, like, anybody. So
 14 there's a problem initiator within the process.
 15 I can't -- I think the Service Delivery Managers
 16 just also performed the function of Problem
 17 Manager. So, I mean, that was certainly true in
 18 my case: as a Service Delivery Manager for the
 19 SSC, I would also occasionally take on the role
 20 of a Problem Manager.
 21 Q. You're talking there about collecting or
 22 collating, bringing together into a basket
 23 a series of problems of the same or a similar
 24 nature.
 25 A. Correct.

44

1 Q. You said occasionally you would do it.
 2 A. Correct, yes.
 3 Q. Was there a systematic and/or written policy
 4 that prescribed how this would be done?
 5 A. Yes, there was.
 6 Q. How would it be done, then? You get a PinICL
 7 that is escalated or a PEAK that's escalated to
 8 SSC?
 9 A. Yes.
 10 Q. The first one that they've seen.
 11 A. Yes.
 12 Q. It's dealt with by SSC diagnostician number 1,
 13 on their shift. A week later another one comes
 14 in to diagnostician 2. Another problem comes in
 15 to HSH, doesn't get escalated for one reason or
 16 another. Week 4, a problem of a same or similar
 17 nature comes into diagnostician 4. How are they
 18 all collected together in a basket? What was
 19 the system for linking them?
 20 A. Within the SSC, it would be recognised by the
 21 fact a KEL has been raised with an incident
 22 reference on it, and then any -- as further
 23 incidents come in, which reflected the same
 24 KEL --
 25 Q. Hold on. That assumes that the problem that

45

1 A. Mm-hm.
 2 Q. How is that linked to what happened the week
 3 before?
 4 A. By virtue of searching the KEL and finding the
 5 information on there.
 6 Q. How does one search a KEL or the KEL system?
 7 A. You use technical knowledge to define
 8 a series -- one or more keywords which describe
 9 the problem and then put those into the KEL
 10 system, and they may be combined with -- the
 11 various terms can be combined together that they
 12 should all be present or just some of them
 13 present. The system would return a series of
 14 matching KELs in a priority order of how well
 15 they matched the criteria and then the
 16 diagnostician would then look and examine each
 17 one further to see if it matches the incident
 18 they are working on.
 19 Q. We can take the document down from the screen.
 20 Thank you.
 21 We're going to hear some evidence from
 22 Mr Peach, Mik Peach, next week, assuming he
 23 gives evidence in accordance with his witness
 24 statement, that the KEL system was written
 25 primarily by you; is that correct?

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1 you're confronted with is a known error.
 2 A. If it's got as far as the SSC, then we would
 3 have raised a KEL for an incident, even if we
 4 hadn't necessarily been able to get to the
 5 bottom of it.
 6 Q. So Known Error Logs were raised in respect of
 7 unknown errors?
 8 A. Where we could say -- yes, yes.
 9 Q. So were they called "Unknown Error Logs"?
 10 A. No.
 11 Q. So what was the effect of raising an unknown
 12 error on a Known Error Log, then?
 13 A. The effect would be to allow visibility of the
 14 fact this problem has happened before, the steps
 15 taken.
 16 Q. So in my example, week one, diagnostician one,
 17 gets a new error that hasn't been seen before.
 18 They create a KEL for that, do they?
 19 A. *(The witness nodded)* After investigation, yes.
 20 Q. Yes. And they can't find what the fault is --
 21 A. Yes.
 22 Q. -- and the incident is closed?
 23 A. Yes.
 24 Q. Week 2, somebody calls in with what is, in fact,
 25 the same or a similar problem.

46

1 A. Yes, it is.
 2 Q. So you wrote the code for it, did you?
 3 A. I wrote the code for it until other people took
 4 over later on. So I think currently, and
 5 certainly while I was managing the unit, John
 6 Simpkins enhanced the KEL and it was -- it
 7 wasn't just me. I mean, other people provided
 8 parts of the development effort for the KEL at
 9 various times.
 10 Q. You mentioned, essentially, a search function
 11 within it --
 12 A. Yes.
 13 Q. -- that would return a series of hits --
 14 A. Yes.
 15 Q. -- essentially on relevance grounds.
 16 A. Yes.
 17 Q. Is that right?
 18 A. Yes.
 19 Q. Was what was searched the entirety of the text
 20 of the KEL --
 21 A. Um --
 22 Q. -- or was it the subject line or the summary
 23 line?
 24 A. No, it was the entirety of the text.
 25 Q. So every single word on the KEL, there was

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1 essentially a free text search of all of those
 2 KELs?
 3 **A.** I'll clarify that slightly. It was a free text
 4 search of the symptoms, the problems and the
 5 solution. There were certain fields on there
 6 like release number or other specific criteria
 7 like that, which I don't -- which were not part
 8 of the free text search.
 9 **Q.** Was there any system of auditing or monitoring
 10 to ensure that information recorded on a KEL was
 11 accurate and enabled future free text searching
 12 to occur appropriately?
 13 **A.** There was when the KELs were created outside the
 14 SSC. So the SSC would perform an approval
 15 function when a KEL had been written outside the
 16 SSC. Within the SSC it would just be
 17 discussions amongst peers about "You raised this
 18 KEL, I would suggest this wording change",
 19 et cetera.
 20 **Q.** The Inquiry has heard some evidence that not all
 21 problems that were called in were, on searching
 22 the KEL system, returned by the -- or matched
 23 with the appropriate KEL and that, where there
 24 were KELs in place, these were not always
 25 spotted by those who were handling the PinICLs

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1 **SIR WYN WILLIAMS:** I can indeed.
 2 **MR BEER:** Thank you. Mr Parker, we were going to
 3 look at some example KELs to see the system
 4 operating in practice. Can we start, please,
 5 with FUJ00059025. Thank you. This is a KEL
 6 which advised on how to reboot and reload
 7 a counter. You can see that it was raised by
 8 a Pat Carroll on 15 June 1999 and was last
 9 updated by you on 28 January 2004.
 10 If we just look at the "Problem":
 11 "Counters are being rebooted or reloaded by
 12 switching off the base unit and this may
 13 prejudice the integrity of the messages held on
 14 the counter making the possibility of
 15 an altogether more serious and resource
 16 consuming failure greater."
 17 Now, the Inquiry has heard evidence so far
 18 of subpostmasters being advised to reboot as
 19 a response to their suggestion that they think
 20 that there is a problem with the system, which
 21 is causing a discrepancy in data. Was that
 22 advice that you knew was given, just switch the
 23 system on and off again or reboot the system?
 24 **A.** To my mind, they are two different things,
 25 rebooting the system, I would have expected the

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1 or the PEAKs. Did anyone ever examine how the
 2 KEL system was operating in practice?
 3 **A.** We certainly didn't do any monitoring of how
 4 the -- ongoing monitoring of how the KEL system
 5 was working in practice. We would expect that
 6 if somebody found, or a KEL that they had
 7 a problem with, they would either change it
 8 themselves and we would approve it, or they
 9 would contact us to have a KEL changed.
 10 **Q.** Were KELs accessible to the Post Office?
 11 **A.** No.
 12 **MR BEER:** Thank you.
 13 Sir, that would be an appropriate moment to
 14 take a break before we look at some example KELs
 15 to see the system working in practice.
 16 **SIR WYN WILLIAMS:** All right, what time shall we
 17 start again?
 18 **MR BEER:** 11.30, please.
 19 **SIR WYN WILLIAMS:** All right, that's fine.
 20 **MR BEER:** Thank you, sir.
 21 **(11.15 am)**
 22 **(A short break)**
 23 **(11.30 am)**
 24 **MR BEER:** Sir, good morning, can you see and hear
 25 me?

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1 Control Alt Del method to be used because that
 2 is a tidy way of doing it. I wouldn't have
 3 expected people to just turn on and turn off
 4 base units because there are some risks inherent
 5 with any computer system if you do that.
 6 **Q.** This records counters being rebooted or reloaded
 7 by switching off the base unit?
 8 **A.** Yes, it does, yes.
 9 **Q.** That's the wrong thing to do, is what you're
 10 saying?
 11 **A.** Yes.
 12 **Q.** It says that this may prejudice the integrity of
 13 messages held on the counter. In what way might
 14 it prejudice the integrity of messages held on
 15 the counter?
 16 **A.** Simply turning off a computer system with
 17 a spinning disk-drive in it can cause failures
 18 in the disk storage.
 19 **Q.** So, essentially, this KEL is saying that some
 20 subpostmasters were rebooting in a way that
 21 would cause new problems or could cause new
 22 problems?
 23 **A.** Which could cause new problems, yes.
 24 **Q.** What would the "altogether more serious and
 25 resource consuming failure" be?

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1 A. I don't remember exactly why that sentence or
 2 that ending of the sentence is on there. My
 3 interpretation of it is you would get a symptom,
 4 which was known as a CRC error which was a disk
 5 error, which could prevent the application from
 6 working. It would -- in fact, I believe, if
 7 I remember correctly, it would stop it dead.
 8 Q. So a total shutdown?
 9 A. It wasn't a total shutdown but the underlying
 10 system would just stop.
 11 Q. Is that the altogether more serious issue that's
 12 referred to, do you think?
 13 A. That's all I can assume. As I say, I don't
 14 remember the exact reason that final part of the
 15 sentence was put on there.
 16 Q. So presumably, given the contents of this KEL
 17 that message would have been passed out to all
 18 subpostmasters who were using Horizon, "Don't
 19 reboot or reload your system by switching off at
 20 the base unit; always reboot using control, alt,
 21 delete keys?"
 22 A. I would expect that to have happened, yes.
 23 Q. How would your expectation have been carried
 24 into reality? This KEL is sitting within the
 25 SSC, saying, "This is the problem, this is what

53

1 Q. Where would we find a record of that? Because
 2 there's nothing on this KEL to suggest --
 3 A. Understand.
 4 Q. -- that happened.
 5 A. Mm.
 6 Q. Where would we find evidence?
 7 A. I don't know how the service managers recorded
 8 that kind of thing.
 9 Q. When you say, "The service managers" who are you
 10 referring to there?
 11 A. There were a number of service managers
 12 responsible for different parts of the Horizon
 13 service and they were within Fujitsu, and so we
 14 would have -- it would have been via one of them
 15 that that information was actually relayed to
 16 the Post Office.
 17 Q. We've got on this Pat Carroll and you?
 18 A. Yes.
 19 Q. How would these service managers have learnt
 20 from this KEL that that's what they needed to
 21 do?
 22 A. We -- a member of the SSC, probably Mik, would
 23 have gone to see them.
 24 Q. So Mik would -- when you say gone to see them,
 25 spoken to them, emailed them, or seen them

55

1 happens if the subpostmaster does the wrong
 2 thing". How would that -- these words in the
 3 KEL get translated into an estate-wide message
 4 to subpostmasters?
 5 A. My recollection is sketchy but I believe this
 6 particular problem was notified directly to the
 7 HSH in order to ensure they were giving out that
 8 particular advice. I'm not sure exactly how it
 9 was communicated to the Post Office because that
 10 wouldn't have been something I was involved in.
 11 Q. Who would have been involved in it? You've got
 12 a KEL that's saying there's a problem here, and
 13 there are serious consequences for
 14 subpostmasters if they do something. What was
 15 the system to ensure that they didn't do that
 16 something?
 17 A. I would expect that either the SSC on raising
 18 the KEL would have told one of the service
 19 managers responsible for that part of the
 20 service and that would have then been like
 21 onwards -- onward communicated as appropriate to
 22 the Post Office, is one route. The other would
 23 be direct contact from HSH on to the Post
 24 Office. I would expect the former to have been
 25 more likely.

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1 face-to-face?
 2 A. Probably seen them face-to-face. They were
 3 mainly based in the same building.
 4 Q. What I'm trying to uncover is what was the
 5 system for communicating known faults with
 6 Horizon back to the subpostmaster community?
 7 A. We had no means to -- we had no means to do
 8 that.
 9 Q. Did anyone, to your knowledge, in your 22 years
 10 in the SSC, think there's an issue with that?
 11 There's a problem with that?
 12 A. If there was a serious problem, then it would go
 13 via problem managers to the Post Office. If it
 14 was a minor issue, then the existence of the KEL
 15 would be recognised by HSH when postmasters
 16 called in and the guidance would be given
 17 directly to them at that time.
 18 Q. That's after the problem has occurred?
 19 A. It is. Yes.
 20 Q. That's no good, is it?
 21 A. It is -- for minor incidents, I think it is
 22 adequate. For major things, no, but it would
 23 have then gone via problem managers.
 24 Q. Where does this sit in your spectrum of minor to
 25 major?

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1 A. If -- and I don't remember whether the turn off
 2 at counter advice was being given by HSH. If it
 3 was being given by the Helpdesk then I would
 4 consider it to be a major problem.
 5 Q. Was there any record kept or system operated
 6 that said "We've got a problem that we've
 7 identified here in the SSC, there needs to be
 8 the following contact with the following parts
 9 of Fujitsu or the Post Office to ensure that the
 10 right people know to cascade a message back to
 11 subpostmasters. We are not going to do it on
 12 this occasion because it's a minor problem. We
 13 are going to do it on this occasion because it's
 14 a major problem"?
 15 A. That would go via service managers.
 16 Q. The service manager here is somebody in the SSC?
 17 A. No, it's an external group -- no, sorry,
 18 external is wrong -- external to the SSC,
 19 internal to Fujitsu, group of people who had
 20 responsibility for various parts of the service.
 21 Q. So to take this one as an example, which part of
 22 the system or service did this concern and to
 23 which service manager should this have gone?
 24 A. This bit of advice concerns the counter.
 25 I cannot remember which service manager that

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1 Invalid Node ID event is caused from an incoming
 2 message arriving from a neighbour and Riposte
 3 detecting that node ID is invalid. The
 4 subsequent event 'network message received from
 5 an unknown source' is likely to refer to the
 6 same message. Mark has spoken with Escher
 7 regarding this problem."

8 Just stopping there, the "Mark" referred to
 9 there, would that be Mark Jarosz?

10 A. I would think so. He was generally the person
 11 who would speak directly with Escher at this
 12 time, yes.

13 Q. "His understanding is that isolated occurrences
 14 of this event (that is not once per message
 15 received from the Correspondence server), are
 16 likely to be caused by a bug in Riposte.
 17 Unfortunately without a reproducible case it is
 18 very difficult to progress this problem. His
 19 ..."

20 Would that be Mark's recommendation?

21 A. That would be my assumption yes.

22 Q. Rather than Escher's?

23 "... is that we do not pursue any attempts
 24 to reproduce this problem with Riposte 5.4 ..."

25 That is a release, is it?

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1 was.

2 Q. So was there a record kept in the SSC to say,
 3 "We've passed this on to service manager X or
 4 service manager Y for cascading", as I call it?

5 A. That would be potentially recorded in SSC period
 6 reporting.

7 Q. What is SSC period reporting?

8 A. That is reporting live generated on a monthly
 9 basis to service managers and other parts of the
 10 Horizon environment on the activities of the
 11 SSC.

12 Q. So like a performance report?

13 A. There was performance data in there, yes.

14 Q. Can we move on, please, to FUJ00058645. You'll
 15 see that this is a KEL and appears to be
 16 concerning an early issue with a Riposte bug.
 17 The KEL was raised by Bob Foster on 4 July 2000
 18 and was last updated by you on 28 September
 19 2000.

20 You'll see from the "Problem" that a person
 21 called -- well, let's read it:

22 "This message relates to the Riposte
 23 programs node identifier which identifies the
 24 counter within that office ie node:1 for the
 25 gateway node:2 for counter 2 and so on. The

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1 A. It is.

2 Q. "... rather, we wait to see if it still happens
 3 with Riposte 6 ..."

4 That's another release?

5 A. It is.

6 Q. "The two reasons for this recommendation are (1)
 7 The connection protocol has changed
 8 significantly at Riposte 6 and hence so has
 9 maintenance of connection state. Therefore the
 10 problem may have been solved. (2) The
 11 relatively low frequency of an occurrence, [less
 12 than] 10 per day, is mostly benign. Mark will
 13 review the provision of additional diagnostics
 14 information in Riposte 6 with Escher to
 15 facilitate diagnosis of problems with connection
 16 state."

17 So would it be right that the effect of this
 18 bug was that messages could be discarded?

19 A. I don't remember enough about it. I was never
 20 a counter specialist, so I can't really give you
 21 any good technical detail on that.

22 Q. Reading or rereading the problem there, can you
 23 tell from that that one of the consequences of
 24 the bug appear to be the discarding of messages?

25 A. I can't be sure.

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1 Q. Scrolling down to "Solution":
 2 "These events" --
 3 A. *(The witness laughed)*
 4 Q. -- "indicate that a message has been discarded."
 5 A. Right.
 6 Q. "Advice from Mark Jarosz is that given the small
 7 number of messages are being discarded we should
 8 treat this event in the same manner as the
 9 'network message from an unknown source'. That
 10 is relatively benign but we need to solve it
 11 should it be seen at Riposte 6."
 12 So, looking at that, it would seem that the
 13 effect of the bug was the discarding of
 14 messages; yes?
 15 A. That's what it says indeed.
 16 Q. It's described as relatively benign. Do you
 17 know what that means?
 18 A. I can only assume that -- my assumption from
 19 that would be that, because of the -- that some
 20 messages are just not important to the operation
 21 of the system. So, therefore, some of them
 22 being discarded may be relatively benign.
 23 I can't really help you, like, any more than
 24 that.
 25 Q. The "Evidence" section at the foot of the page:
 61

1 would see more issues from.
 2 Q. So essentially a wait and see approach was being
 3 taken. This was essentially a problem for
 4 Escher, "Let's see whether their release fixes
 5 it"?
 6 A. That's my reading of it, yes.
 7 Q. Was the SSC and Fujitsu, more generally,
 8 significantly reliant on Escher?
 9 A. For the Riposte messaging part of the service,
 10 yes.
 11 Q. Was the Riposte messaging service a critical
 12 element of the system?
 13 A. Yes.
 14 Q. Was that a source of frustration?
 15 A. No, I wouldn't -- I wouldn't describe it that
 16 way. Any issues that needed to be communicated
 17 to Escher would go via Mark to Escher and we
 18 would get answers back. So I wouldn't describe
 19 it as a -- something that was particularly
 20 frustrating.
 21 Q. Did it limit the ability of the SSC to
 22 understand the root causes of any bugs because
 23 such knowledge was vested in Escher?
 24 A. No, Escher -- yes. Sorry, Escher would give us
 25 information when requested, they gave us
 63

1 "None required for CI3 counters. Should
 2 this occur in a data centre or CI4 counter then
 3 please raise a call with the SSC and obtain
 4 event logs from the system reporting the error."
 5 So is that saying only raise calls in the
 6 case of CI4 counters?
 7 A. It is, yes.
 8 Q. What would happen to the CI3 counters, then?
 9 A. Then the inference here is that no calls would
 10 be forwarded to us for seeing the same thing on
 11 a CI3 counter.
 12 Q. So it's telling the lower levels of support for
 13 CI3 counters "Don't send them to us"?
 14 A. Yes.
 15 Q. Why was that?
 16 A. From the previous advice from Mark, that it's
 17 relatively benign, it's going to -- it's likely
 18 to be fixed or at least the nature of it changed
 19 in the next version of Riposte being delivered.
 20 I have no way of knowing the proximity of that
 21 delivery. If it was going to happen that week,
 22 then probably you're just not going to see
 23 a great deal of issues. If that release is not
 24 being delivered for six months, then it would be
 25 a -- I think it would be something which you
 62

1 training when requested. They were just another
 2 supplier into the Horizon service, really.
 3 Q. So were they, to your understanding, an open and
 4 transparent subcontractor?
 5 A. I didn't have enough dealings with them to make
 6 that judgement.
 7 Q. Were, to your knowledge in the 22 years that you
 8 worked in the SSC, there ever any problems with
 9 Escher or was it a smooth and harmonious
 10 relationship?
 11 A. I can't remember any particular -- any
 12 particular issues.
 13 Q. The Inquiry heard evidence last week from
 14 Mrs Anne Chambers that a problem with the KEL
 15 system was that service tickets would be passed
 16 to the SSC with the wrong KEL quoted on them.
 17 Was that a problem of which you were aware?
 18 A. Yes.
 19 Q. Was this escalated as a difficulty within
 20 Fujitsu?
 21 A. It wasn't escalated as a difficulty within
 22 Fujitsu but, I mean, it would be the subject of
 23 discussion between the SSC and the HSH, both to
 24 point out to them where they may have found
 25 an incorrect KEL and/or for us to improve KELs
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1 to ensure that they were much easier for HSH to
 2 find.
 3 Q. So what was done to rectify the problem with the
 4 use of the KEL system, then?
 5 A. It was an ongoing process of discussion between
 6 the various lines of support.
 7 Q. Ongoing until you retired?
 8 A. At various times, yes, I think that was probably
 9 true.
 10 Q. Did that indicate to you that there was
 11 a structural or systemic problem here?
 12 A. No.
 13 Q. Why not?
 14 A. Because --
 15 Q. The same problem comes up for 22 years?
 16 A. It's the same category of problem, it's not the
 17 same problem. I mean, the interpretation of the
 18 information on a KEL is down to the person
 19 reading it. If we found a situation where that
 20 interpretation was consistently wrong, we would
 21 fix it. We would change the KEL to ensure that
 22 it was better understood by other support units.
 23 Q. That assumes that the problem lies with the
 24 content of the KEL?
 25 A. It does. Correct.

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1 they would escalate it through the problem
 2 management process.
 3 Q. How would they know, in HSH, the extent or
 4 prevalence of an issue that was, in fact,
 5 a system problem that was the same or similar?
 6 A. From having knowledge of the KEL, associating it
 7 with a master call, hearing the postmasters or
 8 other source of information bringing up the same
 9 issue again.
 10 Q. What if all the subpostmaster could say is that
 11 "I've got an unexplained discrepancy"?
 12 A. That's such a wide explanation -- sorry, that's
 13 such a wide description of the symptoms that we
 14 would then have to go back to them and get them
 15 to describe it in greater detail, or rather the
 16 HSH or NBSC would.
 17 Q. Can we turn to paragraph 57 of your statement,
 18 please, which is on page 19. Paragraph 57, you
 19 say:
 20 "The 2nd line support groups were expected
 21 to answer any incidents with their operating
 22 remit (for example all user or known errors).
 23 They were also expected to send only one example
 24 of a suspected new software fault to 3rd line,
 25 retaining any duplicates at 2nd line for closure

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1 Q. Was that always the problem --
 2 A. No, it --
 3 Q. -- the way that the SSC were writing their KELs?
 4 A. No, that was not always the problem. It was
 5 also true that sometimes the HSH technician
 6 could be using search terms which were too broad
 7 or were incorrect.
 8 Q. Mrs Chambers also gave evidence that the SSC at
 9 third line and Development at fourth line did
 10 not always know how many branches had reported
 11 a particular problem that was the same or
 12 similar because tickets were not escalated up to
 13 the SSC; they had been stopped, intercepted at
 14 a lower level. Was that a known issue in your
 15 time at the SSC?
 16 A. It -- I wouldn't describe it as an issue.
 17 I mean, that was a function of the problem
 18 management part of the service.
 19 Q. So it wasn't a problem that the SSC didn't know
 20 the extent and severity of a problem because
 21 calls were not being escalated to it?
 22 A. The previous level of support, or the HSH, would
 23 be recording on master calls the prevalence of
 24 the same issue being logged and, if they deemed
 25 that there was a significant problem there, then

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1 once the main incident was resolved."
 2 Why was that the system?
 3 A. Because you don't want to flood third line with
 4 multiple incidents of the same sort.
 5 Q. Even though the prevalence of the same fault
 6 would be important information for the SSC to
 7 have to ascribe a seriousness or criticality?
 8 A. We could obtain that information from the line
 9 of support, which was tasked with retaining that
 10 particular type of incident.
 11 Q. Did that happen?
 12 A. Yes, it did.
 13 Q. You would look back to second line and say, "How
 14 many incidents of this nature have you got" --
 15 A. Yes.
 16 Q. -- "so we can ascribe a value to how important
 17 this is"?
 18 A. Yes. It would -- or they would occasionally,
 19 literally ring up saying, "Look, we've had now
 20 75 of these things, we see it as a major issue".
 21 Q. Wouldn't knowing the range of ways in which
 22 a suspected new software fault had occurred be
 23 relevant information?
 24 A. It may be, depending upon the type of fault
 25 being investigated, in which case we could go

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1 back to SMC, HSH, and say "Right, give us all of
2 the references for duplicate calls so we can
3 have a look through them and get extra detail
4 from them".

5 **Q.** How would you know whether asking for sight of
6 the duplicates would assist you or wouldn't
7 assist you? If you didn't have --

8 **A.** It would depend on the nature of the problem.
9 If we have analysed an incident and managed to
10 get to the root cause of it, then clearly there
11 is no usefulness in, like, analysing further.
12 If we have not got to the root cause of it, then
13 it would be worthwhile to gather details of
14 other incidents so that we could examine the
15 evidence on them to help us get to the root
16 cause.

17 **Q.** If we go forwards to paragraph 69 of your
18 statement, please, which is on page 22. Can we
19 scroll down. You say:

20 "When the root causes of problems were
21 identified, the SSC would check the Horizon
22 System for the fingerprint left by the problem
23 and identify which outlets were impacted."

24 Was that done in each and every case with
25 every bug?

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1 an impact a fault had? How would you know how
2 wide an impact a fault had without looking?

3 **A.** You wouldn't know without looking that is true.
4 On the -- a root cause analysis would tell you
5 exactly which type of service would be impacted
6 by this. By the criticality of that service,
7 you could then understand how serious this was,
8 and you could then go back and search and find
9 where that impact had been seen.

10 **Q.** Who would make the decision on whether the
11 impact on the subpostmaster community was
12 significant enough or not to investigate the
13 impact on the subpostmaster community?

14 **A.** Generally it would be a member of the SSC or
15 a service manager.

16 **Q.** Again, you referred to a service manager there.
17 That would be the person that was responsible
18 for the bit of the estate that had gone wrong?

19 **A.** Correct. And I would add that that -- I would
20 expect that service manager to be in contact
21 with and -- Post Office as well, over that
22 issue. I forgot to mention that in my previous
23 comment.

24 **Q.** Why would you expect the service manager to be
25 the person in contact with the Post Office to

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1 **A.** It would depend upon the nature of the bug. For
2 anything -- certainly for any bug with
3 a financial impact, yes.

4 **Q.** How would you know whether a bug did or didn't
5 have a financial impact --

6 **A.** By the --

7 **Q.** -- in all cases?

8 **A.** By the root cause analysis of the bug, we would
9 know that this does or does not have a financial
10 impact.

11 **Q.** The first line of paragraph 69 reads as if, for
12 all cases in which a root cause was identified,
13 the SSC would check the system to see how
14 prevalent the fault was and how many branches it
15 impacted. Was that only done in cases where
16 there was an assessment that it had a financial
17 impact?

18 **A.** I would probably revise that to say "major
19 problems". So something with a significant
20 impact to service would always be traced back to
21 determine where that impact was.

22 **Q.** You just said something with a significant
23 impact to service would always be traced back to
24 determine where that impact was. The question
25 I'm asking is: did you determine how wide

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1 make a decision on how wide an impact a fault
2 had on the live estate?

3 **A.** Because that was one of the responsibilities of
4 their role: to be liaison with a similar --
5 similarly situated representative of the Post
6 Office.

7 **Q.** Can we go back to paragraph 60, please, which is
8 at the foot of page 20. You say, "The use of
9 response codes"; can you assist us with what
10 a response code was, please?

11 **A.** A response code was the numeric representation
12 of a particular response text. So you mentioned
13 earlier user error, that would have a particular
14 number.

15 **Q.** A closure code, like 4039, whatever?

16 **A.** Yeah.

17 **Q.** You say:

18 "The use of response codes as a measure of
19 support effectiveness could also lead to
20 inappropriate response codes being used in order
21 to be 'be kind' to, or prevent contention with,
22 other lines of support. For example, 'Advice
23 after investigation' being used in preference to
24 'No fault in product' or 'Advice and [advice]
25 given'."

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1 Are you saying that people in SSC used
 2 an incorrect response code in order to be
 3 generous to their colleagues in first and second
 4 line support? Have I read that right?
 5 **A.** The use of a response code is always subjective
 6 to the person but, yes, I mean, you are right.
 7 Sometimes response codes would be used,
 8 I believe, inappropriately in order to not cause
 9 contention.
 10 **Q.** What do you mean by "cause contention"?
 11 **A.** The various lines of support would -- one of the
 12 measures of their service would be what volume
 13 of calls they managed to filter out and stop
 14 going to the next line of support, and
 15 a response code on a returning incident is part
 16 of that measure.
 17 **Q.** Were duplicates part of that measure,
 18 ie inappropriately passing up duplicates? Were
 19 they considered black marks and counted against
 20 second line support?
 21 **A.** Yes, they were.
 22 **Q.** Can we turn to the issue of remote access and go
 23 back to FUJ00120446. You remember we looked at
 24 this earlier, the operations manual dated
 25 29 January 2001. Can we go to page 14, please

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1 **A.** OSD was one of the acronyms which were used for
 2 staff in Belfast who supported the service
 3 systems and the operating systems running on
 4 them.
 5 **Q.** Looking at paragraph 5 -- sorry, I missed that
 6 last answer. So it was somebody in Belfast?
 7 **A.** That's correct, yes.
 8 **Q.** How could somebody in Belfast be present when
 9 somebody in the SSC was making a change?
 10 **A.** They couldn't. Unless they happened to be
 11 working over in the UK at the time. During the
 12 early stages of Horizon, there were a lot of
 13 people working in the UK from Belfast, setting
 14 up server systems within the building, setting
 15 up networking systems within the building or
 16 maintaining them, so I assume that's why the
 17 author mentioned them as a possibility.
 18 **Q.** Fourth line support were in the same building,
 19 were they?
 20 **A.** For some of the time, yes. Later, yes.
 21 Earlier, there was a period of time, I believe,
 22 when fourth line were still located in Feltham,
 23 when we were located in Bracknell, but that was
 24 a relatively actively short period.
 25 **Q.** What happened in practice? Was this, in fact,

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1 and look at paragraph 4.3. Under "Operational
 2 change", it records that:
 3 "The SSC has access to the live system which
 4 can be used to correct data on the system when
 5 this has been corrupted in some way. The
 6 procedure for doing this is as follows ..."
 7 It then describes a process for authorising
 8 a change, yes?
 9 **A.** Yes, it does.
 10 **Q.** If we can display that page and the next page,
 11 please. Thank you. On the right-hand page
 12 you'll see it goes up to 12. There is actually
 13 a 13th but I don't want to display three pages
 14 at once. It sets out a detailed process for
 15 each stage in the process in order to make
 16 an operational change, yes?
 17 **A.** It does.
 18 **Q.** One of the stages in the process is that at
 19 least two people must be present when making
 20 changes to the live system. Normally, these are
 21 SSC staff but can be one staff member and one
 22 person from the fourth line support unit
 23 responsible for the area in which the data
 24 change will take place, or one staff member and
 25 one OSD staff member. What's OSD?

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1 the four-eyes procedure, always done with two
 2 people from SSC?
 3 **A.** Yes, it was. The only caveat that I haven't
 4 read here is that this -- the four-eyes
 5 procedure was used for a change that was going
 6 to have a financial impact, which I don't
 7 remember you reading out in this document.
 8 **Q.** I don't think it does. If you look at 4.3,
 9 "Operational change", we've got the whole of the
 10 paragraph on the page there. Then if we go to
 11 the top of the right-hand page, it just goes
 12 straight into the procedure.
 13 **A.** Yeah. In that case, I think that's misleading,
 14 in that the four-eyes rule, two people observing
 15 a change, was for financial changes.
 16 **Q.** Whereas this describes it for any change?
 17 **A.** Yes, which I think is misleading.
 18 **Q.** Looking at number 5 on the right-hand page, it
 19 says:
 20 "The authoriser wherever possible produces
 21 a script to make the data change and test the
 22 script on the SSC reference rig prior to running
 23 it on the live system."
 24 That didn't happen, did it?
 25 **A.** It did happen, yes. It would depend on the

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1 nature of the problem and whether or not
 2 a script was appropriate.
 3 **Q.** What would determine whether a script was
 4 appropriate?
 5 **A.** What the actions are that are being taken,
 6 whether it was possible to actually run them via
 7 a script or not.
 8 **Q.** Is that why it's written "wherever possible"?
 9 **A.** I don't know. I mean, I would assume so.
 10 **Q.** The procedure then suggests that the SSC manager
 11 or SSC website controller would check
 12 e-signatures and file the OCR. Was that process
 13 honoured?
 14 **A.** I believe so, yes.
 15 **Q.** In your time --
 16 **A.** In my time --
 17 **Q.** -- was it honoured?
 18 **A.** -- no. In my time as SSC manager, we had
 19 stopped the use of e-signatures because they
 20 weren't considered to be giving us any extra
 21 accountability. So we were relying on the
 22 username/password type access, guaranteeing that
 23 it was the person who was entering a particular
 24 approval.
 25 **Q.** Looking at the left-hand side of the page, the

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1 enable staff to use these PCs to access the test
 2 rigs.
 3 "The build script for these PCs was written
 4 by OSD, but is held in the SSC. The PC build
 5 was performed in accordance with the Access
 6 Control Policy.
 7 "Access from the PCs to the live system is
 8 controlled by secure ID, uses firewalls, and
 9 an encrypted link, and conforms to the Access
 10 Control Policy.
 11 "The SSC access to the system is for two
 12 purposes:
 13 "Assist in diagnosis of problems on the live
 14 system
 15 "Correct data which has become corrupted.
 16 "In the second case, SSC staff may only
 17 correct data in response to an authorised OCR
 18 and only then when there are two or more people
 19 present."
 20 Again, this passage suffers from those,
 21 I think, defects that you mentioned earlier?
 22 **A.** I think so, yes.
 23 **Q.** Both of them. What system was in place to
 24 ensure that SSC staff in fact only accessed the
 25 live estate to correct data in response to

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1 introductory paragraph:
 2 "The SSC has access to the live system which
 3 can be used to correct data when this has been
 4 corrupted in some way."
 5 Was this procedure used only when data had
 6 been corrupted?
 7 **A.** No.
 8 **Q.** So that's slightly misleading too, then?
 9 **A.** I think it is, yes.
 10 **Q.** It was used for simple corrections?
 11 **A.** Yes, it was.
 12 **Q.** Do you know why that is, that this description
 13 of this use of remote access to make changes to
 14 data, it doesn't accurately reflect reality?
 15 **A.** I don't know why the author phrased it in that
 16 way, no.
 17 **Q.** Who was Mr Burden, Peter Burden?
 18 **A.** Pete Burden was Mik Peach's manager at the time
 19 but also the manager of other the parts of what
 20 was then Customer Service.
 21 **Q.** Can we go to page 20 and look at paragraph 4.8.,
 22 which is a third of the way down -- thank you:
 23 "All diagnostic staff in the SSC have access
 24 to the live system via PCs that are connected to
 25 a private Local Area Network. Branch panels

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1 an authorised OCR?
 2 **A.** The -- it was enforced only by process.
 3 **Q.** What does that mean?
 4 **A.** I mean, everybody was aware that that was the
 5 requirement and that whenever an OCR was
 6 approved of that nature, then they knew that was
 7 what they were required to do.
 8 **Q.** People are aware of the speed limit. That
 9 doesn't mean that they always abide by it, does
 10 it?
 11 **A.** I agree with you but I am not aware of any times
 12 that members of the SSC did not abide by that
 13 rule.
 14 **Q.** How would you know if you weren't checking?
 15 **A.** I would know by -- well, having seen the OCR and
 16 talking to the person who actually executed it.
 17 **Q.** No, that's a different issue. That's where they
 18 have used the OCR system, you know that they've
 19 used the OCR system.
 20 **A.** Correct, yes.
 21 **Q.** I'm talking about what audit or monitoring was
 22 there to see whether people accessed the live
 23 estate outside of the system that's described in
 24 13 subparagraphs here?
 25 **A.** Do you mean access the live system in order to

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1 make a financial change?

2 **Q.** Yes.

3 **A.** Okay. There is -- there were certain audit

4 points in place, which should log most cases

5 where that may happen but, ultimately, you are

6 depending on the people concerned to understand

7 the requirements and the importance of not doing

8 it.

9 **Q.** So you've got to trust that they follow the

10 process?

11 **A.** You've got to trust that they follow the

12 process.

13 **Q.** Sometimes with access to systems, an employer

14 checks whether their trust in their employees is

15 well placed or not; was that done?

16 **A.** I don't know.

17 **Q.** In your 22 years, have you any evidence that it

18 was done?

19 **A.** I remember there were various audits of the

20 processes, procedures and access carried out by

21 external auditors. But that's the only thing

22 I can actually think of.

23 **Q.** I'm talking about not an audit of the written

24 documents; I'm talking about an audit of whether

25 access to the live estate, to correct or change,

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1 made.

2 **Q.** If there was a trace left, it was therefore

3 auditable, wasn't it?

4 **A.** It would be capable of being audited. I don't

5 know, because we're talking on a hypothetical

6 thing here, whether such a thing would be in the

7 audit trail or not.

8 **Q.** In your time, were you ever aware of there being

9 an issue or concern over the extent of SSC's

10 access to the live estate?

11 **A.** There were a number of debates about access

12 rights that the SSC had at different times.

13 I think it's fair to say that it's fairly common

14 that there's an issue between what the ideal

15 security of a system is and what level of

16 security meets the actual operational needs of

17 that system. So -- and this was always ongoing

18 and it was an amicable discussion between SSC

19 and security people.

20 **Q.** Were you ever told that there was a concern that

21 SSC staff had unauditably and unrestricted

22 access to the live estate?

23 **A.** I wasn't aware of anything unauditably. I mean,

24 there was issues in the early days of Horizon

25 with the methods used to connect to counters,

83

1 in some way, financial data, occurred; in your

2 22 years, was that ever done?

3 **A.** I'm not aware of how it could be done but, no,

4 I don't recall it being done.

5 **Q.** Well, it could be done, couldn't it, just

6 outside of the process that's set out here?

7 **A.** Oh, sorry. You're saying that could a member of

8 the SSC make such a change without anybody's

9 knowledge?

10 **Q.** Yes. Answer to that, obviously yes?

11 **A.** The answer is yes, but I would caveat that by

12 saying I was never aware of any such thing

13 happening, and the nature of the people within

14 the SSC is that the chances of them being able

15 to achieve that without somebody else realising

16 there was something going on are almost nil.

17 **Q.** Why?

18 **A.** Because you're in a peer group of experienced

19 technicians who would recognise when something

20 wasn't being done.

21 **Q.** How would they see?

22 **A.** By traces within the system.

23 **Q.** What traces within what system?

24 **A.** I can't define those exactly to you because it

25 would depend upon the nature of the change being

82

1 because they weren't adequately auditable. But

2 that was worked upon and systems put in place by

3 the time network banking services came in as

4 part of Horizon.

5 **Q.** Can we look at page 31 of your witness

6 statement, please, and can we look at

7 paragraph 85 on page 31. You say in the first

8 line:

9 "One would have to concede that where the

10 SSC used Riposte tools and remote access to have

11 a positive effect on outlet information, the

12 opposite must also be possible."

13 What did you mean by that sentence?

14 **A.** What I go on to clarify in the following

15 sentence: that if some errors were made in the

16 replaying of message store transactions, then,

17 like, issues could come out of that.

18 **Q.** So you're talking there about innocent errors by

19 a diagnostician when seeking to correct a fault?

20 **A.** That's correct, yes.

21 **Q.** They themselves, in fact, creating new ones?

22 **A.** That's correct, yes.

23 **Q.** Not malign access?

24 **A.** Correct.

25 **Q.** Did the possibility of malign access ever occur

84

1 to you?

2 **A.** The possibility occurred to me, but that was
3 within the remit of the security staff. My
4 concern, as an SSC manager, was that we should
5 only have the level of access which was required
6 for our work because that protected staff as
7 much as it protected the service.

8 **Q.** Can we look back further up the page to
9 paragraph 84.2. You say:
10 "Remote counter access would be used when
11 Message Store intervention required that the
12 records being re-inserted originated from the
13 outlet counter. For context, records within the
14 Riposte message store included details of the
15 originating ..."

16 That's branch code; is that right?

17 **A.** That's correct, yes.

18 **Q.** "... and counter ID ..."

19 So that's which counter within the branch.

20 **A.** Within the branch, yes.

21 **Q.** "Some types of records (normally transactions)
22 could only be accepted by the system if they to
23 very originated from an ID within the outlet."

24 Do I understand from that that the SSC were,
25 in fact, using branch IDs in order to make

85

1 change being made where the SSC had to insert
2 data, we would attempt to market in such a way
3 that it was obvious that it was done by the SSC.

4 **Q.** When you say, "We would attempt to"?

5 **A.** It was process; it wasn't ... policed by the
6 system.

7 **Q.** Okay. So it was reliant on the operator and the
8 second pair of eyes --

9 **A.** It was.

10 **Q.** -- to use some code that left their footprint?

11 **A.** That's correct, yes.

12 **Q.** Just going back, please, to FUJ00120446, and
13 look at page 14, please, and at the foot of the
14 page, 4.3. I just want to see the bit of the
15 process here which requires them to use an SSC
16 code in a way that leaves a footprint, so that
17 it doesn't appear, on the face of the record, to
18 have been a branch and branch counter ID.
19 I don't think that's in 1 or 2, is it?

20 **A.** It's not, no.

21 **Q.** If we just go over the page, I don't think it's
22 in 1 to 5 there, is it?

23 **A.** Not that I can see, no.

24 **Q.** Then if we look at the bottom part of the page,
25 I don't think it's in 6 to 12, is it?

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1 corrections.

2 **A.** No, they were not using branch IDs. They were
3 potentially replaying transactions from the
4 counter itself.

5 **Q.** But using a branch ID in order to do so?

6 **A.** That was an effect of it being run on
7 a particular counter, those replayed
8 transactions took on that counter's ID.

9 **Q.** So would the footprint that was left show only
10 the branch user ID?

11 **A.** Unless a member of the SSC -- yes. Sorry, yes.

12 **Q.** So anyone looking back afterwards would not be
13 able to see that this correction or this access
14 was by somebody from the SSC?

15 **A.** Unless the member of the SSC ensured that there
16 was an identifier within the messages going back
17 which indicated SSC activity, which was also
18 part of our process.

19 **Q.** But doesn't what you've written here mean that,
20 in these cases, the only visible record would be
21 the originating branch code and counter ID, that
22 the involvement of the SSC in the correction
23 would not be visible?

24 **A.** That was not my intention when writing it. That
25 inference could be taken but, as I've said, any

86

1 **A.** No.

2 **Q.** Then if we go over the page to 13, it's not in
3 13, is it?

4 **A.** No.

5 **Q.** A policy that sets out, in rather elaborate
6 detail, the process by which changes were made
7 to the live estate, including where changes were
8 made to financial data, ought to set out the
9 requirement that you have just identified?

10 **A.** I would agree it should. I cannot explain why
11 it doesn't. But such requirements were in other
12 documents and, in particular, in the SSC work
13 instructions.

14 **Q.** The SSC work instructions --

15 **A.** Yes.

16 **Q.** -- ie that you must always use an SSC ID to
17 leave a footprint, I'm calling it?

18 **A.** It must always be identifiable as an SSC change,
19 yes.

20 **Q.** Can we look, please, at FUJ00088036.
21 Remembering that the document that we were just
22 looking at was 29 January 2001, we've now moved
23 forwards to 2 August 2002. You can see from the
24 title of the document and the "Abstract" what it
25 is. It:

88

1 "... describes the requirements and outline
2 design for secure operational access to Counters
3 and Servers. The design is based on modifying
4 the OpenSSH product to provide a command logging
5 facility, these logs being maintained for audit
6 purposes."

7 If we scroll down, please, we can see who
8 originated the document, who contributed to it,
9 yes?

10 A. Indeed, yes.

11 Q. We can see at the foot of the page that Mr Peach
12 was an approval authority?

13 A. Yes.

14 Q. If we go over the page, please, and scroll down,
15 we can see that you're recorded as a reviewer of
16 it?

17 A. That's correct, yes.

18 Q. Would that be accurate if it's on here that
19 you've reviewed it, you would have reviewed it?

20 A. Yes, it would.

21 Q. Can we go to page 9, please, under the
22 "Introduction" at 1.1.1:

23 "SFS mandates the use of Tivoli Remote
24 Console for the remote administration of Data
25 Centre platforms. This records an auditable
89

1 audit failures. The use of such techniques puts
2 Pathway in contravention of contractual
3 undertakings to the Post Office. After the
4 proposals in this [system outlying document]
5 have been implemented a CP ..."

6 Change process?

7 A. Yes, that's correct.

8 Q. "... will be raised to phase out TRC (or limit
9 its use to exceptional situations)."

10 Can you help us, what were the Belfast
11 Operations Centre using Rclient for.

12 A. My assumption would -- it's a method of logging
13 on to data centre servers or any other computer
14 within the system in order to perform
15 maintenance activities or diagnostic activities.

16 Q. Why were they using this unauthorised tool?

17 A. I believe it was primarily because there was no
18 approved and auditable tool that was
19 operationally good enough for them to use.

20 Q. Do you know why that was, almost two years into
21 the operation of the system?

22 A. I don't, no.

23 Q. Would you describe that as optimal or
24 suboptimal?

25 A. Suboptimal.

91

1 trail of log-ins to all boxes accessed by the
2 user. It is a matter of considerable discussion
3 and correspondence that TRC is slow and
4 difficult to administer. This has lead over
5 time to BOC personnel ..."

6 That's people in Belfast?

7 A. I assume so. I must admit, I don't remember
8 them being called BOC but --

9 Q. If you go back to page 4, please, and look at
10 the list of acronyms?

11 A. Belfast Operation Centre.

12 Q. Belfast Operation Centre.

13 A. Belfast Operation Centre, so, yes, it would have
14 been them, yes.

15 Q. Go back to page 9, please. I think I was up to:

16 "This has lead over time to BOC personnel
17 relying heavily on the use of unauthorised tools
18 (predominantly Rclient) to remotely administer
19 the live estate. Its use is fundamental for the
20 checking of errors. The tool does not however
21 record individual user access to systems but
22 simply records events on the remote box that
23 administrator access has been used. No other
24 information has been provided including
25 success/fail so it is not possible to simply
90

1 Q. The system didn't record individual user access.
2 So did that mean that what I've called
3 a footprint was not left?

4 A. Yes, it would.

5 Q. It meant that no audit was possible?

6 A. It would, yes.

7 Q. But why was it in contravention of contractual
8 undertakings to the Post Office?

9 A. I don't remember what was in the contract about
10 this kind of security.

11 Q. But would you presume that there was some
12 guarantee or undertaking or promise about the
13 security of the system. That's what's being
14 spoken of and this unauthorised and unauditable
15 approach was in breach of it?

16 A. That would be my reading of it but I don't know.

17 Q. Do you know whether the Post Office knew about
18 these breaches of contract by Fujitsu?

19 A. I don't know.

20 Q. Can we turn to the position with third line
21 support, please, and look at page 13. This is
22 under the heading "Requirements", subheading
23 "Areas of concern" and then 4.1.2, "Third line
24 support":

25 "Third line support staff receives repeat
92

1 instances of calls that should have been
 2 filtered out by second line. Handling repeat
 3 calls is not an effective use of third line
 4 support resource. The current support practices
 5 were developed on a needs must basis. Third
 6 line support diagnosticians had no alternative
 7 other than to adopt the approach taken, given
 8 the need to support the deployed Horizon
 9 solution.
 10 "The consequences of limited audit and
 11 system admin access afforded to third line
 12 support staff provide the opportunity to:
 13 "Commit fraudulent acts;
 14 "Maliciously or inadvertently affect the
 15 stability of the new network banking and Debit
 16 Card online services;
 17 "In addition a complete audit would allow
 18 Pathway to defend the SSC against accusations of
 19 fraud or misuse."
 20 This is a very serious issue that's being
 21 raised here, isn't it?
 22 A. It is, yes.
 23 Q. Why were the current support practices developed
 24 on a needs must basis?
 25 A. Because there was a necessity to support the

93

1 A. I don't remember.
 2 Q. Were you involved?
 3 A. I don't believe so, no. As I say, I have no,
 4 like, memory of that.
 5 Q. But it would have been known about by the then
 6 manager; would that be right?
 7 A. Yes.
 8 Q. Mr Peach?
 9 A. Yes.
 10 Q. The document that we've just looked at, the
 11 January 2001 document with its 13 stages, it
 12 might be read as saying, "We've got a detailed
 13 and complex process that appropriately restricts
 14 access to the live estate by SSC staff"?
 15 A. It might be read that way, yes.
 16 Q. Here, that process is being described as
 17 problematic, isn't it?
 18 A. The tools being used at the -- at that time,
 19 yes.
 20 Q. Was this information shared with the Post
 21 Office, to your knowledge?
 22 A. I don't know.
 23 Q. In your view, ought it to have been shared with
 24 the Post Office?
 25 A. Not a decision for me to make, really. I'd go

95

1 service as it was at that time.
 2 Q. Why weren't they developed on a planned,
 3 designed basis?
 4 A. I don't know. I was nowhere near the design of
 5 that part of the service.
 6 Q. Can you recall what prompted the inclusion of
 7 these paragraphs in this report? Why was it
 8 being looked at now? Was it the rollout of
 9 network banking?
 10 A. I believe so, yes.
 11 Q. Why was the rollout of network banking a trigger
 12 or a catalyst to identify the possibility of
 13 fraudulent acts, or malicious or inadvertent,
 14 affecting the stability of the system?
 15 A. I'm not sure. I remember it happening at that
 16 time but I don't remember exactly why that was
 17 necessary then, rather than not being done
 18 previously.
 19 Q. Who developed these *ad hoc* practices on a needs
 20 must basis? Presumably that was you and your
 21 colleagues within the SSC?
 22 A. Within the SSC or within the support environment
 23 in general.
 24 Q. So who developed, then, within the SSC, these
 25 *ad hoc* access practices?

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1 no further than that.
 2 Q. Can we go to page 15, please. At 4.3.2, under
 3 the heading, "Third line and operational
 4 support":
 5 "All support access to the Horizon systems
 6 is from physically secure [sites]. Individuals
 7 involved in the support process undergo more
 8 frequent security vetting checks."
 9 Was that true?
 10 A. I believe so.
 11 Q. How frequent were your vetting checks?
 12 A. I don't remember. I mean, I know I was
 13 initially vetted on joining Pathway but
 14 I wouldn't necessarily know if other vetting
 15 checks had been done.
 16 Q. To your knowledge, were you ever re-vetted?
 17 A. To my knowledge, no.
 18 Q. "Other than the above controls ..."
 19 That's secure -- a secure site and
 20 frequently vetted -- more frequently vetted
 21 individuals:
 22 "Other than the above controls are vested in
 23 manual procedures, requiring managerial sign off
 24 controlling access to post office counters where
 25 update of data is required."

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1 Is that essentially describing, in
2 a sentence, the 13 steps that we looked at in
3 the 2001 document?
4 **A.** I believe so. But not having written it,
5 I don't know what was on the author's mind,
6 really.
7 **Q.** No, that would be an unfair question to ask:
8 what was on the author's mind? But looking at
9 it, manual procedures requiring managerial
10 sign-off is essentially the steps that we looked
11 at, the 13 of them --
12 **A.** Yes.
13 **Q.** -- in the previous document?
14 **A.** Yes.
15 **Q.** "Otherwise, third line support has:
16 "Unrestricted and unaudited privileged
17 access (system admin) to all systems including
18 post office counter PCs ..."
19 When I asked you earlier whether you were
20 ever made aware of a concern that SSC staff had
21 unrestricted and unaudited privileged access to
22 all systems, you said no. Presumably, you
23 hadn't remembered this.
24 **A.** Correct.
25 **Q.** Again, in the terms of level of seriousness of
97

1 but there was audit for some things in place but
2 I can't define for you what they were. But,
3 certainly for the post office counter PCs, as
4 specified there, that is true.
5 **Q.** Skipping over the second bullet point:
6 "The current support practices were
7 developed on a needs must basis; third line
8 support diagnosticians had no alternative other
9 than to adopt the approach taken given the need
10 to support the deployed Horizon solution."
11 Remembering back, did that reflect the
12 position at the time that "We don't like this,
13 but we've got no option. We need this
14 privileged access in order to make the system
15 work"?
16 **A.** It does, yes.
17 **Q.** Did anyone ask the question, "Did anyone not
18 think of this when they were designing and
19 building the system"?
20 **A.** I don't remember such a comment, but I would
21 expect people to think, "Why?" I probably can't
22 say, like, any more.
23 **Q.** Did it, to your memory, consciously feel
24 uncomfortable?
25 **A.** No, it didn't feel uncomfortable. You got on
99

1 concern, this ranks quite highly in the
2 spectrum, doesn't it?
3 **A.** It does, if you had no trust in the staff, yes.
4 **Q.** If you trust your staff, you don't need any
5 checks at all; is that what you're saying?
6 **A.** No. But the -- having trusted, vetted staff
7 mitigates that problem to an extent.
8 **Q.** You're focusing, are you not, on malicious or
9 malign access --
10 **A.** I am, yes.
11 **Q.** -- as opposed to the leaving of a footprint for
12 audit purposes?
13 **A.** Yes, that's true.
14 **Q.** That could be examined and tested, for example,
15 in any court proceedings?
16 **A.** That's true and I would much prefer anything
17 that the SSC had to do to be auditable, yes.
18 **Q.** Does that reflect the reality in the SSC that,
19 other than locks and keys on the building and
20 what was said to be frequent or more frequent
21 security checks, other than that, the people in
22 third line support had unrestricted and
23 unaudited access to all systems, including post
24 office counter PCs?
25 **A.** I would certainly say that that applied to most
98

1 with the job with the tools you had.
2 **Q.** The document continues:
3 "There are however no automatic controls in
4 place to audit or restrict user access."
5 That, in a sentence, is describing what
6 should be in place, namely embedded automatic
7 system controls that, at the same time, restrict
8 access but also provide an audit trail
9 afterwards.
10 **A.** That would be my reading, yes.
11 **Q.** "This exposes Fujitsu ... to the following
12 potential risks:
13 "Opportunity for financial fraud;
14 "Operational risk -- errors as a result of
15 manual actions causing loss of service to
16 outlets;
17 "Infringements of the Data Protection Act."
18 Was this needs must third line support
19 access developed because of the number of bugs,
20 errors and defects in Horizon Legacy that became
21 apparent as it was rolled out?
22 **A.** No. I mean, as soon as you've got, what --
23 you've got one error which needs you to access
24 a particular component of the system, you have
25 to find a way of accessing it.
100

1 Q. How many members of staff were in the SSC from,
 2 say, mid-2000?
 3 A. I can't remember exactly but I'd say about
 4 mid-20s.
 5 Q. Did that number remain static or did it grow?
 6 A. It changed over time, up and down.
 7 Q. There were turnovers of staff?
 8 A. There were. We didn't have a massive staff,
 9 massive staff turnover, but yes.
 10 Q. This document, in terms of operational risks,
 11 describes errors as a result of manual actions
 12 causing loss of service to outlets. That's what
 13 I described earlier as an inadvertent error,
 14 rather than a malign or malicious conduct. Did
 15 Fujitsu ever explore whether this unauthorised
 16 access had destabilised the Horizon platform in
 17 any way?
 18 A. I don't know.
 19 Q. To your knowledge, did it?
 20 A. I don't remember it being done.
 21 Q. Can we go over the page to page 16, please, and
 22 paragraph 4.6, "Controlled access to sensitive
 23 data":
 24 "There are three categories of sensitive
 25 data within the Pathway solution:
 101

1 Fujitsu staff, could that only be used in the
 2 secure space at Bracknell or could it be used
 3 elsewhere?
 4 A. It could only be used within secure spaces in --
 5 around Horizon. I mean, the SSC in itself had
 6 a secure floor. I believe, but I don't know,
 7 the Belfast Operations had similar.
 8 MR BEER: Thank you.
 9 Sir, I'm about to move to a different
 10 subtopic. I wonder whether that would be
 11 an appropriate moment to break until 2.00.
 12 SIR WYN WILLIAMS: Yes, by all means.
 13 So we'll convene again at 2.00.
 14 MR BEER: Thank you very much, sir.
 15 (12.57 pm)
 16 (The Short Adjournment)
 17 (2.00 pm)
 18 MR BEER: Good afternoon, sir. Can you see and hear
 19 me?
 20 SIR WYN WILLIAMS: Yes, I can, thank you.
 21 MR BEER: Thank you very much.
 22 Mr Parker, can we pick up where we left off
 23 by looking at POL00029282. You recall we've
 24 looked at some documents on remote access from
 25 2001, 2002 and we're now moved to 2004. Can you
 103

1 "Personal data -- subject to the rules of
 2 the Data Protection Act regarding its storage,
 3 confidentiality, accuracy and use;
 4 "Business sensitive data;
 5 "Cryptographic keys/data;
 6 "None of the above sensitive data should be
 7 made available outside of the Pathway secure
 8 environment. Due to the potential sensitivity
 9 of cryptographic keys/data there is a further
 10 restriction that diagnostics can contain this
 11 data;
 12 "[Namely] It can only be reviewed by
 13 a defined group -- initially the SSC third line
 14 support group and development;
 15 "[Secondly] In a secure location --
 16 currently 6th floor in Bracknell and the secure
 17 room in FEL01."
 18 Is it right that the policy document appears
 19 to be addressing the issue of access to
 20 sensitive data by limiting the access of it to
 21 those who were within a secure room in
 22 Bracknell?
 23 A. Yes.
 24 Q. If one of the unauthorised tools, whether that's
 25 Rclient or one of the others, was being used by
 102

1 see that this document is entitled "Customer
 2 Service Operational Change Procedure". The
 3 abstract of it says that it:
 4 "... describes the procedure for Operational
 5 Changes where the changes are made to the live
 6 operation."
 7 It's dated 18 March 2004 as version 1. The
 8 contributors to it are you and Mr Peach, yes?
 9 A. Yes.
 10 Q. Does that mean that you wrote it or did Mike
 11 Stewart and/or Mik Peach write it?
 12 A. I think it was the latter, Mike and Mik would
 13 have written it. I would have just contributed
 14 ideas or suggestions.
 15 Q. I see. Can you remember what the reason for --
 16 the necessity for this document was?
 17 A. Other than ensuring that the process was
 18 correctly documented, no.
 19 Q. Did this represent a change in process or was
 20 this recording what happened?
 21 A. Without rereading the whole document, I'm not
 22 sure whether it was a change or not.
 23 Q. Can we look, maybe to help you answer that
 24 question, at page 6. Can you see from the
 25 introduction it appears to be a description of
 104

1 existing process rather than highlighting change
 2 to a process?
 3 **A.** I think that's right, yes.
 4 **Q.** Then can we go to page 7, please. You'll see
 5 that it says, in the first line:
 6 "Anyone can raise an OCP, except those who
 7 have logged onto the SSC website using the
 8 'OCPview' user."
 9 What does that mean, please? Can you
 10 remember now?
 11 **A.** When logging on to the SSC website you needed to
 12 supply a username/password and OCPview was
 13 I believe one of those usernames.
 14 **Q.** Why couldn't you raise one if you'd logged on
 15 using OCPview?
 16 **A.** My assumption is from this sentence was that it
 17 was a read-only user so that you couldn't
 18 interfere or change OCPs. I would also say that
 19 when we said earlier this is not a changed
 20 document or from the previous one, my memory of
 21 the previous one was that OCRs were raised on
 22 paper at that time, whereas this reflects the
 23 fact that they were being raised via the SSC
 24 website.
 25 **Q.** I see. I understand.

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1 monitored for errors, regression or unintended
 2 consequences?
 3 **A.** Certainly after making any change, you would be
 4 looking at the system carefully to make sure, as
 5 you say, there's no regression or adverse impact
 6 to the system. That would be standard process.
 7 That would just be due diligence, really.
 8 **Q.** That's on an individual basis?
 9 **A.** Mm.
 10 **Q.** I'm looking at -- or I'm asking about more
 11 a system-wide approach.
 12 **A.** I don't think I was aware of a system-wide
 13 approach, no.
 14 **Q.** Can we turn, please, to FUJ00138355.
 15 **SIR WYN WILLIAMS:** Mr Beer, before we do that, could
 16 we just go back to the first page, please?
 17 **MR BEER:** Yes, of course.
 18 **SIR WYN WILLIAMS:** I don't want to make any point
 19 that you're going to cover but unless --
 20 Mr Parker, if you see, just below your name and
 21 Mr Peach's, there's the heading "External
 22 distribution" and we have the name "John Bruce
 23 (Post Office Limited)". Now, I may have missed
 24 it but I don't think in the last document we
 25 looked at about these processes there was

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1 **A.** Apart from that, I doubt there's a great deal of
 2 difference.
 3 **Q.** Then if we can go to page 9, please. At the end
 4 of this section on generating an OCP, it says:
 5 "NOTE -- an OCP is raised in order to make
 6 a change to the live system. If the change is
 7 likely to affect a system build, then the
 8 relevant part of the form must be set to YES.
 9 If the change is being made to the system in
 10 order to overcome an operational deficiency
 11 which should be permanently fixed in the system
 12 code, then there MUST be a call raised to report
 13 the problem, and the call reference added to the
 14 OCP."
 15 Was there any monitoring in place at Fujitsu
 16 to ensure that those who had power to access the
 17 live system acted in accordance with this
 18 policy?
 19 **A.** There was no constraint. It was just you were
 20 expected, and to use the process. I don't know
 21 of any way that you could stop people from not
 22 using that process.
 23 **Q.** What about retrospectively? Was any audit done
 24 to ensure that any changes that were made,
 25 whether using this OCP system or not, were

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1 an external distribution at the Post Office.
 2 Have I got that right?
 3 **A.** I'm sorry I don't remember.
 4 **SIR WYN WILLIAMS:** All right, that's fine. But on
 5 this occasion, clearly there was. So that from
 6 this moment on, the Post Office were aware of
 7 this document, on the face of it?
 8 **A.** Yes.
 9 **SIR WYN WILLIAMS:** Do you know who Mr Bruce was?
 10 **A.** I remember the name but I don't know his
 11 position within the Post Office.
 12 **SIR WYN WILLIAMS:** All right. Thank you.
 13 Sorry, Mr Beer. I just wanted to follow
 14 that up slightly.
 15 **MR BEER:** Sir, yes. Can I follow up your follow-up
 16 and look at page 2 of the document, please.
 17 Scroll down, please.
 18 We can see maybe the purpose for which the
 19 document may have been shared with the Post
 20 Office, because under the bottom section of that
 21 table it says "Optional Review/Issued for
 22 Information", and, again, the name of Mr Bruce
 23 from the Post Office Limited. Can you help us,
 24 what does that "optional review" mean?
 25 **A.** When the document went out for optional review,

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1 the person may or may not return comments on it.
 2 If you were a reviewer, you had to return a no
 3 comments document.
 4 Q. I see. Was that a mandatory review?
 5 A. For a mandatory review of the document, yes, you
 6 had to return no comments.
 7 Q. So an optional reviewer, here Mr Bruce, would be
 8 sent the document but it wasn't mandatory for
 9 him to make a return?
 10 A. Correct.
 11 Q. The optional doesn't apply to whether or not the
 12 document was sent to him?
 13 A. That's correct, yes.
 14 Q. "Issued for information", is that
 15 self-explanatory, ie you're just getting this
 16 after we have written it?
 17 A. Yes.
 18 Q. Okay, thank you. Can we go, please, to
 19 FUJ00138355. This is a new species of document
 20 that we're looking at with you, it's called
 21 a WI. Can you recall what those are?
 22 A. Those are work instructions which were entered
 23 and maintained on the SSC website.
 24 Q. Can you briefly explain what the purpose and
 25 function of a work instruction is, please?

109

1 Q. I was thinking more about whether, in 2011, you
 2 would have been referencing the GDPR at all?
 3 A. Quite true, yes. I mean, that would have been
 4 too early for that, yes.
 5 Q. So we can't tell from this, the 18th edition of
 6 this document, what is your text, what is the
 7 text of those between versions 2 to 17, and that
 8 which is Mr Woodley's text in version 18?
 9 A. Yes.
 10 Q. Is that right?
 11 A. That's correct, yes.
 12 Q. Moving on a paragraph, just at the end of the
 13 first paragraph:
 14 "The responsibility for data correction is
 15 vested with the SSC although ISD sometimes act
 16 under SSC authorisation."
 17 What was the ISD?
 18 A. That was the Belfast Operations. That was
 19 another acronym used for them later on.
 20 Q. "Corrections to live system data must be
 21 authorised via account change control and
 22 auditable. Any correction requiring APPSUP role
 23 is to be witnessed by a second member of the
 24 SSC. Both names must be recorded on the change
 25 control for audit purposes."

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1 A. It was there to provide information to
 2 diagnosticians on how a particular task should
 3 be achieved or what the expectations were for
 4 standards of use.
 5 Q. Was it an internal SSC document, then?
 6 A. I think -- they were only ever raised by SSC
 7 members. I don't remember whether people
 8 outside the SSC could see them. I suspect they
 9 could.
 10 Q. But the target audience were SSC diagnosticians?
 11 A. Yes, indeed.
 12 Q. If we just read it, the title is "Data
 13 correction". It was authored, in its first
 14 version, by you. This is version 18 we're
 15 looking at. The details are:
 16 "GDPR regulations require that access to
 17 personal data remains within the European Union
 18 and PCI data security standards mandate physical
 19 security restrictions must be applied where
 20 update access is allowed to user data."
 21 Presumably you wouldn't have been writing
 22 that, is that right, in 2011?
 23 A. Yeah, don't believe those are my words. They're
 24 not my style. I probably -- I may have lifted
 25 those from a security document.

110

1 Given the documents we've looked at to date,
 2 why was this work instruction necessary?
 3 A. I think the idea was just to clarify for SSC
 4 members to make it clearer to them so that they
 5 didn't have to look at various disparate
 6 documents.
 7 Q. What would they have done between 2000, then,
 8 and September 2011 when this document was first
 9 created?
 10 A. They would have had to refer to various
 11 documents to get the overall picture, as it
 12 pertained to the SSC.
 13 Q. You see at the top it says that:
 14 "This [work instruction] is waiting for
 15 approval by Mark Wright and should not be used."
 16 A. Mm-hm.
 17 Q. Why was it, still in February 2021, waiting
 18 approval by Mark Wright and shouldn't be used?
 19 A. I don't know.
 20 Q. If you just read through it to yourself, just to
 21 refamiliarise yourself with it. (Pause)
 22 A. Okay, yes, got that.
 23 Q. If you scroll down to "Change Control". Thank
 24 you. (Pause)
 25 A. Yeah, okay.

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1 Q. Is there anything in there that you can read
2 that might explain or justify why the work
3 instruction was "awaiting approval by Mark
4 Wright"?

5 A. No. Nothing there is obvious to me, no.

6 Q. Going back to the top of the page in the second
7 paragraph under "Details":
8 "Corrections to live system data must be
9 authorised via Account change control and
10 auditable."
11 Does that suggest that still at this date,
12 when you wrote it in 2011 and when Mr Woodley
13 last updated it in 2021, that there wasn't any
14 automated system of secure access and auditing?

15 A. No, I don't remember whether I wrote that
16 sentence or not. But I mean, any change of that
17 type to the system we would want to be auditable
18 in some way. I don't think that says that
19 changes were not actually auditable previously.

20 Q. It continues:
21 "Any correction requiring APPSUP role ..."
22 What was the APPSUP role, please?

23 A. The APPSUP role was an elevated permission that
24 members of the SSC could invoke in order to view
25 or change certain information within a database.

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1 requirement because I hope further down in the
2 financial data bit it does say -- yes, it
3 does -- of the two-man rule is used.

4 Q. You're looking under the heading "Financial
5 data" --

6 A. I am indeed, yes.

7 Q. -- two sentences in?

8 A. Yes, correct.

9 Q. Thank you. Can we move on still further,
10 please, and look at FUJ00087154. This is
11 a document which is described as a "Statement on
12 Fujitsu remote support access to Post Office
13 branch counters", written by Dave Haywood,
14 a security architect within Fujitsu. Do you
15 recall Mr Haywood?

16 A. I do, yes.

17 Q. Where did he work within the company?

18 A. In terms of division or location?

19 Q. Both, please.

20 A. He was part of the architectural team. I think
21 Dave was one of the exceptions who tended to
22 work offsite. I don't remember him being in the
23 Bracknell building, apart from coming down for
24 meetings.

25 Q. So he's neither third or fourth line?

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1 So it was more than our standard permissions.

2 Q. Was it up to them to determine whether they used
3 that enhanced facility?

4 A. It was, yes.

5 Q. Was there any restriction on them using that
6 enhanced facility?

7 A. No, there wasn't, to my knowledge.

8 Q. It says that:
9 "Any correction requiring APPSUP is to be
10 witnessed by a second member of the SSC."
11 The four-eyes approach that we had seen in
12 the earlier documents didn't restrict that
13 requirement to the used to of the APPSUP
14 facility, did they?

15 A. No, they didn't.

16 Q. Was it the four-eyes approach, restricted only
17 to the APPSUP facility, or not?

18 A. The four-eyes approach would be expected for any
19 financial change.

20 Q. Do you know why this puts a different
21 requirement or restriction on it, namely it's
22 the use of the APPSUP --

23 A. Um --

24 Q. -- that triggers the four eyes requirement?

25 A. I think that's probably more bad writing than

114

1 A. No.

2 Q. He's architecture?

3 A. Architectural, yeah.

4 Q. You'll see from the bottom half of the page the
5 distribution list. It includes you and you're
6 described the "Strategic Support Lead". What
7 does that mean?

8 A. I think it's just indicative of the fact that
9 our titles meant that -- meant very little and
10 were sometimes interchangeable. I don't know
11 why Dave used that in that particular document.

12 Q. It should say "SSC Manager"?

13 A. It would be better defined that way, I think,
14 yes.

15 Q. Anyway, if we go over the page, please. The
16 document says that:
17 "In the event that this document is shared
18 outside of [Fujitsu] it should be noted that
19 whilst Fujitsu endeavours to ensure that the
20 information contained in this document is
21 accurate ... it accepts no liability ..."
22 It sets out the "Scope" as being remote
23 support access to branch post office counters
24 under both Horizon Online and Legacy Horizon; is
25 that correct?

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1 A. Yes.

2 Q. It starts with HNG-X. If we just scroll down,
3 please.

4 A. Sorry, may I go back to where we were briefly?

5 Q. Yes, of course.

6 A. You said it referred to HNG-X and Legacy
7 Horizon.

8 Q. HNG-X and HNG-A?

9 A. Ah, right, I thought I heard Legacy but, yes,
10 HNG-X and HNG-A were later systems, yes.

11 Q. Can we just then scroll down and look at HNG-X.
12 Do you see that it sets out a process that is
13 used to access branch counters?

14 A. Indeed, yes.

15 Q. It says that the method is Secure Shell.

16 A. Yes.

17 Q. Can you describe, please, to a lay audience what
18 Secure Shell was?

19 A. It enabled a technician to connect to and
20 execute commands on a remote system over
21 a secure encrypted connection.

22 Q. It says that:
23 "The server component resides on the branch
24 counter and is provided by the Cygwin OpenSSH
25 server package."

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1 from the very early days of Horizon. We used to
2 use a token called a secure ID, right back --
3 I can't give you a date but it was early in
4 Legacy Horizon and, in HNG-X terms, there was
5 a separate secure -- a different secure token
6 that was connected to the PC in order to
7 generate a security token number.

8 Q. Just to be clear, the two-factor authentication
9 token, was that just to get access to the system
10 generally or was a special token required to be
11 issued by the security operations team, if you
12 were going to make changes to branch counters?

13 A. Yeah, a token was required for any secure system
14 access. So that would be anybody in the third
15 line support group, anybody in Belfast or
16 Operations, people in other units would also
17 have had secure tokens if they needed to access
18 the system in something other than a read-only
19 fashion.

20 Q. But there wasn't a special token issued --

21 A. Not for this purpose.

22 Q. -- for the purposes of making alterations, I'm
23 going to call it?

24 A. No.

25 Q. Okay.

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1 What does that mean, please?

2 A. Cygwin was a package that could be used on
3 Windows' platforms to enable Unix-like commands
4 to be executed so Windows and Unix being two
5 different flavours of operating system. It then
6 sets out requirements, if we skip on a couple of
7 paragraphs to "To gain access to the branch
8 counter". It says:
9 "... using the remote support capability the
10 member of staff must ..."

11 Then there are a number of requirements set
12 out:
13 "Be a Fujitsu employee
14 "Have been security and financially vetted
15 ..."

16 Was that a new requirement, to be
17 financially vetted?

18 A. No, I think the financial vetting was the
19 original level of vetting. No, I can't help
20 with that. I'm struggling there.

21 Q. Okay:
22 "Possess a 2 factor authentication token
23 issued by the Security Operations team ..."

24 Can you remember when that was introduced?

25 A. Two-factor authentication tokens were around

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1 Skipping a couple of paragraphs:
2 "Have access to a branch support access
3 private key."

4 What does that mean?

5 A. I don't know. I don't know, sorry.

6 Q. Just going back to page 1, and looking back at
7 the distribution list, the second person to whom
8 the document is said to have been distributed
9 was Chris Jay, who was described as "Defence
10 Legal". Can you remember who that was and what
11 Defence Legal was?

12 A. I remember there was a period when there was
13 some sort of legal oversight going on. I mean,
14 Chris Jay was part of the Fujitsu legal
15 department, as I remember it. I can't remember
16 when his involvement started or why his
17 involvement was on there.

18 Q. You said that you remember a period when there
19 was some sort of legal oversight going on.

20 A. Mm-hm.

21 Q. Legal oversight of what?

22 A. I'm not sure. I just remember occasionally
23 having to pass documents past Chris Jay.

24 Q. Documents about the Horizon System?

25 A. Yes, indeed, yeah.

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1 Q. What was the purpose of having to pass them past
2 Chris Jay?
3 A. Some kind of review. I unfortunately just don't
4 remember precisely why he was, in the loop for
5 something.
6 Q. You said that you remember that being at some
7 period?
8 A. Yes.
9 Q. Can you remember when that was?
10 A. Unfortunately, no.
11 Q. Can we move on, please, to FUJ00087187. We were
12 previously looking at a document dated
13 August 2015, we're now moving, if we look at the
14 foot of this page, to 12 August 2016. Yes?
15 A. Indeed.
16 Q. If we go to the top of the page, the heading is
17 "Transaction Corrections within Riposte based
18 Horizon":
19 "The 'Old' Horizon System (pre-HNG-X) was
20 based upon a product called Riposte. The basic
21 architecture was that each counter had a local
22 database known as the Message store. The data
23 centre had a number of servers known as
24 correspondence servers, each instance of which
25 managed a subset of the live branch estate."

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1 process that was used to effect the equivalent
2 of transaction corrections in old Horizon."
3 Does that match your understanding?
4 A. It does, yes.
5 Q. "Any such correction entered this would be
6 recorded with a node ID of the central
7 correspondence server ([greater than] 32) ..."
8 Can you explain what that means, please?
9 A. Yes. As we saw earlier, where the IDs and nodes
10 within the branches would be 1 upwards,
11 correspondence servers were 32 upwards just to
12 separate them from the branch estate -- or,
13 sorry, make it clear that it was
14 a correspondence server rather than a branch
15 counter.
16 Q. "... and would be included in the standard
17 branch audit trail. Thus they were readily
18 identifiable. The same technique was used to
19 transmit other data ... from the centre to the
20 branch.
21 "Any such correction would have been subject
22 to an ... (Operational change process pre-dating
23 MSCs). Need to find some examples of some old
24 OCPs and some view on how often it happened --
25 Steve Parker?"

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1 All accurate?
2 A. Yes.
3 Q. "Correspondence servers contained large Message
4 stores which replicated to and from the set of
5 counters that correspondence server managed.
6 Thus collectively the central Message stores
7 would contain detail of all branch
8 transactions."
9 Correct.
10 A. All correct, yes.
11 Q. "The old audit system harvested branch
12 transaction data from the correspondence servers
13 giving it an audit trail of all branch
14 transactions."
15 Is that accurate?
16 A. I was never supporting the audit part of the
17 service, so I can't say for sure that it gave
18 an audit trail of all branch transactions but
19 I know that was its purpose.
20 Q. "The replication process between the
21 correspondence server message stores and counter
22 message stores was two way. So it was possible
23 to inject messages into the central message
24 stores and these would be transmitted to the
25 relevant counter message store. This was the

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1 Now, presumably you won't have seen this
2 document, other than for preparing for today?
3 A. That is correct, yeah.
4 Q. Can you remember the context, why in August 2016
5 you would have been being asked for examples of
6 OCPs, old ones, and a view on how often the
7 process described there happened?
8 A. I have to suspect in my mind that this was all
9 to do with legal/litigation issues, but I don't
10 remember the exact -- exact context of this
11 document.
12 Q. The sentence "All such corrections would be
13 recorded with a node ID of the central
14 correspondence server [of greater than 32]",
15 didn't we establish earlier that some
16 corrections would have to be made using the
17 branch counter ID?
18 A. That's correct, yes, a limited, very limited
19 number had to be entered as if they had
20 originated at the branch. Most would be able to
21 be executed at the correspondence server but I
22 can't remember or give you examples of which
23 ones were which.
24 Q. So this is inaccurate to say that any such
25 correction would be recorded with a node ID that

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1 would leave a footprint to make it readily
 2 identifiable as coming from the SSC?
 3 **A.** If it -- I think that depends on your reading.
 4 My reading of it was that, as it said, it was
 5 possible to inject messages into the central
 6 message stores. That sentence was referring to
 7 messages injected into the central message
 8 stores, but I agree it could be read either way.
 9 **Q.** Can we move on, please, to FUJ00087220. We were
 10 previously in August 2016, we're now in October
 11 2016 and this is an email chain in which you
 12 were involved. It's in relation to a Deloitte
 13 audit report, an audit, I think, in which you
 14 were also involved?
 15 **A.** I believe I took part in it, yes.
 16 **Q.** Yes. I think I've got a record of you being
 17 interviewed before it.
 18 **A.** Yes.
 19 **Q.** Can we go to page 5, please. We can see that
 20 this is an email from Stuart Honey to Russell
 21 Norman, Dave Haywood and you?
 22 **A.** Yes.
 23 **Q.** Can you help us with who Mr Honey was?
 24 **A.** Stuart was involved in the security of the
 25 system as well. I can't remember, I think

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1 **Q.** Ah, so some documents had already been
 2 written --
 3 **A.** I believe so, yes.
 4 **Q.** -- that didn't match the process?
 5 **A.** Yes, I believe so.
 6 **Q.** Can you recall in what respect they didn't match
 7 the process?
 8 **A.** I mean, I looked at the information in my
 9 bundles on this whole APPSUP issue. I don't
 10 remember exactly how they didn't correspond to
 11 the actual process but I know that the way that
 12 the SSC used APPSUP at this time allowed any
 13 member of the SSC to escalate privilege, in
 14 order to make -- in order to work on the system
 15 in a privileged fashion.
 16 I believe the documentation said that any
 17 such changes in HNG-X would only be done via
 18 a development provided script. It was around
 19 that area. I mean, the whole thing got
 20 extremely complicated and went backwards and
 21 forwards for sometime.
 22 **Q.** So there's a debate really here whether the SSC
 23 should do what's in a written policy or whether
 24 the written policy should, in effect, be a piece
 25 of reverse engineering --

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1 Stuart was more on the development side than --
 2 as opposed to Dave Haywood being on the
 3 architectural side.
 4 **Q.** In any event, the email that's sent to you and
 5 others says:
 6 "Hi Russell,
 7 "I sent some information to Stuart Honey
 8 regarding this ..."
 9 Then that's repeated.
 10 "... and I was not sure of the outcome after
 11 that point. Was this linked to the info Paul
 12 has collated for data flows -- Paul/Dave/Stuart
 13 APPSUP -- Steve raised the point about whether
 14 the process should be changed to match the
 15 designs or the designs changed to match the
 16 process as in the attached?"
 17 Doing the best we can of reading this email,
 18 you're reported -- I think you're the Steve
 19 here -- as saying, "Should we" -- is this right
 20 -- "write documents that match the process that
 21 we currently operate or should we change our
 22 processes to match designs in documents that we
 23 are to write?" Is that right?
 24 **A.** Yes, except the documents are already written,
 25 I believe.

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1 **A.** Sure.
 2 **Q.** -- to reflect what it does in practice?
 3 **A.** Indeed.
 4 **Q.** What was the outcome?
 5 **A.** As I remember, the outcome was that, in order
 6 to -- in order for the development group to
 7 provide scripted -- the ability for scripted
 8 changes for everything the SSC did, it became
 9 too difficult to implement for reasons of the
 10 logistics of people being available out of hours
 11 to approve SSC access and then make changes to
 12 the system in order to allow a member of the SSC
 13 to elevate access or use scripts. It was --
 14 there was -- it was more to do with "We can't
 15 get the right people on call to do this", and
 16 a pragmatic view was taken that, since all SSC
 17 access via APPSUP in HNG-X was audited anyway,
 18 the existing methods would continue to be used.
 19 **Q.** I think we can see your reply on page 4, if we
 20 scroll down. We can see that is from you to
 21 Stuart Honey and others?
 22 **A.** Yes. This was an earlier stage in that process,
 23 yes.
 24 **Q.** You say:
 25 "In principle ... I would prefer that we

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1 have this removed ..."

2 That was the-- the "this" here was
3 essentially the APPSUP access --

4 **A.** The ability to raise our privilege to APPSUP
5 level without any --

6 **Q.** Auditable oversight?

7 **A.** Thank you, yes.

8 **Q.** You said in principle you would prefer that you
9 had that privileged access removed so that you
10 could go back to the security model as
11 documented. You wanted to do what the policy
12 said ought to be done, rather than what was in
13 fact being done?

14 **A.** Correct, yes.

15 **Q.** But for pragmatic reasons that was not possible?

16 **A.** I do outline some of those, the issues that were
17 going to be experienced further on there.

18 **Q.** How significant an issue was this?

19 **A.** It went backwards and forwards for sometime.
20 But it was -- it's a reasonable example of the
21 pure security view which says "You just don't do
22 this" and the pragmatic view which says that was
23 the only way we could logistically manage the
24 process.

25 **Q.** Can we go forwards, please, to a little later in
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1 proficient, having been in a management role for
2 longer, and I didn't feel competent to actually
3 comment on this kind of a document.

4 **Q.** Can we look at what it says is the formal policy
5 by October 2016, at page 13, please. Scroll
6 down to 4.1.2 "Audit", it states:

7 "Although no active command logging or
8 keystroke logging is done, we are keeping
9 a record of people logged on to SAS Server
10 through double authentication and OS security
11 policies for state servers."

12 Firstly, the things that aren't being done,
13 active command logging, what's that?

14 **A.** Believe that refers to logging the commands
15 being executed. Why that's been distinguished
16 from keystroke logging, I'm not clear, really.

17 **Q.** Are they essentially the same thing?

18 **A.** Actually, probably not, thinking about it.

19 Keystroke logging, if you were entering data
20 into a field in a form on a screen, then
21 keystroke logging would detect as you enter keys
22 5, 4, 3, 2, et cetera. Whereas command logging
23 would log the whole string that you put in after
24 any corrections have been done.

25 **Q.** So on that example --

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1 October 2016. Sorry, this is August 2016 to

2 October 2016, to FUJ00089535. You'll see that

3 this is a formal policy document setting out the
4 high level design for the remote access secure

5 access server, written by Mr John Bradley. If

6 we turn to page 4, at the foot of the page,

7 I think we can see that you're a reviewer?

8 **A.** Yes. Whether I reviewed or not is debatable.

9 That form of entry with my name and the name of
10 a member of the SSC afterwards, I was sent every
11 document for review and I would farm those out
12 to individual members of the SSC who would
13 respond for me.

14 **Q.** I see. We can see that the mark in brackets
15 afterwards takes us to -- underneath "0.3 Review
16 Details", it shows that it was somebody that
17 actually returned a comment?

18 **A.** Yes.

19 **Q.** Does that mean it was Mr Breakspear that did
20 so --

21 **A.** Yes.

22 **Q.** -- or does it mean that either of you and
23 Mr Breakspear did?

24 **A.** I would expect that to mean Phil did. By that
25 time, I was getting less and less technically

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1 **A.** So, thinking about it, I can see why there is
2 a difference there, yes.

3 **Q.** So, in your example, command logging would just
4 record that you had committed to whatever
5 process you were undertaking, the digits 5, 4,
6 3, 2, 1. It wouldn't record that you initially
7 typed 7, 8, 9, 10, deleted them and then wrote
8 5, 4, 3, 2, 1 and then committed them to the
9 process?

10 **A.** That's correct, yes.

11 **Q.** Why would command logging or keystroke logging
12 be contemplated for secure access to the live
13 estate?

14 **A.** It gives an irrefutable record of precisely what
15 was being -- was being executed.

16 **Q.** In that way, it is entirely auditable after the
17 event?

18 **A.** It would be, yes.

19 **Q.** In what sense is that a normal standard for the
20 kind of remote access to financial data that we
21 are speaking about here, or to what extent is it
22 a gold standard that's never achieved?

23 **A.** I don't know what the documented standards are,
24 industry standards are, in this area. So
25 I can't be sure.

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1 Q. Can you recall discussion across the ages as to
 2 whether or not active command logging and/or
 3 keystroke logging ought to have been the
 4 standard that should be achieved?
 5 A. I don't remember discussions. It would be my
 6 preference, for the reasons we have stated
 7 previously, that it gives an irrefutable record
 8 of what's been done.
 9 Q. So it was that, even by 2016, despite the
 10 documents we've previously seen as to what had
 11 been proposed, that this still that not been
 12 introduced?
 13 A. Yes, that would have been my reading.
 14 Q. Had that been the subject of discussion and
 15 debate?
 16 A. No. But if I may, I will rewind slightly.
 17 There was keystroke logging introduced as part
 18 of the SSH implementation that we've been
 19 looking at here, and I know for a period
 20 keystroke logging did take place because
 21 I remember there being servers that contained
 22 the log data.
 23 At some stage, and I don't remember when, it
 24 must have come out of the system again for some
 25 reason. I have no recollection of when it came
 133

1 software that ran the database services. You
 2 literally called a command "set role APPSUP".
 3 Q. Okay, so it's not speaking but person's role;
 4 it's speaking about a role in terms of
 5 a function that a system performs?
 6 A. It is, yes.
 7 Q. Okay. You'll see that you created this on
 8 31 October. Again, it had a later update, last
 9 by Mr Gelder, and we're looking by version 21?
 10 A. Yes.
 11 Q. So, again, we should bear in mind that not every
 12 word will be yours and maybe none of them are
 13 yours. Can we see under heading "Below is the
 14 Historic Process", it says:
 15 "The Horizon security design has two main
 16 groups with privileged access to the system.
 17 Belfast Operations for operational purposes and
 18 SSC for data correction and support."
 19 Is that accurate, that there were two main
 20 groups within Fujitsu who had privileged access
 21 to the system?
 22 A. Yes.
 23 Q. "This privilege was deliberately split between
 24 the two units to separate the roles for security
 25 purposes and prevent a single point of failure."
 135

1 out or why.
 2 Q. Who would have put it in and who would have
 3 taken it out?
 4 A. It was put in as part of the version of Horizon
 5 that we saw earlier when we were talking about
 6 this was about the time of network banking.
 7 That's when it would have gone in. I believe,
 8 the more I think about it, it probably came out
 9 at HNG-X but I'm not positive of that.
 10 Q. Your best memory is between about 2006 and 2010?
 11 A. Correct.
 12 Q. Can you recall, in general terms, the reason
 13 why, despite it being so obviously desirable
 14 that it was not done?
 15 A. I can't remember why now, no.
 16 Q. Thank you.
 17 Can we go to FUJ00138382. This is
 18 exceptionally difficult to read, so I'll take it
 19 slowly. It's another work instruction; can you
 20 see that?
 21 A. Yes, I can.
 22 Q. Its title is the "APPSUP role".
 23 A. Yes.
 24 Q. Why was it described as a role?
 25 A. That was the term used within the Oracle
 134

1 Can you explain how splitting, as it's
 2 described, operational purposes and data
 3 correction and support, prevents a single point
 4 of failure?
 5 A. If for some reason there was a disaster which
 6 rendered the SSC inoperable or there are network
 7 connections in to the service that make it
 8 inoperable, then Belfast Operations could carry
 9 out commands on our behalf or vice versa.
 10 Q. It continues:
 11 "In each case the requirement is for
 12 a distinct privileged role that would only be
 13 used when suitable change control has been
 14 raised for audit trail, not authorisation
 15 purposes."
 16 Can you explain what that means? It tends
 17 to suggest, does it, that the audit trail is the
 18 desired focus for the change control process,
 19 rather than actually being for authorising the
 20 change? Sorry, that's a terrible question.
 21 A. No, I understand what you're saying. I think
 22 you're right. Because the SSC were capable of
 23 doing a set role APPSUP without authorisation,
 24 then that sentence, in some ways, makes sense.
 25 The statement is being made that you should
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1 raise the change control to make sure a record
 2 is being kept.
 3 **Q.** Does it follow that the Operational Change
 4 Process was all about creating an audit trail
 5 and not about actually seeking authorisation in
 6 each case?
 7 **A.** No. No. I mean, the change control process was
 8 as much -- for most purposes, was as much about
 9 the approval as about ensuring whatever was
 10 being affected wasn't documented.
 11 **Q.** Can you help us, this is within seven days, this
 12 work instruction was raised, of the formal
 13 policy setting out high-level design for remote
 14 access to the secure access server. Remember,
 15 that one was dated 24 October 2016 and we're now
 16 on the 31 October 2016.
 17 **A.** Right, yes.
 18 **Q.** Why was it necessary, in October 2016, to set
 19 out in a work instruction the historic process
 20 that had been followed years before but was now
 21 no longer followed?
 22 **A.** I don't know. I have no recollection of it.
 23 **Q.** At this stage, can you remember, were complaints
 24 being made and litigation contemplated?
 25 **A.** Timing wise, I would say that's possible but
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1 paragraph 72, which is on page 23. If we scroll
 2 down, thank you. You say:
 3 "The SSC was hugely reluctant to change
 4 transaction data as that was not our job and we
 5 recognised the seriousness of doing so."
 6 Why were you being requiring to change
 7 transaction data when it wasn't your job?
 8 **A.** If there was a situation where it was impossible
 9 for a change to be effected by the Post Office,
 10 in order -- via a transaction correction or
 11 whatever other mechanisms they used, then, in
 12 rare circumstances, it may be necessary for us
 13 to effect a financial change. I mean, the
 14 comment that it is not our job was -- you know,
 15 we would much prefer in all cases that financial
 16 information was rectified by the Post Office and
 17 not us.
 18 **Q.** Did you say you would much prefer in "court
 19 cases"?
 20 **A.** No, in all cases.
 21 **Q.** In all cases, thank you.
 22 **A.** Yes, yes.
 23 **Q.** Why would you much prefer that?
 24 **A.** Because I don't believe that people who were
 25 supporting a system should be responsible for
 139

1 I don't remember that being the case here, or
 2 a motivation here. I don't remember enough
 3 about it to tie that in.
 4 **Q.** Can you think of a reason why a work instruction
 5 would be written in October 2016 that set out,
 6 not a work instruction, but an historic process
 7 in the past?
 8 **A.** Not really, no, because, I mean, I would have
 9 expected that kind of thing to have already
 10 existed. So I'm not clear why this is here in
 11 this form.
 12 **Q.** You wrote the document?
 13 **A.** Yeah, and I just -- unfortunately just don't
 14 remember what I was trying to achieve at that
 15 time.
 16 **Q.** You think it was "We've got a new document dated
 17 24 October setting out what we're going to do in
 18 the future, we need to reduce to writing" --
 19 **A.** What we did in the past.
 20 **Q.** -- "what we did in the past, so that it's
 21 accurately recorded because we now know it's
 22 going to be the subject of questions"?
 23 **A.** It's the sort of thing I can see myself doing
 24 I just don't remember it.
 25 **Q.** Can we go to your witness statement, please, at
 138

1 making financial changes. That is a business
 2 position.
 3 **Q.** So whose job was it?
 4 **A.** I would argue that POL should be issuing some
 5 form of transaction correction for
 6 a postmaster's account.
 7 **Q.** Why weren't they doing it?
 8 **A.** I believe there were some circumstances where it
 9 just couldn't be effected with the tools they
 10 had.
 11 **Q.** Is that because you controlled access to the
 12 dominion that required changing and that they
 13 simply physically could not do it?
 14 **A.** I believe so, yes. Yes.
 15 **Q.** At the time, did you express your concern that
 16 you were being required to change transaction
 17 data that wasn't your job?
 18 **A.** That comment would be made with the caveat that
 19 sometimes we just had to do it. There was no
 20 choice. But the circumstances were rare.
 21 **Q.** You say in paragraph 72.4 over the page that --
 22 the lead-up to this paragraph is:
 23 "In the rare circumstances where it was
 24 necessary to correct financial information on
 25 the system we would ...
 140

1 "72.4. Ensure POL and/or the subpostmasters
2 were informed (... via the Service Delivery
3 Team)."
4 **A.** Yes.
5 **Q.** How would you ensure that POL and/or the
6 subpostmasters were informed?
7 **A.** By giving the necessary information to the
8 Service Delivery Team for onward routing to the
9 Post Office or onward discussion with the Post
10 Office.
11 **Q.** Where you're referring here to the Service
12 Delivery Team, who are you referring to within
13 Fujitsu?
14 **A.** People's names or roles?
15 **Q.** Roles, please.
16 **A.** It's the team I was referring to earlier in our
17 discussion, who had various service managers who
18 would be responsible for different parts of the
19 system and that could collectively be termed the
20 Service Delivery Team.
21 **Q.** Did you expect subpostmasters therefore to be
22 informed on each occasion that changes were made
23 to financial data concerning their counters and
24 their branches to be informed that that had
25 happened?

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1 supplemental questions on the issue we were just
2 addressing and go back to paragraph 85 of your
3 witness statement on page 31, please. So it's
4 paragraph 85.

5 You'll remember the "One would have to
6 concede" sentence, and then you set out some
7 controls that give protection against the errors
8 or similar that you have identified as
9 a possible consequence of remote access. I just
10 want to ask you about the one you identify in
11 85.2 and so you say:

12 "Controls offered some protection here ..."

13 Then 85.2:

14 "Any such intervention would be with the
15 subpostmaster's consent and the subpostmaster
16 would use system reporting to check that the
17 results of SSC work were as expected."

18 Dealing with the first part of the sentence
19 first, any such intervention would be with the
20 subpostmaster's consent. Are you saying that
21 before the SSC made any changes to data, any
22 alterations or inserted messages, that was
23 always done with the subpostmaster's consent?

24 **A.** I would probably have to amend that to say where
25 the incident to originated from the

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1 **A.** Oh, yes.

2 **MR BEER:** Sir, I wonder whether we could take the
3 break now, please, until, say, 3.15.

4 **SIR WYN WILLIAMS:** Yes, and how do you predict the
5 remaining afternoon going?

6 **MR BEER:** Sir, I've got another topic, which is
7 about 20 minutes, to cover. Then I think --

8 **SIR WYN WILLIAMS:** Are there many CP questions?

9 **MR BEER:** Five minutes and two minutes, I've been
10 told, sir.

11 **SIR WYN WILLIAMS:** Right. So we're well on track to
12 finish Mr Parker this afternoon, that's what it
13 boils down to?

14 **MR BEER:** Yes, sir.

15 **SIR WYN WILLIAMS:** Fine. What time again, sorry?

16 **MR BEER:** 3.15, please.

17 **SIR WYN WILLIAMS:** Fine.

18 (3.02 pm)

19 (A short break)

20 (3.15 pm)

21 **MR BEER:** Good afternoon again, sir. Can you see
22 and hear me?

23 **SIR WYN WILLIAMS:** Yes, I can.

24 **MR BEER:** Before we move to the topic that I said
25 I was going to move to, can I just ask you some

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1 subpostmaster, then clearly we would be in
2 contact with him or her and would be discussing
3 and telling them we are effecting something for
4 them. I think that I should probably caveat it
5 in just that way.

6 **Q.** Just dealing with that caveatted way first,
7 being in contact with a subpostmaster doesn't
8 necessarily mean that you have their consent to
9 make alterations to their financial data,
10 agreed?

11 **A.** Yes, yes.

12 **Q.** So, even in the cases where you were in contact
13 in the SSC with a subpostmaster, it was not the
14 case that you always obtained their consent
15 before alterations to financial data were made;
16 is that right?

17 **A.** I want to say that it's not right and that we
18 would always discuss with the subpostmaster but
19 there was no controls to ensure that was the
20 case.

21 **Q.** Why were there no controls to ensure that that
22 was the case?

23 **A.** Again, change control would always be used, but
24 that was effectively the only control in that
25 process.

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1 Q. Change control was focused on the Post Office as
 2 an institution, rather than the individual
 3 subpostmaster knowing, less still consenting, to
 4 the change?
 5 A. That is true. That is true. But I would expect
 6 that, whenever a member of the SSC was working
 7 on a subpostmaster call, they would be talking
 8 to them as necessary and helpful to them.
 9 Q. Let's deal with the sentence without the caveat.
 10 In a case where SSC was talking with one
 11 subpostmaster but on examination it was found
 12 that the problem affected the financial data of
 13 100 subpostmasters, those other 100
 14 subpostmasters were not contacted, and --
 15 A. Well --
 16 Q. -- said that there will be a correction made to
 17 their data?
 18 A. They wouldn't be by the SSC, no.
 19 Q. Were they contacted by anyone, to your
 20 knowledge?
 21 A. In the case of a change to that scale, ie 100
 22 subpostmasters, I mean, that would have gone --
 23 been part of the problem management process, it
 24 would have gone through service managers it
 25 would have gone through POL.

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1 correction has been made without your
 2 knowledge"?
 3 A. No, I don't know about that sort of process, no.
 4 Q. Thank you, that can come down.
 5 Can we turn to the topic I wanted to ask
 6 about which is the process by which Anne
 7 Chambers came to give evidence in the Lee
 8 Castleton case.
 9 A. Right, yes.
 10 Q. You know that Mrs Chambers gave evidence in the
 11 Lee Castleton trial in 2006?
 12 A. I do, yes.
 13 Q. What was your involvement in the process that
 14 led to her giving evidence?
 15 A. I don't remember being involved in the process
 16 that led to her giving evidence in any
 17 substantive way. I may have helped in the
 18 provision of some information.
 19 Q. Information to who?
 20 A. To either Anne or the Post Office. But --
 21 Q. Information about what?
 22 A. About the issue.
 23 Q. What was the issue?
 24 A. I don't remember exactly the history of that
 25 particular incident.

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1 Q. Yes. Were you personally involved in carrying
 2 out any of the communications back down to the
 3 subpostmaster --
 4 A. I very rarely --
 5 Q. -- in that kind of incidence?
 6 A. In that kind of incident I was not personally.
 7 Q. Were any of your staff in the SSC involved,
 8 "We're talking with one subpostmaster, we've
 9 discovered that the bug affects 100 others,
 10 let's, in the SSC, contact the other 100"?
 11 A. No. No.
 12 Q. That wasn't part of the SSC's function?
 13 A. No, it wasn't.
 14 Q. What do you know about the process by which
 15 those other 100 would be contacted?
 16 A. Very little. I would have expected it to have
 17 gone through the Post Office in -- I think, in
 18 all cases. We wouldn't phone up a large number
 19 of subpostmasters ourselves.
 20 Q. Do you know anything about a process by which
 21 such subpostmasters would be contacted by the
 22 Post Office --
 23 A. No.
 24 Q. -- to say "A bug has been discovered, it's
 25 affected your data without your knowledge. A

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1 Q. So when you say you may have been involved in
 2 giving information about the issue concerning
 3 the incident, do you mean information about the
 4 subpostmaster, Lee Castleton, and the Marine
 5 Drive branch?
 6 A. Yes, I recollect vaguely being asked a few
 7 questions about it and filtering those -- some
 8 of Anne's answers back.
 9 Q. Why was Anne Chambers selected to give evidence?
 10 A. Because she was the person who had worked on the
 11 problem.
 12 Q. Was she content to give evidence?
 13 A. No. I mean, she -- as I remember, she wasn't
 14 particularly happy about the idea of giving
 15 evidence and the situation was somewhat forced
 16 on her.
 17 Q. Who forced it on her?
 18 A. It was internal Fujitsu politics.
 19 Q. Who were the internal Fujitsu politicians?
 20 A. I would have to refer you to Mik Peach for that.
 21 He was manager then and, like, would have been
 22 the person who was directly involved in it.
 23 Q. Why did she not want to give evidence or why was
 24 she not content that she should give evidence?
 25 A. My impression, when I had the opportunity to

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1 talk to her, was that it was the environment and
 2 the stressful nature of the questioning process.
 3 **Q.** So was it after the event that you learned that
 4 she was unhappy --
 5 **A.** Yes.
 6 **Q.** -- rather than beforehand?
 7 **A.** Fairly sure it was, yes.
 8 **Q.** Can we look at a couple of documents, please.
 9 POL00070133. Can we look at the foot of the
 10 page, please. There's an email from Mandy
 11 Talbot in Royal Mail to Gary Blackburn and
 12 others in Royal Mail, and a copy to Stephen
 13 Dilley:
 14 "Lynne, further to our chat can you advise
 15 what are the names of the postmasters and
 16 addresses of the branches if possible of the
 17 following FAD codes ...
 18 "In February of this year you wrote to Gary
 19 Blackburn and he wrote to Shaun Turner and then
 20 Sandra MacKay about these branches which had
 21 apparently registered complaints about the
 22 Horizon System. Fujitsu have told us that in
 23 respect of Callendar Square that there was
 24 a problem when stock was transferred from one
 25 stock unit to another but this would only apply
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1 a repeat performance tomorrow once the FAD codes
 2 have been identified and the name of the
 3 branches revealed. Incidentally can you
 4 identify branches from FAD codes? As, if so,
 5 this might give you a head start?"
 6 Can you recall what the repeat performance
 7 she was talking about was?
 8 **A.** I don't, no.
 9 **Q.** Can you recall the context of this, namely
 10 Mr Castleton raising the existence of the
 11 Callendar Square bug and you and Fujitsu being
 12 asked to investigate its extent and the branch
 13 that it was said to have affected?
 14 **A.** Not really, no. No.
 15 **Q.** "Stephen and Richard our legal team at the Court
 16 will be doing their best to persuade the Court
 17 not to allow Castleton [I think that's
 18 Mr Castleton] to call this evidence because it
 19 is filed late and does not relate to the
 20 problems at his branch office. If they are
 21 successful there will be no need to progress any
 22 further with these investigations but as
 23 Castleton is a litigant in person it is common
 24 for Judges to be sympathetic and may allow him
 25 to rely on his evidence. If so you will have to
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1 when there was more than one stock unit, ie more
 2 than one position at the counter.
 3 "Did any of you find out what the problems
 4 were at the other branches and what did POL and
 5 Fujitsu do to correct them?"
 6 Can you recall your involvement in the
 7 Callendar Square bug?
 8 **A.** I don't recall. It was very little.
 9 **Q.** Can you recall whether that suggestion there,
 10 that the bug would only apply where there was
 11 more than one stock unit, ie more than one
 12 position at the counter, is accurate or not?
 13 **A.** No, but I watched Anne's testimony so I saw what
 14 she said about it but that's why I can recall
 15 something now, but only what she said then.
 16 **Q.** Okay, and so if I ask you questions about that
 17 you'd be replaying to us what you saw Anne say
 18 last week?
 19 **A.** I would, yeah.
 20 **Q.** Okay. Can we go to the top of the page, please.
 21 It is sent on to you, can you see --
 22 **A.** I do.
 23 **Q.** -- by Mandy Talbot on 6 December:
 24 "Steve I have copied you into this email to
 25 POL because it may be that you might have to do
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1 pull out all the stops to investigate what, if
 2 anything, went wrong at these branches and why
 3 we can distinguish them from Mr Castleton at
 4 Marine Drive."
 5 Can you recall what work you did, in fact,
 6 do to seek to distinguish what had gone wrong at
 7 these other branches and why those problems had
 8 not afflicted Mr Castleton at Marine Drive?
 9 **A.** No, I mean, I suspect that from the date while
 10 this was going on, I was acting in some reason
 11 as sort of deputy manager while Mik may not have
 12 been there and I would have farmed that job out
 13 to somebody else to actually do, so I don't
 14 remember what was done.
 15 **Q.** Can we see what I think is your reply at
 16 POL00070135. If we just look at the foot of the
 17 first page and then a bit of the second page, we
 18 can see that this is your email, yes?
 19 **A.** Yes.
 20 **Q.** So this is a reply on 6 December. You say:
 21 "Mandy,
 22 "As discussed on the phone today:
 23 "Callendar Square demonstrated a software
 24 problem within Horizon. The problem has been
 25 present prior to 2004. For an unidentified
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1 reason Callendar Square was badly hit by it from
 2 September '05. Problem was fixed during release
 3 S90 of the Horizon software.
 4 "The incidents at Marine Drive show no
 5 symptoms of this problem. In particular:
 6 "1) Problem occurred when transferring stock
 7 between stock opportunities. Marine Drive had
 8 any one stock unit so couldn't do transfers."
 9 That's the point that Mrs Chambers corrected
 10 last week.
 11 **A.** Yes.
 12 **Q.** "2) Problem caused an event storm ... with
 13 specific details. There were none of these at
 14 Marine Drive.
 15 "3) Problem caused a receipts and payments
 16 mismatch which showed on the cash account. This
 17 didn't happen on Marine Drive."
 18 For these, did you conduct the investigation
 19 to highlight those three points?
 20 **A.** No.
 21 **Q.** Where did you get the information from?
 22 **A.** I don't remember who I asked to do it. I would
 23 have expected, if Anne was about, I would have
 24 probably asked her because of her experience
 25 previously with that, with Callendar Square.

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1 **Q.** Was it true?
 2 **A.** I don't remember.
 3 **Q.** "Fujitsu say that this particular software
 4 glitch was known about in 2004 and the initial
 5 response to a problem by the Helpdesk would
 6 usually be to suggest user error ..."
 7 Is that correct, the initial response of the
 8 Helpdesk was usually to suggest user error?
 9 **A.** I don't know what the Helpdesk was saying to the
 10 subpostmasters on this issue, unfortunately,
 11 sir.
 12 **Q.** "... but that if it continued the problem had
 13 a pretty firm footprint which could be picked up
 14 by Fujitsu. Further that this glitch is limited
 15 to counters which have more than one stock unit
 16 and as Marine Drive had only one stock unit and
 17 the footprint did not appear it cannot explain
 18 Castleton's problems. The glitch would also be
 19 observed as a mismatch in the receipts and
 20 payments records.
 21 "This particular glitch was known to Fujitsu
 22 prior to 2004 and as such it is one of the
 23 things which would automatically have been
 24 checked for by Fujitsu when conducting their
 25 analysis."

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1 But I can't be sure.
 2 **Q.** Can we go to the top of the page, please.
 3 You're not copied in on this but Mandy Talbot
 4 forwards your email to Stephen Dilley, the Bond
 5 Dickinson solicitor; Richard Morgan, Post Office
 6 counsel; Dave Hulbert, who I don't know; and
 7 then two others within the Post Office. She
 8 says:
 9 "Anne Chambers conducted the analysis for
 10 Fujitsu."
 11 Does that help you recall what the content
 12 of your telephone conversation may have been
 13 with Mandy Talbot or might she have been talking
 14 directly to Anne Chambers?
 15 **A.** It's quite possible she was talking directly,
 16 but I'm not sure.
 17 **Q.** Ms Talbot continues:
 18 "She can give evidence on this. She will
 19 not say that no problem has arisen with the
 20 Horizon System since Castleton was sacked but
 21 will say that no serious problem have been
 22 elevated to their team to deal with."
 23 Dealing with those, was it the case that no
 24 serious problems had been elevated to the SSC?
 25 **A.** I'm assuming that was what was meant there, yes.

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1 Is that right, when individuals were being
 2 either prosecuted or civil proceedings were
 3 being taken against them or civil proceedings
 4 were being defended, Fujitsu would conduct
 5 a series of checks as part of an analysis to see
 6 whether that branch was afflicted by known bugs.
 7 **A.** I believe it was but I didn't conduct --
 8 I didn't request any of those such things
 9 myself.
 10 **Q.** Why do you believe that it was?
 11 **A.** Only because of my experience with what I've
 12 seen during the High Court cases and things.
 13 **Q.** People in your department, would they be
 14 involved in conducting this analysis to see
 15 whether the branch or the subpostmaster, against
 16 whom action was being taken, whether they or
 17 their branch were afflicted by any of the known
 18 bugs in the system?
 19 **A.** I believe the process was by then that it would
 20 be Gareth Jenkins who was actually presenting
 21 the information to court. So we would be in the
 22 SSC providing him with the information he
 23 required. It would be him who did the analysis,
 24 witness statement, et cetera.
 25 **Q.** But people in your team would be providing him

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1 with the evidence that he would give?

2 **A.** We would be providing him with the raw data he
3 asked for, yes.

4 **Q.** Was there a written process which said, "In the
5 event of a criminal investigation, a prosecution
6 or civil proceedings, these are the checks that
7 the SSC must perform"?

8 **A.** I wasn't aware -- no, I wasn't aware of any such
9 documents. I also think it's worth mentioning
10 at this stage that the data as used in court
11 would have actually come from the audit system
12 via an ARQ request. When the SSC was providing
13 data, this would be for initial analysis
14 purposes.

15 **Q.** So the data that the SSC provided to Mr Jenkins,
16 was that for information only and he wasn't to
17 use it as the basis to form conclusions --
18 evidential conclusions?

19 **A.** Not for evidential conclusions. There was
20 something around the fact that all data that was
21 to be provided for court cases had to come via
22 an ARQ request and audit because there was
23 certain evidential change of evidence rules.
24 I don't remember the exact details.

25 **Q.** This email continues, skipping a paragraph:
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1 POL00099397.

2 Sir, those two document are unavailable.
3 I will therefore have to ask any questions of
4 Mr Parker about them if and when he returns on
5 the next occasion to give evidence.

6 **SIR WYN WILLIAMS:** All right.

7 **MR BEER:** Sir, those are the only questions I ask.
8 Thank you, Mr Parker.
9 I think it's Mr Jacobs first.

10 Questioned by MR JACOBS

11 **MR JACOBS:** Hello, good afternoon, Mr Parker.
12 I represent 156 subpostmasters who instruct
13 Howe+Co and I have two questions for you.
14 Firstly, this morning, Mr Beer asked you about
15 Helpdesk scripts.

16 **A.** Mm-hm.

17 **Q.** You said they were written by senior
18 technicians.

19 **A.** Correct, yes.

20 **Q.** What we're interested to know is are you able to
21 provide the names of those technicians who wrote
22 the scripts?

23 **A.** Unfortunately, no. I mean there was number of
24 people within the HSD who were considered more
25 senior that but I very rarely met them so
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1 "Steve Parker who conducted the
2 investigation with Anne ..."

3 Did you conduct the investigation with Anne?

4 **A.** No, I just think that was Mandy Talbot's
5 impression because I was involved in the phone
6 calls and things.

7 **Q.** So that's incorrect?

8 **A.** I would say so, yes.

9 **Q.** Was it only Anne Chambers that conducted the
10 investigation?

11 **A.** I don't remember any substantive input on my
12 part, no. So, yes, it would have been Anne.

13 **Q.** To your knowledge, was anyone else involved in
14 the investigation of Lee Castleton and the
15 Marine Drive branch, within the SSC?

16 **A.** I don't remember.

17 **Q.** Can we move forwards, please, to FUJ00138386.
18 Thank you. We'll see this is another work
19 instruction.

20 Can I just check the reference, please?
21 That's 8367. I'm looking for 8386.
22 Okay, that doesn't appear to have been
23 uploaded. I'll have to skip over those
24 questions.

25 Can we move, please, to POL00099397.
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1 I don't remember those names, sorry.

2 **Q.** Are you able to tell us perhaps someone who
3 might know, so we can ask someone else?

4 **A.** The only suggestion I would have on that is the
5 current -- well, current -- when I was last
6 working for Fujitsu, the service manager for
7 that area at the time was Sandie Bothick.

8 **Q.** Sandie?

9 **A.** Bothick.

10 **Q.** Bothick. Okay, thank you.

11 **A.** So she would have been around the HSD at that
12 time.

13 **Q.** That's very helpful, thank you.

14 The second question is a question you may
15 already have heard because it was a question
16 that Mr Stein put to Mrs Chambers last week --

17 **A.** Okay.

18 **Q.** -- at the end of her evidence and I want to ask
19 you the same question. So the question is:
20 during the evidence of this Inquiry, many of our
21 clients, subpostmasters and subpostmistresses,
22 said that their accounts, their branch accounts
23 never seemed to balance.

24 Examples are Janice Adams said that her
25 branch accounts didn't balance and shortfalls
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1 occurred on a weekly basis, and the weekly
2 deficit was usually about £50 but higher on
3 occasions, and she said she used to put these
4 accounts routinely into the system in cash in
5 order to continue to trade the next day.

6 Mujahid Faisal Aziz says similarly that
7 there were many small shortfalls. He would
8 estimate on average £50 to £80 shortfalls per
9 week, which they always made good straightaway,
10 again by paying cash. Edward Brown said that
11 similar matters occurred to him and it wasn't
12 always a large shortfall but sometimes it could
13 be in the thousands. Gary Brown reported that
14 the shortfalls happened so often that it was
15 hard to keep track.

16 Now a question for you is: can you help us
17 understand how it was that the subpostmasters
18 and mistresses experienced so many shortfalls?

19 **A.** No, I'm afraid I can't, without an investigation
20 of each of their issues, because there were
21 a number of different possibilities there. So
22 no, I mean, I can't explain why a large number
23 of your clients have those issues.

24 **Q.** Again, looking at the same point, would there be
25 anybody else who you worked with who might be

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1 for particular system events that might have
2 come up overnight?
3 **A.** Yes, that would be true, yes.
4 **Q.** Is it right that you'd look on the event logs
5 for that, perhaps the NT Event Log, but perhaps
6 there were other ones as well?
7 **A.** That wouldn't be a function the SSC would have
8 performed, but yes. I mean, probably the name
9 we were trying to get to earlier was Tivoli, and
10 that would have been a function performed by the
11 estate management team. So they would have been
12 looking out for events of a certain nature and,
13 if necessary, then raising incidents.

14 **Q.** So if they raised an incident that meant it
15 would come through to SSC; is that right?

16 **A.** Potentially, but it may have been an event which
17 indicated something which a different team
18 needed to see. So it wouldn't necessarily
19 always be SSC.

20 **Q.** If it was one that they knew was on the SSC
21 radar --

22 **A.** Yes.

23 **Q.** -- then it would come through to you; is that
24 right?

25 **A.** It would do, yeah.

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1 able to throw some light on this, if you can't

2 answer the question?

3 **A.** I can't think of anybody relevant for that
4 particular thing, sorry.

5 **MR JACOBS:** That's fine. Thank you very much.

6 I haven't any more questions.

7 Questioned by MS PAGE

8 **MS PAGE:** Hello, I'd like to ask some questions

9 about the overnight processes for checking for
10 system errors.

11 **A.** Okay, yes.

12 **Q.** I understand that the program Tiscali was
13 involved in that, is that right?

14 **A.** Not aware of that name.

15 **Q.** No? Is it right that there were automated
16 processes that checked across the estate for
17 system problems?

18 **A.** Yes.

19 **Q.** Would some of the system events appear on what's
20 called the NT Event Log?

21 **A.** Yes, that would be one place where problems or
22 notable events would be written, yes.

23 **Q.** Is it right that some of them were particularly
24 on the radar, as it were? At any given time,
25 there might be a reason why you'd be looking out

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1 **Q.** This may or may not still ring a bell -- but
2 does an event which said the hard disk has a bad
3 block, does that ring a bell?

4 **A.** It does. That would be in the Legacy days
5 generally because that was when incidents of
6 hard disk error actually caused problems with
7 the Riposte messaging software.

8 **Q.** Right. So if you got that, it might mean that
9 there was problems with the messages?

10 **A.** It might do, yes. I mean, it wouldn't always do
11 but it's one of those --

12 **Q.** Would that mean that would be a reason to flag
13 it for the SSC?

14 **A.** It would, yes.

15 **Q.** Yes, I see. If we see that and we then see the
16 SSC doing a remote reboot, would that be to try
17 to fix that?

18 **A.** I would have thought a remote reboot would have
19 been done by the event management team rather
20 than us but that would be an attempt to fix
21 that, yes.

22 **Q.** How did SSC go about doing a remote reboot, if
23 I can just try to understand that?

24 **A.** This is why I said it would be the event
25 management team. I believe a remote reboot was

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1 effected by a Tivoli script being fired at the
 2 counter. So the SSC didn't use Tivoli scripts.
 3 This was departments like VSMC who would have
 4 effected that.

5 **Q.** So a Tivoli script can be used to do that and,
 6 in the case of a bad block, that would be
 7 an attempt to restore messages on the hard
 8 drive?

9 **A.** It wouldn't be an attempt to restore messages.
 10 Generally, if I remember correctly, if you -- to
 11 reboot -- if you rebooted after a bad block, it
 12 would trigger part of the Windows NT operating
 13 system to actually try to repair the disk and
 14 I believe that was why it was done but we are
 15 out of my technical expertise, there, really.

16 **Q.** Well, that's very helpful. Is that likely,
 17 then, it might well tie in to SMC doing
 18 something with replacing hardware if it failed?

19 **A.** Yes, it would, yeah.

20 **MS PAGE:** Thank you, those are my questions.

21 **MR BEER:** Sir, just before you release Mr Parker,
 22 I wonder whether I could ask for your
 23 indulgence. The error in the two documents not
 24 being available to display is entirely my fault,
 25 and nothing to do with the hardworking team that

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1 **Further questioned by MR BEER**

2 **MR BEER:** Can we look at FUJ00138386, which is on
 3 the screen.

4 You'll see that it's a work instruction
 5 written by you on 8 September 2011. The title
 6 of it is "Providing evidence for police or
 7 litigation enquiries". It's version 11, and was
 8 last updated by Mr Woodley in August 2021.
 9 Details:

10 "Any request for evidence supporting any
 11 form of litigation must be made via a defined
 12 route. That route is from the security
 13 department in POL to the Fraud and Litigation
 14 service within the CSPOA Security team. This is
 15 the only route that can be used for evidential
 16 purposes because the data handling conforms to
 17 the required legal rules for evidence.

18 "CSPOA Security will make contact with the
 19 police and if necessary with POL lawyers. CSPOA
 20 Security team may request that SSC staff provide
 21 some technical input to the process. CSPOA
 22 Security do not notify POL as to who provides
 23 input into their general processes. They have
 24 confirmed that no member of SSC will be required
 25 to raise and sign any statements of witness as

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1 sits behind me. Could I ask you just to rise
 2 for five minutes, please. We might be able to
 3 sort it out.

4 The questions that I have to ask are less
 5 than ten minutes and, just in case we don't call
 6 Mr Parker back in Phase 5, it would be
 7 an advantage to him and to us if we got the
 8 questions out of the way now.

9 **SIR BRIAN LANGSTAFF:** Yes, by all means. Certainly.

10 **MR BEER:** We'll let you know when we're ready, but
 11 I imagine it'll be five minutes.

12 **SIR WYN WILLIAMS:** What I'll do is I'll stay close
 13 to my monitor. I'll actually switch the video
 14 off but I won't leave the room, so that you can
 15 just speak to me and I'll come back to life
 16 immediately.

17 **MR BEER:** Thank you, sir.

18 **SIR WYN WILLIAMS:** Fine.

19 **(3.52 pm)**

20 **(A short break)**

21 **(3.55 pm)**

22 **MR BEER:** Can you see and hear us?

23 **SIR WYN WILLIAMS:** Yes, I can.

24 **MR BEER:** Thank you very much. Apologies for that
 25 once more, and apologies to you, Mr Parker.

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1 to their activity in such matters and nor will
 2 any pressure be brought to bear on SSC staff to
 3 do so. If a request is made for a statement of
 4 witness you should immediately inform the SSC
 5 duty manager."

6 Then there's something about physical
 7 hardware that I'm not going to read.

8 Why were you writing a work instruction in
 9 September 2011 about the provision of evidence
 10 to the police, or to POL?

11 **A.** It must have been because it became clear to me
 12 that requests of this sort were being made
 13 without coming from the CS security team and, as
 14 I say there, that was the approved route and the
 15 only one which should be used for those
 16 purposes.

17 **Q.** Can you recall what had happened, what event
 18 justified the writing of this work instruction?

19 **A.** No. Only that some sort of event of that type
 20 must have happened to trigger me to make things
 21 hopefully crystal clear.

22 **Q.** You see it refers in its body to the CSPOA
 23 Security team, and CSPOA Security, yes?

24 **A.** Yes, indeed.

25 **Q.** And that it refers to the Fraud and Litigation

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1 service within the CSPOA Security team. For how
 2 long had the Fraud and Litigation service within
 3 the CSPOA existed at the time that you wrote
 4 this, or is that a later author's work?
 5 **A.** I think the Fraud and Litigation service
 6 responsibility that the CSPOA Security team had
 7 always been there. I don't remember it being
 8 something new. It was the means by which
 9 evidence could be obtained and that was going on
 10 while I was both the SSC manager and previously.
 11 **Q.** You see it's got a capital "F" and capital
 12 "L" --
 13 **A.** Yes, indeed.
 14 **Q.** -- on "Fraud and Litigation", which might
 15 suggest a title to a suborganisation within
 16 CSPOA Security team. Am I right to draw that
 17 from it or is that just a function that's being
 18 described, namely Fraud and Litigation service
 19 provision?
 20 **A.** I can't be sure if somebody has changed it
 21 afterwards. During my time, it was a function
 22 rather than a separate service.
 23 **Q.** We've heard from somebody called Andy Dunks.
 24 Did he work in that team?
 25 **A.** He did, yes.

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1 happen".
 2 **Q.** Or was it because the maker of the request from
 3 within the security team would know what those
 4 legal rules of evidence were?
 5 **A.** I would expect them to, yes.
 6 **Q.** But I'm trying to discover what the requirement
 7 that this single route had as its *raison d'être*;
 8 would it be because you needed to secure
 9 continuity or was it because the person making
 10 the request is in the know on legal rules of
 11 evidence and therefore any requests should come
 12 from them?
 13 **A.** It was the former in that we were -- I was
 14 trying to ensure that the correct evidential
 15 rules were followed by the team who actually
 16 knew what those rules were.
 17 **Q.** Was there any document that you were aware of in
 18 your time in the SSC that set out the legal
 19 rules for evidence to guide the SSC in the
 20 provision of evidence?
 21 **A.** No.
 22 **Q.** The document continues:
 23 "They [that's Security] have confirmed that
 24 no member of SSC will be required to raise and
 25 sign any statement as to their activity in such

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1 **Q.** The work instruction says:
 2 "This is the only route that can be used for
 3 evidential purposes because the data handling
 4 conforms to the required legal rules for
 5 evidence."
 6 Can you explain what that sentence is meant
 7 to mean?
 8 **A.** Only the face value that it gives you there.
 9 I mean, I'm not -- I wasn't in any way involved
 10 with that process from -- for the CSPOA Security
 11 team. I was just aware that it had to be done
 12 that way.
 13 **Q.** What had the requirement that there be a single
 14 route got to do with what are described as the
 15 "legal rules of evidence"?
 16 **A.** That was a -- those words would have -- or that
 17 requirement would have been given to me, rather
 18 than me understanding it and making it up.
 19 **Q.** Was the concern about exhibit or physical
 20 security of evidence being passed from one
 21 person to another to ensure continuity, for
 22 example?
 23 **A.** I remember brief discussions about continuity of
 24 evidence and evidential requirements and just
 25 being told, "Look, this is the way it has to

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1 matters, and nor will any pressure be brought to
 2 bear on SSC staff to do so."
 3 In the past, had the security team required
 4 SSC staff to provide a witness statement?
 5 **A.** That was -- this was a reflection on the
 6 situation for Anne Chambers, where she was
 7 required to provide a witness statement, and
 8 that resulted in a court appearance which she
 9 found stressful, and this was a way of trying to
 10 alleviate the fears of other SSC staff that they
 11 would be put into the same position.
 12 **Q.** But five years had elapsed --
 13 **A.** Mm.
 14 **Q.** -- between the Castleton case and this work
 15 instruction. What prompted, after that
 16 five-year period passing, you to return to this
 17 issue?
 18 **A.** There must have been a litigation query or
 19 something which came in via the wrong route.
 20 **Q.** I mean, presumably the security team had
 21 required SSC staff to provide a witness
 22 statement, otherwise the record of a guarantee
 23 that they wouldn't would be unnecessary?
 24 **A.** That may have been the case. All I can remember
 25 is something definitely happened to trigger me

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1 actually writing it, to attempt to (a) define
 2 the route clearly and (b) put SSC staff's mind
 3 at rest that they wouldn't find themselves in
 4 a courtroom for just helping the security team
 5 with a few bits of advice and guidance.
 6 **Q.** I'm trying to discover what the trigger was,
 7 given the only one we've identified happened
 8 five years before this document was written.
 9 **A.** Sorry, I don't know.
 10 **Q.** In the past, had the security team brought
 11 pressure to bear on SSC staff to provide
 12 a witness statement?
 13 **A.** Not during my tenure. I don't remember that
 14 going on. I do remember the situation with Anne
 15 Chambers and Mik but that's the only one
 16 I clearly remember.
 17 **Q.** Thank you. Can we move to the second document,
 18 please. POL00099397. This is an email exchange
 19 involving you in 2013. Can we pick it up at the
 20 bottom of page 3, please.
 21 If we look at the bottom of this page,
 22 please, we can see an email from Andrew Winn to
 23 you of 16 July 2013 at 16.01:
 24 "Hi Steve
 25 "Would you be able to assist with this one?"

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1 **Q.** Why were you including that warning to Mr Winn?
 2 **A.** Reminder only. I mean, I wasn't sure how Andy
 3 intended to use the information he was asking me
 4 for.
 5 **Q.** Then if we scroll up, please.
 6 "I think that is all I need. It is all
 7 I would pull if it was within 3 months.
 8 "Good point about litigation. I am aware
 9 that any evidence we put in front of a court
 10 must come through the right channel. I am
 11 dealing well before this point but have to be
 12 aware that any case may end up in court. I will
 13 typically say something like 'I've asked Fujitsu
 14 to investigate and they have confirmed that
 15 a referral was made to your Horizon System ...'
 16 So something like that might get waved around in
 17 court but the transactional data presented would
 18 need to come through approved channels."
 19 Then if we look at your reply at the foot of
 20 page 1. It's at the foot of the page now, "The
 21 litigation bit", thank you:
 22 "The litigation bit is all to do with chain
 23 of evidence for prosecutions and delivery in
 24 court. I'm sensitive about it because in the
 25 distant past one of my [colleagues] was

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1 I've been trying for months to get the referral
 2 info from the raw logs as per Gareth's advice
 3 without success.
 4 "Ironically I have had a subsequent
 5 challenge from [some details are given]. Is
 6 this something that can be relatively easily
 7 pulled within the 6 month window when detailed
 8 data moves into archive?
 9 "Appreciate any help."
 10 Then you reply at the bottom of page 2,
 11 please:
 12 "Andy,
 13 "Initial information on Gilmerton ... shows
 14 that the transaction was a referral. Still
 15 working."
 16 Then you put a note.
 17 "NOTE: not trying to teach you to suck eggs
 18 but thought I'd remind you that none of the
 19 information we dig out for you like this can be
 20 used in litigation. Anything required for
 21 evidential purposes MUST come from the
 22 litigation support team."
 23 So does that reflect the work instruction
 24 that you had raised a couple of years earlier?
 25 **A.** It does, yes.

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1 'persuaded' (by our side, not yours) to write
 2 an evidence statement without fully
 3 understanding the implications. As you know,
 4 our 'professional witness' for these types of
 5 cases is Gareth Jenkins but in this case,
 6 because process was not followed, Gareth
 7 couldn't do it and preparation for court became
 8 very difficult."
 9 Is that paragraph a reference to Anne
 10 Chambers and the Lee Castleton case?
 11 **A.** It is, yes.
 12 **Q.** You say:
 13 "In the distant past one of my team was
 14 'persuaded' (by our side, not yours) ..."
 15 You're here corresponding with Andy Winn of
 16 the Post Office?
 17 **A.** Correct.
 18 **Q.** So "our side" means Fujitsu, "your side" means
 19 Post Office?
 20 **A.** It does, yes.
 21 **Q.** Who in your side had persuaded Anne Chambers to
 22 give evidence?
 23 **A.** I don't remember the name. It was the --
 24 somebody in the security team but, again, you'd
 25 have to ask Mik Peach. I mean, he was privy to

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1 that. I wasn't.
 2 **Q.** You say that:
 3 "[She was persuaded] to write an evidence
 4 statement without fully understanding the
 5 implications."
 6 What were the implications that she didn't
 7 fully understand, to your knowledge?
 8 **A.** That was the implication of having to actually
 9 stand up in court and face some questioning.
 10 **Q.** So your understanding was she didn't know that
 11 if you provided a witness statement, you might
 12 have to come along in court and speak to it?
 13 **A.** I don't think that was made clear. That was my
 14 understanding but my knowledge of this is coming
 15 secondhand from Mik in majority, apart from the
 16 odd time that I talked to Anne about it at the
 17 time.
 18 **Q.** You continue:
 19 "As you know our 'professional witness' for
 20 these types of cases is Gareth Jenkins but in
 21 this case, because process was not followed,
 22 Gareth couldn't do it and preparation for court
 23 became very difficult."
 24 What was the process that ought to have been
 25 followed but which was not followed?

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1 give evidence and thank you for making a witness
 2 statement. It's possible, as you've heard, that
 3 you'll be asked to return, probably in some
 4 months' time, if you are asked to return and, if
 5 you are asked to return, a request for
 6 information, a Rule 9 Request, will be sent to
 7 you so that you know what it is that you have to
 8 address your mind to. All right?

9 **THE WITNESS:** Understood, yes.
 10 **SIR WYN WILLIAMS:** So thank you again.
 11 **MR BEER:** 10.00 am tomorrow for Mr Ismay.
 12 **SIR WYN WILLIAMS:** Fine. 10.00 tomorrow.
 13 (4.14 pm)

14 (The hearing adjourned until
 15 10.00 am the following day)

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1 **A.** I don't remember and I find that sentence
 2 strange because my recollection is that Gareth
 3 Jenkins started fulfilling that role after Anne
 4 Chambers found herself having to give a witness
 5 statement. So I can't think now why I made that
 6 statement.
 7 **Q.** That's what I'm exploring with you. Why was it
 8 that in the Lee Castleton case Mr Jenkins
 9 couldn't do it because process wasn't followed?
 10 **A.** I don't remember, and that would have been, as
 11 I say, Mik, I should think, doing that at that
 12 time.
 13 **Q.** In what way did preparation for court become
 14 very difficult?
 15 **A.** I don't remember.
 16 **Q.** Can you think back and try to assist us?
 17 **A.** Yeah, I'd like to but most of my knowledge about
 18 what happened in that situation came either from
 19 Mik or Anne, in conversations I had with them.
 20 I didn't actually -- I wasn't actually there,
 21 taking part. So sorry, I just don't remember.
 22 **MR BEER:** Thank you very much, Mr Parker.
 23 Sir, those are all the questions that I ask.
 24 **SIR WYN WILLIAMS:** Right.
 25 Well, thank you, Mr Parker, for coming to

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